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Street vendors drawing their workplaces and surroundings during focus group discussions at the Bank Workers Trade Union in São Paulo, Brazil. Photo credit: Dino Santos

Strengthening Vendor Voices: Participatory Action Research for Inclusive Urban Governance

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Workers who earn a living in public space are an essential part of urban life. They include street vendors and market traders, who sell basic goods and provide essential services in their communities. But, for many vendors, obtaining a permit or securing a trading space is a major challenge. Local authorities are given the power to decide who can trade – as well as where, when, and how. Often authorities: do not allocate enough permits; locate vending sites in areas with little pedestrian traffic; set unaffordable trading fees; and make application processes complicated and time consuming.

These challenges are rooted in poor urban governance and improper decision-making processes, which reflect and reinforce the elite capture of urban space, resources, and regulatory systems. Local authorities are rarely transparent about the legal basis for decisions, making it difficult to determine whether they are acting within their power. They frequently take action without properly notifying those affected or providing an opportunity for those affected to engage with decision-makers and raise concerns.

Since 2018, WIEGO has innovated with different ways of leveraging administrative justice – a body of law that requires government officials to follow due process when they take administrative action – to build worker power, foster dialogue with local authorities, and promote more inclusive urban governance. Over the past eight years, we have consolidated a legal empowerment approach to administrative justice, combining different types of legal research, worker education, and alliance building. Participatory Action Research (PAR) with vendor organizations has been an increasingly central component.

This brief argues that legal empowerment can play a transformative role in strengthening collective organizing among self-employed workers in public spaces. Drawing on the evolution of our work and the lessons it has generated, we show how integrating PAR shifted our approach toward relationship-building and worker-led knowledge production. These practices did more than support workers in advancing legal claims; they fostered deeper changes in how workers understand their rights, exercise agency, and build collective power. Our experience suggests that, where informality is produced by exclusionary or poorly designed regulatory systems, legal empowerment must extend beyond individual access to legal remedies. It should be understood as a collective process through which workers identify systemic injustices, claim their rights, and shape the regulatory systems that govern their livelihoods.

The next section introduces the project, outlining its original approach and describing why, and how, we incorporated PAR. We then reflect on the impact this shift had on the project. Finally, we tease out broader lessons about the role PAR can play as a tool for legal empowerment with workers in informal employment and highlight where we see this work heading next.

Where were we starting from and how did our approach evolve?

We focused on administrative justice as a tool for promoting more inclusive urban governance, because most jurisdictions have embedded its principles in their constitutions, legislation, or

jurisprudence. Essentially, administrative justice requires that public officials take decisions and actions that affect people's rights and interests in a manner that is lawful, reasonable, and procedurally fair (see e.g. Kohn 2017).

As well as its broad applicability across jurisdictions, administrative justice connects fundamental rights to the everyday decisions of public officials. Labour law often excludes street vendors from its protections because they are classified as self-employed, while human rights litigation can be lengthy, costly, and difficult to pursue. Despite the limitations of many administrative systems, the hypothesis we wanted to test in the project is that administrative justice principles, as outlined above, provide a well-established and practical framework for improving routine interactions between street vendors and local authorities.

With support from the Open Society Foundation, in 2018 we launched the project in Mexico City, Accra, Dakar, and nationally in South Africa. The first phase focused on building workers' capacity to use administrative justice to challenge unfair actions by local authorities. Key activities included a multi-day training workshop in each location and building partnerships between vendor organizations and local public interest legal centres to facilitate access to legal support where needed. Research wasn't a major focus, but it did underpin the design of the workshops and training materials. Specifically, we commissioned local legal consultants to conduct desk research on the legal sources and principles of administrative justice in each jurisdiction, as well as the remedies available when those principles are breached.

At a learning meeting in June 2019, we celebrated several positive outcomes. Workshop participants reported a fundamental shift in how they thought about law – from seeing it as a weapon used to disrupt their livelihoods to recognizing its potential as a tool to protect their rights – and gained the confidence and skills to engage officials.¹ The project also strengthened access to legal support, with lawyers in South Africa and Mexico committing to providing ongoing assistance to informally employed workers.

¹ In South Africa, we know of at least five cases in which street vendors have successfully used administrative law to challenge local authority decisions. These included attempts to relocate vendors, temporarily suspend trading, and unlawfully confiscate goods. As one vendor explained, "They see that I am higher than them [in knowledge] because I know [the Promotion of Administrative Justice Act] and I tell them it is high time for councillors to know the Act". Another said, "I am my own lawyer now."

The learning process also revealed important limitations. One-off workshops were insufficient to sustain changes in practice, and the project required deeper engagement with local authorities, as well as legal support grounded in partnerships with workers' organizations rather than traditional top-down models (Marchiori 2022). As we continued our work in Accra, Dakar, and Potchefstroom, South Africa, we incorporated these insights by expanding the single-workshop model into a series that deepened critical legal consciousness and facilitated engagement with local authorities and legal professionals. We also broadened the research component to include legal, institutional, and contextual analysis, alongside a focus on International Labour Organization Recommendation No. 204 as a framework for rights-based urban governance. While these changes made the project more interdisciplinary and responsive to local contexts, its activities remained designed and led by our team, and the research continued to be conducted primarily by technical experts rather than workers themselves.

As the project progressed in Accra and Dakar between 2020 and 2022 (with an interruption during COVID), we found that while contextual research improved our understanding of the realities of vending, workers remained only superficially involved in project design and implementation. This limited both their ownership of the project and our understanding of the data. We realized that enabling workers to use administrative justice to challenge marginalization required them to exercise greater power within the project itself. Around the same time, WIEGO colleagues introduced us to PAR and the value of workers' deep involvement in research. Participating in the Legal Empowerment Learning Lab at NYU further highlighted the connection between PAR and legal empowerment.²

Power – and how to shift it – thus became increasingly central to the project's framing and theory of change. PAR held the promise of transforming expert-led data generation into a

collaborative practice that enables workers to leverage the power of data to tell their own story and identify their own pathways for change. By positioning people affected by an issue as co-researchers, PAR challenges power dynamics that marginalize “non-experts” through cycles of research, reflection, action, and learning. It is about “doing research with” people, not on them, to generate meaningful improvements in their lives.

We understand PAR as a spectrum, rather than a rigid model that can only be fully applied or completely disregarded. Participation can be more or less prominent – though always present – at different stages of the project cycle, depending on the role of the research within the project, its objectives, and the time, funding, and capacity available.³ Similarly, while the close link between research and action is a defining feature of PAR, the extent to which this can be achieved varies. Ideally, PAR is an ongoing cycle that becomes part of how groups pursue change. In practice, however, it is not always possible to complete the full cycle of research, reflection, action, and learning within the timeframe of a single project; it may need to be split up into more linear sequences of evidence-informed action.

As the third iteration of the project got underway, in December 2023, we started incorporating PAR into the research methodology. We worked with affiliates of StreetNet International: in São Paulo, with the União Nacional de Trabalhadoras e Trabalhadores Camelôs, Ambulantes e Feirantes do Brasil (UNICAB), an umbrella organization that brings together vendor associations, collectives, and movements across the country; and in two small towns in Zimbabwe – Karoi and Plumtree – with chapters of the Zimbabwe Chamber of Informal Economy Associations (ZCIEA). Each partner organization selected a team of four vendor-researchers among their leaders and members. They worked alongside a WIEGO lawyer on the ground, with remote support from other WIEGO team members.

² See NYU Law, “Legal Empowerment Learning Lab”. Available at: https://www.law.nyu.edu/centers/bernstein-institute/legal_empowerment/learning_lab

³ Relevant factors determining the right level of participation include how technical the research is and the capacity or availability of community co-researchers. In cases where the latter is more limited, there may be a “risk of the perfect becoming the enemy of the good; insisting on a degree of participation that is not practically feasible for your partner can end up recreating an extractive dynamic” (Corkery 2023).

The project adopted an iterative research approach, using PAR to accumulate a “progressively more interpretive and analytical picture” (Mukherjee et al. 2011, 55). Uncovering the root causes and underlying dynamics of the issues affecting vendors informed decisions about strategies to address them. While some aspects of the project were already set up, we were able to deepen vendors’ involvement as we went. Following an initial scoping visit, local experts analysed the regulatory and institutional frameworks governing street vending “on the books”, which informed the research design. Vendor-researchers helped shape research tools and collected and validated data on how these frameworks operate “on the ground”.

To support their role as co-researchers, we co-organized research training workshops where worker leaders and vendor-researchers refined research tools, shaped sampling strategies, and prepared for data collection. They then conducted interview and focus group discussions, not only to gather data but also to facilitate collective reflection on the principles of administrative justice, the rules regulating street vending, and urban governance. The data was then analysed and the findings brought back to vendor organizations through validation and planning workshops, where participants interpreted their significance and identified priorities and strategies for action.

Findings highlighted similar trends across project locations, underscoring the systemic nature of the injustices facing vendors. These include limited access to commercially viable vending spaces; inadequate infrastructure such as toilets, running water and shaded stalls; high and opaque authorization fees; and harsh enforcement practices, including violent evictions and confiscation or destruction of goods. In São Paulo, violence by the military police was a key concern, while in Zimbabwe respondents reported bribery and sexual exploitation by public officials. Validation and planning workshops identified similar underlying causes, including exclusionary urban governance characterized by limited transparency and accountability, restricted participation in decision-making,

and the criminalization of street vending – all contributing to strained relations between vendor organizations and local authorities.

Based on these reflections, UNICAB and ZCIEA focused their strategy on strengthening their visibility and engagement with local authorities by building members’ legal literacy; creating spaces for social dialogue; and improving their communication capacity.⁴ In Karoi and Plumtree, ZCIEA facilitated learning exchanges, multi-stakeholder forums, closed-door meetings with town councils, and clean-up campaigns in markets and public areas. In São Paulo, UNICAB faced greater resistance from the executive branch of government at the local level. Nevertheless, they have built alliances within the legislative branch of government, gaining commitment from a group of councillors from the Partido dos Trabalhadores (PT) to advocate for street vendors’ rights within the municipal council.

The structure and timing of the project meant we couldn’t conduct a second full round of data collection to assess the results of these actions. We carried out periodic learning activities, which highlighted the impact PAR has had on the project. But, to institutionalize PAR within a worker organization – to create a sustained cycle of illuminating issues and needs, devising solutions, testing results and assessing change – developing a methodology for tracking engagements with local authorities on a more ongoing basis would be valuable.

What difference did PAR make?

Incorporating PAR felt like a natural fit for the project, given WIEGO’s political commitment to supporting worker organizations to build power. But that alignment was more something we’d assumed than deeply interrogated. As legal practitioners supporting workers in informal employment, we were closer to our co-researchers than purely academic researchers would have been, so had less of a gap to bridge with them in designing the research. However, we hadn’t fully anticipated the flipside of this positioning: it meant that we had less technical research knowledge, for example, about mobilizing workers to participate in the research, a significant issue in São Paulo, as described below.

⁴ In this context, securing legal assistance for worker organizations by engaging public interest and pro bono lawyers became less of a priority.

We were drawn to PAR's political advantages – the deep engagement its iterative process allowed – more than we had weighed its practical cost. In hindsight, PAR proved far more time- and resource-intensive than engaging technical consultants. Training worker-researchers took repeated follow-up sessions rather than a single workshop; piloting of the data collection tools stretched on as we worked through the intended meaning of the questions to ensure accuracy of translation; and analysis slowed further given the vendor-researchers' limited prior research experience. Whether that cost is inherent to PAR or a function of the capacity-building it demanded of us is difficult to judge.

Despite these challenges, incorporating PAR into the project has yielded a number of benefits that outweighed the cost. In particular, it strengthened cohesion within our partner organizations and boosted our capacity to support them to calibrate advocacy and movement-building strategies to local realities. As discussed below, this influenced both how the project was implemented and how partners responded to emerging opportunities and challenges.

PAR enabled rich, multi-level contextualization – essential when the primary aim of research is to inform action for systemic change.

As outlined above, we used multiple methods to examine the complex reality of street vending from different angles. Two aspects of PAR were particularly important for this: the deep involvement of participants throughout the research process and its iterative nature. Together, these created a continuous feedback loop that kept workers' knowledge at the centre of the research. Even when it slowed things down, we took the time to ensure that each step was tested against their lived experience, allowing the research tools to be progressively sharpened and the findings to be collectively interpreted.

For example, data showed that in the São Paulo central subprefecture of Sé, the majority of vendors operate without a licence. This gained different meaning when we learned that the current street vending regulation makes it almost impossible to obtain access to desirable vending spaces and natural markets. Survey data and

focus group discussions pointed to widespread frustration with the "To Legal" regime, which has replaced long-term vending authorizations with three-month permits, pushing vendors to operate outside the system. Additional interviews with administrators revealed they perceived street vending as a temporary occupation.⁵ This insight into the mindset underpinning the To Legal regime helped to better contextualize the barriers to collaboration with the municipality and highlighted the importance of shifting dominant narratives about street vending.

The participatory nature of PAR also helped connect research, reflection, and action more directly.

Involving partners in conversations about the research from the start helped keep it focused on their priorities for change and on how the findings could be used to achieve it. Again, their role in validating the research questions and designing the data collection tools added to the length and intensity of the research process. But it also ensured we stayed aligned and responsive to changing circumstances, new opportunities, and additional information. For example, in Karoi, one of the priority issues the research examined was high vending fees. An opportunity to address this concern subsequently arose when ZCIEA learned that the national government had issued regulations to cut small business fees by 50%. Realizing that these regulations excluded informal traders, they wrote a letter to the municipal finance director, who invited them to participate in the next municipal budget meeting.

The emphasis on co-learning is another aspect of PAR that proved valuable for building common ground and shared ownership.

In our experience, building a common understanding of the work we are doing and a common language to talk about it can be challenging for new partnerships – particularly given the power asymmetries that exist between worker organizations and their global allies. We may think we have a common purpose and a shared vision for change, but fail to understand each other while apparently speaking the same language. In the context of this project, this challenge was even more pronounced because of the technical nature of the law. At the start

⁵ In the context of our partnership with the Harvard International Human Rights Clinic, described later in the brief.

of the project, there was a lot of variation in how our partners articulated what we were doing together and why. Building discursive access – a process of translation across different mindsets and ways of thinking (Otto and Terhorst 2011) – therefore became a central priority. We invested a lot of energy into ensuring that our vendor-researchers were clear on the project's purpose and approach and could explore complex legal concepts on more equal terms.

PAR provided an effective way to build this shared understanding. Throughout the project, we created structured opportunities for co-learning and developed creative methods for collective reflection. Across different stages of the process – including focus groups and validation workshops – we introduced key concepts such as administrative justice, vending regulations, urban governance, and local government structures in accessible ways. For example, during focus groups, workers took part in a “gallery walk,” responding to posters on laws affecting their work by writing Post-it notes reflecting their experiences and whether these aligned with the official descriptions. This process helped ensure that findings accurately reflected workers' realities and highlighted priority areas for capacity-building.

As a result, a shared understanding emerged of how vendors' rights are violated and how they can be collectively asserted. This was apparent in Karoi when, after an administrative justice learning exchange that featured Zimbabwe's Administrative Justice Act (AJA), workers spontaneously coined a slogan, “Vendor AJA!”, which signified a call to vendors to use the AJA in their struggle. This play on the word “aja” – which in a Shona dialect relates to eating or not being eaten – also emphasizes how the AJA can be a pathway to addressing injustices that have threatened their livelihoods and that it could be a tool to strengthen their bargaining power with authorities.

This, in turn, broke down barriers, enabling UNICAB and ZCIEA to participate as equal partners in the project. They spoke openly, challenged aspects of the project design, and proposed alternative approaches grounded in their own knowledge and experience. For example, both organizations advocated for branded regalia – such as T-shirts, flags, and reflector bibs – to increase their visibility. ZCIEA also proposed monthly clean-up campaigns to strengthen relationships

with local councils and create opportunities for dialogue. Although these activities were not part of the original project design, they proved highly effective in enhancing the organizations' credibility with key stakeholders. The confidence developed also had lasting organizational effects. After vendor-researchers successfully co-led the research, ZCIEA's national leadership devolved greater responsibility for follow-up activities, strengthening local ownership and agency.

That said, shared ownership of the project was not without its complications. We had to navigate organizational and interpersonal dynamics within our partner organizations. Differences of opinion arose over seemingly practical issues – such as who should participate in the research, where interviews should be conducted, and whether and how participants should be compensated – but these often reflected deeper political differences in strategy and approach. Conscious of the structural power we held relative to our partners, we were reluctant to challenge decisions in ways that might reinforce existing power asymmetries or undermine local ownership. The predominantly remote nature of the collaboration also made it harder to build the trust needed to examine decisions collectively, without such discussions being perceived as external control. As a result, there were decisions we accepted even though we had questions about their implications for the research. This experience underscored that shared ownership does not eliminate asymmetries of power. Rather, it requires continual negotiation over how concerns are raised, discussed and resolved in ways that preserve both the integrity of the research and the agency of partner organizations.

PAR also provided an opportunity for UNICAB and ZCIEA leaders to connect with and mobilize their base in ways they hadn't been able to before.

Over a period of more than two years, our partner organizations engaged with vendors during scoping visits, interviews, focus group discussions, validation workshops and a host of “action” activities in each location. These sustained interactions – made more visible through branded regalia – built vendors' trust in the organizations, resulting in increased interest and participation in the activities, and, in Zimbabwe, an increase in membership. A leader in Karoi remarked: “They

saw that it was us doing the research and not those people that come from somewhere and then disappear. By the time we came back to invite them to other activities, they could trust us because we had been around the whole time. They knew it wasn't another scam."

In São Paulo, PAR revealed and helped address some of the challenges with UNICAB's umbrella structure. For the field research, we chose two locations that offered interesting comparisons. The Sé subprefecture, in the overcrowded and commercially desirable city centre, was plagued by lack of access to vending space and police violence and harassment. Jabaquara, by contrast, is a less central region with more stable and less conflictual vending arrangements. UNICAB had strong ties with vendors in Sé, where the organization of one of the worker-researchers (and UNICAB leaders) is active. But, in Jabaquara, the local vendor association was not a UNICAB affiliate, and the relationship with local leaders was limited. Conducting surveys therefore proved challenging, and it was not possible to hold focus group discussions. In hindsight, we placed too much faith in the process, assuming that a participatory approach would naturally lead to the right decision. This meant we did not critically examine the factors motivating our decision, leading us to underestimate the practical challenges of conducting research in Jabaquara.

Despite this setback, UNICAB's deep involvement – along with the fact that the vendors themselves conducted the research – helped build trust and mobilize the Jabaquara vendors. Overcoming their initial distrust, the vendors came to view UNICAB as their champion and remained engaged throughout the rest of the project. In both locations, leaders shared that UNICAB's increased visibility was the "light at the end of the tunnel" for vendors struggling with police abuse and scarce access to vending spaces, as they felt that "someone sees them and cares about their issues, and is ready to fight for them".

In both countries, improved engagement with their membership base resulted in vendors' greater commitment to collective action as part of the organized labour movement. A leader in Plumtree described how vendors were working more collaboratively than they had in the past:

"We have changed the way we handle issues. When there is a problem, we tell each other. We no longer say "indoda iyazibonela" [each man for himself]. We come together and we fight. People don't just go to the council with each one making noise about their own demands". UNICAB's visibility and increased organizational strength was also a key factor in the decision of the Central Única dos Trabalhadores (CUT), the main national trade union center in Brazil, to affiliate it.⁶

Finally, PAR proved highly effective in fostering a critical and strategic understanding of the law.

This involves recognizing that law is not sacrosanct, but shaped by power relations that determine whose interests are protected and whose are marginalized through definitions of what is lawful and unlawful. Throughout the project, we created spaces for collective reflection on how law interacts with the everyday realities of street vendors, helping participants interrogate how gaps in legal frameworks produce contradictions between "law on the books" and "law in practice". This enabled vendors to better articulate how local regulations can arbitrarily criminalize the use of public space for livelihoods, even where national constitutions and international agreements recognize the rights to work of all workers, including those in informal employment (Bamu 2019:13).

Again, the sustained, participatory nature of PAR – and its slower pace – was key. It allowed participants to appropriate legal language and strategize on how to use it in engagements with authorities, rarely possible in one-off workshops. For example, a UNICAB local leader described being struck by the recognition that the right to work is enshrined in constitutional and international law. She now reminds vendors, public officials, and fellow leaders that street vendors are workers and must be recognized and protected as such. Similarly, vendors in Karoi explained how knowledge of the law and negotiation skills changed their interactions with the city council: "We did not know about going to the council, we didn't know how to deal with them. We used to go and shout at them. Now we know that we need to negotiate properly and discuss the issues with them."

⁶ This decision was all the more relevant since UNICAB is only the second organization of workers in informal employment affiliated to CUT.

As vendors have started using the law more strategically, local authorities' attitude towards them and their willingness to engage with them and hear their concerns have begun to change. In Karoi, vendors noticed a clear shift in their relationship with the Town Council: "the Council recognizes us as partners and sees the work we have done – they invite us to meetings. They are more understanding about the demands, for example about the rates and fees". A UNICAB leader also reported a similar change: "[authorities] now respect me, and they listen".

What did we learn from the project?

First, the project broadened our conceptualization of legal empowerment.

As Di Giovanni and Bercovich note, the goals and methods of legal empowerment can be cast "in broader or narrower" terms. Reflecting its roots in community legal aid, the more focused definition "tends to emphasize supporting the agency and capacity of individuals to claim rights on a more case-by-case basis". A broader definition encompasses efforts to address structural injustices by shifting power dynamics (2025: 8).

At WIEGO, our first entry point into legal empowerment work fell more squarely in the first definition. In 2021, we started co-designing a legal empowerment approach with the International Domestic Workers Federation (IDWF) to address barriers to accessing justice for domestic workers in Africa.⁷ This included a pilot that has so far trained 50 domestic workers in three countries to provide paralegal services through their unions. Although we had not initially framed this project as legal empowerment, the experience of accompanying vendor organizations to know and use administrative justice principles and R204 – in order to shape urban governance – convinced us that this kind of work also fits within the legal empowerment paradigm. When the law is revealed as a social construct that can and should be changed when unjust and unresponsive to the needs of those it regulates, the three pillars of legal empowerment – know, use and shape the law – come to life.

Despite the different focus of their activities, we have seen a number of parallels in the outcomes of both projects. In particular, it's clear that engaging with the law – as a source of protections and entitlements that should be guaranteed – can strengthen workers' collective identity, offering a common framework through which workers can "make sense of and give meaning to their reality" to catalyze collective action (Corkery 2022: 376). For us, this reinforces the importance of seeing all legal empowerment activities – even those more focused on resolving specific problems in individual cases – as part of a broader effort to support worker organizing around shared legal issues, in order to build the collective power needed to "fundamentally alter unjust systems" (Satterthwaite 2022: 7). For example, discussions among domestic workers about individual rights violations, drawing on legal knowledge, helped surface shared experiences. This strengthened solidarity and a shared identity as workers – a critical starting point for organizing to challenge systemic injustices.

Second, the project enriched our understanding of the role PAR can play as a tool for "scaling deep" through legal empowerment.

Scaling deep is a transformational strategy for systems change focused on changing mindsets and building trust, to establish "a more balanced and inclusive societal fabric" (Fraser 2023:19). Incorporating PAR into the project led us to prioritize relationship-building and worker-led knowledge production. We saw how much more this does than just help workers advance legal claims; it inspires deeper cultural shifts in how workers understand rights, exercise agency, and contest power.

Seeing themselves as rights holders, as legitimate economic actors whose fundamental rights were recognized and protected, helped build a shared identity. As some of the participants said, the research and advocacy activities helped them see themselves in the law: "We were criminals, we were outlaws, now we know we have a law that protects us. [Public officials] have to respect us and must act in certain ways according to the law". In São Paulo, one of the participants in the validation

⁷ See WIEGO, "Domestic Workers Legal Empowerment Training". Available at: <https://www.wiego.org/themes/legal-empowerment/domestic-workers-legal-empowerment-training/>

workshop shared the deep transformation he experienced: “When I joined the project, I felt small – now I come out of here like a giant”.

Collaborating with worker leaders and using multidisciplinary methods to uncover how gaps between “law on the books” and “law on the ground” disempower workers and design strategies to change this shifted our approach to building legal knowledge – from something that is delivered to workers, to something produced with them. The iterative nature of PAR – with its emphasis on reflection and learning – was a particular strength in this regard. As Coultas (2022) stresses, reflection plays a key role in linking research and action. It produces evidence on the problems experienced and generates insights on most effective responses, “including the place of rights in framing demands and the strategies needed to shift power”.

Third, the project sharpened our thinking about the unique characteristics of legal empowerment with self-employed workers in public space.

The fragmented legal frameworks regulating their work, complex institutional pathways for seeking accountability, and entrenched power imbalances in urban governance challenged us not to hold onto a specific set of legal strategies too closely. Instead, we took a more incremental and adaptive approach. Again, PAR was a particular strength in this regard.

As noted above, vendors do not operate outside of the law; informality is the result of a dense web of inappropriately designed or improperly enforced by-laws, city ordinances, and other regulations. These rules are often outdated, contradictory, and subject to the whims of those in office. This fragmentation enables corrupt, discriminatory or inconsistent enforcement. These challenges are not merely the product of legislative shortcomings or administrative failures; they reflect a broader political project to exclude and marginalize the working poor in order to turn streets into “sanitized spaces for the elites to use and enjoy” (Dinesh et al. 2021:8-9). In seeking to address these challenges, administrative law, constitutional protections, property rights, and municipal governance all come into play. But

the “clear and orderly hierarchy of laws needed to resolve competing claims is often not easy to identify” (Di Giovanni and Bercovich 2025:14).

In this context, it’s not a surprise that vendor organizations grounded their livelihood claims differently. In Zimbabwe, administrative justice offered a compelling narrative for ZCIEA to engage Town Councils on urban governance shortcomings. In Brazil, the right to work and the right to the city struck a chord with UNICAB’s leaders, who used these concepts to assert their legitimacy in public space. In both cases, invoking the law aspirationally, to gain currency politically, was key. Which legal framework to invoke was a strategic choice, to test and learn from – which PAR allowed us to do.

For the most part, vendors don’t have an employer and must engage with the state as the entity exercising the most influence over their working conditions. This fact also differentiates their legal strategies from other workers, who can rely on the institutional framework of labour law. The state has discretionary power to zone, license and police public space. It is responsible for managing competing urban priorities such as order, traffic flow, hygiene, and commercial regulation. But, commonly, local authorities are antagonistic and obstructive to vendors (Marchiori and Bamu 2025: 47). They prioritize the construction of “world class cities” in ways that echo inherited colonial governance regimes (Dinesh et al. 2021:2), rendering public space a site of class struggle (von Broembsen 2024).

This creates a relationship between vendors and the state that may be regulatory in form, but that is politically negotiated in practice – and the political opportunity structures in each location varied considerably. This was another factor demanding flexibility and agility in designing legal strategies. In Zimbabwe, there was a lot more receptiveness from the Town Councils in both Karoi and Plumtree, which meant we could prioritize more cooperative strategies. ZCIEA succeeded in engaging them directly in public forums, building relationships with officials, and putting forward concrete proposals. The challenge, in this context, was to ensure that being invited into official spaces for the first time then translated into meaningful influence. By contrast, UNICAB faced a hostile political climate in São Paulo. So, we needed to adopt more incremental and indirect

strategies for strengthening collective voice, expanding civic space, and building longer-term constituencies for change. This included more confrontational strategies to pressure authorities to comply with international standards. For example, we partnered with the Harvard Human Rights Clinic and other Brazilian NGOs to submit a communication to the UN Special Rapporteur on Extreme Poverty and Human Rights.⁸

At the same time, the fact that vendors are workers – who are part of the organized labour movement – distinguishes them from other community groups using legal strategies to claim their rights. This had two implications. First, it meant that building and mobilizing their membership base – to strengthen their associational power – was a key priority for UNICAB and ZCIEA.⁹ As we learned through the project, achieving this also required focusing on supporting the organizations' leadership. In this regard, a key learning was that legal empowerment cannot be seen as separate from this broader movement-building work; it is important to be intentional about the close interplay between the two. As movement lawyers, we need to be ready to navigate the non-linear and sometimes messy process of organizing, which PAR can help facilitate.

Vendors' status as workers also meant that we could leverage the collective labour rights they are entitled to in international human rights law, as elaborated in international labour standards, in framing demands. These provide stronger procedural safeguards for workers to claim – and bargain for – their rights than broader human rights principles, such as public participation and civic engagement. In this respect, expanding the focus from administrative justice to include R204 was important. R204 affirms that freedom of association and collective bargaining rights extend to all workers in the informal economy, including those who are self-employed, and reiterates states' responsibilities to ensure appropriate regulation, access to public space, and supportive infrastructure. This meant our legal strategies

weren't only focused on supporting workers to resist actions that infringe their rights, they also prioritized efforts to ensure vendors had a seat at the table where they could meaningfully influence policy decisions. ZCIEA, for example, has succeeded in signing Memorandums of Understanding (MoU) with a number of municipalities across Zimbabwe (Mudarikwa and von Broembsen 2024). This project revived discussions about how to advance on signing a new MoU in Karoi and strengthen implementation of the existing one in Plumtree.

What next?

Incorporating PAR into this project allowed us to experiment with a number of innovative approaches: linking administrative justice principles with R204; leveraging data to open dialogue with local authorities about strengthening urban governance; and securing legal assistance for worker organizations by engaging public interest and pro bono lawyers. As described in this brief, this was far from straightforward, and we had successes and challenges with each. Our aim going forward is to synthesize lessons learned from the project into actionable tools that can be used by worker organizations and their supporters in different contexts. Legal empowerment is just as relevant for waste pickers fighting against exclusion from municipal waste management when private companies are contracted to collect recyclables where they operate, and for homeworkers seeking redress for unfair subcontracting practices from factories and the brands purchasing from them, as it is for street vendors and domestic workers.

Scaling out this work – a critical systems change strategy alongside scaling deep and scaling up – involves disseminating a common set of legal empowerment principles and practices through networks of workers in informal employment across sectors and geographies. It also involves building a community of practice among legal support organizations, including public interest law firms, university law clinics, legal aid services, and pro bono programmes that are working

⁸ Between October and December 2025, the Harvard Human Rights Clinic analyzed how the conditions of street vendors in São Paulo violated their human rights. Their analysis, informed in part by our work under this project, included additional interviews with street vendor leaders, human rights organizations and local authorities. In May 2026, they made a submission to the United Nations Special Rapporteur on Extreme Poverty and Human Rights, which exposes how the current system – exclusionary vending authorizations; arbitrary enforcement actions; and the excessive use of force by the military police – results in numerous violations of vendors' rights to work, property, dignity, personal security, life, and non-discrimination.

⁹ Within power resources theory, associational power comes from workers' willingness to engage in collective actions, such as becoming members of an organization, paying dues, participating in campaigns and protest actions, etc. (Schmalz et al. 2018).

alongside organizations of workers in informal employment, in order to pool experience and expertise and build solidarity. Our experiences have convinced us that there is much legal advocacy workers can do themselves. But, on some issues, support from a lawyer, including

representation in court, is an essential part of the legal infrastructure necessary for worker organizing. As these efforts evolve, we would value connecting with others exploring how legal empowerment can strengthen collective action.

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