

## What plagues the migrant worker

*This article, by TWC2 volunteer Meera Rajah, was written in October 2014. For unclear reasons we never published it; perhaps it was simply overlooked. It's been five years, but everything she writes about is still the case today.*

### Introduction

The protection of low-wage migrant workers is a Gordian knot that lies at the very heart of the Singaporean economic model. The construction, shipyard and manufacturing industries are bulwarks of the Singapore economy. Domestic workers offer 'indispensable' service and convenience in the operation of our daily lives. Much of this success is owed to the transient workers, who form the vertebrae of these sectors.

The most recent statistics indicate that there are over 321,000 and 218,000 workers in the construction and domestic work industries respectively<sup>1</sup> – they constitute approximately one-third of the non-residents in Singapore<sup>2</sup>. The total number of Work Permit-holders in Singapore constitutes about one-fifth of Singapore's total population<sup>3</sup>. Work-permit holders, who need no 'minimum' qualifications, are owed no 'minimum' pay either. Volunteers at Transient Workers Count Too (TWC2) encounter workers who receive as little as S\$1.50 per hour for their toil and sweat.

The individuals that I have met over the past month reveal an epidemic of poor treatment towards the migrant worker community – manifest in the form of work injury and salary disputes. The inequality of bargaining power goes beyond that "which is inherent, and must be inherent in every employment relationship"<sup>4</sup>. Maltreatment of these individuals not only causes them emotional and physical distress, but also exacerbates existing cultural tensions, creating social costs that the taxpayer must bear. The benefits are privatised, but some of the costs are socialised: relationships within the greater Singapore community are damaged. Many of these migrant workers are reluctant to report abuse out of fear of losing their livelihood and having to leave Singapore.

In this article, I will first briefly explore how migrant workers find their way to Singapore and the dynamics of the worker-employer relationship. I will then reflect on common problems that these

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<sup>1</sup> See the Ministry of Manpower (MOM), "Foreign Workforce Numbers" <<http://www.mom.gov.sg/statistics-publications/others/statistics/Pages/ForeignWorkforceNumbers.aspx>> Accessed 12 September 2014, 16:42.

<sup>2</sup> See Department of Statistics Singapore, "Population and Population Structure".

<[http://www.singstat.gov.sg/statistics/browse\\_by\\_theme/population.html](http://www.singstat.gov.sg/statistics/browse_by_theme/population.html)> Accessed 12 September, 16:48.

<sup>3</sup> See MOM (n 1) and Department of Statistics Singapore (n 2).

<sup>4</sup> P. Davies and M. Freedland, *Kahn-Freund's Labour and the Law* (3<sup>rd</sup> Edn, Stevens & Sons, 1983), 18.

workers face – namely, work injury cases, salary disputes and abuse – and their reluctance to report them, which in turn creates deeper social repercussions.

## The recruitment of foreign labour

Globalisation, technological advances and New Capitalism<sup>5</sup> have created dramatic new social and economic inequalities, exacerbating the rich-poor gap between Singaporeans and the migrant workers from our neighbouring Asian countries. The workers, hail from a wide range of countries including Bangladesh, India, Myanmar, China, Thailand and the Philippines. In the 21<sup>st</sup> century, travel is easy. They touch down on the tarmac in the hope of creating a better life, only to have their rose-tinted lenses shattered.

The vast majority of these workers find their way to Singapore through job agents in their homeland. These job agents make unrealistic promises that the workers have no real means of verifying and request exorbitant sums ‘in return’ for their ‘services’.

For instance, I recently interviewed two workers from North India (Haryana and Chandigarh respectively)<sup>6</sup> who disclosed how their agents had ‘estimated’ that they would earn a figure between \$1,200 to \$2,000 per month. The agents ‘in turn’ requested a ‘commission’ of \$6,000. In reality, Mr Ishwar’s first salary was \$700 per month – approximately half what his agent had ‘guaranteed’ – while Mr Pardeep’s first pay was a mere \$245. In the latter’s case, the company had no work to be done for half of his first month, and he was only paid *pro rata* for his services.

The difficulty in attracting local workers is one of the reasons why the wages and treatment of workers in the aforementioned sectors remains inadequate. As Linda Lim recently observed, construction, domestic service and the food and beverage (F&B) industry are three sectors in Singapore “that are labour intensive, are usually considered low-wage, low-skilled, and low-productivity jobs that Singaporeans ‘don’t want to do’... More money alone cannot compensate for [the] lack of respect [associated with these sectors in Singapore]”<sup>7</sup>.

## Exploring the dynamics of the worker-employer relationship

The fact that the employment relationship itself is primarily contractual reinforces the subordination of the employee. What we might call the ‘agreemental’ aspect of contract is not as prevalent in employment as it is in commercial relationships<sup>8</sup>. There is often an asymmetrical relationship characterised by an inherent inequality of bargaining power<sup>9</sup>. In reality, the worker, particularly when unskilled, is compelled by his economic circumstances to accept terms on a ‘take it or leave it’ basis<sup>10</sup>. Not only is the employer free to terminate the employment at will, the worker bears the burden of *at*

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<sup>5</sup> A phrase coined by the Confederation of British Industry’s Director General, Richard Lambert, in reference to the growth of private equity and hedge funds. He believes that this innately mobile and complex capital has fueled the growth of income inequality.

<sup>6</sup> See M. Rajah, “Low salary, no overtime and injured, but they like Singapore”. <<http://twc2.org.sg/2014/09/26/low-salary-no-overtime-and-injured-but-they-like-singapore/>> Accessed 28 September 2014 12:32.

<sup>7</sup> L. Lim, ‘How Land and People Fit Together in Singapore’s Economy’ D. Low and S.T. Vadaketh, *Hard Choices* (NUS Press Singapore, 2014), 36.

<sup>8</sup> S. Honeyball, *Great Debates: Employment Law* (Palgrave Macmillan, 2011).

<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

*least* earning back the ‘commission fee’ he has paid his agent (more likely than not, a few thousand dollars) or leaving his family in an even more precarious pecuniary situation than before he left.

This inequality is aggravated by (i) the fact that many workers have an insufficient grasp of the English language, (ii) different cultural expectations and (iii) the ‘flexibility’ of their work.

First, the inadequacy of their language skills translates into a lack of awareness of their existing rights. Workers sometimes do not know *how* or *where* to report verbal and physical abuse, or how to file a complaint for the non-payment of salary. This leaves them ‘voiceless’ and powerless in the hands of unethical supervisors and/or employers.

Secondly, the cultural ‘mismatch’ means that many workers do not fully comprehend the importance of documentary evidence – in Bangladesh and India, they are accustomed to taking their supervisors’ words at face value due to the difficulties with enforcing what is said on paper at a government level. For example, when I met two workers facing a salary dispute, one of them, Mr. Rafiqul, had no salary slips on hand. He tried to recall where they were and deduced that they must be in his dormitory room. Understandably, a lack of documentary evidence on hand creates further difficulties for workers attempting to pursue their claim at a statutory level, diminishing their chances of success.

Thirdly, migrant workers have a contingent employment status: their work permits could be revoked at any time, at their employer’s whim. Mr. Kalam, a Bangladeshi worker, cites how a colleague who witnessed his work accident was sent back to Bangladesh before he could testify – despite the fact that the colleague had given the supervisor and employer no other reason to dismiss him.

## The problems migrant workers face

The most common problems that migrant workers face appear to be (i) work injury cases, (ii) salary disputes, and (iii) abuse. I will address each in turn.

### (i) Work injury cases

In 2013, the TWC2 Cuff Road Food Programme served 105,553 free meals to migrant workers unable to work and in need of help, waiting for their disputes to be addressed<sup>11</sup> - of the workers attended to, 81.3% were injury cases<sup>12</sup>.

A common cause of workplace injuries is the supervisor and/or employer’s disregard for safety regulations and the standard industry practice. A good example would be Mr. Shahadat<sup>13</sup>. He was asked to carry a 35-kilogram pipe, 3-inches in width, and 10-kilograms over what he was recommended to carry in the compulsory safety course. If any worker voiced safety concerns, the supervisor would “[respond] ‘You, young man, why can you only carry 20 kg? Thin man carry – you cannot. Why?’”. His colleague, Mr. Monirul, reflected, “Some carry 50 kg”.

Workers can face particular difficulty in *proving* their injury, should they choose to seek compensation for their injury and/or medical leave wages under the Work Injury Compensation Act (WICA). It is not

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<sup>11</sup> Webmaster, TWC2, “Cuff Road Project 2013: Statistics” <<http://twc2.org.sg/2014/04/06/cuff-road-project-2013-statistics/>> Accessed 13 September 16:55.

<sup>12</sup> *ibid.*

<sup>13</sup> See M. Rajah, “Shahadat’s safety sacrificed at the altar of profit”. <<http://twc2.org.sg/2014/08/24/shahadats-safety-sacrificed-at-the-altar-of-profit/>> Accessed 13 September 17:00.

uncommon for supervisors and/or employers to delay treatment, or to intimidate witnesses against testifying.

In Mr Alam's case<sup>14</sup>, 'the boss' insisted on accompanying the witness, Mr. Ruman, to the Ministry of Manpower (MOM). The circumstances inevitably cast doubt on how honest the witness could have been. Mr Alam's claim was ultimately denied. His employer had refused to compensate him for the treatment for his "backbone injury" at Tan Tock Seng Hospital, and he was unable to recover any of the amount.

This is further complicated by the fact that the workers may not be able to speak to their doctors directly. This renders their doctors unable to verify the worker's account of what happened. A TWC2 survey in 2013 revealed that approximately one in three injured workers finds that it is the boss or company representative who tells the doctor what caused the injury<sup>15</sup>.

## (ii) Salary disputes

A few months ago, TWC2 surveyed a total of 328 foreign workers and discovered that (a) one-third of them were not paid what they were due and (b) another one-third thought that they were paid correctly but had no real means to check<sup>16</sup>.

Although the law requires that a worker must be given his basic salary by the 7<sup>th</sup> day of the month and pay for any overtime work by the 14<sup>th</sup> day of the month<sup>17</sup>, it does not – at present – require a pay-slip that shows clear computation or payment directly through a bank. Thus, workers can be left in a situation where they are not paid, their overtime is under-recorded and/or illegal deduction are made from their pay.

The said illegal deductions are often thinly-guised under the name of 'savings money' or 'renewal money'. The former ('savings money') refers to employers' claims that they are 'helping' the worker 'save' an arbitrary amount, to be returned in full "when go home time"<sup>18</sup>. Of the 77 workers who reported this during the course of the survey, the amounts ranged between \$16 to \$300<sup>19</sup>. A later survey, of nearly three hundred different migrant workers, revealed that 40% had a 'savings money' deduction imposed upon them<sup>20</sup>. The latter ('renewal money') refers to employers charging the workers for the renewal of their work permits. For instance, when interviewed, Mr. Ishwar recalled paying the first company he worked for S\$800 to renew his work permit for another two years.

Proof may, once again, prove difficult, from the worker's perspective. The dispute often boils down to the worker's word against his supervisor and/or employer's, particularly when his pay-slip is withheld. Even if in possession of his pay-slip, the worker would be ill-tasked to prove that he has not, in fact,

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<sup>14</sup> B. Wong, "Alam's disappearing accident". <<http://twc2.org.sg/2014/02/18/alams-disappearing-accident/>> Accessed 13 September 2014, 17:10.

<sup>15</sup> Webmaster, TWC2, "Who said what to the doctor?" <<http://twc2.org.sg/2013/12/06/who-said-what-to-the-doctor/>> Accessed 13 September 2014, 17:17.

<sup>16</sup> Webmaster, TWC2, "One third of male migrant workers aren't paid what they're due". <<http://twc2.org.sg/2014/07/08/one-third-of-male-migrant-workers-dont-get-paid-what-theyre-due/>> Accessed 13 September 2014, 17:24.

<sup>17</sup> ss. 21(1)-(2) Employment Act (Chapter 91), Revised Edn. 2009.

<sup>18</sup> Webmaster, "One third of male migrant workers aren't paid what they're due" (n 14).

<sup>19</sup> *ibid.*

<sup>20</sup> Webmaster, TWC2, "26 to 40 percent of male workers suffer illegal 'savings money' deduction". <<http://twc2.org.sg/2014/09/10/26-to-40-percent-of-male-workers-suffer-illegal-savings-money-deduction/>> Accessed 13 September 2014, 18:12.

been paid the amount that his pay-slip states he has been. It is not uncommon for the pay-slips to state an a salary figure different from what the worker actually receives.

It is interesting to note that deductions for catering are – as of now – not yet illegal. The regulations mandate that employers provide for the “upkeep” and “maintenance” of their workers<sup>21</sup>, but do not expressly proscribe employers from deducting a ‘catering fee’ from their workers’ salaries. This places migrants like Mr. Rafiqul in a difficult position. Even while waiting his salary dispute to be resolved, with no source of income and owed three months of pay, he was charged a \$125 ‘catering fee’ per month. This amounts to approximately a quarter of his original salary.

### (iii) Abuse

The abuse that migrant workers face may be physical or verbal. TWC2 encounters instances where migrant workers’ supervisors and/or employers may attempt to intimidate them, to deter them from reporting any dissatisfaction they suffer in the workplace. For example, Mr. Aminul recalled how his supervisor hurled vulgarities at him and threatened to involve the police when he began his claim for work injury compensation.

Mr. Saju’s case<sup>22</sup> reflects a clear example of physical abuse. His new employer requested that he sign twelve blank payment vouchers – on the pretext that it was in advance for his accommodation – and then dismissed him two months into the job. When he requested the pay owed, his employer punched him.

The situation is often amplified for domestic workers ‘captive’ in their employer’s residences. A 2005 survey of 115 Indonesian domestic workers in Singapore revealed that two-thirds had limited access to information and communication with other people, not being allowed to go outside, not enough time to rest and no day off<sup>23</sup>. Many domestic workers are dehumanised and treated like ‘second-class citizens’. For instance, their employers may – in their presence – tell their friends about how ‘stupid’ or ‘clumsy’ they are, or abrasively order them about with no pleasantries, not even a simple ‘please’ or ‘thank you’.

Ms. Saedatun<sup>24</sup>, a 26-year old Indonesian domestic worker, is an extreme case. She was repeatedly kicked in the buttocks, abdomen and upper thighs by her employer after she forgot to sweep the floor before mopping it. Desperate, she was driven by her circumstances to climb out of a bathroom window of the flat, despite the fact that it was 36-storeys high and it was already past midnight.

## A reluctance to report

Even when migrants workers *are* aware of their existing rights and the route through which these rights can be pursued, there is a systemic reluctance to make a report. This fear goes beyond

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<sup>21</sup> See MOM, “Work Permit – Before you apply”. <<http://www.mom.gov.sg/foreign-manpower/passes-visas/work-permit-fw/before-you-apply/Pages/overview.aspx>> Accessed 13 September 2014, 18:25.

<sup>22</sup> Alex, TWC2, “In three months: three scams and one hantam”. <<http://twc2.org.sg/2014/08/17/in-three-months-three-scams-and-one-hantam/>> Accessed 13 September 2014, 18:41.

<sup>23</sup> A. Savitri Wisnuwardani, Alb. Bambang Buntoro, Mulyadi and Sri Palupi, “Problems Faced by Indonesian Migrant Domestic Workers in Singapore: Data and Facts” Working Forum on Justice for Migrant Domestic Workers (FOKER), Working Team on Record and Information, Institute for Ecosoc Rights, 2005; also see Webmaster, TWC2, “Fact sheet: Foreign domestic workers in Singapore (complaints and abuse)” <<http://twc2.org.sg/2011/11/16/fact-sheet-foreign-domestic-workers-in-singapore-complaints-and-abuses/>> Accessed 13 September 2014, 20:10.

<sup>24</sup> See S. Alkhatib, “Employer kicked maid for not sweeping floor” (*The New Paper*, 29 August 2014).

supervisors' and/or employers' potential threats; it is intrinsically linked to the mechanics of the complaint procedure and its consequential fruits.

When a worker becomes embroiled in a dispute with his supervisor and/or employer – whether it be, for example, (i) because of a work injury, (ii) because his supervisor/employer hit him, (iii) because his supervisor/employer refused to pay his salary or (iv) because he himself or his supervisor/employer engaged in some form of illegal activity – his work permit will be revoked. Instead, he is placed on a 'Special Pass'. 'Special Passes' tend to be granted for the length that it takes for the dispute to be resolved and to obtain medical treatment, if necessary.

At first blush, this appears perfectly satisfactory – naturally the worker should remain in Singapore until his dispute is resolved. However, what drives these workers to despair and desperation is the time that it does take for their disputes to be resolved.

A few days ago, I met Mr. Tanuir whose accident – an ankle injury caused by a collision with a high beam – occurred on 4<sup>th</sup> September 2010. Four years later, he is still in Singapore. He remains Micawberistically optimistic that his dispute will soon be resolved, so that he can finally return to Bangladesh. His parents have passed away since and he, still waiting for his dispute to be resolved, was unable to attend their funeral.

Another case that illustrates this point is that of Mr. Kamal<sup>25</sup>. Although his four-months overdue salary arrears were paid in May last year, he has remained here for reasons unknown to him. He waited for eleven months – up till the time of interview – for an air ticket home and permission to leave.

The primary frustration that workers on a 'Special Pass' face lies within the fact that the pass expressly forbids them from finding work whilst waiting for their disputes to be resolved. They have no source of income. They are basically stranded in a foreign land, whose language and customs they are not well-versed in, with little money, few friends and no family, for what they may perceive as an 'indefinite' period. When their employer fails to provide food or accommodation – despite their legal obligation to do so – and the worker seeks survival through the shadow economy, it is the worker who is punished when caught working illegally, not the employer<sup>26</sup>.

The Cuff Road Food Programme is TWC2's signature project; it provides free meals to these migrant workers on a 'Special Pass'. It provides free meals to migrant workers six days a week, and provides a pivotal point of contact for destitute workers in need of help or a friendly ear<sup>27</sup>. Other projects, such as (i) the Medical Care Fund (for medical and dental treatment not within the employer's responsibility), (ii) FareGo (for transport money) and (iii) Project Roof (for workers with no roof) aim to make these workers' remaining time in Singapore bearable and facilitate their daily lives, as they wait for their disputes to be resolved.

It is crucial to understand that their problems are not separate from ours; while they remain in Singapore, we all form part of the larger Singaporean eco-system. As Nobel laureate J. Stiglitz astutely remarked, "weakening social protection" – regardless for who – will "destabilise the economy by making wages more flexible"<sup>28</sup>. This will make it all the more difficult to reintegrate locals back into

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<sup>25</sup> See E. Zhou, "Kamal of many chops". <<http://twc2.org.sg/2014/04/25/kamal-of-many-chops/>> Accessed 14 September 2014, 14:51.

<sup>26</sup> For example, see Fuxiong, "Illegal hirer reports his own illegal worker". <<http://twc2.org.sg/2014/06/29/illegal-hirer-reports-his-own-illegal-worker/>> Accessed 14 September 2014, 15:10.

<sup>27</sup> Webmaster, TWC2, "Cuff Road Project 2013: Statistics". <<http://twc2.org.sg/2014/04/06/cuff-road-project-2013-statistics/>> Accessed 14 September 2014, 15:18.

<sup>28</sup> J. Stiglitz, 'The global crisis, social protection and jobs' (2009) *International Labour Review*, 11.



the sectors now dominated by the foreign workforce. Moreover, from a community perspective, foreign workers with no work, income or accommodation, forced to remain in Singapore by their circumstances, may beget social resentment. Locals may perceive them as 'loitering', which could generate more stigma and cement ethnic segregation.

## The way forward? Hopes for the future

The themes of harmonious industrial relations, social justice and respect for these workers' basic rights should not be eclipsed by a desire for economic efficiency or nationality-based segregation (a 'local' vs. 'foreigner' divide). A normative approach suggests that human rights are, primarily and above all, normative standards, and certain labour rights, such as (i) the right to pay and (ii) the right to rest, are human rights<sup>29</sup>. Some workers like Mr. Hossain, encountered at TWC2's Cuff Road Project, are made to work nearly 4 times over the maximum overtime permitted by the law. He worked 277 hours of overtime in one month, despite the fact that the Employment Act plainly states that no employee exceed 72 hours of overtime per month<sup>30</sup>. The law should strive to protect these vulnerable workers' rights, and do so in a speedy and efficacious way, optimally *within* a six-month period. Workers like Mr. Tanuir (mentioned above) should not be made to wait 4 years to receive compensation for their injuries, when, above all, they wish to return to their homeland.

When a worker makes a complaint against his employer with regards to a work injury, a salary dispute or abuse, a thorough investigation should be conducted into the company's operations to ensure the worker's claim is adequately addressed and that other workers do not suffer the same fate. Employers must face strong sanctions for systemic breaches of safety regulations, verbal or physical abuse and failure to honour the terms of their employment contracts. It is hoped that MOM's proposals for higher fines and custodial sentences to combat serious health and safety breaches at the workplace<sup>31</sup> will gain traction.

Employers should not be allowed to intimidate witnesses or threaten the jobs of individuals over legal disputes to which they are party in schemes to evade the full fury of the law. MOM's present policy of 'naming and shaming' errant employers<sup>32</sup> is commendable and should extend to such employers. It is hoped that TWC2's proposal<sup>33</sup> that all Work Permit holders be granted the right to change jobs without their employer's permission. The present absence of this right makes them hostage to their employers' whims, substantiating threats that employers may make.

Within the companies themselves, employers should seek to actively tackle harassment and ensure that their supervisory staff have specific training and guidelines on how to deal appropriately with the workers. In the United Kingdom, the Gangmasters Licensing Authority (GLA), separate from the Department for Business, Innovation & Skills (BIS), was formed to create licensing standards with respect to the supply of workers in certain sectors. Industry-level licensing standards may be a possibility that could be looked into, to regulate how Singapore-based companies deploy the use of

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<sup>29</sup> See V. Mantouvalou, 'Are Labour Rights Human Rights?' (2012) 3 European Labour Law Journal, 151-172.

<sup>30</sup> s. 38(5) Employment Act (Chapter 91).

<sup>31</sup> See Xinmsn News, "MOM to push for stiffer penalties against safety breaches at worksites". <<http://news.xin.msn.com/en/singapore/mom-to-push-for-stiffer-penalties-against-safety-breaches-at-worksites>> Accessed 14 September 2014, 20:14.

<sup>32</sup> MOM, "Blacklisting" <<http://www.mom.gov.sg/foreign-manpower/passes-visas/work-permit-fw/before-you-apply/Pages/blacklisting.aspx>> Accessed 14 September 22:24.

<sup>33</sup> See Webmaster, TWC2, "Our Stand: Work permit holders should be free to change employers and stay longer". <<http://twc2.org.sg/2013/10/17/work-permit-holders-should-be-free-to-change-employers-and-stay-longer/>> Accessed 14 September 2014, 21:38.

foreign worker agencies/agents. TWC2 has proposed that a centralised, digital job marketplace ('the Exchange') could be introduced to eliminate the role of the middlemen, i.e. the shadowy job agents.<sup>34</sup> Jobs available must be offered *only* via the Exchange, and all agreements must be made through it. If workers who have passed the Building and Construction Authority (BCA) skills tests in their home country will be eligible to register for access. This will also upgrade the skills market in Singapore – the job offer is contingent on the worker possessing a *recognised* trade qualification.

Returning to the topic of workers *already* in Singapore, it is hoped that employers will continue to house workers on 'Special Passes' awaiting dispute resolution<sup>35</sup> - and that this obligation will be actively enforced. Any employers who apply pressure on workers to leave the accommodation, attempt to impede their right to peacefully re-enter or violate their privacy should be dealt with harshly<sup>36</sup>. As proposed by TWC2 in a separate paper<sup>37</sup>, a separate avenue that could be explored is the possibility of allowing migrant workers who have lost their jobs, for whatever reason, and are not embroiled in a legal dispute the opportunity to seek a new job locally before being repatriated. This will prevent "worker-churning" and help retain skilled and experienced workers in Singapore<sup>38</sup>.

Taken together, these proposals – and a powerful enforcement mechanism – can drive for a stronger, firmer concept of 'equality' as we know it, and ensure systemic improvement in the protection of the migrant workers' rights in Singapore.

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<sup>34</sup> See Alex, TWC2, "Overhauling Singapore's migrant labour system – an alternative plan". <<http://twc2.org.sg/2014/09/15/overhauling-singapores-migrant-labour-system-an-alternative-plan/>> Accessed 3 October 2014, 16:25.

<sup>35</sup> See Webmaster, TWC2, "Our Stand: Housing workers who are on special passes". <<http://twc2.org.sg/2013/10/17/our-stand-housing-workers-who-are-on-special-passes/>> Accessed 14 September 2014, 19:05.

<sup>36</sup> *ibid.*

<sup>37</sup> See Webmaster, "Our Stand: Work permit holders should be free to change employers" (n 33).

<sup>38</sup> *Ibid.*