

# The Routledge Handbook Of Parliamentary Administrations

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*Edited by Thomas Christiansen,  
Elena Griglio and Nicola Lupo*

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## Chapter 2

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**A Distinct Role For Parliamentary Administrations  
In Presidential And Parliamentary Systems?**

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## 2

# A DISTINCT ROLE FOR PARLIAMENTARY ADMINISTRATIONS IN PRESIDENTIAL AND PARLIAMENTARY SYSTEMS?

*Cristina Fasone*

### 2.1 Introduction

What relationship, if any, is in place between a certain form of government<sup>1</sup> and the architecture and functioning of a parliamentary administration, which, in turn, affects the way parliamentary institutions work? Indeed, there is a consolidated body of scholarship highlighting the differences shown by democratic systems operating under various forms of government, with the main dichotomy being parliamentarism vs. presidentialism (Elia, 1970; Horowitz, 1990; Lijphart, 1992); however, almost non-existent, beyond this handbook, is the academic reflection on what this dichotomy may imply on the administrative structure of legislatures.

Gradually emerged in England in the aftermath of the struggle between the House of Commons and the Crown, parliamentarism has widely circulated abroad (see Verney [1959] 1992, pp. 31–30, on the defining features of this form of government), has been praised by many for its alleged capacity to resist authoritarianism (at least, until a few year ago: see Linz, 1990a; Ackerman, 2000, p. 664–670 with regard to “constrained parliamentarism”), and is mainly concentrated in Europe as well as in former UK colonies (e.g. Australia, Canada, India, and New Zealand). The interdependence between the legislative and the executive branch – the “fusion of powers” according to the political science literature – is what shapes parliamentarism, through the confidence relationship (Lijphart, 1992, pp. 5–6). Such a relationship can take many different configurations: it can refer to both or either Houses in case of a bicameral legislature, it can be presumed or expressly voted at the beginning of the term, it can be in placed on the Head of Government/Cabinet solely or on the Government as a whole, it may be subject to various degrees of “rationalization” (Mirkiné-Guetzévitch, 1954, 97 ff.), it can be terminated under stricter or looser conditions, and it can be more or less easy for the Executive to call for early elections. To speak about parliamentarism (singular) is in fact an oversimplification of the reality as behind the confidence relationship – the common feature therein – there exists many variations on the model.

Likewise, presidentialism, originated for the first time from the US Constitution of 1787, is not a monolithic category. If the US probably represents a benchmark, few systems have come close to it in terms of checks and balances. With a few exceptions (e.g. see the case of South Korea), in the various areas of the world where it has been “imported”, notably, in South America, in Africa, and in Asia, presidentialism has typically paved the way to a hyper-presidentialization and a too strong executive (Linz, 1990b, pp. 54–55; Scoseria Katz, 2016, p. 214 ff.). The concentration of powers in the hands of a directly elected official in charge as Head of State and Head of Government (Sartori, 1994, pp. 173–181; Dixon, Landau and Roznai, 2019, p. 54), though in presence of a legislature that cannot be dissolved beforehand, has often triggered a marginalization of the Congress (Valenzuela and Wilde, 1979, pp. 189–215; Crisp and Schibber, 2014, pp. 637–643).<sup>2</sup>

During the twentieth century, the “family” of forms of government has witnessed further additions. The Constitution of the French Fifth Republic, indeed, adapted the Weimarian (failed) semi-presidential experience to the post-Second World War democratic context in France, in order to create a system preventing political fragmentation and ensuring stability (De Gaulle, [1946] 1992). Especially after the referendum of 1962, the French model of dual executive has inspired other countries, for example Poland in Europe, Tunisia in Africa, Mongolia in Asia, and Haiti in America to name a few, although the *fait majoritaire* has hardly been replicable elsewhere (Duverger, 1980, pp. 165–187; see Shugart and Carey, 1992, pp. 55–75 and Elgie, 2011, p. 20 ff. on the sub-types of semi-presidential systems).

Although other forms of government have been identified during the last century, from the Swiss (originally in 1798 and, now, according to the 1999 Constitution) and the Uruguayan (1919–1933) directorial regimes, inspired by the Pennsylvania Constitution of 1776 and by the French *Directoire* of 1795, to the prime ministerial form of government, in operation at national level only in Israel and for a limited period of time (1992–2001), the main fundamental difference amongst those regimes lies in the presence or in the lack of the confidence relationship (Lijphart, 1992, p. 6, describing all the other systems as “mixed”). If the focus is the executive-legislative relationship through the confidence, it can be even questioned the categorization of semi-presidentialism as an autonomous form of government, besides its diarchical element: the alleged alternation between presidential and parliamentary phases has hardly materialized, even in France with three experiences of cohabitation only. That’s why in this contribution, semi-presidentialism is mainly associated with parliamentary systems in the democratic countries examined.

What does the choice of a certain form of government imply for the legislature and for the parliamentary administration? In principle, it seems that the more autonomous a legislature is from the executive (e.g. in the US presidentialism), in terms of power to shape the political directions of a given system (and, potentially, to prevent the executive from implementing its agenda), the more its law-making and oversight capacity increases. By contrast, this could lead to think that the expectation for political systems based on the confidence relationship, notably parliamentary systems and even more so semi-presidential systems modelled on the French example (Kerrouche, 2007, pp. 336–340), is to have legislatures strongly dependent on the executive.<sup>3</sup> Should these hypotheses be confirmed, then we can expect particularly well-equipped congressional administrations (as for the size, the budget, and the status of autonomy), supporting the law-making and scrutiny activity of legislatures in presidential regimes, and a modest parliamentary staff in systems articulated around the confidence relationship, maybe even with a certain degree of reliance on the executive’s administration.

However, not only scholars in the field of legislative studies have shown that a specific form of government is not necessarily the determinant of a legislature’s strength (Polsby, 1975;

Mezey, 1979; Norton, 1990) but also similar conclusions are not that straightforward when applied to parliamentary administrations either, according to a comparative analysis carried out on the country chapters collected in this volume. On the one hand, the form of government is just one of the variables affecting the actual powers and influence of a legislature. The electoral system, the party system, the majoritarian or consensual model of democracy followed, the political composition of the Cabinet/Government (one-party majority government, coalition government, or minority government), the way the confidence is given and withdrawn, and the actual degree of separation of powers can trigger very different dynamics compared to what is expected. For example, in the presence of two parliamentary systems, normally the capacity of a Parliament to influence the legislative process is higher where coalition governments are paired with a consensual style of democracy, like in Germany (Saalfeld, 1996, p. 68 ff.; Fish and Krönig, 2009, p. 261–265), than in jurisdictions where coalition and minority governments (so far) have been the exception and there is a clear majoritarian imprinting in the political dynamics, like in the UK (according to a traditional understanding, see Griffith, 1974, which has been recently challenged by Russell and Gover, 2017, p. 47 ff.). By the same token, despite a system is formally presidential, the *modus operandi* can be far away from the US separation of power model and rely on (informal) coalition agreements with a heavily fragmented political landscape, like in Brazil (Mainwaring, 1997, p. 55; Santos and Saboia Vieira, 2022).

This contribution argues, in turn, that no conclusive evidence can be found about the relationship between a certain form of government and the size and organization of the administration of a legislature although a few trends can be detected. For instance, the size of the parliamentary administrations and the budgetary autonomy tend to be more prominent in presidential systems than in parliamentary systems, as well as the supporting apparatus/agencies carrying out research activities and the budget assessment. Likewise, the system of recruitment and the status of the parliamentary staff seem to be much more independent from party politics in parliamentary and semi-presidential systems compared to presidential regimes.

Much more blurred is the evaluation of other features like the administrative support Parliaments get at the committee level, which seems largely dependent on the actual powers and autonomy standing committees enjoy along the law-making process, or the ratio between MPs' staff and non-partisan parliamentary officials.

These conclusions are drawn from a comparative analysis of the legislatures in some presidential regimes (Argentina, Brazil, Cyprus, Korea, Mexico, South Africa, US, plus the European Union [EU], and the European Parliament),<sup>4</sup> showing different levels of autonomy from the executive and following various political dynamics; from a selection of parliamentary regimes (Germany, Israel, Italy, Spain, and the UK) and of semi-presidential systems (Austria, France, Poland, Portugal, and Finland, which is semi-presidential in name only and is, *de facto*, a parliamentarism).

## **2.2 Analytical Framework**

The study first considers the level of budgetary autonomy of a legislature, the size of the parliamentary staff, and its status, notably its degree of independence from politics and the ratio between “partisan” and “non-partisan” staff. Relatedly, it delves into the methods of recruitment, including the autonomy of the parliamentary system of selection vis-à-vis the convergence with the career in the (general) civil service.

Indeed, one can hypothesize that the autonomy enjoyed by a Congress under the US archetype of presidentialism can lead legislatures in this regime to resort to more human and financial

resources than in systems based on the confidence relationship, where they can rely on the active collaboration with the executive – and are to the same extent depend on the government – to fulfil the same functions. It can also be expected that in parliamentary and semi-presidential systems the parliamentary staff is predominantly independent from the civil service and less partisan compared to presidential regimes, where on average there is more emphasis on the individual work of congressmen and on their influence as legislators (according to the strand of scholarship applying behavioural studies and rational choice theory to the study of the Congress: see, critically, Shepsle and Weingast, 1984, pp. 150–152) rather than on parliamentary structures and bodies and in general on the collective dimension of parliamentary activities.

Second, the study is intended to shed light on the differences – if any – between presidential systems and regimes based on the confidence relationship for what concerns the research support offered to MPs by the parliamentary administration, in terms of resources devoted to research and the organization, for example whether research services are articulated by standing committees and whether they work on demand of individual MPs or just assist the activities of parliamentary bodies at large. For the reasons pointed out above, it could be anticipated that in presidential systems MPs are more likely to have direct access to individual research support compared to “fused power systems” and, possibly, given the alleged independence from the executive, also in terms of information supply, in presidential regimes, the “investment” on research resources a Congress has to bear is higher.

Third, the contribution focuses on the way the policy-making process on the budget is supported by the parliamentary administration, in particular if independent agencies – independent fiscal institutions – supporting the legislatures are set up to this end. Indeed, it is expected that, due to the strong ties between the Parliament and the Government, in parliamentary and semi-presidential systems, the legislature would be more inclined to rely on the budgetary inputs and information provided by the Treasury and, consequently, would be less likely to set up their “own” fiscal council (on these agencies, see Beetsma and Debrun, 2016; Closa Montero, González de León and Losada Fraga, 2020), besides the internal administrative support offered by budgetary services. Thus, one can envisage the creation of parliamentary budget offices predominantly in presidential systems, as Congresses there otherwise lack the knowledge to deliberate on fiscal issues.

### **2.3 Comparative Assessment**

The three main areas of investigation, namely the physiognomy of the parliamentary administration (budgetary autonomy, size and composition of the staff, the method of recruitment, and its status), the administrative structures devoted to research in relation to the committee system, and the parliamentary agencies/bureaucracies dealing with the budget, form the object of a comparative assessment of various legal systems. This allows not only to draw evidence on similarities and differences amongst presidential, semi-presidential, and parliamentary regimes but also to consider variations within the same type of form of government aiming to detect further factors potentially affecting a certain configuration and functioning of the parliamentary administration.

To this end, the analysis includes parliamentary systems with a high level of political fragmentation and instability, like Italy and Israel, systems that have traditionally been defined as majoritarian, like the UK, or highly stable, like Spain, though they have recently experienced new dynamics, and systems featured by a consensual model of democracy (Germany and Finland). Likewise, the research on presidential regimes encompasses legal systems characterized by different degrees of separation between the legislature and the

executive and of operation of checks and balances mechanisms ranging from the stable democratic systems in the US, Korea, and Cyprus to systems with tendencies to overstretch the executive and presidential powers, like Argentina, Mexico, and South Africa, to a country, Brazil, where this trend is combined with a highly fragmented political systems and coalition governments. Finally, in semi-presidential regimes, there are systems where the legislature is highly influential and resilient to change, like in Austria (Fasone, 2014, p. 22) and in Portugal (Jancic, 2016, pp. 242–243), and countries where the Parliament is marginalized and confined in its power *de iure*, like in France (Rozenberg, 2019, pp. 45–65), or *de facto* like in Poland since 2015 (Maatsch, 2021, p. 786 ff.). The comparison will also include the case of the European Parliament (EP) and the European Union, which is not easy to fit into one specific form of government. As well known, some highlight the EU’s aspiration to resemble the US system (Fabbrini, 2010, pp. 53–79) and, consequently, the EP’s attempt to look at the US Congress as a model (Kreppel, 2006, p. 137 ff.). Others, instead, have insisted on the necessary political “consonance” between the Commission’s President (and the College of Commissioners) and the majority in the EP, also based on Arts. 14, para 1, and 17 post-Lisbon (Lupo and Manzella, 2019, pp. 63–67). Further to this, other scholars have hinted to the similarities with systems based on a dual executive, like semi-presidentialism – both collective in the case of the EU, looking at the European Council and at the Commission (Bonvicini, Matarazzo and Tosato, 2009, p. 179 ff.).

### **2.3.1 *The Physiognomy of Parliamentary Administrations: Budget, Staff, and Method of Recruitment***

A first element to look at is the degree of budgetary autonomy a legislature enjoys,<sup>5</sup> as in turn this determines the level of instrumental and human resources the institution is capable to mobilize. Most legislatures examined benefit from complete spending autonomy, even though the budget of the legislature is part of the general budget of state (see Konrath, Pollak and Slominski, 2022, on Austria; Karayianni, 2022, on Cyprus; Raunio, 2022 on Finland; Tacea, 2022 on France; Arndt, Högenauer and Koggel, 2022, on Germany; Kölling and Molina, 2022 on Spain), and/or the budget is requested to comply with the general spending rules for the public administration or with the ceilings set by the Government (see Santos and Saboia Vieira, 2022 on Brazil; Nieto–Morales, 2022 on Mexico; Meakin, Yong and Leston-Bandeira, 2022 on the UK). Even where complete budgetary autonomy is ensured (see Hattis Rolef, 2022 on Israel; Lupo and Gianniti, 2022 on Italy; Guahk, 2022 on Korea; Serowaniec, 2022 on Poland; Vargas, Dias Pinheiro and Fonseca, 2022 on Portugal; and McKay and Johnson, 2010, p. 94, on the US),<sup>6</sup> typically the resources at Parliament’s disposal were committed from the general national budget (see for more details, Table 2.1). In a couple of parliamentary systems, notably Finland and Spain, the draft budget for the legislature is submitted by the executive, although the former can certainly amend it (European Parliament, Directorate–General for Research, 1997, p. 1). Interestingly, in a presidential system like South Africa, in addition to the tabling of the (congressional) budget by the Treasury, the budget of the two Houses of Parliament is set through the ordinary budget process and no “special” autonomous procedure is regulated (Layman, 2022).

No clear pattern can be detected between the level of budgetary autonomy of a Parliament and the form of government in which it is embedded. Rather, it seems that the way the budget of the legislature is devised depends on the status of the parliamentary administration – for example, whether it is part of the general civil service. Relatedly,

Table 2.1 Forms of government vis-à-vis budgetary autonomy, parliamentary staff's size, status, and system of recruitment

Country	Form of government	No of MPs/senators	Budget	Staff (2019–2021)	Method of recruitment
Argentina	Presidential	257 Reprs in the Chamber and 72 senators	N/A	More than 12,500 people (5,000 in the Chamber, 5,000 in the Senate, and 2,500 in the supporting agencies, like the Library)	Mainly political patronage (most staff members are those of party groups and individual members), except for the Administrative Technical Staff. High level of unionism
Austria	Semi-pres.	18 members of the National Council; 61 members of the Federal Council (joint administration)	No complete budgetary autonomy included within the federal budget	432 permanent staff members plus contractors	Public competition as per the civil service rules for the permanent administrative staff. Staff recruited by parliamentary groups and MPs very influential to provide policy expertise
Brazil	Presidential	513 deputies (Chamber of deputies only)	Complete budgetary autonomy, but subject to the federal public administration spending rules	13,900 people: permanent employees (2,742), commissioned employees (1,787) and freely appointed employees (9,376)	Only permanent employees appointed following public competition and examination; commissioned employees recruited by political groups; the others appointed to support individual MPs
Cyprus	Presidential	56 MPs	The House of Representatives' Budget is part of the State budget, but spending autonomy	137 permanent staff members	Public competition
EU – EP	Mixed (strong presidential features in parliamentary setting)	705 MEPs	Complete budgetary autonomy	5,400 permanent staff members and 1,113 contract agents + staff of political groups (1,135) and of individual MEPs (1,941)	75% of the staff (permanent) recruited through the EPSO competition. Staff of political groups may manage to enter the Administration

(Continued)

Table 2.1 Forms of government vis-à-vis budgetary autonomy, parliamentary staff's size, status, and system of recruitment (Continued)

Country	Form of government	No of MPs/senators	Budget	Staff (2019–2021)	Method of recruitment
Finland	Semi-pres., but with parliamentary dynamics	200 MPs	Budgetary autonomy in spending, but the Eduskunta's budget is part of the state budget (draft budget proposed by the Government)	520 staff members + party groups' staff and, to a lesser extent, individual MPs' staff	Staff within parliamentary administration recruited to public competitions/tenders or ad hoc contracts (for advisors)
France	Semi-pres.	577 MPs (National Assembly only)	Budgetary autonomy in the framework of the State budget	Around 1,300 parliamentary officials (1,110 public <i>fonctionnaires</i> and 184 contract agents). About 2,100 MPs' staff	Public competition for parliamentary officials
Germany	Parliamentary	709 MPs in the Bundestag (minimum 598) and 69 seats in the Bundesrat	Budgetary autonomy in spending, but the Bundestag's budget is part of the federal budget (Ministry of Finance involved)	Approximately 3,000 employees for the Bundestag plus political groups' staff and MPs' individual assistant (4,000); 7,000 on the whole	Public competition for the employees (or internal calls for the vacancies). Limited level of interchangeability between parliamentary staff and the staff of other public administrations
Israel	Parliamentary (formally Prime-ministerial from 1992 to 2001)	120 MPs	Complete budgetary autonomy	Over 700 Knesset's employees, plus 240 Knesset's Guards. Mostly with full-time permanent contracts	External tenders and internal call for applications for vacancies, with merit-based selection. Ad hoc selections procedure for the legal advisor
Italy	Parliamentary	630 deputies and 315 senators	Complete budgetary autonomy (resources committed from the State budget)	1,042 employees in the Chamber; 585 employees in the Senate + staff of the groups (increased substantially), and individual MPs and senators' staff	Public competition for the employees

(Continued)



Table 2.1 Forms of government vis-à-vis budgetary autonomy, parliamentary staff's size, status, and system of recruitment (Continued)

Country	Form of government	No of MPs/senators	Budget	Staff (2019–2021)	Method of recruitment
Korea	Presidential	300 MPs	Complete budgetary autonomy	Around 2,000 employees (civil servants)	Public recruitment process (national competition when there is a vacancy). Limited level of interchangeability between parliamentary staff and the staff of other public administrations
Mexico	Presidential	500 MPs in the Chamber of Deputies and 128 members in the Senate	Budgetary autonomy within the federal budgetary framework	Around 2,400 employees (civil servants) in the Chamber; around 600 civil servants and 130 non-tenured contract agents in the Senate	Recent establishment of parliamentary civil service. Officials recruited through a competitive selection procedure
Poland	Semi-pres.	460 members in the Sejm and 100 in the Senate	Complete budgetary autonomy	1,295 employees in the Sejm; 331 in the Senate	Parliamentary civil servants recruited through ad hoc public competition
Portugal	Semi-pres., but with parliamentary dynamics	230 MPs	Complete budgetary autonomy	418 employees (parliamentary civil service)	Employees recruited through a public competition
South Africa	Presidential	400 members in the National Assembly; 90 in the National Council	Budget of the two Houses of Parliament set through the ordinary budget process (for the federal budget) by the National Treasury	1,309 officials work for the Parliament of South Africa as a whole	Parliamentary staff part of the (general) public administration and subject to recruitment through a competitive procedure

(Continued)

Table 2.1 Forms of government vis-à-vis budgetary autonomy, parliamentary staff's size, status, and system of recruitment (Continued)

Country	Form of government	No of MPs/senators	Budget	Staff (2019–2021)	Method of recruitment
Spain	Parliamentary	350 deputies and 265 senators	Budgetary autonomy in the framework of the State budget (draft budget of the two Houses incorporated into the general budget and proposed by the Government)	383 parliamentary employees, 65 contracted staff members, and 280 temporary staff members in the Congress; 250 parliamentary employees and 72 contracted staff members in the Senate	Public competition for the selection of the parliamentary employees
UK	Parliamentary	650 MPs in the House of Commons; approximately 820 peers in the House of Lords	Budgetary autonomy within general ceilings set by the Government	Almost 4,000 permanent staff: around 3,000 in the Commons and 570 in the Lords. Additionally, around 3,200 staff for individual MPs in the Commons	Permanent staff qualified as “crown servants” (rather than civil servants). Competitive selections procedure for the recruitment
US	Presidential	435 Reprs and 100 senators	Complete budgetary autonomy	Roughly 20,000 people, excluding the Library	Political patronage. Parliamentarians, the Legislative Counsel (bill drafters), Law Revision counsel (codifiers of enacted law), and Inspector General appointed solely on the basis of the ability to fulfil the office's duties (and impartiality)

Source: Country reports collected in the Handbook and websites of the selected legislatures.

it is affected by the length of the process of gradual autonomization of the recruitment and of the rules on the parliamentary staff from the staff of the public administration, which in some countries, like Austria, has taken decades (Konrath, Pollak and Slominski, 2022) and in South Africa is still underway (Layman, 2022). In general, a trend towards increasing budgetary autonomy of Parliaments does exist, in parallel with the consolidation of constitutional democracies, while the budgetary cuts and the spending review that have affected the public administration as a whole over the last decade also had an influence on legislatures, though to a lesser extent.

When it comes to the size of the budget, instead, hints of a connection with the form of government becomes more apparent. The capacity of the budget is indeed directly linked to the cost of the personnel working for the Parliament at large (including its independent agencies), and we do see that in presidential systems the size of the congressional staff is on average bigger than in parliamentary regimes, which is subsequently reflected on the financial resources needed. The cases of the US, Argentina, Brazil, and, to a lesser extent, Mexico, Korea, and the EP<sup>7</sup> are a testament to that, with a size of the staff in a few cases above 10,000 employees, and compared to the number of MPs served (see Table 2.1). Semi-presidential systems follow immediately after when looking at the budget and at the staff available compared to the seats in Parliament (see the cases of Austria, France, Poland, and Portugal). In comparison, in some parliamentary regimes, legislatures seem understaffed and with a much smaller budget, as the cases of Italy (Lupo and Gianniti, 2022) and Spain (Kölling and Molina, 2022) show. There are a few outliers in this respect, like South Africa in presidential regimes, with a limited-size parliamentary staff, or Germany amongst parliamentary systems, with over 3,000 permanent employees in the Bundestag only.

However, more interesting is to give a closer examination on the composition of the parliamentary staff. The cases of the US Congress and of the legislatures in presidential systems following this model show that only a slight minority of the employees there are hired as permanent officials, with a non-partisan “mandate”. In the US Congress, only the parliamentarians (fewer than ten), the Legislative Counsel (bill drafter), the Law Revision counsel (codifying enacted laws), the Inspector General, the General Counsel, and the Historian are expected to act impartially like civil servants, although they are not recruited through a public competition (McKay and Johnson, 2010, p. 95; Peters, 2022). Likewise, in Argentina, the greatest part of the congressional staff is selected through political patronage by party groups or individual MPs (Bertino, 2022), and in Brazil, of the almost 14,000 staff members of the Chamber of deputies, “only” 2,742 are permanent employees recruited through public competition (Santos and Saboia Vieira, 2022). By the same token, in Mexico, the establishment of a fully fledged parliamentary civil service is very recent and the staff used to be recruited through a mechanism of “spoils system” (Nieto-Morales, 2022). What characterizes presidential regimes in the Americas, however, does not appear to apply to some presidential systems in other continents. For instance, the parliamentary staff of the Korean National Assembly – around 2,000 employees – enjoy the status of civil servants, selected through a public recruitment process based on a nation-wide competition whenever there is a vacancy (Guahk, 2022). Moreover, the practice shows a limited level of exchange between the parliamentary staff and the staff of the other administrations. The situation is very similar at the Cypriot House of Representatives (Karayianni, 2022) and, to some extent, at the EP, should one regard the EU dynamics as presidential. Indeed, while especially in the past it was not infrequent for the personnel of political groups to manage to enter the EP’s administration, today more than 75% of the permanent staff working for this institution is recruited through the European Personnel Selection Office (EPSO)

competition (Jacobs and De Feo, 2022). By the same token, the officials at the Parliament of South Africa are recruited through a competitive procedure but form part of the general public administration and a process of reform is currently underway to create an ad hoc unitary status and system of recruitment for the officials working at the legislatures placed at the various levels of government in the country (the proposed establishment of a Parliament and Provincial Legislatures' Service, on which see Layman, 2022).

By contrast, it is much more common in parliamentary and semi-presidential systems the attempt to keep the process of selection of the parliamentary administrators and their status separate from those of the other institutions and from the civil service in general (with a very limited, almost non-existent, level of inter-changeability between parliamentary employees and other civil servants). For instance, in the UK, the permanent staff at Westminster are qualified as "crown servants", different from the civil servants (Meakin, Yong and Leston-Bandeira, 2022). In connection to this, *ad hoc* public competitions are organized to select parliamentary officials, which by definition are expected to act in a politically neutral and impartial way (in Finland, see Raunio, 2022; in France, see Avril, Gicquel and Gicquel, 2021, pp. 131–138; in Germany, see Arndt, Högenauer and Koggel, 2022; in Italy, see Lupo and Gianniti, 2022; in Poland, see Serowaniec, 2022; in Portugal, see Vargas, Dias Pinheiro and Fonseca, 2022; in Spain, see Kölling and Molina, 2022; in the UK, see Meakin, Yong and Leston-Bandeira, 2022). In some legislatures, for example in the Israeli Knesset, the recruitment process may differ depending on the office, with the legal advisors selected through a very cumbersome and multi-step process (Hattis Rolef, 2022).

Overall, in the parliamentary and semi-presidential systems under review, there seem to be, on the one hand, an influence of the European continental-French model of recruitment of public administrators, preferably through *concours* (Campbell and Laporte, 1981, p. 522); on the other, the choice to separate the career of the parliamentary administrators from that in the civil service may depend from an attempt to strengthen parliamentary autonomy, in front of the government that in such systems tends to act as the "executive committee" of the legislature (Elia, 1951, pp. 59–66 drawing on Laski, 1944, pp. 347–359). In other words, the parliamentary administration appears instrumental to provide support to all MPs on an equal footing and in an impartial way regardless of their positioning within the majority or in the opposition.

While the patent partisan dynamics within the parliamentary administration are a feature of the US Congress and of the above-mentioned presidential systems that try to emulate it – administrators are chosen because of their political affiliation and no restrictions are set for the staff to run in electoral campaigns or to take political offices – it should be noted that the number of employees working as individual MPs' staff and for political groups, rather than as parliamentary officials (subject to different recruitment procedures and status), has increased in most of the legislatures analysed over the past few decades. The trend is possibly the outcome of two different factors. One influential factor is certainly the electoral system: majoritarian systems and, in particular the first-past-the post, may favour political dynamics that emphasize the individual activities of MPs, aiming to seek re-election, and their individual weight in parliamentary proceedings. As a consequence, MPs tend to give pre-eminence to gain the support from a numerous and well-experienced personal staff, which may be trusted more than the parliamentary officials. Another important factor paving the way to the increase in the personnel directly working for the groups and for individual MPs is the block in the turnover of the parliamentary officials and the lack of public competitions held to recruit new administrators as a consequence of budget cuts. In these circumstances, as demonstrated by the cases of Italy (Lupo and Gianniti, 2022) and Portugal (Vargas, Dias

Pinheiro and Fonseca, 2022), the resort to the “political staff” – however different is their contractual status – aims to compensate a too small body of parliamentary civil servants to cope with the many functions legislatures and legislators have to fulfil.

### ***2.3.2 Support for Committees and Parliamentary Administrative Structures Devoted to Research***

Committees, in particular the permanent ones, have famously been labelled as the “backbones” of legislatures (Westlake, 1994, p. 191, with regard to the EP). In law-making, the strength of committees is what defines the strength of a parliamentary institution, in terms of capacity to shape the content of legislation and to oversee the executive (Barthélemy, 1934, pp. 58–59; Shaw, 1998, p. 229; Strøm, 1998, pp. 21–59). It follows that the administrative support standing committees are given is of the utmost importance for a legislature to control the law-making procedures. An important part of this support consists in carrying out bill-related research activities that can inform a well-thought deliberation by MPs and especially committee members.

The extent to which a certain form of government influences the architecture and the functioning of the parliamentary standing committee system has been subject to investigation over the last decade (see, e.g. Fasone, 2012, pp. 197 ff.). In that case, it has been concluded that looking at some prototypical case studies of presidential (US), semi-presidential (France), and parliamentary (Italy and the UK) regimes, there is an expectation that for presidential systems to have powerful committees is instrumental to preserve the functioning of the checks and balances mechanism, while this presents some problems when a divided government is in operation (Wilson, [1885], 2009, p. 110). In parliamentary systems, one can expect for the physiological development of the executive-legislative relationship that the government can count on a solid parliamentary majority in committees seconding, wherever possible, the political direction of the executive (Capitant, 1934, p. 10). From this perspective, at least until the 1990s, the functioning of the Italian committee system and its overarching influence on law-making has resembled more that in the US Congress than in other parliamentary regimes (D’Onofrio, 1979; Della Sala, 1993). Finally, the example of the French Fifth Republic showed a deliberate attempt to confining the influence of the Parliament by limiting the power and the configuration of its few and big standing committees (Shaw, 1998, pp. 231–232).

Including more countries into the analysis reveals that there is indeed a connection between the presidential nature of the form of government, the centrality of committees and the level of support they get in terms of research. In the presidential regimes studied, standing committees are the linchpins of law-making, they are numerous, of small size, and well-staffed (perhaps with the exception of Cyprus, see Karayianni, 2022), and they can count on the supply of studies and information by a Research Service that also works upon request by individual MPs, whether they step up as committee members or not. While the Research Services always provide impartial and non-partisan support to committees’ and MPs’ activities, in some presidential systems, notably in the US and Argentina, the committee staff is eminently partisan. In the US House of Representatives, except for three committees, professional staff members are appointed for two-thirds by majority members and for one-third by minority members, whereas in the Senate staff appointment in committees reflects the overall ratio of senators from each party (McKay and Johnson, 2010, p. 377).

Such a level of partisanship is unknown to parliamentary and semi-presidential systems: committee members may well be assisted by their own staff or by the staff of their groups, but this comes in addition to parliamentary clerks and officials assigned to a specific committee

as part of the legislature's administration. Beyond such a feature, it is almost impossible to trace a link between the organization of the research support towards committees and the parliamentary/semi-presidential nature of the form of government. The arrangements could not be more varied. In some legislatures, like the German Bundestag, the two Houses of the Italian Parliament, the Israeli Knesset, and the European Parliament (though, as anticipated, the placement of the latter in one specific form of government is troubled), there is a Research Service, inspired by the US Congressional Research Service (Peters, 2022), further articulated according to the committees' remits, and that supports parliamentary activities besides the parliamentary officials working in the secretaries of the various committees. In other parliamentary/semi-presidential regimes, like in the French, the Spanish, and the UK Parliaments, there is no "autonomous" Research Service or Division linked to the committees' competence by subject matters and the standing committees themselves are quite marginalized in law-making.<sup>8</sup> In Spain, their role in the legislative process is often bypassed and they have scarce resources (Kölling and Molina, 2022). In the UK, where there are no standing committees regularly involved in the legislative procedures, there is no even an ad hoc committee service (chamber and committees' staff are part of the same service), but there are teams of clerks (from 6 to 8) working for the select committees, in charge with the scrutiny and the oversight of the executive only (Meakin, Yong, Leston-Bandeira, 2022). Likewise, in the French National Assembly, besides lacking a Research Department, there is no dedicated committee service and the committees' secretariats are scattered around different thematic poles, each of which includes several divisions (Tacea, 2022). Some legislatures make extensive use of external advisors (e.g. in the UK and Finland), while the European Parliament regularly involves external experts by outsourcing studies and reports.

As such, unlike for presidential regimes, the presence of the confidence relationship only does not seem to be a determinant of the configuration of the administrative support run for committees nor of the setting up of a Research Department supplementing information to committees, more rarely to individual MPs (in the EP for instance). Looking at the cases considered, as a preliminary conclusion to be subject to further investigation in the future, it appears that important variables in this context are the influence exerted by and "imported" from the model of the US Congress, the powers granted to committees by the law, the consensual nature of the political dynamics, and the inclination to see in the committees the places where the compromise is reached along the law-making process (Strøm, 1998, pp. 27–28).

### ***2.3.3 Parliamentary Bureaucracy and Agencies Dealing with the Budget***

The power of the purse, grounded on the principle "no taxation without representation", is probably one of the most distinctive features of parliamentary institutions and, around that, the struggle for their autonomy and strengthening has been advanced over the last centuries. This does not mean, however, that the budgetary powers of legislatures are alike and manifest differences have emerged. Here the divide between presidential and parliamentary/semi-presidential systems appears to have an explanatory value.

Indeed, in regimes where the bond between the executive and the legislature revolves around the confidence relationship, the budgetary procedures and the content of the budget itself have become visibly shaped by the Government even though the Parliament can pass amendments and is ultimately called to approve the budget in order to have it in force (Bateman, 2020, pp. 5–13). The marginalization of Parliaments in the budget process has been a problem increasingly felt in Europe in the aftermath of the debt crisis and especially

in those countries, like Greece, Ireland, Portugal, and Spain receiving financial assistance (Moschella, 2017, p. 243 ff.).

By contrast, in presidential regimes, the capacity of the Parliament to influence the budget seems higher, also due to the lack of confidence votes to be used by the executive (increasingly in parliamentary systems) as a leverage to pressure the legislature on budgetary procedures. Congresses tend to remain the *domini* of the budget process once it has started and from time to time they have not hesitated to delay and veto budgetary decisions (McKay and Johnson, 2010, pp. 226–305). The (in)famous cases of the budget shutdown in the US or the veto of the Cypriot House of Representatives to the first rescue package in 2013 confirm the reach and scope of the congressional power of the purse. Instead, the veto on a budgetary document and act by a legislature in a parliamentary regime, as occurred in Italy in 2011 and in Spain in 2019, are seen as a symptom of the mal-functioning of the system and of a *de facto remise en cause* of the confidence relationship, although formally speaking this could remain untouched.

All the legislatures included in the comparative analysis can rely on ad hoc budget services,<sup>9</sup> but their position in relation to the parliamentary administration and reach of functions vary a lot. In general, such administrative support on budgetary policy has been established from the 1970s onwards and the Congressional Budget Office (CBO), set up in 1974, has been a benchmark worldwide. The support offered is linked to the expertise in economic and fiscal matters, is non-partisan and objective, and the selection of the relevant employees is merit-based (Joyce, 2011; Peters, 2022).

Various organizational arrangements have been devised in parliamentary and semi-presidential systems. For example, in Italy, the Budget Services of the Chamber of Deputies and the Senate were created in 1988–1989, in the aftermath of an important reform of the State Budget (Law no. 362/1988) and supply information on the reliability of the budget accounts, on the effects of bills on the revenues and expenditures and they mainly support the Budget Committees, though not exclusively. In the French National Assembly, instead, the budget falls within the remit of one of the 12 legislative services, notably on public finances. What these budget services have normally in common in regimes based on the confidence relationship is that they are internal to the parliamentary administrative structure and they serve the activity of parliamentary bodies, in particular Budget Committees and the Assembly, but they do not act on demand of individual MPs.

In several presidential systems, namely in Argentina, Korea, Kenya, Mexico, South Africa, and US, the need to rely on autonomous sources of information and evaluation on the budget seems to have paved the way to the setting up of independent fiscal agencies, formally placed outside the Congressional administration, but in fact serving the Congress only.<sup>10</sup> Modelled on the CBO, these agencies tend to act as fiscal think tanks enhancing the transparency and the publicity of budgetary information and supplying figures and data also upon request of individual Congressmen.

While the World Bank and the OECD have been advocating for the setting up of these institutions since decades, only some of them, and preferably in presidential systems and outside Europe (Closa Montero, González de León and Losada Fraga, 2020), have been established having strong bond to the legislature: they are not part of the parliamentary administration, and that's why they are recognized as independent fiscal institutions, but their staff do work for the Parliament in an impartial and non-partisan manner. In a few parliamentary systems (Australia, Canada and Italy<sup>11</sup>), trying to emulate the US CBO, parliamentary budget offices have been established lately. Not by chance this move was done in systems whose legislatures have been trying to keep their influence on the budget process



or to re-balance their marginalization against the backdrop of the mounting executive dominance (Wehner, 2010, p. 53; Bateman, 2020, p. 199 ff.). They are a minority, nevertheless, and most parliamentary/semi-presidential systems have created independent fiscal institutions as stand-alone bodies, within other independent authorities (the central banks or the courts of auditors) or within the executive, though remaining functionally autonomous (Merlo and Fasone, 2021, Appendix), and while keeping budget services inside the parliamentary administration.

## **2.4 Conclusion**

There is no clear-cut influence of the form of government and, in particular of the presidential vs. parliamentary divide, on the structure and the functioning of parliamentary administrations. To be more precise, the comparative analysis reveals some common trends featuring prominently within the “family” of the presidential systems, like the high level of budgetary autonomy, the considerable size of the internal budget and of the staff as well as its partisanship, the operation of congressional budget offices, the key role of the administrative support vis-à-vis standing committees in addition to the relative autonomy and impartiality of Research Services, which also serve individual MPs. However, these considerations apply mostly to the presidential systems that have tried to follow, more or less successfully, the US Congress as a benchmark and one can hardly find all these characteristics together in every presidential democracy examined.

By the same token, also in parliamentary (and semi-presidential) systems, there is a high degree of variation besides some common traits. Amongst the latter one can include the presence of a predominantly impartial and non-partisan parliamentary bureaucracy, with a status different and autonomous from the general civil service, and recruited through public competitions; possibly in an attempt to build a certain level of autonomy from the executive and its administration. Another recurrent feature, with few exceptions, is the “incorporation” of budget services within the parliamentary administration compared to the model of the independent agencies like the parliamentary budget offices. When it comes to the administrative structures to support the standing committees and the research activities, the comparative assessment shows very different institutional arrangements, depending on the functions and the strengths of those committees.

On certain issues, there are more visible similarities across presidential and parliamentary/semi-presidential systems than within the same type of form of government. For example, on the recruitment and the impartiality of the parliamentary staff, the Congresses of countries like Cyprus and Korea come closer to most parliamentary systems in Europe than to other presidential systems. Likewise, in some parliamentary democracies, like Finland, Germany, and Italy (and in the EP), the centrality of the administrative support to committees and the design of the Research Service (deliberately) resemble more the US Congress than other fellow Parliaments across the EU.

Furthermore, a few general trends can be detected from the comparative analysis, again, regardless of the form of government. Amongst them, there is the global tendency of Parliaments to let the proportion of political groups and individual MPs’ staff on which they rely increase compared to parliamentary officials and civil servants: a feature that may depend, on the one hand, on the difficulty to recruit new officials and related to budget cuts or to the lack of resilience of the parliamentary administration; on the other, this can derive from the dynamics of the electoral systems and of the party competition, especially in majoritarian regimes, that emphasize the individual dimension of the parliamentary activities rather than



the MPs' membership of the various parliamentary bodies and the collective dimension of decision-making within legislatures.

Other factors triggering a convergence between forms of government and seemingly affecting the organization and functioning of parliamentary and congressional administrations are the widespread executive dominance on law-making (Curtin, 2014) and the shift of focus by Parliaments from legislation only (or predominantly) to scrutiny and oversight (Griglio, 2020). To react to what are in fact common challenges for legislatures, the US Congress is typically used as a source of inspiration in reforming the administrative structures, given its strength within the constitutional system (see the cases of the EP, of the Korean Assembly, and of the Israeli and the Italian Parliaments). This common benchmark, together with the development of an intense interparliamentary cooperation and exchange of best practices amongst legislatures (and parliamentary officials: Fitsilis, 2018; Christiansen, Griglio and Lupo, 2021, pp. 486–489), has probably led to intensify this convergence process. These and other elements require further investigation and a more fine-grained inquiry in order to better understand not only *what* is happening at the level of the parliamentary administrations operating under different forms of government but also *why* we observe such trends.

## Notes

- 1 The notion of form of government used here refers to the distribution of the powers to give political directions (*indirizzo politico*) amongst the constitutional bodies and, in particular, between the executive and the legislative branch (Mortati, 1973, p. 74).
- 2 In this chapter, legislatures will be labelled as Congresses in presidential systems and as Parliaments in parliamentary–semi–presidential systems. On this point, see Kreppel (2014, pp. 84–85). The term “legislature”, however, is much broader, according to a certain understanding, as “the body entitled to make laws” and may not necessarily overlap with representative institutions like Congresses and Parliaments (Fasone, 2019, p. 2): see the view of the US Supreme Court in *Arizona State Legislature vs. Arizona Independent Redistricting Commission et al.* (576 U.S. 787, 2015) arguing, 5 to 4, that the electorate can be qualified as a “legislature” when voting on a ballot initiative to withdraw from the State Congress the power to draw electoral districts and to grant such a power to an Independent Redistricting Commission.
- 3 According to Schlesinger ([1985] 1992), “(...) while the parliamentary system formally assumes legislative supremacy, in fact it assures the almost unassailable dominance of the executive over the legislature” (p. 91). By contrast, “The Congress is far independent from the executive, far more responsive to a diversity of ideas, far better staffed, far more able to check, balance, challenge, and investigate the executive government” (p. 92).
- 4 On the inclusion of the EU and of the European Parliament here, see the justifications provided in para. 2 below.
- 5 By budgetary autonomy, here we mean the extent to which the legislature is able to set its own budget regardless of external influence.
- 6 According to Rules 102–104 of the EP’s rules of procedure, this legislature enjoys complete budgetary autonomy but the salary of the EP’s officials is subject to the same terms and conditions as the other EU civil servants (Corbett, Jacobs and Neville, 2016, pp. 258–259).
- 7 In the case of the EP, the figure of around 6,500 personnel, between permanent staff and contract agents, is also influenced by the multinational and multilingual nature of the institutions (see Jacobs and De Feo, 2022).
- 8 Although there is no “autonomous” Research Service in the Finnish Parliament either (there is an Information Service whose consultation by MPs has declined steadily), there is an ad hoc Committee Department to govern the staff assigned to the numerous and powerful standing committees. The French, the Spanish, and the UK Parliament can rely, nonetheless, on the libraries for carrying out in-depth studies or on administrative structures specialized on certain issues, like the UK Parliamentary Office of Science and Technology.
- 9 Although in some legislatures, like in the Israeli Knesset, the Budget Control Department is established within the Research and Information Centre (Hattis Rolef, 2022).

- 10 In the case of the Mexican Centre for Public Finance Studies, the independence of the body from the legislature has been put into question (OECD, 2015, p. 166).
- 11 In these countries, the setting up of the parliamentary budget offices has not led to dismantle or abolish the existing administrative budget services.

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