**Country Policy and Information Note**

Vietnam: Fear of illegal moneylenders

Version 1.0

December 2018

Preface

**Purpose**

This note provides country of origin information (COI) and analysis of COI for use by Home Office decision makers handling particular types of protection and human rights claims (as set out in [the basis of claim](#_Basis_of_claim) section). It is not intended to be an exhaustive survey of a particular subject or theme.

It is split into two main sections: (1) analysis and assessment of COI and other evidence; and (2) COI. These are explained in more detail below.

**Assessment**

This section analyses the evidence relevant to this note – i.e. the COI section; refugee/human rights laws and policies; and applicable caselaw – by describing this and its inter-relationships, and provides an assessment on whether, **in general:**

* A person is reasonably likely to face a real risk of persecution or serious harm
* A person is able to obtain protection from the state (or quasi state bodies)
* A person is reasonably able to relocate within a country or territory
* Claims are likely to justify granting asylum, humanitarian protection or other form of leave, and
* If a claim is refused, it is likely or unlikely to be certifiable as ‘clearly unfounded’ under section 94 of the Nationality, Immigration and Asylum Act 2002.

Decision makers **must**, however, still consider all claims on an individual basis, taking into account each case’s specific facts.

**Country of origin information**

The country information in this note has been carefully selected in accordance with the general principles of COI research as set out in the [Common EU [European Union] Guidelines for Processing Country of Origin Information (COI)](http://www.refworld.org/docid/48493f7f2.html), dated April 2008, and the Austrian Centre for Country of Origin and Asylum Research and Documentation’s (ACCORD), [Researching Country Origin Information – Training Manual, 2013](https://www.coi-training.net/content/). Namely, taking into account the COI’s relevance, reliability, accuracy, balance, currency, transparency and traceability.

The structure and content of the country information section follows a [terms of reference](#_Terms_of_Reference) which sets out the general and specific topics relevant to this note.

All information included in the note was published or made publicly available on or before the ‘cut-off’ date(s) in the country information section. Any event taking place or report/article published after these date(s) is not included.

All information is publicly accessible or can be made publicly available, and is from generally reliable sources. Sources and the information they provide are carefully considered before inclusion.

Factors relevant to the assessment of the reliability of sources and information include:

* the motivation, purpose, knowledge and experience of the source
* how the information was obtained, including specific methodologies used
* the currency and detail of information, and
* whether the COI is consistent with and/or corroborated by other sources.

Multiple sourcing is used to ensure that the information is accurate, balanced and corroborated, so that a comprehensive and up-to-date picture at the time of publication is provided of the issues relevant to this note.

Information is compared and contrasted, whenever possible, to provide a range of views and opinions. The inclusion of a source, however, is not an endorsement of it or any view(s) expressed.

Each piece of information is referenced in a brief footnote; full details of all sources cited and consulted in compiling the note are listed alphabetically in the [bibliography](#_Bibliography).

Feedback

Our goal is to continuously improve our material. Therefore, if you would like to comment on this note, please email the Country Policy and Information Team.

Independent Advisory Group on Country Information

The [Independent Advisory Group on Country Information](https://www.gov.uk/government/publications/independent-advisory-group-on-country-information-iagci) (IAGCI) was set up in March 2009 by the Independent Chief Inspector of Borders and Immigration to support him in reviewing the efficiency, effectiveness and consistency of approach of COI produced by the Home Office.

The IAGCI welcomes feedback on the Home Office’s COI material. It is not the function of the IAGCI to endorse any Home Office material, procedures or policy. The IAGCI may be contacted at:

**Independent Advisory Group on Country Information**

Independent Chief Inspector of Borders and Immigration

5th Floor

Globe House

89 Eccleston Square

London, SW1V 1PN

Email: chiefinspector@icibi.gov.uk

Information about the IAGCI’s work and a list of the documents which have been reviewed by the IAGCI can be found on the Independent Chief Inspector‘s pages of the [gov.uk website](https://www.gov.uk/government/organisations/independent-chief-inspector-of-borders-and-immigration/about/research#reviews).

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# Assessment

Updated: 19 December 2018

## Introduction

### Basis of claim

* + 1. Fear of persecution or serious harm by illegal moneylenders.

### Points to note

* + 1. Loan shark is a term commonly used to describe a moneylender who charges extremely high rates of interest, typically under illegal conditions. This term is used in many sources quoted within this note.

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## Consideration of issues

### Credibility

* + 1. For further guidance on assessing credibility, see the [Asylum Instruction on Assessing Credibility and Refugee Status](https://www.gov.uk/government/publications/considering-asylum-claims-and-assessing-credibility-instruction).
		2. Decision makers must also check if there has been a previous application for a UK visa or another form of leave. Asylum applications matched to visas should be investigated prior to the asylum interview (see the [Asylum Instruction on Visa Matches, Asylum Claims from UK Visa Applicants](https://www.gov.uk/government/publications/visa-matches-handling-asylum-claims-from-uk-visa-applicants-instruction)).
		3. Decision makers should also consider the need to conduct language analysis testing (see the [Asylum Instruction on Language Analysis](https://www.gov.uk/government/publications/language-analysis-instruction)).

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### Convention reason

* + 1. People who fear illegal moneylenders are not considered to form a particular social group (PSG) within the meaning of the 1951 UN Refugee Convention. This is because they do not possess a common immutable/innate characteristic that cannot be changed or a characteristic that is so fundamental to human identity that they should not be required to change it.
		2. In the absence of a link to one of the 5 Convention grounds necessary for the grant of refugee status, the question to be addressed in each case will be whether the particular person will face a real risk of serious harm sufficient to qualify for Humanitarian Protection (HP).
		3. For guidance on Humanitarian Protection see the [Asylum Instruction on Humanitarian Protection](https://www.gov.uk/government/publications/humanitarian-protection-instruction).
		4. For further guidance on Convention reasons and particular social groups, see the [Asylum Instruction on Assessing Credibility and Refugee Status](https://www.gov.uk/government/publications/considering-asylum-claims-and-assessing-credibility-instruction).

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### Exclusion

* + 1. Decision makers must consider whether one (or more) of the exclusion clauses is applicable. Each case must nevertheless be considered on its individual facts and merits.
		2. For further guidance on the exclusion clauses and restricted leave, see the [Asylum Instruction on Exclusion: Article 1F of the Refugee Convention](https://www.gov.uk/government/publications/asylum-instruction-exclusion-article-1f-of-the-refugee-convention) and the [Asylum Instruction on Restricted Leave](https://www.gov.uk/government/publications/restricted-leave-asylum-casework-instruction).

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**Do not print or disclose the contents of this section**

* + 1. Decision makers must consider referring cases to the Special Cases Unit.
		2. For more information see: [What is a Special Cases Unit Case?](http://horizon.gws.gsi.gov.uk/portal/site/horizon-intranet/menuitem.5e9fdfa5b28a104a43757f10466b8a0c/?vgnextoid=07270f433821c210VgnVCM1000002bb1a8c0RCRD), the [Special Cases Screening Aid](http://horizon.gws.gsi.gov.uk/portal/site/horizon-intranet/menuitem.5e9fdfa5b28a104a43757f10466b8a0c/?vgnextoid=eb0c2f65586a6310VgnVCM1000002bb1a8c0RCRD) (noting, in particular, the country specific profiles); and [Referral of Article 1F Exclusion Cases to Special Cases Unit](http://horizon.gws.gsi.gov.uk/portal/site/horizon-intranet/menuitem.5e9fdfa5b28a104a43757f10466b8a0c/?vgnextoid=0a3933a6e2c4b310VgnVCM2000003cb1a8c0RCRD).

**End of non-disclosable section**

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### Risk

* + 1. Only the State Bank of Vietnam and official state-approved credit institutions are licensed to conduct banking operations in Vietnam and the Civil Code makes lending money for high interest illegal. Interest rates must not exceed 150% of the base rate (see [Legal position](#Legal_position)).
		2. Illegal moneylending is, nevertheless, a widespread problem in Vietnam owing to the complicated nature of borrowing money from banks. People can borrow money from illegal moneylenders with very little collateral and sometimes without providing any personal information or guarantee other than their signature. Interest rates are not usually written on loan papers making it hard for people to keep track of how much they owe and difficult to prove the loan or interest rate as it is not documented. Interest rates are often extortionate and the loanee can be required to repay many times the value of the money they initially borrowed (see [Nature of money lending](#_Nature_of_money)).
		3. Where people find themselves unable to repay loans they can be subject to harassment, kidnapping, assaults or forced to sell their houses/assets to pay for the debt (see [Nature of money lending/loan sharking](#Nature_of_money2)).
		4. There are reports of people (including children) being trafficked and forced into labour, sex work, following non-repayment of loans by themselves or their families (see [Repercussions of non-payment](#_Repercussions_of_non-payment)).
		5. Where people have been threatened with serious harm, decision makers must establish whether the moneylender’s behaviour poses a real and serious threat to the person. However, in most cases it is unlikely to reach the high threshold necessary to qualify for humanitarian protection. Decision makers must consider each case on its facts.
		6. Where there are indicators of trafficking please refer to the country policy and information note on [Vietnam: Trafficking](https://www.gov.uk/government/publications/vietnam-country-policy-and-information-notes).
		7. For further guidance on assessing risk, see the [Asylum Instruction on Assessing Credibility and Refugee Status](https://www.gov.uk/government/publications/considering-asylum-claims-and-assessing-credibility-instruction).

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### Protection

* + 1. Where the person fears persecution and/or serious harm from non-state actors, decision makers must assess whether the state can provide effective protection.
		2. The Vietnamese authorities are trying to crack down on illegal moneylending with some provinces setting up special police units to address the problem. Police have increased investigations into alleged loan sharks and some areas are also trying to increase public awareness of the risks to deter people from taking out illegal loans (see [Action to combat loan sharking](#Action_to_combat)).
		3. Whilst provisions are in place to police illegal money lending, apprehending and convicting moneylenders is difficult as the high interest rates charged are not normally written on loan papers making it difficult to prove a violation had occurred (see [Action to combat loan sharking](#Action_to_combat1), [Avenues of redress](#Avenues_of_redress)).
		4. The state appears both willing and able to offer effective protection. However, there are reports of corruption amongst the police with impunity remaining a problem. A person’s reluctance to seek protection does not necessarily mean that effective protection is not available. Decision makers must consider each case on its facts. The onus is on the person to demonstrate why they would not be able to seek and obtain state protection.
		5. For further guidance on assessing the availability or not of state protection, see the [Asylum Instruction on Assessing Credibility and Refugee Status](https://www.gov.uk/government/publications/considering-asylum-claims-and-assessing-credibility-instruction).

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### Internal relocation

* + 1. Vietnam is a large country of over 96 million people with several large cities, 6 of which having a population of over a million. The law allows for freedom of internal movement which is common. Local police require citizens to register when staying overnight in any location outside of their local area and the government appears to enforce these requirements more strictly in some Central and Northern Highlands districts than elsewhere. Those who moved without permission were sometimes hampered from seeking legal residence permits, public education, and health-care benefits (see [Freedom of movement](#Freedom_of_movement)).
		2. Victims of illegal moneylenders will, in general, be able to internally relocate to escape a localised threat from moneylenders but this will depend on the person’s circumstances and the nature of the threat. Decision makers must consider each case on its facts. The onus is on the person to demonstrate why they would not be able to relocate.
		3. For further guidance on internal relocation, see the [Asylum Instruction on Assessing Credibility and Refugee Status](https://www.gov.uk/government/publications/considering-asylum-claims-and-assessing-credibility-instruction).

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### Certification

* + 1. Where a claim is refused, it is unlikely to be certifiable as ‘clearly unfounded’ under section 94 of the Nationality, Immigration and Asylum Act 2002.
		2. For further guidance on certification, see [Certification of Protection and Human Rights claims under section 94 of the Nationality, Immigration and Asylum Act 2002 (clearly unfounded claims)](https://www.gov.uk/government/publications/non-suspensive-appeals-certification-under-section-94-of-the-nia-act-2002-process)

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#

# Country information

Section 3 updated: 10 December 2018

## Legal position

### Laws on loans/pawnbrokers

* + 1. The law on credit institutions states:

‘Article 12.- Types of credit institutions

1. The Vietnamese credit institutions include: State credit institutions, joint stock credit institutions of the State and the people, and cooperative credit organizations.

2. Depending on the demands of the country's socio-economic development, the State shall allow the establishment of joint-venture credit institutions, non-bank credit institutions with 100% foreign capital in Vietnam; permit foreign banks to open their branches in Vietnam.

Foreign credit institutions may open their representative offices in Vietnam. Such representative offices shall not be allowed to conduct business operations in Vietnam.

‘Article 14. Right to conduct banking operations

1. Organizations that fully meet the conditions under this Law and other relevant laws and are licensed by the State Bank may conduct one or some banking operations in Vietnam.

2. Individuals and organizations other than credit institutions are prohibited from conducting banking operations, except escrow, purchase and sale of securities by securities companies.

‘Article 51.- Credit contracts

The lending must be established in a credit contract. The credit contract must contain the lending conditions, the loan use purpose, the form of loan, the loan amount, the interest rate, the loan duration, the security form, the value of the property as security, the mode of debt repayment and other commitments agreed upon by the involved parties.’[[1]](#footnote-2)

* + 1. The criminal code of Vietnam states:

‘Article 201. Usury in civil transactions

1. Any person who offers loans at an interest rate that is five times higher than the maximum interest rate specified in the Civil Code and earns an illegal profit of from VND 30,000,000 to under VND 100,000,000 or previously incurred a civil penalty or has a previous conviction for the same offence which has not been expunged shall be liable to a fine of from VND 50,000,000 to VND 200,000,000 or face a penalty of up to 03 years' community sentence.’[[2]](#footnote-3)

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Section 4 updated: 10 December 2018

## Nature of moneylending

### Loan sharks/gangs and black credit

* + 1. Illegal moneylenders are widespread in Vietnam with many poor people accessing money in this way due to the complicated nature of borrowing money from banks[[3]](#footnote-4). Illegal moneylenders provide easy access to their operations by using online websites offering quick and easy loan services, they also distributed leaflets in public areas[[4]](#footnote-5) [[5]](#footnote-6) .
		2. People are able to borrow money by providing little or no personal information. Some loan sharks offer loans with iCloud accounts as collateral, and when the debtor is unable to pay, the lender locks their iCloud account rending their iPhones unusable. Loans offered on these terms are limited to equal or lesser value of the debtor’s phone[[6]](#footnote-7). Some lenders are willing to loan with just the guarantee of an acquittance or with only the borrower’s signature[[7]](#footnote-8) [[8]](#footnote-9). Loans with agreed high interest rates without collateral and agreed with just the borrower’s signature were referred to as “black credit”[[9]](#footnote-10).
		3. According to a 2016 article in [online newspaper] VietNamNet ‘black credit is easy to get but difficult to pay because the borrowers are usually not interested in the conditions for the loans, don’t read well and [don’t] understand all the terms specified in the loan papers and the lenders don’t use a percentage in calculating the interest money but only specific numbers. Therefore, the borrowers don’t know the interest rates they must pay.’[[10]](#footnote-11)
		4. Where people can access legal loans Vietnamese law states that the interest rate must be agreed upon by both parties and must not exceed 150% of the base rate set by the State Bank of Vietnam[[11]](#footnote-12). According to sources the average annual interest rate offered on illegal loans is around 180% but can be as much as 255% (or 300%)[[12]](#footnote-13). Rates can vary depending on whether the lender is able to use collateral such as houses or cars or whether they rely on personal papers or guarantees through acquittances[[13]](#footnote-14) [[14]](#footnote-15).
		5. In order to evade the law some moneylenders registered as a pawnshop but operated as an illegal money lender[[15]](#footnote-16).
		6. According to an article in Tuoi Tre Online from 2016 ‘A large number of Ho Chi Minh City pawnshops have been labelled “backyards” for criminal activity because of the number of irregularities in their business operations. There are over 2,500 pawnshops in the southern metropolis, with many alleged to have facilitated criminal activity. According to police officers, such venues are often the workplace of local loan sharks and used to quickly offload stolen goods.’[[16]](#footnote-17)
		7. An article in Voice of Vietnam, which interviewed Truong Thanh Duc, a local lawyer, stated that:

‘Current regulations allow pawnshops to receive only goods as collateral while prohibiting the use of IDs and household books, Duc elaborated. If the borrowers fail to pay up, pawnshop owners can sell the items to recoup their money. They are strictly prohibited from threatening or forcing the borrowers to pay the money in any way, the legal practitioner explained. Credit institutions can only charge maximum interest rates of 30% a year, as per the Civil Code, Duc added. Meanwhile, many loan sites offer interest rates of up to 300% a year.’[[17]](#footnote-18)

* + 1. According to a Viet Nam News article from 2015 ‘Senior lieutenant-colonel Tran Thi Thuy, from the Police General Department, said that lending money for high interest was illegal. He said it had led to hundreds of bankruptcies and the loss of thousands of billions of dong. The bankruptcies were also associated robberies by desperate business people. This had led to 41 murders and 588 robberies from 2010 to 2014.’[[18]](#footnote-19)

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### Peer-to-peer money lending (P2P)

* + 1. Peer-to-peer lending (also referred to as P2P) is an online system of borrowing money where individual borrowers or businesses are matched to lenders. Lending amounts tend to be small and for short periods of time usually between one month and two years[[19]](#footnote-20). Lenders and borrowers connect via apps and due to the ease of accessing loans in this way P2P lending has been growing in popularity in Vietnam with estimates that nearly 100 lenders have started operating in the last few years[[20]](#footnote-21) [[21]](#footnote-22). For many experts, in Vietnam P2P could replace illegal moneylenders charging extortionate rates. But they said there is still no legal framework for the business model and P2P is still outlawed.[[22]](#footnote-23) Companies involved in P2P usually register as investment consultancy firms and avoid having any control exerted by the State bank of Vietnam by acting as intermediaries- connecting lenders and borrowers but not getting involved in the keeping of or trading of money[[23]](#footnote-24) [[24]](#footnote-25) .
		2. According to an article in Voice of Vietnam ‘Economists are cautious about P2P, especially after China’s recent statement on eliminating 157 online lending companies and keeping only one state-owned company. The interest rates quoted by the companies were around 10% per annum, but real interest rates were 40%. In Vietnam, interest rates applied by some online lending institutions are up to 50-70% per annum.’[[25]](#footnote-26)
		3. An article in Vietnam Net noted that borrowers were ‘warned that if he cannot pay debts, the lenders will be able to take necessary measures to collect debts – making public about the debt, selling the debt to third parties or suing before the civil court.’[[26]](#footnote-27)

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### Prevalence

* + 1. CPIT was able to find country information on the number of moneylenders operating in the country or the number of people affected by illegal loans. Vietnam Net reported in 2016 that police statistics from 2010-2015 recorded more than 4,900 cases related to black credit[[27]](#footnote-28).
		2. Viet Nam news noted in a report from 2016 that ‘Agricultural credit policy in rural areas of Việt Nam is inadequate so that 86 per cent of ethnic minority farmers in the Tây Nguyên (Central Highlands) region are borrowing “black” credit to develop production.’[[28]](#footnote-29)

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### Repercussions of non-payment

* + 1. Those who could not repay their loan with interest face the risk of incurring heavy debts and other repercussions such as harassment[[29]](#footnote-30), beatings, threats to family members[[30]](#footnote-31), direct threats, assault, kidnapping and being forced to sell their houses and assets to repay the debt[[31]](#footnote-32) [[32]](#footnote-33).
		2. Asia Times noted in October 2018 that ‘The social impact of black market gambling is immeasurable, though local media often report on the barbaric tactics employed by loan sharks and gambling syndicates to collect payments from punters.’[[33]](#footnote-34)
		3. A journal article by the Public Library of Science (PLoS) noted that: ’Household debt can push people to accept extortionate job placement or employment terms and conditions—and, conversely, people may take out loans at difficult repayment rates to fund their migration’.[[34]](#footnote-35)
		4. The Independent Anti-Slavery Commissioner issued a report in 2017 examining modern slavery experienced by Vietnamese national en route to and within the UK. Based on 75 National Referral Mechanism (NRM) files, the report concluded that the main reason for movement amongst both adults and children was ‘financial difficulty or needing to pay off a family member’s debts’.[[35]](#footnote-36)
		5. There are reports of people (including children) being trafficked and forced into labour, sex work, following non-repayment of loans by their families. For example, the Guardian reported on a 20-year-old Vietnamese victim of trafficking who worked from the age of six to pay off her dead parents’ debts from a loan shark. She was repeatedly beaten with sticks, broken bottles and burned with cigarettes before being trafficked to the UK[[36]](#footnote-37).
		6. A Jesuit Refugee Service report examined Vietnamese trafficking victims’ experiences. The report cited an example of one man who was unable to repay his debt to loan sharks. He was subsequently sold into slavery and trafficked into China and then, after a few years, into Russia. He was forced to work in severely poor conditions with no salary and was routinely beaten. After some years, he was forced to come into the UK by boarding a lorry under threat of death.[[37]](#footnote-38)
		7. CNN also reported on Vietnamese children working in child brothels in Cambodia whose parents had fallen victim to loan sharks[[38]](#footnote-39).
		8. CPIT could find no further information within the sources searched on the repercussions faced by those unable to repay their loans.

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Section 5 updated: 10 December 2018

## Police

### General effectiveness

* + 1. The Australian Government’s Department for Foreign Affairs and Trade’s (DFAT) ‘Country Report for 2017’ (the 2017 DFAT Report) stated that ‘Internal security is the responsibility of the Ministry of Public Security, although the military maintains public order in the event of civil unrest in some remote areas. Police organisations exist at the national, provincial, district and local levels, and are subject to the authority of people’s committees at each level. The police are generally effective at maintaining public order.’[[39]](#footnote-40)
		2. The 2018 US State Department’s report, covering events in 2017 (the 2017 USSD report) stated that:

‘People’s committees (the executive branch of local governments) had substantial authority over police forces and prosecutors at the provincial, district, and local levels. Although the Supreme People’s Procuracy had authority to investigate security force abuse, police organizations operated with significant discretion, little transparency, and limited public oversight. Police officers sometimes acted with impunity. At the commune level, guard forces composed of residents or members of government-affiliated social organizations commonly assisted police and sometimes committed human rights abuses. Police were generally effective at maintaining public order, but other police capabilities, especially investigative, were very limited.’[[40]](#footnote-41)

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### Action to combat illegal money lending

* + 1. In a 2015 Viet Nam News article Tran Thi Hong Hanh, general secretary of the Viet Nam Banking Association, said that ‘catching illegal lenders was difficult, so the better measure was prevention. […] Hanh said that the Civil Code banned lending money for high interest, but did not regulate punishment for it, whereas the Penal Code stated that the highest sentence for violations was three years.’[[41]](#footnote-42)
		2. In a 2016 Viet Nam News article about illegal money lending Lieutenant General Lê Đông Phong, director of Ho Chi Minh (HCM) City Police Department said that:

‘During the past ten months, police discovered more than 2,840 criminal offences, deterred 1,906 gangs and arrested over 6,900 criminals. Phong said most gangs in the city ran pawn services as fronts, but were also involved in loan sharking and illegal gambling. […] Phong said city police made a list of local gangs and measures to fight them. Riot police forces were mobilised to patrol key areas to prevent and combat crime. Sudden inspections on entertainment services such as bars, discotheques and pawn shops have been implemented, he added.’[[42]](#footnote-43)

* + 1. Viet Nam News, reported in August 2018 that:

‘Police in southern Bình Thuận Province have set up a special police unit to crack down on illegal loan sharks, which have reportedly been increasing their activities with many sophisticated tricks that ensnare locals in never-ending debt traps. Nguyễn Ngọc Hai, chairman of the provincial People’s Committee, said the committee has asked the city, districts and communes to strengthen prevention and fight usury interest crime as proposed by the province’s police force. Previously, the provincial police had sent documents to the committee to warn about loan sharks in the province.

‘[…] To proactively prevent and strictly handle this type of crime, the provincial police have asked the provincial People’s Committee to inform local people about the tricks of loan shark groups.’[[43]](#footnote-44)

* + 1. Asia Times noted in October 2018 that ‘The police also reportedly increased investigations into alleged loan sharks. At least a dozen illegal football betting rings were busted during or after the international competition, some of which had built betting books worth millions of dollars.’[[44]](#footnote-45)

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### Corruption

* + 1. The 2017 USSD report noted:

‘Although the law provides criminal penalties for corruption by officials, the government did not implement the law effectively, and officials often engaged in corrupt practices with impunity. The number of arrests and prosecutions of high-ranking officials for corruption increased during the year […]. Corruption among police remained a significant problem at all levels, and police sometimes acted with impunity. Internal police oversight structures existed but were subject to political influence.’[[45]](#footnote-46)

* + 1. With regards to trafficking enforcement laws, the US State Department Trafficking in Persons 2018 report noted ‘Some complicit officials, primarily at commune and village levels, reportedly accepted bribes from traffickers, overlooked trafficking indicators, and extorted profit in exchange for reuniting victims with their families. The government did not report any investigations, prosecutions, or convictions of officials complicit in trafficking offenses despite these trends.’[[46]](#footnote-47)

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### Avenues of redress

* + 1. CPIT could find no information within the sources searched on the avenues of redress available to victims of moneylenders (see [Bibliography](#Bibliography_1)).
		2. One source did note that it was difficult to hold moneylenders accountable as high interest rates are not usually written on loan papers making it hard to prove that any violation had occurred[[47]](#footnote-48).

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Section 6 updated: 10 December 2018

## Freedom of movement

### Ability to relocate

* + 1. Vietnam has a total land area of 310,070 sq km and a population of over 97 million[[48]](#footnote-49). There are several large cities where the population is over 1 million[[49]](#footnote-50).
		2. The 2017 DFAT Report noted that:

‘Internal relocation is common, with large scale urbanisation occurring in recent decades alongside other migration for economic purposes. […] Police require citizens and foreigners to register when staying overnight in a location outside of their own homes. This is enforced more strictly in some areas, such as Central and Northern Highlands districts. Moving without formal approval from the authorities can restrict access to legal residence permits, public education and healthcare benefits. The strong and effective Vietnamese public security network means that there are few options for internal relocation to seek protection from state authorities.’[[50]](#footnote-51)

* + 1. The 2017 USSD report stated that:

‘The constitution provides for freedom of internal movement, foreign travel, emigration, and repatriation, but the government imposed some limits on the movement of certain individuals, especially those convicted under national security or related charges or those outspoken in their criticism of the government.

‘Local police required citizens to register when staying overnight in any location outside of their own homes; the government appeared to enforce these requirements more strictly in some Central and Northern Highlands districts.

‘In general, authorities did not strictly enforce residency laws, and migration from rural areas to cities continued unabated. Moving without permission, however, hampered persons from seeking legal residence permits, public education, and health-care benefits.’[[51]](#footnote-52)

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### Hukou registration

* + 1. The 2017 DFAT Report stated that:

‘Ho Khau registration is initially obtained through the registration of a person’s birth with the village or provincial administrators. Officials use the registration system to determine the levels of services provided to villages and provinces, linking a person’s right to access government healthcare, education and other services to their place of residence. Ho Khau registration is also essential for obtaining employment with the government or in state-owned enterprises. Although health care facilities can be accessed anywhere in Vietnam in emergency cases, public facilities may turn away non-life-threatening cases where the person is not properly registered. Access to schools is determined by Ho Khau registration and administration fees may apply to children not registered in an area zoned for a particular school. For members of minority groups, Ho Khau registration is essential to access development-related entitlements in rural and regional centres. This may include additional language training or employment related training.’[[52]](#footnote-53)

* + 1. On 25 January 2018 the Vietnam Law and Legal Reform Magazine reported that the Ho Khau is set to be scrapped in 2020 and ‘Vietnamese citizens will be managed solely through their identification numbers on a new online national database’. The report went on to note that:

‘Under Government Resolution No. 112/NQ-CP issued on October 30 [2017], Vietnamese citizens will be managed solely through their identification numbers on a new online national database. Personal transactions will be performed only through the national identification (NI) number and all changes of personal information will be updated on the national database and recorded in each person’s NI number.

‘With the abolishment of the household registration book, many time-consuming administrative procedures will be scrapped, including formalities to change persons named in the book, obtain a new book when moving houses, deregister permanent residence or extend temporary residence. The procedures to declare temporary residence to the commune-level police will also be abolished. Papers proving family relationship or birth certificates to register permanent residence for children will not be needed either.’

‘To prepare for this, the Ministry of Public Security is striving to complete gathering personal information of all citizens by early 2019, and by 2020, every citizen is expected to have a new ID card with NI number.’[[53]](#footnote-54)

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# Terms of Reference

A ‘Terms of Reference’ (ToR) is a broad outline of what the CPIN seeks to cover. They form the basis for the [country information section](#Country_information_11). The Home Office’s Country Policy and Information Team uses some standardised ToRs, depending on the subject, and these are then adapted depending on the country concerned.

For this particular CPIN, the following topics were identified prior to drafting as relevant and on which research was undertaken:

* Legal position
	+ Laws on loan sharking/money lenders
* Money lending/loan sharking
* Police
	+ Effectiveness
	+ Corruption
	+ Avenues of redress
	+ Witness protection
* Freedom of movement
	+ Ability to relocate
	+ Hukou registration

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# Version control

Clearance

Below is information on when this note was cleared:

* Version **1.0**
* valid from **19 December 2018**

**OFFICIAL-SENSITIVE – Do not print or disclose the contents of this section**

* this version approved by **Jennifer Bradley, Deputy Director, BICS PSG**
* approved on: **17 December 2018**

**End of non-disclosable section**

Changes from last version of this note

New CPIN on this topic

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