



FEEDBACK ON FEDA LICENCE CONDITIONS

Clause	FEDA Licence Conditions	DASL's Comments	MOM's Replies
1.2	The Licensee must comply with all existing laws, regulations, by-laws, codes of practice and any other laws, regulations and by-laws and codes of practice which may come into force and as amended from time to time.	Comment made in March: <ul style="list-style-type: none"> Requested MOM to update DASL if there is any change to any of the Acts so that we can update the industry accordingly. 	The intent of this LC is to remind dorm operators on the need to abide by all other Acts/regulations that may come under other agencies, <u>including but not limited to the examples listed in LC 1.2</u> . If there are modifications to LCs e.g. changes to the list of examples listed in LC 1.2, dorm operators will be notified in accordance with Section 12 of FEDA.
1.4	Where applicable, the Licensee must obtain from the proprietor and furnish to the Commissioner a deed executed by the proprietor granting access to the Government to occupy and manage the dormitory in the event of a dormitory failure.	Comment made in March: <ul style="list-style-type: none"> Please define dorm failure 	The intent is for the Government to step in to operate the dormitory if necessary, in the event the dormitory is unable to continue operating e.g. due to financial insolvency. MOM will study if dormitory failure can be defined more clearly in the LC.
1.6	At the request of the Commissioner, the Licensee must facilitate the exchange of dormitory residents with other Licensees for the purposes of enabling workers to be housed closer to worksites, and factors relating to the health and safety of workers.	Comment made in March: <ul style="list-style-type: none"> To remove this clause 	This LC applies to Class 2, 3, 4. As dorm operators only need to meet this LC upon request by MOM under special circumstances or scenarios, this LC will be retained so that dorm operators are aware that they might be required to meet this LC if requested to do so.
2.3	The Licensee must seek approval from the Commissioner of any change to the following: <ol style="list-style-type: none"> Proprietor of the dormitory Directors or partners of the Licensee Any form of legal restructuring of the Licensee Name of Licensee or dormitory 	Comment made in March: <ul style="list-style-type: none"> Licensee may not have control on the change of proprietor 	MOM will study if there is scope to revise LC 2.3.1 such that dorm operators only need to inform MOM if there are changes to the proprietor.

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5.1	<p>The Licensee must maintain the tidiness, cleanliness, sanitation, and good housekeeping and waste management of the dormitory at all times in accordance with any written law, advisory, guideline or other similar instrument issued by any competent authority. The licensee must also have in place a pest programme within the dormitory at all times.</p>	<p>Comment made in March:</p> <ul style="list-style-type: none"> Requested MOM to include into WP condition to ensure Employers and Workers share the same responsibility. 	<p>It is the responsibility of dorm operators to ensure that the living quarters (room units) in dormitories are kept clean and tidy e.g. by deploying cleaners or ensuring that the tenants keep their own room units clean and tidy via tenancy agreement clauses. MOM has explained this to all FEDA dorm operators in the past, before we introduced FEDA in 2015. We want dormitory operators to work closely with employers and MWs to ensure that the living units are kept clean. MOM is also working with DASL on the design thinking project to see how to shift the mindsets of employers and MWs, to ensure that they play their part to keep the rooms clean.</p>
7.7	<p>Mechanical ventilation (e.g. exhaust fans or fresh air fans) or other air cleaning equipment (e.g. HEPA air filters or equivalent) must be provided when natural ventilation is inadequate for daily living activities or if directed by the Commissioner.</p>	<p>Comment made in March:</p> <ul style="list-style-type: none"> There are current existing dorms which have installed open top sanitary facilities which allows natural ventilation, can request for a waiver and not require exhaust fan? 	<p>For open top sanitary facilities, if natural ventilation is adequate, mechanical ventilation or air cleaning equipment is not required, unless directed by MOM or other agencies.</p>
7.11	<p>The Licensee must not install CCTVs in the toilets, showers or in private rest/sleeping areas.</p>	<p>Comment made in March:</p> <ul style="list-style-type: none"> To define private rest area 	<p>Private rest/sleeping areas include living quarters (room units), sickbays etc that are not in common areas</p>
8.6	<p>Where catered food is delivered to the dormitory (whether arranged for by the Licensee, employers, or residents themselves), the Licensee must take reasonable measures to ensure the food delivered is protected from contamination until it is collected by the residents, such as proper food collection points and food storage.</p>	<p>Comment made in March:</p> <ul style="list-style-type: none"> When the residents ordered their food themselves, the responsibility should not lie under Licensee, should be between the Caterer and residents. Dorm operators only provide the space for their food and not be made responsible for the food contamination etc. 	<p>This LC under the purview of SFA is met if dorm operators have taken reasonable measures to protect the food delivered from contamination. This also helps to ensure dorm cleanliness and prevents pests.</p>

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11.3	The Licensee must ensure that dormitory residents who do not walk or cycle to their workplaces have access to adequate dedicated transport arrangements to and from their workplaces.	<p>Comment made in March:</p> <ul style="list-style-type: none"> Requested MOM to include into WP condition that Employers must provide and be responsible for dedicated transport to and fro workplaces. 	<p>This LC under the purview of LTA applies to Class 3, 4 and only upon request by MOM/LTA for Class 2. As the intent is to ensure that the public transport network at larger dormitories is not overloaded, dorm operators of such larger dormitories should put in place necessary measures to minimise public disamenities involving their dormitories, as we generally do not require employers of migrant workers in smaller dormitories or other types of housing to provide dedicated workplace transport. In this regard, dorm operators can include clauses in their tenancy agreements to require employers to provide dedicated workplace transport for their workers.</p>
15.12	There must be shelter decks constructed at a minimum of two (02) access points into the residential blocks, if these access points have windows or corridor opening above them. The shelter decks are to be constructed at the first level, with minimum extension of three (03) metres outwards.	<p>Comment made in March:</p> <ul style="list-style-type: none"> Provide more clarity on shelter decks 	<p>This LC under the purview of the Police applies to Class 4 to ensure that access points are sheltered for tactical actions in public order incidents. This is an existing LC for dorms with 1,000 or more beds. Below are sample photos for illustration:</p> <div style="display: flex; justify-content: space-around;">   </div>
15.14	Common corridors must have a minimum width clearance of 1.5 metres. The Licensee must ensure that no items are placed along the corridors that will reduce the 1.5m clearance width.	<p>Comment made in March:</p> <ul style="list-style-type: none"> Suggested to remove as the same is included in SCDF agreement and existing dorms are built in accordance to approved plans 	<p>This LC under the purview of the Police applies to Class 2, 3, 4 to ensure that corridors are sufficiently wide for tactical actions in public order incidents. Existing dormitories that are unable to meet this LC can seek waiver if there are valid reasons.</p>

OPERATIONAL CHALLENGES

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1.7: must appoint at least one suitable representative or liaison officer from the dormitory management	What about for those FCDs who are managed by HR? Does it impact?	This LC applies to Class 1, 2,3 ,4. Yes, such FCDs are also required to appoint a suitable representative. As long as the appointed representative is aware of the requirements under FEDA and is involved in the operations of the dormitory, this person can be a HR representative.
2: document retention and reporting 3: incidents and dispute reporting	What is required? Any templates for such reporting? Must security be outsourced to a licensed security agency? Or can it be appointed internally? If yes, must the appointed person be licensed under SPF?	Applies to Class 1,2,3,4. Yes, there are existing reporting templates and channels of submission for dorms with 1,000 or more beds. These may be revised after FEDA expansion. Details will be shared with dorm operators when FEDA expansion comes into effect. We do not prescribe that security personnel must be licensed but advise that security industry requirements and guidelines should be met.
5.2: Pests Control	Vector control plan, does it need to be licensed or can be in-house?	This LC under the purview of NEA applies to Class 1,2,3,4. We do not prescribe that a licensed vector control operator must be engaged but advise that NEA guidelines should be met.
8: Catered food/cooking facilities	If workers cater their own food, will the DOs be held liability if in any case of food poisoning? For 8.6, challenging for DOs to ensure food is collected and consumed within stipulated time.	This LC under the purview of SFA is met if the dorm operator had taken reasonable measures to protect food delivered from contamination until they are collected. If reasonable measures had been taken, dorm operators will not be held liable.

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<p>12: Recreational amenities (12.5, 12.6)</p> <p>12.10: Provision of wifi</p>	<p>Not all FCDs have sufficient space to provide the amenities. FCDs are usually located at industrial area and not quite possible to provide sports/gym equipment</p> <p>Can waiver be considered given that pre-paid data cards are readily available at affordable price? Relatively high costs for DOs to lay infrastructural throughout the dorm. Commercial wifi plan can be costly.</p>	<p>Dormitories that are unable to provide the recreational facilities can seek waiver for MOM's assessment.</p> <p>It is currently a requirement for Wifi to be provided in FEDA + non-FEDA dormitories in common areas. Wifi in living quarters (room units) will only be required for new dorms that applied for approval to develop on or after 18 Sep 2021. If Wifi cannot be provided, dorm operators can propose viable alternatives (e.g. mobile data cards) for MOM's assessment.</p>
<p>14: Fire safety</p>	<p>Can fire drills be conducted by in-house safety department. Need FSM?</p>	<p>Fire drills can be conducted without a Fire Safety Manager (FSM).</p> <p>An FSM is only needed under the Fire Safety Act for dorms with 1,000 or more beds or floor area of 5,000 sqm or more.</p>
<p>15.14. Common corridors must have a minimum width clearance of 1.5 metres. The Licensee must ensure that no items are placed along the corridors that will reduce the 1.5m clearance width.</p>	<p>Subjective to building infrastructure. Need clarification from SCDF.</p>	<p>Covered earlier on slide 4.</p>