SOCIAL PROTECTION POLICY PAPERS

Paper 16

Social protection for domestic workers: Key policy trends and statistics

Social Protection Department
in collaboration with
Inclusive Labour Markets, Labour Relations and Working Conditions Branch

INTERNATIONAL LABOUR OFFICE, GENEVA

First published 2016

ILO Cataloguing in Publication Data

Social protection for domestic workers : key policy trends and statistics / International Labour Office, Social Protection Department (SOCPRO). - Geneva: ILO, 2016
(Social protection policy paper : No. 16)

International Labour Office Social Protection Dept.

social protection / domestic work / domestic worker / social security / ILO Convention / ILO Recommendation / comment / application / advocacy

02.03.1

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Printed in Switzerland.

Foreword

The domestic work sector is highly relevant, due both to its quantitative importance in terms of the volume of employment that the activity contributes to the economy, as well as to its significant social and economic contribution in practically all modern societies. Paradoxically, as a group, domestic workers have been excluded from the human right to social security.

Due to its characteristics, the domestic work sector is considered a "difficult-to-cover" group. Work is performed in a private household and frequently for more than one employer. The occupation is characterized by high job turnover, frequent in-kind payment, irregular wages and labour relations that are not usually established through a formal work contract.

To successfully meet the challenge of extending social protection coverage to domestic workers, in addition to the political will of governments and other interested actors, adequate information is needed on the global situation and country practices in this area. This study attempts to contribute to closing the information gap that currently exists in this area.

Accordingly, the objective of this report is to present systematized international information with respect to the configuration and practices of social security schemes for the domestic work sector. It systematizes, describes and analyses the main characteristics of social security schemes in terms of their personal scope, institutional organization, administration and coverage rates. Practices observed in selected countries that have achieved advanced levels of domestic work coverage have been systematized and complement this information.

The findings in this study underscore the magnitude of the challenge of resolving the worldwide deficit of social security coverage for domestic workers. The challenge is a daunting one and involves most countries, even developed nations. The study demonstrates that major gaps exist in legal and effective coverage at the regional and country levels. Nevertheless, there is a clear trend toward increased coverage, especially in developing countries.

The ILO is pleased to publish this report, which for the first time addresses the situation of social protection of the domestic work sector at the global level. We hope that this study will serve as a reference for the different actors involved in the commendable task of extending social protection to domestic workers.

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Abstract

This policy paper: (i) provides an overview of the global situation of social security provisions for domestic workers in 163 countries; (ii) analyses trends, policies and gaps in terms of legal and effective social security coverage for domestic workers; (iii) describes and analyses the configuration of social security schemes for domestic workers, such as their institutional organization, financing and administration; (iv) informs on challenges to extending coverage; and (v) provides a compilation and description of international practices of social security schemes for the domestic work sector, including comparative information.

JEL Classification: E26, H53, H55, H75, I18, I38, J38

Keywords: social protection, social security, domestic worker, coverage, Informal economy

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Acronyms

ADB	Asian Development Bank
AFIP	Federal Public Revenue Administration, Argentina
ANSES	National Social Security Administration, Argentina
BPS	Social Security Institution (Banco de Previsión Social), Uruguay
BTL	National Insurance Institute of Israel
CCSS	Costa Rican Social Security Institute
CESU	Universal Employment Service Cheque, France
CNCESU	CESU National Centre, France
CPF	Central Provident Fund, Singapore
ECLAC	Economic Commission for Latin America and the Caribbean
EFSI	European Federation for Services to Individuals
EUROSTAT	Statistical Office of the European Union
HRW	Human Rights Watch
IESS	Social Security Institute of Ecuador
INPS	National Social Security Institute of Italy
INPS	National Institute of Social Security, Cape Verde
INWORK	Inclusive Labour Markets, Labour Relations and Working Conditions Branch of the ILO
ISSA	International Social Security Association
MPI	Migration Policy Institute
NERA	National Employment Rights Authority, Ireland
OECD	Organisation for Economic Co-operation and Development
OWWA	Overseas Workers Welfare Administration, Philippines
PhilHealth	Health Insurance Corporation of the Philippines
SGK	Social Security Institute, Turkey
SOCPRO	Social Protection Department of the ILO
SSS	Social Security System, Philippines
TS	Service vouchers Titres-services/Dienstencheque, Belgium
UIF	Unemployment Insurance Fund, South Africa
URSSAF	Union de Recouvrement des Cotisations de Sécurité Sociale et d'Allocations Familiales – Social Security and Family benefit contribution Collection Union, France

Acknowledgements

This report was written by Fabio Durán-Valverde, Senior Economist, Social Protection Department (SOCPRO) at the International Labour Office (ILO) and José Francisco Ortiz-Vindas, Social Protection Specialist at the ILO Office for Central America, Haiti, Panama and the Dominican Republic. It was done in collaboration with Karuna Pal, Senior Administrator, and Maya Stern-Plaza, Social Protection Legal Specialist, both of SOCPRO. Fabio Durán-Valverde was responsible for the technical coordination of the report. The report was enriched by the helpful comments of Isabel Ortiz, Director of SOCPRO, Valérie Schmitt, Chief of Social Policy, Governance and Standards Branch, and Clara Van Panhuys, Social Protection Specialist, of SOCPRO, as well as of Philippe Marcadent, Chief of the Inclusive Labour Markets, Labour Relations and Working Conditions Branch (INWORK), Claire Hobden and Amelita King-Dejardin specialists of INWORK, Samia Kazi-Aoul, Specialist in Migration of the ILO Labour Migration Branch, and María José Chamorro, Senior Specialist in Gender of the ILO Office for Central America, Haiti, Panama and the Dominican Republic. The project has also benefited from the editorial support of Victoria Giroud-Castiella, Social Protection Officer, of SOCPRO.

Key messages

- Due to the atypical characteristics of domestic work, workers are considered a "difficult-to-cover" group by social security; it is estimated that globally 90 per cent of domestic workers are legally excluded from social security systems. These characteristics include the fact that work is performed in a private household which makes it difficult to control and inspect; workers frequently have more than one employer; there is a high job turnover rate; in-kind payment is common; receipt of wage income is highly irregular and labour relations are not usually established through an employment contract. These difficulties are also associated with other factors such as the lack of legal recognition of domestic work as an occupation, the existence of discriminatory social and legal practices, as well as other socio-cultural elements which engender a low social value for domestic work.

- Information compiled by the ILO highlights an important coverage deficit. It is estimated that of the 67 million domestic workers worldwide, 60 million are excluded from coverage of social security.

- Of the 163 countries included in this study, at least 70 (43 per cent) have laws mandating legal coverage for domestic workers of one or more of the nine branches of social security established in the ILO's Social Security (Minimum Standards) Convention (No. 102).

- The largest gaps in social security coverage for the domestic work sector are concentrated in developing countries, where few nations provide legal coverage for this sector. Moreover, developing regions have the largest share of domestic workers worldwide, Asia and Latin America regroup 68 per cent of domestic workers worldwide.

- Social security coverage deficits for domestic workers also exist in industrialized countries. For example, in Italy approximately 60 per cent of domestic workers are not registered with or contributing to social security systems. In Spain and France, 30 per cent of domestic workers are excluded from social security coverage.

- The information presented in this report demonstrates that coverage of domestic workers by social security schemes is feasible, including in lower middle and low-income countries, such as evidence shows for Mali, Senegal and Viet Nam.

- There is no single social protection model for the sector. Most countries have opted to provide social protection to domestic workers through general social security schemes, guaranteeing legally the same conditions of coverage as those established for other employees, or with minor variations.

- Eight countries report having voluntary social security coverage for domestic workers. The low rate of effective coverage existing in those countries indicates that voluntary coverage is a practice that hinders efforts to extend social security to domestic workers, for a variety of reasons. However, effective coverage continues to be low in other countries with mandatory systems, which points to the existence of other barriers and national practices that likewise impede effective coverage.

- Women comprise the majority of domestic workers, accounting for 80 per cent of all workers in the sector globally; which means that approximately 55 million women participate in this activity. Given that it is predominantly a female workforce subject to conditions of discrimination and social and economic vulnerability, policies to

extend social protection to domestic workers are a key component of efforts to fight poverty and promote gender equality.

- Migrant domestic workers, estimated at approximately 11.5 million persons worldwide, face even greater discrimination than that experienced by domestic workers in general. Approximately 14 per cent of countries whose social security systems provide some type of coverage for domestic workers do not extend the same rights to migrant domestic workers.

- The main barriers for extending social security coverage to the domestic work sector are associated with the following: legal exclusion; voluntary rather than mandatory coverage; lack of provisions or strategies to cover workers who have more than one employer (multi-employer) or who work part-time; narrow legal definition of domestic work; restrictions on legally protected contingencies; lack of contributory incentives, including the absence of contributory conditions adapted to the low contributory capacity of the sector; complexity or inadequacy of administrative procedures for registration and contribution collection; difficulty in ensuring inspection, lack of information on rights and responsibilities; and low level of organization of domestic workers, among others.

- Mandatory coverage is identified as a crucial element and a necessary, but insufficient, condition for achieving adequate rates of effective coverage of domestic workers. Mandatory enrolment should be complemented by strategies associated amongst others with institutional organization, financing, registration and promotion of coverage, collection and recovery of contributions, and coverage of migrant domestic workers.

- Countries with high levels of social protection coverage for the domestic work sector have implemented a combination of strategies that include: the application of mandatory rather than voluntary coverage; differentiated contributory schemes in relation to those applied to other employees; government subsidies; fiscal incentives; registration plans for workers who have more than one employer (multi-employer) or who work part-time; education and awareness-raising programmes targeting domestic workers and their employers; intensive use of information technologies; and implementation of service voucher mechanisms and presumptive schemes.

- It is important to bear in mind that policies and strategies to extend social security coverage in the domestic work sector form part of a broader set of interventions guided by formalization policies in general. These policies are part of the labour protection system, which includes the domestic work sector. At the same time, this system has a variety of components that go beyond the specific configuration and strategies of social security systems or their institutions.

Introduction

Domestic work is one of the oldest occupations and among the most vital for the functioning of households and society as a whole. Several factors explain the sharp increase in demand for this work in recent years. These include women's increased participation in the labour force, the desire of women who work to reconcile work and family life, gaps in care services provided by the State, the increase in the feminization of international migration, and the ageing of the population, among others (D'Souza, 2010; ILO, 2012a).

For the purposes of this report, domestic work is defined as work performed in a private household in the framework of a work relationship through which the employed person receives remuneration. A domestic worker may work on a full-time or part-time basis; may be employed by a single household or by multiple employers; may reside in the household of the employer (live-in) or may live in his or her own residence (live-out) or work in a foreign country. A key characteristic of this employment relationship is that the employer has no economic gain or commercial interest associated with the tasks the worker performs.

Domestic work entails tasks such as cleaning the house, cooking, washing and ironing clothes, taking care of children, elderly or sick members of a family, gardening, guarding the house, driving for the family, and even taking care of household pets (ILO, 2011b). In general, domestic workers perform more than one of these activities in their workplace.

Domestic work has traditionally been characterized by poor working conditions, long hours, low wages, forced labour and little or no social protection (ILO, 2012c). In other words, domestic workers are exposed to conditions that are far from the concept of decent work promoted by the ILO. This situation largely reflects the low social and economic value societies usually place on this activity. This is often reflected by the absence of adequate laws and the lack of effective enforcement of those that do exist.

This report has two objectives. First, it aims to provide systematized information on the international situation of social protection in the domestic work sector. To this end, it presents recent information compiled by ILO's Social Protection Department on the characteristics of social security schemes that provide coverage to domestic workers. A second objective is to compile and disseminate information on legal practices, institutional organization, financing and registration, collection and payment of contributions. This information and the corresponding analysis can provide useful inputs for policymaking.

Social security is a human right and its compliance is in essence the main justification for guaranteeing social protection to those who perform domestic work. With the adoption of the Domestic Workers Convention, 2011 (No. 189) and the Domestic Workers Recommendation, 2011 (No. 201) accompanying the Convention, as well as the Social Protection Floors Recommendation, 2012 (No. 202), and the recent adoption of the Transition from the Informal to the Formal Economy Recommendation, 2015 (No. 204), the world has taken an important step towards securing the labour and social security rights of domestic workers. However, as the results of this study demonstrate, the task is far from complete. The ILO's vision, set forth in the Social Protection Floors Recommendation, 2012 (No. 202), provides a highly relevant role to the coverage of domestic workers because it considers that the principle of universality of protection, including of workers of the informal economy, underpins the implementation and maintenance of national comprehensive social security systems. Article 14 of Convention No. 189 establishes that "each Member shall take appropriate measures, in accordance with national laws and regulations and with due regard for the specific characteristics of domestic work, to ensure

that domestic workers enjoy conditions that are not less favourable than those applicable to workers generally in respect of social security protection, including with respect to maternity." These measures "may be applied progressively, in consultation with the most representative organizations of employers and workers and, where they exist, with organizations representative of domestic workers and those representatives of employers of domestic workers." Reinforcing this principle, Recommendation No. 204 (Transition from the Informal to the Formal Economy) in paragraph 20 calls on Member States to take measures to progressively extend coverage of social insurance to those in the informal economy, and if necessary, adapt administrative procedures, benefits and contributions, taking into account the contributory capacity of the different groups or sectors.

Worldwide, domestic work is a source of employment for millions of people and it has become increasingly important, both in terms of job creation and income generation. According to ILO estimates, there were 67.1 million domestic workers in 2013; therefore, their considerable contribution to economic and social welfare is undeniable. Nevertheless, domestic workers face high levels of discrimination in its different forms, including the fact that these workers often are excluded from coverage by social security systems, making this population highly vulnerable. It should be recalled that Recommendation No. 202 also recognizes the need to apply the principles of non-discrimination, gender equality and responsiveness to the special needs of certain groups, such as domestic workers.

It is estimated that in 2013 women accounted for 80 per cent of domestic workers (ILO, 2015a). Extending social protection to this group could significantly contribute to reducing gender inequality. This situation highlights firstly to the need to modify policy design to adopt gender mainstreaming in social protection interventions targeting domestic workers. The large number of female domestic workers who are migrants also underscores the importance of extending social protection to overcome widespread social exclusion based on sex, ethnic origin and race.

For all of these reasons, extending social security to the domestic work sector is a worthy goal and an essential component of strategies to fight poverty and social exclusion. From the perspective of decent work promoted by the ILO, the inclusion of the domestic work sector in social security systems is in and of itself a formalization policy, which is closely linked to guaranteeing rights and compliance with the fundamental principles and rights at work.

The ILO frequently receives requests for assistance from governments that want to ratify Convention No. 189 concerning decent work for domestic workers. These governments often lack sufficient knowledge to apply this Convention, particularly in terms of the previsions established in Article 14 associated with the adoption of appropriate measures to guarantee that domestic workers enjoy conditions that are no less favourable than those applicable to workers in general with respect to social security, including maternity protection. This report answers questions from ILO constituents and shares examples of countries that have made advances in including domestic workers in their social security systems.

The report has three sections. The first provides global information on the situation of social security coverage of domestic workers, including the international legal framework and the regional perspective. The second section describes social protection schemes that include provisions for coverage of domestic workers. It also documents practices of social security schemes that in light of the positive results attained at national level could be considered good practices in many cases. Finally, section three summarizes the main conclusions of this study.

Part I. Global and regional situation

In recent years, the strengthening of social security systems as a result of national initiatives or mandates of international organizations such as the ILO has enabled several countries to incorporate measures to guarantee social protection to domestic workers and their families, who have long formed part of excluded groups.

To gain an understanding of the current situation of social security access in the domestic work sector, this section provides a global and regional overview of legal and effective coverage of domestic workers. The goal is to identify whether a legal framework for social security that covers domestic work exists in the different countries, and to the extent the available information permits, to determine the scope of coverage. This report assesses social security coverage for all regions using the following classification: Africa, Asia and the Pacific, Latin America and the Caribbean, the Middle East, North America, Western Europe and Eastern Europe. Among the challenges in preparing this report is the fact that some countries do not have clear information on the situation of coverage, neither legal nor effective, for which reason those cases are not considered in the analysis. Future studies on the subject should seek to complete this global mapping effort.

This first part of the report is divided into seven sections. The first section summarizes global and regional estimates of domestic work in an effort to contextualize the results of this report. The second section lists the information sources and explains how the data were processed and analysed to evaluate legal coverage while the third section describes key considerations regarding the definitions of domestic work in national laws and their relationship with ILO standards. The fourth section presents the results of the analysis of legal coverage of domestic workers worldwide; the fifth describes the main characteristics of social security schemes for the domestic work sector; and the sixth section presents information on effective coverage for a selected group of countries, both developed and developing. Finally, the last section of the report describes the main barriers to extending social security coverage to domestic workers.

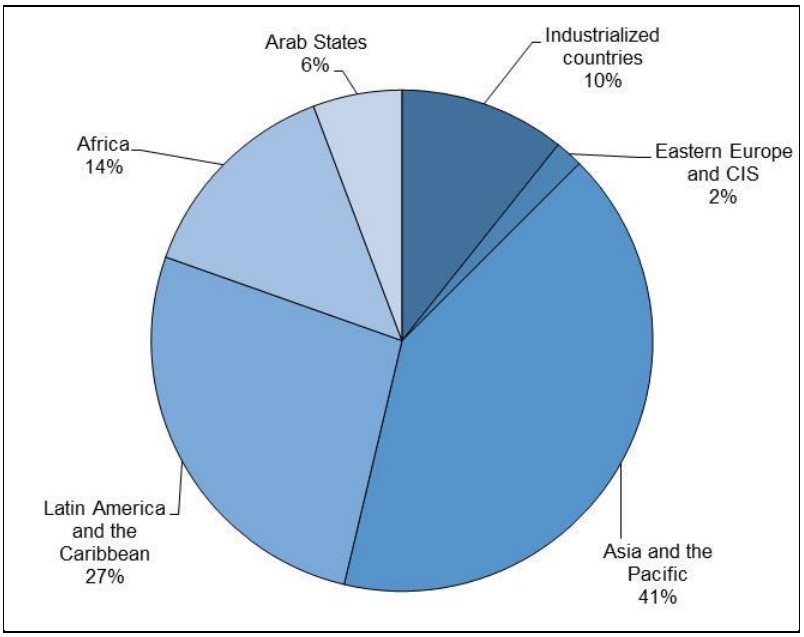
I.1. Global and regional estimates of domestic work

In 2013, an estimated 67.1 million people were employed as domestic workers in 176 countries around the world (ILO, 2015a). However, there are methodological reasons to believe that this figure is an underestimate. Even the official figure represents a large number of domestic workers. To put this figure in perspective, if all domestic workers worked in one country, that country would be the world's tenth largest employer.

Domestic work is a significant source of employment, accounting for 4 per cent of labour force worldwide. The sector has relatively less importance in industrialized countries, where domestic workers represent less than 1.5 per cent of total labour force, as compared with developing and emerging countries, where these workers represent a much higher share of the labour force. For example, in Latin America and the Caribbean, domestic work represents 6 per cent of the labour force, followed by the Arab States (7.7 per cent), Africa (2.2 per cent) and Asia and the Pacific (excluding China) (1.4 per cent).

The global distribution of domestic work (Figure 1) demonstrates that Asia and Latin America concentrate 68 per cent of all domestic workers, which suggests that these regions face greater challenges for ensuring social protection in that sector. Asia is unusual in that China alone accounts for 19.7 per cent of total domestic workers, and therefore concentrates almost half of domestic work employment of the Asia and Pacific Region.

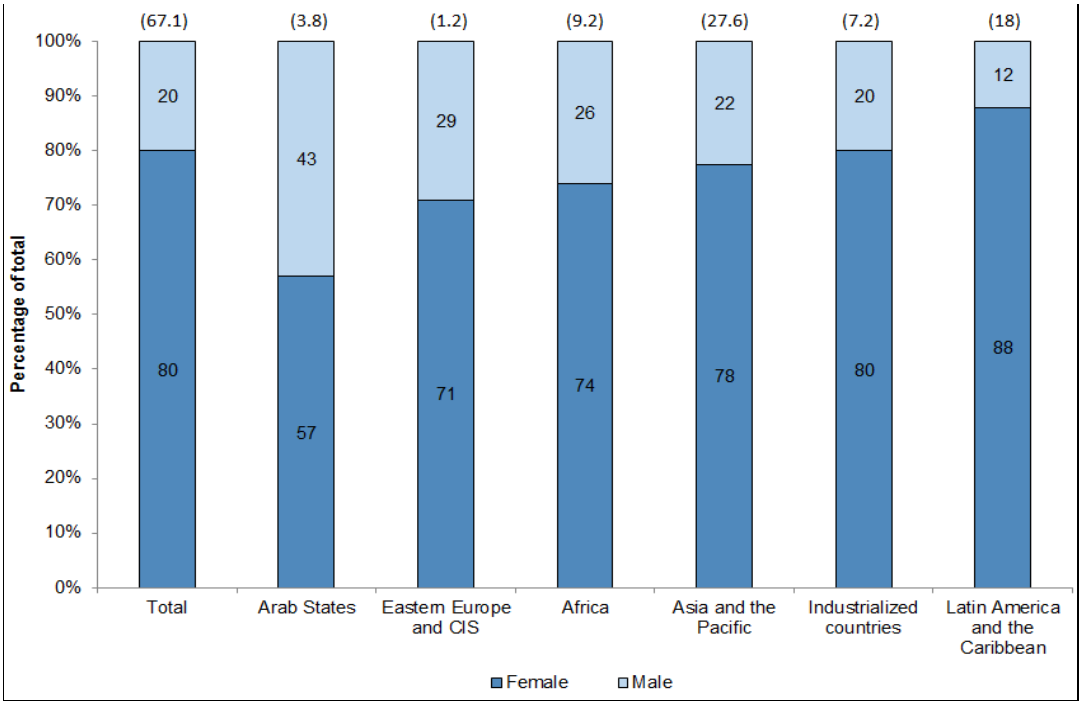
Figure 1. Global distribution of domestic work, by region, 2013



Source: ILO, 2015a.

With respect to the gender dimension, given that it is an activity predominantly undertaken by women, they account for 80 per cent of all domestic workers. The composition by sex differs across regions. In 2013, women accounted for 57 per cent of all domestic workers in the Arab States, 71 per cent in Eastern Europe and the CIS, 74 per cent in Africa, 80 per cent in the industrialized countries, 81 per cent in Asia and the Pacific, and close to 88 per cent in Latin America and the Caribbean.

Figure 2. Relative global distribution of domestic work by sex (by region) and total number of domestic workers by region (in millions), **2013**



Note: The figures in brackets refer to millions of workers.

Source: ILO (2015a).

The relative importance of domestic work within the workforce of wage-earners is significantly greater among women than among men. Global data reveal that domestic work accounts for 7.5 per cent of female wage employment worldwide, as compared with 1 per cent of that of men. The relative share of female domestic workers in the labour market is much higher in developing regions. For example, in the Arab States and Latin America, the percentage of female wage workers employed in domestic work is 32 per cent and 27 per cent, respectively (ILO, 2013a). By contrast, just 1 per cent of female wage workers are domestic workers in industrialized countries.

According to ILO estimates (ILO, 2015a), there are about 11.5 million migrant domestic workers, and it is possible to identify some general trends on migration flows. In Latin America and the Caribbean and Asia and the Pacific, migrant domestic work occurs mainly within the same regions, from lower- to higher-income countries. In Asia, for example, there is a significant flow of domestic workers from Indonesia, the Lao People's Democratic Republic and Cambodia toward Malaysia, as well as from Myanmar to Thailand. In other cases, people from Latin America, Africa and Asia and the Pacific regions seek employment in other regions, including North America, Europe and the Middle East.

Remuneration. Domestic work is among the lowest-paid occupations in the labour market. According to ILO estimates, domestic workers typically earn less than half of the average market wage (such as in France). In some cases, the sector wage is less than 23 per cent of the average wage for all paid employees, such as in Qatar (ILO, 2013a). Factors influencing this situation include the low educational and skills level of domestic workers, the low social status attributed to domestic work, wage discrimination and the limited bargaining power of workers in the sector (ILO, 2010b).

The perception that domestic work is "unproductive" because it does not generate direct benefits for employers is another justification for low wages (Tomei, 2011). Information from Switzerland demonstrates that domestic workers earned 10.3 per cent less than other workers who performed the same tasks in a workplace other than a private home (Flückiger et al, 2009). In other words, wages differed even in similar jobs, a situation that is difficult to justify.

Hours of work. Average working hours of domestic workers around the world are among the longest and most unpredictable of all groups of workers (ILO, 2013a). This reality imposes a high cost on the health and well-being of domestic workers and also affects the effectiveness and quality of the services they provide to employers.

Live-out domestic workers have somewhat more control over the number of hours worked in comparison to those who live in. Nevertheless, this does not limit the possibility of long workdays for one or several employers. The evidence indicates that migrant workers work longer hours and that the number of hours increases when they are live-in workers.

In general, domestic workers in developed countries work fewer hours in the week, such as in Sweden (31.5 hours, in 2007), Spain (25.9 hours), New Zealand (21.8 hours) and Norway (14 hours). By contrast, workers work longer hours in developing countries such as Namibia (62 hours, in 2007), the Philippines (53.3 hours), Indonesia (51 hours), Bolivia (47.2 hours) and Brazil (36.8 hours). By region, Asia has the highest average number of hours worked (ILO, 2013a). These data do not reflect the situation of workers who work more or less than the average.

I.2. Information sources and methodological aspects of coverage

Information on legal social protection coverage in the domestic work sector was compiled mainly through primary sources. The condition of legal coverage was consulted on websites of social security institutions, as well as of ministries of labour and social welfare or the equivalent, national statistics institutes and national organizations that bring together domestic workers. Additionally, this study relied on technical documents, reports, datasheets, presentations and other online information. These data allowed to review the legal framework of each country, including labour codes, national laws and regulations on domestic workers or workers of the informal economy, as well as social security laws and regulations, among other legal sources.

Secondary sources complemented this information, originating mainly from research studies and materials prepared by international organizations, such as the ILO, the Asian Development Bank (ADB), the Statistical Office of the European Union (EUROSTAT), the International Social Security Association (ISSA), the Organisation for Economic Co-operation and Development (OECD), the Economic Commission for Latin America and the Caribbean (ECLAC), as well as information produced by specialized agencies and international social organizations involved in the protection of rights of domestic workers and informal sector workers.

I.3. International legal framework: ILO standards

In an effort to improve national domestic work laws and practices of Member States with a view to promoting decent work in the sector, in 2011, the ILO adopted the Domestic Workers Convention (No. 189) and Recommendation No. 201 (concerning domestic workers). These have become the most important instruments on this subject in terms of the basic principles and minimum labour standards for this activity.

Convention No. 189 seeks to guarantee that domestic workers have conditions that are no less favourable than those generally applicable to other types of workers, and recognizes that to achieve this and other objectives requires considering the context of each country and the specific characteristics of domestic work. The Convention defines among other aspects the basic rights of workers, the terms and conditions of employment, working hours, remuneration, occupational safety and health, laws concerning child labour and migrant domestic workers, as well as guidelines on social security for domestic workers. It also stresses the importance of consulting with the most representative organizations of employers and workers and with organizations representative of domestic workers and of employers of domestic workers, where they exist, when modifying the rights and responsibilities of these groups. Given that the majority of domestic workers are women, the Convention makes a specific reference to the maternity protection, an issue of particular relevance to this group.

With respect to social security, Article 14 of Convention No. 189 establishes that all Member States "shall take appropriate measures, in accordance with national laws and regulations and with due regard for the specific characteristics of domestic work, to ensure that domestic workers enjoy conditions that are not less favourable than those applicable to workers generally in respect of social security protection, including with respect to maternity."

Thus, the Convention recognizes the right of domestic workers of member States that have ratified the convention – in accordance with national law –, to benefit from social security protection that is no less favourable than that for workers in general. For example, if a social security scheme provides sickness benefits, domestic workers should also have access to those benefits, whether through the general system or a special scheme. Two

clarifications are in order here. First, the Convention refers to the principle of "no less favourable," to demand treatment which, while it does not have to be identical, should be equivalent in its effects to those enjoyed by other workers. It also stresses the need to take into account "the specific characteristics of domestic work." Second, Article 14(2) states that the member States that adopt measures to provide that protection may do so progressively. Thus, each State has some flexibility, in accordance with national circumstances, in terms of how it offers that protection to domestic workers, as long as that protection is equivalent to that enjoyed by other workers and that there is a progression to completely equivalent protection. For example, a government may begin by offering one or more of the benefits of a social security system for a geographic area or for a category of domestic work and then progressively extend protection to include the full range of social security benefits to the entire domestic work sector.

As the preparatory reports to the Convention state, the expression "social security protection" should be guided by the nine branches of social security described and defined in the Social Security (Minimum Standards) Convention, 1952 (No. 102). The nine forms of protection are: medical care; sickness benefit; unemployment benefit, old-age benefits; employment injury benefit; family benefit; maternity benefit; invalidity benefit; and survivors' benefit.

Convention No. 189 is adequately complemented by the Social Protection Floors Recommendation, 2012 (No. 202), adopted two years later. With this recommendation, the ILO sought to fully exercise its mandate to promote social protection. The Recommendation calls for extending social security coverage to everyone, including migrants, moving beyond the traditionally structured, formal economy to encompass the population living in precarious conditions, poverty and insecurity, and adapting existing social security schemes to make them as complete as possible. This includes coverage of flexible and atypical forms of employment such as domestic work.

Additionally, the Domestic Workers Recommendation, 2011 (No. 201) that accompanies the Convention urges ILO member States to take measures to facilitate the payment of social security contributions, for example, through the creation of simplified payment systems. That Recommendation also highlights the potential of bilateral and multilateral agreements to guarantee equal treatment of migrant domestic workers in terms of social security, with an emphasis on guaranteeing the maintenance of acquired rights and the right to export benefits.

Recommendation No. 201 acknowledges the additional difficulties faced by migrant domestic workers, who are highly concentrated in some countries. The Recommendation recalls the Equality of Treatment (Social Security) Convention, 1962 (No. 118), the Maintenance of Social Security Rights Convention, 1982 (No. 157), and the Maintenance of Social Security Rights Recommendation, 1983 (No. 167), which establish the fundamental principles with respect to social security:

- Equal, non-discriminatory treatment, including equal treatment in terms of social security between nationals and non-nationals;
- Maintenance of acquired rights;
- Maintenance of rights in the course of acquisition; and
- Payment of benefits to beneficiaries residing abroad.

In addition to these instruments, there are other international standards that complement the labour protection framework for domestic work. These include the Forced Labour Convention, 1930 (No. 29), the Abolition of Forced Labour Convention, 1957

(No. 105), the Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), the Right to Organise and Collective Bargaining Convention, 1949 (No. 98), the Minimum Age Convention, 1973 (No. 138), the Migrant Workers (Supplementary Provisions) Convention, 1975 (No. 143), the Migrant Workers Recommendation, 1975 (No. 151), and the Worst Forms of Child Labour Convention, 1999 (No. 182).

To 2015, a total of 22 countries had ratified Convention No. 189 (Table 1), the majority of which belong to the region of Latin America and the Caribbean. Some countries have ratified the Convention but will not make it effective until 2016.

Table 1. List of countries that have ratified ILO Convention No. 189

Country	Region	Year of Ratification
Argentina	Latin America and the Caribbean	March 2014
Belgium *	Western Europe	June 2015
Bolivia	Latin America and the Caribbean	April 2013
Chile *	Latin America and the Caribbean	June 2015
Colombia	Latin America and the Caribbean	May 2014
Costa Rica	Latin America and the Caribbean	January 2014
Dominican Republic *	Latin America and the Caribbean	May 2015
Ecuador	Latin America and the Caribbean	December 2013
Germany	Western Europe	September 2013
Finland *	Western Europe	January 2015
Guyana	Latin America and the Caribbean	August 2013
Ireland	Western Europe	August 2014
Italy	Western Europe	January 2013
Mauritius	Africa	September 2012
Nicaragua	Latin America and the Caribbean	January 2013
Panama *	Latin America and the Caribbean	June 2015
Paraguay	Latin America and the Caribbean	May 2013
Philippines	Asia and the Pacific	September 2012
Portugal *	Western Europe	July 2015
South Africa	Africa	June 2013
Switzerland	Western Europe	November 2014
Uruguay	Latin America and the Caribbean	June 2012

* Effective in 2016.

Source: ILO, NORMLEX Information System on International Labour Standards.

The ratification of the Convention has frequently served as an impetus for establishing and accelerating legal and administrative reforms to improve the vertical dimension or level of coverage, as has occurred in Costa Rica, Bolivia, Paraguay and the Philippines (IDWN; ITUC; HRW, 2013). Some of these reforms were implemented to extend or improve the social protection of the domestic work sector. These reforms benefited from the participation of representatives of organizations of domestic workers and of their employers.

I.4. National definitions of domestic work and their relation with the ILO normative definition

Worldwide, significant differences have been identified in the content or scope of national definitions of domestic work.

Definitions of domestic work are generally expressed in labour codes or in specific laws regulating labour relations. In some developed countries, mainly in Western Europe, the definition of domestic work and the right to social security are established through collective bargaining, such as in the case of Sweden, or through a combination of specific laws and collective bargaining, such as in Austria, Belgium, France and Italy (ILO, 2012b; ILO, 2012c). Some countries have more than one national definition of domestic work, such as the Philippines, which has one definition in the Labour Code and another in a specific law regulating the activity; or Singapore, which has one definition in the national employment law and another in the law regulating one of the main social security schemes.

Other countries have no precise definition of domestic work, and thus establish, de facto, that domestic workers have the same rights and responsibilities as other employees, for which reason labour relations are tacitly expressed in the legislation.

The meaning of the term "domestic work" may vary considerably depending on the geographic and cultural context, for which reason it may differ from one country to another (ILO, 2010a). At any rate, this term is particularly important for the ILO given that it gives value to and dignifies this labour market activity. Some countries use terms such as "household worker" or "private home worker," which are equally acceptable in the ILO regulatory framework given that they recognize the activity as a job. Contrary to these practices, other countries use terms such as "maid" or "domestic servant," which suggest a type of submission on the part of the worker, while others use terms such as "household helper" or "household aide," whose disadvantage is that they diminish the importance of the concept of worker and consequently tend to devalue the nature of the occupation.

This studied identified some differences in the occupational categories included in the definitions of domestic work, as well as in the way these categories are specified within the different national laws.

Box 1. ILO definition of domestic work

The Domestic Workers Convention (No. 189) in Article 1(a) defines domestic work as "the work performed in or for a household or households" (ILO, 2011a). Domestic work entails tasks such as cleaning the house, cooking, washing and ironing clothes, taking care of children, or elderly or sick members of a family, gardening, guarding the house, driving for the family, and even taking care of household pets (ILO, 2011b).

According to the Convention, the term domestic worker means "…any person engaged in domestic work within an employment relationship." (Article 1(b)). This definition includes domestic workers employed on a part-time basis and those working for multiple employers, nationals and non-nationals, as well as both live-in and live-out workers. The employer may be a member of the household for which the work is performed or an agency or enterprise that employs domestic workers and makes them available to households (ILO, 2011c). Additionally, the Convention specifies that "a person who performs domestic work only occasionally or sporadically and not on an occupational basis is not a domestic worker." (Article 1(c)).

Source: ILO (2011a), ILO (2011b) and ILO (2011c).

According to the categories included in the ILO definition (Box 1), the most usual activities established in legislation are that of cooking, cleaning and caring for household members while the least-frequently cited are gardening, guarding and driving, which may be implicitly or explicitly excluded from the definition of domestic work. In some countries, the occupational categories of domestic work are listed separately, which expressly include other, similar categories, as long as the employer is the household head and the work is performed in his or her place of usual residence. Other countries establish lists of some of the tasks performed by domestic workers, without organizing them into separate occupational categories (ILO, 2010a).

In countries with more than one legal definition of domestic work, the classification included in the labour code usually differs from that established in social security norms,

mainly with respect to the activities included in the definition, which often limits the scope of coverage and becomes an element of exclusion.

Additionally, several laws stipulate that individuals who occasionally or sporadically work as domestic workers are excluded from the legislation. For example, Finland's Employment Law of Domestic Workers excludes from the group of domestic workers those who have contracts of less than one month, less than four days weekly or less than four hours a day for the same employer (Article No. 2, Law of Employment of Domestic Workers).

Finally, some laws explicitly define the concept of the domestic work employer. In most cases, the employer is assumed to be an individual, usually the household head. However, in Brazil the law stipulates that the employer may be a person or a family that requests domestic work services (Decree No. 71885/1973). In Barbados, the law stipulates that the employer may be an individual, agent, manager or representative of that person, directly or indirectly responsible for the employed person's remuneration (Article No. 2, Domestic Employees Act, 1985). Although these distinctions are important, in terms of social security, they are usually the same social security institutions or schemes that more specifically define the concept of employer, usually through the regulation on enrolment or registration processes.

As discussed later in this report, besides differences in the scope of social security laws with respect to the domestic work sector across and within countries, social security legislation in several countries does not include domestic workers. In several cases, the laws explicitly exclude domestic workers from labour and social security rights, thus devaluing the economic activity and creating an environment of increased social vulnerability and disadvantage for this group.

I.5. Legal coverage of social security schemes worldwide

From the standpoint of inclusion of domestic work in labour law, ILO estimates (2013a) indicate that in 2010 only 10 per cent of the world's domestic workers, approximately 6.7 million in 2013, are covered by general labour laws to the same extent as other workers. This situation reveals the large gaps in terms of the legal exclusion that domestic workers face.

According to information from 163 countries [1] collected for this report, at least 70 (43 per cent) have provisions that provide some sort of social protection to domestic workers. This means that the laws of those countries provide legal protection in at least one of the nine branches of social security set forth in the Social Security (Minimum Standards) Convention, 1952 (No. 102). This figure basically includes contributory transfers but in some cases also refers to non-contributory benefits, such as health insurance in Brazil and the United Kingdom, or family benefits in Argentina. Table 2 lists the countries, classified by regions, which have enacted some provision for social security coverage of domestic workers.

[1] Annex 1 List the countries analysed in this report.

Table 2. List of countries with some legal provision for social security coverage of domestic workers (coverage of at least one contingency)

Africa	Asia and the Pacific	Central and Eastern Europe	Latin America and the Caribbean	Middle East	North America	Western Europe
12	**9**	**8**	**18**	**3**	**2**	**18**
Algeria	China (Hong Kong)	Bulgaria	Argentina	Egypt	Canada	Austria
Cabo Verde	Fiji *	Czech Republic	Bolivia (Plurinational State of)	Israel	United States	Belgium
Gabon	Indonesia	Hungry	Brazil	Turkey		Denmark
Kenya	Republic of Korea *	Latvia	Chile			Finland
Mali	Malaysia *	Lithuania	Colombia			France
Mauritania	New Zealand	Poland	Costa Rica			Germany
Mauritius	Philippines	Romania	Cuba			Greece
Senegal	Singapore	Russian Federation	Ecuador			Iceland *
South Africa	Viet Nam		El Salvador *			Ireland
Togo			Guatemala *			Italy
Tunisia			Honduras *			Luxembourg
Zambia			Mexico *			Netherlands
			Nicaragua			Norway
			Panama			Portugal
			Paraguay			Spain
			Peru			Sweden
			Uruguay			Switzerland (Geneva)
			Venezuela (Bolivarian Republic of)			United Kingdom

* Voluntary coverage.

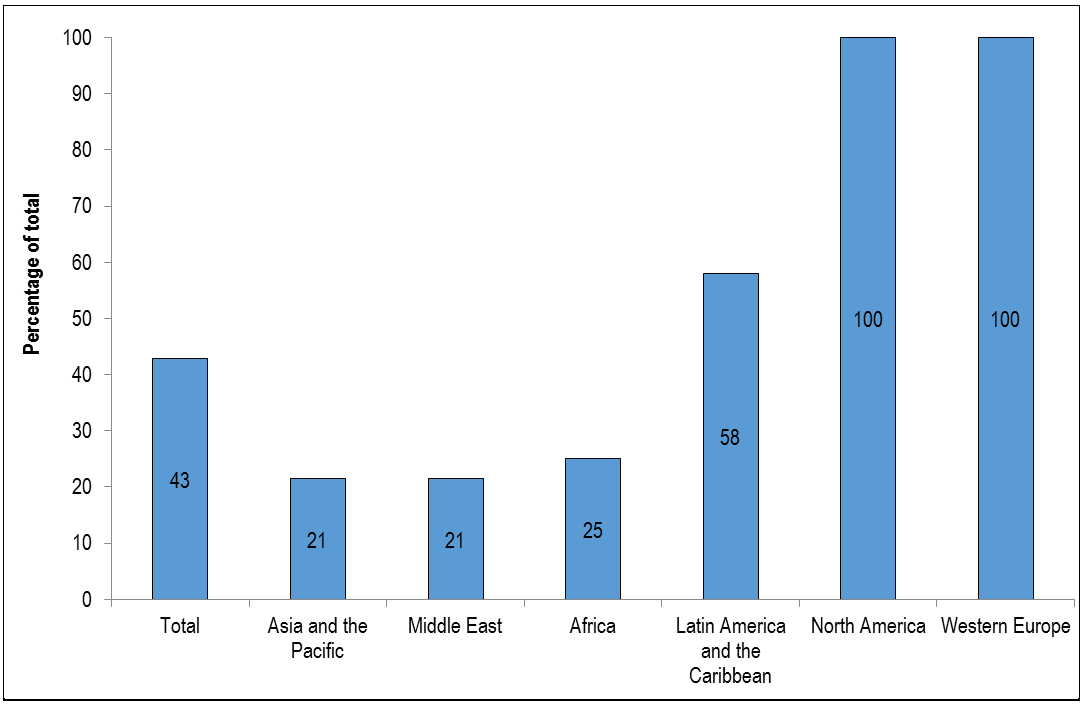
Source: ILO Social Protection Department, Domestic Work Database

According to the World Bank classification by income level, of the 70 countries identified as having some type of legal coverage for domestic workers, 31 are high-income countries, 22 are high middle-income, 14 are low middle-income and three are low-income countries. Note that not all countries listed in Table 2 are developed nations, which demonstrates that it is possible to extend legal coverage to the domestic work sector even in low middle-income and low income countries, such as Mali, Senegal and Vietnam.

The lack of affordability, defined in terms of the capacity to contribute to social security programmes, oftentimes is used to justify the exclusion from coverage of certain groups, such as frequently occurs with domestic workers. In this context, it should be recalled that accessibility largely depends on the willingness of a society to finance social transfers to different groups through a combination of several sources. The extension of effective coverage is largely determined by political will, although this is not enough; it also requires a certain capacity to guarantee financing.

Figure 3 shows that all countries of North America and Western Europe provide some type of social protection to domestic workers, a practice largely explained by the level of development of their social protection systems.

Figure 3. Percentage of countries that provide legal social security coverage for domestic workers, by region



Note: The number of countries included in each region corresponds only to those where it was possible to verify whether or not coverage exists. Consequently, countries with insufficient information are not included in these calculations. The figures in brackets refer to the total number of countries analysed by region.

Source: Social Protection Department, ILO, Domestic Work Database.

In Latin America and the Caribbean, approximately 60 per cent of countries (31) have established some type of social security coverage for domestic workers; in Africa it is 25 per cent; and in the Middle East and the Asia and Pacific region, a fifth of the countries provide coverage. In Central and Eastern Europe, approximately 45 per cent of domestic workers are excluded from national labour laws (in 2010) (ILO, 2013a). Thus, it can be concluded that developing regions face greater challenges in terms of legal coverage deficits, not only due to the reduced number of countries that provide such coverage for domestic workers, but also because those regions have a higher concentration of domestic workers than the world average, particularly Asia and Latin America (ILO, 2015a). This underscores the need to step up efforts to guarantee domestic workers' rights to social protection in the regions with the largest gaps. To this end, the development of information on country experiences in the design and implementation of social security schemes for domestic workers is important.

I.6. Configuration of social security schemes

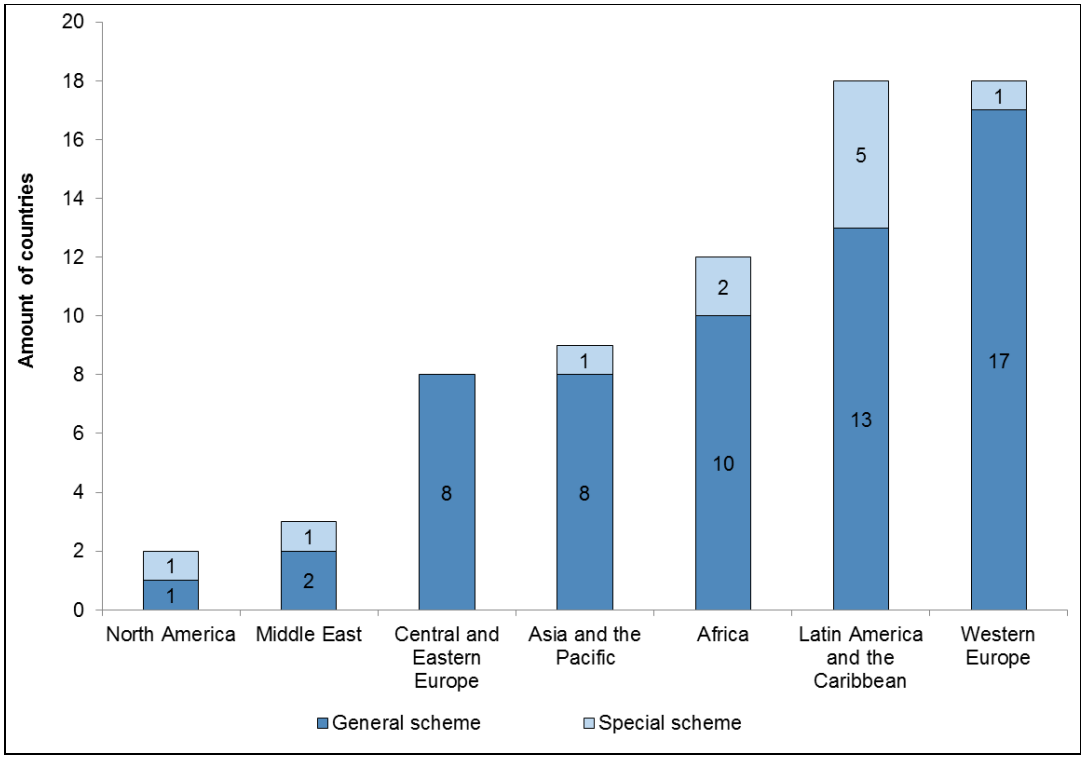
There are significant differences in the configuration of social security schemes for domestic workers, mainly in terms of programme design and implementation. The main components that differ are associated with: the type of scheme (general or special) designed to cover workers; the enrolment system – whether it is mandatory or voluntary; the number of contingencies or branches of social security covered; financing; availability

of coverage provisions for migrant domestic workers; and the effective coverage of the schemes. These and other key issues are discussed below.

The design of social security schemes demonstrates a clear trend toward inclusion of domestic workers in general schemes, thus legally guaranteeing the same coverage conditions other workers enjoy, or with some minor variations (Figure 4). This is positive in that it represents a means to comply with Article No. 14 of Domestic Workers Convention No. 189, which underscored the need to guarantee that domestic workers enjoy conditions no less favourable, in terms of social security coverage, than those applicable to other workers.

Regarding international experience, countries that have specific social protection schemes or programmes for the domestic work sector include Algeria, Egypt, El Salvador, Germany, Guatemala, Honduras, Hong Kong (China), Mexico, Paraguay, Tunisia and the United States. Recently, some countries have eliminated special schemes for domestic workers and have transferred their coverage to the general system. Spain is one such country, where the government eliminated the Special Scheme for Household Employees in 2011 and created the Special System within the General Social Security Scheme to include domestic workers, granting them practically all of the benefits offered in the General Scheme.

Figure 4. Number of countries with legal coverage of the domestic work sector, by region and type of scheme (general versus special)



Source: Social Protection Department, ILO, Domestic Work Database.

With respect to type of enrolment, only a small number of countries have voluntary social security coverage for domestic workers. It is noteworthy that in recent years, many countries have reformed legislation to make coverage mandatory. El Salvador, Fiji, Guatemala, Honduras, Iceland, Malaysia, Mexico and South Korea still have voluntary coverage.

International experience has shown that voluntary coverage is ineffective while mandatory social security registration is highly useful and effective for a group such as

domestic workers, which are usually considered a difficult-to-cover group. The process to register domestic workers in social security schemes can be complex in light of the atypical nature of the occupation. Some aspects that justify this are that: the work is performed in a private home, which makes it difficult to carry out labour inspections (see Box 2); workers are sometimes employed by more than one employer; labour relations are not usually established through an employment contract; employers often do not know what their responsibilities are or how to comply with the law; the group has irregular wage income given the sector's high unemployment and job turnover rates; the number of hours worked varies considerably; payment is often in-kind (food, transportation, housing); workers sometimes reside at their workplace (live-in); and, in some cases domestic workers may be in an irregular status in the country, among other reasons. At any rate, voluntary registration clearly hinders institutional efforts to extend social security to this group.

Box 2. Labour inspection of domestic work

Domestic work presents a challenge for labour inspection. It is no coincidence that few countries around the world have specific policies and strategies for the implementation of this activity. Nevertheless, labour inspections are essential for the application and oversight of compliance with labour and social security laws.

In practice, labour inspection of domestic work poses several challenges associated with limited resources and inadequate legal support. The main issues include the difficulties in compiling information on possible violations given the high level of informality of labour relations; the lack of claims submitted by domestic workers; and the difficulty in accessing the workplace, which is the main problem.

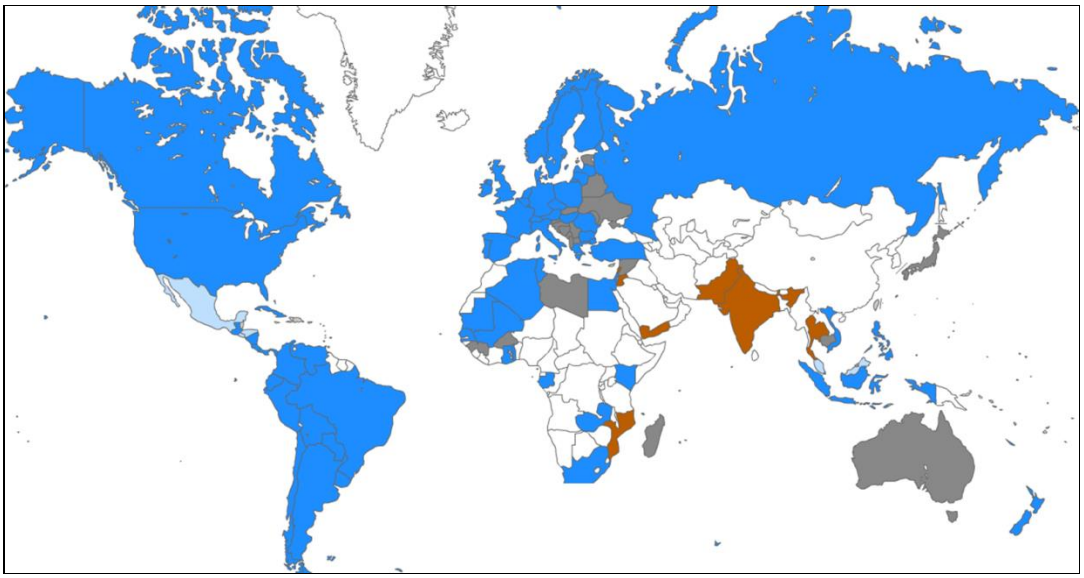
Access to private homes for labour inspections is generally prohibited by law given that it violates the principle of respect for private and family life. Consequently, inspectors must first get court approval to schedule a visit, in most cases. As important as private life is, it should not impede inspection visits, especially when there is a suspected violation of labour or social security laws. Some countries use alternative methods to supervise working conditions of domestic workers. For example, in Uruguay, the inspection team of the General Labour and Social Security Inspectorate (IGTSS) of the Ministry of Labour and Social Security (MTSS) may visit homes where domestic workers are believed to work. At the home, inspectors may interview domestic workers at the front door and request that employers provide documentation to verify that they are up-to-date with fulfilling their obligations. These visits also serve to share information on rights and responsibilities and to identify cases of abuse. Inspectors may not freely enter the home (which is possible in the case of firms); however, the inviolability of the private home is not absolute given that the inspector may enter the home after obtaining a court order. Ireland applies a similar mechanism, where the National Employment Rights Authority (NERA) requests permission via e-mail to enter employers' homes. If permission is denied, employers are asked to choose an alternative location to conduct the interview and verify documents.

Article 17 of ILO Convention No. 189 urges Member States to develop and implement measures for labour inspection, enforcement and penalties, in accordance with national conditions and laws. Additionally, the Labour Inspection Convention, 1947 (No. 81) states that it is essential for employers and workers to be fully aware of their respective rights and responsibilities in an effort to guarantee the effectiveness of labour inspectors' activities. This is difficult to achieve in practice, however. Incorporating strategies to disseminate information on and raise awareness of labour and social security rights is a key step in overcoming the limitations that labour inspection services face in this sector.

Source: ILO (2014), ILO (2012c) and ILO (2013a).

Figure 5 shows the distribution of countries with mandatory and voluntary systems, as well as those that do not offer coverage and where information is insufficient. The regions with the largest number of countries without coverage – and which are less likely to ratify international conventions – are Africa, Asia and the Middle East. In this last region, no country grants social security coverage to domestic workers. This trend is similar to that reported in other studies on labour laws, where the countries of the Middle East, Asia and the Pacific and Eastern Europe are among those with the most limited legal coverage (ILO, 2013a).

Figure 5. Countries with some provision for social security coverage of domestic workers, by type of programme (mandatory versus voluntary)



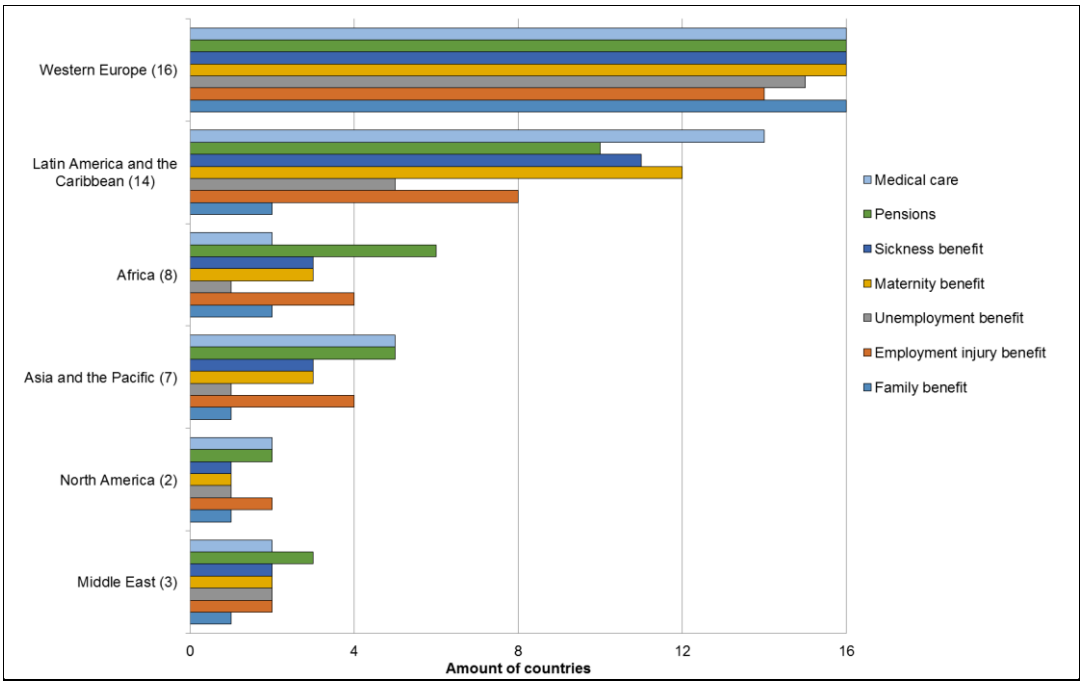
Source: Social Protection Department, ILO, Domestic Work Database.

Figure 5 also includes some countries that are implementing measures to strengthen legislation or to create new instruments to extend coverage. These include India, Kenya, Lebanon, Mozambique, Pakistan, Thailand and Yemen. In India, for example, the Unorganised Workers' Social Security Act was enacted in 2008. This is a special scheme for informal economy workers, which includes domestic workers. It has only recently been implemented and coverage of domestic workers is partial and limited to certain states of the country.

While many countries offer social security protection to domestic workers, this does not imply that they cover the same vertical dimension in terms of coverage. In other words, not all countries have provided for the same categories of social security branches established in Convention No. 102. At least 17 countries – located mainly in Western Europe and North America – provide the nine branches set forth in the Convention.

Figure 6 shows the number of countries of countries within each region whose laws mandate social security coverage of domestic workers for the different branches established in Convention No. 102. These indices do not measure effective coverage rates given that the information systems available in most of the countries still do not contain data for that aspect. Based on existing information, it is possible to conclude that gaps exist in the scope of legal coverage, and, consequently, in effective coverage. Coverage gaps are much more pronounced in developing countries. Crucially, while a country may guarantee coverage in its legislation, this coverage is not always adequate in terms of the populations included, qualifying conditions and levels of benefits. To the contrary: international experience reveals significant gaps in terms of the scope of national laws and their enforcement, even in countries where legal coverage exists. Furthermore, not all countries listed in Table 2 are considered in the results of Figure 6 given the limited information available. Nonetheless, the data presented offer a clear vision with respect to the main social security benefits included in legal coverage in each region, as well as existing gaps and challenges.

Figure 6. Number of countries with legal social security coverage for domestic workers, by contingencies covered and region



Source: Social Protection Department, ILO, Domestic Work Database.

European countries have established coverage in most branches of social security, except employment injury benefits, which are not covered in Ireland, or unemployment benefits, which are excluded in Spain (Ministry of Employment and Social Security, 2015). In developing regions, the main contingencies covered are medical care (contributory and non-contributory), disability, old age and survivors' pensions – the majority covered by social insurance programmes – and employment injury benefits. By contrast, family benefits and unemployment protection are the branches with the largest gaps in legal coverage. In the case of unemployment benefits, most are contributory programmes and are granted mainly in high-income countries. Nevertheless, there are some noteworthy programmes in developing countries such as South Africa, where domestic workers were incorporated in the Unemployment Insurance Fund (UIF) in 2003.

It is important to mention that in most of the countries studied, the contingencies covered by social security for the domestic work sector are the same as those provided to other employees. In cases where fewer contingencies are covered, employment injury and unemployment benefits are generally excluded. Likewise, the amount of benefits within a given contingency may vary for domestic workers, either because they grant a larger amount or because they vary in terms of the maximum benefit amount. Maternity benefits are frequently differentiated and lower for domestic workers.

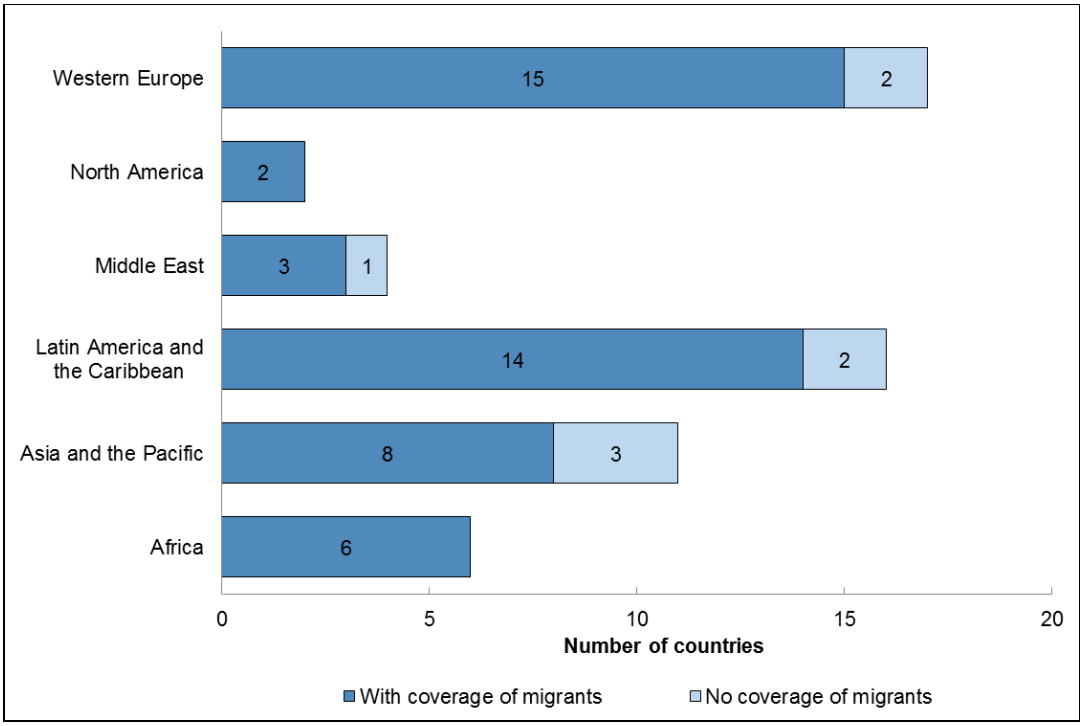
Migrant domestic work

A growing number of domestic workers are forced to leave their countries in search of better employment opportunities. In many countries, such as Italy or Spain, migrant domestic workers outnumber national domestic workers (Arango et al, 2013). The evidence indicates that the migrant population is more vulnerable given that workers generally work longer hours receive lower wages as compared with national workers. They also have more reported cases of sexual abuse and gender violence (D'Souza, 2010). For example, according to 2004 estimates, in Western Europe wages of migrant domestic workers were 24 per cent lower than those of national domestic workers (Gallotti, 2009).

This situation also occurs among workers of different nationalities who work in the same country, such as in Malaysia, for example, where some studies have found that Filipino domestic workers receive higher wages than their Indonesian counterparts (HRW, 2007).

Migrant domestic workers may be excluded from social security schemes even when they are legal residents of the destination country. Luckily in the majority of countries they can count on legal coverage by social security systems (Figure 7). Of course this situation is more complex in the case of irregular or seasonal migrants, who, due to their situation as foreigners or illegal aliens, often do not qualify for benefits from social assistance programmes. Figure 7 demonstrates that for 56 of the 70 countries identified in the study that provide coverage for the domestic work sector, at least 48 entitle migrant domestic workers to coverage.

Figure 7. Number of countries with social security provisions for domestic work, according to whether or not they include legal coverage for migrant workers (52 countries)



Source: Social Protection Department, ILO, Domestic Work Database.

In several countries that provide social protection for migrant domestic workers, access and coverage conditions differ and are generally less favourable as compared with those for national domestic workers. For example, in Singapore coverage by migrant domestic workers is on a voluntary basis whereas that of national domestic workers is mandatory. Another case is Israel, where migrant domestic workers have access to health insurance coverage only; in other words, protection does not include the range of benefits provided by the National Social Security Institute (BTL).

In most cases, migrant workers must have a work permit and update their migratory status regularly to be able to register for social security schemes. In general, developed countries have more access requirements.

Some countries have ratified bilateral and multilateral social security agreements that include among others clauses for the portability of benefits or the totalling of the number of contributions across countries, especially for old-age pensions. This means that the entitlements accumulated in one of more territories, whether benefits or contribution periods, must be guaranteed to the migrant worker in another ratifying territory (ILO,

2013b). This situation is crucial for income protection when workers finally return to their home countries; nevertheless, it needs to be pointed out that these practices are still incipient around the world.

I.7. Effective social security coverage for domestic workers

Social security systems in developing and emerging countries face the greatest challenges in extending social coverage to domestic workers, both in terms of the recognition of the right in national law as well as in the effective enrolment in programmes (effective coverage). Although legal social security coverage of domestic workers is 100 per cent in many countries, in practice, only a fraction of domestic workers pay contributions to social security systems.

The factors that determine effective coverage rates of domestic workers are quite varied and complex. They may interact and have diverse effects, depending on the level of development of the social protection system in each country, as well as on institutional and cultural considerations, among others.

The factors that determine effective social security coverage for domestic workers are listed below. It is important to point to the lack of scientific studies on the relative importance of the different factors.

(a) The mandatory or voluntary nature of legal coverage;

(b) The contributory capacity of employers and workers;

(c) The scope of the legal and institutional framework associated with the capacity to exercise contributory control, mandatory compliance and inspections;

(d) Workers' capacity to negotiate with employers (which is associated with legal and administrative support, the degree of familiarity with rights and access to effective complaint mechanisms, among others);

(e) Ease in practice of social security registration procedures;

(f) Ease of making social security contributions;

(g) Intensity of the use of information technologies (to bring services closer to the population and to simplify them);

(h) Vertical coverage (contingencies covered and level of benefits);

(i) Perception of the quality of services and benefits provided by social security institutions;

(j) The level of organization and association of domestic workers, which influences their ability to make and obtain demands;

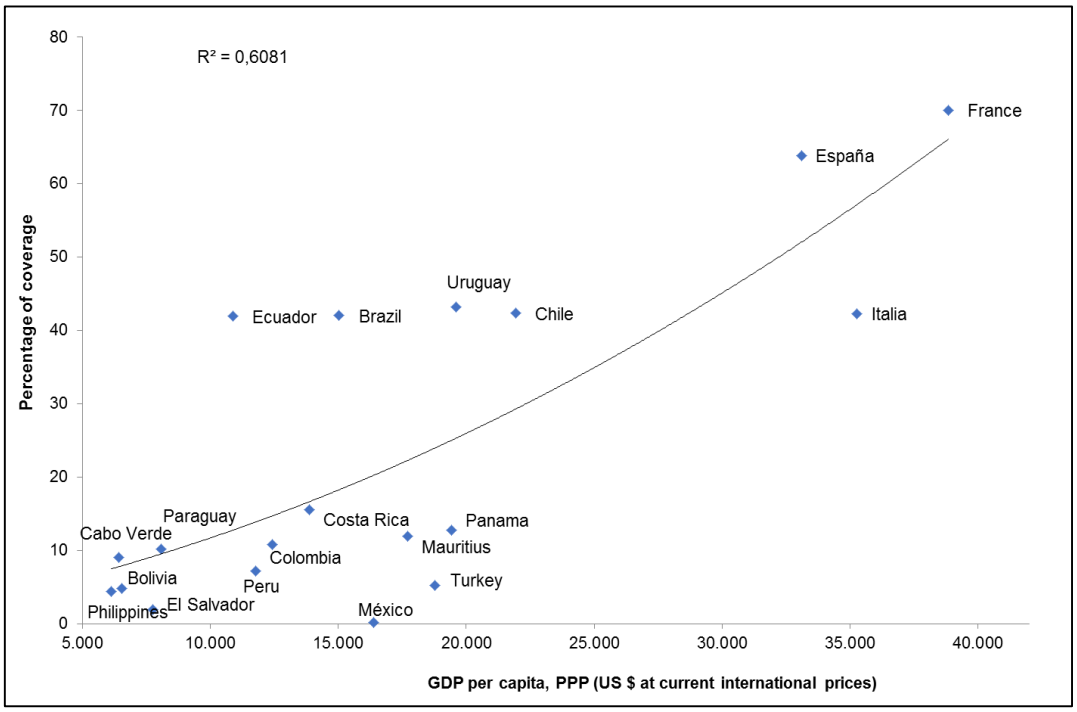
(k) The level of social awareness (civic culture) regarding the importance of social security; and

(l) Differences in the treatment of migrant workers.

It is widely recognized that good institutional governance plays a key role in achieving high levels of social protection for difficult-to-cover groups. This is a relevant issue discussed throughout this report. Figure 8 provides information on the rate of

effective coverage for 19 developed and developing countries in five regions, and their relationship to the countries' income levels. Although access to effective coverage data is quite limited, available information points to some trends and regularities.

Figure 8. Estimates of the effective rate of social security coverage for domestic workers, by GDP per capita, for selected countries (last available year)



Source: Social Protection Department, ILO, Domestic Work Database.

Figure 8 demonstrates the clear positive relationship between the effective coverage rate, in other words, the percentage of domestic workers who are actually registered as social security contributors, and the GDP per capita. However, in countries with GDP per capita below US$ 10,000, that relationship was not sufficiently clear, which supports the idea of the existence of widely diverse determinants.

Figure 8 shows a high dispersion in coverage levels among countries with GDP per capita ranging from US$ 15,000 to US$ 20,000, with rates from 10 per cent to 40 per cent. The differences in coverage levels among countries of similar income reflect the diverse levels of development of social security systems, which ultimately determines the capacity to apply strategies designed to increase coverage. Mexico and El Salvador are the only countries in this study that have voluntary insurance to protection schemes, as well as the ones with lowest effective coverage rates. However, El Salvador launched its voluntary protection scheme beginning in 2010 through the Special Health and Maternity Scheme for Domestic Workers.

Another conclusion that can be drawn from this figure is that even though statistical representation is limited, developed countries with similar levels of GDP per capita, such as Italy and Spain, not only have a limited effective coverage rate, considerably below 100 per cent, but also exhibit significant differences in coverage: 42 per cent in Italy (similar to developing countries such as Ecuador, Uruguay and Chile) versus 68.5 per cent in Spain. Interestingly, Spain has a high percentage of domestic workers from Latin America while the migratory influx to Italy originates mainly from Mediterranean countries.

I.8. Barriers to extending coverage

As discussed in previous sections, domestic workers face multiple barriers for accessing legal and effective social security coverage. Many of these barriers are related to the characteristics of domestic work, such as the fact that tasks are performed in a private home, or that the employer is assumed to be a household without productive or business aims. This section summarizes the main institutional barriers identified. Future studies should be based on information that comes directly from workers and employers, obtained through specialized surveys or other instruments, in an effort to gain a deeper understanding of the barriers.

Legal exclusion. Legal exclusion is the most daunting barrier for upholding domestic workers' right to social protection. When laws are discriminatory, a population group that due to its characteristics is already vulnerable becomes even more so. For example, in Thailand, the Social Security Law (1990) specifically states that domestic workers are not eligible for social security.

In addition to legal exclusion, other barriers limit domestic workers' access to social security coverage. Some of the most significant constraints are listed below.

Voluntary coverage. Access to social security is a right that every worker should have, which in practice does not necessarily occur. Voluntary coverage is ineffective because it burdens domestic workers with the difficult task of convincing their employers to register them in a social security programme.

Coverage is limited to fulltime workers. This is a major hurdle given that many domestic workers are employed part-time, by the day or by the hour. In Turkey, only full-time employees are eligible for social security through the Social Security Institute (SGK).

Restrictive definition of domestic work in legislation. In some cases, national legislation, whether at the level of the labour code or of social security laws, narrowly defines salaried domestic work in terms of the household tasks it entails. This hinders the inclusion of some occupational groups that perform domestic work, such as gardeners, security guards, private drivers and those who care for pets. The definition of domestic work categories established in Convention No. 189 serves as a policy guide for countries to adapt their legislation accordingly.

Limitation of protected contingencies. In some countries, the social security system offers differentiated coverage (contingencies or branches of social security covered) for difficult-to-cover groups such as domestic workers, which is usually less than that offered in the general scheme. Family and unemployment benefits are most often excluded. In some developing countries, coverage is limited to pensions (invalidity, old-age and survivors' benefits). In others, the scheme offers lower benefit amounts, affecting mainly the short-term transfer of cash in the case of sickness and maternity benefits.

These practices occur most frequently in countries that have opted for special protection schemes for domestic workers, although they are also observed in some countries where the domestic work sector is included in the general scheme.

Exclusion resulting from the characteristics of domestic work. In some countries, social security schemes establish differentiated access conditions for domestic workers, which are usually associated with the nature of labour relations. While some of the conditions could be considered good practices, since they are designed to create incentives for registration and payment of contributions, others act as barriers to social protection access for this group of workers.

For example, in some schemes, workers must meet a minimum threshold of earnings to be able to access some social security benefits, such as in the United States or in the Philippines. In the latter country, workers must earn at least 1,000 pesos (US$ 23) monthly and must be less than 60 years old to exercise the right to coverage for sickness or maternity benefits. This requirement is not applicable in the case of employment injury coverage, however.

Some systems also require a minimum number of hours worked with a single employer to access social security. This is one of the main limitations for the extension of social protection to domestic workers in developed countries (ILO, 2012b). In countries like Italy, for example, domestic workers who work less than four hours a day for the same employer are not eligible for social security coverage; a similar rule is applied in the Netherlands, where domestic workers are excluded from social security when they work less than four days per week for the same employer. [2]

Differentiated requirements for access to some contingencies also exist in developing countries, such as South Africa, where domestic workers must work at least 24 hours per month to receive sickness benefits, and in Panama, where they have a right to sickness benefits only if they work more than 24 hours per month.

These types of provisions act as exclusion factors for social security access. At the same time, however, they enable systems to establish a minimum financial base, thus countries should strive for an adequate balance in their definition.

Contribution rates equal to those of other occupational categories. The establishment of a contributory scheme equal to that for other employees is another impediment to inclusion of domestic workers in social security systems. According to the experiences analysed, this strategy is not very effective when dealing with difficult-to-cover groups, such as domestic workers, which in addition to having a low contributory capacity are often paid in-kind.

In some countries, the structure of contributions includes payments that do not generate benefits for domestic workers, which increases costs and discourages registration (like may be the case of some contributions by employers earmarked to finance other social benefits and programmes).

Complexity of administrative procedures. Burdensome administrative procedures increase transaction costs for employers and domestic workers alike in terms of the time invested in complying mainly with procedures of registration and regular payment. Procedures that are burdensome, costly or difficult to understand (for example, complexity in the application of contribution rates) act as disincentives to registration. The situation tends to be less favourable when employers must deal with a fragmented administrative model, where they are required to transact with several institutions rather than a single, centralized one.

Inadequacy of administrative mechanisms for registration and receiving benefits. The specific characteristics of the domestic work sector in comparison with other economic activities require social security schemes to adapt administrative mechanisms to the needs of this sector.

The absence of mechanisms to register workers who work on an hourly basis, those who have more than one employer and those who work abroad, for example, exclude this

[2] Even under these conditions, domestic workers in the Netherlands enjoy minimum legal standards such as the minimum wage and holidays, among other rights.

population from access to social security benefits. This situation can be resolved through legal and administrative reforms, which incorporate the intensive use of technological resources combined with incentives for enrolment, including financial incentives.

Benefits under the responsibility of employers. In some social security systems, employers are directly responsible for covering costs for certain benefits, particularly sickness and maternity benefits.

Lack of information and organization. When individuals are unaware of their rights and responsibilities and of how to exercise them, it is more difficult for these workers to actively exercise them. Additionally, the lack of information amplifies the asymmetrical position and puts workers at an even greater disadvantage in negotiations with employers. This mainly affects groups of highly vulnerable workers, such as domestic workers. The situation is even worse for migrant domestic workers. The dissemination of information to the domestic work sector can be beneficial as it has proven effective in countries that have employed this strategy, such as Argentina and Uruguay. Entities involved in social security administration can also contribute to strengthening organizations of domestic workers as well as of employers of domestic workers. These organizations can be an effective channel for disseminating information and promoting rights.

Part II. Description and practices of social security schemes for the domestic work sector

II.1. Description of social security schemes

The information and analyses presented in previous sections of this report demonstrate that countries differ significantly in terms of practice regarding the establishment and application of social security schemes for the domestic work sector. This section presents an approach to a classification of social protection schemes for domestic workers, which was developed based on an analysis of the countries. Table 3 attempts to systematize some typical characteristics of the main types of schemes.

Table 3. Classification of social protection schemes for domestic workers

Legal configuration	Institutional organization	Financial aspects	Registration	Examples of countries
■ Mandatory coverage ■ Domestic workers included in wage employment category	■ General scheme ■ Unified administration /collection	■ Undifferentiated contributions	■ Only full-time domestic workers ■ Single-employer	Cape Verde Ecuador Mauritius Turkey
■ Mandatory coverage ■ Domestic workers included in wage employment category	■ General scheme ■ Non-unified administration/ collection	■ Differentiated contributions	■ Only full-time domestic workers ■ Single-employer	Costa Rica Philippines
■ Mandatory coverage ■ Domestic workers included in wage employment category	■ General scheme ■ Unified administration /collection	■ Differentiated contributions	■ Multi-employer ■ Part-time ■ Service voucher (Belgium, France, Switzerland)	Argentina Uruguay Italy Spain Belgium France Geneva, Switzerland
■ Voluntary coverage ■ Domestic workers not included in wage employment category	■ General scheme ■ Unified administration /collection	■ Undifferentiated contributions	■ Only full-time domestic workers (single-employer)	Malaysia Singapore
■ Voluntary coverage ■ Domestic workers not included in wage employment category	■ Special scheme ■ Unified administration /collection	■ Undifferentiated contributions	■ Only full-time domestic workers (single-employer)	El Salvador Honduras Mexico

Source: Social Protection Department, ILO, Domestic Work Database.

There are five most frequent types of social protection schemes for the domestic work sector. The classification covers certain key components of pertaining to the design of these systems which were divided into four categories: legal configuration, institutional organization, financial aspects and enrolment.

In terms of legal configuration, it is useful to determine whether social security schemes provide mandatory or voluntary coverage, and whether they consider domestic work as an occupational category equal to that of other categories of wage employment. The institutional organization category differentiates schemes according to whether domestic workers are included in the general scheme or in a special programme and whether or not the scheme has a centralized administration and collection system.

Financial aspects focus on whether the contributory scheme differs from that of other employees. Finally, the enrolment category distinguishes schemes by their capacity to incorporate domestic workers who have more than one employer (multi-employer) and those who work part-time.

International evidence demonstrates that countries in the third category (Argentina, Uruguay, Italy, Spain, Belgium, France and Switzerland (Canton of Geneva)), have the highest effective coverage rates as compared with the countries in the other categories. Key differences in systems include the existence of a differentiated contributory scheme and a scheme that allows for the registration of workers with more than one employer and those who work part-time. However, it should be noted that other elements also differentiate the systems, most of which are mentioned in Section I.7.

II.2. Practices in extending coverage to domestic workers

The aim of this section is to systematize international practices based on the experiences of a selected group of countries that have successfully extended social security to domestic workers. This systematization can serve as a reference for other countries that want to improve their social protection schemes to cover the domestic work sector.

To this end, the practices identified were classified into five categories: (1) aspects of institutional organization; (2) financing; (3) enrolment and promotion of coverage; (4) collection and contribution payment; and (5) coverage of migrant domestic workers.

Practices include policies and strategies associated with the design and overall functioning of the social security system of each country, as well as strategies especially designed by institutions specifically for the domestic work sector. It is noteworthy that the structure of the social security system and its institutionalization are important but are not necessarily the only determinants for achieving high social protection coverage of domestic workers.

Consequently, it is important to highlight that policies and strategies to extend social security to domestic workers should be seen as part of a larger set of policies designed to formalize employment. As a whole, they form a system of employment protection for the domestic work sector, which includes several components beyond the specific characteristics of the social protection system. Elements that define that broader range of policies include:

(a) Minimum wage legislation and other wage policies (for example, regulations on in-kind payment) in general, and for domestic workers in particular;

(b) Legislation and policy on working hours;

(c) Legislation and guarantees for occupational health and safety;

(d) Maternity protection for the domestic work sector;

(e) Compulsory capacity for guaranteeing rights through the strengthening of the labour inspection system;

(f) Access to information on rights and guarantees for labour protection;

(g) Promotion of unionization and organization in general (creation of workers and employers associations); and

(h) Promotion of social dialogue among actors associated with the domestic work sector.

According to the vision of the ILO, most of these complementary or interrelated policies form a strategy to promote decent work and inclusive development based on the Declaration on Social Justice for a Fair Globalization (ILO, 2015b).

II.2.1. Aspects of institutional organization

Mandatory coverage. Domestic work is an activity that poses relatively many difficulties in terms of registration in social security programmes. International evidence suggests that the mandatory nature of enrolment plays a key role in extending coverage. Data compiled for this study demonstrate that 89 per cent of countries with some type of social security coverage for domestic workers have implemented mandatory coverage. In effect, the highest rates of effective coverage, in terms of proportion of these workers registered in social security schemes, are directly associated with the mandatory nature of coverage.

Nevertheless, mandatory coverage for domestic workers is insufficient for reaching satisfactory levels of effective coverage. Experience indicates that mandatory enrolment should be accompanied by complementary measures, most of which are discussed below.

Interinstitutional coordination. International experience suggests that coordination among the institutions responsible for implementing the different functions of social security is crucial for guaranteeing a certain level of effectiveness.

Positive results associated with increased inter-institutional coordination include simplified administrative procedures that employers and workers are required to carry out; increased administrative efficiency and effectiveness (including reducing administrative costs of the system); increased transparency in programme management; and access to information to enable improved strategy design to extend coverage (Schwarzer et al, 2014). Thus, inter-institutional coordination is a necessary but insufficient condition for extending coverage to domestic workers.

Some countries in the study had put in place clear coordination mechanisms among institutions in-charge of social security administration as well as among other government entities such as ministries of labour, social development, finance, migration, gender equality or their equivalent, as well as among statistics institutes. Noteworthy examples include Argentina, whose social security institutes coordinate closely with the Ministry of Finance; and Uruguay and Singapore, which collaborate with the Ministry of Labour.

The participation of each of these institutions in strategies to extend coverage is explained throughout this section. In the case of the Ministry of Finance, for example, the increased institutional linkage with social security institutions helps advance in the strengthening of contributory control strategies and other innovative measures such as Argentina's provisions for contributions based on presumptive income.

Unionization of domestic workers. Domestic workers generally have limited individual and collective bargaining power given that their workplace is a private home and they have no co-workers. This situation makes it difficult to meet with other domestic workers to exchange experiences and information and to organize themselves collectively. This leads to an environment of vulnerability, which results in lower wages in comparison with other sectors or groups, long working hours and abusive treatment, among other working conditions that fall far short of the concept of decent work.

The establishment and strengthening of workers' organizations in the domestic work sector are needed to reduce vulnerabilities that those workers confront. Organizations and unions can play a fundamental role in defending labour and social security rights through

the active participation in decision-making at the national level or through the creation of social dialogue mechanisms.

In Italy, for example, unions assumed responsibility for negotiating aspects of labour rights on behalf of domestic workers, including the setting of wages. In France, unions receive a percentage of employers' contributions to finance organizations and to expand social dialogue (ILO, 2013c). In these experiences, the adoption of collective agreements represented a key strategy for achieving high levels of participation.

In developing countries, union membership is quite limited. For example, for a selected group of Latin American countries, an estimated 1.5 per cent of domestic workers belonged to a union in 2013 (ILO, 2015c). Nevertheless, some countries of the region have active organizations of the domestic work sector, such as the Domestic Workers' Union of Uruguay, the National Federation of Household Wage Workers of Bolivia, the Association of Domestic Workers of Costa Rica and the National Domestic Workers Union of the Dominican Republic, among others.

II.2.2. Financing aspects

Differentiated contributory provisions. As mentioned, efforts to incorporate the domestic work sector in social security schemes presents major challenges, including notably the limited contributory capacity of the sector. Given the atypical work relationship, the fact that the employer is a household or an individual is a natural barrier in terms of contributory capacity, and even in terms of the willingness of employers to assume that role.

In response to this and other conditions, social security schemes should establish strategies that incorporate differentiated contributory provisions, applying lower contribution rates for domestic workers (employer and worker) and for other groups with low contributory capacity. This, together with the creation of other incentives for enrolment, including fiscal incentives, can favourably influence the effective rate of registration. In accordance with the principles of solidarity and equity that guide social security, the differentiated contributory provisions should not affect the type or amount of benefits domestic workers receive. Governments can assume a key role in subsidizing contributions.

Differentiated contributory provisions are applied mainly through two mechanisms: (1) by reducing the percentage of contribution or the amount of the contributions to the different social security schemes, such as in Israel; or (2) by creating a specific contributory provisions that is more favourable for domestic workers. In the latter case, some systems calculate the contributions based on an hourly wage, such as in Argentina or Italy, to enable increased flexibility in the application of the mechanism in cases of part-time or multi-employer employment.

Government subsidies. Another way to overcome the barrier of the low contributory capacity in the domestic work sector – which as mentioned can affect both employer and worker –, is through direct government subsidies to complement contributions.

Government transfers can be designed to subsidize contributions of all domestic workers or only those with low contributory capacity. In the latter case, subsidy levels can vary in an inverse relationship with contributory capacity, in other words, the lowest-earning workers – and their employers – benefit by receiving a higher percentage of subsidies for their contributions. This strategy requires effective measures for control of contribution payments to prevent employers from opting to under-report wages to inappropriately benefit from the subsidies.

In all cases, subsidies are designed to create more incentives for social security enrolment by reducing the contributory burden. Depending on the model chosen, international practice indicates that subsidies can favour both worker and employer, or the worker only.

Subsidies can be part of a strategy that incorporates all employees (and own-account workers) or only difficult-to-cover groups, such as domestic workers. For example, in Costa Rica, the government subsidizes a percentage of the social security contributions of domestic workers and their employers to the CCSS (Costa Rican Social Security Institute). All contributing employees receive the subsidy. The total contribution rate is 34 per cent (below the 36.5 per cent corresponding to a regular employee), where the employer contributes 24.17 per cent, the worker 9.17 per cent, and the government, 0.66 per cent. Given that the effective coverage of domestic work achieved by the CCSS is modest compared with other developing countries, the current subsidy rate appears to have been inadequate for achieving the desired objective. This subsidy would need to be revised and complemented with a set of other measures. At the time this report was written, Costa Rica was discussing alternatives.

In Turkey, the contributory provision includes a government subsidy for health insurance and pensions administered by the Social Security Institution (SGK, Sosyal Güvenlik Kurumu). Employers and workers of all types of occupational categories benefit from the subsidy, including domestic workers.

Fiscal incentives. Domestic work is atypical, among other reasons because the employer is a private household or a private individual, so the employer does not have an economic gain or commercial interest associated with the tasks performed by the worker. Under these circumstances, fiscal incentives to favour enrolment can play an important role. Hence many countries employ this strategy.

Various forms of fiscal incentives in practice are observed. The most common are:

– Implementation of employer contributions as income tax-deductible expenses. Some countries such as Germany and France (see Box 3) have established limits on the amount of deductible expenses.

– Reduction of the tax rate for employer when the domestic work contract is for full-time employment.

– Reduction of a percentage of contributions for employers who have made timely payments for a specified period. In Ecuador, employers who have contributed for five years in a timely manner receive a bonus or incentive: the Ecuadorean Social Security Institute (IESS) exempts them from paying administrative costs for three months, which equals 0.44 per cent of the reported wage.

– Reduction of the contribution rate for employers who participate in the service voucher system, such as in Belgium and France (ILO, 2013c).

Deductions or contributory exemptions. Closely related to the aforementioned aspect, since it is often difficult for domestic workers to pay contributions, they frequently prefer not to be enrolled in social security to avoid the respective contribution payments. Some social security schemes exempt domestic workers from payments under certain circumstances. In some cases, the contributory provision mandates employers to assume the full social security contributions, or domestic workers may make voluntary contributions, such as in Argentina.

Additionally, some developed countries have established contributory exemptions for employers who have fulfilled certain pre-requisites, for example, by being over a certain

age – 70, for instance –, socioeconomically vulnerable and social programme beneficiaries, among others. This strategy facilitates domestic work services to vulnerable populations, and helps to reduce gaps in care service delivery by the State, among other objectives.

Contributions by employers only. As an alternative strategy to address the problem of low contributory capacity, some social security schemes establish the obligation for employers to assume responsibility for the payment of all social security contributions when workers earn a wage below a certain threshold. In the Philippines, for example, when domestic workers earn less than P 5,000 (approximately US$ 110 per month), employers are responsible for paying the full contributions to the Social Security Institute (SSS), one of three contributory schemes for workers.

The Costa Rican Social Security Institute (CCSS) implements a similar measure through a contributory provision based on a minimum contributory wage, which was 131,760 colones (approximately US$ 239) in 2013. Under this system, if the reported wage is below the minimum contributory wage, the employer is responsible for paying the difference between the reported wage and the minimum contributory wage in effect. It is important to note that this contributory strategy has the disadvantage of not taking into account that a large share of domestic work employers, particularly in the developing world, frequently are unable to assume these contributions, which ultimately leads to more social security evasion by employers, frequently with the knowledge of their workers.

Contribution based on hourly wage. Unlike other activities, the domestic work sector has a large share of workers who work by the hour or part-time. This has led many social security schemes to adjust their administrative provisions to facilitate the inclusion of domestic workers in social security programmes, especially when the goal is to achieve certain minimum levels of contributions.

In light of the above, implementing traditional contributory provisions without adapting them to the specific characteristics of the domestic work sector may create a barrier for many employers and workers of the sector. In response, some countries such as Argentina and Italy have implemented contributory provisions based on the hourly wage, or by intervals of hours worked.

In Italy, the National Social Security Institute (Istituto Nazionale della Previdenza Sociale (INPS)) established a contributory provision based on intervals of the hourly wage (Table 4). Contributions are absolute amounts expressed in euros. This provision is different from that applicable to most Italian employees, who unlike domestic workers, contribute based on the nominal wage reported and the contribution rate (combined employer and worker), which is more than 40 per cent of the wage and thus many domestic sector employers and workers find it difficult to achieve.

Table 4. Italy: Contributory provision for domestic workers based on the hourly wage, 2015
(contributions in euros)

Hourly wage	Total	Employer	Worker
Up to 7.88 euros	**1.39**	1.04	0.35
More than 7.88 euros and up to 9.59 euros	**1.57**	1.18	0.39
More than 9.59 euros	**1.91**	1.43	0.48
Work more than 24 hours per week	**1.01**	0.76	0.25

Note: The contributory provision has a special feature with regard to the financing of family benefits. When the worker is the spouse of the employer or third-degree relative or less, the employer's contribution is higher.

Source: INPS, 2015.

For example, if a domestic worker in Italy earned 10 euros per hour in 2015, the contribution rate per hour worked would be 1.91 euro, to be paid jointly by the worker and the employer. According to this provision, the higher the domestic worker's hourly wage, the higher the contribution rate. This creates a progressive scale for financing social security.

The INPS of Italy established an additional contributory category for domestic work contracts of more than 24 hours weekly, which offers even lower contribution rates. Since domestic work employers must hire workers by the hour or part-time to save costs, this practice can help create incentives for employers to hire domestic workers for longer workdays.

Differentiated contribution based worker's age. Older workers are frequently displaced by younger ones, particularly in occupations such as domestic work, where the conditions and physical efforts required are important in terms of productivity. Some social security systems have opted to implement contributory provisions with different contribution rates depending on the worker's age, which favour older workers to discourage this practice, giving employers a contributory advantage when they hire older workers.

Thus, the application of this differentiated mechanism creates a contributory provision of solidarity according to age: younger workers contribute based on a higher contribution rate as compared with workers who are closer to retirement age.

The use of the differentiated contributory provision by age may vary across systems. For example, in Singapore, the Central Provident Fund (CPF) establishes a contributory provision based on five age groups, ranging from 50 years or less to workers over age 65 (CPFB, 2014) and earnings level. [1] This provision is similar to that applied to other employees. For the youngest group with total wage over Singapore $ 750 (approximately US$ 526), a global contribution of 36 per cent (16 per cent paid by the employer and 20 per cent by the employee) is applied, whereas workers over age 65 benefit from a much lower rate of 11.5 per cent (6.5 per cent paid by the employer and 5 per cent by the worker).

Similarly, in Argentina, the National Social Security Administration (ANSES) established a differentiated contributory provision for domestic workers, which combines an hourly wage provision with an age-based provision (Table 5). This provision uses absolute amounts of contributions expressed in Argentine pesos and not contribution rates. Contributions are the exclusive responsibility of the employer.

ANSES defines three age groups: over age 18; over age 16 and under age 18, and retired workers. This provision does not offer differentiated contributions but some age groups are not included in specific schemes. For example, workers under age 18 do not contribute to the pension system while retired domestic workers are excluded from the health insurance.

[1] This scheme is the same one applied to other employees who are Singapore nationals.

Table 5. Argentina. Contributory provision for domestic workers based on the hourly wage and age of the worker (in Argentine pesos per month)

Age and hours worked per week	Total	Health insurance	Pension system	Employment injury benefit
Workers over age 18				
Less than 12 hours	**161**	19	12	130
From 12 to 15 hours	**224**	35	24	165
16 or more hours	**498**	233	35	230
Workers under age 18 and over age 16				
Less than 12 hours	**149**	19	–	130
From 12 to 15 hours	**200**	35	–	165
16 or more hours	**463**	233	–	230
Retired workers				
Less than 12 hours	**142**	–	12	130
From 12 to 15 hours	**189**	–	24	165
16 or more hours	**265**	–	35	230

Source: AFIP, 2014.

Contribution based on household composition. A measure related to financing is the differentiation according to the composition of the worker's household. In this provision, contributions may vary if the worker has a spouse or children.

In Uruguay, in the National Health Insurance System social security contributions depend on the worker's household composition. In this case, contributions are higher when the domestic worker has a spouse or dependent partner and children (ILO, 2013d). Clearly, this measure seeks to promote formalization and employment of younger adult domestic workers.

II.2.3. Practices regarding registration and promotion of social security coverage

Administrative procedures under the responsibility of the worker. In all social security systems, the time and resources invested in administrative procedures for registration and periodic payment of contributions are considered transaction costs. If these costs are or are perceived as high, it is not surprising that they will be a disincentive to participation. Although the domestic work employer is an atypical employment contractor – since the employer is often also a worker, enrolment procedures are normally the same for domestic workers as for other workers: employers are responsible for registering themselves and their workers and for deregistering them, as well as for making changes in the reported wage, among other procedures. These transaction costs assumed by employers may represent a barrier and be a disincentive to enrolment. In response, some social security schemes have created alternative mechanisms to reduce employers' transaction costs, which end up burdening workers with all or most of the administrative procedures.

In Spain, workers who provide services to the employer for less than 60 hours per month are responsible directly for making changes to the registration and wage information, with prior agreement with the employer. Changes may include the reference wage, removal from the registry and modification of the number of hours worked, among others. All modification requests must be signed by employer. This measure lowers

employers' transaction costs and therefore can be viewed as an incentive for social security enrolment. A related advantage is that it allows the worker to act as a permanent auditor of the information registered with the social security administration. However, it does have the disadvantage of burdening the worker with administrative responsibilities that should be at least shared with the employer. This would seem reasonable given that employers frequently have a higher educational level and more resources than workers, making it less burdensome for them to file paperwork with the social security administration.

Multi-employer and part-time work provision. Domestic workers normally work partial days or by the hour, and frequently for more than one employer (multi-employer provision). These conditions pose a challenge for extending social security in the domestic work sector, so innovative strategies are needed.

To overcome these difficulties, some countries, including France, Italy and Colombia, have implemented provisions to facilitate the registration of workers who are employed by more than one employer or who work part-time. The first provision allows workers to register the contributions of more than one employer simultaneously whereas the coverage provision for part-time work aims to give workers the opportunity for social security coverage despite working only some hours a week or days a month.

In practice, both provisions require administrative modifications, including new software programmes. For example, the registration can be promoted by changes in the design of provisions for contribution, specifically in the definition of contributions, or through adjustments to enrolment and payment procedures. No single implementation method exists. Some of the measures applied to implement the multi-employer or part-time work provision include: the use of service vouchers in France and Belgium; differentiated contributions in Italy; collection by pay periods in Mauritius; or the application of employer identification systems in Colombia and Ecuador.

In France and Belgium, social security institutions use service vouchers. These are means of payment which, besides creating fiscal incentives, facilitate administrative conditions for access. In Italy, the Istituto Nazionale della Previdenza Sociale (INPS) created a differentiated contributory system for part-time domestic workers. In that system, employers and workers contribute based on intervals of hourly wage, although there is an established minimum number of hours of work per week.

Mauritius has an interesting experience with provision for insuring for part-time domestic work. The Social Security Ministry of that country established several minimum contributory wages, which vary by wage payment periods: daily, weekly, bi-monthly or monthly. Thus, employers and workers contribute according to the contract period established within the month. In countries such as Colombia and Ecuador, social security institutions have incorporated a system to identify employers, which includes the multi-employer provision. This identification system assigns a special identification number to each employer, through which workers can declare more than one employer on the contribution forms they submit to the social security administration.

Education and awareness-raising of domestic workers and their employers. The development of a social protection culture is essential for raising civic awareness on the human right to social security. When citizens are better informed on the benefits associated with social security coverage, they will be more interested in defending their labour rights and more willing to enrol in social security. Measures to strengthen education and civic awareness on social security are listed below:

(a) Incorporate civic education on social security in education programmes for all ages;

(b) Provide information to the public through the mass media, taking advantage of the different media: radio, television and the press, web pages and specific social marketing campaigns, in an effort to disseminate the advantages of social security registration;

(c) Publish special newsletters on domestic work, which provide basic information on schemes and benefits offered by the programmes, as well as on required registration procedures;

(d) Develop linkages with organizations of domestic workers, employers, unions and other civil society groups to facilitate the dissemination of information; and

(e) Implement decent work campaigns for domestic workers, developed in coordination with social security institutions, ministries of labour and civil society organizations, among others.

Following the enactment of Law 18.065 in Uruguay, which strengthens among others, social security coverage of domestic workers, the country launched a series of information campaigns on the changes the law introduces. The strategy included the distribution of pamphlets on the rights of domestic workers, handbooks explaining social security enrolment procedures and materials explaining the use of the web page and other online services available to facilitate enrolment in the social security institution (Banco de Previsión Social-BPS). In Colombia, the Ministry of Labour published a brochure on labour rights and social security of domestic workers designed for workers and their employers. Audio-visual materials were also prepared to complement the brochure.

In another context, Ecuador promoted a campaign of dignified domestic work (2010), through which 260 mobile points were established in the leading cities to respond to information requests of domestic workers and their employers.

Use of information technologies. Social security institutes have been advancing in the use of information and communication technologies (ICTs) improve the administration which has resulted in offering new and better administrative services. Some of the most common include the use of mobile applications on smartphones to enable employers to administer the registration of their workers, pay contributions, change reported wages and update information, among other functions, using their smart phones.

Another successful practice in this area is the integrated call centre that links social security administrations and labour ministries to provide online consultations for domestic workers and their employers. For example, Uruguay and Italy incorporated free telephone services to respond to information requests on issues related to the social protection of domestic work.

Inspection service. Inspection services in the domestic work sector are crucial for guaranteeing compliance with social security law. They provide direct institutional support for compliance with labour law through mechanisms for prevention and information activities and issuance of fines. Box 2 describes experiences in Uruguay and Ireland on this aspect.

Courses for employers. In Singapore and other countries, institutions have implemented courses for employers of domestic workers. The successful completion of these courses is in some cases required for registering a domestic worker with the Ministry of Labour or in social security institutions. These virtual or in-person courses provide information on the rights of employers and workers, setting of wages and filing of complaints, among other subjects.

Advisory services. Often, domestic workers are not well informed on their right to social protection. Even if they are aware of this right, they may not even know how to demand this right or have doubts about how or be afraid to do so. Employers of domestic workers may also have similarly limited knowledge. In an effort to address this problem, social security institutions can create programmes or campaigns to inform domestic workers and their employers on rights and responsibilities associated with social security.

Uruguay developed a free legal advisory programme on labour and social security legislation for domestic workers and their employers. Advisory services are provided through one of the country's leading universities, with support from the social security institution (the BPS) and from organizations of workers and employers.

Access to loans. Frequently, individuals enrolled in social security administrations require incentives and a higher level of trust in these institutions. Institutions that administer social security could favor the establishment of a system for personal loans and mortgages for workers registered in contributory programmes to build this trust. Ecuador, Malaysia, the Philippines and Costa Rica have implemented such measures. However, it is important to proceed cautiously in applying these measures, to avoid affecting negatively the sustainability of social security funds.

II.2.4. Collection of contributions

In social security systems, the functions of collecting contributions are critical areas that require adequate management to extend contributory coverage and improve programme sustainability. Domestic work includes several forms of employment. Many domestic workers work for several employers, or frequently change employers, which complicates the task of collecting contributions. Some relevant practices with view to extending effective coverage of the domestic work sector are presented below.

Single and centralized collection system. There is broad consensus about the need to establish single centralized collection systems given their advantages over decentralized or fragmented systems. In general, the enrolment and collection systems are integrated to facilitate registration and contribution collection.

Centralizing the collection process in a single institution has been successfully implemented mainly in developed countries such as Ireland, Sweden and the United Kingdom, as well as in a few developing countries, including Costa Rica and Uruguay (ISSA, 2011). The system can operate in the same institution that grants social security benefits or in an independent entity. In some countries, social security collection mechanisms are integrated with those of tax collection, which can be advantageous as collection of social security contributions is centralized in treasury departments or finance ministries.

The establishment of a centralized model benefits both the institutions and the insured. It facilitates the process of detecting irregularities such as evasion and multiple registration and also helps control fraud. Moreover, it facilitates economies of scale by centralizing the management of both activities (enrolment and collection) to avoid expensive duplications, which are quite common in fragmented administrative models (Durán-Valverde, 2012). Control mechanisms applicable through a centralized model have additional advantages, including the ability of social security institutions to cross-check information, especially with ministries of finance. Another advantage is that they facilitate the application of fiscal incentives where they exist.

Facilitation for payment of contributions. A centralized collection system simplifies the management of social security resources. Social security institutions should also adopt strategies to reduce the costs of and facilitate the payment of contributions by

employers and workers. The analysis of international experiences in this study identified strategies that are common to countries with higher rates of coverage of the sector. The most common strategies are:

– The use of institutional web platforms or mobile applications to facilitate enrolment and payment of contributions (Uruguay);

– Agreements with commercial banks for payment of contributions in person or through institutional web platforms;

– Automatic debit services;

– Use of call centre services, processing of payments through bank account debits (Italy);

– Agreements with post offices or commercial entities, such as supermarkets or pharmacies, for payment of contributions at their locations; and

– Use of service vouchers.

Adequate definition of violations and penalties. It is essential that social security systems possess a solid legal framework that adequately defines violations and applicable fines in the case of employer non-compliance of contribution obligations by employers.

With respect to the process of registration, employers are often subject to deadlines, in days, for enrolling domestic workers in social security once the labour relationship is established. Deadlines vary significantly across countries. For example, in Cape Verde, the National Social Security Institute (INPS) establishes that employers should enroll domestic workers within 15 days of hiring whereas in the Philippines, the registration period is one month.

With respect to penalties, countries also vary in terms of the severity of penalties. Each country focuses on measures that it considers can favour compliance. Regardless of the severity of the penalties established by law, two types of penalties are generally applied in legislation for domestic work:

(a) Financial penalties, such as:

  (i) A penalty expressed in reference to minimum wages;

  (ii) Application of an interest rate on the default payment, calculated on the value of overdue contributions. In the Philippines, the law includes fines amounting to 3 per cent of the overdue amount;

  (iii) Application of a fine equivalent to a fraction or the entire amount of the overdue contributions. If it is a fraction, progressive increases are applied on the percentage as the number of months in default rises. In Argentina, for example, the fine is equivalent to between two and 10times the overdue amount.

(b) Criminal penalties. In Ecuador, employers are subject to jail time for evading their responsibility to insure for social security domestic workers. The jail sentence ranges from three to seven days. According to the Penal Code (Art. 244), the penalty is applicable 48 hours after receipt of the notification for payment of overdue contributions.

In most cases, social security schemes do not establish definitions and specific penalties for employers of domestic workers; rather, they apply the same penalties used for other workers.

Although some laws emphasize the classification and punishment of default practices, others focus more on preventing evasion. Both are important and the treatment of each should be considered separately in the legal definition.

Finally, the compulsory capacity of the social security contribution collection system established in legislation does not guarantee the success of a coverage policy. Nevertheless, it constitutes an indispensable foundation for improving the institutional structure with a view to extending coverage. To this end, the legal system and coercive capacity in general play a pivotal role in the operational capacity of social security institutions.

Service voucher-Service cheque. A challenge for the inclusion of the domestic work sector in social security is that a large share of domestic work is performed on a part-time or hourly basis, thus for multiple employers. Administrative and financial difficulties increase when the domestic worker has two or more employers. Enrolment and contribution collection procedures become more complex for both employers and workers because each employer must separately register the amount of time worked and pay the social security administration the appropriate proportion. For workers, the difficulty lies not only in convincing employers to comply with their obligation to enrol workers, but also to guarantee proper compliance. Frequently, neither employers nor workers are familiar with the administrative mechanisms. In most cases, mechanisms for registering hourly work do not exist, or are complicated, or legal coverage of social security does not apply to hourly domestic work. In terms of financing, social security schemes generally require payment of at least a minimum contribution by each employer increasing thus costs for employers, regardless of the time worked, thus creating a major barrier to the inclusion of domestic workers, which discourages employers from enrolling their workers.

An effective mechanism for addressing the difficulties inherent in the multi-employer modality is the service voucher. This is a system through which domestic work employers can purchase in tax offices vouchers (these may be voluntary or mandatory). These are used as a means to pay workers by the hour or workday. Workers receive the vouchers as a means of payment, which they can exchange for their equivalent monetary value. The responsible authority uses the service vouchers to remunerate the worker, as well as to credit the contributions for each employer and worker. Besides offering fiscal advantages, vouchers are a very effective way to reduce administrative and transaction costs of employers.

The service voucher offers several advantages. It facilitates the definition of workers' wages and the calculation of wage deductions, including social security contributions; it allows for the incorporation of fiscal incentives; and it provides a simple and practical legal and administrative solution. It is worth noting that, fiscal incentives are generally applied in the form of deductions or exemptions in the payment of some contributions.

Some of the countries that have implemented the modality of service cheque or service voucher for registering and paying domestic workers include Austria, Belgium, Canada (Quebec; Chèque Employment-Service), the Canton of Geneva in Switzerland (Chèque Service), France, Italy and the Netherlands. The case of the Canton of Geneva is noteworthy given that it includes undocumented migrant workers (EFFAT, 2015).

Box 3. Service voucher or service cheque for domestic workers, an effective mechanism in France and Belgium

France was the first country to issue the service voucher, in 1993, which was replaced in 2006 by the Universal Employment Service Voucher (Chèque emploi service universel (CESU)). Through the CESU, employers can pay both the services provided by the domestic worker and social security contributions. In principle, the activities included in the service voucher are associated with domestic work, however, the system also allows for the payment of services considered an extension of home services, such as payments to childcare institutions (in childcare centres).

In practice, to use the service voucher, the employer (the household) must register with the system through the Union de recouvrement des cotisations de sécurite sociale et d'allocations familiales (URSSAF) – French Social Security and Family benefit contribution Collection Union), entity responsible for collecting social contributions either through a bank or online. Once registered, employers are given the option of declaring their workers' wages through a coupon payment book or a website. Employers also authorize the National CESU centre (CNCESU) to automatically debit the contributions from their bank account. After registration is done, the CNCESU calculates worker and employer contributions and directly issues employment certificates, which is a proof of the insurance coverage of the worker. There are two types of declarations: "real amount," and "fixed amount." In the former case, contributions are calculated on the actual wage paid whereas with the fixed amount declaration, contributions are calculated based on a minimum hourly wage. Thus, using the CESU guarantees that remuneration cannot be less than either the minimum wage in effect in France (the minimum inter-professional growth wage) or the wage scales established in collective bargaining agreements.

With respect to fiscal advantages, the CESU grants employers the right to a tax reduction of 50 per cent for annual remunerations below a certain threshold (12,000 euros in 2014). Nevertheless, under some circumstances, this ceiling may be higher, for example when there are disabled individuals in the employing household. Additionally, the system exempts employers over age 70 from payroll taxes when they have a certified disability or when they are beneficiaries of other subsidies for personal or family reasons. With respect to the results of the system, in 2010, 78 per cent of employers were registered in the CESU.

In Belgium, the Federal Government promoted the service voucher, which entered into effect in 2004 under the name "Titres-services/Dienstencheque" (TS). The system was created to promote the employment of domestic workers. Results indicate that the system has contributed to the formalization of the sector.

The Belgian system differs from that of France in that the household is not the employer; instead, the household hires an accredited company that has employment contracts with domestic workers. Thus, the labour relationship is established based on three components: accredited firms, which are the employers; the household as final user; and the domestic worker, who is employed and paid by the accredited firm. As a consequence, the household receiving the service signs an agreement with the accredited firm (employer) to receive services from a domestic worker.

The Government of Belgium selected one firm (SODEXO), which is not the employer, to manage the service voucher system. Users (households) must register with that firm to purchase Service Vouchers in paper or online service vouchers. Workers receive service vouchers and send them to the firm that employs them, which sends a payment request to SODEXO.

In 2015, users paid 9 euros for a service voucher, whose cost was heavily subsidized by the government, mainly because SODEXO delivered 22.04 euros for each voucher to the accredited firms (employer). It is worth noting that users buying service vouchers benefit from fiscal advantages in two ways: firstly they have a 30 per cent discount on voucher purchases, as long as the annual deductible sum is less than 1,400 euros. Secondly, a nominal reduction of €0.9 on each voucher with the purchase of the first 150 vouchers. Households can purchase up to 500 vouchers. After this amount, the cost of each voucher increases. Users may not buy more than 1,000 vouchers annually, but there are exceptions, such as in the case of single-parent households, disabled individuals, parents of disabled children and older adults receiving social benefits.

In Belgium, employment contracts without service vouchers are illegal, which has enabled increased monitoring of the needs and quality of the sector. It has also led to greater professionalization of this activity. In 2011, the system had nearly 857,000 users (ILO, 2013c).

Source: EFSI (2013), ILO (2010a) and ILO (2013c).

Presumptive provision. To address the difficulties in guaranteeing social security coverage for domestic workers, some countries have implemented strategies to improve and facilitate their identification and registration.

One innovation for the inclusion of domestic workers in social security is the introduction of a presumptive provision based on the presumptive income of households. The institution administering social security presumes that a household is an employer of a domestic worker when the household income declared on tax statements is above a certain threshold. In this case, the administration notifies the respective household that it presumes that the household employs a domestic worker, thus it will charge the household the respective social security contributions. If the household is not the employer, the household head must demonstrate to the administration that he or she is not the employer through certain verification criteria such as monthly income. To implement this provision, the respective institution must have strong legal backing to send notifications and to make presumptive charges. Furthermore, close coordination between social security institutes and the tax authority is essential in order to obtain information on income declared by individuals and households.

In Argentina, the Federal Administration for Public Income (AFIP-Administración Federal de Ingresos Públicos) incorporated the presumptive scheme in 2013 (Law 26.844). The AFIP, which is responsible for enrolment and collection of taxes and social contributions, presumes that households with an annual income equal to or above 500,000 Argentine pesos (US$ 54,000 in September 2015) and that have assets worth more than 305,000 Argentine pesos (US$ 33,000 in September 2015) are employers of a domestic worker (General Resolution 3492/2013). The scheme authorizes AFIP tax inspectors to visit households that are presumed to have undeclared domestic workers.

II.2.5. Migrant domestic workers

Measures to guarantee coverage in the home country

Economic hardship forces many people to migrate to another country, usually a more developed one. An important proportion of these migrants end up in the domestic work sector.

Some countries have created mechanisms that facilitate social security coverage of migrant workers. The measures implemented include the possibility of voluntary registration in social security, online enrolment and payment of contributions, the portability of benefits and other incentives to encourage workers to register with social security administrations. These measures, together with bilateral and multi-lateral social security agreements, are indispensable not only for guaranteeing short-term social security benefits in the host country, but also for ensuring that workers do not lose accredited contributions to pension systems when they return to their home countries.

Legal coverage. Domestic workers' access to social security in the home country may be legally restricted by laws on territoriality of coverage, which limit the area of application of social security legislation to the territory of a country. As a result of this measure, in some countries, national domestic workers employed abroad are not covered by legislation, and thus they are denied access to benefits (Kulke, 2006; van Ginneken, 2010).

In this context, the extension of legal coverage to nationals (domestic workers) who work abroad is a highly effective measure that contributes to complementing long-term social pension benefits. Given that in many countries, migrant workers are subject to discriminatory practices, coverage in the home country is sometimes the only way for emigrating workers to access social protection. While mandatory coverage can pose a challenge for social security institutions, it is still the preferred scenario; however, voluntary coverage and in some cases differentiated coverage (restricted to some benefits) would facilitate access by national workers to benefits.

Portability of contributions or benefits. One issue of interest to migrant domestic workers is the portability of contributions or of benefits. This measure refers to the mechanism that enables migrant workers to maintain and to have recognized, in their home country, the contributions accumulated in the host country. Some agreements among countries permit migrant workers' to totalize contributions made in different countries. Portability is particularly important for guaranteeing long-term benefits such as from pension programmes.

In the absence of portability, migrants have little incentive to contribute because they can lose the contributions accumulated over the years abroad. They are faced with a high risk of financial loss.

Portability requires some type of cooperation between the social security institutions of the country of origin and host countries. This cooperation is generally established through bilateral or multi-lateral agreements. However, only a few countries have initiated bilateral social security agreements for migrant workers, and even fewer have established specific provisions to cover migrant domestic workers. To implement agreements (bilateral and multi-lateral), some practical concerns must first be addressed, the most important of which is the exchange of information between the social security institutions of the countries involved (Durán-Valverde, 2012).

Registration through embassies. Linkage with domestic workers abroad is a challenge for national institutions, especially in terms of communication, registration and payment of contributions. To address this problem, embassies in foreign countries can serve as links between the workers and social security institutions. This is the case of the Philippines, where domestic workers (Overseas Filipino Workers) may complete most of the necessary procedures in the embassies in the countries with the largest migratory flows.

Special programmes. The creation of special programmes to strengthen general schemes in an effort to cover domestic workers employed abroad appear to be an effective strategy. They permit the contribution and benefit provisions to be differentiated and adapted to a population with characteristics that are quite different from those of individuals covered in general schemes. In the Philippines, the Overseas Workers Welfare Administration (OWWA) provides services to migrant Filipino workers around the world, including domestic workers. The OWWA provides individual accident and life insurance policies, as well as short-term benefits for those who suffer occupational accidents, illnesses or disabilities during the time they are employed abroad. Through OWWA, enrolled workers also have access to health insurance through the Philippine Health Insurance Corporation (PhilHealth) (MPI, 2007).

Coverage in the host country

Legal coverage. In all contexts, it is essential for countries to apply the principle of equal treatment, according to which migrant domestic workers enjoy the same labour rights as nationals of the host country, including the right to social security. This study found that 86 per cent of countries that provide legal coverage for national domestic workers also do so for migrant domestic workers. Nevertheless, challenges remain in terms of the vertical dimension of coverage with respect to the number of social security branches included in coverage of migrant workers.

Linkage with public migration administrations. Social security institutions can contribute to creating mechanisms to promote the formalization of employment of migrant workers. Workers who want to enrol in social security could first register with the government agency that oversees migration issues in the host country, such as in the case of Singapore.

Training of domestic workers. Working in a foreign country is a challenge for anyone, and even more so for unskilled workers. Some countries offer training courses for domestic workers prior to authorizing work permits. The courses provide information on rights and responsibilities of the worker, including those associated with social security, among other subjects.

In any case, the professionalization of domestic work for migrant or national domestic workers is an effective mechanism for strengthening bargaining power within employment relationships.

II.2.6. Comparative summary of international practices

It is useful to identify and to systematize international practices to support a comparative assessment of public policy measures in different contexts. Table 6 lists the main strategies implemented in a group of 15 countries. These countries are Germany, Argentina, Cabo Verde, Costa Rica, Ecuador, Spain, France, Israel, Italy, Malaysia, Mauritius, the Philippines, Singapore, Turkey and Uruguay.

Strategies are divided into four groups: (1) aspects of institutional organization; (2) financial aspects; (3) practices for registration and promotion of coverage; and (4) collection of contributions. In summary, the elements common to the different national strategies are identified. However, it is important to mention that the specific strategies selected and their relative success will depend on the national context where they are applied.

Table 6. Summary of international practices associated with social security schemes for domestic workers (selected countries)

Practices	Argentina	Cabo Verde	Costa Rica	Ecuador	France	Germany	Israel	Italy	Malaysia	Mauritius	Philippines	Singapore	Spain	Turkey	Uruguay
Aspects of institutional organization															
General scheme	✓	✓	✓	✓	✓		✓	✓		✓	✓		✓	✓	✓
Specific legislation for domestic workers	✓				✓	✓		✓			✓		✓		✓
Financing aspects															
Differentiated contribution rates (reduced)	✓	✓	✓		✓	✓	✓	✓			✓		✓		✓
Contribution based on reference wages		✓				✓		✓	✓	✓	✓		✓		
Government subsidies			✓											✓	
Fiscal incentives for employers	✓			✓	✓	✓		✓	✓			✓	✓		
Contribution rate based on hourly wage	✓				✓			✓							
Contribution rate based on worker's age	✓						✓		✓			✓			
Contribution rate based on household composition															✓
Contributions in nominal amounts	✓							✓		✓			✓		
Practices regarding registration and promotion of coverage															
Single and centralized system for registration	✓	✓		✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓
Access to loans			✓						✓		✓	✓			
Multi-employer provision	✓			✓	✓	✓	✓	✓				✓	✓		✓
Provision to include hourly work	✓			✓	✓	✓	✓	✓				✓	✓		✓
E-services through web platform	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓		✓
Collection of contributions															
Single and centralized collection system	✓	✓		✓	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓
Use of service vouchers					✓	✓		✓							
Online service to pay contributions	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Use of presumptive income mechanisms	✓														

Part III. Conclusions

The information and analysis presented in this report demonstrate that an increasing number of countries are extending the coverage of their social security systems to protect domestic workers. Of the 163 countries in this study, 70 have incorporated legal provisions to provide social protection to domestic workers. Despite the progress observed worldwide, a considerable deficit exists in terms of effective coverage.

The largest deficits in social security coverage of domestic workers are concentrated in developing countries – mainly in Africa and Asia –, where only a few countries provide legal coverage to the domestic work sector. Moreover, developing regions have the largest number of domestic workers worldwide, particularly Asia and Latin America. Inadequate coverage also affects developed countries, however, especially those where migrant domestic workers have a significant presence.

There is no single model for social security for domestic workers. Most countries in practice opt for social protection of the sector through general social insurance schemes, providing legal guarantees for the same coverage conditions as those established for the other workers, or with some minor variations. Mandatory legal coverage is the most frequent practice worldwide, which appears to contribute significantly to higher levels of effective coverage. While domestic work is protected through general social security schemes, in many cases national schemes often establish different conditions for domestic workers, although they are not necessarily more favourable than those applied to other employees. These conditions include: fewer social security branches subject to legal coverage; lower levels or amounts of benefits; increased contributory effort in relative terms; and more requirements for access, among others. Although a large number of countries provide social security for domestic workers, not all of them offer the same vertical dimension of coverage or access conditions as those that apply to other employees.

Due to their atypical employment conditions, domestic workers are considered a difficult-to-cover group by social security administrations. This study identified major roadblocks of different types, which together contribute to the extremely high deficit in effective coverage worldwide, even in developed countries.

The main barriers to extending social security coverage to domestic workers are related to factors such as among others: legal exclusion; voluntary rather than mandatory coverage; the lack of provisions or strategies to enrol workers with more than one employer (multi-employer) or that work part-time; the narrow definition of domestic work in legislation; limitations on legally protected contingencies; the lack of incentives for contributions, including the absence of contributory conditions adapted to the low contributory capacity existing in the sector; the complexity or inadequacy of administrative procedures for enrolment and collection of contributions; the lack of information on rights and responsibilities; and the low level of organization among workers.

The limited contributory capacity for participating in social security systems is without a doubt a problem affecting a large number of employers of domestic workers, as well as the majority of domestic workers. Overcoming barriers associated with affordability is therefore a key challenge. The situation is even more difficult when employers are themselves in a vulnerable situation, such as in the case of the elderly or the disabled. To address this issue, the government has a key role to play, whether it is by subsidizing the financing of social security for the sector, by establishing a minimum wage high enough to guarantee a minimum contributory capacity, or by limiting in-kind payments. Challenges for financing are even greater in the case of part-time or hourly domestic work.

Notwithstanding existing barriers, this study found that it is feasible to extend legal and effective social security coverage to the domestic work sector, even in developing countries. Countries that have made important strides in extending effective coverage developed a combination of strategies and interventions. These include good practices in adapting the legal framework, institutional organization, financing, enrolment and promotion of coverage, information dissemination and awareness-raising, and collection of contributions, as well as specific measures to include migrant domestic workers. The good practices identified in this study involve a variety of strategies.

In an effort to maximize social security coverage of the sector and fulfil the objectives of protection, social security systems should fulfil certain criteria and implement good governance practices. Social security systems for domestic workers should be:

(a) **Inclusive.** They should guarantee the inclusion of participants in the sector through a broad legal definition of domestic work and avoid restrictions on legally protected contingencies. Coverage should be mandatory and in conditions comparable to those of other employees, if not more advantageous.

(b) **Affordable.** Systems should be within the financial reach of domestic workers and their employers. Social security systems should establish financing conditions adapted to the low contributory capacity typical of the domestic work sector, including provisions or strategies that enable the enrolment of individuals who work part-time for one or more employers (multi-employer). Additionally, countries should consider introducing contributory incentives, including fiscal incentives.

(c) **Simple.** The administrative procedures that domestic workers and their employers are required to carry out should be as simple as possible. The parties involved should be adequately informed on their rights and responsibilities and how to exercise them. Guaranteeing the ease of procedures for enrolment and payment of contributions is crucial.

(d) **Guarantee compliance.** Labour and social security administrations should work together in coordination to guarantee compliance with social security law for domestic workers. Specifically, labour inspections should be strengthened and adapted to the atypical characteristics of the sector. Violations should be clearly defined and penalized.

(e) **Attractive.** Social security systems for domestic workers should be capable of attracting the largest number of potential participants possible, both employers and workers. To this end, countries should make institutional efforts to promote the advantages of social security enrolment, as well as to raise awareness of employers and workers with respect to the associated benefits. Systems should also be attractive in terms of financing. To this end, systems can offer fiscal incentives for employers of domestic workers.

Besides the economic and institutional barriers associated with coverage of the domestic work sector, psychological and cultural obstacles still exist that impede domestic workers from exercising their right to social security. The experiences examined in this study demonstrate that the political will to move forward in extending coverage is a crucial factor. Many countries have made significant efforts in this area, with positive and even surprising results. Other countries can learn from these experiences and adapt them to their national context.

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Annex

Table A.1. List of countries included in the report (163 countries)

Africa

Algeria
Angola
Benin
Botswana
Burundi
Cabo Verde
Cameroon
Central African Republic
Chad
Comoros
Congo, the Democratic Republic of the
Côte d'Ivoire
Djibouti
Equatorial Guinea
Eritrea
Ethiopia
Gabon
Gambia
Ghana
Guinea-Bissau
Kenya
Lesotho
Liberia
Malawi
Mali
Mauritania
Mauritius
Morocco
Mozambique
Namibia
Niger
Nigeria
Rwanda
Sao Tome and Principe
Senegal
Seychelles
Sierra Leone
Somalia
South Africa
South Sudan
Sudan
Swaziland
Tanzania, United Republic of
Togo
Tunisia
Uganda
Zambia
Zimbabwe

Asia and the Pacific

Afghanistan
Armenia
Azerbaijan
Bangladesh
Brunei Darussalam
China
China (Hong Kong)
Fiji
Georgia
India
Indonesia
Iran, Islamic Republic of
Kazakhstan
Kiribati
Korea, Republic of
Kyrgyzstan
Lao People's Democratic Republic
Malaysia
Maldives
Marshall Islands
Mongolia
Myanmar
Nepal
New Zealand
Pakistan
Palau
Papua New Guinea
Philippines
Samoa
Singapore
Solomon Islands
Sri Lanka
Tajikistan
Thailand
Timor-Leste
Turkmenistan
Tuvalu
Uzbekistan
Vanuatu
Vietnam

Central and Eastern Europe

Bulgaria
Czech Republic
Hungary
Latvia
Lithuania
Poland
Romania
Russian Federation

Latin America and the Caribbean

Antigua and Barbuda
Argentina
Bahamas
Barbados
Belize
Bolivia, Plurinational State of
Brazil
Chile
Colombia
Costa Rica
Cuba
Dominica
Dominican Republic
Ecuador
El Salvador
Grenada
Guatemala
Guyana
Haiti
Honduras
Mexico
Nicaragua
Panama
Paraguay
Peru
Saint Kitts and Nevis
Saint Lucia
Saint Vincent and the Grenadines
Suriname
Uruguay
Venezuela, Bolivarian Republic of

Middle East

Bahrain
Cyprus
Egypt
Iraq
Israel
Jordan
Kuwait
Lebanon
Oman
Qatar
Saudi Arabia
Turkey
United Arab Emirates
Yemen

North America

Canada
United States

Europe

Austria
Belgium
Denmark
Finland
France
Germany
Greece
Iceland
Ireland
Italy
Luxembourg
Malta
Netherlands
Norway
Portugal
San Marino
Spain
Sweden
Switzerland (Canton of Geneva)
United Kingdom

Table A.2. Contingencies covered by national social security systems for domestic workers

Country	Type of scheme (general or special)	Type of coverage (Mandatory or voluntary)	Type of benefits covered for domestic workers						
			Medical care	Pensions (old-age, invalidity and survivors)	Sickness benefit	Unemployment benefit	Employment injury benefit	Family benefit	Maternity benefit
Algeria	Special	Mandatory	●	●	○	○	○	○	○
Argentina	General	Mandatory	●	●	●	○	●	●	●
Austria	General	Mandatory	●	●	●	●	●	●	●
Belgium	General	Mandatory	●	●	●	●	●	●	●
Bolivia	General	Mandatory	●	○	○	○	○	○	○
Brazil	General	Mandatory	●	●	●	●	●	○	●
Bulgaria	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Cabo Verde	General	Mandatory	●	●	●	○	●	●	●
Canada	General	Mandatory	●	●	●	●	●	●	●
Chile	General	Mandatory	●	●	●	●	●	○	●
China (Hong Kong)	Special	Mandatory	●	○	○	○	●	○	○
Colombia	General	Mandatory	●	●	●	○	●	○	●
Costa Rica	General	Mandatory	●	●	●	●	●	○	●
Cuba	General	Mandatory	●	NS	NS	NS	NS	NS	NS
Czech Republic	General	Mandatory	●	NS	NS	NS	NS	NS	NS
Denmark	General	Mandatory	●	●	●	●	●	●	●
Ecuador	General	Mandatory	●	●	●	○	●	○	●
Egypt	Special	Mandatory	○	●	○	○	○	○	○
El Salvador	Special	Voluntary	●	○	○	○	○	○	●
Fiji	General	Voluntary	●	●	○	○	○	●	○
Finland	General	Mandatory	●	●	●	●	●	●	●
France	General	Mandatory	●	●	●	●	●	●	●
Gabon	General	Mandatory	○	●	○	○	○	○	○
Germany	Special	Mandatory	●	●	●	●	●	●	●
Greece	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Guatemala	General	Mandatory	●	●	NS	NS	NS	○	●

Country	Type of scheme (general or special)	Type of coverage (Mandatory or voluntary)	Type of benefits covered for domestic workers						
			Medical care	Pensions (old-age, invalidity and survivors)	Sickness benefit	Unemployment benefit	Employment injury benefit	Family benefit	Maternity benefit
Guatemala	Special	Voluntary	NS	NS	NS	NS	NS	NS	NS
Honduras	Special	Voluntary	●	○	○	○	○	○	○
Hungary	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Iceland	General	Voluntary	NS	NS	NS	NS	NS	NS	NS
Indonesia	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Ireland	General	Mandatory	●	●	●	●	○	●	●
Israel	General	Mandatory	●	●	●	●	●	●	●
Italy	General	Mandatory	●	●	●	●	●	●	●
Kenya	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Korea, Republic of	General	Voluntary	○	○	○	●	●	○	○
Latvia	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Lithuania	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Luxembourg	General	Mandatory	●	●	●	●	●	●	●
Malaysia	General	Voluntary	○	●	○	○	○	○	○
Mali	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Mauritania	General	Mandatory	○	●	○	○	●	○	○
Mauritius	General	Mandatory	○	●	○	○	●	○	○
Mexico	Special	Voluntary	●	●	●	●	○	○	●
Netherlands	General	Mandatory	●	●	●	●	●	●	●
New Zealand	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Nicaragua	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Norway	General	Mandatory	●	●	●	●	●	●	●
Panama	General	Mandatory	●	●	●	○	○	○	●
Paraguay	Special	Mandatory	●	○	●	○	●	○	●
Peru	General	Mandatory	●	●	●	○	○	○	●
Philippines	General	Mandatory	●	●	●	○	●	○	●
Poland	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Portugal	General	Mandatory	●	●	●	●	●	●	●

Country	Type of scheme (general or special)	Type of coverage (Mandatory or voluntary)	Type of benefits covered for domestic workers						
			Medical care	Pensions (old-age, invalidity and survivors)	Sickness benefit	Unemployment benefit	Employment injury benefit	Family benefit	Maternity benefit
Romania	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Russian Federation	General	Mandatory	●	●	●	●	●	○	●
Senegal	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Singapore	General	Mandatory	●	●	●	○	○	○	●
South Africa	General	Mandatory	○	○	●	●	○	○	●
Spain	General	Mandatory	●	●	●	○	●	●	●
Sweden	General	Mandatory	●	●	●	●	●	●	●
Switzerland (Canton of Geneva)	General	Mandatory	●	●	●	●	●	●	●
Togo	General	Mandatory	NS	NS	NS	NS	NS	NS	NS
Tunisia	Special	Mandatory	●	●	○	○	●	○	○
Turkey	General	Mandatory	●	●	●	●	●	○	●
United Kingdom	General	Mandatory	●	●	●	●	●	●	●
United States	Special	Mandatory	●	●	○	○	●	○	○
Uruguay	General	Mandatory	●	●	●	●	●	●	●
Viet Nam	General	Mandatory	●	●	●	○	●	○	●
Zambia	General	Mandatory	NS	●	●	○	●	○	●

Sources:

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– Laws and regulations contained in Table A.3 are part of the information sources.

Notes:

● With coverage for domestic workers; ○ No coverage for domestic workers; NS: Not specified.

Table A.3. Legal aspects related to social security for domestic work

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
Algeria	– Act No. 83-11 concerning social insurance – Decree No. 85-33 of 9 February 1985 – Act No. 83-14 of 2 July 1983 on obligations of reporting on social security – Decree No. 85-34 of 9 February 1985 establishing the social security contributions for specific categories of insured, p. 146	"In particular domestic servants, porters, drivers, housekeepers, seamstresses and nurses, as well as persons performing regularly or occasionally, their administration or association control which they are subject." (Decree No. 85-33 of 9 February 1985 establishing the list of workers treated as employees for social security)	Yes	Yes	Yes	Yes	No	Yes	NS
Argentina	– Decree on the regime of work of domestic workers (Act No. 326 of 20 January 1956) – Decree on the regime of work of domestic workers (No. 326/956) – Law of the Special Regime of Social Security for domestic servants 1999 (No. 25.239) – Special Law of contract work for domestic workers (No. 26.844)	NS	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.
Austria	– The Federal Act on Domestic Help and Servants – The Home Care Act – The Household Service Cheque Act – Different minimum wage regulations for domestic workers exist at a state level	NS	NS	NS	NS	NS	NS	NS	Explicitly included in standards governing working conditions.
Belgium	– Decree on Social Security (1969) – Royal Decree of 13 July 2014	NS	NS	NS	NS	NS	NS	NS	Explicitly included in standards governing working conditions.
Bolivia	– Law No. 2450 (Law regulating	"Trabajo asalariado del hogar es aquel	Yes	Yes	Yes	No	No	No	Explicitly included in

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
	salaried domestic work)	que se presta en forma continua, a un empleador o familia que habita bajo el mismo techo. Están considerados en este sector, los trabajadores que realizan trabajos de cocina, limpieza, lavandería, aseo, cuidado de niños, asistencia y otros que se encuentren comprendidos en la definición, y sean inherentes al servicio del hogar. No se considera trabajo asalariado del hogar, el desempeñado en locales de servicio y comercio, aunque se realicen en casas particulares." (Art. 1, Law No. 2450)							standards governing working conditions.
Brazil	– Constitution of the Federative Republic of Brazil in 1988 – Act No. 5859 of concerning the occupation of domestic workers – Directive No. 23 of the National Social Security Institute (31 May 2000) – Resolution No. 253 establishing procedures for granting unemployment insurance to domestic workers – Ministerial Directive No. 77 establishing social security contribution quotas for domestic employees – Decree Law No. 71.885	Domestic worker is "who delivers continuous service through monthly compensation, the person or family in non-profit activity." (Art. 1, Law No. 5859/72)	NS	NS	NS	NS	NS	NS	Excluded from standards governing working conditions.
Bulgaria	NS	NS	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
Cabo Verde	– Decree Law No 62/1986 (General Legal Regime of Work Relations) – Decree Law No. 5/2004 (Regulations for the scheme for salaried workers) – Labour Code of Cabo Verde (5/2007) – Decree Law 43/2009 – Decree Law 49/2009. Professional in domestic work in General Social Worker Protection for another person	"It is considered domestic work what is provided in the employer's residence to meet the personal needs and permanently bind with the life of this and his household." (Art. 286, Labour Code of Cabo Verde (5/2007))	Yes	Yes	Yes	Yes	Yes	No	Explicitly included in standards governing working conditions.
Canada	– The Labour Standards Act – Employment Insurance Act – Old Age Security Act, Revised Statutes of Canada	Art. 1 (...) 6: "Domestic" means an employee employed by a natural person and whose main function is the performance of domestic duties in the dwelling of that person, including an employee whose main function is to assume custody or care of a child or to a sick, handicapped person or an elderly person and perform in the housing of domestic duties that are not directly related to the immediate needs of the detainee. Law On The Standards Of The Work.	Yes	Yes	Yes	No	No	No	Domestic work is not regulated at the federal level.
Chile	– Law No. 19.591 (1998) – Law No. 16.744 – Law No. 20.255/2008 – Law No. 19.010 – Decree 3500/80 – Código de Trabajo	"Workers at a private house are natural persons engaged continuously, full or part time, serving one or more individuals or a family, work or inherent cleanliness and home care (...)" (Art. 146, Labour Code).	Yes	Yes	NS	NS	NS	NS	Explicitly included in standards governing working conditions.
China (Hong Kong)	– Employees' Compensation Ordinance Contract Act and the General Principles of the Civil Act	NS	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
Colombia	– Law 11 (1988) – Law 1429 (2010) – Law 1450 (2011) – Law 797 (2003) – Resolution 01677 (2008) – Decree 824 of 1988	"(...) The natural person who pays remuneration his personal services directly, as usual, under continuous subordination or dependence, residing or not in the workplace, to one or more natural persons performing tasks in toilet, cooking, washing, ironing, child surveillance and other tasks inherent to home." (Decree 824, 1988)	Yes	Yes	Yes	No	No	No	Some sections of the Substantive Labour Code apply explicitly to domestic workers.
Costa Rica	– Labour Code and reforms (original text: 1943) (Law 2) – Constitutive Law of the Costa Rican Social Insurance Fund (1943) (Law 17) – Code of Children and Adolescents (1998) (Law 7.739) – Worker's Protection Law (2001) (Law 7.983) – General Law of Immigration and Foreigners (2009). (Law 8.764) – Regulation of health insurance (CCSS)	"Domestic workers are the people who provide care and comfort to a family or person, for remuneration; They engage in regular and systematic manner, cleaning, cooking, washing, ironing and other own work from home, residence or private room, they do not generate profit for employing people; they can also assume tasks related to the care of people when so agreed between the parties and these are developed in the house of the person served." (Art. 101, Labour Code, and reforms (Law No. 8726))	Yes	Yes	Yes	No	No	No	Explicitly included in standards governing working conditions.
Cuba	NS	NS	NS	NS	NS	NS	NS	NS	NS
Czech Republic	NS	NS	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.
Denmark	– Act on Certain Employment Relationships in Agriculture, etc. (AERA) – Unemployment Insurance Act of 2 May – Act No. 975 of 26 September, on unemployment insurance	NS	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
Ecuador	– Labour Code. 1997 – Childhood and Adolescent Code, Law No.2002-100 – Social Security Act, Ley No. 2001-55	"Domestic worker is presented, upon payment, to a person who does not pursue for profit and only intends to take advantage of the continuous service of the employee, for itself or your family, whether domestic purposes is also employer at home or away." (Labour Code, Art. 262)	NS	NS	NS	NS	NS	NS	NS
Egypt	– Social Insurance and new Pensions, Law No. 135 for 2010 – Law No. 112/1980. Workers in the Casual Employment Sector – Social Security Act for employers (1976)	Definition is not clear in the legislation.	NS	NS	NS	NS	NS	NS	Excluded from standards governing working conditions.
El Salvador	– Ley del Seguro Social – Código de Trabajo de El Salvador	"Domestic workers, people who engage in regular and ongoing basis to own housework or other place of residence or private room, it do not matter profit or business for the employer." (Art. 77, Código de Trabajo)	NS	NS	NS	NS	NS	NS	Explicitly included in standards governing working conditions.
Fiji	– Laws of Fiji, Chapter 92, Employment ordinance – Fiji National Provident Fund Act, Chapter. 219 – Fiji National Provident Fund, Decree No. 52	"'Domestic servant' means a person employed in connexion with the work of a private dwelling-house and not in connexion with any trade, business or profession carried on by the employer in such dwelling-house and includes a cook, house servant, child's nurse, gardener, washerwoman, watchman and driver of any vehicle licensed for private use." (Art. 2, Laws of Fiji, Chapter 92, Employment ordinance)	Yes	Yes	Yes	Yes	Yes	Yes	NS
Finland	– Act on the Employment of Household Workers (1951) – Employment Contracts Act	"Workers who carry out household work at the employer's home on the basis of an employment contract." (Art. 1, Act No. 951/1977)	NS	NS	NS	NS	NS	NS	Explicitly included in standards governing working conditions.

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
France	– Code du travail, article 772-1 – Code de la sécurité sociale – Convention collective nationale de travail du personnel employé de maison en vigueur le 27 juin 1982	NS	NS	NS	NS	NS	NS	NS	Explicitly included in standards governing working conditions.
Gabon	– Social Security Code (Act No. 6/75). – Labor Code, Law No. 3/94 – Ordinance No. 1a / 76 of 6 January 1976 on the extension of the law of social security	NS	NS	NS	NS	NS	NS	NS	Excluded from standards governing working conditions.
Germany	– Sozialgesetzbuch (Social Code).	NS	NS	NS	NS	NS	NS	NS	Explicitly included in standards governing working conditions.
Greece	NS	NS	NS	NS	NS	NS	NS	NS	NS
Guatemala	NS	NS	NS	NS	NS	NS	NS	NS	NS
Honduras	– Social Security Act and Decree No. 080-2001 – Regulation of the Special Regime and Progressive affiliation, Law No. 31681 – Labour Code, as amended, Decree No. 189, 1959	"Domestic work is presented through compensation to a person who does not pursue for profit and only intends to build, in his place, the continuous service of the employee for its own or his family, whether domestic purposes is also home of the employer or away. As the defendant was not foreseen in the contract, it will be the custom." (Art. 149, Labour Code and its reforms, 1959, Honduras)	Yes	Yes	Yes	No	No	Yes	Explicitly included in standards governing working conditions.
Hungary	NS	NS	NS	NS	NS	NS	NS	NS	NS
Iceland	NS	NS	NS	NS	NS	NS	NS	NS	NS
Indonesia	NS	NS	NS	NS	NS	NS	NS	NS	NS

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
Ireland	– Code of Practice for Protecting Persons Employed in Other People's Homes (2007) – Code of Practice for Determining Employment or Self-Employment Status of Individuals – The Social Welfare and Pensions Act – Social Welfare Consolidation Act	"'Domestic worker' means a person who is employed in the home of another person". (Code of Practice for Protecting Persons Employed in Other People's Homes (2007))	NS	NS	NS	NS	NS	NS	Explicitly included in standards governing working conditions.
Israel	– State Health Insurance Law – National Insurance Law	NS	NS	NS	NS	NS	NS	NS	NS
Italy	– Il Codice Civile Italiano (1942) – Act No. 339/1958. On the protection of domestic work – Law No. 977 (1967). Protection of Labour of Children and Adolescents – Law No. 388/2000 – Presidential Decree No. 1403/1971. On regulating the obligation to provide social insurance for domestic workers, including workers in charge of "clearing up" and cleaning premise – Legislative Decree No. 151 (2001). Consolidated maternity/paternity – Law of 28 January 2009	"Domestic workers are those who provide ongoing employment for the needs of the family life of the employer, such as household workers, caregivers or babysitters, housekeepers, waiters, cooks, etc."	Yes	Yes	Yes	No	No	No	Explicitly included in standards governing working conditions.
Kenya	– The Domestic Employment Registration (Repeal) Act (No. 55 of 1958 (amended)) – The Regulation of Wages (Domestic Servants) Order 1967 (LN No. 254 of 1967) – The Regulation of Wages (Domestic Servants Council Establishment) Order 1967 (KN No. 106 of 1967) (amended by regulations wages of 2007)	NS	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
Korea, Republic of	– Labor Standards Act (Law No. 5309)	NS	NS	NS	NS	NS	NS	NS	NS
Latvia	NS	NS	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.
Lithuania	NS	NS	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.
Luxembourg	– Code of Social Security	NS	NS	NS	NS	NS	NS	NS	Explicitly included in standards governing working conditions.
Malaysia	– Workmen´s Compensation Act 273 – Employees provident fund. Act 452 – Employment Act	"'Domestic servant' means a person employed exclusively in the work or in connection with work of a private dwelling house and not of any trade, business or profession carried on by the employer in such dwelling house and includes a cook, house servant (including bedroom and kitchen servants), waiter, butler, child's or baby's nurse, valet, footman, gardener, washerman or washerwoman, watchman, groom and driver or cleaner of any vehicle licensed for private use." (Employment Act, 1955, Art. 2).	Yes	Yes	Yes	Yes	Yes	Yes	Explicitly included in standards governing working conditions.
Mali	– Decree No. 96-178/P-RM of 13 June 1996; Decree of the Labour Code with Part determining the terms and conditions of employment and remuneration of domestic workers – Employment conditions of domestic workers	NS	NS	NS	NS	NS	NS	NS	Explicitly included in standards governing working conditions.
Mauritania	– Act No. 67-039 establishing a social security system	NS	NS	NS	NS	NS	NS	NS	NS

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
Mauritius	– Labour Act RL 3/315-30 December 1975 – National Pensions Act, Act No. 44 of 1976 – Employment Rights Act 2008 & Regulation – Employment Relations Act 2008 & Regulations – Child Labor and Minimum Age for Employment	"'domestic service' means employment in a private household and includes employment as cook, driver, gardener, garde malade (…)" (Mauritius – National Pensions Act 1976 (Act No. 44 of 1976)	Yes	Yes	Yes	Yes	No	Yes	NS
Mexico	– Federal Labour Law – Social Security Act (1973) – Regulation on the voluntary affiliation of domestic workers in the compulsory social security scheme	"Domestic workers are providing sanitation services, and other assistance or inherent to the home of a person or family." (Special workers, Federal Labor Law)	Yes	Yes	Yes	No	No	No	Explicitly included in standards governing working conditions.
Netherlands	– Regulation on domestic work (Regeling dienstverlening aan huis) – Regulation on employment in domestic services (Regeling Schoonmaakdiensten Particulieren) – Regulation on exempt domestic workers (Regeling vrijgesteld huispersoneel) – The House Service Regulation specifically excludes domestic workers from social security	NE	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.
New Zealand	NE	NE	NS	NS	NS	NS	NS	NS	NS
Nicaragua	– Regulations implementing the Social Security Domestic Workers. Regulation No. 202 of 2 November 1978	NE	NS	NS	NS	NS	NS	NS	NS
Norway	– National Insurance Act	NE	NS	NS	NS	NS	NS	NS	NS

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
Panama	– Law of Social Security, Act 51	"Domestic workers are providing, on a regular and continuous basis, toilets, assistance or other household own a person or family members." (Art. 230. Labour Code)	Yes	Yes	NS	NS	NS	NS	Explicitly included in standards governing working conditions.
Paraguay	– Labour Code – Regime unified pension and modifies the provisions of Legislative Decree No. 18660	"Domestic workers are those who work on a regular basis at work grooming, assistance and other services of the interior of a house or other place of residence or private room." (Labour Code, Art.148)	Yes	Yes	Yes	Yes	No	Yes	Explicitly included in standards governing working conditions.
Peru	– Law on domestic workers, Law No. 27986 – Supreme Decree No. 015-2003. Regulation of the Law on Domestic Workers	"Service workers are those who perform household chores like cleaning, cooking, washing, care, child care and other conservation own a home or home-room and the development of the life of a home, who do not mind making or business for the employer or their relatives." (Art. 2, Law No. 27986)	Yes	Yes	Yes	No	No	No	Implicitly included in standards governing working conditions.
Philippines	– Presidential Decree No. 1530 (Home Development Mutual Fund) (1978) – Labor Code of the Philippines, Presidential – Decree No. 442, as amended (original text: 1974) – Social Security Law. Republic Act No. 8282 (1997). – Republic Act 9231 or the Anti-Child Labor Act (2003) – Domestic Workers Convention. C189 (2011), 5 September 2012 (in force) – Domestic Workers Act or Batas Kasambahay, Law No. 10361 (2012)	"Domestic or household service" shall mean service in the employer's home which is usually necessary or desirable for the maintenance and enjoyment thereof and includes ministering to the personal comfort and convenience of the members of the employer's household, including services of family drivers. (Labor Code of the Philippines, Art. 141) Domestic worker or "Kasambahay" refers to any person engaged in domestic work within an employment relationship such as, but not limited to, the following: general househelp, nursemaid or "yaya", cook, gardener, or laundry person, but shall exclude any person who performs domestic work	Yes	Yes	Yes	Yes	No	Yes	Explicitly included in standards governing working conditions.

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
		only occasionally or sporadically and not on an occupational basis. (Art. 4, Republic Act No. 10361)							
Poland	NE	NE	NS	NS	NS	NS	NS	NS	NS
Portugal	– Decreto No. 50/2012 (Procede à segunda No. 50/2012 (proceeds to the second amendment to Decree No. 1-A/3 January 2011, which regulates the Code of Contributory schemes of the Social Security System) – Decree No. 1-A/2011 (Code of Regulations of the Social Security Contribution Regimes of Social Security System) – Law No. 100/97 and Decree-Law No. 143/99 – Law No. 235/92	"Domestic worker who pays regularly to another, under their direction and authority, activities designed to satisfy a household (cooking, washing clothes, cleaning the house, caring for children or the elderly, treating the garden or animals do sewing services, etc), receiving a remuneration on a regular basis." (Definition according to Social Security Institute)	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.
Romania	NE	NE	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.
Russian Federation	– Law No. 212-FZ – Law No. 167 (On compulsory pension insurance) – Law No. 255-FZ (On compulsory social insurance in case of temporary disability and maternity) – Law No. 326-FZ (On compulsory medical insurance) – Law No. 125-FZ (On compulsory social insurance against industrial accidents and occupational diseases) – Law No. 255–FZ Labor Code	NE	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
Senegal	– Interprofessional national collective agreement Senegal, from 27 May 1982	NE	NS	NS	NS	NS	NS	NS	NS
Singapore	– Central Provident Fund Act (1953) – Employment of Foreign Manpower Act (1990) – Workplace Safety and Health Act (2006) – Employment Agencies Act (1958) – Work Injury Compensation Act (2008)	"'domestic employee' means an employee employed by a person exclusively in the work or in connection with the work of that person's private domestic household and not of any trade, business or profession carried on by the employer in that household, and includes a cook, house servant (including bedroom and kitchen servants), waiter, butler, child's or baby's nurse, valet, watchman, gardener, groom and driver or cleaner of any vehicle licensed for private use." (Central Provident Fund Act) Other definition: "'domestic worker' means any house, stable or garden servant or motor car driver, employed in or in connection with the domestic services of any private premises." (Art. 2, Employment Act)	Yes	Yes	Yes	Yes	No	Yes	NE
South Africa	– No. 9 of 2004: South African Social Security Agency Act, 2004 – Unemployment Insurance Contributions Act, 2002	"A domestic worker is a gardener, driver or person who looks after children, the aged, sick, frail or disabled in a private household, but not on a farm." (Art. 1, Unemployment Insurance Contributions Act, 2002)	Yes	Yes	Yes	Yes	No	Yes	Explicitly included in standards governing working conditions.
Spain	– Royal Decree – Law 29/2012: Performance management and social protection in the Especial Systems for Housekeepers and other measures in the economic and social fields	Real Decreto 1620/2011, Art. 1: "These are the services or activities provided to the family home, which may take any of the forms of household chores and the care of the home address or a whole or some of its parts, care or attention of the members of the family or people who are	Yes	Yes	Yes	Yes	Yes	Yes	Explicitly included in standards governing working conditions.

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
	– Royal Decree No. 1620/2011: It regulates the labor relation as Especial nature of the house-family services – Royal Decree No. 1415/2004: General Regulation for the Collection of the Social Security – Royal Legislative Decree No. 1/1995: Workers´ Bylaw – Royal Legislative Decree No. 1/1994: General Law of the Social Security	part of the household or family, and other works performed as part of the whole household, such as childcare, gardening, driving vehicles and other similar tasks."							
Sweden	NE	NE	NS	NS	NS	NS	NS	NS	NS
Switzerland (Canton of Geneva)	– Loi sur la prévoyance professionnelle (LPP – 2° pilier) – Standard contract of the Canton of Geneva for full-time and part-time domestic workers is used as a reference in this document	NE	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.
Togo	NE	NE	NS	NS	NS	NS	NS	NS	NS
Tunisia	– Law No. 96-101, on workers' social protection – Law No. 2002-32 (low-income workers) – Law No. 2002-916	NE	NS	NS	NS	NS	NS	NS	Excluded from standards governing working conditions.
Turkey	– Labour Law No. 4857, the Law of Obligations No. 6098, Law on Social Security and General Health Insurance No. 5510 and the Law No.6356 on Trade Unions and Collective Agreements	In Turkey, the terms "domestic services" and "domestic service" providers are used in place of "domestic work" and "domestic workers", Article 4(e) of the Labour Law No. 4857 excludes "domestic services" from the scope of this legislation. The law does not define domestic services and thus domestic service providers that it excludes.	NS	NS	NS	NS	NS	NS	Excluded from standards governing working conditions.

Country	Laws or regulations relating to social protection for domestic work	Definition of domestic work (if existing)	Activities covered by social security						Standards governing working conditions [1]
			Cooking	Cleaning	Care	Gardening	Security	Family chauffeuring	
United Kingdom	– Social Security Contributions and Benefits Act 1992 – Pensions Act 2011 – Statutory Sick Pay Act 1994	NE	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.
United States	– Domestic Workers' Bill of Rights (New York) – Domestic Workers Bill of Rights (AB 241) (California)	NE	NS	NS	NS	NS	NS	NS	NS
Uruguay	– Law 16.713 (1995) – Law 18.065 (2006) – Ley 18.250 (2007) – Decree 224/007 (2007) – Ley 3/1989 – Ley 18.899 (2012) – Law 19.161 (2013)	"The work provides, as an employee, one person to another or others, or to one or more families, in order to devote to them his care and housework, in tasks related to it, without these tasks can pose to the employer direct financial gain." (Ley 18.065 y Dec. 224/007)	NS	NS	NS	NS	NS	NS	Implicitly included in standards governing working conditions.
Vietnam	– Social Insurance Law (No. 71) – Health Insurance Law (No. 28) – Labour Code	There is no legal definition for domestic worker.	NS	NS	NS	NS	NS	NS	NS
Zambia	– 7 January 2011 (The Minimum Wages and Conditions of Employment Act for Zambia)	NE	NS	NS	NS	NS	NS	NS	NS

[1] ILO, 2010a: *Decent work for domestic workers. International Labour Conference*, 99th session, 2010. Available at: http://www.ilo.org/wcmsp5/groups/public/@ed_norm/@relconf/documents/meetingdocument/wcms_104700.pdf.
[2] The social security scheme in Singapore (the CPF) is applicabled to Singapore citizens and permanent residents only. Employers must purchase a medical insurance for their domestic workers. Insurance coverage must be at least $15,000 per year (US$ 11,400) for inpatient care and day surgery. In addition, employers are also expected to cover all medical expenses in excess of, or expenses not covered by their domestic worker's medical insurance policy. Employers must purchase a personal accident insurance policy with a minimum insurance sum of $40,000 per year (US$ 30,500), and with compensation payable to the domestic worker or his/her beneficiaries (Work Injury Compensation Act). [3] The Chèque Service (employment voucher system) enables an employer to pay social insurance contribution for domestic workers, even if these workers are in Switzerland illegally.
More information: http://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---actrav/documents/publication/wcms_220717.pdf.

NS: Not specified.

Table A.4. Ratification of ILO Conventions related to domestic work

Country	Convention No. 19 ratified	Convention No. 97 ratified	Convention No. 102 ratified	Convention No. 118 ratified	Convention No. 143 ratified	Convention No. 157 ratified	Convention No. 189 ratified
Algeria	Yes	Yes	No	No	No	No	No
Argentina	Yes	No	No	No	No	No	Yes
Austria	Yes	No	Yes	No	No	No	No
Belgium	Yes	Yes	Yes	No	No	No	Yes
Bolivia	Yes	No	Yes	Yes	No	No	Yes
Brazil	Yes	Yes	Yes	Yes	No	No	No
Bulgaria	Yes	No	Yes	No	No	No	No
Cabo Verde	Yes	No	No	Yes	No	No	No
Canada	No	No	No	No	No	No	No
Chile	Yes	No	No	No	No	No	Yes
China (Hong Kong)	No	No	No	No	No	No	No
Colombia	Yes	No	No	No	No	No	Yes
Costa Rica	No	No	Yes	No	No	No	Yes
Cuba	Yes	Yes	No	No	No	No	No
Czech Republic	Yes	No	Yes	No	No	No	No
Denmark	No	No	Yes	Yes	No	No	No
Ecuador	No	Yes	Yes	Yes	No	No	Yes
Egypt	Yes	No	No	Yes	No	No	No
El Salvador	No	No	No	No	No	No	No
Fiji	Yes	No	No	No	No	No	No
Finland	Yes	No	No	Yes	No	No	Yes
France	Yes	Yes	Yes	Yes	No	No	No
Gabon	Yes	No	No	No	No	No	No
Germany	Yes	Yes	Yes	Yes	No	No	Yes
Greece	Yes	No	Yes	No	No	No	No

Country	Convention No. 19 ratified	Convention No. 97 ratified	Convention No. 102 ratified	Convention No. 118 ratified	Convention No. 143 ratified	Convention No. 157 ratified	Convention No. 189 ratified
Guatemala	Yes	Yes	No	Yes	No	No	No
Honduras	No	No	Yes	No	No	No	No
Hungary	Yes	No	No	No	No	No	No
Iceland	No	No	Yes	No	No	No	No
Indonesia	Yes	No	No	No	No	No	No
Guatemala	Yes	No	No	No	No	No	No
Ireland	Yes	No	Yes	Yes	No	No	Yes
Israel	Yes	Yes	Yes	Yes	No	No	No
Italy	Yes	Yes	Yes	Yes	Yes	No	Yes
Kenya	Yes	Yes	No	No	Yes	No	No
Korea, Republic of	Yes	No	No	No	No	No	No
Latvia	Yes	No	No	No	No	No	No
Lithuania	Yes	No	No	No	No	No	No
Luxembourg	Yes	No	Yes	No	No	No	No
Malaysia	Yes	Yes	No	No	No	No	No
Mali	Yes	No	No	No	No	No	No
Mauritania	Yes	No	Yes	Yes	No	No	No
Mauritius	Yes	Yes	No	No	No	No	Yes
Mexico	Yes	No	Yes	Yes	No	No	No
Netherlands	Yes	Yes	Yes	No	No	No	No
New Zealand	No	Yes	No	No	No	No	No
Nicaragua	Yes	No	No	No	No	No	Yes
Norway	Yes	Yes	Yes	Yes	Yes	No	No
Panama	Yes	No	No	No	No	No	Yes
Paraguay	No	Yes	No	No	No	No	Yes
Peru	Yes	No	Yes	No	No	No	No

Country	Convention No. 19 ratified	Convention No. 97 ratified	Convention No. 102 ratified	Convention No. 118 ratified	Convention No. 143 ratified	Convention No. 157 ratified	Convention No. 189 ratified
Philippines	Yes	Yes	No	Yes	Yes	Yes	Yes
Poland	Yes	No	Yes	No	No	No	No
Portugal	Yes	Yes	Yes	No	Yes	No	Yes
Romania	No	No	Yes	No	No	No	No
Russian Federation	No	No	No	No	No	No	No
Senegal	Yes	No	Yes	No	No	No	No
Singapore	Yes	No	No	Yes	No	No	No
South Africa	Yes	No	No	No	No	No	Yes
Spain	Yes	Yes	Yes	No	No	Yes	No
Sweden	Yes	No	Yes	Yes	Yes	Yes	NE
Switzerland (Canton of Geneva)	Yes	No	Yes	No	No	No	Yes
Togo	No	No	No	No	Yes	No	No
Tunisia	Yes	No	No	Yes	No	No	No
Turkey	No	No	Yes	Yes	No	No	No
United Kingdom	Yes	Yes	Yes	No	No	No	No
United States	No	No	No	No	No	No	No
Uruguay	Yes	Yes	Yes	Yes	No	No	Yes
Viet Nam	No	No	No	No	No	No	No
Zambia	No	No	No	No	No	No	No

Notes: The list of conventions considered are:

– C019 – Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19);

– C097 – Migration for Employment Convention (Revised), 1949 (No. 97); C102 – Social Security (Minimum Standards) Convention, 1952 (No. 102);

– C118 – Equality of Treatment (Social Security) Convention, 1962 (No. 118);

– C143 – Migrant Workers (Supplementary Provisions) Convention, 1975 (No. 143);

– C157 – Maintenance of Social Security Rights Convention, 1982 (No. 157); C189 - Domestic Workers Convention, 2011 (No. 189).

Source: ILO (International Labour Office): ILO Information System on International Labour Standards (NORMLEX) (incorporates the former ILOLEX and NATLEX databases). Available at: http://www.ilo.org/dyn/normlex/en/ [October, 2015].

Table A.5. Coverage of social security of domestic workers by income level, selected countries, 2009-2013

Country	Social Security coverage of domestic workers			GDP per capita, PPP (current international $) [1]	Classification of income by the World Bank, according to the GNI per capita [2]
	Percentage	Year	Note		
Bolivia	3.0	2011	[3]	6,131	Lower-middle-income economies
Brazil	42.0	2014	[4]	15,838	Upper-middle-income economies
Cabo Verde	9.0	2011	[5]	6,416	Lower-middle-income economies
Chile	42.3	2009	[6]	21,942	High-income economies
Colombia	10.8	2009	[7]	12,423	Upper-middle-income economies
Costa Rica	15.5	2013	[8]	13,875	Upper-middle-income economies
Ecuador	41.9	2013	[9]	10,890	Upper-middle-income economies
El Salvador	1.9	2012	[10]	7,764	Lower-middle-income economies
Francia	70.0	2010	[11]	38,850	High-income economies
Italy	42.2	2011	[12]	35,280	High-income economies
Mauritius	11.9	2013	[13]	17,714	Upper-middle-income economies
Mexico	0.1	2011	[14]	16,369	Upper-middle-income economies
Panama	12.7	2011	[15]	19,416	Upper-middle-income economies
Paraguay	10.0	2010	[16]	8,092	Lower-middle-income economies
Peru	7.2	2009	[17]	11,774	Upper-middle-income economies
Philippines	2.5	2012	[18]	6,535	Lower-middle-income economies
Spain	63.8	2013	[19]	33,094	High-income economies
Turkey	5.1	2011	[20]	18,782	Upper-middle-income economies
Uruguay	43.2	2012	[21]	19,594	High-income economies

[1] World Bank, 2014: GDP per capita, PPP (current international $); Catalog Sources World Development Indicators, World Bank. [2] World Bank, 2014: Country and Lending Groups. The World Bank Group, Available at: http://data.worldbank.org/about/country-and-lending-groups. [3] OIT, 2012: *Trabajo decente para las trabajadoras asalariadas del hogar en Bolivia.* Notas OIT Bolivia: El Trabajo Doméstico Remunerado (Lima). [4] IBGE (Instituto Brasileiro de Geografia e Estatística). 2014. Pesquisa Nacional por Amostra de Aomicílios – PNAD, Brasilia. [5] Fabio Durán-Valverde, José Francisco Pacheco; Joana Borges-Henrique, 2012: *A Proteção Social em Cabo Verde: situação e desafios* (Geneva, ILO). [6] OIT, 2011: *Ampliar la protección de la seguridad social para las trabajadoras domésticas remuneradas. El Trabajo Doméstico Remunerado en América Latina y el Caribe*. Notas OIT 4 (Lima). [7] OIT, 2011: *Ampliar la protección de la seguridad social para las trabajadoras domésticas remuneradas. El Trabajo Doméstico Remunerado en América Latina y el Caribe*. Notas OIT 4 (Lima). [8] Instituto Nacional de Estadística y Censos (INEC), 2013: Encuesta Nacional de Hogares (ENAHO) (San José). [9] Instituto Nacional de Estadística y Censos (INEC), 2014: Encuesta de Empleo, Desempleo y Subempleo, ENEMDU (Quito). [10] OIT, 2013: *Avance en la protección y seguridad social de las (os) trabajadoras (es) de servicio doméstico en El Salvador (San Salvador)*. [11] Olivier Wyman, 2012: *Services à la personne. Bilan économique et enjeux de croissance.* Available at: http://www.afortis-sap.fr/upload/Services%20à%20la%20personne%20%20bilan%20économique%20et%20enjeux%20de%20croissance.pdf. [12] De Luca, 2013: *Il nuovo contratto di lavoro domestico. Buffetti Editore*. Available at: http://www.studiolegaledl.it/wp-content/uploads/Guida_contratto_Lavoro_domestico.pdf; Istituto Nazionale Previdenza Sociale (INPS); 2014: *Chi è il lavoratore domestico. Il rapporto di lavoro dei lavoratori domestici* (Roma). [13] Fatadin Fatadin, 2012: *Social Protection and informal workers in Mauritius* (Johanesburg). [14] Instituto Nacional de Estadística y Geografía (INEGI), 2012: *Encuesta Nacional de Ocupación y Empleo (ENOE)* (INEGI, Mexico City). [15] Caja de Seguro Social (CSS), 2013: *La CSS en cifras. Así Avanza Nuestra Caja* (Panama). [16] OIT, 2014: *Trabajo doméstico remunerado en Paraguay* (Santiago). [17] OIT, 2011: *Ampliar la protección de la seguridad social para las trabajadoras domésticas remuneradas. El Trabajo Doméstico Remunerado en América Latina y el Caribe*. Notas OIT 4 (Lima). [18] Department of Labor and Employment (DOLE), 2013: Statistical Tables on Labor Force Survey (LFS) (Manila). [19] INE, 2013: Encuesta de Población Activa. Instituto Nacional de Estadística, Spain; Seg-Social, 2013: Statistics, Budgets and Studies. Ministry of Employment and Social Security, Spain. [20] Erdogdu, Seyhan; Toksöz, Gülay, 2013: *The visible face of women's invisible labour: Domestic workers in Turkey*. Conditions of Work and Employment Series No. 42 (Geneva, ILO). [21] Ministerio de Trabajo y Seguridad Social (MTSS), 2013: *Trabajo Doméstico e impacto de las políticas públicas en Uruguay. Evolución reciente. (Montevideo)*.