



WHAT IS ACCEPTABLE ACCOMMODATION?





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INTRODUCTION

Currently, migrant domestic workers (hereafter, MDWs) in Singapore are mandated to live with their employer, with policy mandating that ‘acceptable accommodation’ is to be provided. The ambiguity of the term ‘acceptable’ means that there are huge disparities in the experiences of MDWs in these spaces. While some employers are able to provide a separate bedroom for their employee, whether it is a large room or a smaller ‘maid’s room’, many other employers’ homes do not have the space for this. In these circumstances, different approaches are taken to accommodate MDWs, affording different levels of comfort, privacy, and opportunity for rest.

To determine how the existing policy is understood and enacted, 45 MDWs were interviewed and asked about the accommodation they had been provided in all of the different homes that they had worked in. While some of this group had only worked in one household, a few others had resided in Singapore for more than three decades and had lived with over eight employers. As such, this report provides detail of the sleeping spaces that were provided for MDWs in 118 different households.

In interviews, MDWs reported a variety of sleeping arrangements, from sharing rooms with children or elderly family members, to sleeping in storage cupboards, and other communal spaces. In these sites, MDWs reported being unable to get privacy, or rest when their work is finished. Rather, they are forced to wait until other members of the household have gone to sleep, or are also resting, so that they too can do the same. As this report will show, some MDWs lived with body aches and in discomfort as their sleeping spaces were uncomfortable and/or too hot or cold to get restful sleep. If sharing a room with another member of the household, MDWs also reported concern about getting unwell as they have no place to recover. Beyond this, some of the MDWs interviewed said that they felt uncomfortable sleeping in communal spaces as they felt more exposed to unwanted sexualised attention.

For decent living and working standards to be achieved for MDWs, there needs to be better regulation of the accommodation that is to be provided by employers. As such, this report details five key policy recommendations that need to be enacted. In brief, these are as follows:

- 1. Policy should be made more specific, to detail exactly what is meant by ‘acceptable’ accommodation.*
- 2. Every effort should be made for MDWs to be given their own room to sleep in. Otherwise, at a minimum, they should be given storage space, a mattress, and time for rest/relaxation in private.*
- 3. If a MDW is required to sleep in the room of a family member so that they can provide specialised care to a family member (which often results in ‘round the clock’ care), they should be compensated for this.*

4. *MDWs accommodation should be checked upon more regularly and they should be allowed to change jobs freely if their accommodation or living conditions are deemed inadequate.*
5. *Live-out options should be given to MDWs. In space-scarce Singapore where apartments usually do not have dedicated rooms for domestic workers, MDWs who are living in their own accommodation may have more living space, and are able to live more comfortably. Allowing MDWs to live out will give employers and MDWs a chance to choose a living and working environment that best suits them. Employers and MDWs can agree on a salary that will cover the MDW's accommodation, transport and food needs, as well as the working hours that the MDWs are to abide by.*

Only when all MDWs are given safe and comfortable sleep spaces where recuperation (whether they are unwell or not) is possible, and with ample opportunity to get rest and privacy, will decent work be possible.

CURRENT POLICY AND MOM ADVICE

Within the Employment of Foreign Manpower Act (Chapter 91A), and relating specifically to employers of MDWs, policy states that:

“The employer shall ensure that the foreign employee has acceptable accommodation. Such accommodation must be consistent with any written law, directive, guideline, circular or other similar instrument issued by any competent authority.”

While no further guidance is legislated, the Ministry of Manpower (hereafter, MOM) has issued further advice on its website to help employers. Significantly, despite being promoted, this further advice is not legislated. Under the heading ‘Rest days and well-being for foreign domestic worker’, the MOM states that:

You must ensure that your FDW’s accommodation meets the following requirements:

- **Adequate shelter:** the accommodation must adequately protect your FDW from environmental elements such as sun, rain or strong winds.
- **Basic amenities:** you must minimally provide your FDW with a mattress, pillow, blanket, bathroom amenities and toiletries. Examples of toiletries include soap, shampoo, toothbrush, toothpaste, etc.
- **Sufficient ventilation:** your FDW’s accommodation must be sufficiently ventilated. Mechanical ventilation (e.g. electrical fan) must be provided if natural ventilation is inadequate.
- **Safety:** your FDW must not sleep near any dangerous equipment or structure that could potentially cause harm or hurt to her.
- **Modesty:** your FDW must not sleep in the same room as a male adult or teenager. If you install video recording devices at home, you must inform your FDW of the devices and where they are placed. You must not install them in areas that will compromise her privacy or modesty, e.g. where she sleeps, change clothes, or the bathroom area.
- **Space and privacy:** you should provide your FDW with a separate room. If that is not possible, you must ensure that her accommodation has adequate space and privacy.

METHODOLOGY

The findings in this report, and subsequent policy recommendations, are a result of interviews conducted with 45 different MDWs in Singapore, which were completed between 2016 and 2017, and eight of whom were then interviewed again more recently in 2020 and 2021. In these interviews, MDWs were asked about their employment conditions and specifically about the space they were given to sleep. If they did not offer more information themselves, they were then asked if they could offer more detail about how living in these spaces felt. As many of the MDWs interviewed had been employed in multiple households they were able to comment on accommodation provided in all of these homes. As such, 118 sleeping spaces have been considered in this report.

Of the 45 MDWs interviewed, 29 were residents at the HOME shelter. While many of the shelter residents had lived in particularly challenging circumstances prior to their move to HOME, more than half of this group had worked in more than one household, so were able to compare their experiences across more than one household. In addition to interviews, a series of group focus group discussions were completed, after art-based (drawing particularly) methods were engaged with. With this, MDWs were asked to draw the home spaces in which they were living and working, and they were then asked to describe their experiences in these households. In these exercises, more detail was given about the participating MDWs accommodation. Of the MDWs interviewed, 23 were from the Philippines, 17 from Indonesia, four from Myanmar, and one was from India.

To note, no names have been used in this report to ensure that the anonymity of those interviewed is maintained.

KEY FINDINGS

The table that follows details the different kinds of sleeping spaces and arrangements that the MDWs interviewed reported. While there were some variances in these spaces (the sizes of these rooms, whether they had windows, and how many children were in a room, for instance) they have been grouped to form broad categories.

Description of accommodation/sleeping-space provided by employing household	No. of MDWs who reported this kind of space
Private sleeping space	
Traditional maids' room (private, with mattress, very small space, no AC, some with window, others without)	38
Own large bedroom (varying in size, but all with a bed. ample space, a window, and some with AC)	15
Sub-Total	53
In a room with other members of the household	
Elderly relative's bedroom (either on bed or mattress on floor)	14
Child's/children's bedroom either on bed or mattress on floor)	17
With other MDWs in a shared bedroom (2 MDWs were in groups of 2 but one slept in group of 8)	3
Employer's bedroom (three with an elderly employer, but two with a younger employer)	5
Shared bedroom with elderly relative and child (in both cases, on a mattress on floor)	2
Sub-Total	41
In a communal space	
Living room (either on a roll-out mattress or on the sofa)	9
Storage room (some described as cupboards, others as small rooms)	6
Balcony (on a sofa, they would rotate between this and sleeping on the living room sofa)	1
Kitchen (one on roll out mattress, one on a towel)	2
Communal hallway (in both cases, on a mattress on floor)	2
Office/Study (all on a mattress on floor)	4
Sub-Total	24
Total MDWs Interviewed	118

The key findings from the interviews conducted are as follows:

- 53 households provided a separate bedroom for their employee; all of which also provided mattresses, pillows, bedding, and a door for privacy.
- Of those MDWs' who did not have their own room, the majority (41) slept in a bedroom with another member of the household; usually an elderly relative or a child (or several children). Of this group, 3 MDWs were required to sleep in a room with other MDWs (most often in pairs, but one interviewee reported sharing a room with 7 other MDWs).

Most of these MDWs were then either given their own storage space for their clothing and belongings, or some shelving in a shared unit (wardrobe or chest of drawers). All of this group were given their own mattress, but some were expected to roll/move it away each morning, and several reported uncomfortable sleeping spaces.

The majority of the MDWs who slept with young children said that they did not mind doing so but did highlight the challenges of not having any privacy, particularly if they wanted to call their own family members after they finished work, and once the child(ren) had gone to sleep.

Those who had to share a space with an elderly relative reported mixed experiences. Some felt uneasy if they had to share a room with an older male, and others commented on having disturbed sleep because of the noise made by their roommate. All MDWs said that in this situation they would end up working more, sometimes through the night, as the person they shared a room with would request things of them regardless of the time. In these circumstances, contacting their own family members during their rest time was also a challenge.

- 24 households required a MDW to sleep in a communal space, such as a kitchen, corridor, or living room. All of the MDWs who had experienced this kind of accommodation commented on the lack of privacy they felt with this. Several MDWs in this group were given very thin mattresses, while others were expected to sleep on the sofa. One MDW was given only a towel to sleep on, under the kitchen table on a tiled floor. She had a thin blanket and pillow but reported feeling aches and being uncomfortable for the months she worked in that household.
- 6 households required their employee to sleep in a store room, and 4 in an office. While these were communal spaces, many of these MDWs said that they preferred this arrangement to sharing a space with a member of a household, as they had some privacy. However, some others were uncomfortable as they had barely enough space to lie flat, and/or were hot/cold because of a lack of ventilation in the space.

- One MDW interviewed was required to sleep on a sofa that was placed on a balcony. Sleeping under the balcony above, she was not protected from insects or the weather and suffered greatly.

ILLUSTRATIONS OF SLEEPING SPACES *DESCRIBED BY INTERVIEWEES*

The following illustrations, completed by Gabi Froden,¹ depict the sleeping spaces described by some of the interviewees. While some MDWs interviewed did have photos of these spaces, the illustrations were commissioned to bring a visibility to the spaces described, while maintaining their anonymity, and the anonymity of their employers.



a maid's room

Many MDWs described sleeping in a compact 'maid's' rooms. Most often, these were described as having a small window but barely any room to store possessions. The interviewee whose room is depicted here said that she had just enough room to store her things down the side of her bed. She said that the door to her room barely opened however, as the mattress took up most of the floor space. She said that she would squeeze around it each evening, climbing over her possessions onto her mattress. She said that her room was always warm as it had no AC, and only a small ceiling fan,

¹ Gabi is an illustrator, writer, and designer. Her works can be found here: <http://www.gabifroden.com/>

but said that she was grateful for the privacy and to “have a space I can call my children at night-time”.



in a child's bedroom

Being expected to sleep in a room with a child, or multiple children, was shown to be common amongst interviewees. While some MDWs who slept like this shared that they had no problem with this, as they were given time in the day to call their families, and had a comfortable mattress, pillow and blanket, others were given very little space to sleep, and were not given any privacy or rest time during the day. Due to this, these interviewees found calling their families very difficult. The interviewee whose sleep space is depicted here said that while she had enough space for her roll-out mattress, and felt comfortable enough when sleeping, she got no privacy other than when she used the bathroom. She admitted that she would sneak snacks into the bathroom and use her phone in there while the shower ran, in order to talk to her children. She said that when she was unwell, she would be allowed to lay on her mattress, but added, “I cannot rest properly then when the daughter is home from school. Then if she need the room of course its hers, so I cannot complain or have quiet.”.



next to an elderly relative

Several of the MDWs who had to sleep with elderly male relatives described feeling uncomfortable with their lack of privacy. Additionally, every MDW who was expected to sleep with an elderly relative, whether male or female, reported having to work through the night on occasion. As the interviewee whose sleeping arrangement is portrayed here explained, “if amah wants water, I go get. Sometimes she wants tea, sometimes foot rub, of course I do. She also sleep very loud and move a lot, hard for me to sleep because my mattress is right there by her” In an interview, she explained that she had a small chest of drawers to store her possessions, but like many other MDWs who shared room with a household member, rarely had privacy or time to call her family. This MDW added, “I have some of my things by my bed but if I try to rest, to read the bible even, amah want

me to do something for her. Always ‘get this’, ‘get that’, never I have time to do call my children, only on my off day”.



in a large bedroom of their own

Some employers had homes that were big enough to give their MDW a large bedroom. The majority of the 15 MDWs who had ample private space to sleep in also felt better rested and happier in their employment than many of the other MDWs interviewed. One of the interviewees, who volunteers with HOME on their days off, said “I work for my employer for 12 years and I am very happy. I have a big room and can take rest when I finish my work each evening. I feel happy to work with this family. It’s very different from other employer because I can call my family when I want, and they even buy me gifts when its Christmas and my birthday. I have photo on the wall and feels like I am at home there”. Having a large bedroom did not, however, mean that all the MDWs with this arrangement had unanimously positive experiences. One of the interviewees said that while she had privacy, her employer would only give her very limited time to rest, as she would work from 6am to 12am most

days. She said that her employer was “very strict” adding that “my ma’am don’t like me to sit down and have CCTV everywhere. Even I am very tired I am always standing.”



on a sofa in the living room

Nine of the interviewees said that they would sleep in the living room. While one MDW said that this arrangement was fine for her, as her employers would go to their rooms early enough for her to rest properly, the remaining eight said that they rarely had privacy, and were regularly unable to sleep when they wanted to. One of the interviewees said that she had a sofa towards the back of the living room, where she would try to sleep while her male employer would watch the television until the early hours of the morning. She said that on some occasions, she would be up until 2am as the television was so loud, only to then wake at 6am to get breakfast ready for her employer’s

children. She also added “the sofa is OK, comfortable, but if I am tired or feeling sick, no place to lie down in the daytime. Cannot rest there anytime, just at night.”



under a table in the kitchen, on a towel

Two of the MDWs interviewed said that they were required to sleep in the kitchen of their employer’s homes. One of these MDWs said that she slept on a roll-out mattress which she could put on a folding bed frame that she could collapse down each morning. She said that she didn’t mind this arrangement for the most part, as she could go to sleep as soon as she had finished cleaning the kitchen and was rarely disturbed in there in the evening. She said there was a bathroom just by the kitchen where she stored her belongings, and where she could wash up. The other MDW interviewed, however, was given just a thin pillow and towel to lay on, and a light blanket to put over her. She said that with this arrangement, she was incredibly uncomfortable. She

said that she was instructed to put this under the kitchen table as there was little room in the house. She said that she would stretch each morning but always felt sore, especially down her sides. While she did not work for this employer for a long period, she said that she felt exhausted as she was expected to clean and cook all day, after getting limited rest.



in a storage cupboard

The storage cupboards/rooms that the MDWs interviewed described sleeping in varied considerably. Some were entire rooms, that also gave them privacy, others were spaces that household members would come in and out of regularly to collect items or complete tasks in (such as laundry or even exercising). The MDW whose sleep space is depicted here described sleeping in a tiny space with barely enough room to lay down. She said that she had to sleep surrounded by food and other household items, with shelves above her head that made her feel claustrophobic. She said that she would either sleep at an angle, or with her legs tucked up on her thin roll-out mattress but added that she was often uncomfortable. She stored some possessions at the bottom of her bed, and others in a set of drawers in the bedroom of one of the children. She explained, “the family stuff was all in there, food even that don’t fit in kitchen. The room is just near the entrance to

the apartment. Have door but if I close then its dark and too hot, so I always leave open a little. No plug socket so difficult to charge my handphone also”.



on a balcony, on an old sofa

One MDW explained that they would sleep in different communal spaces but was often made to sleep on a sofa on a balcony of her employer’s home. She described this arrangement as very uncomfortable, as they were left unprotected from the rain, cold breezes, insects, and hot morning sun. They explained, “there is cover above from another balcony but still I get wet sometimes. I feel sore on my skin, in my body. It very very bad.” While this was only reported on one occasion, this MDW felt unable to report this as they didn’t feel their employers were violating any labour laws. While these sleeping conditions do not meet the MOM’s description of “adequate shelter” in their additional details on what constitutes acceptable accommodation for MDWs (aforementioned on p.

3 of this report), as the sleeping space was not protected from “environmental elements such as sun, rain or strong winds”, this is not legislated.

POLICY RECOMMENDATIONS

Given the diversity of accommodation offered by different employers to MDWs, and the challenges associated with these formats, the following policy recommendations are being made. These changes would make a step towards ensuring decent working conditions are achieved for MDWs living and working in Singapore.

1. Policy should be made more specific, to detail exactly what is meant by 'acceptable' accommodation. For instance, accommodation should provide shelter from the elements, safety, privacy, and comfort. The Ministry of Manpower (MOM) already has a list of guidelines for what an employer should provide with regards to accommodation (see: <https://www.mom.gov.sg/passes-and-permits/work-permit-for-foreign-domestic-worker/employers-guide/rest-days-and-well-being>), but this needs to be codified in legislation.
2. Every effort should be made for MDWs to be given their own room to sleep in. If this is an impossibility in space-scarce Singapore, then they should be given ample space to store their belongings, a private place to change and wash, and a full single mattress to sleep on. They should be given adequate time and space to rest in private so that they are able to restore their energy, call their families, and recover from their work.
3. If a MDW is required to sleep in the room of a family member so that they can provide specialised care to a family member (which often results in 'round the clock' care), they should be compensated for this, either by way of payment, or through compensatory rest.
4. MDWs accommodation should be checked upon more regularly. In addition to the highly welcomed new measures that have been taken to strengthen support for MDWs (through household visits, the expansion of interviewing practices, the post-placement checks by employment agencies, the enhancement of the six-monthly medical examination, and the implementation of a mandatory monthly rest day for MDWS), MDWs should also be allowed to change jobs freely if their accommodation or living conditions are deemed inadequate.
5. Live-out options should be given to MDWs. In space-scarce Singapore where apartments usually do not have dedicated rooms for domestic workers, MDWs who are living in their own accommodation may have more living space, and are able to live more comfortably. Allowing MDWs to live out will give employers and MDWs a chance to choose a living and working environment that best suits them. Employers and MDWs can agree on a salary that will cover the MDW's accommodation, transport and food needs, as well as the working hours that the MDWs are to abide by.