From Precarity to Protection: Examining the Platform Workers Act

Introduction

Platform workers (PWs) are individuals engaged in platform work agreements with operators for services such as ride-hailing or delivery.[1] As self-employed individuals, they enjoy flexibility in determining their work hours and schedules – a key factor that drove the uptake of gig work, particularly in the aftermath of the COVID-19 pandemic. Over the past decade, the gig economy has grown rapidly in Singapore, with 70,000 PWs accounting for roughly 3% of the country's workforce in 2023.[2]

Yet, platform work is inherently high-risk, with PWs often facing precarious working conditions, limited workplace protections and financial insecurity. These issues are further exacerbated by the decentralised and flexible nature of platform work, which render traditional employment protections challenging to implement. The Platform Workers Act (PW Act), which came into effect in January 2025, is well-timed. Formulated based on recommendations provided by the Advisory Committee on Platform Workers,[3] the PW Act seeks to reduce the vulnerabilities of PWs and improve assistance mechanisms. It aims to protect their rights, support their financial stability with provisions for Central Provident Fund (CPF) contributions and provide them with insurance coverage through guidelines for the Work Injury Compensation Act.[4]

This case study examines the challenges experienced by PWs in Singapore, particularly considering evolving industry trends and policy responses. Despite the flexibility offered by platform work, they face systemic issues such as financial insecurity, insufficient workplace protection and limited representation. Further, their classification as 'self-employed' restricts access to benefits typically offered to regular employees. The case study also explores the role of Platform Work Associations (PWAs) in addressing these issues, highlighting their limitations in providing effective, long-term solutions. By analysing these dynamics, the case study discusses potential policy options, with a particular focus on the PW Act. It examines how the provisions under the Act address gaps while identifying areas where challenges persist.

Background

Despite the appeal of gig work, recent data from the Ministry of Manpower's 2024 Labour Force Advance Release shows a second consecutive annual decline in the number of PWs, possibly reflecting a shift toward salaried employment opportunities.[5] Nonetheless, platform work continues to serve as an important livelihood option, particularly for those valuing the flexibility it offers.

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[1] Ministry of Manpower, "Platform Workers," accessed January 10, 2025, https://www.mom.gov.sg/employment-practices/platform-workers-act/platform-worker.
[2] Kok Yu Feng, "What You Need to Know about the New Platform Workers Bill," *The Straits Times*, September 10, 2024, https://www.straitstimes.com/singapore/politics/what-you-need-to-know-about-the-new-platform-workers-bill.
[3] Ministry of Manpower, "Government Accepts Recommendations by the Advisory Committee on Platform Workers," November 23, 2022, https://www.mom.gov.sg/newsroom/press-releases/2022/government-accepts-recommendations-by-the-advisory-committee-on-platform-workers.
[4] Attorney-General's Chambers, "Platform Workers Act 2024 - Singapore Statutes Online," accessed January 10, 2025, https://sso.agc.gov.sg:5443/Act/PWA2024.; Ministry of Manpower, "CPF Contributions for Platform Workers," accessed January 10, 2025, https://www.mom.gov.sg/employment-practices/platform-workers-act/cpf-contributions-for-platform-workers.
[5] Kok, "What You Need to Know."

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The Profitability Dilemma

As a modern economic innovation, the gig economy has seen rapid expansion and job creation.[6] However, its long-term profitability remains uncertain for many platform operators within the sector.[7] The pressure to achieve high growth in its initial stages has incentivised platform operators to underprice their services, appealing to potential customers while offering attractive pay rates, bringing in more PWs, resulting in enormous losses in hopes of leveraging a higher market share.[8] While investors have been partial to providing initial funding for these operators, they now expect a return as these platforms mature. With companies prioritising larger profit margins, companies are likely to raise prices of their services while simultaneously cutting costs.[9]

Shifting Demographic Trends

The shift in demographic trend is especially concerning given the two primary demographics of PWs. First, younger workers often take up gig work for supplementary income and flexible hours. On the other hand, seniors (aged 60 and above) and non-tertiary educated individuals, who are transitioning to retirement or struggling to secure traditional employment, form a significant and growing proportion of the workforce, as seen between 2023 and 2024.[10] This demographic trend indicates a growing vulnerability among PWs, marked by a shrinking overall workforce and an increasing proportion of older individuals. Consequently, this shift heightens the potential for exploitation,[11] lower collective bargaining power[12] and diminishes the leverage necessary for PWs to advocate for their rights with platform operators.

Problem

The problems that PWs face are directly linked to their classification as 'self-employed' rather than employees. This status severely restricts their access to key protections and benefits typically afforded to regular employees, including compensation for work-related injuries, workplace safety measures and membership to representative bodies with the legal authority to engage in disputes with employers.

Financial Insecurity and Unsustainability: CPF and Housing

PWs face significant financial insecurity and unsustainability, rooted in systemic gaps within the gig economy.[13] The lack of stable income, inadequate CPF contributions and limited access to emergency funds collectively undermine their ability to achieve long-term financial security. These challenges expose platform dependency and create disparities in financial well-being between PWs and regular employees.

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[6] Nasyrah Adbul Rohim et al., "Temporary Work Growing More Popular among Employees and Employers, Say Recruitment Firms," *CNA*, August 27, 2024, https://www.channelnewsasia.com/singapore/gig-work-temporary-contract-freelancers-employers-employees-4569606.
[7] A. E. R. Temp, "Profit Challenges Faced by Gig Economy Companies," The Global Recruiter, February 27, 2024, https://www.theglobalrecruiter.com/profit-challenges-faced-by-gig-economy-companies/.
[8] John Colley, "Gig Economy: Ride-Hailing and Takeaway Firms May Not Survive the Cost of Living Crisis," The Conversation, June 7, 2022, http://theconversation.com/gig-economy-ride-hailing-and-takeaway-firms-may-not-survive-the-cost-of-living-crisis-184581.
[9] Colley, "Gig Economy."
[10] Ministry of Manpower "Report: Labour Force In Singapore Advance Release 2024," accessed January 10, 2025, https://stats.mom.gov.sg/Pages/mrsd-labour-force-in-singapore-advance-release-2024.aspx.
[11] Hadis Mosafer et al., "Factors Associated with Financial Exploitation in Older Adults: A Systematic Review," *Geriatric Nursing* 61 (2025): 662-71, https://doi.org/10.1016/j.gerinurse.2024.10.028.
[12] International Labour Organisation, "Collective Bargaining and Labour Relations," January 28, 2024, https://www.ilo.org/topics-and-sectors/collective-bargaining-and-labour-relations.
[13] Matthew Matters et al., "Current Realities, Social Protection And Future Needs of Platform Food Delivery Workers in Singapore," *IPS Working Paper* no. 47 (2022): 1-169, https://lkyspp.nus.edu.sg/ips/news/details/ips-working-paper-no.-47-current-realities-social-protection-and-future-needs-of-platform-food-delivery-workers-in-singapore?fbrefresh=638720558191233834.

Income Dependency and Fluctuations

The financial insecurity PWs face stems from their exclusion from mandatory CPF contributions, depriving them of a critical safety net for housing and retirement savings. CPF contributions, particularly to the Ordinary Account, are essential to finance property purchases, service housing loans and accumulate savings for retirement.[14] Thus, without these contributions, they face significant barriers to meet their long-term financial needs. Moreover, platform dependency, where PWs rely heavily on platform work for income, renders them especially vulnerable to market volatility.[15] Unpredictable finances and fluctuating earnings thus leave many of them unable to plan or save effectively.

This reality is evident in worker sentiment. Many PWs, specifically younger PWs are acutely aware of these vulnerabilities, with many supporting mandatory CPF contributions as a policy to address housing needs.[16] Despite this, the pre-PW Act landscape of voluntary matching contributions from platform operators or government top-ups through the Workfare Income Supplement to selective, lower earning individuals was inadequate,[17] leaving PWs living pay check to pay check and prioritising daily survival over long-term planning.[18] Furthermore, long hours often required for platform work reduce opportunities for leisure or family time, further exacerbating their quality-of-life challenges.[19]

Disparities in Financial Security

The financial disparity between PWs and regular employees further underscores the systemic inequities in the gig economy. A full-time young PW accumulates only about 10% of the CPF savings of an employee with similar earnings.[20] This disparity is particularly evident in housing, where PWs can finance only 20% of their housing loans through CPF, unlike employees who can fully finance theirs.[21] Moreover, only one in four older PWs meets their cohort's Basic Retirement Sum (ie a pay-out disbursed upon retirement), leaving most ill-prepared for retirement despite potential alternative savings sources.[22]

This widening gap further threatens the financial sustainability of PWs. For the second consecutive year, they spent more than they earned, depleting savings to meet rising living costs.[23] This precarious financial situation hinders their ability to transition to other types of work, as unstable income and limited time prevent participation in upskilling programmes.[24] Traditional employment offers a more sustainable path with opportunities for skill-building and career growth. In contrast, PWs often experience skill stagnation and limited opportunities, resulting in a cycle of horizontal mobility as they move between similar roles without

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[14] Central Provident Fund Board, "CPFB CPF Overview," accessed January 10, 2025, https://www.cpf.gov.sg/member/cpf-overview.
[15] Lau Deborah, "Young Gig Workers Need Educating on Harsh Realities of Platform Work, Say Researchers of 'in-Work Poverty'," *Today,* March 29, 2023, https://www.todayonline.com/singapore/young-gig-workers-educate-harsh-realities-job-academics-nus-2140281.
[16] Matters, "Current Realities."
[17] Central Provident Fund Board, "CPFB Workfare Income Supplement," accessed January 10, 2025, https://www.cpf.gov.sg/member/growing-your-savings/government-support/workfare-income-supplement.
[18] Zalizan Taufiq, "Poll Showing 6 in 10 Food Delivery Workers Were Injured at Work Warrants 'Better Look' at Medical Claims: Koh Poh Koon," *Today*, October 11, 2022, https://www.todayonline.com/singapore/poll-food-delivery-workers-injured-medical-claims-koh-poh-koon-2016841.
[19] Taufiq, "Poll Showing 6 in 10 Food Delivery Workers Were Injured at Work."
[20] Ministry of Manpower, "Strengthening Protections for Platform Workers: Report By Advisory Committee On Platform Workers," accessed January 10, 2025, https://www.mom.gov.sg/-/media/mom/documents/press-releases/2022/strengthening-protections-for-platform-workers-report.pdf
[21] Ministry of Manpower, "Strengthening Protections."
[22] Matters, "Current Realities."
[23] Khor Khieng Yut, "Platform Workers Are Spending More than They Earn; Savings in 'Unhealthy Range': DBS Study," *The Straits Times*, November 15, 2024, https://www.straitstimes.com/business/platform-workers-are-spending-more-than-they-earn-savings-in-unhealthy-range-dbs-study.
[24] Ang Hwee Min, "S$4,000 SkillsFuture Top-up Will Push Workers to Upskill, but Employers' Support Is Key: HR Experts," *CNA*, February 18, 2024, https://www.channelnewsasia.com/singapore/skillsfuture-credit-workers-budget-2024-courses-4131176.

achieving upward progression.[25] This issue is especially pronounced for older PWs and PWs without tertiary education, who struggle the most in breaking out of this cycle.[26]

Challenges with Emergency Medical Funds

Exacerbating the issues of long-term financial insecurity, PWs face difficulties in managing short-term financial needs, particularly in building emergency medical funds through MediSave. As they frequently encounter workplace hazards,[27] MediSave is critical to cover medical expenses from injuries or chronic conditions.[28] However, many PWs struggle to meet MediSave contribution requirements. Before the PW Act, they had to manually contribute to MediSave, which created cash flow challenges as contributions were only made known to them the following financial year.[29] This delay often left them unable to set aside the required funds, with nearly half failing to make contributions punctually.

While PWAs provide emergency financial relief through initiatives like short-term aid, these programmes come with restrictive eligibility requirements that limit accessibility. For example, some relief schemes are contingent on prior PWA membership, some with a minimum membership period requirement of three months. Consequently, PWs often shoulder medical costs independently, adding to their financial strain. The lack of a safety net not only heightened their vulnerability to income shocks but also limited their ability to respond to unexpected crises, often forcing them to work through injuries.[30]

Inadequate Workplace Protection

On top of financial insecurity, the lack of protective mechanisms renders PWs more vulnerable to their high-risk work environments. Their classification as 'self-employed' excludes them from legal protections mandated by law to regular employees, resulting in a significant disparity in workplace safety measures. Unlike employees, PWs are not entitled to benefits under the Work Injury Compensation Act and the Workplace Safety and Health Act, despite the inherent risks in platform work.

Lack of Compensation Measures

Despite working in high-risk environments, PWs are excluded from protections provided for by the Work Injury Compensation Act, such as medical leave wages, medical expenses and lump sum compensations for incapacity or death.[31] In contrast, regular employees are entitled to these claims if they sustain injuries or contract diseases at work. The lack of coverage leaves PWs without formal mechanisms to claim compensation for work-related injuries. This is especially concerning given their susceptibility to road accidents while at work. In 2022, one-third of food delivery riders were found to have encountered at least one accident that required medical attention.[32] Some food delivery workers even reported that they would operate their vehicles at higher speeds to complete their deliveries more quickly, rendering them more vulnerable to serious injuries.[33]

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[25] Pillai Sharanya, "Upskilling for Gig Workers Poses Different Problems Needing Different Solutions," *The Business Times*, February 21, 2023, www.businesstimes.com.sg/startups-tech/upskilling-gig-workers-poses-different-problems-needing-different-solutions.
[26] Lau, "Young Gig Workers Need Educating on Harsh Realities."
[27] Nicholas Young, "Singapore's Gig Workers Worry New Benefits Could Mean Lower Pay," Rest of World, September 24, 2024, https://restofworld.org/2024/singapore-gig-worker-protection-law/; Matters, "Current Realities."
[28] Kimberly Lim, "MOM Working with Food Delivery Firms to Improve Safety after 5 Riders Killed on Roads in 18 Months," *Today*, July 5, 2022, https://www.todayonline.com/singapore/mom-working-improve-road-safety-food-delivery-riders-deaths-1935196.
[29] Dinesh Dayani, "Pros And Cons Of Requiring Compulsory CPF Contributions For Platform Workers," *Dollars and Sense*, December 13, 2022, https://dollarsandsense.sg/pros-cons-requiring-compulsory-cpf-contributions-platform-workers/.
[30] Goh Swee Chen, "Closing the Gap of Adequate Work Injury Compensation for Platform Workers," *The Business Times*, December 6, 2022, https://www.businesstimes.com.sg/opinion-features/closing-gap-adequate-work-injury-compensation-platform-workers.
[31] Ministry of Manpower, "Types of Compensation under WICA," accessed January 10, 2025, https://www.mom.gov.sg/workplace-safety-and-health/work-injury-compensation/types-of-compensation.
[32] Matters, "Current Realities."
[33] Matters, "Current Realities."

These statistics underscore the hazardous nature of platform work and the heightened risks PWs encounter on a daily basis. Furthermore, this phenomenon was more predominant amongst PWs who generated more income from food delivery work. This suggests that financial pressures and performance incentives may motivate riskier behaviour among them, further exacerbating their vulnerability to road accidents. Taken together, the absence of legal safeguards, coupled with the inherent dangers of platform work, stress the need for stronger protective measures for PWs.

While PWs may receive short-term financial assistance from their respective PWAs to make up for work-disrupting injuries, compensation comes in the form of grocery vouchers. While vouchers can help offset living expenses to free up income for medical fees, this approach has notable drawbacks. The lack of direct medical subsidies means that injured PWs must bear the upfront costs of treatment, which can be financially burdensome. More worryingly, this may result in a delay of treatment for those who cannot immediately afford healthcare services, hindering their recovery process and consequently, their ability to work.

Absence of Workplace Safety Guidelines

Prior to the introduction of the PW Act, platform operators were not obligated to ensure the safety of PWs, leaving the latter without structured safety guidelines and preventive measures typically mandated for traditional employees. For instance, employers are legally obligated by the Workplace Safety and Health Act to maintain a safe working environment for their employees and are required to "conduct risk assessments to identify hazards and implement effective risk control measures."[34] However, this responsibility was not extended to platform operators prior to the introduction of the PW Act. Hence, occupational health and safety measures implemented by platform operators were voluntary. These initiatives primarily involve workshops and training sessions.[35] The voluntary nature of these initiatives allows platform operators to avoid accountability for unsafe working conditions. As a result, PWs continue to face high-risk work environments without adequate systemic protections.

Lack of Official Representation

Another problem PWs face is the absence of official institutions to represent their interests. Given their self-employed status, they are unable to unionise and engage in official negotiations with platforms to improve their employment conditions. At present, three PWAs have been established under the Freelancers and Self-Employed Unit of the National Trades Union Congress (NTUC), namely, the National Taxi Association for taxi drivers, the National Private Hire Vehicles Association for private-hire vehicle drivers, as well as the National Delivery Champions Association for freelance delivery workers.[36] Though parked under the country's national trade union centre, these associations were formed as part of NTUC's advocacy efforts to increase protective mechanisms among the platform work community and are still considered unofficial.[37] Despite their presence, these associations are hampered in their ability to effect substantial change for the following reasons: limited capacity, lack of formal mandate for representation by PWAs, and low membership and awareness.

Limited Capacity

The Industrial Relations Act regulates employer-employee relationships by facilitating negotiations and dispute resolution. Trade unions are authorised to represent their members in negotiations with employers

[34] Ministry of Manpower, "WSH Act: Responsibilities of Stakeholders," accessed January 10, 2025, https://www.mom.gov.sg/workplace-safety-and-health/workplace-safety-and-health-act/responsibilities-of-stakeholders.
[35] Grab, "Grab to Promote Health and Occupational Safety Standards in Singapore," October 16, 2018, https://www.grab.com/sg/press/social-impact-safety/grab-to-promote-health-and-occupational-safety-standards-in-singapore/.
[36] U FSE, "About U FSE," accessed January 10, 2025, https://www.ufse.org.sg/about-us/about-ufse.
[37] National Trades Union Congress, "Increased Wages, Better Injury Coverage for Platform Workers after New Law Passes," August 29, 2024, ntuc.org.sg/uportal/news/More-muscle-for-NTUC-platform-worker-associations-after-new-law-passes-in-Parliament/.

pertaining to employment conditions.[38] If these negotiations remain unresolved, trade disputes can be referred to the Ministry of Manpower for conciliation assistance and afterwards, the Industrial Arbitration Court for adjudication should conciliation efforts fail. However, the legal mechanisms through which trade disputes are managed between employers and employees do not apply to PWs. While PWAs are crucial in establishing a sense of community among PWs while enabling the possibility of collective bargaining, this potential cannot be translated into substantive action given their unofficial status. PWAs are unable to engage in formal dispute management discussions with platform operators, limiting the scope of issues which can be negotiated on while preventing the establishment of official dispute resolution measures.[39]

At present, PWAs primarily provide financial assistance to registered members. Most prominently, the NTUC Care Fund (Work Injury Relief) supports injured PWA members by offering S$250 NTUC Fairprice grocery vouchers to offset income losses resulting from their injuries. However, eligibility for this scheme requires claimants to have been registered as members of one of the three PWAs for at least three months.[40] This requirement suggests that access to support is contingent upon prior membership, thereby excluding new PWA members who sustain injuries in the first three months of their membership.

PWAs also provide PWA-specific schemes, including National Delivery Champions Association's Short-Term Accident Relief Fund that aims to "ease financial burden [due to] injuries sustained [during] freelance delivery work."[41] Similar to the NTUC Care Fund (Work Injury Relief), the Short-Term Accident Relief Fund also requires a minimum membership of one month accompanied by a minimum NTUC union membership of three continuous months. This again highlights the limited access to financial support schemes among new members of PWAs.

Furthermore, support from PWAs mainly consists of cash subsidies or vouchers, instead of direct governmental fund top-ups or similar benefits. While these subsidies may offer temporary relief, they do not contribute to long-term savings for medical or retirement needs. The PWAs' reliance on cash-based subsidies highlights the absence of systemic protections that ensure consistent protection for PWs. Additionally, the aforementioned model of support places the onus on PWs to proactively seek membership in PWAs and anticipate delays in accessing the financial assistance schemes due to predetermined eligibility conditions. By requiring PWs to be aware of and prepared for such delays, they may eventually rely on self-funded sources rather than PWA schemes for support.

Lack of Formal Mandate for Representation by PWAs

On top of their limited capacities to effect change, PWAs lack internal mechanisms to ensure that the interests of all PWs under each association are represented both adequately and fairly. Given the geographically dispersed and transient nature of platform work, it is especially challenging for PWAs to engage their members consistently, address concerns across various issues and formulate a cohesive representation framework that accounts for the needs of all their members.[42] Additionally, some PWs may view PWAs primarily as sources of financial assistance rather than avenues for collective bargaining. Their focus on swift financial relief may divert their attention away from efforts to negotiate with platform operators for systemic improvements in employment conditions. This weakens the collective bargaining power of PWAs by limiting active participation and engagement from PWs.

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[38] Ministry of Manpower, "Industrial Relations," accessed January 10, 2025, https://www.mom.gov.sg/employment-practices/trade-unions/industrial-relations.
[39] Kok Yu Feng, "NTUC Plans to Form Union-like Bodies for Platform Workers If Draft Laws Are Passed," *The Straits Times*, August 29, 2024, https://www.straitstimes.com/singapore/ntuc-plans-to-form-union-like-bodies-for-platform-workers-if-draft-laws-are-passed.
[40] U FSE, "NTUC Care Fund (Work Injury Relief)," accessed 10 January 2025, https://www.ufse.org.sg/resources/ntuc-care-fund.
[41] National Delivery Champions Association (Singapore), "Assistance Schemes," accessed January 10, 2025, https://ndca.org.sg/membership/financial-assistance-schemes/.
[42] Ministry of Manpower, "Government Accepts Recommendations."

Unclear Membership and Participation Rates

While the total number of members in each PWA is published annually, membership rates (ie the percentage of the overall platform workforce that is registered) are not announced. Though absolute membership numbers have demonstrated year-on-year growth, it remains unclear what proportion of the total platform workforce they represent. At present, the National Delivery Champions Association is the only PWA for which a membership rate can be inferred, based on data from a separate study. In 2022, only 39.5% of surveyed food delivery riders were registered members of the National Delivery Champions Association or other associations that represented the interest of PWs.[43]

Policy Options

Singapore's approach to address issues in the gig economy through the PW Act reflects the government's commitment to establish a standardised framework to improve the employment conditions of PWs.[44] As one of the leading nations in this effort, Singapore's adoption of predefined criteria approach provides upfront clarity for both platform operators and PWs while maintaining the flexibility of platform work.[45] During the deliberation process, the following alternatives were considered:

Reclassification of PW Status

One alternative was to re-classify PWs as employees, as other countries including Spain, Belgium and Portugal have done. This would entitle them to employment rights such as fixed hourly wages, sick pay and vacation leave. In the local context, the re-classification of PWs as employees would require platform operators to mandatorily contribute to their CPF, and extend compensatory rights under the Work Injury Compensation Act to them.[46] However, while this reclassification affords them greater protection, it concurrently limits the working flexibility that PWs enjoy (eg deciding how much, and when to work) as they would be required to adhere to predetermined working requirements as outlined in their employment contracts.[47]

Case-by-Case Approach to Resolving Issues

An alternative approach is to settle PW conflicts on a case-by-case basis, allowing flexibility in decision-making tailored to individual circumstances. In the United Kingdom (UK), for example, courts have played a central role in determining the employment status of PWs. In 2021, the UK Supreme Court ruled in *Uber BV v Aslam* that Uber drivers were, in fact, workers – not independent contractors. Being categorised as workers entitled them to certain employment rights, including receiving the minimum wage each time they have the Uber app switched on within the area covered by their license. This case hinged on specific factors, such as fixed remuneration, the employer's control over work methods and the workers' inability to reject assignments or negotiate contract terms. The court also noted the subordination of workers to employer-imposed ratings and restrictions on worker-customer communication.[48] Such an approach also remains relevant in Singapore today, albeit for self-employed persons in general.

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[43] Matters, "Current Realities," 9.
[44] Singapore Parliament, "Official Reports Second Reading of the Platform Workers Bill," September 9, 2024, https://sprs.parl.gov.sg/search/#/sprs3topic?reportid=bill-702.
[45] Singapore Parliament, "Second Reading of the Platform Workers Bill."
[46] Attorney-General's Chambers, "Central Provident Fund Act 1953 - Singapore Statutes Online," accessed January 10, 2025, https://sso.agc.gov.sg:5443/Act/CPFA1953?ProvIds=P12-; Attorney-General's Chambers, "Work Injury Compensation Act 2019 - Singapore Statutes Online," accessed January 10, 2025, https://sso.agc.gov.sg:5443/Act/WICA2019.
[47] Attorney-General's Chambers, "Employment Act 1968 - Singapore Statutes Online," accessed January 10, 2025, https://sso.agc.gov.sg:5443/Act/EmA1968.
[48] Daniel Ferguson, "Uber at the Supreme Court: Who is a worker?" UK Parliament-The House of Commons Library, February 22, 2021, https://commonslibrary.parliament.uk/uber-at-the-supreme-court-who-is-a-worker/

Without formal agreements, the court examined the relationship through the conduct of both parties within the relevant legal context, with factors aligned with existing tests applied by Singapore courts in cases involving vicarious liability and non-delegable duties, where the nature of the employment relationship is evaluated to determine employer responsibilities under laws like the Work Injury Compensation Act.[49] However, it is crucial to note that while this judicial approach has provided employment protections to workers circumstantially, the lack of a clear standard and resulting reliance on courts to define employment status has created uncertainty for both workers and companies.

Representation via Unionisation

As an important pillar of worker representation, many countries rely on unions. In Singapore, unions also serve as a primary means of representation for PWs,[50] situated alongside employers and the government in a tripartite framework. This tripartism calls for collaboration between stakeholders to reduce worker vulnerability while promoting harmonious labour-management relations.[51]

Yet, unlike countries such as Iceland where unionised workers account for 91.4% of the workforce, Singapore's unionisation rate is relatively low at 22.2%.[52] This reflects the relatively weak presence of unions in the country, a trend that dates back to the late 1970s when trade union density started to decline. This was influenced by legislations that restricted collective bargaining, creating an environment which disproportionately provided employers with both stability and flexibility.[53] Simultaneously, with employee protections legislated under the Employment Act and the Work Injury Compensation Act, unions remained satisfied with the limited national reach of their voices, influencing policies to a certain degree.[54]

Despite this historical context, unions in Singapore have demonstrated their value during major crises, such as the 2008 Financial Crisis and the COVID-19 pandemic, where they played a pivotal role in minimising layoffs and safeguarding jobs.[55] However, their role in addressing everyday workplace issues has diminished because smaller disputes between employers and employees are resolved through the Industrial Relations Act, which offers a clear framework for dispute resolution.[56] Unions serve a more collaborative and advisory function, working closely with the government and employers to strengthen Singapore's labour sector.[57]

While unions play a recognised role in Singapore's labour ecosystem, their visibility and engagement remain limited. Many workers within unionised industries are unaware of the specific support unions can provide, further restricting their reach.[58] Additionally, existing PWAs representing PWs are not classified as unions, and therefore lack formal authority to negotiate labour conditions with platform operators, thereby limiting the scope of collective representation available to PWs.

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[49] Low Kee Yang, "Vicarious Liability, Non-Delegable Duty and the Ng Huat Seng Decision - The Singapore Law Gazette," The Singapore Law Gazette, December 2017, lawgazette.com.sg/feature/vicarious-liability-non-delegable-duty-ng-huat-seng-decision/.
[50] Ministry of Manpower, "About Trade Unions," accessed January 10, 2025, https://www.mom.gov.sg/employment-practices/trade-unions/about-trade-unions.
[51] Civil Service College, "The Future of Tripartism in Singapore: Concertation or Dissonance?," accessed January 10, 2025, https://knowledge.csc.gov.sg/ethos-issue-11/the-future-of-tripartism-in-singapore-concertation-or-dissonance/.
[52] Statista, "Countries with Highest Share of Unionized Workers Worldwide," accessed January 10, 2025, https://www.statista.com/statistics/1356735/labor-unions-most-unionized-countries-worldwide/.
[53] Sarosh Kuruvilla et al., "Trade Union Growth and Decline in Asia," *British Journal of Industrial Relations* 8, no. 3, (2002): 431-61, https://hdl.handle.net/1813/75130, 15.
[54] Sarosh Kuruvilla et al., "Trade Union Growth and Decline in Asia," *British Journal of Industrial Relations* 8, no. 3, (2002): 431-61, https://hdl.handle.net/1813/75130, 15.
[55] Zalizan Taufiq, "Do Singapore Unions Have a PR Problem?," *CNA*, November 29, 2024, https://www.channelnewsasia.com/today/big-read/do-singapore-unions-pr-problem-4774686.
[56] Ministry of Manpower, "Industrial Relations."
[57] Joanna Seow, "Unions' Shift to Collaborative Approach 50 Years Ago Changed Course of Singapore's History: President Halimah," *The Straits Times*, July 4, 2019, https://www.straitstimes.com/business/unions-shift-to-collaborative-approach-50-years-ago-changed-the-course-of-singapores.
[58] Taufiq, "Do Singapore Unions Have a PR Problem?"

Ultimately, the diverse policy approaches to uphold PWs' welfare reflect the balance between worker protection and flexibility. Countries like Spain and Portugal have prioritised employment protections, at the expense of worker flexibility. Meanwhile, the UK's reliance on judicial decisions has provided protections but created uncertainty for workers and companies alike.

Resolution

In 2021, the Advisory Committee on Platform Workers was established to address critical gaps in the protections afforded to PWs. The committee focused on three key areas of concern: financial protection in the event of injuries, housing and retirement adequacy, and enhancing representation for PWs. It brought together stakeholders from diverse fields, including representatives from the labour movement, platform operators, various industries and the academe. The committee proposed 12 recommendations that aimed to strike a balance between providing basic protections for PWs and preserving the flexibility of platform work. All 12 recommendations were adopted by the government in 2022, culminating in the PW Act.[59]

Resolving Financial Insecurity and Unsustainability

To address the issues of financial insecurity and CPF inadequacy faced by PWs, the committee proposed several key recommendations to ensure that they can better meet their housing and retirement needs while maintaining flexibility in the platform work ecosystem.[60]

Recommendation 7 aligns CPF contribution rates of platform operators with the existing rates applicable to employers and employees.[61] This involves mandatory contributions for PWs aged below 30 in the first year of implementation, with a significant portion directed to their Ordinary Accounts to support housing needs. For workers aged 30 and above, Recommendation 8 offers an opt-in mechanism to participate in the full CPF contribution regime, enabling older cohorts to make decisions based on their financial circumstances.[62]

To facilitate timely contributions, Recommendation 9 mandates platform operators to collect CPF contributions on behalf of PWs.[63] Contributions will progressively increase over five years starting in 2025, to align with the rates applicable to traditional employees by 2029. This phased approach, reflected in Recommendation 10, is intended to minimise financial strain on PWs and platform companies.[64] The government pledged to support them during this transition by reimbursing them for the platform operators' share of CPF contributions under schemes like Maternity and Paternity Leave.[65] The government will also provide offsetting through the Platform Workers CPF Transition Support payment for eligible individuals for the increased CPF contributions to ensure there is no reduction in take-home pay during the initial four years.[66]

The CPF Board also highlighted the tangible benefits of opting into these increased contributions. By 2029, PWs who opt in could receive up to 17% in monthly CPF contributions from platform operators, significantly boosting their CPF savings and strengthening their housing and retirement adequacy. These contributions may be utilised for housing loans, thereby freeing up cash for other immediate needs. For PWs aged 65 and above,

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[59] Ministry of Manpower, "Government Accepts Recommendations."
[60] For an overview, see Appendix 2.
[61] As reflected in the Fourth Schedule of the PW Act; see also Appendix 1.
[62] Ministry of Manpower, "Government Accepts Recommendations."
[63] As reflected in the Fourth Schedule of the PW Act.
[64] As reflected in the Fourth Schedule of the PW Act.
[65] Ministry of Manpower, "Second Reading Speech at Platform Workers Bill Senior Minister of State for Manpower Dr Koh Poh Koon, Parliament House," September 9, 2024, https://www.mom.gov.sg/newsroom/speeches/2024/0909-speech-by-sms-koh-on-platform-workers-bill, at para 33.
[66] Ministry of Manpower, "Government Accepts Recommendations"; Central Provident Fund Board, "CPFB Platform Workers CPF Transition Support," accessed January 10, 2025, https://www.cpf.gov.sg/member/growing-your-savings/government-support/platform-workers-cpf-transition-support.

while their personal share of CPF contributions will decrease, their total CPF contributions would increase due to the larger share covered by platform operators, providing additional financial security in their later years.[67]

Strengthened Workplace Protection Measures

Four recommendations were implemented to address the existing disparities in workplace protection between PWs and employees.[68] Under Recommendation 3, the scope and extent of work injury compensation (ie compensation for income loss as a result of injuries, medical expenses and lump sum compensations for incapacity or death) under the Work Injury Compensation Act is to be extended to PWs. However, one limitation remains: unlike employees, they are still unable to claim compensation for light duties (ie work that involves reduced physical activity).[69] This could be attributed to the inherent challenge of monitoring light-duty work among them, given the decentralised nature of platform work. Furthermore, light-duty arrangements typically require employees to report directly to their employers at work, which is unfeasible for PWs who often work simultaneously for several platform operators.

Supplementing this are two clauses that hold platform operators liable for work injury compensation based on the nature of work and the operators involved. Under Recommendation 5, PWs are to be considered 'at work' during the pick-up stage, from the moment they begin travelling until they leave a pick-up location, including returning to their vehicle if applicable. Similarly, they are considered 'at work' during delivery from the moment they begin travelling to the drop-off location until they leave, including any returns to their vehicle as well. This clarifies the boundaries of operators' liability and ensures that they remain accountable for the injuries sustained by PWs during key stages of platform work.

Recommendation 4 mandates that the platform operator a PW was working for at the time of injury should be held responsible for compensation. Holding platform operators liable reduces ambiguity overcompensation claims and ensures that they receive financial support from clearly identified sources. The Ministry of Manpower has further clarified liability-sharing for PWs working for multiple operators based on the type of tasks performed during injury. For example, if the PW was performing only either delivery or pickup tasks, all responsible platform operators will share liability proportionally, with each operator's share calculated based on their earnings from that particular operator over the previous 90 days. Should tasks involve both pickup and delivery, liability falls on the operator responsible for the delivery task. Additional provisions have been made to address PWs working across different platform sectors (eg delivery and ride-hailing services). Compensation will be calculated based on the previous earnings in the specific sector the PW was working in when injuries were sustained.[70]

Legal Backing and Recognition of PWAs

To enhance representation among PWs,[71] Recommendation 11 called for a new framework enabling them to seek formal representation for negotiations with platform operators. PWAs are now given legal backing to negotiate on employment-related matters with operators. This means that they will be able to represent PWs in negotiations and dispute management with platform operators with an official framework in place.[72]

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[67] Central Provident Fund Board, "CPFB What Are the Benefits If I Opt in to Increased CPF Contributions as a Platform Worker?" January 16, 2025, cpf.gov.sg/service/article/what-are-the-benefits-if-i-opt-in-to-increased-cpf-contributions-as-a-platform-worker.
[68] For an overview, see Appendix 3.
[69] Ministry of Manpower, "Work Injury Compensation for Platform Workers," accessed January 10, 2025, https://www.mom.gov.sg/employment-practices/platform-workers-act/work-injury-compensation-for-platform-workers.
[70] Ministry of Manpower, "Work Injury Compensation."
[71] For an overview, see Appendix 4.
[72] Ian Tan Hanhonn, "Parliament Passes Platform Workers Bill to Strengthen Protections for Platform Workers," DNATA Singapore Staff Union, September 10, 2024, https://www.ntuc.org.sg/dssu/news/Parliament-passes-Platform-Workers-Bill-to-strengthen-protections-for-platform-workers/.

Consequently, the outcomes of these discussions will be made legally binding through collective agreements certified by the Industrial Arbitration Court.[73] This marks a significant shift towards strengthening the collective bargaining power of PWAs. By formalising this negotiation process, PWAs may address key concerns encompassing working conditions and fair compensation in a structured space. More importantly, this new framework elevates the roles of PWAs, transforming them from informal support and advocacy networks into recognised bodies with the authority to represent the collective interests of PWs.

Lastly, in line with Recommendation 12, recommendations for representation were developed collaboratively with industry stakeholders including platform operators (ie Grab, ComfortDelGro Taxi, foodpanda, Lalamove), the three PWAs and the Ministry of Manpower.

Conclusion

The rollout of the PW Act in January 2025 marks a key step in addressing the challenges faced by PWs in Singapore. Yet, the impact of this legislation remains uncertain, given the staggered implementation of the provisions, as well as gaps in institutional and representational support. Despite concerted government efforts to update the regulatory framework, uncertainties persist.

First, while the PW Act's provisions were formulated with the input of the labour movement, gaps remain in understanding the ground-level concerns of PWs, especially during the law's implementation. Younger workers mandated to contribute to CPF may experience immediate financial strain, while older workers who opt into the regime may face challenges in navigating the new framework. These transitional frictions could inadvertently exacerbate short-term financial insecurities, even as the PW Act aims to address them in the long term. Addressing these challenges in real-time will be crucial to ensure that the rollout of the aforementioned provisions aligns with the realities faced by PWs.

Another key concern is the law's potential economic impact on small and medium enterprises (SMEs). Mandatory costs for platform operators, such as PWs' insurance and CPF contributions, are likely to raise service costs,[74] thereby affecting SMEs that often rely on platform services due to limited in-house capabilities. With nearly half of businesses expressing uncertainty about their future and 33% of SMEs reporting declining performance in the past year, these increased costs may strain already tight margins and reduce competitiveness.[75]

To mitigate these challenges, it is crucial for the government to monitor the PW Act's impact on SMEs and collaborate with trade associations to explore support measures (eg subsidies or tax relief). Safeguards should also be implemented to prevent unjustified price hikes by platform operators, protecting both businesses and consumers from undue financial strain. Balancing the PW Act's objectives with SME sustainability will be vital to ensure a fair and resilient business ecosystem.

While the PW Act reflects Singapore's proactive and standardised approach, its success hinges on the effective implementation of its provisions. Interim challenges, such as inconsistencies in representation, tiered implementation timelines and the need to capture ground sentiment highlight the complexities of regulating the rapidly evolving gig economy. The PW Act represents a crucial step toward addressing the vulnerabilities of PWs, but it's true effectiveness will be determined through iterative refinements, stakeholder engagement and long-term impact evaluation.

[73] Ministry of Manpower, "Government Accepts Recommendations," 27.
[74] For an overview of fare increases across various platforms, see Appendix 5.
[75] Singapore Parliament, "Second Reading of the Platform Workers."

Discussion Questions

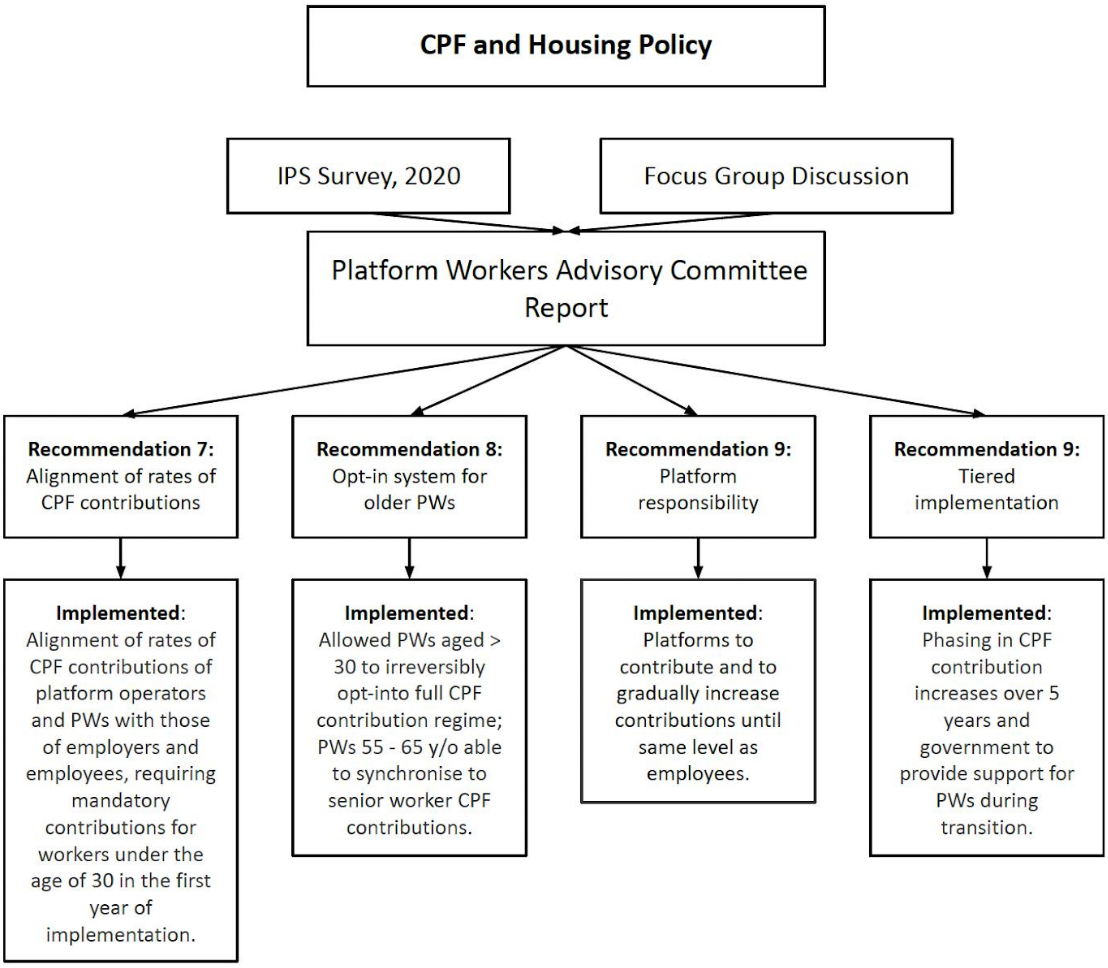
1. How would the changing pricing strategies of platform operators affect PWs in terms of income and job stability?
2. What are the differences in welfare and workplace protections between 'self-employed' individuals and regular employees?
3. Are PWAs effective in addressing the systemic issues faced by PWs? Why or why not?
4. What should be done to improve financial security, workplace protections and representation for PWs?

Appendix 1: CPF Contribution Rates from 1 January 2025 Across Different PW Age Groups[76]

PWs' age in years	**Contribution rates from 1 Jan 2025, given monthly net earnings > $750**		
	By platform operator (% of earnings)	**By platform worker (% of earnings)**	**Total (% of earnings)**
35 and below	3.5	10.5	14
Above 35 to 45		11.5	15
Above 45 to 50		12.5	16
Above 50 to 60		13	16.5
Above 60 to 70		10.5	14
Above 70		9	12.5

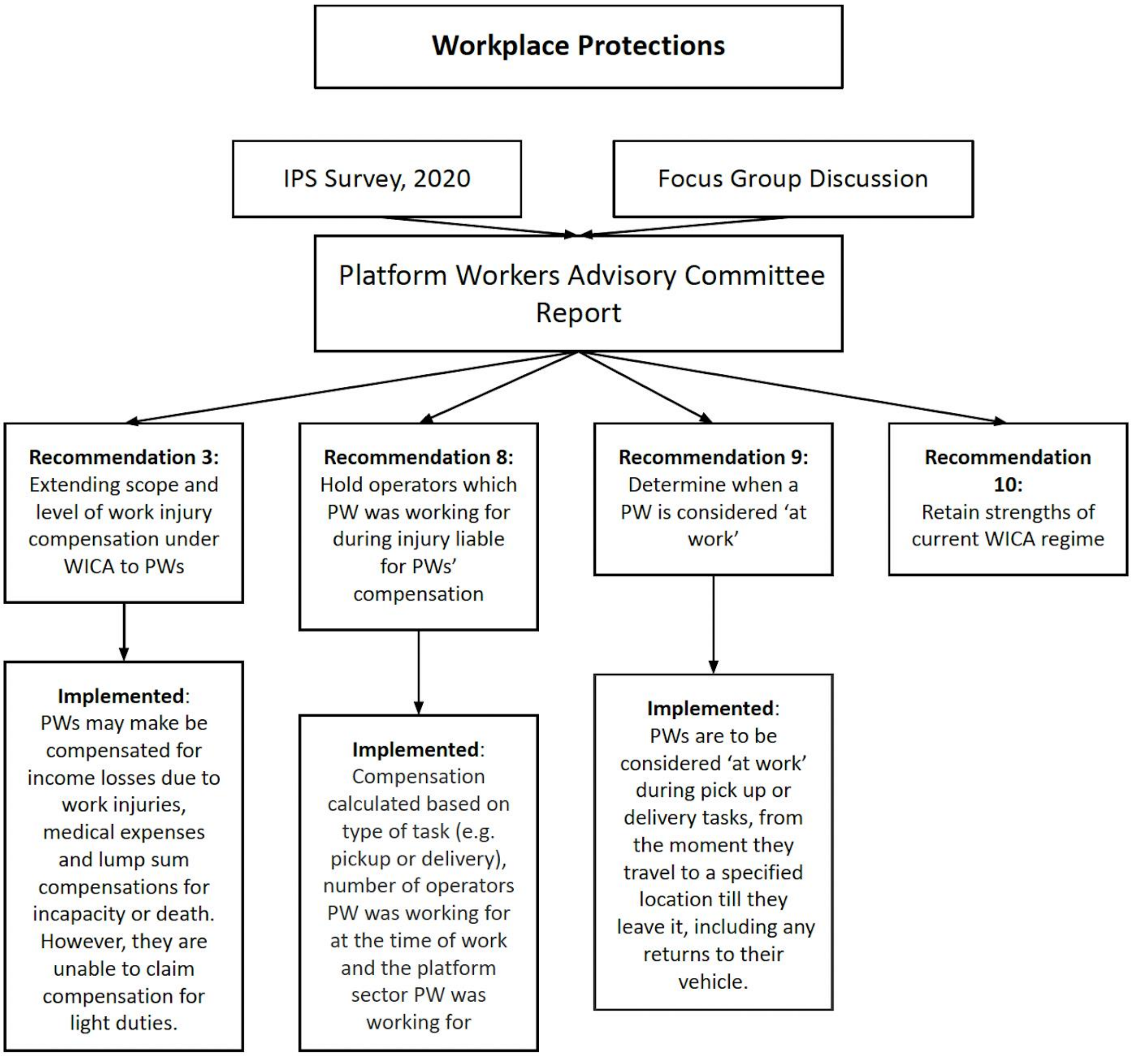
[76] Central Provident Fund Board, "CPFB How Much CPF Contributions to Pay Platform Workers," accessed January 10, 2025, https://www.cpf.gov.sg/employer/platform-operators/obligations/how-much-cpf-contributions-to-pay-platform-workers.

Appendix 2: Flowchart of Problems and Associated Policy Resolution (Resolving Financial Insecurity and Unsustainability)[77]



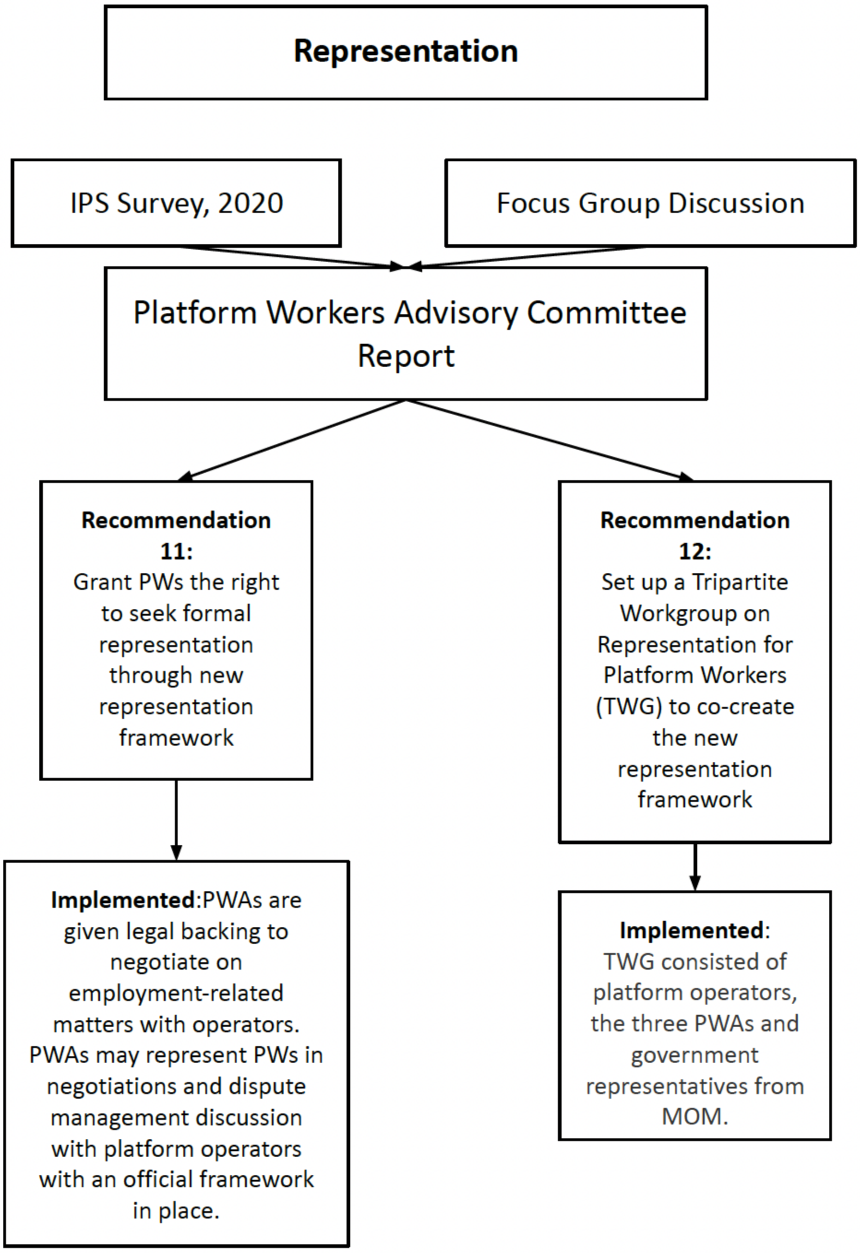
[77] Ministry of Manpower, "Government Accepts Recommendations."

Appendix 3: Flowchart of Problems and Associated Policy Resolution (Strengthened Workplace Protection Measures)[78]



[78] Ministry of Manpower, "Government Accepts Recommendations."

Appendix 4: Flowchart of Problems and Associated Policy Resolution (Legal Backing and Recognition of PWAs)[79]



[79] Ministry of Manpower, "Government Accepts Recommendations."

Appendix 5: Comparison of PW Act Influenced Fare Increases Across Platforms[80]

Platform	Pre 1 January 2025 Platform Fees	Post 1 January 2025 Platform Fees	Platform Fee Increase
Grab	70 cents	90 cents	20 cents (+ 28.6 %)
Zig	70 cents	1 dollar to 1 dollar 20 cents	30 cents to 50 cents (+ 42.9 % to 71.4 %)
Gojek	60 cents to 1 dollar	90 cents to 1 dollar 50 cents	30 cents to 50 cents (+ 50.0 %)
Tada	55 cents to 75 cents	1 dollar 5 cents to 1 dollar 25 cents	50 cents (+ 71.4 % to 91.0 %)

[80] Ester Loi, "Grab, Gojek, Tada and CDG Zig Rides to Cost up to 50 Cents More from 2025," *The Straits Times*, December 24, 2024, https://www.straitstimes.com/singapore/transport/ride-hailing-operators-gojek-and-tada-to-raise-platform-fees-by-up-to-50-cents-per-trip.