

Singapore

A joint submission from the Humanitarian Organization for Migration Economics (HOME) & Think Centre for the 24th Session of the Universal Periodic Review (UPR)

I. INTRODUCTION

1. HOME is a non-governmental organization based in Singapore which works for the well-being, justice and empowerment of vulnerable migrant workers. Since 2004, HOME has been providing shelter, legal assistance, training and rehabilitation to migrant workers who are in need.¹

2. Think Centre, an independent non-governmental organisation (NGO) in Singapore. First registered as a business (RCB) on 16 Jul 1999 and today as a society (under ROS) on 20 Oct 2001, the Centre aims to critically examine issues related to political development, democracy, rule of law, human rights and civil society. Think Centre's activities include research, publishing, organising events and networking.

3. As of December 2014, there have been more than 1.3 million migrant workers in Singapore. 73% of these workers are work permit holders who are classified as unskilled or low-skilled workers (See Annex I). These individuals are employed in one of the following sectors: construction, manufacturing, marine, process, domestic or service.²

4. Country of origins of domestic workers: Indonesia, Philippines, Sri Lanka, India, Myanmar, Bangladesh, Thailand, Nepal and Pakistan. Country of origin of other low-wage migrant workers: Malaysia, People's Republic of China, Bangladesh, India, Thailand and Myanmar.

II. REVIEW OF SINGAPORE'S 2011 REPORT

5. In Singapore's 2011 National Report the government asserted that migrant workers, with the exception of Migrant Domestic Workers, are protected under the Employment Act (EA) which carries stipulations pertaining to maximum working hours, overtime payments, authorised salary deductions and frequency of salary payments.³

6. The State-under-review claimed that migrant domestic workers are protected under the Employment of Foreign Manpower Act (EFMA) which provides more extensive coverage of foreign workers' issues and requires employers to provide proper accommodation, timely payments and sufficient food and rest.⁴

7. These existing frameworks meant to protect low-skilled migrant workers are theoretically sound but lacking in practical application. This report reviews the recommendations that Singapore supported in the previous UPR cycle and demonstrates that there continue to be shortcomings in the implementation of these recommendations.

8. Singapore supported the following recommendations following the 2011 UPR:

- **Recommendation 94.3 and 94.5⁵:** Ensure universal access to health services and continue efforts in providing health care.
- **Recommendation 94.16⁶:** Protect the rights and improve the working conditions of migrant domestic workers and promote their human rights.
- **Recommendation 94.13 and 94.14⁷:** Strengthen efforts to protect migrant workers' rights.

- **Recommendation 94.17**⁸: Singapore's cooperation is required with countries of origin so that migrant workers are better protected from exploitation.
- **Recommendation 94.15**⁹: improve legislation to better protect the dignity and safety of migrant workers.
- **Recommendations 94.18**¹⁰, Contribute to the efforts of neighbouring countries to combat trafficking in humans

III. BACKGROUND AND FRAMEWORK

9. Singapore is not a party to the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social, and Cultural Rights, the International Convention on the Protection and the Rights of All Migrant Workers and Members of Their Families or the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children Supplementary to the United Nations Convention against Transnational Organized Crime.

10. Singapore is a party to the following relevant conventions: the Convention on the Rights of the Child and the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), however it has made a number of reservations to both. The country is a member of the International Labour Organization and has ratified twenty of the conventions. However it has not ratify the core ILO Conventions C87, C105 and C111. As a net migrant labour receiving country, it has not ratify the relevant international instruments protecting the rights of migrant workers: ILO C97 Migration for Employment Convention (Revised), ILO C143 Migrant Workers (Supplementary Provisions) Convention, and ILO C189 on Convention on Decent Work for Domestic Workers.

IV. PROMOTION AND PROTECTION OF HUMAN RIGHTS ON THE GROUND

Equality and Non-discrimination

11. Wage discrimination

Discrimination in wages by nationality is rampant, debunking the State's claim of meritocracy. All low-wage migrant workers are paid less than local workers. Low-wage South Asian workers in all sectors of the economy are paid less than workers of all other nationalities. Domestic workers from the Philippines are paid the most, followed by other nationalities. Research by HOME has shown that migrant domestic workers from Myanmar and Indonesia receive an average monthly wage of S\$474 and S\$576 respectively, and are among the least paid among the surveyed nationalities. As an unequal wage structure is not a statutory offence, there is no legal recourse for the discriminated worker. Wage discrimination, and low wages led to a strike by over 200 bus drivers from China in 2012.¹¹The State was quick to penalize the drivers and sentence them to jail for instigating and participating in the strike.

12. Recommendation:

- Review the practice of wage discrimination by nationality and take steps to address the issue.
- Ratify ILO C111.

Right to life, liberty and security of the person

13. For immigration offences such as overstaying, migrants may be jailed and/or caned.¹² Even during instances when a migrant worker ends up overstaying unintentionally, as a result of being deceived by agencies and employers, there is a possibility that they will be subjected to such dehumanising corporal punishment. Trafficked victims can also be put on trial and caned for immigration offences, regardless of their victim status.

14. Despite the creation of Singapore Inter-Agency Task Force on Trafficking in Persons in 2010 and the Prevention of Human Trafficking Bill in 2014, the US Department of State has placed Singapore in Tier 2 in its annual TIP report as the country remains a destination for women and girls subjected to sex trafficking, and for men working in the fishing and boating industry subjected to forced labour. While the bill against human trafficking covers many aspects, there are many problem areas. In particular, the protection and assistance offered to victims is not adequate and sufficient. The government fails to recognise elements of trafficking in cases without physical confinement or abuse; there are limited efforts to prosecute and convict traffickers and it lacks transparency regarding on-going cases, which interferes with service providers' ability to assist victims. (WGUPR 94.18)

15. *Recommendation:*

- Strengthen the protection and assistance to victims of trafficking by ensuring they have adequate social support and the right to work.
- Ratify the Palermo Protocol.
- Define all the key indicators of human trafficking in the Palermo Protocol clearly in the Prevention of Human Trafficking Act (e.g. forced labour).
- Ratify the UN CRSR and its Protocol.

Administration of justice

16. While legal mechanisms exist for migrant workers to seek redress for claims, there are many challenges that limit a worker's ability to seek access to justice. In spite of Singapore supporting the recommendation that calls for it to strengthen the protection of migrant workers' rights, the existing legislation is weakly enforced, inadequate in its provisions and discriminatory. Migrant workers covered by the Employment Act continue to be routinely denied overtime pay, annual leave, paid sick leave and protection from wrongful dismissals. Those whose salary claims are brought to a labour court find it costly to enforce court orders when employers refuse to pay and many return home empty handed. Workers who wish to pursue claims against employers are often also forcefully repatriated without access to justice. Aggrieved workers also do not have the right to switch employers freely because Singapore's work pass system is similar to the *kafala* system used in the Middle East. This makes migrant workers vulnerable to forced labour. Often workers are also forcefully repatriated without access to justice, by employers and hired thugs. (WGUPR 94.13, 14 and 16)

17. Migrant domestic workers and other low-skilled migrant workers often have no guarantee for basic survival once they lodge a complaint against their employers. Waiting time for processing a complaint may range from several weeks to as long to two-and-a-half years. The Employment of Foreign Manpower Act holds employers responsible for providing housing and food to workers during this interim period. However, HOME has documented many cases in which employers forcefully evict their employees and do not provide for their subsistence while

they wait for their complaints to be processed. Even when employers are obliged to house workers, they tend to make life very hard for these workers and use pressure and intimidation to persuade workers to withdraw the case.

18. Following the Little India riot 53 workers were deported without the right to be heard and represented by counsel and 200 were issued police advisories (**See Appendix V**). These developments exposed a recurring weakness in the local administration of justice to migrant workers. There is a discordant gap between Singapore laws and international standards in the treatment of migrant workers.

19. When migrant workers are arrested, they may be uninformed of their right to make a phone call or gain access to the services of a language translator; hence, they may be disadvantaged in communication and may not get help from a lawyer, a NGO or an embassy representative.

20. *Recommendation:*

- Review the current process for migrant workers who are making claims for salaries to ensure they are rightfully compensated.
- Proactively investigate employers who violate Employment Act standards and prosecute them accordingly.
- Strictly enforce existing legislation to ensure that employers provide adequate housing and food while workers are pursuing their claims.
- Implement a system to allow workers who are pursuing salary and other employment related claims to work elsewhere as a means of supporting themselves.
- Review the system that undermines a migrant worker's ability to switch employers freely, with the goal of liberalising it further.
- Allow for greater transparency in the repatriation processes as a way of protecting migrant workers against arbitrary deportation.

Right to privacy, marriage and family life

21. To obtain and keep their work permits, migrant workers and migrant domestic workers are required to pass a medical examination for pregnancy and infectious diseases by a registered doctor within 14 days of arrival and periodically during employment.¹³ Employers can obtain a copy of the report directly from the doctor without a worker's consent, or regard for their right to privacy.

22. If migrant workers are found pregnant, they face termination of work, deportation and difficulties re-entering Singapore for work in the future.¹⁴ The Ministry of Manpower repatriates 200 migrant domestic workers yearly for pregnancy.¹⁵ The reported cases of abortion are far lower than the actual number for many cases go unreported. Many migrant workers secretly terminate their pregnancies by dangerously self-administering abortion drugs.¹⁶ In 2014, HOME witnessed around 20 cases of migrant domestic workers who suffered from serious health problems as a result of failed abortions. Workers are denied their right to have a family.

23. Work permit holders are not allowed to marry Singaporean citizens or permanent residents without permission from the Ministry of Manpower.¹⁷ Workers who do so might not be allowed to enter or stay in Singapore.¹⁸ This rule impinges on a worker's right to marriage.

24. *Recommendation:*

- Respect a migrant worker's right to privacy and ensure employers are not granted direct access to workers' medical reports without their permission.
- Review the practice of deporting and blacklisting pregnant migrant workers.
- Allow pregnant migrant domestic workers to continue their pregnancy in their home country before returning to Singapore to work.
- Recognise the right of all to enter into marriage and eliminate the need for a migrant worker to seek permission from the Ministry of Manpower and/or other immigration bodies prior to being able to legally marry a Singaporean or Permanent Resident.

Freedom of Movement

25. Migrant domestic workers are required to live with their employers, which makes them especially prone to confinement, isolation, and physical and sexual abuse with no opportunities to exercise freedom of movement. HOME's research indicated that at least 73% of migrant domestic workers experienced restrictions on communication and at least 74% experienced restrictions on movement by their employer or employer's family.¹⁹

26. HOME has seen many cases of forced confinement. Employers are known to hire 'repatriation' companies to do this. For example, UTR Services Pte Ltd repatriates an average of 2000 workers per year.²⁰ Various extra-legal methods of intimidation and coercion have been used by repatriation companies, including locking workers up and confiscating their mobile phones such that they are unable to seek help.²¹ Any act to wrongfully restrain or confine foreign workers is criminalised in the Penal Code. The government, however, does not regulate repatriation agencies.

27. The Employment of Foreign Manpower Act and Passports Act forbid employment agencies and employers from holding on to a worker's identity documents. Regardless, employment agencies and employers tend to confiscate and retain migrant workers' travel and identity documents, in a manner that infringes on their freedom of movement, and are rarely punished for these violations. For example, HOME's research among domestic workers indicated that 67% of migrant domestic workers were not in possession of their passports, and 60% did not have their employment contracts.²² This issue is linked to employers' concerns about recovering their S\$5000 security bond²³, which makes employers responsible for their migrant domestic worker's conduct.

28. *Recommendations:*

- Review the possibility of allowing domestic workers to live out of the employer's home.
- Proactively investigate and prosecute employers, agents and other parties for confining workers.

- Educate employers and agents to better protect the rights of migrant workers to hold their own passports and identity documents.

Freedom of religion or belief, expression, association, and peaceful assembly, and right to participate in public and political life

29. Migrant domestic workers without a mandatory day off are unable to attend religious worship. These workers have also reported that they have been forbidden by their employers from praying and fasting. Employment agencies, at times, confiscate workers' religious items and insist that they abandon their religious practices, such as refraining from eating certain foods and praying, to make them more employable.

30. According to the *Trades Union Act*, migrant workers are deprived of the right to organise and collectively bargain even as they are legally barred from serving as trade union officers, trustees or staff without approval by the Ministry of Manpower

31. *Recommendations:*

- Ensure a worker's freedom to practice a religion is not compromised at any cost and that they can do so without fear of repatriation and reprisal.
- Ensure that a migrant worker's freedom of expression and association, and the right to participate in all aspects of civic and political life are respected.
- Ratify ILO C87 and allow migrant workers to have the ability to form their own unions.

Right to work and to just and favourable conditions of work

32. Migrant domestic workers, who are not covered by the Employment Act which provides for basic labour conditions, have to work unregulated hours and are not entitled to official sick leave, overtime pay and public holidays.

33. Although the law stipulates that migrant domestic workers are entitled to a rest day or compensation in-lieu, there is no genuine choice available for these workers due to their lack of bargaining vis-a-vis their employers. The law also does not guarantee them the right to 24 hours of rest on their day off. The government leaves it to the worker to negotiate it with the employer. HOME has received many complaints from workers who only have a few hours off on their rest days. When faced with pressure from employers to work seven days a week, migrant domestic workers also cannot exercise their right to a day off. 40% of the 670 migrant domestic workers surveyed by HOME revealed that they did not have a weekly day off.²⁴ Those who assert their right to a weekly day off run the risk of losing their job.

34. On top of regular rest days, sufficient rest time on a daily basis is important for migrant domestic workers' wellbeing. HOME's research revealed that on average migrant domestic workers work more than 13 hours a day and many workers are expected to work between 16-18 hours.²⁵

35. Even low-skilled migrant workers who are covered by the Employment Act are pressured to work 12-16 hours a day, 7 days a week. This is a result of poor enforcement of legislation that stipulates that workers should not have to work more than 72 hours of overtime per

month.²⁶ HOME has dealt with complaints from construction workers who reported being made to work without weekly rest days.

36. Singapore's cooperation is required with countries of origin so that migrant workers are better protected from exploitation. Although Singapore's Employment Agencies Act limits recruitment fees to just two months, there are still widespread reports of migrant workers being exploited through excessive recruitment fees amounting up to USD8000 per worker. Singapore does not respect laws which protect the nationals of sending countries going abroad; therefore, contract substitution and illegal collection of exorbitant recruitment fees are rampant. (WGUPR 94.17)

37. Right to transfer denied and limited redress when wrongfully dismissed - existing regulations require migrant domestic workers and construction migrant workers to obtain a letter of consent from their employers before transferring between jobs. Workers from other sectors do not have the option to request a letter of consent even. This system limits job mobility and has led to conditions of forced labour and exploitation. HOME notes that most employers choose to repatriate their workers than permit them to switch jobs. Employers can also unilaterally cancel a work permit and repatriate the worker as soon as they learn that a complaint has been filed, or to prevent a complaint from being filed. Workers may not be informed of the termination of their work permits until just before they are sent home.

38. *Recommendations:*

- Ratify ILO C105 and review existing labour protections of Migrant Domestic Workers, with the aim of ensuring they are offered protection comparable to other workers, e.g. ensuring a weekly 24-hour rest day.
- Ratify ILO's convention on Domestic Workers (C189) and bring domestic workers under the protection of the Employment Act.
- Proactively investigate employers who violate Employment Act standards and prosecute them accordingly.
- Establish a framework of cooperation with countries of origin, and review existing local legislation to ensure migrant workers have not paid excessive recruitment fees in the country of origin and country of destination.
- Review the system whereby migrant workers are not allowed to switch employers freely, with the view of liberalising it further.

Right to social security and to an adequate standard of living

39. Migrant domestic workers are excluded from the Work Injury Compensation Act²⁷. While migrant domestic workers are covered by compulsory medical insurance in the event of an accident, the extent of coverage and benefits are less favourable than that of other low-paid manual workers covered by the Work Injury Compensation Act. (WGUPR 94.3 and 94.5)

40. Even though the law requires employers to pay their workers "the gross rate of pay" for every day of sick leave ("excluding any allowance payable" if not hospitalised),²⁸ this is poorly enforced in practice. Employers tend to bring their injured and unwell workers to private doctors and dictate that these doctors give workers less sick leave than what they require for a full recovery (See Annex II, III and IV).

41. Current laws allow employers to have discretion over whether their workers get medical treatment when necessary. The Ministry of Manpower stipulates that employers are liable to pay for medical treatments deemed “immediately medically necessary”.²⁹ In HOME’s experience, due to the lack of proper definition of “immediately medically necessary” there have been multiple instances of doctors hesitating to classify treatment and procedures as such and employers capitalize on this to evade responsibility for their employees’ medical upkeep, often deporting them once they find out they are unwell. HOME’s research revealed that only about half (54%) of surveyed migrant domestic workers received adequate medical attention and less than half (43%) adequate dental attention by their employer. In addition, 13% of the surveyed migrant domestic workers were not allowed to see a doctor by their employers, and 30% of the migrant domestic workers were not allowed to see a dentist.³⁰

42. Many low-skilled migrant construction workers are housed in overcrowded, cramped, unhygienic and poorly ventilated living quarters; squalid housing conditions pose significant safety hazards as evident from incidents such as dorm fires that have broken out in recent years (**See Annex VII**). The Foreign Employment Dormitories Bill introduced on 20 Jan 2015, that imposes new standards of “public health and safety, security and public order” on foreign workers’ dormitories, only applies to large dormitories with 1,000 beds or more.³¹ As such, dormitory operators might build smaller dormitories to escape the Bill’s regulations.³²

43. Regulations stipulating accommodation standards for live-in domestic workers are vague, resulting in many of them sleeping in places such as kitchens, living rooms, and storerooms with no privacy.

44. 80% of migrant domestic workers who seek help from HOME do not receive sufficient food. Research by HOME also revealed that 13% of interviewed migrant domestic workers never received food that was religiously and culturally appropriate.³³ Many foreign construction workers do not have hygienic cooking facilities and catered meals are often damaging to their health. The catered meals often go bad due to early delivery and poor storage, and the meals’ costs are often deducted from workers’ salaries (**See Annex VI**). Regulations stipulating that migrant workers receive adequate and nutritious food are vague and, hence, poorly enforced. As a result, workers who do not have sufficient and nutritious meals have ineffective avenues of redress.

45. *Recommendations:*

- Include migrant domestic workers in the Work Injury Compensation Act
- Give migrant domestic workers their entitlement to paid sick leave.
- Strictly enforce employers’ obligation to provide medical treatment to migrant workers. Review laws and regulations that call for immediate and automatic deportation of a migrant worker on health grounds.
- Provide treatment on a right to health basis and ensure migrant workers have easy access to comprehensive and affordable health services.
- Introduce clear and enforceable minimum standards of accommodation for migrant domestic workers.
- Ensure all migrant workers are housed according to internationally accepted standards, such as the standards stipulated by the International Labour Organisation.

- Refine current legal requirements for employers to provide “adequate food” and provide clearer guidelines on what it entails.

Migrants, Refugees and Asylum Seekers

46. While Singapore is not a state party to the 1951 United Nations Convention relating to the Status of Refugees (CRSR), it is required to respect the principle of non-refoulement by international customary law. However, there are no domestic laws that provide for the granting of refugee status and Singapore remains a closed country to those in need. In 2015, when Rohingya and Bangladeshi refugees were stranded in the Andaman Sea Singapore’s government officials maintained their position on non-admittance of refugees on the basis of limited land and natural resources (**See Annex VIII**).

47. The government classifies persons who overstay their visas as irregular migrants even though they meet the criteria to be considered refugees; there is limited access to any specific procedure for redress.

48. *Recommendations:*

- Ratify the UN CRSR and its Protocol.
- Introduce provisions that address the issue of refugees in the region and how help can be extended to them.

¹ 'HOME's Mission and Vision,' <http://home.org.sg/mission-vision/>

² 'Skilled and semi-skilled workers,' <http://www.mom.gov.sg/passes-and-permits>

³National Report, No. 99,

http://www.mfa.gov.sg/content/dam/mfa/images/media_center/special_events/upr/UPR%20National%20Report_Singapore.pdf

⁴National Report, No. 100,

http://www.mfa.gov.sg/content/dam/mfa/images/media_center/special_events/upr/UPR%20National%20Report_Singapore.pdf

⁵ 94.3. Continue applying programmes and measures aimed at ensuring universal access of its population to its excellent educational and health services and maintain the highest possible quality of these services (Cuba); 94.5. Continue its efforts in providing health care (Saudi Arabia). Report of the Working Group on the Universal Periodic Review [Singapore], 2011 Recommendations.

⁶94.13. Continue its efforts in protecting the rights of specific groups such as women, children, the disabled, the aged and migrant workers (Brunei Darussalam);

94.14. Continue to strengthen efforts to protect the rights of foreign workers (India);

94.16. Continue to strengthen measures to promote the human rights of migrant domestic workers, including by seeking to further improve working conditions of domestic workers in Singapore (the Philippines). Report of the Working Group on the Universal Periodic Review [Singapore], 2011 Recommendations.

⁷94.13. Continue its efforts in protecting the rights of specific groups such as women, children, the disabled, the aged and migrant workers (Brunei Darussalam);

94.14. Continue to strengthen efforts to protect the rights of foreign workers (India);

94.16. Continue to strengthen measures to promote the human rights of migrant domestic workers, including by seeking to further improve working conditions of domestic workers in Singapore (the Philippines). Report of the Working Group on the Universal Periodic Review [Singapore], 2011 Recommendations.

⁸94.17. Consider enhancing cooperation with countries of origin of migrant workers including on refining the process aimed at protecting such workers from exploitation, with a view to better managing the broad range of challenges in dealing with migrant workers (Malaysia). Report of the Working Group on the Universal Periodic Review [Singapore], 2011 Recommendations.

⁹94.15. Continue efforts in protecting the dignity and safety of migrant workers, including through appropriate institutional and legislative measures (Nepal)

¹⁰94.18. Continue its positive engagement with neighbouring countries in combating trafficking in persons (Indonesia); continue the positive participation and coordination with neighbouring countries in the context of combating trafficking in human beings (United Arab Emirates). Report of the Working Group on the Universal Periodic Review [Singapore], 2011 Recommendations.

¹¹Yahoo News (2012). "SMRT Bus Drivers' Strike Illegal: Tan Chuan Jin," <https://sg.news.yahoo.com/-over-100-chinese-bus-drivers-in-s-pore-go-on-strike-105924025.html>

¹²Immigration Act, Chapter 133, Part II "Entry into and departure from Singapore," <http://statutes.agc.gov.sg/aol/search/display/view.w3p;ident=d38838ed-8dab-4983-85f3b6dad7043aa0;page=0;query=DocId%3A%22d0fd4d9d-0e2f-462f-a0df0df7ecdc86d1%22%20Status%3Ainforce%20Depth%3A0;rec=0#pr5-he->

13 'Medical Examination.' <http://www.mom.gov.sg/passes-and-permits/work-permit-for-foreign-domestic-worker/eligibility-and-requirements/medical-examination>

¹⁴Employment of Foreign Manpower Act (Chapter 91A), Fourth Schedule, Part VI, Point 7.

¹⁵ Today (2013). 'Pregnancy Leave,' <http://www2.tnp.sg/content/pregnancy-leave>.

¹⁶The Straits Times (2014). 'Taking medicine illegally sold online can kill you,' <http://news.asiaone.com/news/singapore/taking-medicine-illegally-sold-online-can-kill-you?page=0%2C2>

¹⁷Employment of Foreign Manpower Act (Chapter 91A), Fourth Schedule, Part VI, Point 6.

¹⁸ The New Paper (2015). 'Tough for transient workers to marry Singaporeans,'

<http://news.asiaone.com/news/singapore/tough-transient-workers-marry-singaporeans>

¹⁹ HOME (2015). 'Home sweet home? Work, life and well-being of foreign domestic workers in Singapore.' <http://home.org.sg/research/home-sweet-home-work-life-and-well-being-of-foreign-domestic-workers-in-singapore/>

²⁰Yahoo News (2011). 'Missing migrant workers hunted down in Singapore,' <https://sg.news.yahoo.com/missing-migrant-workers-hunted-down-singapore-032501556.html>

²¹The Online Citizen (2011). 'Repatriation companies – Manpower Minister's response belittles the efforts of migrant workers,' <http://www.theonlinecitizen.com/2011/11/repatriation-companies-manpower-ministers-response-belittles-the-efforts-of-migrant-workers/>

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- ²² HOME (2015), 'Home sweet home? Work, life and well-being of foreign domesticworkers in Singapore.' <http://home.org.sg/research/home-sweet-home-work-life-and-well-being-of-foreign-domestic-workers-in-singapore/>.
- ²³Employment of Foreign Manpower (Work Passes) Regulations 2012, First Schedule, Part I, Section 4. <http://www.mom.gov.sg/Documents/services-forms/passes/WPSPassConditions.pdf>
- ²⁴HOME (2015). 'Home sweet home? Work, life and well-being of foreign domesticworkers in Singapore,' <http://home.org.sg/research/home-sweet-home-work-life-and-well-being-of-foreign-domestic-workers-in-singapore/>.
- ²⁵HOME (2015). 'Home sweet home? Work, life and well-being of foreign domesticworkers in Singapore,' <http://home.org.sg/research/home-sweet-home-work-life-and-well-being-of-foreign-domestic-workers-in-singapore/>
- ²⁶MOM, 'Hours of Work, Overtime and Rest Days.' <http://www.mom.gov.sg/employment-practices/hours-of-work-overtime-and-rest-days>.
- ²⁷ 'Are FDWs covered under the Work Injury Compensation Act?' <http://beta.mom.gov.sg/faqs/work-permit-for-fdw-faqs/are-fdws-covered-under-the-work-injury-compensation-act>
- ²⁸Employment Act, Section 89, Point 5.
- ²⁹'Employer Medical Obligations For Foreign Workers,' http://www.mom.gov.sg/~//media/mom/documents/servicesforms/passes/employer_medical_obligations_-_fdw.pdf
- ³⁰HOME (2015). 'Home sweet home? Work, life and well-being of foreign domestic workers in Singapore,' <http://home.org.sg/research/home-sweet-home-work-life-and-well-being-of-foreign-domestic-workers-in-singapore/>
- ³¹Tan, Chuan-Jin, (2015). 'Foreign employee dormitories bill second reading speech' (speech given at Parliament).
- ³² The Straits Times(2015). 'Tighter rules: Why stop at large dorms?' <http://www.straitstimes.com/premium/forum-letters/story/tighter-rules-why-stop-large-dorms-20150123>
- ³³ HOME (2015). 'Home sweet home? Work, life and well-being of foreign domestic workers in Singapore,' <http://home.org.sg/research/home-sweet-home-work-life-and-well-being-of-foreign-domestic-workers-in-singapore/>