**Comments from Transient Workers Count Too for the CEDAW Committee on Trafficking in Women & Girls**

1). Singapore is a highly developed but small country in a region of less developed countries with significantly lower levels of productivity and per capita income. While many Singaporeans work and study overseas, Singapore is very much a destination country for migrants. By far the largest component of the migrant workforce are those regarded as being semi-skilled, who are employed on work permits or limited duration and who perform the work that Singaporeans don’t want to do at the salaries available: in construction, shipyards, and domestic work.

Nearly 250,000 migrant women, mostly from Indonesia, the Philippines and Myanmar, are employed as domestic workers. An increasing number of migrant women are employed in retail and services. Some migrant women are employed as sex workers and in bars.

Singapore has strong border controls and tries to manage strictly the entry and employment of migrant workers. Nevertheless, the desire of many people from the region to find paid work in Singapore, as well as that of various employers to find low-cost workers, has resulted in a certain amount of irregular migration and employment in violation of Singapore laws, though this is on a small scale compared to the legal employment of migrant workers.

2). Female migrant workers generally give as their number one reason for seeking work in Singapore the need to support their families, but that is generally true of the men too.

Domestic workers employed through regular routes come via agencies and normally do not pay their recruitment fees in advance. These are paid by their employers to Singapore agencies and then deducted from the workers salaries over a period of months, normally between six and nine, during an initial contract period of two years. Some women come by irregular routes, particularly those from Myanmar, whose government currently bans them from migrating to work. Many are assisted by recruiters to obtain employment offers before leaving their country, which they do declaring that they are tourists. TWC2 considers that this leaves Myanmar domestic workers particularly exposed to exploitative treatment and abuse.

While domestic workers have had a recognised right to weekly days off (in force since January 2013), their work permit conditions allow for workers and employers to agree that the worker may give up her days off in return for payment. In practice, it is hard for a worker to refuse to accept such an arrangement, or to withdraw her consent even if she initially gave it willingly out of a wish to repay her recruitment costs more quickly. Our research suggests that 35 per cent or more of domestic workers have no days off, and many of them are allowed little or no independent contact with the outside world by their employers.

Many employers want to hire workers who they see as pliant and unquestioning, and this disposes them to seek young women (also Myanmar women, who are stereotyped as more submissive than Filipinos or Indonesians). The minimum age for employment as a domestic worker is 23, which was thought to preclude the employment of minors, and yet cases emerge from time to time of girls (under-18s) being employed through the use of false documentation obtained in their countries of origin. They find it hard to seek help, as they have broken Singapore law and this exposes them to abusive treatment.

The recruitment of girls and young women often takes place over their heads, with initial moves being made by a recruiter who approaches their parents and urges the desirability of their daughter being employed abroad upon them: they then encourage their daughter’s agreement. There may not be much choice in the matter.

3). Singapore has long had legal measures against trafficking and its parliament passed the Prevention of Human Trafficking Act in November 2014. In the following year, it acceded to the Palermo Protocol. It has an Inter-agency Taskforce on Trafficking in Persons that brings together the Ministry of Home Affairs, police and Ministry of Manpower to deal with policy issues and exchange information. However, the policy emphasis, in the view of migrant worker rights NGOs, has tended to be on punishment of wrongdoers under the law, and less on a victim-centred approach that prioritises protection and support for those thought to have possibly been trafficked.

A real problem is the persistence of labour conditions that bear many typical features of trafficking without those who endure them strictly being identifiable as having been trafficked. The sponsorship system gives employers undue power over workers; the obligation for domestic workers to live in their employers’ homes, combined with, in many cases, the denial to them of a weekly day off; the common practice of employers taking control of domestic workers’ passports (in violation, we argue, of Singapore’s Passport Act) and in some cases, taking away their mobile phones and tightly restricting their ability to communicate with the outside world – all these are conditions that, in other circumstances, might be seen as suggesting that trafficking might be involved. Real cases of trafficking might stand out more distinctly if the general position of migrant workers, and domestic workers in particular, was improved to get rid of these practices that disempower workers and make them vulnerable to exploitation.

Each year, the task force produces a report that includes figures on the number of trafficking cases reported and investigated. They have included cases involving women sex workers and some cases of men alleged to have been trafficked into labour exploitation. Few have been found by the authorities to be valid, though they sometimes accept that the workers in question have been treated exploitatively and have sought to give them a degree of protection and, in some (male) labour cases, have allowed a change of employment.

4). The taskforce mentioned above is the national agency for collecting data and developing policy. NGOs and the public are invited to submit information on suspected trafficking cases they encounter.

5). While TWC2 considers that trafficking as such is comparatively rare in Singapore, we think that the prevailing conditions of employment of significant sectors of the migrant worker labour force make it difficult to separate out and recognise trafficking victims, as well as being unjust and objectionable in themselves. It is our view that the raising of standards for migrant workers’ pay and access to justice, a more flexible employment regime that does not tie legally employed migrant workers to one employer regardless of compatibility and conditions and leaves them vulnerable to threats of repatriation in the event of complaint, as well as determined action to bring down recruitment costs, would radically alleviate this problem, rendering the worst cases of exploitation more readily visible.

Specifically concerning domestic workers, we think that the weekly mandatory day off should really be mandatory, though as a step towards that, we suggest that two days off each month should be made compulsory and non-negotiable. Domestic workers who, for whatever reason, find that they are unable to get along with their employers, should be able to seek alternative employers without seeking their existing employers’ permission or leaving Singapore and going through the employment process all over again. Countries of origin should implement zero fees policies for the recruitment of domestic workers (they exist in the Philippines, but often do not seem to be effectively enforced); Singapore should do away with the fees that are currently permitted too (one month’s salary equivalent for each year of employment up to a maximum of two months for two years).

Overall, there should be more sharing of information with NGOs on trafficking cases reported and investigated, including on the rationale behind findings reached by the authorities.

John Gee, Head of TWC2’s Research Sub-Committee, 10/2/2019