

THE TRANSNATIONALIZATION AND COMMODIFICATION
OF
CARE LABOR

A COMPARATIVE STUDY ON CONTEMPORARY ISSUES IN AU PAIR TOURISM IN NORWAY AND
AUSTRALIA WITH A STRONG FOCUS ON EMPLOYMENT LEGISLATION

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LEGISLATION

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Abstract

Au Pair tourism is an increasingly popular activity in many places around the world. Au Pair tourism has its roots in Switzerland in the mid-19th century and has ever since developed from a formerly upper-class cultural exchange phenomenon to one that now spans a broader socio-economic spectrum regarding both, host families and Au Pairs. Europe has tried to formalize Au Pair employment via a supranational European Agreement on Au Pair Placement in 1969. A handful of countries, among them Norway, have ratified and adopted this agreement and their Au Pair schemes build upon this more than four decades old legal framework. Norway's Au Pair market is thus highly formalized and regulated yet does not consider Au Pairs as workers which causes controversy and high rates of foreign workforce exploitation. Previous scholarship on this issue claims that Norway is part of a global care chain meaning the Global North exploiting the Global South. Australia, a prime Au Pair destination, has a largely unregulated Au Pair market and does not have a dedicated Au Pair scheme. In Australia exploitative working conditions for young migratory care workers seem to be the rule rather than the exception. This study investigates the advantages and disadvantages of unregulated and regulated Au Pair markets using the two cases Australia and Norway. The study was preceded by a pre-study which was conducted in the second half of 2018 in Australia. A total of 16 semi-structured interviews with researchers, organizations, and Au Pairs in Australia and Norway have been conducted and build the foundation for any conclusions in this paper. This paper also contains a model that allows to estimate the nature of the relation between certain sending and host countries, called ECDI (Econo-Cultural Distance Index). Lastly, suggestions for improvement to both the Australian and the Norwegian Au Pair employment regulations.

Keywords

Au Pair Tourism, Au Pair Employment, Conflicting Definitions, Australia, Norway, Au Pair Scheme, Workers Rights, Migratory Workers, Domestic Labor, Childcare Crisis, Exploitative Working Conditions, Cultural Exchange, Global Care Chain, Econo-Cultural Distance Index, Qualitative Study,

Synopsis

<p>Background</p>	<p>Norway and Australia are both popular Au Pair destinations with an increasing demand for foreign Au Pairs. Norway is a highly formalized and regulated market via a dedicated Au Pair scheme. This Au Pair scheme is highly disputed and permits through legal gray zones and insufficient conceptual definitions to allow the establishment of a global care chain drawing on cheap foreign labor from South East Asia and economically underdeveloped nations. Cultural exchange is promoted but hardly evident in practice. Australia has no market regulation on Au Pairs and categorizes them as working holiday makers under the working holiday scheme.</p>
<p>Problem</p>	<p>There are loud voices in Australia advocating for the introduction of a dedicated Au Pair scheme to grant families continued access to this flexible form of childcare during an ongoing childcare crisis. Several critical voices in Norway want to abolish or alter the Au Pair scheme as they consider it to contradict Norway's egalitarian values and to be a means of enabling people to hire cheap foreign domestic workers.</p>
<p>Research Question</p>	<p>First, the question is to be answered what an Au Pair is. Secondly, the popular justification of paying Au Pairs less than other comparable domestic workers. This raises the question how high the perceived and actual intangible and tangible values of the cultural exchange experience are.</p>
<p>Method</p>	<p>The study was conducted in two phases, namely a literary research and interview-based pre-study to obtain first insights on the Australian and Norwegian Au Pair markets. The core study bases primarily upon public discourse analysis, twitter data sentiment analysis, and first and foremost semi-structured interviews.</p>
<p>Result</p>	<p>Au Pairs were not able to assign a monetary value to the exchange experience component. From calculations on the Norwegian market, it became apparent that Norway implicitly appraises the annual value at the suggested workload of 30 weekly hours at more than 10,000 Euros. The study showed that the Au Pair definition provided in the Norwegian law contradicts the general principles and popular conceptions of Au Pairs. The study showed that Au Pairs in Norway conduct an overproportioned amount of housework. However, in Australia host families primarily hire Au Pairs for childminding purposes and not for domestic work. The worker status of Au Pairs is disputed. This study does not provide enough evidence to advocate for an Au Pair scheme in Australia. Yet, the study yielded results that allow the suggestion that the Norwegian Au Pair scheme needs a substantial overhaul.</p>
<p>Discussion</p>	<p>Considering the findings from this study it is highly advisable to legally review the conditions for Au Pair employment in both Australia and Norway. Both systems show great insufficiencies. Australian lawmakers should first close legal loopholes and eradicate gray zones pertaining to the employer-worker relationship of Au Pairs and host families. Norway should recognize the worker status of Au Pairs and grant them at least minimum wage. Furthermore, the legal definition of Au Pairs needs to be refined and focus primarily on childminding as the core duty of Au Pairs. The global care chain principle does not apply to Australia and was only an observable phenomenon on the Norwegian Au Pair market.</p>

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1. Introduction

How much lead does a pencil contain?

If you are one of my Scandinavian or German-speaking readers and did just translate this sentence verbatim in your mind you will probably understand why I am asking this rhetorical question.

Fortunately, pencils these days do not contain any hazardous lead. However, when you use the Google search engine to obtain an answer in German, Norwegian, Swedish et cetera you will notice that even in present-day some people fall for this etymological fallacy and wonder whether pencils contain the toxic element. Technological and societal changes can challenge and push some of our existing linguistic frameworks and conventions to their limits. Indisputably, words often change their meanings over time and approaching their meaning from an etymological perspective may only reveal information about their history but not their contemporary meaning. Some words are subject to interpretation and have thus changed their meaning as they are subject to legal and societal interpretation. The actual meaning of a word does often not correspond to its original meaning. Some foreign words have found their way into many languages and are used in an untranslated fashion often leading to regionally varying definitions based on indistinct preconceptions.

The prime example and topic of this thesis shall be the popular Gallicism “Au Pair”.

Maybe you know a former or current Au Pair. Maybe you have been one, have hired one, or know people who have hired Au Pairs. Norway has decided to introduce its Au Pair scheme with such an etymological (fallacy) explanation. “‘Au pair’ means ‘on equal terms’” (Norwegian Version: “‘Au pair’ betyr ‘på like fot’”) (Utlendingsforskriften § 6-25; UDI, 2013).

But do you know what an Au Pair is? Do you know what an Au Pair is entitled to? Depending on your geographical context not knowing the right answer to this question may cost you up to 10,000€ as in a 2016 court ruling of the highest labor court in Ireland where the judges did not quite agree with the host family's understanding of what an Au Pair is and, thus, decided that the Irish law does not provide a reason to not treat Au Pairs as regular domestic employees who are entitled to at least minimum wage (RTÉ, 2016).

Yet, Ireland is only one of the many examples of nations where there are tremendous legal uncertainty and fierce public discourse regarding Au Pair employment conditions and employment legislation.

In Norway, for instance, one of the few countries with a dedicated Au Pair scheme and stringent regulations on Au Pair employment, the Oslo City District court has in 2017 sentenced a wealthy couple to five months in jail each and several thousand dollars' worth in fines and compensation for abusing the Au Pair scheme to employ two young Filipina girls as cheap housemaids (Dagens Næringsliv, 2017). Over the big pond, not only the cars are usually larger but also the lawsuits. The recent settlement reached in January 2019 the Au Pair class-action *Beltran, et al. v. InterExchange, Inc., et al. 14-cv-03074-CMA-KMT (District Court of Colorado)* amounts to 65,500,000 USD based on wrong (too low) interpretations of sponsoring Au Pair agencies of the weekly stipend Au Pairs in America between 2009 and 2018 should be entitled to (JND Legal Administration, 2019; aupairclassaction.com, 2019). Furthermore, across the Pacific the public discourse in Australia, one of the most popular destinations for Au Pairs, heated up in 2018 when Swedish Au Pair Josefin Unefäldt was deported because of confusion over Australian Visa rules and additionally Peter Dutton, the former Australian Minister of Immigration, was put in the spotlight because of a complex Au Pair affair where

he was accused of having spared two foreign Au Pairs from deportation and having abused his ministerial powers for this (The Guardian, 2018; SBS News, 2018).

Au Pair tourism undoubtedly is a hot topic on a transnational scale and concerns a broad variety of subtopics, but first and foremost global care chains (Berg, 2015; Bikova, 2017; A. R. Hochschild, 2000; Isaksen, 2010) as well as migration and employment regulation issues, which shall be the research subject of this master thesis. A preceding research semester in Australia and private encounters and experiences over the last couple of years have inspired me to dedicate a fair portion of this master thesis to far-away 'down under'.

1.1. Thesis Background

This small sub-chapter will give an overview of the background of the critical issues that I am going to address in this research project.

One of my key motivations and core reasons for this thesis are observations of issues that I made during a former relationship with an EU Au Pair girl in Stavanger. She had been working for more than two years with the same family and cultural exchange seemed to have only played an initial role whereas there had seemed to have taken place a transition toward a regular employment situation motivated by financial aims. Interestingly, she never referred to herself as an "Au Pair". Indeed, we often discussed the issue in detail and my preconception of Au Pairs had been challenged once I noticed that it is not only a mere definitional issue but also a far-reaching employment legislation issue.

My ever-growing interest has carried on all the way through my semester abroad in Australia where I had soon noticed that the popular Au Pair destination Australia doesn't even

have an Au Pair scheme or special legislation regulating this popular variant of gap year tourism.

Therefore, I had decided to seize the opportunity there and conduct a deductively explorative pre-study to identify further key issues in Au Pair tourism. This investigative quest allowed me to draft a universal concept of these key issues in international Au Pair tourism in both Norway as well as Australia and triggered my desire to conduct this thesis based on the two research questions stated under [1.3](#), stemming therefrom.

Firstly, my private international observations on the transnationalization and commodification of childcare, care labor, and domestic work are, thus far, principally congruent with what researchers have described as *global care chains* in their studies on transnational care work and domestic work including Au Pairs (Bikova, 2015, 2017; Cox, 2014; Hess, 2009; A. R. Hochschild, 2000; Isaksen, 2010). Therefore, the research project shall carry this underlying theoretical concept in its title.

Secondly, after due consideration, an intensive review process of pertinent literature, and consultation with several scholars and thematically relevant stakeholders, I deemed it to be wise to focus my thesis project on the employment and migration regulation pertaining to Au Pair tourism in Australia and Norway rather than producing yet another study confirming the commonness of exploitative and sometimes even abusive employer – au pair relationships (Bahna, 2006; Bikova, 2008, 2015, 2017; Chuang, 2013; Seeberg & Sollund, 2010; Sollund, 2010; Stenum, 2011; Stubberud, 2015a, 2015b). A deductively explorative research approach was thus decided upon.

The public discourse on Au Pair tourism and employment in press and digital media in Australia and Norway indicates undeniably clear that certain issues need to be approached

systemically and solutions need to be developed and proposed to lawmakers in order to ensure the persistence of global Au Pair tourism movements inspired by cultural exchange motives.

My pre-study enabled me to identify some key grievances and issues in Au Pair tourism and employment in Australia and Norway:

- (1) The lack of, heavy variation of, or major incongruity in international conceptual and legal definitions of Au Pairs standing in stark contrast to general preconceptions of people and common practice often contradicting labor law and employment regulation
- (2) The inapplicability of the frequently used *Global Care Chain* concept by Hochschild, which can however be applied to the Norwegian Au Pair market, to the Australian Au Pair market that does not feed off the “*global south*”. Therefore, a different concept must be applied or created.
- (3) Critical voices label the cultural exchange component as a pretense and means to try justifying the exclusion of Au Pairs from the worker category depriving them frequently of workers’ rights, especially in Norway under the European Agreement on Au Pair Placement. Yet, the value of the cultural exchange has not been sufficiently assessed.
- (4) The exclusion of childcare as a core task from the legal definition of Au Pairs via the European Agreement on Au Pair Placement (ETS68) that Norway, among other signatories, bases its Au Pair scheme on. This legal loophole creates the possibility to hire cleaners/maids at less than 50% of the cost of an EU/EEA migrant or national Norwegian worker.

1.2. Thesis Scope

My goal has been to collect and evaluate as much primary data as possible and necessary to confirm or reject former findings of other researchers and have a strong theoretical foundation to assess the feasibility of an Au Pair scheme adjusted to the Australian market. Due to limited time, monetary resources, and access issues my thesis will build mostly upon secondary data from trustworthy and relevant sources.

Despite, I have collected and evaluated a range of data comprising twitter data, news articles, policy documents, academic publications, audiovisual material, and conducted in-depth interviews with several important stakeholders, including Au Pairs who have worked in Australia and Norway, relevant organizations, and renowned tourism scholars in order to compile a good thesis which is aimed at making a small but noteworthy contribution to the academic community.

The thesis proposal was approved in December 2018, the final registration of the research project happened in January 2019. The research project will be concluded, and the final thesis submitted for grading in June 2019.

1.3. Thesis Outline and Goals

The next part of this thesis, i.e. Chapter 2, comprises a thorough review of pertinent academic literature and relevant secondary sources on the topic of Global Care Chains, Care Work, and Au Pair tourism, especially in and to Norway and Australia. Examples from other countries, primarily Ireland (no Au Pair scheme) and the USA (stringent Au Pair scheme), with comparably similar characteristics pertaining to Au Pair employment regulation and contemporary issues in Au Pair tourism will assist to justify later assertions about the evident effects of the existence or absence Au Pair schemes. This comparatively theoretical outline of the historical development as well as the status quo regarding current legislation and regulation of Au Pair tourism in western nations will provide the reader with a clear understanding of the core issues and the research gap addressed in this study.

The second part of this thesis, namely Chapter 3, will elaborate on the applied methodologies and methods and give reason for the specific choice. This will help the reader to achieve a better comprehension of the line of argumentation in the consecutive parts of the thesis.

Thereafter, the third part, i.e. Chapter 4, will present relevant results obtained via various methods of primary data collection. These results will be analyzed and evaluated in a systematic fashion so that a cross-comparison with secondary data and previous research findings is possible and allows for an extensive discussion in the following chapter.

The final part of this paper comprises two chapters, namely Chapter 5 and Chapter 6. Chapter 5 will discuss and compare critically research findings stemming from own research and preceding scholarly work on the topic. Chapter 6 will conclude the thesis by summarizing key findings, providing a range of recommendations for policy- and lawmakers in Norway and

Australia for potential improvements in Au Pair employment regulations, as well as determining themes and issues that require further academic investigation.

After due consideration, personal observations, and review of academic publications on Au Pair tourism, I identified several research gaps. Two specific issues aroused my interest.

Firstly, other authors and I, through own observations as well as a result of my pre-study, acknowledged a large disparity and incongruity in conceptional definitions of Au Pairs in regulated and unregulated Au Pair markets, that is nations with an official Au Pair cultural exchange scheme and those without an official Au Pair cultural exchange scheme. In this case, Norway (regulated) and Australia (unregulated) shall serve as the two distinct examples of this thesis.

Secondly, *cultural exchange* has been an ever-emphasized motivation and excuse by Au Pair organizations and policymakers defending Au Pair schemes that exclude Au Pairs from being subjects treated under regular labor law and legislation. Several academic studies suggest that cultural exchange plays only a secondary or even often no role in Au Pairing in Norway. The situation in Australia is still assessed insufficiently.

Chuang (2013) who argues that Au Pair schemes are a cultural exchange subterfuge that create an underclass of migrant domestic workers deprived of many labor rights and standards. Her provoking claim that *“(..) the legal categorization of au pairs as ‘cultural exchange participants’ is strategically used to sustain— and disguise—a government-created domestic worker program to provide flexible, in-home childcare for upper-middle-class families at below-market prices”* (Chuang, 2013, p.269) builds an ideal thematic bridge toward my research questions which shall pervade the whole of this thesis:

Research Questions

1. How well do the contemporary meaning and conceptual definitions of Au Pairs correspond to the existing Au Pair employment regulations in Norway and Australia?
2. What are the tangible and intangible value of the cultural exchange experiences of Au Pairs in regulated (Au Pair scheme) and unregulated (no Au Pair scheme) markets by the example of Norway and Australia?

2. Literature Review and Theoretical Background

This chapter shall provide an in-depth review pertinent literature and research findings from preceding research on the topic of global care chains and Au Pair tourism. Various conceptual and legal definitions of Au Pairs will be provided. The historical development of Au Pair tourism will be illustrated as well. Lastly, evident contemporary legal, social, and political issues in Au Pair tourism and employment will be presented.

2.1. Global Care Chains and Care Labor

Global labor migration flows, according to Misra, Woodring, and Merz (2006), have substantially changed over the last few decades so that . They conclude that globalization is the driving force behind today's worker mobility. Furthermore, it is assumed that there is a global system in which care labor is distributed so that financially underprivileged women migrant workers provide their services for richer families (Misra et al., 2006). Noteworthy, women account for more than 50 percent of global migration flows whereas the leading generating nations are the Philippines, Indonesia, and Sri Lanka (Gather, Geissler, & Rerrich, 2002; Lutz, 2002; Sassen, 2003).

Female immigrant workers, who often but not always are part of the global care chain, carry out significant amounts of care work in North-America, Europe, East Asia, the Middle East, and noteworthy Australia (Misra et al., 2006; Pyle, 2001; Pyle & Ward, 2003).

Arlie A. R. Hochschild (2000) coined the term *global care chain* in 2000 and referred to it as "(...) a series of personal links between people across the globe based on the paid or unpaid work of caring" (p.131).

Parreñas (2003, p. 25) states that in a globalized world “(..) *the rise of neo-liberalism in the global south pushes women into migrant domestic labor and the similar rise of neo-liberalism in the global north directs their flow*”.

The concept has gained popularity and faced some redefinitions so that Yeates (2005) argues from a more contemporary feminist standpoint that a working woman in a wealthy country is unable to keep up her household duties and childcare and therefore uses the opportunity to purchase the domestic labor of another woman from either a poorer household or a poorer country abroad.

It is often the case that the hired woman is a wife and/or mother herself in her home country. Especially South-East-Asia, e.g. the Philippines, are known as large source-countries (Bikova, 2015, 2017; Dalgas, 2015; Hess, 2009; A. R. Hochschild, 2000; Isaksen, 2010; Schilliger, 2013; Seeberg & Sollund, 2010); Yeates (2005).

A rising demand for domestic workers can, according to Yeates (2005), be attributed to demographic effects, labor market and miscellaneous welfare factors. Furthermore, the expression of social relations and global economic and social status inequalities can be observed in the employment of domestic labor through the global care chain (ibid., 2005).

Kilkey (2010) emphasized in a study that men, though being a minority, have been vastly neglected in research global care chains which has led to an over-feminization of scholarship on globalization and migration.

Misra et al. (2006) have carried out a comparative study on globalized care work and migration flows. They suggest that increasingly neoliberal economic structures and favorable labor migration policies in wealthy receiving countries act as a catalyst for higher demand of

domestic labor in the global north and growing care labor migration flows from poor to rich countries.

A large part of the global care chain seems to be the natural condition that labor migrants transfer valuable foreign currency to their families back home (Basa, Harcourt, & Zarro, 2011; A. R. Hochschild, 2000; Isaksen, 2010; Misra et al., 2006).

Basa et al. (2011), thus, see the global care chain as a sort of socially and culturally critical trap-mechanism for female migrants from the Philippines. They state that “[t]he pressure to send remittances back home is locking these women even further into the global care chain (..)”. (Basa et al., 2011, p. 11)

2.2. Overview on Au Pair Tourism

The following subchapter will feature a short historical overview on Au Pair tourism and will furthermore provide a range of relevant conceptual and legal definitions of Au Pairs. Universal definitions will be supplemented by a selection of country-specific definitions and conceptual clarifications of Au Pairs in the nations of Norway, Ireland, The United States of America, and Australia. Despite the thesis focus mainly lying on Norway and Australia, I deemed a cross-comparison with two other nations to be justified since they will later help making references to strictly regulated Au Pair markets (Norway, USA) versus de- or unregulated Au Pair markets (Ireland, Australia).

2.2.1. Brief History of Au Pair Tourism

To later be able to answer the questions asked in this thesis in their entirety, it is of utmost importance to provide a good overview on the historical development of Au Pair tourism on a global as well as on a local scale pertaining to Norway and Australia. Hence, this subchapter will illustrate significant events and milestones in the history of the evolution of Au Pair tourism from its beginnings in the mid-1800s, the post-World War II era, up to present day. Figure 1 and Figure 2 summarize the following events visually and can be used as a reference point throughout the thesis.

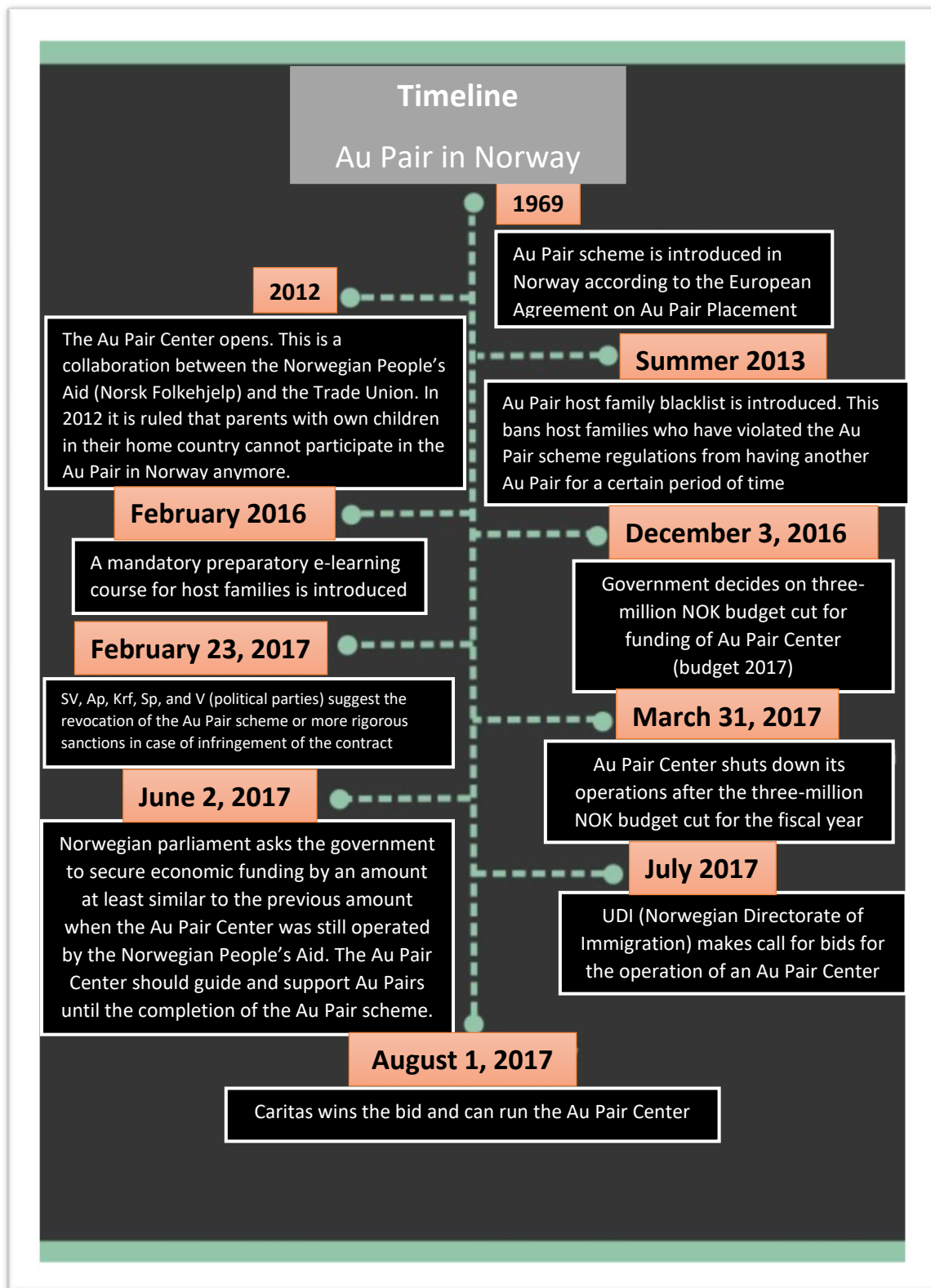


Figure 1: Historical Timeline of the Au Pair Scheme in Norway from 1969 until 2017; Translation by Author. Norwegian Original: journal.oslomet.com (2018)

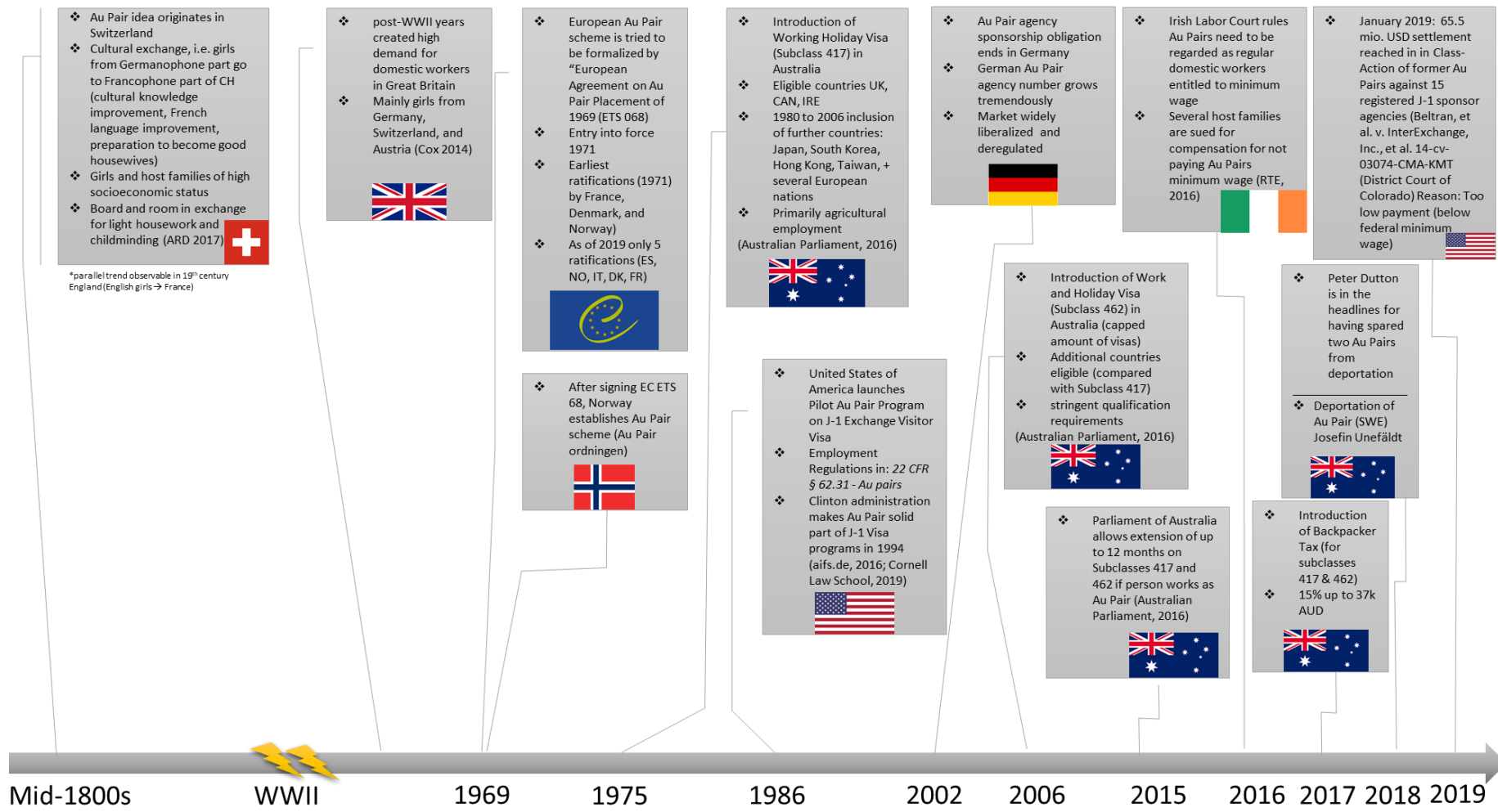


Figure 2: Timeline of The Evolution of The Au Pair Showing Significant Events Worldwide; Author (2019)

2.2.1.1. *The Early Beginnings (Mid-19th Century) until World War II*

According to ARD (2017) the Au Pair concept saw its early beginnings in Switzerland in the mid-19th century and used to mean a cultural exchange of young girls from wealthy families going from the Germanophone to the Francophone part of Switzerland. The primary goal was to prepare the young girls to become good housewives one day and learn about a different culture and improve their French-speaking skills. The girls would provide part-time domestic labor including light-duty housework and childminding for the host family in exchange for board and room. The aforementioned part-time work relationship indicates already that enough time was granted the Au Pair girl to focus on cultural and language studies besides their provision of domestic work (ibid., 2017). Rohde (2013), however emphasizes that the verbum coniunctum “au pair”, which translates literally to “at par” or “equal to” appeared in France at around the same time as in Switzerland and described the cultural exchange stays of English girls in French upper-class households (cf. Rohde, 2013, p.23).

Relatively soon clerical welfare organizations operated by the Evangelical and Catholic churches took a significant stake in helping young girls and assisting them with organizing their Au Pair stays abroad. First, the Evangelical *Deutscher Verein der Freundinnen* (today: *Verein für internationale Jugendarbeit*) was founded in 1877 in Geneva and took up the beforementioned cause. Just a bit later, in 1897, the Catholic *Katholischer Mädchenschutzverein des Deutschen Caritasverbandes* (today: *in via*) supported Au Pair girls and host families in their interests.

2.2.1.2. Post – World War II Era until 1968

Liarou (2015) considers the cultural Au Pair program of Britain to have already been before WW II a disguised means of hiring cheap domestic workers from abroad. Although, the foreign Au Pair visitor as a mass-phenomenon has seen its first significant beginnings in Britain the 1930s but can also be linked to back-door permanent migration (ibid., 2015).

The time after the second World War saw a remarkable rise in demand for domestic workers in Great Britain (Cox, 2014). This demand stemmed from the servant-less British middle-class which, according to Liarou (2015), tried to find their way out of a so-called “*servant crisis*”.

2.2.1.3. 1969 (ETS 68) until 2001

After World War II, Au Pair tourism became an ever-growing, but immensely unregulated, European temporary labor migration phenomenon so that the European Council called for more regulation and decided to draft a norming treaty in 1969 that is called “European Agreement on Au Pair Placement” (ETS 68). This treaty comprising 22 articles went into force in 1971 and shall later be explained in further detail in this chapter (Hess, 2009). This treaty has not proven to be very successful and only ratified three nations, namely Denmark, France, and Norway, in the year of the entry into force (EC, 2019). The year of the signing by Norway marks officially point in time when the foundation stone of the Norwegian Au Pair scheme (*au pair ordningen*) was laid.

In 1975, Australia introduced its Working Holiday scheme associated with the Visa Subclass 417 which was initially open to three nationalities, namely the United Kingdom,

Canada, and Ireland (Australian Parliament, 2016). The list of eligible nationalities was later to be expanded significantly from 1980 to 2006. This visa was not dedicated to Au Pair employment but suited that purpose just as well.

Nine years later, in 1986, the United States of America started a pilot Au Pair program run under the J-1 exchange visitor visa scheme. All Au Pairs must use official government-licensed sponsors (agencies). The scheme proved to be successful and was adopted into the list of permanent visa programs in 1994 under Bill Clinton (AIFS, 2016; Cornell Law School, 2019).

In 1994, the monopoly of church-related welfare organizations for Au Pair matching and recruitment in Germany, mentioned earlier, was lifted and other private sponsoring organizations were allowed to participate in the Au Pair recruitment market (Rohde, 2013).

2.2.1.4. 2002 (German Au Pair Market Liberalization) until 2019 (US Class-Action)

2002 marks the year from which the European labor market became more liberalized and Germany just so decided to liberalize the Au Pair labor market likewise. The obligation of going through Au Pair sponsoring agencies, previously licensed by the Bundesagentur für Arbeit (Germany's State-funded Employment Agency), was lifted and a mere trading license has ever-since been sufficient to act economically as an Au Pair matching and recruitment agency (Hess, 2009; Hess & Puckhaber, 2004)

The Australian market saw some changes for temporary labor migrants in 2006 when the nation introduced the novel Work and Holiday scheme corresponding to Visa Subclass 462 (Australian Parliament, 2016). The rules were slightly stricter, different nations were

permitted to participate, and the usual function of the visa was to employ youths and backpackers in the agricultural sector, mostly as seasonal workers (Kawashima, 2012).

In 2012, the Norwegian People's Aid (Norsk Folkehjelp) and the trade union (Fagforbundet) cooperatively open the Au Pair Senter (Au Pair Center) to help Au Pairs with issues. In the same year, Norway officially prohibits women that have own children in their home country to participate in the Norwegian Au Pair scheme. A blacklist for severely uncompliant host families is introduced in 2013 (journalen.oslomet.no, 2018; cf. Figure 2).

In 2015, the Australian Parliament decided to grant extensions by request for up to 12 months on both visa subclasses 417 as well as 462 if the participant has used the visa to work as an Au Pair in Australia (Australian Parliament, 2016).

In 2016, Norway introduces an obligatory e-learning Au Pair course for host families. The government decides on a 3 million NOK budget-cut to the Au Pair Center (journalen.oslomet.no, 2018; cf. Figure 2)

2016 also marked a turning point for Au Pairs and host families in the Republic of Ireland. When a former Spanish Au Pair was granted by the Workplace Relations Commission (Labor Court) more than 9,200 Euros in compensation from their host family for having not paid her as a regular employee according to the National Minimum Wage Act 2000 (thejournal.ie, 2016). Several other lawsuits followed as the employment status of Au Pairs in Ireland was thence to be a normal employee eligible for certain rights and benefits, among them first and foremost the entitlement to the hourly minimum wage (9.80€/h as of 2019). The court ruling is ever-since feared to have signaled the imminent extinction of the Au Pair tradition in Ireland (WYSE Travel Confederation, 2016; Houses of the Oireachtas, 2016).

One year later, from 2017 on, in Down Under the Australian government started to collect a colloquially-called “backpacker tax” of 15% on up to 37,000 AUD for any temporary migrant workers holding a visa of subclass 417 or 462, thus including Au Pairs (ABC News, 2016; Australian Taxation Office [ATO], 2018).

Norway has a large debate on its Au Pair scheme in 2017 and the Au Pair center eventually shuts down. During the same year, the Au Pair center operation is decided to be handed to the winner in a tendering round. Caritas wins the tendering round and thence operates the Norwegian Au Pair Center (journalen.oslomet.no, 2018; cf. Figure 2)

In 2018, Australia deported Josefin Unefältdt, a Swedish Au Pair, and sparked a heavy discussion on migration rules for Au Pairs in Australia (SBS News, 2018). Together with the Peter Dutton Au Pair affair, who allegedly abused his ministerial powers to spare two foreign Au Pairs from deportation, and which peaked (cf. Appendix 8.1.) in the summer (northern hemisphere) of the same year, 2018 has proven to be one of the most turbulent years regarding public discourse on Au Pair tourism in and to the southern continent (The Guardian, 2018).

In the USA, a landmark class-action lawsuit against 15 Au Pair J-1 sponsoring Au Pair organizations has been settled at the District Court of Colorado in January 2019. The Au Pairs were found to be underpaid, i.e. below the federal minimum wage, under the current Au Pair employment legislation (cf. 22 CFR § 62.31). The class-action *Beltran, et al. v. InterExchange, Inc., et al. 14-cv-03074-CMA-KMT* was settled for 65.5m USD. Approximately 100,000 Au Pairs could file for a claim of compensation money. (JND Legal Administration, 2019; aupairclassaction.com, 2019)

2.2.2. Relevant Conceptual and Legal Definitions of Au Pair

The following parts will provide conceptual and legal definitions for Au Pairs going from universally valid definitions toward definitions and conceptualizations of specific countries.

2.2.2.1. *Universal Definitions and Conceptualizations*

The renowned Professor Rosie Cox summarized the work of Au Pairs in a recent publication under the headline as “*the work that non-workers do*” (Cox, 2018, p. 3). Certainly, this is neither a universal definition nor a complete definition at all, yet it points straight the definitional question about the worker status, respectively non-worker status of Au Pairs in many places.

This subchapter will illuminate two universal definitions for Au Pairs. They will function as a reference point for the further discussion on country-specific definitions and concepts.

2.2.2.1.1. *International Labor Organization (ILO)*

The International Labor Organization (ILO) has uttered in its 2010 report on *Decent Work for Domestic Workers* a distinct statement on the conceptual status of Au Pairs having labeled it “The au pair exception” (ILO, 2010). At the time when the report was published no country did specifically include Au Pairs in the definition for domestic workers, but Switzerland and Portugal have specifically excluded Au Pairs from the definition scale for domestic workers.

The ILO (ibid., p.34) concluded:

“Au Pair programs allow young people to travel abroad and live with another family for a year or two, on what is often a first cross-cultural exchange. It also offers them an opportunity to learn a different language. But to earn their board, lodging and pocket money, au pairs also work, usually by providing assistance in childcare, caregiving and housekeeping.”

However, the ILO (ibid., p.34) added the following opinion and contemplated that *“(...) it is still appropriate to treat the au pair relationship as an exception to the definition of domestic worker in a new international standard. It might well be fully compatible to consider au pairs as both workers and youth on a cultural exchange, and to regulate their working conditions appropriately. This might help to prevent the kind of exploitation of au pairs that is comparable to that of other categories of domestic workers.”*

Nevertheless, the ILO (2012) clearly utters reservations towards existing Au Pair schemes in Europe that encourages a situation where “domestic workers in Europe [are] falling through loopholes” and that the Au Pair system, despite its appeal to young people, *“(...) has increasingly become a way for families to compensate for the lack of public structure for child care”*. The latter point of critique applies rather to Australia than to Norway.

2.2.2.1.2. International Au Pair Association (IAPA)

The Munich based International Au Pair Association, which will celebrate its 25th anniversary this year, defines Au Pairs both from an etymological as well as contemporarily conceptual standpoint by stating that:

“The actual term “au pair” means ‘on par’ or “equal to” in French and that is exactly what being an au pair is all about – becoming an equal member of your host family during your placement. Looking after children and integrating with your host family in a caring home environment gives you the incredible opportunity to learn about a different culture while also sharing your own. Au pairs also have the possibility to study alongside childcare hours.” (IAPA, 2019)

Furthermore, they define clearly that an Au Pair can be male or female, is usually from 18 to 30 years old, depending on the destination can work for three to twelve months, must in some cases provide childminding experience, have a clean police record, be in good health condition, and know the basic language of the destination. (ibid., 2019).

2.2.2.1.3. Greataupair.com Definition Interpretation in Bahna, Miloslav (2006)

Bahna (2006) has examined several definitions of Au Pairs for his early-2000s study. The chosen definition was labeled as being somewhat universally applicable. However, it now contradicts partially various recent court rulings and legal decisions in several countries among them the nations which are the main focus of this study, namely Norway and Australia.

Bahna (2006, p.248) summarizes that an Au Pair is usually a “(...) a girl (rarely a boy) in the age of 17 – 27 years who is not considered to be a specialist in childcare providing (...)” whereas the Au Pair is on “(...) cultural exchange and is not considered to be an employee”. Bahna (ibid.) adds that the Au Pair “is paid ‘pocket money’ which is not a subject to taxation”.

2.2.2.2. Significant European Examples

The following section will introduce and outline the key points of the European Agreement on Au Pair Placement of 1969, which Norway has signed and ratified. Furthermore, the country-specific definitions of Au Pairs by various relevant stakeholder organizations will be summarized in a systematic fashion.

2.2.2.2.1. European Agreement on Au Pair Placement (ETS 68 of 1969)

The European Agreement on Au Pair Placement of 1969 (European Treaty Series 68) creates a frame for nationally specific Au Pair schemes that, if the respective country ratified the treaty, is legally binding and mandatory to adhere to. Norway together with four other countries has signed and ratified the agreement. Therefore, the Norwegian Au Pair scheme is predominantly based on what ETS68 defines. The treaty comprises 22 articles which define conditions for Au Pair placement in European countries (cf. Appendix 8.2.).

The European Council (EC) suggests that *"(...) persons placed "au pair" belong neither to the student category nor to the worker category but to a special category which has features of both, and that therefore it is useful to make appropriate arrangements for them."* (ETS 68, preamble).

The Council of Europe goes on and defines in Art.2 that *"Au pair" placement is the temporary reception by families, in exchange for certain services, of young foreigners who come to improve their linguistic and possibly professional knowledge as well as their general culture by acquiring a better knowledge of the country where they are received."*

The treaty can be found in its entirety in the appendices under 8.2.. I will at this point summarize the most significant articles of the agreement and their importance:

Article 3: Au Pair scheme participation max. one year (extension via permit to max two years)

Article 4: Au Pair min. 17 years – max. 30 years of age

Article 5: Au Pair needs to provide a recent physical

Article 6: Rights and duties of Au Pairs and host families shall be anchored in a written agreement (ideally before Au Pair starts working)

Article 8:

- board and lodging + separate room for Au Pair
- Au Pair receives free time to attend language courses and enjoy culture
- min. one free day per week / at least one Sunday per month
- Au Pair shall receive “pocket money” determined in written agreement

Article 9: Au Pair helps with light day-to-day family duties. Max. five hours per day → max. 30h/week

Article 10: Au Pair receives free health care by state or private insurance paid by host family

Article 11: Two weeks’ notice for contract termination on both sides

2.2.2.2.2. Norway

As mentioned before, Norway is one of the signatories and ratifying states of the European Agreement on Au Pair Placement. Large parts of the above-mentioned key points will be reflected in the following section which is dedicated to illustrating the current Au Pair

scheme and Au Pair employment regulations of Norway. Norway has as of now not ratified the International Labor Organization's Domestic Workers Convention (No.189) which went into force on the 5th of September 2013 (ILO, 2019; Løvdal, 2012).

2.2.2.2.1. Utdanningsdirektoratet

The Norwegian Directorate for Primary and Secondary Education (Utdanningsdirektoratet, 2019) describes and defines an Au Pair (outgoing and incoming) as follows:

«Som au pair bor du hos en vertsfamilie som gir deg kost, losji og lommepenger, mot at du passer barna deres og gjør litt lett husarbeid. Som au pair er det vanlig at du har ditt eget rom og kanskje eget bad, og du har hele tiden ansvar for å holde dette rent og ryddig» (Norwegian Original)

“As an Au Pair you are living with a host family who shall give you board, room, and pocket money in exchange for you minding their children and doing a bit of light-duties in the house. As an Au Pair you usually have your own room and maybe your own bathroom and it is your obligation to keep it nice and clean” (English Translation)

Furthermore, the Utdanningsdirektoratet goes on and outlines usual tasks and duties of an Au Pair:

- Childminding day and nighttime
- Light-duty chores (e.g. doing laundry)
- Play with kids
- Walk the dog and do grocery shopping
- Bring kids to school and pick them up

- 30h/week max.
- 1 to 1 ½ free days per week
- 1-week vacation per half year

2.2.2.2.2. Utlendingsforskriften §6-25: "Oppholdstillatelse til au pair"

This subchapter will illustrate some crucial key points of Norway's Au Pair scheme. The legal foundations of Norway's Au Pair scheme are laid in the regulation pertaining to *Residence Permits for Au Pairs* (Oppholdstillatelse til au pair) in its Immigration Act Section 26 (Utlendingsloven § 26).

Firstly, the law regards non – EFTA or EU nationals that need to apply for a residence permit in Norway in order to be allowed to become an Au Pair.

The law defines this special category of cultural exchange tourists as follows:

“Au pair’ means ‘on equal terms’. (..) In exchange for certain services, young foreigners who come to improve their linguistic and possibly professional knowledge as well as their general culture [acquire] a better knowledge of [Norway]. The services (..) can consist of light housework and childminding.” (UDI, 2019)

Furthermore, the Au Pair scheme ever-more clearly emphasizes that *“[a]n au pair shall not be a domestic help or childminder”*.

An Au Pair in Norway shall apply for a residence permit in her/his home country, must not be younger than 18 years of age and not older than 30 years of age, and an Au Pair must not have own children.

The Norwegian Au Pair scheme does not permit Au Pairs to work for her/his own relatives or people of the same nationality since knowledge of the Norwegian language and culture is supposed to be acquired by the Au Pair.

The scheme also stipulates the *lingua franca* at home which shall be Norwegian at most times.

With regards to the latter point, it should be acknowledged that the reality deviates heavily from the described and desired state. In 2014, the Norwegian Directorate of Immigration (UDI) proposed certain changes in the regulation to the government that had aimed at emphasizing and ensuring the cultural exchange component of the Au Pair scheme.

The UDI requested that Au Pairs and host families must not have the same native language. Furthermore, the UDI requested that host families should have resided for at least ten years in Norway in order to qualify for hiring an Au Pair. Lastly, they asked for a new rule that would disqualify Au Pairs from participation in the Norwegian Au Pair scheme in case they had previously worked as an Au Pair in any Nordic country. Nina Mørk, then director of the Department of Justice and Public Security, had declined all changes to the scheme proposed by the UDI. (GI-08/2014; regjeringen.no, 2014)

2.2.2.2.3. *Ireland*

The legal situation regarding Au Pair employment has drastically changed after 2016 when the Irish Labor Court ruled that Au Pairs are to be treated as regular domestic workers and thus enjoy full benefits according to existing labor law entitling them, among other benefits, to at least the minimum wage of currently 9.80€/h (Ronan Daly Jermyn, 2016; Lexology, 2018; Migrant Rights Centre Ireland, 2018). Consistent with statistics in Bahna

(2006), Ireland used to have the highest relative demand for Au Pairs (0.259 Au Pairs per 10,000 inhabitants) among all countries in Europe in 2005.

2.2.2.2.3.1. Migrant Rights Centre Ireland (MRCI)

The Migrant Rights Centre Ireland (MRCI) endorses the recent labor court ruling pertaining to the recognition of Au Pairs as regular domestic employees in Ireland. Their reference point of reasoning is that the ILO Domestic Workers Convention, which Ireland ratified in 2014, is incorporating the Au Pair in the domestic worker definition and thus legally obliging the Irish state to classify and protect Au Pairs according to National Minimum Wage Act 2000 (MRCI, 2018).

Therefore, Au Pairs in Ireland are entitled to the following working conditions and benefits:

- Written work contract
- National minimum wage (as of 2019, 9.80€/h)
- Statement of wages
- Max. 48h work per week
- Breaks, public holidays, annual leave, and a Sunday premium
- Minimum time of notice
- Registration as an employee with Revenue and Department of Social Protection
- Freedom from discrimination
- Benefits in case of maternity

Furthermore, the MRCI (ibid.) defends the status quo and speaks out against the introduction of a dedicated Au Pair scheme and discourages the ratification of the

European Agreement on Au Pair Placement (ETS 68) of 1969. Their official stance is that “(...) such agreements create a hierarchy of workers and workers' rights and add to the devaluing of important work carried out primarily by women”.

2.2.2.3. United States of America

In 1986 the United States of America initiated a pilot program for European Au Pairs, a so-called Au Pair program, on the basis of the J-1 cultural exchange visa (Geserick, 2009). The program was deemed successful after a short while and thus became a substantial part of the several J-1 Visa program options. The USA has a detailed regulatory framework for the employment conditions of Au Pairs, which is to be found under the Code of Federal Regulations, i.e. 22 CFR § 62.31 - Au pairs (Cornell Law School, 2019).

2.2.2.3.1. 22 CFR 62.31 - Au Pairs

The Code of Federal Regulation regulating Au Pair tourism and employment in the USA, namely 22 CFR § 62.31 - *Au pairs*, provides a clear definition of Au Pairs in the first of the 16 paragraphs of the law. *Paragraph (a)* clearly states that Au Pairs are

“(..)foreign nationals [that] are afforded the opportunity to live with an American host family and participate directly in the home life of the host family.”

Furthermore, the American government defines that: *“all au pair participants provide childcare services to the host family and attend a U.S. post-secondary educational institution.”*

2.2.2.4. Australia

This section is dedicated to presenting an overview of legal interpretations and conceptual definitions of Au Pairs in the Australian context.

Australia does as of 2019 not have a dedicated Au Pair scheme and according to the Addati, Cattaneo, Esquivel, and Valarino (2018) Australia's migration policy aims at favoring *"(...) skilled occupations (defined by the salary level) and does not encourage migrant childcare workers and nannies"* (p. 207) so that Au Pairs have to use working holiday visas.

2.2.2.4.1. Australian Taxation Office (ATO)

The Australian Taxation Office (ATO, 2018) has given the following advice on request of a potential Au Pair host family that was concerned about taxation rules applying or not applying to the employment of Au Pairs in Australia. In the advice from August 3, 2018, the ATO (2018) states that

"Traditionally, au pairs came to Australia on a cultural experience and were treated like members of the family, helping out with incidental childcare in exchange for the Australian experience and some pocket money. (...) They would not be expected to work during their study hours. This type of au pair were commonly referred to as 'demi au pairs' and it was expected that the au pair must enrol in an English language or other academic program (...).

While this type of au pair still exists, the cultural exchange factors have diminished and the distinction between an au pair engaged as part of a cultural experience and an au pair employed purely for domestic and childcare assistance has blurred."

The ATO also points to the control test to assess whether a legal or even taxable employment situation exists between two or more people. Thusly, host families must examine

the nature of the Au Pair – host family relationship in accordance with *Hollis v Vabu* (2001) 207 CLR 21; 47 ATR 559.

The ATO directed the family, which most likely resembles the rule than the exception according to , to consider the Au Pair to be an employee since the most families exercise ‘control’ over what, when, how, and where some tasks are supposed to be executed by the Au Pair.

Thus, the ATO recognizes the special historic tradition and new interpretations of Au Pairs but does not provide a formal definition so that merely a hint is given that most likely the majority of Au Pairs hired in Australia are to be considered domestic employees, host families registered employers, and the income of Au Pairs subject to 15% taxation.

2.2.2.4.2. Fair Work Ombudsman

The Fair Work Ombudsman of Australia (fairwork.gov.au, 2019) states clearly that Au Pairs are usually employees and are generally working long hours as live-in domestic employees while their main task should be childminding. However, the Fair Work Ombudsman also explains when Au Pair working relationships are of non-employee nature, concludingly the mere minority (cf. Berg et al., 2018), “[f]or example, some au pairs are from overseas and live with families in Australia primarily for a cultural experience. They only give the family a small amount of assistance looking after children.”

Nannies, so the Fair Work Ombudsman (ibid., 2019), can be independent contractors and don’t need to be employed with the respective family.

2.2.2.4.3. Cultural Au Pair Association of Australia (CAAPA)

The Cultural Au Pair Association of Australia (CAAPA, 2019) gives families the following advice on how to judge whether the person they are hiring for childcare and domestic work is to be considered an Au Pair or an independent childminding contractor eligible to hourly wage rates. They claim that a live-in situation disqualifies an Au Pair from gaining employee status and accordingly needs to be paid a mere pocket money.

The functional definition of an Au Pair is stated by the CAAPA as:

“Au Pairs participating on an Au Pair cultural exchange experience will come to Australia on a Working Holiday or Work & Holiday visa and generally stay with a family from 6-12 months.”

Furthermore, “(...) au pairs expect to live with your family and be invited to participate in family activities. Au Pairs will care for your children for a maximum of 40 hours per week and receive a weekly pocket money and their own room, with meals provided.”

2.3. Transnational Comparison of Au Pair Employment Legislations

This chapter aims at clarifying and comparing the current Au Pair employment policies of Norway and Australia, as well as the legislative employment conditions regarding Au Pairs in Ireland and the USA. Despite the thesis focus lying on Australia and Norway, Ireland and the United States of America embody ideal reference cases due to their matching characteristics that allow a comparative pairing, i.e. Australia <-> Ireland (no Au Pair scheme, working holiday visa approach) vs. Norway <-> USA (rigorous Au Pair employment legislation, Au Pair scheme).

I must concede to my alert readers that the comparability of legislations between the countries stated above is limited due to different underlying legal systems that differ in function and need for interpretation. As apparent in Figure 3, Norway applies the Nordic variant of civil law whereas the United States of America, Ireland, and first and foremost, Australia's govern according to common law.

Deakin, Lele, Street, EC2A, and Siems (2007) support the *legal origins hypothesis* which claims that regulatory styles are heavily influenced by the locally applied principal legal families, i.e. first and foremost Common Law as well as Civil Law (French, German, Nordic variants) (cf. Figure 3). Originally stemming from financial and business law, this hypothesis has gained popularity with scholars who managed to apply it to the field of labor law (Djankov, La Porta, Lopez-de-Silanes, & Shleifer, 2008). Furthermore, the legal origins effect describes the speed of potential adaptation of legal changes. It is said that common law, based on case law, offers the possibility of incremental and dynamic policy adaptations, whereas civil law, based on codes, permits only periodic changes (Deakin et al., 2007). Thus, Deakin et al. (2007, p. 153) concluded regarding labor law adaptability efficiency that “(..) *common law systems are more likely to produce efficient rules than their civil law counterparts*”

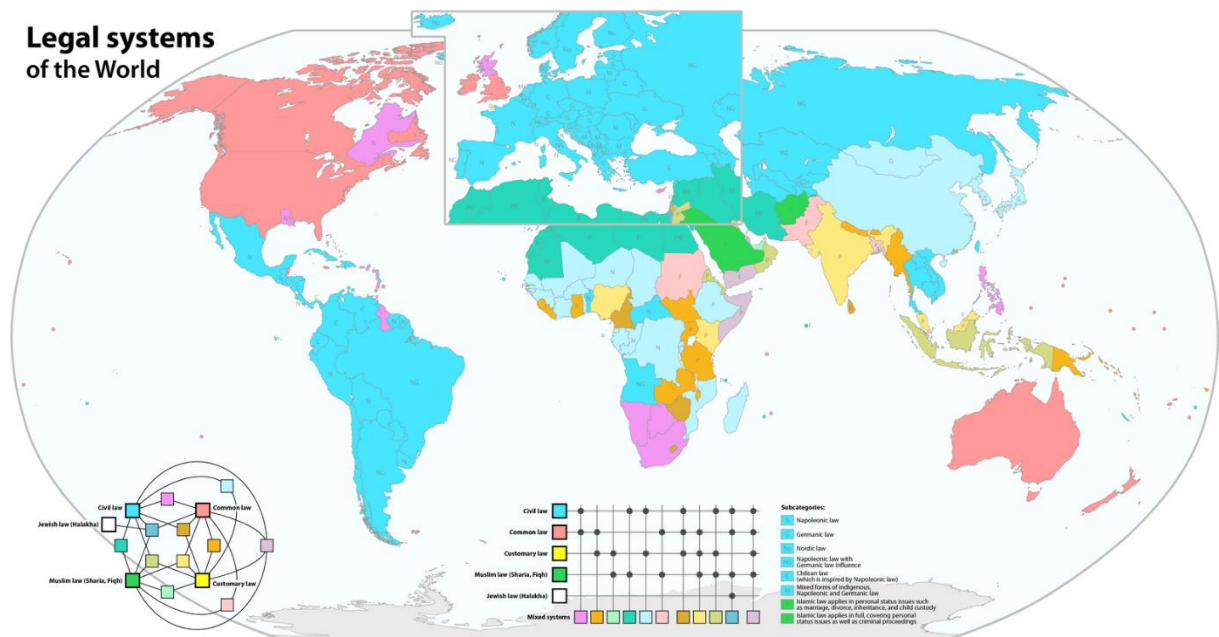


Figure 3: Map of the Legal Systems of the World; Dörrbecker, M. (2018), Wikimedia Commons

2.3.1. Norway

Norway was among the first three European nations to sign and ratify the European Agreement on Au Pair Placement of 1969 (ETS 68), which entered into force in 1971 (European Council, 2018). The Norwegian Au Pair scheme (Au Pair Ordningen) is therefore supposed to be in compliance with terms and conditions agreed to in the abovementioned European legal framework.

The European Council does not mention childminding or taking care of children in any way, neither literally nor descriptively, in its European Agreement on Au Pair Placement (ETS 68) and thus permitted Norway to establish a legal definition of Au Pair host family that does not entail having to be parents to qualify for hiring an Au Pair.

Utlendingsdirektoratet (2016) states under 3.2.1. «Definisjon av Vertsfamilje» in Utlendingsforskriften § 6-25:

«Med "vertsfamilie" menes ektepar, partnere eller samboere med eller uten barn, eller enslig forelder med barn. Enslige personer uten barn omfattes ikke av begrepet vertsfamilie».

Thus, the Norwegian Au Pair scheme regards "host families" to be either married couples, couples in civil union, with or without children, or single parents with one or more children. Single persons must not be considered host families in a legal sense under the Au Pair scheme, if they don't have at least one child.

This grants child-less couples the opportunity to hire foreigners on an Au Pair visa to execute housework, such as cleaning, for significantly lower hourly wage rates (30hours per week for 5900NOK + board and room + 8850 NOK per annum for Norwegian courses from April 1, 2019) than the occupation-specific minimum wages stated by the Norwegian Labor Inspection Authority (Arbeidstilsynet). For instance, a housecleaner is entitled to a base wage rate of NOK 181.43 per hour (Arbeidstilsynet, 2019).

Ironically, Arbeidstilsynet states the following in the preface of minimum wage overview:

"Even if there is no general minimum wage in Norway, minimum wages ha[ve] been introduced in certain sectors in general application of collective agreements.

General application of collective agreements is one of a number of instruments to prevent foreign workers from being given poorer pay and working conditions than are usual in Norway." ([https://www.arbeidstilsynet.no/en/working-conditions/pay-and-minimum-rates-](https://www.arbeidstilsynet.no/en/working-conditions/pay-and-minimum-rates-of-pay/minimum-wage/)

[of-pay/minimum-wage/](https://www.arbeidstilsynet.no/en/working-conditions/pay-and-minimum-rates-of-pay/minimum-wage/), accessed on Feb 12.02.2019)

The European Agreement on Au Pair Placement and the Norwegian Au Pair scheme based thereon exclude Au Pairs from the worker category. This currently means that regular labor laws and regulations in Norway don't have to be applied to Au Pairs. Løvdal (2012) interprets the law contrarily and says that Au Pairs the regulation on domestic work in Norway (*Forskrift om husarbeid, tilsyn og pleie i privat arbeidsgivers hjem eller hushold*) legally assigns them to the worker/employee category, if they have executed domestic labor for eight hours in one week or more hours in one month (cf. § 1 Forskrift om husarbeid).

In 2008, there had been a clarifying, though not legally binding, court ruling on the employment status of Au Pairs in Europe. The European Court (Third Chamber) ruled on January 24, 2008 in *Case C-294/06 Ezgi Payir et al. versus Secretary of State for the Home Department* that somebody may not be deprived of her or his status as an employee just because he or she is a participant in a national Au Pair scheme (InfoCuria, 2008).

The next section of this paper will introduce Irish legislative issues and clearly demonstrate how significant the role of the legal employment status of Au Pairs is.

2.3.2. Ireland

Ireland's domestic labor market was struck by heavy changes in Au Pair employment legislation since the landmark court decision in 2016 that Au Pairs where the labor court ruled that compliance with the International Labor Organization and its Domestic Workers Convention, which Ireland ratified, is means to accept the status of an Au Pair as a domestic worker and nothing less in regards of worker's rights. The Irish Workplace Relations Commission, established in 2015 through Workplace Relations Act 2015, points to a common fallacy that finds its reasons between de facto and de jure conceptions of Au Pairs and states

that “[t]he use of designations such as 'Au Pair' or other descriptions of arrangements between consenting parties do not in themselves mean that a person working in a home is not an employee under Irish law”. (RTE, 2016; Workplace Relations, 2019a; Workplace Relations, 2019b)

2.3.3. U.S.A.

The American Au Pair scheme regulated under a Code of Federal Regulation, more specific *22 CFR § 62.31 - Au pairs*, provides a solid and detailed legislative framework for Au Pairs, their employers, and J-1 sponsor organizations. The law comprises 16 paragraphs that cover a broad variety of themes pertinent to Au Pair employment, they be:

- (a) Introduction
- (b) Program designation
- (c) Program eligibility
- (d) Au pair selection
- (e) Au pair placement
- (f) Au pair orientation
- (g) Au pair training
- (h) Host family selection
- (i) Host family orientation
- (j) Wages and hours
- (k) Educational component
- (l) Monitoring
- (m) Reporting requirements
- (n) Sanctions

(o) Extension of program

(p) Repeat participation

At this point a full citation of the law would be unproportionate. However, I will summarize a selection of relevant key points that shall serve later comparison purposes:

(c) Program Eligibility:

- Max. 1-year Au Pair stay
- Max. 10h childcare per day / Max. 45h childcare per week

(d) Au Pair Selection

- Au Pair min. 18 / max 26 years of age
- Secondary school education
- Proficiency tested in spoken English
- Mandatory Au Pair background check

(g) Au Pair Training

- Prior to placement Au Pair must absolve at least 8 hours of child safety lessons
(4 of them infant related)
- At least 24 hours child development instruction (at least 4 hours devoted to children under the age of 2)

(h) Host Family Selection

- Must be fluent in English
- Must pass background check
- Must prove to have sufficient financial resources

(i) Host Family Orientation

- Families must familiarize themselves with the ethics and moral of exchange visitor program
- Must attend at least one family day conference sponsored by Au Pair organization

(j) Wages and Hours

- Wage according to Fair Labor Standards Act
- Max 45 hours per week
- Max 10 hours per day
- Min 1 ½ days off per week + 1 complete weekend off per month
- 2 weeks of paid vacation

(o) Extension of Program

- Extensions possible for either 6, 9, or even 12 months via special request

(p)

- Repeated participation in Au Pair program possible, if Au Pair has resided for at least 2 years outside US after first participation

2.3.4. Australia

Due to the absence of both a legal definition of Au Pairs and a special scheme dedicated to the regulation of Au Pair employment, Au Pairs in Australia are categorized as working holiday makers and enjoy nearly the same legal status as regular working holiday makers, colloquially called “backpackers”, and are thus obligated to use the visa subclasses 417 (working holiday) or 462 (work and holiday) to conduct their Au Pair stay in Australia (Berg & Meagher, 2018). Hitherto, the working holiday scheme of Australia enables youths from 42 nations between ages 18 and 30/35 (nation-specific) to explore the continent and enter a legal employment relationship entailing paid labor (ibid, 2018).

Yodanis and Lauer (2005) mentioned in a preceding comparative study that also foreign student visas (20 hours/ part-time work permitted) were used to facilitate Au Pair stays. However, the recent study of Berg and Meagher (2018) indicates that the number of Au Pairs working in Australia using a student visa is negligibly low and tends toward 3%. Said study identified a similarly low figure of 2% of Au Pairs working on a tourist visa. This however is illegal and may breach Australian labor and migration laws leading even to deportation as for instance in the case of Josefin Unefäldt (SBS News, 2018).

Confusion about visa, labor, and migratory regulations can be observed in many cases even to date (Berg et al., 2018). Especially the introduction of the so-called backpacker tax in 2017 (15% on up to 37k AUD), which technically applies to Au Pairs as well, has fueled the public discourse whether paid labor of Au Pairs is subject to the new tax law or not (ATO, 2018; Berg et al., 2018).

Due to the blurry lines between employment and cultural exchange it proves difficult to be completely correct when summarizing the key points of Au Pair employment regulations in Australia.

Nevertheless, I want to state some key points which are also reflected in the following comparison table:

- Visa Subclasses 417 or 462 (Working Holiday or Work and Holiday) / No Au Pair Visa

- 42 Nations Included (mostly Europe and North America)
- Max. 6 Months with same Employer (since 2015 Extension up to 12 Months possible)
- Entitlement to National Minimum Wage (at least 280 AUD Pocket Money per Week)
- Income Subject to Backpacker Tax (15% from 0 to 37,000 AUD) (*ATO states it depends on whether the Au Pair – Host Family relationship is employment or cultural exchange)
- Max. 32 to 36h per Week
- No Legally Defined Paid Annual Leave
- No Legally Defined Free Days per Week

2.3.5. Comparison

Figure 4 below presents aggregate secondary data from various sources and illustrates a comparison of the Au Pair employment schemes and legislations under consideration of important key points. The table represents a compilation of aggregate data from several sources providing relevant information on the topic.

	USA	Ireland	Norway	Australia
Special Visa and Au Pair Scheme	YES (Regulated by: 22 CFR § 62.31 / J-1 Visa)	NO (Working Holiday [Non-EEA], Student Visa, Working Permit [EEA])	YES	NO (Working Holiday or Work and Holiday Visa [Subclasses 417, 462])
Maximum Number of Visa Issues	NO	YES (Quotas by Nationality)	NO	Yes (Quotas)
Maximum Stay Duration	12 Months (Repeated Participation Possible)	6 to 24 Months Depending on Nationality	24 Months	12 Months
Eligible Ages	18 - 26	18 - 35 (Varying Age Limits Depending on Nationality) / *USA unlimited	18 - 30	18 - 30
Au Pair Permitted To Have Own Child(ren)	NO	YES	NO	YES
Eligible Nationalities	Almost No Restrictions	Argentina, Australia, Canada, Chile, Hong Kong, Japan, New Zealand, South Korea, Taiwan, USA	Almost No Restrictions (Not Permitted if one Parent is From Au Pair's Home Country)	SUBCLASS 417: Belgium, Canada, Cyprus, Denmark, Estonia, Finland, France, Germany, Hong Kong, Ireland, Italy, Japan, South Korea, Malta, Netherlands, Norway, Sweden, Taiwan, United Kingdom SUBCLASS 462: Argentina, Austria, Chile, China, Czech Republic, Hungary, Indonesia, Israel, Luxembourg, Malaysia, Peru, Poland, Portugal, San Marino, Singapore, Slovakia, Slovenia, Spain, Thailand, Turkey, United States, Uruguay, Vietnam
Salary (minimum)	Weekly Stipend of 195.75\$ (Overruled in 2019 Class-Action Lawsuit: Beltran, et al. v. InterExchange, Inc., et al. 14-cv-03074-CMA-KMT (D. Colo.))	Minimum Wage 9.80€/h (Board and Room Deductible: 54.13€/week)	At Least 5900 NOK Per Month (from April 1, 2019)	Pocket Money Recommended: 280 AUD for up to 36h/week, But No Less Than Minimum Wage (18.29 AUD/h)
Au Pair Remuneration Taxable?	YES (since 2018, 10% on up to 9525\$)	Unclear / Depending on Legal and Visa Status	YES (10% also on corresponding value of board and room)	Greyzone/Disputed (Backpacker Tax since 2017, 15% on up to 37k AUD);
Language Course Payable by Employers	Up to 500\$	NO	YES up to 8850 NOK (from April 1, 2019)	NO
Working Hours	max. 45h/week	max. 30h/week WHM / Regular Employee max. 48h/week	max. 30h/week	32 - 36h/week (not legally binding)
Free Days per Week	1.5 days/week + 1 full weekend per month	2 days/week	min. 1 day/week	Not Legally Specified
Paid Annual Leave	2 Weeks Paid Vacation	2 Weeks Paid Vacation (1 Week for every 6 Months of Work)	25 Days per Year	NO
Employment Status	Au Pair	Questionable: Regular Employee (EU/EEA) / Working Holiday Maker (Non-EU)	Au Pair	Regular Employee / Working Holiday Maker
Previous Child Care Experience Required	200 Hours if Child <2 Years	NO	NO (But: Au Pair Online Course Mandatory for Au Pairs and Host Families)	NO
Background Check for Au Pair Required	YES	NO	NO	NO
Background Check for Host Family Required	YES	NO	NO	NO
Emergency Hotline / Conflict Management Provided by Government	YES (J-1 Visa Holder Labor Exploitation Hotline)	NO	YES	NO
Blacklist for Bad Au Pair Employers	NO	NO	YES	NO
Sponsoring Agency Mandatory	YES	NO	NO	NO

Figure 4: Comparison of Au Pair Employment Regulations in USA, Ireland, Norway, and Australia; Source: secondary data compilation by Author (2019)

2.4. Contemporary Trends and Issues in Au Pair Employment

Much research has been carried out on Au Pairs within the global care chain concept (Basa et al., 2011; Bikova, 2017; A. R. Hochschild, 2000; Isaksen, 2010; Kilkey, 2010; Misra et al., 2006; Schilliger, 2013; Seeberg & Sollund, 2010).

Especially, recent Norwegian and Danish studies, most likely due to homogenic Au Pair market structures, show a tendency of Filipino-centrism (Bikova, 2015, 2017; Dalgas, 2015; Seeberg & Sollund, 2010) that makes direct comparisons to the Australian Au Pair landscape very difficult since Filipinos are excluded from the Working Holiday scheme of Australia.

The definitional inclusion of the impoverished *global south* as a pool for cheap care workers in the *global north* by A. Hochschild (2003); A. R. Hochschild (2000) as well as by Parreñas (2003) degrade the universal validity of a multitude of Euro-centric Au Pair studies that nearly exclusively attempt to integrate Au Pair tourism into said concept. The global south is not the driving supplier of Au Pairs in Australia (Berg & Meagher, 2018) (cf. Figures 5 & 6).

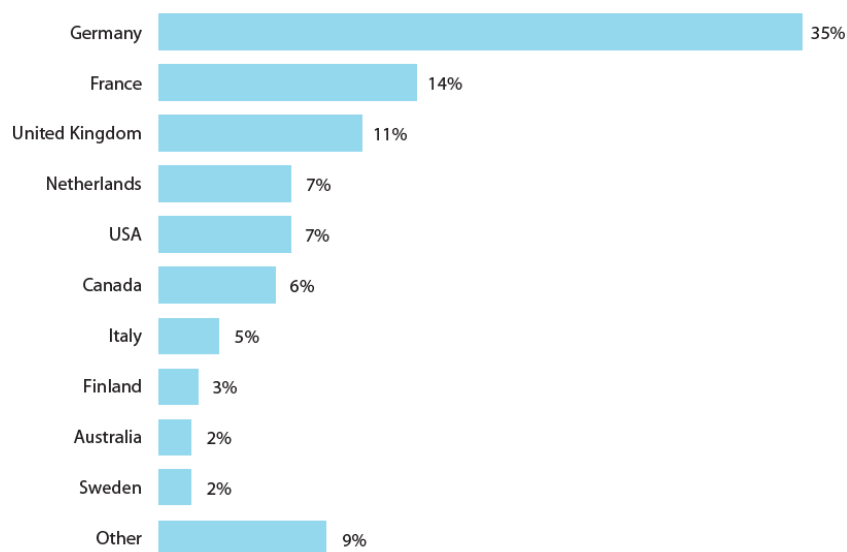


Figure 5: Origin States of Au Pairs in Australia; Berg and Meagher (2018, p. 23)

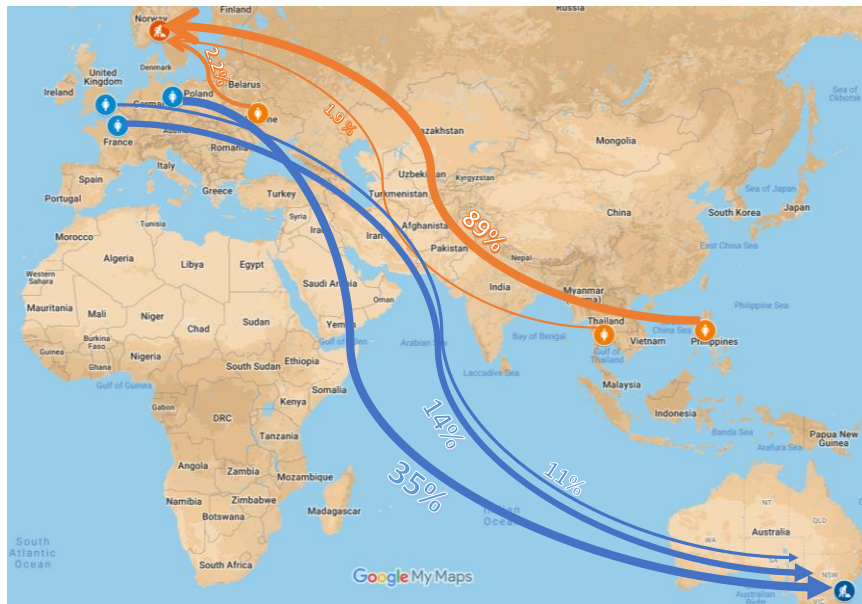


Figure 6 Most Important (Top 3) Au Pair Flows to Norway and Australia 2017; Author (2019); Data Source: Berg et al. (2018); UDI (2017)

2.4.1. Norway

As previously stated, Norway is one of the currently five countries that ratified the European Agreement on Au Pair Placement (ETS68) of 1969. This means that Norway has had an official Au Pair cultural exchange scheme for almost five decades. Nevertheless, Norway transitioned from being a country for outgoing Au Pairs to a major Northern Au Pair destination for incoming Au Pairs in the middle of the first decade of the 21st century (Bikova, 2017).

According to the UDI (2019) the leading ten source countries of Au Pairs in Norway were in 2018, Philippines, Ukraine, Thailand, USA, China, Russia, Indonesia, Brazil, Vietnam, and South Africa (cf. Figure 7)

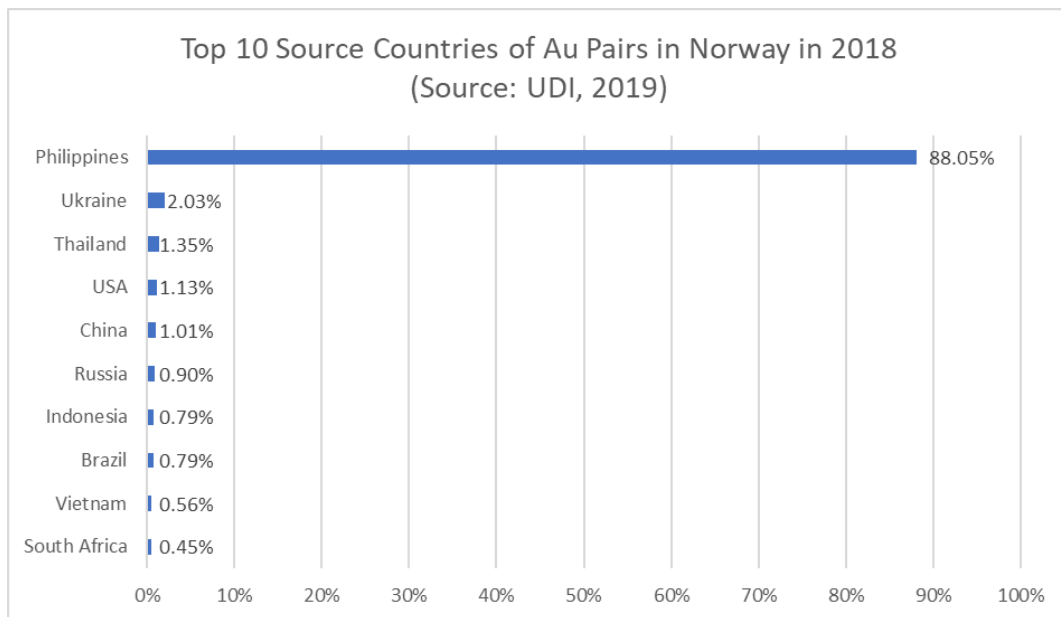


Figure 7: Norway's 10 Leading Source Countries of Au Pairs; Author (2019), UDI (2019)

2.4.1.1. Egalitarian Value Contradictions

Norway is usually imagined as a very progressive, social democratic, and egalitarian state that enforces the Scandinavian model of gender-equality (Bikova, 2017; Cox, 2014). The developments in Au Pair tourism in Norway throughout this decade have caused a homogenous image of Au Pairs in Norway that are predominantly from the Philippines.

Academic scholarship and journalistic investigations have contributed to the popular view that Filipina Au Pairs in Norway “(..) are just another group of exploited migrant domestic workers from the global south” (Cox, 2014, p. 88).

Berg (2015) acknowledged that Norwegians and Australians who consider themselves to be just as egalitarian and progressive hire “Au Pairs” in order to escape the social (postcolonial) stigma of hiring subordinate domestic workers. Other scholars, such as (Bikova, 2008; Cox, 2014); Hess (2009); Hess and Puckhaber (2004), consider the global care chain pertaining to Au Pairs to be revitalizing the formerly existing servant class in many western nations. Sollund (2010, 2011) considers the revitalization of the servant category, which had

once vanished in Norway in the 1950s, according to Sogner (2004), to be quite evident in the case of Filipina Au Pair employment by Norwegian families.

2.4.1.2. *Labor Exploitation*

Labor exploitation, along with other forms of exploitation e.g. sexual, is a recurrent theme in academic scholarship and journalistic analysis Au Pair tourism in many countries (Berg, 2015; Berg & Meagher, 2018; Bikova, 2008; Chuang, 2013; Seeberg & Sollund, 2010; Sollund, 2010, 2011).

Whereas Berg (2015) assumes the relatively stringently selective Australian Working Holiday Program to be an inhibitor to “(...) *the most egregious exploitation of au pairs*” (p.9), Bikova (2008) assumes that within the frame of the less restrictive Norwegian Au Pair scheme allows temporary labor migration driven by economic motives and therefore leads to an increased vulnerability to exploitation of Au Pairs stemming from less economically developed regions of this world, e.g. the Philippines. The subsequent chapter will cover the latter issue in greater detail.

Bikova (2008, 2017); Sollund (2010) consider the increasing numbers of Au Pairs employed and oft-exploited in Scandinavia, especially in Norway, to be an indicator for the reestablishment of the extinct servant class, yet necessary to enable middle-class Scandinavian families to live the two-career family lifestyle. Hochschild (2000; 2003) sees an increased female labor market participation to fuel the growing demand in the developed *Global North* for cheap and often exploited domestic migratory workers from the *Global South*, i.e. Filipinas, Indonesians, Central Americans etc.

2.4.1.3. *Filipina Employment*

Filipino labor migration movements are among the largest and important migration flows all around the globe (Asis & Battistella, 2013).

Løvdal (2012) sees Filipina Au Pair employment in Norway very critically and argues that if countries with such vast income disparities such as the Philippines are continued to be allowed to participate Norway's cultural exchange Au Pair scheme abuse and misappropriation on both employer and employee side are a self-fulfilling prophecy. However, in this decade Norway and its southern neighbor, Denmark, have become highly popular destinations for Filipina Au Pairs (Bikova, 2017; Liversage, Bille, & Jakobsen, 2013; Stenum, 2011).

Since 2008 the share of Filipina Au Pair employment has been quite constant at just little below approx. 90% (Løvdal, 2012). Astoundingly, the Filipino government had imposed a ban in the 1990s that restricted outgoing Au Pair tourism to Europe. Less than a decade ago, in 2010, Filipino Au Pair migration to Norway had been reallocated (Cox, 2014).

This has instigated several socio-political issues, fueled a fierce public debate, and aroused the interest of several researchers.

2.4.2. Australia

2.4.2.1. *Absence of Dedicated Au Pair Scheme / Au Pair Visa*

As postulated before, Australia relies exclusively on its Working Holiday Scheme to facilitate Au Pair stays. Thus, there is no dedicated Au Pair scheme or visa and furthermore no legally binding definition of what an "Au Pair" is. Cox (2012) observed that in the U.K. - which

in 2008 abolished its Au Pair visa and thus also got rid of the legally binding definition of what an Au Pair is - the absence of a legal definition for Au Pairs increases the risk for these vulnerable labor migrants to become exploited.

2.4.2.2. Labor Exploitation

Berg and Meagher (2018) investigated the working conditions of Au Pairs working in Australia in their recent report and found that 33% of all Au Pairs are working under exploitative conditions, which were defined as:

- Receiving less than 280 AUD pocket money per week (board and room already deducted) or 13.50 AUD per hour or less in their first placement (approx. $\frac{3}{4}$ of national minimum wage at time of study)
- Working >45h/week
- <2 days off per week
- Experiencing non-payment of money

Berg et al. (2018) detected via their extensive study on Au Pairs in Australia that about 33% of all Au Pairs experienced exploitative working conditions according to the abovementioned definition. However, the study distinguished four classes of Au Pairs, namely Classic Au Pairs, Classic Au Pairs+, Nanny Housekeepers, and Nanny Housekeepers+. The study, however, did not investigate perceived exploitation as intended in my study whose results are to be found and analyzed in Chapters 4 and 5.

2.4.2.3. Backpacker Tax Introduction 2017

In 2017 the Australian government introduced a colloquially called “backpacker tax” that applies to all working holiday makers regardless of their profession or field of work (ATO, 2018). This implies that host families now have to officially register with the ATO as employers and that they are obligated to withhold 15% tax on the paid wage of their Au Pair. However, it can be observed in forums of the ATO or on Facebook pages of host parent lobby groups that there is confusion about whether Au Pairs are actually to be considered employees and whether their pocket money/wage is taxable.

2.4.2.4. Australian Child Care Crisis

CAPAA’s Position on The Childcare Crisis in Australia

Wendi Aylward, president of the Cultural Au Pair in Australia Association (CAPAA), published a Pilot Visa Program Proposal in mid-2017. I also obtained a more personal and updated stance in a personal interview with Wendi Aylward. The results thereof will be presented in the subsequent chapters.

The report of Aylward which was submitted to the Department of Immigration and Border Protection claims that there is an ongoing childcare crisis in Australia. For instance, just in 2014 more than 55,000 children in Australia were not able to get childcare because of shortages on Australia’s childcare market, which adheres to the non-familialistic model that considers women and men to be equal and both part of the paid workforce. The childcare market is highly competitive and substantially well-developed as in other non-familialistic countries, such as Sweden (Yodanis & Lauer, 2005).

According to Aylward (2017), the Australian childcare system is in crisis due to four substantial weaknesses, they be:

- 1) Childcare shortages in mainly rural and some urbanized regions**
- 2) Families' increasing demand for flexibility cannot be met by traditional childcare solutions**
- 3) Lack of regulation of Au Pair agencies and Au Pair recruitment platforms**
- 4) Restrictions and limitations of the existing Working Holiday and Work and Holiday Visas**

Regarding point 3) Aylward (2017, p. 18), on behalf of the CAPAA, appeals concludingly to the Australian Government:

“We do not believe the inherent opportunities and challenges of this situation can be addressed without the support of the Australian Government. It is time to formalise what has so far been an informal, unregulated industry.”

Aylward (2017) points to the great statistic uncertainty in the current visa system since it is almost impossible to determine the exact number of Au Pairs in the country as the Working Holiday Scheme doesn't regard Au Pairs as a separate category.

Furthermore, the report acknowledges the increasing female workforce participation which according to Aylward (2017), increased from 44% in 1979 to 59% in 2016. Thus, she argues that insufficient childcare provision and shortages lead to part-time working women with children that would have more potential to make a greater contribution to the Australian economy if childcare would be more flexible and more widely available. Therefore, Au Pairs seem to be a good complimentary solution to address this childcare crisis. Statistically, the popularity of the working holiday scheme among the largest source countries has decreased

substantially from 2012 to 2016 e.g. U.K. (15%), Germany (10%), France (19%), USA (16%), et cetera (Aylward, 2017).

Since most Au Pairs in Australia come from the Europe and do not stay the for maximum duration, there is a seasonality problem regarding childcare supply via European Au Pairs. Aylward (2017) proposes that Mexico and Brazil could serve as potential gap source markets.

To avoid exploitation and “horror stories” as described in said report CAPAA advocates an Au Pair Scheme based on Au Pair Organization Sponsorship comparable to the J-1 Cultural Exchange Visa framework described earlier in Chapter 2.3.3.

[Findings and Statistical Description from HILDA Survey of The University of Melbourne](#)

The Melbourne Institute: Applied Economic & Social Research at the Faculty of Business and Economics of the University of Melbourne releases annually the statistical report of the so-called HILDA Survey (The **H**ousehold **I**ncome and **L**abour **D**ynamics in **A**ustralia) (Wilkins & Lass, 2018).

One key finding of the report is that the use of paid childcare is dependent on the employment status of the child’s parents (Wilkins & Lass, 2018, p. 10). This becomes apparent in the statistics in Figures 8 and 9. Figure 8 shows clearly that from 2005 to 2016 there has been a 24.2% increase in paid formal childcare hours used per week among couple parents. The use of nannies or paid sitters has increased not that greatly by only 3.3 percent. The lower income tercile of families showed a 21.6% increase in the use of formal care from 2005 to 2016, but the use of nannies or sitters decreased by more than 55% over the same period. Whether or not this is due to increased formal childcare subsidies or lower disposable incomes

and higher prices for nannies and sitters is questionable. The steepest increases in the use of paid nannies and sitters are accounted for by the middle/upper-middle/and upper class, i.e. the middle tercile saw an increase of 33.9% in the hours of service purchased from nannies or paid sitters; the top tercile increased nanny or paid sitter hours by 17.1%.

	2005 and 2006	2007 and 2008	2009 and 2010	2011 and 2012	2013 and 2014	2015 and 2016	Percentage change over the full period
Weekly hours by parent type and type of care							
<i>Couple parents</i>							
Formal care	17.9	17.5	18.7	18.3	20.6	22.2	24.2
Nanny or paid sitter	0.9	1.4	1.0	1.0	0.6	0.9	3.3
<i>Single parents</i>							
Formal care	21.2	21.3	22.0	20.9	24.0	23.3	10.0
Nanny or paid sitter	0.4	0.2	0.1	0.1	0.3	0.4	-2.1
Weekly hours by tercile (third) of the income distribution and type of care							
<i>Bottom third</i>							
Formal care	15.0	16.7	16.1	15.7	18.1	18.3	21.6
Nanny or paid sitter	0.3	0.5	0.2	0.2	0.1	0.1	-55.9
<i>Middle third</i>							
Formal care	18.0	17.9	20.1	19.4	21.4	22.6	25.2
Nanny or paid sitter	0.5	0.6	0.7	0.5	0.3	0.6	33.9
<i>Top third</i>							
Formal care	21.2	20.8	19.9	20.7	22.8	24.7	16.6
Nanny or paid sitter	1.3	2.4	2.2	1.9	1.3	1.5	17.1

² Child-care costs mainly arise from the types of formal and informal child care analysed in the previous section on child-care usage. However, a minority (around 4%) of parents with child-care costs for children not yet at school report child-care costs incurred by paying relatives, friends or other persons for informal child care. This section of the report includes all types of child-care costs.

Figure 8: Mean weekly hours of paid care per child not yet at school—Families using paid care, 2005 to 2016; Source: Wilkins and Lass (2018, p. 12)

	2002 and 2003	2004 and 2005	2006 and 2007	2008 to 2010	2011 and 2012	2013 and 2014	2015 and 2016	Percentage change 2002/03 to 2015/16	Percentage change 2004/05 to 2015/16
Median weekly expenditure (\$, December 2016 prices)									
Couple-parent family	71	94	127	123	127	147	154	119	64
Single-parent family	44	41	51	69	71	84	102	133	146
Median weekly expenditure per child (\$, December 2016 prices)									
Couple-parent family	—	67*	95	99	97	115	122	—	81
Single-parent family	—	39*	46	60	61	73	81	—	108
Median expenditure per hour of child care (\$, December 2016 prices)									
Couple-parent family	4.6	5.5	6.2	6.6	6.6	6.5	6.3	27	15
Single-parent family	2.3	2.5	3.0	3.3	3.7	3.6	4.1	45	67
Median proportion of household income spent on child care by tercile (third) of the income distribution (%)									
Bottom third	3.8	4.0	5.1	5.2	5.7	6.3	7.9	107	95
Middle third	4.7	5.8	6.0	6.4	6.4	7.0	7.6	59	31
Top third	5.6	5.8	6.9	7.0	6.0	6.9	6.7	19	16

Note: * This number only relates to 2005.

Figure 9: Expenditure on child care for children not yet at school, by family type and income tercile—Families; Source: Wilkins and Lass (2018, p. 13)

Figure 9 presents indicates some issues previously addressed regarding the childcare crisis. For instance, the average expenditure for childcare for non-school-aged children has increased by 64% from 2004 to 2016 for couple-parent families, whereas single-parent families faced a substantial increase in childcare costs of 146% over the same period. The last three rows in Figure 8 express an ever more drastic issue, namely the percentage of household income spent on childcare. Thus, the bottom income tercile spends almost twice as much of their income on childcare comparing 2005 and 2016, whereas the top income percentile spent only 6.7% of their income on childcare compared to 5.6% in 2003.

Wilkins and Lass (2018) conclude interpreting the statistical trends vivid in Figures 8 and 9 that increased child-care costs contribute to the reduction of effective income of especially low-income families. Thus, hiking childcare costs are considered to be a driver for increasing effective income inequality.

2.4.2.5. Peter Dutton Affair

The Peter Dutton Au Pair Affair is the epitome of the cloud of regulatory confusion that pervades the Australian Au Pair migration and employment regulations.

Cox (2018, p. 2) summarizes the Peter Dutton affair shortly as follows:

“The lack of formal recognition of au pairs in Australia has been exposed recently by the scandal of Peter Dutton, ultra-hawkish immigration minister, intervening to grant a tourist visa to an au pair who was clearly going to be working”

The issue that sparked a political and public debate was that two Au Pairs tried to enter and work in the country utilizing a tourist visa, thus breaching clearly the rules of said visa. Nevertheless, Peter Dutton intervened to grant them working visas. What fueled the debate

eventually was the fact that the Au Pairs who were granted visas and who spared from deportation or other punishment were Caucasian and were going to work for a major donor of the Australian Liberal Party (Parkes, 2018).

According to Parkes (2018), the political left considers this to be an example of the racist “Alt-White Immigration Policy”. Whether this critique is valid or not is debatable since Australia has abandoned its “White Australia Policy” already decades ago (White & Tadesse, 2007).

3. Methodology and Methods

The goal of this chapter is to give a holistic overview on the details of the research paradigm pervading this social science research project. My thesis is based on the *pragmatism* (*pragmatic*) research paradigm. Thus, the following sections will elaborate on the fundamental ontology, epistemology, theoretical perspective, methodology, methods, and sources.

3.1. Ontological Foundation

As postulated before, the research is conducted from a *pragmatic* point of view which implicates an ontological belief that reality is continuously debated, renegotiated, and subject to interpretation in the light of its utility in new and unpredictable situations. Regarding this project, I assume there to be no single reality or truth pertaining to the research subject.

3.2. Epistemological Foundation

The prior section already claimed that the applicable ontological belief implies that no single answer to the question “what is reality?” is to be expected. The world exists and sets the limits within individual interpretation is possible.

The epistemological follow-up question “how can I know reality?” can thus only be answered through thoughtful use of methods that practically approach the obtainment of answers to research questions. My research actions and practices thus help with the obtainment of further knowledge.

3.3. Theoretical Perspective

The applied theoretical perspective of this thesis appeals to research through design, i.e. action and engagement in the solution of societal problems.

3.4. Methodology

Feilzer (2010) advocates the use of a mixed-methods approach in research adhering to the principles of pragmatism. Thus, several methods will be applied in the pursuit of obtaining answers to my two initial research questions stated in Chapter 1. However, some of the proposed methods in the interpretative-constructivist research paradigm described in Crotty (1998) overlap with the pragmatic research paradigm, especially qualitative interviews.

3.5. Methods

Since this thesis is based on a mixed-methods approach several methods were used.

The main method concerned with the collection and evaluation of secondary data were a discourse analysis of pertinent academic literature, public and political debates, parliamentary debates, as well as Au Pair vlogs and blogs, and documentaries on the topic of Au Pair tourism or Au Pair employment. Furthermore, I conducted a content analysis of the aforementioned academic literature to identify key issues and themes analyzed by other authors.

Primary data was collected and analyzed initially via Twitter and Google data mining in order to also identify relevant themes and issues of public interest. The backbone of the

primary data collection were first and foremost in-depth semi-structured interviews and written interviews.

3.6. Background of the Study, Positionality, and Choice of Research Methods

This chapter shall give my readers an overview on my positionality as a researcher interested in the specific topic of Au Pair tourism and the background of the study. Furthermore, I will concisely explain and justify my choice of research methods.

As I mentioned at the beginning of this thesis, my personal interest was aroused by multiple personal encounters and observations that could somewhat be classified as ethnographic observations. Several people in my circle of acquaintances and friends, mostly solid German middle-class or upper-middle-class as well as in my extended family made Au Pair experiences mostly in the U.S., Australia, and New Zealand, and Sweden. This circle of acquaintances also contains some Au Pair employers in Norway, Sweden, Australia, and the USA.

After I graduated from high school in Germany, I used to live a while in the self-crowned "*Capital of Scandinavia*", i.e. Stockholm. There I had several interesting encounters and chats with German Au Pairs and East-European Au Pairs at church meetings. I noticed quickly that the turnover rate of Au Pairs in some families seemed quite high and entirely satisfactory Au Pair experiences seemed to be rather the exception than the rule. Furthermore, changing one's host family didn't seem to be a rare thing either.

A friend and graduation classmate of mine went to Australia after high school to do a *typical* working holiday. To my astonishment, she quickly converted her working holiday

adventure into an Australian Au Pair adventure. Thanks to the flexibility of the working holiday visa in Australia such a conversion was and is possible to present day without any obstacles. Whether this is an advantage or disadvantage shall remain uncommented at this point. Despite the statistics more than clearly telling that German youths are the main group of working holiday makers (and Au Pairs! cf. Berg et al. 2018) in Australia, I want to exemplify the commonness of this post-high school activity by telling a short anecdote. Approaching the beginning of summer 2013 and thus during my period of final examinations several people who knew me asked me whether I would go to Australia as a working holidaymaker next. I never mentioned such a thing anywhere. *“Doesn’t everyone go there nowadays?”* was a typical response when I asked how they had even come up with the idea that I would go to Down Under after my graduation. Another three classmates of mine went on working holiday to Australia the same year, one as an Au Pair, and another one as an Au Pair to New Zealand.

Years had passed until I would get into a relationship with an Au Pair girl (she didn’t refer to herself as “Au Pair”) from the Baltics in Stavanger employed by a fairly busy lawyer/politician couple at the beginning of my master studies. Considering her working hours and her substantial pay it rather seemed like full-time employment to me. But of course, I developed interest in the Norwegian Au Pair employment regulation and came across the Norwegian Au Pair scheme. Brief academic literature research would soon yield results that comprised mainly studies that were predominantly dedicated to research on Filipina Au Pairs in Denmark and Norway and associated grievances and issues (see Chapter 2).

My preconception of Au Pairs contained already stereotypes of different motivations for Au Pairing. However and in all honesty, the Filipina-dominated Danish and Norwegian Au Pair markets described in several studies challenged this very preconception of the wanderlust- and cultural adventure-driven white (upper) middle-class girl and the economically challenged

East European girl driven by the desire to raise her socio-economic circumstances and maybe find a husband further West.

I sensed a contrast – laden paradigm (*Cheap Foreign Domestic Employee/Nanny vs. Cultural Exchange Adventure Tourist*) that should shortly thereafter find confirmation in various studies (see Chapter 2) dealing with these issues in present-day Au Pair tourism.

I was fortunate and received the chance to attend advanced research methodology and methods classes for one semester at the University of Wollongong, Australia in 2018. Once there and after briefly browsing academic publications, I noticed that the Australian Au Pair market despite its great popularity had been scarcely dealt with in Academia and was statistically not graspable since no government agencies kept track of Au Pairs which were counted under the same category as regular working holiday makers. Nevertheless, the Australian Au Pair landscape seemed to rather fit said preconception of the Western white (upper) middle-class girl going on a cultural exchange adventure (cf. Berg et al., 2018).

The seemingly unregulated Australian Au Pair landscape lacking an official and legal definition of “Au Pair” unexpectedly seemed to be more authentic and original than Norway’s highly regulated Au Pair landscape, that suddenly appeared to be an exploitative catalyst feeding the global care chain described by Hochschild converting young and hopeful Filipinas into cheap domestic servants and regular customers of Western Union (metaphorically) in Scandinavia (cf. e.g. Haugen (2016))

Since Australia and Norway both are quite egalitarian, highly economically developed, parliamentary monarchies, and popular Au Pair destinations, I sensed an ideal comparison case worthwhile investigating.

In quest for further knowledge on the differences and similarities I seized the opportunity to conduct a pre-study in Australia which allowed me to investigate Au Pair employment practices, talk to Au Pair employers, and interview researchers. Key issues became apparent to me and aroused my further interest. I developed a model on which I based my primary data collection. The findings will be discussed in detail in Chapter 4.

In consultation (in-depth interview) with one researcher at UOW I was recommended the use of a mixed-methods approach that should build predominantly on interviews and discourse analysis to investigate the lived experiences of Au Pairs and key issues related to the domestic care and emotional labor. A seminar at UOW held by an expert in social media network analysis and Twitter data mining and a later chat about my planned research showed me that this was an ideal means of detecting key issues in public discourse. Especially the aftermath of the Peter Dutton Au Pair affair proved to be a globally dominant topic on Twitter and was furthermore reflected in a Google Trends analysis (see Chapters 2 & 4).

A content analysis of academic literature was deemed helpful in order to grasp key issues and concepts involved in Au Pair tourism and employment.

3.7. Secondary Data Collection and Evaluation

3.7.1. Critical Discourse Analysis

Van Dijk (2001, p. 1) provides a well-formulated definition of critical discourse analysis (CDA) and states that it is *“(...) a type of discourse analytical research that primarily studies the way social power abuse, dominance and inequality are enacted, reproduced and resisted by text and talk in the social and political context”*.

Huckin and Miler (1997) define Critical Discourse Analysis (CDA) as “(...) a highly context-sensitive, democratic approach which takes an ethical stance on social issues with the aim of improving society”.

Fairclough and Wodak (2005) provide a set of main features of critical discourse analysis:

1. *CDA addresses social problems*
2. *Power relations are discursive*
3. *Discourse Constitutes Society and Culture*
4. *Discourse does ideological work*
5. *Discourse is historical*
6. *The link between text and society is mediated*
7. *Discourse analysis is interpretative and explanatory*
8. *Discourse is a form of social action.*

Furthermore, Van Dijk (2001) points out that critical or public discourse analysis is usually multidisciplinary in nature and focuses usually on political and social issues rather than fashions and paradigms. Therefore, I deemed CDA to be an ideal method to employ doing research on global care chains and migratory labor which shows large tendencies towards exploitation and articulation of power imbalances. Especially the interpretation of CDA by Huckin et al. (1997) gives a valid reason to employ the method as it aims at improving society.

Thus, the results or rather resulting critical thoughts from my CDA on Au Pair related discourse from secondary sources underly the analytical discussion of the research results in the latter parts of this paper.

3.7.2. Content Analysis

3.7.2.1. *Word Frequency Analysis via NVivo 12 Pro*

Luckily my university provides me with a complimentary license for the Software Tool Package NVivo 12 Pro. I conducted a thematic content analysis analyzing pertinent academic publications on both the Norwegian as well as the Australian Au Pair employment situations. Furthermore, interview transcripts were analyzed via several word frequency queries generating word frequency tree maps and word clouds. Some raw data was exported as Microsoft Excel files so that further analysis and redundancy filtering (unnecessarily meaningless outputs or word repetitions).

Indeed, there are other QDAS (Qualitative Data Analysis Software) packages for qualitative content analysis or thematic content analysis, such as ATLAS or MAXQDA. However, Paulus, Woods, Atkins, and Macklin (2017) did not detect significant disadvantages or advantages in either one that would make any one a superior choice. The majority of qualitative researchers, however, show to prefer slightly NVivo over other QDAS alternatives (Paulus et al., 2017)

There are three main approaches to content analysis, which are 1) lexical analysis (nature and richness of the vocabulary), 2) syntactic (verb tenses and modes), and 3) thematic (themes and frequency) content analysis (Oliveira, Bitencourt, Teixeira, & Santos, 2013). Furthermore, content analysis follows, according to Oliveira et al. (2013), three stages, namely 1) pre-analysis, 2) exploration, and 3) treatment and interpretation.

I chose to analyze abovementioned content via the thematic approach and focused on themes and word frequencies to show and compare general trends and issues in Au Pair tourism and employment in Norway and Australia.

The method is used as an analysis component complimenting the other methods and analyses as recommended by Soltani, Azadegan, Liao, and Phillips (2011) among others advocating mixed-methods qualitative research.

3.8. Primary Data Collection and Evaluation

3.8.1. Ethnographic Observations

As indicated in previous chapters, I am drawing on earlier personal encounters and experiences regarding Au Pair employment and Au Pair tourism in this thesis to complement my primary. Two preceding relationships, one with a German girl who went Au Pairing in New Zealand and one Baltic girl who is to date still Au Pairing in Norway, gave me first-hand info on the lived experiences of Au Pairs in these two cultural regions. Talks to friends who went as Au Pairs to Sweden, Australia, Norway, and the U.S. gave me complementary first-hand information on a range of individual Au Pair experiences. Also, talking to Au Pair employers in my circle of acquaintances gave me insights and opinions from the employer/host family side of Au Pair tourism. Given these observations and personal information, which of course will be anonymized and treated in all confidentiality, for the sake of advancing this field of social research.

3.8.2. Semi-Structured In-Depth Interviews (Online & Offline)

3.8.2.1. Access

In general, I did not face large obstacles in recruiting probands for this study. Social media including Instagram, Facebook, YouTube and others provide good searchability regarding the use of specified keywords. However, as a male researcher I assume that there

is minimal barrier to be overcome when contacting young strangers of the opposite sex. Facebook groups are an ideal resource pool to recruit Au Pairs. Nevertheless, many Facebook groups are not public and exclusively for Au Pairs and/or host families.

In the whole of the Au Pair sampling process I aimed to search and recruit mainly Western Au Pairs and exclude Filipinas or South-East Asian Au Pairs to ensure comparability between the chosen Au Pair groups in Australia and Norway. Especially within the Norwegian context it was difficult to even find Western Au Pairs on the Internet due to the overwhelmingly high share of Filipina Au Pairs. Promisingly Spanish-sounding last names suggested Western heritage but were mostly carried by Filipinas. Also, Filipina Au Pairs sometimes changed their Facebook names to Scandinavian or English sounding names. Likely, because they want to increase their chances to be recruited by host families. This posed a difficulty within the proband filtering process.

The Internet and 4G are mighty technologies to allow spatial flexibility and to reach out globally to people of interest. This was of particular importance to me since it enabled me to stay mobile during the conduction of this thesis, which was written in many places around the world.

3.8.2.2. Sampling and Recruitment

For this study I recruited a broad variety of informants in several different ways. I used the non-probability sampling method as well as the snowball sampling method. Since this study compares two far-apart geographic regions it was necessary to recruit interview partners in both regions.

Two researchers at the University of Wollongong were asked directly for interviews. Another researcher at the University of Technology in Sydney was contacted via an email that contained an interview inquiry.

I contacted several organizations that are involved in Au Pair tourism in either Norway or Australia via Email.

Some Au Pairs were recommended to me by friends or acquaintances of mine. These were usually contacted via Facebook Messenger, Email, or WhatsApp.

I found a few Au Pairs through browsing open Facebook Au Pair groups, YouTube Au Pair Vlogs, Instagram, or WordPress Blogs. These were generally contacted via WhatsApp, Instagram, or Email.

3.8.2.3. Participant Description

Participant #	Age	Sex	Nationality	Profession/Occupation	Au Pairing Location	Au Pairing Time	Date of Interview	Interview Language
1	mid-aged	f	Australia	Professor at University of Wollongong (Social Science)	/	/	Sep 19, 2018	English
2	mid-aged	m	Australia	Professor at University of Wollongong (Geography) / Former Chief Editor of a Tourism Journal	/	/	Sep 20, 2018	English
3	20	f	Germany	University Student of Shipping Management	Telemark & Stavanger (NO)	2016/2017 (11 Months)	Jan 16, 2019	German
4	23	f	Germany	Specialist for System Catering	Perth (AU)	2015 (6 Months)	Jan 16, 2019	German
5	19	f	Denmark	Aspiring Chiropractor (Southern Danish University)	Woodend (AU)	2018/2019 (4 Months)	Jan 23, 2019	English
6	mid-aged	f	Australia	Professor at UTS (Law) / Expert in Australian Au Pair Research	/	/	Feb 7, 2019	English
7	32	f	Russia	Master in Cultural Studies (Puppet Theater)	Stavanger (NO)	2010/2012 (23 Months)	Mar 31, 2019	English
8	24	f	Germany	Aspiring BA in Media and Communication and English	Sydney (AU)	2013 (4 Months)	Apr 2, 2019	English
9	mid-aged	f	Australia	Head of CAPAA (Cultural Au Pair Association Australia)	/	/	Apr 3, 2019	English
10	21	f	Germany	Student of Environmental Technology & Development (EAH, Jena)	Stavanger (NO)	2016/2017 (9 Months)	Apr 4, 2019	English
11	24	f	Germany	Aspiring High School Teacher (Uni Rostock) / AIFS (Au Pair Organization) Representative	Melbourne (AU)	2013 (6 Months)	Apr 4, 2019	German
12	19	f	Germany	Au Pair / Soon to be University Student	Melbourne & South Hedland (AU)	2018/2019 (Planned Duration: 12 Months)	Apr 7, 2019	English
13	37	f	Russia	n/A	Haugesund (NO)	2007/2009 (20 Months)	Apr 9, 2019	English
14	30	f	Ukraine	Operations Manager at Stavanger Forvaltningshuset	Stavanger (NO)	2008/2010 (18 Months)	Apr 9, 2019	English
15	24	f	Germany	University Student - Social Work	Sydney (AU)	2013/2014 (7 Months)	April 14, 2019	English
16	26	f	Brazil	Au Pair	Lier (NO)	2018/2020 (Planned Duration: 24 Months)	April 29, 2019	English

Figure 10: Informant Overview; Source: Author (2019)

My informants can be categorized in four main groups, they be:

- Researchers
- Au Pair Organization Representatives
- Au Pairs in Australia

- Au Pairs in Norway

(cf. Figure 10)

In the *Researcher* category were three professors who are employed at two different universities located in New South Wales, namely the University of Technology in Sydney and the University of Wollongong. One researcher is renowned for her current research and specialization in Au Pair tourism legalities in Australia.

In the Au Pair Organization Representative category were two informants, one chief of a major Au Pair organization in Australia (CAPAA) and one regular representative of a full-service Au Pair and cultural exchange organization (AIFS).

I also interviewed a total of six former and current Au Pairs that worked or are currently working in Australia. All informants were female and between 19 to 24 years of age.

Furthermore, five former Au Pairs in Norway were interviewed. All were female and their age ranged between 20 and 37.

3.8.2.4. *Interview Routine*

The interviews were predominantly conducted via the use of Skype, Facebook Call, Email, but also face-to-face. A valuable tip from Prof Waitt of UOW was to ask participants to take a personal object, gift, or picture from their Au Pair time to talk about. In some cases, this

proved to be a valuable method to obtain information on the lived experiences and corresponding memories of Au Pairs.

3.8.2.5. *Interview Themes*

The interviews were conducted in several ways including written, face-to-face, and phone interviews. Different interview guides were designed custom-tailored to each specific stakeholder group. This includes for instances: Au Pairs in Australia, Au Pairs in Norway, Au Pair Organizations, Au Pair Researchers, Tourism and Social Science Researchers. These Interview guides are enclosed in the Appendix under 8.3., 8.4., 8.5., and 8.6..

The centerpiece of my study was interviews with Au Pairs. The interview guides were designed in three tiers, namely *Background Information Questions*, *Preference Elicitation Questions*, and *Solution Design Stage Questions*. Since some German Au Pairs preferred to conduct the interviews in German, I translated both the Norwegian context interview guide as well as the Australian interview guide into German to fulfil this specific request.

3.8.3. Twitter Data Analysis

Since I recognized during my pre-study that the Au Pair topic is not only relevant to young working holiday makers but also very relevant to the migration and work politics in Australia especially ever since the Peter Dutton Au Pair Affair ("*Visagate*") (cf. Chapter 2). Therefore, I decided to conduct a simplified Twitter sentiment analysis to investigate the public discourse on the popular social media and micro-blogging platform.

Meduru, Mahimkar, Subramanian, Padiya, and Gunjgur (2017) have concluded that the latter-mentioned microblogging services, such as Twitter, have become extraordinarily large resource pools for opinion and sentiment data on many subjects. An ever-increasing number of people uses these services to express their sentiments about topical affairs (Singhal, Agrawal, & Mittal, 2015).

Elghazaly, Mahmoud, and Hefny (2016, p. 1) state that *“using social media for political discourse is becoming common practice, especially around election time”*. Since Australia’s federal elections were recently held on the 18th of May 2019 conducting a twitter sentiment analysis regarding the Au Pair employment and Au Pair tourism seemed to be a feasible and proper method to determine the relevance of the topic within the frame of the public discourse.

Since Twitter meta-data is expensive to acquire and my time and monetary resources were limited the twitter data analysis was conducted sporadically covering a time frame from Late December 2018 to Mid-April 2019.

The free version of SOCIOVIZ was utilized to obtain four datasets of Twitter data.

The following times were covered in the analysis:

- late December 2018 / early January 2019
- mid-January 2019
- late March 2019 / early April 2019
- mid-April 2019

As can be seen above, the time covers the pre-election time in Australia.

The search query was: “aupair”. The language domain searched was set to English (“en”).

Due to the small quantity of data obtained the data was interpreted manually and only utilized to derive a simple sentiment and relevance trend for the Au Pair issue according to the leading discussion topics, respectively top-ranking hashtags. It must be emphasized that apart from the English language filter there was no regional search limitation. Therefore, the results could be interpreted as almost global.

3.9. Ethical Considerations

3.9.1. Informed Consent

All my informants were informed about the purpose and the frame of this study. They were informed either verbally or in written form before each interview about the anonymized use of the information that they would share with me. Furthermore, all informants were given the opportunity to revoke their consent at any time before the publishing of this thesis. All participants mentioned in this thesis consented to said use.

3.9.2. Researcher – Participant Power Relations

Apart from one Australian university researcher, all my informants for this study were of the opposite sex and many of my female Au Pair interviewees were younger than me. Of course, I took this cautiously into consideration and tried to avoid intimidating or irrelevantly personal questions that would not contribute to the answering of my research questions to keep researcher – participant power relations balanced. Nevertheless, the researcher – participant power relations were in most cases balanced anyway due to the physical distance when conducting interviews via phone, Skype, or Email.

3.9.3. Responsible Data Processing

All interview data was stored exclusively on my own media devices and back-ups were stored on password encrypted cloud services that comply with the European Data Protection Regulation (GDPR).

3.10. Conclusion

This chapter elaborated on the methodology and methods employed to conduct this research. This entailed explaining the ontological and epistemological foundations, theoretical perspectives as well as background of the study including the author's positionality. Every employed research method was illuminated including primary and secondary data collection and evaluation methods ranging from discourse analysis, semi-structured interviews, content analysis, ethnographic observations, to even Twitter data sentiment analysis. Furthermore, ethical considerations were presented in order to justify this research project from the standpoint of academic integrity and ethical compliance.

4. Results and Analysis

4.1. Twitter Data Analysis

As can be seen in the figures below Australia played a tremendously important role in the public discourse on Twitter regarding the hashtag “aupair”.

The Australia related hashtags which were among the top ten aupair-related hashtags were:

#auspol

#peterdutton

#australia

#immigration (likely related to Dutton affair)

#dumpdutton

#dutton

#vote

#gapyear (likely)

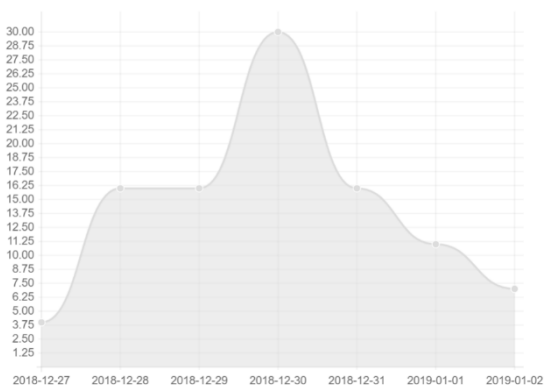
#christmasisland

On three out of four checked occasions (except for late March/early April) Australian politics and related hashtags dominated the English public discourse on Twitter regarding the topic “aupair”. Noteworthy, there were three hashtags referring to the politician Peter Dutton. (cf. Figures 11, 12, 13, 14)

It is hardly disputable, considering the presented findings, that Au Pair employment and temporary migration are playing a very important role in Australia and have until recently

dominated the global public discourse. This provides a profound justification to use Australia as an exemplary case for the importance of well-designed Au Pair employment schemes or temporary worker migration and employment regulations. The general sentiment regarding the abovementioned hashtag seems to be politically motivated and rather on the negative than the positive side.

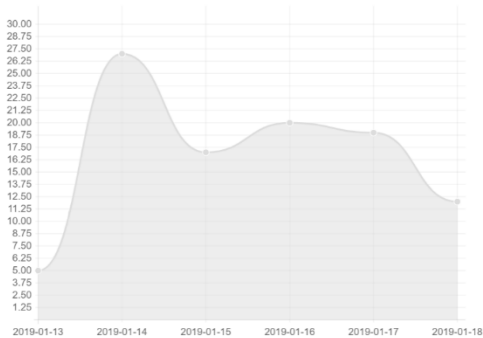
Late December 2018 / Early January 2019



Top hashtags (frequency)	
#aupair	31
#auspol	24
#passion	10
#travel	6
#peterdutton	6
#australia	4
#inp	4
#amazonbestseller	3
#loire	3
#amwriting	3

Figure 11: Twitter Data Analysis Late December 2018 / Early January 2019; Author (2019)

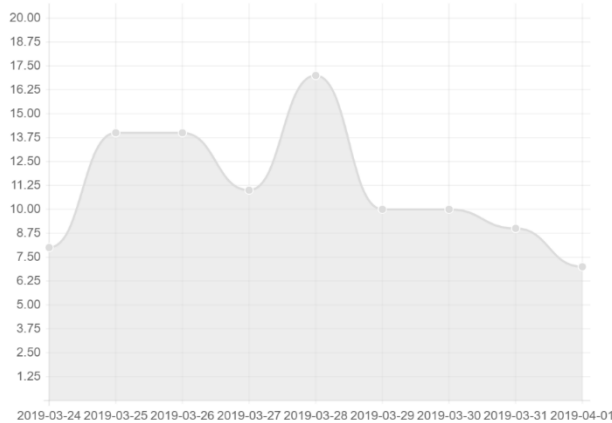
Mid-January 2019



Top hashtags (frequency)	
#aupair	20
#oddp	6
#immigration	6
#dumpdutton	6
#nanny	4
#australia	2
#childcare	2
#childcarer	2
#eyfs	2
#preschool	2

Figure 12: Twitter Data Analysis Mid-January 2019; Author (2019)

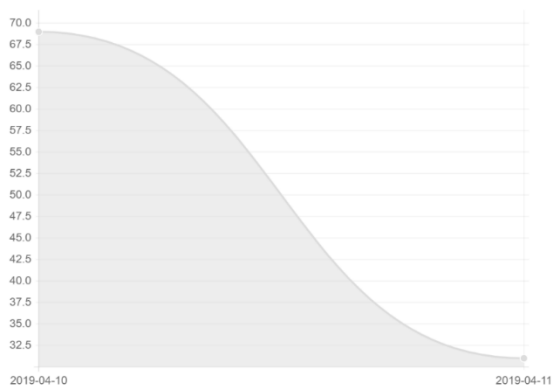
Late March / Early April 2019



Top hashtags (frequency)	
#aupair	17
#france	7
#aupairing	4
#usa	4
#nyc	4
#aupairs	3
#americandream	3
#newyorkcity	3
#newyork	3
#hostfamilies	2

Figure 13: Twitter Data Analysis Late March / Early April 2019; Author (2019)

Mid-April 2019



Top hashtags (frequency)	
#aupair	26
#auspol	12
#dutton	4
#vote	3
#paladinaffair	3
#paladin	3
#gapyear	2
#chineseinfluence	2
#xiangmo	2
#christmasisland	2

Figure 14: Twitter Data Analysis Mid-April 2019; Author (2019)

4.2. Content Analysis

This subchapter will present the results from a content analysis using the word frequency analysis function of NVivo v12. My settings in NVivo 12 for the Word Frequency Query looked as follows:

Display Words: 13 Most Frequent

Minimum Length: 6 Letters

Grouping: "With Synonyms"

The settings were applied to both queries, i.e. 9 Pertinent Academic Publications on the Australian Au Pair Market as well as 9 Pertinent Academic Publications on the Norwegian Au Pair Market; all were created throughout the last two decades. The bar graphs underneath each word cloud were generated using Microsoft Excel taking the analysis summary data (.xlsx export) from NVivo. The results were filtered according to redundancy afterwards, e.g. "Norway" and "Norwegian" were reduced to only "Norway" to reduce unnecessarily meaningless repetitions.

Thereafter, a similar word frequency analysis was applied to all Au Pair interview transcripts, i.e. 6 Au Pairs in Australia and 6 Au Pairs in Norway. The settings in NVivo were slightly different, namely:

Display Words: 12 Most Frequent

Minimum Length: 6 Letters

Grouping: "With Synonyms"

The filter process to reduce redundancy and meaningless repetitions was applied analogously to the analysis of the academic publications.

4.2.1. Norwegian Context

Content Analysis of Academic Publications

Unsurprisingly, migration has been a frequently addressed topic and sticks out in the Norwegian literature sample word cloud (cf. Figure 15). Three East European Au Pairs contacted of whom two agreed to an interview (cf. Chapter 4.5.2.) have migrated permanently to Norway after their Au Pair time was over. Furthermore, the word cloud visualizes very well that family is a key concept involved in Au Pair employment since host families are in most cases also employers from a legal viewpoint.



Figure 15: Word Cloud from Word Frequency Analysis of 9 Relevant Academic Publications on the Norwegian Au Pair Market; Author (2019)

Figure 17 shows the filtered results from the analysis of which indicate that work or working has a higher quantitative importance than “cultural” or “exchange” which points to a previously outlined problem in Norway, namely the pretense of cultural exchange and the persistence of global care chain and exploitative care and domestic labor relationships between the global south and the rich north.

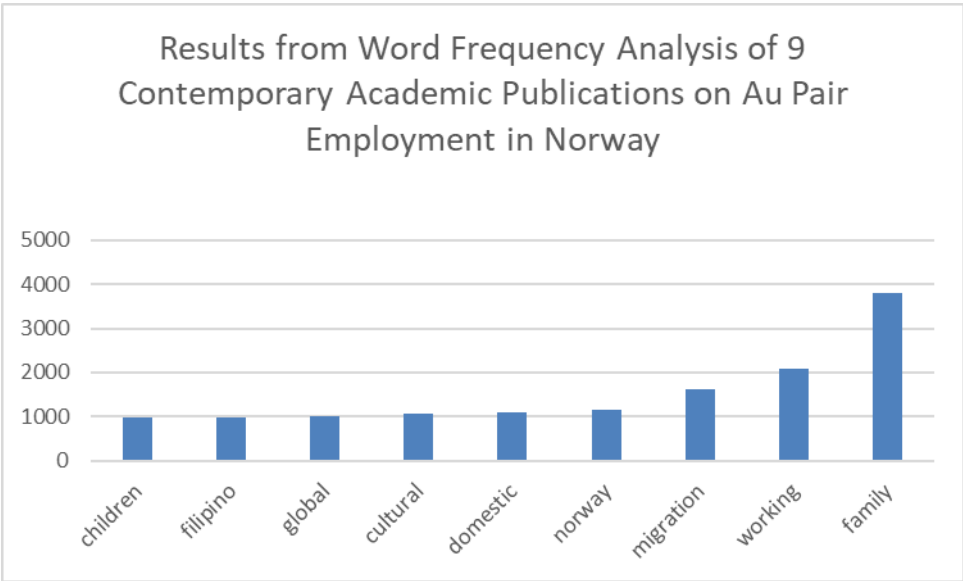


Figure 16: Results from Word Frequency Analysis of Academic Publications on Norwegian Au Pair Employment; Author (2019)

Content Analysis of Interview Results

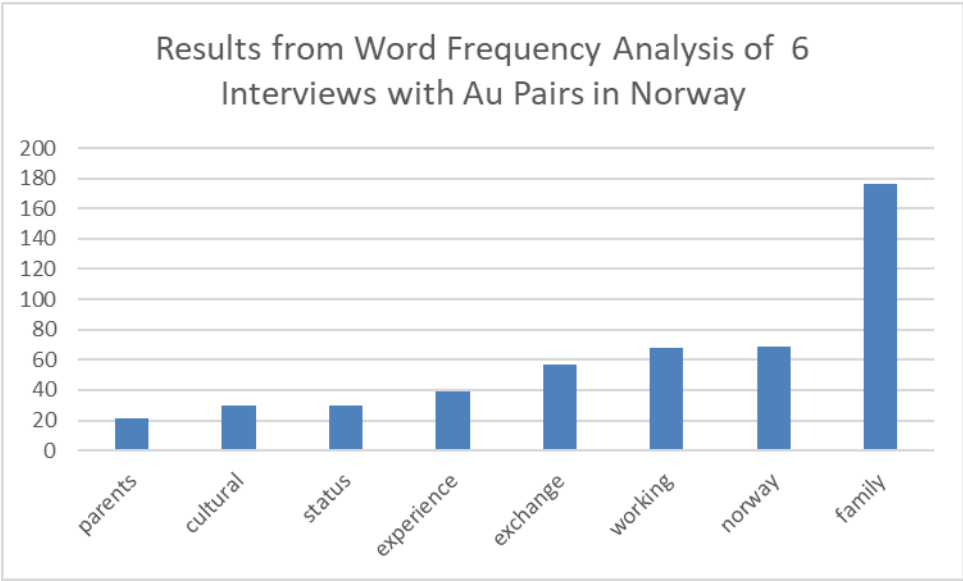


Figure 17: Results from Word Frequency Analysis of Interviews with Au Pairs in Norway; Author (2019)

The interview results yielded quite different results in the content analysis (cf. Figure 16). Figure 16 shows clearly that working and related terms such as “work” etc. were after “family” and “Norway” the third most frequent words uttered by the Au Pairs. The cultural (exchange) component also seemed to have a slightly lower importance following less frequent use. The fact that “status”, most likely related to socio-economic status or worker/non-worker status was, indicates that said statuses are significant and that there might be issues regarding either the worker/non-worker status or socio-economic status differences.

4.2.2. Australian Context

Content Analysis of Academic Publications

Figure 18, a word cloud showing the most frequently used words in 9 pertinent academic publications on the Australian Au Pair market show that just as in the Norwegian example the word “family” sits in the center. However, “working” seems to play a slightly larger role than in the Norwegian context. This could correspond to the anyway significantly higher average of working hours of Au Pairs in Australia compared to the approximately 30 weekly hours in Norway.

The bar graph in Figure 19 expresses the same content yet may seem a little bit clearer and graspable at first sight.



Figure 19: Word Cloud from Word Frequency Analysis of 9 Relevant Academic Publications on the Australian Au Pair Market; Author (2019)

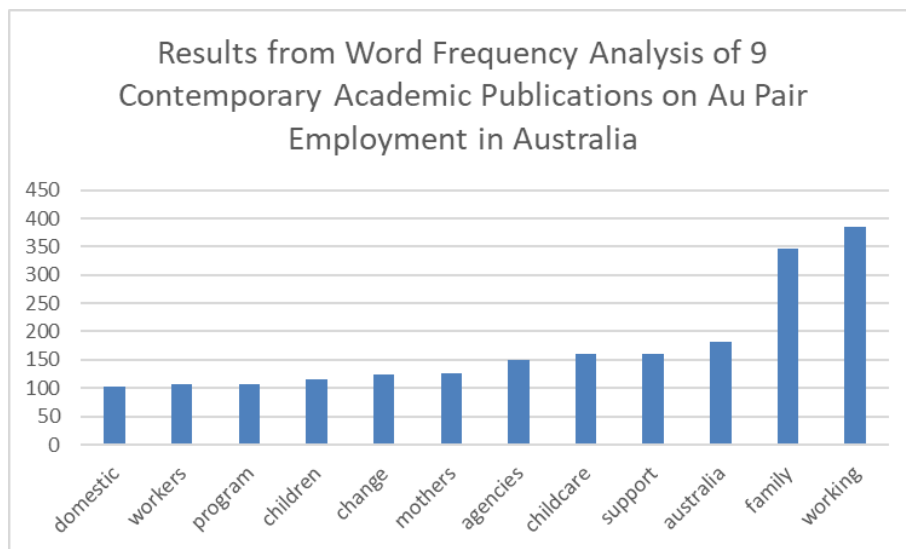


Figure 18: Results from Word Frequency Analysis of Academic Publications on Australian Au Pair Employment; Author (2019)

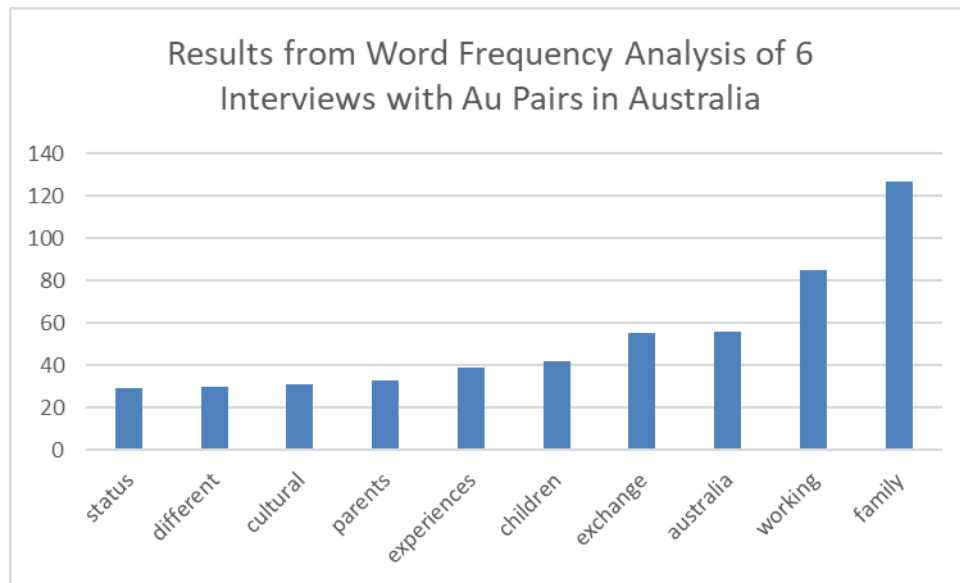


Figure 20: Results from Word Frequency Analysis of Interviews with Au Pairs in Australia; Author (2019)

The bar graph in Figure 20 shows the exact opposite priorities in the leading two mentioned words. Academic publications mention “working” most frequently in the context of Au Pairs whereas Au Pairs themselves seem to lay priority on “family” and make “working” a secondary priority.

4.3. Interviews

4.3.1. Stances of Researchers and Organizations in the Australian Context

4.3.1.1. *Interview with the President of Cultural Au Pair Association of Australia (CAPAA)*

When asking about the motivations for Au Pairs in Australia and the importance of socio-economic status differences between Au Pairs and host families, the president of the *Cultural Au Pair Association of Australia “CAPAA”*, established in 2012, gave me the following answer:

“Not in Australia. Most au pairs are from largely wealthy countries and are not participating on the program for financial reasons. While not negating the need for au pairs to be fairly compensated, most au pairs primarily become an au pair for the experience with the financial considerations being secondary.”

Since the *global care chain* issue has been addressed by many scholars in Europe and America with regard to Au Pair employment the assumption that socio-economic differences between Au Pair origin countries and host countries was confirmed by the president of the CAPAA who responded that she has never heard of the phrase *global care chain* before and added that the motivation of Au Pairs in Australia who usually stem from Western Europe is to participate *“(…) on an au pair program in order to experience life with Australian family, experience our lifestyle and improve their English (i.e. German, French, Italian au pairs). They normally do the program as a gap year so are fairly young (18, 19) and choose au pairing as a more secure, well supported option where accommodation, work and structured support is provided.”*

One large issue in Australian Au Pairing is the vastly unregulated nature of the market. The CAPAA argues that since there is limited government regulation it becomes difficult for host families to figure out how Au Pairing in Australia works and therefore *“those families that choose to recruit au pairs through au pair search platforms (rather than a reputable agency) can set their own standards and are answerable to no agency or other authority”*.

The CAPAA states that employing an Au Pair as a childcare provider does usually not mean saving money for the families as *“(…) childcare is funded and au pair placements are not, there is normally not a huge cost saving after food, board and other costs are included.”*

Furthermore, the CAPAA expresses concerns about the current award model for Au Pairs that does broadly ignore in-kind payments including board and room as well as other things such as gym memberships et cetera.

Regarding the inflexible Au Pair award structure in Australia, the president uttered the following concern:

“If an au pair is deemed to be an employee under the miscellaneous award then occupational health and safety requirements, meals breaks etc. make a placement under this award unworkable for many families. We cannot change the framework so some exemptions would be needed.”

The CAPAA advocates for the introduction of a dedicated Au Pair scheme and visa in Australia that should borrow components from the American J-1 Cultural Exchange Visa Program that should likewise build on mandatory Au Pair organization sponsorship so that *“Au Pairs who participate on the visa are recruited through vetted agencies who are required to deliver a program that adheres to government requirements”*.

The CAPAA also promotes an Au Pairing program that would exempt Au Pairs from the Backpacker Tax or any other income tax. A further argument against the classification of host parents as employers is that *“the additional work involved for families if they become employers and the fear that they may not adhere (by no fault of their own) to one part of it will deter many families from continuing with au pairing”*.

I was informed that it proves to be difficult attaining bipartisan support for a change in legislation *“as au pairs cut across childcare and immigration, we believe it is seen as too difficult by some in government”*.

A further obstacle in attempting to legally formalize Au Pairing in Australia may be since *“Au Pair is still a relatively new concept in Australia (...)”*

Lastly, I was informed that the CAPAA advocates for a cultural exchange scheme that ensures that *“core duties of au pairs [...] remain to be caring for the children”* whereas *“a reputable agency makes it a requirement that household duties are primarily related to the care of the children”*.

4.3.1.2. Interview with Professor Laurie Berg of UTS

Contrary to the CAPAA that deems the Australian Au Pairing system to be too inflexible, Laurie Berg argued that *“(...) it is possible that Au Pairs choose Australia because it offers more flexibility opposed to places that only provide an Au Pair Visa”*

Just like the president of the CAPAA, Professor Berg said that the recent study by her and colleagues showed that Au Pairs come to Australia motivated by the cultural exchange aspect and that *“(...) the primary reasons why they came to Australia were that they wanted*

to learn about Australia and wanted to experience life in Australia, foreign life, and not work in childcare specifically”.

Laurie Berg argues that the increasing demand for Au Pairs in Australia is driven by the ongoing childcare crisis. However, she clarifies that *“(...) the childcare crisis is not a justification for the many hours Au Pairs are working”.*

Furthermore, and in contrast to the position of the CAPAA, Professor Berg argues that Au Pairs should be considered domestic workers. Her stance is that *“(...) Au Pairs are workers like any other worker. For instance, if you work in a café or hospitality, in theory you should be paying the backpacker tax”*

She points out the currently existing legal gray zone regarding backpacker tax law adherence in Australia and says that *“in practice many probably aren’t. It’s a lot cash in hand now. You know, Au Pairs... I think it needs to be regulated in the same way.”*

Professor Berg rejects the subsidization of in-home childcare in the form of Au Pairs and comments on the likely to be decreasing affordability of Au Pairs going along with applicable minimum wages and income tax that *“(...) what we see here in Australia is that Au Pairs are working a lot. I mean I think the average of amount of work was 32 hours, which is a huge amount of work to pay for with minimum wage. And I don’t know if most families really require so many hours of childcare in addition to formal daycare, preschool and so on. I don’t think it would be as unaffordable as families fear, if they’re weren’t also benefiting from a lot of hours that they are claiming that, you know, frankly, could be doing themselves”.*

With concern, and in contrast to CAPAA’s stance, for middle-class families she added that *“(...) it would be affordable for families to pay formally minimum wage and it would*

affordable for middle-class families if they wouldn't use their Au Pairs for such a large number of hours of housework".

Professor Berg rejects the idea of a visa scheme based on mandatory Au Pair organization sponsorship and advocates for an Au Pair scheme that would deny certain nationalities participation in the scheme as it is currently practiced with the visa subclasses 417 and 462. With regard to potential global care chain phenomena Berg argues that *"there is a great deal of exploitation among working holiday makers in Australia. One of the only reasons why it's not worse is that it is only restricted to by in large countries to which nationals can return and can have some sort of safeness. [...] They are typically from families that can support them. They are not relying on remittances that much. [...] But I think the answer is that it should be open with maximum diversity and as little discrimination as possible. But there really need to be stronger safeguards to guard against exploitation"*.

4.3.2. Au Pairs in Australia

My study participants who were or currently are working as Au Pairs in Australia came exclusively from Northern Europe and Western Europe, namely one Danish Au Pair and five German Au Pairs. My sample is thus somewhat representative as it is consistent with the statistic provided by Berg and Meagher (2018) showing that Au Pairs from these regions prevail the Australian Au Pair market.

All Au Pairs had used the Working Holiday Visa (Subclass 417) to enter Australia and conduct their Au Pair stays there. One German Au Pair was a converted working holiday maker whereas the decision to work as an Au Pair was made while already in Australia.

The Australian working holiday scheme application system was perceived as easy to handle and unbureaucratic by all interview candidates. Nevertheless, 50% (3 out of 6) of the Au Pairs reported they had wished for a special Au Pair visa subclass that would enable them to later apply for a working holiday visa since they considered Au Pairing and the working holiday scheme to be two separate activities. The remaining half of the Au Pairs supported the working holiday scheme and its existing visa subclasses in its current form.

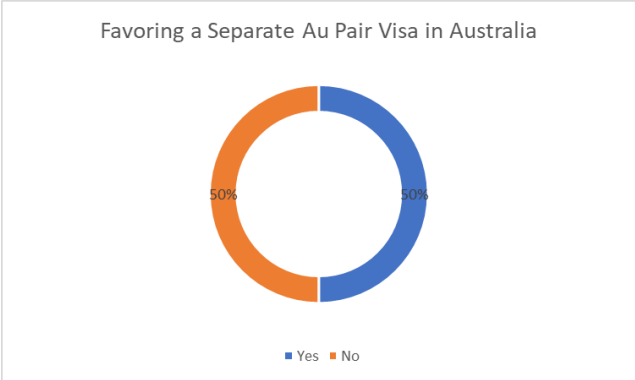


Figure 21: Au Pairs' Attitudes Towards a Dedicate Au Pair Scheme in Australia; Author (2019)

The majority, that is 4 out of 6 Au Pairs, reported that they had used an Au Pair agency to find their host families and organize their Au Pair stay in Australia. The agencies mentioned were major and renowned platforms *aupairworld.com* and *AIFS*. One Au Pair became a representative in the latter organization. One German Au Pair went to the family of a former Australian exchange student that was hosted by her family in Germany.

In response to the question what being an Au Pair in Australia entails 4 out of 6 Au Pairs gave the answer that Au Pairing is a combination of childminding and a cultural exchange program. Two Au Pairs mentioned the combination of *care work* and cultural exchange.

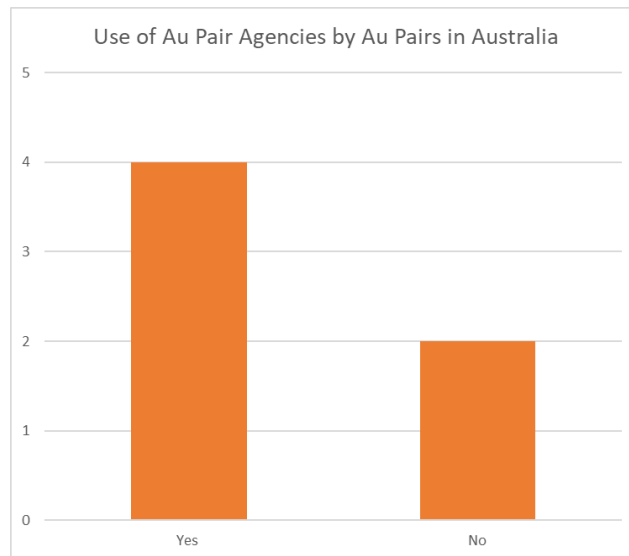


Figure 22: Distribution of Use of Au Pair Agencies in Australia; Author (2019)

When asked how they would personally define the word “Au Pair”, 3 out of 6 Au Pairs defined being an Au Pair in Australia as living in a host family and minding the host parents’ children in exchange for board and lodging. Terms such as “In-House Nanny” or “Professional Bigger Sister” were used to describe this occupation. The definitions of two further Au Pairs were fairly similar yet included carrying out domestic work (chores) as well. One Au Pair defined the term drastically to be synonymous with “cheap employee”.

66% of the respondents classified Au Pairs as workers or employees. 37% said that Au Pairs are not regular employees or workers. For instance, one of the interviewees negating the worker status of Au Pairs argued that you cannot classify Au Pairs as regular workers because “(...) the actual salary is so low that it would be hard for the au pair to make a decent amount of money and the host families would, in many cases, be unable to pay the needed amount of money to the au pair if regular taxes applied.”

When I asked the Au Pairs whether they ever felt exploited during their Au Pair stay in Australia two thirds responded that they never felt exploited by their host families. The Danish Au Pair said that she felt initially exploited by having to work more hours than contractually

agreed on but later solved the misunderstanding via communication and negotiation. More interestingly, one German Au Pair when claiming that she felt exploited explained to me that it was not the host family but the overpriced Au Pair organization that she perceived as exploiting her financially. Thus, one third felt exploited, which is identical to the results in Berg et al.'s (2018) report. However, according to Berg et al.'s (2018) definition for exploitative working conditions I concluded that 83 percent of my interview partners had actually worked under exploitative working conditions, i.e. more than 45 hours per week or for less than AUD 13.50 per hour (p.46).

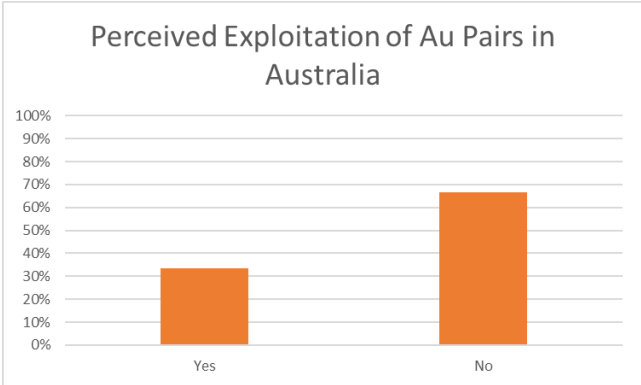


Figure 23: Perceived Exploitation of Au Pairs in Australia; Author (2019)

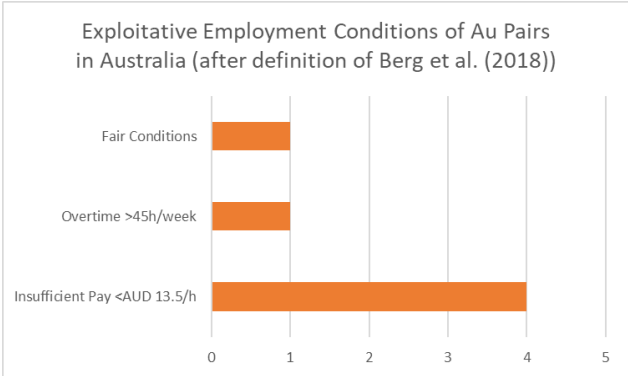


Figure 24: Exploitative Working Conditions of Au Pairs in Australia after Berg et al.'s (2018) Definition; Author (2019)

Nevertheless, the majority of the Au Pairs were greatly satisfied with their host families and thus only two of my interview candidates stated that they considered and actually changed their host family.

50% of all Au Pairs considered the remuneration for their labor to be *pocket money*. This remuneration received by all Au Pairs ranged from AUD 180 to AUD 305 per week, thus equaling an average of 227 Australian Dollars per week.

Noteworthy, none of the Au Pairs stated that they had paid any tax on their income generated through Au Pair work in Australia. This includes four Au Pairs who worked in Australia before the introduction (pre-2017) of the applicable *Backpacker Tax* and two Au Pairs who worked in Australia after 2017. One Au Pair argued, for instance, that “(...) since the rules are yet a tad unclear, I did not have to pay taxes since my salary was perceived as ‘pocket money’ (...)”.

The interviewed Au Pairs worked 40.9 hours per week on average, whereas working hours ranged from 26 hours per week to 55 hours per week. Working more than 48 hours per week is somewhat in the legal gray zone as there are no legally binding maximum working hours for Au Pairs in Australia. However, Berg et al. (2018) considered working for more than 45 hours per week as being “*exploitative working conditions*” (p.46).

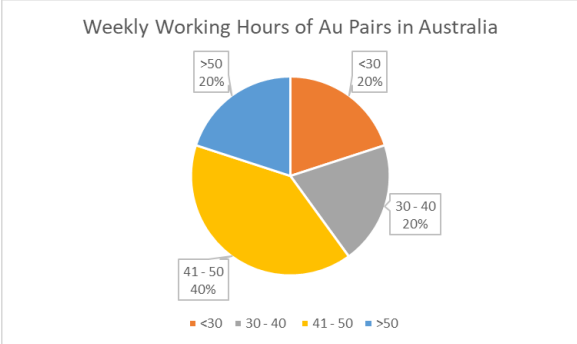


Figure 25: Weekly Working Hour Distribution Among Au Pairs in Australia; Author (2019)

Regarding the socio-economic statuses of the Au Pairs and their respective host families most Au Pairs (4 out of 6) stated that they were to be assigned to the upper-middle-class and thus either equal or just slightly below the socio-economic status of their host families who were always upper-middle-class. Two Au Pairs stemmed from the regular middle-class and were also employed by upper-middle-class Australian families.

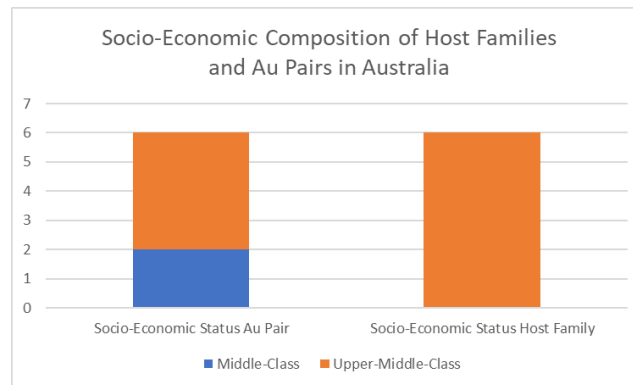


Figure 26: Socio-Economic Composition of Host Families and Au Pairs in Australia; Author (2019)

All Au Pairs considered their host parents to be host parents, whereas one added that they would also be employers to a certain minimal extent.

Regarding communication in and with the members of the host family all Au Pairs reported that they spoke exclusively English at home, while one Au Pair added that German was spoken occasionally with one half-German host parent.

A substantial number of 50% of my probands answered the question of whether they would consider hiring an Au Pair themselves at some point in the future with a definite “NO”. The reasons given were usually the high Au Pair turnover rates and the self-accredited competency of the interrogated girls to cope with raising one’s own child by oneself without the aid of several foreign girls.

Regarding said issue one German Au Pair stated for instance: *“No, I wouldn’t hire an Au Pair. In my opinion, the German kindergarten is a very good place for children to socialize.”*. Another Au Pair from Germany expressed her rejection of the idea to hire an Au Pair in the future because she *“(…) [doesn’t] want 20 or more different people be involved in raising [her] kids, especially since every person only stays for a short amount of time”*. The Danish Au Pair backed her stance on not wanting to hire an Au Pair herself someday by stating that *“(..) you have to trust the person you let in very much as well as accept a lack of privacy since they now live with you.”*.

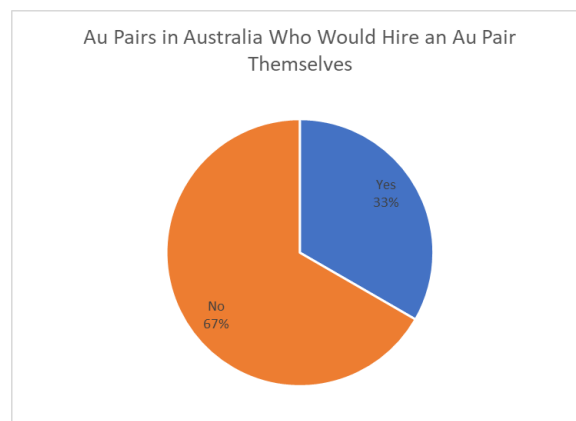


Figure 27: Willingness of Au Pairs to Hire An Au Pair Themselves; Author (2019)

None of the Au Pairs when asked to assign a monetary value to the overall cultural exchange experience were able to respond in concrete figures but rather gave answers like *“the experience is priceless”*.

However, the Au Pairs usually gave an insight on the perceived intangible value of their Au Pair stay in Australia and mentioned the following things in order of frequency (from most to least frequent, cf. Tree Map in Figure 28):

- 1) Independence (23%)
- 2) Appreciation for Parents’ Work (15%)
- 3) Childcare/Childminding Experience (15%)

- 4) Living Abroad (15%)
- 5) Travel Experiences (8%)
- 6) New Friends (8%)
- 7) Skills to Start an Own Family (8%)

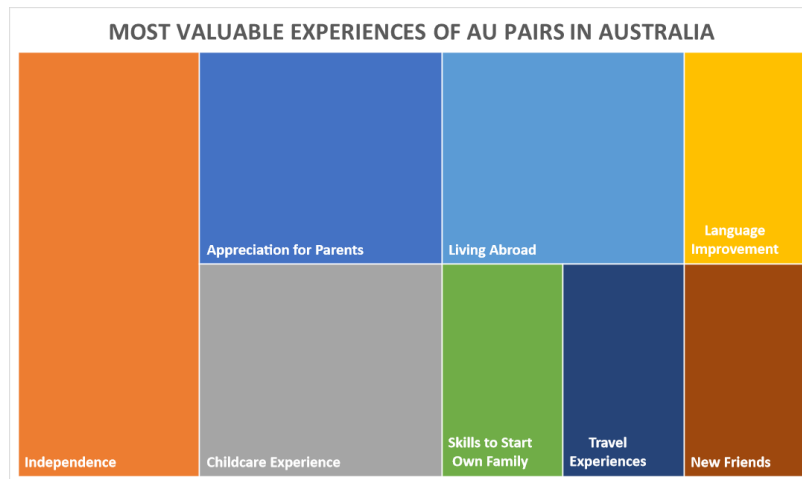


Figure 28: Tree Map Showing Most Valuable Experiences of Au Pairs in Australia; Author (2019)

When asked what could be improved regarding the Australian Au Pair system, half of the Au Pairs suggested a higher pay, one quarter suggested clearer working regulations and employment guidelines provided by official bodies such as the state. One Au Pair mentioned that the Working With Children Check which is sometimes required shouldn't be due another time once the Au Pair has already passed it in an Australian state or territory.

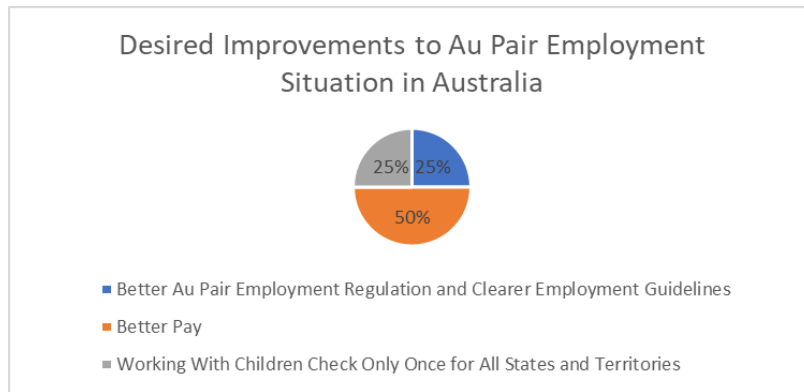


Figure 29: Desired Improvements to Au Pair Employment Situation in Australia; Author (2019)

4.3.3. Au Pairs in Norway

My study participants who were or are currently working as Au Pairs in Norway came from Western Europe, South America, and Eastern Europe, namely from Germany [2], Brazil [1], Russia [2], and the Ukraine [1]. The sample is thus not consistent with the current composition of the Au Pair market in Norway which is dominated by South – East Asian Au Pairs. Since especially the phenomenon of the large wave of South-East Asian Au Pairs in Norway have been investigated thoroughly by many other scholars, I chose a sample that would represent more Western cultural origins. This was also for the sake of comparability with the Australian market which is comprised of primarily Western Au Pairs.

Due to Norway’s relationship to the EU and EEA states the two German Au Pairs did not have to obtain an Au Pair visa to temporarily migrate to and work in Norway. The remaining four Au Pairs had to obtain an Au Pair visa to work in Norway.

The Norwegian Au Pair scheme and employment regulations were perceived as easy to handle and unbureaucratic by 83% of the Au Pairs.

5 out of 6 Au Pairs stated that they had used an Au Pair agency to find their host families in Norway. Most frequently used was greataupair.com [3] followed by aupairworld.com [1], and Atlantis Utveksling [1]. One Au Pair was recommended to her host family by a preceding Au Pair.

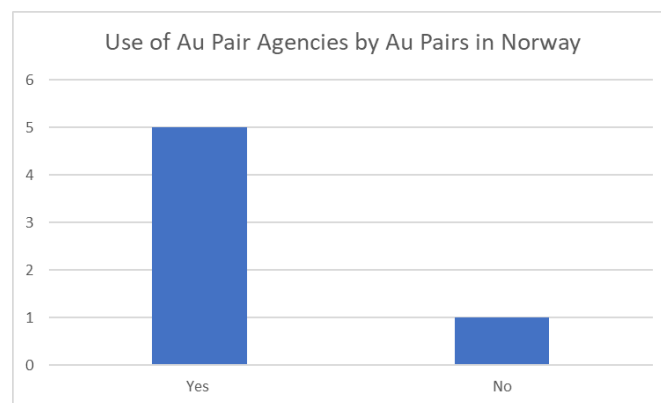


Figure 30: Use of Au Pair Agencies by Au Pairs in Norway; Author (2019)

When asked to define what being an Au Pair in Norway means and entails, 50% of all Au Pairs stated a combination of living in a host family, childminding, doing domestic work (chores), and participating in a cultural exchange. One Au Pair provided a similar definition but did not include domestic work as a definitional component. The Ukrainian Au Pair defined herself as a “[t]emporary family member who gets an amazing opportunity to start a new different life.”.

Albeit, in the case of the Au Pair from Brazil it became clear that Norway’s conceptual definition and popular global conceptualizations of Au Pairs can vary starkly. Thus, she said that she first assumed she would spend most of the time childminding, whereas she asserted disappointedly: *“But then I understood that my job is to clean and cook, so the parents can spend time with their children.”*

Just as in the Australian research part one Au Pair used the phrase “big sister” to describe the occupation.

The by far most conservative view on the Au Pair concept was asserted by one former Russian Au Pair who said that she considered being an Au Pair to be “(...) an anti-divorce program for young women”. Her stance was that “(...) every girl should get such experience” since living and being part in another family can make you “(...) understand lots of things”. Her belief is that if a “(...) girl participates in a such program, she will understand that being a wife is a hard-daily work.”

The perceived exploitation was relatively low so that only 17%, i.e. one German Au Pair, reported that she felt exploited by her host parents.

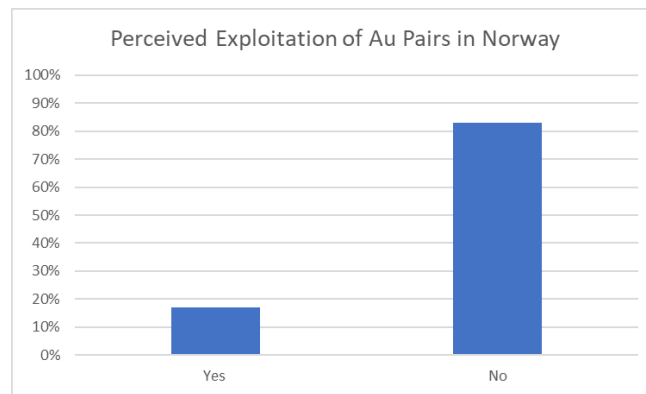


Figure 31: Perceived Exploitation of Au Pairs in Norway; Author (2019)

However, two thirds, i.e. 4 Au Pairs, reported that they had either changed or were going to change their host families. The Au Pair turnover rate, thus, seems to be quite high in Norway referring to my sample.

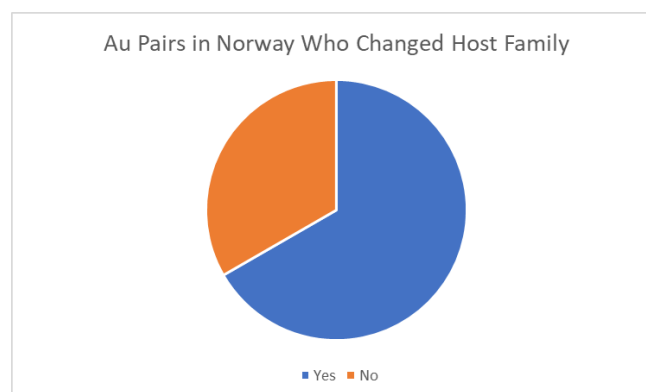


Figure 32: Host Family Change by Au Pairs in Norway; Author (2019)

One Au Pair did not answer the question regarding the amount of her remuneration. However, they all considered it to be pocket money. The reported figures equaled NOK 25 per hour [1], NOK 33 per hour [2], 47 NOK per hour [1], 56 per hour [1]. As a reference: the current hourly Au Pair wage in Norway is as of April 2019 NOK 5900 per month (UDI, 2019), which equals NOK 49 per hour (assuming 30 hours of weekly and 120 hours of monthly work). All Au Pairs that were interviewed reported that they had paid taxes on their income, respectively pocket money.

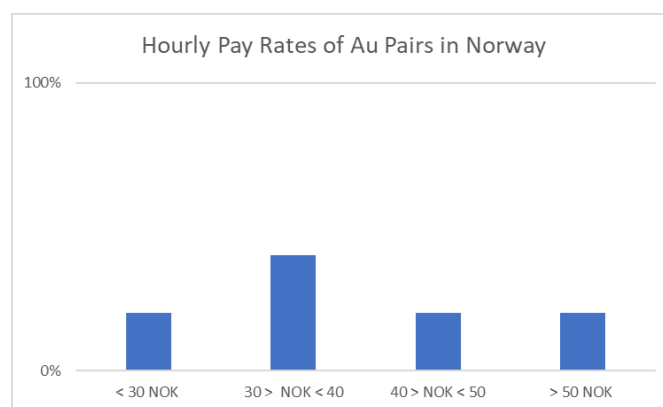


Figure 33: Hourly Pay Rates of Au Pairs in Norway; Author (2019)

All Au Pairs were employed by upper-middle-class families, whereas one German Au Pair was placed in an upper-class family in Stavanger after her first host family change. Nevertheless, the socio-economic disparities between Au Pairs and their host families were larger than in the Australian sample. 50% of the Au Pairs were lower-middle-class and came from Russia [2] and Brazil [1]. One third of the Au Pairs were middle-class and came from Germany and the Ukraine. One German Au Pair was upper-middle-class.

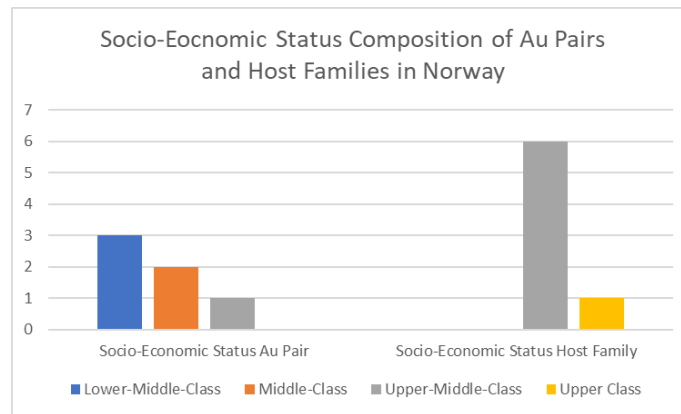


Figure 34: Socio-Economic Status Composition of Host Families and Au Pairs in Norway; Author (2019)

One half of the Au Pairs interviewed stated that they considered their employers to be “host parents”, whereas one third stated that they considered them to be a mix of employers and host parents, and one Au Pair considered them to be mere employers.

All Au Pairs stated that they spoke almost always English in and with their host families. 4 out of 6 Au Pairs stated that they had later also conversed partly in Norwegian. Two Au Pairs, one from Germany and one from Brazil, stated that they did not speak Norwegian at all in the host family.

83% of all Au Pairs would hire an Au Pair themselves in the future. One Au Pair stated that she was “not sure”. This stands in great contrast to the results among the Australian sample (50% rejection rate). The Brazilian Au Pair for instance said “if in the future I had the chance, I would definitely do it. This experience opened doors and changed my life, and I would love to

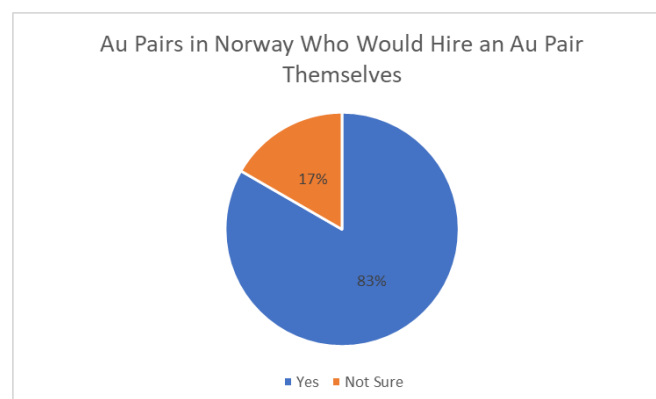


Figure 35: Willingness of Au Pairs in Norway to Hire an Au Pair Themselves; Author (2019)

do the same for someone in the future". Another German Au Pair said she would definitely hire an Au Pair herself "(...) *because it's beautiful for both sides*".

Only 1 out of 6 Au Pairs gave a concrete answer to the question of how high they would estimate the monetary value of the cultural exchange experience of their Au Pair stay. The figure assigned was NOK 400,000 for a time frame of 18 months.

Nevertheless, most Au Pairs gave detailed statements on the intangible value of their Au Pair experience and the most valuable experiences. The following things were mentioned and are here listed in descending order starting with the most frequently mentioned experience (cf. Tree Map Diagram in Figure 36):

- 1) Childcare/Childminding Experience (27%)
- 2) Living Abroad (18%)
- 3) New Language (18%)
- 4) Independence (18%)
- 5) Chance to Emigrate (9%)
- 6) Cultural Exchange (9%)
- 7) Learning about Women Equality and Environmental Protection (9%)

Interestingly, three Au Pairs, two from Russia and one from the Ukraine, of whom I interviewed two have migrated permanently to Norway after having worked as Au Pairs. The Ukrainian Au Pair for example told me enthusiastically about her post-Au Pair immigration process: *“My opinion on being au-pair changed from ‘part time job abroad’ to ‘life changing experience’, since I was able to study and start a career here in Norway.”*

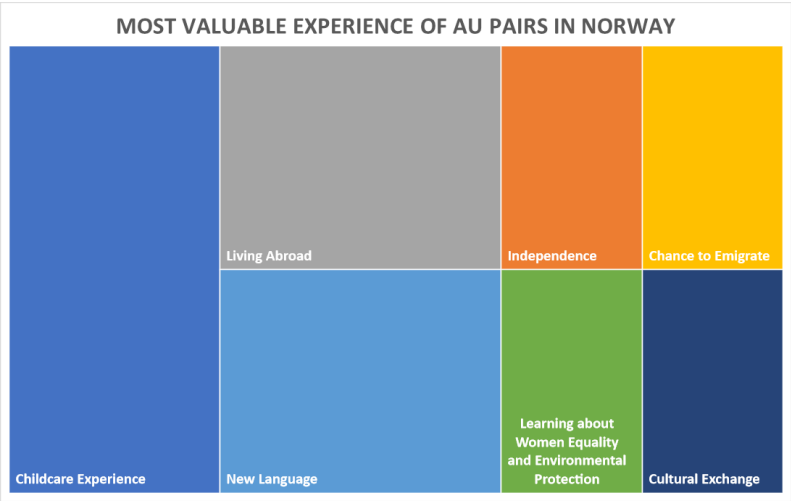


Figure 36: Tree Map of Most Valuable Experiences of Au Pairs in Norway; Author (2019)

4.4. Contemporary Grievances and Issues in Au Pair Tourism

4.4.1. Australia

As postulated before, the Australian Au Pair system relies exclusively on the Working Holiday Scheme which is designed as a means to give youths an opportunity to obtain a working permit and work and travel in Australia (Clarke, 2004; Harding & Webster, 2002; Kawashima, 2012)

Since the beginning of 2017, the so-called Backpacker Tax (15% on up to 37k AUD p.a.) applies to all earnings accrued in Australia using a Working Holiday Visa. Quite surprisingly,

none of my respondents who currently work or have worked as an Au Pair after the introduction of said tax, reported to actually pay or have paid taxes. Unsurprisingly, when talking about this tax in mid-2018 to a former employer of multiple Au Pairs in Australia, the former Au Pair employer confirmed to me *“nobody [referring to Au Pairs] pays taxes here; it’s all cash in hand”*. This practice is simply put on the border to tax evasion yet unprosecuted due to a current *legal gray zone*. Nevertheless, this was defended by my respondents, including both Au Pairs and Au Pair organization representatives, by arguing that the remuneration is not a wage or salary but *“pocket money”* and that *“the rules are yet a tad unclear”*.

There is yet no legally binding definition for Au Pairs in Australia causing great uncertainty regarding the employee status of Au Pairs.

The Au Pair agency market seems to be quite unregulated. The practice of charging Au Pairs money instead of exclusively charging host families seeking an Au Pair appears to be unjustified. One Au Pair felt exploited not by the family she was working for but by *“the organization because [her family] also paid a lot to them”*.

There appeared to be a tendency of support for the current working holiday scheme and visa so that only 50% of my respondents wished for a separate Au Pair visa or Au Pair scheme in Australia. The usual supplementary argument was that the Au Pairs felt like it is unjust having to use up the one-time issue of the working holiday visa and not being able to conduct a traditional working holiday thereafter. This poses a problem since it could be solved in two ways, namely changing the rules so that repeated participation in the working holiday scheme would simply be legalized or a separate Au Pairs scheme could be established, whereas latter option probably would prove more difficult to facilitate.

4.4.2. Norway

Norway contrary to Australia seems to fuel global inequalities and to reinforce post-colonialist power imbalances when considering the Au Pair recruitment practices and evolution of Au Pair tourism in the supposedly egalitarian Scandinavian country. However, just as for instance Bikova (2015, 2017); A. R. Hochschild (2000); Isaksen (2010) have described the functionality and basic constellation of global care chains, namely the counterbalance of the rich Global North exploiting the cheap domestic workforce from the Global South. Figure 37 depicts the GDP per Capita (PPP) Differences in percent between Norway its ten largest Au Pair source markets in 2018. The percentual difference between Norway's and its generating countries' GDP per Capita is 380%. In stark comparison Figure 38 just below shows the GDP differences of Australia and its leading nine Au Pair source countries in 2018. The percentual difference between Australia and its nine leading generating markets equaled 2%(!) ranging only between -18% and + 21%. For clarification purposes: a figure higher than 0% means the host country has a higher purchasing power on average and vice versa.

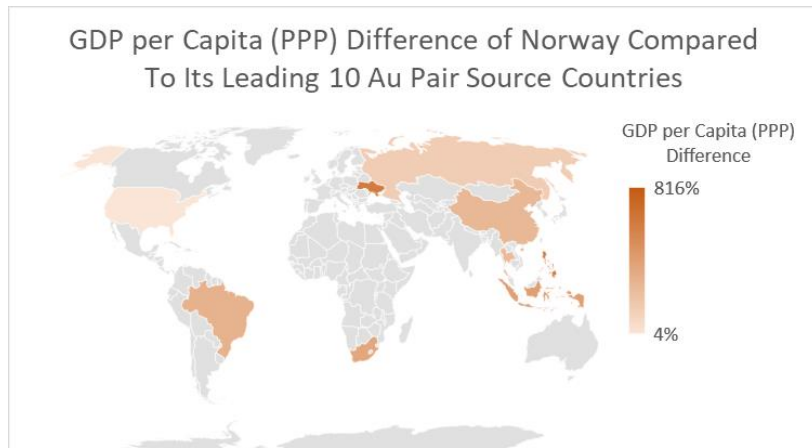


Figure 37: Map Showing GDP per Capita Differences between Norway and its Top 10 Generating Au Pair Markets; Author (2019), World Bank (2019)

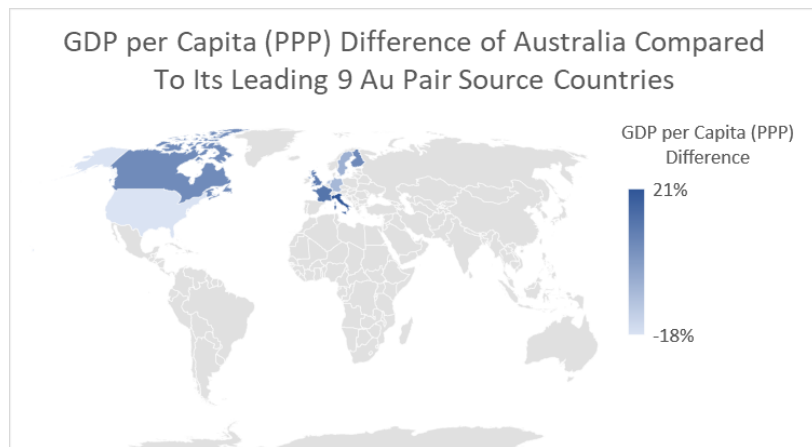


Figure 38: Map Showing GDP per Capita Differences between Australia and its Top 9 Generating Au Pair Markets; Author (2019), World Bank (2019)

4.5. Conclusion

Several grievances and issues in contemporary Au Pair employment in Norway and Australia could be identified by analyzing secondary sources as well as evaluating the primary data collected via qualitative interviews. Au Pair tourism in its current form has evolved to a global labor exchange scheme over the years. The general Au Pair employment framework including several weaknesses in both Norway's and Australia's system is visualized in Figure 39.

Core Issues in Australian Au Pair Tourism and Employment:

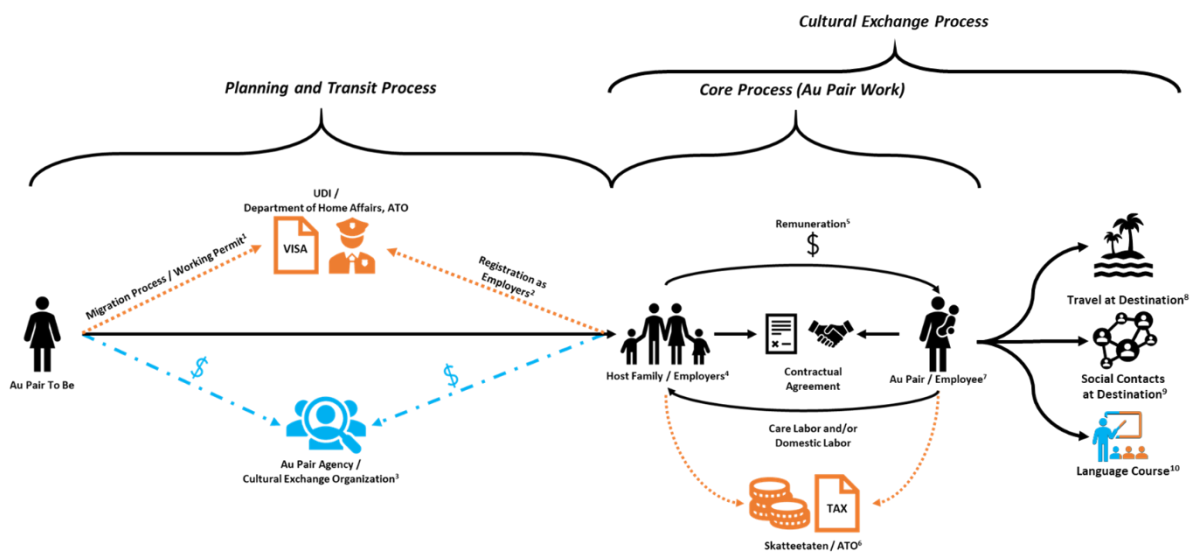
- Erratic interpretations by Au Pair agencies of taxation rules applicable to Au Pair wages could lead to tax evasion
- The lack of an Au Pair scheme putting Au Pairs in a vulnerable position as their self-description as “Au Pair” leads to the refutation of their employee status potentially entitling them to the national minimum wage
- Hesitation to dare assigning an estimated overall monetary equivalent value to the cultural exchange component downplays economic exploitation of the Au Pairs (80% of the interviewed Au Pairs were exploited when adhering to Berg et al.’s (2018, p.46) definition of Au Pair labor exploitation)
- The interviews showed that two thirds of the Au Pairs did see themselves being exploited contrary to 80% factually being exploited economically
- Lacking legal guidance by the government and contradicting statements by Au Pair organizations when answering the question whether Au Pairs and host parents are in a legal employer – employee relationship
- The absence of a legally binding definition for host parents and for Au Pairs (50% of Au Pairs refused the suggestion of a separate Au Pair scheme or Au Pair visa)
- The 6-months max. employment rule of the working holiday scheme leads to high Au Pair turnover rates in families
- 66% of all Au Pairs refused the idea of hiring an Au Pair themselves later in their own families supporting and preferring the non-familialistic childcare systems (great kindergarten coverage) of their European countries of origin (Germany and Denmark)

- Confusing rules regarding the Working With Children Check (WWCC) that is due in each state or territory an Au Pair works in (some are changing families after a while) causing unnecessary extra expenses for the Au Pairs (many don't get the WWCC)
- Australia has not ratified the International Labor Organization's Domestic Workers Convention of 2011 (C-189) that would legally-bindingly grant Au Pairs employee status and protect them as domestic workers

Core Issues in Norwegian Au Pair Tourism and Employment:

- Legal definition of Au Pair in Norway's Au Pair does not explicitly include childcare (83% of all Au Pairs in the study considered childminding to be the definitional main component of being an Au Pair)
- Norway's Au Pair scheme (Au Pair Ordningen) relies on the dated EC European Agreement on Au Pair Placement (ETS68) of 1969 that denies Au Pairs employee status and does not include childminding as a definitional component for being an Au Pair. Both, the European and the Norwegian Au Pair scheme starkly contradict present-day reality in Au Pair employment
- Childless couples can hire Au Pairs and participate in Au Pair scheme
- Norway doesn't grant Au Pairs employee status leading to limited labor rights of Au Pairs (50% of Au Pairs wanted the classification of Au Pairs as employees)
- Norway's top 10 Au Pair source countries in 2018 had an average GDP per Capita (PPP) disparity of 380% indicating the existence of an exploitative global care chain rather than cultural exchange Au Pair employment cycle
- Norway has an overly homogenous Au Pair market boasting annual Filipina Au Pair employment rates at above 88%

- Norway has not ratified the International Labor Organization’s (ILO) Domestic Workers Convention of 2011 (C-189) that would legally-bindingly grant Au Pairs employee status and protect them as domestic workers
- One third of the interviewed Au Pairs stated that they did not speak Norwegian at all with the families or the children; All Au Pairs stated that English was the prevailing conversational language (contradicts goals stated in Norwegian Au Pair scheme under Chapter 3.2.3.)



¹ = Norway: different rules apply to EU/EEA Au Pairs (no visa, just working permit) / Australia: origin country-specific visa subclasses
² = employer status and mandatory registration of host parents; debated in Australia
³ = 83% of interviewed Au Pairs in Norway used an agency; 83% of interviewed Au Pairs in Australia used an agency
⁴ = host parents' status as employers debated in Australia / Norway; childless couples are allowed to employ Au Pairs as well
⁵ = Australia: national minimum wage rules apply / Norway: Au Pairs nearly excluded from minimum wage system; only pocket money ("lommepenger")
⁶ = Norway: taxation rules apply to Au Pair remunerations / Australia: debated whether Backpacker Tax applies
⁷ = Norway: no employee status according to European Agreement on Au Pair Placement of 1968 / Australia: employee status debated; no official Au Pair definition
⁸ = especially common in Australia due to design of working holiday scheme
⁹ = all interviewed Au Pairs both in Australia and Norway socialized primarily with other Au Pairs → "Au Pair Social Bubble"
¹⁰ = employers in Norway are obligated to pay for language classes; Australian employers not

Figure 39: Principal Overview of Au Pair Tourism and Employment in Norway and Australia; Author (2019)

One core problem is the legal frame and employment guidelines for the Au Pair occupation in Norway, which allows an interpretation that conceptualizes the Au Pair first and foremost as a domestic worker primarily dedicated to executing chores and housework rather than childminding. Because of the non-worker status and the ineligibility to certain minimum wages

applicable to certain aforementioned occupational groups, for instance cleaning workers, I accrued data to compare quantitatively the costs of employment of a foreign Au Pair and a local cleaner over a timeframe of one year. The comparison takes into account in-kind payments such as room and board, as well as language courses that employers need to fund up to an amount of NOK 8850 per annum as of April 2019. However, there are no exact figures of what the equivalent monetary value is supposed to be regarding the in-kind payments in form of board and lodging. Since Ireland is as comparably wealthy as Norway and served as a prime example in Chapter 2, I considered the Irish statutes regarding the value of board and room for Au Pairs in Ireland that were established after the last landslide court rulings redefining the worker status of Au Pairs, i.e. Board € 0.85/h work, Room € 22.56/week). Of course, the equivalents were converted at the daily forex conversion rate of EURO to Norwegian Kroner on May 4, 2019 (approx. 1€ = 9.75 NOK)

	Au Pair	Cleaner / Housemaid
Board and Room	✓	✗
Language Course	✓	✗
Cleaning	✓	✓
Childminding	✓	✗
Minimum Remuneration	NOK 5,900 per Month = NOK 49 per Hour (30 h/week)	NOK 181.43 per Hour (+ NOK 26 from 21:00 – 06:00)
Net Employment Cost for 120 Hours of Labor per Month	NOK 5,900	NOK 21,771
Net Employment Cost for 1 Year of Labor (30 h/week)	NOK 70,800	NOK 261,259
Estimated Annual Value of In-Kind Payments (Board + Room + Language Course) B&R after Irish Statutes (Board € 0.85 per hour worked; room € 22.56 per week)	Room: € 1,173 p.a. ~ NOK 11,442 p.a. Board: € 1,224 p.a. ~ NOK 11,940 p.a. Language Course: NOK 8850 p.a. <hr/> = NOK 32,232 p.a.	✗
Gross Employment Cost for 1 Year of Labor ~ 1440 Hours of Labor	NOK 103,032	NOK 261,259

Figure 40: Comparison of Employment Costs of Au Pairs and Cleaners/Domestic Workers in Norway; Author (2019)

In Figure 40 it becomes apparent that Au Pairs provide several more services than a regular cleaner or housemaid at less than 40 percent of the total gross employment costs, more specifically 39.4% in the example illustrated above. It must be thoughtfully emphasized that it is entirely legal to hire an Au Pair in Norway, even as a childless couple, to render exactly the services listed above without having him or her perform any childcare or childminding tasks at all during the duration of his or her Au Pair stay in the country. The legality of this points out one of the large loopholes in the Norwegian Au Pair scheme in comparison to, for instance the Au Pair scheme of the United States of America, outlined in Chapter 2.3.3., where this would be an illegal practice. Since Norway does not have a general national minimum wage one has to look into occupation or sector-specific minimum wages. The average hourly rate paid to the Au Pairs I interviewed was NOK 34 per hour. Cleaning work, for instance, must be remunerated at a minimum hourly rate of NOK 181.43. Considering in-kind payment values, one should consider the legally deductible rates for hospitality workers receiving lodging from their employers. Arbeidstilsynet (2019) states that as of December 1st, 2018 employers can deduct NOK 541.12 per month for a single room, and NOK 351.95 per month for a shared double room.

5. Discussion

This chapter will discuss and evaluate the precedingly presented research findings.

I have developed an index based on the underlying assumption from my own research findings and secondary sources that describe the importance of socio-economic status and cultural background differences of the Au Pair generating countries and their Au Pairing destination countries. Much literary sources as well as my own research showed that there is likely to be a distinction between cultural exchange Au Pair tourism and extensive Au Pair employment trends that have been described as global care chains by several other authors including Bikova (2017); A. R. Hochschild (2000); Isaksen (2010); Kilkey (2010); Misra et al. (2006); Parreñas (2003).

The model which shall be named henceforth *Econo-Cultural Distance Index (ECDI)* feeds on two basic quantitative components, namely Gross Domestic Product (GDP) per Capita (with purchasing power parity, PPP) differences between host country and source country, and Professor Gert Hofstede's Culture Compass (cf. Hofstede (2009); Smith (2014)) that allows one to quickly compare countries according to six pre-set features , namely *power distance (p)*, *individualism (i)*, *masculinity (m)*, *uncertainty avoidance (u)*, *long-term orientation (l)*, and *indulgence (s)*, that are scored on scales from 0 to 100.

After a few attempts to come up with a formula that would visually reflect the aforementioned relations between host and source countries regarding socio-economic and cultural factors, I came up with the following formula:

$$ECDI = \frac{\Delta x}{600} \cdot \left(\frac{\alpha_{\text{source}}}{\alpha_{\text{host}}} - 1 \right)$$

ECDI = Econo-Cultural Distance Index

$$\Delta x = |x_{host} - x_{source}|$$

$$x = \{p, i, m, u, l, s\}^*$$

p = power distance

i = individualism

m = masculinity

u = uncertainty avoidance

l = long-term orientation

s = indulgence

α = GDP per Capita (PPP)

host = host country

source = source country

*values for different countries can be obtained from: <https://www.hofstede-insights.com/product/culture-compass/> (accessed on May 5, 2019)

The values derived via the abovementioned formula and the corresponding econo-cultural distance curve (approximated logarithmic function: $y = -0.377\ln(x) - 0.9752(x) - 0.9752$) for Norway and its leading ten source countries as well as Australia and its leading nine source countries are mapped in Figure 41 using the two elementary terms of the formula.

The X-Axis shows the increasing (progressing to the right) cultural difference between source and host country according to the term $\frac{\Delta x}{600}$ as an average over the 600 total points in Hofstede's six factor Culture Compass.

The Y-Axis portrays positive or negative purchasing power differences between host and source country. Negative means that the source country has a lower GDP per Capita (PPP) than the host country. A positive value means the exact opposite, namely that the source country has a higher GDP per Capita (PPP) than the host country.

An ECDI close to zero can be interpreted to stand for a higher likelihood of a cultural exchange Au Pair employment relationship between nationals of the respective host and source country. The more negative and thus most likely located lower on the y-axis and often farther right on the x-axis can be interpreted to resemble a higher likelihood for a global care chain or global south – global north care/domestic labor employment relationship.

	Germany	France	United Kingdom	Netherlands	USA	Canada	Italy	Finland	Sweden
$\frac{\Delta x}{600}$	0,22666667	0,28166667	0,091666667	0,183333333	0,03166667	0,07166667	0,23666667	0,173333333	0,235
$(\frac{g_{source}}{g_{host}} - 1)$	0,06434039	-0,1082668	-0,090283122	0,102150755	0,21363765	-0,0581028	-0,1712301	-0,0614646	0,04103042
ECDI	0,01458382	-0,0304952	-0,008275953	0,018727638	0,00676519	-0,004164	-0,0405245	-0,0106539	0,00964215

Table 1: Econo-Cultural Distance Curve Value Table for Australia and its Top 9 Au Pair Source Countries; Author (2019)

	Philippines	Ukraine	Thailand	USA	China	Russia	Indonesia	Brazil	Vietnam	South Africa
$\frac{\Delta x}{600}$	0,305	0,37666667	0,225	0,185	0,43166667	0,41	0,31	0,24833333	0,30333333	0,145
$(\frac{g_{source}}{g_{host}} - 1)$	-0,8655559	-0,8601203	-0,711974526	-0,036264514	-0,7291499	-0,585684	-0,8020488	-0,7498794	-0,8908044	-0,7824772
ECDI	-0,2639946	-0,3239786	-0,160194268	-0,006708935	-0,3147497	-0,2401304	-0,2486351	-0,18622	-0,2702107	-0,1134592

Table 2: Econo-Cultural Distance Curve Value Table for Norway and its Top 10 Au Pair Source Countries; Author (2019)

The area marked by a dotted blue line resembles a hypothetical area with a high likelihood of cultural exchange – based Au Pair employment relationships. The area surrounded by a dotted orange line shows a hypothetical area with lower and negative ECDI’s which mean a higher likelihood for global care chain employment relationships between Au Pairs from the source countries mostly located right hand side of and below of approximately [0.3, -0.8] (cf. Figure 41)

According to the data provided above and calculations executed I assume the following rules to be valid for a predictive distinction whether an Au Pair is in a global care chain – type of

employment relationship or participating in the actual traditional “at par” Au Pair cultural exchange relationship with his or her employers:

1) Cultural Exchange Au Pair Tourism (Traditional Au Pairing):

ECDI > (-0.05)

2) Culturally and/or Economically Motivated Au Pair Employment:

(-0.245) < ECDI < (-0.05)

3) Global Care Chain Au Pair Employment:

ECDI < (-0.245)

Therefore, the previously considered countries can be assigned to the three abovementioned as follows:

1) Cultural Exchange Au Pair Tourism:

Netherlands (0.019); Germany (0.015); Sweden (-0.01); USA (-0.007); U.K. (-0.008);
Finland (-0.011); France (-0.030); Italy (-0.041);

2) Culturally and/or Economically Motivated Au Pair Employment:

South Africa (-0.113); Thailand (-0.160); Brazil (-0.186); Russia (-0.240);

3) Global Care Chain Au Pair Employment:

Indonesia (-0.249); Philippines (-0.264); Vietnam (-0.270); China (-0.315); Ukraine (-0.324)

The cluster of countries in the lower half of Figure 41 resembles almost exclusively the Au Pair source countries of Norway (exception USA), whereas the cluster in the upper half resembles the source countries of Australia.

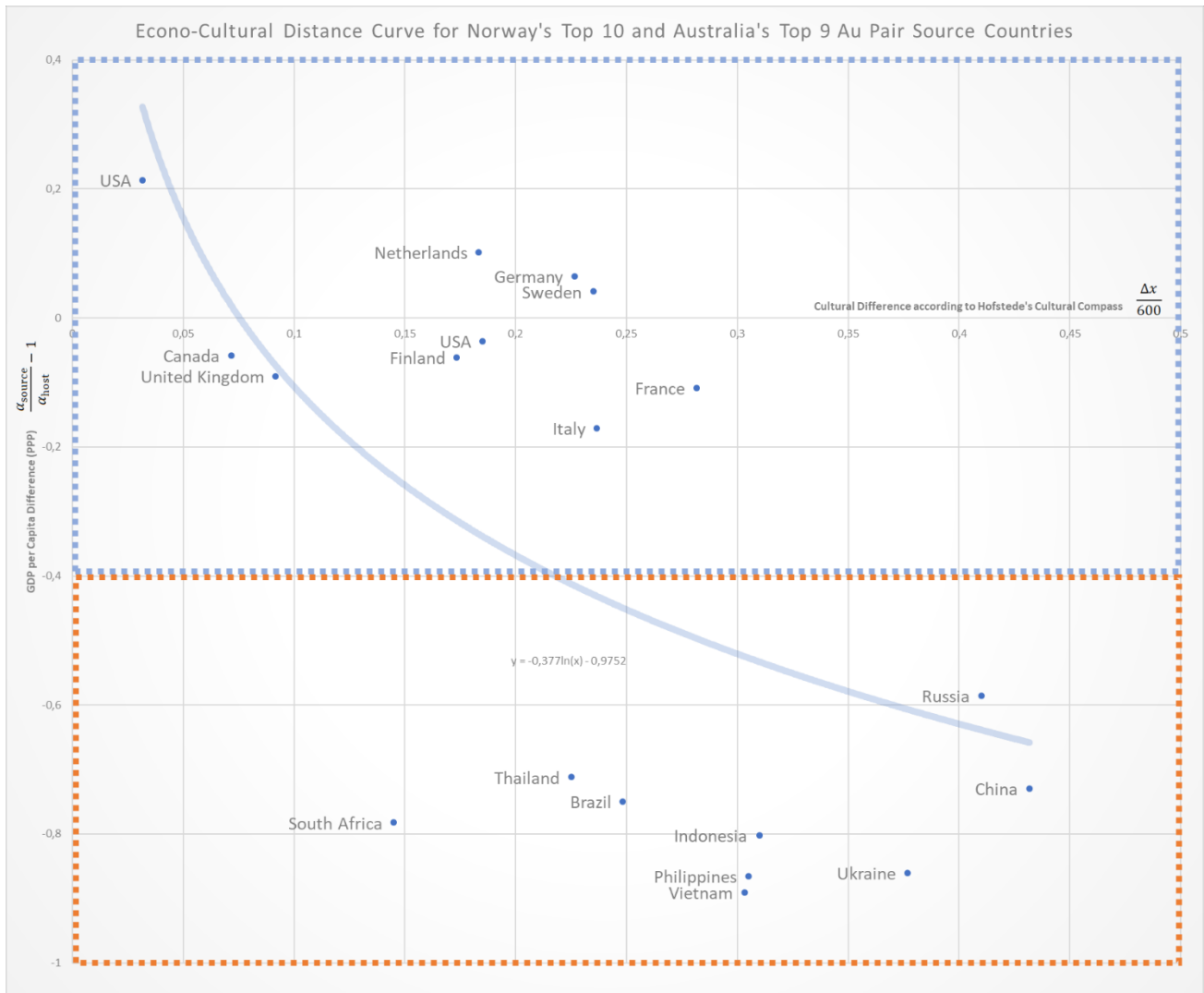


Figure 41: Combined Econo-Cultural Distance Curve for Norway's Ten and Australia's Nine Leading Au Pair Source Countries; Sources: Author (2019); GDP Data: World Bank (2019); Cultural Compass Data: hofstede-insights.com (2019)

5.1. Critique on the Norwegian Au Pair Employment Legislation

The Norwegian Au Pair scheme is dated regarding its core principles which are stemming from the middle of the last century and are anchored in ET068, namely the European Agreement on Au Pair Placement. Especially since most of Au Pairs are female, the inherent and systemic exploitation potential of labor incorporated in the European Agreement on Au

Pair Placement of 1969 as well as the Norwegian Au Pair scheme do indeed conflict with the egalitarian principles of the Norwegian society.

Findings by other scholars as well as my own study results leave little doubt that the Au Pair scheme contributes vastly to building a global care chain to the global south, primarily South-East Asia. The Au Pair scheme does not apply nationality quotas and has thus led to an excessively homogenous Au Pair market structure featuring approximately 90% Au Pairs from South East Asia.

The remuneration of Au Pairs for their labor has been proven to be insufficiently low by other scholars before and has been confirmed by my own research results.

The most severe grievance in the Norwegian Au Pair scheme is inadequate legal definition for Au Pairs that does not entail childcare as the core duty of Au Pairs and thus allows even childless couples to hire the young migrant workers.

By not recognizing the worker status of Au Pairs Norway has created a secondary labor market that flies under the radar of usually stringent employment regulation and great workers right protection.

However, investigating the experiences of predominantly western Au Pairs I was hardly able to confirm the findings of other scholars made when investigating Filipina Au Pairs or likewise.

5.1.1. Recommendations for Improvement

Norway should restructure its Au Pair scheme by:

- Introduction of nationality-based visa quotas (no exclusion)

- Recognition of worker status of Au Pairs
- Change in the award/remuneration system (minimum wage!)
- Change the legal definition of Au Pairs and emphasize childcare as the core task
- Regulation/vetting of Au Pair recruiting platforms and agencies (like manpower organizations)

5.2. Critique on the Australian Au Pair Employment Legislation

Even though Aylward (2017) on behalf of the CAPAA used findings from Laurie Berg's research, there is agreement that the Australian Government should create an Au Pair scheme going along with a new Visa Subclass. However, there is disagreement between the two experts on how an Au Pair Scheme for Australia should be constructed. In my interview with Laurie Berg she told me that she would not advocate a mandatory sponsorship via Au Pair or Cultural Exchange Organizations like in the J-1 system as in the United States. Aylward (2017) supports a system similar to the American J-1 Cultural Exchange Visa framework.

Berg et al. (2018) provided a definition for exploitative working conditions of Au Pairs in Australia (cf. Ch 2.4.2.4). They found out that one third of their sample had worked under exploitative working conditions. My study, of course on a way smaller scale, yielded a similar exploitation rate at first, namely 33%. However, this was the perceived exploitation. After filtering my results according to Berg et al.'s (2018) definition for exploitative working conditions, I received the result that 83% of my sample of Au Pairs in Australia had actually worked under exploitative conditions, thus either worked more than 45 hours per week or received less than AUD 13.50 per hour after deducting in-kind payments, such as board and room.

5.2.1. Development of an Au Pair Scheme Proposal for Australia

Taking into account the findings from other researchers as well as considering the legal and regulation development trends from Ireland, the USA, as well as the last ratified version of the ILO's Domestic Workers Convention, it is hardly justifiable not to recognize the worker status of Au Pairs.

The fear of the unaffordability of Au Pair employment as a result of the recognition of the worker – employer relationship of Au Pairs and host families is a position that is supported by mostly lobbying organizations and host parent associations which in my personal opinion try to defend an unjust legal gray zone trying to obtain a convenient and cheap childcare and housekeeper solution. Since the trend towards better childcare infrastructure as well as financial support for families is observable in Australia, the critical views of these stakeholders on a more just Au Pair scheme with a likely increase of employment costs compared to now should not be taken into account. This opinion rests on the fact that the prime motivation of Au Pairs has been identified as being cultural exchange and not childcare. Thus, a novel Au Pair scheme should build upon the principles of fair working conditions, recognition of workers' rights and no exemption from income tax. However, the Australian Au Pair scheme should feature nationality-based quotas and should furthermore be as inclusive as possible, i.e. no nationalities should be categorically excluded from participation.

The development of an Au Pair scheme would require further investigation and evaluation of possible alternatives and variants that could be used.

At this point and drawing on the current academic knowledge base on Australian Au Pair tourism it is still impossible to make reliable assumptions on the feasibility and efficiency of potential Au Pair schemes.

Yet, the Au Pair scheme if it were to be introduced soon should be clearly distinguishable from working holiday visas and permit only working as an Au Pair. After the introduction of an Au Pair scheme, working holiday makers should be categorically excluded from being hired by families as Au Pairs. To monitor this and to ensure legal compliance host parents should have to officially register as employers.

The Australian Government should furthermore carry out or order more research on current employment practices as well as investigate the needs and concerns of both host parents and Au Pairs so that the new law could form a well-designed compromise protecting the interests of both parties and to avoid exploitation.

5.3. Limitations of the Study

This study has been conducted over a timeframe of approximately ten months, i.e. from September 2018 until June 2019, including the pre-study in Australia. Since I chose to focus on and compare two spatially far apart countries it proved to be challenging to keep the two countries in constant comparison without leaving out too much detail.

I would have preferred to start the actual thesis work at an earlier stage but bureaucratic and communicative hindrances in academia thwarted my initially more ambitious plans.

Time-constraints did not allow to conduct both qualitative research and a quantitative survey alongside. Furthermore, this study focusses almost exclusively on the views of Au Pairs, organizations, and researchers, and does not feature any host parent or employer perspectives. In order to give a paint holistic picture of the Au Pair tourism and employment

landscapes in Australia and Norway further research obtaining the views of additional stakeholder groups, such as politicians or host parents would be necessary.

The response rate when recruiting Au Pairs, researchers, and organization representatives for interviews proved to be moderately high. Approximately 30% of contacted people did not respond at all, whereas about 10% of those who were willing to participate in my study did not react or provide answers after their initial “okay”.

Some Au Pairs did not dare to give interviews over Skype or telephone arguing their English would be too bad or they would not have sufficient time. Thus, some interviews were conducted written. In some cases, the Au Pairs had misinterpreted the questions and thus given unrelated answers that were later of no use to me since they referred to the wrong question.

5.4. Conclusion

Explaining Au Pair migratory movements within the wider concept of global care chains as done by several scholars, for instance Bikova (2015, 2017); Cox (2014); Hess (2009); Isaksen (2010), may be very tempting they fit the temporary care labor migrant movements of some fairly homogenous Au Pair markets, e.g. Norway and Denmark, that are vastly dominated by incoming Au Pairs from third-world countries, mainly the Philippines. However, these findings are neither globally generalizable nor in conformity with the principle of universal validity since the Australian market is dominated by western European, thus first-world, Au Pairs (Berg & Meagher, 2018). Au Pair tourism seems to be existent in a multitude of facets that depend heavily on national contexts of regulation, legislation, and interpretive meaning as well as conceptual definitions of Au Pairs by employers and themselves.

6. Conclusion

6.1. Key Findings

KEY FINDINGS OF STUDY ON WESTERN AU PAIRS IN NORWAY AND AUSTRALIA		
	General Information	
	Australia	Norway
Population	~ 25 million	~ 5 million
GDP per Capita (PPP)	\$US 49,378	\$US 62,182
Form of State	Parliamentary Constitutional Monarchy	Parliamentary Constitutional Monarchy
Childcare / Daycare Coverage	Mediocre	Very Good
Legally Binding Definition for "Au Pair"	NO	YES
Conceptual Definition Entails Childminding	n.d.	NO
Dedicated Au Pair Scheme / Au Pair Visa	NO (Working Holiday Scheme)	YES (EC ETS68 + AU PAIR ORDNINGEN)
Ratified ILO Domestic Workers Convention	NO	NO
Au Pair has Worker Status	Debated	NO
Au Pair Recruitment Agencies/Platforms Regulated Rigorously	NO	NO
Clearly Defined Remuneration	NO	YES
Tax on Income	Debated	YES
Average GDP per Capita (PPP) Difference to Top 9 Au Pair Source Countries	2.1%	382%
Main Au Pair Source Market Regions	Western + Northern Europe	South-East Asia; Eastern Europe
Main Au Pair Generating Country	Germany	The Philippines
Study Results		
Study Sample Nationality Composition	Germany (5), Denmark (1)	Germany (2), Russia (2), Ukraine (1), Brazil (1)
Personal Conceptual Definition of "Au Pair" Entailed "Childminding" or "Childcare"	83%	66%
Use of Au Pair Agency	66%	83%
Host Family Swap Rate	33%	66%
Exploitative Working Conditions (Perceived)	33%	17%
Exploitative Working Conditions (Factual)	83%	n.d.
Main Socio-Economic Class of Employers	Upper-Middle-Class	Upper-Middle-Class
Main Socio-Economic Class of Au Pairs	Upper-Middle-Class	Lower-Middle-Class
Primary Conversational Language: Au Pairs <-> Host Families	English	English
Average Hourly Rate	\$US 3.88	\$US 3.90
Average Hours of Work per Week	40.9 h	29.9 h
Percentage of Au Pairs Who Paid Tax on their Income	0%	100%
Average Monetary Equivalent of Cultural Exchange Experience (Tangible Value)	n.d.	n.d.
Most Important Au Pairing Experiences (Intangible Value) (Top 3)	<ol style="list-style-type: none"> 1. Independence 2. Childcare/Childminding Experience 3. Living Abroad 	<ol style="list-style-type: none"> 1. Childcare/Childminding Experience 2. Living Abroad 3. New Language
Most Desired Improvements to Existing Au Pair Employment System (Top 3)	<ol style="list-style-type: none"> 1. Better Pay 2. Clearer and Improved Guidelines for Au Pairs and Employers / Fairer Work Contracts 3. WWCC Once Taken Should be Valid for All States/Territories 	<ol style="list-style-type: none"> 1. Better Pay 2. More Free Time 3. Less Homogenous Nationality Composition of Au Pair Market
Support for New Au Pair Scheme/Visa	50%	/
Support for Worker Status of Au Pairs	66%	66%
Would Hire an Au Pair Themselves Someday	33%	83%

Figure 42: Key Findings of Study on Australia and Norway in Comparison; Author (2019)

Suggestions for Norway:

- Revoke Ratification of European Agreement on Au Pair Placement of 1968 OR push for an amendment of the treaty in the European Council
- Ratify the ILO Domestic Workers Convention
- Grant Au Pairs worker status
- Include childminding as a core task in the legal definition of Au Pairs
- Exclude childless couples from participation in the Au Pair scheme
- Au Pair host families should have at least one native Norwegian speaker or speaker of any other Scandinavian language OR Host family should have lived for at least 10 years in Norway
- Introduce a nationality quota-based visa system so that the Norwegian Au Pair market is distributed more evenly between several nationalities instead of primarily South-East Asian Au Pairs
- Increase the hourly rate of remuneration to at least NOK 90/h
- Get rid of the monthly minimum pocket money and 30 weekly working hours and rather promote flexible working times and hourly pay instead, i.e. families can get as much service as they need, want, or can afford
- The maximum number of legal hours should be increased to at least 40 hours per week in order to reflect reality and ensure fair remuneration
- Domestic work such as cleaning should be restricted to an absolute minimum; the focus of Au Pair labor should lie on cultural exchange and childminding; This is also to ensure a reduction of exploitative employment
- Au Pair agencies should be classified as manpower or recruitment agencies according to Norwegian law so that they are subject to stricter rules and regulations, e.g. it should

be illegal to charge Au Pairs for any matching or recruitment service, the costs should occur on the employer side

- Money transfers to non-EU/EEA states, especially South East Asia, should be restricted and or limited so that there are less incentives for young women from these regions to mistake the Au Pair scheme for an opportunity to save money and send home; Extra money earned should serve the purpose of buying goods, services, or to travel the country.
- Au Pairs should possess and prove sufficient funds to sustain their lives for a while without work in Norway; The suggested sum is NOK 30,000

Suggestions for Australia:

- Ratify the ILO Domestic Workers Convention
- Create a new Visa Subclass for Au Pairs and Au Pair Scheme
- Grant Au Pairs Worker Status
- WWCC should only be mandatory once and be valid for all territories
- Government should publish clear and simple guidelines for Au Pair employment
- No mandatory Au Pair organization sponsorship (don't follow U.S. J-1 example)
- Allow up to 24 months of work in one family
- Restrict Au Pairs with Au Pair Visa from jobs other than working as Au Pair/Childminder
- Strictly limit the hours of domestic work / chores that an Au Pair can be asked to work
→ Focus should be clearly on childminding
- Increase the minimum remuneration for Au Pairs → Au Pairs should not be used or seen as the "cheaper childcare alternative"
- Au Pair Visa should be a once-in-a-lifetime visa issue

- Au Pair Visa and Working Holiday Visa should not exclude each other
- Install a state-driven or state-supervised emergency and help hotline/online chat for Au Pairs
- Introduce a blacklist for abusive or exploitative Au Pair employers and ban them for a certain time from hiring Au Pairs
- Restrict Working Holiday Makers and Work and Holiday Visa holders from working as Au Pairs
- Au Pair agencies should be regulated as employment, manpower, or recruitment agencies by the state
- Introduce a seal or certificate for compliant and decent Au Pair agencies (state-certification)

6.2. Recommendations for Further Research

After having conducted this transnationally comparative study with specific focus on Australia and Norway, other popular Au Pair destinations should be investigated as well to see whether the findings and assumptions on regulated and unregulated markets hold true or must be adjusted. Furthermore, it would be interesting to carry out research on the topic of the perception of the value of the cultural exchange component of other temporary migrant workers employed in different fields of work. The findings would be relevant to either defend or reject Au Pair schemes that exclude Au Pairs from the worker category and deprive them thus of rights such as unionization or eligibility for minimum wage regulations.

I also suggest a study to determine the reservation price of Norwegian host parents, i.e. the price they are willing to pay for the services of an Au Pair, in order to see if a higher remuneration of Au Pairs is overdue.

In addition, further research should test the omnipresent hypothesis, or rather suspicion, that childminding was deliberately excluded from the conceptual definition of Au Pairs and their core tasks within the legal framework of the European Agreement on Au Pair Employment from 1969.

6.3. Final Remarks

This study showed that the forms of Au Pair tourism and the conception of Au Pairs vary greatly from country to country. Most sources and stakeholders referred to Au Pairs as cultural exchange youths who mind the children of host families and get to know a new culture in exchange for some monetary remuneration (pocket money) and usually board and lodging.

Whereas some countries, for instance the USA and Norway, provide profound and detailed Au Pair employment regulations or Au Pair schemes, other countries such as Australia do not have dedicated Au Pair schemes or any legal definitions for Au Pairs.

The European Agreement on Au Pair Placement which Norway bases its Au Pair scheme on has found to be dated and incompatible with egalitarian values, especially in Nordic societies, and contributes to the development of global care chains.

Both regulated as well as unregulated Au Pair markets can lead to exploitative working conditions. Denying Au Pairs their status as workers deprives them of crucial workers' rights and usually creates a large economic disadvantage compared to other (migrant) workers.

Furthermore, contemporary definitions for Au Pairs do not reflect in the employment legislations of neither Australia nor Norway. Undoubtedly, the historic conception of Au Pairs is broadly romanticized, yet implies a great risk as to deny the societal progress especially in Western societies that try to protect workers and their rights as well as try to employ egalitarian social standards.

It was not possible to obtain from Au Pairs detailed opinions or reliable estimates on the monetary equivalent of the cultural exchange component in their Au Pair working experience.

In this regard Australia as the unregulated market seemed to provide fairer remunerations than Norway considering comparable minimum wages for similar household tasks in Norway. The Norwegian Au Pair scheme implicitly values the annual cultural exchange experience at more than 10,000€, which seems unproportionate and calls for legal adjustments.

This study did not yield supporting evidence to claim that Au Pair schemes are superior legislative frameworks to regulate Au Pair tourism or Au Pair employment.

The presented Econo-Cultural Distance Index could be further tested on other country constellations as well as complemented by further aspects and factors in order to provide a means of preliminary risk identification so that the creation of large-scale global care chain employment via any Au Pair scheme can be avoided.

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8. Appendices

8.1. Visualization of Peter Dutton Au Pair Affair via Google Trends

Google Trends Search for **Keyword “au pair”**; Time Frame: Feb 9, 2014 – Feb 9, 2019; Region: Australia

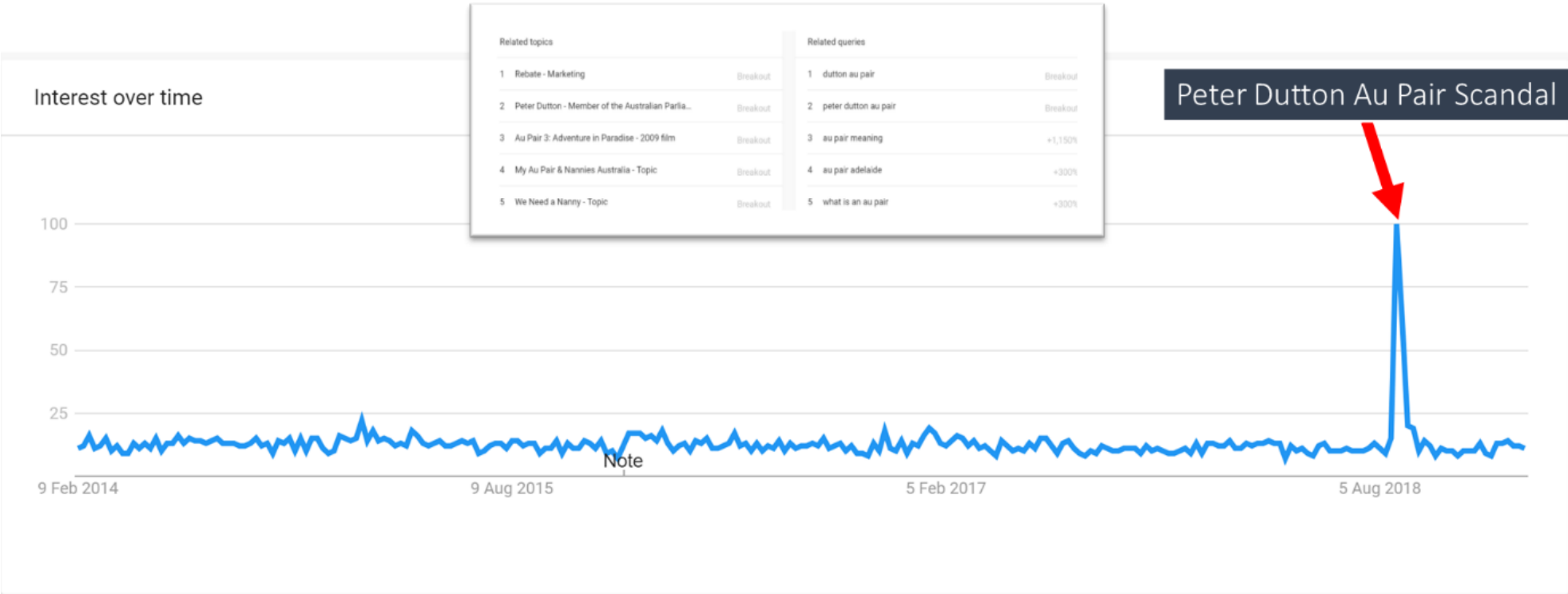


Figure 43: Google Trends Visualization of Peter Dutton Au Pair Affair via Google Trends Including Most Related Search Queries; Author (2019); Data: Google Trends (2019)

8.2. ETS 68 – European Agreement on Au Pair Placement

European Treaty Series - No. 68

European Agreement on "au pair" Placement

European Agreement on "au pair" Placement and Protocol thereto

Strasbourg, 24.XI.1969

The member States of the Council of Europe, signatory hereto,

Considering that the aim of the Council of Europe is to achieve greater unity between its members, in particular for the purpose of facilitating their social progress;

Noting that in Europe more and more young persons, especially girls, are going abroad to be placed "au pair";

Considering that, without wishing to make any critical assessment of this widespread practice, it is advisable to define and standardise, in all member States, the conditions governing such "au pair" placement;

Considering that "au pair" placement constitutes in member States an important social problem with legal, moral, cultural and economic implications, which transcends national boundaries and thereby takes on a European complexion;

Considering that persons placed "au pair" belong neither to the student category nor to the worker category but to a special category which has features of both, and that therefore it is useful to make appropriate arrangements for them;

Acknowledging more particularly the need to give persons placed "au pair" adequate social protection inspired by the principles laid down in the European Social Charter;

Considering that many of these persons are minors deprived for a long period of the support of their families, and that as such they should receive special protection relating to the material or moral conditions found in the receiving country;

Considering that only the public authorities can fully ensure and supervise the implementation of these principles;

Being convinced of the need for such co-ordination within the framework of the Council of Europe,

Have agreed as follows:

Article 1

Each Contracting Party undertakes to promote in its territory to the greatest extent possible the implementation of the provisions of this Agreement.

ETS 68 – "Au pair" Placement, 24.XI.1969

2

Article 2

1 "Au pair" placement is the temporary reception by families, in exchange for certain services, of young foreigners who come to improve their linguistic and possibly professional knowledge as well as their general culture by acquiring a better knowledge of the country where they are received.

2 Such young foreigners are hereinafter called persons placed "au pair".

Article 3

Placement "au pair" which shall initially be for a period not exceeding one year, may, however, be extended to permit of a maximum stay of two years.

Article 4

1 The person placed "au pair" shall not be less than 17 or more than 30 years of age.

2 Nevertheless, exceptions to the upper age limit may be granted by the competent authority of the receiving country in individual cases when justified.

Article 5

The person placed "au pair" shall have a medical certificate, established less than three months before placement, declaring that person's general state of health.

Article 6

1 The rights and obligations of the person "au pair" and the receiving family, as those rights and obligations are defined in this Agreement, shall be the subject of an agreement in writing to be concluded between the parties in question, in the form of a single document or of an

exchange of letters, preferably before the person placed "au pair" leaves the country in which that person was resident and at latest during the first week of the placement.

2 A copy of the agreement referred to in the preceding paragraph shall be lodged in the receiving country with the competent authority or the organisation chosen by this authority.

Article 7

The agreement referred to in Article 6 shall specify inter alia the manner in which the person placed "au pair" is to share the life of the receiving family, while at the same time enjoying a certain degree of independence.

Article 8

1 The person placed "au pair" shall receive board and lodging from the receiving family and, where possible, shall occupy a separate room.

2 The person placed "au pair" shall be given adequate time to attend language courses as well as for cultural and professional improvement; every facility as regards the arrangement of working hours shall be accorded to this end.

3 The person placed "au pair" shall have at least one full free day per week, not less than one such free day in every month being a Sunday, and shall have full opportunity to take part in religious worship.

ETS 68 – "Au pair" Placement, 24.XI.1969

3

4 The person placed "au pair" shall receive a certain sum of money, as pocket money, the amount of which and the intervals at which it is paid shall be determined by the agreement referred to in Article 6.

Article 9

A person placed "au pair" shall render the receiving family services consisting in participation in day-to-day family duties. The time effectively occupied in such services shall generally not be more than five hours per day.

Article 10

1 Each Contracting Party shall state, by listing them in Annex I to this Agreement, the benefits to which a person placed "au pair" will be entitled within its territory in the event of sickness, maternity or accident.

2 If and in so far as the benefits listed in Annex I cannot be covered, in the receiving country, by national social security legislation or other official schemes, taking into account the provisions of international agreements or the Regulations of the European Communities, the competent member of the receiving family shall, at his own expense, take out a private insurance.

3 Any change in the list of benefits in Annex I shall be notified by any Contracting Party in accordance with Article 19, paragraph 2.

Article 11

1 Where the agreement referred to in Article 6 has been concluded for an unspecified period, either party shall be entitled to terminate it by giving two weeks' notice.

2 Whether the agreement was made for a specified period or not, it may be terminated with immediate effect by either party in the event of serious misconduct by the other party or if other serious circumstances make such instant termination necessary.

Article 12

The competent authority of each Contracting Party shall appoint the public bodies and may appoint the private bodies to be entitled to deal with "au pair" placement.

Article 13

1 Each Contracting Party shall send to the Secretary General of the Council of Europe a report at five-yearly intervals, in a form to be determined by the Committee of Ministers, concerning the application of the provisions of Articles 1 to 12 of this Agreement.

2 The reports of the Contracting Parties shall be submitted for examination to the Governmental Social Committee of the Council of Europe.

3 The Governmental Social Committee shall present to the Committee of Ministers a report containing its conclusions; it may also make any proposals designed to:

- i improve the practical implementation of this Agreement;
- ii amend or supplement its provisions.

ETS 68 – "Au pair" Placement, 24.XI.1969

4

Article 14

1 This Agreement shall be open to signature by the member States of the Council of Europe, who may become Parties to it either by:

a signature without reservation in respect of ratification or acceptance; or

b signature with reservation in respect of ratification or acceptance, followed by ratification or acceptance.

2 Instruments of ratification or acceptance shall be deposited with the Secretary General of the Council of Europe.

Article 15

1 This Agreement shall enter into force one month after the date on which three member States of the Council shall have become Parties to the Agreement, in accordance with the provisions of Article 14.

2 As regards any member States who shall subsequently sign the Agreement without reservation in respect of ratification or acceptance or who shall ratify or accept it, the Agreement shall enter into force one month after the date of such signature or after the date of deposit of the instrument of ratification or acceptance.

Article 16

1 After the entry into force of this Agreement, the Committee of Ministers of the Council of Europe may invite any non-member State to accede thereto.

2 Such accession shall be effected by depositing with the Secretary General of the Council of Europe an instrument of accession which shall take effect one month after the date of its deposit.

Article 17

1 Any signatory State, at the time of signature or when depositing its instrument of ratification or acceptance, or any acceding State, when depositing its instrument of accession, may specify the territory or territories to which this Agreement shall apply.

2 Any signatory State, when depositing its instrument of ratification or acceptance or at any later date, or any acceding State, when depositing its instrument of accession or at any later date, by declaration addressed to the Secretary General of the Council of Europe, may extend this Agreement to any other territory or territories specified in the declaration and for whose international relations it is responsible or on whose behalf it is authorised to give undertakings.

3 Any declaration made in pursuance of the preceding paragraph may, in respect of any territory mentioned in such declaration, be withdrawn according to the procedure laid down in Article 20 of this Agreement.

Article 18

1 Any signatory State, at the time of signature or when depositing its instrument of ratification or acceptance, or any acceding State when depositing its instrument of accession, may declare that it avails itself of one or more of the reservations provided for in Annex II to this Agreement. No other reservation shall be admissible.

ETS 68 – “Au pair” Placement, 24.XI.1969

5

2 Any signatory State or any Contracting Party may wholly or partly withdraw a reservation it has made in accordance with the foregoing paragraph by means of a declaration addressed to the Secretary General of the Council of Europe which shall become effective as from the date of its receipt.

Article 19

1 Any signatory State, at the time of signature or when depositing its instrument of ratification or acceptance, or any acceding State when depositing its instrument of accession, shall make known the benefits to be listed at Annex I in accordance with the provisions of paragraph 1 of Article 10.

2 Any notification referred to in paragraph 3 of Article 10 shall be addressed to the Secretary General of the Council of Europe and shall state the date from which it takes effect.

Article 20

1 This Agreement shall remain in force indefinitely.

2 Any Contracting Party may, in so far as it is concerned, denounce this Agreement by means of a notification addressed to the Secretary General of the Council of Europe.

3 Such denunciation shall take effect six months after the date of receipt by the Secretary General of such notification.

Article 21

The Secretary General of the Council of Europe shall notify the member States of the Council

and any State which has acceded to this Agreement of:
a any signature without reservation in respect of ratification or acceptance;
b any signature with reservation in respect of ratification or acceptance;
c the deposit of any instrument of ratification, acceptance or accession;
d the lists of benefits listed at Annex I;
e any date of entry into force of this Agreement in accordance with Article 15 thereof;
f any declaration received in pursuance of the provisions of paragraphs 2 and 3 of Article 17;
g any reservation made in pursuance of the provisions of paragraph 1 of Article 18;
h the withdrawal of any reservation carried out in pursuance of the provisions of paragraph 2 of Article 18;
i any notification received in pursuance of the provisions of paragraph 2 of Article 19;
j any notification received in pursuance of the provisions of Article 20 and the date on which denunciation takes effect.

ETS 68 – “Au pair” Placement, 24.XI.1969

6

Article 22

The Protocol attached to this Agreement shall form an integral part of it.

In witness whereof the undersigned, being duly authorised thereto, have signed this Agreement.

Done at Strasbourg, this 24th day of November 1969, in English and French, both texts being equally authoritative, in a single copy which shall remain deposited in the archives of the Council of Europe. The Secretary General of the Council of Europe shall transmit certified copies to each of the signatory and acceding States.

Protocol

(Article 10)

1 Each Contracting Party makes the statement at Annex I and any subsequent changes thereto, entirely on its own responsibility.

2 The benefits listed at Annex I should ensure, as far as possible, that the cost of medical treatment, pharmacy and hospital care is covered. **ocol thereto**

Strasbourg, 24.XI.1969

The member States of the Council of Europe, signatory hereto,

Considering that the aim of the Council of Europe is to achieve greater unity between its members, in particular for the purpose of facilitating their social progress;

Noting that in Europe more and more young persons, especially girls, are going abroad to be placed "au pair";

Considering that, without wishing to make any critical assessment of this widespread practice, it is advisable to define and standardise, in all member States, the conditions governing such "au pair" placement;

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ETS 68 – "Au pair" Placement, 24.XI.1969

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Article 14

1 This Agreement shall be open to signature by the member States of the Council of Europe, who may become Parties to it either by:

a signature without reservation in respect of ratification or acceptance; or

b signature with reservation in respect of ratification or acceptance, followed by ratification or acceptance.

2 Instruments of ratification or acceptance shall be deposited with the Secretary General of the Council of Europe.

Article 15

1 This Agreement shall enter into force one month after the date on which three member States of the Council shall have become Parties to the Agreement, in accordance with the provisions of Article 14.

2 As regards any member States who shall subsequently sign the Agreement without reservation in respect of ratification or acceptance or who shall ratify or accept it, the Agreement shall enter into force one month after the date of such signature or after the date of deposit of the instrument of ratification or acceptance.

Article 16

1 After the entry into force of this Agreement, the Committee of Ministers of the Council of Europe may invite any non-member State to accede thereto.

2 Such accession shall be effected by depositing with the Secretary General of the Council of Europe an instrument of accession which shall take effect one month after the date of its deposit.

Article 17

1 Any signatory State, at the time of signature or when depositing its instrument of ratification or acceptance, or any acceding State, when depositing its instrument of accession, may specify the territory or territories to which this Agreement shall apply.

2 Any signatory State, when depositing its instrument of ratification or acceptance or at any later date, or any acceding State, when depositing its instrument of accession or at any later date, by declaration addressed to the Secretary General of the Council of Europe, may extend this

Agreement to any other territory or territories specified in the declaration and for whose international relations it is responsible or on whose behalf it is authorised to give undertakings.

3 Any declaration made in pursuance of the preceding paragraph may, in respect of any territory mentioned in such declaration, be withdrawn according to the procedure laid down in Article 20 of this Agreement.

Article 18

1 Any signatory State, at the time of signature or when depositing its instrument of ratification or acceptance, or any acceding State when depositing its instrument of accession, may declare that it avails itself of one or more of the reservations provided for in Annex II to this Agreement. No other reservation shall be admissible.

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2 Any signatory State or any Contracting Party may wholly or partly withdraw a reservation it has made in accordance with the foregoing paragraph by means of a declaration addressed to the Secretary General of the Council of Europe which shall become effective as from the date of its receipt.

Article 19

1 Any signatory State, at the time of signature or when depositing its instrument of ratification or acceptance, or any acceding State when depositing its instrument of accession, shall make known the benefits to be listed at Annex I in accordance with the provisions of paragraph 1 of Article 10.

2 Any notification referred to in paragraph 3 of Article 10 shall be addressed to the Secretary General of the Council of Europe and shall state the date from which it takes effect.

Article 20

1 This Agreement shall remain in force indefinitely.

2 Any Contracting Party may, in so far as it is concerned, denounce this Agreement by means of a notification addressed to the Secretary General of the Council of Europe.

3 Such denunciation shall take effect six months after the date of receipt by the Secretary General of such notification.

Article 21

The Secretary General of the Council of Europe shall notify the member States of the Council and any State which has acceded to this Agreement of:

- a any signature without reservation in respect of ratification or acceptance;
- b any signature with reservation in respect of ratification or acceptance;
- c the deposit of any instrument of ratification, acceptance or accession;
- d the lists of benefits listed at Annex I;
- e any date of entry into force of this Agreement in accordance with Article 15 thereof;
- f any declaration received in pursuance of the provisions of paragraphs 2 and 3 of Article 17;
- g any reservation made in pursuance of the provisions of paragraph 1 of Article 18;
- h the withdrawal of any reservation carried out in pursuance of the provisions of paragraph 2 of Article 18;
- i any notification received in pursuance of the provisions of paragraph 2 of Article 19;
- j any notification received in pursuance of the provisions of Article 20 and the date on which denunciation takes effect.

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Article 22

The Protocol attached to this Agreement shall form an integral part of it.

In witness whereof the undersigned, being duly authorised thereto, have signed this Agreement.

Done at Strasbourg, this 24th day of November 1969, in English and French, both texts being equally authoritative, in a single copy which shall remain deposited in the archives of the Council of Europe. The Secretary General of the Council of Europe shall transmit certified copies to each of the signatory and acceding States.

Protocol**(Article 10)**

1 Each Contracting Party makes the statement at Annex I and any subsequent changes thereto, entirely on its own responsibility.

2 The benefits listed at Annex I should ensure, as far as possible, that the cost of medical treatment, pharmacy and hospital care is covered.

8.3. Interview Guide Au Pairs Australia

Interview about Au Pair Employment Experiences in Australia

Interviewer: Michael Stiebe (m.stiebe@stud.uis.no) / cellphone: +4915116983145

Universitetet i Stavanger / University of Wollongong

Topic:

The Transnationalization and Commodification of Care Labor:
A Comparative Study on Contemporary Issues in Au Pair Tourism
in Australia and Norway with a Strong Focus on Employment Legislation

By answering the questions below I permit Michael Stiebe to use the data obtained through this interview anonymized in the abovementioned thesis project. I am aware that I can revoke this permission at any time in written form.

Questions

1. How old are you now? How old were you (if Au Pair in the past) when you were an Au Pair?
2. Where are you from?
3. What are your current and aspired occupation?
4. When and for how long were you an Au Pair in Australia? / For how long are you planning on being an Au Pair in Australia?
5. Where exactly in Australia were/are you an Au Pair?
6. How do you personally define an Au Pair?
7. Which visa (subclass or name) did you use?
8. Did you perceive the Australian system (visa, taxes etc.) as excessively bureaucratic?
9. How did you find your host family?
10. Did you ever change or consider changing host families?
11. What would you say was the family constellation (members, jobs) and socio-economic status of your host family?
12. What would say is your own family's socio-economic status and how does it relate to your host family's? (higher, lower, much higher, much lower) Were you really au pair (=at par)?
13. Do you think it plays a large role which cultural background or socio-economic status an Au Pair in Australia has?
14. What were/are your working times/hours?

15. What were your general tasks in the household?
16. Which language did you speak with the kids and the family?
17. Have you experienced any significant conflicts with the host family and if yes, what were they based on?
18. What are/were the biggest challenges during you Au Pair stay? What could be improved in the organization of Au Pair employment in Australia?
19. Did/do you consider your host parents as “employers” or “host parents”?
20. What was/is your hourly wage? Did/do you pay taxes on your income?
21. Did/do you ever feel yourself exploited?
22. What do you consider being an Au Pair to be, i.e. cultural exchange program, exchange student, seasonal work, care work, childcare...?
23. Should the state categorize Au Pairs as regular employees, foreign exchange students, working holiday makers, or something else?
24. Should there be an own visa subclass just for Au Pairs in Australia?
25. What were your imaginations about being an Au Pair before and during/after your stay?
26. Did your opinion change a lot and, if yes, how?
27. Did/do you socialize with other Au Pairs or locals mostly?
28. What were/are the most valuable experiences from your Au Pair stay, has your opinion on being an Au Pair, per se, changed significantly?
29. Can you imagine hiring an Au Pair yourself? Why yes/why not?
30. Do you want to add anything?

Thank you for your participation 😊

8.4. Interview Guide Au Pairs in Norway

Interview about Au Pair Employment Experiences in Norway

Interviewer: Michael Stiebe (m.stiebe@stud.uis.no) / mobile: +4915116983145

Universitetet i Stavanger / University of Wollongong

Topic:

The Transnationalization and Commodification of Care Labor:
A Comparative Study on Contemporary Issues in Au Pair Tourism
in Australia and Norway with a Strong Focus on Employment Legislation

By answering the questions below I permit Michael Stiebe to use the data obtained through this interview anonymized in the abovementioned thesis project. I am aware that I can revoke this permission at any time in written form.

Questions

1. How old are you now? How old were you (if Au Pair in the past) when you were an Au Pair?
2. Where are you from?
3. What are your current and aspired occupation?
4. When and for how long were you an Au Pair in Norway? / For how long are you planning on being an Au Pair in Norway?
5. Where exactly in Norway were/are you an Au Pair?
6. How do you personally define an Au Pair?
7. Which visa did you use?
8. Did you perceive the Norwegian system (visa, taxes etc.) as excessively bureaucratic?
9. How did you find your host family? (e.g. Agency, Social Media etc.)
10. Did you ever change or consider changing host families?
11. What would you say was the family constellation (members, jobs) and socio-economic status of your host family?
12. What would say is your own family's socio-economic status and how does it relate to your host family's? (higher, lower, much higher, much lower) Were you really au pair (=at par)?
13. Do you think it plays a large role which cultural background or socio-economic status an Au Pair in Norway has?
14. What were/are your working times/hours?

15. What were your general tasks in the household?
16. Which language did you speak with the kids and the family?
17. Have you experienced any significant conflicts with the host family and if yes, what were they based on?
18. What are/were the biggest challenges during you Au Pair stay? What could be improved in the organization of Au Pair employment in Norway?
19. Did/do you consider your host parents as “employers” or “host parents”?
20. What was/is your hourly wage? Did/do you pay taxes on your income?
21. Did/do you ever feel yourself exploited?
22. What do you consider being an Au Pair to be, i.e. cultural exchange program, exchange student, seasonal work, care work, childcare...?
23. Should the state categorize Au Pairs as regular employees, foreign exchange students, working holiday makers, or something else?
24. What were your imaginations about being an Au Pair before and during/after your stay?
25. Did your opinion change a lot and, if yes, how?
26. Did/do you socialize with other Au Pairs or locals mostly?
27. What were/are the most valuable experiences from your Au Pair stay, has your opinion on being an Au Pair, per se, changed significantly?
28. Can you imagine hiring an Au Pair yourself? Why yes/why no?
29. If you would have to assign a monetary value to the cultural exchange component of your Au Pair experience, how high would the figure be?
30. Do you want to add anything?

Thank you for your participation 😊

8.5. Interview Guide Prof Laurie Berg UTS

Interview Guide

Skype Interview with Prof Dr Laurie Berg of the University of Technology in Sydney

Date: February 7, 2019

Time: 10 am CET

Duration:

Consent for Audio/Video Recording obtained: YES / NO

1. How do you define an Au Pair?
2. Does the conceptual and legal definition differ from Au Pairs in Europe or the USA?
3. Do you think most families in Australia have a wrong conception of what an Au Pair is?
4. Have, and if yes how, the meaning, tasks, and duties of an Au Pair in Australia changed significantly over the last few decades?
5. Why does Australia have such a high demand for foreign Au Pairs?
6. Why is Australia such an attractive destination for international Au Pairs?
7. What are the most severe grievances and issues Au Pairs and host families are currently experiencing in Australia? Especially related to Au Pair employment legislation?
8. What do you think of the legal conversion of host parents into employers?
9. Why has the Commonwealth of Australia not yet established an official Au Pair scheme including a special visa subclass? What are the practical and/or legal obstacles?
10. If Australia were to adopt an official Au Pair scheme, what should be the cornerstones of such a regulatory framework?
11. Do you think the U.S. Au Pair regulations or the European Agreement on Au Pair Placement are good examples to adhere to when drafting an Au Pair scheme for Australia?
12. Should certain nationalities be excluded from participating in a possible Au Pair program? If yes, which? If no, why?
13. If they were to be eligible for participation in the Australian Au Pair program, would Filipinas take over the largest share of the market just as in Norway or Denmark?
14. Which role do the many Au Pair agencies play in Australia?
15. Should there be a mandatory agency sponsorship like in the United States or in the Netherlands for instance? Why?
16. Should there be police background checks, i.e. criminal record etc.?
17. What do you think of a blacklist for Au Pair employers after the model in Norway?
18. Do you think socio-economic status differences of Au Pairs and host families play a large role in how the relation between Au Pair and host family is?
19. Do you think an Au Pair should be a luxury and only be for upper middle-class and up?
20. Would a minimum household income be a reasonable requirement to be able to register as Au Pair employers?
21. If an Au Pair visa were to be established, what would be the minimum and maximum duration of work in Australia?
22. Should Au Pairs pay taxes?
23. What should be the minimum and maximum age for an Au Pair in Australia?

24. In a new Au Pair visa subclass, should there be nationality quotas to avoid an overly homogenous employment situation as in Norway or Denmark (Filipinas <88 percent)?
25. How can Au Pair employment conditions in Australia be made as easy and good as possible?

8.6. Interview Guide CAPAA

Questionnaire regarding Au Pair Employment in Australia

The Transnationalization and Commodification of Care Labor: A Comparative Study on Contemporary Issues in Au Pair Tourism in Australia and Norway with a Strong Focus on Employment Legislation

Author: Michael Stiebe, University of Stavanger, m.stiebe@stud.uis.no, +49-15116983145

1. How do you define an Au Pair?
2. Are Au Pairs in Australia part of the “*global care chain*”?
3. Is an Au Pair in Australia the same as in Europe or are there conceptual differences?
4. Do you think families in Australia have a wrong preconception of what an Au Pair is?
5. Have, and if yes how, the meaning, tasks, and duties of an Au Pair in Australia changed significantly over the last few decades? What are the core duties of Au Pairs today?
6. Why does Australia have such a high demand for foreign Au Pairs?
7. Why is Australia such an attractive destination for international Au Pairs?
8. What role do the many Au Pair (matching/recruitment) agencies play in Australia?
9. What role does CAPAA play in the larger picture of Au Pair tourism in Australia?
10. What are the most pertinent issues Au Pairs and host families are currently experiencing in Australia? Especially related to Au Pair employment legislation?
11. What do you think of the legal conversion of host parents into employers?
12. If Australia were to adopt an official Au Pair scheme, what should be the cornerstones of such a regulatory framework?
13. What are the legal obstacles to overcome to establish an Au Pair scheme in Australia?
14. Do you think the U.S. Au Pair scheme or the European Agreement on Au Pair Placement are good examples to adhere to when drafting an Au Pair scheme for Australia?
15. Do you think socio-economic status differences between Au Pairs and host families play a large role in how the relation between Au Pair and host family is and how the overall Au Pair experience turns out?
16. Do you think an Au Pair should be a luxury and only be for the upper middle-class and upper class?
17. Would the intangible value of cultural exchange in Au Pairing justify an exemption of Au Pair work from minimum wage?
18. Should Au Pairs pay taxes or be exempt from the backpacker tax?
19. What should be the minimum and maximum age for an Au Pair in Australia?
20. In a new Au Pair visa subclass, should there be nationality quotas or excluded nationalities to avoid an overly homogenous employment situation like in Norway or Denmark (Filipinas > 88% share)?
21. How can Au Pair employment conditions in Australia be made as easy and good as possible on the employer side and the employee side?