

DIGITAL TRANSFORMATION IN SOCIAL INSURANCE: WHAT SHOULD ENTERPRISES DO UNDER DECREE 164/2025/ND-CP?

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On June 29, 2025, the Government issued Decree 164/2025/ND-CP regulating electronic transactions in the field of social insurance and the national insurance database (**Decree 164**). This Decree marks a significant milestone in the digitalization of the social security system, providing a legal foundation for implementing social insurance procedures through electronic platforms, with the goal of streamlining processes, reducing costs, and enhancing the efficiency of state management in the field of social insurance. Below are some key highlights of Decree 164:

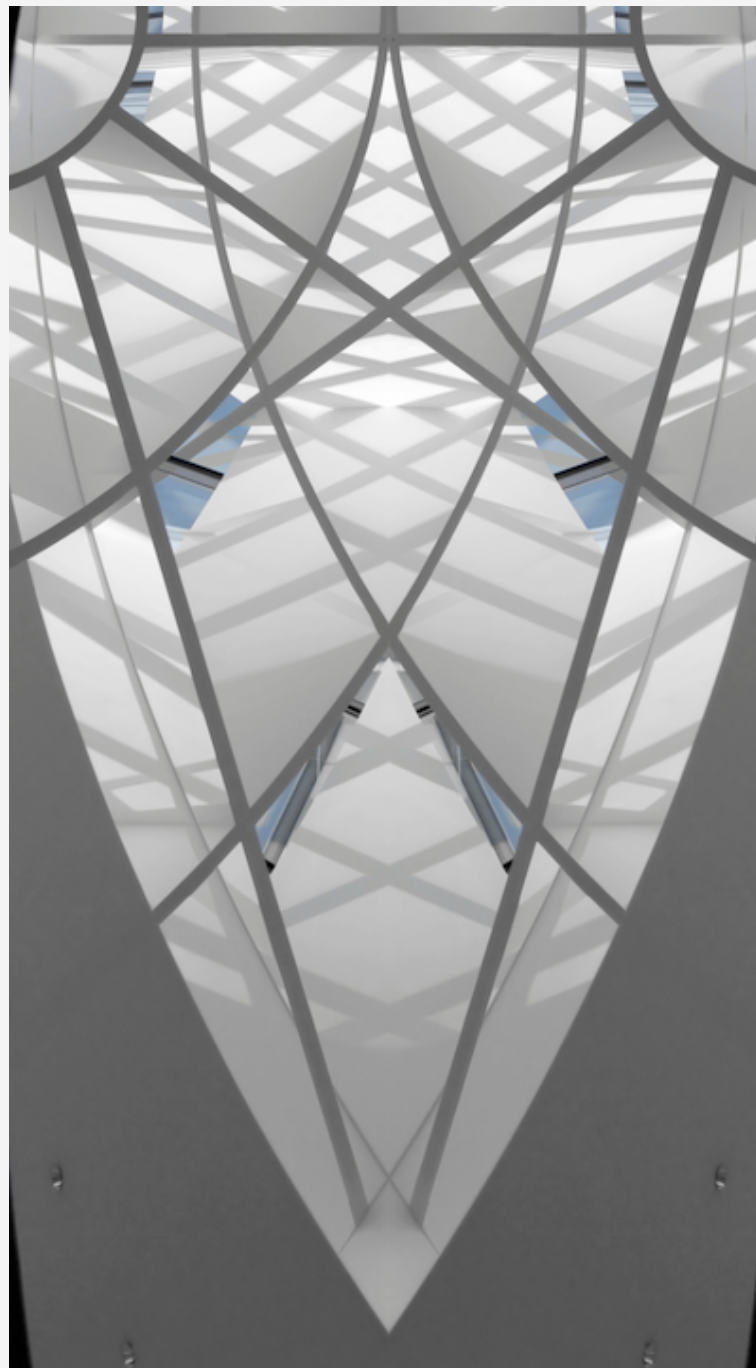
Establishing a consistent legal framework for electronic social insurance transactions

Decree 164 is issued to concretize the provisions of the Law on Social Insurance 2024 while establishing a unified legal framework consistent with available regulations on electronic identification, personal data, cybersecurity, and cyber information security. Accordingly, organizations and individuals conducting electronic transactions in the field of social insurance via the **National Public Service Portal** are required to use a **valid electronic identification account** and a **valid digital signature** (or another form of electronic signature as prescribed by law).

A notable new feature is the principle of reusing integrated data: agencies, organizations, and individuals conducting electronic transactions in the field of social insurance are not required to provide documents or information that are already available and integrated into the National Public Service Portal, national databases, sectoral databases, or digital data repositories of relevant organizations or individuals. This helps minimize the need to resubmit digitized documents, shortens the time required for completing procedures, and reduces administrative costs for enterprises in preparing and submitting social insurance dossiers.

Transitioning to electronic social insurance records and books

Decree 164 stipulates that in cases where an electronic social insurance dossier includes accompanying documents in paper form, agencies, organizations, and individuals conducting electronic transactions in the field of social insurance must convert those documents into electronic format. The conversion of paper-based records and documents into electronic ones - and vice versa -



must comply with the provisions of laws on electronic transactions and data. These electronic social insurance records must be digitally signed and stored in accordance with applicable regulations.

According to Decree 164, electronic social insurance books must be issued no later than January 1, 2026, carrying the same legal validity as paper ones, and being integrated into employees' personal identification accounts. As a result, the retrieval and verification of social insurance participation and benefit information become more transparent, convenient, and timely. Accordingly, an enterprise with multiple branches across the country can submit social insurance records for all employees from its head office by accessing the National Public Service Portal without having to visit every local social insurance agency. The entire process of submission, processing, and result retrieval will be conducted online, 24/7, eliminating the reliance on paper documents.

Establishing new rights and obligations in electronic transactions and mechanisms for handling technical issues

Decree 164 outlines specific rights of enterprises, such as receiving technical support, having transaction data secured, and being provided with data on their employees' social insurance contributions and benefits. At the same time, the Decree also sets forth clear obligations, including managing digital signatures and ensuring the accuracy of digital signature certificates used on electronic social insurance documents; managing electronic identification accounts to ensure cybersecurity and safety; storing both paper and electronic social insurance records; and presenting paper documents upon request by competent authorities for verification.

In the case that the electronic system encounters any failure at the time of submission, enterprises are allowed to temporarily submit paper-based social insurance dossiers, specifically: no later than 3 working days from the deadline for social insurance contribution-related dossiers; and no later than 7 working days for other transactions such as issuance of social insurance books, confirmation of contribution periods, or settlement of benefits. Once the system is restored, enterprises must resubmit the entire dossier in electronic form via the National Public Service Portal. This regulation ensures operational flexibility while maintaining legal strictness and data integrity. Enterprises are required to maintain all corresponding dossiers to ensure the retrieval and verification when needed.

Decree 164 officially takes effect on July 1, 2025. To ensure readiness and avoid operational disruptions, enterprises in need and being eligible for carrying out electronic social insurance transactions should: (i) review and standardize their digital signature systems and electronic identification accounts; (ii) conduct training sessions for HR and accounting departments on the new electronic social insurance procedures; and (iii) develop a plan to fully digitize social insurance records by no later than January 1, 2026.

By understanding and proactively implementing the provisions of Decree 164, enterprises can adapt more effectively to the digitalization of administrative procedures, better manage the performance of their social insurance obligations, and minimize legal risks and operational costs. Should you wish to gain a deeper understanding of the regulations and procedures on Decree 164 and other regulations related to social insurance, kindly contact NHQuang&Associates for legal support and advice.