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PARLIAMENTARY ADMINISTRATION AS AN OBJECT OF COMPARATIVE LEGAL-POLITICAL RESEARCH

Annotation

This article explores the concept of parliamentary administration in political science, emphasizing its role in facilitating governance, policy implementation, and the accountability of elected officials within parliamentary systems. It discusses the interaction between the legislative, executive, and judicial branches, highlighting how parliamentary committees oversee executive actions and ensure transparency. The necessity of coalition governments, illustrated through examples like Israel's Knesset, is examined alongside the theoretical frameworks underpinning parliamentary systems, such as majoritarian and consensus models. The article also traces the historical evolution of parliamentary governance from medieval England to modern adaptations, underscoring the ongoing balance of power between legislative and executive branches. Ultimately, it argues that understanding these dynamics is crucial for analyzing the effectiveness and resilience of parliamentary democracies, especially in fragmented environments.

Keywords: parliamentary administration, legislative body, executive branch, judiciary, accountability, coalition governments, bureaucratic efficiency, majoritarian model, consensus model, historical institutionalism.

Introduction

In political science, the phenomenon of parliamentary administration refers to the process and institutional framework whereby a parliamentary system operates. It encompasses the interaction and cooperation between the three branches of the government (legislative body, the executive branch, judiciary) and various administrative agencies. The aforementioned concept highlights how a parliamentary system manages governance, policy implementation, as well as the relationship between the elected officials and civil service. The primary role of parliamentary administration is to facilitate the legislative process, which includes the process of enacting laws and overseeing the government activities. The necessity and crucialness of parliamentary administration in shaping the public policy and holding the executive accountable were well described in Lijphart's "Patterns of Democracy".

Regarding the spectrum of responsibilities, legislators' obligation is to question executive officials, including the head of the government and the cabinet of ministers regarding their policies and decisions. Such practice is done in order to foster direct accountability and allows public scrutiny. In addition to its general obligations prescribed by the constitution of the country, the legislative body has parliamentary committees which oversee the actions of the executive. Those committees conduct inquiries, gather evidence, and report on government activities, ensuring that executive actions are transparent and justifiable. Elected officials have rights to question expenditures during the sessions and prioritize funding based on public needs. The committees are formed from the elected deputies, who in addition can hold votes to express confidence; meanwhile the loss of confidence may lead to the resignation of the government reinforcing the idea that the executive must maintain the legislature's support.

At the same time, in many parliamentary systems, the need for coalition governments necessitates a complex administrative approach to governance. The most prominent example is the parliamentary elections in Israel. For PM Benjamin Netanyahu and his party "Likud" was essential to form a coalition

in order to secure a majority in Knesset. The necessity and vital importance of forming coalitions was discussed by Tsebelis in "Veto Players: How Political Institutions Work". In his book, the author explains that coalitions are formed due to negotiations and compromise between the parties. However, the most important part regarding the functioning of parliamentary system, was discussed by Pollitt and Bouckaert in "Public Management Reform" who touched upon the bureaucratic efficiency and effectiveness. Those two components as a functioning mechanism serve as a vital instrument for successful operation of parliamentary system. Meanwhile, the interaction between parliament and other governmental institutions (e.g., judiciary, executive) plays a critical role in the overall functioning of parliamentary administration.

Peculiarities of the parliamentary governance model

Parliamentary system is an important subject of examination, especially in political science as it represents distinct approach to governance, which slightly impacts the stability, representation and accountability. The purpose of this article is to examine the key features of parliamentary systems, what impact they have on dynamics, and their advantages and challenges. In contemporary reality, nearly every state has a parliament either bicameral or unicameral, which makes the examination of legislative branch a prominent task. According to Inter-Parliamentary Union, today 190 states (member-states of the United Nations) have national parliaments, 78 of which are bicameral and 112 are unicameral. Parliamentary systems are characterized by the fusion of executive and legislative powers. In this system the executive deals with an issue of dependency from legislative branch in order to get necessary support and remain in office. Such a model of governance contrasts with the presidential system, where the executive acts independently from the legislator. Such a model of governance contrasts with the presidential system, where the executive acts independently from the legislator.

 $^{^{1} \}textbf{Inter-Parliamentary Union,} (2024). \ National Parliaments. \underline{https://www.ipu.org/national-parliaments\#: ``:text=Parliamentary%20systems%20fall%20into%20two,some%2044%2C000%20members%20of%20parliament.$

² **Lijphart, A.** (1999). Patterns of Democracy: Government Forms and Performance in Thirty-Six Countries. http://digamo.free.fr/lijphart99.pdf

³ Shugart, M. S., & Carey, J. M. (1992). Presidents and Assemblies and Parliamentarism: Con-

In this structure, the system itself fosters collaboration and negotiation among the parties, otherwise the decision-making process risks to halt, or in another scenario, the party may form a coalition and secure majority in the parliament in order to pass bills, decisions and laws which will make their work easier. Based on his extensive analysis of diverse models, Lijphart categorized parliamentary democratic systems into majoritarian and consensus models.¹ Majoritarian model emphasizes the principle of majority rule which basically means that the party or a coalition that secures the most votes in the legislature forms the government, the similar scenario occurred in Israel during the legislative elections of 2022, or in India in 2024.2 While, Lijphart argues that parliamentary systems generally promote consensus-building, the separate examples in the face of Armenia, India, the UK, New Zeeland and Australia show that majoritarian model at first is a widespread phenomenon in parliamentary systems, the state owns a strong executive branch, and thirdly, the system is transparent. In case of majoritarian rule, the electorate clearly knows what force is responsible for failure.

While, the consensus model prescribes broad agreement and collaboration among different parties and aims to make the decision-making process more inclusive.³ However, Lijphrat bypasses the fact that consensus model typically results in coalition governments where diverse parties negotiate to form a stable government, which prescribes power sharing among different political powers as well as requires compromises and strong cooperation. Moreover, the reliance on inclusivity may result in slowing down the legislative process, as consensus must be sought. At the same time, strong emphasis on representing the broad scope of interests may result in a fragmented political landscape, where many

¹ **Lijphart, A.** (1999). Patterns of Democracy: Government Forms and Performance in Thirty-Six Countries. http://digamo.free.fr/lijphart99.pdf

² Ibid.

³ **Dahl, R.** (1998). On Democracy. Yale University Press. https://newuniversityinexileconsortium.org/wp-content/uploads/2022/08/Robert-A.-Dahl-On-Democracy-1998-1.pdf

small parties may influence policy. A good example is Belgium with its strong regional parties. Flemish Liberals and Democrats (Open VLD) and Francophone Liberal Reformist Party (MR) often dominate in Flanders and Wallonia. Due to fragmentation, no single party can achieve a majority in the federal parliament, which subsequently leads to the necessity of forming a coalition government. Due to complex process of negotiations, forming a government can last for several months; in addition, small parties may wield slight influence in coalition negotiations, which leads to policies that reflect wide range of interests.

However, the primary advantage of parliamentary system lies in its potential for stability. These systems allow to facilitate the formation of the government, by giving multiple parties a platform for negotiations, which in theory may lead to more stable and representative governance, compared to often-polarized outcomes that are seen in presidential systems.² The possibility to negotiate and form a coalition may prevent the marginalization of smaller parties and promote more inclusive political discourse.³ This flexibility may enhance the responsiveness of the system and ensure that governance aligns with the preferences of the electorate. For instance, during the elections of 2021 in Bundestag the Social Democratic Party, the Greens, and the Free Democratic Party managed to successfully negotiate and form a coalition government.⁴

Another important feature of parliamentary governance is the accountability. In order to remain in power prime minister and the cabinet must maintain the confidence of legislative body. This direct accountability sometimes results in greater responsiveness to constituents' need and demands.⁵ Taking into consideration that the government may be dismissed by a vote of no confidence,

¹ **Sente, Ch**. (2019). Belgium: a fragmented parliament. https://feps-europe.eu/belgium-a-fragmented-parliament/

² **George, T.** (2002). Veto Players: How Political Institutions Work. http://nzaher710.free.fr/coursLSES/poltique.pdf

 $^{^3}$ Pollit, C. & Bouckaret, G. (n.d.). Public Management Reform. $\underline{\text{http://ndl.ethernet.edu.et/bit-stream/123456789/40090/1/102.Christopher\%20Pollitt.pdf}}$

⁴ **Global Data On National Parliaments,** (2022). German Bundestag Election Results. https://data.ipu.org/parliament/DE/DE-LC01/election/DE-LC01-E20210926/

⁵ **Shugart, M.S.** (2008). Comparative Executive–Legislative Relations. https://calgara.github.io/Pol1 Fall2017/Shugart%202016.pdf

the potential of frequent evaluation of the government's performance may foster a culture of accountability and responsiveness. Importance and strength of accountability, and the consequences of its loss were vividly shown to the world for instance in 2012, when PM Julia Gillard faced no-confidence motion initiated by the opposition parties due to their concerns over her government's mismanagement of the economy and the introduction of the carbon tax. While the motion was defeated, it highlighted the issues of accountability and trust of her government.

Nevertheless, despite its benefits parliamentary system is not without challenges. Critics like Katz and Meir argue that reliance on coalitions may lead to unstable government, especially in fragmented systems, which in its turn will result in frequent elections and shifts in policy directions. Such instabilities can frustrate voters and lead to disillusionment within the political process. Furthermore, it is important to mention that coalition governments may prioritize compromise over decisive actions, which may hinder effective governance in times of crisis. For example, in 2011 the government of Berlusconi faced serious challenges during the European debt crisis, as his coalition tried to enact necessary reforms, while constantly struggling to reach a deal with the coalition partners. Especially this ineffectiveness resulted in instability and his resignation.

Theoretical framework

Theoretical framework for understanding the key peculiarities and features of the parliamentary system draws upon several theories that are widespread

¹ Ibid.

² **The Guardian**. (2013). Julia Gillard ousted as Australia prime minister. https://www.theguardian.com/world/2013/jun/26/julia-gillard-australia-prime-minister-kevin-rudd

³ Ibid.

⁴ **Katz, R. & Meir, P.** (1995). Changing Models of Party Organization and Party Democracy: The Emergence of the Cartel Party. https://dl1.cuni.cz/pluginfile.php/1783574/mod_resource/content/1/Katz_Mair_Changing%20Models%20of%20Party%20Organization%20and%20Party%20Democracy.pdf

⁵ Ibid.

⁶ Sachi, S. (2018). The Italian Welfare State in the Crisis: Learning to Adjust? https://www.tandfonline.com/doi/epdf/10.1080/13608746.2018.1433478?needAccess=true

⁷ Ibid.

in political science, which also elucidate the structure, function and dynamics of the parliamentary system. Those theories integrate theories of democratic governance, accountability coalition governance, and interplay of historical and social factors that shape parliamentary practices.

While talking about parliamentary governance, the first that should be referenced is the democratic theory. It serves as a foundation for analyzing parliamentary systems. Prominent thinkers like John Locke and Montesquieu argued for a government model that derived its legitimacy from the consent of the governed, establishing a social contract that underlines the importance of representative institutions. Democratic theory is pivotal to understand how parliamentary systems function as mechanisms to facilitate the democratic governance and enable elected representatives to enact laws and hold the executive accountable. Meanwhile the emphasis on popular sovereignty also ensures that parliamentary administration remains aligned with public interests, thereby fostering legitimacy and trust of governmental institutions.

Simultaneously, classification of democratic systems into majoritarian and consensus models allows to examine the dynamics of parliamentary governance through a critical lens. Majoritarian model is characterized by a strong control of the party over the affairs and the formation of governments by the party or coalition with the most votes, which in turn may lead to the marginalization of smaller groups and limit pluralism.² At the same time, the consensus model puts an emphasis on broad coalitions and inclusivity, and fosters collaboration among different actors.³ This model enhances representation of different groups but as it was mentioned above, it leads to the fragmented governance and a slow decision-making process.

Coalition governance theory is particularly relevant in the context of parliamentary administration, that requires multiple parties to form a government. Dahl highlights that negotiation process and power dynamics

¹ **Stanford Encyclopedia of Philosophy**. (2020). Locke's Political Philosophy. https://plato.stanford.edu/entries/locke-political/

² **Lijphart, A.** (1999). Patterns of Democracy: Government Forms and Performance in Thirty-Six Countries. http://digamo.free.fr/lijphart99.pdf

³ Ibid.

inherent in coalition formation.¹ In systems with proportional representation parties should compromise in order to achieve stability, that leads both to enhanced inclusivity and challenges in policy coherence.² This theory elucidates the complexities of multiparty system governance, where the need and desire of consensus sometimes inhibit effective decision-making, as seen in cases like Italy during the reign of Berlusconi.

From another perspective, accountability is one of the central components to understand the relations between the legislative and executive in parliamentary systems. Elected representatives are assigned with a task to oversee government actions, which is operationalized via mechanisms such as parliamentary committees and votes of no confidence.³ This framework postulates that accountability enhances government responsiveness to public needs and also mitigates the risk of the overarch of the executive. In its turn, historical institutionalism provides insights into how the major historical events shaped the development of parliamentary system and their administrative frameworks. In order to have a clear perception of the development of parliamentary system, a glance needed to be thrown to key historical events and major reform movements like it was in medieval England, France, as well as post-World War II reforms that slightly impacted the structure and legitimacy of parliamentary systems.

Early examples and their development

Origins of parliamentary systems can be traced back to medieval England, where the development of parliamentarism contributed to the shift of governance system from feudal rule to more organized governance.⁴ The first document that de jure limited the power of the monarch in state was Magna Carta of 1215,

¹ **Dahl, R.** (1998). On Democracy. Yale University Press. https://newuniversityinexileconsor-tium.org/wp-content/uploads/2022/08/Robert-A.-Dahl-On-Democracy-1998-1.pdf

² Ibid.

 $^{^3}$ **George, T.** (2002). Veto Players: How Political Institutions Work. <u>http://nzaher710.free.fr/coursLSES/poltique.pdf</u>

⁴ **Prtichett, V.** (1918). "Origin and Growth of Parliamentary Government," Kentucky Law Journal: Vol. 6: Iss. 5, Article 4. https://uknowledge.uky.edu/cgi/viewcontent.cgi?article=5217&context=klj

which established a principle that the king was subject to the law. The reforms continued up until 1295, when King Edward I transformed the parliament into a more inclusive institution. By his order not only the nobles, but also the clergy and representatives of towns were allowed to become the members of the parliament. Within time English parliament evolved and transformed from a mere advisory council into a strong legislative body; the apogee of this transition took place after the English Civil War (1642–1651) and the Glorious Revolution of 1688. Such tremendous changes secured the triumph of establishing the supremacy of parliament over the monarchy, which led to the development of constitutional monarchy, where the executive had to share its power.

The shift to constitutional monarchy in this case could be analyzed through several prominent political theories. At first a glance needed to be thrown at John Locke's theory of social contract that posits that government is a mutual agreement between the rulers and the ruled with an emphasize on the protection of liberty, property and life.⁵ Locke's ideas significantly impacted the English political landscape, as they underscored the necessity of parliamentary sovereignty and the right to rebel against tyranny. The application of his theory on practical field was most vividly seen during the Glorious Revolution, where "Immortal Seven" led by William of Orange established a constitutional monarchy. Successful transition of England into constitutional monarchy was marked by several elements one of which was the establishment of the Bill of Rights in 1689. It was a landmark achievement that provided a legal framework for limiting the power of the monarch and safeguarding individual rights. It laid the foundation of parliamentary democracy by ensuring regular elections within parliament and the right to question the decisions of the monarch.⁶

¹ Ibid.

²**Pollard, A.** (1926). The Evolution of the Parliament. https://core.ac.uk/download/pdf/7048897. pdf

³ Ibid.

⁴ Ihid

⁵ **Nation, M**. (2019). Locke's Social Contract: Is It Legitimate? https://uca.edu/cahss/files/2020/07/Nation-CLA-2019.pdf

⁶ Bill of Right. (1689). https://avalon.law.yale.edu/17th_century/england.asp

Ideas of separation of power between the different state institutions significantly impacted England's southern neighbor France at the end of the 18th century. The famous French Revolution of 1789 made a seismic shift in the political landscape of France and in Europe as well. It is not surprising that famous diplomat of that times Metternich once said "When France sneezes the rest of Europe catches a cold". Revolution marked a transition from absolute monarchy at first into constitutional monarchy which did not survive due to fact that the king tried to flee France. The representative system laid the groundwork for modern parliamentary system. Initially, the National Assembly attempted to have a similar model that was established in England. Since 1791 they attempted to limit the power of the king by creating a constitutional monarchy where Louis XVI would have shared the power with the legislator, who would present the interests of the nation.¹

However, this system did not manage to work due to fact that king attempted to escape France, which made the provisional government to abolish the monarchy. After such radical changes the legislator was also subjected to slight changes. The National Convention replaced National Assembly and the institution itself was filled with radical elements like the Jacobins led by Robespierre.² Interestingly that until the establishment of the Directory in 1795, France could be considered as a parliamentary state ruled by a single party. During the Reign of Terror of 1793-1794 National Convention led by Robespierre unilaterally ruled the country. Of course, it could be stated that Robespierre turned the legislator into its personal weapon, as the Convention was ruled by the majoritarian Jacobin party, and those who dared to oppose ruling party (like Girondists) were oppressed and "left out" of politics.

Even in such a conjuncture, parliamentarism in France managed to develop. In 1795, Thermidorian coup threw the Jacobins out of political arena and brought significant legislative changes. A newly established government led by Paul

¹ **French Constitution of 1791.** (1791). National Assembly. https://wp.stu.ca/wp-content/up-loads/sites/4/2015/07/French-Constitution-of-1791.pdf

² Ray, M. (2023). What Led to France's Reign of Terror? Encyclopedia Britannica. https://www.britannica.com/story/what-led-to-frances-reign-of-terror

Barras introduced a new, bicameral legislative system composed of the Council of Five Hundred and the Council of Ancients.1 This period (otherwise called the period of pluralism) allowed multiple parties to regain the right of voice; however, such decision led to stratification of political arena due to constant struggle between radicals and royalists.² Nevertheless, it should be mentioned that Directory laid the groundwork for the establishment of more structured parliamentary system which was abruptly ended by Bonaparte's coup in 1799. Needless to say, that fragmentation of parliament and its incapability to solve economic and political issues in the state contributed to its collapse. Under Bonaparte's reign the legislative branch (The Senate and Legislative Corps) existed but de facto did not have any power over the emperor. Up until 1848, legislative branch in France was moved into the background. With the proclamation of the Second Republic a universal male suffrage and a new constitution were introduced which included the importance of popular sovereignty and representative government.3 Due to the new constitution, the Legislative Assembly gained considerable power; however, internal divisions and external pressures weakened the Republic.

Parliamentary administration through legal perspective

Parliamentary administration reflects the complex relationship between constitutional frameworks, legal norms and the functioning of governmental institutions. The legal grounds of the parliaments are grounded in the constitutions or in case of Israel, the UK, and Australia in fundamental laws, which dictate the organization and functioning of the general state power. The key legal principle, that is aimed to ensure legal principle in parliamentary administration is the doctrine of responsible government.⁴ According to this

¹ **Britannica, T. Editors of Encyclopaedia** (2024). Thermidorian Reaction. Encyclopedia Britannica. https://www.britannica.com/event/Thermidorian-Reaction.

² Ibid.

 $^{^3}$ Constitution de 1848, II République (1848). $\underline{\text{https://www.conseil-constitutionnel.fr/node/3811/pdf}}$

 $^{^{4} \}textbf{Comparative research paper on parliamentary administration (2016). } \underline{file:///C:/Users/PC-6/Downloads/Comparative%20Research%20Paper-EN-LowRes.pdf$

doctrine, the executive (the prime minister and the cabinet) shall be accountable to the legislature (the parliament). In other words, the executive cannot govern without the support of the elected legislature.

Legal mechanisms such as votes of no confidence or parliamentary inquiries serve as channels through which the legislature may hold the executive responsible. Additionally, in parliamentary systems, committees play a crucial role in overseeing the actions of the executive branch. From a legal perspective committees are vested by a statute of parliamentary rules to implement inquiries, subpoena witnesses and review the actions of the government. Such legislative oversight is important in order to ensure that actions of the executive are consistent with the law and public policy objectives.

From another perspective, parliamentary administration also touches upon the administrative law, which controls and governs the functioning of public bureaucracies. In parliamentary systems, the relationship between the elected officials and the civil service is an important component of governance. Public sector governance such as regulations on public procurement, administrative discretion and citizen complaints provide legal tools for holding the executive accountable through administrative processes. This aspect of parliamentary administration ensures that executive actions align with the rule of law and respect of citizens' rights.

Conclusion

Examination of parliamentary administration allows to have critical insights into the intricate dynamics of governance within parliamentary systems. This article attempted to explore the unique interplay between executive and legislative processes, as well as broader political landscape, influencing accountability, representation and stability. Distinction between majoritarian and consensus models underscores the diverse approaches to the governance, with each having

 $^{^{\}rm 1}$ Law and Justice: The Case for Parliamentary Scrutiny: The responsibility of parliaments and their members to prevent torture and ensure human conditions of detention: legislative and oversight measures (2006). <u>http://archive.ipu.org/PDF/publications/law-and-justice-e.pdf</u>

its own advantages and disadvantages and a set of challenges. The impact of historical evolution on parliamentary administration from its origin in medieval England to contemporary adaptation highlights the ongoing tension between legislative and executive branches, with each trying to gain as much power within state as possible. Understanding these complexities is important for analyzing the effectiveness and resilience of parliamentary democracies, especially in an era where political fragmentation and coalition governance are increasingly prevalent.

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Ամփոփագիր

Սույն հոդվածն ուսումնասիրում է խորհրդարանական կառավարման հայեցակարգը քաղաքագիտության մեջ՝ ընդգծելով դրա դերը կառավարման հեշտազման, <u>ք</u>աղա<u>ք</u>ականության իրականազման և խորհրդարանական համակարգերում ընտրված պաշտոնյաների հաշվետվողականության գործում։ Հոդվածում քննարկվում է օրենսդիդ, գործադիր և դատական ճլուղերի միջև փոխգործակցությունը՝ ընդգծելով, թե ինչպես են խորհրդարանական հանձնաժողովները վերահսկում կառավարության գործունեությունը և ապահովում թափանցիկություն: Կոալիցիոն կառավարությունների անհրաժեշտությունը, տրված Իսրայելի Քնեսեթի օրինակներով, ուսումնասիրվում է համակարգերի հիմքում խորհրդարանական ոնկած տեսական կողքին, ինչպիսիք են մեծամասնական շրջանակների սենսուսային մոդելները։ Հոդվածում անդրադարձ է կատարվում նաև խորհրդարանական կառավարման պատմական զարգացմանը միջնադարյան Անգլիայից մինչև ժամանակակից ադապտացիաներ՝ րնդգծելով օրենսդիր և գործադիր իշխանությունների միջև ուժերի շարունակական հավասարակշռությունը։ Արդյունքում կատարված եզրահանգում, որ այս դինամիկան հասկանալը կարևոր խորհրդարանական ժողովրդավարությունների արդյունավետությունն ու ճկունությունը վերլուծելու համար, հատկապես քաղաքականապես մասնատված միջավալրերում։

հիմնաբառեր. խորհրդարանական կառավարում, քաղաքագիտություն, օրենսդիր մարմին, գործադիր իշխանություն, դատական իշխանություն, հաշվետվողականություն, կոալիցիոն կառավարություններ, բյուրոկրատական արդյունավետություն, մեծամասնական մոդել, կոնսենսուս մոդել, պատմական ինստիտուցիոնալիզմ։

ПАРЛАМЕНТСКОЕ УПРАВЛЕНИЕ КАК ОБЪЕКТ СРАВНИТЕЛЬНОЙ ПОЛИТОЛОГИИ

Аннотация

В этой статье рассматривается концепция парламентского управления в политологии, отмечая ее роль в содействии управлению, реализации политики и подотчетности выборных должностных лиц в парламентских системах. В ней обсуждается взаимодействие между законодательной, исполнительной и судебной ветвями власти, подчеркивая, парламентские комитеты контролируют действия исполнительной власти и обеспечивают прозрачность. Необходимость коалиционных правительств, которая продемонстрирована на таких примерах, как израильский Кнессет, рассматривается вместе с лежащими в основе парламентских систем теоретическими рамками, такими как модели большинства и консенсуса. В статье также прослеживается историческая эволюция парламентского управления от средневековой Англии до современных адаптаций, подчеркивая сохраняющийся баланс сил между законодательной и исполнительной ветвями власти. В конечном счете, в ней утверждается, что понимание этой динамики имеет решающее значение для анализа эффективности и устойчивости парламентских демократий, особенно в политически раздробленных средах.

Ключевые слова: парламентское управление, политология, законодательный орган, исполнительная власть, судебная система, подотчетность, коалиционные правительства, бюрократическая эффективность, мажоритарная модель, модель консенсуса, исторический институционализм.

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