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**Master of Social Sciences in
Comparative Social Policy (International)**

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SOC 605 Comparative Social Policy Research Project

**A Comparison of Public Housing Policies for the
Elderly in Hong Kong and Singapore**

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1. Introduction

1.1 Research Background

With the development and progress of society, people are seeking a long and healthy life with improved quality of life and a better living environment (Fang et al., 2020). Due to Asia's more significant and faster-growing population (Wang et al., 2020), perverse urbanization (Yucui, 2018) and rapid economic development, poverty has increased (Cruz & Ahmed, 2018). Meanwhile, in terms of population aging, various countries and governments have begun to pay attention to the issue of old-age welfare policies (Lu & Liu, 2019). Most countries in the world are experiencing the growth of demographic aging (World Health Organization [WHO], 2017). Like many other economies worldwide, Singapore and Hong Kong are experiencing rapid population aging. In Hong Kong, there are approximately 1.4 million people aged 65 or above in 2021, accounting for 20% of the total population, and the population of the elderly is expected to increase up to 2.514 million by 2043, accounting for about one-third of the total population and further up to 2.58 million (or accounting for 35.9% of the total population) in 2064 (Elderly Commission, 2017; Census and Statistics Department [C&SD], 2021; Elderly Commission, 2021; UNESCAP, 2021; The World Bank Group, 2021). On the other hand, the proportion of Singapore population aged 65 and above has increased from 11.1% in 2012 to 18.4% in 2022, which is expected to see its aging population rise to 23.8% by 2030, and to 34.7% by 2050 (National Population and Talent Division [NPTD], 2022; UNESCAP, 2021; The World Bank Group, 2021).

The social welfare policy in Singapore is based on the individual and family as the foundation, the community as the middle-level organization, and the government taking a residual complementary role and a small amount of public assistance (Quah, 2018). Currently, the elderly care services in Singapore are mainly provided by private sector organizations and voluntary welfare organizations (VWO) to help the local elderly. Elderly care in Singapore is broadly divided into community and residential healthcare services. Community health care includes home-based services such as general nursing

care and home hospice care. In addition, community health care also provides home-based services such as day rehabilitation centers and care centers for the elderly and families. Most centers and caregivers will offer different long-term and short-term programs based on the different needs and demands of seniors. Residential health care services include nursing homes, community hospitals, respite care and inpatient hospice services (Ministry of Health [MOH], 2022)

In contrast, the elderly care model in Hong Kong consists of three types: aging in place, residential care, and aging out of Hong Kong (Jayantha, Qian & Yi, 2018), of which the former is the primary elderly care model in Hong Kong. The Hong Kong Special Administrative Region (HKSAR) government has attached great importance to this work after the publication of the World Health Organization's (WHO) practice initiative 'Global Guidelines for Age-friendly Cities' in 2007 (WHO, 2007). Based on the three principles of elder perspective, elder participation, and elder appropriateness proposed by the WHO, the Hong Kong government began to weave and implement an elder-friendly community development plan in 2008, enriching and developing the following eight specific aspects more comprehensively. Such plan includes convenient public transportation aspects, appropriate residential transformation aspects, comfortable outdoor environment aspects, inclusive community interaction aspects, and smooth social (WHO, 2022; Gibson et al., 2022). In December 2008, the Professional Committee on Elderly Services of the Hong Kong Council of Social Service organized the Steering Committee on Age-Friendly Communities in Hong Kong to promote this work (Elderly Commission, 2017). Public housing in Singapore, known as government flat, is the most common type of housing in Singapore, with approximately 85% of residents living in public housing, of which about 94% are owner-occupied and the remaining 6% are rented, essentially achieving homeownership (PropertyGuru, 2021). In contrast, public housing in Hong Kong is mainly provided by the Hong Kong Housing Authority (HKHA), one type of housing for the senior citizens and one type of small self-contained small flats (Hong Kong Housing Authority [HKHA], 2022a).

1.2 Research Question

Each society and country will have a definition of the elderly, usually using age as a criterion to define the elderly. Hong Kong sets the age of 65 as the standard for the elderly, and provides services for the elderly, but in some policies, Hong Kong will adopt the age of 60 more loosely (Lum et al., 2020). Singapore refers to citizens over 60 as seniors (Grey, 2022) and has set separate Central Provident Fund (CPF) contribution rates for citizens aged 60-65 and 65-70 to help the increasing citizens' retirement income through several schemes (Central Provident Fund Board [CPF Board], 2022a). Since elders somehow lose their ability and have less opportunity to earn money, they are much more dependent on housing than younger people. As becoming older, elders' behavioral abilities will diminish and their practical requirements for housing environment and amenities will exceed those of younger people. If suitable elderly housing and facilities support the provision of the elderly, it can enable the elderly to gain self-sufficiency, self-care ability and confidence, and reduce the burden on society and family. The provision of housing for the elderly needs the support of government policy and government provision (Ten Bruggencate, Luijckx & Sturm, 2018).

Despite the efforts of the Hong Kong government in housing, it is implemented not as effective as expected. Also, the housing policies in Hong Kong still need to address the housing needs of the people adequately. Currently, housing has become a more serious social issue in Hong Kong, and has been increasingly concerned by the media and the public. Holliday (2014) ranked Hong Kong as the number one metropolitan market for severely unaffordable housing, as housing affordability in Hong Kong is low compared to other places, and unaffordable housing prices have led to many living problems. A comparative study of elderly housing policies in Hong Kong and Singapore would help improve the efficiency of government investment in housing for the elderly and the effective allocation of public resources and services. The government is actively introducing market forces to promote elderly housing policies (Li et al., 2018). Therefore, the research questions of this report are as follows:

- 1) Whether the public housing model for the elderly currently used in Hong Kong and Singapore is compatible with the housing problems in East Asia.
- 2) Is the Singapore model of senior public housing applicable to Hong Kong?

Currently, urban population aging is a serious challenge faced by governments around the world (Van Hoof et al., 2018). Many academic studies have been conducted on the elderly, but most of them are oriented towards studying the impact of the elderly on society as a whole and formulating corresponding policy from a macro perspective. In contrast, fewer studies have been conducted from a micro aspect, specifically analyzing the elderly housing and the resulting elderly welfare issues. Therefore, this report will demonstrate whether the current elderly public housing models used in Hong Kong and Singapore are in line with the general thinking on housing in East Asia. By comparing and analyzing the elderly housing policies in Hong Kong and Singapore, this study will explore how social institutions support the construction of the public housing system and draw inspiration from the success of Singapore's public housing policy.

1.3 Research Content

This report will collect and organize the relevant literature to explain the current situation of public housing policies for the elderly in Hong Kong and Singapore respectively, and on this basis, conduct a comparative analysis of the public housing policies of the two economies. By comparing the policies of the two economies, this report will analyze the actual situation constrained by those circumstances that cannot achieve the ideal results, and will provide valuable references for improving the public housing policy for the elderly from theoretical research to practical implementation. By looking for relevant experiences worthy of reference in the existing public housing policies for the elderly, this report will also make suggestions for the optimization of the existing public housing policies for the elderly to improve the management of local

public housing policies for the elderly. This study will be divided into six parts as follows.

- 1) The first part is the introduction. This section will introduce the research background, the purpose of the study and the content of the study. The main purpose of this study will be outlined by briefly describing the background and implementation of the elderly public housing policy in Hong Kong and Singapore.
- 2) The second part is a literature review. This part will organize the literature related to the elderly public housing programs in Hong Kong and Singapore to prepare the ground for further analysis.
- 3) The third part is the methodology, briefly describing the research methodology of this study.
- 4) The fourth part is the analysis of public housing policies for the elderly. As the core of this study, this section will analyze the public housing policies of Hong Kong and Singapore through various aspects and conduct a comparative study. The current situation of the elderly public housing policies in the two places will be illustrated to prepare the ground for the next step of analysis of the difficulties.
- 5) The fifth part is the discussion and suggestions for optimization. This part identifies the difficulties faced in the existing policies of the two regions through comparative analysis, and gives further suggestions for optimization of the implementation of public housing policies for the elderly in Hong Kong as well as in other regions.
- 6) The sixth part is the conclusion and limitations, which will summarize the findings and limitations of this study.

2. Literature Review

2.1 The Concept of Aging in Place

Over the past two decades, the concept of aging in place has been more widely

discussed and studied (Wiles et al., 2012). The concept of aging in place emphasizes the ability and importance of older adults to grow old in their living environment and the possibility of the necessary support that the elderly receive from their community, loved ones, and friends (Mesthrige & Cheung, 2020). In other words, older adults want to stay in their own homes for longer because it gives them a sense of freedom and they want to control their lives (Caspari et al., 2018). Many studies have proven that aging in place is beneficial for the physical and mental health and quality of life of older adults and financially beneficial for decision-makers (Lehning, 2012; Srivastava et al., 2021; Van Leeuwen et al., 2019).

Socially, aging in a familiar environment can give older adults a sense of place attachment and self-identity (Sun et al., 2022). Although aging is strongly associated with increased rates of physical dysfunction and chronic disease, evidence suggests that social and community support for older adults to age at home can delay their dysfunction (Calderón-Larrañaga et al., 2019). Such an approach to aging can have many positive outcomes, such as improving the physical and mental health of older adults, and can improve the quality of life of older adults. It can help governments to preserve public health, maintain functional capacity and reduce the need for long-term care for middle-aged and older adults in the public health care system (World Health Organization, 2022; Wiles et al., 2012).

Economically, population aging affects several socioeconomic aspects, and views in this regard focus on the macro level (Seeman & Crimmins, 2001), tax system changes, consumer behavior, labor costs, and the quantity of labor supply (Calvo-Sotomayor, Atutxa & Aguado, 2020; Paltasingh & Tyagi, 2012). Population aging can dampen consumption, with the rise in the old-age dependency ratio being an essential reason for the reduction in consumption capacity (Wong, 2018), and population aging significantly reduces the consumption expenditures of urban residents (Nerlich &

Schroth, 2018). Overall, an aging population generates higher public spending on care services, which is an important challenge for the government (Cummins, 2018). Aging in place combines the characteristics of family and social aging, which can reduce costs for both families and society (Low et al., 2022). In addition, aging in place can make the best use of existing community resources. For families, it reduces the burden on families and saves money by eliminating the need to stay at home to care for the elderly or by reducing the cost of hiring professionals. For the national community, the cost of building facilities and professional services can be relatively reduced, thus the cost for both parties can be reduced significantly. The care services provided by traditional senior care facilities have been the focus of policy for providing care services for the elderly (Feng et al., 2012). As aging deepens, the demand for and reliance on institutional care services for older adults is likely to increase and ultimately place a more significant burden on government spending on public health, especially in cases where older adults are acutely ill or require long-term care. In addition, standardized care still suffers from higher costs and insufficient beds and elderly care staff (Fahim et al., 2019; Mohiuddin, 2020). As a result, policymakers and some professionals see aging in place as a way to make policies financially sustainable (Carbonaro et al., 2018). Aging in place can support the long-term health of older adults as they age (Peek et al., 2019).

However, improper state policies or the implementation of aging in place may lead to more serious social problems (Jayantha, Qian & Yi, 2018). For example, if an older person's home space is small, it may result in a crowded living environment with several inconveniences (Neves, Sanders & Kokanović, 2019). Also, policies do not guarantee that every older person has the proper space to age in place (Van Hoof et al., 2018). The general lack of awareness of aging in place in families or communities may result in some other wasted facilities (Carver et al., 2018). In addition, poorly designed policies for aging in place may result in a lack of resources for aging in place, including physical resources and human resources (medical staff and elderly caregivers). Material

resources mainly include medicines and assistive devices that the elderly usually need, such as disease monitoring devices for the seriously ill or demented elderly, which cannot be allocated in the home. These shortcomings may cause the elderly living alone to experience some strong emotional frustration or mental illness, as they may not receive adequate social support or the environment in the home and the community prevents them from adapting, which can weaken the elderly's ability to live alone. The lack of appropriate social and health care services can increase the suffering of older adults, who may experience higher levels of isolation and depression (Domènech-Abella et al., 2019; Singer, 2018).

Conversely, aging in place receives more social support when properly designed and implemented (Van Hoof et al., 2018). Aging in place is more popular with seniors than care facilities. Data from China's Civil Affairs Bureau 2020 shows half of the 4.29 million beds in China's 42,300 elderly care facilities are vacant (Xinhua, 2020). Older people are less mobile than younger people and often choose to live in their own homes. According to a survey in the Pension Series report, 90% of Chinese seniors adopt a home-based approach to aging (Zhang et al., 2020), preferring not to age in an institution and preferring to be cared for at home by their own children.

Similarly, a 2012 AARP (previously known as the American Association of Retired Persons) survey shows that more than 90% of American seniors prefer to continue living in their current homes (Gibson et al., 2022). For many older adults, moving to a residential care facility is often an uncomfortable option because they may not be able to adjust to the new environment of a care facility. A residential move can result in a loss of social relationships with friends and neighbors, changes in daily routines and routines, and it can be detrimental for older adults to lose their possessions by moving to a smaller space in a residential apartment and forgetting about them, as well as losing their independence. Older adults' attachment to their homes is often reflected in the social and physical characteristics of their neighbors (Buffel & Phillipson, 2019).

Among older adults, independence and autonomy are the reasons why they choose to age in place, believing that moving into a nursing home or other forms of institutional care will cause them to lose their independence. Prolonged isolation and lack of independence can lead to mental illness, emotional stress, and physical deterioration in older adults (Fogel, 2019; Carnemolla, 2018).

2.2 Typologies of Welfare Regimes

Many scholars have classified the types of social welfare regimes, and the most representative one is Esping-Anderson's typology of welfare regimes, which classifies the welfare regimes established in Europe and the United States into three categories based on the degree of decommodification and social stratification, which are liberalism, conservatism and social democracy (Jing, 2021; Stephens, 2016). In fact, in the field of comparative social policy research, researchers often use different terms or concepts, such as welfare systems, welfare models, and welfare states interchangeably to describe and explain the similarities and differences between different types of national systems (Van Der Veen & Van der Brug, 2013). Esping-Andersen and many subsequent Western scholars had long focused their comparative studies of welfare systems within capitalist countries, ignoring other non-capitalist country types of welfare systems (Dale & Unkovski-Korica, 2022). However, developing countries and even some newly industrialized countries or regions differ from the Western welfare state type and have unique cultural, political and economic institutional characteristics and welfare structures.

Welfare state systems have experienced the dual effects of economic globalization and regional integration processes since Esping-Andersen's 1990 typological analysis of three types of welfare capitalist worlds (Seeleib-Kaiser & Sowula, 2020). Nation-states face similar problems at the level of domestic political and social change, but different situations generate different pressures for welfare system reform, and distinguishing

between types of welfare systems is difficult to achieve with a single decommodification indicator (Thompson, 2022). Traditional social insurance or tax-based welfare systems do not encounter many of the new social risks facing the welfare state as it enters the post-industrial economy (Binder & Haupt, 2022).

In this new historical period, it becomes important to break away from established research paths and comparative analysis methods and to enhance the exploration of new typologies of welfare systems. It is worth paying attention to the fact that in the context of changing globalized economic waves and technological changes, new patterns of retirement and forms of employment will have a significant impact on the content of social security and social services, which will undoubtedly determine the future construction and development of welfare institutions (Behrendt, Nguyen & Rani, 2019). Although Esping-Andersen's discussion of welfare institutions is significant for the study of comparative welfare states, as he points out, his research focuses on developed countries, whose welfare systems are largely established and stable (Kwon, 2019). For newly industrialized countries and regions, the logic of their welfare system development is different due to differences in their political environment, level of economic development, and the challenges of globalization they face (Daly & Lewis, 2018; Borchorst & Siim, 2018).

2.3 The Welfare Model of East Asia

East Asian welfare has been described by the existing institutional approach of the countries as a low level of government intervention and social welfare investment (Schmidt, 2019). However, the socioeconomic structure of East Asian countries was altered by democratization in the 1980s, leading them to rethink their welfare commitments (Friedman, 2019). The restructuring of their welfare systems was also accelerated by the financial crisis and globalization of the late 1990s (Deese & Biasi, 2022). This new ideological thinking is unique to East Asian countries that developed

development thinking from a global perspective at the beginning of their industrial development. It may demonstrate the will to succeed economically, while not excluding the possibility of introducing social security and welfare programs. Indeed, East Asian governments have been largely reluctant to expand the coverage of social security and welfare systems (Lu et al., 2020). This is because social rights are first limited to economic participation and public commitment to society, especially housing, health care, and education (Sabatello et al., 2020). It has been suggested that governments are trying to limit the influence of unions on welfare policies (Durazzi, Fleckenstein & Lee, 2018; Stubbs & Lendvai-Bainton, 2020). This feature is a direct result of the development strategies of East Asian economic-friendly political systems during the period of rapid economic growth in the second half of the 20th century.

Governments began implementing large new security programs throughout East Asia due to pressure from social movements and social welfare advocates (Aspalter, 2006). In Japan, child allowance benefits and health care services were introduced for the elderly in the 1970s (Lindqvist & Lamichhane, 2019). In addition to child allowance and health care services, Japan introduced a long-term care insurance program in 1997 and an unemployment benefits program (Talcott, 2002). Similar programs were introduced in South Korea in 1995 and in Taiwan in 1998 (Aspalter, 2006). Singapore upgraded its social security system by adding new benefits to its provident fund system (Vasoo & Lee, 2001). Singapore has long been expanding its Central Provident Fund system to maintain social security benefits such as old-age income, health care needs, and housing (Waring, Vas & Bali, 2022). In addition, Hong Kong expanded its spending on the social welfare system in 1990 in response to increased unemployment, poverty, immigration, and an aging population (Yang & Kühner, 2020). However, all of the above welfare systems are to some extent ordinary because they do not divide the workforce into different segments of society that are strong and weak.

Currently, the most studied aspect of the comparative welfare state literature is the development perspective, with numerous scholars suggesting that the common denominator of social welfare policies in East Asia stems from the shared development ideology of the ruling elite (Haggard & Kaufman, 2020; Kronauer, 2019). However, social development and policies in general have sometimes been subordinated to the country's economic development goals, especially in Singapore and Hong Kong after the mid-1960s, during which social policies were designed to promote socioeconomic development and prosperity (London, 2018; Naseemullah, 2022). What East Asian welfare systems, from Japan to Singapore, have in common is the high value placed on a harmonious developmental relationship between the economy and society. This has been reflected in the dominant ideology of the government and implies that social support and promoting economic growth have been sought (Schmidt, 2019; Greener & Yeo, 2022). Indeed, a vital feature of the East Asian welfare model is its ability to focus on social issues, such as commitment to and support for health care, human resources, housing and etc. Social rights in East Asia are primarily directed toward economic participation through the realization of markets, substantial public investment in health, education, and housing, and state commitment to social security (Estrada et al., 2020; Naher et al., 2020). The Southeast Asian welfare model is essentially designed to facilitate, rather than impede, welfare provision by markets and households.

As a result, the welfare logic that has dominated for many years has changed to various degrees and in different areas, and the demand for welfare policies has increased. New welfare policies and institutions, both specific and universal, are being applied more often than ever before.

2.4 Public Housing Regimes

After the World War II, European countries began to implement several public housing policies to restore the national economy and social production and meet the post-war

housing shortage (Scanlon, Whitehead & Arrigoitia, 2014). Funded by the central government and managed by the state governments, public housing together with the housing market formed an essential part of the urban built-up space.

In terms of international comparison, social democratic European welfare states such as Germany, France, Sweden, and the Netherlands have developed unified housing markets since 1945, in which a large supply of public housing is targeted to most social groups (Flora & Alber, 2017). In contrast to the high welfare states of Western Europe, the liberal welfare states (such as the United States and Australia) have implemented a preferential model of housing security that targets only low-income classes and special groups, resulting in a dual housing market (Hulse, 2003). The residualization of public housing and the strict segregation of the conventional housing market has become the dominant model in the liberal welfare states (Kholodilin, Kohl & Müller, 2022).

From the 1980s onwards, the welfare state embarked on fiscal austerity, trade liberalization, and the rise of neoliberal political agendas such as privatization and deregulation (Hemerijck, 2013). At this time, public housing systems in many EU countries began to follow the model of the liberal welfare state, and responsibility for public housing began to be devolved to local governments (Anderson, 2004). During the same period, housing assistance policies in the United States also underwent significant changes, with housing programs targeting groups more precisely the low-income class, excluding the middle and lower middle classes from coverage, and eliminating government housing construction. The government gradually reduced its support for affordable housing construction and shifted to supporting private sector construction of affordable housing through tax credits. As financial support for public housing from the state and social institutions decreased, the public housing supply began to decline, and the commoditization orientation and scale adjustment of housing policies profoundly impacted urban development. At this time, European and American

countries attempted to re-energize rapid urban economic development by implementing urban revitalization strategies.

Kemeny argues that public housing systems are deeply rooted in broader welfare systems and political relations (Ruonavaara, 2020). The development of single-rental market countries since the 1990s did not follow the predictions of the theory. In Sweden and Germany, rental systems have adopted the typical features of a dual system. Stephens (2016) combines Kemeny's and Esping-Andersen's frameworks and finds that Kemeny's framework is less geographically mobile than Esping-Andersen's market-household framework. Stephens (2016) proposes that different countries need to choose different public housing systems and frameworks carefully; otherwise it would be pointless to make outdated or wrong choices.

3. Methodology

This research will use qualitative methodology with combining literature review and comparative research study and will analyze the public housing policies for the elderly in Hong Kong and Singapore. The combination of the literature and comparative research methods is chosen because this study's main content is to analyze and compare the elderly public housing policies in Hong Kong and Singapore. The literature research method can transcend the limitations of time and space and learn more about the social situation by investigating, organizing and studying the relevant literature, and this method serves as an indirect and non-interventional investigation. The two research methods chosen for the study are more convenient and can save less labor, money and time from obtaining more information, which is a free qualitative survey method. The qualitative research method will provide a complete and detailed description of the observations. This study does not provide predictions or causal explanations, but rather the explanations collected in this study.

Firstly, this report will access to relevant literature, government documents, statistics, journal articles and etc. to systematically understand the research status of the elderly public housing policies in Hong Kong and Singapore and to understand the latest progress of the research. By collecting relevant government documents, relevant data and other related academic case studies to find empirical practices about the public service policy for the elderly in the two places, the overall scientific nature of the article will be increased. Secondly, this report will explore the current research on public housing policy for the elderly by combing and summarizing the relevant literature on public housing policy for the elderly in Hong Kong and Singapore to pave the way for the next study. On this basis, thirdly, this study will conduct a comparative study of the elderly housing policies in Hong Kong and Singapore to find relevant experiences worth learning to learn from the successful cases and to provide some suggestions for optimizing the implementation of elderly public housing policies in each place.

4. Similarities between Hong Kong and Singapore

Hong Kong and Singapore are known for their free-market economic models, and both places have similar levels of development (David, 2016). Although Singapore is an English-speaking society, there are more Chinese (Tupas, 2011). As the traditional Confucian culture influences both places, there is no significant gap in the living environment (Zhang, Zhang & Zheng, 2020; Yeung, 2019). In terms of housing, both cities face the problem of scarce land and a dense population (Ng, 2020; Diehl et al., 2020). In fact, the highest percentage of the equity capitalization market in both places is in real estate and construction, which indicates that real estate has contributed significantly to the economic development of both places. Considering many similarities between the two places regarding social structure, population, land size, cultural background and economic development, so their social policies are comparable. These similarities can help the study to compare the elderly housing policies of the two places more fairly.

5. Hong Kong's Public Housing Scheme for the Elderly

5.1 Target Group

The issue of the elderly in Hong Kong has received attention and focus from the government and the public since the early 1970s (Yeung, 2020). In 1972, the Hong Kong government provided self-contained accommodation (HKHA, 2022b) and set up a working group to study the development of elderly services and recommended adopting community care to enable the elderly to stay in the community as long as possible (Housing Bureau, 2022). In 1997, the Hong Kong government identified “caring for the elderly” as one of the three major policy directions to improve the quality of the elderly’s life, proposing that the elderly should have a sense of purpose, a sense of belonging, and a sense of security in their old age (Mesthrige & Cheung). Population growth trends and social policy changes reflect that caring for the elderly is not only the responsibility of the family, but also of the community. In contrast, elders with no one to depend on or who are ill are in greater need of social care (Kim & Kihl, 2021; Jin et al., 2020).

The HKSAR's public housing program for the elderly takes different forms depending on the type of housing, and can be divided into three main areas. Firstly, for the majority of elders with low to moderate financial means who are largely self-sufficient, the Hong Kong government provides public housing with welfare in the form of tenancy agreements through the Hong Kong Housing Authority (HKHA) and the Hong Kong Housing Society (HKHS) (Chiu, 2010; Lau & Murie, 2017). Secondly, the government encourages the majority of the elderly people who have better financial means to purchase their own homes, and through the assistance of relevant departments such as the Home Affairs Department and the Urban Renewal Authority, encourages them to carry out building maintenance and improve their housing environment by providing subsidies or interest-free loans (Jayantha, Qian & Yi, 2018). Finally, for those who have no one to rely on or are in poor health or unable to take care of themselves, the

government will provide different levels of care in the form of subsidies from the Social Welfare Department (Chui, 2008; Yu, 1997).

5.2 Related Institutions and Policies in Hong Kong

The Hong Kong government mainly provides housing for the elderly through HKHA and HKHS (Hui et al., 2014). HKHA provides basic apartment housing with relatively low rents, similar to senior housing in mainland China (Lau & Murie, 2017). HKHS, on the other hand, is designed to be a one-stop shop for middle-income seniors, providing public housing in the form of long-term leases, similar to senior housing in mainland China (Li & Shamsuddin, 2022). The Hong Kong government operates a public housing program for the elderly mainly through the HKHA (Yau, 2012), which is intended to enable eligible elders to be allocated public housing as soon as possible. In addition, the program takes care of single older adults as well as families living with older people, who can also choose to live with other older people.

In 2013, the Hong Kong Government launched the Elderly Community Service Pilot Scheme to support the elderly to age in place by providing direct funding through vouchers to service users. In 2014, the Hong Kong government developed the Long Term Housing Strategy, the first long-term strategic policy on housing since 1998, which aims to help all Hong Kong households access affordable housing, including the elderly (News.gov.hk, 2018). In order to meet the needs of the elderly, the government offers a number of public rental housing programs that give priority to elderly applicants. Elderly applicants can apply for the Single Elderly Persons Priority Scheme as a single person, or they can apply for the Priority Scheme jointly with another older person. The elderly living with their families can also apply for the Tenants Purchase Scheme (TPS) as a general family.

In addition to the housing program, the government has also set up residential housing for the elderly, an independent non-profit housing agency that plays a more important supporting role in housing through several innovative housing programs in partnership with the government (Chui, 2008). For low-income seniors, the government is providing public housing to meet their needs, but at the same time, more and more seniors of better means are expecting a high-quality lifestyle. To meet the housing needs of more seniors, HKHS has planned and developed the Senior Citizen Residences Program, which is the first of its kind to provide lifetime rental housing to middle-income seniors on a user-pay basis. In 2008, the Hong Kong's economy center (HKEC) agreed to develop two elderly housing projects, and the Housing Society responded quickly to the Hong Kong government's policy (Chiu, 2010).

The Hong Kong government has developed a complex and rigorous assessment mechanism. Families in need of public housing are required to register on the Waiting List for public housing and are subject to a household income and asset test. The Hong Kong Housing Authority checks the 'waiting list' income, assets, and limits annually to ensure that the limits match the economic and social conditions and that only those in genuine need are eligible for public housing (Efficiency Office-1823, 2020). If a tenant misrepresents his / her information, the authority may terminate his tenancy and may prosecute them as provided by law (HKLII, 2019). The Hong Kong Housing Ordinance (HKHO) provides that any person who knowingly misrepresents information to the Hong Kong Housing Authority shall be liable on conviction to a fine of HK\$50,000 (HKHA, 2022c).

6. Singapore's Public Housing Scheme for the Elderly

6.1 Target Group

Singapore's social welfare policy is based on individuals and families, with the community acting as a mid-level organization and the government as a complementary

role providing a small amount of public assistance to individuals and families (Wei, 2020). Many of Singapore's social policies are based on public housing, such as Singapore's old age policy (Vasoo & Lee, 2001). First, Singapore promotes self-help retirement and gives concessions in Housing & Development Board (HDB) applications. The Singapore government encourages young people to buy public housing close to their parents by increasing the winning rate and providing appropriate subsidies, a policy that facilitates children's care for their aging parents and helps improve family cohesion (Deng, Sing & Ren, 2013). Second, public housing is the core of the improvement of elderly facilities. The Singapore government has built senior centers on the ground floor of public housing in the community to provide a well-equipped recreational space for the elderly (Tao et al., 2021). The government has been upgrading the pro-elderly infrastructure in public housing, such as the "Easy Aging" program, which helps the government install pro-elderly infrastructure in their homes. At the same time, the government uses the residents' liaison office to promote the development of social organizations for the elderly so that community social organizations can participate in the provision of elderly services. Again, the government has implemented a lease buy-back program to meet the diverse needs of the elderly. In Singapore, public housing generally has a 99-year tenure (lease), and eligible homeowners can not only flexibly choose to keep the lease for a certain number of years according to their age and life expectancy, but also sell the remainder back to the government. In this regard, they can receive a fixed monthly interest to subsidize their pensions and improve their quality of life (Deng, McMillen & Sing, 2012). In some ways, this is a very flexible and convenient system for selling a home for retirement.

6.2 Related Institutions and Policies in Singapore

In 1997, NTUC Insurance Co-operative Limited first launched its housing retirement business in Singapore, which was designed for Singaporeans aged 60 and above who owned private commercial properties (Addae-Dapaah & Wong, 2001). This was the first form of housing pension in Singapore, but the general public did not accept it. The main

reason for the lack of promotion of NTUC's housing pension business is that the business is mainly targeted at the elderly who own private commercial properties, while only 20% of the population in Singapore owns private commercial properties (Phang & Helble, 2016). Secondly, people were reluctant to participate in this housing retirement business due to its immaturity and the high risk involved. This was the first phase of the implementation of housing pension in Singapore and it can be said that the housing pension business in Singapore was not successful in this phase. In 2006, in order to increase participation in housing retirement, HDB Singapore proposed a scheme where the elderly who own HDB flats can also participate in housing retirement (Chua, 2014). Specifically, the scheme involves the repurchase of HDB flats owned by older people, and HDB provides a certain amount of pension subsidy to the residents, who can still live in their original HDB flats during the repurchase period. In this policy housing pension model, the two parties involved in the scheme have been expanded from a small number of private homeowners to policy housing owners, and from private financial institutions to government agencies such as HDB, which has to a certain extent increased the trust of residents in this business and reduced the risk. As a result, the policy-based housing pension has achieved some success, as it was the first policy-based housing pension introduced by the Singaporean government after the poor implementation of a private housing-based housing pension (Vasoo & Lee, 2001). This policy-based housing pension is still being explored. However, as it extends the scope of housing pension participation to HDB flat owners, it is bound to solve the retirement problems of some older people living in HDB flats.

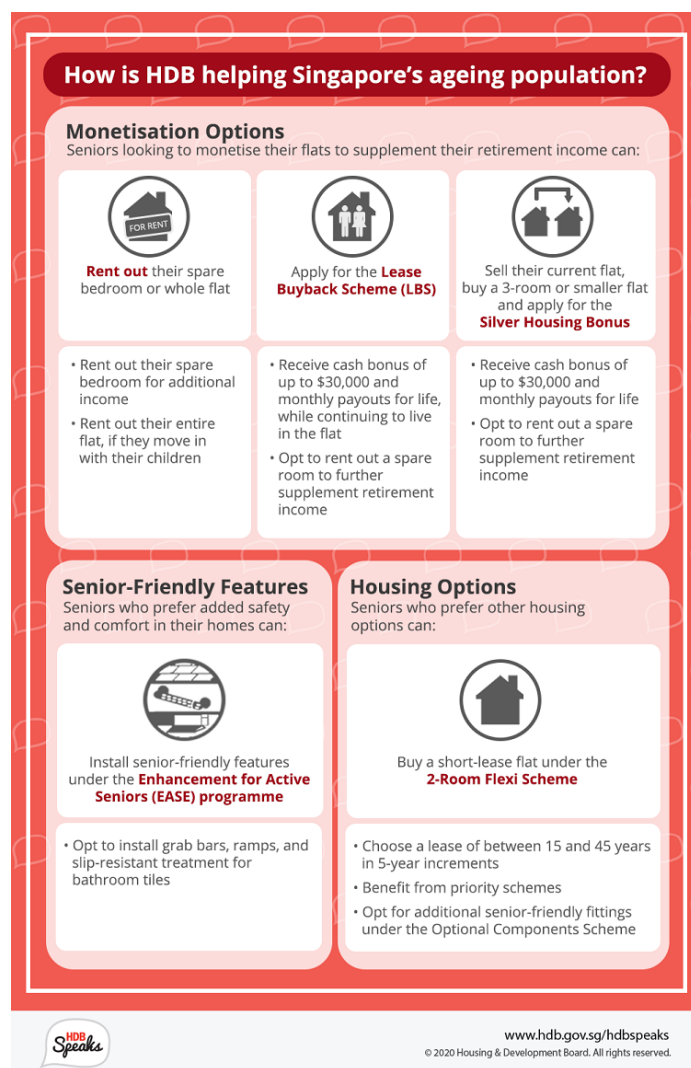


Figure 1: How is HDB helping Singapore's ageing population?

(HDB, 2022a)

In addition, the Housing & Development Board (HDB) in Singapore has taken several steps to help local seniors meet their housing needs. According to Figure 1, there are several measures taken to meet the elderly's needs and demands, including unlocking the housing value through monetization options, establishing a short-lease 2-Room flexible apartment housing options, as well as providing newly-typed flats with comprehensive care service. To increase the comfort and safety of senior housing, HDB has also installed senior-friendly features in homes (HDB, 2022a). Singapore also allows eligible HDB flat owners to retire in other ways, such as renting out all or part

of their existing HDB flats in exchange for rent, or selling their existing larger HDB flats in exchange for another smaller HDB flat, i.e. using the differences in price between the larger flats to retire (HDB, 2021a). The successful implementation of the above-mentioned policy-based housing pension model is not only guaranteed by the government, but also by the law and the system. After more than two decades of development, Singapore's housing pension not only extends from private commercial housing to policy housing, but also offers a variety of forms of housing pension for residents to choose from.

It is noteworthy that the Singapore government places a high priority on homeownership and considers housing as a basic right and need of the people. In Singapore, people have equal rights and opportunities to become homeowners, and this rights-based view of welfare has succeeded in bringing home ownership in Singapore to 88.9% (Singapore Department of Statistics, 2022a). By controlling the housing price, people can choose the private or public sector flat they want to live in. In addition, Singapore's rental eligibility prevents people from treating housing as a financial product and ensures everyone's right to housing. Restrictions on homeownership for public housing have reduced speculative activities. These different policies provide security for more people's housing needs.

7. A Comparative Analysis of Hong Kong and Singapore's Public Housing Policies for the Elderly

Although the two places share similar housing models, they have led to different housing outcomes. Specifically, Singapore's housing policies have led to high-quality housing and extremely high homeownership rates, while Hong Kong has experienced negative impacts such as housing shortages. As a result, Singapore's public housing scheme for the elderly is generally considered more successful than Hong Kong's (Hung, Bai & Lu, 2016; Kwong & Fong, 2022; Ker, 2019). Residential condominiums built by

HDB Singapore are sold in imitation of Hong Kong's Home Ownership Scheme (HOS) (Chuang, 2022). However, according to current statistics, Singapore's public housing policy has successfully addressed the need for local elderly homeownership over the past 30 years, while Hong Kong needs to face an increasingly tight situation.

In 2020, 80% of Singapore's residents lived in public housing under the Housing and Development Board (HDB) (Singapore Department of Statistics, 2022b), compared to 45% in Hong Kong (Hong Kong Housing Authority [HKHA], 2021). Over 80% of the elderly in Singapore lived in public housing (Guanyinmiao, 2020), and 35% of the elderly in Hong Kong were in HDB public units (Housing Bureau, 2022). Another interesting comparison is that only about 5% of land in Singapore was classified as protected, undevelopable land (PropertyGuru, 2020), while in Hong Kong, untouchable land occupies 40% of the land area (Planning Department, 2022; Zhang, 2022). Before starting the comparison, general market conditions need to be examined. In Hong Kong, according to the Hong Kong Housing Authority (HKHA) statistics, approximately 30% of the population (about 2.16 million) lives in public flats at the second quarter of 2022 (Housing Bureau, 2022). In contrast, 80% of housing in Singapore was public in 2021 (Singapore Department of Statistics, 2022b).

It can be found that the Hong Kong government does not intervene much actively in the housing market, resulting in the market being dominated by private real estate. In contrast, the Singapore government has a stronger intervention and plays a more vital role in the market. In order to compare the housing policies more systematically, the following is an analysis of the service providers, financing sources, and policy and eligibility-related regulations of the elderly housing policies in both places.

7.1 Service Providers and Financing Sources

Hong Kong's public housing services are provided by the public sector, and are funded by the government through free land grants, funding and low-interest loans, and by the HKHA through the leasing of public housing and commercial properties owned by the HKHA and the sale of some of its residential housing (Lau & Murie, 2017; LiquiSearch, 2022). The other part is that HKHA leases out public housing and commercial properties it owns, and sells some of its residential housing to finance the construction and maintenance of public housing (Bryan Cave Leighton Paisner [BCLP], 2022). In addition, the Hong Kong government aims to achieve a coordinated operation of the public housing program in Hong Kong through policy measures such as lowering the interest rate on loans to the elderly of different incomes and providing housing monetization subsidies (Sun, 2022; Press Releases, 2017). At the same time, the Hong Kong government also provides subsidies for loan interest, tax reductions for home purchases, and extensions of loan terms (HKWJ Tax Law & Partners Limited, 2021).

7.2 Policies and Qualifications

Despite a similar financial and regulatory framework for public housing management, it should be noted that there are differences between Hong Kong and Singapore in terms of policy provisions. In Hong Kong, the average subsidized funding for public rental housing is HK\$1,700 (US\$220), which is given to tenants through indirect subsidies, which is less than one-fifth of the average household income in 2015 (Office of Policy Development and Research [PD&R], 2017; GlobalData, 2022). In Singapore, the government provides a CPF for citizens to purchase housing at a lower price, which may result in a more favorable mortgage rate from the Housing Authority and a subsidy of at least S\$20,000 for first-time buyers (HDB, 2022b). After repayment of the loan or purchase of public housing, home ownership is granted to the individuals and becomes an asset of the purchaser. According to HKHA 2015 and HDB 2015, Hong Kong and Singapore public housing have similar eligibility thresholds for purchasing and owning

public housing (Zhang, Zhang & Zheng, 2020), such as age limits, citizenship requirements, and income ceilings (Chan, 2015). However, the two policies impose different restrictions and requirements on the applicant for public housing. Hong Kong has stringent income and net worth limits, and the Hong Kong government wants to allocate its limited housing resources to people who are in genuine need (HKHA, 2022c; Li & Shamsuddin, 2022). In Singapore, the income limit for first-time buyers is set at S\$6,000 for three-bedroom public housing in non-established estates and S\$12,000 for three-bedroom apartments and four-bedrooms or more in established estates, while there is no limit for purchasing second-hand rental properties. With covering a wider range of income levels, it is more relaxed than that in Hong Kong (Finder, 2020).

8. Insights from the Success of Singapore's Public Housing Policy

Similar to Hong Kong, Singapore's public housing program for the elderly provides lower-cost rental units (Joo & Wong, 2008). However, in the early 1960s, the severe housing shortage was alleviated, and public housing programs began to shift rapidly toward homeownership. Since 1964, there has been an increasing emphasis on housing quality and homeownership. After the 1970s, the demand for homeownership by Singapore residents far exceeded the demand for rental housing (Anacker, 2019). Several factors have contributed to Singapore's achievements in providing public housing for the elderly, including policy, legal, and institutional safeguards.

8.1 Government Guarantee

More than just a social welfare program, Singapore's public housing scheme for the elderly aims to improve the overall standard of living of the elderly as part of the People's Action Party (PAP) government's strategic objective of seeking to create and maintain social stability. The solid political support and commitment in Singapore are essential factors for the Housing & Development Board (HDB) to effectively implement and manage housing issues (HDB, 2021b). The local government has fully

supported HDB to facilitate the implementation of the Senior Citizen Housing Program. HDB is locally responsible for the planning, construction and managing of all public housing and some related community facilities. The organization consists of various departments, such as administration, finance, development, construction, real estate, and land allocation, as shown in the organization chart (Figure 2) below. Having many highly qualified employees, the HDB operates quite effectively and is well-managed to maintain a relatively large local housing stock.



Figure 2: Organization Structure of Housing & Development Board of Singapore

(HDB, 2022c)

From the successful experience of policy housing in Singapore, it is clear that the government is a major player in policy housing retirement and a critical factor in its

success. It is well known that Singapore owns 80% of policy housing and its housing allocation is mainly achieved through government-led, and the Singapore government is a strong guarantor for the realization of the HDB scheme (Beyer, 2021). Therefore, to realize the policy housing pension scheme, the involvement of the Singapore government is essential. From the initial experience of housing pensions, it is clear that the higher risk is why Singapore residents refuse to participate in them. In the subsequent policy housing pension model, the government is involved and residents can participate in the policy housing pension with lower risk. With the government's protection, residents would not worry about adverse events like cheating. With fewer worries, residents are bound to participate in policy housing pensions and promote its development actively.

8.2 Legal Security

Although the Singapore government is involved in policy housing pensions throughout, its housing pensions are not arbitrarily led by the government, but based on strong laws and regulations. The law is a necessary and important guarantee that a country can function properly, and people would be able to act in accordance with the law. Similarly, when carrying out the policy housing pension model, laws and regulations should be the main guiding principle, and people should carry out the activities of housing pension in a fair, just and open manner. Thus, it is clear that sound laws guarantee the smooth implementation of the policy-based senior housing scheme, and it is important to establish and improve the relevant laws and regulations before implementing the policy-based senior housing scheme. Another factor contributing to the development of Singapore's elderly housing program is the effective implementation and enforcement of the mandatory land acquisition policy. Singapore enacted a land acquisition policy to limit land speculation, making large-scale public housing development possible (Shatkin, 2016).

8.3 Institutional Security

The Central Provident Fund (CPF) system is a well-known savings system in Singapore that has played an integral role in its development of Singapore (Mwoka, et al., 2021; Ministry of Manpower [MoM], 2022). The CPF system has not only played a vital role in the construction of HDB flats, solving part of the problem of financing the construction of HDB flats, but it also plays a vital role in housing retirement. The CPF system is a powerful guarantee for the implementation of the policy-based housing pension model, which is related to HDB flats and is also a form of housing pension, and can provide a certain amount of financial support for the policy-based housing pension (CPFEB, 2022b). The CPF system solves the housing problem of the residents when they are young and the retirement problem when they are old, and is an indispensable backing to improve the social security system. A mature CPF system can reduce residents' worries and assist in the smooth implementation of policy-based housing pensions.

9. Conclusion

At present, housing retirement in Hong Kong and Singapore is still being explored and improved, but a variety of policy-based housing retirement models, to a certain extent have solved the retirement problems of Hong Kong and Singapore residents, and provided some reference experience for other countries to open up policy-based housing retirement approaches. By comparing Hong Kong and Singapore's elderly public housing programs, this report finds that Singapore's housing policy is largely state-led, with the government meeting the elderly housing needs of its citizens; while in Hong Kong, housing policy is largely dependent on the fluctuations of its residential real estate market. According to current statistics, Hong Kong has less government intervention, a relatively small share of public housing, and a small share of elderly housing. The comparison can reveal that Singapore provides a more comprehensive public housing scheme for elderly residents through government, legal and institutional

safeguards.

However, it is acknowledged that while the Singapore model certainly has merits, its applicability to a mature and developed market like Hong Kong is limited in terms of the public housing model for the elderly. This report has limitations in that it only analyzes the target population, relevant institutions and policies, and does not provide a more systematic comparison and study from multiple perspectives. Future research can analyze the differences between the two policies more from a social work and a theoretical perspective to gain more insights.

In conclusion, the Hong Kong government can learn from Singapore's experience in the implementation of its elderly public housing policy and make good use of resources for smoother operation of public housing by handling land supply issues flexibly and using large areas of land for public housing construction.

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