

PERIODIC HEALTH CHECK-UPS FOR EMPLOYEES: WHAT MUST EMPLOYERS DO, AND WHAT ARE THE PENALTIES?

PENALTIES UNDER DECREE 283/2026 FROM 10 SEPTEMBER 2026

Legal basis: Articles 21 and 27 of the Law on Occupational Safety and Hygiene 2015; Article 33 of Decree 283/2026/NĐ-CP

THE 31 OCTOBER 2026 DEADLINE

Is the 31 October 2026 deadline set by law or by a local authority?

NATIONWIDE LAW

Employers must organize a health check-up for employees at least once a year. The Law does not set a specific deadline date.

Article 21.1, Law on Occupational Safety and Hygiene 2015

OFFICIAL LETTER OF THE HO CHI MINH CITY DEPARTMENT OF HOME AFFAIRS

The Department of Home Affairs requests enterprises and public service units in the city to ensure that 100% of employees receive periodic health check-ups before 31 October 2026. The official letter does not set any penalty.

Official Letter No. 16093/SNV-VLATLĐ dated 17 August 2026

The 31 October 2026 deadline applies to enterprises in Ho Chi Minh City. Other localities may issue their own guidance.

HEALTH CHECK-UP OBLIGATIONS

Who must be examined, how often, and what does the check-up cover?

1 Check-up at least once a year

Employers organize a health check-up for employees at least once a year.

Article 21.1, Law on Occupational Safety and Hygiene

2 Special groups: at least every 6 months

Employees in heavy, hazardous or dangerous occupations or jobs, or especially heavy, hazardous or dangerous ones; employees with disabilities; minor employees; elderly employees.

Article 21.1, Law on Occupational Safety and Hygiene

3 Additional items in periodic check-ups

Female employees must receive an obstetrics and gynecology examination. Employees working in environments exposed to occupational disease risk factors must be examined for occupational diseases.

Article 21.2, Law on Occupational Safety and Hygiene

4 Check-ups outside the periodic cycle

Before assigning work; before moving to heavier, more hazardous or more dangerous work; and after recovering from a work accident or occupational disease and returning to work.

Article 21.3, Law on Occupational Safety and Hygiene

Where to be examined, which form applies, and who pays?

5 Qualified medical facility

Health check-ups and occupational disease examinations for employees are conducted at medical facilities that meet professional and technical requirements and conditions.

Article 21.4, Law on Occupational Safety and Hygiene

6 Records under the new form

From 1 July 2026, health check-up records, including periodic ones, for persons aged 18 or older follow the new Form No. 03 of Appendix XXIV. In periodic check-ups, paraclinical tests are performed when prescribed by a doctor.

Articles 34.3 and 36.3.b of Circular 32/2023/TT-BYT, as amended by Article 2 of Circular 25/2026/TT-BYT

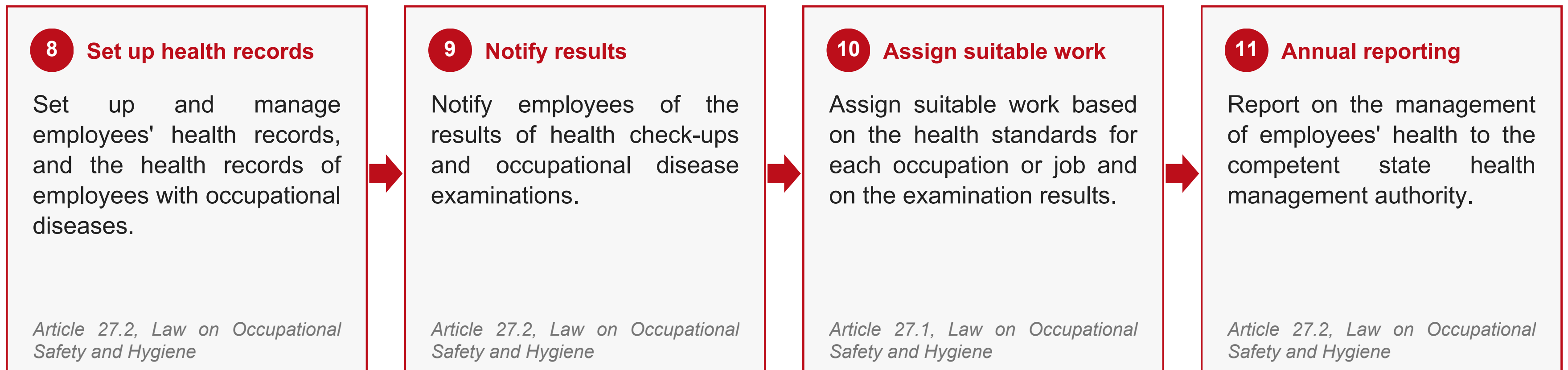
7 Costs paid by the employer

The costs of health check-ups and occupational disease examinations are paid by the employer and are recorded as deductible expenses when determining taxable income under the Law on Corporate Income Tax.

Article 21.6, Law on Occupational Safety and Hygiene

AFTER THE CHECK-UP

What must employers do after the check-up?



SPECIFICALLY IN HO CHI MINH CITY

Official Letter 16093/SNV-VLATLĐ requests enterprises to update employees' check-up results via the link provided by the Department of Health within 03 days after the check-ups are completed.

PENALTIES

What penalty applies if an enterprise does not organize health check-ups?

Violation	Penalty for individuals	Penalty for enterprises (2x)	Legal basis
Failing to organize periodic health check-ups or occupational disease examinations for employees	VND 1 to 3 million per employee	VND 2 to 6 million per employee	Article 33.2, Decree 283/2026/NĐ-CP
Failing to organize a health check-up before moving employees to heavier, more hazardous or more dangerous work, or after they recover from a work accident or occupational disease and return to work	VND 5 to 10 million per employee	VND 10 to 20 million per employee	Article 33.3, Decree 283/2026/NĐ-CP

An enterprise is an organization, so the penalty is 2 times the penalty for individuals (Articles 7.1 and 7.2.b, Decree 283/2026/NĐ-CP).

Remedial measures for the violation in Article 33.2: the employer is required to organize health check-ups and occupational disease examinations for employees; if employees have already paid for their own check-ups, the employer is required to reimburse the costs (Article 33.11.a).

AFTER THE 31 OCTOBER 2026 DEADLINE

If check-ups are not completed by 31 October 2026, what is the basis for handling it?

Law

Article 21.1 requires annual health check-ups and does not set a specific deadline date.

Article 21.1, Law on Occupational Safety and Hygiene

Ho Chi Minh City official letter

Official Letter 16093/SNV-VLATLĐ requests completion before 31 October 2026 and does not set any penalty.

Official Letter No. 16093/SNV-VLATLĐ dated 17 August 2026

Penalty decree

Article 33.2 penalizes failing to organize periodic health check-ups for employees, together with the remedial measure of requiring the check-ups to be organized or the costs to be reimbursed.

Articles 33.2 and 33.11.a, Decree 283/2026/NĐ-CP

Enterprises that have not organized check-ups this year should complete them soon to avoid the risk of penalties.

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