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## Equity in Access to Public Housing: A Comparative Study of Housing Policies in Jakarta and Singapore from an International Law Perspective

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**Abstract:** The rapid urbanization in Southeast Asia has posed significant challenges in providing adequate and affordable housing, particularly for vulnerable urban groups. This article analyzes a comparative study of public housing policies in Jakarta and Singapore from the perspective of international law on the right to adequate and inclusive housing. Using a normative comparative method with a qualitative-descriptive approach, this study examines the effectiveness of each country's housing policy based on Article 25 of the Universal Declaration of Human Rights (UDHR), Article 11 of the International Covenant on Economic, Social, and Cultural Rights (ICESCR), and General Comment No. 4 of the Committee on Economic, Social and Cultural Rights (CESCR). The findings reveal that Singapore, through its Housing and Development Board (HDB), successfully implements an inclusive public housing system with comprehensive subsidies and without discrimination based on marital status or employment type. Conversely, public housing policies in Jakarta remain exclusive due to strict administrative requirements that limit access for single individuals and informal workers. This article recommends reforming Jakarta's public housing policies by relaxing discriminatory requirements and establishing a national public housing authority to ensure fair, inclusive, and internationally compliant housing access for all citizens.

**Keyword:** Housing Justice, International Law, Public Housing, Inclusivity, Singapore, Jakarta, Abstracts Written in Bahasa and English.

### INTRODUCTION

Amidst the rapid pace of urbanization and various global crises, access to adequate housing has become an increasingly pressing issue. Rapid urbanization, especially in developing countries, has triggered significant urban population growth. According to a United Nations (UN) report, it is estimated that by 2050, about 68% of the world's population will live in urban areas, compared with only 30% in the mid-20th century. This rapid urbanization is putting pressure on the availability of housing, infrastructure, and basic services such as water, electricity, and transportation. Large cities in developing countries are experiencing very rapid urbanization, often without adequate urban planning. This phenomenon is fueling the growth

of slums, which are often located on the outskirts of the city, far from access to public services and jobs. The country- developing countries, especially in Asia, Africa, and Latin America, face major challenges in providing adequate housing for their citizens. In Africa, for example, urban areas in Lagos (Nigeria), Kinshasa (Democratic Republic of Congo), and Nairobi (Kenya) have experienced significant population increases but housing availability is extremely limited. In Lagos, nearly 70% of the city's population lives in slums without adequate access to clean water, sanitation, or electricity. This situation is similar to that in large cities in India, such as Mumbai and Delhi, where informal housing is a solution for millions of people who cannot afford to buy a house. Even though developed countries have infrastructure which more good, they Also No let go from crisis residence. For example, in the United States, cities like San Francisco, Los Angeles, and New York are facing steep increases in house prices, making housing unaffordable for many residents. In Europe, cities like London, Paris, and Berlin are also facing similar challenges. The housing crisis in these countries proceed often caused by request which exceed supply, property speculation, and increasing income inequality. On the other hand, high urbanization has led to an increase in slums in urban areas as many people migrate to cities in search of economic opportunities and affordable housing. Unplanned urbanization creates pressure on housing resources, forcing many individuals to live in unsuitable environments. This exacerbates social and economic inequalities in big city.

Indonesia, as the fourth most populous country in the world, experiencing the same urbanization fast. According to the data Badan Pusat Statistik (BPS), in 2020, more than 56% of Indonesia's population lives in urban areas, and this figure is expected to increase to more than 66% by 2035. This increase in urban population has a direct impact on the increasing need for housing, especially in big cities such as Jakarta, Surabaya, and Medan. The rate of urbanization to Jakarta shows significant growth, with the population of DKI Jakarta increasing from 8,384,853 in 2000 to 9,963,129 in 2015. This urbanization process is very concentrated on the island of Java, especially in the western part, which drives the growth of surrounding cities such as Bekasi, Depok, and Bogor. Jakarta has become a giant city agglomeration with a very high primacy index, more than three times that of Metropolitan Surabaya. Rapid urbanization has led to an increase in the population in urban areas, which in turn has increased the demand for housing. Without adequate and affordable public housing, low-income residents will be forced to live in slums. Therefore, it is important to build public housing to meet these needs and create a better environment for the community. Many migrants from rural areas do not have sufficient skills or education, so they only can work in the informal sector with low incomes. As a result, they forced to live in unsuitable slums, often on empty land such as riverbanks or railroad tracks. Slum areas themselves cause various negative effects, including increasing levels of poverty, unemployment, and crime in urban areas. In addition, public health conditions in Slums are often poor, with limited access to health services, education, clean water and sanitation.

Slums also spoil the beauty city and create problem social which more wide, like demoralization and emotional instability of citizens. The high number of housing backlogs in Indonesia, especially in big cities, is worsening the condition of slums, because the gap between the need and availability of housing will reach 12.7 million units in 2023, with around 75% in urban areas. The main factors causing this high backlog include rapid population growth and urbanization, limited land and rising land prices which make housing increasingly difficult to access for low-income people. In addition, the imbalance between supply and demand also contributes, where developers focus more on building middle to luxury housing, while the need for affordable housing is less considered. Low purchasing power and high bank interest rates further hamper access to home ownership, causing many families to remain in inadequate environment. To overcome this problem, collaboration between the government and the private sector is needed in providing affordable housing and implementing a balanced housing concept so that low-income people can have a more decent and dignified place to live. The high number

of housing backlogs in Indonesia has a direct impact on the access of Low-Income Communities (MBR) to decent housing. The limited supply of affordable housing, coupled with rising land and property prices, makes many Low Income Communities (MBR) have difficulty obtaining subsidized housing or accessing housing credit. On the other hand, public housing policies are still ineffective in responding to this need, because the government's role in providing affordable housing is still less dominant than the involvement of the private sector, which tends to be profit-oriented rather than equalizing access to housing for all levels of society.

In contrast, Singapore has successfully addressed its housing needs through the Housing and Development Board (HDB), which was established in 1960 and has built about 80% of the country's total housing stock. The HDB's success is supported by the government's complete control over housing planning and distribution, as well as the Central Provident Fund (CPF) scheme that requiring savings for citizens to facilitate home ownership. This approach ensures that all citizens have equal access to housing. In contrast, Indonesia still relies on private developers and bank-based financing schemes, which causes subsidized housing programs to not reach all levels of society effectively. Dependence on private developers and bank financing schemes in Indonesia causes inequality in access housing area public. No all group public own chance the same to obtain decent housing, especially for low-income people (MBR), singles, and informal workers. Public Earning Low (MBR) often face limited subsidized housing and difficulty accessing Home Ownership Credit (KPR) due to strict requirements, while informal workers are constrained by official income documents to obtain housing financing schemes. This inequality not only exacerbates social and economic disparities, but also drives the growth of slum areas in urban areas.

The inequality of access to public housing in Indonesia shows a gap between the community's need for adequate housing and the available housing provision mechanisms. In fact, under international law, the right to adequate housing has been recognized as part of human rights. Universal Declaration of Human Rights (UDHR) Article 25 and the International Covenant on Economic, Social and Cultural Rights (ICESCR) Article 11 affirm that every individual has the right to adequate housing, while UN-Habitat emphasizes that the state has the primary responsibility to ensure equitable access to housing for all its citizens. This study focuses on the comparison of public housing policies in Indonesia and Singapore by assessing their effectiveness and equity of access. The main objectives of this study are to analyze public housing regulations in both countries, and to assess whether the dominant role of the government in Singapore's housing system through the Housing and Development Board (HDB) makes it more effective than the market-based approach applied in Indonesia. In addition, this study will explore the possibility of implementing the HDB model in Indonesia and the challenges that must be faced in its implementation. The results of this study are expected to provide policy recommendations that can improve access to fairer and more inclusive housing in Indonesia, in accordance with the principle of the right to adequate housing as recognized in international law. By comparing housing policies in both countries, this study is expected to provide a deeper understanding of the factors which affects the effectiveness of the public housing system and provides policy recommendations that can improve access to fairer and more inclusive housing in Indonesia. In addition, this study also contributes to the development of housing law studies from an international legal perspective and its application in a national context.

Based on the background described above, this article formulates the following research questions, which will be addressed in the Results and Discussion section:

- a) How effective are the public housing policies in Jakarta and Singapore in ensuring fair and inclusive access to adequate housing for vulnerable groups, particularly low-income communities, single individuals, and informal sector workers, from the perspective of international human rights law?

- b) What forms of exclusion exist within Jakarta's public housing system for single individuals and informal workers, and how do these compare to the more inclusive public housing policies implemented in Singapore?

## METHOD

This study employs a normative juridical method with a comparative approach, aiming to analyze and compare public housing policies in Indonesia and Singapore from the perspective of international human rights law. Primary data consists of national regulations and international legal instruments such as the UDHR, ICESCR, and SDGs, while secondary data includes academic journals, UN-Habitat reports, BPS data, HDB annual reports, and credible media sources. The analysis technique uses a descriptive-comparative method to evaluate the effectiveness of public housing policies and their compliance with the principles of non-discrimination. Case studies of Rusunawa Pasar Rumput in Jakarta and HDB Flats in Singapore are also examined to provide concrete illustrations within the context of rapid urbanization.

## RESULTS AND DISCUSSION

As countries with high levels of urbanization, Indonesia and Singapore face similar challenges in providing decent and affordable housing for urban residents. Despite facing similar issues, both countries implement different approaches to public housing policy. In Jakarta, public housing is realized through the Rental Flats (Rusunawa) program and home ownership subsidies for Low-Income Communities (MBR). Meanwhile, Singapore through the Housing and Development Board (HDB) implements an integrated public housing system that not only provides housing for families, but also for singles, the elderly, and informal workers. This section will describe the development, characteristics, and implementation mechanisms of public housing policies in each region as a basis for comparative analysis of their effectiveness and inclusiveness. The development of public policy and housing programs in Indonesia has undergone significant changes since the colonial period to the reform era. During the Dutch colonial period, housing policy focused more on providing housing for Dutch citizens and improving villages to reduce the risk of disease. After independence, the Old Order government began to form institutions to handle public housing, but economic limitations hampered the implementation of broader programs. Major changes occurred during the New Order with the establishment of Perumnas, BTN, and REI, as well as the implementation of various programs such as the Kampung Improvement Program (KIP), simple houses, flats, and large-scale housing development. Entering the reform era, housing policies were increasingly oriented towards providing decent housing with various financial assistance schemes, such as the one million houses program and self-help housing stimulus assistance to accelerate the provision of housing for low-income communities. Over time, the government's approach continued to evolve with the integration of balanced housing policies and the formation of regulations that encourage wider access to decent housing.

Singapore's public housing system, managed by the Housing and Development Board (HDB), has seen rapid development since its inception on 1 February 1960 to address the country's housing crisis. Prior to the HDB, housing in Singapore was managed by the Singapore Improvement Trust (SIT), but this failed to provide enough housing for the growing population. In its first decade, the HDB managed to build over 120,000 houses, addressing slum issues and improving people's living standards. In 1964, the HDB launched the Home Ownership Scheme, allowing Singaporeans to purchase flats with a 99-year tenure, which was reinforced by the policy of using Central Provident Fund (CPF) funds for home purchases since 1968. This policy led to a high home ownership rate, reaching 92% in the following years. Over time, the HDB has focused not only on providing housing, but also on building self-contained townships with complete facilities, such as schools, shopping malls, and public transportation. In 1995, the Selective En Bloc Redevelopment Scheme (SERS) was introduced to rejuvenate old areas and



replace them with modern housing. Then, in 2007, the Remaking Our Heartlands (ROH) initiative was launched to improve the quality of the residential environment. In recent decades, HDB has become increasingly sustainability-oriented with projects such as Treelodge@Punggol, which is a model for green housing with energy-efficient technologies and improved waste management systems. The HDB Greenprint programme was also introduced to integrate sustainability concepts into public housing. Today, more than 80% of Singapore's population lives in HDB flats, making it one of the most successful public housing systems in the world. With a focus on innovation, sustainability and social well-being, HDB continues to evolve to meet the changing needs of Singaporeans.

Efforts to ensure right on adequate and inclusive housing has become attention main in various instrument law international. This right acknowledged as an integral part of right basic human and related close with dignity humanity, welfare social, and justice social in the environment urban . One of the provision important underlying right on housing area listed in Article 25 of the Universal Declaration of Human Rights Human Rights (UDHR) . This article state that

“ Everyone has the right on level adequate living for health and well-being himself and his family, including food, clothing, and housing, as well as on guarantee social in matter unemployment, sickness, disability, widow, age continue, or lack livelihood consequence external conditions his power.” Provision This show that housing area is right the basis that is not inseparable from need life human , besides right on health , education , and employment.

Furthermore, the provisions similarly also emphasized in Article 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR). This article confirm that the states parties " confess right everyone above standard decent life for himself and his family , including adequate food , clothing and housing , as well as repair sustainable on condition “ Countries that ratify the ICESCR, including Indonesia , are law international bound For fulfill , protect , and respect right on adequate housing for all over its citizens , without discrimination.

For to clarify scope of the norm , the UN Committee on Economic, Social and Cultural Rights (CESCR). Then issued General Comment No. 4 on the Right to Adequate Housing in 1991. Document This give interpretation comprehensive about elements that must be fulfilled so that a residence can categorized as housing area worthy. According to CESCR, the right on housing area No only understood as availability of roof for take shelter, but must covers aspect security law on ownership or rent, affordability cost, eligibility physical, accessibility for group vulnerable, adequacy facility basic, strategic location to jobs and facilities general, and conformity culture . General Comment No. 4 as well firm state that " No may There is form discrimination in access to decent housing , good based on age , type gender , economic status, background behind ethnicity, marital status, and type work ."

Third instrument This become runway main in study This For evaluate whether policy housing area the public in Jakarta and Singapore have fulfil standard right on housing area appropriate and inclusive. In particular , the section This will highlight How policies in both countries accommodate or precisely exclude group prone to like public earn low , single , and informal workers from access the dwelling that should be become right basic base .

Comparison achievement housing area public in Jakarta and Singapore showed quite a difference significant . Until moment This , Singapore has succeed provide housing area public for about 80% of the population , of which 88% have ownership status of residential units built by the Housing and Development Board (HDB). The system This become bone back provision residence worthy for public earn low until medium , at the same time play a role in addressing housing backlog national .

On the other hand , Jakarta still face challenge Serious in provision housing area public. Based on data from the Central Statistics Agency, the level of housing backlog national reach 12.7 million units in 2023 , with around 75% are in urban areas, including Jakarta. The Rental Apartment Program (Rusunawa) initiated by government area still relatively limited, good from

aspect number of units and coverage group recipient its benefits. In addition, although available scheme subsidy rent, price rent Flats Still Not yet fully affordable If compared to with level income High Income Community Group Low (MBR).

Aspect accessibility also shows difference striking between both countries. Singapore via HDB system provides room more access inclusive for group vulnerable, including singles , informal workers, and the elderly. Subsidy schemes , provision of rental units subsidized (Public Rental Scheme), as well as convenience administration through the Central Provident Fund (CPF) allow various group public to obtain residence worthy, without discrimination on marital status and also type work.

Temporary that , in Jakarta, based on Regulation Governor of DKI Jakarta Number 111 of 2014 concerning the Mechanism for Occupancy of Flats Simple Rent, terms rent House stack that only may domiciled in DKI and already married, and there are also provisions administrative Rusunawa which requires card family (KK) and formal pay slips instead become obstacle for singles and informal workers for can access residence public . This is cause part group prone to the forced settled in the area informal settlements that are not worthy inhabit , or even No own place stay remains . This condition show that policy housing area the public in Jakarta still Not yet fully inclusive and inclined nature exclusive to group public certain . If analyzed based on standard law international as stated in Article 25 of the UDHR, Article 11 of the ICESCR, and General Comment No. 4 of the CESCR, Singapore is more succeed fulfil principle right on housing area worthy and inclusive. The Singapore government through the HDB does not only ensure availability affordable housing , but also guarantees fair access for all over group inhabitant without discrimination.

On the contrary, the policy housing area the public in Jakarta still Not yet fully fulfil principle of non- discrimination and inclusivity as mandated by the instrument law international The provisions that are not allow singles and informal workers rent Flats is form exception administrative which is not in line with principle justice access in right on housing area worthy . Based on provisions of General Comment No. 4 CESCR, the state is obliged ensure that right on housing area can accessible to all citizens, without looking at marital status, type work, and group social certain .

In Singapore, the role government in provision housing area public run in a way direct and dominant through institution special namely the Housing and Development Board (HDB). HDB functions as planner, developer, and manager public housing. Not only build residence For public earn low and medium, HDB also regulates system ownership, scheme rent subsidized, up to determination price affordable sale and rent . The role of the state in context this is very strong, because around 80% of Singapore 's population lives in residential areas integrated HDB public with system transportation, facilities social, and services public others. The state also stipulates scheme priority for group prone to like elderly, single aged over 35 years, informal workers, and sufferer disability. Policies based on control of this country proven effective in create access inclusive housing without social status discrimination and also type work.

Different with that, in Indonesia, the provision of housing area public Still dominated by the sector private sector. The government, through the Ministry of PUPR and the DKI Jakarta Provincial Government , only play a role as a regulator and provider part small residence public , such as through the Rental Apartment (Rusunawa) program and subsidies financing House for High Income Communities Low (MBR). However , the scope of the program Still limited Good from aspect number of units, distribution area , and criteria recipient benefits . In addition , there are no existence institution special HDB equivalent makes coordination between institution in management housing area the public in Indonesia becomes weak and fragmentary. As a result , access housing area public become no even and tend to be exclusive, especially for group singles and informal workers who do not fulfil condition administrative .

**Situation** This show that Indonesia's dependence on market mechanisms and sectors private in provision residence not yet capable present system inclusive and equitable housing social as mandated by law international . Without existence control direct and role dominant government in provision housing area public, difficult for Jakarta to reach condition ideal inclusivity as implemented in Singapore.

One of the public housing policies in Jakarta that is realized through the Rental Flats (Rusunawa) program until now still sets a number of fairly strict administrative requirements for prospective residents. Based on the provisions of the Jakarta Provincial Public Housing and Settlement Area Agency, prospective Rusunawa tenants are required to have a Jakarta Family Card (KK), show a formal pay slip or proof of fixed income, and have family status. This provision directly makes it difficult for single groups and informal workers who do not have a Jakarta KK or a fixed income that is formally recorded to be able to meet the requirements as Rusunawa residents.

These administrative requirements create structural barriers that systematically exclude single people and informal workers from access to government-provided public housing. In fact, these two groups constitute a significant portion of Jakarta's urban population, which often experiences difficulties in accessing housing due to high rents in the private sector. This condition contributes to the growth of informal settlements and uninhabitable housing on the outskirts of the city, as these groups have no legal affordable housing alternatives.

In addition to exclusive administrative provisions, the Rusunawa program also does not provide a special rental subsidy scheme for singles and informal workers. So far, the subsidy scheme has been more focused on Low-Income Communities (MBR) families with official marital status, so that non-family groups are practically not included in the priority list of public housing beneficiaries. This familial policy shows the still low level of inclusivity of the public housing system in Jakarta, especially in reaching vulnerable non-family groups. Different with conditions in Jakarta, Singapore through the Housing and Development Board (HDB) implemented policy housing area more public inclusive. Singapore has a Public Rental Scheme which is not only intended for family, but also provides scheme special for single citizens aged 35 years and over to above, and for informal workers through mechanism subsidy rent based on income actual, without must have a formal pay slip or family status. The system This allow group single and permanent informal workers can access residence public subsidized legally and safely, without obstacle discriminatory administrative.

**Difference approach** This show that non-inclusion in system housing area public in Jakarta more influenced by the provisions administrative which is not adaptive to condition socio-economic contemporary urban society, where the number of Bachelor productive and informal workers continue increased. Singapore with policy housing area its flexible and user - based public need succeed overcome challenge this, while Jakarta is still dwelling on paradigms familial and formalistic policies.

Singapore's public housing policy managed by the Housing and Development Board (HDB) is known as one of the most inclusive and structured systems in the world. This system provides various types of public housing schemes, both for ownership and rental, with beneficiary criteria designed to reach all levels of society without discrimination of social status or occupation. Under the Public Rental Scheme managed by HDB, houses are rented to Singaporean citizens with basic requirements of Singapore citizenship, a minimum age of 21 years for families or 35 years for single individuals, and a household or personal income below a certain threshold. Interestingly, this scheme does not require official family status for single residents who have met the minimum age. In addition, informal workers who do not have formal pay slips can still apply for rental through flexible calculation of actual income that is verified, for example through CPF (Central Provident Fund) records or self-declared income .

Singapore also implements a priority scheme for vulnerable groups in its public housing system. This includes single aged citizens, people with disabilities, low-income informal

workers, and senior citizens. HDB provides special housing blocks for seniors with supporting facilities such as dedicated lifts, emergency call systems, and integrated healthcare services in the residential areas. In addition, HDB rental units for individuals or couples without children are still provided with a subsidy scheme adjusted to actual income levels, thus ensuring equitable access for groups that are often marginalized in the family-based housing system. For support accessibility price rent and ownership, the Singapore government through HDB also provides diverse scheme subsidies and housing grants. Among them are the Rental Housing Scheme, Special CPF Housing Grant, and Additional CPF Housing Grant that are intended for citizens with income low, including informal workers. Subsidies This can in the form of piece price rent monthly, subsidy cash, or subsidy financing house. This scheme allow tenant or buyer House public pay price residence far below market price, so that ensure affordability and inclusivity without considering marital status, age, or type work.

This policy model in Singapore show that the state plays a role active in adapt provisions and subsidies housing area public in accordance need social its citizens, so that capable create system safe, affordable and inclusive housing for all over group society, including group vulnerable. Policy housing area public in Jakarta, especially through the Rental Apartment (Rusunawa) program, up to now Still show form apparent non- inclusion to group singles and informal workers. Non-inclusion this is most visible in a number of aspect following :

First, there is discrimination administrative that makes group single and worker informal difficult access Rusunawa. The provisions of the DKI Jakarta Housing Agency in general firm requires the existence of a Family Card (KK) and formal pay slip as prerequisite main rental of Rusunawa units . This is in a way automatic exclude single living Alone and also informal workers whose income No recorded in a way official. Second, injustice access This aggravated by not existence scheme special rent cheap or priority for singles and the informal sector. During this, almost all Rusunawa units intended for for family with marital status legal and income remain. As a result, non- family groups forced renting in the informal sector or live in a residence slums that are not fulfil standard eligibility.

To see the extent of inclusivity in public housing policies in Jakarta and Singapore, it is necessary to conduct an analysis of policy implementation based on quantitative data. This comparison includes several key indicators such as the number of public housing units available, the percentage of residents living in public housing, rental prices, administrative requirements, and the availability of subsidy schemes for vulnerable groups.

**Table 1.1 Indicators Comparator**

Indicator	Jakarta	Singapore
% Population in public housing	<5% (2024)	~77.4% (2024)
Number of public housing units	33,830 units (2024)	~1.18 million units (2023)
Housing backlog	~1.8 million units (2021)	There is no big backlog
Development ratio	~2% backlog/year	Backlog ~0
Rental access: single & informal	Single: No, Informal: Can (condition)	Single & informal: Yes (conditions)
Priority for the elderly	Not yet a priority (Governor's Regulation plan)	There is a senior priority scheme
Administrative requirements	E-KTP, DKI Family Card, NPWP, pay slip	SC, age $\geq 21$ , income $\leq$ S\$1500
Rental price	Rp550 thousand–Rp1.8 million/month	S\$26–S\$275 PRS, S\$2350–S\$3200 market
Subsidy & financing schemes	Rusunami KPR subsidies, 5% interest	CPF, EHG up to S\$120k
Ownership status	Rusunawa: rent, Rusunami: sell 99 years	HDB leasehold 99 years
Legal protection	Governor Regulation 111/2014	Housing Act (strong)
Active subsidy unit	33,830 units (2024)	58,000 PRS units (2023)
Residential area	36 m <sup>2</sup>	45–130 m <sup>2</sup>



Basic facilities	Lift, water, electricity, garden	Lift, generator, CC, garden
Location	5 administrative cities of Jakarta	All over Singapore

Source : Analysis Writer

Non-inclusion group singles and informal workers from system housing area the public in Jakarta has impact serious social and economic issues. First, the This push growth area settlement slums on the outskirts city, because group the No own legal access to residence affordable and decent. Second, inequality social the more widen Because group certain in a way systematic marginalized from facility housing area public. This is create segregation social in room city, where only inhabitant status family and have income still the one who gets it protection residence publi . Third, in term long, situation This can influence stability social and welfare city. Inequality access to housing area worthy can trigger problem other social issues such as urban poverty, crime, and reduced quality life urban society. Cities become the more No inclusive, and gaps social economy between group inhabitant more and more difficult addressed.

Therefore that, without repair system policy housing area more public fair and adaptive, Jakarta has the potential experience crisis long-term urban dwelling. Learn from practice inclusivity in Singapore, government regions and centers need formulate repeat policy housing that guarantees equal access for all over inhabitant city without discrimination of social status and gender work.

## CONCLUSION

The comparative analysis reveals significant differences between Jakarta and Singapore's public housing policies in terms of effectiveness and inclusivity. Singapore, through the Housing and Development Board (HDB), has successfully provided decent housing for over 80% of its population with integrated services, comprehensive subsidies, and inclusive access for vulnerable groups such as singles, informal workers, and the elderly. In contrast, Jakarta faces a high housing backlog and administrative requirements that exclude these groups from accessing Rusunawa units. Measured against international human rights standards, Singapore demonstrates stronger adherence to the principles of fair access and non-discrimination, while Jakarta's policies remain limited and exclusive, driven by a formalistic, family-centered approach that is unresponsive to urban socio-economic dynamics.

The Indonesian government, particularly in Jakarta, must reform public housing policies by eliminating discriminatory administrative conditions and developing an inclusive subsidy system for singles and informal workers. Establishing a dedicated public housing authority similar to Singapore's HDB is recommended to manage and integrate public housing provision under direct state control. Additionally, increasing budget allocations and ensuring all housing programs comply with the principles of fair, inclusive access as mandated by international law is essential for addressing the urban housing crisis and social inequality in Jakarta.

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