TWC2 TRANSIENT WORKERS COUNT TOO

Stern warning – punishment without due process

February 2023

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1. Introduction

Singapore's 'stern warning' system has a disproportionate impact on foreign workers. It is an opaque, extra-judicial process without a statutory basis meant to be an alternative to criminal prosecution for less serious offences such as an affray and outrage of modesty. Singapore's use of the stern warning differs from England, Wales and Victoria (Australia) in that the accused person does not have to admit to the commission of the offence. While the stern warning is often described by the local press as a 'slap on the wrist', there is no public awareness of the precise effects of stern warnings, which are detrimental to Singaporeans and, more so, to foreigners.

TWC2 has encountered many migrant workers whose lives have been severely affected by stern warnings because it can result in their deportation or repatriation and their consequent ineligibility to return to Singapore to work.

This article will (1) provide a general overview of Singapore's stern warning system, (2) discuss the effects of stern warnings in general and their unique effects on foreigners, (3) identify issues, and (4) propose changes to the current system.

2. General overview of the stern warning

A stern warning is one of the '*forms of punishment other than prosecution*'[1] issued to suspected offenders or accused persons (collectively, '**alleged offenders**'); it appears to be issued mostly to first-time accused offenders of minor offences. In Singapore, the stern warnings system is not legislated, and there is no publicly available guidance on its issuance or avenue for appeal. The result is that the public and lawyers may have varying levels of understanding regarding stern warnings and may wholly misunderstand their effects. Singapore's legal scholars have argued that this is a pertinent area in need of greater clarity from the authorities.[2] Due to this opacity, our approach to understanding stern warnings has been to collect information across individual cases and infer the rules and practices behind them.

2.1 Two types of Stern Warning

a. **Unconditional Stern Warning**, which is the main focus of this article, comes with no conditions attached. If the alleged offender had been charged prior to receiving a stern warning, the warning carries an effect of a Discharge Amounting to an Acquittal (DATA),[3] meaning that the charge is withdrawn and the person will not be prosecuted for the same offence.[4] Although it may be that,

[1] AGC 'EXECUTIVE SUMMARY - Ensuring every criminal case receives a fair outcome' (AGC, 1 July 2018) <https://www.agc.gov.sg/docs/default-source/newsroom-doucments/1)-mitigating-factors_early-guilty-plea-and-show-of-remorse3447619072684c559fe1ad8d3f9febc2.pdf> accessed 11 February 2023.
[2] Tan Hee Joek, 'Be warned of the Stern Warning' [2013] Law Gazette, 843.
[3] ibid.
[4] 'What is Acquittal & How Can One Be Acquitted in Singapore?' (SingaporeLegalAdvice.com 9 April 2021), <https://singaporelegaladvice.com/law-articles/acquittal-acquitted-singapore/> accessed 1 April 2022.

in some cases, the authorities seek the alleged offender's acceptance before issuing a stern warning,[5] TWC2 has not recorded any case in recent years where the alleged offender's acceptance was sought.[6] We note that in England and Wales, a stern warning cannot be given unless there is an admission of the offence and acceptance by the accused. Seeking the offender's acceptance would mean that the alleged offender is given a choice whether to (1) accept the stern warning and have the charges against them withdrawn or (2) reject the stern warning and proceed to a trial.

b. **Conditional Stern Warning** comes with conditions the offender must adhere to, such as not committing any other offence within a stipulated period. Failure to comply with the conditions may result in prosecution.[7] The effect is a Discharge Not Amounting to an Acquittal (if the person had been charged prior). Although it is believed that the alleged offender's acceptance is required for this type of stern warning,[8] we noted one recent case showing that acceptance was not required.[9]

2.2 Rationales for a stern warning in lieu of prosecution

a. **Efficient and cost-effective —** From the perspective of policymakers, a stern warning can be an efficient and cost-effective way to deal with minor offences.[10] As issuing a stern warning does not involve any court proceedings, stern warnings collectively contribute to a substantial cost saving for the courts and relevant authorities.[11]

b. **It provides a 'second chance' —** It could also be argued that a stern warning gives alleged offenders a second chance by saving them from the impact/stigma of a criminal record.[12]

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[5] Tan (n 2).
[6] One example of the Police seeking an acceptance by the alleged offender can be found here: HOME, 'Warned No To Sign' (Humanitarian Organization of Migrant Economics, November 2011), <https://www.home.org.sg/our-updates/2020/4/19/warned-not-to-sign> accessed 29 April 2022.
[7] AGC (n 1) 2.
[8] Tan (n 2).
[9] Kristen Han, 'Taking the state to court.' <https://www.kirstenhan.com/blog/taking-the-state-to-court> accessed 12 January 2023. Note: Ms Han confirmed, in response to TWC2's inquiry, that she was not asked to accept the warning by the police.
[10] Research and Prevention Division, 'Police Cautioning of Adults: Drug and Other Offences, A briefing paper' (Criminal Justice Commission (Queensland, Australia), April 1999), 5.
[11] Carleen Thomson, et al. 'Examining adult-onset offending: A case for adult cautioning' (Trends & issues in crime and criminal justice No. 488, October 2014), 5.
[12] Research and Prevention Division (n 10).

2.3 Who can issue a stern warning

Government agencies with prosecuting authority, such as the Singapore Police Force and the Ministry of Manpower (MOM), can administer stern warnings.[13] According to the recently issued warnings, it is believed that the Police stern warnings are subject to the direction of the Attorney-General's Chambers (AGC),[14] while the MOM's stern warnings are not.

2.4 When a stern warning is issued

A stern warning may be issued to a suspect at the end of the investigation (without the suspect being charged for the same offence) or to an accused person who has been charged with an offence anytime before conviction or acquittal.[15]

2.5 Issuing guidelines

For Police stern warnings, the AGC has the discretion to decide whether the alleged offender will be released without any further action by the AGC, be issued a stern warning, or be prosecuted.[16] The AGC's policy for handling stern warnings is not available to the public.[17] An article published by the AGC in 2018 indicates that the personal circumstances of the alleged offender could be a factor in issuing a stern warning.[18] A stern warning could also be issued where the prosecution's case is weak.[19]

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[13] Due to the absence of legislation and any guidelines available to the public, this statement is made to the writer's best knowledge based on various materials including news articles and the court documents.
[14] AGC (n 1) 2.
[15] A man received a stern warning after the prosecution decided to withdraw the charges against him in the midst of a trial. See Osmond Chia, 'Migrant worker accused of faking workplace injury acquitted after charges dropped' (*The Straits Times*, 23 November 2021) <https://www.straitstimes.com/singapore/courts-crime/migrant-worker-accused-of-faking-workplace-injury-acquitted-after-charges> accessed 5 April 2022.
[16] Constitution of the Republic of Singapore, s 35(8).
[17] AGC, 'Publication of Prosecutorial Guidelines' (AGC Singapore, 22 May 2013).
[18] AGC (n 1).
[19] *Wham Kwok Han Jolovan v Attorney-General* [2015] SGHC 324, [44].

For cases under the jurisdiction of other government agencies, guidelines for issuing stern warnings are also unavailable.

2.6 Issuance

a. A stern warning usually takes the form of a two-page document. The first page shows the alleged offence, legislation, date, time and place of commission. The second page contains a note saying that there has been an assessment that the person committed the offences(s) listed on the first page. (The exact wording can be found in this sample.)

b. A stern warning is usually handed out by the issuing authority (e.g., the Police) to the alleged offender.

2.7 Remedies

As stern warnings are not administered under any legislation, there is no specific statutory procedure to challenge their issuance. In practice, there are two possible courses of action.

a. **Representation** — Recipients of a stern warning can write a letter to the relevant authorities (e.g., the Police or AGC) and explain why the stern warning should be withdrawn or expunged.[20] However, the effectiveness of such appeals is unknown because the authorities have no obligation to respond or provide grounds for their decision to reject the appeal. It was reported in a 2015 High Court decision that the recipient of a stern warning received no reply from the Police after he wrote a letter to protest the issuance of the stern warning against him.[21]

b. **Judicial Review**[22] — Alternatively, stern warning recipients may apply for a judicial review against the AGC to quash the stern warning. In 2015, the High

[20] ibid, [34].
[21] ibid, [7].
[22] Judicial review is a *'process by which the High Court exercises supervisory jurisdiction over individuals/bodies ("public bodies") that perform public functions and duties'*. See AGC, 'Media Fact Sheet Judicial Review Proceeding' (AGC 31 May 2021).

Court rejected the application for judicial review to quash a stern warning as the court found that the warning did not bind the applicant in a manner that directly or indirectly affected the applicant's legal rights, interests or liabilities.[23] Thus, the court ruled that there was nothing for the court to 'quash'.[24] This decision suggests that the court may approve future applications to quash a stern warning if an applicant can demonstrate that it directly or indirectly affected their legal rights, interest or liabilities. One downside for the applicant is the high cost of engaging a lawyer and associated court fees.

2.8 Comparison with other jurisdictions

This section will briefly introduce similar systems of warning (or cautioning) in England and Wales and Queensland (Australia) for comparison. In terms of the rules of administration, England and Wales adhere to significantly stricter criteria and procedures, while Queensland's system positions itself somewhere between England and Wales and Singapore.

a. **England and Wales —** In England and Wales, a similar warning system is called a 'simple caution'. A simple caution is administered mainly for low-level offences[25] where the offender admits to the offence,[26] and there is a realistic prospect of conviction[27].[28] Unlike Singapore's Stern Warning system, a simple caution leaves a criminal record. In England and Wales, a simple caution cannot be issued without the alleged offender's admission of guilt and acceptance.[29] In other words, an alleged offender is given an option to opt-out (refuse the simple caution) and proceed to a trial. Importantly, the guidelines for the administration of a simple caution are available to the public.[30]

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[23] Chooi Jing Yen, 'Reasonable Doubts, Guilt and the New Hybrid of Composition' (2021) Law Gazette <https://lawgazette.com.sg/feature/reasonable-doubt-guilt-and-the-new-hybrid-of-composition/> accessed 22 April 2022.
[24] *Wham* (n 19), [45].
[25] Ministry of Justice (UK), 'Simple Cautions for Adult Offenders' (2015), [27].
[26] ibid, [20].
[27] ibid, [25].
[28] BBC, 'Labour councillor cautioned for assault on Tory colleague' BBC (12 April 2022) <https://www.bbc.com/news/uk-england-lancashire-61082041> accessed 8 April 2022.
[29] The acceptance is necessary apart from the admission of guilt for administering simple caution. This is because the offender, despite having admitted the offence, may raise a defence in court such as self-defence. See Simple Cautions for Adult Offenders (The Ministry of Justice (UK) 2015), [22].
[30] Ministry of Justice (UK) (n 25).

b. **Queensland, Australia —** Queensland's caution system is similar to Singapore in that it is not legislated, but its system differs from Singapore in that its rules are set forth in the Police Operational Manual, which is available to the public.[31] Like in Singapore, the cautions are not a formal punishment, and they do not become a part of the accused's criminal record. However, as in England and Wales, the accused's admission of guilt and acceptance is required to administer a caution.[32]

	Singapore - Stern Warning -	England and Wales - Simple Caution -	Queensland, Aus - Caution -
Is it legislated?	×	○	×
Is there publicly available guidelines?	×	○	○
Is it consiered a Criminal record?	×	○	×
Who authorised the issuance?	AGC, Other Government Aurhorities	The police and/or CPS	The police
What is the evidential threshhold?	Unknown	Realistic prospect of conviction	None
Eligibility	Unknown	low-level offences of mainly first-time offenders	lower-end, non-habitual offending
Does it require admission of guilt?	No	○	○
Does it require the alleged offender's acceptance?	No	○	○
Is there an official avenue for appeal?	No	No	No

3. Effect of a stern warning

[31] Queensland Police (Australia), 'Operational Procedures Manual Issue, 86 Public Edition' (2022), s 3.2.1.
[32] ibid.

3.1 **Discharge Amounting to an Acquittal (DATA) —** When a stern warning is issued to an accused person, it is believed that the warning comes after the charge is withdrawn (DATA). DATA means the accused person is acquitted and there will be no further inquiry. However, DATA must not be confused with an acquittal by a court of law. The authorities can not issue a stern warning to an accused person who was acquitted by the court since doing so would directly contradict the court's finding. A DATA is perhaps best described by a quote by Singapore's former Attorney General Chan Sek Keong: *'a person acquitted of a charge is legally innocent but may not be factually innocent*'.[33]

3.2 **Subsequent offence —** The warning says that the authority may not be so lenient the next time the person commits any new offence.

3.3 **Future court proceedings —** Before 2015, there were several court cases where the offender's prior stern warnings were considered as antecedents for enhancing a sentence[34] without close examination by the Courts on the circumstances of each stern warning.[35] However, in the 2015 court case, the Court agreed with the AGC's position that '*it would be wrong for a court to take into account a prior warning… for the purpose of sentencing*'.[36] A similar statement is now found on page 2 of the stern warning.[37]

3.4 **Legal rights, interests or liabilities**: It was also clarified in 2015 that stern warnings were merely an opinion of authority that the recipient had committed an offence. They

[33] Ministry of Law, 'Oral answer by Law Minister K Shanmugam to Parliamentary Question on acquittal & presumption of innocence' (*The Ministry of Law,* 25 August 2008), [19]. <https://www.mlaw.gov.sg/news/parliamentary-speeches/oral-answer-by-law-minister-k-shanmugam-to-parliamentary-question-on-acquittal-presumption-of> accessed 28 April 2022.
[34] Six such cases were mentioned in Tan (n 2); IRB Law LLP, 'Stern Warnings in Singapore' (10 Feb 2020) <https://irblaw.com.sg/learning-centre/stern-warnings-in-singapore/> accessed 3 April 2022.
[35] IRB Law LLP, 'Stern Warnings in Singapore' (10 Feb 2020) <https://irblaw.com.sg/learning-centre/stern-warnings-in-singapore/> accessed 3 April 2022.
[36] *Wham* (n 19), [43]-[44]. See also *Teo Seng Tiong v Public Prosecutor* [2021] SGCA 65, [88].
[37] On the second page of stern warning issued in 2020 reads '*Note: 2. This stern warning…. (c) will not be raised by the Prosecution as a criminal record against you in any future court matters for purposes of enhancing a sentence…'.*

are not meant to affect the recipient's legal rights, interests or liabilities,[38] as it is merely '*a warning, ie, a communication to its recipient'*.[39]

4. Observed effects of stern warnings

4.1 Effect on existing pass status of foreigners

a. **Work Pass holders** — Over the past decade, TWC2 recorded many cases where foreign work permit holders received stern warnings after being subjected to a police or MOM investigation. In most cases, stern warnings led to the cancellation of the work pass and repatriation of the alleged offenders.[40] In some cases, the foreigners faced deportation.

b. **Special Pass holders** — A Special Pass allows foreigners to remain in Singapore for various reasons.[41] Some Special Passes are issued to foreigners who are required to remain in Singapore to assist in investigations by the authorities. Foreigners accused of committing offences and waiting for court proceedings may also be put on Special Pass. Special Pass holders who receive a stern warning would normally lose the eligibility to renew the Special Pass, given they no longer have a reason to remain in Singapore. In some cases, the Special Pass was cancelled[42] with immediate effect by the ICA following the issuance of a Police stern warning and the AGC's withdrawal of charges (DATA). The sudden loss of a legal immigrant status meant the foreigner became an illegal overstayer, giving the ICA a legal justification to issue a removal order[43] against the foreigner, which resulted in a detention order[44] and deportation.

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[38] On page 2 of the stern warning issued in 2020 reads '*Note: 2. (d) does not affect any of your legal rights, interests, or liabilities'.*

[39] *Wham* (n 19), [33].

[40] The regular repatriation process involves the MOM instructing the employer to purchase an air ticket and the recipient of stern warning goes home voluntarily after 1-2 weeks. Meanwhile, the recipient is not detained by either the police or the ICA. On the other hand, deportation involves the recipient being detained at the police or ICA detention centre while waiting for the flight home.

[41] Immigration Regulations, reg 15.

[42] ibid, reg 15(4).

[43] Immigration Act 1959, s 33(1).

[44] ibid, s 34(1).

4.2 **Eligibility for new work pass application** — Over the years, TWC2 has observed that the effect of a stern warning is a long-term ban[45] on the individual's eligibility to work in Singapore. We are currently collecting data but do not yet have enough information to assess the correlation between the types of offences and the number of years the recipient is banned from working in Singapore.

4.3 **Reputation —** A stern warning represents the opinion of the authorities (e.g., the Police and AGC) that the person committed an offence. This could cause reputational harm as it gives the impression that the person is factually guilty of the offence. A stern warning could affect the recipient's employability (there was a case in 2005 where the Police informed the employer about their employee's stern warning[46]) and relationships with friends and family. The effect would be enhanced if the case were reported in the media.

5. Concerns

This section focuses on the key concerns of the current stern warning system.

5.1 **Due process —** For Singaporeans and foreigners alike, one significant cause for concern is that a stern warning, as admitted by the AGC, is one of the '*forms of punishment other than prosecution*'[47] even after the accused person denies the allegation or formally pleads not guilty. This contrasts with England and Wales, where an individual must admit to committing the action that led to the offence before receiving a simple caution. Without the requirement of an admission of guilt, there is a clear possibility that a stern warning could result in the unjust punishment of an innocent person.

5.2 **Accountability** — The courts play an important role in scrutinising the AGC's decision to prosecute. This was one of the justifications for AGC's decision to make the

[45] It is unclear if the ban is permanent or just for a few years as the MOM will not reveal how long each recipient of stern warning is banned from applying for a new work permit.
[46] Tan (n 2).
[47] AGC (n 1).

prosecution guidelines publicly unavailable.[48] However, the decision to issue stern warnings is not subjected to the court's scrutiny. Currently, if a stern warning recipient feels that there were insufficient grounds for the decision to issue a stern warning, the only way to formally challenge a stern warning is a judicial review which is very costly to pursue.

5.3 **Effects on legal rights, interests or liabilities —** The court and the AGC agreed in the 2015 case that a stern warning did not and should not have a direct or indirect effect on the recipient's legal rights, interests or liabilities. It is worth noting that the applicant in this 2015 case was a Singaporean Citizen who had no concern about the stern warning affecting his ability to remain in Singapore. As a result, the impact of stern warnings on foreigners was not considered in the court's decision in the 2015 case.

a. **Work Pass and Special Pass privileges** — There is clear evidence that a stern warning directly impacts a foreigner's eligibility for a Work Pass or Special Pass.

b. **Personal Liberty** — In some cases, Special Pass is cancelled with immediate effect upon issuance of the stern warning. Without a new Pass to legitimise their stay in Singapore, the foreigner becomes an illegal over-stayer. This then results in detention and deportation by the ICA. In such a situation, it could be said that the stern warning indirectly affected the recipient's legal right to personal liberty.

6. Propositions

TWC2 has observed cases where the stern warning affects the recipient's legal rights (i.e., personal liberty), ability to pursue future employment, and reputation in Singapore. Stern warnings punish their recipients without due process. The available avenues for appeal against the issuance of a stern warning are ineffective and costly.

6.1 **Transparency —** The current stern warning system is opaque because the issuing criteria are not available to the public.[49] As stern warnings affect the recipients' legal rights, employability and reputation, the grounds for a stern warning should be made

[48] AGC (n 17).
[49] ibid.

available to the recipient. Additionally, publishing guidelines and setting up a cost-effective avenue for appeal would contribute to the system's transparency.

6.2 **Limiting the effects of stern warning** — A stern warning should not be considered part of the criterion for work pass or special pass eligibility. More importantly, a stern warning should not trigger immediate cancellation of immigrant status. A stern warning should remain a mere opinion of the authority, not a punishment.

6.3 **Admission of guilt as a precondition —** A more comprehensive solution is to make admission of guilt and acceptance the preconditions for issuing a stern warning. This will be similar to Queensland's caution system mentioned above. Singapore's legal experts have expressed similar views.[50] These preconditions will ensure due process and uphold the presumption of innocence and allow those who choose to claim trial the opportunity to defend themselves in a court of law. Where an accused person denies the allegation and the prosecution does not have sufficient evidence to proceed, no stern warning should be issued.

7. Conclusion

While stern warnings may offer a more cost-effective and less stigmatising punishment for less-serious offences, Singapore's particular way of administering stern warnings departs in critical ways from stern warnings in other countries like England and Australia. Specifically, in Singapore, stern warnings are issued even when there is no admission of guilt, and the alleged offender wants to clear his name in a court of law. There is also no known effective way to challenge a stern warning, which could have detrimental effects on the recipients. The system, as it is currently run, severely undermines core principles of due process. Along with other legal experts, we recommend that the Singapore authorities review its stern warning system in terms of criteria and transparency.

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[50] Tan (n 2); IRB Law LLP (n 35); Benjamin Khoh 'The Publication of Prosecutorial Guidelines and Duties: a Necessary 'Evil' of the Criminal Justice System' [2020] SCLR 26, 28-29; Tan Hee Joek, 'Police warning but not prosecuting offenders: What does it mean and can it be improved?' (Today, 31 May 2019) <https://www.todayonline.com/commentary/warning-not-prosecuting-offenders-what-does-it-mean-and-can-it-be-improved> accessed 29 October 2022.

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