TWC2
transient workers count too

Overworked and underprotected

Excessive overtime and lost rest days suffered by migrant workers in non-domestic sectors

March 2026

0. Contents

I	Introduction	2
II	Research purpose and questions	3
III	Positionality	4
IV	Ethical considerations	4
V	Method and limitations	5
VI	Findings: Working on rest days	6
VII	Findings: Overtime hours per month	9
VIII	Findings: Daily working hours	12
IX	Discussion	15

Transient Workers Count Too
Singapore

www.twc2.org.sg
info@twc2.org.sg

March 2026

I. Introduction

When low-wage migrant workers come to TWC2 for assistance because they have not been receiving their salaries, our case officers begin by helping them calculate how much they are owed. In the process, our officers have observed that workers often report having worked lots of overtime.

Singapore's Employment Act has provisions addressing rest days and overtime hours and it has struck us that the hours of work that our clients were reporting to our case officers might be in violation of law.

How often does this happen? What patterns can we spot? What do the extreme cases look like and how do they impact the workers themselves?

We wanted to get a measure of the problem by putting some numbers together, and we had an intern in October, November and December 2025 keen to do this. She pulled together calculation spreadsheets our case officers had prepared in 2025 while assisting clients, and mined the data for this project.

We had a sense, already, why violations occur. Singapore's labour migration system operates through a permit structure that ties low-wage migrant workers to their employers, rendering workers effectively dependent on their employers for their legal residency, work opportunities, healthcare, and often housing.

Employers retain significant power to terminate workers' permits at short notice, and while employers may also grant transfer letters to allow their employees to seek alternative employment without being repatriated, there is no legal obligation for employers to provide them. Few do. Given that many workers incur substantial debt to fund their recruitment fees, the threat of the loss of the job and repatriation – with the unwelcome prospect of having to undergo a new and costly recruitment cycle – makes it almost impossible to resist unreasonable demands by their bosses or supervisors. Our regulatory framework gives employers a powerful mechanism of control, which is often leveraged to extract much overtime work, and work on statutory rest days.

Our findings are stark. Excessive overtime work, including the sacrifice of statutory rest days, are a normalised feature of many migrant workers' employment reality. For the purposes of this study, 'excessive' means in violation of law or, if the law is silent, it means a degree of occurrence that the average reasonable person would not want himself to be subjected to because it will be detrimental to his own wellbeing.

Yet our findings also show that violations are not evenly spread among employers. While some employers consistently operate within legal limits, albeit often pushing workers to limits without exceeding them, others demonstrate sustained and extreme violations. In the most severe cases, workers reported labouring up to 16 hours per day, including Sundays, over extended periods spanning months. These conditions contrast sharply with the situation in compliant workplaces. We see a pattern that suggests that excessive exploitation is concentrated within particular companies rather than evenly dispersed across an industry.

This study only pertains to low-wage migrant workers in non-domestic sectors. Domestic workers are not covered by the Employment Act, which is the legislation that sets caps on overtime work.

Background

Singapore has a high proportion of foreign workers, making up more than one-third of its total workforce (Mui Teng 2014). The labour system operates through a complex framework of work passes issued to foreign workers based on skill level and qualifications, but the passes are linked to employers. Singapore's foreign workforce has continued to grow. As of 2025, non-residents comprise approximately 31 per cent of Singapore's labour force, amounting to around 1.91 million workers (Ministry of Manpower, 2025), of which 1.18 million are in the Work Permit category (as at June 2025), the pass type that nearly all low-wage workers hold.

It is a known fact that virtually all migrant workers coming to Singapore for the first time would have paid huge sums of money to recruiters to secure their jobs. Amounts typically range from ten to twenty times their base salary. Even workers coming back for their second, third and subsequent jobs also have to pay, though amounts involved are less.

The indebtedness that results from their having to raise funds (through borrowings) to pay recruiters is inextricably linked to the issue of excessive overtime and the loss of rest days that is the subject of this study. Indebtedness makes workers fearful of losing their jobs, and thus unreasonable demands by employers for long workdays cannot be resisted.

II. Research purpose and questions

The overall purpose of this study was described in the Introduction. In a nutshell it was:

> How many workers with salary claims assisted by TWC2 were working overtime hours per day and per month that were beyond legal limits, and how frequently were these workers required to work on their designated rest days during each month of their claim period?

We speak of a claim period. This would be the span of months for which they had not received their salaries or not received them in full. We only have data for workers' claim periods, since there would be no point collecting and computing their hours for the months when all was well. There is further discussion of this in the section below on the study method and limitations.

The overarching question can be split into three specific questions springing from Part IV of the Employment Act 1968, specifically sections 36, 37, and 38, which regulate rest days, work on rest days, and limits on working hours and overtime.

- Section 36 (Rest Day) requires that every employee be granted one full, unpaid rest day per week, usually Sunday or another day specified by the

employer. This provision in law establishes the legal benchmark for identifying rest-day work.

- Section 37 (Work on a Rest Day) prohibits employers from compelling employees to work on their rest day except in limited circumstances, such as continuous shift work, and mandates greater pay rates (2 times base pay) where rest-day work is required.
- Section 38 (Hours of Work and Overtime) sets maximum limits on overtime work and requires overtime to be paid at no less than 1.5 times the basic hourly rate of pay. Except in emergency situations, employees must not work more than 12 hours in a single day. Total accumulated overtime hours per month is also capped at 72 hours.

Together, these requirements form the legal framework used in this research to assess whether migrant workers exceed lawful working hour limits and how frequently rest-day work (usually Sunday) is demanded from employees.

III. Positionality

As an intern with TWC2, our researcher spent ten weeks working closely with the casework team on salary claims, injury claims, and broader employment-related disputes. This role placed her in a unique position to access data from both ongoing and historical cases, allowing a grounded analysis that reflects the varied experiences of workers navigating the employment claims process. Through sustained one-to-one engagement in casual conversation with workers, often for hours at a time, this research and analysis is also shaped by her understanding of how workers see their lived experiences.

Our intern was acutely aware that she was conducting this research as an outsider. She was not a member of the migrant worker community – the subject of the research – and therefore could not fully know what it is like to experience employment-related legal violations as a foreign worker. As a white woman from a foreign country, she was aware that she was interpreting the data from the periphery of the lived experiences being examined.

IV. Ethical considerations

Ethics were prioritised throughout the research process. Informed consent was obtained from all participating workers, with the purpose and scope of the research clearly explained. Identifying details were excluded from notes and outputs, and confidentiality was maintained through secure data storage accessible only to the research intern and her supervisor. Considerations of reflexivity and positionality were actively maintained in the qualitative analysis to ensure that workers' narratives were represented with an understanding of the results as a co-creation and co-production of knowledge, not an uncovering of an objective truth.

V. Method and limitations

This descriptive, exploratory study uses a mixed-methods case study design to examine excessive overtime and rest-day work among migrant workers with salary claims at TWC2 in 2025.

The bulk of the exercise involved reviewing spreadsheets produced by TWC2 case officers and volunteers to assist migrant workers with their salary claims. These spreadsheets are extremely detailed, listing the start-work and end-work times (also referred to here as clock-in and clock-out times) for each day of a worker's claim period, based on the worker's records or reports.

It should be noted that such detailed calculations are not performed for all salary claimants. Some workers either did their own calculations or had them done by the Tripartite Alliance for Dispute Management, a unit of the Ministry of Manpower that handles salary claims. In such cases, the worker would not be included in our sample set since we would not have sufficient detail in such a client's case records, or sufficient confidence in them.

Whilst TWC2 has salary calculations stored in our database stretching back years, the time availability of the researching intern (ten weeks) – she also had responsibilities helping with ongoing casework – limited the number of cases she could take into the exercise. This being the case, the dataset that was used essentially comprised calculations performed by our TWC2 case officers over the past one year, omitting older cases.

To a large extent therefore, this was a convenience sample, going back in time from the present and using only those spreadsheets with sufficient detail to serve the study's needs. Over the years, TWC2 has far more case records than just the sample set used in this study. Even among the 2025 cases, some salary-claimants' cases were not included in this study because there were data gaps in their records.

The study's limited scale also limits its strength. While a larger sample would have improved reliability, data extraction was time consuming, yet it had to be completed within the ten-week internship period.

Altogether, this study encompassed over 11,400 rows of data, from over 50 migrant workers, who worked for about 50 employers. The average claim was nearly seven months, meaning that the average worker in our sample set had daily data for about seven consecutive months. These figures provide an empirical basis for assessing the scale and regularity of labour practices that may constitute exploitation under Singapore's employment framework.

Concurrently, our intern conducted interviews with workers that comprised six to eight open-ended questions exploring long hours and rest-day work, and whether these practices were perceived as voluntary or coerced. The interviews focussed on respondents' subjective perception of their experiences, enabling a contextualised interpretation of the numerical data. The interviews also allowed for clarification and follow-up questions, particularly given language barriers and the sensitive nature of employment disputes.

Immediately from the interviews, it became evident that the long hours they had to work were always at the request of their employers, not something workers chose for themselves. 'Request' may be too kind a word, as workers find it impossible to reject rosters or shift timings. This informs our understanding of the data; the data represents employer demands, not freely-made choices by workers.

Since our intern was also involved with casework, she made it a point to ask them whether they would like to answer a few questions for a research project, making it clear that this was a separate, anonymous and non-compulsory interview.

The unit of analysis is the individual migrant worker, and participants were recruited through purposive and convenience sampling via TWC2. A secondary unit of analysis was the employer.

Because this research used a narrow and selective data set, its generalisability to the broader population of migrant workers in Singapore has to be limited. We are acutely

aware that our sample was very much drawn from workers whose employers had been defaulting on their salaries to begin with. It may well be that employers who are already breaking one clause in the Employment Act – about paying salaries on time – would feel unbound by other clauses, and therefore would be the kind of employers who would ignore the law regarding working time limits.

That said, workers who come to TWC2 for help over salary non-payment are not known to say that their long working hours were only a feature of their salary-short periods. They tend to say that the long working hours were a feature of the jobs they were in, whether salary was forthcoming or not. So, long working hours do happen to workers even when there is no salary issue.

Moreover, there are other forms of exploitation besides wage theft or overwork; these were not within the scope of this study.

We are also acutely aware that the sample was drawn from workers who made their way to TWC2. Was there something in their help-seeking behaviour that might make them unrepresentative of migrant workers generally? We don't know, but it's a possibility that should not be dismissed.

Related to the above is the fact that most workers seeking help from TWC2 are Bangladeshi workers in the construction industry or the marine and process engineering industries, and this naturally shows up in our sample. About 80 percent of our sample set were Bangladeshi workers from the above industries. 15 percent were Burmese, in construction, food processing (i.e. a manufacturing activity involving food products) or services, including at cafes and restaurants. The remaining 5 percent were from India.

Employers are known to have strong preferences as to which country or countries to source their migrant workers from, shaped too by the Ministry of Manpower's nationality restrictions by industry sector. There may be significance in the way Bangladeshis are over-represented in our casework and consequently, in our sample, especially when other organisations providing help to migrant workers also report a similar profile. This will be discussed further in the Discussion section.

Our sample set does not include a notable group: migrant domestic workers. They are not covered by the Employment Act, and thus the legislation setting out caps on overtime work do not apply to them. This is not to say that there isn't a similar problem of excessively long working hours for them, but it's not part of this study.

The datasets used for analysis are not identical among the three questions (which we also refer to as "headings") concerning rest day work, total overtime per month, or excessive daily overtime, although there is a lot of overlap among them. This is because, for a handful of workers, data may be incomplete regarding one or more of the headings, or a worker may be claiming for non-payment under one heading, but not claiming under the other headings, and so we would not have the data for the latter.

VI. Findings: Working on rest days

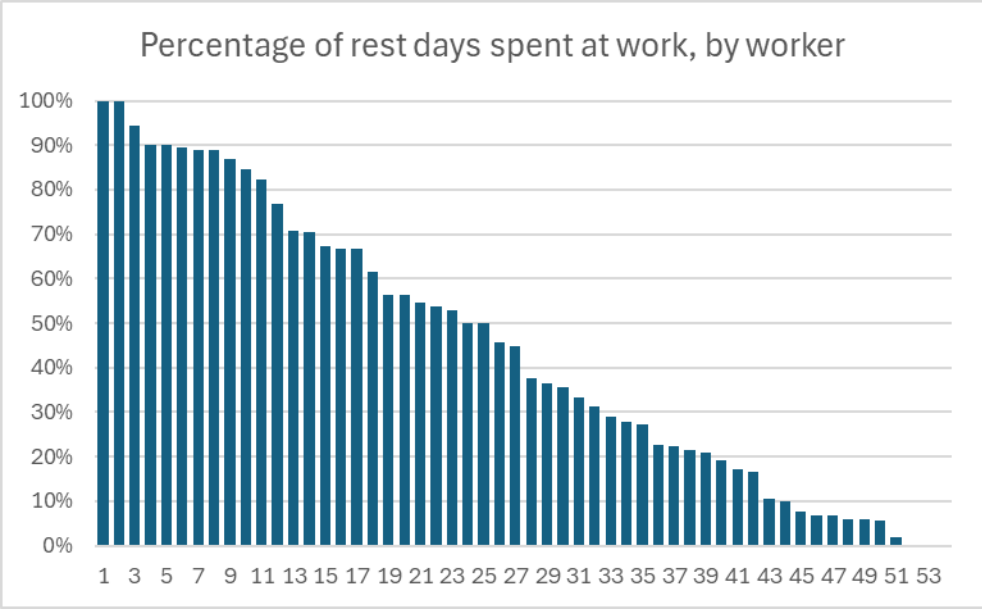
The dataset for this question comprised 54 workers who, together, provided data for 376 months of work. These would be the months for which they were not paid or short-paid. Twelve workers had twelve months or more in their period of claim, but on average each worker's claim period was around seven months.

These 54 workers worked for 47 different companies.

In the graph 6.1 below, each bar represents a worker. The height of the bar (Y-axis) represents the percentage of rest days he worked. Eleven of the 54 workers worked on more than 80 percent of their rest days.

The X-axis represents the workers, ranked 1 to 54. The last three, #52, #53, and #54, did not have to work on any rest day during their claim periods (thus 0 percent).

Figure 6.1:



The worst cases had it really bad. They were required to work on nearly all their rest days. For example, Case #140R, a food processing worker from Myanmar, worked all except five rest days in a whole year. Case 493Q, from India, had only seven days off in the span of thirteen months, but those days were in his first and last months. For eleven consecutive months in between, he worked on every one of his rest days without a break.

Table 6.2: Eleven cases over 80 percent

Case ID	Type of job	Nationality	Gender	No. of rest days in claim period	No. of rest days worked	% rest days worked
401L	Food service	Myanmar	F	12	12	100%
461Q	Food service	Myanmar	F	12	12	100%
485L	Construction	Bangladesh	M	35	33	94%
140R	Food processing	Myanmar	M	51	46	90%
646U	Cook	Bangladesh	M	20	18	90%
921N	Food processing	Myanmar	M	19	17	89%
107N	Construction	Bangladesh	M	9	8	89%
620X	Construction	Bangladesh	M	18	16	89%
493Q	Service	India	M	57	50	88%
761T	Food processing	Myanmar	F	13	11	85%
245Q	Construction	Bangladesh	M	17	14	82%

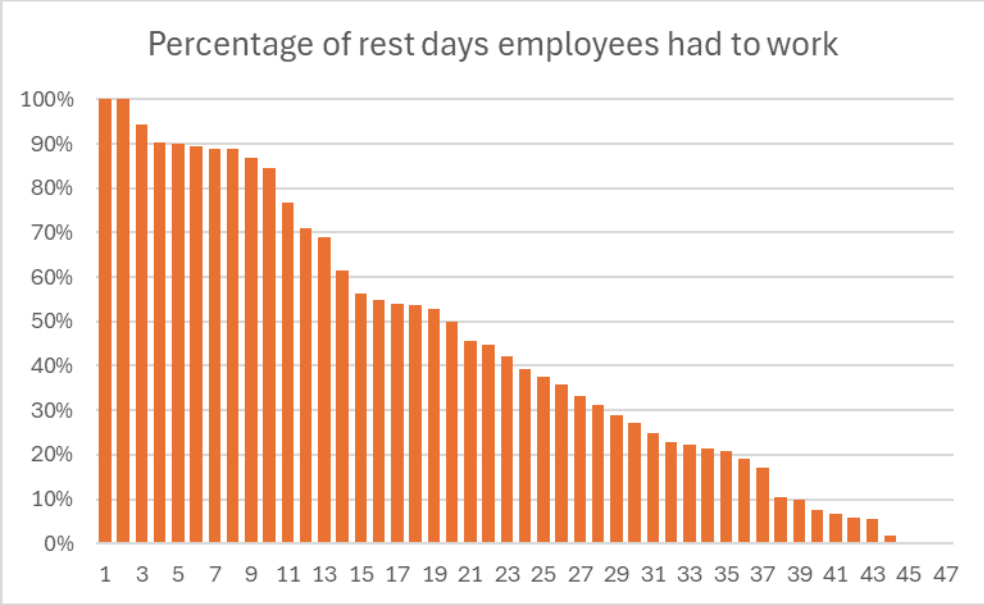
Case 493Q would feature again in the section about long daily hours. Not only was he not getting his rest days, he also had to work ridiculously long hours every day.

Employers and rest days

The next graph examines the issue from the angle of the employer. Each red bar represents an employer; there are 47 of them on the X-axis.

The height of each bar (Y-axis) represents the percentage of rest days that this employer made employee(s) work. Three employers, #45, #46 and #47 did not require their employees to work on any rest day (0 percent).

Figure 6.3:



Five other companies, #40 to #44, only required their employees to work on their rest days occasionally, under ten percent of the time.

By contrast, there were ten employers who made their employees show up for work on more than 80 percent of their rest days.

Our data suggests that demands on employees to work on their rest days vary greatly from one company to another. Some workplaces seem to require a high frequency of rest day work, while other workplaces do not require it at all. This suggests structural reasons (employer demands) rather than incidental need to work on some rest days to cope with business fluctuations.

The Employment Act does not prescribe any absolute minimum of rest days in a month that must not be rostered away. It simply says in Section 37(1) that "an employee must not be compelled to work on a rest day", with very narrow exceptions. Clearly, the law assumes that outside of those exceptional circumstances, any request to work on a rest day is to be negotiated between employer and employee.

Why does our dataset contain 54 workers but only 47 employers?

This is because a few of the workers in our dataset had the same employer. In such an instance, the percentage of rest-day violations calculated for the employer would combine the data for the two or three employees under him.

However, the reality for migrant workers is that, with attenuated bargaining power, it is unrealistic for them to decline to be rostered for rest day work. The threat of losing the job and being repatriated hangs over them like the proverbial Sword of Damocles.

From our interviews with workers, we heard from many of them that they never questioned their employer when asked to work on Sundays, though the workers added that, if given the option, they would take the day off. One worker shared, when asked what would happen if he asked not to work on Sunday, that

> "I want to work less but if the company has a job I have to do it, my employer says if I don't work on Sunday, then he will send me home. As long as there is work, then I have to work."

Many workers voiced a similar sentiment of not questioning their employers' instructions and seemed to laugh when asked about choosing not to work on their

rest day. This reaction indicated that in their lived reality, rest day work was not a choice; it was not negotiable. Instead, workers found themselves having to trade away the welfare and well-being associated with rest for promised wages – that were often underpaid or unpaid. And this trade would have come about under threat of losing their jobs should they demur.

VII. Findings: Overtime hours per month

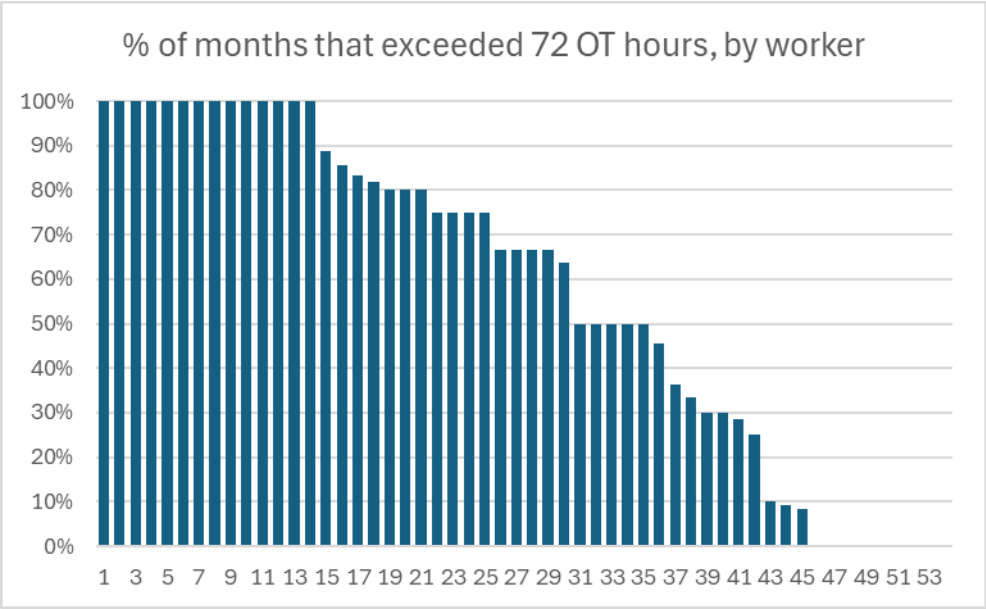
Section 38(5) of the Employment Act states that no worker should be made to work more than 72 overtime hours in any month.

For this section, the dataset comprised 361 worker-months from 54 workers' claim documentation. These workers were employed by 48 employers.

Each bar in the graph 7.1 represents a worker; the X-axis thus comprises 54 workers, ranked. The Y-axis represents the percentage of the months in a worker's claim period wherein he exceeded the legal maximum of 72 overtime (OT) hours. There were 14 workers with 100% violation – they worked more than 72 overtime hours in every month of their claim period.

Claim periods vary from one worker to another, from as little as one month to as many as fourteen months. So, 100% may mean a short period (one month) of excessive overtime or a very long stretch of many months. Table 7.2 on the next page looks at the 14 workers who reported 100% violation in greater detail.

Figure 7.1:



Towards the right edge of graph 7.1, there were nine workers, #46 to #54, who did not report exceeding 72 hours of overtime in their claim periods. The height of their bars was zero percent.

The next table looks at the 14 workers who worked more than 72 overtime hours in every month of their claim periods.

Table 7.2: Fourteen cases, every month >72 hours overtime

Case ID	Type of job	Nationality	Gender	No. of months in claim period	No. of months >72 hours overtime	Percent violation
140R	Food processing	Myanmar	M	12	12	100%
493Q	Service	India	M	12	12	100%
061W	Food service	Myanmar	M	11	11	100%
693X	Aircon	Bangladesh	M	11	11	100%
450P	Food service	Myanmar	F	9	9	100%
992R	Construction	Bangladesh	M	9	9	100%
813Q	Construction	Bangladesh	M	6	6	100%
245Q	Construction	Bangladesh	M	4	4	100%
585X	Construction	Bangladesh	M	4	4	100%
646U	Cook	Bangladesh	M	4	4	100%
921N	Food processing	Myanmar	M	4	4	100%
581M	Construction	Bangladesh	M	3	3	100%
406M	Construction	Bangladesh	M	2	2	100%
461Q	Food service	Myanmar	F	2	2	100%

Four of the 14 workers in this subset endured excessive overtime for eleven or twelve months in a row. Three more endured this for six months or more. The exhaustion that results is difficult to comprehend if one were not in their shoes.

A closer look at the details reveals what these dry numbers mean for the workers involved. Generally, these workers did not merely exceed the legal maximum of 72 hours by a matter of minutes or even an hour per day. The illegally extra overtime they had to work was considerable.

Two examples, 061W and 493Q, illustrate this.

Case 061W's worst month was May 2025. He performed 141.5 hours of overtime work – double the legal maximum. This came about because he had to work from 07:00h to 20:30h every weekday and Saturday. He had to be on duty for 13.5 hours a day, with only a one-hour meal break.

Table 7.3 Case 061W
Overtime hours each month compared to legal maximum

Month	Overtime hours worked	Overtime hours allowed by law	Excess hours	Overtime hours as % of legal maximum
Dec-24	94.0	72.0	22.0	131%
Jan-25	97.0	72.0	25.0	135%
Feb-25	88.0	72.0	16.0	122%
Mar-25	98.0	72.0	26.0	136%
Apr-25	102.0	72.0	30.0	142%
May-25	141.5	72.0	69.5	197%
Jun-25	87.0	72.0	15.0	121%
Jul-25	100.0	72.0	28.0	139%
Aug-25	97.0	72.0	25.0	135%
Sept-25	85.0	72.0	13.0	118%
Oct-25	100.8	72.0	28.8	140%

Case 493Q's numbers are even worse. This Indian national had 12 full months in his claim period, and he worked more than 72 hours a month for every one of those 12 months. He also had to work on every rest day through a span of eleven months. That's virtually a whole year without day off.

Table 7.4 Case 493Q
Overtime hours each month compared to legal maximum

Month	Overtime hours worked	Overtime hours allowed by law	Excess hours	Overtime hours as % of legal maximum
Mar-24	146.0	72.0	74.0	203%
Apr-24	136.0	72.0	64.0	189%
May-24	150.5	72.0	78.5	209%
Jun-24	155.0	72.0	83.0	215%
Jul-24	119.5	72.0	47.5	166%
Aug-24	121.5	72.0	49.5	169%
Sept-24	102.5	72.0	30.5	142%
Oct-24	130.6	72.0	58.6	181%
Nov-24	133.5	72.0	61.5	185%
Dec-24	164.0	72.0	92.0	228%
Jan-25	158.5	72.0	86.5	220%
Feb-25	154.1	72.0	82.1	214%

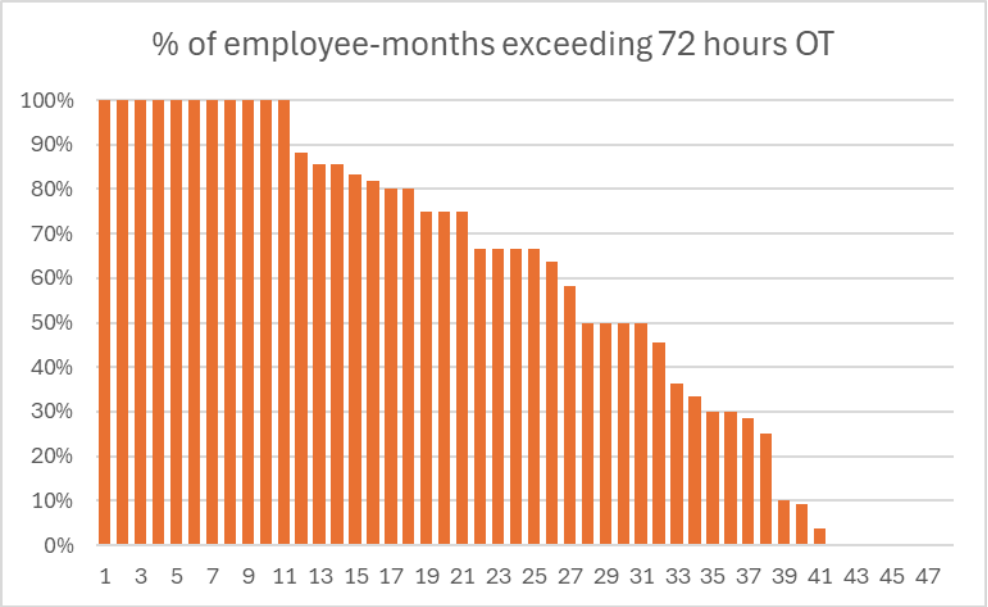
His worst month was December 2024 when he clocked 164 overtime hours – this does not include his rest day working hours – which was 228% of the legal maximum. However, December was not exceptional. In six months out of the twelve, his overtime hours were more than 200% of the permitted limit.

Case 493Q worked from 07:00h to 21:00h daily, and that's how those overtime hours added up. But even worse than that, he also worked the same hours on his rest days.

Employers and the 72-hour monthly limit

Looking at the data from the angle of employers, for which there are 48 in this dataset, this is what the graph looks like.

Figure 7.5:



Each bar in the Graph 7.5 represents an employer; the X-axis thus comprises 48 employers. The Y-axis represents the percentage of months in the employee(s) claim(s) that exceeded 72 hours of overtime. Many employers had just one employee in this dataset, but a few employers had more than one. In such an instance, we aggregated all the employees belonging to the same employer and their months to arrive at a percentage for the employer.

There were eleven employers with 100% violation. They each had just one employee in our dataset, and the employee worked more than 72 hours in every month of his or her claim period.

Employer #12 in Graph 7.5 had an aggregate violation of 88%. This construction employer had three employees in our dataset. Two of these men had four months in their claim period and one man had nine months in his claim period (total 17 months). On 15 of these 17 months, the employee was working more than 72 hours of overtime, thus giving a score of 88% for this employer.

Employer #13 in this graph had two employees in the dataset. It was also a construction company. One man had a claim period of two months and the other, five months (total seven months). On six of these seven months, the employee worked more than 72 hours of overtime, giving a score of 86% for this employer.

At the opposite end of the graph, only seven employers had a score of zero – their employees did not work more than 72 hours overtime in any month. Three other employers had low scores of 10% or less.

That meant that that the great majority of employers (38 out of 48, or 79% of them) were quite regularly making their employees work more than 72 overtime hours each month. The distribution once again indicates that excessive overtime is not an occasional occurrence but a recurring pattern at many companies, while other companies make effort to stay within the law regarding working hours (even as they flout the law regarding payment of salaries).

When made to do so much overtime, is there time left for a worker to attend to his personal needs or other activities important to them? From the conversations conducted with workers in association with this study, we received varied responses. One participant explained that although working overtime was not his choice, he preferred working long hours for the extra income he can earn.

> "I am happy to work overtime because I have three boys at home in Bangladesh, two in high school and one in university. When I first came to Singapore, I enjoyed my free time here, but now I am only here to work. I do not speak to others. I have no friends at my current job. I go to work and go home. I am only focused on sending money home to my family."

Another participant spoke about his concern with balancing work and family commitments in his home country.

> "I have no time to call my family. Often, I have to call them during my lunch break. Sometimes I work from 6am until 4am. On these days, I get only two or three hours of sleep. I have no time to rest, I work very hard, and I am very tired. I do not have time for sleep. I do not have time for personal things."

It was common for participants to cite daily communication with family members as deeply important to them, and to be aggrieved that excessive hours compromised those relationships. Not only does overwork and excessive overtime negatively affect physical health, it also impacts workers' mental health.

VIII. Findings: Daily working hours

Section 38(8) of the Employment Act states that "an employee must not under any circumstances work for more than 12 hours in any one day" with narrow exceptions, generally of an emergency nature. The language in the legislation is unusually strong: "under any circumstances…."

We have already cited two examples (Case 061W and Case 493Q in the preceding section) who were regularly made to work 13.5-hour and 14-hour stretches every day.

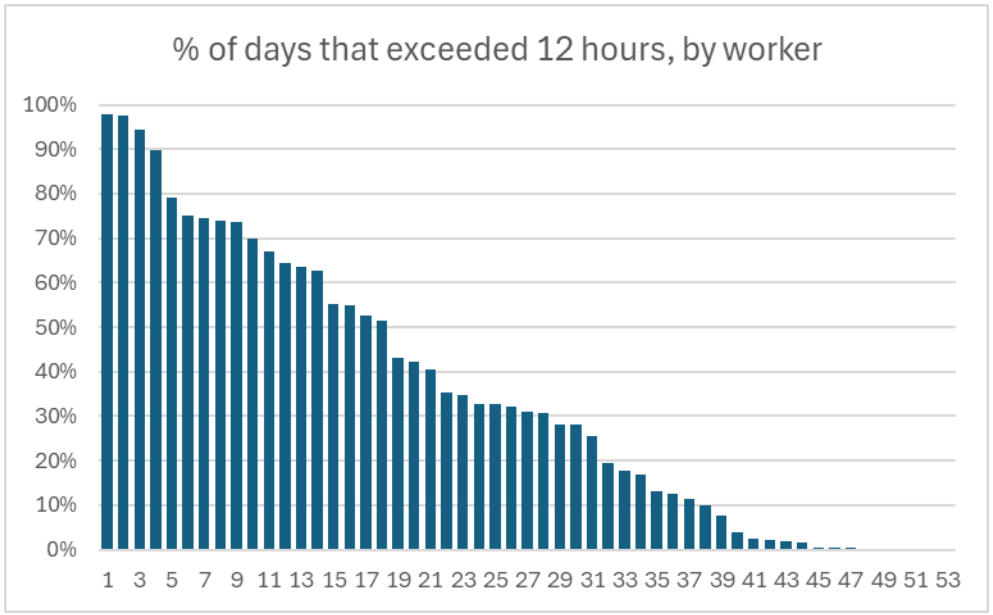
But even among workers who didn't have to work such illegally long stretches every day, they nonetheless had to work illegally long stretches on many days in a month. This section takes a look at the data we have regarding this.

The dataset for this section comprises time records for 8,797 working days from 53 workers' salary claims. We found that 3,022 of those days saw the employee working

more than the legal maximum of 12 hours. That's 34% of the total number of working days that we reviewed.

In the graph below, each bar represents a worker (X-axis). The height of the bar (Y-axis) indicates the percentage of his working days in which he worked more than 12 hours.

Figure 8.1:



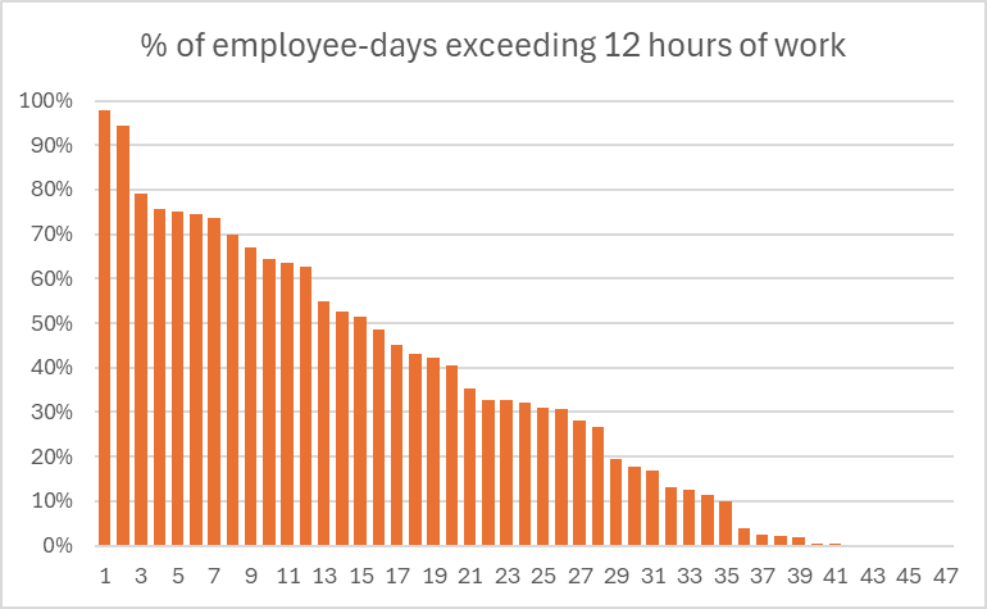
A significant number of workers consistently recorded workdays lasting over 12 hours in breach of the law. Eighteen out of the 53 workers in this dataset (34%) reported such a violation on half or more of their working days. For many workers in our dataset, being made to work such long hours is a routine feature of their employment experience.

As mentioned in Section V (Method) above, they couldn't have been doing this out of their own volition, unlike, say, a gig worker, who works relatively independently. For workers in our datasets, given the nature of their jobs as part of a crew, they would have been rostered to work these hours by their employers.

Employers and the 12-hour daily limit

In the next graph, each bar represents an employer, of which there are 47 in this dataset. The height of the bar indicates the percentage of days that the employer required their employee(s) to work more than 12 hours.

Figure 8.2:



Only eight employers scored zero percent (good). Four other employers violated the law only occasionally (less than 10% of employee-days) which may be explained by expected work circumstances.

In contrast, 35 of 47 employers (74%) violated the law frequently enough to suggest a scheduling practice that gave short shrift to compliance with law. This suggests that demands for excessively long workdays overtime is normalised and routinely practised within certain workplaces, rather than arising from exceptional needs. It also indicates weak enforcement of legal protections.

Right up to the line

When we reviewed the data, we observed that many workers reported start-work and end-work times that showed them working 12-hour days consistently, which meant that while their employers were careful to stay within the law, they did so by going right up to the line in their rostering.

We can see this by cross-referencing compliance with two different rules:

(a) No workday should exceed 12 hours;
(b) Total overtime hours in any month must not exceed 72.

If an employee consistently works exactly 12 hours a day, which generally means four hours of overtime on top of eight base hours (it's a different split for Saturdays), then within about 18 days, the cumulative overtime hours will cross 72.

Case 019L illustrates this. The Bangladeshi construction worker had eleven months in his claim period. In eight of those months, there was not a single day in which he worked more than 12 hours. Even in the other three months, it didn't happen often. Yet, he exceeded the 72-hour rule in five of his eleven months. In March and July 2025, he exceeded the cap even when there was not a single day in which he worked more than 12 hours.

Table 8.3 Case 019L
Violation of monthly maximum though daily limit not breached

	Legal limit: 12 work hours per day		Legal limit: 72 overtime hours per month	
Month	Days worked in the month	Days with >12 work hours	Total overtime hours in that month	Overtime hours as % of legal maximum
Dec-24	29	5	80.4	111.7%
Jan-25	25	0	60.8	84.4%
Feb-25	26	0	65.4	90.9%
Mar-25	28	0	74.8	103.8%
Apr-25	27	0	68.1	94.6%
May-25	27	0	68.1	94.6%
Jun-25	25	0	59.4	82.5%
Jul-25	29	0	73.4	102.0%
Aug-25	28	2	75.8	105.2%
Sept-25	28	4	93.8	130.2%
Oct-25	20	0	51.4	71.4%

Even in September, when the worker exceeded 12 hours on only four days (he worked from 08:00h to 22:00h on each of those days) the total overtime for the month quickly ballooned to 93.8 hours, or 30% more than the legal maximum, which is a significant violation.

Extreme exhaustion

The examples which we have looked more closely at so far (Cases 061W, 493Q and 019L) were cases in which the worker managed to tolerate excessive hours for many months.

Our dataset also contains cases with much shorter claim periods, and where the violations were so severe that the worker could not tolerate the abuse for long.

For instance, Case 245Q, also a Bangladeshi construction worker, worked slightly more than four months, including the full months of July to October 2025. Except for three days in August, he was working more than 12 hours a day on every working day. Unsurprisingly, his total monthly overtime was extremely high, about three times the legal maximum.

Table 8.4 Case 245Q
Extreme violation of both daily and monthly caps

	Legal limit: 12 work hours per day		Legal limit: 72 overtime hours per month	
Month	Days worked in the month	Days with >12 work hours	Total overtime hours in that month	Overtime hours as % of legal maximum
Jul-25	28	28	217.8	302.5%
Aug-25	30	27	215.8	299.7%
Sept-25	30	30	236.8	328.9%
Oct-25	31	31	243.1	337.6%

We have records of Case 245Q's start-work and end-work times. He typically had to start work at 06:10h every morning, going off work only at 22:00h or 23:00h. These times applied even on Sundays.

Case 245Q is not even the worst. Another worker in a similar situation whom we interviewed said of the impossible position he found himself in within days of arriving in Singapore to start on a new job:

> "I only arrived in Singapore five days ago. Before I came here my agent told me that a few days a month I would have to work overtime hours while still being paid only my basic salary per month. I was okay with this because I needed the money. But, since I started, I have been working 9am until 4am every day. I told my boss I need at least 7 hours of sleep. I begged him. He said no, and if I want to change companies, that he can give me a transfer letter, but it would cost me $2500, otherwise he would cut my permit on Monday and send me home. What am I supposed to do?"

As an aside, the worker's report that the employer wanted to charge him for the "benefit" of a transfer letter is very troubling. No employer should be asking for kickbacks; it is against the law. Yet, the employer was only all too ready to extract money from his employer, leveraging the powers that our foreign worker regime has given him.

IX. Discussion

Our findings demonstrate that the scope and enforcement of employment laws are insufficient to prevent workers from experiencing structural and intersectional disadvantages. Many workers enter Singapore having paid substantial fees to recruitment agents and are subsequently compelled to comply with their employers' demands under threat of termination and repatriation. It is evident that employers with knowledge of the powers given to them under Singapore's permit framework can exploit these vulnerabilities for material gain. This is the reality of Singapore's labour migration system.

Specifically, our findings highlight how excessive working hours and rest day work form part of the structural conditions in migrant labour employment. They are persistent and, in noticeable cases, extreme, rather than occasional experiences borne out of infrequent and unexpected workflow situations.

On the other hand, a minority of employers in our dataset do seem not to engage in such behaviour, which indicates that labour law violations are deliberate and concentrated within specific firms rather than randomly distributed across industry sectors. However, once placed in a non-compliant workplace, workers have limited capacity to resist excessive hours without risking dismissal or repatriation.

That our sample set was drawn from workers who had come to TWC2 because of grievances over unpaid salaries gives rise to both a strength and a weakness of this study.

The weakness is that our findings are not generalisable to migrant workers and employers of migrant labour as a whole. Violations regarding overtime and rest day work may be unusually concentrated in companies that are also errant with salary obligations – though it may not. We are unable to say how strong the association is between work hours and work day violations on the one hand and salary violations on the other.

The strength of our study is that it shows regulators a useful entry point for action. It demonstrates the potential of salary claim data as a tool for identifying systemic labour law non-compliance and informing more targeted regulatory interventions, since our study has shown that workers who present with unpaid or underpaid salary claims often also experience multiple forms of labour law violations including excessive hours. It should be a matter of operating policy that every case of salary non-compliance reported to the authorities should be examined (by the authorities) for other violations. It is likely, as our study shows, that such investigation will yield effective results.

Our qualitative findings from interviews highlight the broader social and emotional costs of excessive overtime, the loss of time for rest, recovery, and family communication. Many workers expressed distress over their inability to maintain regular contact with family members despite identifying this as central to their wellbeing. These impacts extend beyond the workplace, reinforcing social isolation.

We should also acknowledge the social protection motivation behind the legislation in the first place. These limits are intended to protect workers from tiredness and exhaustion which may lead to an increased risk of accidents and injury – a public policy concern. That these limits are written into legislation also suggests that legislators were concerned about the unequal bargaining power between employers and employees such that these risks might not be addressed merely through private negotiation.

Legislation is meaningless without enforcement, and this is true not just with employers delinquent over salary payments, it is equally true over excessive hours.

The current approach of the Ministry of Manpower, seeing non-payment or under-payment as merely a civil dispute between parties, is completely inadequate. Not only is the unequal bargaining power again allowed to rear its ugly head in the mandatory mediation process, it is present even in the Tribunal process because of the fact that employers control much of the documentation needed as evidence.

More relevant to this discussion here is another result of salary disputes being routinely treated as civil disputes instead of criminal violations: it is that excessive hours, visible in the details (clock-in and clock-out times) of the salary claims, are also ignored from an enforcement perspective, even when there are clear laws on these.

This is most unsatisfactory. It possibly explains why our study has uncovered such widespread and egregious violations. Employers probably see it as unlikely that they will be taken to task for rostering their staff the way they do. A sense of impunity has been ingrained.

TWC2 strongly urges the authorities to close the gap between formal legal protections and enforcement in practice. We have shown that a good entry point would be to

examine all salary disputes for parallel violations of law regarding work days and work hours.

Our study's results point to the value of expanding research and analysis beyond casework data to experiences of more workers generally, even when no salary dispute is in play.

The indebtedness that many migrant workers find themselves in after having had to raise money to pay recruitment fees suggests that overtime work, as some of our respondents have explained, is seen by them as a way to earn as much as possible as quickly as possible. In turn, this can lead to a situation where they may be working excessive hours, to the detriment of their health and wellbeing, but because the employer is not defaulting on their salaries, no case is filed with the authorities. We need to understand the scale and extent of the problem on a wider canvas.

It's also worth circling back to a mention we made in the Method section that our sample set was dominated by Bangladeshi workers, with Myanmar workers as the second-most numerous group. This is the pattern in TWC2's salary casework generally. Whether this means that these two nationalities are particularly vulnerable to salary non-payment and excessive work hours is unknown. The study did not seek to research the question of whether such abuses are concentrated among certain nationalities or, for that matter, in certain industries. It is possible though that Bangladesh and Myanmar citizens are perceived as the most desperate to find work abroad, often paying large sums for their recruitment, as TWC2 has found in earlier studies. As a result, employers intent on setting long working hours might have a preference for hiring them, seeing them as more compliant.

Future research looking more specifically at differential experiences by nationality or industry would also be useful.

References

Mui Teng. 2014. Managing International Migration for Development in East Asia: Chapter 10: Singapore's System of Managing Foreign Manpower. Research Paper. Lee Kuan Yew School of Public Policy, National University of Singapore. Accessed December 12, 2025. https://lkyspp.nus.edu.sg/docs/default-source/ips/pa_mt_managing-international-migration-for-development-in-east-asia-research-papers_240215.pdf.

Singapore. 1968. Employment Act. Revised edition. Singapore: Government of Singapore. Accessed December 12, 2025. https://sso.agc.gov.sg/Act/EmA1968.

May, Tim, and Beth Perry. 2021. Social Research: Issues, Methods and Process. Open University Press. Accessed December 12, 2025. https://research.ebsco.com/linkprocessor/plink?id=44bdb5da-d54c-3da7-af61-a44bbfbfb079.