

Comparative Analysis of the Real Estate (Regulation and Development) Act, 2016 (RERA) and International Real Estate Regulatory Frameworks: Lessons from the UK, Singapore, and UAE

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Abstract- The Real Estate (Regulation and Development) Act, 2016 (RERA), marked a significant government effort to restore order, transparency, and basic accountability in the housing sector.

This paper compares RERA to similar regulatory frameworks in the United Kingdom, the United Arab Emirates and Singapore. The comparison focuses on five dimensions: institutional structure, developer regulation, buyer protection, enforcement mechanisms, and digital governance. The goal is to see how well each system handles fairness and transparency, and what India might learn from them.

RERA has undoubtedly created a more structured regulatory environment. Still, noticeable gaps remain — especially in terms of how evenly the rules are enforced

across states, how easily the public can access reliable information, and how fully digital tools are utilised to facilitate progress.

This paper highlights international best practices to strengthen RERA's operational effectiveness and proposes policy recommendations to harmonise financial safeguards and enhance consumer literacy. The study contributes to regulatory governance literature by demonstrating how institutional design shapes market trust and sectoral performance in developing economies.

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I. INTRODUCTION

The real estate sector plays a central role in India's economic growth.

Yet, historically, it has been marked by information asymmetry, delayed possession, diversion of buyer funds, and weak grievance redressal mechanisms.

Before 2016, homebuyers had limited legal remedies and developers operated with minimal oversight, leading to widespread mistrust and market inefficiencies.

RERA was enacted to address these structural deficiencies by introducing mandatory project registration, escrow requirements, standardised disclosures, timelines for completion, and state-level regulatory authorities. However, the federal design—where each state establishes its own authority—has led to inconsistencies in penalties, transparency, technological capabilities, and enforcement. Comparing RERA with international frameworks helps identify areas for improvement.

II. RESEARCH GAP & MOTIVATION

Existing literature lacks structured comparative analysis between RERA and mature global regulatory frameworks. This

study addresses gaps by providing systematic evaluation of RERA against high-performing systems in the UK, Singapore, and UAE, highlighting transferable best practices and governance lessons.

III.OBJECTIVES

1. Examine structural and operational features of India's RERA.
2. Compare RERA with regulatory frameworks in the UK, Singapore, and the UAE.
3. Identify global practices that may enhance RERA's effectiveness.
4. Evaluate how different regulatory designs influence transparency, trust, and efficiency.
5. Propose policy reforms aligned with global standards.

IV.RESEARCH METHODOLOGY

This study uses a conceptual-comparative design based on secondary data from statutory documents, regulatory reports, and academic literature. The comparative framework includes legal structure, developer regulation, buyer protection, dispute resolution, and digital governance.

V. COMPARATIVE ANALYSIS OF RERA AND INTERNATIONAL

REAL ESTATE REGULATORY FRAMEWORKS

1. Conceptual Basis of Real Estate Regulation

The push for **stronger regulation** in real estate stems from a long-standing imbalance: developers typically hold significantly more information about a project than the people buying into it. They are aware of the actual timelines, the status of approvals, the actual costs, and any potential issues that could slow things down. Buyers, on the other hand, are left to rely on polished brochures and whatever the developer chooses to share. This knowledge gap has repeatedly led to delays, misuse of funds, and a gradual loss of public confidence.

This uneven access to information has long created room for delays, financial misuse, and a steady erosion of public trust. Across countries, regulatory systems have evolved to address these risks. Their purpose is threefold: **to protect buyers, to maintain market stability, and to make the entire process more transparent through clear institutional rules.** These needs are even more pressing in countries like India, where land records are often inconsistent and the enforcement of contracts can be unpredictable.

RERA was introduced as a direct response to these conditions. It aims to move the real estate sector away from loosely organised, trust-based dealings toward a system governed by clear rules and accountability. Examining how more mature markets regulate their real estate industries offers valid points of comparison, enabling the identification of institutional arrangements that best balance consumer protection with the incentives that developers need to operate efficiently.

2. Overview of the RERA (India)

RERA was set up to bring clarity and accountability to India's growing real estate market. It makes it mandatory for larger residential and commercial projects to be registered and requires developers to share key information such as approved plans, financial details, and construction progress on public platforms.

Main points:

- **Project registration and disclosure:** Developers must register a project before they can advertise or sell it. All approved plans, permissions, timelines, and promoter information must be posted on the state RERA website.
- **Escrow requirement:** Seventy percent of the money collected from buyers must

be placed in a dedicated escrow account and used only for that project, preventing diversion of funds.

- **Timely delivery:** Builders are legally required to finish projects within the promised deadline. If they fail, they may face penalties or interest obligations.
- **Regulatory bodies:** Each state has its own Real Estate Regulatory Authority to monitor compliance and settle disputes, supported by an Appellate Tribunal.
- **Agent registration:** Real estate agents must be registered under RERA, which formalizes and regulates brokerage activity.

Although the Act is well designed, its enforcement differs from state to state. Some authorities take a more active approach than others. Limited awareness among homebuyers also reduces its overall impact. In comparison, several international systems operate with more consistent enforcement and higher consumer awareness.

3. Comparative Framework: UK, Singapore, and UAE

3.1. Overview of the RERA (India)

Property regulation in the United Kingdom has developed over many decades, resulting in a system that places strong emphasis on clarity of ownership, consumer rights, and professional accountability. Several laws shape this environment, and various regulatory bodies oversee day-to-day practice within the real estate sector.

Land Information and Ownership

HM Land Registry maintains property records in England and Wales. The registry enables the public to search for ownership details, past transfers, and any legal rights associated with a property. Because most information is easily verifiable, disputes over ownership are less common and attempts at fraudulent sales are more challenging to carry out.

Protections for Buyers and Tenants

UK consumer law requires anyone selling or marketing a property to disclose information that could affect a buyer's decision. Withholding important details or providing misleading information can result in legal penalties. These rules ensure that buyers and renters understand the property and what they are agreeing to before completing a transaction.

Handling Complaints

When disagreements arise between clients and property professionals, many cases are

handled by the Property Ombudsman. The ombudsman offers a low-cost, accessible route for resolving concerns, which helps reduce the need for formal legal action.

Expectations for Industry Professionals

Estate agents are overseen by the National Trading Standards Estate Agency Team to ensure they follow proper ethical and professional standards.

Implications for Business Management

With respect to UK Companies, the compliance with these rules is more than a requirement—it significantly influences how clients perceive their reliability. Clear documentation, honest communication, and adherence to established standards can enhance a firm’s reputation and foster trust with buyers, tenants, and investors.

3.2 Singapore

Singapore’s **regulation** of the private housing market is anchored in a framework that gives the state an active and visible role in supervising real estate activity.

The Housing Developers (Control and Licensing) Act provides the legal foundation, while the **Council for Estate Agencies** oversees day-to-day professional standards within the industry. Once a project is underway, buyers do not pay in a single lump sum but follow a schedule tied to the

verified pace of construction, which limits their exposure to unfinished developments. The financial side of each project is kept strictly separate through dedicated accounts that may be used only for expenditures linked to that specific development. When disagreements occur between buyers and developers, the **CEA** offers structured channels for mediation that help resolve issues without lengthy legal disputes. Much of the market’s credibility also stems from the availability of detailed online information—government sites routinely publish data on construction progress, developer track records, and market transactions. The Singaporean model shows how firm regulatory direction, combined with high transparency, can foster both investor **confidence** and **consumer trust**, making the country’s property sector unusually stable by **international standards**.

3.3 United Arab Emirates (Dubai)

Dubai’s Real Estate Regulatory Agency (RERA), set up in 2007 under the Dubai Land Department (DLD), oversees the emirate’s property sector with a system designed to protect investors and keep projects financially secure.

Main elements of the framework:

1. **Escrow accounts:** Every development must have its own escrow account, held with a RERA-approved bank. Money paid by buyers can only be used for building the project.
2. **Registration and licensing:** Developers and their projects must be registered with RERA before they are allowed to advertise or sell units.
3. **Dispute resolution:** Real estate cases are handled by dedicated courts within the DLD, which helps settle disputes more quickly.
4. **Digital services:** Platforms such as *Dubai REST* and *Ejari* give access to

property information, ownership records, and rental registration online.

5. **Marketing rules:** Advertising is regulated to prevent misleading claims and speculative promotions.

Dubai's system combines strict oversight with digital tools, making the real estate market more transparent and giving buyers and investors greater confidence.

4. Comparative Evaluation: RERA vs. Global Counterparts

Dimension	India (RERA)	United Kingdom	Singapore	UAE (Dubai)
Legal Structure	Central act with state-level authorities	Centralized, under consumer protection and land laws	Centralized under HDCLA	Centralized under DLD
Developer Regulation	Mandatory registration	Licensed agents and fair-trading laws	Licensing and financial vetting	Licensing and escrow-linked regulation
Buyer Protection	Escrow requirement (70%)	Disclosure obligations	Progressive payment system	Full escrow control
Dispute Resolution	Authority & Appellate Tribunal	Property Ombudsman	CEA Mediation	Real Estate Court
Transparency	State RERA	Land Registry	CEA and	Dubai REST &

Mechanisms	portals		Controller databases	Ejari
Enforcement Consistency	Variable across states	Uniform and national	Centralized	Centralized
Digital Integration	Partial and uneven	Moderate	Advanced	Highly advanced

India uses a state-led system, so the results differ from state to state. The UK, Singapore, and the UAE use national systems with the same rules everywhere.

5. Learnings and Implications for India

5.1 Institutional Uniformity

RERA's effectiveness is undermined by the diversity in state-level implementation. Establishing a **National Real Estate Regulatory Council** could harmonize practices and standardize penalties. International models demonstrate that centralized oversight ensures predictability for investors and developers.

5.2 Digital Governance

Dubai and Singapore showcase how **digital integration** enhances transparency. RERA portals across Indian states should adopt standardized dashboards, real-time updates, and blockchain-based verification for project

milestones and fund flows. Such integration would also deter fraudulent listings and information manipulation.

5.3 Professionalization of Developers and Agents

In line with the UK and Singapore, India could adopt stricter **licensing and continuing education requirements** for real estate professionals. This would promote professionalism and reduce consumer grievances arising from misinformation or unethical conduct.

5.4 Financial Accountability and Risk Management

RERA's 70% escrow rule is commendable but lacks strong enforcement. The UAE's practice of **bank-supervised escrow accounts** and **progress-based fund release** provides a superior safeguard. Adopting similar mechanisms could reduce project delays and improve buyer confidence.

5.5 Enhancing Consumer Literacy

Internationally, regulatory effectiveness correlates with consumer awareness. India's RERA should integrate structured buyer education initiatives through digital campaigns, helplines, and multilingual outreach, enabling consumers to make informed decisions.

6. Theoretical and Managerial Implications

From a theoretical standpoint, this comparative study underscores **institutional theory's** argument that effective market functioning depends on stable, transparent, and enforceable rules (Scott, 2001). In business management terms, compliance transforms from a reactive legal necessity into a **strategic capability** that enhances brand reputation and investor trust. Developers operating under RERA who integrate compliance systems into their organizational culture are likely to achieve long-term competitive advantages similar to those observed in advanced markets.

For policymakers, benchmarking against global standards provides pathways for **regulatory innovation**. Integrating international practices not only strengthens governance but also enhances India's

attractiveness to institutional investors seeking predictable, transparent markets.

VI. Conclusion

The comparative analysis reveals that while RERA has significantly advanced the Indian real estate sector's regulatory maturity, it remains a **developing framework** relative to the highly institutionalized systems in the UK, Singapore, and UAE. RERA's federal structure offers flexibility but also introduces inconsistency. The UK's emphasis on disclosure and fair trading, Singapore's progress-linked financial safeguards, and Dubai's digital escrow governance offer valuable lessons for strengthening RERA's architecture.

To achieve global competitiveness, India must prioritize **institutional uniformity, digital integration, professionalization, and consumer awareness**. Beyond regulation, fostering a culture of compliance among developers is crucial for sustaining buyer confidence. RERA's long-term success will depend not merely on legal enforcement but on how effectively it aligns stakeholder incentives—ensuring that transparency and accountability become intrinsic values within the Indian real estate ecosystem.

Ultimately, RERA's evolution should mirror India's economic aspirations: moving from

compliance-driven regulation to **trust-driven governance**, where transparency serves as both a moral and strategic cornerstone of market development.

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