



COMPARATIVE ANALYSIS OF WAQF INSTITUTIONS GOVERNANCE IN INDIA AND SINGAPORE

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Abstract: Waqf refers to a specific form of philanthropic charitable act that is practiced by allocating a non-perishable tangible asset. It involves designating categories of beneficiaries who are entitled to receive its benefits or income. This research investigates the governing structures of Waqf institutions in India and Singapore, with the objective of comprehending the intricate factors that influence their operational functionality. This research aims to explore the differences and similarities in the governance structures of waqf in both countries, considering its significance in their socio-religious landscapes. The main objectives of this comparative analysis are to examine the governance models of Waqf institutions in India and Singapore, identify regulatory mechanisms, and evaluate their impact on the administration and utilization of Waqf assets. Additionally, the study aims to illuminate the socio-economic implications of the differences in governance and assess the effectiveness of each model in preserving the intended socio-religious goals of Waqf endowments. This paper is grounded on research conducted using available written materials, and it embraces the qualitative research framework to analyze the literature at hand. By assessing and comparing the governance of Waqf institutions in India and Singapore, significant disparities are uncovered. India's approach is characterized by decentralization and the existence of various regulatory bodies, Singapore adopts a more centralized approach. The study sheds light on how different governance structures impact the effectiveness, transparency, and sustainable management of Waqf assets. Financial sustainability,

community involvement, and adherence to socio-religious purpose emerge as pivotal factors that differentiate the two models.

Keywords: Waqf Philanthropy, Governance, India, Singapore

INTRODUCTION

In the Islamic history, the first waqf is the mosque of Quba' in Madinah, built upon the arrival of the Prophet Muhammad, pbuh, holds the distinction of being the first religious Waqf in the Islam. Currently located on the same site, the mosque has undergone renovation and expansion. Six months later, the mosque of the Prophet in the center of Madinah was established, following the example set by Quba'. In the realm of religious Waqf, both mosques and real estate properties are dedicated to generating revenues that go towards the maintenance and operational costs of mosques(Kahf, 2016).

Waqf for Philanthropic Purposes aims to provide assistance to the privileged members of society, as well as support various activities that benefit the general public. These activities include the establishment of libraries, scientific research, education, healthcare services, animal welfare, environmental conservation, lending to small business owners, creation of parks, construction of roads, bridges, dams, and more(Abdullah, 2020b). Philanthropic Waqf has its roots in the actions of the Prophet Muhammad, pbuh, who received a bequest from a Jewish man named Mukhairiq. Upon the man's passing, the Prophet, pbuh, took possession of his seven orchards in Madinah and transformed them into a charitable Waqf. This practice was then

continued by the Prophet's companions and his second successor(Kahf, 2016).

A number of endowments were established by the companions of the Prophet Muhammad SW, some of which were approved by him personally. Imam al-Shafi'i mentions that he knows of eighty companions from the ansar who made specific donations, known as waqf. Therefore, Umar (may Allah be pleased with him) made one of the earliest endowments in the history of Islam when he designated a piece of land obtained from the conquest of Khaybar as a waqf to benefit the poor, relatives, for freeing slaves, for jihad, and for travelers and guests(M Sadique, 2016). Arabs did not establish any public foundations prior to Islam This fact was emphasized by Imam al-Shafi'i, who stated that during the period of Jahiliyyah, the legal concept of waqf was unfamiliar(M Sadique, 2016).

Moreover, there were millions of awqaf created after the Prophetic period of time for literally every object under the sun. Sadly, the colonial system brought misery to the awqaf as a consequence of colonization. Almost all of them have been abolished or transformed at some point, and most of them were governed by alien legislation. Having to deal with waqf management issues was not a priority for the postcolonial nations because they were too busy with nation-building issues. Several issues were resolved as a result, but some remain unresolved(Ahmedullah, 2017).

India and Singapore, two nations with significant stature in the Muslim world and a shared history of British colonialism, possess a substantial number of Waqf assets in different forms. However, despite their sheer abundance, these assets have not been fully utilized for the

advancement of Muslim communities. The prevailing belief is that this underutilization stems from inefficiencies in the governance of Waqf institutions and mismanagement by their trustees, known as mutawallis. Nevertheless, recent years have witnessed a growing recognition of the potential to rejuvenate Waqf institutions among Muslim communities worldwide. Alongside this revival, there has also been increasing attention to the call for good governance and best practices within the Waqf system (Ali et al., 2023).

It is widely accepted that implementing the principles of good governance essential for the revival of Waqf institution (Anwar, 2018). The primary aim of this comparative study is to examine the governance of Waqf institutions in India and Singapore, both historically and presently, in order to highlight the key issues related to governance and management. This will enable each country to learn from the governance models of the other and to assess their respective strengths and weaknesses (Anwar, 2018). More specifically, this study examines how Waqf institutions are governed and managed in India and Singapore with the purpose of highlighting the key issues involved. It is possible to use the results of this research for development of waqf management in India by using the findings of this research by learning from each other's governance model and looking at the advantages and disadvantages of their respective mode.

LITERATURE REVIEW

The Concept of Waqf

The term “Waqf” is derived from the word “Waqafa” which means to hold, to prevent, or to restrain. (Jawwad) Waqf refers to a

perpetual charitable mechanism. A couple of the main objectives of the Waqf include serving charitable purposes in helping the poor, the paupers, and the indigents. Waqif (endeavors) generally create a Waqf out of religiosity as an expression of their faith, which promises constant spiritual reward (Kahf, 2002).

The Quran does not directly mention waqf. Umar Ibn Al Khattab reportedly acquired a piece of land in Khyber and sought advice from the Prophet pbuh, regarding the land in a hadith reported by Ibn Umar. It has been recommended by the Prophet pbuh, to make the land inalienable and to donate the proceeds to charity. It appears that the first waqf in Islam was land. First waqf-oriented mosque in Islamic history is the mosque of Quba' in Medina, which still exists today. University of Cordova Spain, Al Noori Hospital in Damascus, as well as Al Azhar University in Egypt, use waqf land (M. Mizanur Rahman et al. 2019).

Anwar et al (2018) note that the Islamic Waqf is a noble institution that places a large emphasis on accountability. The mutawalli should be accountable and answerable for their actions. In a contract, there is a trust relationship between the endower and the mutawalli or intermediary, so that the latter must act on behalf of the endower (Hassan, 2017). Waqf endowments must be fully used to generate revenue for Waqf beneficiaries, so trustees are responsible for reporting this information to Waqf endowments and beneficiaries. Because there is no clear-cut regulatory framework or a tight enforcement mechanism, mutawallis are not likely to follow these guidelines. According to Hassan (2017), since the Waqf management takes a long time (typically 3-5 years) to provide annual reports, there

are many problems in reporting, most obviously out-of-date annual reports, which are supposed to be issued yearly. Furthermore, since there is no strict action from the respective authorities, mutawallis overlook their responsibility to deliver annual reports (Hassan, 2017).

(Rasool, 2017) stated that Waqf Boards are in a very vulnerable financial position. According to section 72 of the Waqf Act, Waqf Boards receive 7% of the net income of mutawallis with net annual incomes exceeding 5,000 rupees. In most cases, the awqaf do not generate any income, so such a contribution is negligible. Even paying salaries to the staff is extremely difficult for many Waqf Boards. Waqf properties cannot be developed by them because they are not able to fight cases in courts. The government of some states is now supporting the board with grants. State boards should receive grants from all states, and they should be substantial, not just a formality.

According to him, Waqf records must be maintained in order to protect and preserve awqaf. Almost all Waqf Boards have a record section for this purpose. The Joint Parliamentary Committee on Waqf recommended, among other things, computerizing State Waqf Board records due to poor infrastructure and outdated recordkeeping systems. Therefore, the Waqf Management System of India (WAMSI), has been established in order to address these issues. As a result, streamlined record keeping, introduced transparency, and streamlined record keeping were implemented by the Ministry of Minority Affairs. As a result, the Ministry has granted grants to all Waqf Boards to set up the Centralized Computing Facility in order to computerize the various functions and processes of the Waqf Boards. The Waqf Boards have

been very slow in completing the process. Monthly progress reports are uploaded to the website(Rasool, 2017).

Aimi Fadzirul Kamarubahrin, the Islamic Religious Council of Singapore's director of waqf, states that of the total assets managed by the council, waqf is the largest asset value. In Singapore, all Awqaf is administered by Majlis Ugama Islam Singapore (MUIS). It is the responsibility of the Ministry of Youth and Sports (MCYS) and it is under the auspices of the MUIS statutory board. There is a minister in charge of Muslim affairs in the country, who is the Minister of Muslim Affairs. As part of the Waqf Investment Committee, all matters regarding the sale or development of Waqf assets are first discussed and then escalated for decision-making at the level of the leadership committee and the MUIS council before being concluded by the management committee. It is the Fatwa committee's responsibility to hear any matters concerning shariah if there are shariah issues involved. As long as any investment, purchase, or financial obligation or implications exceed \$5,000,000, the Minister of Finance must approve the investment, purchase, or financial obligation or impact. With respect to the MUIS's administration of waqfs and commitment to excellence, this institution has achieved an ISO 9001 certification for its management and administration of the waqfs. In order to achieve an excellent management system, MUIS strives to achieve excellence at all times (Kamarubahrin, 2018).

Authors, added that, Singapore Quality class has been awarded to the organization which signifies a commitment to meeting the highest levels of quality in terms of its processes, leadership, customer satisfaction and achieving results-oriented goals. According to Ahmed

(2018), Singapore has developed waqf properties into real estates that generate millions of Singapore dollars in economic and religious benefits to mankind each year. Essentially, the economic system is a means of financing society as a whole (Kamarubahrin & Ahmed Ayedh, 2018).

According to (Zurina Shafii et al. 2014), the Waqf sector in Singapore has grown rapidly over the last few years. MUIS requires registration of all Waqf in Singapore. MUIS has been able to create a complete database of Waqf properties, revenues, expenses, and disbursements through the registration of Waqf. This data is critical to the efficient and effective management of the Waqf. For managing, developing, and monitoring Waqf projects, MUIS established its subsidiary. Many Waqf are yet to be developed, according to him. Property locations are some of the most desirable. There are many unproductive Waqf lands that have been successfully converted into huge commercial and residential developments by Warees. MUIS has enabled Waqf revenue to increase exponentially through its efficient and effective management of Waqf assets. To utilize Waqf property potential, a progressive and advanced understanding is required through a sukuk structure. Sukuk Musharaka bonds were introduced by Warees to fund Waqf development in addition to a cash Waqf scheme. Muslims in Singapore as well as abroad can directly involve in developing various Waqf assets by becoming the investor of modern sukuk musyarakah instrument. Presently, there are three types of Waqf administered in Singapore: the family Waqf, the charitable Waqf, and a combination of the family and charitable Waqf.

METHODS

The paper employed descriptive and analytical methodologies. The analytical framework concentrated on the comparison of governance models of Waqf institutions in India and Singapore. This entailed identifying similarities and differences in governance structures, evaluating the effectiveness of regulatory mechanisms, assessing financial sustainability, and analyzing the socio-economic impact of Waqf activities in both countries.

RESULT AND DISCUSSION

Waqf Regulation in India

Regulations and laws are critical to effective waqf management in a country. The Waqf Amendment Act 2013 amended the Waqf Act 1995 to govern waqf administration in India. A total of 113 sections are contained in the Act, which is divided into 9 chapters (Rasool, 2017). It is a requirement of the Act to register each Waqf of the country with its Waqf Board at the very beginning, and a Mutawalli must be required by law to provide the Mutawalli with the appropriate information concerning the Waqfs under their supervision, including the Waqf property details, specific Waqif terms, Beneficiaries are categorized, and Mutawalli is named. After the 1984 Waqf Amendment Act was criticized, the Waqf Act 1995 was passed, allegedly providing too much administrative and management power to local and state governments, which attracted the opposition of the Muslim community (Abdullah, 2013).

Waqf Boards in India

States have established State Waqf Board 17 under the Waqf Act for the general supervision of all waqfs in a State¹⁸ with a five-year term of office. If Shia waqf properties constitute more than 15% of the total waqf properties in a State, there may be a separate Waqf Board for Shias. In addition to possessing perpetual succession, the Board can acquire, hold, and transfer property as well as sue and be sued. In addition to elected members, nominated members may also serve on the Board. A maximum of two members are elected from each of the Islamic electoral colleges that are composed of Muslim members of Parliament, State Legislatures, Bar Councils, and Mutawallis. As well as the nomination of one Muslim, the State Government should choose someone with professional experience in the areas of town planning, business management, social work, finance, revenue, agriculture, and development. As part of this requirement, a Muslim scholar who holds a degree in Shia and Sunni theology, as well as a Muslim officer of the government of the state not below the rank of Joint Secretary (Waqf Act 1995, Sec. 14). Under the Waqf Act of 1995, seven to thirteen members must represent the Waqf board in a particular state, including Delhi, with at a minimum two women among them. Members are elected primarily from Parliament, state legislatures, state bar councils, and mutawalli with an annual income of at least 100,000 rupees (Ahmedullah, 2017).

An executive director appointed by the Waqf Board is a Muslim by faith, appointed by the State Government based on the recommendations of two members of the Waqf Board. Deputy Secretary of the State Government must be the Chief Executive

Officer, or another Muslim officer of equivalent rank may be delegated if a Muslim officer of that rank is unavailable (Rasool, 2017).

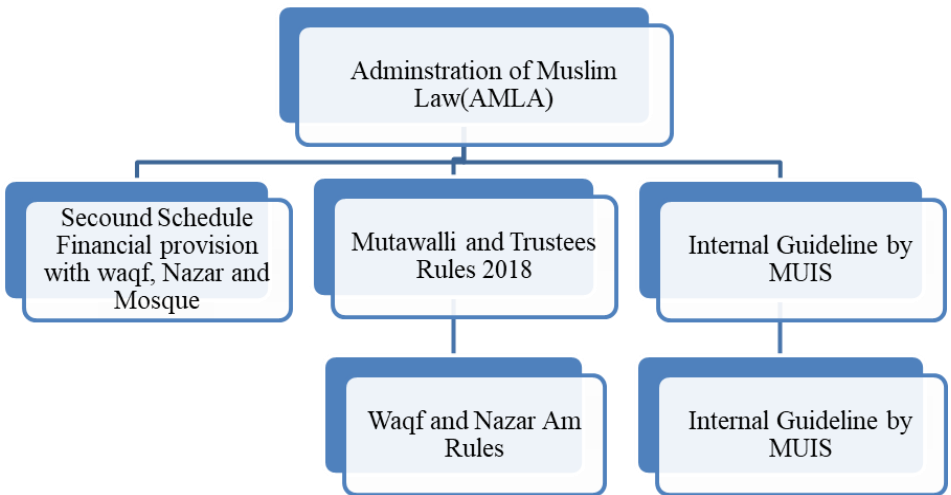
Moreover, in the Waqf Act 1995, provisions are also made for the appointment of the executive officer in cases where the performance of the Awqaf is not satisfactory and the annual revenues exceed five hundred thousand rupees. Importantly, the Waqfs are required to contribute to the expenses associated with the Waqf boards' function. Six percent of each Waqf's total revenues is the rate of their contribution for this purpose (Abdullah, 2013).

The Administration of Waqf in Singapore

Majlis Ugama Islam Singapura MUIS developed and progressed waqf properties in 1991. According to MUIS's records of 1968, there were six awqaf registered (Syed Musa Alhabsh, p,120). **Majlis Ugama Islam Singapura:** MUIS holds all waqf. The Ministry of Community Development Youth and Sports governs MUIS as a statutory board. Muslim Affairs is the responsibility of the senior minister. MUIS' Strategic Unit of Zakat and Waqf is responsible for waqf administration. In order to buy and develop waqf assets, numerous issues are discussed first at the directorate level, and then advanced for consideration at the MUIS council level. The Fatwa Committee hears shariah issues. It is necessary to obtain the approval and agreement of the Minister before making any investment, purchase, or financial obligation over \$5,000,000. MUIS is entrusted with the responsibility of increasing the value of waqf properties for the benefit of beneficiaries as a single trustee. According to estimates, MUIS management closely supervised about 100 waqf in 2009. Over 90% of all waqf have been developed by MUIS. Bencoolen Mosque is one of

the most important projects undertaken. In addition to providing income to the beneficiaries and Muslim society, MUIS has increased waqf income each year(Listiana, 2020).

As part of AMLA, MUIS has the responsibility to provide advice to the President of Singapore on all matters related to Islam in Singapore. MUIS is one of the ministries that are under the Ministry of Community Development, Youth and Sports. There are six departments under this organization: religious development, religious education, buildings, assets, mosques, and social development, as well as organizational development. There are many branches under every department, and at the same time, waqf and zakat are under the department of assets and finances, halal certificates and hajj services are all under the department of assets and finances (Haji-Mohiddin, 2015).



Regulatory framework related to Waqf sectort in Singapore.

Figure 1. Created by author.

Under the Administration of the Muslim Law Act (AMLA), all endowments made before or after July 1, 1968, must be registered with the Assembly office: Article 64 paragraph 1). A mutawalli waqf implements waqf registration under Article 64 paragraph 2. Accordingly, it can be stated that mutawalli (the management of waqf) is the registration of waqf. During the registration process, the mutawalli must describe the conditions of the waqf, the total annual income from waqf management, the estimated annual expenditures, the salary of the mutawalli and documents as evidence of the waqf's assets. In the field, the Majlis investigates (cross checks) the documents included with the factual assets of the waqf assets after the mutawalli completes the registration application. The mutawalli who fails or does not register the waqf, or who gives incorrect information or information, or who prevents the inspection of waqf properties is considered committing a criminal act and may be punished with fines of up to \$5,000 or imprisonment of up to 12 months, or both. Article 64 paragraph 11 of the AMLA specifies this matter (Sari Pertiwi et al., 2019).

Waqf Real Estate Singapore:

WAREES is the corporate name of MUIS's subsidiary company, Waqf Real Estate Singapore (MUIS). WAREES is the corporate name of MUIS's subsidiary company, Waqf Real Estate Singapore (MUIS). It was founded on 26 September 2001. Since January 2002, it has been operating. All baitulmal and waqf properties are managed by this organization. Because the waqf properties in Singapore are increasing in value by the day, they are considered to be the largest pool of funds in the country. The country has a minority Muslim

population. The MUIS has therefore provided significant support for waqf management through its expertise and knowledge. A recent development has generated about SGD6 million to SGD7 million in rent from the construction of 200 waqf properties worth approximately SGD250 million. MUIS intends to become an international participant in managing waqf at all levels in Singapore, which has a very efficient waqf management system. MUIS and WAREES have become more transparent and clearer with the establishment of WAREES. In comparison with WAREES, MUIS has played a primarily administrative role. WAREES focuses on how to increase profits and develop while MUIS focuses on operations such as auditing, supervision, and record maintenance (Haji-Mohiddin, 2015).

MUIS fulfills the role of a nazir, while WAREES performs the role of a mutawalli. Each body has a specific scope of rights over waqf property. Mutawalli performs waqf activities under MUIS's supervision and control as a nazir. In their role as mutawallis, WAREES manages the waqf assets and invests them based on their expertise. The nazir is responsible for approving all activities related to those assets, including the sale and purchase of those assets (Haji-Mohiddin, 2015).

Waqf Management in India

The population of India is roughly 1.3 billion, making it the second-most populous nation on the globe. The population of the country is the world's second biggest Muslim community in the world. There are 172 million Muslims in the country, according to government statistics (Abdullah, 2020a). It is estimated that in the country around half a million Waqf properties are registered. There are over six hundred thousand acres in Waqf properties throughout the

country (Obaidullah, 2014). There is an estimated market value of more than 1.2 trillion Indian Rupees (around \$16 billion) for all Waqf properties scattered across the country. Recent experience suggests that Waqf properties can yield up to 20% returns in ideal scenarios when utilized efficiently in some specific areas (Obaidullah, 2015). Most Waqf properties can easily generate a yield of 10% with a conservative approach if they are managed efficiently (Obaidullah, 2014).

During partition time in 1947, Indian Muslims from Punjab, Haryana, and Delhi moved to Pakistan. Consequently, they sold off or donated a substantial amount of their marketable and utilizable property. There are several Waqf properties throughout Delhi, including Masjids, Madaris, and cemeteries, that have been left alone due to Muslim migration. The Waqf's objectives have suffered as a result. Considering their location, public interest, and sheer quantity and variety of abandoned properties, these properties are of considerable value. Both the spiritual and physical elements of abandoned properties can be significantly affected when new properties replace or substitute them, thereby affecting both the spiritual and physical elements of Muslims in this state. Waqf properties cannot be replaced or substituted according to Shariah, since the Hadith of Umar (RA) mentions that Waqf properties cannot be sold, inherited, or gifted (Aziz & Ali, 2018).

Board authorities do not properly manage Waqf properties, which is the primary cause of this problem. In addition to controlling the Waqf estates, these individuals have been accused of selling them off piece by piece, gaining personal gain. There has been some occupying of Delhi Public School's graveyard nearby, Mathura Road,

recently. 100 meters away is the Police Station. Even though this is a new occupation and is easily vacated with the help of police at the earliest possible time, the Waqf Board has not acted. In this situation, no positive change will occur to release Waqf properties. According to the Sachar Committee, this is the case (J. Ali, 2019).

Mismanagement of Wakf properties often occurs as a result of non-transfers, delays in transfers, or confusion in administrative jurisdictions. In order to improve Wakf management, both administrative and legislative clarity is needed. Due to a high incidence of litigation and poor management, Wakf properties are currently severely impaired in terms of management. Lack of financial and administrative resources leads to the loss of valuable Wakf cases and properties (J. Ali, 2019). In accordance with the management of Waqf of movable property, there are three situations in which Waqf of all kinds may be replaced: (1) by the Waqif at the time the Waqf is created; (2) after the Waqf has become inactive; (3) when the Waqf is more profitable and produces higher returns, and there are no conditions the Waqif prohibits the sale. Specifically, they quoted Fatwa al-Sirjiyyah, which permits both replacement and substitution: A Waqf property may be sold or exchanged if it is clearly in the Waqf's interest. Suppose, for instance, someone is eager to acquire a property without generating any income, and in exchange wants to give the Waqf a piece of land or house that will generate revenue. In that case, the exchange is authorized by Abu Yusuf and Muhammad (J. Ali, 2019).

Waqf Management in Singapore

Geographically, Singapore is a small state, with a main island measuring 42 km in length from west to east, and 23 km in length from

north to south. Singapore is located on the Malay Peninsula (Austcham Singapore, n.d.). In 2011, the government estimated that the total population was 5,187.7 million. In Singapore, a wide variety of religions can be found, as there are many immigrants from different countries (Haji-Mohiddin, 2015). In addition, the dominant religion in Singapore is Buddhism, as most of its residents are ethnic Chinese (China). Singapore has a Muslim population of 14.7%, mostly Malays. The Islamic community in Singapore is a religious minority, yet it has the freedom to practice its religious teachings, including the waqf (Sari Pertiwi et al., 2019).

As a result, MUIS acts as nazir and WAREES acts as mutawalli. Waqf property belongs to both bodies within a specific scope. MUIIS is responsible for supervising and controlling waqf activities carried out by mutawalli as a nazir. Waqf assets are managed by WAREES as mutawalli based on their expertise. Nevertheless, the nazir must approve any activity concerning those assets, including the sale and purchase of those assets (Haji-Mohiddin, 2015).

It is considered most suitable to use the istibdal method in developing and producing waqf land in Singapore because it is considered to be the most appropriate method. The waqf assets in Singapore were initially low in value and ineffective, however, after using the istibdal method, they were high in value and productive. An istibdal property endowment occurs when a waqf sells all or part of its land and uses the proceeds to acquire other waqf lots. Istibdal institutions provide funds for waqf investment projects by substituting less valuable waqf land (assets) for more valuable waqf land. It is an example of istibdal when waqf property is sold and other assets are

acquired for the same purpose. Waqf projects can also be financed by selling waqf assets and buying property with a higher value.(Mohammad et al., 2005).There are three countries in the world that practice the istibdal concept: Malaysia, Singapore, and Indonesia(Sari Pertiwi et al., 2019).

MUIS often builds waqf projects using istibdal in Singapore. Istibdal can be used under certain conditions according to the Singapore Fatwa Committee: First, waqf assets need to be restored. Secondly, waqf assets are at risk of being acquired. Third, the locations of waqf assets are not suitable for chaotic areas. Fourth, by relocating and rebuilding waqf assets, better profits can be produced. As a means of investing in the development of waqf properties, istibdal can be used as an investment instrument. It is recognized in both the law and jurisprudence that eversible waqf is a solution that avoids the loss of endowments to the benefit of mawquf(Sari Pertiwi et al., 2019).

Discussion

In this section, there is a discussion of waqf management law and regulation in each country. Analyzing the composition, roles, and performance frameworks of waqf management focused of the comparative analysis. This comparative analysis seeks to explore the governance structures and practices of Waqf institutions in India and Singapore. By examining the similarities and differences between these two nations, valuable insights can be gained regarding the effectiveness of their respective governance frameworks.

Governance Structure in India centers around the administration of Waf institutions as per the Waqf Act 1995. This act establishes a legal framework for their management. At the state level, individual

Waqf properties are overseen by the respective Waqf boards, while the Central Waqf Council supervises their overall functioning. However, there are concerns about the transparency and accountability of the Indian governance structure, which has resulted in mismanagement and encroachment on Waqf properties (Khan, 2014). In contrast, Singapore has implemented a well-defined governance structure for its Waqf institutions. The Islamic Religious Council of Singapore (MUIS) assumes the role of the central authority responsible for all Islamic affairs, including the management of Waqf. To ensure effective management, MUIS has set up a dedicated department called the Registry of Muslim Marriages (ROMM). Singapore's governance structure is widely recognized for its transparency, accountability, and efficient administration (Listiana, 2020).

Management Practices in India exhibit variations among institutions across states. Some states have reforms to enhance transparency and accountability. These include digitizing records and introducing online systems for property registration. However, challenges persist due to limited resources, bureaucratic inefficiencies, and political interference. In contrast, Singapore's Waqf institutions adhere to robust management practices (Hassan et al., 2017). MUIS has employed digital systems to streamline processes related to property registration, lease management, and financial reporting. The utilization of technology has bolstered efficiency and reduced administrative burdens. Moreover, Singapore's Waqf institutions benefit from professional management and expertise, ensuring the effective utilization of Waqf assets. (Mohammed et al., 2016).

Financial sustainability is a critical element of governance within the Waqf institution. In India, numerous properties belonging to Waqf have been subject to encroachment and illegal occupation, resulting in a decline in revenue generation. The poor maintenance and lack of investment strategies further impede the financial sustainability of these institutions. Moreover, the limited support from the government and insufficient awareness among the Muslim community present challenges to the growth and development of Waqf assets(Khan, 2014). Conversely, in Singapore, the financial sustainability of Waqf institutions is comparatively more stable. The Mosque Building and Mendaki Fund (MBMF), established by MUIS, serves as an endowment fund that ensures a sustainable source of income for mosque operations and various Islamic activities. This fund guarantees a steady stream of resources for the functioning and development of Waqf institutions(Mohammed et al., 2016).

Community involvement is crucial in the governance of Waqf institutions. However, in India, there is a lack of community participation in decision-making processes, which results in a lack of ownership and accountability. In order to preserve and effectively use Waqf properties, it is essential to involve local communities in their management. On the other hand, in Singapore, there is active encouragement of community engagement through various initiatives. MUIS organizes dialogues, seminars, and workshops on a regular basis to engage the Muslim community in matters related to Waqf management. This inclusive approach fosters a sense of ownership among stakeholders and promotes transparency in decision-making processes(Anwar, 2018).

The following is a comparison of waqf in India and Singapore

Singapore	India
<p>Majlis Ugama Islam Singapura: MUIS holds all waqf. The Ministry of Community Development Youth and Sports governs MUIS as a statutory board. Muslim Affairs is the responsibility of the senior minister.</p>	<p>The management of Awqāf is shouldered by the Ministry of Minority Affairs and a Central Waqf Council was set up for advising the Central Government on matters concerning the working of Waqf boards.</p>
<p>WAREES is the corporate name of MUIS's subsidiary company, Waqf Real Estate Singapore (MUIS). it has been operating. All baitulmal and waqf properties are managed by this organization.</p>	<p>State Waqf Boards established by state governments perform general superintendence of all Waqf assets in those states. Additionally, Central Waqf Council monitors the functions of State Waqf Boards.</p>
<p>MUIS responsible of waqf and zakat administration. In order to buy and develop waqf assets, numerous issues are discussed first at the directorate level, and then advanced for consideration at the MUIS council level. Then the Fatwa Committee hears shariah issues.</p>	<p>The Waqf amendment Act provides the Waqf council greater power of supervision over state Waqf boards. Disputes are referred to a Board of Adjudication constituted by the Central government.</p>
<p>MUIS has the responsibility to investigates (cross checks) the documents included with the factual assets of the waqf assets after the mutawwali completes the registration</p>	<p>Governance of waqfs are not just vested with the State boards, but it is shared with the Chief Executive Officer of Waqf, appointed by the Central government.</p>

application.	
It is the responsibility of Waqf administrative committee to report to MUIS to ensure transparency, and the MUIS publishes an annual report for the public.	It is the responsibility of mutawalli of waqf to report to waqf board to ensure transparency.

CONCLUSION

The purpose of this study is to compare the Waqf institutions in India and Singapore. Due to the existence of Waqf systems in both countries, Islam reached India much earlier than any other nation. Both countries have comprehensive legal frameworks governing Waqf institutions. However, India employs a decentralized model of governance for Waqf institutions, wherein each state is for its own Waqf Board and their administration. Conversely, Singapore adopts a centralized governance structure in which MUIS plays a pivotal role in overseeing and managing all Waqf properties. The management practices of Waqf institutions differ significantly between India and Singapore. In India, the effective management and maintenance of these assets face challenges due to the extensive number of Waqf properties and limited resources available. On the contrary, Singapore has effectively implemented efficient management practices such as professional property management and regular audits to ensure the optimal utilization of Waqf properties. Good governance relies heavily on mechanisms of transparency and accountability. In contrast, India has experienced instances of mismanagement and corruption within

certain Waqf institutions, underscoring the need for improved transparency and accountability measures. Singapore, in contrast, has enacted rigorous financial reporting requirements and regular audits to ensure transparency and accountability in the management of Waqf assets. However, in India, there is a lack of active community involvement in the management and development of Waqf properties. On the contrary, Singapore has established diverse programs and initiatives to engage the Muslim community in the decision-making process and foster their active participation in Waqf activities.

The effective management of Waqf properties relies on promoting and accountability. This objective can be accomplished through regular audits, adhering to financial reporting requirements, and utilizing technology-driven solutions for maintaining records and tracking assets. India and Singapore can mutually benefit from exchanging best practices in governing Waqf properties. Facilitating this can be achieved through bilateral collaborations, exchange programs, and platforms for sharing knowledge.

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