



# Political Systems

## A Comparative Study

**Pakistan Studies (HU-107)**

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# Political System

## Introduction

The fundamental definition of a political system, according to David Easton, can be described as the following: *"A political system can be designated as the interactions through which values are authoritatively allocated for a society"*. [1] However, this is a very basic idea of a much vast and complex structure which involves but not limited to decisions and impacts of the government on the general public as well as on the economy. A proper political system benefits the country as a whole with the effects ranging from the upkeep of law and order to a platform for the citizens to express their protests and complaints.

### • Functions

There are undoubtedly numerous responsibilities on a government that upholds and acts in accordance to a structured and well-defined political system. Even so, the major functions of such a system can be grouped into three major types:

1. Stabilize amalgamation of a society by setting a precedence for norms
2. Adjust and modify economic, social and religious structures to achieve long-term political goals
3. To maintain stability and integrity of the system itself from external threats

These can further be classified into the following sets of functions, as per *Eisenstadt (1966)*:

- Legislative
- Governance
- Administrative

Now that we have a somewhat general concept of political system, we shall move onto the types of political systems.

### • Different Political Systems

According to Edward Shills, political systems can be divided into three major types, that are stated and briefly described below:

#### ➤ Democratic System

Quite possible the most familiar political system is that of a democratic nature. The term *"democracy"* itself is originated from two Greek words, ***demos*** (people) and ***kratos*** (rule). Lexically, it means the ***rule of the people***. Comprehensively, it is actually a way of life in which people act freely within defined and socially accepted boundaries and norms. Whereas, contextually and in a political context, it is a system of administration in which people administrate themselves. They partake in the government by electing a

representative their own selves and uphold their own pronouncements. In short, ***“It is the thought of an equalitarian society put into effect.”*** [2]

### ➤ Oligarchic System

Governments where ‘rule by a few’ is prevalent, is of the Oligarchic form. In such a political system, Monarchy is a dominant and possesses the highest power over whole of society. To further elaborate on ‘rule by a few’, we look towards the government of United Kingdom. The *Royal* family enjoys *traditional authority* where the next ruler is the heir of the same bloodline.

It is, however, to be noted that the oligarchic systems present today are far different from the ones in ancient times. The ancient monarchy can be classified as ***absolute rule*** whereas gradually and over-time, it gave way to ***constitutional rule*** in which the royal family exercises little power and fundamentally serves a ceremonial and symbolic role.

### ➤ Totalitarianism

Such a term usually encompasses all those nondemocratic systems ruled by an individual/group of individuals that enjoy and exercise arbitrary power. The state controls all the parts of life and often perpetuate their power for conducting capricious programmes. It is the most abhorrent and acute form of *authoritarianism*. One may even define it as the complete polar opposite of democracy. The general public under this system is not allowed to dissent against the enforced rules. To sum it up, *“the state in this arrangement is embodied by a politically authoritative reigning class that rules all other groups.”*

We now proceed towards explaining the political systems in totality of our chosen countries, that are: Pakistan, United States of America, United Kingdom, France and Germany.

## Systems Implemented in Different Countries

### Political System of Pakistan

Pakistan is an Islamic and parliamentary state in which regional governments exercise a superlative order of independent and residual powers. Politics in this system proceed within the framework moulded by the constitution. Managerial power is restricted to the *national cabinet* (a formal body comprising of government officials chosen and directed by the Prime Minister) that functions articulately with the parliament and the judiciary. The *head of the state* is the president, appointed by electoral college. After the 18<sup>th</sup> amendment, the position

of presidency was deprived of most of its major powers and the government itself has altered an absolute parliamentary system from a semi-presidential system.

Political system of Pakistan is made up of three branches, namely:

- The Executive
- Legislative
- Judiciary

Following text explain these branches briefly:

### • Executive Branch

It consists of the two important figures of a state, the President and the Prime Minister. The **President** is nominated by the electoral college, encompassing members from the Senate, the National Assembly and Provincial Assembly. The tenure of this elected candidate lasts five years, after which he may be re-elected for another five years. However, no individual is permitted to serve the office twice, consecutively. Furthermore, elected candidate, in accordance, with the constitutional provisions must be a Muslim.

The **Prime Minister**, on the other hand, is appointed by the National Assembly based on votes. The said individual is aided by a Federal Cabinet, which consists of members that are appointed upon the advice of the Prime Minister himself. Multiple work affairs and business dealings come under the responsibility of the one who takes the oath of the office; However, we shall not dive into those matters as we are concerned with the framework itself.

### • Legislature

In Pakistan, this branch is of a dual nature; It is made up of the National Assembly (lower house) and the Senate (upper house). The President, alongside previously mentioned two houses, make up a separate body coined by the term '**Council of Advisers**'.

#### National Assembly

Members of this house are voted by the people at least of eighteen years. Population is the deciding factor on the distribution of seats in the provinces. Each member serves a parliamentary term; Five years of service unless they encounter difficulties continuing and resign, or the National Assembly as a whole is dissolved by the President. The national assembly has also reserved **5%** of the total seats for the minorities and seats specific to women are retained as well. Although, women are selected not through general elections, but directly by the party heads. The legislation of **financial bills** is also exclusive to this house. The number of total seats within the National Assembly is **342**. The composition of the Seats in this house explained through the following figure:

	Punjab	Sindh	Khyber Pakhtunkhwa*	Balochistan	FATA	Federal Capital	TOTAL
General	148	61	35	14	12	2	<b>272</b>
Women	35	13	8	4	0	0	<b>60</b>
Non-Muslims	-	-	-	-	-	-	<b>10</b>
<b>TOTAL</b>	<b>183</b>	<b>74</b>	<b>43</b>	<b>18</b>	<b>12</b>	<b>2</b>	<b>342</b>
* Former NWFP. Source: National Assembly Secretariat							

### ***Allocation of Seats in the National Assembly***

## **Senate**

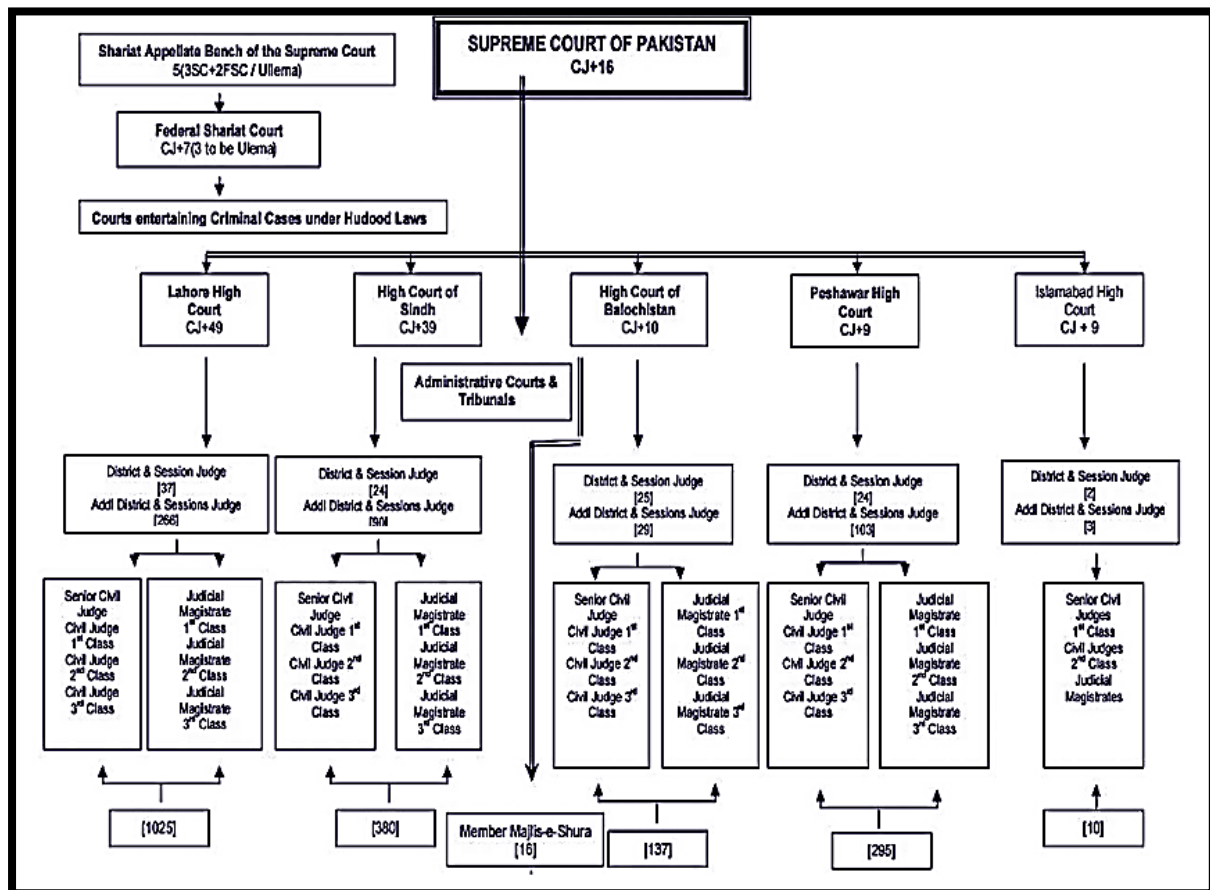
It is a permanent body of the legislature with equal representation from all the provinces. Members of this house are nominated by the respective assemblies at a provincial level. In case of presidential office being unoccupied, the chairman of the Senate is the individual with highest priority to act as a president until one is to be officially designated. Both the houses; National Assembly and Senate can instigate the legislation of a bill unless they are of financial nature. The President may impose a restriction on the passage of such a bill until unless the legislative branch as a whole overrules this decision on the basis of majority votes. Additionally, the President is not permitted to dismiss the Senate unlike the National Assembly. In total, the Senate has **100** members allocated as following:

Administrative Unit	General Seats	Seats reserved for		Total
		Women	Technocrats and Ulema	
Federal Capital	2	1	1	4
Balochistan	14	4	4	22
Khyber Pakhtunkhwa	14	4	4	22
Punjab	14	4	4	22
Sindh	14	4	4	22
FATA	8	-	-	8
<b>TOTAL</b>	<b>66</b>	<b>17</b>	<b>17</b>	<b>100</b>
Source: Senate				

### ***Allocation of Seats in the Senate***

## • Judicial Branch

The judiciary, in general, tends to comprise of the courts and their rulings for the civil and criminal affairs. Judicial hierarchy in Pakistan has the *Supreme court at the top of the chain followed by Shariah Courts, Regional/District Courts, Provincial High courts and lastly Civil/Magistrate courts*. As there isn't much of a difference between the court systems of all except the selected few, we shall explain only: **Supreme Court, Federal Shariah Court and Provincial High Courts**.



**Judicial Hierarchy**

### Supreme Court

Being the apex court of Pakistan, it is the final decision-maker of constitutional and legal disputes. It is made up of a **Chief Justice** and 16 judges or less. Judges are chosen based on experience; In order to be appointed as a judge in this court, one must have 5 years' worth of experience as a judge in a high court or 15 years' worth of experience as a high court's advocate. The **Chief Justice** is selected by the President himself whereas other judges are nominated after consultation with the said Chief Justice. An appointed candidate for Chief Justice may retain his position until of the age of 65. **'The Supreme Court has indigenous, appellate, and consultive jurisdiction.'** [3]

## Federal Shariah Court

Another key pillar of the judiciary is the Shariah court. It has eight *Muslims* jurists along with a Chief Justice elected by the executive. Out of the eight judges, three must be **ulema** proficient in Fiqah. ***'The Federal Shariah Court has indigenous and appellate jurisdiction.'*** It also has the duty to analyse and ensure that the constitutional laws do not violate the principles of Islam. *"The function of this court can also be described as duplicating the orders of higher courts and to maintain the sovereignty of the Parliament."* [3]

## Provincial High Courts

Provincial High Courts are the fundamental courts for each province. All four provinces of Pakistan possess a high court that have ***original and appellate jurisdiction***. Prior to the eighteenth amendment, the president elected the judges after discussing with the Chief Justice. Presently, there appointments are done solely by the Parliamentary Commission. In addition to these courts, special courts with set-specific cases also exist at the provincial level. *Appeals in such special courts go to High Court that exercise original and appellate jurisdiction*

## Mohtasib

An extended feature of the judiciary of Pakistan is the Mohtasib office. These offices were established in many states early on to safeguard the security of Muslims and that no wrongs and injustice may be delivered onto them. ***"At its core, it shortens the distance existing between the administration and citizens in order to improve developments and procedures implemented by the administration and to shun any mismanagement of discretionary powers."*** [3]

## Political System of United States

The United States follows a somewhat similar pattern to the structure of Pakistan on the outside. It is a federal constitutional republic based on democracy where reserved powers are divided among the President, Congress and Judiciary. Unlike Pakistan, the executive branch is controlled and acted solely by the president, without any intervention from the legislative branch. Legislature in the United States is further divided into two chambers of the Congress; *Senate and the House of Representatives*. Ever since the occurrence of *American Civil War (1861-1865)*, two political parties have dominated the American politics; namely, the Democratic and Republican party.

- **Federal Government**

It is a fundamental part of the politics of the US, determined by the federal unit. It is a very prevalent feature of the American governmental framework. It shares sovereign features with

the state governments and is made up of three distinct branches that are described in the following passages.

## • Executive

It bestows the President and the President alone with executive power, independent of Legislative powers. However, the Constitution still offers directives to the president to ***“take care that the laws be executed devoid of ill-will”*** and necessitates the president to take the oath to ***“preserve, protect and defend the Constitution of the United States.”*** The commander-in-chief is the president himself and has a wide authority over foreign relations and is exclusively responsible for it. The elected individual also has informal powers outside of the designated position power such as being *the leader of his political party*.

Another important figure of the executive branch is the Vice-president. The responsibilities and duties are decided according to the power administered to the individual by the legislature. Furthermore, the Vice president acts as the president of the Senate and within this capacity, he has the full right to exercise a *tie-breaking vote*.

## • Legislature

It is of bicameral nature, meaning it comprises and has principles of dual houses; namely, the House of Representatives and the Senate. Both these components have specific exclusive powers which they exercise and enjoy. As a single example among many, most of important presidential meetings to foreign countries must be approved first and foremost by the Senate. Whereas, the House is responsible for the initiation of the financial bills. *Both the chambers of the Congress are necessary for the passage of legislation, which only then is forwarded to the president for signature. If the president rejects the bill, Congress as a whole must pass the bill again, however, this time only 2/3<sup>rd</sup> majority approval of each chamber is required and not the signature of President.* The composition of the members in these chambers are explained in the following text:

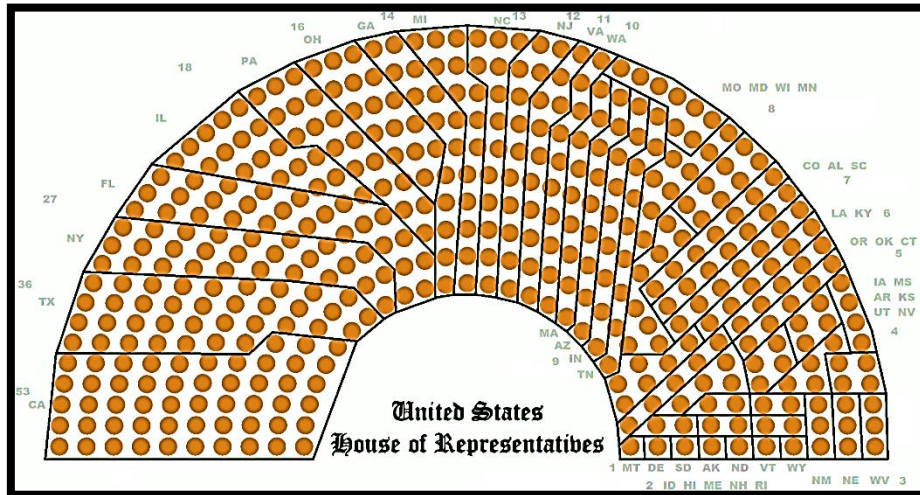
### 1. House of Representatives

Presently, it encompasses 435 members representing a congressional district, while being able to exercise their voting rights fully. All the members must serve a term of two years and each state must have at least one representative. In order to be eligible to get elected, following conditions are necessary to be fulfilled:

- Twenty-five years of age or more
- Spent at least seven years as a US citizen
- Presently living in representative state

Following figure elaborates on the grouping within House of Representatives based on the state:

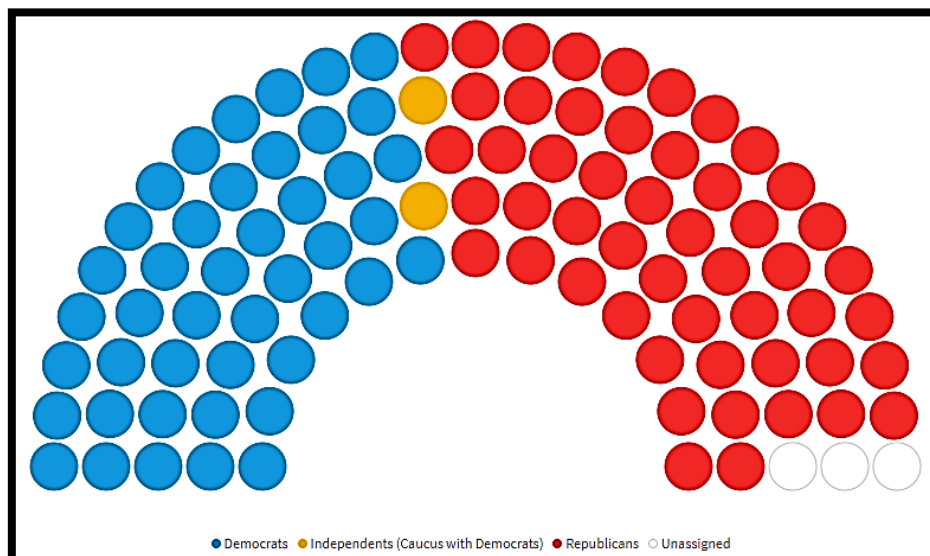




## 2. Senate

Contrary to the vast size of the House of Representatives, only two senators are present from each state without taking into account the population of the state. Presently, there are 100 members in the Senate of Congress with each senator serving a term of six years.

Following figure depicts the visual representation of the US senate in 2018:



## • Judiciary

The Constitution laid the basis of the existence of a Supreme in Court in the US through Article III – Section I, whilst also giving Congress the authority to develop lesser courts should there be a requirement for them. Federal judges are to be elected, as per Article II – Section II, on President's orders and then, further approved by the upper branch of Congress. The Judiciary of United States consists of, to-date: ***The Supreme court, 13 appeal courts, 2 courts of special jurisdiction and 94 district courts.***

- Supreme Court is responsible for resolving suits and controversial incidents persisting around the government, interpretations of the constitution and quarrels at a state level. It can also overrule the legislative and executive actions as **unconstitutional** and set a **new model** for further decisions revolving around the particular topic.
- *District* courts are a form of trial courts which file and deal with *suits that are relevant to and under the Judicial Code, in accordance to the jurisdictional principles laid in the constitution.*" [4]
- The *court of appeals* is fully oriented towards resolving and dealing with the appeals on the verdicts dealt by other courts such as district courts. Other than that, there are also direct petitions from business administrations. Appeals emerging from this court are ultimately dealt by the Supreme Court.

## • State Government

It has the right to exercise power over all the subjects that are not granted to the federal government or denied to the states in the Constitution of the US. Unlike the federal government, a state government can act with inherent powers unless restricted by the Constitution itself. State government, similar to the federal government, also has an **executive, legislative and judicial branch**. The only differences in the branches of the state and federal government are that the Chief executive of the state is an elected governor that serves a four-year term and the fact that Nebraska has a unicameral legislature. The rest of the details are more or less similar with different terminologies.

## • Local Government

Presently, a total of **"89,500 local governments, including 3,033 counties, 19,492 municipalities, 16,500 townships, 13,000 school districts, and 37,000 other special districts"** [4] persist in the United States. These governments are made directly to provide relief to the people ranging from police affairs to housing schemes, etc. For most states, cooperation with the state and federal government is of the utmost priority to meet the needs of the inhabitants. This forms the basis of City government which can be further classified into three general types:

### Mayor Council

Quite possibly the oldest form of government in the United States is of the Mayor Council. The structure and idea behind this are similar to that of federal or state government. The chief of the executive branch is the Mayor that gets elected through votes alongside with an elected council that forms the legislative branch. The mayor himself appoints the heads and other officials for specific departments throughout the city.

## Commission

This type of city government combines the executive and legislative branch into one identity which acts as the official body with three or more commissioners. Each commissioner is given the right to exercise and supervise the work of city departments and they also develop and implement policies in accordance with which the city runs.

## Council Manager

This existence of this concept originated as a direct reply to the ever-increasing complexities of the city problems that an elected public official may not be able to resolve or understand the nature of. Hence, most of the executive powers are entrusted to such a city manager that oversees *law enforcement and running of services*. There is no definite term duration of the city manager; the individual may serve however long he wants if the council is content with his work and achievements.

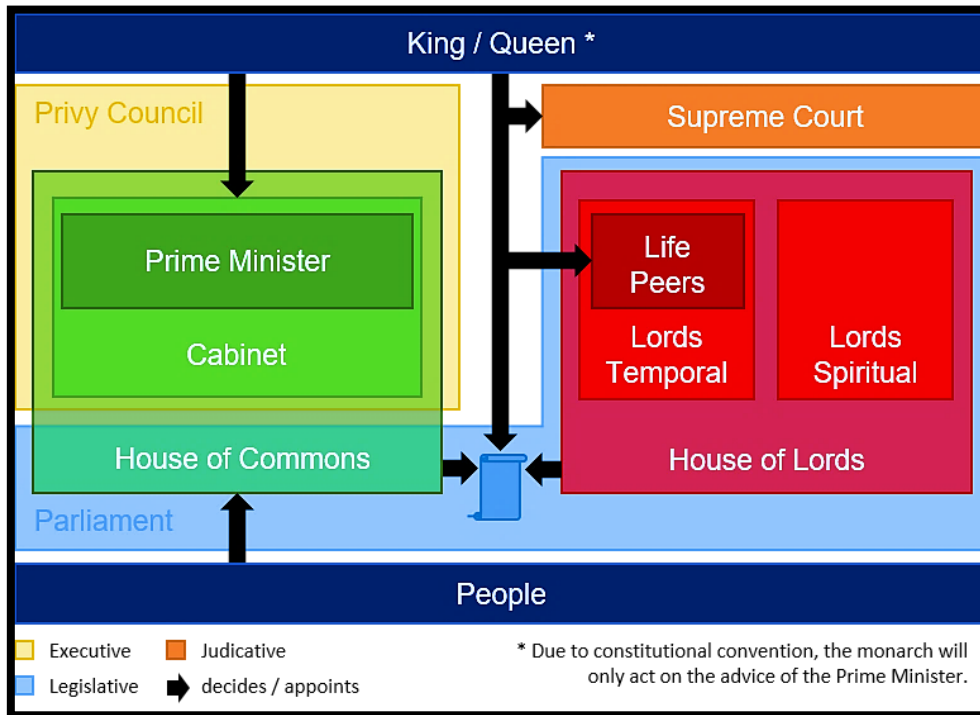
***It is to be taken into consideration that the aforementioned governments in itself are the unilaterally pure. Practically, many states often develop a blend and combination of two or three of them.***

## • Campaign Finance

The scale of US politics and election is second to none. One can even observe the large-scale effects of the elections on the globe as a whole on social media websites. It is of no wonder that participation in the elections require large sums of money, especially when it comes to advertisements on the television. *Although, ever since 2008 elections, both the republic and democratic parties have had success raising funds through the internet. Aside from that, both of these parties also depend on wealthy organizations; Democrats depend upon donations from organized labour whereas the Republicans rely on the donations from businesses.*

## Political System of the United Kingdom

Among our chosen five countries, the political system of United Kingdom is very different as they are based on constitutional monarchy rather than federal democracy. It is a unitary state in which the monarch is the head of the state and the prime minister is the head of the government. Despite being a monarchy system, the current Royal Family, on the surface, is nothing more than a symbolic and ceremonial role in the actual governance of the state. However, the monarch does have the royal birthright which may be exercised for multiple amounts of circumstances.



***Political System in the United Kingdom***

There are multiple layers to the political system of the United Kingdom which are explained in the following text:

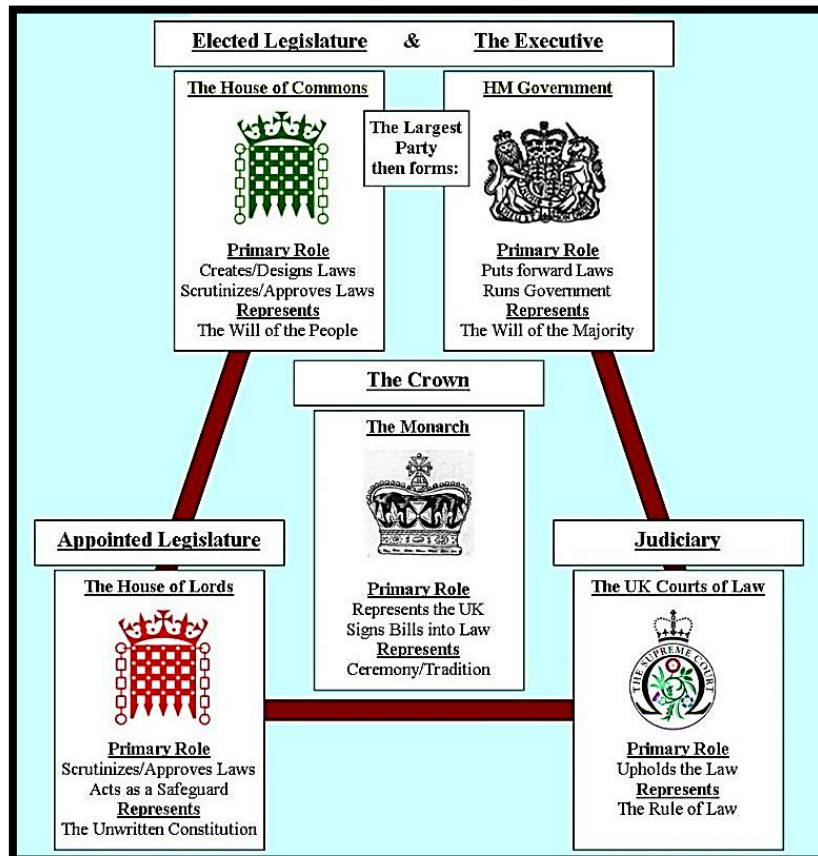
## • Crown

The Monarch of the United Kingdom, presently *Queen Elizabeth II*, leads the state. Albeit the recent monarchies have significantly reduced the extent of participation in the government affairs, it is still the source in which the total executive power lies. They reserve the right to utilize the royal prerogative which can be implemented for cases varying from the dismissing the prime minister to assertion of war, etc. The appointed minister is also required to have conferences regularly with the Queen to discuss any dissatisfaction, feelings on the overall status of the kingdom or to receive advices.

The Monarch of the United Kingdom has numerous domestic powers as well as foreign powers. Few of such powers are:

- *To dismiss or appoint a new prime minister*
- *To declare war and peace*
- *To recognize states*
- *To grant Royal Assent to bills, essentially making them valid*
- *To command the armed forces of the United Kingdom*
- *To deploy armed forced in foreign nations*
- *To grant honours (tradition)*

And so on and so forth.



***Separation of Power in United Kingdom***

## • Executive

Powers of executive nature are enjoyed and divided among the Monarch via the Government and the Devolved Administrations.

### Government of United Kingdom

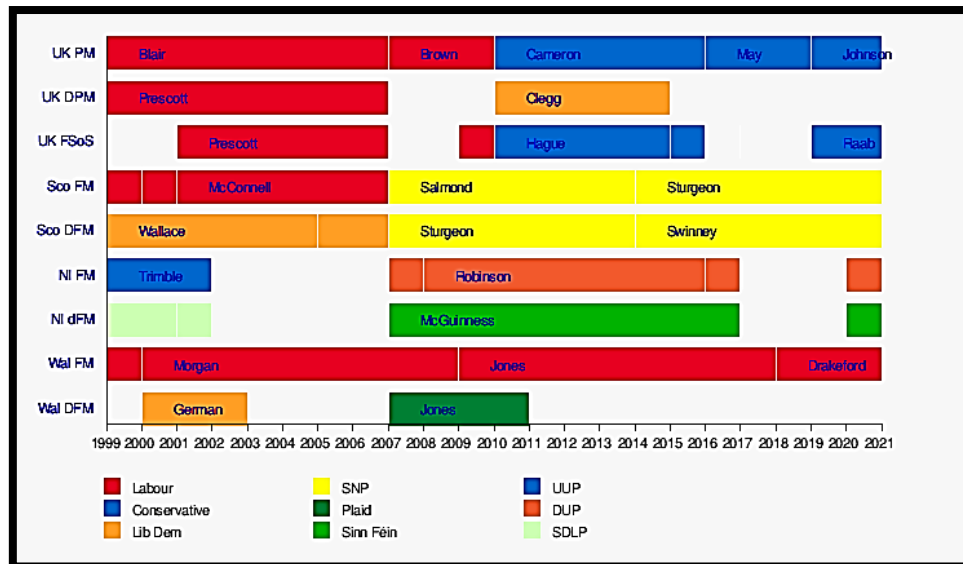
The Monarch, that is, by the Queen Elizabeth herself appoints the Prime Minister, in accordance with the strict convention that the elected individual must a member of House of Commons and likely able to form a government with the assistance of the House. Practically, the leader of the political party that is in the majority in the House of Commons is chosen to be the Prime Minister. If none of the parties are in complete majority then the leader of the largest party is given the initial opportunity to form an alliance.

The governmental policy is formulated by the **cabinet**; which is a special crew consisting of the prime minister as the senior most member that also appoints all other members of this cabinet. *“Gradually, this infrastructure became of what is now known as the executive branch of the government, as daily politics shifted in the hands of the constitution rather than the monarchy.”* [5]

The government also encompass **ministries** known broadly as departments. These departments, i.e. *Department of Health*, are run by a Government Minister that is often a member of the cabinet and secretary of the state.

## Devolved Administrations

The British government, although not exclusive to members in the kingdom, gives the authority of self-government under the statutory of **devolution**. The Scottish, Welsh and Northern Ireland have their own separate governments and are allowed to establish and implement their own rules and laws albeit restricted to those that comply with the principles of **Her Majesty's government**.



**Prime Ministers and Deputies since 1999**

## • Legislatures

The complete and definitive legislative body in the United Kingdom is that of the British Parliament. It is bicameral in nature consisting of two houses; that of Commons and that of Lords. Apart from this legislative branch, there are also *devolved* legislative bodies of Scotland, Welsh and Northern Ireland with a variance in authorities of legislative verdicts.

### 1. House of Commons

United Kingdom has a broadly equal division of population for parliamentary constituencies; done through the Boundary Commission of the four countries within the Kingdom. They elect an individual from the Parliament at general elections, to the Common House of Legislature. In 2010, there were 650 such constituencies in the United Kingdom, in which all but one got selected as representative of some specific party.

In the recent years, all the Prime Minister have been selected from the House of Commons and not from the House of Lords. A two-party system is observed in the parliament, that is, a single political faction generally has a majority in the parliament.

### 2. House of Lords

After extensive reforms in 1999, it presently encompasses two types of members. **Lords Temporal**, that are appointed members with no hereditary rights for their



descendants in the Lords' house, and **Lords Spiritual**, that represent **England's Church** and are elected by the former holders of titles, essentially giving them hereditary privileges. The Supreme Court replaced this house in dealings of civil cases in 2009.

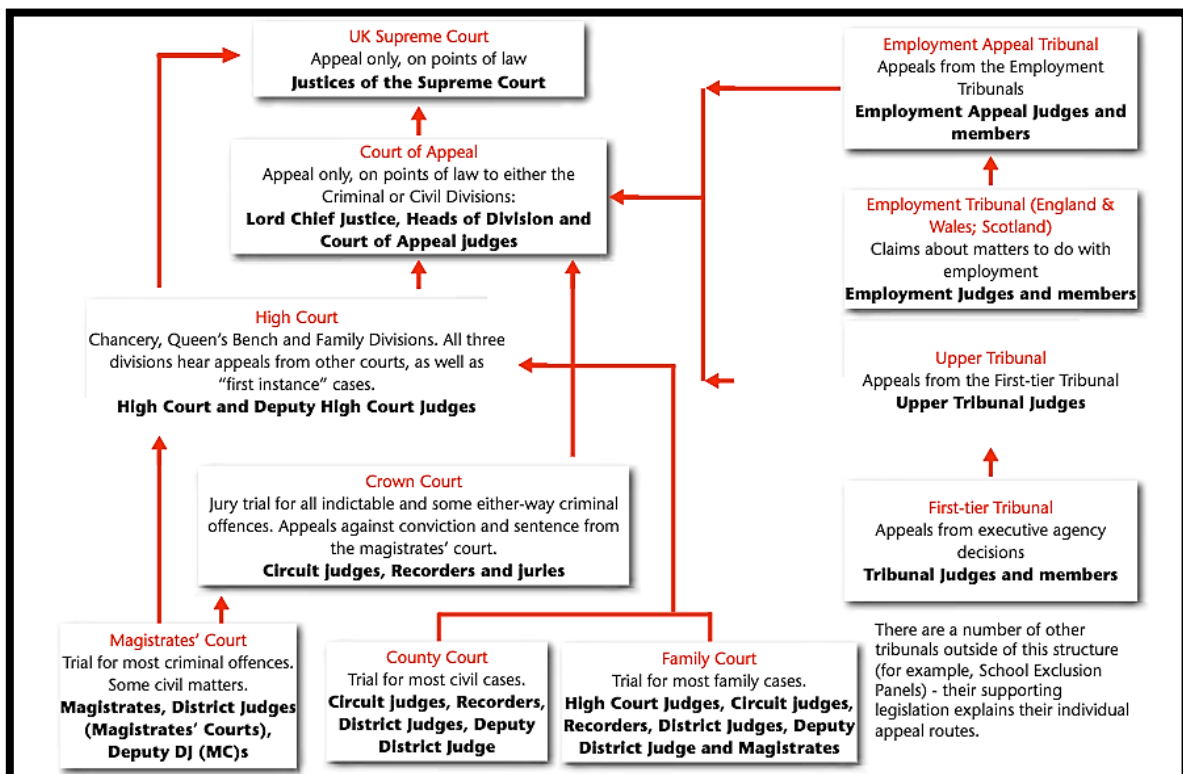
## Devolved Legislatures

Apart from the sovereign parliament, these exist the devolved parliaments of Scotland, Wales and Northern Ireland. These have varying powers to their names that can be broadened or narrowed by the Act of the British Parliament at any time. **England**, however, is the sole country in the kingdom that does not have a devolved parliament of their own, and is thus governed in accordance with the balance amongst the other members of the kingdom.

Although several groups are pressuring and calling for a devolved parliament for England, the government does not seem to have any plans for that. The major argument of these pressure groups is pertaining to issues related to inconsistency in voting. An example symbolizing this irregularity can be simulated as: a *Scottish MP being able to vote and alter the legislation that only affects England*; however, the opposite is not permissible. This particular dilemma is referred to as the **West Lothian Question**.

## • Judiciary

UK does not have a solitary judicial system as the state itself was created as a result of political union among formerly independent countries. The structure of courts followed in the UK can be inferred from the following chart:



**Structure of Courts**

As this treaty assured the existence of a separate legal system of Scotland, presently there are three distinct and structures judicial branches in the United Kingdom: **English Law, Scots Law and Norther Ireland Law.**

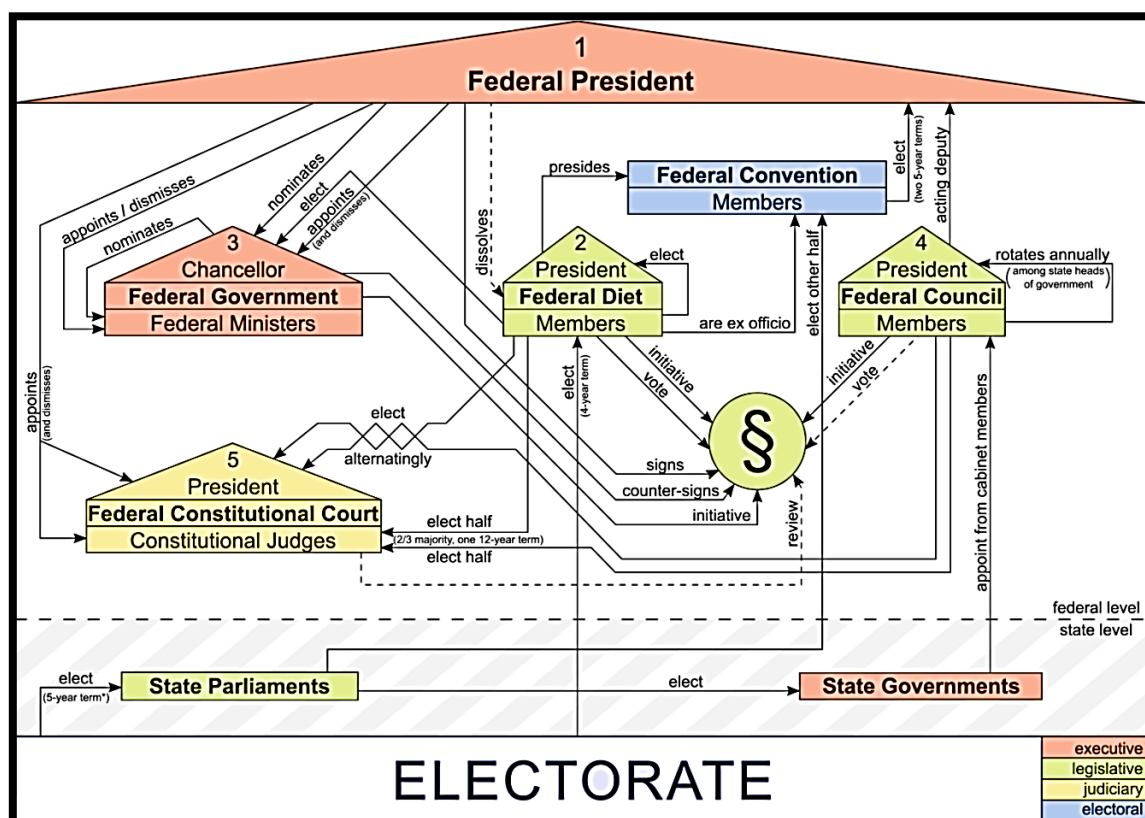
It is to be noted that the Judicial Committee of Privy Council, consisting of the same members as the Supreme Court, is the superlative court of appeals for several Commonwealth countries, Crown dependencies, etc.

### Applicability

The English law, which applies to both England and Wales, along with Norther Ireland Law, are based on **common-law** principles. Whereas, the Scots law which is applicable to Scotland only is based on a mix of **common-law** and **civil-law** principles.

## Political System of Germany

Fundamentally, the republic of Germany is parliamentary and democratic in nature. The legislative powers are exercise by the parliament (**Bundestag**) and the representative body of regional states, **Bundesrat**. The judiciary is completely autonomous and free of intervention from the other two branches of government; as quite commonly, we observe that the elected members of the executive serve an active part in legislature as well. “In 2019, the *Economist Intelligence Unit* regarded the republic of Germany a ‘full democracy’.” [7]



Political Structure of Germany



## • Executive

The executive branch of the political infrastructure of Germany consists of three bodies: Federal President, Federal Government and State Governments. Following writing expresses and describes these branches briefly.

### Head of State

The Federal President is the head of the state and mostly serves a ceremonial rule, while the Federal Chancellor runs the government and the daily politics throughout the whole country. The head of the state, through actions and presences, represents the state itself and the whole of its unity. Most if not all actions of the president become lawful only after a countersignature of a member of the government.

The president is generally expected to give a general suggestion and direction to the societal and political debates but not in a manner that may link him directly to the parties. The said individual, while not given the rights to *veto*, must sign a federal law and bills for them to come into effect and this subject is rather debatable that on what basis the President may refuse to sign a law.

### Head of Government

Federal chancellor leads the federal government, as stated earlier, and henceforth, the executive branch as a whole. Called ***Bundeskanzler*** in German, the federal chancellor cannot be removed from the four-year term unless the *Bundestag* passes a vote of no confidence, that is, a prospective successor has a majority vote to take stead of the former chancellor.

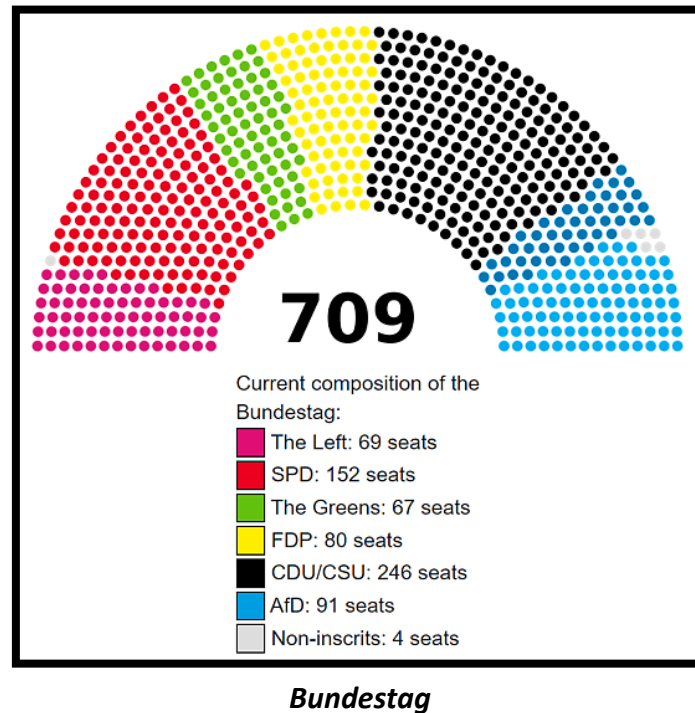
The chancellor along with the cabinet ministers form the Cabinet which intrinsically lead all of the country with set-specific fundamentals.

## • Legislature

The legislative power in Germany is split among the *Bundestag* and *Bundesrat*. The members of Bundestag (Parliament) are directly elected by the German citizens whereas the Bundesrat embodies the regional states of Germany. Practically, the agreement of both the Bundestag and Bundesrat is essential for the legislative process.

### Bundestag

The members of this house are elected for a term of four years through different electoral systems, and is the sole federal body elected by the general public. It is in many ways comparable and similar to the [House of Commons in the United Kingdom](#) or the [House of Representatives in the United States](#). Voters must be over the age of 18 for validity and the elected members are 709 in number which and are only accountable by their electorates and non-held restricted in any other manner. It has several functions and once combined with *Bundesrat*; they form the legislative branch of government. The following figure visualizes the composition of Bundestag:



## • Judiciary

The Judiciary branch of Germany follows a traditional civil law legal system. That is, there are mainly three classifications of courts in Germany:

1. Courts that are ordinary in nature deal with civil cases and are also the most prevalent across the country. ***The highest ordinary court and subsequently, the highest court of appeals in German judiciary is Bundesgerichtshof.***
2. Specific courts that pertain to cases, as the name implies, relevant to administrative, labour, patent and fiscal law.
3. Constitutional cases that solely focus on judicial and constitutional review and validity.

## • Länder

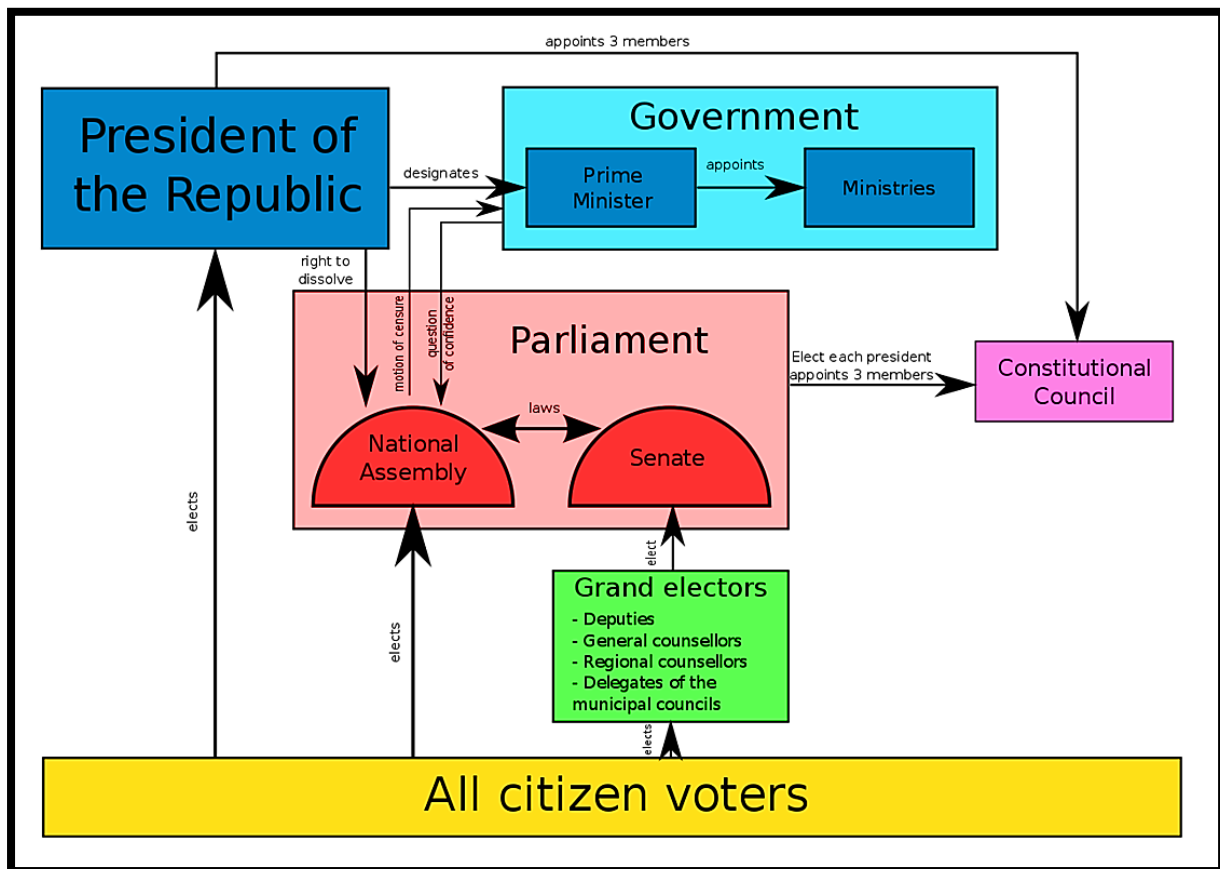
There are sixteen states in Germany, with each having different administrative policies and divisions and are collectively coined under the term Länder. As the state of Germany as a whole was formed from former several independent states, the constituent states have and retain a significant measure of sovereignty.

***“As of 2009 Germany is divided into 403 districts (Kreise) on municipal level, these consist of 301 rural districts and 102 urban districts.”***

## Political System of France

The republic of France abides and practices politics in framework of a semi-presidential system. That is, it consists of a president alongside a prime minister and with a cabinet. In this system, the president is more than a ceremonial figure and overlooks certain policies exclusive to him. The nation describes itself as an indivisible, democratic, secular and a social

republic. The political framework of France is divided into three branches; Executive, Legislature and Judiciary with different responsibilities assigned to different positions that we shall discuss in the following texts. The state is also identified as a unitary state implying that the central government alone has the ultimate rights to exercise power.



*Institutions of the Fifth Republic*

## • Executive

As stated earlier, the state has a semi-presidential political structure. Executive powers are enjoyed by both the *President* and the *Government*. The Government consists of the Prime Minister, appointed by the president himself, and other ministers. The Prime Minister looks over the Parliament which further is comprised of the National Assembly and Senate.

***“When the President's political party or supporters control parliament, the President is the dominant player in executive action, choosing whomever he wishes for the government, and having it follow their political agenda.”***

On the other hand, the president's dominance is severely restricted if the Parliament is comprised and controlled by the opponents, as in opposing party to the presidential candidate.

Prior to 2002, the President served a term of seven years that made cohabitation possible, however, the tenure of both the President and the National Assembly as of today is of five years. Alongside this, the respective elections differing only by a few months, it is extremely unlikely for ***cohabitation*** to occur between the *President* and the *Prime Minister*.

## Government

This sub-branch of the Executive is led by the Prime Minister comprising of **junior & senior members**. Civil services, government agencies and military forces are operated under direct supervision of this branch of the executive. The National Assembly of the Parliament owes explanatory rights of the Government and they may dismiss and impose the existing government to resign. This, in effects, means that the same political party is projected on the Prime Minister as the majority in the Parliament.

Ministers of government cannot pass a bill without the approval of the Parliament, however, since both these branches are mutually politically allied due to the aforementioned ability of the Parliament to dismiss the Government, the proposed legislation is very likely to pass. Albeit, this is not always the case as the judgement of the Parliament may differ from those of Executive branch which ultimately leads to major amendments. Weekly meetings are held in the government usually led by the President. *The government plays a prominent part in formulating the overview of the Parliament as well as proposing laws and amendments during said meetings.*

### • Legislature

The legislature of France is mainly controlled by the Parliament which further is made up of two houses, the National Assembly and the Senate. The government although does not directly exercise legislative powers but do affect the legislature as a whole due to formulating the overview of the Parliament.

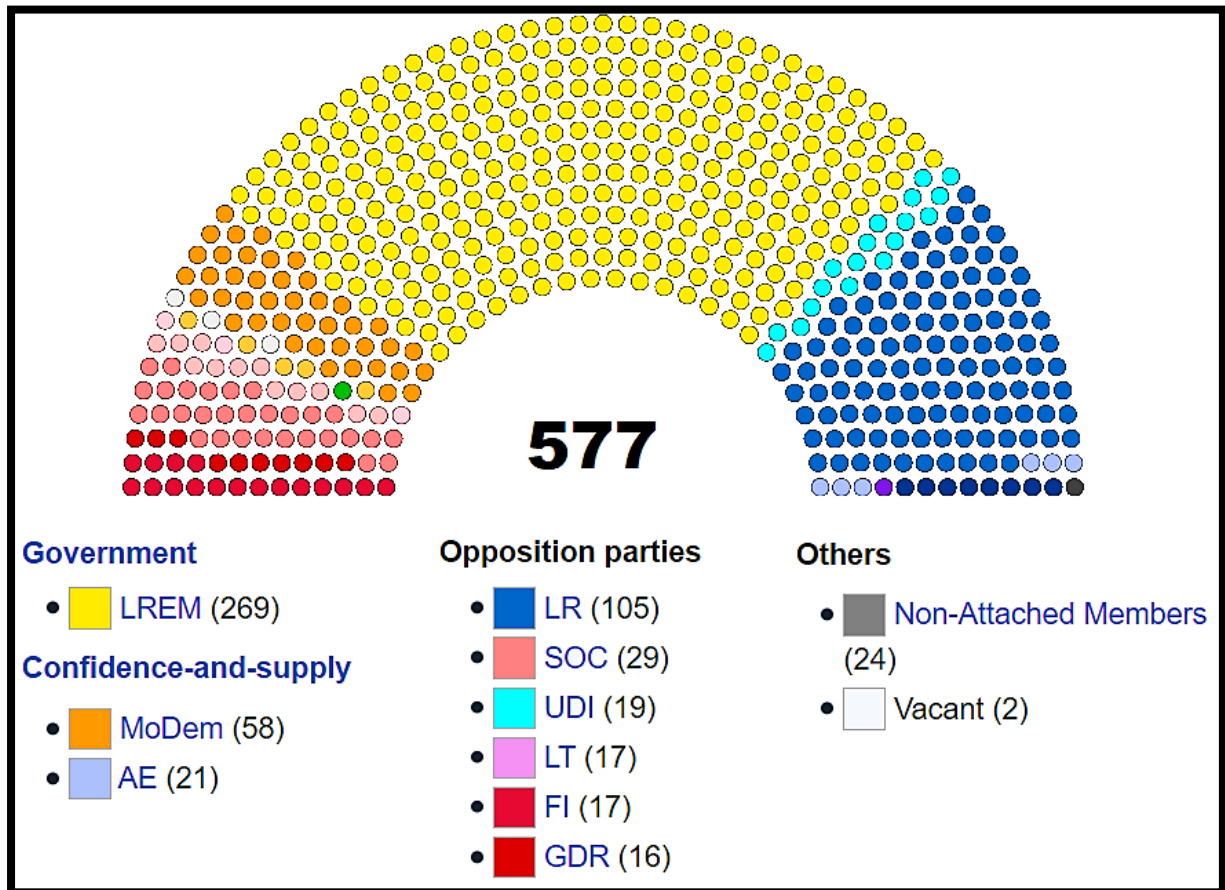
## Senate

Despite being a primary body of legislature, its powers are somewhat limited and the lower house usually has the last say in case of a disagreement should it arise at any point. Members of Senate are elected by an electoral college which is essentially made up of elected local officials, 165,000 in number. The members are coined under the term Senators and serve a term of **six-years** while **half** of the Senate is swapped by newer members every three years. Prior to 2004, the members of Senate were chosen for **a term of nine years** and re-elected **1/3<sup>rd</sup>** every three years.

***There are currently 348 senators: 326 represent the metropolitan and overseas departments, 10 the other dependencies and 12 the French established abroad.*** [8]

## National Assembly

It is a principal legislative entity with each member within it being directly elected by majority citizen voters and serve a term of five-years. The total numbers in this body is 577 and collectively, they may exercise their power to dissolve a Government through voting a **motion of censure**. This essentially lays down a basis for a guarantee of *cohabitation* to occur among the President and the Prime Minister since they're politically allied. The composition of National Assembly is pictured in the following figure:



***Composition of National Assembly***

## • Judiciary

French judicial branch is based on *civil-law system* and is affected by or responsible to the other two branches of government. A distinctive aspect of the French judiciary is that it is split into two definite streams; judicial affairs and administrative affairs.

### Judicial Courts

This branch of courts is responsible for handling criminal and civil cases and is made up of lesser courts, transitional of courts of appeal and the Supreme court. *A full court is made up of a panel of 3 judges and 9 jurors who together administer a verdict on a particular case.* Judges in these courts are employees of the government and are given an exclusive statutory security from the Executive branch of France.

### Administrative Courts

Such a stream of court deals with cases and lawsuits against government organizations. It consists of administrative and administrative appeal courts, and as a final defence, the *Council of State*. This council listens to appeals against the executive decrees and may set aside orders that breach constitutional laws.

## Financial Courts

Financial courts in France, ***Cour de Comptes*** and other regional audit courts refer towards managing financial aspects of the government, public entities and public institutions. An annual report is finalized by these courts and can also directly fire civic accountants for mismanagement of funds. Although they do not directly refer to accounts of private institutions, they may inspect their accounting under some circumstances. All the financial aspects of judiciary as a whole is supervised by the financial commissions of the French Parliament.

# Summary & Comparison

Now that we have covered the brief explanations of the political framework of the selected five countries, a comparison of the aforementioned countries can be discussed in terms of the fundamental three branches of any political system; namely the Executive, Legislature and Judiciary. Following tables give a comparative and brief overview of the information mentioned in the previous sections.

Countries	Executive Branch
Pakistan	Two major figures, the President and Prime Minister are elected and serve their term. Since the political system of Pakistan is based on parliamentary constitution, the Prime Minister enjoys significantly more power.
United States	Consists of only the President elected by the majority of US citizens and the supreme power lies within him, however it is different from an oligarchic government as the president is held responsible for his action by the Parliament and Judiciary.
United Kingdom	A constitutional monarchy is laid out in the United Kingdom, that is, a Prime Minister is also present alongside the Monarch. The Prime Minister is responsible for day-to-day politics and the Monarch serves at core a ceremonial role, although not devoid of powers.
Germany	The executive branch of Germany consists of two main figures, the President and the Chancellor. The chancellor is mainly responsible in handling the government and the role of President is somewhat similar to that of the system in Pakistan.
France	Another system that is quite similar to Pakistani political system, it has both the President and the Prime Minister. The powers both enjoy are somewhat similar as well as the election process.

Countries	Legislative Branch
Pakistan	Pakistan has bicameral legislature with the lower house, National Assembly exercising more power than the upper house, Senate. Members of national assembly are directly elected from the general public; however, bills and regulations still need to be agreed upon by both the houses of parliament before they can come into effect.
United States	United States of America also has a bicameral legislature and is similar to an extent to the Pakistani legislative branch. As a whole, it is coined under the term Congress and comprises of House of Representatives and the Senate. The state being a Presidential constitution in nature reflects in their Legislature and the House of Representatives arguably higher priority than the Senate.
United Kingdom	Being the only constitutional monarchic political framework among our chosen countries, it has the most distinct legislature. The monarch appoints the Prime Minister solely and the Parliament is then further divided into two houses; of Lords and of Commons. The Commons is generally the House from which the Prime Minister is elected from.
Germany	The German legislative system consists of two branches, the Bundestag and the Bundesrat. The former is elected by the German citizens directly and in fact, is the only political body that the people elect at a federal level. It also enjoys more power than Bundesrat although the approval of both is usually required for a bill to come into effect.
France	The Legislature of France is very similar to that present in Pakistan or the United States. The Parliament of France also has the National Assembly and the Senate with members of the lower house directly elected and enjoying more power than those of Senate.

Countries	Judicial Branch
Pakistan	The Judicial branch of Pakistan is to an extent independent from the other two branches. The court with the highest order in Pakistan is the Supreme Court and verdicts from this court cannot be subject to appeal. District and High courts are also built for cases that require lower attention.
United States	United States of America has a similar judicial system to that of Pakistan. The Supreme Court of US has the highest order of saying in appeals and adheres to cases that appeal or object at a federal level. Other courts also exist at a State level such as district courts and court of appeals.
United Kingdom	Due to existence of devolved states, the Judicial branch is also independent of the judiciary among one another but not by the Supreme Court. The supreme court oversees the proceedings in each individual judiciary. Apart from these, magistrate and crown courts also exist.
Germany	In the German judicial hierarchy, Constitutional courts are at the very top and have complete sovereignty and the highest precedence in administered verdicts. Ordinary and set-specific courts also exist making the judicial system of Germany one of the most successful to date.
France	Two streams of court are in effect in France, namely Judicial and Administrative streams. Judiciary in France, like in Pakistan, is tended to keep it as independent from the other two branches as possible. It is in many ways similar to the systems present in that of US and Pakistan, as presence of the Supreme Court is also observed here.