



CENTRO DE INVESTIGACIONES
DE TRABAJO SOCIAL

ISSN 2244-808X
DL pp 201002Z43506

PERSPECTIVA INTERACCIÓN Y

Revista de Trabajo Social

Vol. 16 No. 1
Enero – Abril
2026

Universidad del Zulia

Facultad de Ciencias Jurídicas y Políticas
Centro de Investigaciones en Trabajo Social

INTERACCIÓN Y PERSPECTIVA

ARTÍCULO DE INVESTIGACIÓN

Revista de Trabajo Social

ISSN 2244-808X ~ Dep. Legal pp 201002Z43506

DOI: <https://doi.org/10.5281/zenodo.17641800>

Vol. 16 (1): 164 - 179 pp, 2026

Análisis de las leyes de vivienda social en Vietnam y otros países y recomendaciones para Vietnam

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Resumen. El desarrollo de la vivienda social constituye tanto un remedio económico como una importante obligación política y social del país. Mediante una colaboración meticulosa entre los organismos gubernamentales y los inversores, Vietnam puede asimilar las experiencias de otras naciones y adaptarlas para alinearlas con su contexto interno. Esto se considera una estrategia a largo plazo que fomenta la equidad social. Facilitar la vivienda social para personas de bajos ingresos mejorará la productividad laboral, creando condiciones para un crecimiento económico sostenible. Este artículo compara y analiza principalmente la legislación sobre regímenes preferenciales, sujetos y condiciones para acceder a incentivos de vivienda social en Vietnam y en varios otros países del mundo. Posteriormente, propone métodos para que Vietnam mejore sus políticas de vivienda social.

Palabras clave: vivienda social, bajos ingresos, Vietnam, Estados Unidos de América, Corea del Sur, China, Francia.

Analysis of social housing laws in Vietnam and other countries and recommendations for Vietnam

Abstract. The development of social housing constitutes both an economic remedy and a significant political and social obligation of the nation. Through meticulous collaboration between governmental bodies and investors, Vietnam can assimilate the experiences of other nations and adapt them to align with its domestic context. This is regarded as a long-term strategy that fosters social equity. Facilitating social housing for low-income individuals will enhance labor productivity, fostering conditions for sustainable economic growth. This article primarily compares and analyzes the legislation regarding preferential regimes, subjects, and conditions for accessing social housing incentives in Vietnam and several other countries globally. It subsequently proposes methods for Vietnam to enhance its social housing policies.

Keywords: social housing, low-income, Vietnam, Unites States of America, South Korean, China, France.

INTRODUCTION

Every human being is born with some basic natural rights like the right to life, the right to education, the right to food etc. and the right to shelter (housing) is one of them. The right to housing is a basic human right and it has been recognized as a fundamental right by various international conventions and declarations. Article 25 of the Universal Declaration of Human Rights recognizes the right to housing as part of the right to an adequate standard of living. It states that “Everyone has the right to a standard of living adequate for the health and wellbeing of himself and his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age, and other lack of livelihood in circumstances beyond his control. Similarly, Article 11(1) of the International Covenant on Economic, Social and Cultural Rights (ICESCR) also guarantees the right to housing as part of the right to an adequate standard of living. So, the failure to provide adequate housing results in the violation of human dignity as housing forms an indispensable part of ensuring human dignity (United Nations, Universal Declaration of Human Rights). The right to adequate housing is relevant to all states, as they have all ratified at least one international treaty referring to adequate housing and committed themselves to protecting this right. By becoming a member of any of the international conventions or covenants these states have an obligation upon them to protect the right of housing of their subjects and to launch various policies and programmes for the upliftment of the weaker sections.

Housing is one of the basic human needs. The World Health Organization (WHO) defines it as a “residential environment which includes, in addition to the physical structure that man uses for shelter, all necessary services, facilities, equipment, devices needed or desired for the physical and mental health and social well-being of the family” (Bernstein et al., 2006). So in simple parlance, a house is a place which should be physically adequate and fit for human habitation and where at least basic human necessities like water, electricity etc., would be easily available. It is equally important that such housing should be affordable by low-income households or that section of society whose income is below the median household income. Having access to quality affordable housing

is fundamental to reducing poverty, improving equal opportunities and guaranteeing sustainable growth. Moreover, it has multiple linkages to other aspects of individual well-being.

Housing should not be viewed in the narrow context merely of a few walls and a roof made of bricks. Housing has much wider connotations, impacting human life and dignity. Accordingly, housing needs to be viewed in the larger context consisting of all basic undisturbed rights to shelter, amenities and infrastructures associated with human living, which not only provides an assured quality of life but also empowers and enables people living in the house to be happy, healthy and more productive. These essentials would include providing; secure tenure, assured water supply, sewerage, sanitation, healthcare and educational facilities, adequacy of living space, taking care of vulnerable sections of the social pyramid, availability of materials for construction etc.

Considering the above essentials of housing, here the concept of social housing arises which, to a great extent, fulfils the criteria that are needed for achieving the right of housing. As social housing provides long-term homes that enable people to settle.

Moreover, social housing is affordable and functions under the target set by the government. The standard says that all homes should be in a good state of repair, safe, secure and warm. Hence to fulfill the target of housing and to achieve the goal set by the constitution social housing is much convenient for achieving the same.

The government at every stage is and has been making certain policies and providing incentives in the form of subsidized loans. to the sections hereinbefore mentioned so that they can afford to have access to some basic human necessities. Therefore, here the concept of 'social housing' arises. Social housing means any rental housing that may be owned or managed by the state, by non-profit organizations, or by both of them, usually to provide affordable housing. Hence it can be said that it is one of the measures whereby the government try to severe the problem of housing inequality (Caves, 2004).

However, there are some misconceptions in the minds of the common people about the right to housing. They think that this right puts an obligation upon the state to build houses for the entire population but in contrast, the state has to focus on the most vulnerable and marginalized groups like low-income households etc. Another misconception about the right to housing is that it prohibits those development projects of the government which could displace people, instead of that the state while enacting those projects has to impose certain conditions and procedural limits on them.

RESEARCH METHODS

The subsequent research methodologies are implemented in this article: (i) Legal analysis method: an analysis that aims to clarify the wording, content, and scope of application of legal provisions; (ii) comparative legal method: an analysis that identifies similarities and differences in the legal provisions of the countries selected for research; and (iii) historical research method: an analysis that examines the historical context of the birth and development of a specific legal provision or institution in order to elucidate the necessity, objects, and scope of regulation of that provision/institution in each period within a specific historical-economic-social context. Furthermore, secondary data is employed in the study to establish a foundation for the analysis and evaluation of the subject matter and to formulate objective and suitable recommendations.

RESULTS AND DISCUSSIONS

Legal regulations regarding social housing in Vietnam

The term “housing” is defined in Clause 1, Article 2 of the 2023 Vietnamese Housing Law, effective August 1, 2024, as a construction work intended for residence and fulfilling the living needs of families and individuals. Housing designated for both residential and permissible non-residential purposes is classified as mixed-use housing. The term “social housing” is defined in Clause 7, Article 2 of the 2023 Vietnamese Housing Law as housing that receives state assistance for individuals eligible for housing support policies in accordance with the provisions of the Housing Law 2023. The author identifies three characteristics of social housing derived from the concepts of “housing” and “social housing” (Vang-phu and Nhu, 2024):

Primarily, social housing must constitute actual housing. Consequently, social housing constitutes a construction project, a product fabricated according to specifications, produced through human labor, construction materials, and installed equipment, associated with the land, which may encompass subterranean components, terrestrial elements, aquatic sections, and aerial structures (Clause 10, Article 3 of the 2014 Construction Law, amended and supplemented by Point c, Clause 1, Article 1 of the 2020 amended Construction Law).

The state endorses social housing initiatives. State policy significantly influences the expansion of social housing. It influences all aspects, from the distribution of land and loan capital to streamlining processes for the advantage of investors, buyers, renters, and hire-purchasers. The restriction on the categories eligible for social housing support policies. Only 12 categories of individuals specified in Article 76 of the 2023 Vietnamese Housing Law are permitted to purchase, lease, or lease-purchase social housing, with each category receiving distinct support policies in various forms.

Recipients of preferential policies regarding social housing

According to Article 76 of the 2023 Vietnamese Housing Law, there are 12 groups of subjects eligible for social housing support policies, including: (1) People with meritorious services to the revolution, relatives of martyrs who are eligible for housing improvement support according to the provisions of the Ordinance on Preferential Treatment for People with Meritorious Services to the Revolution; (2) Poor and near-poor households in rural areas; (3) Poor and near-poor households in rural areas in areas frequently affected by natural disasters and climate change; (4) Poor and near-poor households in urban areas; (5) Low-income people in urban areas; (6) Workers and laborers working at enterprises, cooperatives, and cooperative unions inside and outside industrial zones; (7) Officers, professional soldiers, non-commissioned officers of the people’s armed forces, police workers, civil servants, defense workers and public employees currently serving in the army; people working in secretarial work, people working in other secretarial organizations receiving salaries from the state budget currently working; (8) Cadres, civil servants, and public employees as prescribed by law on cadres, civil servants, and public employees; (9) Subjects who have returned official housing as prescribed in Clause 4, Article 125 of the 2023 Housing Law, except for cases of official housing revocation due to violations of the provisions of the 2023 Housing Law; (10) Households and individuals whose land is revocation and whose houses must be cleared or demolished as prescribed by law but have not yet received compensation from the State in the form of housing or residential land; (11) Students of universities, academies, colleges, vocational schools,

and specialized schools as prescribed by law; students of public boarding schools for ethnic minorities; (12) Enterprises, cooperatives, and cooperative unions in industrial parks.

Criteria for benefiting from social housing support policies

Per the stipulations of Clause 1, Article 78 of the 2023 Vietnamese Housing Law, the acquisition or lease-purchase of social housing necessitates the fulfillment of two conditions pertaining to housing and income.

Initially, residential circumstances

Eligible subjects (1), (4), (5), (6), (7), (8), (9), and (10) for the purchase or hire-purchase of social housing must not possess a residence in the province or centrally administered city where the social housing construction investment project is situated, must not have previously acquired or engaged in a hire-purchase of social housing, must not have benefited from any housing support policies in the respective province or centrally administered city, or must own a residence in the same area where the social housing project is located, provided that the average housing area per capita is less than 15 m² of floor space per person. Additionally, subjects specified in points b, c, d, đ, e, and g of Clause 1, Article 45 of the 2023 Vietnamese Housing Law must not reside in official housing. The particulars are as follows:

The absence of personal housing is established when individuals (1), (4), (5), (6), (7), (8), (9), (10), and their spouse (if applicable) are excluded from the Certificate of Land Use Rights, as well as from ownership of assets linked to land in the province or centrally governed city where the social housing initiative is situated at the time of application for the purchase or lease-purchase of social housing (Clause 1, Article 29 of Decree No. 100/2024/ND-CP dated July 26, 2024, issued by the Government, which elaborates on various provisions of the Housing Law regarding the development and management of social housing (Decree 100/2024)). If subjects (1), (4), (5), (6), (7), (8), (9), and (10) possess a residence, yet the average housing area per capita is below 15 m² of floor area per person. Clause 2, Article 29, Decree 100/2024 stipulates that the average housing area per individual is determined by the applicant, their spouse, and any registered permanent residents, including parents and children.

Secondly, income criteria

Initially, for subjects (5), (6), and (8) referenced above, the subsequent income criteria must be satisfied: If the applicant is unmarried, the actual monthly income received must not surpass 15 million VND, as per the Wage and Salary Table validated by the agency, unit, or enterprise of the applicant's employment. If the applicant is legally married, the combined actual monthly income of the applicant and their spouse must not exceed 30 million VND, as per the Wage and Salary Table verified by the relevant agency, unit, or enterprise of the applicant's employment (Point a, Clause 1, Article 30 of Decree 100/2024).

The aforementioned individual's actual monthly income must not exceed 15 million VND if they are single and lack a work contract. Per the law (Clause 2, Article 30, Decree No. 100/2024), the applicant and their spouse must not jointly earn more than 30 million VND per month if married.

Third, the government's poverty criteria (Clause 3, Article 30, Decree No. 100/2024) stipulate that subjects (2), (3), and (4) must originate from impoverished or near-impoverished households.

Fourthly, regarding the aforementioned subject (7), the regulations stipulate that if the applicant is single, their actual monthly income must not surpass the total income of an officer holding the rank of Colonel, which includes both basic salary and allowances as per regulations, as verified by the relevant agency or unit (Clause 1, Article 67 of Decree No. 100/2024);

If the applicant is legally married:

The applicant and their spouse are both subject to (7) and possess a combined monthly income that does not surpass 2.0 times the total income of an officer holding the rank of Colonel (inclusive of basic salary and allowances as per regulations) verified by the agency or unit of their employment and management (Point a, Clause 2, Article 67, Decree No. 100/2024);

The applicant's spouse, who is exempt from (7), must possess a cumulative monthly income that does not surpass 1.5 times the total remuneration of an officer holding the rank of Colonel (inclusive of base salary and allowances as per regulations) verified by the respective agency, unit, or enterprise of employment (Point b, Clause 2, Article 67, Decree No. 100/2024).

If the applicant's spouse lacks a labor contract, the commune-level People's Committee shall verify the income requirement. According to Clause 2, Article 78 of the 2023 Vietnamese Housing Law, individuals in categories (1), (4), (5), (6), (7), (8), (9), (10), and (11) are exempt from housing and income criteria when renting social housing.

Public housing in South Korea

The term "social housing" was first utilized in Korea in 2010 (Choi-k, 2020). The term "social housing" is relatively novel and unfamiliar to the Korean populace, whereas "public housing" is more prevalent and recognized by the majority. The 1980s in Korea marked the establishment of the inaugural public housing, which remains functional as social housing to this day. (Ha-s, 2008). Public housing and social housing are distinct terms utilized at various times in Korea. Both terms denote the same concept: assisting individuals in need, particularly those with low incomes, in securing housing amidst scarcity (Choi-e et al., 2016).

The Korean government categorizes individuals into ten income groups, with the lowest representing low-income individuals and the highest denoting the affluent, where five of these groups are deemed potential beneficiaries of government rental housing. Assistance is categorized into three primary groups: individuals responsible for ensuring housing availability, those facilitating home purchases, and those tasked with maintaining stable housing prices. Among the groups with varying objectives, distinct characteristics and support mechanisms exist. Group characteristics: Groups unable to pay rent (Group 1, Group 2); groups unable to purchase their own homes (Group 3, Group 4); groups capable of buying their own homes with government assistance (Group 5, Group 6); groups able to purchase their own homes without assistance (Group 7, Group 8, Group 9, Group 10). The government will construct rental housing areas and offer financial assistance for the impoverished who are unable to afford rent; the rental rates will be approximately 30% lower than the market price. The government will assist the low-income demographic by reducing the rental fee by one tier. Groups 3 and 4 will receive support with a rental price 15-16% below the market rate. The Korean government will provide support for the middle-income group, rather than the low-income group, by implementing a lower interest rate to facilitate home purchases. The Korean Government will extend diverse forms of assistance to these groups (Hoang, 2023).

The first category involves residential properties available for purchase. Private developers sell medium- to large-sized homes, with regulations adjusted periodically by the state; multi-unit and detached houses (1 million units) are available for groups 4, 5, and 6; small and medium-sized homes (400,000 units) are also sold by private developers on residential land, funded for groups 5 and 6; additionally, state-subsidized housing (700,000 units) is offered to the public for groups 3, 4, and 5. In Korea, the cost of social housing for sale is approximately 80% of the market price. Second category, rental housing: Public rental (300,000 units) (share type, jeonse type) for groups 3, 4, 5; private rental (100,000 units) for group 6; Kukmin rental housing (400,000 units) for groups 2, 3, 4; Yeonggu rental housing (100,000 units) for group 1. Social rental housing is priced at 50% to 80% of the market rate, contingent upon the housing type.

In Korea, businesses prioritize the construction of social housing over profit margins, viewing it as a responsibility once the economy experiences robust growth; consequently, the incentives they receive are minimal. Consequently, it is challenging to provide an accurate estimate of the profits generated by businesses investing in social housing. The Korean government will provide capital and financial incentives to companies investing in social housing. In particular, socio-economic agents supply housing for individuals in need within the realm of social housing. Socio-economic agents may obtain financial assistance, including low interest rates, from the public sector via public-private partnerships, wherein the public sector offers financial incentives to suppliers for the provision of social housing (Sang-Hyun et al., 2020). The Korean government must intervene in the market regarding this type of social housing; otherwise, the impoverished will be unable to obtain access to it. Consequently, the government and businesses will jointly contribute to the advancement of social housing in Korea.

Public housing in China

Since 2001, China's experience in social housing development has led to the establishment of low-cost rental housing regulations, which were expanded nationwide in 2004, resulting in a transparent housing policy that allocates subsidies to low-income families under state oversight. Subsequently, China transformed social housing development by commercializing construction, distribution, and utilization. The government offers loans to participating enterprises and grants them exemptions from specific taxes. Low-income housing comprises two categories: for sale and for rent (Le, 2023).

Individuals qualified to purchase or lease a residence must satisfy three criteria: possess a low income relative to the local average, maintain an average housing area of less than 7 square meters per capita, and hold a bank account balance of 90,000 yuan or less (approximately 300 million VND). This condition will be modified annually to align with the local economic development circumstances. The State Council of China approved the "Guiding Opinions on Social Housing Construction Planning" (Document No. 14) on August 25, 2023. The primary objectives were to "Enhance the construction and provision of social housing" and "Facilitate the development of a new model for the transformation of the real estate industry." Document No. 14 explicitly identifies the beneficiaries of social housing as the low-income "working class," along with other demographics such as urban households, employees of governmental agencies and organizations, and skilled individuals recruited by enterprises. The increasing urban population, in conjunction with low- and middle-income individuals, will pose a significant challenge for social housing in the future (Doan, 2024).

Public housing in Singapore

The Singapore government possesses a remarkable viewpoint on social housing development policy. Providing housing at accessible prices to all citizens, irrespective of their financial status, encourages individual motivation to work and fosters savings initiatives. Consequently, individuals who exert greater effort will accumulate sufficient funds to acquire their residence more promptly.

Singapore's housing support policy addresses both supply and demand aspects, specifically through supply-side subsidies that assist businesses via government tax exemptions and reductions, credit support (including long-term loans with low interest rates and grace periods), certain guarantee mechanisms, as well as land and infrastructure provisions. Government subsidies will be provided for privately designed, constructed, and priced apartments, resulting in costs below market value. Singapore possesses efficient, transparent, and expedited administrative procedures that assist private entities engaged in the construction of social housing. Demand-side subsidies are executed by assisting households through various mechanisms, including tax incentives (permitting deductions for low-income housing expenses), subsidies for purchasing or renting residences, savings assistance for home acquisition, and offering preferential loans for property purchases.

In 1960, Singapore implemented a state-owned enterprise model for the development of social housing. The Housing Development Board (HDB) of the Singaporean government is solely responsible for researching, planning, acquiring land, constructing, developing, distributing, maintaining, and managing social housing. This is a cohesive, specialized, professional entity with explicit and well-defined powers and responsibilities. Consequently, social housing in Singapore is referred to as HDB housing (Le, 2022). The HDB housing initiative primarily targets low- and middle-income families in Singapore. Individuals who fulfill specific criteria, including a designated income level, Singaporean citizenship, and marital status (Nguyen, 2024), may apply to purchase HDB homes via the housing application process. The criteria are delineated as follows (SG property launches, 2025):

The primary eligibility criterion for acquiring a HDB flat pertains to citizenship. Singaporean citizens and permanent residents (PRs) are permitted to acquire a HDB flat, although the regulations vary slightly for each category. Age constitutes a significant criterion in assessing eligibility for a HDB flat. Applicants must be a minimum of 21 years of age to acquire a HDB flat under the majority of schemes. Under the Single Singaporean Citizenship Scheme, individuals may acquire a flat starting at the age of 35. This age criterion embodies the government's objective of facilitating family establishment and ensuring housing stability for young citizens.

Secondly, the Family Core requirement: The notion of family core is fundamental to HDB eligibility criteria. To qualify for the purchase of a HDB flat, an applicant must form a family nucleus, which generally comprises a spouse and their offspring, parents and siblings, or dependents under their guardianship.

Thirdly, income ceilings are crucial in assessing eligibility for HDB flats, particularly new units directly from HDB. These ceilings guarantee that public housing remains accessible to low- and middle-income families. As of 2023, the income threshold for a standard BTO flat is \$14,000 for families. Households with incomes exceeding this threshold are ineligible to acquire new BTO flats, thereby guaranteeing that individuals with greater need can obtain affordable housing.

Furthermore, applicants must restrict their property ownership to prioritize HDB flats for individuals in genuine need.

Public housing in France

In France, social housing, referred to as *Habitation à Loyer Modéré* (HLM), offers economical rental alternatives for individuals and families with constrained financial means. It is intended to guarantee access to stable housing and is administered by governmental bodies and local authorities. To be eligible for social housing, applicants must satisfy particular criteria, including: Income limit: Households must not surpass a specified income threshold, which differs by region and family size; Residence status: Applicants must be legal residents or possess a valid residence permit. Housing necessity: Preference is accorded to individuals in vulnerable circumstances, including those residing in overcrowded environments, experiencing domestic violence, or facing financial difficulties.

Social housing in France refers to residences constructed with state financial assistance via social organizations or enterprises, aimed at fulfilling the objectives of the Law on the Right to Housing (DALO) to maintain equilibrium among societal components regarding housing requirements. By offering subsidized rental rates for individuals with low income (below the established threshold). Social housing rental prices are determined by allocation standards and conditions, with the rent per m² assessed by the organization according to established criteria. Consequently, based on individual income levels and particular circumstances, French citizens receive incentives for utilizing social housing tailored to their specific needs. The International Observatory on Social Housing (2017) delineates priority demographics for social housing. The priority groups encompass individuals experiencing homelessness, those at risk of eviction, residents of inadequate housing, overcrowded households, and individuals with disabilities.

The government allocates budgetary funds in three ways: direct support for social housing construction projects; exemption of land tax for owners of social housing construction projects; and compensation of the exempted tax to local governments. The Provincial Governor is entitled to retain 30% of the project's apartments, with 5% allocated for government officials, in exchange for a preferential value-added tax rate of 5.5% (Nguyen, 2024).

Public housing in the United States of America

Housing policy, particularly social housing for low-income individuals, is pivotal to the advancement of American society. Consequently, the US government has prioritized and facilitated the development of social housing (Khanh, 2020). The U.S. government periodically reviews low-income housing assistance policies to adapt to evolving economic, market, environmental, and social conditions. In the United States, public housing is characterized as affordable and secure rental accommodation for low-income families, the elderly, and individuals with disabilities. In the United States, Local Public Housing Agencies (PHAs) establish eligibility for public housing based on the following criteria (USA.GOV, 2025). The individual must have either US citizenship or a valid immigration status.

Public housing in the United States is government-regulated accommodation offered by proprietors at rent-controlled rates on a non-profit basis, allocated administratively according to the needs of low-income households and individuals, with priority given on a first-come, first-served basis. Additionally, the federal government allocates subsidies to private entities, encompassing both for-profit and non-profit organizations, that manage supportive housing for the elderly and disabled (Ball et al., 1988).

The Low-Income Housing Tax Credit (LIHTC) program is a federal initiative created by the Tax Reform Act of 1986 to promote the development and preservation of affordable housing in the United States (Everett, 2020). The LIHTC offers tax incentives to private developers to promote the construction or renovation of housing. Tax credits are distributed to states according to population and subsequently subsidized by the state to enterprises undertaking new housing developments for low-income tenants. These housing projects encompass all or a portion of the apartments designated for low-income tenants for a duration of 15 years from the date of completion. The developer's credit is determined by the proportion of low-income apartments owned by the project. In the United States, developers play a significant role in social housing development programs. The LIHTC program (Xa and et al., 2023) provides investors with credits or incentives to construct affordable housing projects.

A comparative analysis of the legal frameworks governing social housing in Vietnam and several other countries globally.

A survey of documents from organizations and research projects on global social housing reveals two predominant perspectives: one advocating for social housing as a provision for select individuals, and the other supporting universal access for all in need (Pham, 2016). The former, more widely accepted viewpoint regards social housing as a solution for those lacking income or unable to secure their own accommodation. This perspective is endorsed by numerous nations, including France, South Korea, the United States, and China, thus the provision of social housing is regarded as an embodiment of governmental policy aimed at enhancing the quality of life for citizens, particularly the impoverished. Vietnam is another nation that follows this methodology. Vietnam designates social housing as a prioritized real estate category, limiting ownership to a specific group. Article 76 of the 2023 Housing Law specifies that only twelve categories of individuals qualify for special social housing policies. Conversely, individuals in need can access social housing, regardless of their financial resources or income levels. Central or local government entities, along with non-profit housing associations, will subsequently supply social housing to the market. Singapore clearly subscribes to the second perspective. The sale of social housing in Singapore at equitable prices for all citizens, irrespective of socioeconomic status, fosters motivation to work, encourages savings plans, and, most importantly, instills a sense of personal responsibility for one's future.

Upon its initial emergence, social housing primarily served as rental accommodation. Currently, in most countries, social housing is offered to the market in two primary forms: sale and rental. Besides the two fundamental forms of sale and rental, Vietnam also offers the option of social housing lease-purchase.

The following is a comparative table detailing social housing transactions, subjects, and eligibility criteria for social housing policies, along with incentives for Vietnamese investors and those from Korea, China, Singapore, France, and the United States participating in social housing construction (Table 1).

TABLE 1. Key provisions of social housing in Vietnam, South Korea, China, Singapore, France and the U.S.

Characteristics Nations	Social housing transactions	Policy beneficiaries support social housing	Conditions for enjoying the policy social housing	Investment incentives social housing
Vietnam	<ul style="list-style-type: none"> • Buy and sell • Lease • Hire purchase 	<p>Limiting the beneficiaries of social housing policies. There are only 12 groups of beneficiaries listed in Article 76 of the Housing Law 2023.</p>	<ul style="list-style-type: none"> • For sales and hire-purchase transactions: meet 2 conditions on housing and income. • For social housing rental transactions, it is only necessary to have the right target, without having to meet housing and income conditions. 	<ul style="list-style-type: none"> • Exemption from land use fees and land rent; • Value added tax, corporate income tax; • Enjoy a maximum profit of 10% of the total construction investment cost for the social housing construction area; • Up to 20% of the total residential land area within the project area has been invested in building technical infrastructure systems to invest in building business, commercial and residential services; • Get loans with preferential interest rates; • The Provincial People's Committee supports the connection of the project's technical infrastructure system with the regional technical infrastructure system, ensuring synchronization of social infrastructure within and outside the project scope.
South Korea	<ul style="list-style-type: none"> • Buy and sell • Lease 	<p>People have low income There are 10 groups of subjects.</p>	Based on income	Enjoy capital and financial incentives.
China	<ul style="list-style-type: none"> • Buy and sell • Lease 	<ul style="list-style-type: none"> • Low-middle income workers. • It also includes other groups such as urban households, employees of government agencies and organizations, and talent attracted by businesses. 	<p>Must meet 3 conditions:</p> <ul style="list-style-type: none"> • Income: low income compared to local average income; • Housing: average housing area is less than 7 m²/person; • Have a bank account: 90,000 Yuan or less (about 300 million VND). 	Companies involved in building social housing are given loans from the government and exempted from certain taxes.

TABLE 1. CONTINUACIÓN

<div> <div>Characteristics</div> <div>Nations</div> </div>	Social housing transactions	Policy beneficiaries support social housing	Conditions for enjoying the policy social housing	Investment incentives social housing
Singapore	<ul style="list-style-type: none"> • Buy and sell • Lease 	Open to all Singapore citizens	<ul style="list-style-type: none"> • Income: as of 2023, the income ceiling for a typical BTO apartment is \$14,000 for families; • Nationality: Singapore citizen and permanent resident; • Marriage: the applicant must form a family unit. • In addition, must meet age requirements (21 years or older). <p>Applicants are also required to limit their property ownership, to ensure that HDB flats are given priority to those in genuine need.</p>	<ul style="list-style-type: none"> • Government tax exemption and reduction; • Credit support (long-term loans with low interest rates, grace period loans); • Provide some guarantee mechanisms, provide land, infrastructure. • Apartments designed, built and priced by private individuals will be subsidized by the Government at a price lower than the market price. <p>In addition, private organizations participating in the construction of social housing in Singapore are also supported by the State with clear, transparent and quick administrative procedures.</p>
France	<ul style="list-style-type: none"> • Lease 	<p>Low-income people.</p> <p>There are priority groups for social housing: Homeless; People at risk of eviction; People living in substandard housing; Overcrowded households; Disabled.</p>	<ul style="list-style-type: none"> • Income limits: households must not exceed an income threshold, which varies by region and family size; • Residency status: applicant must be a legal resident or have a valid residence permit; • Housing needs: priority for individuals in precarious circumstances. 	<ul style="list-style-type: none"> • Land tax exemption for social housing project owners: The government compensates the exempted tax amount to the local government; • Applying a preferential value-added tax rate (5.5%), in return the Governor has the right to retain 30% of the project's apartments, of which 5% is reserved for government officials.
The U.S	<ul style="list-style-type: none"> • Lease 	<p>Low-income families and individuals.</p> <p>Old person.</p> <p>People with disabilities.</p>	<ul style="list-style-type: none"> • Total annual income; • Qualify as a senior, disabled person or family member; • US citizenship or immigration status. 	<p>The federal government provides grants to private organizations;</p> <p>LIHTC provides tax incentives to developers to encourage the construction or renovation of homes;</p> <p>The government provides credits.</p>

Fuente: Compined by author.

It is evident that not only Vietnam, but also numerous countries worldwide, including Singapore, South Korea, France, China, and the United States, implement social housing policies to address the housing needs of low-income individuals at a fundamental level. Each country has distinct regulations, stipulations, and incentives for investors regarding social housing policies and the construction of such housing. These regulations are contingent upon the socioeconomic conditions of the nation. Notwithstanding these disparities, the predominant objective remains the provision of affordable housing to guarantee social security, thereby enhancing individuals' quality of life. Providing housing is a significant humanitarian strategy and is recognized as a political objective, playing a crucial role in the robust development of the nation's economy.

CONCLUSION AND RECOMMENDATIONS FOR VIETNAM

Given the persistent escalation of commercial housing prices to unprecedented levels, advancing the development of the social housing sector is deemed a crucial strategy to address the existing deficit of affordable housing, fulfill the populace's housing requirements, and uphold social stability. Achieving the established objectives necessitates supplementary solutions that can engage and attract both investors and home purchasers. The author proposes the subsequent recommendations:

Social housing is a policy of significant humanistic importance as it addresses the individual aspiration of establishing stability and pursuing a career. From 2021 to the present, a synthesis of local reports indicates that 655 social housing projects have been executed nationwide, encompassing 593,428 units. Of these, 103 projects have been completed, totaling 66,755 units; 137 projects have commenced construction, amounting to 114,618 units; and 415 projects have received investment approval, comprising 412,055 units. To date, 66,755 apartments have been completed, representing approximately 15.6% of the project's goal for 2025 (Minh, 2025). A primary reason social housing projects have failed to meet their objectives is the complexity and entanglement of legal procedures. Despite distinct regulations for social housing, administrative procedures remain lengthy, resulting in extended project completion times that adversely impact investment efficiency. For instance, the implementation of commercial housing projects involves numerous procedures; however, social housing projects fundamentally adhere to similar procedures. Social housing projects are exempt from land price determination procedures; however, they are required to undertake procedures for establishing selling prices. The social housing policies established by the 2023 Housing Law are significantly enhanced in comparison to those outlined in the 2014 Housing Law. Coordination and facilitation among law enforcement agencies are necessary, with an emphasis on ensuring progress and preventing delays. Prolonging time entails financial resources, labor, and returns for investors. Consequently, Vietnam ought to emulate Singapore's approach of endorsing social housing investors by instituting clear, transparent, and expedited administrative procedures to assist investors in the construction process and reduce bureaucratic obstacles. Consequently, it will incentivize businesses to engage in construction, thereby augmenting the availability of social housing.

The preferential policies for investors in social housing projects in Vietnam are insufficiently appealing. Limitations on profit margins render social housing projects less appealing compared to commercial housing. Numerous enterprises contend that constructing social housing is more challenging than erecting commercial housing due to the implementation mechanism, wherein investors are restricted to a maximum profit of 10% despite their investment in construction.

Consequently, it is essential to increase the social housing profit margin for investors to 15% from the stipulated 10% in Point c, Clause 2, Article 85 of the 2023 Housing Law. Increasing the profit margin will incentivize investors to engage in the development of social housing, a crucial sector in addressing the housing requirements of low-income individuals. Enhanced policies for investors are essential to expedite the achievement of the objective of constructing a minimum of one million social housing units. Clarifying the responsibilities of the state and investors is also essential. Investors are more likely to engage in social housing projects when they acknowledge the potential and governmental support, thus yielding tangible benefits for the populace and fostering the nation's sustainable development. When investors perceive the construction of social housing as their obligation and anticipate "substantial" profits, they will be more effective in providing housing for individuals. In a manner akin to how social housing investors in Korea perceive the development of social housing as their obligation. Only then will the Vietnamese economy experience more vigorous growth in the future, as stable housing incentivizes individuals to engage in labor and production.

Third, rental social housing models are present not only in Vietnam but also in numerous countries worldwide, including South Korea, China, France, Singapore, and the United States. Nonetheless, not all individuals in Vietnam are aware of their eligibility to rent social housing. Consequently, they frequently lease long-term rental apartments. The rental apartments' pricing will be determined by the landlord, resulting in costs exceeding those of social housing. Long-term rental apartments are typically occupied by individuals with limited financial resources, including laborers, public servants, students, and low-income individuals. Nonetheless, long-term rental apartments in Vietnam have not been classified as social housing. Designating long-term rental apartments as social housing will not only provide workers with stable, affordable, and high-quality housing but also alleviate the burden on extensive social housing initiatives. This is a pragmatic solution for the development of sustainable housing, tailored to the requirements of millions of workers and low-income individuals in major urban areas. Furthermore, landlords receive tax and credit incentives for infrastructure upgrades and renovations, along with reduced rent, electricity, water prices, and related service expenses.

Fourth, Vietnamese legislation should draw insights from the French social housing model regarding the prioritization of specific groups eligible for social housing assistance policies. The establishment of regulations regarding the hierarchy of eligibility for purchasing, renting, or rent-to-own social housing in social housing initiatives is a pragmatic approach to guarantee equitable and just distribution of social housing, catering to individuals genuinely in need. The housing requirements of cadres, civil servants, and public employees differ significantly from those of impoverished households in rural areas, while the latter also have distinct housing needs and support mechanisms compared to workers in industrial zones.

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