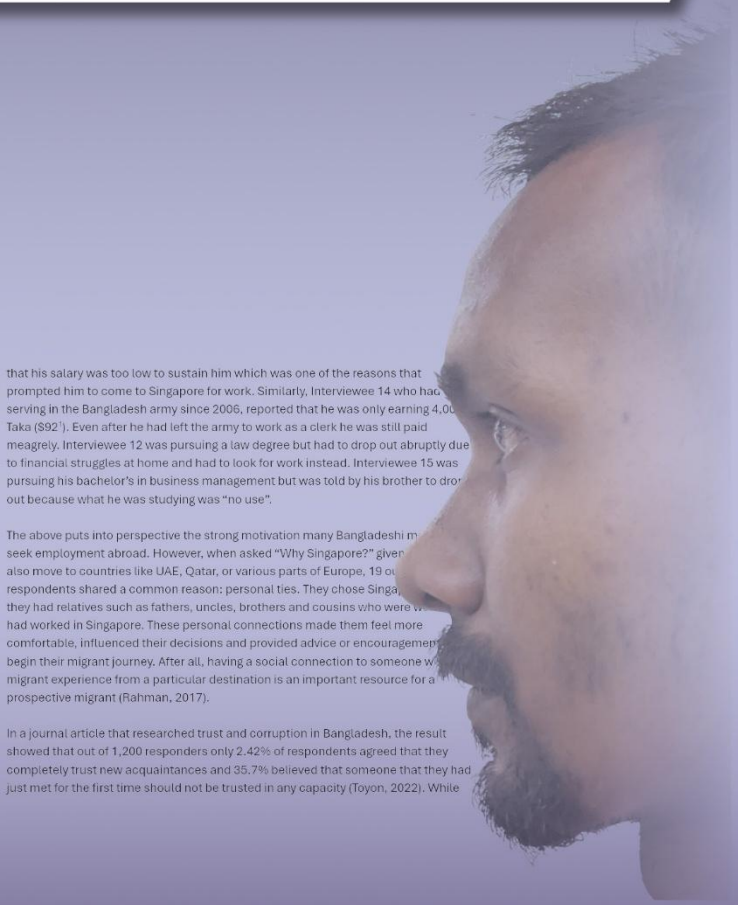
TWC2
transient workers count too

The rocky road to a transfer

Experiences in looking for new jobs with Change of Employer letters in hand

August 2025



that his salary was too low to sustain him which was one of the reasons that prompted him to come to Singapore for work. Similarly, Interviewee 14 who had serving in the Bangladesh army since 2006, reported that he was only earning 4,00 Taka ($92[1]). Even after he had left the army to work as a clerk he was still paid meagrely. Interviewee 12 was pursuing a law degree but had to drop out abruptly due to financial struggles at home and had to look for work instead. Interviewee 15 was pursuing his bachelor's in business management but was told by his brother to dro out because what he was studying was "no use".

The above puts into perspective the strong motivation many Bangladeshi m seek employment abroad. However, when asked "Why Singapore?" given also move to countries like UAE, Qatar, or various parts of Europe, 19 o respondents shared a common reason: personal ties. They chose Singa they had relatives such as fathers, uncles, brothers and cousins who were had worked in Singapore. These personal connections made them feel more comfortable, influenced their decisions and provided advice or encouragemen begin their migrant journey. After all, having a social connection to someone w migrant experience from a particular destination is an important resource for a prospective migrant (Rahman, 2017).

In a journal article that researched trust and corruption in Bangladesh, the result showed that out of 1,200 responders only 2.42% of respondents agreed that they completely trust new acquaintances and 35.7% believed that someone that they had just met for the first time should not be trusted in any capacity (Toyon, 2022). While

were unaware of its existence, though that is not the only reason why respond spoke mostly of using unlicensed agents, who are often Bangladeshi nationa operating illegally in Singapore (dalals). The latter have connections with Sing companies or Singapore-licensed agencies and it is these connections that e their effectiveness (Rahman, 2017).

Reflecting this, respondent #5 detailed difficulties in finding a Singaporean agen willing to help him look for a job during his salary claim process. He speculate these agencies potentially earn more when workers go through dalals who i deal with the Singaporean agencies. TWC2 case officers have heard from that they were turned away by Singapore licensed agents only to be "help referred to other brokers who turned out to be dalals. Respondent #2 fu confirmed this theory, sharing with us that over the 11 years he has wor Singapore, he came to learn that these dalals operate in a systematic wa collect the passports from workers who are looking for a job before passing it off t Bangladeshi middle man who then applies for IPAs with the assistance of Singapo licensed agents.

Amounts charged by dalals tend to be over $2,000 despite the law. The Employment Agencies Act has limited the chargeable agent fees for Singapore employment agencies to no more than one month of the worker's salary for each year of their permit validity, capped at two months of salary (MOM, 2024). This cap applies to Singapore-licensed employment agencies. However, as dalals are already breaking the law in providing job-matching services without a licence, they no doubt see no

An employee cannot be considered free if exercising his right to salary would lea his termination, which in turn is concomitant with other challenges such as pay debts. Thus, reform of policies relating to salary payment is inadequate without worker protection over job mobility.

From the Middle East to Asia, limited job mobility is a common issue for migrant workers, strung primarily to a sponsorship system that has manufactured extrem power imbalance in an employer-employee relationship. In the Gulf, this syste generally known as the *kafala* sponsorship system (although Bahrain and Qa recently abolished it). While specifics differ, broad similarities in structure observed since the system emerged to regulate the new influx of migrant amidst similar historical, political and economic conditions shared by th states.

Under this system, the sponsor or the *kafeel* (citizens or local companies) is given permit to employ foreign workers. Migrant workers are dependent on their employer to obtain, renew and cancel work permits, residency visas and their identity cards. Travel, food and accommodation costs are also covered by the employer. Should workers wish to change jobs, they have to obtain the consent of the employer. Finall some states additionally mandate migrant workers' exits to be controlled by their employer: only earlier this month, Kuwait joined Saudi Arabia in legislating mandatory

0. Contents

Transient Workers Count Too, Singapore

www.twc2.org.sg

Gay Jia Xuan, August 2025

I. Introduction

A *Change Of Employer* letter (hereinafter referred to as COE), is issued to Work Permit holders by the Tripartite Alliance for Dispute Management (TADM), when a valid employment claim, which term includes salary claims, is filed. COE grants a worker permission to look for a new job. As long as the COE remains valid (usually two weeks, but renewable) employers interested in hiring the worker can apply to the Ministry of Manpower (MOM) for a new "In-Principle Approval for a Work Permit" (IPA). Once approved, the worker, now with an IPA in hand, can commence employment with a new employer.

The process of COE issuance is opaque and appears to be discretionary; there does not appear to be any clear framework either on how the period of validity is determined.

This study seeks to bring to light workers' experiences with the COE and their search for new employment.

After a salary claim is lodged at TADM, the employer will be notified and TADM will give the employer and worker one week to reach a settlement – this period is known as the 'E-negotiation period'. The 'E' likely means Electronic since the claimant and employer are required to reply via TADM's digital system to ensure transparency.

Workers are under stress not only over the uncertain outcome of the salary claim, but also by the fact that they are now unemployed. Virtually all workers who come to TWC2 for assistance filing a salary claim report that their Work Permits were cancelled either on or within a few days of the case being made.

As explained through the neoclassical economic theory of migration, seen on the micro-level, these migrants are often in search of higher wages and better economic opportunities (Jones, Fass, 2017). Unemployment during a salary claim is a financial

strain they can ill afford. The issue of how they can get by, and support their families gets acute, and this is on top of their owed salary. Having a COE letter in hand is therefore of critical importance. Even more so is whether they succeed in landing a new job.

Absence of research on this process may be partly due to the fact that COE letters are a fairly new introduction to the salary claim process but it also reflects the lack of academic and institutional perspective-taking, in following the long journey of fight by migrant workers for what they are owed. In this study, we try to break down the process of what happens after a COE is issued, through the first-hand reports of workers engaged in salary claims.

II. Method

Interviews were conducted with migrant workers who had sought help from TWC2 to file salary cases. The focus was to compare the experience of those who had both successfully found new jobs through COE issued by TADM as well as those who had had no luck in doing so. In-depth conversations were conducted to understand what these workers went through as well as their thought processes. The interview questions were structured to gain insights in order to compare a search journey involving agents and one where the worker tries to find a job opening on his own.

Interviews were kept brief, consisting of around 10 short-answer questions which were simplified when required according to each worker's English proficiency – to minimise the impact of language barriers in gathering the story of their experiences. Questions regarding their duration in Singapore and which industry sector they were working in were used to kickstart the interview. This allowed us to take into account their experience level and trade-skill, these being marketability traits, when digesting each worker's unique story.

III. Profile of respondents

Twenty interviews were carried out over the span of four weeks, gathering first-hand experiences from the workers who either still have ongoing salary cases or those who had filed a salary case within the past year. All 20 interviewees were male Bangladeshi workers with 19 of them working in the construction sector and the remaining individual in the service sector. Some workers sought help from TWC2 at the start of their salary claim while others came to TWC2 sometime after they had filed their claims on their own at TADM.

During the job search, out of the 20 workers we spoke with, nine had attempted to find jobs by themselves while eleven turned to agents. Of these eleven, four used agents who were Bangladeshi, and the remaining seven turned to Singaporean agents. It was not always clear from the interviews where the Bangladeshi agents were located but TWC2's casework experience is that almost always COE holders would be approaching Bangladeshi nationals present in Singapore and working (illegally) as job agents. In this study, such illegal job agents are referred to as 'dalals' – a Bengali term for middlemen. Of the 20 interviewees, 15 succeeded in landing a new job, three had to return home. Two more were still looking for new employment at the close of this study.

IV. Limitations

This paper focuses on how workers succeed or fail at finding a new job through COE issued during their salary claim. While this research held no original intent to focus solely on Bangladeshi workers, the pool of workers who were seeking help from TWC2 for salary related issues were mainly from Bangladesh, resulting in the magnification of the experiences of this group of workers. Rather than have a sprinkling of workers from other nationalities in this study, it was decided to focus exclusively on Bangladeshis to avoid any possible complication that may arise from a sample of mixed nationalities. As a result, the findings here may be unique to Bangladeshi workers.

Owing to the small sample size, results should not be interpreted as a broad representation of this demographic either.

Additionally, due to the scope of the interview, it was hard to conduct all 20 interviews face to face as some workers have since returned home to Bangladesh or are currently working a new job, making it inconvenient for them to make it for face-to-face interviews due to their work schedules. Hence some interviews were conducted over the phone, lacking close interpersonal exchanges which may have led to some hesitation in sharing their experience in depth.

V. Findings

This study's findings can be grouped into four themes: (1) The problem with discretion, (2) Direct and personal contacts, (3) Intermediaries, and (4) COE letter as stigma.

Not all workers with salary claims seek to look for new jobs under COE. A minority of salary claimants are happy to go home. Just as the decision for an individual to migrate for the purpose of work is a collective one, made by the worker and their household (Constant, 2013), the same is equally true about the decision whether to continue working in Singapore (seeking a new job under COE) or go home. It is noted that when workers we have talked to shared how they wanted new jobs in Singapore despite having to fork out money to pay agents, they often bring up their family as a strong deciding factor in this decision-making process. One respondent started getting teary-eyed while he recounted how he sold his wife's jewelry to be able to afford to pay the agent to find a job for him so that he could continue working in Singapore.

5.1 The problem with discretion

The validity of a COE is determined on a case-by-case basis, dependent on the TADM officer in charge of the worker's salary case. Although time extensions may be provided by these officers, some workers remain unable to find jobs after their case ends with this attributable to different reasons. While the most common validity of COEs is two weeks, workers we have spoken to reported receiving COEs with varying validity periods, ranging from as short as 5 days up to as long as one month. The generosity of TADM officers in issuance of COEs, however, does not guarantee one landing a job.

In the case of respondent #11, he revealed that he was given seven renewals or extensions over the span of his four-month long salary case by his TADM officer, after the COE had expired. The salary case has since concluded but the worker, despite his various attempts, failed to find a job and returned to Bangladesh. This could be due to the lack of demand of workers in the sector he was working in, the service sector.

In contrast, respondent #10 was given only five days to find a new job and get the prospective new employer to apply for a new IPA or he would face repatriation. Having just five days to find a company willing to take him in despite having an active salary case was extremely difficult, resulting in him paying two different Bangladesh-based dalals. Even workers who had successfully found a job within the given validity of the COE said that finding jobs in such short time frames was difficult. Respondent #3 who had fortunately found a new job in just two days felt that, in his case, his success was due to his work experience and exposure to other employers through joint contractor projects. “Sometimes need more time… one month is better for people,” he added.

The search and wait for new employment does not end once a worker finds an employer willing to take him in. The reality for respondent #12 was one of uncertainty. Even though he found a company willing to hire him, IPA approval took time and he could not be sure whether he would successfully land the job . He told us, “Hard mah, now I don't know this job take or no take”. Around a week later, we checked in on him only to learn that his IPA was rejected as his COE had expired, maybe due to a delay in the application of IPA on the employer's part. As a result, he had to request for another extension before applying once again. Though he had successfully received an extension, the company he had applied to refused to re-submit the IPA application for him, sending him back to square one in his job search journey.

Seven workers shared that their TADM officers had asked them to look for a job before requesting for the formal COE letter and this seems to work in the workers’ favour with five successfully finding a job regardless of their method of search, and the remaining two were still in search. This clearly presents that these migrant workers’ chance of success depends substantially on the discretionary generosity of their TADM officers to issue them COEs. The uncertainty of that piece of paper comes on top of other issues such as daily sustenance.

5.2 Direct and personal contacts

Some workers had the advantage of knowing other employers or their managers or supervisors. This arises from the fact that in many construction projects, different subcontractors work alongside each other at the same worksite. Bosses, managers and supervisors thus get to know workers belonging to other subcontractors, and vice versa. Having direct contact with possible employers, workers may be able to avoid blindly searching for a job. Three workers shared that they had found a new job through prior contacts with their new employer who had expressed interest in hiring them even before the salary issue arose. The other four workers who had found jobs on their own had utilised their social networks of friends working in Singapore, asking for introduction to their companies.

It should be noted that even if a worker can find a job through his own contacts, it does not mean that he can avoid paying for the job. Even friends may ask for payment for their help. Other contractors or their decision-makers (managers, foremen) may likewise ask for payment for helping the jobseeker get onto their own team. This practice is an open secret and well known to TWC2 case officers from their many cases. Anecdotally, amounts range from $1,000 to $2,000, but this not being a quantitative study, we did not go into the question of amounts in any detail.

5.3 Intermediaries

Workers who do not have direct and personal contacts leading to job opportunities would naturally have to depend on intermediaries to help them find work. To these workers, intermediaries are the only way they can get to the light at the end of a tunnel, and this absence of choice often means that workers fork out more than what they can afford just to secure a chance at a new job.

Intermediaries are of two kinds: employment agencies holding a licence in Singapore, and unlicensed operators. MOM has an online list of licensed agents, but workers were unaware of its existence, though that is not the only reason why respondents spoke mostly of using unlicensed agents, who are often Bangladeshi nationals operating illegally in Singapore (dalals). The latter have connections with Singapore companies or Singapore-licensed agencies and it is these connections that enable their effectiveness (Rahman, 2017).

Reflecting this, respondent #5 detailed difficulties in finding a Singaporean agency willing to help him look for a job during his salary claim process. He speculated that these agencies potentially earn more when workers go through dalals who in turn deal with the Singaporean agencies. TWC2 case officers have heard from workers that they were turned away by Singapore licensed agents only to be "helpfully" referred to other brokers who turned out to be dalals. Respondent #2 further confirmed this theory, sharing with us that over the 11 years he has worked in Singapore, he came to learn that these dalals operate in a systematic way where they collect the passports from workers who are looking for a job before passing it off to a Bangladeshi middle man who then applies for IPAs with the assistance of Singapore-licensed agents.

Amounts charged by dalals tend to be over $2,000 despite the law. The Employment Agencies Act has limited the chargeable agent fees for Singapore employment agencies to no more than one month of the worker's salary for each year of their permit validity, capped at two months of salary (MOM, 2024). This cap applies to Singapore-licensed employment agencies. However, as dalals are already breaking the law in providing job-matching services without a licence, they no doubt see no reason why they should adhere to whatever the law says about maximum fees.

While speaking about trustworthiness (discussed in the next paragraph), respondent #2 also shared that the likely reason that workers are still returning to these illegitimate agents may be their desperation to land a job. "A lot of workers, maybe 99% cannot find job without agent", further adding "All Bangladesh workers who come here to work, 99% they need to find Bhaiyya agent [dalal], they cannot find Singapore licensed agent cos inside have some corruption you know?".
He was probably alluding to how dalals, operating outside the law, are able to collect larger fees than licensed agencies can; the dalals share the proceeds with the licensed agencies, with such share of proceeds (to the licensed agency) being more than the maximum allowed under the law.

Workers know that dalals are much less reliable, as respondent #15 put it, "Many agent(s) have, sister, but all alibaba one" – meaning that there are plenty of agents about, but they are untrustworthy and prone to deception. On the other hand, one worker who (unusually) used a Singaporean agent, when asked why he did not engage with dalals in his job search, appeared incredulous that dalals would be of any use. He confidently remarked that he used "no Bangladesh agent," asking in return, "Bangladesh agent can use meh?"

Once dalals are engaged, workers are unable to take any legal action against them even if they later find that the job was not what had been described to them – simply because the role of the dalal in securing the job would rarely be documented anywhere. Given this lack of recourse, the question then remains as to why many workers do not even try to use Singapore-licensed agencies instead. The answer is apparent from interviewees' comments: Workers with COEs, which have short validity periods, are desperate to get a new job quickly as they have no easy to get in touch with Singaporean agents. Many workers deemed using dalals their only realistic way, in the little time they had, to find a new job and continue working in Singapore.

5.4 COE letter as stigma

Changes have been made, though far from enough, to the COE since it was first introduced. Where earlier COEs explicitly mentioned that the worker had an ongoing salary claim, such a mention has since been removed. Even so, the COE itself has negative connotations. Although intended to help workers find new employers, it may

in reality, work against them. The fact that a worker is holding such a letter can only mean that he has an ongoing dispute with his previous employer. In the eyes of potential employers, hiring such workers may signal trouble. This worker is conscious of his rights and willing to fight for them. This piece of paper turns from empowerment to barrier. This adverse effect is supported by interviewees' comments that many employers would not even consider them as they are seen as "troublesome". Employers might also fear that taking on such a worker with experience in filing a claim might embolden other, existing employees in the company. Respondent #8 shared "A lot worker see why this guy go court [Employment Claims Tribunal] and everything."

However, not all companies reject workers for this reason. When asked if they faced any friction in their job search process due to the letter, a few workers shared that their new employers listened to their stories and responded with empathy. They reassured these workers that the salary case is not their fault and displayed understanding that having a salary case is not a reflection of their abilities or personalities but that of exploitative conditions outside of their control, hence their decision to take them in as employees. These might well of exceptions to a wider prejudice among employers

Thus, while COE may provide workers a second chance in searching for employment, it can act as a form of silent exclusion marking these workers out as problematic ones, thus defeating the otherwise laudable aim of the scheme.

VI. Conclusion

Findings in this research illuminate how migrant workers' navigation of their salary claim is marked with uncertainty, discretion and tainted with stigma. The issuance of COE is a fairly new introduction into the process of a salary claim and it is evident that more can be done to guide workers through this procedure. Beyond just handing out a COE letter, little more is done to truly help these workers get into new jobs, despite them having been victims of their previous employers' failings.
MOM could do more to promote their page listing all licensed agents as many workers are still unaware of it. In addition, to prevent the collusion between Bangladeshi dalals and Singapore-licensed agencies (and the profiteering this enables) there should be strong enforcement of the Employment Agencies Act, firstly to eradicate unlicensed intermediaries and secondly to stamp out overcharging.

The COE system would also benefit from a more standardised and transparent procedure with respect to its period of validity and the conditions for extensions. This can help ensure that all workers who face salary issues are treated the same way rather than having their fates dependent on the kindness of their TADM officers.

Lastly, on the question of stigma – where employers see any worker with a COE in hand as a potential trouble-maker – TWC2 has advocated that the solution may well lie in incentivising employers to hire them. Such an incentive could take the form of a discount on the Monthly Foreign Worker Levy for the first 12 months of employment. After all, Singapore as a whole benefits from the retention of skills and experience that comes from not sending a worker home. A discount – and the affirmative bias it represents – can be justified on this basis. It can also be justified on the ground that these are workers who have faced an injustice and for whom, despite having the courage to file a salary claim, might not have gotten back all that they were owed. Very often, in TWC2's experience, workers with owed salaries find themselves having to settle for an amount less that what they were actually owed.

We hope this study has shown that the COE is not a panacea by any means. The way it plays out in real life is far short of its intent. The process of issuance and extension is non-transparent and open to too much discretion on the part of the TADM officer. The worker often still has to pay intermediaries for any new job, often considerably in excess of the maximum chargeable amounts set by law. The COE letter itself creates stigma and acts as an impediment, undercutting a worker's chance of success. Much remains to be done to achieve a more equitable and effective system.

VII. References

Constant, A. F., Zimmermann, K. F., & Edward Elgar Publishing. (2013). International handbook on the economics of migration. Edward Elgar Pub. Ltd.

How will foreign workers know how much they have to pay the Singapore employment agency (Ea)? (n.d.). Ministry of Manpower Singapore. Retrieved 10 July 2025, from https://www.mom.gov.sg/faq/employment-agencies/how-will-foreign-workers-know-the-amount-that-they-are-expected-to-pay-the-singapore-ea\

Jones, E. C., & Faas, A. J. (Eds.). (2017). Social network analysis of disaster response, recovery, and adaptation. Butterworth-Heinemann.

Rahman, M. (2017). Bangladeshi migration to Singapore : a process-oriented approach. Springer.