



**Feedback to
PDPC Industry Engagement
on NRIC Guidelines**

National Trades Union Congress (NTUC)



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ORGANISATIONS AND KEY CONTACT PERSON

NTUC, 59 affiliated unions/associations and Ong Teng Cheong Institute of Leadership (OTCi)

- Kwong Yuk Wah *Chief Data Protection Officer and Chief Information Officer*
- Shona Tan *Director, CCD/ Service Excellence*
Chief Brand & Communications, NTUC Enterprise
- Jennifer Tan *Deputy Director, LSD*
- Edmund Chee *Assistant Director, Service Excellence*
- Ho Kok Cheng *Deputy Director, Service Excellence*

SUMMARY OF MAJOR POINTS

National Trades Union Congress (NTUC) and NTUC Social Enterprises (SE)

- The National Trades Union Congress (NTUC), an NGO, is a national confederation of trade unions as well as a network of professional associations and partners across all sectors, and we serve more than 900K members in Singapore and a network of 1.2 million working people in Singapore. We also operate and own many social enterprises in Singapore, where we aim to create a greater social force to do good by harnessing the capabilities of the social enterprises to meet pressing social needs in areas like health and eldercare, childcare, daily essentials, cooked food and financial services, serving over two million customers. We are the Unusual Labour Movement.
- In serving our members, the NRIC/FIN is a unique identifier and a common denominator in NTUC and amongst the NTUC Social Enterprises and related organisations. This covers virtually in all aspects of membership recruitment, outreach & engagement, activities and events, customer touchpoints and member servicing. Please refer to the summary chart on the list of NTUC Social Enterprises and their feedback below (Annex B – Annex J)
- As an NGO with a strong social mission to serve all working people regardless of age, race and nationalities in Singapore, NTUC works very closely with government ministries, agencies and partners on national policies and initiatives concerning workers. This includes the Ministry of Manpower (MOM), Workforce Singapore (WSG), Singapore National Employers Federation (SNEF) and Employment and Employability Institute (e2i) among many others. When rolling out these national initiatives and programmes for workers and members, the collection of NRIC/FIN is a mandatory information as stipulated by the various regulations governed by the respective Ministries and agencies. Please refer to the list of programmes with a “Yes” to ‘Required by Law’ on the collection of NRIC/FIN in the summary chart below.
- Departments and Business Units (BUs) in NTUC are also tasked to providing a wide range of outreach and assistance programmes, workplace advisory, advocacy and research and servicing under the **CARE, FAIR** and **GROW** model for our members and union leaders. The collection of NRIC/FIN is necessary to accurately establish and verify the identity of the individual to a high degree of fidelity. This is crucial because NTUC programmes and services are tiered and differentiated based on the membership type an individual has with NTUC. For example, NTUC union member and U Network member enjoy different rates when signing up for NTUC events/services. Please refer to the summary chart for the list of NTUC departments and BUs under **CARE, FAIR** and **GROW** that are providing the list of programme and services which involves NRIC/FIN.
- Notably, NTUC members receive training subsidiary known as Union Training Assistance Programme (UTAP) for skill upgrading and trainings. The collection of NRIC/FIN is an integral part of registration and funding claims processing with WSG and e2i.

The enhancements cost to replace NRIC/FIN as a unique identifier in NTUC and the social enterprises are estimated as follows:

[Redacted]

Note: This is the estimated cost at NTUC and does not include cost from other entities in the Labour Movement where there might be a need to synchronise/align systems.

Summary Chart – NTUC

[Redacted]

COMMENTS TO QUESTIONS OUTLINED IN THE PUBLIC CONSULTATION DOCUMENT

The use of NRIC /FIN number has been used as a common denominator across the entire NTUC family comprising the Congress, affiliated unions, related organisations and the Social Enterprises, in all aspects of membership recruitment, outreach, financial and assistance programmes, workplace representation and advisory. Hence, the level of impact to replace with Unique Identification Number (UIN) is immense.

In particular, the collection, use and disclosure of NRIC/FIN number in national programmes and initiatives are mandated by regulations govern by ministries and agencies which NTUC and the entities work closely with. This pose great operational challenge when implementing the programmes with respective ministries and government agencies.

Please refer to Annex C – NTUC FairPrice for additional comments to questions outlines in the public consultation document.

CONCLUSION

Time Required and Costs to Labour Movement

- It will take an estimated 5-10 years for the Labour Movement to complete the PDPC's regulations to replace NRIC/FIN with another unique identifier.
- The estimated cost to Labour Movement to enhance work processes, IT systems and training is estimated to be of tens of million in SGD.

ANNEX A - NTUC ARU

[Redacted]

ANNEX B - NTUC FAIRPRICE

[Redacted]