

PRIMUS INTER PARES?

AN INSTITUTIONAL COMPARISON

OF THE OFFICE OF PRIME MINISTER

Britain, the Republic of Ireland, Sweden and Denmark

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Thesis for the degree of Ph.D.

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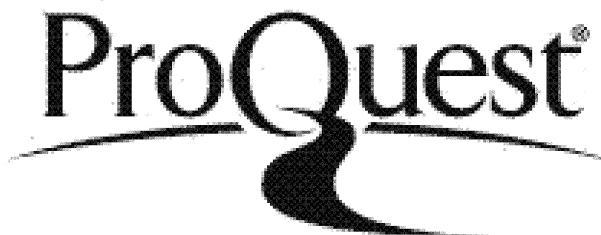


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THESES

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For Marlies Cruse,

Wisdom not lost in knowledge.

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Preface

My Master's thesis, which dealt with the premiership in Sweden, the UK and Japan, was submitted in 1991 and ever since the idea of continuing along the same, largely unexplored comparative path remained in my mind. In 1992-1993 I received funding (Weinsteins stiftelse and Åbo Akademi) which enabled further efforts. However, at the time of writing this preface it is already 1997. During this lengthy process many things have changed. The premiership has become a primary political topic in my native Finland, as the political system has continued to shift from being president-centred towards normal parliamentarism. The Maastricht Treaty has also changed the European political landscape and contributed to highlight the office of prime minister. Currently the Maastricht Treaty is being revised by an intergovernmental conference. *Tempus fugit.*

Many circumstances have also changed personally. The years spent in London brought acquaintances and ideas and the time has indeed had an impact on my way of perceiving society - Britain in particular. I am very grateful and privileged to have received a generous grant from the Academy of Finland, without which all this would have remained only a dream. A dream it will always remain in the sense that I, during the spring of 1993, only applied for postgraduate studies to the LSE and only applied for one scholarship. Already having a bit of distance to the work, even geographically, I think I dare state that I will look upon the time in London as one of the most fortunate in my life.

A word about the work. Trying to manage the unmanageable, this work already is lengthy in comprising around 300 pages. Still the study does not proclaim to be an exhaustive examination of the reasons for variation in 'the prime ministerial component' (as it was put by Müller, Philipp & Gehrlich in 1993). A general problem with studies in central political institutions, like the premiership, is the large number of influencing factors. I have drawn the line of examination at some absolute core institutions (veto-dimensions), well aware of institutionalism most often implying a broader, but also more abstract, perspective. I hope that even those who disagree with the overall framework of the study will be able to benefit from its constituent elements. The overall aim was - and is - to understand how different political systems function.

Finally, I am indebted indeed to my friends, parents and professors at the London School of Economics and Åbo Akademi for support throughout. The responsibility for any mistakes or ambiguities rests solely with me.

Strasbourg, France,
in February 1997,

Fredrik Holm

Abbreviations and terminology

| | |
|-----------------------|--|
| Árd fheis | Annual party congress (Irish) |
| CFSP | EU's Common Foreign and Security Policy (the Maastricht Treaty Pillar II) |
| Dáil | The lower house of the Irish Parliament (<i>Dáil Éireann</i>). It sometimes refers to the parliament in general (whereas the upper house is the <i>Senate</i>). |
| DEN | Denmark |
| EU | The European Union |
| Folketing | The Danish unicameral parliament |
| Formateur | A person forming, or trying to form, a cabinet (prime minister-designate) |
| Informateur | A person collecting information as a basis for government formation |
| IRE | The Republic of Ireland |
| JHO | EU's Common Justice and Home Affairs (the Maastricht Treaty Pillar III) |
| PLP | Parliamentary Labour Party (UK) |
| Pouvoir neutre | Benjamin Constant's expression for the neutral power/discretion enjoyed by, for instance, the head of state. |
| Riksdag | The Swedish unicameral parliament (Sw. <i>Riksdagsman</i> = MP) |
| SAP | Social Democratic Labour Party (Sweden) |
| SWE | Sweden |
| Tanaiste | Deputy Prime Minister (Irish) |
| Taoiseach | Prime minister (Irish, plural <i>Taoisigh</i>) |
| TD | Dáil deputy (Irish, abbreviation of <i>Teachta Dála</i>) |
| UK | The United Kingdom |

Nota bene

- ☞ The footnotes restart from number one in each chapter as a means of avoiding too large footnote numbers.
- ☞ The adjectives 'Scandinavian' and 'Nordic' are used interchangeably to depict Sweden and Denmark, which constitute one analysed pair of countries. 'Premier', which also under some circumstances could refer to the head of state, is here used synonymously with 'prime minister'.
- ☞ This study generally refers to political institutions and actors, like a prime minister or a constitution, without using block capitals.
- ☞ The copyright of this thesis rests with the author and no quotation from it or information derived from it may be published without the prior consent of the author.

1. PRIMUS INTER PARES? - AN INTRODUCTION

"The very fame of the office, and its deep-rootedness in history, seem in a paradoxical way to have led to its neglect by political scientists."

A. King 1991

1.1 The Objective of the Study: A Comparison of the Institutional Framework

The purpose of this study is to compare the institution of prime minister in four political systems, in all of which the prime minister is the principal political actor - the centre of effective executive power. The four nations are Britain, the Irish Republic, Sweden and Denmark. The analysis is institutional in its general character; it is interested in clarifying by means of rigorous comparison the institutional frameworks within which prime ministers in different nations have to act. The prime ministers in different systems have usually been seen as playing different roles, ranging from consensual chairmanship to presidential leadership. This thesis examines the underlying institutional setting, the institutional leadership profiles, to see to what extent core institutional factors may explain perceived variation within and across nations. Blondel put it as follows: "... *it must be concluded that there is prima facie a very strong case for believing that these characteristics of the positions 'make a difference'.*"¹

The ambition is not, as in most studies of the genre, to concentrate the comparison on one aspect of the office, as for example with a comparison of constitutional or administrative law. This study is a cross-system comparison of three core dimensions within an overall theoretical framework that delineates the institutional setting of the office. Summarised in one sentence the fundamental question of the study is:

Which institutional factors, if any, explain variations in the leadership profile of the prime minister in different countries and how do they operate?

¹ Blondel 1988a, p. 16.

A majority of West European nations focus effective political power on *one* person - the prime minister. The media concentrate on the prime minister, governments are identified by their leaders' names, even the government's competence is judged by the performance of the prime minister.² In addition, prime ministers today, contrary to many presidents,³ play a key role not only in national politics but also in international and supranational arrangements, of which the European Union and its decision-making processes is the foremost example. European prime ministers reach an increasing number of tangible decisions in the European Council and the European Union's Reflection Group for the 1996-1997 Intergovernmental Conference concluded that the importance of this body is likely to increase further in the future.⁴

In one of the seminal articles on how the *Single European Act* of 1986 came about, Moravcsik stressed the role of the prime ministers' *national constraints and freedoms*, an approach he labelled as 'institutional intergovernmentalism'.⁵ In another seminal article on how domestic and international politics are entangled, Putnam stressed the explanatory role of domestic institutional arrangements.⁶ Paradoxically, few studies have attempted to systematically define what these constraints and freedoms are, let alone their specific effects. This study wants to shed light on the prime ministers' central institutional constraints and freedoms and wants to show which institutional aspects that are crucial for different offices of prime minister. Institutionally oriented comparative analyses have tended to focus on one singular institutional component, or have been theoretical pleas for a return to the examination of institutions in political science.⁷ This study will try to accomplish a course in between these two alternatives by concentrating on core institutional determinants of the office.

² See Weller 1985, p. 48.

³ The French presidency can be seen as the exception to the rule.

⁴ Reflection Group Report (1995), p. 27, article 97.

⁵ Moravcsik 1991.

⁶ Putnam 1988.

⁷ E.g. Hall 1986 and March & Olsen 1989.

A similar set of core institutional determinants exists in most systems. First, the constitution and related conventions regulate certain aspects of the premierships; second, accountability to the party sets some other limits to the premier's exertion of power and, third, the cabinet usually plays a central role for the prime minister - the prime minister exists by virtue of the cabinet and, often, the cabinet by virtue of the prime minister. These are the core dimensions of this study. Although similar basic sets of determinants usually exist, their implications might be very different. King has strongly suggested that is the case, that premiers would get a 'considerable shock' were they to compare their powers.⁸ However, do institutional powers guarantee 'power'? Do the institutional constraints and freedoms equalise one another in some cases and, when unbalanced, aggregate considerable prime ministerial capabilities or incapabilities in other cases? In the final part of the study these questions are elaborated with the help of theoretical concepts such as the 'institutional leadership profile'.

In recent decades premiers have gained more policy-making power whereas national parliaments have been seen as net losers of influence. Apart from the EU, the vast number of other multi- or bilateral prime ministerial summits under the auspices of, for instance, G7, OSCE, UN, the Council of Europe and the OECD has to be kept in mind. High-level summity seems to be one of the trends of European politics in the 1990s, judging both from the frequency and, more importantly, the substance of different prime-ministerial meetings.⁹ International negotiations take place even at statemens' funerals. Yet one is seldom familiar with the national restraints under which prime ministers have to act - on the international as well as on the national political scene. Systematic information about these restraints and freedoms is what this study aims at. The purpose is to picture the *modus operandi* of the prime ministerships.

⁸ King 1994, p. 151.

⁹ See, e.g., Lee 1995.

These constraints and freedoms are directly linked to political outcomes. Forceful prime ministers are able to face party- or electoral unpopularity with greater equanimity, and the government may therefore be more stable and difficult decisions easier to take when consequences do not impinge directly on the leader's position.¹⁰ The hypothesis is that the structure of the prime ministership is of explanatory value just as much as circumstances and personalities.¹¹

For a concrete example, what are causes and consequences of a prime minister's resignation? Does a resignation imply the government will have to resign *en masse* or not? Is it caused by a defeat in a party-leadership election, and, if so, how small a minority within one single party can force a replacement of a nation's prime minister? A resignation may have far-reaching implications on a multitude of levels; even a sudden mid-term change of personnel in charge of the EU's Council Presidency has been caused by a premier's resignation.¹² This resignation also led to a total and unexpected change of the cabinet's political composition, all without general elections. This study provides general answers to *when* the system-specific institutional setting helps premiers and when it hinders them, and *how*.

Furthermore, this study explains what the likely scenario would have been in other political systems. Does the prime ministership imply different things in different systems or is the role of West European heads of government after all relatively similar? In addition, the creation of a framework of analysis should prove helpful for further academic inquiries, since the office increasingly is focused on. The benefits of examining what the prime ministership actually is extends beyond prime-ministerial systems. Amendment of the relationship between president and prime minister is a paramount topic in, for instance, semi-presidential Finland. *Summa summarum* the renowned words of Stein Rokkan can be paraphrased: "*Votes count but resources decide*".¹³

¹⁰ Weller 1985, p. 48.

¹¹ In a comparative article on premiers in 1991 Richard Rose went further, stating the institutional setting "*creates greater differences than do personalities*", *idem*, p. 9.

¹² Denmark 1993 (or the 1996 EU-presidency and elections dilemma in Italy).

¹³ Rokkan 1966.

1.2 Why a Study of the Office of Prime Minister?

The institutional distribution of executive power is at the core of political science. The distribution of executive power has been essential in a number of works ranging from Duverger's classic *Les Régimes Politiques* to Lijphart's *Democracies* and beyond.¹⁴ Yet patterns of executive power have tended to be a neglected and blurred area of political science,¹⁵ even in many authoritative works on political leadership like Kellerman, Paige and Burns¹⁶, to name but a few. When executive power has been the issue, heads of state, predominantly presidents, have been in the focus of political research.¹⁷ In spite of a surging interest in executive power there is, as of today, little research specifically on the office of prime minister, save the British office. A few exceptions include Elgie's recent studies of the French prime minister and of political leadership¹⁸ as well as the academic offspring of Blondel's and Müller-Rommel's project on comparative cabinet decision-making, *Governing Together*.¹⁹

This scarcity is evident when one looks specifically for comparative studies of the office of prime minister. Apart from the project by Blondel & Müller-Rommel there are only a couple of major works that have directly dealt with the office comparatively, Jones' *West European Prime Ministers* and the slightly older *Presidents and Prime Ministers* by Rose & Suleiman.²⁰

¹⁴ Duverger 1955, see the entire first part, pp. 5-55; Lijphart 1984.

¹⁵ Blondel 1987, p. 29.

¹⁶ Kellerman 1984, Paige 1972, 1977 and Burns 1978.

¹⁷ Blondel 1980, p. 4.

¹⁸ Elgie 1993.

¹⁹ Blondel & Müller-Rommel 1993.

²⁰ Jones 1991c and Rose & Suleiman 1980.

This shortage is not concurrent with the political weight of the office and especially the notion that the office of prime minister is gaining in importance in several nations, as well as on the expanding scene of international and supranational politics. Judging from the frequency with which the topic appears in the press, the neglect appears all the more incongruous. Blondel has constantly advocated analyses of political leadership from a comparative perspective,²¹ especially as there has been a trend in the social sciences to move towards an examination of central political institutions.²² A pertinent plea by Blondel is from 1991: *"The structure and characteristics of national executives pose a number of normative questions which have been so far the object of little study."*²³ In 1994 Anthony King renewed a plea for comparative studies in an outline of 'West European Chief Executives'.²⁴ Further research and a redirection of the debate has also been advocated by 'core executivists', most notably Dunleavy and Rhodes.²⁵

There are several reasons for the described disparity between plea and probe. The symbolic and public suit of power has often been worn by the head of state, whereas the prime minister plays a key functional role in the political system. The prime minister often operates through consensual decision-making in cabinet and exerts his or her powers as a *pouvoir moderateur* - a moderating power and chairman who binds together different currents of political will. This explicit lack of information and systematisation of the knowledge of the office has on many occasions led to uninitiated debates in the media.²⁶ In Britain the debate went as far as to cause a clear division between those who identified 'prime ministerial government' and those

²¹ Ibid., p. 1.

²² Examples of this renaissance are, e.g., March & Olsen 1984 1989; Hall, 1986, Wiberg (ed.) 1991 and Nousiainen 1988 (p. 1). See also Ruin 1987, p. 233.

²³ Blondel 1991, p. 89.

²⁴ King 1994.

²⁵ Dunleavy and Rhodes 1990. The authors also make a thorough survey of the British debate on the office of prime minister. See also Rhodes 1995 in Dunleavy and Rhodes (eds.) 1995.

²⁶ On the British debate and its essential contributions, see Norton 1988, pp. 108 -110.

who pointed to 'cabinet government'.²⁷ The defenders of the first-mentioned school find the powers of the office too extensive, whereas the disciples of the latter line of thought point to the restraints that surround the office of prime minister. This classic debate reached an understandable peak during the Thatcher years and has since been carried on with a different focus.²⁸

Regardless of the school of thought the scholars have found there is too little research on the office of prime minister. Many Westminster-system specialists have made pleas for research on the office of prime minister, among others George W Jones: "... *despite such eminence the office of the prime minister is little studied.*"²⁹ and Patrick Weller: "... *we need to describe the prime minister's job so that we can understand it better. Yet research on prime ministerial power has been as indecisive as the debate.*"³⁰ Accordingly, characteristic traits of debates on the 'powers of the prime minister' include a diverse scale of underlying purposes and, often, a lack of scientific argumentation.³¹ There is a demand for a comparative clarification of what the office of prime minister is and can be, and what it might imply. Another opening is towards management theory; in the field of business management there are numerous studies that delve into the relationship between leadership and its organisational context. Furthermore, the vast majority of prime ministerial studies deal with the British office. Only a handful of accounts have examined this central office in the Nordic countries.³² The

²⁷ Ibid., p. 108.

²⁸ See Rhodes 1995, p. 13-14. This introduction will not go into the details of the British debate varieties. For this purpose Hodder-Williams & Shell 1995 (ed.) and Rhodes 1995 (article) are useful and include numerous further references.

²⁹ Jones 1991a, p. 1. See also Coakley 1984, p. 403 and O'Leary 1991, p. 135 for similar views on the office in the Irish Republic.

³⁰ Weller 1985, p. 2.

³¹ Concerning the British debate, see, e.g., Benn 1985, pp. 221-241, Crossman 1985, pp. 175-194 and Sedgemore 1980. Compare Ruin 1986, 1991.

³² Swedish works on the topic are those of Ruin, see idem 1986, 1990, 1991. In Denmark the office has been touched upon by Vahr, e.g. idem 1991. The Danish works by Dehn-Nielsen (1990) and Fischer (1989) cannot here be categorized as political science analyses. Olsen has written an essay about the Norwegian prime minister, idem 1980, and in Finland the office has been touched upon by Murto 1994 and Nousiainen 1992. None of the works

enlarged European Union³³ and its institutional forms of focusing political power in the hands of the prime ministers, especially through the European Council, have highlighted this lack of information. The Anglo-Saxon literature in the field is extensive, but in being so it is also as varied in its depth as it is in its width and in its purposes. There have been only a few successful examples (mentioned above) of simultaneously tackling these dimensions. Furthermore, the primary literature has very often tended to be of a biographical character. It is extraordinary that there are studies of 'birth order and prime ministership' at the same time as basic institutional determinants have remained uncompered.³⁴

1.3 The Structure of the Study

This introduction, and the background on the office of prime minister, are followed by six longer chapters. The second chapter lays out the methodology, the framework of analysis and *how* and *why* the four countries were chosen for an analysis of the premiership. The second chapter is comparatively long. It evolved from an essay on the methodology of studying the premiership institutionally and is here reproduced in its entirety. Together with this introductory chapter these two chapters constitute the background part of the thesis. Chapters three to six are empirical and comparative analyses of the office. They deal in order with the prime ministers' constitutional standing, the party leadership aspects, the cabinet-internal aspects of leadership and cabinet-external relationships. The final seventh chapter sums up the comparisons and integrates theory and practice: what is the prime ministership in different systems? Which are the constituent parts of the institutional profile and what is their significance?

mentioned is truly comparative in the tradition of, for instance, Przeworski & Teune (1970).

³³ Austria, Finland and Sweden joined 1.1.1995.

³⁴ Birth order and British prime ministership has been examined, however critically, by Somit, Arwine and Peterson 1994.

1.4 The Office of Prime Minister: A Short Background

The aim of this chapter section is to broaden the general perspective and background on the office of prime minister. It should be read as an introductory part to the study of the institution, and as a complement to the methodological framework laid out in the next chapter.

1.4.1 The Prime Minister in the Political System

Almost without exception a parliamentary government with a cabinet led by a prime minister is the rule in Western Europe. In other parts of the world the presidential system is more frequent.³⁵ However, in all political systems the head of government plays an important role, if not the most important of them all. The parliamentary accountability of the prime minister varies as much as the 'power position' varies, and these two components are not clearly interconnected. Much of the power that prime ministers exert today is hard to define *de jure*: it is the result of a tacit development that has been taking place during the whole century, with an emphasis on the period after 1945 (with which this study will be concerned). As the flow of governmental business has undergone an almost uncontrolled expansion, it is to a less extent possible to reach decisions *in plenum* and, as a result, the role of the formally collegial premier has been claimed to bear more and more resemblance to a president. On very few occasions has this trend been tangible in modern constitutions, and with very different rates of success. The most prominent example of explicitly letting the prime minister outline national politics is found in the present German constitution, in the *Kanzlerprinzip*. The modern constitutional engineering of the office is not, however, the only pivotal point. The office has been the focus of debates precisely because of the paradoxes surrounding it. Japan is an example of a nation that provides the prime minister with a prominent constitutional position which the incumbents, as of today, have been relatively unable to utilise. Various attempts to reduce the power of the executive by constitutional provisions have to a large extent experienced the same fate. In conclusion, powers seem to be no guarantee for power.

³⁵ See, e.g., the table in Shugart & Carey 1992, p. 155.

The increased international workload has also fundamentally altered the position of the prime minister. National political systems have a still increasing need to be represented by key politicians in the expanding and important sphere of supranational politics, and in this context the influential role of the prime minister has become all the more evident. Prime ministers are to an increasing extent involved in foreign-policy decision-making. Today's supranational character of politics has had several 'side effects'. One tangible example is the relationship to the media, especially television. Instead of meritocracy the political scene uses the media as a catalyst - and vice versa. A skilful prime minister can manage many political 'dead ends' with the help of the media, but the media also have the power, instantly, to reverse the position for a less media-skilled leader. This media-focusing has also turned election campaigns into personalised vote appeals. In an age of 'public prestige', the problem with the media is that they are only partially controlled by the actors in the game, and certainly not by the politicians. The complex relationship between media and politics is one of the reasons for not focusing on the media dimension in this study. The prime minister's media relationship needs a study of its own.

Political science has provided a wide variety of attempts to explain the 'power' and 'power structures' of the political executive. As the result of research that has attempted to understand the whole executive decision-making system, several concepts like 'core executive' and 'cabinet system' have been coined. These analyses have emphasised different aspects: compositional elements (coalition and game theory), structural elements (a multitude ranging from institutional to 'inner cabinet' and policy community explanations) or socio-psychological elements, often even at the same time. In the 1980s attempts to combine several elements emerged.³⁶ In most cases several simultaneous factors contributed to an elevation of the position of the prime minister, as in the UK in the 1980s. At the other end of the scale one finds systems, where prime ministers scarcely have had the opportunity to be something other than a *pouvoir moderateur*.

³⁶ Dunleavy and Rhodes 1990.

1.4.2 A Primus Inter Pares?

The relationship between the executive and the legislative power/political systems can be divided into two categories:

in
in

- a)** cabinet systems
- b)** presidential systems

The interdependent relationship between the executive and the legislative powers is characteristic of cabinet systems. The extent of dependence varies (compare Montesquieu's thoughts on British government in *De l'esprit des Lois*), but the basis of the political legitimacy of the executive and legislative branch is derived from the fact that they stem from the same mandate of the national electorate. In outright presidential systems the executive and legislative powers receive separate mandates from the electorate and the duties of the head of state and the executive power are united in the same person. In cabinet systems the executive and legislative powers should be two sides of the same coin. In a pure cabinet system the cabinet is formed on the basis of relationships in a sovereign elected parliament and the performance of the cabinet is determined by its political responsibility towards the parliament. The prime minister and the cabinet are not selected for a certain period of time; they remain in office as long as the confidence of parliament is retained. The close dialogue between the legislative and executive powers is regulated through a number of instruments typical of prime-ministerial systems. Formally or informally the cabinet should be able to dissolve parliament and call an election. The collective character of the cabinet is another feature. The collective cabinet, as described by Walter Bagehot, was a cabinet in which not only the prime minister was equal to his colleagues, but also the rest of the cabinet ministers were seen as being equal (the concepts of collectivity and collegiality are dealt with in chapter five of this study). In many nations it is common not to have votes, at least formally, in cabinet, of which Britain and the Irish Republic represent examples. In presidential systems the cabinet is a group of advisors; in cabinet systems the prime minister should be a team leader, the first among equals. In many cases the prime minister is seen as more than a *primus inter pares*, often because the prime minister is the leader of his/her party and thus

not directly sanctioned by the doctrine of parliamentarism.³⁷ In cabinet systems people do not vote for the executive leader of the nation; the cabinet is always selected through and by the legislature. For this reason a majority of ministers are usually also members of parliament, Sweden is one of the few nations that does not allow simultaneous membership of cabinet and parliament.

In some constitutions the distribution of executive power is a cause of confusion (see also the notion of 'executive' below). At first glance many nations seem to be compromises in the borderland between the two categories a and b mentioned above. It is therefore important to dichotomise the notion of executive power based on the distribution of effective power, which creates the categories *effective* and *symbolic* executive power. A majority of the republics with presidents as head of state, for instance the Republic of Ireland, should therefore be categorised as cabinet systems if the distribution of effective executive power is the *definiendum*. It is more common that republics are cabinet systems than vice versa. Thus it is important not to equate monarchies with cabinet systems and republics with a presidential system. Yet this is often the case, old nation-constructs are usually monarchies and cabinet systems. After a closer look at executive power it is evident that only a few intermediary forms exist. Switzerland represents a collegial political system, which cannot be counted in either category a or b above. On the other hand, Switzerland might be the best example of a system where the prime minister *de facto* is the first among equals. France and Finland represent different shades of another, semi-presidential, concept with a rather rare combination of two active branches of executive power.

Another way of differentiating between political systems is to examine parliamentary practice. Looking at systems from a theoretical point of view of executive power, the executive may react to socio-political changes in two ways. It may either *change its own policy* or *change the political basis* of the executive, and through that facilitate a different policy. Depending on which tradition a system leans towards, one can speak of different forms of parliamentarism, or coalition elasticity. Coalition elasticity simply means how wide a tendency there is to form coalitions in a system. In a nation with low elasticity a one-party government

³⁷ Duchacek 1973, pp. 176-177.

is the natural alternative. Thus this elasticity is connected to the methods of election. The other related elasticity is that of policy elasticity: how big ideological changes there are in the implementation of policies in nations. A low coalition elasticity tends to bring with it a high policy elasticity, which is typical for systems with classic parliamentarism. The counterpart is low policy elasticity and a high tendency to create coalitions, which Nousiainen calls 'small party parliamentarism'.³⁸ The systems analyzed in this study represent different models of parliamentarism within these frames.

However, all four systems dealt with here are cabinet systems as for the distribution of effective executive power.³⁹ The effective executive power tends to be concentrated in the hands of the prime minister. Therefore one can speak of *prime ministerial systems*. In some nations this shift of power has been deliberate, with help of the constitution (compare postwar Japan); in other nations this process has been of a more implicit nature. Today's prime ministerial systems have gradually developed from the mould the British Westminster-tradition has offered during the past 300 years. Through the global tentacles of the British empire this model has been of utmost importance for the dispersion of classic parliamentarism. Applications of the British model can today be discerned from Africa through to Asia and Australia.⁴⁰ Blondel sees the birth of prime-ministerial systems in the appointment of an administrative assistant, a minister, by monarchs.⁴¹ This *Office of Chief Minister* grew immensely in prominence over the years, yet the development is difficult to describe in detail. Duchacek has stated that: "*The characteristics... of the system... are due less to constitutional, legal and political theory than they are to political necessity and the accidents of history.*"⁴²

³⁸ Nousiainen 1985.

³⁹ See also a discussion on the notion of cabinet government in chapter 5.

⁴⁰ See Blondel 1973, pp. 77-91.

⁴¹ Idem 1980, p. 264. See also Benemy 1965, pp. 1-21, Helander 1984, pp. 34-35 and Burns 1978, p. 372.

⁴² Duchacek 1973, p. 175.

Overall, it is important to acknowledge the legacy of history. The British office is still recognisably the same office it was a hundred years ago, and Irish expectations that their *Taoiseach* would dominate politics were fuelled by their experience of the old, pre-1918, United Kingdom.⁴³ The further development from cabinet government to prime ministerial government, so frequently accounted for in the 1980s, is supposed to have been caused by several factors. Crossman saw the main lines of development as being, first, the growth of a centralised bureaucracy - so vast that it could no longer be managed by a cabinet behaving like a board of directors - and, second, the centralisation of the party machine under the personal rule of the party leader.⁴⁴ Weller mentions further aspects, for example personalised election campaigns and an increased level of prime-ministerial patronage.⁴⁵ The title of Foley's book sums it up, *The Rise of the British Presidency*.⁴⁶ In the 1990s the tide of the debate seems to be turning, or at least diverting, thus the last sentence of Crossman's introduction to *The English Constitution* seems appropriate: "*Perhaps the secret of Prime-Ministerial government... will be as rapidly overtaken by events as Bagehot's The English Constitution was when it appeared in 1867.*".⁴⁷ Or is change after all mostly an illusion? Scholars like Jones and Hodder-Williams have emphasised the permanence of the (British) office at the expense of its superficial changes: while prime ministers now get more attention, a more searching spotlight, their effective powers remain much the same.⁴⁸ This study tries to contribute to this debate by delivering a detailed account of the workings of the institutional aspects.

⁴³ King 1994, p. 160.

⁴⁴ Crossman in the introduction to Walter Bagehot's 'The English Constitution', new edition 1993, p. 52.

⁴⁵ Weller 1987, p. 499.

⁴⁶ Foley 1993.

⁴⁷ Crossman (1993 ed.), p. 57.

⁴⁸ Jones 1990a and Hodder-Williams 1995, p. 231.

1.4.3 On Terminology: 'Prime Minister' and 'Executive'

In spite of playing fairly similar political roles, the terminology surrounding the office of the cabinet chairman is somewhat confusing and inconsistent. For that reason it is worth making a brief comparative discourse in the terminology of the office. In the Anglo-Saxon world the term *prime minister* is the generic uniting factor. The title is used in, for instance, Britain, Canada, South Africa, India, Ireland and New Zealand. Thus it is natural to have this term as the point of departure in this study. In the Nordic countries the term *statsminister* is used ('minister of state'). A direct translation from Finnish would supply the term *head minister* ('pääministeri' ~ head of government). In both the Nordic nations of this study, the title is *statsminister*, even though other terms, like *premierminister* and *konseljpresident*, were frequent in older constitutions and administrative practice. The latter title, which in French is *Président du Conseil*, is still in use in France and Belgium. Within the Germanic sphere of influence the term *Bundeskanzler* or *Kanzler* is used for the co-ordinator of the executive power (Germany and Austria). To avoid confusion it is noteworthy that in Germany *Ministerpräsident* is used for the executive leader of a federal state, one of the *Länder*, whereas the similar title, *Ministerpresident*, is the equivalent to prime minister in several southern European nations. In Spain the term used is *Presidente del Gobierno* and in Italy *Presidente del Consiglio*.

The same multitude of variations surrounds the concept of executive. Blondel has written that one of the few certainties of any political system is that it has an executive.⁴⁹ One can certainly approach the concept of executive from many angles, but a key question is its composition, i.e. whom is the concept to include? In its widest respect it refers to a whole branch of the political system (compare the United States), a branch that was seen as "*being in charge of the 'execution' of the policies of the state alongside the legislative branch...*"⁵⁰. The expansion of the public sector has, however, brought about narrower and more common definitions that allow one to distinguish between the different branches in charge of policy execution. According to this range of definitions, the executive consists only of the cabinet.

⁴⁹ Blondel 1987, p. 219 (the UK local government is one exception to that rule).

⁵⁰ Ibid.

This view is particularly strong in the Nordic countries and constitutes one of the points of departure for this study. However, this leads to the further problem of defining the cabinet. A cabinet consists of ministers, but in several countries, especially in explicit cabinet systems, one also finds ministers of state, parliamentary secretaries, second ministers and under-secretaries. This variety of junior offices leads to another main dimension apart from composition, namely the hierarchical structure. The common principal view of parliamentary systems is that of the executive functioning as a committee with equal members; one is simply chairman, thus *primus inter pares*. The opposite to the idea of the executive as a committee is a presidential system. In that case there is a strict hierarchy of power, at the top of which one finds the president (irrespective of whether the regime is democratic or authoritarian). A prime minister is never a president with personalised power: he/she must function with and through the cabinet and party/parties whose consent they need to survive, which all leads to wide diversity.⁵¹

In the words of Anthony King: "*If the prime ministers of different European countries were to devote one of their summit sessions to comparing notes in their different offices, they would probably get a considerable shock. A power that one prime minister takes for granted is beyond another's wildest dreams.*"⁵² In the following chapters this study will try to reveal to what extent this statement is true, and the implications.

⁵¹ See Weller 1987, pp. 498-499.

⁵² King 1994, p. 151.

2. THE OFFICE OF PRIME MINISTER COMPARED: METHODOLOGICAL ASPECTS

"... all types of political leadership need to be classified and categorized and to be related to the situations in which they emerge as well as to the consequences that result from them. ...students of leadership have too often given a low priority in the past to the elaboration of the typologies and classifications that are necessary if the instruments of the power of political leaders across the world are to be realistically assessed and related to different types of societies."

J. Blondel, *Political Leadership*, 1987 (preface)

2.1 Towards a Theoretical Framework for Analysis

This chapter on method is an attempt to find the most suitable of approaches for a study of the prime ministership. The chapter will proceed in a deductive way, starting off with the intention of the study and proceeding towards a specific design by assessing the suitability and value of different theoretical approaches. The chapter is divided into two main parts, the *systems-external* and *systems-internal* setting. The systems-external part deals with the comparative method, the choice of political systems and how to cope with cross-national comparison. The systems-internal setting is concerned with defining the specific design and relevant determinants within chosen political systems.

2.1.1 The Core Problem and the Undertaking

Throughout the 1980s and early 1990s there has been a wide interest in the office of prime minister in several Western European nations, particularly in the form of a debate about the extent to which political resources, more abstractly 'powers', should be vested in the office. Only some years ago a common denominator of the debates was the concern with decreasing the resources of the executive. At the time of writing the tide of argument flows in the opposite direction. Both scholars and laymen have been apt to see the role of personalities as the key to the volatility of the office, e.g. in Britain. However, this study focuses on these problems from a different angle.

There is an institutional set of factors behind every political actor's action (or non-action). The point of departure is that the institutional framework of a political institution, like the office of prime minister, is of primary importance as it - and only it - defines the boundaries of the institution's actions.

The word *only* is appropriate as this study is concerned with liberal democratic systems.¹ For example, a British prime minister may perform admirably or terribly in Question Time, but it is all within the institutional confines of Question Time. Political science has generally neglected two institutional aspects of *elite actors* like prime ministers. First, *a theoretically stringent clarification of the institutional framework* - what the premiership is - and second, as a logical continuation, *a systematic institutional comparison of the office* - how it compares. The few studies that have had an ambition in this direction, for example Weller's *First Among Equals*, have proved to be substantial contributions to the general debate about the office and its resources, perhaps as the anomalies of every system tend to become apparent only in comparison with other systems.

This study will try to continue along the comparative path and create a model for defining and assessing the institutional framework of the premiership. The model should be as much a tool for *inter-system* comparison as a means of clarifying the system-internal framework. The development of such a model of the office of prime minister, or even an attempt thereto, would be a contribution to the debate on the office. This arduous task will initially be divided into three phases. After the creation of a theoretical model, the second step is to select political systems for the comparison and apply the model. Eventually there should be a model and its empirical application - a comparative analysis of institutional frameworks. A final third step comprises a continued elaboration in one of two plausible directions: either to look back and penetrate the reasons for the present situation, or to move forward and elaborate the consequences of the present framework as set out by the model (to deliver predictions).

From knowing *what* the study is interested in explaining, the long path towards answering the question *how* can start.

¹ It is not at this stage the intention to get involved in a discourse on the notion of *democracy*. Hence the referral to liberal democratic systems is general in this context.

2.1.2 An Institutional Point of Departure

When a person-focused political institution, like that of the prime minister, has been studied, it has mainly been carried out as either

- a) a person-focused analysis, or
- b) an institutional analysis.

This dichotomy reflects much of the classic strain between institutional and behavioural currents in political science. Concerning the office of prime minister, these two approaches have been contrasted by, for instance, Norton, who advocates an analysis of prime ministers that puts persons and personalities in the foreground.² Norton stresses that it is useless to discuss the office *in vacuo*, which still is too general a point of departure. Whether one deals with political institutions or with personalities the context should not be disregarded.

A case study-approach would focus on how *different* prime ministers have affected *the* institution, however the intention here is different. The intention is to separate the prime ministership from the prime minister by defining and then comparing the institutional frameworks of the office, without lapsing into Norton's institutional vacuum. In a seminal article on comparing prime ministers in 1991, Richard Rose argued that the institutional setting "*creates greater differences than do personalities*".³ This study's point of departure bears resemblance to Rose's, although this examination is more cautious in weighing these elements against each other. The institutional setting is relevant and worth examining; it supposedly creates differences as personalities only act, to a greater or lesser extent, *within* a certain institutional setting. In a comparative perspective the institutionally designed maximum scope of prime ministerial action, and possibly also minimum limits, can be expected to vary from system to system. If the institutional setting in a system proves to be consistent in providing a lot or only a little space for action, it will be of interest to see how that has corresponded with political reality (the former case should be the archetype of 'a strong leadership' and the latter of 'a weak leadership'). The internal coherence of the prime ministership's institutional profile will be essential in several ways. First, it will be of interest to see how coherent the different institutional sub-parts of the framework

² Norton 1988, pp. 108-115.

³ Rose 1991, p. 9.

have proved to be, and, second, it will be of interest to compare the aggregated institutional 'profiles' across countries. Is the amount of institutional freedom of action on an even level throughout or do different sub-parts of the leadership point in different directions?

Yet, how does one know that a clarification of the framework is relevant and not just theoretical modelling made unapplicable by a variety of other factors, like personalities and the structure of the cabinet? Neustadt accurately stated that powers are no guarantee of power.⁴ March and Olsen turn the point of departure into a full-fledged answer:

"Political institutions simplify the potential confusions of action by providing action alternatives; they simplify the potential confusions of meaning by creating a structure for interpreting history and anticipating the future; and they simplify the complications of heterogeneity by shaping the preferences of participants... As a result, it is hard to be sanguine about contemporary theories of politics, or contemporary efforts to reform politics, that ignore institutions, or relegate them to a secondary role."⁵

First of all this study is preoccupied with the task of defining the institutional patterns and comparing them, it is not exclusively interested in policy outcomes and their explanations. An outcome preoccupation make studies focus on the width of explanation rather than the depth, as a thorough explanation in social science usually comprises a multitude of explanatory variables. This study could thus potentially be criticised for delivering only a partial explanation, which, however, is a deliberate choice. Second, this institutional outlining is not an entirely descriptive process. This thesis confronts the constitutional aspects with the actual experiences (mainly chapter three versus chapter five and six) in order to establish institutional patterns beyond mere description.

The impact of personalities on the institution (or vice versa) is a part of the office which one cannot deal with under the premises of this study. The question is more about the drawing of institutional boundaries, i.e. how much of the evidently extensive scope of influencing sources should be included in the analysis? 'Core executivists' would claim that the whole is of greater importance than the

⁴ Neustadt 1992, p. 10.

⁵ March & Olsen 1989, pp. 171-172.

specific,⁶ as would advocates of policy community studies, with an added emphasis on the networks between the executive actors. However, a great part of the debate has been blurred by the dogmatic and contentious (and chiefly British) debate on prime ministerial versus cabinet government (see the introductory chapter). This classic academic clash has recently been under attack from new angles. Dunleavy and Rhodes see it as misleading to assert the primacy of the cabinet in the amalgam of organisations and mechanisms of government.⁷ Alternatively, the British debate has not just described a certain pattern of coordination but as much a normative ideal of how the centre of government should operate. Norton does not want to enter the debate on any side, but rather draw attention to what he calls the limitations of the prime ministerial debate itself.⁸ He is afraid of the neglect of the significance of individuals as well as of losing the historical perspective. The essential content of the debate on the office in Western Europe has been in the axis of whether prime ministerial 'power' should be increased or decreased, and, hence, what the sources of prime ministerial influence are. The mere speaking of increasing or decreasing this 'power' implies that one is concerned with institutional aspects. However, there have been many attempts, especially in the 1970's, to explain political behaviour without political institutions, which fuelled a reaction in the form of neo-institutionalist argumentation in the 1980s. Neo-institutionalists would advocate an examination of the institutional setting in its own right, as they see institutions as rational and to some extent autonomous structures.⁹

However, this study wants to draw on several traditions. It acknowledges the cabinet system-argument that a large number of different factors have to be accounted for, but nevertheless wants to pursue a different path. What it aims at is to examine the core of institutional arrangements that surround the office of prime minister and, thus, discern its *modus operandi* (i.e. to explain the role of the PM in the policy-making process rather than the whole policy-making process). The core, as defined here, consists of *veto-dimensions*, i.e. dimensions that may undo the prime ministership, for example the party leadership (a defeat in party leadership elections). If the study deals with clearly defined veto-dimensions, an analysis of institutions is more resistant to the criticism of 'cabinet system'-advocates. To speak in allegorical terms: behaviouralists would be interested in the driver of the prime ministerial

⁶ See, e.g., Dunleavy & Rhodes 1990. For their definition of the core executive see *ibid.*, p. 4.

⁷ Dunleavy and Rhodes 1990.

⁸ *Ibid.*, p. 108.

⁹ See, e.g., Grofman 1987, March & Olsen 1989. Cf. Nousiainen 1988, p. 29.

car, institutionalists in the car itself, some 'cabinet system' advocates equally in the road and the other cars; this study focuses mainly on the vital parts of this 'prime ministerial car'.

Policy outcome-oriented scholars would argue that the point of departure should be less inductionist, that it should be the examination of a specific problem or hypothesis that evolves into a study of certain aspects of the office. There are several reasons for slightly departing from this dogma. First, the primary goal is to define and examine the institutional leadership profiles (see later chapter sections). Second, in the introductory chapter a peculiar lack of general studies of the office has been accounted for. Third, the ideological abode of the study is in a classic institutionalist tradition (as opposed to the neo-institutionalist tradition).¹⁰ The institutionalist approach has been criticised for creating structural rather than causal models. This problem has to be recognised; it most often emerges as difficulties to empirically test institutional models. This study encounters the problem as it attempts to create a comparative institutional model. The most straightforward solution is simply to minimise the problem of testing by being as methodologically coherent as possible. Methodological coherence is also the best way to minimise relativist criticism, i.e. the difficulty of adequately performing cross-system and cross-cultural comparisons. Aware of these problems the study can proceed and make an attempt to clarify the general framework *within* which prime ministers have to act, without denying the importance of (person-focusing) studies which concentrate on *how* they have acted.

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The purpose is not to enter into a too extensive discourse on ideological points of departure. The prime ministership is by no means an independent *actor*, neither is it (here) merely a pluralist *arena*. It simply has to be stressed that there exists an ill-defined political territory within which the prime minister has to act and that the narrowness or wideness of this institutional domain plays a central part in shaping the incumbent's roles and outcomes. The institutional framework set out to discover equals the boundaries of this political domain. At a later stage an attempt to measure the 'diameter' of this domain will be made and the study will try to distinguish differently shaped and sized domains as different institutional leadership profiles.

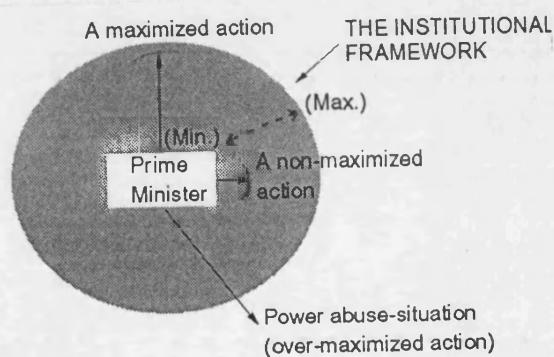
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These 'boundaries' are important because they are made up of veto-dimensions. A veto-dimension may undo the significance of the other dimensions. The party leadership is again a practical example of a veto-dimension in this study (chapter four). If a prime minister, at the same time most likely to be a

¹⁰ The difference between the two traditions is arduous to define. However, neo-institutionalism emerged as a reaction against behavioural traditions and therefore emphasises the normative aspects of institutional determinants.

party leader, loses a party leadership election it also undoes the whole prime ministerial leadership. Two further points should be made. First, the institutional framework defines an outer borderline, a *maximum* setting, or the borders of an area of action within which other factors are allowed to determine the extent to which that domain is used by the prime minister. The larger the domain, the more utilities and political space are available for the prime minister. The minimum of leadership would in the figure below be the centre-point.

Illustration 1. THE INSTITUTIONAL FRAMEWORK



Second, the institutional framework is no constant.¹¹ Even though the institutional framework changes more slowly and to a much lesser extent than factors like personality and particular political circumstances, one has to acknowledge variations in the framework. The party leadership referred to above may again be an example of a factor that alters the setting, in this case from party to party depending on the party's rules (this topic is analysed in chapter four). Before being able to assess any inter-system variation one has to master the intra-system variation of the office. The one and same domain of the office is different from different points of view. The prime minister of the constitution may entirely differ from the prime minister of party politics. A major challenge to this study is to create a model which attempts to assess not only particular dimensions of the office, but also, as a result, provides an assessment of the institution as an entirety.

2.1.3 Does the Institutional Framework Matter?

Another crucial stage in the research process is the linking of the institutional theoretisation to the actual processes of the studied institution. Does the institutional framework to be defined here generally matter? This linkage should not be taken for granted (which neo-institutionalists tend to do). Thus, before commencing the comparative analysis, one needs to examine the *empirical* relevance of portraying the *modus operandi* of a premiership. A recent project on cabinet government, which in 1993 emerged as the publication *Governing Together*,¹² has been an important incentive in this respect. This project attacked the problem of assessment of institutions by compiling data through an extensive questionnaire to ministers. In this comparative study the contributors Müller, Philipp and Gerlich made the following conclusion on the office of prime minister:

"As far as the bulk of prime ministers is concerned, the evidence does suggest that, overall, there are both a number of structural differences and a continuum resulting from country specificities and, almost certainly, personality characteristics."¹³

¹¹ Cf. Jones 1987 and 1990, pp. 1-3. Jones sees the cabinet as the key explanatory variable for the power of the British PM and refers to it as an elastic which can contract or expand to suit different incumbents.

¹² Blondel & Müller-Rommel (eds.) 1993.

¹³ Müller, Philipp & Gerlich 1993, p. 253.

Their essay is one of the first systematic attempts to examine intra-system differences between prime ministers, in several countries.¹⁴ Only after assessing different leaderships within the same system is it plausible to put forward evidence about the impact of systemic institutional characteristics. Their conclusions comprised all the nations this thesis is interested in. Eventually Müller *et al* account for differences between, rather than within, offices of prime minister, but scarcely for the reasons for these existing differences, which left a niche for research. The task is to define the limits of prime ministerial leadership, within which variations occur, and account for structural differences and country specificities. Thus this study arrives at its two fundamental questions: *Which institutional factors contribute to explaining the variation in the leadership profile of the prime minister in different countries - and how do they contribute?*

2.1.4 Defining a Comparative Point of Departure

The introductory dichotomy in this chapter between institutionalism and behaviouralism should be dressed in a more specific scientific suit. When one wants to *compare* the office of prime minister there are four logical points of departure. One can choose

- 1) to compare the institution with other parts of a specific political system, or
- 2) to compare the institution with its equivalents in other political systems, or
- 3) to compare the influence of one or several prime ministers on the office, or
- 4) to compare prime ministerial personalities across systems.

These four approaches are somewhat overlapping. In this study the aim is a cross-system analysis of the institution. Regarding the emphasis of this project, the order of preference is exactly as presented above (with little attention paid to the fourth approach). To be able to work on a cross-system level, one has to possess knowledge of the inner relations of the concerned systems. A deeper look at the complex of comparative methodology and comparative approaches are means of helping to realise both dimensions of the study. However, before a further discussion on methodological optimisation is of any relevance the dependent and independent variables have to be defined.

¹⁴ A part of their study is to assess "top" leaders against "other prime ministers" concerning *role, style and fields of involvement*. See table 10.13 in *ibidem*.

2.2 The Systems-Internal Setting

2.2.1 The Office of Prime Minister: The Dependent Variable

Almost none of the works on the office of prime minister focus on it as the dependent variable or, at least, use that terminology. Speaking of a dependent variable implies the recognition of a set of factors that can be given different values, i.e. variables, as well as a presumed causal relationship between these variables, and, furthermore, that such a relationship can be distinguished. To be able to attribute certain values to a variable suggests the existence of a categorisation, a model which allows one to do so. Most attempts to study elusive *elite actors* in politics tend to stumble before the criteria above are met simultaneously. It is common to describe a certain determinant (e.g. an interest group¹⁵) and its possible impact on the office without making any hypotheses or typologies related to the dependent variable. Without defined and categorised differences of the dependent variable, a variation of the independent variables is of little use, as is the case vice versa. This inconvenience is frequently caused by a lack of systematisation and especially because a definition of the dependent variable lies dangerously close to the independent variables in the study of political institutions. *How can the variance of the office be defined?* In studies with an approach close to this study, it has often been done by relating directly to the explanatory, independent variables. Parts of an institution has been seen as explaining that institution. To exemplify, if one is to assess the influence of labour unions on the office of prime minister, the very variance of the office is *defined* in terms of unions' political variance. Thus, the concepts of independent and dependent variables get intertwined, which makes one blind to the impact of the bulk of explanatory factors. This trap, typical of studies in political institutions, must be avoided by clearly stating not only *what the study is interested in explaining*, but also *with the help of which determinants and how their variances are defined*. The dependent variable must be typologised, so that different values in the explanatory, independent variables can be matched with different categories of the dependent variable. At the same time, the better the variables are defined, the less one gets involved in the usage of extremely value-loaded terms, such as '*power*'. The use of terms like skill and personality easily create vague and dangerously subjective connotations and categorisations.¹⁶

¹⁵ Exemplified by the discussion on the Japanese office of prime minister, see Campbell 1989, van Wolferen 1989 and Park 1986.

¹⁶ Cp. the concepts used by Norton, idem 1988, pp. 108-115.

Only very few classifications of the office have been made in this way. Rose has made what he himself calls a primary typology of prime ministerial roles.¹⁷ This typology is founded on two key variables: whether the constitution centralises power or disperses it broadly throughout government, and, whether there is a single-party government or a multi-party coalition. These dimensions are both vital for this study. However, more useful for the thesis's purposes is a related typology presented by Anckar,¹⁸ which was meant as a means of describing the position of presidents. The model has since been used by, for instance, Nousiainen in his work on Finnish presidents.¹⁹

This model focuses on two broad but crucial and logically connected variables close to those of Rose: the scope of *competence* and the scope of *dependence*.²⁰ The scope of competence is concerned with the political resources and how broad a competence is vested in the office of prime minister (*inclusive* or only *selective* competence). The second variable, the scope of dependence, relates to the extent of dependence on other political actors when using this given competence (*independent of* or *dependent on* other actors). Here the dependent variable is initially categorised by these two dimensions. The only question is how many sub-categories one should use to distinguish differences of degree on these dimensions (only a dichotomisation or more categories?). The advantage of the model is its flexibility, it can be used in either a broad or a narrow sense. The model can be applied to different aspects of an institutional analysis. For instance, the prime minister's constitutional role can be described with the help of this typology, as one also might describe the prime minister's role as party leader. These two dimensions determine the *institutional leadership profile*. Like longitude and latitude these dimensions define the position within a certain framework. These dimensions could be of interest also for behavioural studies on the topic, but in this work they are a tool for determining into which leadership category (or categories) the institutional frameworks of the office put prime ministers.

¹⁷ Rose 1991, p. 18.

¹⁸ Anckar 1984, pp. 91-93.

¹⁹ Nousiainen 1985.

²⁰ The original Swedish terms are *beslutsrätt/beslutsposition* (translation from Swedish by the author of this study).

Figure 1. THE POSITION OF THE PRIME MINISTER
A typologisation of the leadership profile

| | | SCOPE OF COMPETENCE | |
|---------------------------|-------------------------------|-------------------------|-----------------------|
| | | Inclusive + | Selective - |
| SCOPE OF DEPENDENCE | Independent of other actors + | Extensive leadership | Intensive leadership |
| | Dependent on other actors - | Sub-ordinate leadership | Figurehead leadership |

Adapted and transformed from Anckar 1984, p. 92.

Thus one initially ends up with four schematic categories that describe variations in the office. The typology of leadership profiles provides categories for the dependent variable, the variations of which can be expected to be described, if not fully explained, by the independent variables. Extensive leadership implies both the competence and the autonomy to pursue effective policy-making. The counterpart is a figurehead leader who neither has the competence nor the possibilities required for effective leadership. More complicated are the categories of intensive and subordinate leaders. An example of a subordinate leader is the post-1945 Japanese prime minister, in whom large powers were vested by the constitution but who, at the same time, was restricted by his dependence on the party and its factions (especially LDP-leaders 1955-1992). At least from a constitutional point of view some semi-presidential systems try to create a prime ministerial leadership that can be described as intensive: the prime minister is free to act independently, but only within a limited scope of competence. France and Finland provide theoretical, and to some extent practical examples of such 'intensive' prime ministerial leadership.²¹ Unfortunately the borderline between presidential and prime ministerial spheres of interest often tend to be blurred in semipresidential systems and they are therefore not a part of this study.

²¹ See Duverger 1980.

2.2.2 Affecting the Office: The Independent Variables

The next task is to define the independent variables that should be isolated and analysed over the office of prime minister. The office of prime minister is undeniably subject to impact from a wide variety of instances: from the constitution, the party, the parliament, the administration and so on. This diversity of influence is one of the reasons for the scarcity of ambitious research models for analysis of this political institution. To provide analytic information on the office within the scope of one single study, one has to be able to make a preference between these sources of influence. Political leadership has been encountered from general and psychological/sociological perspectives in well-known works by, for instance, Paige, Kellerman and Lasswell.²² Other general approaches, with reference to the United States, include Burns' transforming versus transactional leadership (see Burns 1978, especially part IV). Nousiainen has also developed models for assessing influences on leadership.²³ One systematic institutional work is Weller's comparison of Westminster systems, which will be returned to in later chapters.²⁴ Blondel's global perspectives tend to raise as many or even more questions than they answer, which perhaps is his ambition. Nevertheless, Blondel's *Political Leadership: Towards a General Analysis*²⁵ is a pertinent survey of currents and works on political leadership which poses the fundamental question: what is political leadership? Blondel emphasises three different angles of analysis: the impact of the leaders on systems, the role of personalities for political leadership and an assessment of the importance of political institutions for the political leader. Olsen makes a related distinction in his analysis of the Norwegian office of prime minister, "*Leadership may refer to formal roles, to types of activities, or to the results of those activities.*"²⁶ Olsen preferred to emphasise an institutional approach in his study, to analyse the formal roles of the prime minister. The use of the term *roles* seems adequate when dealing with

²² Paige 1972 and 1977, Tucker 1984 and Lasswell 1984 (both in Kellerman 1984). Burns' classical dichotomy of leadership is interesting, but it has too little to offer an institutional framework (transactional and transforming leadership, see Burns 1978, especially part IV). *Repetition*

²³ Nousiainen has presented a model that emphasises two components, one institutional and one behavioral component, Nousiainen 1985a, p. 23 (compare the person-focusing approach versus the institutional approach in Norton 1988, pp. 108-115). This model is of interest but does not offer us a specific enough scope of analysis to start off with. A synthesis between institutional and behavioral components is desirable if one is to enlighten particular cases. However, if the ambition is the opposite, the behavioral component is not of that great an interest. It has also been stated earlier that an institutional analysis should precede a personal analysis.

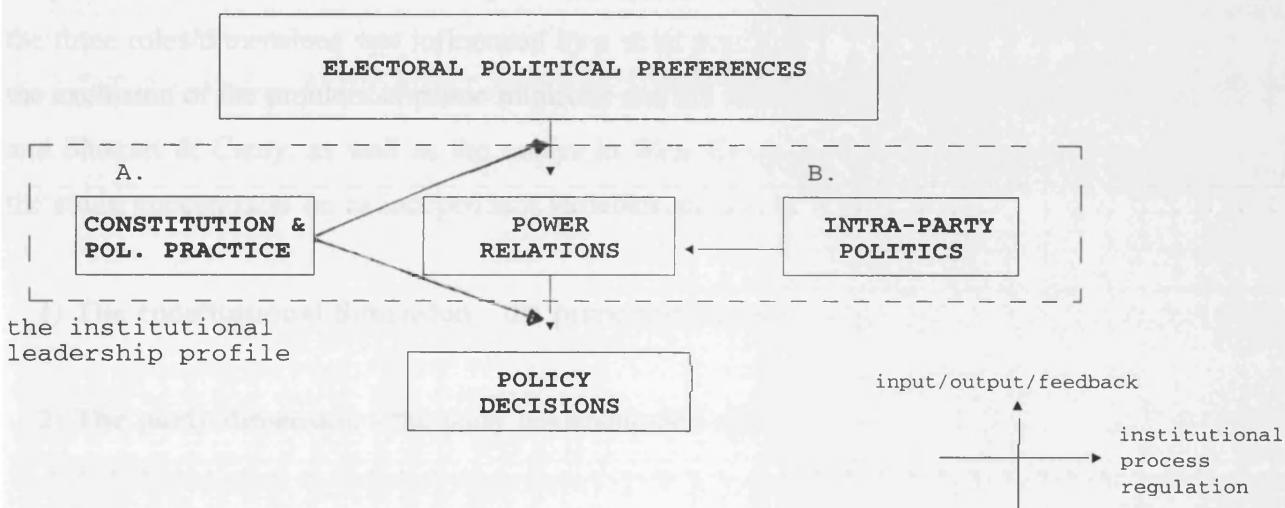
²⁴ Weller 1985.

²⁵ Blondel 1987.

²⁶ Olsen 1980, p. 204.

the office of prime minister.²⁷ The dissection into roles is natural from the point of view that one sooner or later faces the question: when does a prime minister actually act as a party leader, when as a cabinet chairman, when as a spokesman of a particular interest or even own views? This dissection into role-perspectives is further legitimised by the fact that it has been used successfully before. Both Weller and Ruin have used related approaches to the subject.²⁸ So, which are the important roles a prime minister has to manage? The general figure below is a tool for defining the roles:

Figure 2. THE PROCESS OF POLICYMAKING: A GENERAL VIEW



This model is general and can be perceived on a systems-level or concerning only an institution like the prime minister. Political preferences are transformed to various power²⁹ relations with the help of the institutional framework.³⁰ This study argues that the influence of the institutional setting is particularly important at two stages: it forms preferences for power relationships (constitutional aspects) and sets the rules for how preferences together with a certain setting of power relationships transform into policy outcomes. The institutional setting can either have a codified basis, *lex*, or lean on convention, *jus*. The study tries to capture both aspects of box A above when selecting

²⁷ Rose also uses the notion of *prime ministerial roles* in idem 1991.

²⁸ Weller 1985 and Ruin 1986.

²⁹ We permit ourselves the use of the notion of *power* in this general context.

³⁰ See also the first part in Anckar 1984.

perspectives from which to analyse the office of prime minister. When Shugart and Carey assessed the position of presidents, they made a related distinction between legislative and non-legislative powers.³¹ However, assessing presidencies is more convenient than assessing the office of prime minister as one can neglect the (intra-) party dimension (B). In most political systems party leadership is a *conditio sine qua non* of prime ministership.³²

Summa summarum, this study will look at *three* roles, or dimensions, of the prime ministership as independent variables. Each dimension is, as has been mentioned earlier, a veto-dimension. All three dimensions are vital to the office and can explicitly undo the leadership, hence the use of the game-theory notion of veto-dimensions. Each dimension constitutes a separate complex to which a full chapter is devoted. Each of these chapters one should be able to read independently. The choice of the three roles/dimensions was influenced by a strict conception of political systems (see below on the exclusion of the problem of prime ministers and the media), the writing of Ruin, Anckar, Weller and Shugart & Carey, as well as the essays in *West European Politics* 2/1991.³³ The dimensions the study concentrates on as independent variables are the following:

- 1) The constitutional dimension** - the prime ministership in the light of the constitution.
- 2) The party dimension** - the party leadership and other intra-party aspects.
- 3) The cabinet system dimension** - cabinet formation, decision-making processes and cabinet resignation. To be divided into cabinet-internal and cabinet-external dimensions.

On each of these three dimensions, the relative *autonomy of action* enjoyed by the prime minister will be assessed. In other words, the study adheres to an institutional definition of the prime ministership; it only considers the constitutional distribution of political resources followed by inter- and intra-party aspects of the prime ministership. The study will evaluate the importance of each

³¹ Shugart & Carey 1992, pp. 148-151.

³² Details in, e.g., Budge & Keman 1990. European exceptions to the rule have occurred mainly in the Netherlands and Finland. In many cases it has been brought about by the need for an independent caretaker in multiparty systems (polarised pluralism). In the case of Finland the strong presidency has contributed to political 'irregularities'.

³³ A special issue: 'West European prime ministers', later published as a book with the same name, edited by Jones (1991).

veto-dimension by emphasising two aspects in each chapter: the first describing and analyzing the institutional pattern and the second dealing with its importance for the office of prime minister. Furthermore, were this thesis not to draw the borderline at these veto-dimensions, which explicitly can undo the prime ministership, the alternative would be some kind of overall consideration. These dimensions, or prime ministerial roles, also have a logical order (see figure 2). It is appropriate to begin an analysis with the constitutional role, the *prescriptive* dimension of government. The second role, that of party aspects, can be seen as a part of the opposite, of the *empirical* dimension. Together with some additional information (general information on the offices of prime minister) these two dimensions create the prerequisites for the third perspective, the executive-legislative practice of each selected system. Through an analysis of the prescriptive and empirical, the intention is to be able to draw conclusions on a *constructive* dimension. To put it differently, the study looks at what the office of prime minister *should be*, then *what it is* to finally be able to conclude *what it can be* under different circumstances - and *why*.³⁴

Still certain questions have to be answered: e.g. why are some dimensions that intuitively seem to affect the prime ministership excluded? The media constitute one such dimension.³⁵ However, neither the premier nor the media can affect each other in a way which would be sufficiently singular to enable an incorporation of media in the institutional framework. The role of the media is, on the contrary, closely related to the premier's personality. The thesis does not examine the prime ministers' personalities but does describe that certain personal characteristics, like proactive utilisation of media, are likely to be found in this office because the institutional framework acts as numerous sifts, for instance through the selection of a party leader. Thus, political systems are dealt with in a classical narrow sense similar to, for instance, Lijphart.³⁶ Were the thesis not to do that, it would still be facing the problem of drawing an ultimate border somewhere else (foreign involvement, economic factors etc.). The scope of research can always be enlarged at a later stage rather than starting off with a too ambitious framework.

³⁴ More on these three dimensions in, e.g., Lundqvist 1980, pp. 21-22.

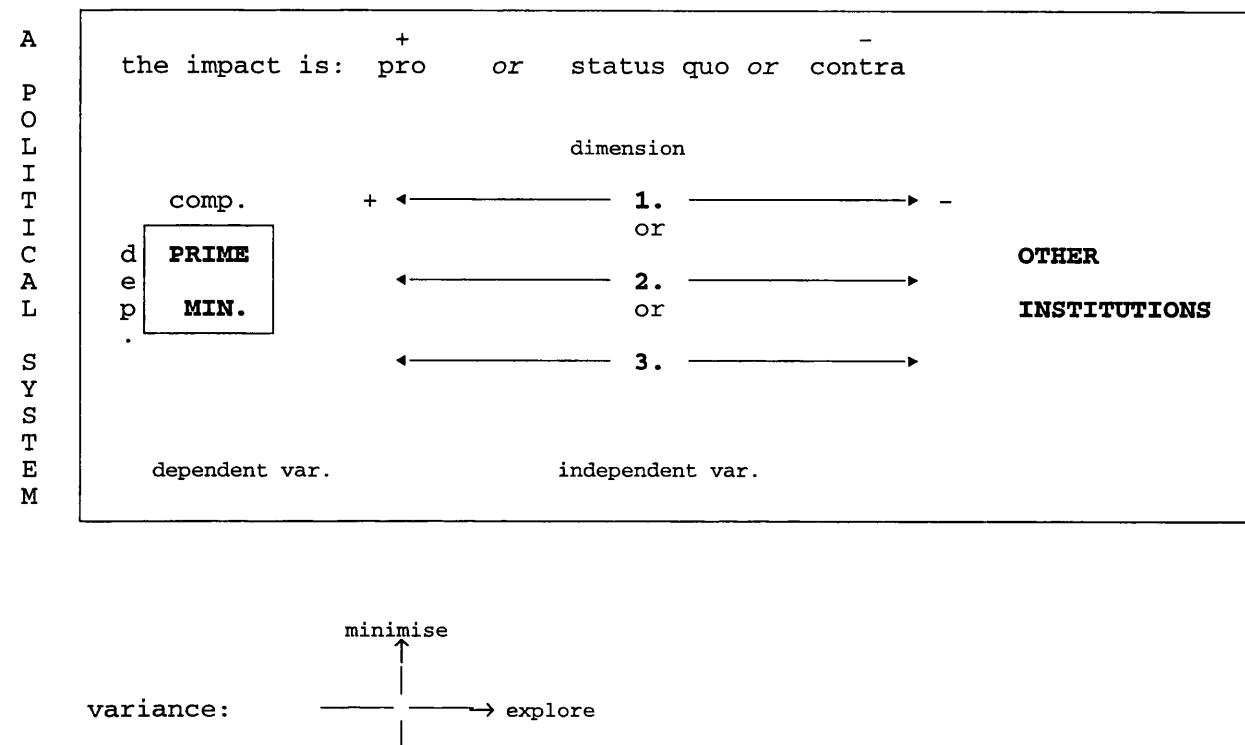
³⁵ See, e.g., chapter 4 in Foley 1993.

³⁶ Lijphart 1984, see especially pp. 1-9.

2.2.3 Towards an Institutional Typology of Prime Ministerial Leadership

When dealing with political institutions they are, implicitly or explicitly, compared with other political institutions or parts thereof. One ends up making a comparison regardless of whether one deals with the inner workings of an institution or with its relationship to other entities. This work deals both with intra-institutional and inter-institutional comparisons within the dimensions defined above. In order to visualise the impact of an independent variable (or a set of variables within the three dimensions) on another variable (like the office of prime minister), the 'impact direction' has to be introduced. This exercise is simply to assess whether an independent variable (generally) has a positive or negative effect on the dependent variable, i.e. whether a variable *'draws' towards or against* the institution. In the scheme below, an attempt to visualise this impact is made. If a certain political competence is institutionalised mainly in another political actor than the office of prime minister, it would imply the drawing of an arrow to the right in the scheme (i.e. away from the office of PM). If it, on the other hand, is a property vested in the prime minister, or otherwise is of advantage for the office, an arrow to the left should be drawn - towards the office of prime minister. The whole task of this study is, in its simplicity, to be conceived through this model. According to this scheme, the horizontal direction of the three dimensions (variables) that affect the office (compare the horizontal dimension in figure two) is what should be measured. The vertical dimension, the interaction between the three dimensions, should be minimised, which hopefully can be achieve through methodological design (chapter section 2.3 onwards).

Figure 3. A VISUALISATION OF THE FRAMEWORK



The model seems simple, but it has certain advantages. If one accepts its implicit assumptions it is possible to assess whether an independent variable seems to affect the dependent variable, and if so, whether the impact is

- a) positive
- b) negative, or
- c) contributes to *status quo*

Hence one can discern *patterns of leadership*, which precisely is the aim. By using this basic concept of direction one arrives at eight different patterns of institutional settings for the office, which will be called *patterns of institutional leadership profiles*. One is apt to see only three contrasting pairs of settings, as the study is dealing with three main dimensions of politics. If one, however, arranges these patterns in contrasting pairs (without the point of *status quo* on any dimension), one finds four different dimensions that emphasise different aspects of leadership. They are as follows:

Figure 4. PATTERNS OF INSTITUTIONAL LEADERSHIP PROFILES:

Four Contrasting Pairs

1. The extremes: transforming vs. transactional leadership

1A. A Presidential Leader

1B. A Figurehead Leader

+———— 1.
+———— 2.
+———— 3.

1. —————>—
2. —————>—
3. —————>—

2. Emphasis on practical vs. constitutional leadership

2A. A 'Manager'

2B. A 'Lame Duck'

1. —————>—
+———— 2.
+———— 3.

+———— 1.
2. —————>—
3. —————>—

3. Emphasis on parliamentary dominion vs. subordination

3A. A 'Compromiser'

3B. A 'Caretaker'

+———— 1.
+———— 2.
3. —————>—

1. —————>—
2. —————>—
+———— 3.

4. Emphasis on party-internal leadership vs. submission

4A. A Party Directing Leader

4B. A Party Serving Leader

1. —————>—
+———— 2.
3. —————>—

+———— 1.
2. —————>—
+———— 3.

The concepts chosen for describing the first contrasting pair, those of transforming versus transactional leadership, are the same concepts coined by Burns that were referred to in 2.2.³⁷ These two concepts represent the extreme institutional settings of the office of prime minister and, accordingly, the two columns of the figure describe stronger and weaker prime ministers with an emphasis on different institutional dimensions. Above in figure 4, a prime minister has the institutional prerequisites for transforming ("presidential") leadership when all three dimensions generally work in favour of him/her, as in 1A. The opposite, a leadership that is purely transactional (1B), is the case when none of the three institutional dimensions enable a powerful position and the role of the prime minister, hence, is reduced to that of a figurehead leader. In this case, he/she cannot transform the policy process at all and is all the more a political administrator. Such a position implies that the main political resources are vested in other parts of the system, in a president or, more seldom, in the legislature. Were this not the case, the systems concerned would not be liberal democratic systems (for example when power is vested in the military command). Thus, one of the typology's assumptions is that the three dimensions can be seen as, more or less, a set of games that allocate a certain amount of resources to the prime ministership. The logic is that of a spatial game, in which the office of prime minister, concerning the three dimensions, is put against other institutions to which the resources potentially could be allocated.

The second dimension emphasises the constitutional point of departure. If a prime minister is distanced from some core political activities by the constitution, but other dimensions tend to enhance the status of the office, one can speak of *a manager*. There are two possible causes for such a leadership profile: either a constitutional vagueness concerning the position of the office, or the opposite, in other words that prime ministerial influence is deliberately circumscribed *pro forma* but overrun by political reality. The manager-leader has a mandate that to a great extent relies on practice, plausible, for instance, when the constitutional arrangements become out of touch with political reality. This prime minister is a practical leader, not a leader relying on constitutional prerogatives. The opposite scenario is, with a slight risk of confusion, called *a "lame duck" leadership*. The constitution vests responsibilities in the office, but the incumbent is unable to use his/her powers because of the negative impact of the two other dimensions, the party and parliamentary politics. The torn expression "lame duck" was chosen particularly because it describes a controversy between the prescribed and the described. It could be argued it is enough to have lost the confidence of one's party to be a "lame duck" and, indeed, this possibility will be

³⁷ Burns 1978

discussed below. However, at least, a prime minister that generally is backed only by the constitution is apt to be 'a paper tiger'. Dutch prime ministers and many LDP-prime ministers in Japan have been described as such lame ducks by a considerable literature.³⁸

The third sub-dimension focuses on the role of parliamentary practice in the system. This dimension comprises more than just parliamentary politics. It attempts to assess executive-legislative relations and also incorporates intra-cabinet questions into this dimension. The third dimension seems to be closely related to the constitutional dimension. Yet, it is by no means clear that the provisions of the constitution and the parliamentary practice are similar to each other, or even 'move the setting in the same direction' from the point of view of the premier. A prime minister who is favoured by the constitution and on whom no strict forms of party accountability is focused, but who is restricted by parliamentary practice, is here referred to as *a compromiser*. This is a leader with a favourable point of departure, but who is restricted in the exercise of power over the legislative body and therefore has to compromise with it to maximise his/her policy utility. An example of such a leadership would be a prime minister without practical abilities to dissolve parliament (for other than intra-party reasons). Such a leader is not as "weak" concerning policy decisions as a lame duck, but has to strike compromises in order to stay in office.

The fourth dimension is concerned with the prime minister's prerequisites from the point of view of party-internal politics. As stated earlier, one of the study's basic assumptions is the importance of the linkage between party leadership and the office of prime minister. A prime minister may have all other institutional prerequisites for a transforming leadership but not possess a powerful position within the own party. A lack of party support can be caused by, for instance, factionalisation - or formal requirements, like restricted number of terms in the party leadership office. In such a case the leader is dubbed *a party-serving leader*, a leader that typically has to obey the whims of important party factions. The rules and processes around the party leadership elections is therefore the focus of chapter four in this study. The counterpart to a party serving leader is *a party directing leader*, a leader that first and foremost is a key figure of ~~in the~~ own party, but in whom few other institutional powers of the system are vested. It is conceivable that such a pattern especially could coexist with charismatic leadership, although this study will adhere to institutional operationalisations (for genuine examples of this category, compare non-European

X

³⁸ Van Wolferen 1989 is a recent and well-known example in this genre (Japan). As for the Dutch case, see, e.g., Andeweg 1991.

cases, e.g. Mrs Bhutto in Pakistan). A way of making a distinction between this fourth contrasting pair is to refer to the extent of party accountability. A party serving leader has to be concerned about party accountability to a much higher extent than a party directing leader. There is a major difference as a party serving leader has to heed the party in between party leader elections, thus making the leadership more transactional than transforming.

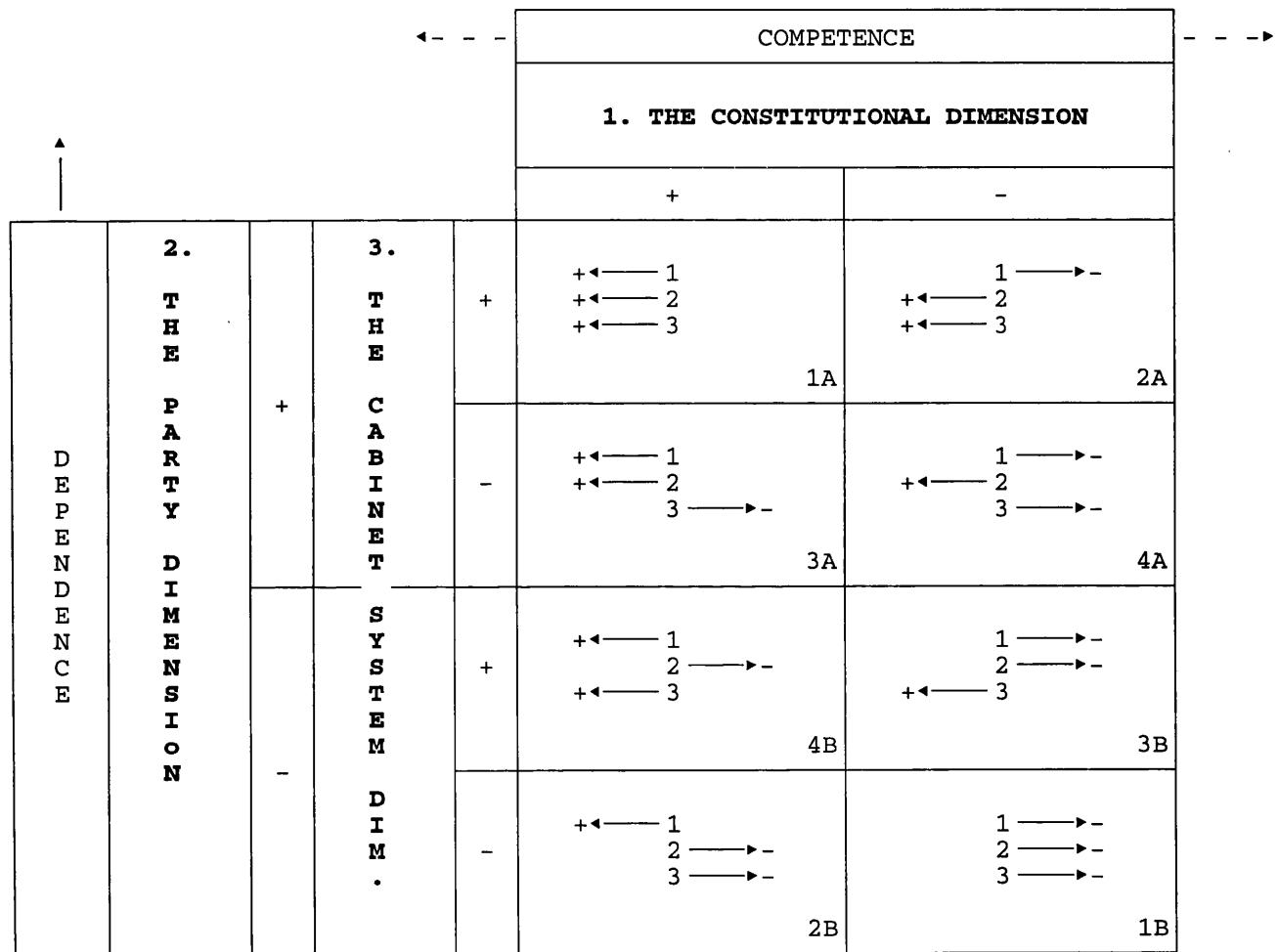
2.3. The Systems-External Setting

2.3.1 A Synthesis: A Model for the Institutional Leadership Profile

A typology such as the one presented above in 2.3 is only descriptive if it cannot be directly connected to the institution it aims at describing. The main feature of the eight-fold typology is that it can be applied to the basic categorisations of the dependent variable, i.e. the two crucial dimensions of competence and dependence.

The scope of competence vested in the office of prime minister is to a great extent similar to the constitutional dimension. The constitution (conceived in a broad sense, including conventions) prescribes the duties and responsibilities of the prime minister. Likewise, both other main dimensions (sets) of independent variables, the party and cabinet dimensions, regulate the prime minister's scope of dependence when using his/her competence. Thus, one arrives at a two-dimensional model with three dimensions of determinants, i.e. the three independent variables. By seeing the constitutional arrangements as the prime minister's scope of competence, the intra-party aspects and parliamentary practice as related to the dependence on other political actors, one discerns eight patterns of institutional leadership profiles (figure four). Accordingly, if a *continuum* on at least an ordinal scale can be constructed for each of the three dimensions, it should be possible to categorise patterns of leadership.

Figure 5. THE INSTITUTIONAL LEADERSHIP PROFILE:
A TWO-DIMENSIONAL MODEL



The figures in the model refer to figure two.

alternatively:



2.3.2 Properties and Problems of the Model

By combining the two aspects of the chapter so far one arrives at a model which with eight categories describes different *institutional leadership profiles*. This model should now be applied empirically to political systems.

Some questions still have to be addressed. Here it is assumed it is possible to assess whether any of the three dimensions work in favour or against the prime minister, or just promote *status quo*. There is a difference between *status quo* through simultaneous contradictory pressures (+ and -) and *status quo* by not affecting the office at all: if a set of variables enhances *status quo*, they do so because different sub-elements point in different directions, the overall result of which is a position of *status quo*. This situation differs from not affecting the office at all, as the contrasting impact of sub-elements can be of interest and even co-vary with other sub-elements. To sum up: even results (or partial results) of the analysis that point at certain elements as enhancing the *status quo* are of interest *per se*. A situation where it cannot be distinguished if a dimension as a whole is more *pro* or *contra* for the prime minister has to be accounted for. If one aspect at the end seems neutral, it is just an indicator of the fact that other dimensions should be focused on in that particular system. If two or all three dimensions seem to be neutral with the boundaries drawn in the study, one ends up with the same interesting question: is the situation caused by an even struggle between two (or even more) centres of executive politics, or does the core of 'power' lie somewhere else?

Another question, perhaps the most important, concerns *intensity*, or measurement scales. How does one measure the intensity with which one dimension is *pro* and another one *contra* the premiership? Could not the step from presidential leadership (1A) to subordinated leadership (3B) be a very small one only? The only thorough answer to the former complex is that such modelling exercises simplify and clarify the dimensions of the analysis and hence are helpful for a comparative study. The key lies in trying to make the theoretical framework as adequate as possible through maximal methodological stringency; the reliability *within* each analysed system must be maximised when measuring similar aspects, if necessary through different methodological means in different systems.

Nevertheless, the categories two (2A, 2B) and three (3A, 3B) are especially interesting when dealing with intensity. Could not the constitutional powers of, say, 2B (the 'lame duck'), be so considerable that they more than compensate for the weaknesses on the two other dimensions, in other words transforming the lame duck into a leader who is more powerful than the counterpart (2A-'the manager')? The risk of any such fallacy can be minimised by examining the statutes and how they have been used in detail. Second, there is little practical evidence to support such a constellation. Even though practical circumstances provide only secondary arguments, we can argue that if, in the above case of the lame duck, accountability to parliament and party mean less than the letters of the constitution, there is reason to doubt that we are dealing with a normal state of affairs in a democratic system.

Another important two-fold problem must be solved. If the dimensions of the independent and dependent variables are put on top of each other, as in figure 5, does not that indicate more of a structural than a causal relationship? A change in the independent variables should create a change in the dependent variable. The second, related question is: Do not the scope of competence and dependence (the dimensions of the dependent variable) comprise more than just the three dimensions the study is concerned with? One could perhaps conceive other political dimensions that influence the basic two-dimensional framework. Figure 5 has two arrows pointing out of the dimensions of competence and dependence as an attempt to draw attention to this point. The task is to maximise the causal relationship between the variables, and to eliminate the two arrows from the model. This goal should be achievable with the help of the selection of as suitable a research design as possible. Therefore the study turns to comparative methodology to find an answer to these questions in the next chapter sections.

2.3.3 Comparison and Its Methodology

2.3.3.1 An Introduction: Towards a Definition

A great number of works on the comparative method were produced between 1965 and 1975. Some readers from that period were to become basic literature for comparativists, among others Przeworskis & Teune's *The Logic of Comparative Social Inquiry*, Macridis & Brown's *Comparative Politics* and Holt & Turner's *The Methodology of Comparative Research*. Towards the end of the 1980s the flood of comparative literature increased again, eminent examples of which are Dogan & Pelassy's *How to Compare Nations* and Öyen's *Comparative Methodology*. Yet, the essence of comparative methodology was conceptualised in the 1960s and 1970s. The gist of the literature has also been diverse, the substance and meaning of comparative research has varied substantially under the comparative label. Often comparison has implied referral to other systems rather than systematic comparison, in the tradition of Lijphart or Przeworski & Teune. How is one then to define the comparative method on a methodological continuum?

The opinions reflected in this work are influenced by Przeworski & Teune and the thoughts Lijphart advocated in *Comparative Political Studies* of July 1975.³⁹ This issue tried to summarise essential methodological questions. Lijphart has also on other occasions elucidated the *definiendum* and *definiens* in a consistent way. One can clarify the comparative method by relating different methods of research to each other. Lijphart has compared the comparative method with the experimental and the statistical.

All these approaches aim at scientific explanations that consist of two basic elements:

- a)** the establishment of empirical relationships between two or more variables, when
- b)** all other variables are controlled, i.e. stay constant.

The experimental method is based on a comparison of two or more identical groups of reference, to which different stimuli are given, under controlled conditions. Thus it is possible to establish a relationship between cause and effect.

³⁹ The July number (vol 8/nr 2/1975) was a special issue on comparative methodology.

The statistical method is reasonably closer to the heart of social science. In this case causal relationships between variables are established by means of mathematically deciphering a large number of observations. A difference between the experimental method and social science is that, in experiments, intervening factors between independent and dependent variables are controlled *ex ante* through the design.⁴⁰ Social science to a great extent relies on *ex post* control of its observational data through statistical means. The statistical method brings with it a number of advantages, as well as some disadvantages. The results are expressed as explicit correlations, which minimises problems of reliability. On the other hand, the step from actual observation to scientific decipherment is often long, which can complicate the control and assessment of validity and subjectivity. The comparative method (if one is to speak of it as a separate entity) is based on exactly the same scientific foundation as the experimental and the statistical method.⁴¹ Thus Lijphart provides the following definition of the comparative method:

*"The method of testing hypothesized empirical relationships among variables on the basis of the same logic that guides the statistical method, but in which the cases are selected in such a way as to maximize the variance of the independent variables and to minimize the variance of the control variables."*⁴²

⁴⁰ Scheuch 1991, p. 31.

⁴¹ Lijphart 1975, p. 161: "The crucial difference is that the number of cases it deals with is too small to permit systematic control by means of partial correlations..." Sartori expresses similar views in American Political Science Review 64 (1970), pp. 1033-1053. See also Przeworski & Teune 1970, p. 86.

⁴² Lijphart 1984, p. 164.

Yet, to be comprehensive, Lijphart's definition has to be put in a broader context. Dogan & Pelassy⁴³ and Przeworski & Teune do not see the minimisation of the variance of the control variables as necessary under all circumstances. They advocate two basic approaches to scientific comparison: to compare similar entities in search of dissimilarities, or, to compare dissimilar entities in search of similarities (a most similar/most dissimilar-comparison).⁴⁴ The most similar-comparison has been the predominant of the two approaches.⁴⁵

The definition proposed by Lijphart is closely related to the first, most similar analysis. A most similar-analysis can be made on two alternative dimensions. One can compare the same entity diachronically, i.e. under different periods, provided that the premisses are rather similar. The other possibility is to compare different entities that have enough similar premisses. However, the elaboration has to be related to this particular study. The aim with this discussion is, based on the basic questions of this research, to maximise the causal relationships and minimise the importance of other factors. After a preliminary definition of the method the study deals with different approaches, *pro et contra*.

2.3.3.2 Maximising the Relevance of Variables through Design

A Most-Similar or Most-Dissimilar Design?

It is now appropriate to define the level on which comparison is to be carried out.⁴⁶ Instead of using the notion of nations below, the study will be referring to political systems. The political systems are of interest, not the nations. The ideal would be not to refer to nations at all, as the mere mentioning of nations tends to bring with it *prima facie* conceptions of the workings of the political systems. The scope of cases could well be broadened to include prime ministerships on other than nation-state levels, *inter alia*, Canadian provincial prime ministers.

⁴³ Dogan & Pelassy 1990 (second and somewhat changed edition of the work first introduced in English 1984).

⁴⁴ A *most-similar/most-dissimilar* design alternatively *similar/contracting* comparison, cf. Przeworski & Teune 1970, p. 32. The most-similar design has also been referred to as studies of concomitant variation.

⁴⁵ See Anckar 1992. Cf. Przeworski & Teune 1970, p. 32.

⁴⁶ See *ibid.*, pp. 26-30, 36-37, 49-57 and Etzioni-Halevy 1990, p. 119.

The adoption of a systems-level analysis is predestined by the two-dimensional definition of the institutional leadership profile (in model one). However, comparative research is often involved in measurement on several levels. A prerequisite of cross-system comparison is knowledge of the patterns of relationships within each system of the cross-system comparison. In an optimal design the system-level determinants have the same reliability within each particular system. However, this is not always the case. Validity in comparative research equals measuring *within* the systems what the study set out to measure. Therefore it is adequate to, if needed, use different operationalisations in different nations. Eventually, which approaches are available for a comparison mainly on a system-level?

What does a most- similar and a most-dissimilar-design on a system level imply for this study? The study is primarily looking for causal relations between the independent variables and the office of prime minister and, particularly, its leadership profile, variations of which it wants to identify and possibly explain. Before this theorisation can be developed further, the control variables should be defined (see the definition by Lijphart on the previous page). Control variables have to be held constant and should, thus, implicitly explain the course being analysed. With control variables on a system-level the study understands the national political systems and their institutional structure, excluding the dimensions of independent variables. Specific indicators for an estimation of the comparability of political systems have, among others, been provided by Blondel and Bebler & Seroka.⁴⁷ If one proceeds with a most-similar design, it implies that the structure of the political systems investigated should resemble each other. Variations in the prime ministership can be explained by variance in the independent variables (for example by different constitutional properties) only when other variables remain as constant as possible.⁴⁸ The establishment of such causal relationships should be the result(s) of the study. Thus, the approach of research would be in accordance with Lijphart's definition of the method.

A most-dissimilar design would on the other hand imply that one, looking for fruitful similarities, choose to compare nations with different political structures. As most other factors are dissimilar, one looks for similar independent variables, like similar constitutional premisses, that explain similarities between the (otherwise different) countries. If one, regarding an institution, finds obvious similarities in different kinds of systems, one is apt to draw the conclusion there is a

⁴⁷ Blondel 1973 and Bebler & Seroka 1990.

⁴⁸ Przeworski & Teune 1970, pp. 37-38.

strong relationship between independent and dependent variables. However, that potential 'intensity' seems to be the only possible advantage of this particular design.⁴⁹ The inability to control other factors is a considerable problem. On a system-level the undesired influence of other factors is difficult to minimise when dealing with a dissimilar set of systems. As a matter of fact both approaches presuppose a knowledge of the institutional structure of the systems. A knowledge of the structure of systems can help optimise the design. The extent of a contextual *verstehen* of political systems is essential - but apt to be smaller when dealing with very different kinds of systems. In spite of the fact that Dogan & Pelassy specifically discuss the possibilities of a most-dissimilar design on a nation-level (i.e. system-level), it is abandoned here in favour of *a most-similar design, which is in accordance with Lijphart's definition*. One of the tangible advantages of a most-similar design is that when entities are similar in many general respects, these respects can be neglected. Because they are similar, they should not contribute to explaining the dissimilar. In the same fashion, to generally disregard the dissimilar in search of explanatory similarity would require a perfect choice of systems, which practically is problematic; is not a perfect choice close to *a priori* knowledge of the conclusions? The complex relationships of political reality social science wants to capture seldom allows one to find similarity in asymmetrical political patterns. It is often easier to discern irregularities in symmetrical social patterns.

To be able deliberately to neglect certain similar aspects also implies that one of the classic problems of comparative research, that of a large number of potential explaining variables, is reduced to reasonable proportions.⁵⁰ Przeworski & Teune (however critically) conclude: "*The logic of the most similar systems design is based on the assumption that characteristics shared by one group of systems... can be removed in a quasi-experimental manner.*" In this case the overall scope of competence and dependence should be as similar as possible in the three determinants in the model, i.e. the two arrows in the model should be eliminated through the research design. Choosing a most-similar design is *de facto* close to this objective. At least it is a deliberate attempt to minimise the variance of other institutional factors in the systems.

⁴⁹ Ibid., p. 39.

⁵⁰ See Anckar 1992, p. 10 and Lijphart 1971, p. 686.

Minimising the variance of a number of institutional factors implies, as stated above, they can be neglected; *ergo* the arrows in the model are minimised. A most-similar design also undermines the argument that the study is concerned only with structural relationships. Other factors being as equal as possible, variance in the independent variables should cause variance in the institutional leadership profile.

*"When one analyzes a relatively small number of cases, one can be more thorough and more attentive to details that are likely to be overlooked in statistical analysis: one can make sure that concepts are not stretched, that the data are as reliable as possible, that the indicators are valid, and that the cases are really independent. These are enormous advantages which may well offset the relative weakness of the comparative method in handling the problem of control."*⁵¹

The Comparison of Systems

After the introductory methodological discussion it seems fruitful to undertake a comparison of political systems that resemble each other enough to isolate relationships between independent variables and the premiership. At this stage the comparison faces a three-fold question:

- 1) How many systems should be compared?**
- 2) Which systems should be compared?**
- 3) Specifically how should they be compared?**

⁵¹ Idem 1975, p. 172.

How Many Systems Should Be Compared?

According to Anckar,⁵² there are *three* general strategies for selecting the number of system-level units to be analysed. The first strategy is to compare two systems. This approach is common and is often referred to as a binary analysis.⁵³ A binary analysis is not necessarily an easy form of comparison because the number of compared entities is the minimum. Dogan & Pelassy make a distinction between *implicit* and *explicit* binary analyses.⁵⁴ With an implicit binary analysis they understand an analysis of one system through a repeated referral to another system (or systems): de Toqueville's reflections on America could be mentioned as a classic example of this approach. An explicit binary analysis implies a higher degree of systematisation, a comparison of two systems in detail. Here the emphasis lies on what Dogan & Pelassy refer to as a study in depth.⁵⁵ Based on the experiences of an earlier Master's thesis,⁵⁶ which also was concerned with the office of prime minister, it seems possible to penetrate a larger number of countries than just two without loosing the depth of the study (the vertical dimension). The second strategy discussed by Anckar is an analysis of a handful of systems, which Anckar specifies to be an analysis of three to five systems.⁵⁷ This strategy is well represented in political science.⁵⁸ A third strategy is to make a comparison of a large number of systems looking at certain variable/variables. This approach has been practiced *in extremis* by e.g. Blondel.⁵⁹ To study a large number of units cannot be the most fruitful approach when dealing with an institution like that of the prime minister, because the multitude of influencing variables that have to be accounted for would be too simplified.

Unless one wants to fall into the comparativist's pitholes described in 2.3.3.2, one depends on a sufficient holistic understanding, a *verstehen*, of the systems to be compared. Such an

⁵² Anckar 1992, p. 7.

⁵³ Dogan & Pelassy 1990, p. 126.

⁵⁴ Ibid.

⁵⁵ Ibid., p. 127.

⁵⁶ Holm 1992, see especially chapter 7 (unpublished Master's thesis).

⁵⁷ Anckar 1992, p. 7.

⁵⁸ Ibid. (concerns Nordic political science).

⁵⁹ See, e.g., Blondel 1980 and 1985.

understanding of the context is especially important in an analysis of an institutional nature. The more systems compared, the fewer are the aspects that can be neglected because they are alike (see 2.3.3.2 above). Therefore it seems reasonable to make a comparison of three to five systems, enabling a sufficient horizontal dimension without losing the vertical dimension, the depth.⁶⁰ Expressed allegorically, as by Dogan & Pelassy, one can say that by looking at two related systems one can see the difference between two trees, but one needs more trees to deliver a picture of the whole forest.

Selecting Systems: The Minimisation of System-Context Variation

The second dimension of comparison is the specific selection of systems. The systems it should be fruitful to compare must represent political systems that focus on the effective (as opposite from symbolic) executive power on the prime minister and offer the incumbents similar political prerequisites (as decided in 2.3.3.2). There should therefore be indicators that minimise the impact of 'undesired variables' and, thus, legitimises the comparison of the chosen systems. The systems should preferably be easily analysed in the sense that the prime minister can govern without (regular) interference from the head of state (compare the notion of effective executive power).⁶¹ Thus, semi-presidential systems ~~make~~ are left outside as the relationship between the executive key actors in semi-presidential systems often is managed through informal and unofficial means. This study is generally interested in systems with a ceremonial head of state, an apolitical president or monarch. The point of the analysis is to show how significant are structural factors in systems that focus on the prime minister. Based on earlier experiences,⁶² one fruitful means of optimising such a study is to analyse systems with dominant parties: defined by Sartori as predominant party systems.⁶³ A wide scale of parties and realistic coalition scenarios increases the difficulty of the undertaking, especially an analysis of the *prima facie* important party dimension.⁶⁴

⁶⁰ Cf. Dogan & Pelassy 1990, p. 19.

⁶¹ The concept is explained in, e.g., Sartori 1990.

⁶² Holm 1992.

⁶³ Sartori 1976.

⁶⁴ See, e.g., Jones 1991b, pp. 173-177.

Thus, one should pose general questions that put the selected systems on the same starting line as for the office of prime minister.⁶⁴ On what dimension should these questions lie? Both the prescriptive and the empirical dimensions are essential. Hence, the final selection of systems was made on the basis of two major dimensions, that of the constitution and that of the party system.⁶⁵ The questions must, however, be so broadly stated that one does not deliberately minimise the variance of the operative variables.⁶⁶ The seven criteria for the selection of systems were the following:

The Constitutional Dimension:

1) POLITICAL STRUCTURE OF THE STATE

The systems should be *unitary*, not federal.⁶⁷

They also have to have a clearly *democratic tradition* during the post-1945 era.

2) EFFECTIVE EXECUTIVE POWER

Should lie in the hands of the *prime minister/the cabinet*, not in a collective executive college, as in Switzerland, or shared by the head of state and the prime minister (NB. effective executive power).⁶⁸

the criteria continued

⁶⁴ In this context, cf. Dogan & Pelassy 1990, pp. 19, 113-118 on the need for what they refer to as 'segmentation'.

⁶⁵ Paloheimo uses indicators on these dimensions in idem 1984, pp. 225- 231.

⁶⁶ See Lijphart 1975, p. 162.

⁶⁷ See Weller 1985, p. 78 and Helander 1991, pp. 43-45. Federalism tends significantly to alter executive power relations. In federal systems provincial prime ministers might provide more interesting cases than the federal ditto.

⁶⁸ See also ibid., pp. 90-97 on the role of the head of state.

3) STRUCTURE OF PARLIAMENT

The parliament must be *unicameral* or represent a *weak bicameralism*, not represent strong bicameralism, i.e. a two-chamber parliament with similar powers in both chambers (but different methods of election).⁶⁹

4) POLITICAL ACCOUNTABILITY

The systems should adhere to *classic parliamentarism*, with possibilities for the effective executive power to dissolve parliament.⁷⁰

The Party Dimension:

5) POSITION OF THE PARTIES

The systems should preferably be *predominant-party systems*.⁷¹

(The party leadership aspect-the more nationally important the party is, the more the leadership aspects are enhanced [one-party regimes excluded]).

6) POLITICAL STABILITY

The political systems should not be too *unstable*, measured as average duration of cabinets during the post-1945 era (compare, e.g., Italy) and *identifiability*.⁷² A largely uni-dimensional political continuum is also preferable.

7) CONCENTRATION OF EXECUTIVE POWER

Cabinet formation should generally adhere to the principle of *minimal winning coalitions* (one-party governments if possible, see criterion 5).⁷³

⁶⁹ See Lijphart 1990, p. 74. The first and the third criteria are intertwined since federal states usually have a parliament that reflects the two-tier structure of the state (see, e.g., Parliaments of the World 1986, p. 14).

⁷⁰ See, e.g., Parliaments of The World 1986, pp. 1325-1326.

⁷¹ As defined in Sartori 1990, pp. 344-347 (see also the four indicators presented in Holm 1992, p. 38).

⁷² See, e.g., Budge & Keman 1990, pp. 160-161. On the latter aspect, see Strom 1990 and Shugart & Carey 1992, pp. 45-46. We require the systems to score at least .75 as for the identifiability (average .39 in Strom 1990), ie. in a given system the government formation responded to 75 per cent to the outcome likely of the election at the time voters went to the polls. See also the scoring in Bertrand 1981.

⁷³ Ibid., pp. 23, 34.

Based on these criteria some interesting cases, like the Netherlands and Spain, have to be dropped. On the party dimension the Netherlands does not fit in, and in Spain the lack of democratic leadership during a substantial period of the post-1945 era makes an adequate comparison difficult. Norway could have been an interesting case of Nordic parliamentarism, but looking at Norway, from both the constitutional and the party angles, the political system seems less fruitful to analyse. In Norway the parliament cannot be dissolved by the executive. Finland is a complicated case because of the dominant role played by the president under a long period of the post-1945 era.

Two different Westminster⁷⁵ systems fit in the scheme, Britain and the Republic of Ireland.⁷⁶ To contrast their two institutions of prime minister can be fruitful: Britain is the mother of classic Westminster parliamentarism whereas the Republic of Ireland represents something different - a modern presidential version of essentially Westminster-type government. Of the Nordic countries Sweden and Denmark fulfil the requirements (despite a humble score on stability for Denmark); they have both been dominated by social democratic parties in contrast with dominating conservative and national parties in Britain and the Irish Republic (the Irish parties are difficult to categorise).⁷⁷

Through this choice of systems, Britain, Ireland, Sweden and Denmark, there is a comparison in the footsteps of Lijphart's *Democracies: Patterns of Majoritarian and Consensual Government in Twenty-One Nations* (1984). The office of prime minister in two majoritarian systems is contrasted with the equivalent in two consensual Scandinavian systems. Lijphart also provides an interesting point of departure, all four systems represent different clusters of democracy in his work.⁷⁸ The dimensions Lijphart deals with are also highly relevant for the office of prime minister.⁷⁹

⁷⁵ On Westminster-systems in general, see, e.g., Mackintosh 1978, pp. 16-22.

⁷⁶ On the relevance of referring the Republic of Ireland to the category of Westminster-systems, see Chubb 1982, pp. 167-170, Arkins 1990, p. 90, O'Leary 1991, pp. 136, 139 and Farrell 1971, p. 2 and idem 1988, p. 33.

⁷⁷ Below the Republic of Ireland is simply referred to as *Ireland*.

⁷⁸ Lijphart 1984, p. 219 (table 13.3).

⁷⁹ Lijphart deals with executive power, parliaments, constitutions and party systems.

Before proceeding any further, there should be a check on how the selected systems match the dependent variable. No comparative study can be thoroughly carried out without first defining and measuring the dependent variable. If political systems do not differ on the dependent variable the problem of explanation is not comparative.⁸⁰ Are the systems selected without a simultaneous minimising of the difference of the operative variables? Here the study faces a problem of measurement. As nothing very similar has been carried out earlier, there is no model or typology easy at hand that could ensure a *de facto* institutional variance in the office of prime minister. As one cannot sidestep this question, it has to be answered through rather qualitative means.

From a pragmatic point of view such a preliminary check has to be carried out through a survey of literature. A brief check of determinants was made by using three authoritative references; Blaustein's & Flanz's *Constitutions of the World*, Katz's & Mair's *Party Organizations* and IPU's *Parliaments of the World*, the information in all of which encouraged this project. The system-differences stated in Blondel's model of leadership (*EJPR* 1980) and Lijphart's *Democracies...* (see above) also encouraged a continuation of the task. Weller's study of prime ministers in Westminster-systems also pointed at differences of an institutional character,⁸¹ which logically should be even greater when comparing different categories of systems.

Comparing the Selected Systems: A Matching-Pairs Approach

Now it is clear which systems' premierships will be compared. Still it should be possible to optimise the design for the key variables. An explicit binary analysis is a detailed comparison of two systems. If choice of a most-similar design is combined with a binary analysis, one arrives at a matching-pairs analysis. The utility of the design can be optimised through such a design: in other words several explicit binary analyses. A binary analysis is an optimal most-similar design as the less systems one compares at a time, the more aspects are there that can be neglected because they are alike, i.e. the cross-system reliability increases when the number of analysed systems decreases. By analysing systems in matching pairs, the study secures a sufficient level of system-context *verstehen* which equals to validity in each system. The smaller the number of

⁸⁰ Przeworski & Teune 1970, p. 78.

⁸¹ Weller 1985.

systems, the better are the possibilities of using the same determinants across systems (otherwise different systems may require different operationalisations to measure the same thing).⁸²

If a relationship is confirmed as a result of a most-similar design one gains some encouragement about the generality of the relationship.⁸³ However, one cannot make more than three or four matching-pairs analyses. The needed knowledge poses a problem - as does the actual number of relevant matching pairs to be found in the real world. Therefore the study undertakes an analysis of the differences and similarities of a *Westminster block* consisting of Britain and Ireland (majoritarian systems) as well as an analysis of a *Nordic block* consisting of Sweden and Denmark (consensual systems). The analysis could also have been expanded to include a semi-presidential systems block, for which France and Finland would have been an interesting pair of systems. As a synthesis, at a later stage, the study compares the differences and similarities between these two blocks of systems. It is here assumed that through a matching-pairs approach one can gain on the vertical dimension. The depth, or here mainly intra-system relations, is more likely to stand out in binary analyses. The study will comprise two binary analyses and eventually combine them in a synthesis with ambitions to generalise.

⁸² Another aspect is that if one really is interested in explaining patterns of relationships, rather than nations, one could use different sets of nations for the explanation of different determinants (eg. systems A,B,C and D when looking at the constitutional impact on the office and systems E,F,G and H when looking at the impact of party leadership on the office).

⁸³ Przeworski & Teune 1970, p. 38.

2.3.4 Some Problems and Delimitations

Some potential pitfalls of comparing similar systems, especially systems geographically closely related, should be considered. Close geographical connection is not only an advantage: one notable pitfall is the so-called Galton's problem.⁸⁴ In brief the essence of this problem is that scientific relationships found in several countries *de facto* are the same thing. The measured phenomenon is a result of diffusion between the countries. Every system where X causes Y this does not add more proof for or against a theory. It is simply the same thing measured over and over again in different systems. This problem has been evident in sociology and anthropology. As an example, one can think of the observation of several tribes which seem to have similar customs. These similar customs derive from a common source.⁸⁵ In political science this problem appears especially when comparing policies in different nations. This study looks at basic entities that are less likely to be victims of practical diffusion in the same way as policy decisions. The two Westminster systems have a common political background only in the form of Westminster-type government. There are also important differences on a system level. The same is valid when looking at the two Nordic countries, Sweden and Denmark. The risk of falling into a 'Galtonian trap' should be greater when looking only at, for instance, the Nordic block. A sufficient comparative perspective contributes to minimising this pitfall. The greater the number of systems analysed, the greater is the scope of reference but the number of aspects that can be neglected because they are alike rapidly decreases with a larger number of systems).

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For party aspects (party structure, -organisation and methods of intra-party elections), which could pose a potential Galton problem, especially parties in different countries representing the same ideological values, an attempt to minimise this risk was made by making a brief and introductory comparison of the information provided by Katz & Mair (e.g. the '*party organograms*').⁸⁶ Based on that information the choice of nations did not seem to pose a problem. When the similarities are too far-reaching there is also always a risk that the operative variables get too similar, not only the variables that are to be controlled.⁸⁷ By the means above the study tries to minimise this risk.

⁸⁴ See Scheuch 1990, p. 28 and Anckar 1992, pp. 13-15.

⁸⁵ Ibid., p. 28. See also Przeworski & Teune 1970, chapter 5.

⁸⁶ Katz & Mair (eds.) 1992, pp. 199-272 (Denmark), 389-457 (Ireland), 781-870 (Sweden and the United Kingdom).

⁸⁷ See Lijphart 1975, p. 163.

When one analyses a political institution the comparison must be given certain scopes of reference,⁸⁸ for instance a limitation in time. In this study the institution is analysed in modern times, that is *after* 1945. This choice of time perspective can be defended in several ways. During the post-1945 era the concerned political systems have been stable, without any significant periods of exceptionality. The more normal the conditions under which the comparison takes place, the greater is the comparability.

2.3.5 The Material

This study is a comparative institutional analysis. Therefore the basis of the work is not any easily defined piece of empirical material. It is built on several elements. The basis of the work has been an extensive survey of literature and references. The quantity of sources will have to compensate for the difficulty of making, for instance, mathematical reliability tests on this study. Below follows a brief account of literature essential to this work.

The constitutional analysis has the constitutions and associated law and political science literature as its base. The party dimension is addressed through party statutes collected from the party offices, interviews, correspondence and a large number of relevant monographs. In addition, the thesis studies the national press, especially for an examination of the reasons for cabinet termination, utilizing the *Financial Times Profile*-database. The primary material of that particular variable has however been data in *Keesing's Contemporary Records*⁸⁹, a British database, and *Facts on File*, which is the American equivalent. The choice to use both sources was made to achieve as good a reliability as possible. In unclear cases the national press was seen as normative (which the news digests after all are made up of). There was also a comparison with the data provided by von Beyme.⁹⁰ In addition to monographs and some interviews/correspondence with party officials (in Sweden and Denmark, see a full list in the bibliography section), major reference works have been used, especially in dealing with the parliamentary aspects of the office

⁸⁸ Przeworski & Teune 1970, pp. 31-32.

⁸⁹ Formerly known as *Keesing's Record of World Events*.

⁹⁰ von Beyme 1985.

of prime minister. Amongst them are one finds *Parliaments of the World* (two volumes⁹¹), *The International Almanac of Electoral History*, Truhart's *Regents of Nations* (three volumes) and *State, Economy and Society in Western Europe 1815-1975* (two volumes) by Flora *et al* (the first volume is especially of interest for political scientists). For the party studies section Katz and Mair's *Party Organizations* proved to be indispensable.

The bibliography section at the end of this study is based on a division of the material into primary and secondary sources and provides an exhaustive list of sources for this work.

⁹¹ *Nota Bene*: The 1986 edition of *Parliaments of the World* is substantially enlarged in comparison with the one-volume edition of 1976.

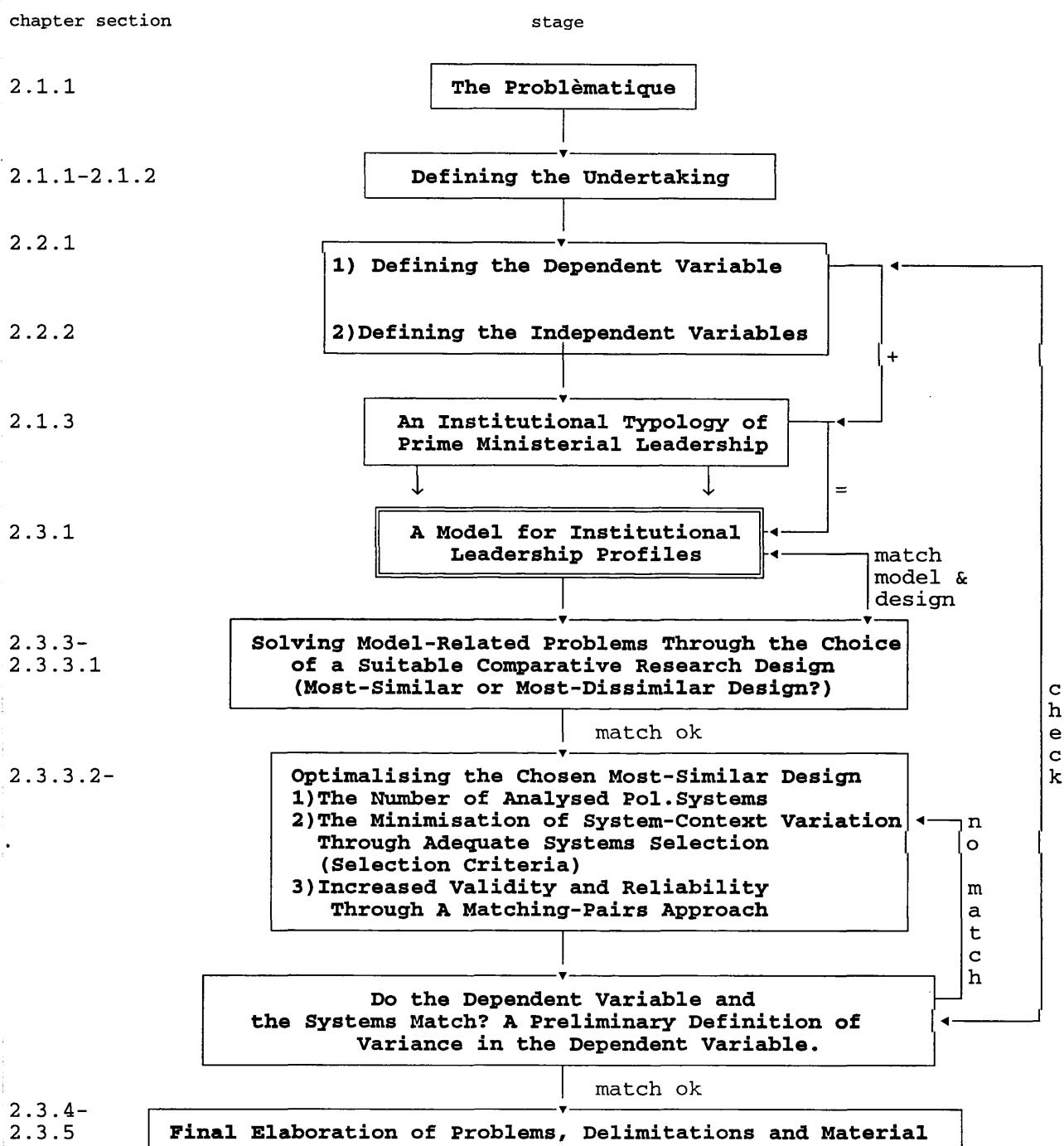
2.3.6 A Concluding Outline

The aim is to analyse comparatively the office of prime minister with the presumption that institutional differences between political systems create different prerequisites for the office, and that this can be discerned as different 'power relationships' or even policy outcomes.⁹² As independent variables, that affect the prime ministership, the study focused on three relatively independent veto-dimensions, or sets of variables, which each can nullify the other two dimensions: the *constitutional dimension*, the *party-political leadership* and the broad dimension of *cabinet practice*. The variance of the dependent variable, here called the *institutional leadership profile*, was defined with the help of a two-dimensional typologisation: the scope of competence and the scope of dependence on other actors. As a synthesis of the independent variables and the variable to be explained, a two-dimensional model with three determinants (model 3) was created. This model defines eight basic institutional profiles of leadership.

After a methodological deliberation it seemed fruitful to make an analysis based on a *most-similar systems* design. Seven criteria were set up on a system level as an attempt to keep control variables constant and select suitable political systems for the analysis; Britain, Ireland, Sweden and Denmark were chosen. As a means of optimising the most-similar design, these systems will at first be analysed in two blocks according to a *matching-pairs design*: a Westminster-block consisting of Britain and Ireland and a Nordic block consisting of Sweden and Denmark. A third block, or matching pair, could be introduced at a later stage as a possible expansion of the thesis. The most intriguing addition would be that of a semi-presidential block (consisting of e.g. France and Finland). Semi-presidential systems do not fit the model entirely, but after analysing the two other blocks it would be of interest to explore similarities and dissimilarities with semi-presidential régimes. The overall aim is to apply the theoretical framework on the selected nations. When this task is completed one can either glance backwards and elaborate the reasons for the present leadership profiles, or look forward and discuss their implications for the future.

⁹² See Rose 1991.

Flow Chart 1. TOWARDS A THEORETICAL FRAMEWORK FOR ANALYSIS



3. THE PRIME MINISTER AND THE CONSTITUTION

"The State is a human grouping in which there rules a certain power relationship between the individual and associated constituents. This power is embodied in political institutions. The system of fundamental political institutions is the Constitution."

H. Finer 1970¹

3.1 Initial Definitions and Classifications

By way of introduction to the analytical part of the thesis, this chapter is devoted to the role of the constitution. If one is to assess the institutional framework of the office of prime minister it is appropriate to begin with the normative constitutional role. One need not be an institutionalist to acknowledge that the constitutional arrangements constitute the fundament of the institutional leadership profile. In 1988 Bogdanor wrote:

"What is clear is that the functioning of democratic institutions has become intertwined with the working of constitutions to an extent which could hardly have been imagined twenty or thirty years ago. It has become increasingly the case, therefore an understanding of the role which the constitution plays in a country's politics is vital to an appreciation of the working of modern democratic government.".²

This chapter begins with a general perspective on the constitutions, dealing later with the constitutional properties and problems of the prime ministership in Britain, the Republic of Ireland, Sweden and Denmark. After dealing with two binary analyses (the Westminster block and the Nordic block), the study will draw conclusions and compare the different constitutional profiles of the office. The task is to explore the different paths and possibilities that the constitutions enable, or disable, for the prime minister.

¹ Finer 1970, p. 116.

² Bogdanor 1988a, p. 2.

The introductory quotation is a general definition of the term constitution - proposed by Finer in 1962.³ In this study, the constitutional particulars concerning the premierships need to be examined and, thus, a structural classification is needed.⁴ One can start with the basic categorisation of codified and uncodified constitutions (for which the less relevant dichotomy of written versus unwritten constitutions is used).⁵ The United Kingdom is among the few democracies in the world that has an uncodified constitution,⁶ the other three analyzed nations all have codified instruments of government. The British have emphasised *jus*, where most other countries have leaned on *lex*. Whether codified or uncodified, a more meaningful dichotomy is that of laws versus conventions. Dicey argued there exists a profound principal difference between constitutional laws, whether written or unwritten, that are enforced by courts - as opposed to constitutional conventions that are not.⁷ Even though this distinction has had its critics, it will later be shown it might be of importance in a comparative study.

Constitutions can accordingly be classified in a variety of ways.⁸ Wolf-Phillips proposes several useful classifications in his *Constitutions of Modern States*.⁹ Referring to Bryce, Wolf-Phillips makes a classic, and general, distinction between *rigid* and *flexible* constitutions. This dimension distinguishes between two broad classes of constitutions. The former includes newer statutes

³ See also Wolf-Phillips 1968, p. x. Wolf-Phillips emphasises another definition put forward by Bryce as early as 1884, which also has been sanctioned by Strong (Strong 1963, p. 12). He defined a constitution as "*a frame of political society, organised through and by law; that is to say, one in which law has established permanent institutions with recognized functions and definite rights.*"

⁴ See van Marseveen & van der Tang 1978, pp. 244-262 and Strong 1963, pp. 59-79 for different but thorough discussions on constitutional classification.

⁵ Wolf-Phillips 1968, p. xi.

⁶ Bogdanor states that there are two other democratic nations lacking a codified constitution, namely Israel and New Zealand. Idem 1988a, p. 3.

⁷ Dicey 1959, pp. 23-24.

⁸ For a classic review, see Strong 1963, especially pp. 59-80.

⁹ Wolf-Phillips has been criticised for his classifications, see van Maarseveen & van der Tang 1978, p. 250. They end up with a very positivistic definition on page 234 (*ibid.*).

which stand above the other laws of the nation, which is the criterion of constitutional rigidity.¹⁰ The latter includes older constitutions leaning on custom (compare *jus* versus *lex*), of which Britain is the archetype.¹¹ Bryce himself put it as follows:

*"Constitutions of the older type may be called Flexible, because they have elasticity, because they can be bent and altered in form while retaining their main features. Constitutions of the newer kind cannot because their lines are hard and fixed. They may therefore receive the name of Rigid Constitutions."*¹²

The continuum of time is relevant as Britain represents a very old and flexible constitution whereas the Republic of Ireland, Sweden and Denmark represent modern and rigid constitutions. A constitution determines the character of the institutions that collectively constitute the state. The relevance for the premier lies in the fact that a flexible constitution gives a prime minister opportunities to intervene in almost all policy areas. But is it therefore correct to assume that the more rigid a constitution is, i.e. institutionalises responsibilities (especially if it does so in other parts of government), the more the prime minister is distanced from specific policy-making?¹³

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The classifications and categorisations touched upon above are broad. Almost all aspects of parliamentarism are in some respect of interest when dealing with the office of prime minister. The level of abstraction should be decreased and tangible questions posed. One has to keep in mind the necessity of keeping the number of variables small in comparative politics, as was concluded in the preceding chapter on method. The approach will therefore be to make a number of specific comparisons of constitutional instruments between the systems rather than to make comparisons of the constitutional systems.

¹⁰ See Strong 1963, p. 153.

¹¹ Ibid., pp. 67-68 and 135-170.

¹² As quoted in Wolf-Phillips 1968, p. xiii. See also Strong 1963, p. 68.

¹³ See also Brazier 1991, p. 453 and Blondel 1987, pp. 149-150.

One ambition is to clarify whether the head of state is intervening, or, more adequately, *can* intervene in parliamentary affairs and thus be a political agent. In choosing the nations to be analyzed, one of the objectives was to deal with nations where the distribution of the executive leadership is clearly focused on the prime minister. However, the distinction of rigid versus flexible constitutions requires the study to enlighten the role of the head of state. All political systems have a head of state, which most often is separated from the office of head of government. This thesis's interest is in the latter and, thus, in the definition of when these two offices potentially collide with politically significant results.

Heads of state are either monarchs, as in Britain, or presidents, as in the Irish Republic,¹⁴ both of which have opportunities to exercise certain political powers. However, we have to introduce and emphasise the qualitative dimension of exceptionality. Generally, the remaining royal prerogatives¹⁵ are being distanced from the monarch, who exercises his/her discretion only under highly exceptional circumstances. This statement is valid for the Irish head of state, but less so since a codification of governmental instruments has institutionalised the involvement on a level closer to daily politics than with the monarchs. The role of the heads of state can be ceremonial or political. These categories do not by any means exclude each other (rather the contrary), but are *de facto* intertwined on a very few occasions. The political powers of the head of state are exercised as the highest authority, a *res judicata* of national politics. Does this ultimate source of political power bear any significance for certain important conjunctures of national politics? However, before engaging in a detailed comparative analysis the chapter paints a background to the present constitutional arrangements.

¹⁴ Other possibilities are also feasible, for example emperors or Grand Dukes.

¹⁵ See chapter one on the background of the office of prime minister.

3.2 The Constitutions: A Brief Background

3.2.1 Westminster Systems: Britain and the Republic of Ireland

Constitutionally the oldest prime ministership in the world still remains little but a convention. However, when one talks about a British constitution, one has to bear in mind the inadequacy of speaking of an unwritten constitution. The central elements are not united in one document. The British have always taken the view that there is no need for, or virtue in, an enacted constitution.¹⁶ Bogdanor posed the question of whether the British ever have had the need to summarise their historical experiences in a fundamental document.¹⁷ A constitution is usually united with a special event, even the birth of a nation, which can be defined for Britain only with difficulty. Central norms can be found in the *Acts of Parliament*, for instance election rules (in *Representation of the People Act 1948*) and parliamentary rules (in *Parliament Acts 1911/1949*). Of great importance is the *Ministers of the Crown Act* from 1937. This act for the first time established a (minimalist) legal status for the prime minister, fixed salaries and recognised the leader of the opposition. The British constitution is often divided into five main parts, of which the fifth includes *conventions*, central politico-legal norms. Even if the amount of legislation that can be seen as central is large, it does not specifically mention the prime minister, the cabinet or political parties, the exception being salary regulations, like that of the *Ministers of the Crown Act*.¹⁸ Of great importance are the political traditions of the common law, which are characteristic of Britain.¹⁹ The essence of having an uncodified, partly unwritten, constitution is that the jurisdiction does not impose formal limitations on the power of parliament. To be precise, the constitution does not impose any formal limitations on the power of the ruling

¹⁶ See, e.g., Bogdanor 1988b, p. 54 and Wolf-Phillips 1968, p. 182.

¹⁷ Bogdanor 1988b, p. 54. For another perspective see the articles in *Parliamentary Affairs* no. 4/1991 (special issue on constitutional reform, especially the entries by Ridley, Smith and Cornford).

¹⁸ Ministers are mainly mentioned in salary laws, like that of 1975 (*Ministerial and other Salaries 1975*). Central British legislation and further references in Marshall 1984 and Wolf-Phillips 1968, pp. 182-201.

¹⁹ See, e.g., Kesselman & Krieger 1987, p. 65.

parliamentary majority; the implication is that the gist of the British system is full parliamentary sovereignty (no parliament can legally bind its successor). Thus, there is no distinction between law and constitutional law and there are no laws attached to which are requirements about special procedures of amendment or repeal ("What the Queen in Parliament enacts is law"). In Constant's words, no *pouvoir neutre* beyond parliament is to be found in Britain (see, however, the role of the head of state below). Looking only at this politico-legal fact one could foresee a theoretical danger in the possibility of a unilateral overthrow of existing conventions.

Another essential point in the British model is majority rule.²⁰ Expressed as the distance between the legislative and the executive power, the distance is monistically minimal, especially with one-party majority cabinets, thus Montesquieu's warning: "... *when the legislative and executive powers are united in the same person or body of persons there can be no liberty, because of the danger that the same monarch or senate should enact tyrannical laws and execute them in a tyrannical manner*".²¹ Nevertheless, British politics has been held on a traditional socio-economic left-right dimension,²² without the need to elaborate fundamental changes in the political rules of the game.²³ The true exceptionality of the British case, at large and in detail, is only revealed in a comparative scrutiny.

The Irish constitution can, in contradiction to its British counterpart, distinctly be associated with the evolution of a nation.²⁴ Even so distinctly that the present constitution of 1937 is the successor of two previous constitutions that reflected the conceptions of their time. The first of these instruments was the constitution of the Dáil Éireann, enacted in 1919. This constitutional document created the structure of a would-be British-style cabinet government at the outset of

²⁰ No government with an overall parliamentary majority has lost a vote of confidence in peacetime since 1895.

²¹ As quoted in Strong 1963, p. 235.

²² See Lijphart 1990, p. 73.

²³ See, e.g., Bogdanor 1988b, pp. 57-59 and Kesselman & Krieger 1987, pp. 64-71.

²⁴ Chubb 1966, p. 7.

the war of independence and was, in the words of Chubb, an arm of an independence movement.²⁵ As a constitution it was short and unpretentious and did not contain such elements of republicanism as a president or legislative committees.²⁶ The second, the constitution of the Irish Free State of 1922, marked the full emergence of the state and was, thus, a part of the outcome of the success of the independence movement. This more detailed constitution was a compromise between the American-influenced Irish republicanism and elements demanded by the British government. The Irish constitution-makers of 1922 had a desire to emphasise the role of the people. This accent can today be recognised in several constitutional instruments, in the provisions for referendum, in the possibility of judicial review of the constitution, the multi-party system through single transferable voting (STV)²⁷ and the rules of appointment of ministers. The cabinet of the time, the Executive Council - headed by a president, was meant to be rather weak although the office of the present president and the prime minister were combined in this institution. At the time an Executive Council defeated in the parliament was prohibited from dissolving it. The role of the President of the Executive Council was that of a ministerial *primus inter pares*. However, the Executive Council could act rather like a British cabinet. Many parts of the 1922 constitution were also amended.²⁸

In 1932 Fianna Fáil deputies of parliament, former anti-treaty deputies [Anglo-Irish Treaty of 1921], were the largest grouping in the Dail and formed a cabinet with their leader, Mr de Valera, as President of the Executive Council. Fianna Fáil was disappointed with the constitution of 1922, particularly with the Commonwealth status and symbols. The cabinet type of government, on the contrary, was not that much a matter of dispute,²⁹ although Mr de Valera's intent was to make the new prime minister more powerful than the earlier president.³⁰ Mr De Valera was the driving force behind the new, present constitution, enacted in 1937.

²⁵ Ibid.

²⁶ O'Leary 1991, p. 139.

²⁷ For details on the electoral system see, e.g., Chubb 1982, pp. 350-353.

²⁸ O'Leary 1991, p. 140.

²⁹ Chubb 1966, p. 25.

³⁰ O'Leary 1991, p. 140.

This constitution, *Bunreacht na hÉireann* - the constitution of Ireland, is rigid in its nature. This feature is seen in the functions of the president. The role of the president is primarily a guardian of the constitution, a *pouvoir neutre*. The president can exercise this role in two principal ways. He/she may, under certain circumstances, submit a bill - passed by parliament - to the people in a referendum,³¹ or refer it to the Supreme Court to decide on its constitutionality before signing.³² Both possibilities can be most effective means of throwing spanners in the works of the government. In most nations the control of the constitutional validity takes place before or when a bill is introduced to parliament³³ Ireland adheres to an additional *a posteriori* control, which could result in policy alterations that prove unpleasant for the government (as almost all initiatives in Ireland come from government).³⁴ Strictly rigid is the constitution in its statement that any amendment to the constitution requires approval at a referendum (after having been passed by both houses of parliament).³⁵ Thus interesting contrasts emerge in comparison with the British constitution. As a general characterisation one can quote the words of Farrell: "*This robust republicanism is, however, disciplined within the customary institutional restraints of a Westminster-style cabinet government.*".³⁶ OL

³¹ There has been a referendum in Ireland on at least six occasions (Keesing's Contemporary Archives; various years).

³² Articles 12-14 of the constitution of Ireland deal with the presidency. Articles 26-27 with the reference of bills to the Supreme Court and to the people through referendum. The president may submit a bill to the Supreme Court only after hearing the Council of State on the matter (26:1.1). To submit a bill to referendum the president must have the support of a majority in the Seanad and not less than one third of the Dáil (27:1).

³³ See Parliaments of the World 1986, p. 1307.

³⁴ Conflicts between the government and the president/Supreme Court have occurred, see, e.g., Chubb 1982, p. 200 (on the case of president O Dálaigh 1976).

³⁵ Article 46 of the constitution. That any amendment to the constitution requires a referendum can be an advantage for the cabinet over the presidential possibility of submitting a bill to the Supreme Court. If a cabinet wishes to insist on a particular provision declared unconstitutional it can submit it to the electorate through a referendum.

³⁶ Farrell 1988, p. 33.

3.2.2 Nordic Constitutionalism: Sweden and Denmark

Sweden today has a very modern constitution, it is in only its third decade. The old *Regeringsformen* of 1809 was in use until a two-phase reform started 1968-1969 and was completed on the first of January 1975. The aim here is not to engage in a comparison of the old regulations and the new constitution, but to note aspects relevant for the office of the Swedish *statsminister*. Every-day parliamentarism was unregulated under the old constitution of 1809.³⁷ The present Instrument of Government is comparatively detailed and typical of modern rigid constitutions (e.g., amendments to the constitution must be accepted by a majority in two consecutive parliaments).³⁸ Nevertheless, the reform did not dramatically alter the position of the prime minister. The greatest, indirect, impact on the office was caused by the destabilisation of the party system - and the Swedish parliamentarism that occurred as a consequence.³⁹ According to Sannerstedt & Sjölin the political situation was altered as the parliament became unicameral, especially for the ruling Social Democrats. The Social Democrats had a 'constant' majority in the First Chamber (which was elected by the county councils [swedish *landstingen*] and was the chamber of less importance). The statutes of the old constitution stipulated that joint voting should be decisive if the two chambers were of a different opinion on, for instance, budgetary issues. This stipulation practically omitted the possibilities of forming a government without the Social Democrats.⁴⁰ Von Sydow described Swedish pre-reform parliamentarism in the following way:

*"Swedish parliamentarism was characterised by two different proportional systems of election to the two chambers of parliament, and in it by five parties grouped as a latent two-block system."*⁴¹

³⁷ von Sydow 1990, p. 81.

³⁸ For a comparative contents analysis, see van Maarseevel & van der Tang 1978.

³⁹ See Ruin 1988, p. 311 and Sannerstedt & Sjölin 1990, p. 92.

⁴⁰ Ibid.

⁴¹ von Sydow 1990, p. 77 (translation from the Swedish original by the thesis' author).

Through the partial reform of 1968-1969 the two-chamber parliament was replaced by a unicameral *Riksdag* and a proportional method of election, together with a common day of election for the parliamentary- and municipal elections. The second phase of the reform focused on rewriting the constitution, mainly during 1973-1974,⁴² and the new constitution, the Instrument of Government took effect on the first of January 1975. Apart from the structural realignment mentioned above, the most important part of the reform, especially for the prime minister, was the formal abolition of the political powers of the Crown. The role of the head of state was diminished to being only representative and ceremonial.⁴³

Earlier the head of state appointed a prime ministerial nominee and, under certain conditions, acted as decision-maker on some governmental issues. Theoretically it was even possible for the Crown to dismiss the prime minister.⁴⁴ Through the reform the Crown was excluded from politics, and role of the Speaker (chair) was highlighted. Thus we already are able to respond to one of the fundamental queries of this chapter: the Swedish Crown has virtually no opportunities to intervene in the political scene. However, the situation is far from similar to Britain. The Speaker of the Swedish parliament acts as *pouvoir neutre*. The strong emphasis on the office of the Speaker was caused by two basic factors: the abolition of the First Chamber and the fact that the Speaker took over the political duties of the head of state.⁴⁵ This feature is significant for the Swedish constitution. Earlier only inter-war Estonia had used this practice.⁴⁶ Today the Speaker puts forward prime ministerial nominees to parliament after consultation with the parliamentary parties.⁴⁷

⁴² See Sterzel 1983.

⁴³ According to chapter 5:1, the cabinet can convene under the chairmanship of the head of state, which implies certain limited possibilities of political influence (e.g. the making of the agenda).

⁴⁴ Wahlbäck 1984, p. 161.

⁴⁵ See the critical aspects on the office of the Swedish Speaker in Bogdanor 1984, p. 68.

⁴⁶ Holmberg & Stjernquist 1976, p. 105.

⁴⁷ Chapter 6:3 of the Instrument of Government.

Like Sweden, *Denmark* is a hereditary constitutional monarchy with traditions of a democratic constitution that dates back to the 19th century. After World War II the Danes increasingly realised the need to modernise their old charter of 1849, which was amended for the last time in 1920. Accordingly a new constitution was enacted in 1953, and is still in force. The bicameral *Riksdag* was succeeded by the unicameral *Folketing*, elected by proportional representation. As a partial substitute for the abolished second chamber, extensive opportunities of using the instrument of referendum is guaranteed by the constitution. Most bills can be subjected to referendum if one-third of the MPs require it. The constitutional practice could superficially be thought to bear a great resemblance to its counterpart in Sweden because of very many similar societal and, earlier, political characteristics. Yet it is not so.

By its basic character the Danish constitution is a representative of rigid constitutions. The procedure for constitutional amendment is lengthy and complicated.⁴⁸ As a result no amendments have been made since the constitution took effect in 1953. Decisions are mainly reached through consensus. A distinctive feature of the Danish way of government is the tradition of countersignment, which the constitution prescribes in article 14.⁴⁹ Every decision is countersigned by a minister, who thereby bears the sole responsibility for the concerned decision. This procedure is an effective means of distancing the Crown from politics. There is also a strong Danish tradition of individual ministerial responsibility. Ministers are direct instruments for the execution of parliament's policy. The constitution does not mention any office of deputy prime minister; nor are there deputy ministers (ministers of state) in the Danish system.

⁴⁸ An amendment must be adopted by two consecutive parliaments, whereupon it must be supported by a majority of the MP's voting and in addition supported by 40 per cent of the total electorate in a referendum. See part X (article 88) of the Danish constitution.

⁴⁹ See, e.g., Fitzmaurice 1981.

3.3 The Constitution: Prime Ministerial Property or Problem?

3.3.1 The Procedures of Government Appointment

3.3.1.1 The Cases of Britain and the Irish Republic

There are only two principal ways of being appointed prime minister, either by parliament or by the head of state. In most cases both agents play a role, with the former being the decisive agent and the latter the ceremonial. In parliamentary systems the role of parliament should, by definition, be decisive, the basic logic being that the prime minister is a person who can form a government that will enjoy the confidence of parliament. However, a variety of practices exists as there are a varying number of stages involved in the process of designating a head of government. This diversity is of significant importance for the prime minister, as will be shown below.

The constitutional embrolios of appointment are so closely intertwined with resignation that one has to deal with the two at the same time. Many constitutions, like the Irish, deal with appointment and resignation in the same article. There are three ways for a prime minister to leave the office:

- A)** A personal resignation from the cabinet (i.e. colleagues remain in office)
- B)** A resignation of the cabinet *en masse*
- C)** To pass away while in office

In Britain the appointment of prime minister is a royal prerogative which by convention⁵⁰ rules that the monarch shall appoint a person that enjoys the confidence of parliament - the party

⁵⁰ The distinction should be made as a prerogative may not only be initiated by convention, but also overruled, as with the power of the monarch to dismiss ministers. See Bogdanor 1995, pp. 84-103.

leader that commands a majority in the Commons. More precisely, in the words of Butler, there are two core rules of appointment⁵¹:

Rule 1: If a party is defeated in an election, the sovereign sends for the Leader of the Opposition in the previous parliament, especially if it is now the largest party.

Rule 2: The Sovereign sends for the leader most likely to command a majority in the House of Commons.

In a majoritarian system the first and third category of resignation (A and C above) do not imply the resignation of the cabinet *en masse*, situation B. Hence, the appointment of a prime minister in Britain does not theoretically pose a problem in the aftermath of situation A or C above. There is almost no room for royal discretion since the caucus of the governing party/parties designates a new leader (to be appointed by the monarch). The only exception is introduced by the dimension of time. If the governing party/parties for whatever reason are unable to come forward with a new candidate within a reasonable time [undefined], the monarch could be assumed to confirm the authority of a caretaker (a senior minister), or, highly theoretically, to appoint a person for the post.

Scenario B (resignation *en masse* or, strictly speaking, the often preceding event of a general election) poses a problem which is not entirely theoretical. If no party commands a majority in the Commons and there is a classic stalemate of three parties with minimal coalition preferences, then Butler's two rules can contradict each other. This could be a situation in which a coalition of two parties will always outnumber the third party, or, as likely in Britain, there is a stalemate with two large parties, of which the smaller is prepared to enter a coalition with a third party to outnumber the largest. If the head of state decides that rule number one is the more important, it will have the consequence of appointing a prime minister and government that is in a considerably weaker position than if rule number two (the commanding of a Commons majority) would be the highest preference, especially if the presently largest party up until then has been in opposition.

⁵¹ Butler 1986, p. 92. See also Bogdanor 1995.

There is also another, third, solution, which minimises the discretion of the monarch. Again the dimension of time enters the game. Once a government is established, the monarch has no reason to alter the balance, even if the prime minister resigns (i.e. the governing party simply stays in office long enough, most likely with the implicit or explicit consent of a third parliamentary party).

When one compares the situation in *Ireland*, there are considerable differences and problems in the practice of prime ministerial appointment. Article 13 of the Irish Constitution divides the formation of the government into two phases, which is of relevance in a multi-party system. The Taoiseach is appointed by the president, on the *nomination* of the Dail (article 13:1.1). Thus, the Taoiseach is a *formateur* at the first stage, as article 13:1.2 states the president, on the nomination of the prime minister - with the previous *approval* of the parliament, shall appoint the other members of government. In Britain the crucial process of government formation takes place *before and at* the appointment of the prime minister, whereas the latter stage, the structure and composition of the *formateur's* proposal is decisive in the Irish Republic. After a general election there is a period of about two weeks between the election and the summoning of the new parliament in which the TDs explore the different possibilities of forming a cabinet.⁵² In many cases this approval of the Dail has nevertheless been of a formal nature, particularly when the election settles the issue by providing a grouping with a parliamentary majority. After a usually short and formal debate⁵³ the leader of the majority party is appointed to office by the president. The prime minister then puts forward the names of his cabinet, which is approved by parliament *en bloc* and thereafter appointed by the president.⁵⁴ Hence, the British practice differs from the Irish also in that the prime minister appoints his cabinet without any formal part directly played by parliament (save the procedures at the Queen's Speech).

⁵² Ward 1990, p. 375. No provisions in the constitution explicitly state that inter-party consultations must take place, which is the case in many other nations; this is of interest with regard to the electoral system which, with a high likelihood, produces a coalition outcome.

⁵³ Chubb 1982, p. 183.

⁵⁴ Ibid., p. 184.

To the direct question of political discretion of the head of state, the answer is that there exists none in Ireland, whereas the scenarios in Britain are more sensible, but entirely unexplored. The fact that the prime minister in Ireland, in practical terms, is appointed by parliament brings with it certain constitutional queries. At present⁵⁵ the president cannot, as an exception to the rule in republics, play the role of a *pouvoir neutre* and kingmaker in a parliamentary stalemate, which may occur in Ireland because of the electoral system.⁵⁶ The paradoxical difference in comparison to Britain is that the British Crown, different from the Irish President,⁵⁷ theoretically could play the role of a *pouvoir neutre* but the two-party system to a great extent makes it unnecessary. The possibility of having a parliament where each of three major candidates of the office of prime minister can be defeated by the combined strength of the two others is real in Ireland. The conclusion is that to be appointed by a *neutral power*, as being the person most likely to secure the confidence of parliament, would be an effective means of enhancing prime ministerial authority. This track is, however, not possible in the Irish Republic and a theoretical possibility in Britain.

The difference in comparison to semi-presidential systems is that a neutral appointment gives the appointee a certain personal weight. In semi-presidential regimes, like France and Finland, the implications are often more far-reaching: the appointment has also meant a political instruction that determines the party composition of the cabinet, even in case of coalitions.

⁵⁵ Parliamentary committees have discussed other procedures, see Ward 1990, p. 374.

⁵⁶ Such a stalemate has, e.g., occurred in 1948, 1989 and 1991. On the electoral system of Ireland (stv) see Chubb 1982, pp. 83-117 and 142-166, Lee 1989, pp. 540-548 and on the party system Mair 1987, especially pp. 12-93 and 207-229.

⁵⁷ See Ward 1990, p. 375.

3.3.1.2 The Cases of Sweden and Denmark

It is chiefly in the sixth chapter of the Swedish Instrument of Government the prime minister is mentioned. As a result of this new constitution, the making of a Swedish prime minister differs from the practice in many other political systems. The Instrument of Government binds the prime minister tightly to parliament. The provisions for nominating a prime minister are in article 6:2-4. The Speaker gathers representatives of the parliamentary parties to negotiations according to article 6:2 (which is codified practice, as opposed to the practice in the UK, Ireland and, as will be shown, in Denmark). After these negotiations the Speaker must hear the Vice-Speakers and then puts forward a prime ministerial nominee to the *Riksdag*. The following vote of investiture in parliament is of foremost constitutional interest. It takes the explicit form of negative parliamentarism in article 6:2. For the prime ministerial nominee *not* to be approved by parliament, a majority of the (voting) MPs openly have to disapprove of the nominee.⁵⁸ The disapproval is explicit in the sense that there is a chance to abstain from voting.

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A similar negative majority vote of investiture is rare in comparative perspective. A model of investiture that requires a majority of parliament to approve of a nominee, as in Ireland, is more common. This Swedish paragraph must be seen in the light of the frequent minority parliamentarism.⁵⁹ The Swedish model enhances the chances of 'compromise candidates' becoming prime ministers.

⁵⁸ Chapter 6:3 states that if the prime ministerial nominee put forward by the Speaker is rejected by parliament four times a new general election is to be held (within three months). Nothing prevents the Speaker from putting forward the same candidate several times, with, e.g., a more thorough program.

⁵⁹ The arguments of the constitutional committee accounted for in Sterzel 1983, pp. 86-87, provide insights in the debate and its logic. The Social Democrats claimed the investiture was included so as not to politicise the office of Speaker, i.e. that his/her nominee has to pass a parliamentary test before being able to lead the nation (*ibid.*). Yet there has been mention of a possible politicisation, for instance, at the election of the Speaker in 1979.

To exemplify one can think of the appointment of Mr Ullsten of the People's Party to prime minister in 1978.⁶⁰ The previous cabinet of Mr Fälldin had to resign (because of a notorious dissension on nuclear energy), and in the aftermath Mr Ullsten was able to form a cabinet with the outright support of only his own party. The parliamentary support measured as seats in the Riksdag was 39 out of 349 (thus, 175 would have been needed to bring down the nominee). This solution became possible only because both the Social Democrats and the Centre Party abstained from voting altogether. Accordingly the parties and groupings that disapproved of Mr Ullsten (particularly the Communists and the Moderate Unity Party) were not able to mobilise the required majority of votes *against* him and he was subsequently appointed prime minister. Therefore, to abstain from voting is an implicit approval of the prime ministerial nominee as it actively decreases the possibility of a disapproval, i.e. the possibility of obtaining a negative majority. This negative parliamentarism is peculiar bearing in mind it does not require one single vote in favour of the candidate for the most prominent political position in the nation. On at least three occasions has the premier been 'approved of' with more votes against him than for him (1978, 1979 and 1981). Generally this instrument is a disadvantage for the cabinet as it can, and tends to, produce weak governments, the essence being that it does not require the cabinet to have a fixed workable majority in parliament. Therefore it is possible that the Swedish cabinet approaches different parties on different issues to secure the passing of its bills. This instrument of investiture can put small parties (compare populist the New Democracy-party parenthesis, elected to the Riksdag in 1991 with 25 seats) in the position of kingmaker almost as clearly as an investiture through positive parliamentarism. At present a realistic scenario is that the Social Democrats win an election without an overall majority (average post-war ratio of votes has been 45,5 per cent⁶¹). In the following vote of investiture the opposition of right and centre parties vote against the prime minister (however, a total of less than 50 per cent of the votes), a scenario in which small parties might be able to decide whether to accept a prime ministerial nominee by i) voting for or abstaining, or ii) by rejecting the nominee by joining the opposition and voting against the nominee. A *poujadist* party without ministerial aspirations might be tempted to actively reject a nominee, with a shortsighted political pay-off in mind.⁶²

⁶⁰ For a thorough discussion of the events, see *ibid.*, pp. 84-90.

⁶¹ Holm 1992, p. 38.

⁶² See also Stertz 1983, p. 177.

This possibility offered to 'compromise alternatives' is highlighted because there are no other procedures of investiture. The power of appointing other members of the cabinet lies, both formally⁶³ and in practice,⁶⁴ with the prime minister. According to the Swedish convention, the nominee also specifies the party composition at the time of his/her nomination, but at the time of the prime ministerial vote of investiture there need not be a complete list of ministers.⁶⁵ Based on the present constitution, the spectrum of choice of other members of cabinet is comparatively vast, the only constitutional criterion is that the persons in question must have been Swedish citizens for ten years.⁶⁶ Thus, these provisions focus on the prime minister and his/her accountability.⁶⁷

Should the prime ministerial nominee put forward by the Speaker be rejected by the parliament, the Speaker has to make a second nomination (with no formal restrictions, nothing prevents the Speaker from advocating the same nominee, with, for example, a more thorough program).⁶⁸ This procedure may be repeated until the choice of the Speaker is rejected a fourth time, which triggers a general election (to be held within three months). This rule has so far not been put into practice. Concerning the appointment of the Swedish prime minister, one can conclude that the rules are of primary importance, and there is indeed a *pouvoir neutre* involved, but it is not, as an exception to the rule, the head of state.

In the *Danish* constitution the paragraphs relevant for the office of prime minister are found mainly in part three of the Constitutional Document (articles 12-27). A distinctive difference in comparison to Sweden is that the constitution does not separate executive power from the institution of head of state. The executive power is distinctively vested in the Crown in the

⁶³ Instrument of Government, chapter 6:1.

⁶⁴ Ruin 1991, p. 62.

⁶⁵ Holmberg & Stjernquist 1976, p. 107. See also von Sydow 1990, p. 84.

⁶⁶ Chapter 6:9. The article also states that ministers may not practice any other occupation when in office.

⁶⁷ Holmberg & Stjernquist 1976, p. 105.

⁶⁸ Instrument of Government, chapter 6:3.

Danish Constitution (article 3 states: "*The legislative power shall be vested in the King and the Folketing conjointly. The executive power shall be vested in the King.*"/compare chapter 1:1, 1:4 and 1:6 of the Swedish constitution which exclude the monarchy from any contact with daily politics). Concurrently, the Crown appoints the prime minister and other ministers.⁶⁹ In addition, the same article states that the monarch decides on the number of ministers and on the distribution of duties of government among them. The monarch does not have to account for his/her actions; the monarchy is sacrosanct.⁷⁰ A comparison with Sweden highlights another major difference. The Swedish Instrument of Government has eliminated the possibilities of head of state-intervention and transferred the central role to the Speaker of the parliament. This superficially unimportant transfer of power might prove significant for the prime minister, as the threat of politicising the office of Speaker is closer at hand than in the case of the Crown. The sovereign is formally above politics and is likely to be 'trained' for the task of government formation, whereas the Speaker is a senior politician. On several occasions in the 1970s the Swedish Speaker was criticised for his preferences.⁷¹ The Swedish constitution gives neither guidelines for how the Speaker should be elected (i.e. there is room for party tactics), nor for how he/she is to select a prime ministerial nominee.⁷²

The monarch appoints, or acts as, an *informateur*⁷³ (a part of the so-called "*Amalienborg runde*", talks with the party leaders) in Denmark as opposed to the Swedish model where these duties are effectively separated from the Crown and vested in the Speaker. In Denmark post-election scenarios without an obvious *formateur* of the cabinet are common, which emphasises the role of the *informateur* - in Denmark the monarch.⁷⁴ The role of the Danish Crown can and has been more than that of an *informateur*, as opposed to the Swedish case where the Speaker

⁶⁹ Article 14 of the Danish constitution.

⁷⁰ Article 13 of the Danish constitution.

⁷¹ See, e.g., Bogdanor 1984, p. 67-69.

⁷² Compare chapter 4:2 of the Swedish Instrument of Government.

⁷³ This *informateur* has been the foremost opposition leader or the prime minister still in office, with probably the only exception being the highlighted role of the Danish speaker in 1975.

⁷⁴ Fitzmaurice 1981, pp. 45-49.

is nothing but an *informateur* and is seen to have few options at hand.⁷⁵ In comparison with the Danish Crown, or the pre-1974 role of the Swedish Monarch, the role of the Speaker is complex. The role of the Speaker *per se* is formal and less important as he/she is unable nominate the prime minister without parliament (the vote of investiture), yet the task cannot be delegated to another *informateur*.⁷⁶

The unspecified Danish constitution has generated a diversity of practices: the monarch has, according to the specific situation, either appointed or acted as an *informateur* and/or appointed a *formateur*.⁷⁷ As with the Swedish Speaker, one has to conclude that the Danish Crown has been able, or strictly speaking has been forced by circumstances, to use discretion. The earlier theoretical scenario about the involvement of the British Crown is real in Scandinavia. The nominator has to face an easily politicised choice between nominating a head of a majority or minority government. However, the role of this discretion should not be overtly emphasised.⁷⁸ In the formation of the cabinet the Danish Crown and the Swedish Speaker perform similar roles, but the scope of action is wider for the Danish monarch. In comparison to the Swedish Instrument of Government, the Danish constitution is much less detailed and includes no provisions on a formal vote of investiture.⁷⁹ The Crown, thus, has possibilities to use its discretion in the appointment of prime ministers (see also below/article 14 of the constitution). The position formally resembles that of the British Crown, which nevertheless - because of the majoritarian two-party structure - has to make only a formal appointment, contrary to the Danish Crown.

Apart from explicitly appointing the cabinet, there are two other theoretical possibilities available for the monarch to manipulate the cabinet formation process: i) to decide the number of ministers and ii) to decide the distribution of duties among them. These features of the constitution are

⁷⁵ Compare *ibid.*, p. 43-45 (see also Sterzel 1983, p. 100).

⁷⁶ *Ibid.*

⁷⁷ For a thorough account, see Bogdanor 1984, pp. 57-60.

⁷⁸ *Ibid.*

⁷⁹ See also Damgaard 1990, pp. 19 and 43.

generally an advantage for the Danish prime minister. It makes for a better tailoring of a cabinet in accordance with the premier's wishes. To be able to form a cabinet without a fixed maximum of ministers is useful in systems with frequent minority parliamentarism, as in Denmark where different coalitions create different needs for ministerial posts. One can make a comparison with the Irish Republic, where the *formateur* has to deal with coalition arithmetics and a constitutionally fixed maximum of 15 ministers. To decide on the distribution of duties has a trivial ring to it but it makes it possible for the prime minister to alter the balance of power in different cabinets. One minister may lead several departments and/or the competence of a department might be divided between several ministers.⁸⁰

Summa summarum: when Sweden and Denmark are compared, the nominal constitutional differences between the appointment procedures are significant. In Sweden there is no intervention by the head of state at all, the role has been 'parliamentarised' and supplanted by the Speaker. In Denmark the role of the head of state is codified and still, like the Swedish Speaker, has the *potential* of being politically significant. Nevertheless, the *de facto* ordinary functions of the constitution are the same. The ends are achieved in different ways *de jure*. In both systems concern has been paid to ensuring that minority cabinets will be able to pass the parliamentary sieve, in Sweden through an unusual negative vote of investiture and in Denmark by abolishing that phase of the formation process.

⁸⁰ See Sørensen 1973, p. 126. Cp. article 7:1 of the Swedish Instrument of Government.

3.3.2 The Procedures of Parliament Dissolution

From the point of view of the prime minister the power to dissolve the parliament is the direct counterpart to ministerial accountability. Originally, this power of dissolution was little more than an instrument that enabled monarchs to rid themselves of troublesome popular assemblies.⁸¹ In its classic form it is a prerogative of the head of state, who can ask for the verdict of the people in a conflict between the executive and the legislative powers. The duty of a *pouvoir neutre* is to dissolve the parliament, especially when asked to, if the cabinet explicitly loses its majority through a vote of no confidence (or censure) or there is a clear dissension between the two existing chambers of parliament. In a majority of political systems this instrument performs its original role only under exceptional circumstances (such as when associated with constitutional changes). Normally the device is the most effective means of trying to strengthen the relationship between the cabinet and the electorate. If a head of state formally dissolves the legislature, which often is the rule, the usage of this prerogative is reactive on behalf of the head of state, not active. Even though the usage of the prerogative is reactive one imminent question remains: may the head of state *refuse* a request for a dissolution?

3.3.2.1 The Cases of Britain and Ireland

In Britain the instrument of dissolution is the most important political instrument put in the hands of the prime minister. A set of rules have evolved which substantially limit the discretion of the Crown. The extent to which this instrument can be used as a 'political weapon' by the prime minister is a function of two factors:

- 1) whether the ability to call an election is vested in the cabinet or in the premier, and
- 2) the minimum number of days that, by law, elapse from the dissolution of parliament to the day of the new election ('the surprise element').

⁸¹ See Markesinis 1991, pp. 178-179.

A dissolution rapidly followed by an election is an effective method of minimising the opportunities of the opposition and of asserting prime-ministerial authority, especially in a one-party cabinet (provided the timing is right). The British prime minister can call an election with a notice of only 17 weekdays. Furthermore, the British tradition vests the power of calling an election in the prime minister. This practice has been established since 1914 and the present omnipotence of the prime minister probably came about through a misunderstanding of the precedents.⁸² The fewer who know the date of election, the smaller the risk of a fatal information leak. Thus, the prime minister is *solus* in his/her decision-making. British cabinet papers suggest that at times only trusted political friends, not necessarily cabinet members, have been consulted before the decision to dissolve parliament is reached.⁸³

The question of whether it is possible for the Crown to refuse a requested dissolution was brought to the fore after the general election in February 1974, when Wilson's cabinet faced the threat of immediate defeat in parliament at the Queen's Speech. Finally, the discretion of the Queen did not have to be tried at that occasion, which leaves a denial of a dissolution as an entirely theoretical possibility of royal discretion in modern British politics. A dissolution has not been refused by the Crown since the Reform Act of 1832.⁸⁴ However, Turpin argues that, according to some constitutional authorities, it is proper for the monarch to refuse a dissolution were it the case that a general election "... *is contrary to the public interest in the circumstances prevailing at the time, on condition that an alternative government could be formed that would be able to carry on with a working majority in the House.* "[compare rule 2 of appointment earlier].

In the Irish Republic dissolution of parliament is the prerogative of the head of state. However, several differences can be discerned in comparison with Britain. According to article 13:2.1 of the Irish constitution, it seems no discretion is left for the head of state since the parliament "*shall be summoned and dissolved by the President on the advice of the Taoiseach.*"

⁸² Mackintosh 1978, p. 74. See also Rose 1991, p. 33 and Marshall 1984, pp. 48-54.

⁸³ Markesinis 1991, p. 179. See also idem 1972 and Lord Blake 1975, p. 58.

⁸⁴ Further details in Marshall 1984 and Rawlinson 1977.

Nevertheless, the next paragraph, 13:2.2, explicitly provides, as an exception to the rule, the Irish President with the discretionary powers of a *pouvoir neutre*. The article is formulated as follows:

"The President may in his absolute discretion refuse to dissolve Dáil Éireann on the advice of a Taoiseach who has ceased to retain the support of a majority in Dáil Éireann." (own underlining)

This paragraph, which allows the president to refuse a reference to the people, must be seen in the light of the earlier Irish constitutions. The constitution of 1922 did not vest the power of dissolution in the President of the Executive Council. Its article 53 denied a defeated president the right to a dissolution, as a protest against the British model with a 'too-powerful prime minister'.⁸⁵ In the new constitution of 1937 Mr de Valera (probably) compromised between his own wish to strengthen the office and the provisions of the 1922 constitution. In case the prime minister is more devoted to retaining office than he/she is to the public interest, this safeguard, lacking in Britain, is built in. Analyzing Britain, Marshall dealt with "*the possibility in an era of multi-party governmental groupings, that requests for dissolution might be disputed or resisted within the governmental party or that the coalition leader might be held to be requesting dissolution to preserve his own position or for narrow political reasons.*".⁸⁶ Turpin concluded that, at present, the safeguard depends on the political judgment of the Sovereign, and the question arises whether it is best left there, or whether a new mechanism should be devised to take the place of the prerogative.⁸⁷

The precise meaning of the Irish wording "*ceased to retain the support of a majority*" has, as of the time of writing, not been defined in practice. Does this wording imply only a prime ministerial defeat on a (single but important) policy matter or should it refer to a clear vote of no confidence⁸⁸? This query is to be decided by the president, and since the paragraph is

⁸⁵ Ward 1990, p. 373.

⁸⁶ Marshall 1984, p. 42.

⁸⁷ Turpin 1990, p. 157.

⁸⁸ See also Ward 1990, p. 373.

without precedent one can determine two things: the paragraph is not of a great importance, but, with no precedent at hand, the paragraph could be interpreted in a broad sense and thus refer to no more than a defeat on a policy issue.⁸⁹ Such an interpretation could be likely in a situation of *cohabitation*. President Mrs Mary Robinson, who in her contest for the presidency was supported by the Labour Party and the Workers' Party, for a long time governed with a Taoiseach from the republican Fianna Fáil (cp. the Swedish problems with a potentially politicised office of Speaker).⁹⁰ Nevertheless the Taoiseach, under all normal circumstances, denotes the day of election - just as his colleague in Britain. The practical consideration that new elections can be arranged quickly in Ireland is more important - and this fact can be politically utilised by the premier. A general election must take place *within* 30 days after a dissolution of the Dáil.⁹¹ The article 13:2.2 has been of significance on at least two occasions, in 1938 and, 1944 and (implicitly) 1989 (1994).⁹² On none of these occasions has the president overruled the will of the prime minister, i.e. not granted a dissolution. O'Leary accordingly states that no Irish president has acted as a major constraint on a Taoiseach or his government.⁹³

Summa summarum, the most effective means of exerting prime ministerial authority is constitutionally restricted in Ireland as a result of article 13:2. The potential for 'political extortion' of parliament decreases, even in the present situation with no precedents of the president's actual discretion in one direction or the other. The constitutions and conventions of the two systems provide two different approaches to parliamentary dissolutions, neither of which has been more than implicitly restrictive for the cabinet and the prime minister.

⁸⁹ The Report of the Committee on the Constitution in 1967 recommended that this article should be clarified by prescribing that the loss of support by the Taoiseach must be indicated by a vote of the Dail. See also O'Reilly 1980, p. 173.

⁹⁰ See also Chubb 1966, pp. 23-24.

⁹¹ Article 16:3.2 of the constitution prescribes this maximum. The date of election is formally fixed by the Minister for the Environment within these limits.

⁹² The situation of 1989 was nevertheless different, Ward mentions that the article has been invoked twice, *idem* 1990, p. 373.

⁹³ O'Leary 1991, p. 143.

3.3.2.2 The Cases of Sweden and Denmark

Sweden shows a different constitutional way of tackling dissolutions of parliament. The formal provisions are found in article 3:4 of the Instrument of Government.⁹⁴ The potential for politicising the dissolution instrument is repressed in Sweden. Dissolution cannot be used as a political weapon in a way typical of Westminster-systems. There are at least three reasons for less politicised dissolutions in Sweden. First, the dissolution of parliament is vested in the cabinet, not in the office of prime minister.⁹⁵ A decision to dissolve parliament is taken as a normal cabinet decision, and it is uncertain whether the prime minister would be able to dissolve the *Riksdag* without the consent of the whole cabinet. Cabinet decisions in Sweden heavily rely on the principle of consensus.

Second, one distinctive feature of the Swedish Instrument of Government is that ordinary, fixed elections are always held every four years, in spite of any 'in-between' dissolutions of parliament.⁹⁶ Until the general elections in the autumn of 1994 this fixed period was only three years long.⁹⁷ Hence, a parliament elected through a dissolution has a mandate only for the remaining part of the fixed four-year period, i.e. no new four-year period starts off when a new parliament, elected after a premature dissolution, is installed. From this perspective the earlier mandate of only three years⁹⁸ was exceptionally short. A premature dissolution at the beginning of the fixed mandate is restricted by the provisions in chapter 3:4, which state the cabinet cannot dissolve parliament before three months has passed since the first meeting of a new parliament

⁹⁴ Exceptional cases to be noted: the cabinet is not allowed to dissolve parliament within three months of the first sitting of a new parliament (chapter 3:4). In case of no-confidence within this period the cabinet must resign.

⁹⁵ Chapter 3:4 of the Instrument of Government. Were it the case that the prime minister is authorised to make the decision, it would give a too powerful position to his/her party in a system which favours coalitions as a parliamentary constitutional committee argued in 1968, see Sterzel 1983, p. 137.

⁹⁶ Chapter 3:3 of the Instrument of Government.

⁹⁷ See *Regeringens proposition 1993/94:115*, pp. 6-9.

⁹⁸ For a comparative perspective, see, e.g., the chapter introduction in *Parliaments of the World* 1986, p. 19.

(compare Britain in early 1974). At the end of the fixed mandate the cabinet is equally unlikely to dissolve parliament because of the time-consuming process of arranging elections.⁹⁹

Another reason for the prime minister not being able to use this instrument to its full extent is that the Swedes do not have a tradition of dissolving parliament, and the time to prepare for an election is estimated to be seven to eight weeks (a dissolution must take place within three months of the dissolution proclamation - chapter 3:4).¹⁰⁰ The long time between a dissolution and a general election is an additional deterrent (in spite of the fact that this would give the cabinet the opportunity to cling to power for a period of several months).¹⁰¹ Another reason for not adhering to parliamentary dissolutions has been the custom of arranging parliamentary and municipal elections simultaneously. A dissolution according to chapter 3:4 has never taken place, although there have been deliberations on a number of occasions.¹⁰² The Swedish Riksdag has experienced only one premature dissolution after World War II, caused by the 1958 row over pensions.¹⁰³ The otherwise important office of Speaker does not play any role in a dissolution of parliament.

In Sweden the possibility of a premature dissolution has been discussed in only two separate contexts, both of which constitute reactive rather than active political moves. The first instance concerns a total stalemate in the process of cabinet formation (which automatically will lead to a dissolution after four unsuccessful prime ministerial nominations), and the second instance is to use the instrument as a reply to a vote of no confidence. Another highly theoretical possibility would be to use these two devices together as an ultimate way of forcing a general election (if, for instance, the party constellations in the Riksdag have been altered) by first passing a vote of

⁹⁹ The cabinet is not entitled to dissolve parliament when its ministers perform their duties as caretakers (i.e. after a formal resignation).

¹⁰⁰ von Sydow 1990, p. 84. See also Sterzel 1983, p. 129-130. In 1980 a constitutional committee debated both the possibility of 'floating mandates' and a shortened time between dissolution and a new general election, see *idem*.

¹⁰¹ *Ibid.*, p. 131-132.

¹⁰² See, e.g., Sterzel 1983, pp. 117-140.

¹⁰³ At the time the second chamber of the bicameral parliament was dissolved.

no confidence in the cabinet, and if the cabinet does not propose a dissolution, vote against the prime ministerial nominee four times.

The lack of a tradition of dissolution (as a consequence of the earlier three-year mandate of the parliament) has been a notable disadvantage for the Swedish premier. The prolonging of the mandate to four years from January 1, 1995 will probably contribute to making dissolution a more realistic feature. The argument in the bill proposal stated that earlier it was realistic to hold an election only during the (partially restricted) first and, possibly, the second year of the three-year term.¹⁰⁴ It can also be argued it would be easier for the prime minister to 'abuse' power vested in the Crown, were this power still in the hands of the monarch (rather than in the hands of the Speaker). Before the present constitution was enacted the Swedish Crown was so distanced from its prerogatives that the prime minister's power *de facto* was interpreted as greater before the enactment of the new Instrument of Government (contrary to the respective constitutional texts). This paradox points to the need for measuring the distance between constitutional theory and practice.

In Denmark, in case of a vote of no confidence, the prime minister has the opportunity to settle differences with the legislature by calling a general election. As the (formal) executive power is vested solely in the Crown, the monarch may issue writs for a new election "*at any time... on the advice of the prime minister*".¹⁰⁵ The constitutional usage of "may" instead of "shall" makes it theoretically possible for the Danish Crown to deny a dissolution, but this possibility remains theoretical, as in Britain.¹⁰⁶ More important, the expression "*at any time*" in article 32:2 gives, according to Sørensen,¹⁰⁷ the cabinet a free hand not only over the timing of an election, but also over the reason for dissolution. *Folketinget* may and has been dissolved on the premises of

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¹⁰⁴ Regeringens proposition 1993/94:115, p. 8. [government proposal]

¹⁰⁵ Article 32:2 of the Danish constitution.

¹⁰⁶ E.g. Fitzmaurice (leaning on other sources) has stated that the only possible area of royal discretion lies in the appointment of a new government after an election or a political crisis.

¹⁰⁷ Sørensen 1973, pp. 93-94.

party-political reasoning, the last example of which was in August-September 1994.¹⁰⁸ When comparing the constitutional attributes of the Danish and the Swedish prime minister, dissolution of parliament is a tangible difference. The Danish constitution - through the Crown - puts the power of dissolution in the hands of the prime minister, not the cabinet *en bloc*,¹⁰⁹ which can contribute to a premiership beyond a *primus inter pares*. The mandate of the Danish parliament is four years and if a parliament is dissolved and a new one elected, a new mandate of four years sets off, i.e. unlike in Sweden. There seems to be no provision on how soon a premature election is to be held,¹¹⁰ but by going through the Yearbooks of the Danish Parliament (*Folketingets Årsbog*), one can draw the conclusion that premature elections are held quickly, on the average within less than 30 days after the dissolution (premature elections have occurred 24-36 days after the dissolution, with the variance being caused by the legislative work¹¹¹). This time is only half of that estimated to be necessary for a premature election in Sweden. The time required should be viewed from a comparative perspective. As shown earlier, elections can be facilitated as quickly in Britain as in Denmark. In Ireland elections have to be held within 30 days from the dissolution (in Sweden within 3 months).

In comparison with Sweden, the Danish royal prerogative of dissolution still remains, however in a reactive and ceremonial form. Article 32:2 of the Danish constitution puts the initiative in hands of the prime minister, not the cabinet, by stating that:

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"The Prime Minister shall cause a general election to be held before the expiration of the period for which the Folketing has been elected."

¹⁰⁸ Article 32:2.2 states writs for an election shall not be issued after the appointment of a new cabinet until the prime minister has presented himself to the parliament.

¹⁰⁹ Cp. Article 32:3 of the constitution.

¹¹⁰ No information on this matter is provided by the constitution. Nor do authorities like Sørensen provide any detailed information (in idem 1973; a call to the parliament confirmed this view). Yet the parliament has been dissolved for political reasons (dissolved six times 1945-1984, see von Beyme 1985, p. 383).

¹¹¹ See Folketingets præsidium [Folketingårbog], e.g., 1978, 1983 and 1984.

This paragraph is close to an opposite of the earlier Swedish three-year term of the parliament. Furthermore, constitutional committees in Sweden have argued that precisely the Danish solution, putting the ultimate decision on dissolution in the hands of the prime minister, gives the prime minister's party a too powerful position, especially in coalition governments (see 3.3.1.2).

3.3.3 Termination: Dismissal and Resignation of Ministers

This subsection touches upon several indispensable questions of the thesis. First, it is necessary to make a theoretical distinction between a resignation and a dismissal. Cabinet termination is dealt with later in chapter five (cabinet recompositions, i.e. reshuffles). A resignation may concern an individual minister or the whole cabinet and is usually caused by explicit external pressure, most likely a vote of no confidence. A dismissal nearly never concerns the cabinet as a whole, but rather one or several ministers and may be caused by external pressure. However this pressure is often of an implicit character. The minister himself/herself is the active agent in a resignation, whether voluntary or involuntary, whereas the active agent is someone else with a dismissal. A dismissal is primarily initiated by the head of government or the head of state (or any of the two acting on behalf of an explicit party interest). The latter alternative should be possible only in presidential systems, where ministers are politically responsible to the head of state and not the parliament (i.e. a full separation of powers). The concepts of resignation and dismissal are understandably entwined, since the reasons for both range from entirely personal to political, and as the former option is usually agreed on before the head of government has to force a minister out of office. A dismissal hence often has a background of political manoeuvring, whereas personal factors seldom lead to an outright dismissal.

The ultimate outcome of a resignation and a dismissal may be the same: the formation of a new cabinet. This section will deal with two aspects that usually are based in the constitution: the provisions on when a cabinet should resign and how the instrument of dismissal can be employed. Ministerial accountability to parliament is dealt with later, in chapter six on the relations between the executive and the legislative branch.

3.3.3.1 The Dismissal of Cabinet Ministers

3.3.3.1.1 The Cases of Britain and Ireland

In Britain the prime minister constitutionally, i.e. by convention, enjoys the total freedom of appointment and dismissal of ministers.¹¹² Accordingly the prime minister has been able to use this instrument. The examples are numerous, Macmillan's simultaneous dismissal of seven cabinet ministers caused a stir, as did Thatcher's dismissal of twelve ministers in 1989 (not all of which were of cabinet rank). In the words of Gladstone, 'a prime minister must be a good butcher'. However, when one adds the perspectives of party politics and government efficiency, one beholds that the British prime minister cannot dismiss cabinet ministers at will. In the words of James:

*"Dismissal is a two-edged weapon. The Prime Minister can usually survive the acrimonious departure of a senior minister colleague, or even several, but the government suffers... The governing party is made to look weak and unhappy. The Prime Minister, who instigated the trouble by the dismissal, attracts the odium of dividing his followers. This can weaken rather than strengthen him."*¹¹³

Constitutionally both parts of this complex instrument lie solely in the hands of the premier. This is one of the reasons for the instrument to evolve into the custom of cabinet reshuffles in Britain. Any dismissal is likely to entail a ministerial reshuffle ("... always a complex, far-reaching and disruptive exercise, especially if the Prime Minister is trying to balance competing factions in the cabinet."¹¹⁴). As for Britain, the restraints on the deployment of the instrument lie on other than the constitutional dimension.

¹¹² James 1992, p. 102.

¹¹³ Ibid., p. 102.

¹¹⁴ Ibid.

In Ireland this instrument formally is divided into several parts. Ministers are appointed by the president after the approval of the Dáil, whereas the prime minister has the full right to dismiss the cabinet colleagues "... *for reasons which to him seem sufficient*"¹¹⁵ - without having to pay attention to a dissenting view of the Dáil or the president.¹¹⁶ Hence, the internal relations of the cabinet are staked out by providing the Irish prime minister with the same unquestionable means as his British colleague. In case of dissension within the cabinet, the prime minister has two possibilities to alter the constellation: to dismiss the rebels (often entailing a reshuffle of the cabinet), or, ultimately, to resign, which forces the cabinet to resign *en masse*.

3.3.3.1.2 The Cases of Sweden and Denmark

In Sweden the appointment and dismissal of ministers is vested in the prime minister.¹¹⁷ The architects of the Swedish Instrument of Government did not try to define and justify the need for a dismissal, as in many other constitutional texts, e.g. the Irish Constitution. When a Swedish prime minister has resigned, the cabinet resigns *en masse*.¹¹⁸ The legal imbroglio that arose in Ireland in the wake of the 1989 crisis are handled through constitutional means in Sweden. A caretaker prime minister and his cabinet are not allowed to initiate a premature dissolution of parliament.¹¹⁹

In many other respects Swedish parliamentarism is extensively codified. There are several confidence-measuring instruments in the Swedish constitution that affect the office of prime minister. Parliamentarism is mainly carried out through the provisions of chapter 12 of the constitution. Chapter 12:4 stipulates that the members of cabinet will be dismissed by the Speaker if a majority of the members of parliament declare the minister in question no longer

¹¹⁵ Article 28:9.4 of the Constitution.

¹¹⁶ Article 13:1.3 of the Constitution.

¹¹⁷ Chapter 6:6 of the Instrument of Government.

¹¹⁸ Chapter 6:7.

¹¹⁹ Chapter 3:4.

enjoys their confidence (theoretically this could imply a rapid dismissal of even the premier).¹²⁰ The impact of this specific instrument has, nevertheless, been more indirect. A Minister of Justice, Mrs Leijon, is said to have resigned in 1988 because of [the existence of] this instrument.¹²¹ No minister has yet had to resign as a direct consequence of this paragraph. The instrument has been tried against the prime minister in 1980 (Fälldin), but only as a manifestation of general disappointment with the politics of the cabinet. Through these provisions one of the features of rigid constitutions can be understood: the more there are constitutional instruments, the more there are possibilities of thwarting a cabinet. An instrument intended to measure the confidence of a specific minister can almost always be used as a general instrument for expressing dissension with the cabinet's politics.

Adhering to the letter of the Danish constitution, the Crown does not have to rely on anyone for a reshuffle of the cabinet. The monarch appoints and dismisses ministers. However, the role of the monarch has been entirely reactive and ceremonial. A royal denial of a prime ministerial request for dismissal would be an intriguing, however implausible event. This situation is more unlikely than a termination of the whole cabinet without the request of the prime minister (which has occurred in the 1920s). To be able to terminate a cabinet, or dismiss a prime minister, the Crown [read: the prime minister] has to have a new prime minister ready to sign the decision in accordance with the Danish tradition of countersignment.¹²² Accordingly, the situation is no different from that in the other concerned systems.

The Danish constitution has no equivalent to article 6:7 of the Swedish constitution, that the cabinet has to resign if the prime minister resigns or dies. This element combined with the provisions of the Danish article 14 (the monarch appoints and dismisses the prime minister)

¹²⁰ To put forward such a declaration of distrust it must be signed by at least one tenth of the members of parliament (chapter 12:4).

¹²¹ von Sydow 1990, p. 84.

¹²² See Sørensen 1973, p. 128.

makes it theoretically possible for a new prime minister to inherit a cabinet; under normal circumstances, however, it is not the case.¹²³

3.3.3.2 Resignation: A Four-System Comparison

The issue of resignation is far more complex than appears at first sight. The regulations in the central constitutional texts are sparse. In all four systems there is a tacit constitutional consensus that the government has to resign if a vote of no confidence is passed on the prime minister.¹²⁴ But if a vote of no confidence is passed on a minister other than the prime minister, the premier has to confront the question of whether the responsibility should be taken collectively, or to let only that particular minister resign. The subject tends to be problematic especially when a vote of no confidence is passed on budgetary matters or the minister of finance.¹²⁵ The Danish constitution outspokenly emphasises the role of parliament, as article 15:1 states "*a Minister shall not remain in office after the Folketing has passed a vote of no confidence in him.*". The core question is how critical is the role of the premier in handling crises that collectively affect the cabinet.

¹²³ A scandal brought down the long-time prime minister Poul Schlüter in January 1993. His resignation led to a change in government from a centre-right to a centre-left coalition.

¹²⁴ The Swedish and Danish constitutions both declare explicitly that the cabinet has to resign if the prime minister does not enjoy the confidence of parliament, chapter 6:5-7 of the Swedish Instrument of Government and article 15:1-2 of the Danish constitution. An interesting feature outside the direct scope of this analysis is the German provisions that facilitate a 'constructive vote of no confidence' in the prime minister, hence significantly improving the position of the *Bundeskanzler*.

¹²⁵ The Irish constitution highlight the offices of prime minister, deputy prime minister and the minister of finance by stating that these three ministers by law have to be members of the Dail (article 28:7.1).

The role of the Irish prime minister is elevated beyond the role of a *primus inter pares* in several ways, especially in comparison to the two Nordic systems. First, article 28:9.1 states the Taoiseach may resign *at any time* (bringing down the cabinet); second any other member of the government may resign from office - by placing his resignation in the hands of the Taoiseach, and, third, article 28:9.3 declares the president shall accept the resignation of a member of the government, other than the Taoiseach, *if so advised by the Taoiseach*. In other words the constitution explicitly acknowledges the possibility of a cabinet minister not being allowed by the premier to leave the cabinet. This provision stretches the domain of the Taoiseach's influence within the cabinet. The same question could possibly emanate in a constitutional dilemma in Sweden and Denmark, where the ministers effectively are appointed and dismissed by the prime minister without further constitutional clarifications: Does this also imply that a minister could be forced to stay in cabinet? The UK, Sweden and Denmark do not have as strong a tradition of collective accountability, which makes this dilemma seem unlikely in these other three systems. Only in Ireland does the government adhere to collective responsibility (as set out in article 28:4.2). In the UK, Sweden and Denmark the responsibility can be of either individual or collective character.

With cabinet resignations *en masse*, tolerance parliamentarism is the rule. A cabinet can stay in office until a motion of no confidence, or censure, has been passed against it. Tolerance parliamentarism prevails in the tone of all four constitutions, one can discern differences only by introducing the dimensions of time and variety of parliamentary instruments. In Britain the cabinet could cling to power for almost a year without the explicit support of the parliament (budgetary consent), however, by convention it is obliged to resign if it fails to get a majority for any major issue in the Commons. A vote of no confidence has more immediate effects in Ireland, Sweden and Denmark. In Sweden there are a variety of means for parliament to express a vote or motion of no confidence, notably in chapter 12:4 (mentioned in a preceding subsection). The more institutionalised are the methods of confidence measurement, the more certain it is that confidence will be tested, and, that the time the incumbent government can cling to power will be minimised. Nevertheless the cabinet (and theoretically parliament) in almost any system could declare a certain matter to be of decisive importance, as in Britain (the Irish and Swedish constitutions generally state the government shall be responsible to parliament [article 28:4.1 and chapter 1:6]).

3.3.4 Other Constitutional Capacities

As stated in the introductory quotation the constitution embodies the whole system of fundamental political institutions, which suggests that there are several constitutional sectors which could play a part in designing the institutional framework of the premiership. Amongst such sectors is the enactment of legislation, systemic differences in which could prove to be of importance for the premiership.

In Britain bills are enacted by the monarch in a role which is passive and ceremonial. The last time the Crown refused to enact a bill was in 1707. More room for discretion is given by article 26 of the Irish constitution which gives the president the right to refer any bill other than money bills, passed or deemed to have been passed by the houses of parliament, to the Supreme Court if they could be perceived as repugnant to the constitution. This referral can be made after the prime minister has presented the bill to the president for countersignment (it has to include consultations with the Council of State). In Sweden bills and cabinet decisions have to be signed by the prime minister, or another member of the cabinet (chapter 6:7), but there has not been an occasion when the prime minister has used this provision in another way than prescribed (e.g. to delay the enactment of a bill passed by Parliament). The Danish monarch has to give his/her Royal Assent to bills to become law according to article 22 of the constitution. This Royal Assent has to be given within 30 after the bill was finally passed by parliament. Thus it is theoretically possible the Crown could delay the assent and hence passively refuse the enactment of the bill.

However, the distinction between the cabinet and the premiership has to be kept in mind: it is easy to sidetrack into a path that explains more the system than the premiership. One seldom mentioned institutional aspect of the prime ministership remains to be examined, and that is the comparative role of the deputy premiership. Out of the four political systems, only the Irish constitution mentions the deputy prime minister. The Irish constitution states the prime minister shall nominate a *Tanaiste*, deputy prime minister, from the members of government and this person must be a member of parliament.¹²⁶ The practical relevance of appointing a deputy

¹²⁶ Article 28:6.1-3.

prime minister has been modest, but it is, nevertheless, a means of pointing to the prominence of the premiership and abet his/her role in the cabinet, however in different ways. What the deputy premierships in the four systems have in common is a flexible and uncodified character. The deputy premiership can be more than an administratively supporting position. In the summer of 1995 the prominent cabinet member Michael Heseltine was appointed deputy premier in the Conservative British cabinet (with responsibilities that were far-reaching), apparently in order to reinstall some authority in the premiership which prime minister Major had lost in the events that led to the unexpected party leadership contest of July 1995.

In the Nordic block a 'stand-in prime minister' is appointed only when needed, which gives a greater freedom of choice and manoeuvring in the cabinet. After publicly stating his intention to step down in 1996, the Swedish premier Carlsson was criticised [in the autumn of 1995] for clearly favouring one of the Social Democratic Party's candidates, deputy premier Mona Sahlin. The role of the deputy has been insignificant in Sweden and the title was scarcely to be found in the media before the speculations about the identity of the succeeding premier took off in 1995. Hence the deputy premiership can function as a means of establishing an order of preference for political *protégés*. In Denmark there is a theoretical possibility of discretion involved, as article 14 states the monarch shall decide upon the distribution of the duties of government. A senior statesman is usually appointed caretaker premier after, for instance, the death of the incumbent, which in Denmark has occurred twice after 1945. In Sweden the prime minister appoints the deputy (from the members of the cabinet). Should a caretaker (i.e. the original job description for the deputy) not have been designated, the most senior member of cabinet will step in, according to chapter 6:8 of the Swedish Instrument of Government. *Summa summarum* the two distinguishable questions of the deputy premiership are: i) is there a deputy premier at all, and ii) if so, by whom is the deputy appointed (by the premier or the cabinet collectively)? A deputy appointed by the prime minister can perform one or several of the roles described above. In all four systems the premier appoints the deputy prime minister.

3.4 Towards Constitutional Profiles of the Premierships

This chapter has dealt with two different blocks of prime ministerial government. Two systems, Britain and Ireland, represent the respective limits of Westminster-style government. In Ireland the old *jus*-emphasising British traditions have been integrated in a modern, rigid and republican constitution. Both systems have a bicameral parliament, contrary to Sweden and Denmark, both of which have abolished the second chamber since 1945. Sweden and Denmark have a tradition of democratic and codified constitutions dating back to the first half of the 19th century. Despite common factors like the strong labour movement, the geographical proximity and the similar traditions of constitutional monarchy, the constitutions of Sweden and Denmark represent different constitutional concepts, which is reflected on the office of prime minister.

An introduction to the comparison of constitutional settings was made by differentiating flexible and rigid characteristics. Flexible constitutions generally create prerequisites for strong prime ministerial leadership, as in Britain. If a constitution is rigid and detailed, as in Sweden, there tend to be a high degree of institutionalisation of duties in other actors than the prime minister, which prevents the premier from intervening in specific policy-making. Ultimately a flexible constitution makes it possible to alter the fundamental rules of the game (*"no Parliament can bind its successor"*). Accordingly instruments like that of a referendum are not usually supported by law under a flexible constitution and are therefore scarcely employed. From the sovereignty of parliament it also follows there is no other institution deciding on the constitutionality of bills. In Ireland the Supreme Court and the president can be of importance in curbing the authority of government. These general characteristics are, however, of less importance than the roles of some particular mechanisms and instruments summarised across the systems below.

3.4.1 The Processes of Appointment and Cabinet Formation

The appointment of government is a stage of the political process that differs from the other stages in the sense that it sets up the political game rather than being an active stage in the game itself. In this respect there are several differences between the four political systems. A paradoxical difference between the British and Irish cabinet formation process is that the British Crown, contrary to the Irish president, theoretically could utilise a certain discretion, which has been made redundant by the two-party system.

When Sweden and Denmark are added to the comparative picture, the importance of parliamentary investiture becomes evident. Sweden and Denmark to a great extent use opposite constitutional means to achieve the same ends. In Sweden the role of the monarch has been eradicated in favour of the Speaker, whereas all executive power still, formally, is vested in the Danish Crown. The Swedish constitution employs a negative vote of investiture, i.e. a majority of the *Riksdag* has to vote against a prime minister-designate if he/she is not to be approved of, whereas there is no vote of investiture at all in Denmark. Both political paths ensure the same result - the prerequisites and functionality of a minority government. In Sweden and Denmark these provisions have proved to be of principal importance for the prime minister, as was shown by certain political events (like the Ullsten cabinet in Sweden). Britain and the Irish Republic represent another political tradition, that of majority government formation. Any ambiguity about cabinet formation appears at different stages in Britain and Ireland. In Britain the crucial constitutional stage is *before or at* the appointment of the prime minister-designate, as with any theoretically possible discretion by the monarch (Denmark provides empirical examples of situations that British constitutional scholars only theoretically have been able to elaborate). In Ireland the parliament (the Dail) has an explicit say, from the appointment of the Taoiseach-designate onwards.

Of the four systems, two exemplify possibilities of royal discretion. By contrasting Britain and Denmark, it is all the more obvious how the party system and the high Danish coalition elasticity has made a certain royal discretion desirable (the *Amalienborg Runde*) compared to the opposite situation in Britain. Does the cabinet formation need the helping hand of a neutral power, such as the Speaker in Sweden? There are obvious benefits of such intervention if parliamentary stalemates occur, but possibilities of politicising this 'neutral' kingmaker loom large (see further below on the role of the head of state). The counter-examples of Britain and, especially, Denmark show that the prime ministerial nominee gains a certain but elusive dignity from being appointed by a neutral power who is supposed to stand above daily politics. If any *de facto* discretion is exercised, it is likely to be exercised so as to form a cabinet that does not correspond to the most likely party-political government composition, for instance by appointing the leader of the biggest party in parliament prime minister-designate (without a parliamentary majority), where another party, in office, would possess a larger percentage of seats with a third party coalition party. After all, are there significant differences between the systems, if any? Below a table summary will be used as a heuristic device to clarify the question.

Table 1. A COMPARISON OF APPOINTMENT PROCEDURES

| | A. Prime minister appointed by: | B. Discretion possible in | | C. Can B be politicised? | D. Vote of investiture | | E. Parl. otherwise involved formally? |
|----------------|---------------------------------|---------------------------|--------|--------------------------|------------------------|------|---------------------------------------|
| | | theory | pract. | | Pos. | Neg. | |
| UNITED KINGDOM | Monarch | + | | | | | |
| REP OF IRELAND | President | | | | + | | + |
| SWEDEN | Speaker | - | - | - | | - | |
| DENMARK | Monarch | - | - | | | | |

Appointment procedures I →

Explanations:

+= yes, possibly increasing the parliamentary support of the appointee.
 -= yes, possibly decreasing the parliamentary support of the appointee.
 A blank space indicates the absence of the feature.

Point D refers to positive vs. negative formal votes of investiture.

When one looks at the constitutional appointment profiles above, one can see that the important differences in appointment lie implicitly in point D, the possible vote of investiture. There is a blank space for Britain, as the British Queen's Speech has been of no significance as a *de jure* or *de facto* investiture (in itself, however, the document is an important political declaration).

The constitutional monarchies of Britain and Denmark have no formal votes of investiture, and by different shades of tolerance parliamentarism, achieve different ends - majority governments in Britain and (often) minority ones in Denmark. The practice in Ireland and Sweden involves parliament. In Ireland a prime minister who passes the parliamentary sieve should have the approval of a majority (points D and E), whereas the Swedish variant only, however explicitly, acknowledges that the majority does not disapprove of the prime minister (through point D). Whether a vote of investiture is a cause or effect, the role of parliament is what matters, not the discretion of the head of state or any other *informateur*. Even if the prime minister is appointed separately and can decide on the composition of the cabinet, the [apparently varying] constitutional methods of appointment matter less than does a single ballot of investiture in parliament. A strict constitutional difference is that the Swedish system acknowledges and approves of minority governments through its negative investiture, which as a rule produces compromise-candidate outcomes. Theoretically one could argue that the position of a Swedish premier heading a minority government could be somewhat more stable than that of a Danish colleague, as the Swedish premier explicitly has been going through a formal procedure of not being disapproved of, whereas the Danish premier acts with the help of tacit consent only. However, in both systems minority governments are likely to have to rely on small group's *ad hoc* support in parliament (especially one-party cabinets). Only the Danish constitution mentions the allocation of portfolios (formally vested in the Crown), which, in a different party-political setting, could be a notable indirect means of political power.

Different constitutional routines can produce the same outcomes: so does the constitution matter when it comes to the stage of cabinet formation? Do the premiers enjoy a different constitutional status in different systems? To answer this question generally one can argue whether a certain constitution would produce the same or a different outcome in different system contexts. Were the Danish constitution in force in Britain or the Irish Republic, there is no reason to believe the outcome of a government formation process would differ from that of today's likely outcome

(i.e. primarily majority governments). Were the opposite the case, that the Irish constitution would be applied on Denmark, that would imply the possibilities to form a functioning cabinet decrease significantly. Here the divisor between majority and minority cabinets is significant. No constitutional provisions can contribute to altering the formation of a clear majority government, whereas the formation of a minority government effectively can be hindered by, for instance, a positive investiture required by the constitution.

3.4.2 The Dissolution of Parliament

The foremost political deterrent the cabinet can utilise is the instrument of parliament dissolution. Here one again finds tangible differences between the four systems. First, the 'calibre of this political weapon' is decided by the answers to several questions:

1. Of direct constitutional relevance:

1.1 In whom is the power of premature dissolution vested?

('the independence of decision-making')

- Is the decision reached by the prime minister or the cabinet collectively?
- Is the discretion (a possible veto) of another actor involved?

1.2 How soon is a general election due (the extent of 'the surprise element')?

- Minimum and maximum limits of time for the arrangement of elections.

2. Of indirect constitutional relevance:

2.1 How long is the mandate of parliament?

2.2 Is the mandate of parliament fixed or does it only represent a maximum period within which new elections will occur?

The dissolution instrument can be used in two principal ways by three political actors, the prime minister, the cabinet or the head of state. It can be used as a means of trying to strengthen the link between the government and the electorate, or it can be used in the classic sense - to submit a conflict between the executive and the legislature powers to the people for a verdict. The

former possibility is in Britain restricted only by the maximum five-year mandate of the parliament. The decision is vested in the prime minister, not collectively in the cabinet as in Sweden. Neither is there any political control *a posteriori*, as the president is entitled to in the Irish Republic. Britain represents a maximization of the power of dissolution, which can be seen from its dissolution profile in table 2 below. There is no hindrance to the prime minister's usage of the instrument from point A through to point E. The other three systems represent a wide variety of different forms of restrictions on the instrument's prime ministerial usage.

Table 2. A COMPARISON OF PROCEDURES FOR A DISSOLUTION OF PARLIAMENT

| | A. Dissolution initiative vested in: | | B. Other political actors formally involved? | C. B:s use of discretion possible? | | D. Other restrictions imposed on A:s usage | E. Days between B and gen. elect. | |
|-----------------|--------------------------------------|--------|--|------------------------------------|--------|--|-----------------------------------|-------|
| | Pr. Min | Cabin. | | Theory | Pract. | | Min. | Max. |
| UNITED KINGDOM | + | | Monarch | - | | | 23 | undef |
| REP. OF IRELAND | + | | Presid. | - | - | | undef | 30 |
| SWEDEN | | - | | | | - - | 49-56 | 90-93 |
| DENMARK | + | | Monarch | - | | - | 24-36 | undef |

Dissolution procedures I →

Explanations:

+= yes, possibly strengthening the position of the prime minister.
-= yes, possibly weakening the position of the prime minister.
A blank space indicates the absence of the feature.

undef = undefined in constitutional documents.

In Sweden the initiative lies collectively with the cabinet (point A), and, even though there is no room for discretion of the Speaker, there are several other direct and indirect restraints on the usage. The two restrictions referred to in point D (as two -) are the facts that i) no parliament can be dissolved within the three first months after its inauguration, and ii) the cabinet cannot dissolve parliament when ministers perform their duties as caretakers (which is common parliamentary practice). Also the indirectly relevant constitutional provisions on the length and character of the parliamentary mandate (earlier a three-year fixed mandate in Sweden) have

substantially contributed to bring about the present situation, the fact that there has been no premature dissolution of the Swedish parliament under the 1974 Instrument of Government.

Looking at table 2, the only particularly restricted prime minister *vis-à-vis* dissolution is the Swedish premier, through points A, D, E and the indirect characteristics of the parliamentary mandate (see also table 3 below). As for point E, the dividing line is between the lengthy processing of a premature election in Sweden and the much swifter equivalents in the three other systems. The discretion of a 'neutral power' plays no practical role in curbing the usage. Indeed there is the possibility of a negative presidential veto in Ireland, but this provision remains without a practical precedent. The tangible difference in the parliamentary mandate of Sweden compared with the three other systems produces a further summarization in table 3 below.

Table 3. TWO PRINCIPAL DIMENSIONS OF THE PARLIAMENT'S MANDATE

| | A. The length of the parliamentary mandate | B. Fixed or maximum mandate of parliam.? |
|-----------------|--|--|
| UNITED KINGDOM | 5 years | Maximum |
| REP. OF IRELAND | 5 years | Maximum |
| SWEDEN | 4 years * | Fixed |
| DENMARK | 4 years | Maximum |

* formerly three years (->1995)

The longer the parliamentary mandate, the more likely it is that a political situation occurs in which the instrument of dissolution will be used, even if the mandate is fixed as in Sweden. The Danish constitution puts the initiative of a dissolution in the hands of the prime minister. The arguments of the constitutional committees in Sweden (with its analogous multi-party politics) was that such a formulation would give the prime minister's party a too powerful position in a coalition. It can be concluded that no single factor, least of all the possible discretion of the head of state, explains the usage of the dissolution instrument. Important restrictive measures, such as in article 13:2.2 of the Irish constitution or chapter 3:4 of the Swedish Instrument of

Government, remain without a practical precedent. All three premiers but the Swedish have ample possibilities to dominate politics with the help of this particular instrument. The institutional means to curb the prime minister's use of the instrument have often proved unsuccessful.

3.4.3 The Role of a Pouvoir Neutre

When one aims at clarifying the constitutional position of the premier, the head of state holds a pivotal role. The *de facto* relations between the executive and the legislative powers are to a great extent determined by the axis of majority- versus minority government, whereas the relationship between the head of state and the effective executive power, the head of government, is determined by the constitution. At times the borderline between the formal and effective executive power is difficult to define.

Can the head of state intervene in politics? Head of state intervention is, as a rule, both undesired and a disadvantage for the government, as it even often is for the head of state. This statement is all the more valid when one excludes any role played by the head of state in forming a cabinet. In Denmark the main form of influence by the Crown is precisely the role of appointing or acting as an *informateur* when selecting a prime minister-designate. However, in none of the four systems does such intervention play an influential role. In this sense one can draw no border between the two Westminster-systems and the two Nordic systems. In Britain royal discretion in politics is an unlikely and highly theoretical possibility, as was concluded in 3.3.1.1. In Sweden any influence by the head of state is close to an impossibility, as practice also has shown in the Danish case. This leaves us with (the practically unimportant) articles 13:2.2 and 26-27 of the Irish constitution, which enable the president to use his/her discretion by denying a prime minister a dissolution of parliament, and makes it possible for the president to submit bills to the Supreme Court or a referendum for a review. In theory a possible discretion can be either positive or negative from the point of the prime minister. With cabinet formation both alternatives are possible, whereas the discretion can be used only negatively when it comes to parliament dissolution (article 13:2.2 of the Irish constitution). It is more adequate to discuss the influence of a political neutral arbitrator, a *pouvoir neutre*, rather than the influence of the head

of state. Although a comparatively unusual solution, the case of the highlighted office of Speaker in Sweden shows that the role of a neutral power can be vested in other institutions than just the head of state.¹²⁷

Carrying this line of thought further, a prime minister in a republic is more likely to be circumscribed in the exertion of executive power than in a monarchy, if at all. A presidential political system, almost by default, highlights a constitutional aspiration to vest certain ultimate powers in a *pater politicus* who stands above parliamentary politics (as in Ireland), whereas this aspiration is lacking in monarchies that have experienced the omnipotence of the Crown (Britain, Sweden and Denmark). Presidential systems acknowledge the need for a *pouvoir neutre*. In monarchies, probably with Sweden as the exception, there is still a notable discrepancy between the executive power *de jure* and *de facto*.

It is important to make a distinction between i) real discretion by a neutral arbitrator and ii) government action through the prerogatives of this arbitrator. The former alternative competes with prime ministerial or cabinet authority whereas the latter is likely to improve it. The distinction is difficult to make when one looks only at the letters of the constitutions. A blurring of formal and effective executive power is of advantage for the cabinet. It enables the effective executive power to act through the head of state, as in Britain and Denmark. The prime minister can usually take advantage of this constitutional no-man's land between the formal and the real executive power. The advantage becomes evident when one considers the role of the premier in the two basic pillars of executive power that constitute the basis of, for instance, the Danish constitutional model. In a constitution context like the Danish, in which the executive power rests on 1) the formal executive supremacy of the monarch and 2) prime ministerial supremacy in the cabinet, the influence of the prime minister can be maximised by using both the royal prerogatives and the constitutional instruments allocated directly to the premier. A comparison of Sweden and Denmark enhances this consideration. An essential element of the Swedish constitutional reform in the 1960-1970s was to eradicate the remains of the monarch's political power. First, because it *per se* was seen as outdated and, second, as the prime minister had ample

¹²⁷ Some interesting theoretical possibilities are elaborated in the context of presidential systems in Shugart & Carey 1992.

opportunities to exert his/her influence through these prerogatives (probably more so than today¹²⁸). The Irish and especially the Swedish constitutions have aimed at minimising the indirect influence of the government by clear-cut but different constitutional means. If one looks only at the involvement of a *pouvoir neutre* from this four-system perspective, one can conclude that the Irish prime minister is the most restricted of four generally unrestricted premiers (because of articles 13:2.2 and 26-27 - which all are concerned with extraordinary circumstances). Furthermore, according to O'Leary, no president has been a major constraint on the Taoiseach.¹²⁹ Accordingly it can be stated the influence of a *pouvoir neutre* is minuscule. Therefore, in a constitutional comparison, it is meaningful to make a distinction between discretion in theory and in practice, as reflected in tables 1 and 2. If there is any room for discretion, it appears as an influence in the process of cabinet formation or the dissolution of parliament. When a cabinet is appointed, the discretion could fortify the position of the prime ministerial appointee, as in a parliamentary deadlock in the UK, or, possibly, be used to construct a cabinet other than the one primarily preferred by the prime minister-designate in Sweden and Denmark (thus being negative for the prime minister, also the opposite is feasible in the case of Sweden and Denmark). None of the four systems allow extra-parliamentary discretion at cabinet appointment and dissolution of parliament. This scarcity of discretion is also evident on a continuum of active (like Denmark) versus reactive influence (Ireland).

Another lesson learned is that a constitutional ambiguity, or discrepancy between form and function, tends to work in favour of the effective executive power, practically speaking the prime minister. Put another way, the prime minister has been able to use the paragraphs to his/her advantage. The opposite has very seldom been the case. Experiences from Britain, Denmark and Sweden (before 1975) support this postulate. The Irish Republic can be included if one reformulates the thesis to state that the role of discretionary powers of the formal executive, especially as used against the cabinet, is minuscule.

¹²⁸ See Ruin 1990.

¹²⁹ O'Leary 1991.

Table 4. THE POSSIBILITIES OF NEUTRAL DISCRETION

The role of the head of state or the speaker

| | | A: Could the discretion be of pol. importance? B: Has the discretion been of pol. importance? | | | | | | | | |
|--|----------------------------------|--|-----------|-------|------------|-------|-----------|-------|-----------|----------------------------|
| | | U K | | I R E | | S W E | | D E N | | |
| | | A | B | A | B | A | B | A | B | |
| Areas of possible discretion by head of state /speaker | 1. Procedures of govt. formation | yes | <u>no</u> | no | <u>no</u> | yes | <u>no</u> | yes | <u>no</u> | no influence |
| | 2. A dissolution of parliament | yes | <u>no</u> | yes | <u>no</u> | no | <u>no</u> | no | <u>no</u> | no influence |
| | 3. Legality of bills etc. | no | <u>no</u> | yes | <u>yes</u> | no | <u>no</u> | no | <u>no</u> | infl. in IRE (unimportant) |

It is simple to elaborate and emphasise the theoretical possibilities of an intervention in a specific political system, but these hypotheses become further distanced from reality when, from a comparative perspective, one sees how theoretical they have remained in all four systems. Some scholars claim that it makes a difference in whom the role of *pouvoir neutre* is vested. The neutral power of an arbitrator might be politicised *bona fide* or *mala fide*, i.e. unintentionally or intentionally. According to this line of thought, represented by Bogdanor,¹³⁰ the discretion of a monarch is likely to be politicised only unintentionally, whereas a president might have personal political reasons for steering certain decisions, like the party-political composition of a coalition. The Speaker's distance from daily politics is even shorter than that of a president, hence making a politicisation of his/her acts even more likely. This distinction is worth noting and is supported by events such as in Sweden 1979. Nevertheless, the distinction is more a statement in favour of constitutional monarchy than against other forms of governance. Usually the influence of the *pouvoir neutre* reaches only the process of cabinet formation. In Ireland and Sweden the prime minister-designates cannot enjoy the intangible weight of being appointed by the head of state, which could prove important in a parliamentary stalemate (with three major parties where one party leader always is defeated by the combined strength of the other two). *Summa summarum*, the role of a *pouvoir neutre* is and probably will remain minimal, especially as an obstacle to prime ministerial leadership. To borrow the words of Rose and Kavanagh:

¹³⁰ Bogdanor 1984. See also idem 1995, pp. 61-83.

"Monarchs have remained in power where the reigning family has been willing to withdraw from a politically active role. Reciprocally, monarchies have fallen when the monarch has sought to continue to assert political power.".sup131

3.4.4 The Role of Other Constitutional Provisions

The role and importance of a diverse group of further constitutional provisions that involve the prime minister are complicated to assess as one singular aggregate. In all four systems the theoretical power of dismissing cabinet ministers at will is unrestricted. When it comes to the doctrine of parliamentary accountability, the only clear prime ministerial advantage - in real terms - is the individual accountability in Britain as opposed to the solely collective doctrine in the Irish Republic.

The important notion is that many of these provisions provide nuances of the premier's status in cabinet: for deciding whether the prime minister is a *primus inter pares* or more. The only constitution that explicitly mentions the office of deputy prime minister is the Irish, which contributes to elevate the position of the prime minister in daily politics. The provisions that the Irish president shall accept the resignation of a cabinet minister *"if so advised by the Taoiseach"* is another example of small but important determinants of the premier's status. In that way the Irish doctrine of collective responsibility, in itself a potential *impasse* for the prime minister, is turned into an explicit power over the cabinet. However, none of the four systems include explicit provisions for the premier to lead and outline national policy-making (compare article 65 of the German constitution - the *Kanzlerprinzip*).

¹³¹ Rose & Kavanagh 1976, p. 568.

As anticipated, the role of the countersignment of laws is subordinate. The prime minister countersigns bills only in Sweden (where the premier might delegate the duty to the corresponding minister). Theoretically the prime minister could delay the enactment of bills, but no evidence of such extraordinary legislative delays were found. In the Danish tradition of strong ministerial accountability, it would be very odd for the premier to countersign legislation. Referendums do not play an important role, not even in Denmark which is renowned for its use of decisive referendums. However, the difference between roles the referendum instrument plays in these four systems is notable. In Britain a referendum is unimportant, since it is neither supported by law nor by tradition. In Ireland it is of a certain importance, and a referendum has been imposed on six occasions (1995). In Sweden only consultative referendums can be held, as opposed to the Denmark, the theoretical difference being that the Swedish cabinet could carry on in office when the people vote against a proposal supported by the parliament and the cabinet. The impeachment procedures offer another possibility to discern the precise status of the prime ministership, as the prime minister can be the ultimate instance that decides on removing ministerial immunity (this is the case in, for instance, Japan). However, procedures of impeachment have not taken this form in any of the four concerned systems.

These direct provisions of the constitution are of much less significance than some indirect conventions, e.g. a custom that follows from the appointment procedures. The prime minister can decide on the portfolio allocation and also reshuffle the cabinet. Recompositions, i.e. reshuffles, are therefore dealt with more in detail in chapter six.

3.4.5 Categorisations of Constitutional Impact

Several constitutional dimensions shape the competence of the premiership: some serve the structure and some serve the contents of decision-making. Provisions on cabinet appointment and parliament dissolution serve the structure. The contents-serving elements are of subordinate nature, such as provisions on countersignment. Rigid constitutions tend to focus on structure and contents, whereas flexible constitutions set only the political structure. The constitutional instruments that matter are the structural ones: the structural elements constitute institutional veto-dimensions of the premiership as they can undo the leadership and are used to influence

specific political contexts (e.g. a threat to dissolve parliament). The logic does not apply the other way around: the context-serving elements cannot contribute to altering the structure. Provisions on countersignment, referendum and impeachment have proved unimportant to the shaping of the prime ministership in all four systems (see also the previous chapter section).

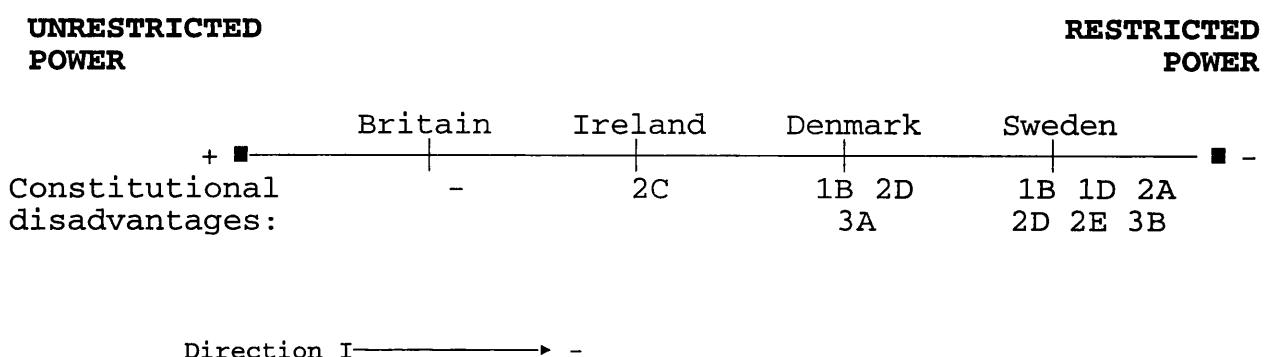
The executive's influence on the administration can equally be divided into direct and indirect influence. The direct usage of a constitutional instrument occurs in accordance with the letter of the constitution, whereas indirect influence is determined by the constitutional and practical context. The examples of Sweden and Denmark show the premier has been able to wield strong indirect influence, without having constitutional instruments that vest powers directly in the office itself. This possibility inevitably leads one back to the typology on i) competence *per se*, and ii) dependence (on other actors) described in chapter two (figure 1).

3.4.5.1 The Constitutional Profile: Competence versus Independence

The ambition is to describe 'constitutional profiles' based on important constitutional instruments. In a further elaboration this study wants to point to some weaknesses that shape the opportunities available to the office. On the next page the four offices of prime minister are positioned according to weaknesses that are likely to decrease the institutional domain of influence - the more weaknesses in the tables 1-3 of this chapter, the lower the position (see also chapter two on institutional domains). However, the role of this unidimensional heuristic device is that of only an introduction to further arguments below.

Figure 6. THE EFFECTIVE EXERTION OF EXECUTIVE POWER

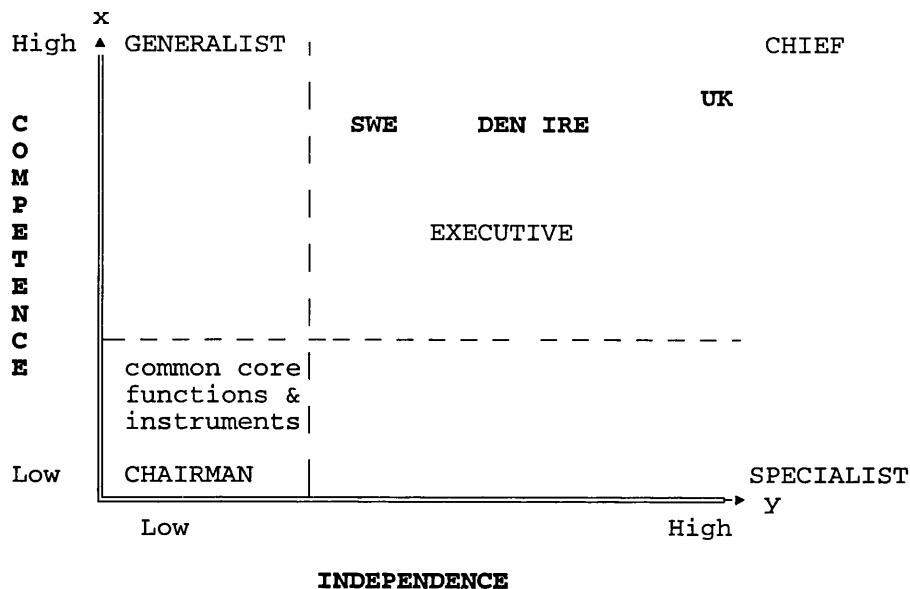
The general position of the prime minister: an initial heuristic



The disadvantages refer to respective points from the earlier tables. For instance, 2C refers to point C in table 2 of this chapter.

On an ordinal scale one is able to see that the British prime minister enjoys the least major constitutional restraints while the Swedish colleague is likely to encounter more major constitutional restraints than any of the other three premiers. The positions coincide with the age of the constitutional custom. The oldest flexible traditions are those of Britain, followed by the Irish constitution of 1937, the Danish of 1953 and, finally, the Swedish rigid constitution of 1974. If one were dealing with only one particular constitutional instrument, one could use unidimensional heuristics successfully. Despite the dangers of associating different constitutional features with each other, a two-dimensional typology is created below, based on the rudimentary dichotomisation of competence and dependence in chapter two (the theory). A number of constitutional instruments are vested in the prime minister, all of which contribute to outline the overall constitutional competence. However, the extent to which the instruments can be used is not only determined by the paragraphs that regulate this particular instrument, but depend also on other intertwined constitutional factors. The other parts of the constitution aggregate a certain level of dependence on other political actors when a prescribed competence is utilised. These two dimensions therefore create the prime minister's constitutional profile.

Figure 7. THE CONSTITUTIONAL PROFILE OF THE PRIME MINISTER



The plotting of the political systems is based on the earlier figure six. In the UK the prime minister's competence is far-reaching and, by convention, the deployment of many instruments is vested solely in the PM. The competence of the Irish prime minister is high, but the possible influence of the president and parliament is constitutionally prescribed and significant in an entirely different sense than in Britain. The Swedish prime minister cannot be a 'specialist' (low competence - high independence), as he/she enjoys less constitutional independence by virtue of the fixed parliamentary mandate and other restrictions. The Swedish constitution embroils the prime minister with a broad general competence ('the old king') which *a posteriori* is restricted by direct and indirect measures. The Danish solution is different, with the executive power still formally vested in the monarch. The Danish prime minister enjoys a broad competence by convention, which, *mutatis mutandis*, implies that only a few formal restrictions exist.

The role of a *pouvoir neutre* would typically in the figure be that of a specialist, a specialised independent competence, thus avoiding governance clashes. For a prime minister this position would seem odd: he/she would be only a figurehead capable of decision-making in a narrow area.

Why are all four systems located in the upper part of the figure? It is characteristic of the office of prime minister to exist on the generalist-chief axis with a high general competence, whereas the other members of cabinet have a specialist profile. The premier's level of competence is high in prime ministerial systems. The prime minister is the ultimate decision-maker; only the extent of this ultimate decision-making is decided by how much of a say the cabinet (and the parliament) has according to the structural arrangements. In semi-presidential regimes it is as feasible that the prime minister's profile is more that of a specialist. Since he/she has to share executive powers with a president, only certain constitutional instruments are vested in the premier, but in the usage of these instruments the prime minister can use his/her discretion. When the opposite (i.e. high competence, low independence) is the case in a dual executive system, this implies there is an evident conflict potential between the branches of the executive power (compare the French political system).

Different constitutional arrangements cannot explain why the prime minister has been seen as having only a 'specialist' or 'chairman' profile, as in Sweden or Denmark. The constitutional prerequisites are extensive in all four systems, with the important constitutional restraints (in especially Sweden) being significant only under extraordinary circumstances. All other institutional conditions being favourable, the prime ministerships thus have a considerable potential for exerting influence well beyond the *primus inter pares*. This conclusion is important for the thesis's framework, as the constitutional arrangements irrefutably define the paramount limits of the prime ministership's domain of action in a democratic system. The following chapters four to seven will discern which these other institutional conditions are and how they together can help define coherent or non-coherent institutional leadership profiles.

There are several reasons for recognising the constitutional profile as a point of departure. First, other dimensions, like inter- and intra-party politics, help to determine the profile of the prime minister more accurately, *but does so only within this constitutional framework*. Party politics, as a common utterance goes, decreases the possibilities of employing the constitutional instruments. This, by definition, implies that such factors cannot expand the scope of influence beyond the instruments that collectively constitute the constitutional framework, only possibly decrease the influence. The 'lame duck' paradox is the extreme point of wide competence but no independence in figure seven (high x, low y). The greater the need for a repressed premier to use certain instruments, the more uncertain it is they really can be utilised.

Second, the constitutional profiles help focus further efforts. If the premier's profile leans towards that of a specialist, any further examination should focus on those particular instruments the premier is able to utilise. The potential of a premier plotted constitutionally as a chief is obvious. However, a generalist premier can wield 'strong power' (ie. independence) if he/she is able to control other political actors. Control over other actors can be achieved in a variety of ways, notably with party-political means (the next chapter), whereas the opposite profile, the specialist, will have to expand the given scope of competence in order to achieve 'strong power', which is less likely.

Therefore prime ministers in semipresidential regimes can never achieve the same sphere of influence as their Westminster colleagues, in spite of decreased presidential power. Since they do not have a generally high competence profile, presidential resources are likely to be reallocated to the concerned ministers rather than to the premier. The difference between a 'generalist' and 'specialist' profile can also be seen as two different courses of constitutionalism: the power exertion of the former is controlled *a posteriori*, as in Sweden, whereas the power exertion of a specialist is curbed *a priori*.

Only certain parts of the constitutions play a significant role in the definition of the premiership and hence only at certain conjunctures. The Danish constitution could theoretically be applied to majoritarian Britain without creating any significant differences in the policy-making process. However, at the specific conjunctures this chapter has defined, the constitutional arrangements have an undisputable, and different, impact on the prerequisites for the national leadership. These are nevertheless specific crossroads in national politics. Other elements are also necessary to define the premiership. Blondel put it this way:

*"Over all, it is therefore essential that some behavioral strength exist in the executive>
Typically this strength comes from a strong and disciplined party..."¹³²*

Accordingly, after enlightening the paths paved by the constitutions, the next step of the study is to deal with the party dimension of prime ministerial leadership.

¹³² Blondel 1973, p. 129.

4. THE PRIME MINISTER AND THE PARTY

"... the details of the method of selection have often been decisive in determining which particular parliamentary heavyweight became leader. Probably the two most remarkable Conservative leaders of this century have been Winston Churchill and Margaret Thatcher - and it is questionable whether either would have become leader other than through the particular process that brought them to power."

R.M. Punnett, EJPR, 1993

4.1 The Party Leadership Dimension: An Introduction

Several general pleas for research in national executives, particularly the office of prime minister, have been made by Blondel, Weller and Jones.¹ In his concluding remarks on West European prime ministers Jones stated that the linkage between the prime minister and his/her party is the most important of all the premier's relationships.² Yet this niche has largely escaped comparative analysis. A workshop on party leadership was presented as a special issue of the *European Journal of Political Research* in the autumn of 1993, but it made only a few linkages to the office of prime minister.³ The party leadership is a pivotal element of any political system, but, ultimately one faces the question: *Is the prime minister also a party leader, or is the party leader also a prime minister?*

Why does the party leadership seem to be so important? One can cite the words of Patrick Weller, author of *First Among Equals*:

"Non-vulnerable prime ministers may be able to face periods of unpopularity, both in their party or in the electorate, with greater equanimity. Governments may therefore be more stable; hard decisions may be easier to take when consequences do not impinge directly on the leader's position... The potential for dismissal may be as important as the methods of election for structuring the relationship between leaders and followers."

¹ Blondel 1987, p. 29, Weller 1985, p. 2 and Jones 1991a, p. 1.

² Jones 1991b, pp. 173-174. See also Rose 1980 and Olsen 1980.

³ EJPR vol. 24 (pp. 229-347).

Furthermore, much debate on the office of prime minister, especially in Westminster systems, assumes prime ministers are secure from internal challenge. In his introduction to Bagehot, Crossman wrote: "... that a British party leader exerts such power and patronage within the machine that he can never be removed in real political life by public constitutional procedure. The method employed must always be that of undercover intrigue and sudden unpredicted coup d'état.".⁴ A similar point of departure has been apparent in the debate on party leaders in the Nordic countries. Party-internal politics has been seen as a support function rather than as checks and balances. The aim of this chapter is to compare the party-political vulnerability of the leader across political systems. Can even the strength or weakness of the office of prime ministership be traced, at least partially, to the institutional order within parties, as has been suggested above?

This chapter is divided into three separate sub-chapters. By way of introduction to the study of party determinants, a macro-perspective on the party system format will be put forward in this first section. The macroperspective is an examination of the position different parties have held on the national political scene in the four systems, Britain, Ireland, Sweden and Denmark. If one is to assess the office of prime minister in the light of the party leadership, a consideration of which specific parties (in each system) the study should focus on becomes essential. This chapter's approach will be slightly different from that of the preceding one. When dealing with political parties, it is impossible to separate different elements and examine them independently in the same fashion as with constitutional instruments.

One of the initial premises was to examine systems where there exist a party influence on the premiership. Hence all four nations in this study are political systems that have experienced dominant parties.⁵ This dominance makes the institutional linkage between the party and its leader all the more important. The party leader is also likely to be the national political leader. This chapter will take a comparative look at the making and unmaking of party leaders and how prime ministers have reached the office.

⁴ Crossman 1993 edition, p. 54.

⁵ Using Sartori's widely employed terminology, pre-dominant parties would be a synonymous expression.

4.2 The Macroperspective: The Dominant Parties

All four political systems have experienced a predominance of certain parties during the post-1945 era (1945-1991,⁶ see table five). The macroperspective should be conceived as an introductory *inter*-party dimension, necessary for the later *intra*-party microperspective. A prime minister from a party that dominates national politics initially seems to have all prerequisites for a dominant national leadership. Such a constellation is well exemplified by the Thatcher administration in Britain or by Tage Erlander's in Sweden. The prime minister is, under normal circumstances, also the *effective* leader of the largest government party.⁷ Even if the general importance of the party dimension is acknowledged,⁸ the dependent and intertwined relationship between the premier and the party has not been subject to political analysis defining and examining the party determinants that affect the prime minister.⁹

Which parties should the study concentrate on? The four party systems comprise a total of at least 30 active parties, all of which cannot be analyzed within the limits of this chapter. The study will i) measure the dominance of parties on the national scene, ii) look at the relationship between general elections and the appointment/resignation of prime ministers, and iii) look at the party affiliation of the prime minister (tables five, six and seven respectively).

Table five on the following page summarises the measurement of party predominance. A common indicator is the basic government-opposition distinction measured in years. This indicator is the basis, but other aspects can with ease be illuminated by using the same data. The absolute number of years in government can be completed with the governmental position expressed in per cent (indicator A %). These indicators are very general. The distinction between cabinet participation and cabinet leadership is important for a study of the premiership. Three additional indicators below relate to this: the number of years of one-party

⁶ This period is used since compatible cross-system material is available from the same sources.

⁷ Usually there are several leading posts in a party, the parliamentary leader and the leader of the national party.

⁸ See, e.g., Jones 1991b, p. 174.

⁹ Some articles on the topic have been published in Britain, mainly in *Parliamentary Affairs* (e.g. vol 43/nr 2). See also Weller 1985.

reign, one-party reign as per cent of government participation and the extent to which cabinet participation has equalled cabinet leadership (B, C and D respectively). Indicator C expresses the one-party reign as per cent of the number of years a party has been in government (i.e. the number of years in B).

Important for successful policy implementation is continuity in office, which is expressed as the longest period of years of uninterrupted governmental position (indicator E). Finally, indicator F expresses the average share of votes during the post-war era (expressed with one decimal because of minimal differences between the parties). With the help of these indicators of one-party reign and the 'political pendulum' (the periods of uninterrupted governmental position) a picture of the position of the key parties in the four systems is put forward on the next page.¹⁰

¹⁰ Some ideas for table one, albeit heavily modified in our study, are based on an essay by Therborn on the Swedish Social Democrats (Therborn 1988).

Table 5. THE DOMINANT PARTIES

A comparison of party dominance with 16

European democracies as a reference.¹¹

| | A | | B | | C | D | E | | F | G |
|---------------------------|-----------|------------------------|-----------|-----------|------------|------------|-----------|-----------|-------------|-------------|
| | yrs | % | yrs | % | % | % | yrs | % | % | % |
| UK: Conservatives | 55 | 75 | 36 | 49 | 65 | 93 | 13 | 13 | 43,2 | 49,7 |
| IRE: Fianna Fáil | 45 | 66 | 24 | 35 | 53 | 100 | 17 | 25 | 45,7 | 48,7 |
| SWE: SAP | 56 | 84 | 41 | 61 | 73 | 100 | 40 | 60 | 45,5 | 47,0 |
| DEN: Soc.demokratiet | 40 | 56 | 18 | 25 | 45 | 100 | 14 | 20 | 36,0 | 36,6 |
| All 16 nation high | 56 | 84¹² | 55 | 61 | 100 | 100 | 40 | 60 | 45,7 | 49,7 |

Sources: Butler & Butler 1994, Facts on File (various years), Flora 1983, Katz & Mair 1992, Keesing's (various years), Mackie & Rose 1991, Paloheimo 1984, Therborn 1988 and Truhart 1985.

Indicators:

- A** = Cabinet participation measured in years and per cent from the introduction of universal male suffrage¹³ to 1991.
- B** = Years and per cent of one-party reign during the same period (total).
- C** = One-party reign as per cent of the years in government (including wartime coalitions)
- D** = Cabinet leadership as per cent of years of cabinet participation
- E** = Longest period of uninterrupted governmental position from introduction of universal male suffrage to 1991.
- F** = Average share of votes (per cent) during the post-war period.
- G** = Average share of parliamentary seats (per cent) during the post-war period.

* "All 16 nation high" is a reference indicator, which stands for the highest found value among the 16 chosen nations. As an example, in A (years) SAP represents the highest figure (56 years), hence this is the value also in this reference column.

Nota Bene: The abbreviation SAP stands for the Social Democratic Labour Party/Sweden

¹¹ The nations are: *Austria, Belgium, Britain, Denmark, Finland, France, Germany, Greece, Holland, Iceland, Ireland, Italy, Norway, Portugal, Spain and Sweden*. All nations mentioned are listed in Mackie & Rose 1991. Because of missing cabinet data in other sources Luxembourg is excluded from the list.

¹² The Belgian Christian Social Party (PSC/CVP) also stands for 84 per cent, the same value as for Swedish SAP.

¹³ As for this information the study has relied on Mackie & Rose 1991.

The table above lists the most dominant party per nation and contrasts its position with a reference indicator, the highest figure among 16 nations. All four political systems have experienced periods of predominance of certain parties. Particularly the Swedish Social Democrats have dominated the national scene, as measured in table five. The Swedish Social Democrats stand for the highest figure in seven of the indicators. The four systems represent different party systems. Britain is the most obvious two-party system. Ireland is a multi-party system, but, from the point of view of the premier's party affiliation, Ireland could be categorised as a two-party system (see table seven). In Britain the Conservatives, in a long-term perspective, have been in a dominant position in comparison with Labour. When looking at the Conservatives' 53 per cent share in A, the corresponding figure for Labour would be 18 per cent only (the rest of the time, as for indicator A, Britain has been governed by the old Liberals or wartime coalitions). Measured as the number of prime ministers, 11 Conservative party leaders have been prime ministers, whereas Labour has had seven party leaders in office (the post-1945 party leaders are listed in an appendix).

Looking at indicator A, the British Conservatives and the Swedish Social Democrats have dominated their respective political scenes for the longest periods of time (absolute number of years) since the introduction of [at least] universal male suffrage. Expressed in per cent, which doubtlessly is the more important figure, Irish Fianna Fáil and Swedish SAP have been very dominant indeed. The Swedish Social Democratic party is, with its 84 per cent share, the most dominant amongst all parties in the 16 nations in table five. Thus, the party on national terms has been the most important of West European Social Democratic parties. This argumentation is strengthened by indicators B and C. SAP has been the sole party in power in Sweden for 61 per cent of the time since the introduction of universal male suffrage. Indicator D shows that 73 per cent of the time SAP has been in power, it has governed through a one-party cabinet. These figures are high indeed, of the industrialised democracies listed in Mackie & Rose only Japan stands for a higher figure (98 per cent of A and 91 per cent of B).¹⁴

¹⁴ Two remarks: 1) the time continuum of table one is longer than the general post-1945 perspective of this study. 2) no developed democracy outside the scope of this table accounts for higher figures, save Japan.

A comparison of indicators A, B, C and D hints at the so-called 'coalition elasticity' in the four systems. Indicator C is the clearest single indicator. The British Conservatives have been members of one-party cabinets (the national and wartime coalitions are included in the figures), whereas the figures for Ireland and Denmark are on both sides of 50 per cent, even that a fairly high figure. In this respect Swedish SAP stands for an even higher figure, 73 per cent. Indicator D, the cabinet leadership position as of the years of cabinet participation, confirms that the parties have not only participated in cabinets but also, practically without exceptions in modern times, lead them (this would not be the case if the *two* most dominant parties per nation had been included in the table). In Britain and Ireland this is essentially the case (even though it is wise to recall the coalition character of Fine Gael-governments), but in Sweden and Denmark the respective 'second' parties have also participated in government without gaining the office of prime minister (Swedish Moderate Unity Party and Danish Conservative People's Party).¹⁵

Indicator E delivers a different perspective. It points to how the political pendulum changes in different systems. The longest period of uninterrupted government is around fifteen years in three of the four systems. Swedish SAP, however, was 40 years uninterruptedly in government (which is 60 per cent of the time since the introduction of universal male suffrage in Sweden). With indicator F, Irish Fianna Fáil has collected the highest average of votes during the post-war era, and the deviation between seats and votes gives the British Conservative party the overall lead in the average per cent of seats. The differences are however small, especially with indicator F (compare the Conservatives and SAP). The Danish Socialdemokratiet has played a dominant role in Danish politics, but not to the same extent as its Swedish fellow party.

These figures show that certain parties have provided their prime ministers with, at least, the external conditions for a dominant position. In many cases it is a sufficient condition to be a party leader to become prime minister, as is shown in table six below (the link between general elections and the appointment/resignation of prime ministers).

¹⁵ Between 1976 and 1982 the Swedish Moderates participated in two out of four center-right governments. In Denmark, the Conservatives participated in a government headed by the Social Liberals (*Radikale Venstre*) from 1968 to 1971.

Table 6. PRIME MINISTERS AND PARLIAMENTARY ELECTIONS 1945-1991

The pathways to and from power.

| % | 1. Became Pr.M. following general election | 2. Became Pr.M. during mandate of parliament | 3. Ceased to be Pr.M. following gen. election | 4. Ceased to be Pr.M. during mandate of par. |
|--------------------------------|--|--|---|--|
| UNITED KINGDOM n=11 | 55 | 45 | 45 | 55 |
| REPUBLIC OF IRELAND n=14/13 | 79 | 21 | 77 | 23 |
| SWEDEN n=8/7 | 50 | 50 | 57 | 43 |
| DENMARK n=13/12 | 62 | 38 | 58 | 42 |

Sources: Butler & Butler 1994, Facts on File (various years), Flora 1983, Katz & Mair 1992, Keesing's (various years), Mackie & Rose 1991, Therborn 1988 and Truhart 1985.

Wilsons premiership in Britain counted as two (1964, 1974).

The basic feature of table six is the comparison of how many prime ministers attain the office after general elections as against the number who reach the office during the lifetime of a parliament.¹⁶ The majoritarian character of the British system is evident in the autonomous position of the British cabinet *vis-à-vis* parliament, expressed in the high figure in column 4. It is paradoxical that a two-party and majoritarian system creates a context in which a considerable number of the prime ministers change without elections. The British majoritarian system generally promotes a cyclic change of power, as small differences in the electorate are apt to produce comparatively sweeping changes in the distribution of seats in parliament (between the two major parties). The difference between the two Westminster systems is remarkable. Although the mandate of the Irish parliament is five years, relatively many changes have occurred, the majority of which have been through general elections.

¹⁶ See also King 1991.

Between the two Nordic nations the differences are minimal, but one has to keep in mind the differences in the number of incumbents, which is almost the double in Denmark. Nevertheless, the figures for change without general elections seem comparatively high. Yet the table is a general comparison. It could be developed by making a distinction (albeit difficult) between political and non-political reasons for mid-term resignations. Resignations will be dealt with in chapters five and six. In both Sweden and Denmark two incumbents died in office, which distorts the present proportions (especially for Sweden which has had very few incumbents). The absolute number of cases is small in all four systems. Where two absolute numbers (n) are mentioned, the first corresponds to the total number of cases for 1 and 2 (becoming prime minister) and the second to 3 and 4 (ceasing to be prime minister). Ireland and Denmark have the highest number of changes in the office of prime minister, and a relatively high per centage of prime ministers reaching the office through general elections. As the table reflects the change of individuals in the office of prime minister, it partly reflects the pace of the political pendulum in the four systems, and the extent to which general elections are an important means of solving political conflicts. In Denmark significant changes in the cabinet's political colour have taken place without general elections, e.g. when the Conservatives' Schlüter became prime minister in 1982 as well as when the next change took place, in January 1993, when Schlüter was forced to resign.

The inner workings of key parties are essential for understanding both the rise and fall of prime ministers. The party leadership has been the sole basis for acquiring the premiership in up to half of all post-1945 cases (Sweden). In every case accounted for in column four, a prime minister resigning in the midst of a parliamentary mandate, the prime minister was or had been the leader of his/her party. According to other data, presented in chapter six, up to 24 per cent of the premiers' resignations have been 'voluntary' resignations caused by no-confidence within the party or in the parliament.¹⁷

¹⁷ On the usage of the term 'voluntary' resignation, see chapter six.

4.3 The Microperspective: Dependency on the Party?

4.3.1 The Framework for the Party-Internal Dimension

Based on the macroperspective, crystallised in table five, all four political systems have experienced predominant parties. The implication is that the prime ministers have had the external preconditions for effective leadership. In all four systems party leadership has been *a conditio sine qua non* for the office of prime minister.¹⁸ In all four systems there has been an almost complete correlation between being the largest party in government and the acquisition of the premiership.¹⁹ Accordingly, an analysis of the institutional inner workings of parties should be included in an analysis of the premiership. If one wants to draw any conclusions about the position of the prime minister in the political system, the following constitutes one of the points of departure:

- a) How is the party leader selected? and
- b) How can the party leader be de-selected?

From what perspectives can the complex relationships between the party and its leader be assessed? The making and unmaking of a party leader is of interest from two angles, crystallised in the questions *how* and *why*? This study cannot, and should not, elaborate the second less institutional question at length because of its undeniable *ad hoc*-nature. Yet one can lay out a theoretical perspective on party leadership as a point of departure for the two questions. Based on, among others, Kiewiet and McCubbins,²⁰ Strom described four measures by which so-called *agency problems* can be controlled.²¹ Agency problems refer to possible risks of the party leader's intentions and actions (referred to as *the central agent*) not being

¹⁸ There are not many examples of systems where party leaders are not regularly appointed prime ministers. However, a European exception to the rule is the Netherlands.

¹⁹ See Budge & Keman 1990, pp. 118-132. The only one of our four nations for which they do not recognize a complete correlation is Denmark (Conservatives, see table 4.4 in *ibid.*).

²⁰ Kiewiet & McCubbins 1991.

²¹ Strom 1993.

the same as those of the party members (referred to as *the principals*). When these interests collide in the form of 'agency problems' one confronts the question of making and unmaking the central agent - the party leader. To reduce such agency problems the principals keep track of their agents by four basic means:

- a) screening and selection mechanisms
- b) contract design
- c) monitoring and reporting requirements
- d) institutional checks

Point a refers to the efforts by the principals to ensure their interests will be taken care of through mechanisms of screening and selection. Point b includes the initial deal between the principals and their agent: this contract includes compensation, rules and terms of the leadership and its election. Point c is a logical continuation of point b, once the stage of selection has been successfully completed. The fourth point is concerned with other special mechanisms ensuring the primacy of the principals' interests. Strom exemplified this by mentioning critical decisions by the agent which have to be submitted to other agents, or principals, who may be in a position to veto important decisions. As an example one can conceive party leadership decisions that require the consent of other bodies of the party.

The aim is to deal with all four aspects to the extent they are of concern for the office of prime minister. Another way of systematising an analysis of party leadership is to make a distinction between particular events, like the election of a leader, and the day-to-day exercise of party leadership. It is common, and easy, to concentrate on point b at the expense of c. Does the party exert power over its leader only at certain events or does it possess other means of ensuring the leader stays continuously in the fold? How strong a hold over the party leader (hence also the prime minister²²) do different parties have? Are there evident differences between parties, both within and between systems? How can the relationships between the principals and their agent be measured? Party dominance institutionally presupposes the following:

²² To proceed with the reasoning, it is a general assumption in this chapter that the party leader is the prime minister, unless otherwise stated.

| | |
|-------------------------------------|---|
| Presumption A: (theory) | Party statutes and/or practice establish substantial means of influencing the party leader. |
| Presumption B: (practice) | The party, or the relevant party body, is united enough to make use of the party statutes. |

The most rigid means of exerting influence over the premier is, in all likelihood, to threaten his/her professional existence. From a theoretical point of view there are three general categories of reasons for leaving the office:

- a) a parliamentary defeat
- b) a party leader election defeat
- c) personally to resign

The first point is, chiefly, in the hands of the electorate, and is so only at the specific time of general elections (the time of which often is decided by the prime minister). In other cases point a is less interesting for this study, specific parliamentary conflicts have to be judged *in casu*. Point c is to a great extent in the hands of the prime minister himself/herself (no attempt to separate 'involuntary' and 'voluntary' resignations is made at this stage, see chapter six).²³ Therefore it strictly is only the party [in other words the *part* of the party that selects the party leader] that can exert the strongest pressure upon the prime minister through point b - by threatening to replace the party leader/prime minister. The essence of the party leader's dependency on the party is embedded in point b: the party leader selection. This selection process has to be complemented with other possible sanctions available to the party, or to groups within it, that potentially could end up overthrowing the party leadership. Thus, does the method and electorate of party leader selections determine a great deal of the institutional boundaries within which prime ministers have to act?

²³ See also Alderman & Smith 1990, pp. 270-271.

4.3.2 Which Parties Should Be Included in the Analysis?

It is not plausible to study all existing parties in the four political systems, not to mention all party leader elections. Before proceeding further the parties of potential importance for the premiership have to be defined. To paraphrase Sartori's work on party systems,²⁴ the purpose is to pick out the *relevant* parties in the four systems. Sartori's concept *cabinet potential* is of particular interest for the premiership. Parties with only *blackmail potential* are of certain relevance in systems with a vote of investiture or other institutional means of putting small parties in a pivotal position, but do not contribute to explaining the linkage between the premiership and the party leadership. The point of departure is that cabinet potential almost equals to prime ministerial potential. In this context it is appropriate to take a look at the party affiliation of the prime minister in the four systems.

Table 7. THE PARTY AFFILIATION OF THE PRIME MINISTER 1945-1991

Expressed in per cent based on the number of days in office.

| BRITAIN | | IRELAND | | SWEDEN | | DENMARK | |
|--------------------|-------------|----------------|--------------|-------------|-------------|--------------------|--------------------------|
| Conserv- atives | Labour | Fianna Fáil | Fine Gael | SAP | others | Social- demokr. | others |
| % 63,2 | 36,8 | 67,4 | 32,6 | 86,9 | 13,1 | 59,2 | 40,8²⁵ |
| %total 100 | | 100 | | 100 | | 100 | |

Sources: Facts on File (various years), Flora 1983, Katz & Mair 1992, Keesing's (various years, Mackie & Rose 1991, Paloheimo 1984 and Therborn 1988.

²⁴ Sartori 1976, pp. 122-123.

²⁵ Includes the 19,9% share of the Conservative People's party.

Table seven shows another profile of the political systems than table five. In the two Westminster-systems it is reasonable to examine the two largest parties. From 1945 to 1995 all British prime ministers have belonged to the two major parties. When one looks at the Irish Republic, one has to keep in mind that Fianna Fáil governments to a great extent have been one-party governments (see table five), whereas governments with a Fine Gael *Taoiseach* have been coalitions.²⁶ Sweden has yet another profile. The Social Democratic dominance is as evident as in table five. In Denmark the one-party dominance is weaker in comparison with the other three systems; but considering Denmark's multi-party system and its comparatively short-lived governments,²⁷ the figure of almost 60 per cent for Socialdemokratiet must be considered high. The corresponding figure for the main ideological opponent, the Conservative People's party, is 19,9 per cent (included in the 'others' 40.8 per cent share).

Accordingly this study will analyze the two largest parties per nation, even if one could justify an examination of just SAP in Sweden from tables five and seven.²⁸ The premier's political abode has been the two largest parties to an extent of 91.5 per cent (on the average, all four nations, 1945-1991). Because of the position of these parties, the implicit or explicit assumption that their party leader might become the leader of the nation must be present when the effective party leader is selected. The analyzed parties are therefore on that same starting line, as the assumption of national leadership might influence, possibly even change, the rules and processes of the party leader selection. An ideological balance is achieved through this choice. The two Westminster systems have been dominated by non-socialist parties,²⁹ and the Nordic block by social democratic parties, which could introduce an additional interesting axis to the study. The Moderate Unity party is the second analyzed Swedish party (in Sweden there has been one premier each from three other parties than SAP. The Moderate Unity party, the Centre party and the Liberal party have had one prime minister each). Its Danish equivalent is the Conservative People's party.

²⁶ See, e.g., Mair 1989, p. 131.

²⁷ Budge & Keman 1990, p. 160.

²⁸ The two largest parties with regard to the party affiliation of the prime minister (table three).

²⁹ One should, however, keep in mind the cross-class character of Fianna Fail and other Irish parties in general, see, e.g., Garvin 1981, p. 112.

THE PARTIES INCLUDED IN THE ANALYSIS:

Britain:

- 1) The Conservative Party
- 2) The Labour Party

Republic of Ireland:

- 3) Fianna Fáil
- 4) Fine Gael

Sweden:

- 5) The Social Democratic Labour Party (SAP)
- 6) The Moderate Unity Party

Denmark:

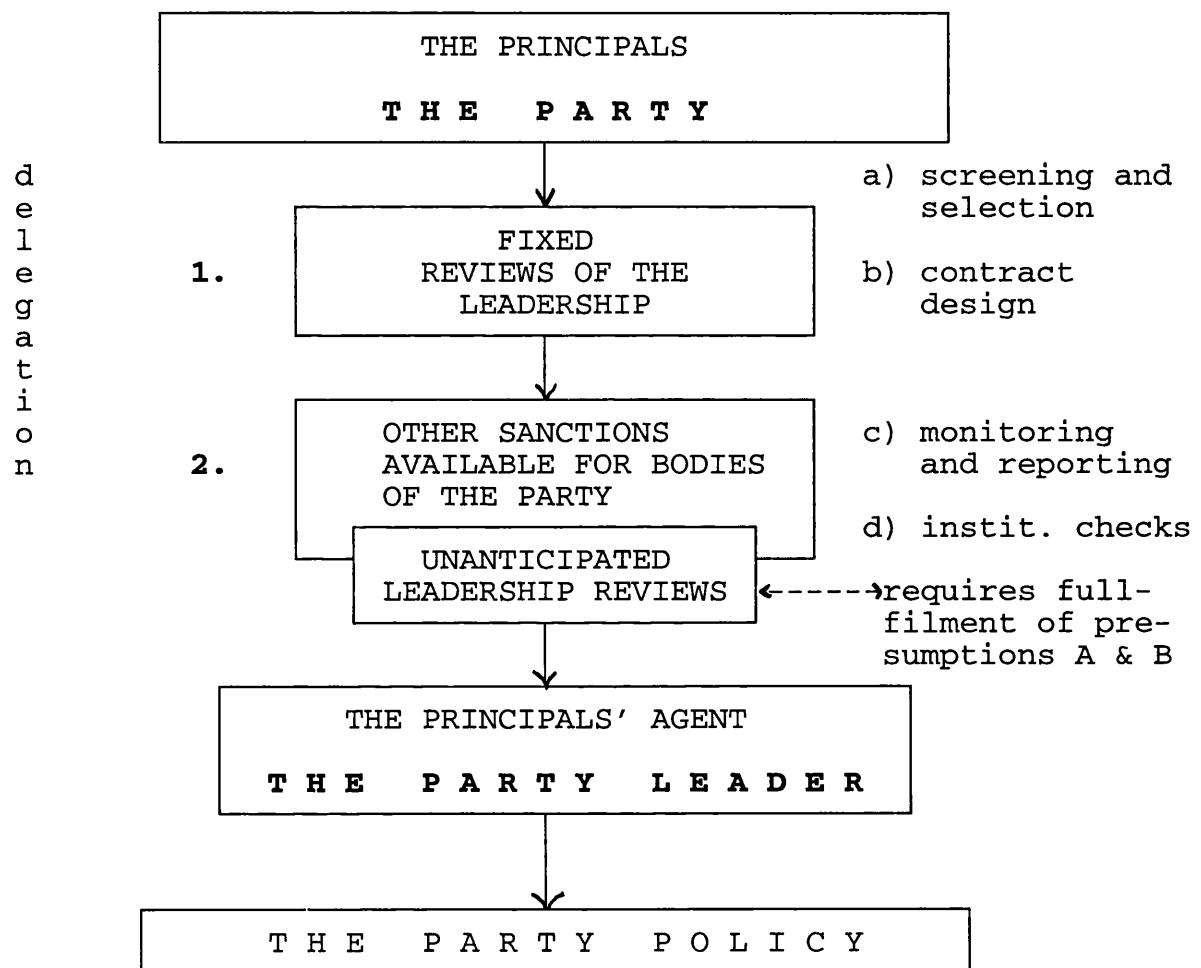
- 7) The Social Democratic Party
- 8) The Conservative People's Party

4.4 The Selection of the Party Leader: the Party Leadership Contract

By what body of the party are party leaders elected or, in a broader sense, selected? Are prime ministers answerable to their party supporters? As Weller has stated, answerability implies sanctions.³⁰ Do parties have any real means of exercising sanctions? If one wants to answer that question, one has to explore what these means might be and by what parts of the party they may be exerted. As stated above, appointments and dismissals of party leaders are the most evident institutional means of establishing a dependent relationship between the party and its leader. Referring to the earlier distinction between particular events, like elections and day-to-day leadership, one can make a division between *fixed leadership reviews* (regular or ordinary party leader elections within a certain interval) and other sanctions available, which ultimately could end up as an *extracurricular leadership review*. One of the presumptions of this work is that the structure, 'the party leadership contract', creates a variance which is reflected in the premiership, or at least imposes some limits on its scope of influence.

³⁰ Weller 1983, p. 96.

Figure 8. THE STRUCTURE OF THE PARTY DEPENDENCY



The party rules will be compared based on party statutes; but how meaningful is it to look at party statutes and rules? Party statutes have been compared to constitutions in miniature.³¹ The discrepancy between letter and practice that characterises many national constitutions should not be as apparent when dealing with party statutes. Party statutes are frequently revised, which is a sign of an attempt to minimise the distance between the letter and practice (in the systems here dealt with the party statutes have often been revised).³² Lindman has stated that party statutes 'lack a certain nimbus connected with national constitutions': statutes are practical norms for action, which helps keep letter and practice close to each other.³³

4.4.1 The Westminster Block: Procedures in Britain and Ireland

Britain has experienced eleven prime ministers since 1945, if Wilson's premiership(s) is counted as two. There are two ways of becoming prime minister, through successful party leader elections only or party leader elections and successful parliamentary elections. Ireland has had nine different incumbents in the office of prime minister, changes of which have, however, occurred on as many as 15 occasions. The party system and coalition elasticity are wider in comparison with Britain.

³¹ Lindman 1957, p. 9.

³² See Katz & Mair 1992.

³³ Ibid.

4.4.1.1 The British Conservative Party

Before 1965 the party leadership election of the Conservatives was uncodified and described as elitist and informal. Leadership was settled by the party élite through informal negotiations (compare Macmillan's "*customary process of consultation*"³⁴). Senior ministers would virtually determine the outcome.³⁵ This secrecy and informality are evident in the leader selections in 1955, 1957 and 1963. On these occasions both the party leadership and the office of prime minister were vacant. The political climate of the 1960s and the events of 1963, when Mr Macmillan advised the Queen to send for Sir Alec Douglas-Home, forced the Conservatives to change the party leadership selection in a more democratic direction. Since, the leader has been elected by the party members of the House of Commons (with the provision that other parts of the party have to be consulted). The procedure has slightly been revised in 1974-75, 1989 and 1991.³⁶ However, Mrs Thatcher and Mr Major were in practice selected in the same way as Mr Heath.

The current procedure is as follows. Any candidate has to be proposed and seconded by MPs, whose names are made public (since 1989).³⁷ In a first ballot a nominee, who need not be an MP, is elected party leader only if the nominee receives an absolute majority of over 50 per cent of those entitled to vote *as well as* 15 per cent more of the votes than any other candidate (again of those entitled to vote). Usually the contest has been settled at this primary stage. If none of the nominees fulfils these two demands, all nominations become void and new nominations must be done for a second ballot. New candidates are able to enter the contest at this stage (compare Mr Major's entry in the selection process against Mrs Thatcher). In the second ballot the winner of an overall majority (of those entitled to vote) is elected

³⁴ Punnett 1993, p. 260. Punnett argues that the process had been far from customary. The consultations had taken a different form on each of the occasions they had been used.

³⁵ Alderman & Smith 1990, p. 266.

³⁶ King 1991, p. 26. See also Punnett 1993, p. 262. According to information from the Conservative Central Office [February 1994] the procedures for selection have never been published. A copy of the internal party paper (4 pp.) can be obtained from the Central Office in London.

³⁷ The nomination closes five days before the date of the first ballot (Procedure for Selection... 1991, p. 1, section 4). See also the 'Procedure for Consultation', sections 6-11, in *ibidem*.

party leader. If no nominee is elected in the second ballot, a third is arranged (at the time of writing [1996] no third or fourth ballot has ever been held). Entitled to enter the third ballot are the three nominees with the largest number of votes from the second ballot. The third ballot uses a different procedure. MPs indicate their first and second preferences of the three candidates. The candidate with the least number of first preferences is eliminated from the contest, as are his/her first preferences. Subsequently the votes of the eliminated candidate are redistributed among the two other candidates according to the second preference. If the ballot results in a tie and the two candidates are unable to resolve the matter between themselves, a similar, fourth ballot will be held.³⁸ The victorious candidate has then to be confronted with a last obstacle: a presentation for endorsement at a party meeting composed of MPs, MEPs, Peers, parliamentary candidates and some members of the party organization outside parliament.³⁹

The aim at all stages of this selection process is to create a party leader with as broad an acceptance as possible within the party. Yet the outcome in the election of 1975 was not seen as consensual.⁴⁰ On the other hand, the system seemed to work in the selection of Mr Major in 1991. The method(s) of election should not, however, be overtly stressed in themselves. The candidacy is in itself of crucial importance. If the possibility of a defeat looms large, it is customary to withdraw one's candidacy, as did Mrs Thatcher. This would also help keep the party more united, which is the overall aim. The possibility left open for new candidates to enter the contest in a second ballot has proved to be important as well. When Mrs Thatcher was elected (1975) and rejected (1990), this rule proved to be of notable importance, albeit in different ways.⁴¹

Rather than the question *how*, the chronologically preceding and, for the incumbent, more pertinent question is *when*. The rules that stipulate that a review of the party leadership can be held at the beginning of each new session of parliament institutionalises an annual

³⁸ See Procedures for Selecting... 1991, p. 4, section 22.

³⁹ Punnett 1993, p. 263.

⁴⁰ Ibid., p. 44.

⁴¹ See Punnett 1993, p. 265.

opportunity of leadership review.⁴² However, since 1991, this rule is activated only on the written demand of 10 per cent of the MPs. Such a request has to reach the Chairman of the 1922 Committee within three months of the opening of parliament and within 14 days of the opening of the session in other years.⁴³

4.4.1.2 The British Labour Party

Labour's present method of electing a party leader is different and was introduced in 1993. There have been three significant changes in the way the Labour leader is elected. Before 1981 the selection of the Labour leader simply lay with PLP (the Parliamentary Labour Party). A victorious candidate was required to obtain an overall majority of votes, if needed through a series of ballots, which each eliminated the candidates with the least number of votes. On the election of a Labour leader, Punnett stated that:

*"In support of this method it was argued that the selection of the leader by his colleagues in Parliament is the most logical method in a parliamentary-cabinet system."*⁴⁴

Between 1981 and 1993 the Labour leader was elected by an electoral college at the annual national conference.⁴⁵ The 1993 changes are based on that previous election method. The electoral college consisted of three different assemblies: i) the party's MPs, ii) constituency Labour parties and iii) trade unions affiliated to the party. These groupings had the following voting strength: the parliamentary party 30 per cent (including MEPs), constituency parties 30

⁴² In case of the assembly of a new parliament the election shall be held not earlier than 3 months or later than 6 months from the date of assembly of that parliament (Procedure for the selection... 1991, p. 1, section 2).

⁴³ In ECPR 24/1993 Punnett (erroneously) writes that the contest has to be held *within* these limits (probably as a result of simply mistaking *contest* for *request*).

⁴⁴ Punnett 1990, p. 180.

⁴⁵ On the change of method, see King 1991, p. 27 and Punnett 1990, pp. 180-182. King described the 1981 change as radical.

per cent and affiliated trade unions 40 per cent. Each MP and MEP had one vote per ballot as had each constituency regardless of its size. The trade unions' share of the votes was determined by the number of members affiliated to the party. At the end of the day a victorious candidate had to achieve a majority of the total votes of this electoral college. This method was introduced as a result of severe intra-party pressure demanding a 'democratization' of the party.⁴⁶ In the Labour party the party leader must, contrary to the Conservatives' rules, be an MP at the time of election.⁴⁷ Any candidate must be nominated by another MP, a constituency party, a trade union or another affiliated organization *and* have the support of 20 per cent of the parliamentary party. This provision implies that the PLP has a *de facto veto* over candidates, especially over candidates that enjoy extensive support outside the PLP.⁴⁸ As opposed to the Conservatives, Labour makes a *de jure* distinction between being in opposition and in government. If Labour is in government, a party leadership election is arranged only if a formal vote of no-confidence in the leader is passed by the party conference. The procedure of election is initiated by a two-thirds majority of the conference.⁴⁹

There have been recent⁵⁰ and drastic changes in the rules. After a long-time internal debate the 1993 changes of rules were made to correspond to the ideal of "*one-member-one-vote*".⁵¹ These provisions were used to elect Mr Tony Blair party leader in the summer of 1994; but without practical precedents, some of the rules for long remained unclear. As of today [1996], the procedure for electing the Labour leader is the following. The leader is elected by the proportional method of single transferable vote (stv) by an electorate divided into three main blocks (the same main blocks as under the 1981 rules). The proportional weight of the three

⁴⁶ Ibid.

⁴⁷ Ibid. (quoting Labour Party Procedural Rules, Rule 5, 'Election of Officers').

⁴⁸ Punnett 1993, p. 265.

⁴⁹ Ibid., pp. 27 and 44 (quoting the above mentioned rule 5 (3), (d), (ii)). Cp. Punnett 1990, pp. 182-183.

⁵⁰ The rules were changed at the party conference in Brighton in September 1993.

⁵¹ Often referred to, in an abbreviated form, as 'omov'.

blocks has however been reviewed under the new rules.⁵² Voting still takes place in the same three sections, with each section now accounting for a third of the total vote. The first section consists of the 4.5 million union members that pay a political levy, the second section consists of the individual party members (about 250.000 people), and the third of the Labour MPs and MEPs. As opposed to the earlier varying internal voting practices within the unions, they are now all expected to use individual postal ballots of levy-paying members.

In case of a vacancy in the office of Labour party leader, each nomination must be supported by 12.5 per cent of the PLP.⁵³ Nominations may be initiated by MPs, affiliated organizations, constituency parties or Labour MEPs. In case of nominations without a vacancy, i.e. a leadership challenge, the rules state that "*the nominations should be sought on an annual basis*".⁵⁴ Each leadership challenge must be supported by 20 per cent of the PLP to be valid. This rule ensures a high threshold for a leadership challenge and effectively minimises the number of challengers to a theoretical maximum of five and a realistic maximum of two. All nominees must be Labour MPs.⁵⁵ The element of surprise in leadership elections is minimised by paragraph 5.1 (e), which states nominations have to be submitted two weeks before the commencement of voting.⁵⁶ The rules do not mention that the method of election is single transferable vote, but it was agreed upon later stage, after taking advice from the party's solicitors.⁵⁷ The rules could earlier strictly have been interpreted as meaning that the party would have to hold a series of ballots and go back to the whole electorate each time until a candidate receives half the votes cast.

⁵² See The Rule Book 1993-1994 of the Labour Party, pp. 25-27 (Rule 5 - Election of Leader and Deputy Leader).

⁵³ The Rule Book 1993-1994, Rule 5, 1 (b).

⁵⁴ The rules are somewhat vague on this point, in a strict sense it not clear whether *should* states an imperative condition, neither do the rules explicitly refer to the party conference (i.e. the door is left open for final considerations by the National Executive, see also Rule 5.3 (b)).

⁵⁵ Rule 5.1 (d).

⁵⁶ However, the rules address the deadline of nominations on vague terms, stating the following "... nomination within two clear weeks before the commencement of the procedures of voting set out in rule 5 (2).".

⁵⁷ Cf. paragraphs 5.2 (b)-(c) in the Labour Rule Book. See also, e.g., Financial Times 14 May 1994 "Voting rules for leadership fight to be clarified".

The Labour rules still connect the two offices of party leader and prime minister in a concrete way. The rules state that when the party is in government *and the party leader is a prime minister*, a leadership election shall take place if and only if requested by the majority of the party conference on a card vote. This provision is very close to a clear vote of no-confidence, especially by prescribing a card vote, not a secret ballot.⁵⁸ *De facto* the rule implies two things. First, on a dimension of time, it implies security for the incumbent. There are no legal means of threatening the position of the premier-party leader through the party leadership on occasions other than the yearly party conference. Theoretically, the party puts no concrete constraints on its leader as long as he/she (i) is the prime minister, and (ii) does not have a majority of the party conference explicitly against him/her. The distinction between successfully nominating a challenger, with the consent of 20 per cent of the PLP, and a party conference majority's request for a leadership election should be noted. *Ergo*, if 20 per cent of the party's Commons members (theoretically only 6.6 per cent of the total leadership electorate) were to nominate a challenger, the challenge must explicitly be approved of by a party conference majority. Hence, the linkage between the office of prime minister and the party leadership is very strong in the Labour party. The party provides only a minimum of constraints on its *prime minister*.

When, on the contrary, the party is in opposition, a postal ballot has to be held and a temporary leader appointed until the outcome of the nationwide ballot. Furthermore, this paragraph must be contrasted with the rules that state that when the party is in opposition, an election of the Parliamentary Leader and the Deputy Leader shall take place at each annual party conference (according to clause VI, p. 12 in the Rule Book, the party's leader and deputy leader are *ex officio* leaders of the parliamentary party).⁵⁹ At present, the Rules of the Labour party do not recognise the possibility of being in government as a minor partner, in other words being in cabinet without holding the office of prime minister.

⁵⁸ The Rules, paragraph 5.2 (d).ii.

⁵⁹ Rule 5.2 (d).

4.4.1.3 The Irish Fianna Fáil Party

The selection of leader within the most dominant post-1945 party in Ireland, Fianna Fáil, seems highly consensual and informal. The contrast in comparison to the above described British Labour party rules is striking. Very little about any *formalia* is mentioned in the minimalist party constitution or other related documentation.⁶⁰ This situation is conceivably caused by the "*almost 'Stalinist' tradition of solidarity in the face of opposition pressure.*" that for instance Garvin accounts for.⁶¹ As of today the effective party leader is elected by the parliamentary party through a secret ballot. However, this method of election relies entirely on convention. There is no *de jure* recognition of a specific election of party leader in the statutes of Fianna Fáil.⁶² Partially this oddity can be explained by the authoritative heritage of Mr de Valera's leadership from the foundation of the party in 1926 to 1959. After Mr de Valera, Mr Sean Lemass became leader by virtue of being the 'crown prince', but when Mr Lemass retired in 1966, the party had to decide on how to *de facto* elect its leader.

"The vote was confined to deputies: senators were excluded on the grounds that the party was effectively electing a Taoiseach and that this was a matter for the Dáil alone.".⁶³

A major function of the parliamentary party has been to provide support for its leadership and, when necessary, select a new leader.⁶⁴ Until the resignation of Mr Lemass the leadership rested entirely with the founding generation.⁶⁵ There is also a party president in Fianna Fáil, elected by the national congress, which largely is an honorary position which (without

⁶⁰ Thus also Farrell, based on the Constitution of Fianna Fáil 1983 and Fianna Fáil annual accounts, concludes there are no prescribed rules for this election. See the party organigram on p. 412 and table VII.D.2a.c on p. 422 in idem 1992. For this study we also examined an undated Constitution of Fianna Fáil obtained from the party bureau in 1993 (1995).

⁶¹ Garvin 1981, p. 121.

⁶² See Marsh 1993, pp. 300-301 and Katz & Mair 1992 (the entry on Ireland, Fianna Fáil).

⁶³ Marsh 1993, p. 300 (Marsh also makes further references to Walsh 1986).

⁶⁴ Carty 1988, p. 232.

⁶⁵ Ibid.

exception) has been held by the party leader.⁶⁶ The political history of Fianna Fáil provides several significant facts about party leadership. There are prominent examples of ousted leaders as well as of leaders who have been able to stay in power because of the particular (lack of) institutional arrangements. There have, on several occasions, been secret ballots in the parliamentary party on the party leadership (which for the moment is the rule - by custom). One intriguing incident followed from the ousting of Mr Lynch in 1979, when Mr Haughey won over Mr Colley (Lynch's deputy prime minister) with the narrow margin of 44 votes to 38.⁶⁷ Mr Lynch is the only prime minister who was explicitly forced to resign because of intra-party pressure. The absence of formalised procedures of party leader selection also provides a rare but distinctive example of how that particular situation can be turned to the incumbent leader's advantage. Extraordinary pressure was put on Mr Haughey during the events of 1982 when 22 TDs in a vote expressed a no-confidence in him. Subsequently he successfully managed to stay in office, skilfully using the element of time and direct appeals to the party members to his advantage.⁶⁸ In the words of Marsh:

"The whole episode is a testament to the difficulty of removing a leader that does not want to go, particularly in the absence of established reselection procedures.".⁶⁹

4.4.1.4 The Irish Fine Gael Party

Fine Gael has constantly been the second largest party in the Irish post-war parliament. Between 1948 and 1987 it held an average of 50 seats in parliament (Fianna Fáil's equivalent was 74 seats⁷⁰). On five occasions during the post-1945 period, all of which have been coalitions,⁷¹ the premier's political abode has been Fine Gael. As with Fianna Fáil, the Fine

⁶⁶ See Farrell 1992, p. 422.

⁶⁷ Carty 1988, p. 233.

⁶⁸ Ibid., p. 303. For a thorough review of the events of 1982-1983, see Smith 1983 and Marsh 1993, pp. 302-303.

⁶⁹ Ibid.

⁷⁰ Calculated from the information in ibid., p. 236.

⁷¹ See, e.g., the table in O'Leary 1991, p. 134.

Gael party has experienced forceful and long-lasting leadership. Only four Fine Gael leaders have been prime ministers on the six occasions the office has been in the hands of the party. As an exception to the rule, there was a divided leadership under Mr Mulcahy who, because of his background as an military officer, was seen as unsuitable for the office of prime minister and appointed Mr Costello prime minister during his party leadership.⁷²

As a result of strong leadership, the leadership selection process has been unproblematic and rather undocumented. As in Fianna Fáil the leader is selected by the parliamentary party and from amongst its members. However, contrary to Fianna Fáil, Fine Gael has short but precise rules for the election of its leader. Specific rules were introduced as late as 1978 by Mr Garret FitzGerald, who became leader after disastrous election results in 1977 and set about a modernization of the party. A particular characteristic in comparison with other party statutes is that the occasions for Fine Gael's party leader selection only is *negatively* defined. Strictly, the present statutes do not define any regular occasion on which leadership reviews *should* take place, only after political failures do institutional checks occur. Paragraph 52 (ii) of the *Fine Gael Constitution and Rules* prescribes that "*All members of the Parliamentary Party shall be entitled to vote... by the alternative vote system ... be by secret ballot.*".⁷³ The selection is carried out by proportional representation and the parliamentary party is interpreted in a broad sense, *including* members of both the Dáil and the Seanad as well as MEPs. Also these procedures differ from the practice of Fianna Fáil (compare Fianna Fáil above, "... a matter for the Dáil alone").

The Fine Gael statutes prescribe other important institutional features that are absent in Fianna Fáil practice. If the party after a general election does not join the process of government formation, the leader must submit himself/herself to a vote of confidence in the parliamentary party by secret ballot within two months.⁷⁴ If the leader fails to secure a majority he/she must resign. The same paragraph prescribes another significant feature: whenever the leader resigns, dies, or, in the opinion of the parliamentary party (presumably still interpreted in the same broad sense), becomes 'permanently incapacitated', there must be an election of a successor

⁷² Costello was prime minister twice, 1948-1951 and 1954-1957.

⁷³ Fine Gael Constitution and Rules with Amendments 1987, p. 33.

⁷⁴ Ibid., paragraph 52 (iii).

within one month (minimum time: one week). This codified practice could at times prove a comparative disadvantage for the incumbent leader. Such procedures would have secured a formal leadership review during the events around Taoiseach Haughey 1982-1983⁷⁵ (mentioned above in the section on Fianna Fáil). There are also examples in Fine Gael of party leaders who have been overtly overthrown. In 1990 Alan Dukes was forced to resign and he was thus described as "*the first party leader in Ireland to be overtly removed.*".⁷⁶ His opponents threatened to put down a motion of no confidence and, as with Fianna Fáil's Haughey, Dukes tried to secure the support of the public rather than that of the parliamentary party, though unsuccessfully (a formal vote of no confidence was never needed).

4.4.2 The Nordic Block: Procedures in Sweden and Denmark

Only eight persons have been prime ministers in Sweden since World War II. These eight incumbents have governed a total of 23 cabinets (1996). Three incumbents account for a stunning 48 years in office. If Mr Per Albin Hansson is included in the calculations, the average tenure of a SAP leader has been 17 years in comparison with the Moderate Unity Party's eight years during the post-1945 period.⁷⁷ The existence of 'implicit majority cabinets' has been a very Swedish feature. The Social Democratic minority governments have been able to govern with the consent of, e.g., the Communists. Denmark, on the other hand, has been governed by explicit minority cabinets that have had to gather support from different parties for different issues. Denmark has since 1945 experienced 24 cabinets [1996].

⁷⁵ Especially in January 1983, for details see Smith 1983.

⁷⁶ Marsh 1993, p. 306.

⁷⁷ SAP's average leadership tenure excluding Hansson is 16 years.

4.4.2.1 The Swedish Moderate Unity Party

The Moderate Unity Party (*Moderata Samlingspartiet*) has been the predominant Swedish party on the right. The party was in constant opposition during the long post-war hegemony of the Social Democrats. It was not until 1976 that the party joined the cabinet during the 1976-1982 centre-right rule. In October 1991 the party had its first prime minister with the cabinet of Mr Carl Bildt (1991-1994).

The party leader of the Moderates is elected by the national congress ('*partistämman*'), which, from 1969 is held the year before general elections.⁷⁸ Thus, the length of the mandate is four years for a Moderate party leader. The mandate was extended by one year in accordance with the extension of the parliament's mandate, which until January 1995 was three years. Paragraph 11 (i) of the party statutes explicitly states that the national congress elects a party leader, who is in charge until the next *regular* national congress.⁷⁹ The statutes prescribe neither a method of election nor a special electoral college, which leaves any nominees to be elected by the majority of the party congress. The national leader of the Moderate Unity party is usually the leader of the parliamentary party, although formally he/she need not be a member of parliament. The duties were divided when Mr Ulf Adelsohn was elected party leader by the congress although he was not, at the time, a member of parliament.⁸⁰ The common procedure of the Moderates has been that the national congress selects a national leader, who is afterwards elected leader of the parliamentary party.⁸¹ After the cabinet formation in the autumn of 1991, duties within the parliamentary party were divided between a leader of the parliamentary party and a leader of the parliamentary party executive ('*förtroenderådet*'). The national party leader is the leader of the latter body. A division was necessary as the present Swedish Instrument of Government does not allow members of cabinet simultaneously to be members of parliament.

⁷⁸ Albinsson 1986, pp. 110-111.

⁷⁹ Stadgar för Moderata Samlingspartiet 1988-, p. 9. The vote is by secret ballot (*ibid.*, p. 8) involving the 200 delegates of the congress (*ibid.*, p. 6).

⁸⁰ *Ibid.*, p. 101.

⁸¹ Gustafsson 1980, p. 138.

The Moderate Unity party provides examples of leaders who have been ousted by the party. In 1965 Gunnar Heckscher was persuaded to leave the office by the other members of the National Executive because of lack of confidence.⁸² In 1970 the incumbent leader, Mr Yngve Holmberg, involuntarily had to leave office through more regular means: he lost a party leadership election.⁸³

4.4.2.2 The Swedish Social Democratic Labour Party

The Swedish Social Democratic Labour Party (*Socialdemokratiska Arbetarepartiet*, often abbreviated SAP) has been the predominant party in the political history of Sweden, even before World War II (see table five). The statutes and traditions of SAP prescribe that the party leadership is focused on one person. There have seldom been separate leaders of the party organization, which is usual in Scandinavia. The leader of the national party has also been the leader of the parliamentary party. Thus, the party leader has been prime minister, leader of national party and leader of the parliamentary party when SAP has been in government.

The procedural similarities with the Moderate Unity Party are far-reaching. The highest decision-making body of the party is the party congress ('*partikongressen*'). According to the party rules the leader is selected at and by the party congress, which has been held every three years, and from 1995 onwards every fourth year (exactly as with the Moderate Unity Party). The party leader is always formally selected for a new period at the congress, even if there were ~~be~~ no other candidates.⁸⁴ According to the party statutes there are no prescribed means by which an incumbent leader can be removed against his/her will between the party congresses. This picture was confirmed in interviews with Mr Enn Kokk, Secretary of Nordic Affairs of SAP, and Mr Sten Carlsson, member of the party executive.⁸⁵ Mr Kokk affirmed

L. L

⁸² Albinsson 1986, pp. 85-90.

⁸³ Ibid., pp. 90-97.

⁸⁴ Interview with Enn Kokk (SAPs Secretary for Nordic Affairs, April 28th 1993).

⁸⁵ Interviews with Enn Kokk, Stockholm, April 28th 1993 and Sten Carlsson, Stockholm, May 9th 1993.

there are no formal means of ousting a party leader between regular party congresses, even though a theoretical possibility is embedded in the clauses that enable a summoning of an extra party congress.⁸⁶

The regular party congress is always arranged the year before a general election.⁸⁷ Party leader selections of SAP have been exceptional in two ways. First, there have been only four changes in the office since World War II, two of which have taken place under very exceptional circumstances. In 1946 Mr Tage Erlander became party leader, and prime minister, when the incumbent leader, Mr Per Albin Hansson, suddenly died. The next party leader election was 23 years later when Mr Olof Palme was elected. The third change in the office took place on March 1st 1986, when Mr Ingvar Carlsson became party leader after the assassination of Mr Palme.⁸⁸ In March 1996 the Finance Minister Mr Göran Persson replaced Mr Ingvar Carlsson as premier, eight months after the latter had announced his decision to resign for personal reasons. Two days earlier, on March 15, Mr Persson was selected leader of the SAP in an uncontested leadership election.

The second exceptionality is that Mr Carlsson was, like Mr Erlander in 1946, elected by the parliamentary party. Both were later formally elected to the office by the next party congress. The only occasion on which the congress *de facto* has elected a party leader was the election of Mr Palme in 1969.⁸⁹ On all three occasions the party was in government (one-party cabinets), which meant the party leader became the prime minister of Sweden.

⁸⁶ An extra party congress may deal only with issues that it has been summoned for (4:2 of the party statutes).

⁸⁷ Back & Berglund 1978, p. 70.

⁸⁸ After the assassination of Palme, the VU (the national executive) was summoned and proposed to the party executive that Mr Ingvar Carlsson would become (temporary) party leader. This decision was later confirmed by the next party congress (interviews with Enn Kokk, April 1993, and Sten Carlsson, May 1993).

⁸⁹ Gustafsson 1980, p. 139. According to Gustafsson no other body of the party had dealt with the issue in 1969.

Another factor that has contributed to a strong leadership position (i.e. only a few long-time leaders) in the party is that the Swedish Social Democrats have no tradition of a vice-party leader of the party, nor a separate leader of the parliamentary party.⁹⁰

4.4.2.3 The Danish Conservative People's Party

The Danish Conservative People's party (*Det konservative folkeparti*) was in government on only two occasions between 1945-1982 (1950-1953 and 1968-1971), but from 1982 it was the party of the prime minister until January 1993 (under prime minister Poul Schlüter). The party structure between the Danish parties varies to a higher degree than between the two Swedish parties. There are two central party bodies within the Conservative party. The national conference ('*landsmödet*') meets on an annual basis and is the highest authority on policy. Apart from discussing the policy of the parliamentary party, it elects the party leader every year at the regular national conference.⁹¹ Again the single word *regular* suggests that all possible reviews of the leadership take place at the yearly conference. There are no other explicit regulations of the office of party leader in the party statutes. There are no clauses prescribing, for instance, that the party leader should be a member of parliament, nor is such a provision found in the statutes of the Danish Social Democratic party. As with the Danish Social Democrats, the party leader is only a normal member of the parliamentary executive. The parliamentary party has a separate chairman.

The second important party body is the national council ('*repräsentantskabet*'), which also meets annually and is the highest authority on organizational matters. The parliamentary party is a core institution. It does most of the preparatory work on policy and has a separate chairman.⁹² The party statutes mention the parliamentary party, but do not prescribe any procedures for elections etc. in the way its social democratic equivalent does.

⁹⁰ Usually party statutes prescribe that elections of the party leader and one or two vice-leaders be held, which was not the case with the SAP. The practice of the Swedish Social Democrats was confirmed in interviews with Enn Kokk (Secretary for Nordic Affairs) on April 28th 1993 and with Sten Carlsson (member of the party executive), May 9th 1993.

⁹¹ Love for det konservative folkeparti 1992, p. 5 (5:3). See also Katz & Mair 1992, p. 251.

⁹² Fitzmaurice 1980, p. 113.

4.4.2.4 The Danish Social Democratic Party

The Danish Social Democratic Party (*Socialdemokratiet*) has been the largest party in Danish post-1945 politics, and the political abode of a majority of the post-war prime ministers (see table five). The supreme body of the party is the congress, which is held at least every fourth year (the rules do not prevent a more frequent assembly of the congress, they only prescribe a minimum).⁹³ There is no mention in the party statutes of a particular time at which the conference should be arranged, which can be compared to the Swedish SAP with conferences specifically held the year before general elections. The congress elects the party leader, the *formand*, and two vice-leaders. If the party leadership is contested, the election is by secret ballot. Otherwise it is a formality on the congress agenda (among the leader and the vice-leaders both sexes must be represented).⁹⁴ There is also a smaller annual conference in September each year ('*landsmöde*'), to which the party leader must submit a report. The leader of the party is not himself/herself (as in Sweden) the leader of the parliamentary party, but *ex officio* a member of the *bestyrelse*, the parliamentary executive (the party leader and the chairman ('*ordförer*') represent the parliamentary party in debates and negotiations).⁹⁵ The size of the executive is not defined in the party statutes,⁹⁶ but consists of about ten persons.⁹⁷

⁹³ Love for Socialdemokratiet 1992, p. 22 (paragraph 14, subsection 1).

⁹⁴ Ibid., p. 24 (st. 10).

⁹⁵ Fitzmaurice 1981, pp. 58-59.

⁹⁶ Love for Socialdemokratiet, pp. 34-35 ("Socialdemokratiets gruppe i Folketinget").

⁹⁷ Fitzmaurice 1981, p. 58.

4.5 The Party Leadership Contract Compared

The party leadership contract constitutes the formal relationship between the party and its effective leader.⁹⁸ The foundations of the concept were laid out in figure 8. This part of the study attempts to define the contracts and account for how variations in the contract affects the office of prime minister. The way the party leaders are selected to the post constitutes the most important element of the contract. The party leader elections will not be described party by party; instead the process will be dissected into key elements. The electorate at party leader elections is one such element that evidently can take on a variety of forms. Four electorate sizes can be identified in the eight parties, which, at the same time, imply different methods of party leader election.

4.5.1 The Party Leadership Electorate

The *first* and most unregulated way of election (or selection) is not to have a defined electorate. A party leader emerges as a result of bargaining within the party élite. This form of party leader selection was practised by the British Conservative party until 1965. This 'customary process of consultation'⁹⁹ has been widely practised in Westminster systems, where the parties have identified with their parliamentary parties and formal elections generally have been considered a threat to party unity.¹⁰⁰ The pragmatic approach to party leader elections in the Irish Fianna Fáil and Fine Gael parties also points to a blurred borderline between informal negotiations and selection within the parliamentary party. As of today [1996] there is no *de jure* recognition of party leadership elections in Fianna Fáil. In Fine Gael procedures for election were recognised only as late as in 1978.

The *second* model of party leader selection is to be elected by the parliamentary party. However, even the concept of parliamentary party can be stretched. Two models can be identified among the eight parties:

⁹⁸ Cp. Strom 1993.

⁹⁹ Punnett 1993, p. 236.

¹⁰⁰ See, e.g., Marsh 1993, p. 313.

- 1) a parliamentary party comprising only members of the lower house
(example: Irish Fianna Fáil), or
- 2) a parliamentary party comprising members of both houses and MEPs
(example: Irish Fine Gael).

The British Conservatives and both Irish parties leave the selection of the leadership to their parliamentary parties (as in alternative one above), which has been the norm in cabinet systems. This electorate was formerly used by the British Labour Party (until 1981), but was abandoned, as it was seen to vest too much power in the parliamentary party.¹⁰¹ To be elected by the parliamentary party implies that the parliamentary party is the party body that is able to unseat the leader, an aspect which will be returned to later. The *third* model is to be elected by a party conference and/or a specially summoned leadership convention. To be elected by the party conference or congress (the name varies) is the dominant form of party leadership election in Scandinavia, including the Swedish Social Democratic Party and the Moderate Unity Party, in fact all parties in the Swedish *Riksdag*, as well as the main Danish parties.

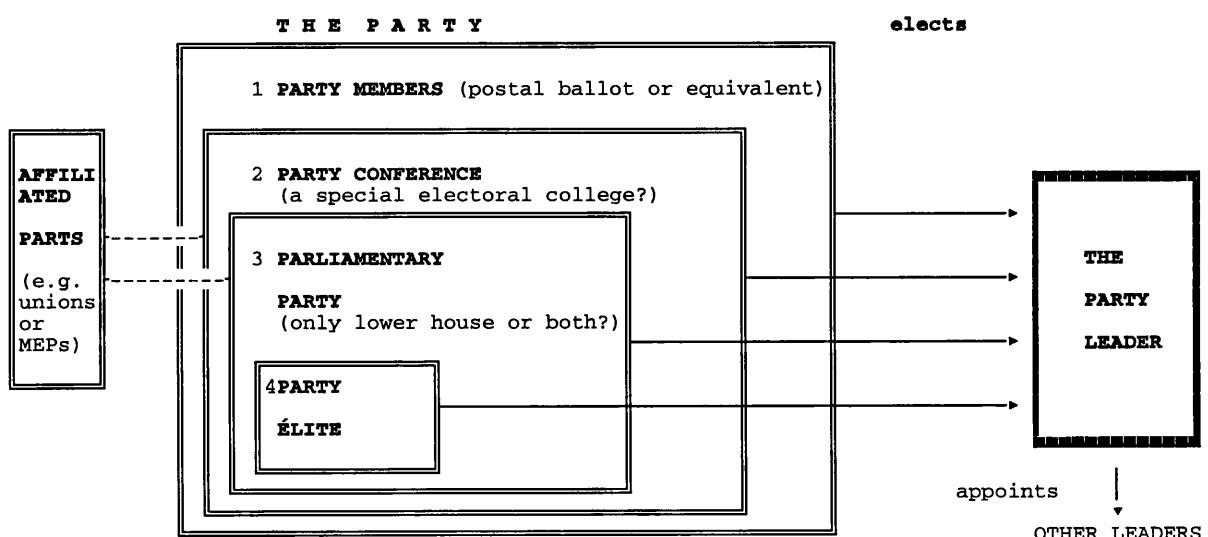
The *fourth* way is to be elected directly by the party membership through a postal ballot. Since 1993 the votes of the party membership form a part of British Labour's leadership election (1/3, the other two components being the PLP and the affiliated organizations, the method is also used by the UK Liberal Democrats). Labour's practice shows that even larger 'aggregate electorates' than the party membership exist. In theory there are even broader possibilities, for instance open primaries as in the USA. The direct implication for this study is that elections directly by party members decrease the vulnerability of the leader. If the party leader is elected directly by a majority of the party members, the possibilities of being rapidly ousted by, for instance, the parliamentary party would be close to non-existent. If the party élite (e.g. the cabinet in Britain) is dissatisfied with its leader, the leader still has the possibility of, legitimately, addressing the whole party membership directly, so to say 'over the head of the smaller bodies of the party'. Fine Gael's leader has to submit himself/herself

¹⁰¹ The powerful position enjoyed by a leader elected by the parliamentary party was a main argument against that form of election in the British Labour party. See Punnett 1993 and Marsh 1993.

to a vote of confidence in the parliamentary party if the party does not join the process of cabinet formation. In the Nordic cases, particularly in the two Swedish parties, it can be difficult to change the leader even when in opposition (with regular party conferences the year before general elections). Fianna Fáil's leader Haughey skilfully used the two elements of time and direct appeals to his advantage in 1982, when he managed to stay in office, despite a vote of no confidence against him.

Figure 9. THE ELECTORATE AT PARTY LEADER ELECTIONS

Four alternative sizes



4.5.2 The Question of One or Several Party Leaders

A fundamental difference in the leadership structure can be distinguished when the four Nordic parties are compared with the British and Irish parties. The national leader is *the* leader of the party in Sweden and Denmark, whereas the opposite is the case in Britain and Ireland - where the leader of the parliamentary party is the effective leader of the whole party (and appoints the extra-parliamentary leader). In Sweden there is a strong tradition of having one person in charge, leading both the parliamentary and the national party. When the Swedish Social Democratic Party has been in government, its leader has been prime minister and the leader of the parliamentary party, although since 1971 members of the cabinet are not allowed to be members of parliament at the same time. The Moderate Unity party has solved this dilemma by making the national party leader the leader of the parliamentary party executive, (and having a separate leader of the parliamentary party). In Denmark the tradition is to have a separate leader of the parliamentary party. Accordingly there is a distinct difference in the practice of the two Swedish and Danish parties, between concentrating party power or dispersing it as a form of consensual checks and balances.

The Swedish one-leader practice leads to another question: If the parliamentary and the national party arrange leadership elections on different occasions, which election determines the effective party leadership? In Sweden the national leader should also be elected leader of the parliamentary party, but if the parliamentary party elects its leader before a national party leader election, there is a potential conflict. Despite a one-leader practice, the statutes of the four Scandinavian parties do not prescribe that a new leader of the national party, or the parliamentary party, should automatically become the leader of the other body. The question is not theoretical: in Sweden the parliamentary parties have played a key role on several occasions, in both the Social Democratic and the Moderate Unity Party.¹⁰²

¹⁰² Gustafsson 1980, pp. 138-139; Albinsson 1986, p. 97.

This very same party leader hierarchy was unquestioned in Britain until the 1960s-1970s. In the British Conservative Party the party leadership and the national premiership were so intertwined before the 1960s that there was an overall party leader only when the party was in government. In opposition, a new party leader would "*merely be a leader in the Commons*" and acquire a full party leadership status only when the party returned to office.¹⁰³ The legal recognition of an overall party leader in the statutes of the Conservative and Labour parties came as late as 1965 (Conservatives) and 1978 (Labour). Potential ambiguities and cross-interests of plural leadership offices have been minimal. Punnett concludes that the features of the Westminster model have contributed to "*... the otherwise surprising failure of the extra-parliamentary post of 'chairman' or 'president' to develop as a serious rival to the parliamentary leader in the British parties.*"¹⁰⁴

The party leadership in Ireland is as unambiguously personified in one sole leader as in Britain: "*He is the electoral figurehead, the candidate for Taoiseach [prime minister], the leader of the deputies in parliament, and the head of the extra-parliamentary organisation.*"¹⁰⁵ In Fianna Fáil a new parliamentary party leader is, by tradition, elected president of the party at the next annual party conference. Both Fianna Fáil and Fine Gael mention dual leadership in their party statutes, but only in Fine Gael has a dual leadership occasionally existed, even to the extent of creating some organizational disorientation in the party.¹⁰⁶ Even true dual leadership is possible - it was practised by the Danish Conservatives in the 1950's. Generally the concept of party leader is more complex than it seems at a first glance. The terminology used in the party statutes varies from party to party and is at times overlapping and confusing. There are often both party chairmen, party leaders and/or party presidents mentioned in the statutes. Only seldom, however, does formal dual leadership translate into a conflict.

¹⁰³ Punnett 1993, pp. 234-235.

¹⁰⁴ Ibid., p. 260.

¹⁰⁵ Marsh 1993, p. 296.

¹⁰⁶ Fine Gael Constitution and Rules; Marsh 1993.

Table 7. THE TOP JOBS IN THE PARTIES

Party structure as an indicator of different systems.

| | U K | | I R E | | S W E | | D E N | |
|---|---|--|--|--|--|------------------------------------|--|---|
| | Conserv. | Labour | Fianna F. | Fine Gael | Soc.Dem. | Mod.Unity | Soc.Dem. | Conserv. |
| 1. The leader of the national party organization: | secondary leader/ chosen by 2. below 'party chairman' | secondary separate leader: 'General Secr.' | effective leader/ possible premier, see also below | secondary separate leader: 'General Secr.' | effective leader/ possible premier | effective leader/ possible premier | effective leader/ possible premier | effective leader/ possible premier |
| 2. The leader of the parliamentary party: | effective leader/ possible premier | effective leader/ possible premier | same as 1. above (no vice leaders specified) | effective leader/ possible premier = party president | exists only in practice, secondary leader = premier? | separate secondary leader | exists, (may be the national leader) | exists only in practice (not even mentioned in rules) |
| 3. Other important leadership offices in the party? | the deputy chairman | deputy party leader, NEC chairman | National* Executive President | National* Executive President | no vice leaders, one party secretary | 2 vice chairmen of the party | 1 political vice chairman, 1 organizational vice ch. | 3 vice chairmen |

* - Elected by the respective party conference (ard fheis)

4.5.3 The Method of Election

The method of election *per se* seems important only in Britain, perhaps with party size being a decisive determinant. Of the eight parties, only the two British use complicated methods of selection, codified in the party rules. Fine Gael's Constitution in one sentence mentions the use of the alternative vote system. Scandinavian party rules do not prescribe a method, only the occasion when the election is to be held. In Ireland another difference can be noted: Fianna Fáil's voting figures are public, whereas they remain a secret in Fine Gael. The only rationale for choosing not to disclose the figures is that it is a means of trying to maximise the picture of party unity. However, it has been concluded there is no clear evidence of such an effect in Ireland.¹⁰⁷

¹⁰⁷ Marsh 1993, p. 314.

The only party to make a distinction between being in opposition versus in government is the British Labour Party. When in office Labour arranges elections only if there is an outright request for it.¹⁰⁸ Considering the significance of this distinction, especially in Westminster systems, it is noteworthy that only Labour emphasises the contrast between government and opposition. To explicitly measure the popularity of the Labour leader will therefore prove substantially more difficult than in the Conservative party - when the party leader is prime minister (compare the challenges to Mrs Thatcher and the events around premier Major in 1995).

4.6 Assessing the Leadership: An Autonomous or Dependent Party Leader?

This chapter seeks to produce an assessment of the leadership contract with the help of essential institutional determinants. Within the framework of this chapter it is impossible to go into specific circumstances of and reasons for the dismissal of party leaders, it will point only to the extent to which such events are likely to occur, based on analysis of post-1945 events.

The beginning of this chapter referred to the importance of assessing the party leader's position, because the different combinations of party and national leadership might prove to be cocktails that provide different positions for taking hard decisions and face unpopularity in the party and nationally. The chapter introduction posed the crucial question of whether the strength or weakness of the premiership, at least partially, can be traced back to the position of party leader? However, the assessment of the party leader's 'vulnerability' (a term preferred by Weller¹⁰⁹) is complicated. Tenure is too general an indicator. One can think of a political system in which the prime minister is vulnerable, but has never been dismissed - particularly because of awareness of such a possible challenge. The opposite, equally realistic scenario could occur where the prime minister is relatively invulnerable, but in which sudden intra-party coups succeed because of the premier's false sense of security.¹¹⁰

¹⁰⁸ The Labour Party Rule Book 1993-1994, section 5; Punnett 1990, pp. 182-183.

¹⁰⁹ Idem 1983, 1985.

¹¹⁰ See also Weller 1994.

The questions posed above can be addressed in a more scientific way by undertaking a comparison of the extent to which the party leader enjoys institutional autonomy or dependency vis-à-vis the party. If one assumes the degree of autonomy can be assessed, it implies that the concept of autonomy is a good substitute for the abstraction of 'the party leader's power'. To be able to assess the impact of party-internal politics comparatively, one has to have a typology that creates a common framework for the assessment. Any indicator must be distinctive to the degree which lets it measure the same matters in different parties and even across systems. This chapter section addresses some more specific key questions and evaluates whether they contribute to a more or less autonomous party leadership. The experiment is based on the two following presumptions:

- 1) The study follows the premises stated in 4.3.1 on the importance of the linkage between party leadership selection and the office of prime minister. The party leader selection is of primary importance for assessing the autonomy of the party leadership.
- 2) In creating determinants, the study is exclusively interested in aspects of the party leadership's vulnerability, since the ultimate interest is in the office of prime minister. Hence, it is assumed the party leader is the prime minister.

This experiment will focus on the procedures of appointment and potential dismissal in accordance with the earlier conclusions of this chapter.

4.6.1 Composition and Size of the Electorate

Party rulebooks seem preoccupied with the occasion when selection takes place, not with the population that selects the leader. A lesson learned is that being elected *at* a party conference does not necessarily imply that one is elected *by* the party conference. The selection of a party leader may be performed by a specially summoned electoral college consisting of just conference delegates and/or MPs, or it might even involve other bodies and organizations affiliated with the party (as with the British Labour party). There are two main reasons for taking into account the composition and size of the electorate. The larger the electorate, the more difficult it is to call them together, and the fewer are the summonings, *ergo* the less vulnerable is the incumbent. The matter of summoning the electorate is however of secondary importance. More important is the general principle that prevents a smaller body from overthrowing a decision made by a larger and more important body within the same organization.¹¹¹ This principle leads to another pertinent question: Can a certain body or group within the party exert an disproportional influence? This need not be only *within* the party. To use King's expression, there can be disjunctions between national electoral processes and internal party processes.¹¹² In the most obvious case from this study, British Labour, the role of the unions has declined under the new rules of 1993. Nevertheless, possible disjunctions have to be explored comparatively.¹¹³ In many European systems similar situations are rather unthinkable, especially if the position of the premier constitutionally is strong (compare the German *Kanzlerprinzip*).

¹¹¹ Compare the line of thought in Weller 1983 and 1985.

¹¹² King 1991, p. 27.

¹¹³ Table criteria: A value of 2 is assigned to a electorate that corresponds to selection of the party leader by the largest body of a party, the party congress or its equivalent, or a large special electoral college (like that of British Labour between 1981-1993, which is active *at* the party congress). Selection by the parliamentary party receives the minimum score of 0. It is difficult to imagine any body more flexible and potentially more informed and alert against the incumbent leader than the parliamentary party. The total absence of party leader election rules, as with Fianna Fail, is assigned the intermediate value of 1 (as the lack of procedures has had the effect of helping the incumbent to stay in power).

4.6.2 Leadership Tenure

If several, or all, parties in a political system elect their effective leaders at the party conference, the time interval between the party conferences transforms into a crucial determinant of the leader's status. This argument is especially valid when the party statutes prescribe that the party leader has to be elected at *regular* party conferences, which is explicitly so with the Swedish Moderate Unity party (implicitly also with the Social Democrats). This one word in the rulebooks gives the party leader a substantial advantage in securing the incumbency. In addition, both Swedish parties arrange their conferences only the year before the constitutionally fixed general elections. General elections to the *Riksdag* are from the present parliament to be held every four years (it was every three years until January 1995), irrespective of any other general elections in between this fixed interval. Accordingly, the crucial party conferences are be held only every fourth year. From this tenure-focusing perspective, there is a major difference between the two Danish parties. The Danish Social Democrats arrange party congresses every fourth year (the mandate of the Danish parliament is also four years), whereas the rules of the Danish Conservative People's Party prescribe a national conference, with leadership elections, to be held every year.

What is then a sufficient period of time between party leader elections to allow the prime minister to regard the party leadership as a secondary duty?

*"In any leader-selection system a balance has to be struck between permitting contests only at fixed and infrequent intervals and allowing contests to be initiated at any time on the whim of an eccentric minority."*¹¹⁴

A general distinction can be made; based on the eight parties in this study, leadership elections tend to be either *annual* or of *once-a-parliament*-character. There are several obvious links to the parliamentary cycle; none of the parties allows its leader a tenure longer than the mandate of the parliament. The British Conservative Party and Irish Fine Gael make leadership challenges possible after the opening of every parliamentary session. Even though such annual reviews minimise the risk of a challenge at other times, they must generally be seen as

¹¹⁴ Punnett 1990, p. 191.

negative for the party leader.¹¹⁵ If contested, in other words when a vote is arranged, it is a dividing and costly party-internal process. If there are no yearly (or more frequent) leadership reviews, the peak of unpopularity must coincide with the time for a regular leadership review, for example, every fourth year in Sweden. The longevity of party leaders in Sweden, notably Social Democratic leaders, and thus prime ministers, as well as long-time leadership of the Danish Conservatives is partially ~~be~~ explained by this institutional determinant. The position of the Swedish Social Democratic and Moderate Unity Party leaders is secure because of two intertwined factors: the long tenure and the connection between general elections and party leader elections. The latter factor is important for several reasons. If the party elects its leader at a conference the year before general elections, the party conference also forms the start of the election campaign. It seems unlikely a party is willing to make changes in the leadership at such a time, especially if the party is in government. Any change on such an occasion is likely to be of a consensual character (which has been the case). It also means the party does not have the institutional means immediately to turn down a leader who lost a general election campaign, which is possible with rules like that of Irish Fine Gael.¹¹⁶

4.6.3 Requirements for a Formal Challenger

Is a formal challenger needed for arranging a vote on the party leadership? Particularly in Westminster systems this question becomes decisive. Provisions for a formal challenger have several possible effects on the position of the party leadership. A *formal* need to present a challenger significantly secures the position of the incumbent. The political costs for a prominent party member (likely to be a cabinet member when the party is in government) to stand as an official challenger are very high. The deselection of a party leader who occupies

¹¹⁵ Leaders of, e.g., major Australian parties may be challenged at any time; see Weller 1983, pp. 112-114.

¹¹⁶ Table criteria: A value of 2 is assigned for any regular tenure of leadership which is longer than one calendar year. According to earlier conclusions in this paper, party leader elections tend to be annual or of once-a-parliament-character. Thus the general dividing line is between a tenure of one year or more than a year. A one-year tenure is assigned a value of 1 and a tenure reviewed more often than annually (or a constant review) would be assigned a value of 0. An uncodified situation, as with Fianna Fail, is again assigned the intermediate value of 1.

the premiership is likely to divide not only the party organization but also the government. In systems with strict collective accountability, it might imply political suicide for the cabinet. Hence, the threshold for mounting a coup is significantly high if a formal challenger has to be nominated. The formal need for a challenger can prevent a direct vote on the leadership, which even without a defeat might be a Pyrrhic victory which contributes to party-internal instability. Functionally, a formal challenge can serve two purposes:

- 1) it can be only a means of showing, and measuring, discontent, or
- 2) it can be a serious attempt to overthrow the leader.

In reality the former usually precedes the latter. A recent example in British political history is Sir Anthony Meyer's challenge to Thatcher at the party conference in 1989. Nevertheless, stalking horses are more likely to occur in large parties (with a considerable backbench), and the political costs of a challenge are high under all circumstances. The Irish prime minister/party leader Haughey did his best to cut off the political careers of the oppositional forces that unsuccessfully tried to oust him in 1982-1983.

Two further factors are also connected with the nomination of formal challengers. The first is the nomination deadline (i.e. the 'surprise element', which is dealt with later). Second, if new candidates can be nominated *during* the election process (e.g. for a second round, as with the British Conservatives and, particularly, the 1990 deselection of Thatcher), it adds a whole new dimension of tactics to the election. A chance to enter the race at a later stage makes challenge a more potent institutional tool because both main purposes accounted for above can be used as an effective combination. First a 'dummy challenger' with a low likelihood of succeeding can test the ground, and later the challenge can be followed by a more compromise-oriented candidate with greater chances of success. Candidate nominations and deadlines are closely connected to other determinants, particularly the composition and size of the electorate. Similarly a combination of a short tenure and no requirements for a formal challenger might circumscribe the incumbent's potential.¹¹⁷

¹¹⁷ Table criteria: A short tenure in office combined with no requirements for formal challengers together contribute to destabilise the leadership. If i) there is a requirement for formal candidates and ii) it is subject to specific conditions, like 'at a specific time before the conference only' or 'by a certain number of MPs only', a value of 2 is assigned. A

4.6.4 Does Government Participation Yield Procedural Benefits?

Do the party rules favour a government position to being in opposition? After all, participating in or even leading the government is the highest reward a party leader can provide, i.e. in government party-internal matters should be of secondary importance. Theoretically this question has two sides. On the one hand, the obvious advantages of the premiership could be an incentive for the party to include restrictions on its leader in the leadership contract to ensure accountability to the party. On the other hand, it is generally understandable that leadership contests and other party-internal affairs are of secondary importance when the party is in office, especially if the party is a partner in a coalition with all the inter-party strains that imposes (a frequent experience in Denmark). Therefore there is a rationale for the parties to make a procedural distinction between being in office and in opposition (though only one amongst these eight parties does so). The reasons for the British Labour party to make a distinction in its rules between government and opposition refers less to difficult experiences in government and more to divisions in the party in the 1970s-1980s, which potentially could have harmed the cabinet's work through the mounting of leadership challenges as a general means of expressing discontent. Once again it is evident how intertwined these institutional determinants are. If leadership challenges are facilitated only every fourth year, these occasions are meant to be a showdown.¹¹⁸

4.6.5 Are There Other Conjunctures for Party Leadership Reviews?

This study has so far been concerned with the regular rules and procedures for making a party leader. To what extent do these means matter? Are there no other institutional checks on the

value of 1 is assigned to party rules that require a formal challenger to be nominated, or any comparable 'threshold' process to be initiated for a vote to be arranged. A party that does not prescribe the need for a formal challenger for arranging reviews of the leadership is assigned a value of 0.

¹¹⁸ Table criteria: A party leader who is favoured unconditionally in the rules for being in government is assigned a value of 2. If there are less important advantages in the party rules, such as the party leader being freed from certain duties, a value of 1 is assigned. If the rules make no distinction between government and opposition status, or even make government status a burden in some sense, it corresponds to a value of 0. See also table 2 in the paper.

leader, which could end up with an ousting of the leader? It seems not to be the case, neither in the Westminster nor in the Nordic block. Weller offers an explanation, stating that

*"the mere existence of institutionalized, formal opportunities of party leader election presumably increases the difficulty of mounting pressure at any other time."*¹¹⁹

Based on the eight parties examined in this thesis, Weller's statement is credible. However, the absence of legally recognised election procedures is an enigma which often has been an advantage for the leader, as in Irish Fianna Fáil. The events surrounding Haughey in 1982-1983 showed that the absence of institutionalised formal opportunities of a review contributed to keeping him in office.¹²⁰ There is no clear case of an opposite situation: that the lack of formal rules would have helped to oust a leader. Weller's postulate can be restated by adding that the absence of institutionalised, formal opportunities of leader elections increases the difficulty of mounting pressure on the incumbent,¹²¹ and when institutionalised opportunities of leadership election exist, they increase the difficulty of mounting pressure at other occasions. The difficulty of mounting pressure at other than formally prescribed times is apparently greatest when formal leadership reviews are arranged neither too frequently nor too scarcely, which translates into annual reviews (there have been no departures from the yearly review procedures). However, the answer to the question above should not be taken entirely for granted. It is plausible that the party executive or the parliamentary party could be in possession of formal powers to dismiss the leader through a vote of no confidence (compare again with Australian party leaders). Another alternative would be an extra-curricular summoning of the party leadership electorate (which, at least, is feasible at an extra-curricular party conference). If such possibilities exist, even theoretically, it would alter the importance of the previous four determinants.¹²²

¹¹⁹ Weller 1983, p. 112.

¹²⁰ Marsh 1993, pp. 302-303; Smith 1983.

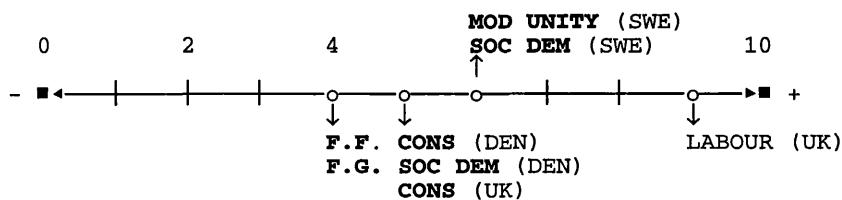
¹²¹ As opposed to institutional, formal opportunities to challenge the leader at any time, cp. the major Australian parties accounted for in Weller 1985.

¹²² Table criteria: If there are no other institutional means of ousting the leader than through regular/fixed leadership elections, the party is assigned a value of 2. If there are other means available than just leadership elections, but they are connected to certain preconditions, like the summoning of a party conference, a value of 1 is assigned. If there are other means than the regular leader elections that clearly allow a review of the

Table 8. THE PARTY LEADERSHIP CONTRACT: A CONCLUDING HEURISTIC

Five determinants of the party leader's position.

| chapter subsection | U K | | I R E | | S W E | | D E N | |
|--|-------------|-------------|------------------|-------------------|--------------|--------------|-------------|---------------|
| | Cons. | Labour | F.F. | F.G. | Mod. | Soc.Dem | Cons. | Soc.Dem |
| 4.6.1 The size of the leadership electorate: | small 0 | large 2 | small 0 | medium sized 1 | large 2 | large 2 | large 2 | large 2 |
| 4.6.2 Time elapsing between regular party leader election conjunctures: | 1 year 1 | 1 year 1 | n.a. (?) | 1 year 1 | 4 years 2 | 4 years 2 | 1 year 1 | 4 years 2 |
| 4.6.3 A formal challenger required to arrange vote on the leadership? | yes 2 | yes 2 | yes 1 | no 0 | no 0 | no 0 | no 0 | no 0 |
| 4.6.4 Is the leader favoured in the procedures by being in government? | no 0 | yes 2 | no 0 | no 0 | no 0 | no 0 | no 0 | no 0 |
| 4.6.5 Other conjunctures at which a leadership review can be facilitated? | no 2 | no 2 | n.a. (?) 2 | no 2 | no 2 | no 2 | no 2 | feasible 1 |
| | 5 | 9 | 4 | 4 | 6 | 6 | 5 | 5 |

Alternatively:**A WEAK CONTRACT**
(dependence)**A STRONG CONTRACT**
(autonomy)

leadership, or other institutional checks on it, a value of 0 is assigned.

4.7 The Party Leadership Contract: Towards Conclusions

The unidimensional continuum on the preceding page can never be a precise measure, but it helps to distinguish certain characteristics of the party leaders' contracts. First, the contracts generally appear to be strong. A 'total value' of 2-3, or less, would imply a clearly weak contract, where the weakness of the party leadership is significant and is likely to bear consequences on how the prime minister is able to pursue his/her goals. A striking feature is the national (and even cross-national) conformity of the position the party leaders enjoy in Sweden and Denmark. A British Labour leader also today enjoys an institutionally autonomous position (which is interesting to relate to the earlier debates on 'disjunctions between party-internal and national electoral processes'¹²³). Especially under the old rules, in force between 1981 and 1993, the Labour leader was seen as playing the game by the rules of the trade unions.¹²⁴ Today the position of the leader is strong, especially if he is also able to manage external factors like the relationship with the media. However, if a leader is elected by the party membership, as is (partially) the case in the Labour Party, it almost by definition implies that the person is capable of managing the relationship with the media.

Are both extremes of the continuum possible? A party leader who, for instance, is elected by a party conference for a period of several years, requires a formal challenge, benefits from the position in government and cannot be ousted at occasions other than the party conference (and, furthermore, has no restrictions on re-elections) enjoys a constellation of factors that add up to a very autonomous leadership. At the other end there is the possibility of a party leader who is elected by a small electorate (typically the parliamentary party), does not need to be formally challenged in advance, does not benefit particularly from being in government and could be ousted on several occasions (e.g. simply by a vote of no confidence of the parliamentary party, and, furthermore, faces few or no possibilities of re-election). This prime minister enjoys very limited autonomy.

¹²³ See, e.g., King 1991.

¹²⁴ Ibid.

The position of Swedish prime ministers from the Social Democratic or Conservative Parties is strong. The 'disadvantage' is that there are no formal requirements for challengers to arrange votes on the leadership, which means that the party conferences can, and probably are meant to, have the function of expressing the confidence in the leader. The party leader's relationship to the leadership electorate is paradoxical: a parliamentary party is potentially the most perilous electorate, but at the same time also the body over which the leader has the greatest possibilities to exert power. To look at the other side of the coin, a party conference is a less perilous electorate for the party leader, but also a body which can hardly be systematically influenced. If the party leader, as with the British Conservatives or the two Irish parties, is elected by the parliamentary party, the extent to which the party leader can influence the parliamentary party has to be examined. Weller dealt with this particular influence in his comparison of Westminster prime ministers.¹²⁵ However, the influence that a party leader may exert over his/her parliamentary party is to a large extent dependent on whether or not the party is in government (see 4.6.4). If the party is in government, especially if the party leader is the prime minister, the leader's grip is strong because of political appointments and other forms of political dividends (a strong hold over the parliamentary party is a general assumption). Extensive patronage contributes to explain long-time Fianna Fáil leaders, despite uncertain factors like the unregulated leader elections by the parliamentary party. The most important factor in determining whether unregulated selection is an advantage or a disadvantage for the party leader is the government/opposition-distinction. If an uncodified contract is an advantage for a prime minister, it is probably as big a disadvantage for a leader of the opposition. Alderman & Smith have argued that where no rules exist, prime ministers are hard to shift.¹²⁶ Mrs Thatcher is the only prime minister to be clearly deselected in a party leader election in any of the four nations since 1945. *Ergo*, even where rules exist, prime ministers are indeed hard to shift.

¹²⁵ Idem 1985.

¹²⁶ Alderman & Smith 1990, Weller 1994.

The fact that none of the eight parties circumscribes the number of times a leader can be re-elected is significant. This factor has generally not been accounted for.¹²⁷ However, in some parties a limitation of two or three periods in office sets the ultimate limits of a certain person's governance (a noted example is LDP in Japan). This factor could also have been a determinant in table five, but as none of the major parties imposes this kind of restriction it would not, in this case, have contributed to explaining the leader's position. With a limitation on re-election, long-time leadership, like that of Erlander in Sweden or Thatcher in Britain, would have been impossible. It could, on the other hand, cause the dilemma of 'lame duck-leadership' at the end of a leadership term which cannot be renewed. The party may find itself without a trustworthy alternative to a long-time leader. If the tenure of parliament is as long as five years (Britain and Ireland), and a review of the party leadership takes place on a yearly basis, such limitations on the leadership could be counterproductive to the party.

4.7.1 A Sudden Leadership Coup?

Crossman and others have anticipated that a sudden and unpredicted *coup* is the only realistic possibility to remove a party leader. This account has concerned Westminster systems, but seems to be relevant also for the four Nordic parties. It is evident that party leaders have a strong position within these eight parties, which favours Crossman's case. Consequently it is worth examining comparatively the possibilities of such a sudden coup within the party. To determine how sudden and unanticipated a leadership challenge can be, the different parties' deadlines for mounting a challenge is the crucial factor. First, when is the deadline for a leadership challenge, and, second, what conditions are formally attached to mounting a challenge?

¹²⁷ E.g. Weller 1983, 1985, 1994.

Table 9. TWO DETERMINANTS OF LEADERSHIP CHALLENGES

| | U K | | I R E | | S W E | | D E N | |
|--|----------------------------------|---------------------------------------|------------------|-------------------------------------|--------------------------|--------------------------|-----------------------------|-------------------------|
| | Cons. | Labour | F.F. | F.G. | Soc. Dem | Mod. | Soc. Dem. | Cons. |
| 1. The deadline for challenging the leader at a prescribed conjuncture | five days notice | two weeks before elect. starts | no defined rules | no defined rules (* one week) | at the event of election | at the event of election | the day before the election | at the party conference |
| 2. Rules/requirements attached to a formal challenge of the incumbent | written notice by 10% of the MPs | 20% of MPs, but 2/3 of MPs if in govt | no defined rules | * permanently incapacitated leader? | no defined rules | no defined rules | written notice only | no defined rules |

The institutional structure of leadership challenges differs between the Westminster and Nordic blocks. In a majoritarian system the office of party leader, theoretically, is under review yearly, but often has rules attached to it that may inhibit an actual vote. Labour's requirement for a two thirds majority works against a sudden coup. In the Nordic systems there are no (or only theoretical) possibilities of ousting the leader on occasions other than the formal leadership reviews at party conferences. However, once the opportunity is there, no formal restrictions seem to hinder a challenge. A generalization based on these eight parties is that the processes of selection or review are frequent and circumstantial in the UK and Ireland as opposed to infrequent and non-circumstantial in Sweden and Denmark. The British Conservatives have since 1991 guarded themselves against too sudden a challenge with new requirements for a written notice by 10 per cent of the MPs, which, at present, amounts to a group of approximately 30-35 MPs. Another perspective is offered in Fine Gael's rules, which define the leader selection only negatively. The party constitution mentions only four occasions when reviews should take place as the result of, for instance, the party's not joining the cabinet formation process.¹²⁸ The Fine Gael Constitution, strictly interpreted, implies two things: it neither defines deadlines for challenges, nor (theoretically) excludes party leader elections on other occasions (although this possibility is not regarded as realistic in table eight). The one week notice in the table above refers to paragraph 52.iii, which states that a new leader of Fine Gael shall be elected no sooner than one week after 'the opinion of the parliamentary party' has been expressed that the incumbent is permanently incapacitated.

¹²⁸ Fine Gael Constitution and Rules, 52.iii.

The combination of a large electorate and a long notice for a challenge would be optimal for the incumbent. However, such a co-variation does not usually exist. Of the parties with a large electorate, the longest notice is the one-day notice of the Danish Social Democrats. It is problematic to assess the middle-forms, a large electorate with a short notice only (the Nordic parties) as against a small electorate with a long notice. However, the size of the electorate is related to the frequency of the selection occasions, which seems more important than the extent of a sudden coup (however, the Danish Conservatives combine a large electorate with yearly reviews). It is evident that a small electorate and a challenge on short notice constitute the potentially most dangerous constellation of factors for a leader (compare Fianna Fáil).

Figure 10. SAFEGUARDING THE PARTY LEADERSHIP: A SCHEMATIC TYPOLOGY

| | | PARTY LEADER ELECTORATE | |
|------------------|-------|--|---|
| | | large | small |
| THE CHALLENGE | long | the leader's optimal choice (Labour) | well organised parliamentary party coups (~Conserv.) |
| | short | party conference 'coups', Nordic parties | worst-case for the leader (Fianna F?) |

4.7.2 Does the Party Leadership Matter and How?

The prerequisites identified in this chapter are the basic and minimal procedural conditions for determining how autonomous and long-lived party leaders, and thus prime ministers, may be. The arguments do not point to how deselections have taken place, rather to why they have or have not taken place. There are very few breaches to the leadership contracts over time. A vast majority of party leaders have been made and unmade in accordance with the rules (despite some exceptions caused by the unregulated elections of Fianna Fáil and Fine Gael [until 1978] and the Swedish Social Democrats' two cases of death in office). The prominence of party leadership in Westminster, highlighted by the ritual battle between government and opposition usually leaves party leaders invulnerable in comparison to their colleagues in consensual regimes. However, it can be concluded that the major Swedish and Danish parties provide their leaders with at least as favourable institutional prerequisites for effective leadership as do the major parties in the UK and in the Irish Republic. The present [1996] Swedish prime minister Persson (Social Democratic Party) is the leader of the national party and the effective leader of the parliamentary party, which he has been destined to be by a party conference arranged only every four years.

The general lack of other institutional checks on the leaders can, at least partially, emanate from practical considerations and coalition elasticity. If a party is used to form a one-party cabinet, the need for checks on the chief decrease because he is moderated by the surrounding cabinet ministers who are likely to represent different party factions. The contract between the principals and their agent is therefore primarily determined by the leadership selection process and not by other institutional checks (including the remote possibility of arranging extra-curricular leadership reviews). Extra-curricular leader elections are rare, especially if the party leader is the prime minister. As a possible result of the implicit or explicit assumption in these major parties that their leader will be the first among equals, they seem to provide their leaders with a generous contract, allowing freedom of manoeuvre. A prime minister is always able to wield power in a variety of ways - utilizing the administration, the press, and patronage. A distinction between a party's position in government or opposition (as with British Labour), and further institutional party checks could theoretically be introduced to achieve a balance in most party leadership contracts, particularly because of the considerable 'fringe benefits' of the premiership. The British Labour Party's distinction between being in government or opposition today contributes

to an autonomous leadership, but such distinctions could be made with the opposite intentions: to impose restrictions on the leader.

Ultimately, does the party leader's accountability towards the party, enshrined in the leadership contract, influence the premiership? The general answer is that it does not do so negatively; the party leaders have enjoyed a strong position within their parties, particularly because there has been a link between the party leadership and the premiership. It would therefore be more correct to say that the premiership has influenced the party leadership. It is however vital to make a distinction between day-to-day politics and the specific event of party leader election. In daily politics a leader of any of these eight major parties enjoys an autonomous position. Even at possible occasions for leadership reviews the incumbent is favoured - but is far from being invulnerable.

Crossman's line of thought, that the leaders are all-powerful and can be removed only by a sudden coup, has to be refined. Party-internal coups are less likely to be sudden (especially in other than Scandinavian party conferences). In the British Labour party it is only a theoretical possibility to mount a sudden coup against a party leader-premier. Furthermore, to argue against the Crossman line of thought, the institutional setting could favour most party leaders even more. In as far as the contract favours the party leader, it does so in different ways in the Westminster and the Nordic systems. In Sweden and Denmark the contracts allow only rare leadership reviews. In the UK and Ireland there might be more frequent occasions to overthrow the leadership, but these review occasions are surrounded by specific conditions, notably when it comes to nominating challengers (4.6.3 and table eight). Among the parties discussed above, the most drastic changes have occurred within the British Labour Party, which accounts for three entirely different methods of electing the leader within 13 years. A reason for the changes by Labour, in 1981 and 1993, was that the parliamentary party, and the party leadership generally, was felt to be too autonomous and alienated from the rank and file. Today the leader is elected in a different way with 'omov', but the new rules are likely to have increased the autonomous status of the leader. It looks like the concepts of accountability and 'power' still are inversely related.

In Sweden and Denmark the leaders enjoy favourable party-internal prerequisites for clinging to power, which has resulted in long-lasting leaderships. When the leadership contracts in

Scandinavia are compared with the contracts in Britain and Ireland, it is also striking how unaltered and uniform the procedures are in Scandinavia, and, furthermore, that there seems to be no contract characteristics that are linked to party-political colour.

The argumentation in this chapter has in its entirety relied on the assumption that the party leader is a rational actor, which first and foremost implies a minimisation of risks (e.g. leadership elections). However, in July 1995 British politics showed that one must give rationality a broad definition. John Major's voluntary stepdown from the party leadership, in June 1995, in order to arrange an 'air-cleaning leadership contest' in July (i.e. technically required by his resignation from the party leadership but he did not resign from the office of prime minister) was an unprecedented event in modern history of British political leadership.¹²⁹ Theoretically this move proves fascinating. A too 'weak' party leader would not have submitted himself/herself to such a voluntary challenge and risk, neither would a 'strong' leader resort to such a demanding tactical move. John Major found himself in the twilight zone between parliamentary confidence and non-confidence and thus wanted to clear the air in the party, which he eventually managed to accomplish temporarily through his victory over the challenger John Redwood, however to a debatable extent. As for this study, the ultimate conclusion of this event is that even a formal resignation from the party leadership (while temporarily staying on as prime minister) can be used as a tactical move intended to strengthen one's position as party leader.

On the one hand the premiership influences the party and the party leadership. On the other hand party rules do influence the political scene, in the form of considerable variation in the frequency of and provisions for the crucial occasions of leadership review. In spite of its exceptionality, the ousting of Mrs Thatcher was conducted according to the rules laid out in the party leadership contract and her ousting showed that the deselection of a dominant party leader and prime minister is possible. Even though Mrs Thatcher had already secured a simple majority in the first ballot, the party rules forced a second ballot and, as the result of the withdrawal of the cabinet's support, the Thatcher era came to an end. The same rules also work the other way around: earlier a Conservative leader had to live with the constant possibility of being challenged. For the moment the rules contribute to keep Mr Major as party leader and prime minister.

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¹²⁹ For voting details and a historical perspective on the event, see Hennessy 1995, pp. 13-24.

5. THE PRIME MINISTER AND THE CABINET: THE INTERNAL DIMENSION

"There are variations among the countries in which cabinet government exists; there are also variations from cabinet to cabinet within each of these countries. National variations are often described and are generally better documented than cross-national ones, since cross-national studies on the subject are rare, while national studies have become numerous. Yet general remarks are not sufficient: we need to go further and attempt to assess the extent to which cabinets differ from one another."

R. Andeweg 1993

The Chapter Framework

After dealing with the constitutional basis for power dispersion in the government core, and the premier's party-internal setting as party leader, this chapter presents a picture of the premiership in the context of the cabinet. So far the study has predominantly been occupied with the question of how to reach the office of prime minister, and, subsequently, how one can be ousted from it. The study has hence been occupied with only certain specific conjunctures of politics. From now on it will deal with the prerequisites for the prime minister's day-to-day performance. The chief task of this thesis section is to put the office of prime minister in its systemic context, and compare the theory and practice of the office (i.e. chapter 3 on the constitution versus chapters 5-6 on the 'life' of the cabinet). This third investigative section of the study has two main parts, divided into two separate chapters which are related to the executive and its life cycle: first, the relationships *within* the executive - the *internal* dimension of the cabinet (chapter 5), and, second, the relationship with parliament and other institutions - the *external* dimension (chapter 6). This second part focuses particularly on two relationships: the premier and the national parliament and the prime minister's role in international politics. The two chapters are based on Jones's notion that in prime ministerial systems the cabinet is a core unit of analysis for an examination of executive power.¹ The premier exists by virtue of the cabinet and the cabinet by virtue of the premier: the cabinet is the core unit through which executive power is dispersed. The task is not to give an inclusive description of the workings of cabinet, in the tradition of Mackintosh or Jennings, but to pinpoint certain important stages, structures and characteristics that can be assessed in a cross-system comparison.

¹ Jones 1987, 1989. It should be noted that the 'executive' is here synonymous with the cabinet, 'ministers' thus implies cabinet ministers.

The key concept is cabinet government and its forms of decision-making. Cabinet government in its most unblemished and theoretical form presupposes that the cabinet has both a *collegial* and *collective* character.² Collegiality implies the cabinet ministers have an equal position and equal say, chaired by the prime minister - the classic *primus inter pares*. This view is often analyzed by the degree of existing hierarchy within the cabinet. Collectivity, on the other hand, stems from the doctrine of collective responsibility, which suggests, however theoretically, that ministers are directly accountable for their domain of affairs, and, more notably, that they are obliged to support cabinet decisions in public. Deviations from the initial cabinet government model usually arise from these two basic concepts, or even a confusion between the two: "*Indeed, the deviation from the idea of full equality is likely to be at least as large as the deviation from the ideal of a fully collective government*".³ Collegiality is a dimension which has been given many names. Above it was paralleled to the extent of hierarchy. In fact it could even be seen as a most crucial dimension for the position of the prime minister, since the cabinet collegiality is much the same as the prime minister's 'power' in cabinet: a simultaneous optimisation of collegiality and prime ministerial authority would be a contradiction in terms. In no democratic system is the premier able to wield total authority in the cabinet. The critical theses of 'prime ministerial government' imply that decision-making is oligarchical and too concentrated in the hands of the premier or, as above, in a small group of key ministers. According to Andeweg the indicator *par excellence* of an oligarchical cabinet system is the existence of an inner cabinet. Furthermore, he defines a collegial cabinet as being a system where there is "*no inner cabinet (informal or formal) and where the prime minister cannot be regarded as having powers (constitutionally or de facto) that strengthen him or her markedly in relation to the ministers*".⁴ Indeed this view probably is correct; however, it does not help at all in the arduous task of creating sustainable means for understanding the levels of hierarchy in the cabinet.

² Andeweg 1993, pp. 25-26. A sustainable definition of what 'cabinet government' entails is not necessary for this study. For one of the best bibliographies on cabinet government, see the references in Blondel & Müller-Rommel's *Governing Together* (1993, includes Andeweg 1993).

³ Ibid., p. 26.

⁴ Ibid., p. 28.

To determine the position of the whole cabinet - and indeed the position of the premier, is it sufficient to only look at the cabinet structures? Mackie and Hogwood pointed to the multitude of decision-making *arenas*, of which the full cabinet indeed is only one.⁵ Other scholars have preferred to use other concepts to embrace the cabinet system, for instance, 'the core executive'.

The sole examination of certain features of cabinet should be defended. First, this study is comparative and therefore differences in the relative importance of the cabinet are likely to be visible in a way which would not be the case if the study would deal with only one system. Second, the emphasis of this study, as opposed to other analyses, is on explication of the position of the prime minister - not to deliver a macro-perspective view of national decision-making processes. Again, the conclusions accounted for in the major project *Governing Together*⁶ form a convenient point of departure for the connection between cabinet structures and decision-making: Thiébault emphasises four central elements which form the basis and fundamental assumptions for the analysis undertaken here. He stresses the role of structural arrangements, the role of 'national cultures' and de-emphasises the role of the party-political as well as the single-party versus coalition dimensions. In the concluding section he states that:

"... the relationship between cabinet structural arrangements and cabinet decision-making processes is strong. In Western European cabinets, decision-making processes developed on the basis of the different country 'cultures' that produced different structural arrangements. These 'cultures' appear to be truly alive; in particular they cut across both the distinction between parties of Right and Left and the distinction between single-party governments and coalitions."⁷

⁵ Mackie & Hogwood 1985.

⁶ Blondel & Müller-Rommel (eds.) 1993.

⁷ Thiébault 1993, p. 97.

Two of the four systems dealt with in this study, Britain and Sweden, have been seen as forerunners of the so-called cabinet system (all four political systems have, however, been defined as cabinet systems).⁸ Throughout the prime ministers have been superficially referred to as the cabinet's *primus inter pares*, but when one looks at the roles of the prime minister in the cabinet, several factors could be the cause for variation in the premiership's position and status. These factors are explicitly constitutional, like the right to dismiss cabinet ministers, or can lean on *jus*, context and convention, like whether the cabinet routinely votes on issues or has to reach a consensus to make decisions of importance.

The 'life' of any cabinet can be divided into three main stages: the formation, work and termination of the cabinet. This chapter will deal with the cabinet roles of the premiership in three sections: the role of the premier-to-be at cabinet formation, the premier and termination of the cabinet, and the roles of the premier in everyday cabinet work. Thus the aim is to analyze the stages of a cabinet's 'life' and to analyze cabinet procedures that vary from system to system and therefore potentially provide the premiers with different institutional prerequisites for cabinet leadership.

The termination of a cabinet is frequently connected to parliamentary issues, which will be dealt with in the next chapter.

⁸ Blondel 1988a, p. 1.

Which are then the basic role models for a prime minister in cabinet? Sartori states that some order can be brought to 'the maze of power sharing' by looking at how the head of government relates to the members of his/her government.⁹ In his semantical fashion he discerns four possibilities:

0. A *primus solus*
1. A *first above unequals*
2. A *first among unequals*
3. A *first among equals*

The first option entails power concentration in one person with a 'private cabinet' and is the only one which intuitively seems to be of less interest for this study. This model primarily refers to a presidential system (e.g. the United States presidency) rather than a parliamentary cabinet system. The other possibilities are all the more relevant. Sartori mentions three criteria for being a *first above unequals*. A chief executive that i) is a party leader, ii) is unlikely to be unseated by a parliamentary vote, and iii) appoints and changes cabinet ministers at his or her will.¹⁰

A *first among unequals* may not be the official party leader but can unseat other ministers, who, however, cannot unseat the premier: thus he is a premier expected to remain in office even when his cabinet members change. The third alternative, an 'ordinary' *first among equals*, is a prime minister who falls with his/her cabinet and has limited possibilities of intervention in the work of other ministers. The benefit of this categorisation is that it describes categories that are relatively constant and exclusive and has repercussions on the work of the cabinet.

⁹ Sartori 1994.

¹⁰ Ibid., pp. 102-103.

GETTING TO THE TOP

5.1 The Prime Minister-Designate and the Stages of Cabinet Formation

The referral to Sartori's taxonomy above makes one pose the question: *Do prime minister-designates already have an entirely different position at the starting line?* The structure of the cabinet is a foremost determinant of a cabinet's resources and results (e.g. large-small, specialists-generalists). For that reason it is necessary to compare different scenarios a prime minister-designate encounters, all of which emanate from the 'cabinet structure'. The premier's role in the cabinet formation process has been a problematic and therefore avoided topic since it touches the subject of coalition and political bargaining theory.¹¹ This section deals with institutional aspects of cabinet formation, thus excluding specific party-political variables.

There are considerable general differences in the party systems and hence in the coalition elasticity of the four different political systems. But, ultimately, is the role of the premier designate different when it comes to the cabinet formation process? In the systems dealt with there are two possible positions of departure for the premier *in spe*. If it is taken for granted that the premier designate is a party leader, the designate faces the process of cabinet formation either after a general election victory or after the stepdown of the preceding party leader (or, theoretically, faces both at the same time). The *formateur's* crucial questions are:

A. ***Which formal and informal criteria restrict the cabinet formation process?***

This question can be divided into three sub-parts:

A1. **The cabinet structure.** Is the premier designate heading a

A1.1 one-party cabinet, or

A1.2 a coalition cabinet (this alternative usually excludes option A2.2 below)?

¹¹ E.g. cabinet formation processes were not dealt with in Weller's systematic analysis of Westminster prime ministers (*ibid.*, 1985).

A2. The political context. Did the premier designate reach the position by virtue of being

A2.1 the leader of the largest party in parliament after a general election, or

A2.2 by virtue of party leadership only (after the stepdown of a preceding leader)?

A3. Other contextual factors. What limits the range of choice based on the two factors above

and the system context? (continues as sub-questions B)

A premier heading a coalition will by definition have to devote much more time to program and portfolio questions. The systems have different traditions in this respect. Britain entirely lacks a tradition of coalition government (save war-time cabinets); in the Irish Republic the tradition is closely connected to Fine Gael and Labour governments (contrary to 1992-1995); Sweden has a limited experience of coalitions and, finally, Denmark almost exclusively has a coalition tradition.

The second question (A2) reflects a frequent dilemma and is worth analysis as it has hardly been dealt with. Almost half the British prime ministers have acquired their position by virtue of party leadership only - by 'inheriting the job'. In Sweden four Social Democratic prime ministers, a majority of the post-1945 PMs, have been in the same position: Erlander (1946), Palme (1969), Carlsson (1986) and Persson (1996). Does such a situation imply that prime ministers have to wait a considerable time before they are able to carry out extensive reshuffles of the cabinet, i.e. that they inherit cabinets? Be it theoretically a one-party or a coalition cabinet, is it the case that when the premier inherits the office, fewer ministers can be chosen and over a longer period of time? Logically a premier designate who has the opportunity to start from scratch is likely to enjoy a stronger position within the cabinet as the range of patronage is considerably larger.

The third sub-question posed in A is the most clear-cut for the premier. Almost without exception cabinet ministers are senior members of the parliamentary party. However, there might also be constitutional clauses that regulate the process of cabinet formation. Many nations have domesticity clauses, only allowing a citizen by birth to acquire high office. The Swedish Instrument of Government of 1974 is comparatively liberal in stating that any person who has been a Swedish citizen for ten years can become a cabinet minister. Another

possibility is that the constitution sets a maximum or minimum limit for the number of cabinet ministers, as in Ireland (disabling the possibility of major structural alterations caused by the need to deliver political rewards.) Another unexceptional clause forbids ministers to stay on as MPs while in cabinet, as in Sweden.

With the criteria for selecting each minister, point A3 above, there are two dimensions that form points of departure (B1 and B2); either of these two dimensions is the focus of the political bargaining process:

B. *Which cabinet formation stage is emphasised, based on the questions in A above?*

B1. The portfolio stage. The allocation of portfolios and agreement on a government agenda (coalition cabinets, see A1)

B2. The person stage

(linking portfolios to persons).

B2.1 To select a person belonging to the PM's party, or

B2.2 To select a person from another (coalition) party.

B2.3 To select a person based on political rewards (political hierarchy)

B2.4 To select a person based on merits and expertise (meritocracy)

B2.5 To select a person based on representational grounds (example: ethnic groups)

By systematically looking at the formation process, it can be understood that only certain stages involve the prime minister-designate. If the designate is heading a coalition government, stage B1 inevitably will be emphasised, but there is very little evidence of the head of government being able to alter the constellation. Coalition formation is a clear example of a zero-sum game, where a gain for one partner is the loss of the others. Often the premier-designate, if one exists at all, is separate from the person in charge of this portfolio bargaining. It is carried out by an *informateur* (as often in Denmark), who eventually sets down the rules of the game and appoints a party leader as premier-designate.

When it comes to stage B2, the selection of the personnel, the premier-designate's primary role is to exercise power by selecting individuals from the ranks of ~~the~~^{his or her} own parliamentary party. This power is typically accentuated in single-party cabinets. In a coalition cabinet the portfolios are allocated in the B1 process, after which the subsequent stage, B2, is managed within each coalition party individually. The premier usually has very limited possibilities to influence the decision of the coalition partners. Still, the linking of portfolios to persons within ~~the~~ own party is the foremost task of the premier designate, and thus also his/her foremost way of exercising power, which leads us to examine how freely the designate can choose his/her ministers. If the premier-designate 'inherits' the cabinet because of party leadership succession there is no B1-stage at all, be the government a single-party government or a coalition. In three out of the four systems dealt with (not Britain), the portfolio stage B1 is of importance, but of these three systems only occasionally in Ireland and Denmark does the premier play a significant role. Formation processes are summarized below.

Table 10. CABINET FORMATION IN A COMPARATIVE PERSPECTIVE

| | |
|--------------|--|
| U K | Premier designate appointed by the Monarch. No portfolio stage (excl. some specially redesigned chairs) Ministers from the parliamentary party, no formal restrict. Shadow cab. binding after gen. el./ No direct vote in parliament on the cabinet members. (Size of the parl. parties: 326-400 Cabinet size: 19-21) |
| I R E | Premier nominated through informal negotiations in the Dail Coalition=portfolio stage (informal and unregulated). Ministers from parliamentary parties, constit. max: 15 min:s No vote in parliament on the cabinet, only on the premier. (Size of the parl. parties: 81-40 Cabinet size: 12-15) |
| S W E | Premier designate appointed by the Speaker (formalised). Occasional portfolio stage managed chiefly by the Speaker. Quite free choice of min:s (prohibited from being MPs) No vote on the cabinet, only on the premier (negative investiture) (Size of the parl. parties: 163-32 Cabinet size: 20-22) |
| D E N | Premier designate appointed by the Monarch (informal negot.) Portfolio stage managed by an informateur and the designate Quite free choice of min:s (no formal restrictions) No vote on the cabinet, nor on the premier designate. (Size of the parl. parties: 76-38 Cabinet size: 18-20) |

The parliamentary parties sizes are maxi-min:s of the two major parties (see chapter 3).

The premier plays a key role in outlining the government agenda. This stage usually has to be completed before the allocation of portfolios can begin (or, logically, the nomination of the persons). The premier's power lies in the selection of ministers within the own party. Even at the stage of nominating the ministers, the actual freedom of the prime minister is limited. Even if the premier enjoys the almost total theoretical freedom of 'hiring and firing', as in the UK, aspects B2.3-B2.5 severely circumvent the freedom of choice. When dealing with the stage of nominating ministers within the party, it was important to shed light on the party leader's position within the party as in the preceding chapter. Theoretically, a party leader who enjoys a very autonomous position within the party is likely to enjoy a greater freedom of choice when selecting his/her team of ministers. In practice, however, the differences tend to be minuscule. A British Conservative leader is elected party leader by the parliamentary party, which means that it has to be rewarded accordingly. The present Labour leader enjoys a strong position within the party, but is traditionally heavily bound by the shadow cabinet (which in

turn reflects the party's different factions).¹² In addition, Labour's tradition prescribes that the defeated candidate from the party leadership race is given a prominent cabinet position. The Conservatives are less gentle in this respect: Thatcher, for instance, never offered Heath any positions. In Britain the parliamentary party is the omnipotent forum for potential cabinet ministers.¹³

In comparison the hands of an Irish Taoiseach from Fianna Fail or Fine Gael are less tied. In Sweden the prime minister, notably a Social Democratic leader, has been able to pick cabinet ministers from outside the parliamentary party élite.¹⁴ Despite the collegial character of the Swedish cabinet, the selection of ministers lies in the hands of the prime minister (the selection is for instance not discussed officially in any Social Democratic party body¹⁵).

In conclusion, the role of the prime minister-designate varies between the systems when 'setting the arrangements'. The variation lies in the extent of freedom of choosing ministers within parties. However, on the whole the prime minister's institutional options at the cabinet formation process are limited, indeed very limited, regardless of the system.

¹² See, e.g., Labour Party Standing Order E (1994): "When the Party is in Office, the Cabinet shall continue to be appointed by the Prime Minister. On taking Office as Prime Minister, the Leader shall appoint as members of his cabinet those who were elected as members of Parliamentary Committee *at the Dissolution and have retained their seats in the new Parliament.*"

¹³ Usually a couple of ministers are from the House of Lords, and at a slightly higher frequency in Conservative governments.

¹⁴ Ruin 1991, p. 64.

¹⁵ Idem 1990, pp. 101, 105. See also idem 1986, p. 116 and idem 1991, pp. 62-64.

5.2 The Cabinet and Party-Internal Succession of the Premiership

The bonds between the prime minister (the constructor) and the cabinet (the construction) are taken as forceful across the political systems. Cabinets are often referred to using the premier's name: the Major government, Carlsson II, the Jörgensen cabinet. Many governments exist only by virtue of the skills of their leaders. Yet there is a considerable difference between systems in the options the cabinet collectively faces when its premier is replaced or resigns. On the surface this is a result of different traditions of accountability, or the degree of collective responsibility. The problem, however, is that few political systems strictly obey only a tradition of collective responsibility. The concepts of individual and collective ministerial accountability are not mutually exclusive.

Even the concept of what constitutes a government seems to be a dilemma for political science. Most often the basic criterion for registering a new cabinet is that a new head of government is appointed.¹⁶ This way of counting cabinets might be practically necessary but it is deceptive for several reasons. When a combination of a relatively unstable party leadership and a relatively stable cabinet exists, a stable government structure based on the same cabinet ministers might nominally appear as a number of different cabinets, and hence be interpreted as unstable government. Denmark has often been interpreted as such a relatively unstable system. The opposite is as rationally feasible (e.g. Britain under Mrs Thatcher), and implies that the premier is the same person, but that the rest of the cabinet changes (cabinet reshuffles are dealt with in a later section).

A considerable number of the prime ministers, especially in Britain, have entered office without winning general elections, i.e. only by virtue of being appointed party leaders (see the preceding chapter). Under normal circumstances this new premier is a senior cabinet minister, who has to form the new government with the advantage and burden of an old administration from the same political group(s). Where the previous prime minister stepped down as the result of political conflicts or scandals, the formation of a new cabinet on the same political

¹⁶ This is the rational categorisation that most data aggregates subscribe to, most notably the data in EJPR, June 1993 (volume 24) that is used extensively in this chapter.

basis might prove difficult. A recent example is the arduous round of negotiations that started in December 1994 after the downfall of the Irish prime minister Albert Reynolds. On the other hand, the predecessor might leave office when the situation is fit for a change of generations and, hence, leaves a government that is governable. Similarly, the successor might have had time to prepare for the change, or be forced to chair the national executive suddenly because of unprecedented circumstances, like the Palme assassination in 1986. The focus of the analysis in this section is on the question whether the new incumbent 'inherits' a cabinet with all its senior ministers, or whether a new party leader is able generally to shape the cabinet to his/her demands. There must be variation that depends on the specific contexts and circumstances, yet the general implications of different traditions are notable. A new leader, who practically inherits the cabinet, can reform the cabinet only over a considerable period of time and might effectively have to govern on the terms of ex-colleagues, the senior ministers. A political tradition, nation- or party-specific, that irrespective of the circumstances makes a thorough reshuffle of the cabinet possible when taking up office, will help to make the role of the chairman more than that of a first among equals. As in all work-intense assemblies, the group dynamics is set in an initial phase of its existence.

In Britain there have so far been five occasions of transitions from a resigning party leader to a government by the successor in post-1945 politics.¹⁷ The first of these occasions was the transition from Churchill to Eden in 1955, which brought about a major change in cabinet. Only 31 per cent of the cabinet ministers carried on in Eden's administration. When Eden resigned in 1957, a record-high 47 per cent of the cabinet ministers stayed on in Macmillan's cabinet. When Douglas-Home formed his cabinet after Macmillan's resignation in 1963 only four out of 19 ministers carried on (i.e. 21 per cent). The only case of internal succession of the premiership within Labour is the takeover of Callaghan after Wilson in 1976. On this occasion 39 per cent of the Labour cabinet ministers stayed in cabinet.

The latest example is the takeover of Major after the downfall of Mrs Thatcher, which was the start of a new era in Tory politics - only 19 per cent of the ministers continued in the new

¹⁷ The figures below are calculated from EJPR, June 1993. The British changes are: Churchill->Eden 1955, Eden->Macmillan 1957, Macmillan->Douglas-Home 1963, Wilson->Callaghan 1976 and Thatcher->Major 1990

cabinet. On the average 30 per cent of the cabinet ministers have thus continued in a cabinet under a new chairman (in absolute figures 4-9 ministers in cabinets with a total of 16-21 members), which implies a tradition of large-scale cabinet changes under new British party leaders. These figures are comparatively large when one bears in mind the relative autonomy enjoyed by senior ministers. In the Irish Republic the notion of 'inheriting cabinets' cannot formally exist because of the stringent tradition of collective responsibility. On the latter, and more significant, of the two post-1945 occasions of Irish premiership inheritance (De Valera->Lemass 1959 and Lynch->Haughey 1979), only 37.5 per cent of the ministers continued in cabinet. On the first occasion De Valera's longtime leadership was so undisputed that it is understandable that ten out of twelve ministers continued in Lemass' cabinet in 1959.

In Sweden there are only four cases of party-internal succession of the national premiership, all of which concern the Social Democratic Party. Two of the situations were, however, so special that they have to be disregarded.¹⁸ When Erlander took over the chairmanship of the cabinet in 1946, 14 out of 16 ministers carried on in the cabinet, which is comprehensible as Erlander unexpectedly had to step in after the death of preceding premier P-A Hansson. As with the succession of the party leadership, there are only two occasions at which ordinary changes have occurred. The first change was the transformation from the Erlander era to the Palme era in 1969. Palme made a revision of the cabinet, and 11 out of 17 ministers stayed on in his first cabinet (65 per cent). The second ordinary change occurred when Göran Persson was elected head of SAP in 1996. In March 1996 16 of 22 ministers continued in cabinet, including the new premier Persson (73 per cent).

When Carlsson took over after the tragic loss of Palme in 1986, there were only minor formal changes to the cabinet, again very comprehensible. With a very small number of cases in Sweden - and from only one party, one nevertheless dares say that a substantial part of the ministers are likely to stay on in one-party cabinets despite a change of leadership. The same statement becomes even more pertinent when one focuses on Denmark.

¹⁸ The death of the prime minister: after the assassination of prime minister Palme in 1986, the same cabinet continued under the new prime minister Carlsson (except for a few portfolio changes internally).

In Denmark the first post-1945 object of examination is the Hedtoft administration, which was taken over by Hansen in its entirety (1957) and only one change was registered. In 1960 that was also the case when Hansen was succeeded by Kampmann. When subsequently Krag replaced Kampmann two years later 82 per cent of the old cabinet continued. The truth behind the nominal figures is that virtually the same cabinet governed Denmark as a number of separate governments under four different premiers: Hedtoft, Hansen, Kampmann and Krag. Furthermore, when Jørgensen replaced Krag in 1972, the cabinet continued without a single change of portfolios. Under such circumstances it is difficult to imagine that the prime minister could be anything but a *primus inter pares*. However, as with the Swedish case, all these Danish examples concern only the Social Democratic Party.

Nevertheless, from a comparative viewpoint, one can thus discern different traditions of 'cabinet inheritance'. New cabinet leadership without a reshuffle is possible only in a very consensual atmosphere. In Denmark, several of the inherited cabinets were coalitions (e.g. Hansen->Kampmann and Kampmann->Krag), which has several implications. First, the succession of a coalition government enhances the thesis of consensual politics. Such a situation can only with difficulty be imagined in many other political systems. Second, if the inheritance of a coalition is feasible at all, it is likely to take place without changing the often very fragile coalition balance - hence the minimal changes in the Danish coalition compositions. *Ergo*, the least favourable, however feasible, point of departure for a prime minister is to take over the leadership of an already existing coalition cabinet. Most political systems do not adhere only to a solid collective responsibility as in the Irish Republic, e.g. Britain,¹⁹ Sweden and Denmark are all categorised as adhering to both collective and individual responsibility, which multiplies the possible cabinet scenarios if the premier resigns.²⁰

In Britain no change of prime minister has occurred without a reshuffle (post-1945). In the Irish Republic the premier's resignation normally means the downfall of the government

¹⁹ The doctrine of accountability is double-edged even in Britain, despite of its being the model for the concept of 'responsible government'. 17

²⁰ See, e.g., Parliaments of the World 1986.

(which does not impede the chances of the same group to re-establish a similar government). In Denmark the rule is that, at least, Social Democrat-led cabinets are taken over by the new party leader without portfolio changes. The role of the succeeding premier is not only decided on a circumstantial basis. There are perceivable system-specific institutional aspects of 'cabinet inheritance'.

The cabinet's likelihood to terminate because of the prime minister's resignation can be called the cabinet's *termination elasticity* (in the next chapter, a section [6.3] examines the general reasons for cabinet termination in more detail). The higher the elasticity the less likely is the government to collapse and lead to a general election because of a change of the premier. This 'termination elasticity' is closely connected to the single party/coalition-variable. In most systems the elasticity is high if the government consists of only one party, the manifest example being the British cabinet. When governments are coalitions, the system-specific differences surface. In Britain a coalition would be likely to survive the departure of its constructor only under very special circumstances (e.g. like the Palme assassination in Sweden).

The involved figures are, however, only coarse descriptions as the total number of cabinet ministers varies considerably: in the case of Britain alone between 16 (Churchill) and 24 (Callaghan) cabinet ministers. Another factor that has to be accounted for is the party size (or parliamentary party size). Within a party that holds the majority in the British Commons there are enough personal resources to carry out far-reaching changes of the cabinet, whereas it is likely to be a less feasible possibility in, e.g., Denmark. The size factor cannot alone account for the apparent difference in traditions within the British Conservatives and the Danish Social Democrats.

It is essential to perceive that a resignation of the prime minister does not necessarily suggest a political step-down: instead a resignation can be used as an ultimate political tool. In the summer of 1995 we learnt that also a resignation from the party leadership, while retaining the premiership, can be an ultimate political move (see the preceding chapter on the Major leadership). Again, a thorough analysis has to go beyond the figures. In a serious executive-legislative deadlock the PM is supposed to call a general election or the cabinet should resign. In Britain the whole scenario is unlikely under the present system, but in other systems a lack of explicit means of majority government and a positive vote of investiture (in Sweden and Denmark), is one momentous linkage between cabinet termination and formation.

A system which has often seen minority cabinets is less likely to have a positive vote of investiture, and minority cabinets are likely to be defeated on issues that do not divide the parliament according to party lines. Thus, a prime minister defeated on a less fundamental issue can, simply, resign formally and immediately return with his/her cabinet after dropping or changing the problematic issue at stake, especially if the cabinet is dominated by one party or is a one-party cabinet. A swift reorganisation in the name of a resignation is possible if there is no positive investiture in the prime minister and no other formal parliamentary vote on the cabinet. Sweden has experienced one notable and recent example of this situation. In February 1990 the Swedish premier Carlsson put forward a restrictive economic program, which was turned down by parliament and, thus, the premier resigned. After eleven days of political vacuum, the Social Democratic cabinet re-emerged with a slightly different allocation of portfolios.²¹ Apart from the Swedish lack of a tradition of parliament dissolution, this process was enabled by two main factors: no positive investiture of the government and a one-party cabinet.

²¹ Sannerstedt & Sjölin 1990, pp. 95-96. At the time the Social Democrats represented 44.7 % of the parliament (50.7 % with the consenting votes of the Communists).

LEADING THE CABINET

5.3 The Cabinet: The Internal Dimension

The Prime Minister as Cabinet Chairman

The notion of the prime ministership stems from the role of chairing the political executive collective of a nation. Cabinets acquire their names according to their premiers; the prime ministers are the most important and externally visible parts of the executive. The prime ministers are often able to wield power in cabinet with the help of a variety of administrative and political resources, ranging from agenda-setting to the creation of cabinet committees. Apart from being the most important role of the premier, chairing the cabinet is the most difficult to scrutinise, partially because a haze of secrecy often surrounds the executive. For this reason many scholars have tried to broaden the focus. Mackie and Hogwood talk of decision-making *arenas*.²² Dunleavy and Rhodes use the term *core executive* to describe the central decision-making processes; others prefer to talk of the *cabinet system* as a term that encompasses cabinet committees and other structures close to the cabinet collective.

Prime ministers must play on a multitude of strings even within the cabinet. They must keep the cabinet unified, maintain policy consistency, take care that due consultations have taken place and ensure the decisions are administratively feasible.²³ There has also been a variety of ways to perceive the premiership. In Britain scholarly debate even crystallised into schools of thought, with Crossman and Mackintosh as two of the prominent envoys of the argument that cabinet government has been replaced by prime ministerial government, notably that the cabinet, like the monarch, is a dignified but ineffectual part of the constitution.²⁴ Others, like Jones, have continued strenuously to emphasise the role of the cabinet.²⁵

²² Mackie & Hogwood (eds.) 1985, see especially pp. 1-16.

²³ See Weller 1985, p. 107. See also Jones 1975.

²⁴ Crossman 1963, Mackintosh 1977, see also Weller 1991.

²⁵ Jones 1995.

Until mid-1990's there were, however, few comparative studies of national executives. A notable contribution to understanding the workings of national executives was the volume *Governing Together*.²⁶ In this work, based on questions put to cabinet ministers, Müller *et al* state that:

"Of all the components of cabinet life, perhaps the one most likely to give rise to major variations is the prime ministerial component."²⁷

In *Governing Together* the analysis of the premier's role in the cabinet and its decision-making is, however, confined to a macro-level with only a few references to specific contexts in West European nations. The citation above refers to a variation across systems, not that the prime ministerial component is what creates major variations within the confines of one system (which is likely to be correct to a certain degree). The results of Müller *et al* form a point of departure for this study, both when it comes to their approach and their results. What this study explains is the cross-system variation in 'the prime ministerial component'. Among their conclusions (cp. the citation above), they state that the influence of different *prime ministers* [on policy-making] does not vary markedly over time, and that this bears no obvious relation to the longevity of the leadership.²⁸ Similarly they declare that the 'style of the prime minister' does not seem to confine to party affiliation.²⁹ In the same volume Frogner states that factors other than the single-party/coalition distinction play a substantial part in shaping the style of cabinet decision-making.³⁰ Later in the volume Müller *et al* state that "... *the role of prime ministers does not appear to be influenced by the single-party/coalition distinction.*"³¹.

²⁶ Blondel & Müller-Rommel (eds.) 1993. The work includes all political systems examined in this study.

²⁷ Müller, Philipp & Gerlich 1993, p. 223.

²⁸ Ibid., p. 229.

²⁹ Ibid., pp. 237-238.

³⁰ Frogner 1993, p. 70.

³¹ Müller, Philipp & Gerlich 1993, p. 235.

This section examines the role and position of the premier in the cabinet in the UK, the Irish Republic, Sweden and Denmark. If the role does not vary substantially over time (as has been purported above), it must imply that the institutional setting is crucial for understanding *when* and *how* the premier can make a difference in the cabinet and its policy-making. However, any study of the inner workings of cabinets must be divided into sub-studies of important factors, with the greatest problem being that of delimitation, what to include. Weller makes a division between two categories of prime ministerial power in cabinet: the structural 'setting the arrangements' and the more informal 'running the proceedings'. This study uses the same approach as in the earlier chapters. Instead of describing cabinet proceedings from system to system, cabinet life will be examined by comparing a number of key dimensions, defined below in the search for where, when and how the prime ministerships make a difference, and how notable differences there are between government practices that superficially seem to resemble each other.

5.3.1 The Cabinet Forum

The full cabinet as a collective forum for key decision-making has frequently been criticised as being incapable of coping with a vast number of decision within vast spheres of interest.³²

"The cabinet.. is involved in continuous struggles to manage the unmanageable, routinise the extraordinary, systematise the disorderly, and co-ordinate the incoherent."

Before looking at its specific decision-making procedures, the overall character of the cabinet as a forum has to be appraised. The role of the cabinet in a political system as a forum for decision-making relativises all subsequent questions about the cabinet: the cabinet agenda, the methods of decision-making and the composition of the cabinet. Possible differences may appear in several ways. The full cabinet might meet frequently or only infrequently, the meeting might be of a highly official or only unofficial character (or - as in some cases - both), and there might or might not be formal procedural rules.

³² See, e.g., Dunleavy 1995, Blondel 1988 and Andeweg 1993, p. 24-27.

In Britain the cabinet meeting is of a formal character and meets on a weekly basis (usually Thursdays).³³ There has been some variation in the practice under different prime ministers. The cabinet convened twice a week under Attlee and Churchill.³⁴ In the Irish Republic the cabinet meeting is of an equally formal character, with two meetings weekly and an agenda usually comprising 10-50 items. In Sweden, contrary to the UK and Ireland, there are different kinds of cabinet meetings: the formal meetings and the more informal, yet institutionalised, so-called lunch meetings. The formal cabinet meeting, the *Regeringssammanträdet*, sometimes referred to as the general meeting, is the official forum for cabinet decision-making, but its procedures are highly formalised and the agenda is seldom changed at or before the meetings. According to Swedish custom, each Ministry (swedish: *departement*) contributes with a list of items, for the overwhelming majority of which a decision already has been reached within the ministries and needs only formal cabinet approval. To handle the very vast number of decisions formally to be taken by the cabinet, it keeps its informal '*lunchberedningen*' on weekdays, with an attendance which has been described as "*surprisingly high*".³⁵ However, in 1994-1995 attendance declined. Both types are chaired by the prime minister.

In Denmark the cabinet meeting is based on weekly sessions, as in the three other systems. As opposed to the Swedish tradition of separating the cabinet meeting into two very different kinds of meetings, the Danish cabinet meeting has been described as a genuine forum for discussion.³⁶

³³ There is also a tradition of 'political cabinet' meetings which usually take place after the cabinet meeting.

³⁴ Burch 1988, p. 21.

³⁵ Larsson 1988, p. 210.

³⁶ Schou 1988, p. 180.

5.3.2 The Cabinet Agenda

The agenda forms the basis for the cabinet meeting and is of considerable strategical value. In his account of Westminster prime ministers Weller argued that the use of 'the agenda power' has been regarded as one of the most potent weapons of the prime minister.³⁷ The argument seems reasonable as there are several *de facto* ways the prime minister can manipulate the meeting by agenda-setting. The premier might be allowed discretion in the selection of items for the agenda (a common feature of most West European systems), which implies two directions of manoeuvring:

- i) that the premier is able to prioritise certain questions, or
- ii) that the premier is able to keep certain items off the agenda.
(- For how long?)

To keep certain items off the agenda is the most likely means of exercising influence over the cabinet policy-making. At the stage of cabinet decision-making an issue can be referred by the premier to a permanent or *ad hoc*-cabinet committee. Even when a certain item is on the cabinet agenda, there are several ways of attempting to orchestrate the decision-making towards a favourable outcome. The premier is likely to be able to decide on the order in which the items are listed on the agenda, or can try to 'flood' the agenda with items.³⁸ The various possibilities depend on two further factors:

- a) the formal/informal rules on how the agenda is drawn up
- b) the extent to which the (full) cabinet meeting is a genuine forum for discussion.

³⁷ Weller 1985, p. 108.

³⁸ Ibid., pp. 110-111: "... may be an equally effective way of controlling.. as trying to isolate the cabinet from some issues." Weller accounts for the use of this tactic in Australia, notably by the Fraser administration.

On the other hand, the full cabinet might discuss questions off the agenda. The extent to which ministers are free to raise issues for discussion in cabinet seems to make a difference. Many topics placed on the agenda are the result of lengthy deliberation in other arenas, but there is always room for flexibility which may give the prime minister, on the one hand, or individual ministers, on the other hand, greater or less possibilities of influence.³⁹

In the United Kingdom the agenda is officially drawn up under the auspices of the prime minister. There are no formal rules for cabinet procedures.⁴⁰ The procedures are only laid out in the theoretically confidential document "*Questions of Procedure for Ministers*". Traditionally there are only two-three standing items on the British cabinet agenda, including parliamentary and foreign affairs.⁴¹ In Britain it is the prime minister, with the aid of the Secretary to the Cabinet, that *de facto* draws up the agenda. There is material purporting that the agenda has been used to favour the premier, mainly by not discussing certain important issues at length in cabinet. Castle has claimed that Wilson denatured the cabinet by making the agenda very thin, and in the 1980's Mrs Thatcher did not discuss the Falklands crisis in the full cabinet: "*at times the war committee simply reported to it*".⁴² On the other hand, Burch has described the agenda-setting possibilities of the premier as limited, despite this British lack of formal rules.⁴³ The British premier could conduct the cabinet's decision-making with the help of the agenda-setting, however this possibility should not be overemphasised. The flexibility of the 'rules' gives different prime ministers opportunities to manage cabinet proceedings in different ways, and cabinet ministers are expected to stick to the agenda.⁴⁴ The term 'prime ministerial control', as used by Weller, seems adequate to describe the premier's role when it comes to the cabinet agenda, but it is hard to generalise

³⁹ Thiébault 1993, p. 82.

⁴⁰ See, e.g., table 5.1 in Burch 1993, p. 102, *idem* 1988, pp. 17, 21.

⁴¹ Weller 1985, p. 111 and Burch 1988, pp. 22-23.

⁴² See Weller 1985, p. 111, Castle 1980.

⁴³ Burch 1988, p. 23.

⁴⁴ *Ibid.*, p. 28.

further about the degree of control, which varies with the issue in question and the preference intensity attached to it.

In the Irish Republic the Taoiseach determines the order of cabinet proceedings. There is a document similar to the British guidelines, the "*Government Procedure Instructions*", which sets out the basic rules for cabinet business, a domain otherwise strongly influenced by the Taoiseach. Farrell goes even further when he states that

*"Procedure, practice and power make the Taoiseach master of the cabinet. The Taoiseach determines the order in which items on the cabinet agenda are taken, the time given to consideration of each item, who is to speak, and when a decision should be reached - or postponed."*⁴⁵

Furthermore, Irish cabinet ministers do not challenge the Taoiseach's control of the agenda.⁴⁶ Figures on how many items that usually are on the agenda show the variation is considerable: between 10 and 30 items.⁴⁷ This 'chronically overloaded agenda'⁴⁸ is managed with the aid of the Secretary to the Government and the Secretary to the Department of the Taoiseach. Thus the Irish Republic provides an example close to maximum of Weller's model of prime ministerial control.

In Sweden the cabinet agenda-setting is of a different character. The Swedish cabinet makes formal decisions on 25.000 to 30.000 issues each year, of which only about 1 per cent are discussed in the general meetings.⁴⁹ The main function of this formal cabinet meeting is to approve of decisions which ministers have already taken individually - in the name of the

⁴⁵ Farrell 1993, p. 176.

⁴⁶ Ibid. See also idem 1988, p. 40.

⁴⁷ Idem 1993, p. 173. In his article on the Irish cabinet in 1988, Farrell estimated the number of items on the agenda to range from 10 to 50 (idem 1988, p. 40).

⁴⁸ Farrell 1993, p. 172.

⁴⁹ Larsson 1988, p. 210.

cabinet as a whole.⁵⁰ Every cabinet *minister* and *ministry* will in advance provide a partial agenda for the cabinet meeting, and only the title or a short summary of the question being raised is mentioned in the agenda. If a minister wishes to raise a question in cabinet, he/she must inform the prime minister, or the prime minister's office, well in advance. The agenda has more the character of a formal information aggregate, and the premier's theoretical possibilities to mould this are restricted since the cabinet meeting often is the very last and only formal place where the question is raised.

In Denmark the agenda is prepared by the prime minister's department. However, the Danish agenda is of a consensual and informal character. It is not uncommon for the prime minister to take on extra items on to the agenda. Worre describes the agenda as "... *en dagsorden med notater om viktigare punkter...* ",⁵¹ i.e. an agenda 'which mentions the more important points'. This is thus a very different agenda practice in comparison to the Swedish system. However, in Denmark the prime minister plays a pivotal role in determining the business of the cabinet. The premier has considerable opportunities to organise cabinet proceedings in a way that suits him best. Because of this informality and lack of guiding principles, Schou has accounted for a considerable variance in the style and role of the premier in cabinet.⁵²

In none of the four systems have ministers the prerogative of demanding a question should be discussed in full cabinet.⁵³

⁵⁰ Ibid., p. 202.

⁵¹ Worre 1982, p. 105.

⁵² Schou 1988, pp. 176-180.

⁵³ See also Thiébault 1993, p. 82.

5.3.3 Cabinet Decision-Making

"The reasons why there is so much controversy about the nature of decision-making in cabinet government is clear: if the principles of cabinet government were applied to the letter, the system would not merely be grossly inefficient, but truly not viable."

J. Blondel 1988⁵⁴

Cabinet decision-making lies at the core of political science; it ultimately creates the national policy outlines. As Blondel stated in 1988, studies of cabinet decision-making were for a long time inconclusive and quantitatively insignificant.⁵⁵ The introduction to this study touched upon the multiplicity of reasons: cabinet decision-making is seldom documented in minutes; in most political systems the specific procedures and votes on issues are left in a haze of secrecy. A main line of argumentation in Western Europe has in the 1980-1990s consisted of attempts to prove cabinet decision-making has been sliding in a presidential direction, enhancing the role of the prime minister as *the* decision-maker and, subsequently, devaluing the role of the rest of the cabinet. Another notable stream of research has been occupied with demonstrating the existence of 'inner cabinets', thus focusing the power of making the important decisions and the policy guidelines in the hands of a few powerful ministers, most notably a *troika* comprising the prime minister, the minister of finance and the minister of foreign affairs.⁵⁶ To follow up that line of thought one should ask whether these key ministers are competitors or cooperators with one another?⁵⁷ Larsson (1993) has touched upon the subject and concludes that there are many more relevant dimensions of possible tensions than between the premier and the other key ministers, most notably the minister of finance. He provides data for the extent to which the prime minister is seen as the most influential in economic matters. The figures for Britain speak their own language: 98 per cent of the interviewed judged the British premier to be the most influential, the figure for the Irish

⁵⁴ Blondel 1988a, p. 4.

⁵⁵ Ibid.

⁵⁶ E.g. Larsson discusses the crucial role of the minister of finance to the extent of 'a new dual leadership' in Larsson 1993.

⁵⁷ See *ibid.*

Republic was only 61 per cent followed by a low 39 per cent in Denmark. Unfortunately there were no figures available for Sweden in Larsson's study - but all indicators point to an influential Swedish Minister of Finance.⁵⁸

The introduction to this chapter dealt with the fundamental presumptions of this analysis with specific references to cabinet decision-making. In *Governing Together* strong evidence for links between the cabinet structures and decision-making was found, at the expense of the influence of the single-party/coalition- and political-colour distinctions. There are, however, various ways of approaching cabinet decision-making. A different and more uncommon approach is offered by Blondel.⁵⁹ He argues that a vital dimension of the cabinet decision-making is the cabinet's *policy-level*, i.e. the level at which issues are dealt with in the cabinet. The cabinet, as the ultimate decision-making body, is likely to discuss issues at a so-called 'middle-level',⁶⁰ i.e. the questions are neither so fundamental that ideologies are brought in, nor do the questions involve detail.

MAKING THE DECISIONS

Voting in Full Cabinet:

The British cabinet does not normally vote on issues. There have, however, been votes on 'minor' subjects on the agenda.⁶¹ The prime minister's task is to sum up the discussion and take it to a decision. On most occasions only a few ministers are involved in each specific question. Votes are also seldom taken in the Irish cabinet. If there is a vote it usually concerns less important issues and any such vote is not recorded in the cabinet minutes.⁶² However,

⁵⁸ Idem., see, e.g., table 9.4 on p. 219.

⁵⁹ Blondel 1988b, p. 8.

⁶⁰ Ibid.

⁶¹ Burch 1988, p. 22. See also Mackintosh 1977.

⁶² Farrell 1993, p. 176.

in comparison with Britain voting is more usual on minor issues. Neither is any ministerial dissent recorded in the minutes; decisions tend to be of a consensual character - as a result of the strict interpretation of cabinet collectivity.

In Sweden voting in the cabinet is uncommon and is not recorded in cabinet minutes. The institutionalised informal cabinet 'lunch meeting' acts a preparatory meeting for discussion at cabinet level. In Denmark decisions in cabinet are required to be reached through (at least formal) consensus. There is no record of voting. In case of conflicting interests between departments, the usual solution is for the prime minister to submit the issue to his department for drawing up a settlement. Only in cases where no consensus can be achieved at the end of the day, the prime minister's word will be decisive. The Irish situation, where the prime minister can successfully oppose the views of his ministers, is unthinkable in Denmark (see below). The consensual character of decision-making is likely to have evolved as a necessity in the Danish political climate, with frequent minority coalition governments.⁶³ This introduction to the theme requires further analysis.

A Prime Ministerial Veto?

There is no clear consensus in the literature on the ultimate role of the British prime minister; does the prime minister have a 'veto' over questions in cabinet, by not only having the last say on questions which eventually divide the cabinet, but also by being able to go against the will of a substantial number of cabinet ministers over certain questions.

In the Irish Republic the role of the prime minister in cabinet is influential, since he/she in practice has a possibility to veto ministers' opinions: "*specific opposition by the Taoiseach acts as a veto.*".⁶⁴ More typically, a minister whose proposal meets resistance in cabinet requires the consent of the Taoiseach to be successful. There are other means of prime

⁶³ Cp. Schou 1988, pp. 180-181.

⁶⁴ Ibid., p. 177.

ministerial control: if consent is impossible to achieve on a certain matter, and the Taoiseach does not express an explicit view, the matter may be deferred - even indefinitely.⁶⁵

In Sweden decisions taken in the formal type of cabinet meeting, in the general meeting, are consensual. In Swedish post-1945 politics it is hard to find any evidence of the prime minister acting as more than a chairman in the cabinet. There is no recorded evidence of the prime minister acting against the will of other cabinet ministers. This consensual character has several causes. Swedish ministers stay comparatively long on their post and thus usually acquire a thorough knowledge of the field, which makes the role of the premier less pronounced. The informal 'lunch cabinet meeting' on weekdays has also acted as a unique forum of preparation for formal cabinet decisions. Furthermore, the Swedish arrangement with institutionalised informal cabinet meetings decrease the possibilities of dealing with issues outside the cabinet. This division has also lead to a situation, where no minutes are taken in the Swedish general cabinet meeting since it predominantly acts as a rubber-stamp for ministerial decisions.

In Denmark cabinet decision-making is equally consensual and the premier has not had opportunities to impose a decision against the will of the concerned minister. The level of discussion in the Danish full cabinet appears to be higher than in the other three systems, although the quantity of discussion to a large extent can be decided by the incumbent premier. The Danish cabinet does not have a tradition of informal meetings, as in Sweden.

These generalisations about cabinet life are subject to a variation depending on whether the governments are single-party or a coalition. In the Irish Republic, an influential prime ministerial role, probably more pronounced than in Britain, has evolved for historical reasons and long-time undisputed leadership (still best exemplified by De Valera) despite both single-party and coalition cabinets. In Sweden, a consensual model has evolved despite long-time one-party governments - particularly because of a low rotation of ministerial posts.

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⁶⁵ Ibid.

The cabinet meeting has two central functions. It is the highest body of political decision-making and thus legitimises (or ratifies) decisions prepared or taken elsewhere. Second, in the words of Blondel, it acts as a *court of appeal* - providing occasional opportunities for members to air their dissatisfactions about the way matters have been handled by a smaller grouping.⁶⁶ *"This does mean that there is a degree of 'collegiality', but one which is of a negative character and is more concerned with stopping a proposal than allowing an open-ended discussion."*⁶⁷ A characteristic of the Danish system is an informal cabinet meeting tradition, where discussions are possible. However, there are a number of reasons for not elaborating issues in full cabinet. The autonomy ministers enjoy in their policy field restricts a serious debate. The cabinet as a debate forum is less suitable, as ministers, especially if going beyond their own policy-domain, usually like to be briefed by their advisors. Given the number of decisions taken by full cabinets, a further examination of the level of 'discussion' in the cabinet seems unhelpful. *Summa summarum* there is very little true deliberation even in the Danish cabinet.

Most issues are always discussed in other fora, the question is only *where*. Here a Nordic comparison is interesting: the institutionalised Swedish lunch meetings provide opportunities for the premier, as well as for other ministers, to stay on top of the issues in a way unknown to the Danish system. Neither the Swedish nor the Danish premier has opportunities to act as more than a chairman in the formal full cabinet.

What general conclusions can one draw from the descriptions above? Generally there seems to be little genuine discussion in full cabinet. Especially in the Swedish full cabinet, discussions seem impossible in the light of the vast number of decisions formally reached in the meeting per calendar year (25.000-30.000 decisions). There is also little or no voting in all four cabinet meetings. In Britain, Sweden and especially Denmark, voting is virtually non-existent. In all four systems the prime minister sums up the deliberations in cabinet and formulates the decision (most often orally). If taken at all, cabinet minutes are very general

⁶⁶ Blondel 1988b, p. 26.

⁶⁷ Ibid.

and often for informal use only (in Britain minutes provide the orders for ministers and their departments).

Generally there are few formal rules about the cabinet - in Britain and Ireland ministerial guidelines exist (which were for a long time kept secret). Together with facts like the low level of record from cabinet meetings, this allows a certain prime ministerial discretion. This discretion is likely to be beneficial for the prime minister as there are few, if any, signs of the cabinet being able to influence 'the flow of business' as a collective. Before looking at the role of cabinet committees, the only institutional aspect that clearly elevates the prime minister to a position above the *primus inter pares* is the Irish premier's practical possibility of vetoing decisions.

Even with few formal signs of influence, the key role of the prime minister in cabinet seems to lie in an active capacity at certain crucial and conjunctural points. The prime minister is instrumental in all systems, in drawing up the cabinet agenda. The premier's capacity as chairman and mediator often turns from passive to active when a conflict between two or more other cabinet members occurs. The premier is able to decide on whether decisions should be referred to a cabinet committee, and can even decide to set up a committee *ad hoc* (questions which will be dealt with below).

The lesson of the single-party- versus coalition-distinction is that the 'power' of the chairman often derives more from the fact that the rest of the executive is unable to play any coordinating or collective role, rather than deriving from any formal 'powers' vested in the chairman. Several studies in cabinet decision-making have been looking for rules or trends that either clearly magnify or restrict the competence of a certain actor, most notably the prime minister. However, such rules are contrary to the general elusive character of cabinet decision-making. More importantly and reversely, there is a lack of restrictions and this lack in practice seems to translate into prime ministerial opportunities.

5.3.3.1 The Prime Minister and Cabinet Committees

As a part of the comparative understanding of the premier's position in cabinet decision-making, the study has to be extended beyond the full cabinet, to an examination of the whole cabinet system. Especially since Mackie & Hogwood's *Unlocking the Cabinet*, cabinet structures have been an inherent part of the Anglo-Saxon examination of cabinet decision-making.⁶⁸ Like many other institutional features in the national core of decision-making, the broader cabinet structure, the cabinet system, can support or undermine the pre-eminence of the prime minister. A central determinant is the creation of and appointments to cabinet committees, which often are directly linked to the premiership. The role the committees play matters because cabinet committees are the most visible indicator of the existence of different forms and even *fora* for executive decision-making.⁶⁹ In the words of Dunleavy the cabinet committees form the perhaps most central and least documented part of the modern core executive.⁷⁰ The use of cabinet committees in the process of policy-making is, despite any endorsement of government overload theses, not an old nor an obvious solution.⁷¹ In Denmark the cabinet committee system to a large extent was a creation of the late 1960s.

Cabinet committees can fulfil a variety of tasks. Based roughly on Mackie & Hogwood, one can point to the following functions:

- policy planning
- mutual control
- policy implementation
- cabinet relief
- inner cabinet
- symbolic action

⁶⁸ Mackie & Hogwood (eds.) 1985. See also Hennessy 1986 and Weller 1985, 1991.

⁶⁹ Mackie & Hogwood examine seven different decision-making *arenas* in *ibid.* 1985, pp. 2-10.

⁷⁰ Dunleavy 1995, p. 298.

⁷¹ *Ibid.*

The basic reason behind a committee structure is to reduce the decision-making burden of the full cabinet. There is only one principal way to decrease the number of decisions the cabinet has to reach, and that is delegation. The question is *to whom*. There are two main channels for the delegation of issues the prime minister can utilize: to delegate issues to the minister or ministry (in practice to a junior minister), or to delegate the issue to a committee (or even to set up one from scratch). The latter has the advantage of enabling the premier a far-reaching control over the issue, should he/she wish so. On the other hand, if the premier is in a position to choose between options, the delegation of an issue to a ministry enhances its autonomy and, potentially, spreads the information before a decision has been reached. Another important function cabinet committees perform is co-ordination (horizontal, vertical or both) between different parts of the government. As with the decision-making *in* committees there are again two principal options. The committee can be assigned to prepare an issue for presentation in full cabinet, or have the authority to reach a decision endorsed by the cabinet. In both cases the viewpoints of the committee are unlikely to be challenged, and least of all altered. In close connection to this division one can see cabinet committees as having political and functional roles, which often overlap.⁷² The existence of a committee structure is a way of extending the agenda-setting influence of the premier. Issues can be brought up in full cabinet or hidden in cabinet committees. Apart from size and structure (ministerial standing committees, subcommittees and *ad hoc* committees), Grønnegård Christensen distinguishes between four kinds of committees depending on policy scope:

- committees responsible for general government co-ordination,
- committees responsible for narrower sector co-ordination,
- committees designed specifically for 'trouble-shooting'
- committees that handle specific cases so sensitive they can be entrusted neither to the civil servants of the ministry in question nor to its minister.⁷³

⁷² Weller 1985, pp. 115-116.

⁷³ Grønnegård Christensen 1985, pp. 120-121.

Under all circumstances the role of the committee chairman is crucial. It is unusual for cabinet committees to vote, which emphasises the role of the chairman as the person who sums up the debate and presents the deliberations to the full cabinet or other bodies. The prime minister might himself/herself chair a committee or appoint a person close to him/her to the job. At least in Britain it has not been unusual for the premier to chair important committees. Mrs Thatcher personally chaired at least 14 out of 38 cabinet committees between the years 1979 and 1985.⁷⁴ According to the situation in 1992 the British premier personally chaired nine out of 16 committees (excludes subcommittees).⁷⁵ It is indeed difficult for individual ministers to reopen in full cabinet a question referred to a cabinet committee for decision (argued especially in the UK). Without the backing of the prime minister a decision might be very hard to reverse. One could also express it the other way around: a cabinet committee decision which satisfies the axis cabinet chairman-prime minister is indeed hard to shift:

"However, in cabinet systems like Britain... matters resolved in cabinet committees cannot normally be reopened in full cabinet. In Britain they will not even be placed on the cabinet agenda. The full cabinet may simply not have the opportunity to reject or refer back or amend such decisions."⁷⁶

Only on highly controversial or multifaceted issues the full cabinet might function as the body that takes a final decision on an issue earlier referred to a cabinet committee. As Weller remarks, the decisions on whether or not appeals to full cabinet will be allowed are also in prime ministerial hands.⁷⁷ Thus there is reason to see the establishment of a cabinet committee structure as a substantial extension of the prime minister's influence in Britain.⁷⁸

⁷⁴ Mackie & Hogwood 1985, pp. 39-43. For the membership of three typical cabinet committees, see p. 44 (table 4.3).

⁷⁵ Dunleavy 1995, p. 305 (table 13.1).

⁷⁶ Ibid., p. 10. The one constitutional exception in Britain is the rule that the Treasury cannot be overruled by a committee. If the decision does not please the Treasury, it will be referred to the full cabinet (Weller 1985, p. 121; Pliatsky 1982, p. 140).

⁷⁷ Weller 1985, pp. 114-115.

⁷⁸ Cp. Burch 1983, pp. 411-412.

Dunleavy is probably the first academic that has quantified the importance of the cabinet committees and the players in the committee game. In his study of Britain the premier was the core of influence with a weighted score far ahead of any other cabinet ministers.⁷⁹ Based on coalition game theory he declared that the premier's influence is likely to be even more important than his weighted scores would presuppose as the other players' costs of organising prevent them from exercising their formally assigned influence.⁸⁰ The same article also compares the influence over time, 1984 against 1992, from which one can conclude that the premier's nominal role as a single player (measure: committee chairs) has become even more important.⁸¹ The British discussion on cabinet committees has to a great extent been dominated by the question of the committees' secrecy, which, as another factor, has added to the picture of the premier's extended influence through a committee structure. In a memorandum to his ministers, prime minister Callaghan declared that information *about* the committees could be 'misleading or counterproductive'.⁸² Since 1992, however, information about the British committee structure has been made more accessible.

A Contrasting Comparative View

From a comparative perspective the role of cabinet committees, especially the influence-enhancing characteristics, seem less obvious. Denmark represents a consensual tradition of cabinet committees which in many cases is the absolute opposite of the British tradition. The important chairmanship is, by tradition, always given to the minister in charge of the concerned policy-area, which is a rational extension of the ministerial autonomy enjoyed by Danish cabinet ministers. Neither the prime minister nor the two ministers with clearly interdepartmental responsibilities (the Minister of Finance, the Minister of Economic Policy)

⁷⁹ Dunleavy 1995, p. 308-309. See also figure 13.1 on p. 311.

⁸⁰ Ibid., p. 319.

⁸¹ Ibid., p. 320. Dunleavy mentions the Westland affair as a concrete example of outcomes linked to the structural arrangements.

⁸² Weller 1985, p. 115. See also Dunleavy 1995.

chair committees.⁸³ The only committee the Danish premier chairs is the committee preparing EU summits. The prime minister is, however, a member of a number of committees. According to Grønnegård Christensen's information, the premier had a seat in 10 out of 14 cabinet committees during the period 1982-1985.⁸⁴

Furthermore, prominent committee membership is in Denmark used as a form of compensation for minor coalition parties for not receiving any central ministerial portfolios. A third key feature of the Danish committee system is its role as a means of achieving co-ordination between the relatively independent ministries: *"It was not until the late 1960s that cabinet committees were introduced as a general instrument of interdepartmental coordination."*⁸⁵

The two binary blocks of this study are opposed over the role of cabinet committees. In Britain cabinet committees have been seen as a pivotal but relatively secret garden of decision-processing and making.⁸⁶ The role of cabinet committees in the Irish Republic has been the reverse. Farrell writes that: *"In particular, there has been no development of a cabinet committee system, nor any extension of the powers of junior ministers, either of which might be expected to reduce the burden of cabinet decision-making."*⁸⁷

In the Scandinavian systems the Swedish cabinet has used entirely other means of decision-sifting, whereas the Danish cabinet to an increasing extent has been creating a cabinet committee structure. In Sweden a substantial part of the process of policy-making is carried out outside the relatively small ministries, in boards, agencies and royal commissions (which prepare government bills). These bodies work under guidelines from the cabinet or the ministries, but are relatively independent. They seem to have minimised the need for a cabinet

⁸³ Grønnegård Christensen 1985, pp. 124-125.

⁸⁴ For detailed quantitative information on the Danish cabinet committees, see tables 7.1-7.3 in *ibid*.

⁸⁵ Grønnegård Christensen 1985, p. 120.

⁸⁶ *Ibid*, pp. 36-60.

⁸⁷ Farrell 1994, p. 173.

committee structure.⁸⁸ There are a number of inter-ministerial committees, but below the cabinet level. The only exception to the rule of non-existent cabinet committees was the Social Democratic 'corporatist' *troikas* [group of three] that existed in the 1970s. This group included the Minister of Finance, the Minister of Industry and the Minister of Labour together with their under-secretaries and the heads of the National Labour Market Board (thus excluding the premier). According to Larsson, this group was not resuscitated after the return to power of the Social Democrats in 1982.⁸⁹ However, the Social Democrats have set up some cabinet committees in the late 1980s, something which the centre-right government 1991-1994 did not practice.⁹⁰ The function of co-ordination that cabinet committees fulfil in Denmark is hence catered for by other means in Sweden. One way of achieving co-ordination is the so-called *delningsförfarandet* ('procedure of sharing'), whereby an extensive range of government papers (answers to parliamentary questions, royal commission directives etc.) are distributed to other ministers and ministries. Before the issue can be taken further, the other ministries have to give their approval.⁹¹

There is a multitude of different functions that cabinet committees can fulfil in cabinet systems. Not only are there different cabinet committee traditions, but some very different systems like the Irish Republic and Sweden lack the tradition of cabinet systems. There are more differences than there are similarities, but yet, where a cabinet committee structure exists, it has to be examined and can be expected to be an extension of the prime minister's influence. When it comes to the cabinet system and the executive decision-making in a broader sense, it is hard to imagine a system where the extra-cabinet arrangements, like cabinet committees, would work explicitly against the premier's influence. Jones, however, sees the British committee structure as being a functional betterment of the bounded cabinet

⁸⁸ See, e.g., Larsson 1988, pp. 198-199.

⁸⁹ Ibid., p. 206.

⁹⁰ Idem 1994, p. 174.

⁹¹ See, e.g., Vinde & Petri 1978 and Larsson 1988, 1994.

government.⁹² As for cabinet and *ad hoc* committees Jones stresses the influential role of the minister with a departmental interest in the subject which happens to be under consideration thus emphasising the *functional* element rather than the premier's influence *potential*.

If the premier enjoys a strong position in the cabinet, in Sartori's terms a *first above unequals*,⁹³ a committee structure is likely to be a continuation, or even extension, of that influence - not vice versa. If the premier, on the other hand, enjoys a more neutral status in the cabinet, a Sartorian *first among equals*,⁹⁴ then any cabinet committee structure is likely to have more purely functional properties (mutual control, co-ordination, planning etc.), as in the case of Denmark. To conclude in the light of the systems concerned, in institutional terms the role of a committee structure ranges from neutral to, more frequently, proactive for the premier, providing opportunities to wield power.

5.3.4 The Recomposition of Cabinets: Four Systems

The reshuffle, or recomposition, of cabinets has been given little scholarly attention. Comparative work on recompositions includes a paper by Budge and a thorough appendix in Budge & Keman 1990 (pp. 208-212). The British case has been dealt with from different angles, however by one team - Alderman & Cross in articles published in 1985, 1986, 1987, and by Alderman & Carter in 1992. In this study the preferred expression is *cabinet recomposition*, as the frequent expressions 'cabinet reshuffle' or 'cabinet reorganization' could be perceived as encompassing primarily internal recomposition of the cabinet portfolios. A cabinet recomposition can be more than a reshuffle of the portfolios - and usually has been in the four systems this study deals with.

⁹² Jones 1989, especially pp. 243-245. One can argue that the premier's position in this cabinet government already is more eminent than in other systems.

⁹³ Sartori 1994, p. 102.

⁹⁴ Ibid.

For an analysis explicitly of the office of prime minister, the role of cabinet recompositions becomes all the more vital. This emphasis has several reasons. To the extent a tradition of cabinet recomposition exists, it is a political instrument confined to the prime minister, most often to the prime minister only. The role of the instrument as a means of expressing the prime minister's freedom of action is clear: it is as difficult indeed to envisage a recomposition to be anything else than prime ministerial as it is to imagine it being entirely consensual. A consensual rotation of cabinet posts, of which the Swiss system is a lonely example, is a viable prospect, but has few applications under normal conditions and contradicts large parts of modern coalition theory.⁹⁵ In a single-party cabinet, a consensual rotation, as opposed to recompositions as an instrument in the hands of the premier, could fulfil a function of distributing political dividends more evenly between a large and fractionalised ruling party. An example of this rotation-like relocation of cabinet portfolios is the frequent relocation in the long-time LDP-cabinets in post-World War II Japan. Under normal political circumstances, however, a characteristic feature of cabinet recompositions is the direct linkage to the office of prime minister. Even in the Scandinavian systems, cabinet recompositions are referred to as 'the prime minister's recomposition'. A recomposition of the cabinet can, as an instrument in the hands of the premier, be paralleled to the tangible instrument of dissolution of parliament. The effects of a recomposition can be very substantial, as Macmillan and Thatcher have showed in Britain. Yet, the significance of the recomposition instrument lies in its being as effective an instrument as it is undramatic, when carried out carefully.⁹⁶ To analyze recompositions is also essential since it potentially could be one of the 'customary political means' of exercising prime ministerial influence, which the constitution, in its strict legal sense, does not establish. The original right to appoint the fellow ministers has in the Westminster context developed into a chronic occurrence which bears implications on both the structure and composition of the national executive.

The definition of a cabinet recomposition is a more complex issue than it looks at first glance. Budge and Keman (and, implicitly, Alderman) adhere to a definition of cabinet 'reshuffles'

⁹⁵ See Budge & Keman 1990, pp. 208-212.

⁹⁶ See Alderman & Carter 1992.

as being: "*the simultaneous movement or replacement of two or more Cabinet Ministers*".⁹⁷ The reason for drawing the line at 'two or more ministers' is that a single minister might resign from the cabinet for entirely personal reasons, which should not form a part of a sustainable definition of a cabinet recomposition. When one analyzes post-1945 recompositions of cabinets in the four systems, the majority of the recompositions are two-three portfolio relocations initiated by the resignation of one particular minister. There is a domino-effect involved in the resignation of a minister which complicates the definition of what a recomposition actually is. When one minister resigns, most often another minister is allocated the resigned minister's portfolio ('an upgrading') and consequently another minister is allocated the portfolio of the minister who changed to another ministry etc. Often both cabinet and junior ministers are involved in a recomposition that takes place because of a single resignation. This domino-effect is most transparent in single-party cabinets. There are, however, arguments in favour of the two-minister-definition: it is in many cases possible to make one single substitution for the resigned minister, especially in coalitions, and thus, theoretically, anything beyond that replacement represents a conscious decision (by the premier) to make more changes in the cabinet than would be strictly necessary. Usually recompositions are easier for the premier to carry out when a formal reason, like the resignation of a minister, is at hand. Thus the definition of the instrument used for the analysis in the UK, Irish Republic, Sweden and Denmark is *a recomposition of the cabinet, which simultaneously involves at least two portfolios*.⁹⁸ In that way some categories of cabinet recompositions that are likely to escape the definition of Budge and Keman are catered for. For instance, it is possible for the prime minister to emphasise a certain policy-field (and de-emphasise others) by dividing ministries into two posts, i.e. by enlarging the cabinet. Such a shift does not necessarily involve the 'simultaneous movement or replacement of two or more ministers'. If ministries are merged, however, it usually means that one minister has to be relocated.

⁹⁷ Budge & Keman 1990, p. 208.

⁹⁸ The indexed source of the analysis undertaken here are the chronological volumes of Keesing's Record of World Events.

A cabinet recombination therefore has dimensions of both form and function. Functionally a recombination can be an internal relocation of portfolios, a rotation before ministers 'go native',⁹⁹ or it can imply a change, the removal of cabinet ministers, which under most circumstances is likely to lead to the concurrent appointment of entirely new cabinet ministers. Structurally the cabinet can remain in *status quo*, or there can be a change. A structural change can be facilitated in two principal ways: either by splitting existing ministries or, more unusually, by creating or abolishing units wholesale. Especially after World War II there were a number of changes of departmental status in the British reorganisation of cabinets by Churchill. The premier was able to decide *in casu* whether certain ministers who today enjoy an apparent cabinet status should enjoy that status at all, as the inner circle around the premier was able to merge or split ministries. These structural features today tend to be processes too large to be attributed to only short-term political goals of premiers or cabinets. This study focuses on recombination of the *cabinet* portfolios. Especially in a Westminster context the premier has the opportunity to carry out extensive governmental reorganisations without making changes in the cabinet itself - a move which, however, is likely to influence the cabinet by persuading cabinet ministers to stay in the prime ministerial fold (this tactic was one of a variety Mrs Thatcher used, further examples of which occurred in October-November 1956 and in 1971).

A recombination can be considered a political tool from three main points of view:

- 1) *Office-preservation*, i.e. to enhance or, at least, keep the position of *the premier* at *status quo*.
- 2) *Policy-pursuit*, i.e. a policy-related reason for a recombination.¹⁰⁰
(For example a division of the Foreign Office because of EEC membership.)
- 3) *'Personnel management'*, a functional reason which relates to neutral reasons for recombinations, for example the death or illness of a cabinet minister.

⁹⁹ For non-British readers this refers to ministers that put the departmental before political preferences.

¹⁰⁰ See also Alderman & Cross 1987, p. 1.

As with most cabinet-related concepts, several or all these functions are likely to be intertwined, however with the origin in and emphasis on one of the aspects. A recomposition is the result of a multitude of other factors that have to be taken into consideration by the premier. There are arguments in favour of ministers spending a considerable period of time in a particular office (expertise) and in favour of a relatively brief ministerial tenure (management of rivals).¹⁰¹ The resulting recomposition should be the careful weighing of timing, magnitude, public relations and purely administrative aspects.¹⁰² Yet recompositions are often triggered by sudden turns of events:

"The problems are compounded by frequent, unforeseen, 'accidental' factors of death, resignation and so on, which severely limit the Prime Minister's freedom of manoeuvre. A high degree of incrementalism, rather than rational planning, is the leading feature of reshuffle timing."¹⁰³

The taxonomy above can be of value when it is related to specific political systems, which makes it possible to conceive that cabinet recompositions have different reasons in different systems. The problem with analyzing cabinet recompositions is they (intuitively) are very closely linked to a number of other features of the political system. The most important is the borderline area between i) the premier's right to dismiss ministers and ii) cabinet recompositions. As for the British case Alderman & Cross have argued that dismissals never can be an isolated act ("to dismiss a minister produces a vacancy which it might take a good deal of reshuffling to fill").¹⁰⁴ Theoretically, however, there has to be a distinction between the dismissal of a cabinet minister and a reorganisation of the cabinet. A recomposition does not necessarily entail a dismissal, whereas a dismissal at least entails that a vacancy has to be filled. Especially if the dismissed minister held a senior cabinet post (which, on the other hand is less likely), a recomposition is likely to occur as a chain reaction.

¹⁰¹ For a further elaboration of the arguments, see *ibid.*, pp. 2-4.

¹⁰² Alderman & Cross deal with the aspects of ministerial age and the need to rejuvenate the British cabinet, *ibid.* 1986.

¹⁰³ Alderman & Cross 1987, p. 18.

¹⁰⁴ *Idem* 1985, p. 390.

There are also other factors closely linked to recompositions: the single-party/coalition distinction and, when looking at the phenomenon *ex post*, the cabinet's duration. A political system which tends to have short-lived cabinets is less likely to experience cabinet recompositions for reasons other than 'personnel management' reasons. Budge and Keman make two explicit general assumptions about the turnover of cabinet personnel in their 'integrated theory of democratic party government':¹⁰⁵

- 1) Recompositions are more frequent and the turnover of individuals in ministries is greater where the premier has more freedom of action, and declines as the premier has less freedom of action over
 - 1.1 other ministries
 - 1.2 party factions
 - 1.3 coalition parties in government
- 2) Recompositions will therefore be more frequent in single-party governments than in coalitions.

On the next page the results of an analysis of post-1945 recompositions in the UK, the Irish Republic, Sweden and Denmark is presented. However, some recomposition features require a brief explanation. For example, on several occasions the premier has personally taken over the responsibilities of a ministry, after the departure of the minister in charge. In Denmark, the premier took care of the Foreign Office in 1966-1967 and, at the same time, prime minister Wilson of Britain led the Department of Economic Affairs. In 1976 the premier of the Irish Republic simultaneously acted as Minister of Defence. Another opportunity to make favourable structural changes to the cabinet with a minimum of structural and functional problems (and pleasing factions or coalition partners) is to create ministers without portfolios. In 1969 the Swedish cabinet had no less than six ministers without portfolios (a Social Democratic single-party cabinet). Yet another difficult question is whether cabinet changes after a general election are recompositions? In this study all recompositions that have a very

¹⁰⁵ Ibid., see especially chapter two and pp. 50-51.

clear linkage to a general election have been disregarded, since the recomposition as a political instrument is a means to create changes in an existing cabinet.

Table 11. CABINET RECOMPOSITIONS 1947-1990

The simultaneous movement or replacement of two or more ministers in a cabinet.

| | | A | B | A / B = | REFERENCE: The cabinet duration |
|--------------|---|-----------|-----------|----------------|---------------------------------------|
| | | Recompos. | Cabinets | Recompos. | |
| | | Total no. | Total no. | per cabin. | |
| U K | S | 44 | 18 | 2.44 | 2.50 |
| | C | 0 | 0 | 0 | |
| I R E | S | 11 | 12 | 0.92 | 2.50 |
| | C | 3 | 6 | 0.50 | |
| S W E | S | 10 | 16 | 0.63 | 1.96 |
| | C | 3 | 7 | 0.43 | |
| D E N | S | 4 | 8 | 0.50 | 1.66 |
| | C | 12 | 19 | 0.63 | |
| | | 87 | 86 | (0.76) | (2.16) |

Sources: EJPR vol 24/no 1, Keesing's Contemporary Archives (var. years)

Explanation:

S = Single-party cabinets

C = Coalition cabinets

The time period was chosen on the basis of available comparable material.

Recompositions Compared: Conclusions

In Britain it is relevant to speak of a recomposition instrument. Recompositions are likely to occur, masterminded by the *primus solus* - the prime minister. From 1945 there has never been a period longer than two calendar years without cabinet recompositions. Twelve times there have been two or three recompositions during the same calendar year. There is evidence to suggest that British recompositions have been initiated by office-preservation (category a). In comparison to the Irish Republic, the recomposition frequency is more than double. One also has to take into consideration the similar average duration of cabinets in Britain and the Irish Republic (the table's reference column). If one were not to make a distinction between single-party and coalition cabinets, recompositions take place as frequently in the two Scandinavian systems as in the Irish Republic, but the major difference between the recomposition tendencies in Irish single-party and coalition governments delivers a more diverse picture. If the propensity of a recomposition in a certain system is high in single-party governments and low in coalitions, recompositions probably are an indicator of the premier's freedom of action (in accordance with Budge & Keman's postulates cited earlier). In all four systems recompositions occur evenly over time, which means that they have less to do with the reigns of specific prime ministers. The only clear exception is the British 1980's, during which an increased amount of hiring and firing to the cabinet was experienced under Mrs Thatcher.

The two Scandinavian systems illustrate a different tradition where recompositions are exceptions to the rule rather than the rule. Statistically a cabinet recomposition has occurred every 3.5 years in Sweden, and is likely to have been caused by the resignation of a cabinet minister, which leaves very little prime ministerial freedom of manoeuvre. In Denmark recompositions of coalitions are more frequent than in single-party governments. This situation constitutes a deviant case (see the theses by Budge & Keman). The validity of the Danish case is enhanced by comparable figures calculated from Budge & Keman 1990 (p. 209). Based on their survey of 'reshuffles between the years 1946-1984', the difference between Danish recompositions of single versus coalition cabinets is considerably bigger than in the table

above.¹⁰⁶ One sustainable explanation for the Danish case is that single-party cabinets have been minority governments, which makes any recomposition of the cabinet, and its fragile support in parliament, less likely (at least at the will of the premier). Or, on the other hand, the occurring recompositions of Danish coalitions might be of a policy-pursuit character (category b) and can thus be facilitated since they suit the coalition's agenda. The two dimensions single-party vs. coalition, minority vs. majority combined with a low vs. high frequency of recompositions leave minimum of space for recompositions as an instrument for *office-preservation* in Denmark. If parliamentary support is an important variable, it implies that *structural* recompositions are practically excluded for all other reasons than policy-pursuit in Denmark.

Recompositions in the form of the simultaneous change of two or more portfolios occur in all four systems. Recompositions are included both structural and personal elements in all systems, with a clear emphasis on the latter. However, there is an essential conclusion for the office of prime minister: there seems to be a clear difference between recompositions of a *proactive* and *reactive* character from the premier's perspective. In the British system cabinet recompositions have been an explicitly proactive measure - even a precautionary instrument for office-preservation. In a number of cases the premier did not like senior ministers to be too comfortable in their seats. Expressed differently, the frequencies above show that the British system is the only one in which the restructuring of the cabinet *de facto* is an ordinary means of enhancing the authority of the premier. The average likelihood of a recomposition per cabinet is larger than 1.0 in Britain. The difference between the Irish Republic and the UK is that the former experiences coalition cabinets, which makes the position of the premier different in the Irish Republic, depending on whether the cabinet is a single-party or coalition cabinet.

¹⁰⁶ The rate of recompositions per Danish single-party cabinets for this period is 0.33 as opposed to 0.64 recompositions per each coalition cabinet. These data are also based on Keesing's Contemporary Archives.

This reasoning can be strengthened by looking at the opposite situation. If recompositions would be less likely to occur in majority single-party cabinets, that would have to be an indicator of a limited freedom of action of the premier within his/her party (also the premier tends to be the effective party leader, which contributes to exclude the possibility that another body within the party would ordain the recompositions). Another dimension is the *recomposition magnitude*, in other words how encompassing the changes are within the cabinet (Alderman & Cross called this '*the scale of the reshuffle*',¹⁰⁷). In this study recomposition magnitude was measured as the number of cabinet portfolios affected by the recomposition. This measure over a longer time leads to a *magnitude profile* of the recompositions in a political system. In the UK the largest number of recompositions accounted for comprised a change of two or three cabinet portfolios, but the profile is nevertheless the most constant one in comparison to the other three systems (in spite of there having been a number of recompositions of all sizes up to the simultaneous change of 11 portfolios in Britain). In the Irish Republic the recomposition emphasis is clearly on the change of two to four ministers, with only occasional but important deviations from that rule.¹⁰⁸ This is also the case in Sweden: the vast majority of the recompositions include a change of two to four seats, with a clear peak at changes of three ministerial chairs -mainly caused by rotation because of resignations. The conclusion is that a small magnitude with the emphasis on a relocation of a few portfolios could be caused mainly by unpredictable individual resignations. However, Denmark yet again unveils an interesting profile with an emphasis on small recompositions, but also provides several examples of larger recompositions of up to 10 cabinet ministers. However, an elaboration of recomposition magnitudes have to be taken only as a thumbnail. The possibility of gradually carrying out an extensive recomposition of the cabinet, through several smaller changes, has to be acknowledged. As Alderman & Cross stated, the magnitude and frequency are likely to be inversely related.¹⁰⁹ Thatcher used a tactics which bear a resemblance to this reasoning. To recompose the cabinet is the means with which especially British prime ministers exercise continuous authority between the general elections. To

¹⁰⁷ Alderman & Cross 1987, p. 4-5.

¹⁰⁸ See also the figures on frequency and scale in *ibid.*, p. 5.

¹⁰⁹ *Ibid.*

exercise power with the help of recompositions is the rule in Britain, less so in Irish single-party cabinets and only exceptions to the rule in Sweden and Denmark.

5.4 Concluding Remarks

This chapter has been concerned with a number of different aspects of the premiership, which have common denominators in being cabinet-internal aspects with a link to the office of prime minister. When separating and comparing these aspects, the aim is to perceive which dimensions that help explain the position of the premier and how. On some dimensions the powers of the premier have proved to be close to exhaustive, like in the case of the cabinet agenda in the Irish Republic; in other cases there seems to be a potential for more prime ministerial influence and in some other cases clear limits to the possible extent of influence (the Danish premier and cabinet decision-making).

The first analysed aspect, the stages of cabinet formation, proved to be a phase when the premier or premier-to-be exercises relatively little influence beyond the possible hand-picking of some ministers and other staff. The rational continuation, and second aspect, the party-internal succession of the national premiership, already pointed in different directions in different systems. A new British party leader-premier has been able to recompose the cabinet at the time of arrival at Number 10 and has not had to 'inherit a full cabinet' as in Denmark (where cabinets have been overtaken without any portfolio changes). On a nominal constitutional level (cp. chapter three) the British and Danish premiers are *on a par* in being able to hire and fire other cabinet ministers. Put into a different collegial practice, the implications of this tool have been very different.

The cabinet meeting proved to be of a very different character in the four systems. The variance is particularly visible on a scale of formal versus informal cabinet meetings. The Westminster block is different from the Scandinavian block in its adherence to cabinet-level deliberations only in a formal cabinet meeting and cabinet committees. Sweden has recognised forms of both formal and informal cabinet meetings, whereas the Danish cabinet meeting is of a more informal character (issues can to some extent be raised and discussed in the cabinet

meeting) than in the other three systems. This degree of formality versus informality can without effort be translated into an equivalent scale of prime ministerial control versus non-control over the rest of the cabinet. A thesis of prime ministerial control is valid if it shares the three characteristics of

- i) a cabinet agenda which is controlled by the prime minister
- ii) decision-making in a cabinet meeting of a formal character
- iii) prime ministerial influence in the cabinet committee structure

Figure 11. THE AGENDA AND DECISION-MAKING: A MATRIX HEURISTIC

| | | PM'S CABINET AGENDA CONTROL | |
|--------------------------------|---------------|---|---|
| | | CONSIDERABLE | MODEST |
| CABINET DECISION- MAKING | FORMAL | Prime ministerial control: UK IRE | Ministries/ ministers dominate (out of cab.): SWE |
| | IN- FORMAL | Ministers influential in cabinet: PM a chairman | Ministerial independence: DEN |

PM = the prime minister

Furthermore, several dimensions directly connected to the premier seem not to have any negative effect on the premier's influence ('power'). They seem to be only able to be neutral or have a potential of being used to the advantage of the premier. Cabinet committees are an example of an executive dimension which seldom decreases the influence of the premier. Theoretically a committee system could be used to prepare or even take decisions without the premier, which there is some limited indication of in Denmark, but in practice a cabinet committee system most often has a neutral function or a clear potential of being used by the premier to enhance the influence (cp. especially the case of Britain in the 1980's). On the other hand, a committee system can have the neutral function of communication and coordination (the principal role of the committees in Denmark). A committee structure, initially created to reduce the decision-making burden of cabinet, can be used to the benefit of the premier on a person- and/or issue-level. The premier can create a committee and even chair it (especially in Britain), or he/she can use a committee system as an issue junkyard. In Britain issues referred to cabinet committees have proved to be very difficult to reopen in the full cabinet (which is an effect of the two earlier dimensions of the cabinet agenda and degree of formality). In the Irish Republic the potential of a cabinet committee structure is unexplored. Because of the very strong position of the Irish premier (identified on the other intra-cabinet dimensions), particularly in cabinet agenda-setting and chairmanship, development of an Irish committee structure would be likely to be an additional asset for the prime minister's influence over the rest of the cabinet. There is always a need for a forum at cabinet level where controversial issues can be discussed. In Britain this is mainly carried out in cabinet committees, and in Sweden this need is solved with the help of the informal cabinet meeting - both catering for the same kind of need to explicate and decide on issues. The in-between form of the Irish Republic is significant precisely because of the way this chapter was structured to look at different intra-cabinet aspects: the Irish system has a very formal cabinet meeting where the premier is the central actor combined with no committee structure or other opportunities for deliberation on a cabinet level.

Finally, the chapter dealt with the ultimate prime ministerial instrument of cabinet-internal influence - the opportunities to reshuffle, or preferably *recompose*, the cabinet (section 5.3.4). The extent and form of the recomposition traditions vary extensively (recompositions defined as a simultaneous change of two or more cabinet portfolios). Britain has experienced

considerable prime ministerial influence exercised explicitly through cabinet recompositions, whereas such events have not had a function of office-preservation in Scandinavia. There recompositions have occurred for reasons of personnel management or specific policy-pursuit (see the division into three categories in the section on recompositions). Based on table 11 Britain is the only one of the four systems in which the frequency of recompositions per cabinet, i.e. the likelihood of changes, was greater than 1.0. Cabinet recompositions, when used to a maximum extent, as at times in Britain, can involve both a structural element of reorganising the ministries as well as a recomposition of the membership - to the extent of explicitly dismissing cabinet colleagues. A further very British feature is a recomposition below cabinet level - i.e. changes in the ranks of the junior ministers, which indeed is likely to have an impact on the cabinet as well. Cabinet recompositions have thus developed to a multi-faceted as well as multi-purpose tool of power exertion. The British cases, and recompositions in Irish single-party governments, show how different identified dimensions can develop from a formally neutral function to a means of prime ministerial office-preservation. Most of these dimensions, or prime ministerial tools, seldom have a function with a directly negative effect on the prime minister's position. The point of departure is neutral and the development of the 'toolbox' very often moves in a positive direction for the prime ministership (compare the methodological outline in chapter 2).

From the premier's point of view, a separation into recompositions of an active or only reactive character seems integral. Nominally prime ministers in different systems may have the constitutional *carte blanche* privilege of hiring and firing ministers, but, based on these four systems, there is a big practical difference between being able proactively to use the instrument, as in Westminster systems, and only being able to use the prerogative reactively, as a result of ministers' resignations. This distinction forms a substantial part of an explanation of why prime ministers in different systems (rather than different prime ministers within a system) stand on different rungs of the ladder of cabinet hierarchy. If a premier is able actively to use his 'constitutional toolbox' laid out in chapter 3, he/she is a first above or among unequals, not a first among equals, to use Sartori's phrase from the chapter introduction.¹¹⁰

¹¹⁰ Sartori 1994.

Another perspective is provided by focusing on the differences and similarities between the different sub-dimensions. To facilitate this perspective, a tabular summarization is presented below.

Table 12. LOCATIONS OF THE PREMIER'S INFLUENCE IN THE CABINET SYSTEM

| | U K | I R E | S W E | D E N |
|--------------------------|------------|--------------------|--------------------|-------------------|
| The cabinet as a forum | Formal | Formal | Formal & Informal | Relativ. Informal |
| PM's agenda influence | H | H | M | M |
| PM's dec.-m. influence | H | H | ML | ML |
| PM's control of cab.com. | H | no comm. structure | no comm. structure | L |
| PM and cab. reshuffles | H | MH | ML | ML |
| | HIGH | HIGH | MED. LOW | MED. LOW |

H=High, M=Medium, L=Low (five-step scale)

The table is a means of condensing the premier's influence as accounted for in the different chapter sections. The advantage of such a summary is it (at the expense of details) clarifies the position and enables a comparative perspective. Some aspects are worth attention. First, there are differences between the degree of influence accounted for. In the table the categorisation is the result of a subjective decision. Some characteristics, however, go beyond subjectivism: the overall degree of possible influence is much greater in the Westminster block, i.e. Britain and the Irish Republic. There is a difference between the two blocks throughout this cabinet-internal profile. There are no major incongruencies in any of the four systems between the different dimensions - they all point in a certain direction or degree of

influence. These five dimensions in the case of each system help to create credible system profiles. The role and influence of personal characteristics, as opposed to these institutional characteristics, are likely to be subordinated *as long as the system profiles are coherent*, i.e. as long as the sub-dimensions point in the same direction. In the next chapter we will examine whether this is the case with the cabinet's relationships with other parts of the political system.

6. THE PRIME MINISTER AND THE CABINET: THE EXTERNAL DIMENSION

"He who does not know Parliament cannot be a good prime minister."

J. Diefenbaker¹

Introduction

This study agrees with Jones's notion that the cabinet is a core unit of analysis for an examination of executive power². Some recent schools of thought have pointed out that the cabinet, perceived as the assembly of cabinet ministers, does not always suffice to explain decision-making outcomes in the government core.³ As explained in chapter five, if one is to examine the prime minister's role in the political system it is sound to anchor the analysis in the cabinet (see the introduction to chapter five). If the cabinet is taken as the point of departure there are two core dimensions of leadership the prime minister has to manage. The prime minister must be able to make the cabinet function internally, the basic premises of which have been laid out in the preceding chapter, and, second, the prime minister must be able to oversee the cabinet's relationship to the other players and institutions, that is, to manage the *external* dimension. Successful policy-making implies a mastering of both the internal and external elements. Only in an authoritarian regime is the latter aspect of little relevance. Often the executive can survive only by virtue of reaching a certain balance between these two dimensions. For example, if a cabinet experiences domestic problems, this can be compensated for by mastering other elements like international affairs. The essence of the executive's accountability, both symbolically and practically, lies in the cabinet members' participation in parliamentary proceedings, especially in Westminster systems.⁴

¹ As quoted from Hockin in Weller 1985, p. 166.

² Jones 1987, 1989 and 1990a.

³ See, e.g., Dunleavy and Rhodes 1990.

⁴ Dunleavy, Jones *et al* 1993, p. 268. This article is a thorough account of the role of the British prime minister in the Commons 1868-1990. For an updated version for 1990-1994, see Burnham, Jones & Elgie 1995. Another version of the first article is Dunleavy and Jones 1995.

The prime minister plays the most visible part in representing and defending a cabinet's policies. In most systems there are certain highlighted occasions of confrontation between the legislature and especially the premier (as the main representative of the cabinet). The most ritualised and well-known of all such confrontations is the twice-a-week battle between government and opposition at Question Time in the House of Commons. As Weller states:

"Parliament is the formal arena in which all prime ministers must publicly perform. They have no choice. As long as the parliament is in session, there are official occasions on which they are expected to be on display".⁵

This chapter however highlights the prime minister's interactive relationship with other political institutions. A substantial part of is devoted to an examination of the relationship between the cabinet and the legislature. One has, however, to recapitulate Anthony King's words: *"There are in the real world institutions called "executives" and "legislatures", and it is tempting to speak of the "relations" between them. It is tempting, but much more often than not misleading. It seldom makes sense to speak of executive-legislative relations. Rather, there are in each political system a number of distinct political relationships, each with its own "membership", so to speak, and each with its own dynamics and structure of power."*⁶ There are two main prime ministerial arenas that fall outside the cabinet-internal dimension: the prime minister in parliament and the prime minister on the international stage. To complete the cabinet-based analysis in this and the preceding chapter, the study will examine the ultimate resolution of cabinet relationships, external or internal: the ways of, and reasons for, cabinet termination. What do the reasons for cabinet termination reveal about the premiership? Can the reasons given for cabinet termination be taken at face value?

⁵ See *ibid.*

⁶ King 1976, p. 32.

6.1 The Prime Minister and Parliament

6.1.1 The Prime Minister in Parliament

How autonomous or accountable is a prime minister *vis-à-vis* parliament? The question is complex, but the extent and character of the prime minister's performance in parliament is a point of departure. As Richard Rose put it: "*A Prime Minister does not need to attract publicity: attention is always focused on the incumbent... What a Prime Minister needs to do is to turn this attention to his or her political advantage.*".⁷ Several observers have seen media coverage of the premier as stemming primarily from performances in parliament.⁸ Today, however, there are two main arenas for prime ministerial media coverage. The second, increasingly important, arena is the premier's international engagements, which will be dealt with later in this chapter.

The relationship between prime minister and parliament is double-edged. Parliamentary *appearances* and *accountability* are separate entities, especially in majoritarian systems. In Britain the premier literally has to confront the opposition twice a week during Question Time (since 1961), whereas this institution is less developed in Scandinavia.⁹ However, at the same time, consensual governments are more vulnerable to the views of parliament. In consensual systems the distance between prime ministerial appearance and accountability in parliament is considerably shorter. Even though Question Time is *the* highlighted event in most systems, the prime minister's performance in parliament comprises much more than that. Dunleavy, Jones *et al* make a useful distinction between four kinds of direct personal involvement by the premier:

⁷ Rose 1980, p. 11.

⁸ For a classic example, see Williams 1972, p. 78 (also cited in Rose 1980, p. 11): "... *If he does it well, it impresses first his Cabinet colleagues and also his back-bench supporters. Then it has its repercussions on television and in the newspapers.*"

⁹ This difference is elaborated later in this chapter section.

- 1) Answering parliamentary questions,
- 2) Making ministerial statements
- 3) Making formal speeches
- 4) Intervening in debates¹⁰

These four categories are listed in order of their quantitative importance in Britain (occurrence). The main difference between parliamentary questions in the UK and the other three systems lies in the vast number of questions the British premier has to answer in Parliament. According to Weller, the British premier has had to answer on average about 1000 questions each parliamentary session.¹¹ Hence a considerable part of the British prime minister's time is occupied by Question Time.¹² Dunleavy, Jones *et al* measured the premier's parliamentary involvement in *days* (i.e. days when the premier answered questions etc.), which since the early 1960s has shown a steady trend of involvement totalling 12-14 hours of questions, which accounts for about 50 separate occasions or days. Even though this figure shows an undisputable decline in involvement in comparison with the first half of the century (see their article's figure 1.), these figures are still high from our comparative perspective.¹³

¹⁰ Dunleavy, Jones *et al* 1993, p. 270. See their appendix for details on how they identified these activities (pp. 296-298). The authors use 'intervening in debates' rather than, e.g., 'participation' in order to differentiate between main speeches and interventions in debates. See also Dunleavy & Jones *et al* 1995 and Burnham *et al* 1995.

¹¹ Weller 1985, p. 70. See also the tables on pp. 14 and 17 in Rose 1980.

¹² Rose 1980, pp. 12-13: "*On two nights a week, the Prime Minister receives up to three boxes of files in preparation for the next day's ordeal, reading these ahead of Cabinet papers or Foreign Office telegrams.*". For a lengthy examination of the British Question Time, see Jones 1973.

¹³ To make adequate comparisons the authors use figures based on 'median smoothing'. Dunleavy, Jones *et al* 1993, p. 271. As a detail 14 hours equals 840 minutes, which would mean the premier who answers about 1000 questions per session has less than a minute of time for each question.

In the Commons the vast majority of questions put to the premier are oral, the supplementary questions of which tend to be particularly demanding. As a general consequence of this twice-a-week questioning the British premier scarcely speaks in Parliament apart from Question Time, usually less than ten times during an ordinary session.¹⁴ Prime ministerial statements has been in steady decline in the Commons, hitting an all time low under the Thatcher leadership.¹⁵ Prime ministerial statements are not normally of great political weight and are mostly confined to foreign affairs, particularly accounts of international summits. The prime minister makes substantial speeches in the Commons mainly at the yearly Queen's Speech and when introducing major pieces of legislation. Personal involvement, save the Queens Speech and a motion of no-confidence, are however made at the choice of the premier, and the quantity of these involvements is, at least in Britain, a rough indicator of how troublesome government finds the process of law-making. Backed by a comfortable majority in parliament there is generally no need for the premier to appear in and appeal to parliament, whereas more complicated vote calculations may require the appearance of the prime minister. Prime minister Major focused his prestige and attention on key motions and frequently had to introduce them to the House in person (e.g. the 1994-1995 session). The fourth category above, intervention in debates, seems even less important for the premier. Since the late 1970s British premiers have intervened in debates on very few occasions (which the premier used to do as simultaneous leader of the Commons until World War II).¹⁶

In the Irish Republic procedures about the premier's appearance in Parliament are regulated to his/her advantage and the appearances are in general of less importance in comparison with Britain. The Irish parliament sets aside 75 minutes three days a week¹⁷ for Parliamentary Questions. Ministers orally answer questions (which have to be submitted three days in advance in writing) in rotation, on successive sitting days. However, the majority of questions

¹⁴ See, e.g., Rose 1980, p. 16. The British premier however appears in Parliament on a very regular basis, see Donoughue 1988. On different ways to conceptualize 'a parliamentary session', see Parliaments of the World 1986.

¹⁵ Dunleavy, Jones *et al* 1993, p. 280.

¹⁶ Ibid., pp. 284-286.

¹⁷ Tuesday, Wednesday and Thursday (Gallagher 1993, p. 136).

are for written answers. The average number of parliamentary questions per annum 1984-1988 was 10.791, of which only 2.011 were for oral answer in Parliament. The prime minister's prospects of evading intricate question are realistic. Ministers are not formally obliged to answer supplementary questions (which tend to be the difficult ones in Britain), which leaves media coverage as the foremost means of scrutiny.¹⁸ Taking into consideration the Irish system of rotation, the Taoiseach's parliamentary involvement is much less focal than in the UK, although the Irish parliamentary system has been described as "*...more British than the British themselves*".¹⁹

In Sweden the premier's appearance in Parliament has been seen as moving towards a more visible role.²⁰ However, using quantitative techniques similar to that of Dunleavy, Jones *et al* for the British case, this 'more visible role' seems like an exaggeration. The variation in the premier's parliamentary activity has, in spite of some variation, remained fairly stable since early 1970s. Typically the premier appears in Parliament between 20 and 40 times during one parliamentary session. As the number of institutionalised appearances by any standard is significantly lower than in the Westminster-system cases, there is a more visible variation in activity from premier to premier. The activity of prime minister Bildt (sessions 91-92, 92-93, 93-94) quantitatively accounted for roughly the double in comparison with that of his predecessor and successor, Ingvar Carlsson. Nevertheless, the number of times the premier has actually spoken²¹ in the Swedish *Riksdag* is on a different and much lower level in comparison with Britain - lower even than in the Irish Republic. The Swedish record is still [1996] held by prime minister Palme, who in 1971 spoke 71 times in Parliament.²²

¹⁸ Gallagher 1993, pp. 137-138.

¹⁹ Farrell 1988.

²⁰ Wahlbäck 1984, p. 159.

²¹ In Swedish 'yttranden' (~ utterances), which are counted in Parliament. Regrettably no separation between different kinds of utterances in parliament is made in Swedish parliamentary statistics, which makes any further comparison with, e.g., Britain's over time, infeasible.

²² The appendix to Ruin 1990 offers a rare insight into the number of times the Swedish premier has spoken in parliament 1876-1989.

Significantly this session was the first of the new unicameral Swedish Parliament. An adjusted average for the unicameral *Riksdag*, based on the data in the appendix to Ruin 1990, shows the premier addressed Parliament on the average 37 times per session (1971-1989). However variation between sessions was considerable. Only two years after his 1971 peak Palme addressed Parliament only 39 times.²³ Ingvar Carlsson, exemplifying the premier in the 1980s, had not until 1990 spoken in Parliament more than 30 times during any one session.²⁴ The premier's appearance in Parliament is by no means similar to the relative emphasis it is given in majoritarian systems. Accordingly the Swedish tradition of questioning ministers is less institutionalised and questions can theoretically be posed on Mondays, Tuesdays, Thursdays and Fridays - as used to be the case in Britain (although a Swedish practice of twice a week, Tuesdays and Thursdays, has been established²⁵).

During the ten years between the sessions 1981-1982 and 1991-1992 the number of questions was on the increase, reaching a total of 858 questions in 1991-1992 (426 questions 1981-1982). According to the formal procedures, questions (which have to be submitted in writing) need not be answered by ministers.²⁶ Questions have on several (however somewhat exceptional) occasions been left unanswered.²⁷ Neither the Parliament Yearbooks nor academic articles specify the number of questions put to the premier. In one of the few studies of the Swedish premiership, Ruin described the premier's involvement in parliamentary affairs as follows:

²³ Ibid. (the appendix). None of the figures for the mentioned years (sessions) is distorted by the premier's being in office only a part of the session.

²⁴ See the appendix to Ruin 1990, pp. 130-133.

²⁵ Isberg 1984, p. 92 (this source gives a detailed account of the procedures).

²⁶ Ibid., p. 92.

²⁷ Questions remained unanswered, mainly because of a change of cabinet, at the end of the 1978-1979, 1979-1980 and 1980-1981 sessions (a total of 72 questions). See *Riksdagens Årsbok* 1986-1987, p. 194.

"The most visible part of a prime minister's involvement in parliament is his participation in parliamentary debates... The premiers' performances have had a varying character. The involvement has at times meant answering questions and interpellations... The distance between the prime minister and the parliament has - as for all other cabinet members - increased."²⁸

The premier's role in Parliament has become more significant in Denmark and demonstrates fewer of the contradictory characteristics of the Swedish case. Again there is the steady increase in the number of questions directed to all ministers in Parliament.²⁹ The total number of questions answered in the Danish parliament during the 1979-1980 session was 1252. During the 1993-1994 session this number reached a record-high of 1878, most of which, however, were written questions, which in Denmark implies an answer in writing. The number of questions directed to the prime minister was 134 (of a total 1878, i.e. seven per cent). With this figure the premier was only fifth on the Danish list of most wanted ministerial respondents. Yet with oral answers in parliament (the weekly so-called '*onsdagsspørgsmål*', i.e. 'Wednesday Questions'), the prime minister, with 44 answers during the 1993-1994 session, was only just superseded by the Minister of Traffic (47 oral answers).³⁰ The prime minister's answers amounted to 20 per cent of all ministers' oral answers. Thus the Danish premier shows a higher frequency of association with Parliament than in Sweden. During the same 1993-1994 session the total number of times the Swedish premier addressed Parliament was close to the number of oral questions put to the Danish premier.

²⁸ Ruin 1990 (here translated by Fredrik Holm/own underlining; the book has also been published in english).

²⁹ Compare Folketingets Årsbog 1993-1994 and Fitzmaurice 1981, p. 61, Worre 1981, p. 80.

³⁰ All data on the 1993-1994 session are from the official statistics in Folketingets Årsbog 1993-1994 (the Parliament Yearbook), pp. 14-19. The Swedish and Danish figures are not similar since the Swedish category '*yttranden*' ('utterances') is a broader category than 'questions' in Denmark.

The cabinet's frequent seeking of parliamentary support issue by issue has forced the Danish premier to play a comparatively prominent role in parliamentary proceedings and the premier often represents the cabinet in more important debates and in interpellations. The interpellation device has been frequently used in Denmark: a question is answered by a minister (often the prime minister) after which there is a further debate and subsequently a vote, or number of votes, in the *Folketing* (similar to a censure motion).³¹ However, the role of the Danish premier compares with the same relatively low appearance level as the Swedish, compared with the about 1000 questions a British premier has to reply to per session.

It is difficult for a British premier to delegate the answering of questions to other ministers (although this indeed is possible on an *ad hoc*-basis, e.g. if abroad). In Sweden and Denmark the circumstances are almost reversed; the parliaments are primarily interested in hearing how the responsible ministers answer questions about their specific policy-areas (also a traditional part of Westminster parliamentarism, which, however, receives only a fraction of the media attention of the PMQs). On the other hand the scarcity of appearances of the Nordic prime ministers in parliament give these appearances a considerable significance.

The differences point to some conclusions. Prime ministers' political activities are likely to be centred around parliament to very different degrees. Whether a Westminster-kind of tie to parliament is of importance for the prime minister's position is debatable. The appearances premiers make in Westminster are little more than institutionalised forms of political information exchange and agitation.

The political majority-minority axis is indeed of importance for deciding whether a premier's performance will be substantial or symbolic. However, if this axis is discounted as a constant, the different traditions contribute to different degrees of prime ministerial autonomy. A Swedish or Danish prime minister can, *ceteris paribus*, minimise his/her appearance in parliament, should he/she wish to do so (bearing in mind the Swedish cabinet does not vote in parliament). A British cabinet is obliged to vote in Parliament. A British prime minister with a very weak or non-existent majority in parliament faces the same approach in Question

³¹ See, e.g., Fitzmaurice 1981, p. 62 and Worre 1982, chapter 8.

Time as a colleague with a solid majority. Hence the institutionalised level of autonomy matters, which we will return to in the concluding seventh chapter.

There are several different trends for questions put to the premier in parliament. The degree of institutionalisation and the number of questions are not only considerably lower in the two Nordic systems; also the questions' characteristics are dissimilar between the two blocks. In Sweden, and particularly Denmark, the majority of questions are posed in writing, whereas a British premier has to confront the bulk of questions directly and hence orally. The distinction between the traditions of prime minister as a *chief* and a *chairman* is reflected in this executive-legislative relationship. A chief is expected to be the foremost vendor of the cabinet's policies, to be the central actor both internally and externally, whereas a chairman is expected to perform primarily internal functions (compare Denmark). Generally this chapter's introductory quotation need not therefore be relevant to the cases of Sweden or Denmark. The British case is the reverse and touches upon a different dimension. Question Time is the most institutionalised and focal form of appearance of the premier in the political system, but at the same time, almost the only institution (apart from formal voting in parliament) that under normal circumstances binds the premier to the legislature.³²

There are some further differences between the contents and character of the different systems' question sessions. In the British system the role of the opposition is to present an alternative to the government's policy, whereas the role of the opposition in Sweden and Denmark has typically been consensual; the opposition tries to contribute to changing the proposals rather than to present a contrasting view.³³ In the Westminster block Question Time may be an arduous experience, but it almost never has any impact on the cabinet's policy-making. In the Scandinavian cases it is uncertain whether the premiers' appearances influence policy-making more than in the Westminster-systems, the appearances are certainly institutionalised on a low and insignificant level. There is a contrast between the institutional and contextual linkages between the two branches of government. As for consequences and

³² Considering the proportional importance of the four different forms of involvement in Dunleavy, Jones *et al* 1993.

³³ Compare Lijphart 1984.

outcomes the contextual linkage is more important. However, the different institutional linkages allow the premiers different degrees of flexibility *vis-à-vis* parliament. This flexibility can be translated into the different degrees to which the premier *has to* focus on parliament. Hall stated that the free will of political leaders is channelled through institutional mechanisms.³⁴ In this particular case the route of the British premier's free will is narrower than that of his/her three colleagues.

6.1.2 The Parliamentary Agenda

A significant opportunity for the executive to exercise control over the legislature is the degree to which a government can decide upon the order and organisation of the parliamentary agenda, just as a premier may have opportunities to mastermind the cabinet agenda (see the preceding chapter). In reality a compromise has to be worked out in each liberal democratic political system, which neither gives the executive a too blatant dominance over parliament through the agenda nor *vice versa*. Yet, as can be derived from information in for instance *Parliaments of the World*,³⁵ there are numerous systems where one institution still dominates the other. If the order of business is decided by the government, uncomfortable topics can be disposed of easily and the government may adopt a dictating attitude towards parliament.³⁶

In the UK the government has the prerogative of drawing up most parliamentary business. Both the general guidelines and daily business are managed by the Leader of the House and the Chief Whip, albeit only after informal consultations with the opposition and other parties, thus guaranteeing a fairly consensual order of business ('the usual channels'). In the Commons there are, in addition, a number of provisions that should ensure agreement, most notably a provision for 17 parliamentary days for topics chosen by the leader of the main opposition (and three days of parliamentary business for the second largest opposition party).

³⁴ Hall 1986, p. 259.

³⁵ *Parliaments of the World* 1986, p. 392 (table 11a).

³⁶ *Ibid.*, p. 391.

The Irish party whips formally arrange the parliamentary programme, but the government is in a dominant position. Farrell writes about a majority government's 'total control over the legislative timetable'.³⁷ This dominance is codified in the Dáil Standing Orders 25, 86 and 122-125. Standing Order 25 gives the *Taoiseach* the right to direct the business and order of events day by day in parliament. Government business in parliament is proposed by the prime minister and is then settled by the government in consultation with opposition whips and is finally announced daily by the prime minister in the House (private business determined by SO and practice).³⁸ Gallagher writes: "... *it remains true that Irish governments do not routinely fear dismissal by the Dáil; governments are not regularly made or broken on the floor of the house.*"

In Sweden, as a contrast to Ireland, the arrangement of parliament's programme is meant to be apolitical, like other formal parts of the parliamentary process. Thus the programme, including the sessionary guidelines and the details, is worked out by the so-called Speaker's Conference, which comprises nothing less than the (apolitical) Speaker, the Deputy Speakers, representatives of each party group, committee chairmen and the Vice-Chairman of the Board of Administration of the *Riksdag*.³⁹

In Denmark the President of the Parliament plays a key role in organising parliamentary business.⁴⁰ The President of the *Folketing* is generally 'above' daily politics (he has, by *inter alia* Fitzmaurice, been described as being a cross between the apolitical Speaker of the British Commons and the political Speaker of the US House of Representatives), and is aided by four Vice-Presidents from each of the four largest parliamentary parties. The 'work programme' is proposed by him/her, as is the order and priority of issues in parliament (usually after consulting with the chairmen of the political groups). There are fewer possibilities of amending the daily agenda than in the Irish Republic, since the specific programme for each

³⁷ Farrell 1994, pp. 74-75.

³⁸ Parliaments of the World 1986, pp. 408-409 (table 11).

³⁹ See, e.g., *ibid.*, pp. 420-421.

⁴⁰ See Fitzmaurice 1981, pp. 59-60 and Parliaments of the World 1986, pp. 402-403.

week is decided upon at the last sitting day of the preceding week. However, Fitzmaurice characterised the Danish parliament as follows:

"The Folketing is at the centre of Danish politics; it is a cockpit, a theatre, a place of permanent negotiation between the parties. Like all parliaments, it has procedures and rules; it has customs governing behaviour, which give a certain formality to its proceedings, but in spite of this its work and style, like Danish society in general, are extremely informal."⁴¹

6.1.3 Cabinet and Parliament - The Dual Membership Question

A sub-question, which has been briefly addressed earlier in the constitutional outline (chapter III), is whether the members of the cabinet simultaneously can act as members of parliament. In the British system there are no objections to this fusion of duties, quite the contrary; the cabinet, with the prime minister, plays a key role in parliament in the form of the 'front bench' and accordingly votes in parliament. This practice is equally found in the Irish Republic and in Denmark. Sweden, however, represents a deviant case: a member of the cabinet is not allowed to act as an MP and thus has to give up the seat to an alternate member (if he/she has one): *"Consequently, ministers tend to appear in Parliament these days only when their own issues are being debated, or on special occasions."*⁴² In Denmark cabinet members are MPs, and hence vote in parliament. As concluded earlier, a separation of executive and legislative duties is likely to play only a minor role: it increases the distance between the two branches and contributes to the premier's autonomy *vis-à-vis* parliament. The Swedish practice contributes to explain why premier's frequency of appearance in parliament is the lowest of the four systems.

⁴¹ Fitzmaurice 1981, p. 59.

⁴² The ministers, however, have a so-called cabinet seat in parliament, which tends to be used only when matters of importance for that minister (ministry) is debated in parliament. The ministers are not entitled to vote (see, e.g., Larsson 1994, p. 172).

6.1.4 The Prime Minister and Parliament: Some Reflections

The relationship between a premier and parliament is characterised by a divide between symbolic and substantial politics. If one takes a parliamentary majority for granted, parliament plays a substantial role in the premier's cast of roles only at certain conjunctures, most notably at the special occasions of cabinet initiation and termination and when passing legislation which divides parliament along lines other than the traditional party-political dimension.

Two distinctively different relationships between prime minister and parliament have been depicted in the four systems. There is a concrete difference in the extent to which a prime minister has to devote time to parliament. To gain an overall view and test the arguments' reliability it is worth considering some additional indicators. One such indicator of this 'executive-legislative relationship' is the extent to which government bills pass the scrutiny of parliament. During the period 1978 to 1982⁴³ practically every government bill introduced passed the British House of Commons. The high rate of bills passed in the Irish Republic and Denmark is less self-evident. Both systems show an average of about 90 per cent of government bills passed.⁴⁴ The average of government bills passed during the Danish parliamentary sessions 1988-1989 to 1993-1994 was 88 per cent (ranging from the unusually low 65 per cent 1990-1991 to 98 per cent during 1993-1994).⁴⁵ At the time of writing there is no exactly similar information about Sweden, but "most" of an average of 1000 government bills were passed.⁴⁶ Even the liberal minority government in power 1978-1979 managed to push 57 per cent of its legislation through parliament without changes.⁴⁷

⁴³ Comparable information for this particular period is available in *Parliaments of the World*, 1986, pp. 907-940.

⁴⁴ Denmark: 88.5 %, the Irish Republic: 90 % (for member's bills 6 % and 16 % respectively), *ibid.*

⁴⁵ *Folketingets Årsbog* 1994, p. 12.

⁴⁶ Larsson 1994.

⁴⁷ *Ibid.*, p. 182. The liberal minority government only had a parliamentary support from 39 out of 349 MPs.

Of the four main kinds of personal prime ministerial involvement, only parliamentary questions could have a negative effect on the premier's exertion of authority and influence. This possible effect is, however, also dependent on the premier's personality. In the Scandinavian systems confidence-measuring instruments like interpellations are in more frequent use, but they are mostly political statements of an 'on/off'-character. If the cabinet loses a vote of confidence it is indeed a definitive disruption, but, on the other hand, if it does not, the consequences might even be positive for the premier. Winning a vote of confidence with a narrow margin, especially when it is narrower than expected, is not generally seen as problematic in Scandinavian systems since the governing majority has often been thin.

An additional indicator of the *de facto* time a premier has to devote to parliament is the average number of parliamentary sitting days (in the British and Irish cases, of the relevant house). This indicator of the premier's status received attention in Weller's study of Westminster premiers in the mid-1980s, because there was a significant *de facto* variance.⁴⁸ The highest average is that of the British Commons, which sits on average 170 days per session, followed by the Swedish *Riksdag* with 138 days (of which, however, 13 are only formal, short sitting days). The Danish *Folketing* sits only 106 days on average, which would amount to only 62 per cent of the time the British premier has to appear in the Commons. In the Irish Republic the premier has a variety of means at his/her disposal for controlling a Dáil that convenes only about 85 days per session (this is exactly half of the average time of the British Commons).⁴⁹ A further analysis should try to define the effective number of parliamentary sitting days, ie. days when substantial legislative debates and votes are undertaken.

In the cases of Britain and the Irish Republic, institutionalised proceedings in parliament act as a continuation and catalyst of relationships within the cabinet. There are three crude scenarios for the 'executive-legislative relationship'. The cabinet can overshadow parliament,

⁴⁸ Weller 1985, pp. 169-171.

⁴⁹ Figures from Parliaments of the World 1986. The low figure for the Irish Republic was confirmed with information received from the Office of the Houses of the Oireachtas (January 1996).

parliament can overshadow the cabinet, or there can be an equilibrium between the two. The problem is that a multitude of interrelated dimensions are involved. On a constitutional level the relationship tends to be built up to create an equilibrium, with effective parliamentary instruments at the disposal of both branches. However, a cabinet's predominance over parliament and parliamentary business is a result of the government's agenda-setting dominance (deciding on the organisation of business in parliament), whereas any parliament's predominance over the executive tends to stem from the political composition of parliament. The government has the ability to decide which issues are to be dealt with, whereas parliament *might* influence how the issue will be finally formulated. In this general sense the relationship between cabinet and parliament is similar to the relationship between the prime minister and the other ministers within cabinet. Only in the Westminster systems, the cabinet's, and often particularly the premier's control over the legislative agenda, is steadfast.

In conclusion, parliament plays a very different role for the premier, even within the matching pairs-analysis of this work. There are entirely different traditions, with Ireland as an example of a system that provides the premier with procedural benefits. The majoritarian British system relies on a short distance between the executive and legislative branches of government, whereas the Swedish system by procedure tries to separate the two, which in the latter case has the practical and important consequence that the premier has to devote much less time to parliament. Parliamentary business does not procedurally constrain the cabinet's policy-making. Often parliament becomes an extension of the agenda-setting powers of the premier (the best example of which is the Irish Republic). Possible constraints on cabinet policy-making stem from the specific political context. When it comes to how the government's proposals are received in parliament, intra-party discipline is often as important as inter-party factors. The premier is likely to be the head of the largest parliamentary party, and his/her governance will bear a marked impact on how the party operates in parliament. If cabinet ministers from the same government party show severe disagreement, such dissension will almost certainly be reflected in parliament. A notable example of such circumstances is the British Conservatives' government under premier John Major. The prime minister's greatest challenger was at times his own party (especially late 1994-1995, with the rift over Europe and eight Tory MPs' losing the party whip).

6.2 The Prime Minister and International Politics

So far this study has been concerned with examining the prerequisites of prime ministerial leadership within the scope of national politics. However, an increasingly important dimension of the premiership is participation in decision-making on an international or supranational level. National and international politics are doubtlessly becoming more interdependent,⁵⁰ and the premier's international engagements bear more and more concrete implications for national politics. International summits have increased in quantity and their decision-making has often tended to move from symbolic and outlining politics towards tangible decision-making in, for instance, world trade and security policy issues. The European Communities' transformation into the European Union has led towards more supranational politics and increased international engagement for the concerned prime ministers. In particular the competence of the EU Council of Ministers has expanded and increased the cabinet ministers' international role. However, this increased international decision-making is not only an imperative of the cabinet, the increase of influence has been dispersed unevenly within the cabinet. Influence on the international arenas is heavily concentrated in the hands of a few key ministers, most notably the prime minister and the *minister troika* consisting of the prime minister, the minister of foreign affairs and the minister of finance.

The increased influence has in general not been matched by checks and balances. There is, however, a unique EU-related institution in Denmark which links together the two main dimensions in this chapter, the parliament and international affairs, and makes the premier no more than a *primus inter pares*. The Danish European Affairs Committee (formerly the EEC Committee), a highly influential parliamentary committee, takes a stand on the cabinet's 'mandate for negotiation'; it is proactive rather than reactive.⁵¹ It arranges hearings with the cabinet ministers *before* they present the Danish position and cast the vote in EU's Council of Ministers. The rationale behind the institution is that the Danish system often has produced minority governments whereas many EU issues have been seen as nationally important

⁵⁰ The term 'intermestic' has been used to describe this high degree of interpenetration. Lee 1995, p. 202 (referring to Peter Byrd's *British Foreign Policy Under Thatcher*).

⁵¹ The European Affairs Committee of the Danish Parliament 1995, p. 3.

enough to require the views of the whole parliament. Hence it has been impossible for a cabinet minister to override the conclusions of the committee, at times a considerable bone of contention for representatives of other countries in the Council of Ministers. The committee essentially scrutinises EU legislation, but, importantly, the premier faces equal hearings in the committee before a European Council as any other minister faces before casting the vote in the Council of Ministers. The committee also carries out an examination of the mandate *a posteriori*: *"Subsequent to the meeting in the European Council, the Government forwards the conclusion of the Presidency and the Prime Minister again appears in the Committee to account for the outcome of the summit. Then follows a round of questions and possibly a debate on a few of the subjects of the summit."*⁵² This institutional arrangement is so far an original Danish solution which implies that the Danish cabinet, concerning European affairs, is more accountable to parliament than any of the cabinets in the other three systems. Furthermore, the prime minister is no exception to this rule: his or her status is the same as that of the cabinet colleagues.

All four political systems dealt with in this study belong to the European Union, which through several other institutional arrangements has concentrated political influence in the heads of government. The most notable of these features is the rotating six-month Council Presidency of the European Union. The Treaty on European Union (Maastricht 1993) formally enhanced the decision-making powers of this prime-ministerial summit (which are usually attended also by the ministers of foreign affairs and ministers of finance). The Presidency is formally attributed to a certain minister, most likely the premier or minister of foreign affairs, with a subsequent extensive media focus on these key national actors. At the time of writing [1996] the Council Presidency is in the hands of the nationally unelected Italian prime minister Lamberto Dini. The short duration and the largely predetermined agenda of the Council Presidency make a substantial national impact in one political direction or the other unlikely,⁵³ however, there is another side to this coin. The Council Presidency is likely to contribute substantially to the pool of influence the premier has at his/her disposal. Because

⁵² Ibid., p. 8. However, the procedure has never led to actions against the premier (Jakob Thomsen, interviewed in May 1996).

⁵³ See Kirchner 1992, p. 128.

of its *distance* from national politics, bargaining in supra- or international institutions is easily used as a vehicle for the promotion of domestic political (self-) interests - even when the bargaining results are meagre. As a practical example, the European Commission every year proposes reductions in fishing quotas ('TACs'). These proposals are watered down by the national ministers - claiming simultaneously they have won a victory for their own national fishermen as well as for fisheries conservation.⁵⁴ Key actors try to minimise this distance as for solutions likely to be popular at home, and conversely, attempt to maximise the distance to solutions likely to create a negative response at home. The cabinet can maximise the utility of counterproposals, like the negotiated British opt-out of the EU's Social Charter in the Treaty on European Union negotiated by prime minister Major. On only few occasions can international decisions be attributed specifically to certain key actors, like a prime minister, because of the complexity of international bargaining between a multiplicity of actors.⁵⁵ Furthermore, in international policy-making the distance between words and deeds is longer than in national politics, because of the often complicated and lengthy procedures of ratification embedded in international treaties. The key actors in national politics have far-reaching opportunities for 'political arbitrage' - to exploit this distance between national and international politics to their advantage. Thus international engagement on an élite level is likely to enhance influence in national politics; strong national prestige is similarly likely (however less) to create some overspill into international engagements.⁵⁶

Summa summarum, the modern prime minister has a multitude of international opportunities available to enhance his/her (domestic) position, which puts him/her on an unequal basis with most cabinet colleagues.⁵⁷ In addition to the European Councils every six months, the recurring IGCs (or international governmental conferences, e.g. the 1996 EU Summit) also

⁵⁴ For further details, see *European Voice* 21 December 1995, p. 6.

⁵⁵ Compare Putnam 1988.

⁵⁶ See Moravcsik 1991.

⁵⁷ Compare the way US foreign policy has tended to be used clearly as a tool for the enhancement of domestic popularity (the 'domestic politics model' in international relations).

play a visible part.⁵⁸ With the Treaty on European Union the role of the European Council has increased and is likely to increase further.⁵⁹ The British premier plays a significant part in the Group of Seven (G7) meetings and in Commonwealth summits, even in policies that initially might seem to belong to other cabinet ministers.⁶⁰ There are further channels for possible international engagement, particularly in Europe: summits, rotating presidency arrangements and parliamentary assemblies of international bodies such as OSCE, WEU, the Council of Europe and NATO. The trend of increasing official and unofficial bilateral summity offers yet another opportunity to negotiate matters at head-of-government level (e.g. Franco-German and Franco-British summits). Another very different but notable opportunity for elite-level negotiation is offered by state funerals.⁶¹ There are also other international roles the prime minister increasingly must take up. About Britain Lee writes that 'selling Britain' has become a prime ministerial function in a strictly commercial sense.⁶²

Ergo, the premier's sphere of politics has in recent years expanded on the international arena in linear proportion to the growing interdependence between nations. The executive branch, especially the prime minister, has been a net winner of decision-making influence whereas the traditional legislative branch has been a net loser. Therefore the executive's increased influence has not been accompanied by any notable increase in accountability to any other political entity. Increased media coverage might be the only factor that correlates positively with increased international opportunities. The prime minister is today more likely than ever to be a person that can match the requirements of the institution rather than *vice versa*.

⁵⁸ For further information on the EU, see, e.g., Kirchner 1992 (table 4.2, p. 79).

⁵⁹ The EU Reflection Group, headed by Mr Carlos Westendorp, in its report of December 1995 concluded that "*the leadership role of the European Council will be even more important in future in view of Europe's agenda.*" (Reflection Group Report, p. 27, article 97).

⁶⁰ As an example, the British prime minister's personal role in economic management became more evident in the 1980s as the cabinet was committed to improve the international competitiveness of the industry by promoting privatisation and deregulation. See Lee 1995, p. 214.

⁶¹ Lee offers a perspective on how state funerals can become a delicate matter of protocol. Idem 1995, pp. 207-208.

⁶² Ibid., p. 208.

Most of this summity has developed since the 1970s. One of the most important consequences of the recent changes is that the influence spheres of the prime minister and of the minister of foreign affairs have become progressively intertwined. United Nations' affairs are one part of international politics where a hierarchy leaves the premier's role at a minimum, including little more than traditional representation. The growing number of international engagements have, however, generally tended to create a hierarchy in which the premier is the ultimate representative (and increasingly the decision-maker) of the cabinet's policies, while ministers of finance, foreign affairs and European affairs handle international issues on an ordinary basis. All cabinet ministers are increasingly involved in international decision-making, particularly within the framework of the EU Council of Ministers. However, the EU also provides concrete examples of how the premier's international role has been elevated in comparison with other ministers. Especially since the SEA - the Single European Act 1986 -and, later, the Maastricht Treaty 1993, many decisions in the Council of Ministers require only a majority or qualified majority, which hence decreases the *de facto* decision-making power of individual ministers. The member-states try to minimise this loss of control by elevating an increasing number of issues to the European Council-level. For the office of prime minister there has been both a deepening and a widening of the opportunities to influence politics in the EU. The two new policy pillars of the Maastricht Treaty, the CFSP and the JHA, have shifted some of the responsibilities, particularly over CFSP (the Common Foreign and Security Policy), to the minister of foreign affairs *and* the premier. The premier's role has been substantial, since particularly the CFSP is a policy-field dealt with intergovernmentally rather than supranationally.⁶³ This international role of the premier has grown in importance as the international issues at stake have equally grown in concreteness, recently within the field of European security policy (e.g. ex-Yugoslavia). The 'summit-role', the high-level international representation, involves an increasing number of elements of decision-making, as Europe has left behind its stagnant division into political blocks.

⁶³ For perspectives on the decision-making in the European Union, see, e.g., Peterson 1995, Teasdale 1993 and Kirchner 1992.

The international engagements by default swallow a large bit of the premier's schedule. Some estimates gave at hand that 80 per cent of Mrs Thatcher's time during the late 1980s was spent in this sphere of politics.⁶⁴ However, a premier's influence in international affairs is to a great extent determined by the premier's personal political preferences. The preferences of the Swedish post-1945 premiers well exemplify this argument. Prime minister Tage Erlander was strongly involved with domestic politics, at a time when it again was convenient after the second World War, and the creation of a state structure based on Social Democratic beliefs, whereas Olof Palme exemplified international engagement in a way unrivalled before and since.⁶⁵ Carl Bildt, the Moderate Unity Party's premier from 1991 to 1994, was another Swedish premier with a primary interest and accordingly central engagement in international affairs. Nordic premiers have also had their particular opportunities to interact internationally. Nordic premiers traditionally have exchanged thoughts and attracted the media on uncontroversial ground within the framework of the Nordic Council and Nordic Council of Ministers. The Nordic Council (which however is likely to lose some of its prestige because of the 1995 accession of two more Nordic countries to the EU) recently introduced a system of active leadership, which means the prime minister in charge sets up the agenda and the priorities for each rotating Presidency (as with the EU Council Presidency).

The grey zone of linkages between international and national politics and its consequences for certain political actors is generally difficult to depict, since much takes place on an *ad hoc*-basis. The executive responsibilities for international affairs are rather moving away from the old institutional patterns of sole foreign office primacy. A reasonable conclusion is that a premier who, among other things, plays a vital role in the rotating EU and Nordic Council Presidencies stands an ample chance to utilise these international engagements - and their media effects - to advance personal political goals. The premiers' international engagements are visible in a different way from the everyday work of, for example, the minister of agriculture in the management of EU politics.

⁶⁴ Lee 1995, p. 200.

⁶⁵ See the article 'Three Swedish Prime Ministers', Ruin 1991.

The linkage between the office of prime minister and international politics is important for this study from several angles. First, the changes in Europe have created more international opportunities for cabinet and, especially, the prime minister. Second, the transformations that have occurred have been facilitated by successful bargaining between prime ministers. In a seminal article on European integration, Moravcsik claims the domestic autonomy of the heads of government is a central explanatory factor for successful international policy-making.⁶⁶ He exemplifies this argument with the processes behind the successful completion of SEA agreement in 1986/87 and argues the French, German and British premiers had the opportunity to dynamically interact without severe domestic institutional constraints (i.e. they enjoyed an autonomous status): *"Domestic analysis is a precondition for systemic analysis, not a supplement to it. The existence of significant cross-national variance in state policy preferences and diplomatic strategy invites further research into the domestic roots of European integration."*⁶⁷ In an earlier and more theoretical article on the relationship between international relations and domestic politics Putnam equally showed that the actor's underlying institutional dynamics is essential in two-level game bargaining. He pointed to some intriguing paradoxes: institutional arrangements which strengthen decision-makers at home may weaken their international bargaining position and vice versa.⁶⁸

These articles have in common that the premier's domestic constraints and freedoms are seen as decisive for outcomes in international bargaining. This line of thought is evidently close to this thesis, which ultimately tries to define the domestic institutional freedoms and constraints. However, today the prime minister's importance in international politics has reached a point which also reverses the effect: the prominent international position, especially within the EU system, provides impetus for domestic politics.

⁶⁶ Moravcsik 1991, pp. 656-658. He refers to his approach as 'institutional intergovernmentalism'.

⁶⁷ Ibid., pp. 687-688.

⁶⁸ Putnam 1988, p. 460. Otherwise one would be tempted to see a 'snowball effect' inherent in the premier's utilisation of international politics: the stronger the premier is at home, the more he/she can utilise the opportunities of international politics.

6.3 The Cabinet-Dimensions in Perspective: Reasons for Termination

In the same way as chapter four was concerned with the party-internal procedures of leader selection, this final chapter section examines the reasons for the termination of governments. This examination has been left to the end of the two chapters five and six on cabinet-internal and -external relationships since it provides a perspective on many of the aspects that have been dealt with previously in these chapters.

The reasons for cabinet resignation, categorised in a variety of ways, have been used as an indicator for a range of purposes, and have been a foremost indicator of the overall character of a political system. There are many related indicators that belong to the same group of macro-explanatory attempts: the number of cabinets, the number of reshuffles and the political longevity of cabinet members.⁶⁹ Discounting for specific political circumstances, the reasons for cabinet termination are closely related to the office of prime minister, much more so than as an indicator of many other system features. How many premiers have eventually had to go because of dissension within the cabinet or lost parliamentary support, both categories which have been dealt with in this study? To explain the systemic position of the premier one has to go beyond the mere figures. There are three main reasons for cabinet termination:

- 1)** general elections,
- 2)** the resignation of the prime minister, and
- 3)** parliamentary reasons.

General elections are the most usual way of achieving a change in government. In some political systems the cabinet has to formally resign and continue as a caretaker cabinet only when a general election is called. However this is not the case in Britain or Ireland, but if the same political party/parties win the election, the cabinet is counted as a new one in the statistics (for instance the Wilson governments in Britain). Usually general elections prove to be suitable (and sometimes necessary) events to facilitate a reshuffle of cabinet portfolios.

⁶⁹ For examples of the usage of such variables, see Blondel 1982, 1985 and Budge & Keman 1990. As for the role of reshuffles, or preferably recompositions, see the preceding chapter.

The other main reason for government termination is the resignation of the premier. The resignation is usually caused by health reasons or political misgivings of a more personal character, most often an inseparable combination of several factors. A significant possibility is deselection from the party leadership, which has been dealt with in chapter four. This category of resignations has to be separated from the third category, cabinet resignations because of conflicts of a political nature - like lost confidence within a coalition or an explicit vote of no-confidence in parliament.

In the analysis below some further distinctions have been made on the basis of information in *Keesing's* (various years), *Facts on File* (various years) and the special issue on political data in the *European Journal of Political Research* (June 1993). Most general elections constitute a coherent and unambiguous category of cabinet resignation, and is hence accounted for as one category only. Based on the information in *Keesing's* the reasons for termination caused by the premier's resignation can be divided into sub-categories. A number of prime ministers in different systems have had to resign as a result of various 'health' problems: this includes premiers that died in office or, as with Swedish premier Palme, were assassinated. Further division and examination of the reasons for *premiers'* resignations give a more diverse picture. If one can state, beyond reasonable doubt, that the premier has resigned because of real health problems, this constitutes a category which is beyond political control and can, as such, be removed as a constant which does not add much information about the systems' characteristics. In the same way it is possible, if not necessary, subsequently to divide the political/parliamentary reasons for termination. The most rational division for the purposes of this study is to see how many cabinets have fallen as a result of cabinet-internal dissension as opposed to how many have had to resign as a result of withdrawal of parliamentary support (which in its own right is a foremost indicator of the system and the parliamentary volatility).

An operationalisation of the causes for government termination:

- 1) General elections
- 2) The premier's 'voluntary' resignation
- 3) The premier's resignation caused by 'health' or neutral factors
- 4) Dissension within the cabinet
- 5) Lost parliamentary support

The prime minister plays a crucial role in three out of five categories of termination (categories two, three and four). Even in the two other categories the role of the prime minister is essential to an understanding of events. The data in *European Journal of Political Research* to a great extent follows the same line as the analysis in Budge & Keman 1990, which enables comparative scrutiny. The data in EJPR only formed the basis for an examination of the events with the further help of articles in major newspapers at the relevant periods of time.

On several occasions the summaries below deviate from the categorisations of both EJPR and Budge & Keman. For instance, Irish prime minister Lemass' resignation was classified in EJPR as 'due to health reasons'. According to primary sources like Irish Times (November 9, 1966) that was not the case. The earlier resignation of Lemass in 1961 has also been re-classified from the category 'voluntary' to 'caused by general elections'.

Table 13. THE TERMINATION OF GOVERNMENT IN FOUR SYSTEMS 1945-1990

The proportions of the different categories expressed in number and per cent.

| REASONS FOR GOVERNMENT TERMINATION: | | | | | | |
|-------------------------------------|---------------------------|--|---|--|--|------------------------------------|
| | | 1. TERMIN. DUE TO GEN. ELECTIONS | 2. THE PM'S 'VOLUNTARY' RESIGNATION | 3. PM'S RES. DUE TO HEA- LTH REASONS | 4. DISSEN- SION WITHIN THE CABINET | 5. NO PARLIA MENTARY SUPPORT |
| A. | U K (n=17) | n (12) 70.6 | (3) 17.6 | (2) 11.8 | - | - |
| B. | I R E (n=17) | (7) 41 | (4) 24 | - | (1) 6 | (5) 29 |
| | A + B average: | 5 6 | 4 2 | (6) | (3) | (1 5) |
| C. | S W E (n=20) | (14) 70 | (1) 5 | (1) 5 | (3) 15 | (1) 5 |
| D. | D E N (n=25) | (10) 40 | (1) 4 | (3) 12 | (1) 4 | (10) 40 |
| | C + D average: | 5 5 | 5 | 9 | 1 0 | 2 3 |
| t o a | t (n=79) | (43) | (9) | (6) | (5) | (16) |
| | Total% | 54 % | 11 % | 8 % | 6 % | 20 % |

Source: EJPR, June 1993 (special issue on political data), Keesing's, various newspapers (listed in the bibliography)

Rounded figures where appropriate

6.3.1 The Conundrum of 'Voluntary' Resignations

The pivotal question is what *lies behind* the figures in the table above? Category two, resignations that on face value have been counted as 'voluntary', is an example of a category that has to be scrutinised in more detail. This category includes the important possibility of being deselected from the party leadership and, thus, from the national premiership. If, for instance, a prime minister resigns as the result of a scandal, the resignation would be

classified as belonging to this category. If the prime minister would decide to cling to power and it eventually leads to dissension within the government or the loss of confidence in parliament (or both, compare Irish premier Reynolds in late 1994), the resignation would be classified accordingly as category four or five. The *party-internal* position that the leaders of the major parties enjoy has been examined in detail in chapter four; *ergo* it has to be examined whether prime ministers *de facto* have had to step down as a result of lost party leadership.

In Britain there are three cases mentioned in category two. The first refers to the stepdown of Churchill in 1955, which was relatively undramatic and also partially could be described by category three, health reasons. The stepdown was, however, followed by a general election some time later. Wilson's resignation in 1976 is the second event referred to in this category. The stepdown had an unclouded rationale. After two periods in office Wilson's decision was made clear by favourable circumstances and a long cognitive process as manifest in his resignation speech to the House of Commons. The third case is the resignation of Mrs Thatcher, which indeed was 'voluntary' only formally, but was brought about by the party leadership election in the autumn of 1990. Mrs Thatcher had already secured a majority of the eligible votes, but was forced to a second round by party rules, which required a victor to obtain a majority *plus* 15 per cent to ensure a consensual outcome for the party. The case of Mrs Thatcher is thus the only-clear cut case of a prime minister, a doubtlessly powerful one, who has had to step down because of a change of the party leadership during the party's governance. The withdrawal of Mrs Thatcher is the only available post-1945 example of party-internal deselection in any of the four concerned political systems.⁷⁰

⁷⁰ There is another unique situation in recent British politics. John Major triggered a party leadership election in June 1995 by resigning as the Conservative's party leader. However, he was willing to resign the prime ministership only after losing this internal election (which he eventually won; see chapter four).

In post-1945 Irish politics there have been four cases of premiers' resignations that at face value have been voluntary. The first is unproblematic. It was the occasion when de Valera became president in 1959. His successor, prime minister Lemass, resigned (voluntarily) in 1966 "... *retiring for [undefined] political, not health reasons*" and promised to stay in politics "at least until the next election."⁷¹ The stepdown of Lynch in 1979 also, at least formally, had a consensual character and be seen as voluntary. The resignation took place two years before the general election, which gave plenty of time for the successor to build up a credible position as head of government. The successor and 'strong leader' Haughey stepped down in 1992 in the aftermath of a political scandal, which makes his case belong to the same category. All these four Irish prime ministers were leaders of the Fianna Fáil party.

In Sweden there has only been two voluntary post-1945 resignation of a prime minister, the 1969 stepdown of Erlander after a very long leadership at the apex of Social Democratic power (1946-1969) and the Carlsson succession of Persson in 1996. On the first occasion there were several conceivable pretenders to the party leadership, most notably Gunnar Sträng and Olof Palme - the latter being the eventual choice of the party conference. In the case of the 1996 change, Carlsson had announced his intention to resign the leadership already eight months previously and Persson was elected party leader in an uncontested party congress election.

The scarcity of examples also goes for Denmark. In 1972 the Danish prime minister Krag stepped down after the Danish vote in favour of membership of the EEC, and hence in the government, with the words "*it actually is a good time to go*".⁷²

6.3.2 Health Reasons for the Premier's Resignation?

The third major category, a stepdown because of health reasons, is a necessary component to see the premiers' resignations in a clear light. In the UK the two cases in the table are the resignations of the Conservative leaders Eden (1957) and Macmillan (1963). Both cases of

⁷¹ Both citations from *Irish Times* (November 9, 1966).

⁷² *Berlingske Tidende*, September 19, 1972.

resignation and government termination were primarily caused by health reasons. Both prime ministers had been undergoing extensive medical treatment before their stepdown. With Macmillan the King Edward VII Hospital became famous as the site for consultations on who the successor would be.⁷³ In Ireland there are no clear cases of stepping down from the premiership for obvious health reasons. The Swedish case is the opposite. The only case of a resignation 'due to health reasons' (for the lack of a more adequate category) is the assassination of prime minister Palme 1986. There are more cases of death in office, non-violent however, accounted for in Scandinavia. In Denmark the leadership of two Social Democratic leaders and prime ministers came to an end in this way. Prime minister Hedtoft died suddenly during a Nordic Council meeting in 1955 and only five years later prime minister Hansen passed away in office. The health of the Danish Social Democratic leaders is put in an ever more dubious light by prime minister Kampmann's resignation only two years later, in 1962, after suffering two successive heart attacks. Accordingly there is, overall, strong empirical evidence for the adequacy of the cases classified as belonging to this category (compare the somewhat different classification of *European Journal of Political Research*, June 1993). This simple conclusion is significant as the category of resignation 'due to health' without too much imagination could cater for resignations for various political reasons that formally require another neutral political label.

As a general verdict on the post-1945 era in these four systems, few prime ministers indeed have been *forced* to resign for reasons other than purely parliamentary politics. Churchill and Wilson (i.e. the second time 1976) stepped down voluntarily (Churchill was seen as reluctant). The number of premiers forced to go is insignificant if one counts only the cases where a prime minister has been deselected: the only case is the British Conservatives' party leader election in 1990 when Mrs Thatcher had to step down after the possibility of a humiliating defeat in the election's second round loomed large. In a comparative post-1945 perspective it is hardly surprising an outright deselection of a leader has occurred in the British Conservative Party. *Yet, in conclusion, party-internal politics have played a minuscule role when it comes to the replacement of national premiers.* In Ireland, Sweden and Denmark there is hardly any empirical evidence of such events at all (Irish premier Haughey resigned after

⁷³ *The Times* and *The Daily Telegraph* (October 16, 1963).

a scandal in 1992 as did Danish premier Schlüter in 1993, but on neither of these two occasions did the parties play any explicit role). This all makes sense since chapter four [on the party leadership] showed the party leaders enjoy structurally different but all strong and relatively safe party leadership seats within their respective parties. This strong party-internal position significantly contributes to explain why table 13 above shows the number of *de facto* ousted premiers is small.

One has to ask whether the premiers' strong institutional positions have contributed to focus ambitions to replace the leader on personal networking rather than institutional means. At least two arguments can be made to shatter this line of thought. If the proportional number of premiers who have resigned for either generally 'voluntary' or specifically 'health' reasons had been significantly high, this thought would indeed seem plausible. However, as presented in table 13, this has not the case. In the two Nordic countries a total 10-16 per cent of the premiers have resigned for either 'voluntary' reasons or health, including death in office in Sweden and Denmark. Neither did these figures in a closer case-to-case scrutiny above show signs of being cover-ups up for other underlying political reasons for a stepdown. The figures can be taken at face value.

6.3.3 Dissension Within the Government

Termination classified as category four, government dissension, deserves separate scrutiny. In the UK there is no clear post-1945 case of government termination caused by cabinet-internal contention. In the Irish Republic there is only one case during the period 1945-1990 (however, a recent example is the resignation of the Reynolds cabinet in January 1995). On this one occasion Labour left the Labour-Fine Gael coalition because of dissension on public expenditure cuts (in December 1994, Irish Labour left the Fianna Fail-Labour government because of a controversial judicial appointment by premier Reynolds). The picture is different in the Nordic block. Post-1945 Sweden provides three examples of clear cabinet-internal conflicts. In 1957 the Agrarians withdrew their support from the two-party coalition headed by the Social Democrats' Erlander. Mr Fälldin, the leader of the Swedish Centre Party (i.e. the renamed Agrarians), was the focus of two later cabinet-internal crises in 1978 and 1981.

In 1978 premier Fälldin's key proposals were rejected by his cabinet, which led to the rare event of a premier resigning from his cabinet over an internal dispute (usually the minority coalition partner withdraws its support). In the later 1981 crisis ministers from the coalition partner resigned over the, at the time, highly controversial issue of tax reform. On close examination only one similar occasion can be registered in Denmark over the period 1945-1990, which in itself is remarkable (in Sweden three governments resigned because of internal dissension). Denmark has often been seen as a foremost example of a political system where variance in coalition elasticity has explained a good deal of the governments' nominally short duration.⁷⁴ The Liberal Democrats brought the government down in 1979 as they, the only coalition partner, walked out of Social Democratic premier Jørgensen's cabinet because of a disagreement on how to implement a prices and incomes policy.⁷⁵

6.3.4 Is 'Lack of Parliamentary Support' What It Seems To Be?

Category five is yet another superficially clear-cut category of reasons for government termination which from a closer distance can shed additional light on the position of the national premier. In two of the four systems, the Irish Republic and Denmark, there has been a relatively frequent withdrawal of parliamentary support (especially in Denmark), which has concluded in the collapse of the government. The most famous and internationally cited example is Denmark, a political system which has extensively relied on minority cabinets (nine cases accounted for during the period 1945-1990). In Ireland an almost equally large proportion of cabinets have been terminated for lack of parliamentary support, whereas there is no example in the UK.

⁷⁴ Budge & Keman 1990.

⁷⁵ In the July 1993 issue of EJPR two terminations caused by internal dissension were recorded over the same period, the other being the stepdown of the Jørgensen's Social Democratic minority cabinet in 1982. However this second event should be classified more adequately as 'termination caused by lack of parliamentary support' (the table's category five) since the single-party minority cabinet had to resign after failing to negotiate a parliamentary adoption of somewhat controversial economic proposals (see, for instance, *Keesing's Contemporary Records*, p. 31788 (1982 volume) and its further press references).

In Sweden only one such occasion is accounted for. This event was the constitutionally peculiar occasion when the withdrawal of parliamentary support produced the (formal) collapse of the government (the first Carlsson government in 1990).

The key question about this category is not about the nominal termination of governments, but rather whether the collapse of the government led to a *de facto* change of government. On some occasions parliamentary withdrawal of support led to a change only *de jure* with the same persons, most notably the prime minister, being able to continue in office after carrying out a minor cabinet reshuffle or, alternatively, a redrafting of the government agenda. The systems show very different characteristics. In Ireland strict collectivity enters the analysis once again: the withdrawal of support has always led to a *de facto* change of government; there is evidence of such a change on five occasions.⁷⁶ In Denmark, on the contrary, there has been a clear withdrawal of parliamentary support on no less than ten occasions, but out of these ten only three led to a change of government. In six out of nine cases over a considerable period of time the same premier was able to carry on in office with some portfolio reshuffles or other minor changes.⁷⁷ Furthermore, the premier could carry on after changes, as for all Danish cabinets from Krag's resignation in 1968 to Schlüter's in 1993. The Danish Conservatives' long-time leader and prime minister Schlüter was a master at renegotiating and re-installing 'his cabinet' in office, something which he was able to do a total of three times during the 1980s before he was brought down by involvement in a political scandal in 1993.

The only Swedish instance deserves investigation because of its consequences. In 1990 Social Democratic premier Ingvar Carlsson lost the support of parliament, and thus the one-party

⁷⁶ These *de facto* terminated cabinets are: Costello 1951, de Valera 1954, Costello 1957, FitzGerald 1982 and Haughey 1982 (also the Reynolds cabinet 1995).

⁷⁷ The ten cabinets terminated by parliamentary no-confidence are: Kristensen 1947 (CHA), Hedtoft 1950 (CONT), Hedtoft 1950 (CHA), Krag 1968 (CHA), Jørgensen 1977 (CONT), Jørgensen 1981 (CONT), Jørgensen 1982 (CHA), Schlüter 1984 (CONT), Schlüter 1988 (CONT), Schlüter 1989 (CONT).

(CONT=the premier managed to continue in office, CHA=a leader change occurred).

cabinet resigned. After over a week of constitutional and political vacuum the cabinet 'reappeared' and, as the Swedish constitution requires a majority to vote against the premier-to-be for him not to become prime minister, Mr Carlsson was reinstalled in office. This incident drew some attention, as the Instrument of Government did not provide any directives on how this parliamentary crisis should be handled. Thus there is support in several ways in the two Scandinavian systems for an 'invincibility thesis': even the termination of a government need not imply the real end of the term in government, and, most notably, for the party leader and prime minister. This aspect often seems to have been neglected in descriptions of systems.

The data in the *European Journal of Political Research* separated a subsequent category of government termination: termination caused by intervention of the head of state. This category is not mentioned in the table above, since it has no explanatory value in these four systems. There would be no cases in this category.

6.3.5 The Termination of Cabinets: Some Conclusions

The termination of a government is always as special an event as it is inevitable. For the premier it is a last resort. The most important reason for cabinet termination is a general election. The different systems of Britain and Sweden represent the same high proportional figure of government termination caused by general elections. However, if these figures in the table above are split between politically-timed versus periodically-fixed elections (i.e. elections due with a regular interval as prescribed by the constitution), the two political systems represent different extremes. Terminations nominally caused by general elections are to an entirely different degree determined by the prime minister. However, the prolonged mandate of the Swedish parliament (formerly three years, since 1.1.1995 a four-year mandate) is to some extent likely to increase the possibility of politically fostered general elections in Sweden.

The Invulnerable Prime Minister?

The table in this chapter section shows that few governments are brought down *without* the outright consent of the premier. General elections represent a category of either politically-motivated elections, as decided by the premier in Britain, or a politico-legal *force majeure*, as in Sweden (70 per cent in both cases). Furthermore, a government stands a fair chance to stay on in office in well-timed elections. The most apparent case of government termination which neither was anticipated nor controlled by the government, was the Danish 40-per cent termination figure caused by parliamentary no-confidence. However, the very same politicians - and premiers - stand an ample chance of eventually carrying on in government with only minor, sometimes only programmatic, changes. Only three out of ten Danish cabinets that resigned because of lost parliamentary support were followed by reasonably different cabinets. The likelihood of such a continuation is much determined by the political system and its position on a scale of *adversary* versus *consensual* politics (Denmark representing highly consensual politics). With a different emphasis one could give Danish parliamentarism a high score: 80 per cent of the cabinets have terminated for parliamentary reasons, which is the highest figure amongst the four systems (category 1 + 5).

When it comes to the withdrawal of support (table categories 4 -5), it is important to make a distinction between one-party and coalition governments. There is hardly any evidence that one-party cabinets, be they majority or minority cabinets, have been brought down by the withdrawal of parliamentary support. This is perfectly comprehensible in a system like Britain. However, the antithetical case of Sweden shows that even minority one-party cabinets (the long-time Social Democratic single-party cabinets) do survive severe parliamentary pressure. There is only one unclear example of a government being brought down by the lack of parliamentary support in Sweden. Even in that case (Carlsson I, 1990) the same Social Democratic one-party cabinet returned, in an only slightly changed composition, to continue in government. This difference between nominal and real cabinet termination is important.

The only real cases of loss of parliamentary support are therefore provided by the Irish Republic and Denmark. Even in Denmark the very same government was able to carry on in office after a formal resignation with only minor changes, if any at all. On only 33 per cent

of the occasions when Danish governments were classified as terminated because of loss of parliamentary support (category five) was there a *de facto* change in the government's political colour and a different premier headed the next government. On several occasions the change of a controversial bill's wording was enough. Ireland represents a wholly different tradition: all governments 1945-1990 that were brought down by lack of support led to a change in office (hence both Fianna Fáil governments and Fine Gael-coalitions). Thus, majority or minority single-party governments are hardly brought down by parliament at all, whereas coalitions, be it majority or minority cabinets, can be brought down - but often managed to continue in office (Ireland being the deviant case). To point to only the duration of governments as an indicator of anything other than formal political stability is too crude. It is of vital importance to make a distinction between being able to put pressure on the government and to be able to *substitute* it with another government. From a broader comparative perspective, the unlikeliness of a British premier returning to office after once stepping down becomes another deviant case.

Dissension within the government (category four) seems to be of minuscule importance, Sweden has the highest rate of termination for intra-cabinet reasons with its 15 per cent, but the percentages represent only three cases during 1945-1990. Most of these cases have been of an unavoidable character. Two out of three cases in Sweden are explained by contention over nuclear power during the relatively unstable coalition governments 1976-1982. Denmark, with its frequent post-1945 minority coalitions, adds only two clear cases of government termination caused by internal dissension. Such a small number of cases of termination for intra-cabinet reasons are possible only with the help of a strong consensual climate.

Another question on the termination of government is how a cabinet with a different party composition can be formed without a general election? This question marks a fundamental difference between majoritarian and consensual political systems. In systems that rely on the parliamentary (single-party) majority for the execution of government business, a change in the cabinet's political colour not endorsed by the electorate remains only a theoretical possibility. In the most classic, and theoretical, form of parliamentarism the executive's disputes are taken to the people for a verdict by dissolving parliament, or a sovereign parliament has the cabinet reshuffled by votes of no confidence in one or several ministers.

Most constitutions do not, however, explicitly exclude the possibility of forming a new government on approximately the same foundation, nor the possibility of entirely altering the basis of the cabinet without a general election (as long as it passes the votes of investiture, if any, in parliament).

6.4 The External Dimension: Some Conclusions

One of this thesis' original features is to view the cabinet as a core unit of analysis for the purpose of examining the prime ministership's position in the political system. In doing so it first dealt with the dynamics within the cabinet and now, in this chapter, with key aspects of the dynamics outside cabinet. The study has concentrated on a central institutional aspect of national policy-making, the executive-legislative implications for the premiership, and, second, on the prime minister's role in international policy-making, which will be briefly commented upon below.⁷⁸

One way of approaching the relationship between the premier and parliament is to concentrate on the premier's appearance in parliament, as Dunleavy and Jones *et al* have done in their examination of the frequencies of premiers' appearances in the British Commons. This emphasis on appearance is enabled by the fact that the parliamentary policy-making process is a constant in majoritarian systems. When the *political bargaining aspect* of law-making is downplayed in parliament, the role and appearance of the premier tend to become institutionalised. If the premier's historical role has been prominent, this institutionalisation is likely to create a high profile role in parliament, as in the British Commons. There is, however, no reason to believe the premier's appearance in parliament will take on a certain character according to typologies of legislatures, the historical role of the premier is a decisive factor for determining the institutional profile. In the Swedish post-1945 era the premier has for long periods been able to cling to only an implicit parliamentary majority.⁷⁹ This

⁷⁸ It should be noted that this section does not make any general comments on government termination (see 6.3.5 above).

⁷⁹ 'The block majority', mainly consisting of the left of the party spectrum.

scenario could have been thought to force the premier to a more active role in parliament. However, this has not been the case. Under the Swedish governments 1976-1982 the premier was not forced to increase his presence in parliament and the bills continued to pass the *Riksdag*; the prime minister was not forced to change his role to correspond to a changing parliament. The Danish premier, who often has been in charge of neither the parliamentary agenda nor of a parliamentary majority, has not been forced to take on a permanently visible role in parliament: parliamentary questions to other key ministers outnumber the questions put to the Danish prime minister. As an institution the prime ministership is so synonymous with the core of executive power and bears such a historical weight that changing political contexts have changed the institution only incrementally.

Two aspects have to be separated. First, the Danish premier has at times been forced to seek support in parliament from issue to issue (and from different parties), which has contributed to an overall low level of 'solidified', i.e. institutionalised parliamentary appearances (in comparison with Britain). Second, such circumstances have not contributed to an active or visible overall prime ministerial role in the Scandinavian parliaments. The premier's need to take parliament into account, e.g. as head of a minority cabinet, has kept the premier's parliamentary role flexible: Scandinavian systems allow a greater freedom for the premier to create his own political role. If institutionalised forms of parliamentary appearance exist, like PMQs in Britain, different prime ministerial styles seem to be highly likely to be channelled through existing institutional arrangements rather than towards changing the arrangements.

Regardless of the system's character the prime minister has been able to survive difficulties in parliament well. For example, Danish premier Schlüter's long-time survival in office, in spite of persisting political problems, can only be explained by an optimal match of personality and institution. As much as a Westminster premier at his/her best can utilise media extensively, the lesser extent of focus on the premier in a consensual system helps him/her to stay in office: the prime minister does not personify the cabinet to the same extent as in a Westminster system. Hence the prime minister's person might be less discredited in a cabinet termination and it is easier to return to the apex of power. Especially the Danish premiership shows that a prime minister can be only a chairman *within* cabinet, but still be a strong outward leader, perhaps a necessity in a system which easily produces minority

governments. The low vulnerability of the prime ministership was equally confirmed by the examination of reasons for cabinet termination (6.3.5).

Based on the four examined systems the premier's position *vis-à-vis* parliament is solid: where institutional arrangements tie the premier to parliament the effect of this linkage is limited, and where this linkage is likely to have more impact on policy-making the premier's bond to parliament is looser. In Ireland, and especially in Scandinavia, it is relatively easy for the premier to keep a low parliamentary profile. In Sweden the separation of the executive and the legislative spheres is institutionally enhanced through the rule that cabinet members cannot be members of parliament. Within each system the patterns of prime ministerial performance are relatively constant, and have changed little with different personalities and times. The style of performance in parliament changes, but not the general pattern and frequency of the performance. In Britain premiers operate at a greater distance from parliament, which is seen in the frequencies of appearance apart from the PMQs. Furthermore, the premier's performance is centred around prime ministerial questions in all four systems, although there are many other ways in which the premier may act in parliament -statements, speeches, intervention in debates.

The setting of the parliamentary agenda is another example of two different traditions. The parliamentary agenda can either be placed in the hands of the executive (United Kingdom, Ireland) or be formally apolitical and dealt with by the Speaker (Sweden, Denmark). The agenda-setting can at times be utilised by the cabinet, most often it is of a politically neutral character and very seldom can it be used against cabinet. Parliamentary agenda-setting is unlikely to play the role of a constraint against the executive.

Parliament seems to have a conjunctural role for the premier. Only at certain times has the premier to make *substantial* appearances: most often they are of a *symbolic* character - a means of formally establishing bonds between the executive and legislative branches. The difference between substantial and symbolic appearances lies in how they affect political outcomes. Even the British PMQs (prime minister's questions) are little more than highly politicised information exchange contributing to the general perception and reputation of the premier.

An Increasingly Important International Role

The premier's increasingly important role as a decision-maker on the international and supranational level will be discussed further in the concluding chapter, but all indicators show that the international obligations act as 'authority-enhancement' rather than *vice versa* particularly because of the distance between international and national decision-making (see the chapter section 6.2). When one looks at the reasons for government termination, there are few examples of significant disputes about international issues. Governments have generally not been brought down by international issues; however, the expansion of the EU's *aquis communataire* could make such dissent more likely.

International politics can often become a means to assist domestic political interests. Different schools of thought in international relations have long argued about the relationship between international and domestic politics. Be the outcomes in international politics caused by lowest-common-denominator bargaining between states or the logic of the spillover effect, the *results* can usually with ease be used by the key players for domestic purposes.⁸⁰ This effect can be obtained by taking credit for achievements - if the international achievements are seen also as achievements from a domestic perspective - or, if the goals of these spheres seem to contradict each other, by taking distance to the issue(s), or, traditionally, by blaming other actors. Both are simply different ways of utilising the intangible distance between national and international politics. One system, Denmark, provides an arresting exception to the rule: the *Folketing*'s European Affairs Committee effectively reduces exactly this distance and puts the prime minister on an equal basis with his cabinet colleagues, albeit only for EU issues.

The overall international engagement of the premier has increased significantly during the period 1945-1990, and continues to do so. All four examined systems belong to the EU which implies the premier's role is pivotal and different from that of fellow cabinet ministers in, at least, two ways. First, the premier's role is as the ultimate representative of the cabinet at summits, which makes his/her status different from that of other cabinet ministers who deal with international issues of an everyday meso-level character. Second, the international

⁸⁰ Moravcsik 1991, see especially pp. 655-659.

meetings and summits the premier attends have changed in character over the last 15 years. There are more of them and they proportionally deal with a broader range of issues. Increasingly decision-making is carried out at these meetings, particularly within the EU framework (compare the CFSP pillar of the Maastricht Treaty which is dealt with intergovernmentally). Contrary to the premiers' various domestic circumstances the international stage is a sphere of power where the institutional changes have had a very equal effect on the different prime ministerships.

However, if one wants to explain the outcomes of the international institutions one has to return to the premiers' domestic freedoms and constraints - to the other parts of this study. Nonetheless, in international politics all prime ministers are at least a *primus inter pares*.

7. THE PRIME MINISTERSHIP: TOWARDS A GENERAL ASSESSMENT

"Because the same or similar term, prime minister, is used in so many different countries, there is a temptation to suppose that the persons known as prime ministers in different countries must have similar powers and play similar roles. Nothing, it turns out, could be further from the truth. If the prime ministers of different European countries were to devote one of their summit sessions to comparing notes on their different offices, they would probably get a considerable shock. A power that one prime minister takes for granted is beyond another's wildest dreams."

A. King 1994¹

7.1 The Office of Prime Minister Compared: Introduction

This study explains variations in the 'prime ministerial component', which recent scholarly attention has noted.² Several studies of elite bargaining have emphasised the key players' institutional constraints and freedoms, however without sufficient specification or analysis.³ These institutional factors are the focus of this study. This study is not about leaders, but about leadership and, especially, about the institutional prerequisites for national leadership. The thesis has explored three central explanatory dimensions: the role of the constitutional conventions, the party leadership and the cabinet system (divided into two separate parts: cabinet-internal and cabinet-external determinants). The preceding four chapters have dealt with these dimensions and compared them between the UK, the Irish Republic, Sweden and Denmark. This concluding chapter summarises the comparisons and draws some theoretical conclusions about the premiership, what it is and can be. It addresses some frequently utilised concepts like prime ministerial *styles* and *roles* and integrates the detailed information in chapters three to six with the theoretical context of chapter two. The point of departure was two binary analyses of political systems. How did the systemically matching pairs eventually match for the premiership? Which institutional aspects are common, and which are exceptional? Is there a prime ministerial *modus operandi* and how does King's presumption above fare in the light of this study?

¹ King 1994, p. 151 (this quotation is earlier referred to in chapter one).

² See, e.g. Müller, Philipp and Gehrlich in Blondel & Müller-Rommel 1993 (eds.).

³ E.g. Moravcsik 1991 and Putnam 1988.

7.2 Summarising the Examined Dimensions: Differences and Similarities

An overall estimation of the dimensions in chapters three to six has to be made in order to proceed towards institutional system profiles. These dimensions are summarised in one single table, table 14, to show which dimensions that, from a comparative view, are crucial for each of the four offices of prime minister. Some dimensions are crucial for the premiership because they represent a different level of prime ministerial autonomy than the other main dimensions. For example, if one dimension represents a lower level of autonomy it constitutes a vulnerable element of the leadership profile. This assessment is related to the cruder concept of 'prime ministerial vulnerability' which Weller tried to cover in his book on Westminster prime ministers.⁴ In this way Weller approached the elusive concept of 'prime ministerial power' - the ultimate core of the debates on the office. For Weller the influence and vulnerability of a prime minister are dependent on the prime minister's accountability -towards party, cabinet and parliament.⁵

However, in his final 'job description' he does not see the premiership from a perspective that simultaneously encompasses several different dimensions and, thus, does not develop a further conceptual framework like leadership profiles. Weller's study nevertheless attempts to encompass most aspects of the premiership, behavioural and institutional. His study dealt with how prime ministers interact and exert control over other people.⁶ The role of this study is more focused and theoretical. It attempts to define the institutional setting and the institutional prerequisites for prime ministerial leadership. The institutional arrangements create prerequisites for a more or less dependent position, for exerting a higher or lower degree of influence and intensity on issues and policies. How do the dimensions of invulnerability-vulnerability and autonomy-dependence relate? The autonomy-dependence dimension catches the institutional capability of action, whereas the invulnerability-vulnerability dimension is narrower. Vulnerability, explicitly or implicitly, points to leadership being terminated (e.g. through party leadership elections or a loss of confidence in parliament). However, a prime minister can be invulnerable and still have to act within a narrow scope, because of, for instance, constitutional arrangements. Weller's concept of vulnerability needs

⁴ Weller 1985.

⁵ Ibid., chapter nine.

⁶ Ibid., p. 203.

to be complemented to understand the role of the premiership in a political system. The autonomy-dependence dimension caters for both the extent of vulnerability in office and the extent to which the national leadership equals the prime ministership.

The two crucial dimensions of *competence* and *dependence* (alternatively independence), employed in chapters two and three, embody the conceptual essence for understanding the capability of the prime ministership. For this reason this study dealt at length with constitutional arrangements. A low vulnerability is a necessary but not sufficient condition for establishing the prime minister as a key actor, not only constitutionally but also as for *de facto* policy-making. A prime minister who is entirely invulnerable but who, at the same time, cannot influence outcomes because of a lack of institutional competence is a realistic alternative, as is shown in this study with the Swedish and Danish premierships (see especially chapters three and four).

The next page presents an autonomy-dependence heuristic which illustrates the information in chapters three to six. The table displays a general assessment and the specific components of the general assessment in each chapter/country box. Throughout this study there are tables at the end of the chapters that summarise the information of that chapter. The table below is based on the these earlier tables and also makes references to them.

Table 14. TOWARDS THE CONSTRUCTION OF SYSTEMIC LEADERSHIP PROFILES

An autonomy-dependence summarization based on chapters 3-6.

| EXTENT OF AUTONOMY IDENTIFIED | | | | |
|--|---|---|--|---|
| | U K | I R E | S W E | D E N |
| CHAPTER 3: (Tables 1-4) CONSTITUTIONAL ASPECTS: Appointment of ministers, dismissal / cab. formation: Dissolution of parliament: Indep. from a pouv. neutre: | HIGH | HIGH (Tab 2) | MEDIUM HIGH (Tab 1-3) | HIGH (Tab 1-3) |
| high high high | high high med. high | med. high med. low high | high med. high high | |
| CHAPTER 4: (Tables 8-9) THE PARTY LEADERSHIP: based on: -the electorate's size -tenure: 1 year or longer? -formal challenger needed? -govt/opposition distinct? -other crucial conjunctures | Lab: HIGH ↑ ↓ Con: MEDIUM (no specifications) | FF: MED. LOW (HIGH) ↓ FG: HIGH | SocD: HIGH- MEDIUM ↓ Mod: HIGH- MEDIUM | SocD: HIGH - MEDIUM ↑ Con: HIGH- MEDIUM |
| CHAPTER 5: (Table 12) THE CABINET-INTERNAL ASPECTS: Cabinet chairmanship: Cabinet agenda-setting: Cabinet decision-making: Cabinet recompositions: Cabinet committee struct.: | HIGH | HIGH | MEDIUM LOW | MEDIUM LOW |
| high high high high high | high high high med. high n.a. | med. high medium med. low med. low n.a. | med. high medium med. low med. low low | |
| CHAPTER 6: THE CABINET-EXTERNAL ASPECTS: The PM & nat. parliament: The PM and the international political scene: | HIGH | HIGH | HIGH | MEDIUM HIGH |
| med. high high | high high | high high | med. high med. high | |

H=High, M=Medium, L=Low autonomy (five-step scale: H-MH-M-ML-L)

The chapter/country-boxes contain two parts: the general evaluation and the specifics.

systemic profile

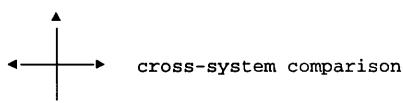


Table 14 is only a guideline for the concerned institutional practices but makes a heuristic summarisation of the autonomy the different dimensions allow the premierships in the four systems. The horizontal perspective provides a cross-system comparison in general (and of some main sub-variables), whereas the vertical perspective constitutes the basis for systemic leadership profiles, which will be elaborated further.

Crucial dimensions of leadership are not only the dimensions that allow a different degree of institutional capability than other core dimensions. Some dimensions also allow a much greater scope of variation than others, which can be the source of considerable volatility. This is not true of all dimensions that allow considerable institutional autonomy; autonomy does equal volatility. Some dimensions of the leadership allow autonomy of decision-making but also institutionalise the premier's involvement on a high level, leaving little scope for volatility.

Crucial dimensions are therefore easier to define than to fully explain. This argument is best exemplified by the party leadership dimension. For instance, in Ireland the elusive party leadership elections create a considerable variation in the premier's autonomy (particularly Fianna Fáil; see chapter four). For this reason it is so important to simultaneously include several core dimensions in a political analysis of the prime ministership. If one dimension is institutionally inconclusive, it is highly likely that the level of autonomy of other core dimensions provide guidelines for what implications the potentially volatile dimension might have. Because the four prime ministerships generally have enjoyed autonomous positions institutional freedoms have been utilised whereas several constraints have remained theoretical.

The institutional arrangements are neither rational, nor autonomous nor constant. The formal powers are a necessary but by no means sufficient part of the analysis *as the institutional prerequisites for using formal powers can vary considerably within a system*. Table 14 is an attempt to identify loci of power and variation within and across systems. One example is a comparison of the constitutional and the cabinet-internal aspects in Sweden and Denmark, both of which point to a discrepancy and the necessity of going beyond an examination of only constitutional powers. This is also a matter of level of analysis: the role of a key actor/institution in decision-making is best

analyzed on a medium-level, in between a narrow analysis of formal powers and a broad analysis of most systemic political conditions.⁷

The conclusions can be related to the institutionalist debate. The concept of 'autonomy of institutions' is important in the neo-institutionalist argument.⁸ This autonomy is the partial basis for the crucial role institutions are seen to play, to an extent of shaping preferences within the arena rather than just being the arena that sets the ultimate limits for action options. Indeed prime ministers sometimes have fewer, sometimes more, options available by the rules of the game, but in the light of the conclusions above one cannot say that institutional capabilities shape particular preferences concerning the office of prime minister. Circumstantial factors shape preferences within institutional limits.

"... instead of speaking of the sufficiency of certain institutional arrangements, it is more appropriate to speak of opportunities they provide for strong capabilities when other conditions are present to facilitate those opportunities."⁹

Most of the institutional sub-dimensions in table 14 *could* swiftly undergo significant change. However, changes extensive enough to cause an overall transformation of the premiership's role in the political system are highly unlikely (partially because any such changes have to be endorsed by the premier himself/herself in a prime ministerial system). An important feature of institutional arrangements - that collectively constitute the institutional leadership profile - is their *interdependence*. The premierships have previously often been dealt with from only a singular perspective: in a purely behavioural context or as depicted by constitutional law. To understand a key political office the different institutional aspects in chapters three to six have to be compared across systems. Only then do systemic leadership profiles emerge and the concept of 'institutional leadership profiles' can be brought forward. Beyond explanatory and clarifying functions a

⁷ See also Weaver and Rockman 1993a, p. 10, who write about different 'tiers of explanation of differences in government capabilities'.

⁸ March & Olsen 1989.

⁹ Weaver & Rockman 1993b, pp. 446-447.

definition of these institutional limits helps deliver predictions in specific contexts (e.g. how is the premier likely to deal with a party leader challenge or a vote of no-confidence?).

There are institutional leadership patterns rather than constant leadership arrangements. Instead of pointing to only one sub-dimension profile, one has to cover a likely systemic *maximum* and *minimum* institutional leadership profile. One way of achieving this is to relate the conclusions to the theoretical typology presented in chapter two (figure 5).

Figure 12. INSTITUTIONAL LEADERSHIP PATTERNS: MAXIMUM AND MINIMUM

| | | | | 1. THE CONSTITUTIONAL DIMENSION | | | |
|---|--------------------------------------|---|---|---------------------------------|----------------|--------------------------|----------------|
| | | | | + | | - | |
| 2. T H E P A R T Y D I M E N S I O N | + C A B I N E T | 3. T H E P A R T Y D I M E N S I O N | + | A Presidential leader | 1+ 2+ 3+ | A Manager | 1- 2+ 3+ |
| | | | | UK (maximum) IRE (maximum) | | 1A | 2A |
| | | | | A Compromiser | 1+ 2+ | A Party Directing Leader | 1- 2+ |
| | | | | SWE (maximum) DEN (maximum) | | 3- | 3- |
| | | | | | | 3A | 4A |
| | - D I M . | 3. S Y S T E M | + | A Party Serving leader | 1+ 2- 3+ | A Caretaker | 1- 2- 3+ |
| | | | | UK (minimum) IRE (minimum) | | 4B | 3B |
| | | | | A Lame Duck leader | 1+ 2- 3- | A Figurehead leader | 1- 2- 3- |
| | | | | SWE (minimum) DEN (minimum) | | 2B | 1B |
| | | | | | | | |

(See also the model as presented in chapter two.)

One conclusion from the figure is that the formal constitutional powers have less explanatory value for variation in leadership profiles than the other dimensions. This is one way of displaying the fact that the party leadership dimension is the cause of variation in the institutional prerequisites of prime ministerial leadership. Another conclusion is that the premierships persistently are grouped blockwise, Westminster- and Nordic systems. Tentatively one can state that these premierships represent the two main categories of prime ministerial leadership in Europe, 'chiefs' and 'chairmen'.

In the United Kingdom the prime minister has opportunities to be a 'presidential' leader (1A), as described in figure four [in the methodological chapter], which means all dimensions, as accounted for in the four respective chapters, provide the prime minister with considerable institutional capabilities. This result is not surprising. A maximisation of the leadership profile's potential was practically achieved when Mrs Thatcher was in office 1979-1990. The important point, however, is that to achieve such a political role *all* accounted dimensions have to be utilised extensively, i.e. there has to be a *coherence* between the levels at which different institutional dimensions are and can be utilised. The coherence or non-coherence between the different subdimensions is important. Crudely put, what is the use of being a highly independent and competent actor on one core dimension, if the same actor turns out to be highly dependent on another core dimension? Having an advantageous position constitutionally and in the cabinet system is not enough if the party-internal position is disadvantageous. These aspects are all veto-dimensions which can rapidly undo the leadership.

The considerable, mostly party-internal difficulties John Major has experienced 1994-1997 seem compatible with the comparative results of chapter four on party leadership aspects. A party's internal problems and fractionalisation are not here interesting in themselves: the crucial question is *how party-internal problems are reflected in the position of the party leader(s) through the existing institutional arrangements*. For the British Conservatives the problems have *de facto* been reflected directly by speculation about leadership challenges, which have been made worse by the strong position a Conservative leader potentially could hold (and a premier could hold nationally - at times a considerable disjunction). These speculations are a direct effect of the party rules and the way the party elects its leader: hence party rules matter, but can do so in different ways. The question is whether the rules matter only *passively*, as with speculation about the leadership, or *actively*, when a leadership challenge occurs. Such speculation as within the British Conservatives

would not have been possible in the major Scandinavian parties this study has examined, for multiple reasons. The party leader is elected by a wholly different electorate (the party conference) and any review of the leadership takes place only every fourth year (which, e.g., is explicitly enshrined in the Swedish Moderate Unity Party's rules). The opposite case is that of an Irish Fianna Fáil-leader, who indeed has been able to utilise the uncodified party-leader position (particularly Haughey), but under the present system [1996] the party leader will never be able to eradicate speculation about leadership challenges.

Systemic Reflections

For long-term leadership it would be more beneficial to have a less prominent position on each of the dimensions than a very prominent position on one dimension, as long as all dimensions point in the same direction (compare chapter two, figure three). Of the eight coarse leadership profiles the crucial dimension in Britain is party leadership. By constitutional convention the British premier enjoys a status which exceeds that of a first among equals. The same is true for the premier's position in the cabinet system. Even though both these aspects are based to a great extent on political conventions only, the degree of institutionalisation is considerable. These dimensions have been static, to the premier's advantage.

The British premier is likely to enjoy a position between a presidential leader (1A) and a party serving leader (4B). The other profiles seem less realistic. However, the static character of the leadership profiles in chapter two do not account for one important point. Throughout this work it seemed more and more important to make *a clear distinction between day-to-day politics and certain decisive conjunctures when the premiership is at stake*. The 'worst-case scenario' based on the party-internal dimension should perhaps be relabelled from party-serving to party-observing leadership. The party and its rules matter, but do so especially at certain crucial conjunctures, when the party leadership can be challenged and changed.

The systemic profile of the Irish Taoiseach is in many ways the British case driven further along the same track. Constitutionally the Irish premier's status is indisputable, despite the existence of the office of President. The premiership is fundamentally different from the British in being rigidly codified since 1937 and enjoying some intriguing constitutional features, like allowing the President

discretionary power to decide whether the Taoiseach can dissolve parliament when the parliament's confidence in cabinet is faint. Several of these constitutional sidepaths, like impeachment and the President's discretion, have as of today remained unutilised. O'Leary concluded that the Irish prime minister is potentially more powerful than any other prime minister, with the exception of the British.¹⁰ The Irish case provides more information on the role and volatility of the party leadership. Based on information from both the UK and Ireland it can be concluded that prime ministers-party leaders are hard to shift, with or without rules (see chapter four).

The similarities between the two systems in the Nordic block is on a macro-level as evident as between the two Westminster systems. Out of 12 detailed determinants in table 14, a difference could be found in only three determinants. In comparison to the Westminster systems there is an initial difference in the constitutional construction (especially Sweden), but major differences occur within the cabinet system. The Swedish and Danish premierships fit no category higher than that of a 'compromiser'. The limited resources within the cabinet system, ranging from the cabinet agenda-setting and chairmanship to the insignificant role of cabinet committees, degrade the practical capabilities of the Nordic premiers. Looking specifically at the cabinet committee structure, out of the four systems only in Britain does the cabinet committee structure play a considerable role.

7.3 Institutional Leadership Profiles: Towards a Theory and Explanation

"The relationship between these institutions is complex and their effects are almost always countervailing. And, yet, the sum of these relationships and their effects produces a distinctive pattern of political leadership."

R. Elgie 1995, p. 204-205.

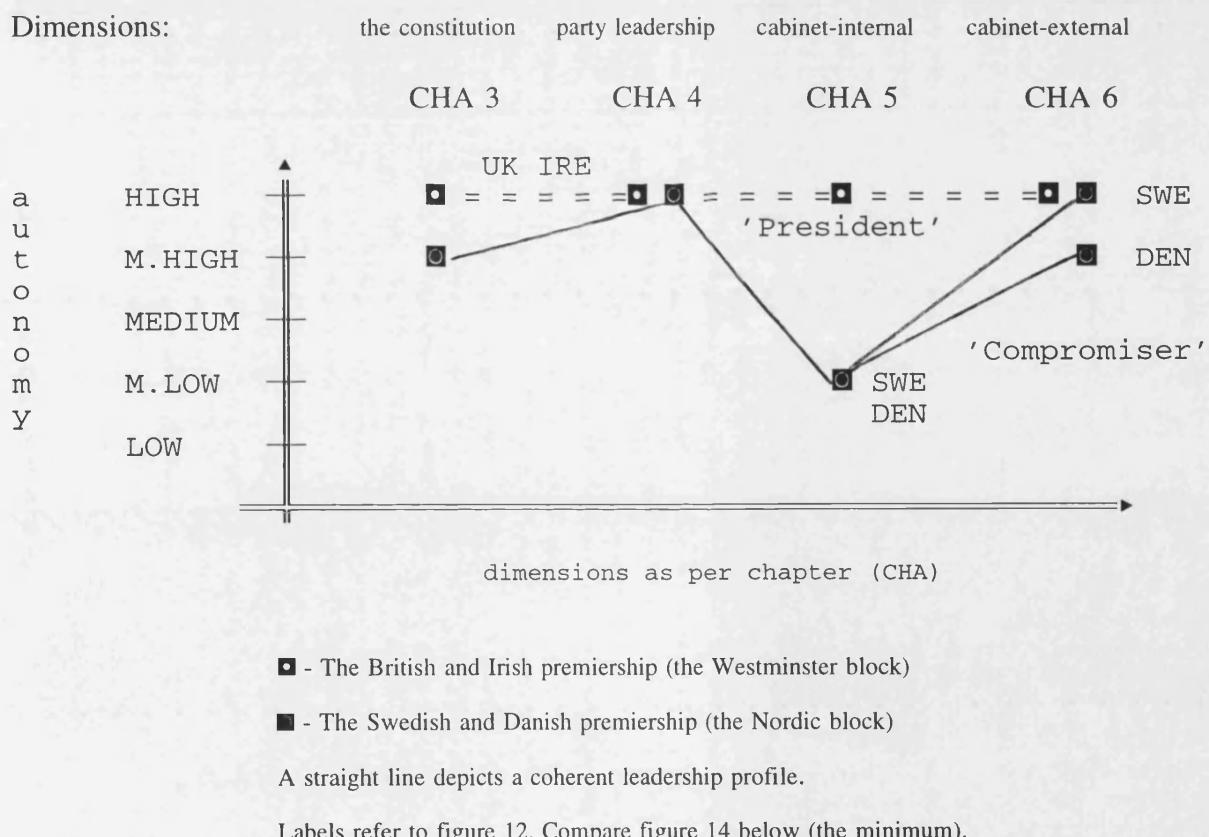
Following on the argument above, the four main dimensions provide the basis for further analysis. The leadership patterns will be analyzed from different perspectives using figures to illustrate institutional leadership profiles, that is the systemic profile of prime ministerial autonomy. The dimensions have to be weighed on a uniform scale which in this case is the extent of autonomy the premiers enjoy. This will allow two things: a general comparison across systems and a heuristic

¹⁰ O'Leary 1991, p. 159.

weighing of elements within a system. If the constitutional, party-internal and cabinet system determinants can be found on approximately the same level of autonomy, this implies the existence of a *coherent leadership profile*. The summarisation in table 14 was lengthy and complex. To clarify the case of profile coherence, a different *horizontal* perspective on the same dimensions is presented below in figure 13. This is the premiers' autonomy on the different dimensions, based on table 14. As there has been variation in the institutional setting, there are two feasible institutional scenarios of which the second is a minimal or 'worst-case' scenario (figure 14).

Figure 13. THE PRIME MINISTERIAL LEADERSHIP PROFILE

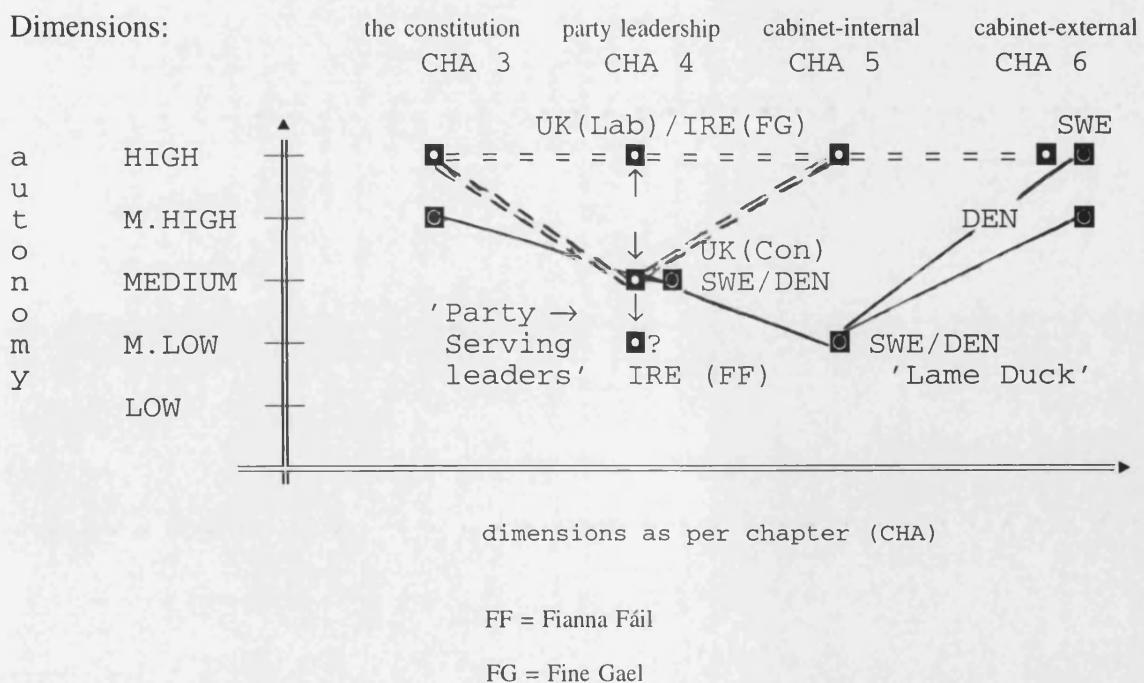
Coherent and non-coherent leadership profiles based on table 14.



In this figure there is a profile coherence for the Westminster block since the premiership throughout is provided with the same level of autonomy: i.e. there are no institutional 'Achilles' heels'. This profile coherence is of the utmost importance if the premiership is to evolve beyond the status of a *primus inter pares*. The British and Irish premierships have for long periods enjoyed the benefit of a position close to the profile in figure 13 above: a secure and even position on all main dimensions: constitutionally, party-politically and, to some extent consequentially, within the cabinet system. A coherent leadership profile also implies there are fewer possibilities for explicit disjunctions between national electoral processes and party-internal processes.¹¹ These main dimensions are not isolated parts of political life. In practice they enhance each other. The figure above corresponds to the feasible maximum setting, a kind of 'best possible'-scenario. Therefore we need another summary figure which illustrates the minimum institutional capabilities as summarised by this study.

Figure 14. THE PRIME MINISTERIAL LEADERSHIP PROFILE (MINIMUM)

Based on figure 13.



¹¹ E.g. King has discussed the pre-1993 disjunction between the possible deselection of the British premier by only one group of the British Labour party. Idem 1991, pp. 27-28.

Here there are apparent differences between the two blocks of systems. Now one can see that the institutional leadership profile basically is the same for the British and Irish premiers regardless of whether one tries to 'maximise' or 'minimise' the institutional profile (see also figure 15), the variance depends on which party holds the premiership. The uncodified case of Fianna Fáil is a potential cause of considerable volatility on the second dimension (CHA 4). This does by no means change the conclusion: party leadership is a decisive and crucial element of the premiership, especially in Westminster systems.

The similarity between the 'maximum' and 'minimum' leadership profiles with high autonomy levels throughout in figures 13-14 is one of the clearest possible indicators of a strong leadership position. This is an institutional explanation of the elusive 'prime ministerial power' which has been approached from a multitude of angles in political science.¹² Changes in the constitution or in the party rules could change the *leadership profile*. Nevertheless, it is remarkable how constant the profiles have proved to be since 1945.¹³ The conclusions from chapter four can be repeated: the potential volatility, or non-coherence, that the party leadership dimension depicts has remained little more than a *potential*. Even the most volatile of the four core dimensions has not been very volatile *de facto*. In perspective this contributes to explain why the prime ministership was seen as moving in a presidential direction in the 1980s. *Ergo*, the more the party leadership elections have moved away from undefined and elitist elections within, for instance, the parliamentary party, the less vulnerable the prime ministership has become.

Sweden and Denmark show more non-coherent leadership profiles. The premiers in Sweden and Denmark have not enjoyed the same extent of profile coherence as their colleagues in the two Westminster systems. Furthermore, parliament constellations have been reflected in both the Swedish and the Danish premiers' positions, in particular concerning the cabinet system dimension, reflected in the use of instruments like the recombination of the cabinet (i.e. reshuffling). As for the Swedish post-1945 prime ministership, there has been an evident discrepancy between the strong

¹² For an overview of different approaches, see, e.g., Blondel 1987.

¹³ Compare King 1993, p. 63: "[the degree of influence] would have looked very similar in the 1950s or the 1960s to the way it looks today; and the gap [between the categories] would have been very nearly as great then as it is now."

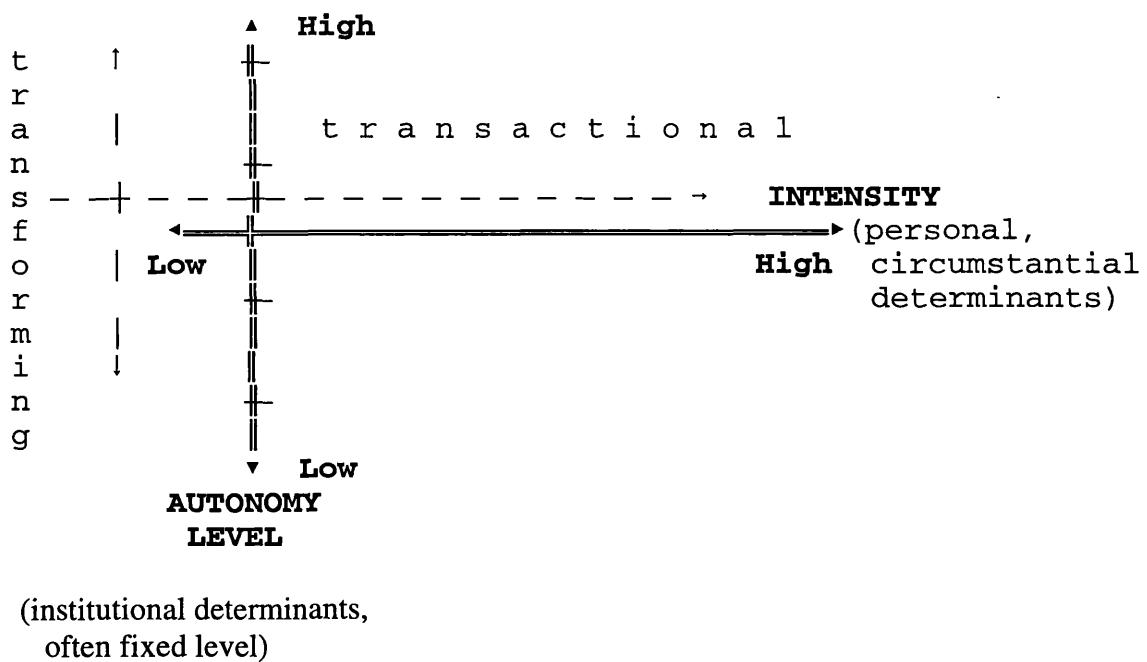
party-internal position, manifested in long-time leadership (see appendix one and two), and the less eminent position constitutionally as well as within the cabinet system. For a long time in the post-war period the Swedish premier had to act through the prerogatives of the Monarch (at times advantageous) and practically had his hands tied when it came to dissolutions of parliament and general elections (a three-year parliamentary mandate before 1.1.1995). Hence there has been only one extracurricular dissolution of the Swedish parliament, in 1958. Generally this difference between coherent leadership profiles in the Westminster-systems and non-coherence in Scandinavia should be seen in the light of leadership traditions. Westminster premiers are *chiefs* able to exercise considerable influence over policy-making in a number of ways whereas the Scandinavian colleagues are *chairmen*, who are supposed to rise above their cabinet peers only under extraordinary circumstances.

7.4 Integrating Other Central Concepts

7.4.1 On Autonomy and Intensity

A core question is about how well the premier can utilise the available means of influence, i.e. how well the actor is able to utilise the features of the arena rather than change it. The overall role attributed to a premier (active-reactive) is dependent on the level of *intensity* of the performance in each anchored institutional position. This intensity is to a great extent determined by personal characteristics: e.g. personality and motivation. Burns' concept of *transforming leadership* captures the essence of a leadership which not only represents a high level of intensity but also is able to change the overall level of institutional autonomy. This change need not only be a change from a lower to a higher autonomy level but can also be a conscious choice to downplay the role in a certain field. In the late 1980s the Finnish president Mauno Koivisto made a conscious choice to move the dualistic political system from being president-centred towards normal parliamentarism by not only being less active (the intensity dimension) but also by pressing for institutional changes on the autonomy level (lower engagement through constitutional means). The following figure explicates the difference between the level of autonomy (provided by the institutional capabilities) and intensity.

Figure 15. TWO DETERMINANTS OF THE LEADERSHIP PROFILE



The two dimensions above explain much about how the office is perceived. The *minimum* requirements of a premier are, to a great extent, the same regardless of whether he/she is the incumbent of a 'strong' prime ministership with wide capabilities (for example Britain) or only is the incumbent of a 'weak' premiership which is little more than a chairmanship (Denmark). The differences between the offices enter the picture when it comes to the *maximum* limit of autonomy the institutional setting allows. Therefore the visible difference between leadership extremes, entirely passive to hyperactive leadership, is larger in a system with a higher overall autonomy-level. Partially this is an explanation for the major swings in how the British media has perceived the premiership ('too powerful' or 'too weak'). In a system which provides less institutional space for action, the differences between leadership style extremes are bound to be seen as less distinct. A minimalist leader with the institutional *potential* of presidential leadership is indeed prone to look much 'weaker' than a premier in another system with less potential.

Figure 15 also provides further discourse on the notion of *style*.¹⁴ The prime ministers' competence seems to have been on a relatively constant level in the Westminster block, which means that personal and circumstantial variables create only a certain limited variation along the horizontal line of the *intensity-dimension*. In general debates these two concepts of autonomy level and intensity often have been intertwined, or even unseparated, which means that a change in *style* - along the horizontal line - has been perceived as a vertical institutional change, i.e. a real change in the prerequisites for 'prime ministerial power'. They are two separate dimensions. However, over a longer period of time the division between these two dimensions in figure 15 need not be clear as black and white. Often the determinant that separates the horizontal and vertical dimensions is simply *time*. A certain prime ministerial style can prevail through leadership over a long time and thus slowly evolve into political custom, which easily translates into a certain tangible level of institutionalisation. The end of the road is reached when this custom is embedded in a code, in legislation or even in the constitution.

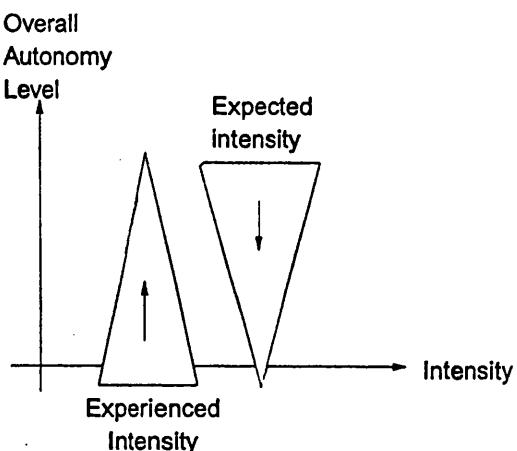
The style and leadership prerequisites may vary within the scope of one individual's leadership. Such variations occur, but are almost exclusively variations along the horizontal intensity-dimension. Inter- or intra-party-political changes are a foremost cause for changes along the intensity dimension, as is evident from the coalition-prone Danish system.

Figure 15 depicts two dimensions, 'overall autonomy' and 'intensity'. The relationship between the institutional capabilities and the intensity with which the leadership is pursued is useful for explaining a prime minister's *style*. The overall institutional autonomy contributes to determine the intensity, or at least the way the prime minister's intensity is perceived. The fewer capabilities the premier has, the more they have to focus on a narrow specialised sector. Based on figure one (chapter two) this can be a premier who has a low, 'specialist' competence but a considerable independence from other actors when using this specialised competence. Thus a low overall level of capability is compatible with an intense leadership. The Italian premier Lamberto Dini's pursuit of economic affairs is an example outside the scope of this study [1996]. The more institutional capabilities the premier possesses, the more the scarce resource of intensity has to be spread over

¹⁴ See also Jones 1989.

a range of responsibilities¹⁵. The same input of 'intensity' would be much more visible for a premier with few institutional capabilities.

Figure 16. TWO PERSPECTIVES ON INTENSITY



There is scope for considerable intensity at the top of the scale of capabilities, but it is rarely experienced, at least as a consistent pattern. Hence the British media reacted to the unusual intensity with which Thatcher pursued her policies - and the very wide range of policies over which it was done. The intensity space can be stretched by the reasoning that the institutional sum is larger than the sum of the constituent institutional subdimensions - there is an 'overspill effect'. A premier with extensive institutional capabilities is likely to enjoy an additional intangible benefit from being autonomous on the key institutional dimensions, whereas a generally 'weak' premier is likely to experience an equally intangible disadvantage from being institutionally constrained.¹⁶

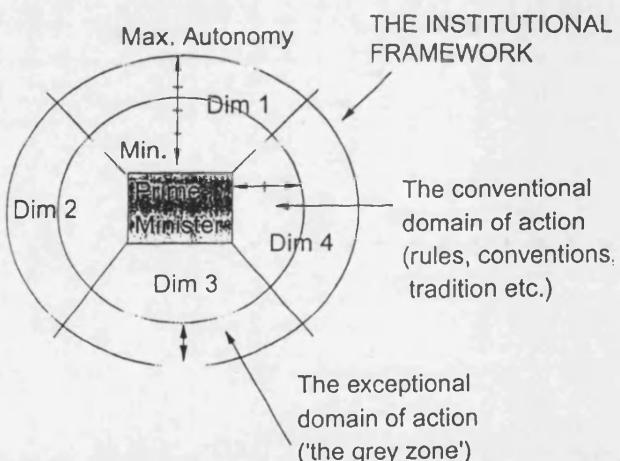
¹⁵ Compare the need for presidential 'policy-focus' in the United States (e.g. foreign- or domestic focus).

¹⁶ The reasoning here is close to the concept of 'direction' which was introduced in chapter two.

7.4.2 Use or Abuse of Power? On Power-Wielding in the 'Grey Zone'

The premier's scope of action evidently varies between the systems. However, one of the foremost reasons for engaging in an exercise to define the premier's institutional framework is to be able to see to what extent the potential scope of action is utilised. There is a very general pattern: only exceptionally does a prime minister utilise his institutional capabilities to an *absolute* maximum. Under normal circumstances most institutional capabilities are utilised with moderation, which is exemplified in figure 17 below. This extent is determined by rules and conventions at work under normal circumstances. Under exceptional circumstances, however, there might be a need to utilise the capabilities to a maximal extent. Such extraordinary utilisation of the capabilities, e.g. in the form of parliamentary dissolution or hiring/firing ministers in a non-Westminster-system, is often perceived as dubious since there is little experience of utilising these instruments.

Figure 17. INSTITUTIONAL AUTONOMY: THE NORMAL AND THE 'GREY' ZONE



The outer borderline depicts fairly fixed institutional confines: even though a part of the outer institutional framework would change, this alteration does not constitute a significant change for the institutional framework as a whole. Inside these confines there is an 'grey zone' in the institutional capabilities of the premierships. The constitutional capabilities are normally used to a moderate equilibrial extent so as not to cause disturbance to the delicate balance of power with other key actors (parliament, key ministers, the president). The constitutional capabilities exemplify a grey zone problem (which is a *raison d'être* for constitutional expertise). This 'grey zone' constitutes an *opportunity* for the premier but as much as it is an opportunity it is also a *risk* for the premier since it entails an unusual extent of power-wielding with, potentially, equally unusual

consequences. This is the essence of the 'constitutional instruments' paradox' accounted for at the end of chapter three. The more the premier is in need of fully utilising his/her constitutional capabilities, the more difficult it is - because of the particular circumstances that produced the need to utilise the capabilities.

The Elastic Band Analogy

Jones compared the British premiership to an elastic band, which forms to encompass what is needed by the incumbent.¹⁷ This metaphor of flexibility is intriguing in the light of the 'grey zone'-argument. There is good reason to describe the British premiership with this metaphor; however, the 'grey zone'-argument helps specify its meaning. This 'elasticity' of the premiership is concerned with the elusive border between conventional and extraordinary utilisation of the premier's capabilities, *not* with the existing overall capabilities (i.e. the outer borderline of the institutional framework). This logic is compatible with Jones's notion of a persistent structure of central government. In 1989 Jones commented on Thatcher's leadership by stating that

"She brings a distinctive style to government, but she has not changed the structure of central government."¹⁸

How does the metaphor fare when one looks at other offices of prime minister? Indeed this elasticity seems typical of the British office. The interplay between conventions and flexibility make the British premiership something of a *sui generis*. The institutional framework matters as much in Britain as elsewhere, but because of the core importance of the office and the common law tradition, a British premier is able to influence the institutional capabilities to an unusual degree. Including the 'party leadership contract' in the elastic band analogy adds to an explanation of the elasticity in the British case (compare figure 16). One can utilise the elastic band analogy, but the *elasticity* of the band varies considerably from system to system.

¹⁷ Jones 1987 and 1990a.

¹⁸ Idem 1989, p. 250 (underlining by Fredrik Holm).

Also the width of the grey zone is likely to vary from system to system. Britain is the archetype of a political system with a large overall domain of prime ministerial action and a large grey area, enhanced by bi-polar politics and a flexible constitution. The grey area of executive politics can also help understand the multitude of academic approaches coined in Britain, for instance the core executive-approach. The figure above can also exemplify another popular misconception about the 'powers of the prime minister'. There is seldom a conceivable change in the institutional framework (compare Jones above); instead a perceived increase in the prime minister's 'power' might imply a consistently higher level of utilisation of capabilities *within* the institutional framework, i.e. the 'grey zone' becomes thinner. The prime minister's powers should hence be comprehended both on absolute and relative terms. Thatcher's use of the available instruments, such as her press secretary, exemplify increasingly used capabilities in relative rather than absolute terms. In the uncodified British constitutional context power-wielding in the outer grey zone has been a particular bone of contention and a cause for debate about the powers of the office. Michael Heseltine's resignation from Thatcher's cabinet was precipitated by what he saw as dubious use of prime ministerial capabilities. Nigel Lawson referred to abuse of the prime ministerial power when he departed from the Thatcher government. Similarly, usage of paragraph 13:2.2 of the Irish Constitution is relevant under circumstances that border on abuse of prime ministerial powers, i.e. an attempt by the premier to dissolve parliament after having lost its confidence. In the name of national or party consensus some indistinct decisions have been taken in Sweden e.g. the reappearance of the Carlsson cabinet two weeks after its resignation (Carlsson I). These occasions constitute examples of power-wielding on the border between legitimate and illegitimate use of prime ministerial capabilities.

However, what is considered a grey zone of power-wielding is dependent on the premiership's level of autonomy on other dimensions (see figures 14-16). The different institutional capabilities are interdependent insofar as maximal use of capabilities on one dimension without a favourable position on the other dimensions is so far from an equilibrium that it is unlikely to be sustainable for more than a short period or occur more than incidentally (an exception could be extensive use of the party leadership - 'a party directing leader', see chapter two). For an absolute change of the prime minister's 'power' to occur, the premier should have fully utilised the capabilities, throughout the different dimensions of the leadership profile, before any such absolute change is likely. The relative resources have to be exhausted before a change on absolute terms is likely. However, if

there no longer exists a grey zone, the pressures to increase the premier's capabilities become considerable.

7.4.3 The Prime Minister's Roles

As with *style*, the frequent notion of prime ministerial *roles* is difficult to avoid. The more one deals with the prime ministership, the more it seems the prime minister is like a chameleon who has to be able to play a multitude of roles, at times simultaneously. In this study three main roles were defined in the chapter on method. These evolved into four main chapters of the thesis. A number of scholars have dealt with executive political power from role perspectives. James described the three core roles the British premier has on the political arena: the coordinator, the mediator and the protagonist.¹⁹ Ruin's study of Erlander's long-time premiership in Sweden described six basic roles: the cabinet *formateur*, the cabinet leader, the party leader, the ideologist, the national conciliator and the decision-maker.²⁰ Weller had a different emphasis, he pointed out there are roles the prime ministers *must*, *should* and *can choose* to play:

*"They must chair cabinet, prevent fragmentation, arbitrate; fight fires; meet media and international demands. They should be guardian of the strategy; focus priorities. They choose to run individual policy areas; keep control of/an eye on individual policies. Each category concerns political, policy and administrative problems."*²¹

Roles, like institutions, can be of a formal or informal character. The role perspective is, however, broader than the institutional perspective. The prime minister must personify certain institutionally defined roles. These constitute the *minimum* requirements of the office (see chapter three). Murto referred to these minimum requirements of the office as 'the basic roles'.²² Beyond these basic roles

¹⁹ James 1992, p. 113.

²⁰ Ruin 1986, p. 7.

²¹ Weller 1985, p. 207.

²² Murto 1994, p. 16 (translation from Finnish by Fredrik Holm).

there are abstract roles like the ideologist. Third there are the behavioural role elements. A number of personal roles are reflected in the premiership (past, present, even ambitions), which are similar to Weller's third category - the roles the premier chooses to take on. Together the basic, the abstract and the personal roles constitute a role aggregate, which reflects the *role expectations* (Blondel's division into position and role behaviour;²³ see also the section 'the institutional and the behavioural' below). This aggregate role of the premier is a merger of the personal and institutional elements, of the prime minister and the prime ministership. Together with a third pillar, circumstantial factors, they determine how the political capabilities can be used.

The roles premiers/choose to adopt, that is the areas they choose to intervene or *not* to intervene in, somehow always seem to raise questions in public debates about the 'prime minister's powers'. Depending on the institutional leadership profile, the incumbent will have different opportunities to exercise influence within different fields (see figure 12). Should the constitutional point of departure not be favourable, it is likely the primary focus of the incumbency will be diverted to other dimensions, for instance to the party leadership (in the form of a 'party-directing leader') or to the cabinet-external dimension, particularly international engagement, which was shown to pose few institutional constraints on the prime ministership and often acts as a domestic 'influence-amplifier'. Thus the institutional setting is significant for shaping the prime-ministerial roles and policy outcomes. The concept of roles is indeed broader than the institutional framework, but also more nebulous and, hence, problematic for political science. The role perspective can be normative but is most often used *a posteriori* to deliver a verdict on an incumbency.

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²³ Blondel 1980, p. 12.

7.5 The Prime Minister's International Role

The changes in the Western European premiers' international role deserve special attention. In the seminal study *Presidents and Prime Ministers* (1980) Rose argued the following about the British premiership:

"What power does the Prime Minister exert through involvement in foreign affairs? The answer is: Not much."²⁴

The premiership is engaged in a two-way interaction with international politics. International and supranational politics not only transforms but forms the role of national high politics. The foremost example of a profound transformation since Rose's book was published in 1980 is within the European Union. When it comes to national elite actors, particularly the *troika* of the prime minister, the minister of foreign affairs and the minister of finance, the internationalisation and interdependence of politics have been a distinct source of increased influence. The traditional decision-making mechanisms in nation-states may have declined in relative importance in recent years, but for the key national actors the sphere of influence has broadened considerably. This power redistribution has been seen as a zero-sum game where national parliaments have been the net losers of influence in policy spheres where particularly the EU has gained in influence. This decision-making shift has not only been horizontal, it has also been a vertical shift upwards, towards the cabinet-level actors. The focus of the EU's decision-making mechanisms is distinctly on the national executives. For the prime minister and cabinet there has been an increase in influence on an international level without losing much of the traditional role of the national executive. Some of the European Union's institutional arrangements explicitly require a solid national executive, most notably the rotating Council presidency. The rationale for the cabinet's increased influence is as simple as it is practical and important: the bargaining power of a nation-state may be weakened if its principal bargainer in international politics, the prime minister or minister of foreign affairs, cannot engage in the real bargaining.²⁵

²⁴ Rose 1980, p. 38.

²⁵ See King 1993.

A key example is the way the status of the European Council has increased. After its initial commencement in 1969 it reached institutionalised forms in 1974. Until the Treaty on European Union, the status of this summity remained only quasi-legal.²⁶ Now the European Council is acknowledged as a key decision-reaching institution (as opposed to formal decision-making in the Council of Ministers) in the European Union. In a seminal article Moravcsik concluded that major intergovernmental outcomes, such as the Single European Act, are explained by the key premiers' domestic constraints and freedoms.²⁷ The European Council has been instrumental in increasing the role of taking decisions and outlining policies for the whole of Western Europe. At the same time national parliaments have been net losers of influence - a loss of influence which the European Parliament has been unable to compensate for. The increasing use of majority voting in the Council of Ministers, which marginalises separate national voices, contributes to make the premiers' voices in the European Council summits more influential. Furthermore, despite its institutionalisation the EC has enjoyed a highly autonomous and flexible status. It has not been controlled by the European Court of Justice, and the number of meetings may vary, with a prescribed minimum of two summits a year.²⁸ Thus the EU premiers²⁹ in an *intergovernmental* summit reach central decisions that are of a *supranational* character.

The premiers' increased influence within the EU stretches beyond the European Council. Premiers have been able to be the spiders in the web of EU decision-making: ministers, dependent on their cabinets (if not premiers), reach the decisions in the Council of Ministers. Premiers also play a crucial role in EU's intergovernmental conferences, which are hierarchically above the European Council. Bilateral summity is equally on the increase, often as a preparation for decisions to be reached at European Councils. The linkage between national and intergovernmental politics has meant more influence without more accountability for national key actors. The study identified one notable exception to this rule: the Danish parliamentary committee for European Affairs which

²⁶ The Maastricht Treaty mentions the European Council on at least three occasions, see Nugent 1994.

²⁷ Moravcsik 1991.

²⁸ E.g. the additional Dublin Summit 1990 on German unification.

²⁹ And/or the heads of state in the cases of France and Finland.

controls the cabinet's stance and decisions on the international stage. In Denmark the premier is cross-examined before and after crucial summits like European Councils in the same way as the rest of the cabinet before Council of Ministers meetings. This committee has provided an unusually concrete link between parliament and EU affairs and kept the prime minister as no more than a first among equals in international affairs.

There are many post-1945 institutions outside the scope of the EU that provide increasing opportunities for the premiers: OECD, WEU, the Nordic Council, G7, OSCE, Council of Europe to mention only some. Increased international decision-making power is not the only consequence for the prime ministership. Earlier prime ministers in different European systems barely knew each other; now the EU institutions are a cause of convergence between the premierships. Most notably administrative convergence is required in the *troika* arrangement for the rotating EU Council presidency.³⁰ This convergence has been depicted in several recent works on national premiers.³¹ The way in which the European Union has developed could transform the argument about political gains from the interplay between national and international politics (see chapter six). Intergovernmental bargaining used to be concerned with high politics issues. Today many of the issues that used to be subject to international bargaining are decided upon supranationally. The cabinet can utilise only some spheres of international politics to amplify its influence domestically (e.g. security and defence). Increasingly policy spheres are moved from the intergovernmental pillars of EU decision-making to the supranational first pillar. Other issues are dealt with at frequent bi- or multilateral summits. Political science has yet to explore exactly how this summity has influenced, and perhaps changed, the national premierships. It certainly accounts for a very considerable proportion of the premier's working hours.³² It is high time to refute Rose's statement which introduced this chapter section.

³⁰ For details on this *troika* arrangement, see, e.g., Kirchner 1992 and Nugent 1994.

³¹ See, e.g., King 1993.

³² See Lee 1995; for a concrete example of a premier's weekly schedule, see Murto 1994.

7.6 The Office of Prime Minister Compared: Some Concluding Remarks

This project's comparative strategy has clarified what the prime ministers' constraints and freedoms are and can be, and has thus helped to redress the imbalance in Anthony King's opening citation in chapter one. It has to be stressed there are a number of explanatory factors for the prime ministerships roles that would seem trivial from a single-country perspective. The division of the analyzed entities into two blocks turned out to be adequate: in spite of differences it depicts two different block-specific prime ministerial paths. A thorough analysis should provide both macro- and micro-perspectives. The block-internal comparisons provided a detailed analysis of the different sub-dimensions and the comparison between the two blocks contributed to a perspective which provides opportunities for generalisation. A comparison of only Sweden and Denmark would have resulted in differences being accounted for only in details, as in the premier's abilities to dissolve parliament. There is some more systemic variation between a British prime minister and an Irish *Taoiseach*, but, again, a contrasting Nordic perspective turned out useful. Without the Nordic block the party leadership aspects would have looked considerably more centred around yearly challenge opportunities and the leadership of the parliamentary party.

The party leadership dimension is of pivotal importance. The study agrees with Jones in stating that the relationship between prime ministers and parties is the most important of all linkages for most prime ministers.³³ The party leadership contract contains a potential for considerable variation. When one examines the parties' institutional arrangements, there are virtually no checks on the party leaders outside the scope of the formal opportunities to change the leader. The party leaders in all eight examined parties indeed enjoy generous party leadership contracts. Yet the party leadership is of all dimensions the one with the clearest potential for suddenly undoing the prime ministership. This study shows that, however important as a potential reason for losing the premiership, it is *little but a potential reason*. Equally many of the constitutional imbroglios discussed in chapter three have remained theoretical. The premiers' 'power' is more likely to correspond to figure 13 than figure 14 as many prime ministerial *capabilities* have been utilised whereas many *constraints* have remained unapplied.

³³ Jones 1991, pp. 175-176.

The combination of party leadership and prime ministership proved forceful in the UK, the Irish Republic, Sweden and Denmark alike. Virtually no prime ministers have clearly been unseated through the party while in office as prime minister, Mrs Thatcher being the notable exception. Party rules make a difference because they provide different opportunities for leadership reviews, both in frequency (scarce opportunities in the Nordic countries) and procedure (distinct challenge thresholds in Britain). Often variations in these elements have an indirect impact: e.g. they create different levels of insecurity about leadership challenges. An indirect conclusion is that a prime minister who is *not* a party leader, as at times in the Netherlands or Finland, is likely to enjoy a stable and autonomous position, unless it is extraordinary circumstances that bring a non-party leader to the premiership.

Some basic distinctions need to be stressed. First, the political institutions that *en masse* constitute the institutional framework of the premiership can be divided into two basic categories: i) institutions that set the rules of the game - like the constitution and the party rules - and ii) institutions that, as for the premierships, increase or decrease their influence potential. For prime ministers the cabinet committee structure and international engagement are two typical examples of the latter category. The impact of rules can be both *active* and *passive*. The rules can be actively used to determine the outcome of a party leadership contest, or passively be the reason why no leadership challenge was mounted (e.g. too high a threshold, as with the British Conservative's rule that requires a backing by 10 per cent of the MPs for a challenge). Another crucial distinction is between *day-to-day politics* and *specific conjunctures*. The components of the institutional setting matter, but different components matter in different ways - and at different times. In the daily management of the cabinet there are certain, although few, restraints on the premiers. More importantly there are a number of critical conjunctures at which the institutional setting provides the action options. They include a vote of investiture in parliament (requiring a negative or positive majority), resignation procedures and the party leadership elections, at whatever interval they occur (the passing of the budget is not dealt with in this study as it largely is dependent on circumstantial factors).

7.6.1 No General Modus Operandi

The introduction to this chapter posed the question of a prime ministerial job description, or *modus operandi*. Because of differences on both the horizontal and vertical institutional dimensions, it is difficult to discern a general prime ministerial *modus operandi*. Indeed one could claim that a prime ministerial job description can be only systemic, with the exception of the institutionalised ways in which premiers interact intergovernmentally.³⁴ The different dimensions of institutional impact, the personal roles and circumstantial factors all contribute to make a general description of the prime ministership rather useless. Starting with the party-internal basis there are considerable differences in the prerequisites for national leadership. Even the roles that prime ministers *must* personify as a lowest common denominator vary significantly between the systems, as do the further dimensions of strings the premiers choose to play. There are similarities between the prime ministerships, especially on a macro-level of analysis, but there are a number of differences on a micro- and meso-level. Essentially the institutional settings accommodate two different kinds of premierships: the *chief* in Westminster systems and the *chairman* in the Nordic tradition, to use Farrell's classic terms.³⁵ This important distinction is not evident in the constitutions; it is most clearly reflected in the cabinet-internal dimension. The role of the prime minister in semi-presidential systems also contributes to relativise a potential *modus operandi* for the office. In prime ministerial systems the prime ministership is the concrete apex of a political system's power relationships. As such the prime ministerships will always remain systemic.

7.6.2 The Behavioural and the Institutional: Leaders and Leadership

Eventually, what can be said about one of the sources of inspiration for this study, Rose's controversial statement in *West European Politics*³⁶ that 'institutions create more variation in the office of prime minister than do personalities'? Based on this study, it seems pointless to

³⁴ See also the earlier section 7.4 on prime ministerial roles.

³⁵ Farrell 1971.

³⁶ Rose 1991, p. 9.

evaluate the impact of the two elements *against* each other. One needs to know the one element to assess the impact of the other. Personalities have influenced the institutional framework to an unimportant extent: the traditions of the office seems paramount. No one can tell whether a political actor has been acting within the confines of the institutional framework *before first defining it*. The institutional framework provides the different premiers with very different action options in similar circumstances. Hence the institutional setting introduces elements of predictability. Another reason for advocating the role of the institutional framework is that there were few clear-cut examples of political actors acting beyond the institutionally defined limits. The exceptions tended to describe extraordinary circumstances, like the changes in the Swedish government after the assassination of Olof Palme in 1986. The resignation and subsequent re-emergence of Carlsson's first Swedish government in 1990 is one of the other few cases with sparse institutional guidelines. Even here an institutional analysis can be made based on the different dimensions in this study. The constitution did not provide any guidelines (it passed the ball to the Speaker, see chapter three); within the party Carlsson's position was steadfast, and within the cabinet system there were no institutional causes or conjunctures that proved crucial at the time. It thus became possible for the government to return to office with a different bill.³⁷ The importance of outlining the institutional leadership profile lies in the fact that the overall position of prime minister Carlsson was reasonably autonomous. The strengths of the leadership profile could fill up the 'constitutional gap' to the premier's and cabinet's advantage.

Behavioural and institutional elements should not be seen as contrasting elements but rather as complementing each other. This requires rephrasing of some common arguments. Theoretically structural aspects can be of second-rank importance. An individual can always act beyond the given set of rules as long as no coercive restraints are involved. Or, as another argument goes, one is unlikely to detect a deviation from the institutional rules because of their being highly general. This argument should be refuted. We now know there is little deviation from the described institutional rules. At times institutional rules present the premier with few and narrow action options (e.g. within the Nordic decision-making in cabinet), and at times the rules provide only general guidelines for action (e.g. British constitutional rules). Furthermore the institutional

³⁷ The minority government had formally to step down as the Communist Left Party and the Green Ecology Party withdrew their support. See Keesing's, 1990, pp. 37261-37262.

framework around the premier generally directs *opportunities* rather than *constraints*. Rather than looking at deviations between the rules and the players, one should emphasise the different opportunities the rules allow, given other conditions facilitate these opportunities.

In practice institutions and behaviour seem to correspond. Theoretically there could exist a British premier who, because of personal traits, is unable to utilise the prominent opportunities the office offers. The point this study makes is that this eventuality is implausible since such a personality is unlikely to pass through all the politico-institutional sieves the different dimensions entail: the constitutional point of departure, the party leadership and the 'cabinet skills' require considerable capabilities, even at minimum. A prime ministership which has a coherent high-autonomy profile is likely to obtain an incumbent to match the institutional profile. If there is a non-coherent leadership profile it might prove easier to reach the leadership: an example is the short premiership of Mr Ullsten in Sweden 1978-1979 (for details, see chapter three). Often an evaluation of the suitability for the premiership is embedded in the process of selection of the party leader. Leaders are obliged to behave in ways which are rational for the institutional framework,³⁸ or, as Elgie pointed out, there are at least incentives for leaders to behave appropriately (e.g. cooperation from other members of the group) as well as sanctions for failing to do so (rejection through not being seen as fitting in).³⁹ The match between the incumbent and the institution is likely to become better the closer one comes to the political top - because there is an increasing number of influencing institutional factors (which translate into 'institutional sieves'). For some these arrangements constitute obstacles, for others opportunities.

There are dimensions left outside the scope of this study. Concerning intergovernmental bargaining Moravcsik emphasised the explanatory value of the premier's institutional freedoms and constraints. A central bargaining determinant is the party-political setting in the cabinet and national parliament, e.g. the size of the government's parliamentary backing. However, this study wants to make the point that a premier who enjoys extensive autonomy and, ideally, a coherent institutional profile will be able to meet domestic difficulties and opposition in a way which is different from that of a leader with obvious institutional weaknesses. The reasoning is the same

³⁸ See also March & Olsen 1984, p. 741.

³⁹ Elgie 1995, p. 205.

within a cabinet [for the prime ministership] as within a party [for the party leadership]: *hard decisions are easier to take when consequences do not impinge directly on the leader's position*. A premier who can be replaced easily as party leader is not likely to reach the same kinds of decisions in intergovernmental bargaining as a leader who can disregard accountability to the party or parliament for a year or longer (see chapter four). The party leadership contract is a foremost determinant for the extent to which policy compromises have to be reached when there is a conflict between the will of the electorate and the will of the cabinet (e.g. European affairs in Denmark 1992-1993). If the premier enjoys extensive autonomy as a party leader the need for compromises decreases. Similarly the cabinet-internal dimension is significant; it is difficult, although not inconceivable, to see a consensual *primus inter pares* reach controversial decisions in cabinet.

7.6.3 'Primus Inter Pares'- A Misused Concept?

The papal description *primus inter pares* has been widely attributed to the prime ministership, especially in Westminster-systems.⁴⁰ The expression is illustrative, but not so in this most widely used Westminster context. The prime ministerships are still essentially fulfilling different executive purposes in different Western European political systems. There was a clear difference between the two blocks of systems examined in this study. As has been concluded, a most important dividing line between the premierships in Europe lies between leadership traditions of having a *chief* and of having a *chairman*. The phrase *primus inter pares* has been attributed to precisely the tradition of leadership which it does not really bear resemblance to. Instead this term should be used to describe chairman premierships, such as Sweden and Denmark.

Westminster premiers are institutionally put in a position where they are expected to be more than a first among equals. Furthermore, the position of the Danish premier is particularly well captured by the paradox inherent in the notion 'first among equals'. Westminster-system premiers are more accurately described with Sartori's chief executive, also by himself referred to as a

⁴⁰ See e.g. Weller 1985.

'first above unequals'.⁴¹ This chapter's introductory citation by King about the differences between the premierships points to another notable myth. Often the premiership is seen as something similar throughout different political systems; this is not yet the case, despite increasing reasons for convergence. There are indeed some 'powers' that in comparison could give other premiers 'a considerable shock'.⁴² For a Westminster-system prime minister it must be difficult to grasp that a Scandinavian premier might be in a position where he/she does not have to worry about any leadership challenges for four consecutive years, or to vote personally in parliament. A Danish prime minister would similarly be surprised to see how powerful the Irish *Taoiseach* is within the cabinet.⁴³ However, the worn phrase *primus inter pares* also hints at a characteristic all four premierships share. They are all *primus solus*,⁴⁴ they all stand alone on the lonely pulpits of party and cabinet leadership. They all have rights and responsibilities vested *solely* in them by constitution, law and convention and they all have to make irrefutable national decisions on their own, from the stage of cabinet formation through to decisions on resignation.

Image and office are not the same; neither are leaders and leadership. This study has shown that powers need not *per se* be a guarantee for power. Indeed powers are a necessary but not sufficient part of active leadership in a liberal democracy. However, powers often contradict each other. Powers have to be balanced; they have to be distributed evenly throughout the elements that collectively constitute the *institutional leadership profile* to create prerequisites for anything but a transactional leadership. One veto-dimension, like the party leadership, can potentially undo the whole leadership. It would therefore be interesting to expand the scope of this analysis to encompass more political systems within the same framework to see exactly what other political systems, like a semi-presidential block, would add to the comparative picture of the premiership.

⁴¹ Sartori 1994, pp. 102-103.

⁴² King 1993.

⁴³ See chapter five.

⁴⁴ Rose 1980.

The prime minister and the prime ministership are two concepts that far too often have been entwined to a degree of inseparability which only has resulted in a general imperceptibility and, often enhanced by mass media, in very different images of 'power'. Sometimes the leader has constituted the dominant element, sometimes the leadership in itself has seemed to be the more visible part. A separation of the two elements serves all purposes by introducing greater clarity, understanding and predictability.

"But constant experience shows us that every man invested with power is apt to abuse it, and to carry his authority until he is confronted with limits. Is it not strange that we are obliged to say that virtue itself has need of limits?"

Montesquieu, *De l'Esprit des Lois*, book XI, p. 4

Appendix 1. POST-1945 PRIME MINISTERS (UK, IRELAND, SWEDEN, DENMARK)

| Name | Party affiliation | Time in office |
|------|-------------------|----------------|
|------|-------------------|----------------|

Great Britain

| | | |
|--------------------|--------|---------------------|
| 1. C. Attlee | (Lab) | Jul 1945 - Oct 1951 |
| 2. W. Churchill | (Con) | Oct 1951 - Apr 1955 |
| 3. A. Eden | (Con) | Apr 1955 - Jan 1957 |
| 4. H. Macmillan | (Con) | Jan 1957 - Oct 1963 |
| 5. A. Douglas-Home | (Con) | Oct 1963 - Oct 1964 |
| 6. H. Wilson | (Lab) | Oct 1964 - Jun 1970 |
| 7. E. Heath | (Con) | Jun 1970 - Mar 1974 |
| 8. H. Wilson | (Lab) | Mar 1974 - Apr 1976 |
| 9. J. Callaghan | (Lab) | Apr 1976 - May 1979 |
| 10. M. Thatcher | (Con) | May 1979 - Nov 1990 |
| 11. J. Major | (Con) | Nov 1990 - |

The Republic of Ireland

| | | |
|-------------------|------|---------------------|
| 1. E. de Valéra | (FF) | Mar 1932 - Feb 1948 |
| 2. J. Costello | (FG) | Feb 1948 - Jun 1951 |
| 3. E. de Valéra | (FF) | Jun 1951 - Jun 1954 |
| 4. J. Costello | (FG) | Jun 1954 - Mar 1957 |
| 5. E. de Valéra | (FF) | Mar 1957 - Jun 1959 |
| 6. S. Lemass | (FF) | Jun 1959 - Nov 1966 |
| 7. J. Lynch | (FF) | Nov 1966 - Mar 1973 |
| 8. L. Cosgrave | (FG) | Mar 1973 - Jul 1977 |
| 9. J. Lynch | (FF) | Jul 1977 - Dec 1979 |
| 10. C. Haughey | (FF) | Dec 1979 - Jun 1981 |
| 11. G. FitzGerald | (FG) | Jun 1981 - Mar 1982 |
| 12. C. Haughey | (FF) | Mar 1982 - Dec 1982 |
| 13. G. FitzGerald | (FG) | Dec 1982 - Mar 1987 |
| 14. C. Haughey | (FF) | Mar 1987 - Feb 1992 |
| 15. A. Reynolds | (FF) | Feb 1992 - Jan 1995 |
| 16. J. Bruton | (FG) | Jan 1995 - |

| Name | Party affiliation | Time in office |
|------|-------------------|----------------|
|------|-------------------|----------------|

Sweden

| | | |
|-----------------|-------|---------------------|
| 1. P.A. Hansson | (SAP) | Sep 1936 - Oct 1946 |
| 2. T. Erlander | (SAP) | Oct 1946 - Oct 1969 |
| 3. O. Palme | (SAP) | Oct 1969 - Oct 1976 |
| 4. T. Fälldin | (Cen) | Oct 1976 - Oct 1978 |
| 5. O. Ullsten | (Lib) | Oct 1978 - Oct 1979 |
| 6. T. Fälldin | (Cen) | Oct 1979 - Oct 1982 |
| 7. O. Palme | (SAP) | Oct 1982 - Mar 1986 |
| 8. I. Carlsson | (SAP) | Mar 1986 - Oct 1991 |
| 9. C. Bildt | (Mod) | Oct 1991 - Oct 1994 |
| 10. I. Carlsson | (SAP) | Oct 1994 - Mar 1996 |
| 11. G. Persson | (SAP) | Mar 1996 - |

Denmark

| | | |
|------------------------|--------|---------------------|
| 1. K. Kristensen | (Lib) | Nov 1945 - Nov 1947 |
| 2. H. Hedtoft | (Soc) | Nov 1947 - Oct 1950 |
| 3. E. Eriksen | (Lib) | Oct 1950 - Sep 1953 |
| 4. H. Hedtoft | (Soc) | Sep 1953 - Feb 1955 |
| 5. H. Hansen | (Soc) | Feb 1955 - Feb 1960 |
| 6. V. Kampmann | (Soc) | Feb 1960 - Sep 1962 |
| 7. J.O. Krag | (Soc) | Sep 1962 - Feb 1968 |
| 8. H. Baunsgaard | (Rad) | Feb 1968 - Oct 1971 |
| 9. J.O. Krag | (Soc) | Oct 1971 - Oct 1972 |
| 10. A. Jørgensen | (Soc) | Oct 1972 - Dec 1973 |
| 11. P. Hartling | (Lib) | Dec 1973 - Feb 1975 |
| 12. A. Jørgensen | (Soc) | Feb 1975 - Sep 1982 |
| 13. P. Schlüter | (Cons) | Sep 1982 - Jan 1993 |
| 14. P. Nyrup Rasmussen | (Soc) | Jan 1993 - |

Party abbreviations:

| | |
|---|---|
| Cen - The Swedish Center Party | Con - the British Conservative Party |
| Cons - the Danish Conservative Peoples' Party | |
| FF - Irish Fianna Fail | FG - Irish Fine Gael |
| Lab - the British Labour Party | Lib - the Danish Liberal Party (Venstre)/Swedish Liberal Peoples' Party |
| Mod - the Swedish Moderate Unity Party | SAP - the Swedish Social Democratic Labour Party |
| Soc - the Danish Social Democratic Party | Rad - the Danish Social Liberal Party (Radikale Venstre) |

The data above is based on da Graça 1985, Keesing's Contemporary Archives (various years) and European Journal of Political Research vol 24/nr 1 1993.

Appendix 2. POST-1945 PARTY LEADERS

(The leaders of the eight parties dealt with in chapter four)

Britain**1. The Conservative Party**

| | |
|--------------------|-------------|
| 1. W. Churchill | 1940 - 1955 |
| 2. A. Eden | 1955 - 1957 |
| 3. H. Macmillan | 1957 - 1963 |
| 4. A. Douglas-Home | 1963 - 1965 |
| 5. E. Heath | 1965 - 1975 |
| 6. M. Thatcher | 1975 - 1990 |
| 7. J. Major | 1990 - |

2. The Labour Party

| | |
|-----------------|-------------|
| 1. C. Attlee | 1935 - 1955 |
| 2. H. Gaitskell | 1955 - 1963 |
| 3. H. Wilson | 1963 - 1976 |
| 4. J. Callaghan | 1976 - 1980 |
| 5. M. Foot | 1980 - 1983 |
| 6. N. Kinnock | 1983 - 1992 |
| 7. J. Smith | 1992 - 1994 |
| 8. T. Blair | 1994 - |

The Republic of Ireland**1. Fianna Fáil**

| | |
|-----------------|-------------|
| 1. E. de Valera | 1926 - 1959 |
| 2. S. Lemass | 1959 - 1966 |
| 3. J. Lynch | 1966 - 1979 |
| 4. C. Haughey | 1979 - 1992 |
| 5. A. Reynolds | 1992 - 1994 |
| 6. B. Ahern | 1994 - |

Post-1945 Party Leaders - continued

2. Fine Gael

| | |
|------------------|--------------------------|
| 1. R. Mulcahy | 1944 - 1959 ¹ |
| 2. J. Dillon | 1959 - 1965 |
| 3. L. Cosgrave | 1965 - 1977 |
| 4. G. FitzGerald | 1977 - 1987 |
| 5. A. Dukes | 1987 - 1990 |
| 6. J. Bruton | 1990 - |

Sweden

1. The Social Democratic Labour Party (SAP)

| | |
|------------------|-------------|
| 1. P.-A. Hansson | 1925 - 1946 |
| 2. T. Erlander | 1946 - 1969 |
| 3. O. Palme | 1969 - 1986 |
| 4. I. Carlsson | 1986 - 1996 |
| 5. G. Persson | 1996 - |

2. The Moderate Unity Party (Moderata Samlingspartiet)

| | |
|------------------|-------------|
| 1. J. Hjalmarson | 1950 - 1965 |
| 2. G. Heckscher | 1961 - 1965 |
| 3. Y. Holmberg | 1965 - 1970 |
| 4. G. Bohman | 1970 - 1981 |
| 5. U. Adelsohn | 1981 - 1986 |
| 6. C. Bildt | 1986 - |

¹ Nota bene: During Mulcahy's period in office there was a division between the party leadership and the national premiership, thus J. Costello was appointed prime minister. General Mulcahy was only seen as suitable for the office of party leader, not for the office of prime minister because of his military career.

Post-1945 Party Leaders - continued

Denmark

1. The Social Democratic Party (Socialdemokraterne)

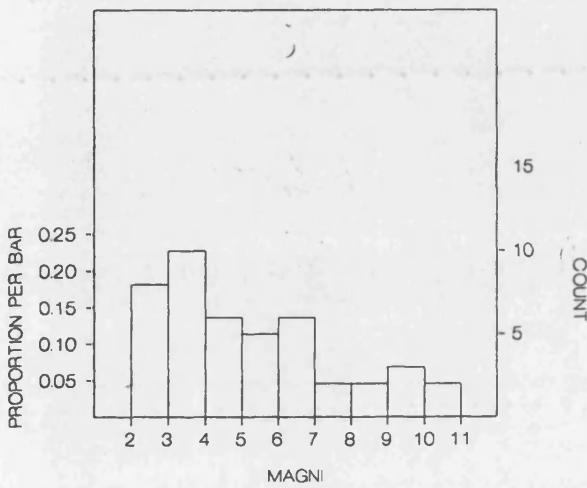
| | |
|-----------------------|-------------|
| 1. H. Hedtoft | 1939 - 1955 |
| 2. H.C. Hansen | 1955 - 1960 |
| 3. V. Kampmann | 1960 - 1962 |
| 4. J.O. Krag | 1962 - 1972 |
| 5. A. Jørgensen | 1972 - 1987 |
| 6. S. Auken | 1987 - 1992 |
| 7. P. Nyrup Rasmussen | 1992 - |

2. The Conservative People's Party (Konservative Folkeparti)

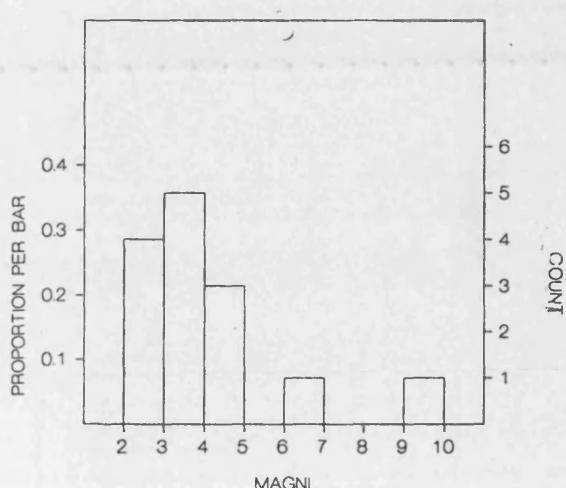
| | |
|----------------------------|-------------|
| 1. J. Chr. Møller | - 1947 |
| 2. O.B. Kraft | 1947 - 1955 |
| 3. A. Møller | 1955 - 1958 |
| 4. P. Sørensen | 1958 - 1962 |
| 5. E. Haunstrup Clemmensen | 1962 - 1968 |
| 6. P. Møller | 1968 - 1971 |
| 7. E. Ninn Hansen | 1971 - 1974 |
| 8. P. Schlüter | 1974 - 1993 |
| 9. H. Engell | 1993 - |

Appendix 3. THE CABINET RECOMPOSITION MAGNITUDES
Systemic profiles of the recomposition magnitude

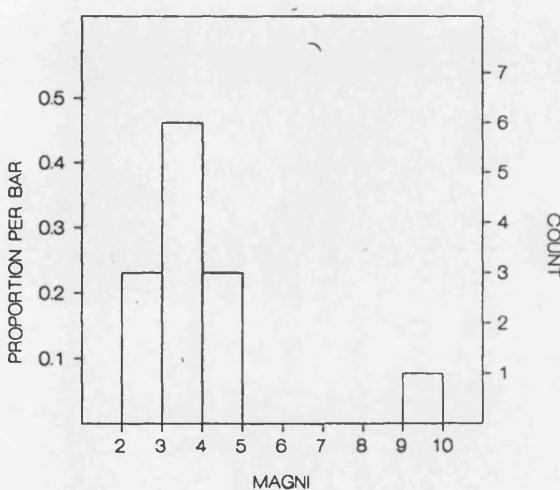
BRITAIN



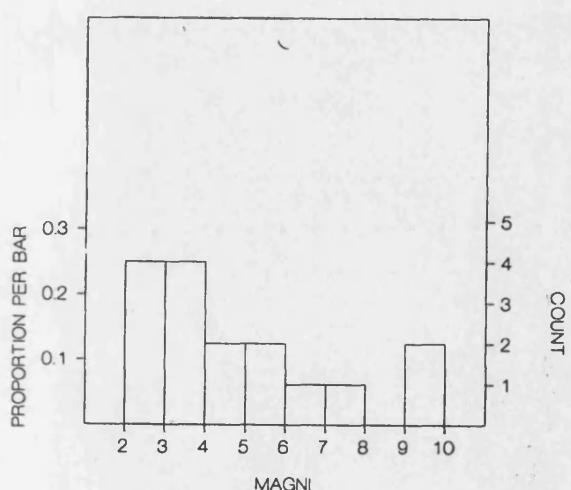
IRELAND



SWEDEN



DENMARK



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