The Routledge Handbook Of Parliamentary Administrations

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Chapter 4

The Administration of Bicameral Parliaments

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THE ADMINISTRATION OF BICAMERAL PARLIAMENTS

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4.1 Introduction. Bicameral Parliaments as Complex Institutions: The Puzzle of Administrative Organization

Parliaments are complex and pluralistic organizations (Amellier, 1966; Norton, 1990; Manzella, 2003; Benoit and Rozenberg, 2020). They are called upon to represent political and territorial diversities and to cover at least potentially any subject matter. This implies a rather structured architecture, able to support the high degree of autonomy demanded by each (individual or collegial) political actor and at the same time to promote the development of institutional common outcomes. Procedures are the essential mechanisms for reconciling these potentially diverging requirements: they ensure the involvement of different actors, assigning a prominent role to minor collegial bodies (groups, committees, delegations, bureaux, among others) in order to reduce the pluralism and the diversity at a level that is compatible with the need to achieve a decision (Lupo, 2019; Fasone, 2020).

In the case of bicameral parliaments, the level of complexity is at least doubled, as the internal structure is duplicated in two parallel Houses: these may either be of similar or of dissimilar composition (Mill, 1861), they usually hold different functions and act independently from one other (Rasch and Tsebelis, 1995). Whereas there is no one model of bicameralism and no unique arrangement (Llanos and Nolte, 2003), institutional complexity is a common outcome of all bicameral systems (Massicotte, 2001; Uhr, 2008), because the presence of two, parallel and autonomous, pluralistic structures fosters multiple patterns of interaction, either cooperative or competitive (Diermeir and Myerson, 1999; Bradbury and Crain, 2004). In these polyarchic and networking institutions, maintaining a minimum of structural consistency and institutional continuity is certainly not an easy task, which is up to parliamentary administrations performing.

Parliamentary officials are an essential point of reference both for individual MPs and for collegial bodies regarding any issue concerning the interpretation and application of procedures, the protection of the democratic values and organizational or functional guarantees that are the cornerstone of parliamentary activity (Barrett, 2019; Inter-Parliamentary Union, 2020; Christiansen, Griglio and Lupo, 2021). Since the hardware of parliaments is in their administrative structure, it is extremely important for their effective functioning to clearly identify the linkages between the political and administrative spheres.

"Legislatures" that follow the model of the US Congress[1] tend to adopt a decentralized approach with staffers answering personally to individual MPs (Peters, 2021; Fasone, 2022).[2] By contrast, in European "parliaments", the link between the political and the administrative sphere tends to be more centralized and ordered according to a hierarchical structure, which finds in the Secretary General, directly linked to the Speaker/President of the House, its pivotal actor (Association of the Secretary Generals of Parliaments [ASGP], 2000).[3]

The organizational model adopted in determining the link between politics and administration is the outcome of a series of delicate trade-offs and balances, for example between parliament and government; between unity and diversity; or between party politics and administrative traditions.

All these patterns of interaction are far more relevant when bicameralism is at stake. It can be argued that in bicameral parliaments the nature of the link between the political and the administrative sphere becomes even more of a puzzle: as each House has its Speaker/President and enjoys a certain degree of institutional autonomy, the shape given to the administrative structure creates the potential for a wide range of different arrangements.

The solution adopted in each case can be seen as the result of the stratification of long-standing features, deeply rooted in the history and political culture of each institution and each country (Coniez and Michon, 2020). At the same time, changes in the shape given to parliamentary administrations can be interpreted as an attempt to support and foster some of the major trends affecting the nature and internal structure of bicameral parliaments (Lupo, 2012).

This chapter aims to provide a comparative analysis of the various solutions that parliaments have arrived at in addressing this universal challenge. Based on previous research focused on bicameral parliaments in Europe (Griglio and Lupo, 2021) and on the findings provided by the contributions on individual countries in this Handbook, its purpose is to identify the main administrative formats adopted by bicameral parliaments. In doing so, it highlights the reasons behind the institutional choices and critically debates the advantages and disadvantages involved in these. Towards this aim, the next section presents an overview of the three main formats resulting from the comparative analysis of bicameral parliamentary administrations. Subsequent sections analyse the features of each of these formats, examining the motivations behind choices in favour of a more divided or a more integrated administrative arrangement in bicameral parliaments. This analysis provides the foundation for a summary and a discussion of the implications of the alternative arrangements in the final section.

4.2 Towards a Typology of Bicameral Parliamentary Administrations

The administrative organization of bicameral parliaments as complex institutions follows rather different formats. There is no one-size-fits-all format able to explain how the administrative sphere adapts to the requirements of a bicephalic parliament.

On the one hand, bicameral parliaments are composed of two Houses, each characterized by a well-defined internal political structure and a clear set of functional prerogatives, usually determined by the Constitution (Patterson and Mughan, 1999: 3 ff). The institutional autonomy of each House normally comprises also the administrative autonomy, i.e. the right to self-organize, which encompasses the creation of two autonomous administrative services, one for each House (Díez Picazo, 1985; Pacelli and Giovannetti, 2020). This arrangement aligns with the prevalence of asymmetrical over symmetrical bicameral systems: since asymmetries in the composition and role of the two Houses are the rule in the large majority of bicameral systems (Mughan and Patterson, 1999: 338; Borthwich,

2001), the provision of tailored administrative services in support to each House represents the most obvious answer.

On the other hand, bicameral parliaments often act as a single institution (Trivelli, 1975): this happens not just in the hypothesis of joint sessions but also in the recurring cases of bicameral committees entrusted with the most different tasks. Many spheres of parliamentary activity, including law-making, call for a strong coordination between the two Houses in order to ensure that their work may lead to a common output. In other spheres, including the management of foreign or supranational affairs, bicameral consistency is rather advocated in order to give unity and strength to parliament as a single institution in its interaction with third actors (Griglio, 2020: 133 ff). In response to these requirements, joint administrative support might turn out to be the best answer. As a matter of fact, the presence of single or closely integrated administrative structures serving both Houses may be the easiest way to compose the lines of activity and interests of two autonomous pluralistic institutions which are often asked to act with one single voice. In addition to these arguments, a practical remark would confirm that in symmetrical bicameral systems the two Houses have corresponding legislative and non-legislative prerogatives. Consequently, not just the *technical* functions (consisting in the management of organizational and purely administrative tasks) but also the *procedural* and *substantive* functions (that, respectively, deal with orienting decision-makers in the choices between existing alternatives and supporting MPs with information, knowledge, and expertise) could be easily served by unified administrative structures.

The search for a balance between the precondition of each chamber's autonomy and the call for bicameral synergies has spurred different administrative answers from bicameral parliaments. In a broad perspective, three main formats can be identified: divided, polylith, and joint administrations.

Divided administrations, composed of two autonomous administrative structures, one for each House, identify the basic format. This administrative solution perfectly mirrors the institutional autonomy attributed to each of the two Houses, but can coexist with forms of bicameral coordination among the two administrative services without giving origins to the creation of joint structures.

In some parliaments, the presence of two unicameral administrative services is integrated with the creation of a joint administrative service supporting different areas of shared needs and interests. *Polylith* administrations that follow this model can be considered an evolution from the basic format insofar the creation of the "third" administrative branch often turns out to be a more recent development, adopted in response to new challenges. A further variation lies in the multiplication of the joint administrative services, which may be created to satisfy different shared tasks of the two Houses beyond the ones served by the unicameral services. This format may be used to include the experience of Congress-type assemblies also, which are served by several groups of staff, however not structured as a real bureaucratic "service" (Peters, 2022).

Polylith administrations find their antithesis and at the same time their apogee in the format of *joint* administrations, characterized by the presence of a single administrative service supporting both Houses. This format maximizes shared structures incorporating them in a single bureaucracy.

These models revolve around two opposed dominant logics. *Administrative separateness*, which is at its maximum in divided administrations, offers the advantage of simplicity in the organization of the administrative services, tailored according to the asymmetric prerogatives of the two Houses, thus providing full coherence between the political and administrative autonomy and governance. However, it has a contraindication in the duplication of

administrative structures and lines of activity between the two Houses which risk stimulating competing attitudes between the two Houses. By contrast, *administrative integration* is the dominant logic behind joint administrations and it finds in the burden/cost sharing and in the protection of parliament's unity and cohesion its inner ratio. Whereas this logic emphasizes the coordination interests and potential synergies between the two Houses, it has its side-backs in the complexity of the internal organization and governance and in the difficulties in managing the conflicting interests of the two Houses.

Previous research, focused on the comparison of parliamentary administrations in bicameral systems of Europe, demonstrates that the choice between these two logics, and hence between the two opposite formats of divided or joint administrations, is independent from the nature and type of the bicameral system (Griglio and Lupo, 2021). However, the presence of institutional asymmetries or symmetries might influence what can be defined the internal micro-organization of parliamentary administrations.[4]

Based on these preliminary observations, the following sections examine the main types of bicameral parliamentary administrations. Going beyond the European experience, this provides a global perspective, based also on the insights gained from the relevant cases discussed in this Handbook (see Table 4.1). The enlarged set of benchmarks, including also presidential systems and different parliamentary traditions, offers the opportunity to add further insights to our understanding of the administrative arrangements of parliaments and their relationship with the institutional features of bicameral systems.

4.3 Divided Parliamentary Administrations

4.3.1 Duplication or Adaptation to the House specificities?

Divided administration is the preferred format in bicameral parliaments. This is the easiest and the most obvious solution, given the constitutional and political autonomy that each parliamentary assembly – lower and upper Houses in bicameral systems – enjoys (Le Divellec, 2020). Simplicity in the organization of the administrative services and full coherence between the political and administrative governance are two clear advantages of this format. Since the interests of the two Houses may differ or even come into conflict, two entirely separate administrations would seem to offer the ideal answer to the requirement of providing full and equal protection to such interests.

The other side of the coin of such an arrangement, however, is the duplication of administrative structures and lines of activity in both Houses, which may bring about some disadvantages. In parliaments falling under this category, the two administrative services created to support the Houses of Parliament act as two separate and fully independent organizations, relying on an autonomous governance and on distinct internal rules, often based in the Rules of procedure (Inter-Parliamentary Union, 2020). In most cases (Brazil, Czech Republic, France, Italy, Poland, Romania), the administrative autonomy and independence results in the creation of two parallel structures which are rather similar in the internal organization and services provided.

From an organizational point of view, the administrative hierarchy is perfectly duplicated in both Houses, each run by a distinct Secretary General, usually linked to the respective Speaker/President.[5] Both administrations follow a rather similar division in macro-level (e.g. areas, departments, directions) and micro-level units (e.g. divisions, offices, units). Existing differences in the denominations used to identify corresponding units in the two administrative branches may often be considered cosmetic rather than substantial (Kaniok, 2023).

Table 4.1 Overview of administrative arrangements in bicameral parliaments

Bicameral parliament	Joint administrations (one administrative service for both Houses)	Divided administrations (two administrative services, one for each House)	Polylith administrations (three administrative services: one for each House + a joint service)	Polylith administrations (multiple administrative services/staffing)
Argentina				Five parliamentary services: one for the lower House, one for the upper House and three (Library, Print and Health Insurance System) shared by the two Houses.
Australia			The Federal Parliament's administrative structure comprises three Departments: the Department of the House of Representatives (DHR), the Department of the Senate (DOS) and the Department of Parliamentary Services (DPS), created in 2004 and serving both Houses, which derives from the merging in a single Department of the Department of the Parliamentary Reporting Staff (DPRS), the Department of the Parliamentary Library (DPL) and the Joint House Committee.	
Austria	Since 1945, both parliamentary chambers are served by a joint, deeply integrated parliamentary administration in which the President of the National Council has a dominating role.			
Belgium		The lower and the upper Houses have two distinct parliamentary administrations. However, they share the department of the Library of Parliament. Moreover, they are exploring forms of bicameral cooperation in certain fields (joint security, joint catering).		

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Table 4.1 Overview of administrative arrangements in bicameral parliaments *(Continued)*

Bicameral parliament	Joint administrations (one administrative service for both Houses)	Divided administrations (two administrative services, one for each House)	Polylith administrations (three administrative services; one for each House + a joint service)	Polylith administrations (multiple administrative services/staffing)
Bosnia Herzegovina			Three administrative pillars: one for the lower House, one for the upper House and the Joint Service supporting both Houses for general technical tasks.	
Brazil		The administrative services of the two Houses are separate and function independently but are quite similar in their organization and the services they provide. Although independent from each other, the Chamber and Senate administrations have in common some of the services rendered to the members of parliament, especially regarding matters that are considered in mixed committees or deliberated in joint sessions of the National Congress, such as budget laws and presidential vetoes. Also some of the electronic systems for legislative monitoring have been integrated.		
Canada			The two Houses operate as highly separate organizations with their own administrative services. Only the third organization, the Library of Parliament, acts a joint structure.	

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Table 4.1 Overview of administrative arrangements in bicameral parliaments *(Continued)*

Bicameral parliament	Joint administrations (one administrative service for both Houses)	Divided administrations (two administrative services, one for each House)	Polylith administrations (three administrative services: one for each House + a joint service)	Polylith administrations (multiple administrative services/staffing)
Czech Republic		The two chambers work independently, they have their own administration and internal rules governing it. Both administrations operate on the basis of very similar structures. They are both using almost identical departments. Two services – the Parliamentary Institute, tasked with a scientific, informative and educational mission, and the Library – are formally part of the lower chamber administration but serve the Senate as well.		
France		Each House has its own administration, with a bicephalic structure, divided into an administrative service and a legislative one.		
Germany		Both the *Bundestag* (lower House) and the *Bundesrat* (upper House) have their own administration. By comparison, the administration of the *Bundesrat* is much smaller. The administrations of the two Houses do not form a network as such. However, they cooperate closely on specific issues.		
Ireland	The Houses of the Oireachtas Service (the Service) is the joint administration that provides advice and support services to the Houses of the Oireachtas Commission, to the Houses of the Oireachtas and their Committees and to the Members of the Houses.			

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Table 4.1 Overview of administrative arrangements in bicameral parliaments *(Continued)*

Bicameral parliament	Joint administrations (one administrative service for both Houses)	Divided administrations (two administrative services, one for each House)	Polylith administrations (three administrative services; one for each House + a joint service)	Polylith administrations (multiple administrative services/staffing)
Italy		Each House has its own administration. The same services and units are duplicated in each bureaucratic structure. In 2017, the two parliamentary administrations were formally merged, but this process has not led to structural consequences so far and bicameral coordination between the two bureaucracies continues in an informal manner.		
Mexico		Parliamentary administration in Mexico consists in each House of a secretariat and of the specialized units of the parliamentary civil service. Secretariats constitute the main part of the parliamentary administration in both the Chamber of Deputies and the Senate. The parliamentary civil service increasingly plays a significant role in the administration of both chambers.		
Netherlands		Both chambers have laid down the organizational structure of their administration in their respective rules of procedure. Both administrations are headed by a Secretary General. The organizational structure of the administration in the House of Representatives is considerably more complex than in the Senate.		

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Table 4.1 Overview of administrative arrangements in bicameral parliaments *(Continued)*

Bicameral parliament	Joint administrations (one administrative service for both Houses)	Divided administrations (two administrative services, one for each House)	Polylith administrations (three administrative services: one for each House + a joint service)	Polylith administrations (multiple administrative services/staffing)
Poland		Each Chamber has separate administrative bodies in the form of the Chancellery of the Sejm and the Chancellery of the Senate. Chancelleries have a similar organizational structure, including the names of the units, the legal basis of their operations and the functions they perform.		
Romania		According to the article 64 of the Romanian Constitution, the organization of the two chambers is regulated by their own Standing Orders. Each House has its own parliamentary administration, run by a Secretary General, who is the representative of the chamber, managing the functional activity of the Assembly.		
Spain	The Spanish bicameral parliament has a formally joint administration which nonetheless finds a differentiated governance and special arrangements in the two Houses. Unicameral specificities sometimes seem to overcome the joint nature of the parliamentary bureaucracy.			

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Table 4.1 Overview of administrative arrangements in bicameral parliaments *(Continued)*

Bicameral parliament	*Joint administrations (one administrative service for both Houses)*	*Divided administrations (two administrative services, one for each House)*	*Polylith administrations (three administrative services: one for each House + a joint service)*	*Polylith administrations (multiple administrative services/staffing)*
South Africa	The Parliament and Provincial Legislatures' Service provide the administrative services both to the national Parliament of South Africa and to the nine Provincial Legislatures (South African Legislative Sector – SALS), with an autonomous administrative staff apart from the public service.			
Switzerland	Switzerland has the most tightly integrated administrative organization: both Houses of Parliament occupy the same building and have a single administration. With the exception of a few functions directly related to the plenary sessions, all staff members work for the two chambers.			
UK				Each House has its own staff and a relatively similar set of administrative arrangements (the *governance of administration* – the political control and oversight of administration – and then *staff organization, roles and functions*). Following the passing of the Parliament (Joint Departments) Act 2007 and the move towards unifying some cross-Parliament services, five Joint Departments are now serving both Houses: Parliamentary Digital Service, Parliamentary Security Department, In-House Services and Estates, Parliamentary Archives, Parliamentary Procurement and Commercial Services.

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Table 4.1 Overview of administrative arrangements in bicameral parliaments *(Continued)*

Bicameral parliament	Joint administrations (one administrative service for both Houses)	Divided administrations (two administrative services, one for each House)	Polylith administrations (three administrative services: one for each House + a joint service)	Polylith administrations (multiple administrative services/staffing)
US				There are five major groups of staff serving Congress. The largest group are personal staffs of each Congressman and Senator. Then there are staffs for the committees in each house, as well as for several joint committees. The third group are the staffs for the leadership of the two houses, for example the majority and minority leaders and whips. The fourth group are the various officers of each house, for example parliamentarians, doorkeepers, clerks. Some of these posts are more ceremonial than functional, but they are still part of the Congressional staff. The final group of staff are the employees of the three major support agencies that provide research and analysis to Congress.
	5	10	3	3

From the point of view of the services provided, each House tends to create similar expert structures supporting either the functions of committee and plenary meetings or the highly specialized lines of activity, including IT, EU affairs or budget. The working style in the two Houses may also be rather similar, following shared principles, usually derived by a common (national) administrative tradition and by the existence of similar appointing procedures, status and institutional duties for the staff serving the two administrations.

However, the duplication of administrative services may coexist with relevant differences in their internal arrangement. The first and most obvious of these lies in the divergent size of staff serving lower and upper Houses, which in the large majority of cases follows the asymmetries in the number of MPs allocated to the two branches of Parliament. One extreme case here is Germany: the sizeable administration of the German lower House, the Bundestag, comprising approximately 3,000 members of staff, mirrors the size of this assembly, one of the largest in the EU, currently comprising 736 MPs following the 2021 elections. Conversely, the administration of the upper House, the *Bundesrat*, is composed of little more than 200 employees, serving an assembly of 69 representatives. This confirms the lack of any automatism in the ratio between the number of MPs and the size of the administration, with the lower House having a composition ten times bigger than that of the upper House (Högenauer, Arndt and Koggel, 2023). In a minority of cases, however, the staff numbers appear to be independent from the number of MPs allocated to each House – the experience of Argentina's Parliament is a case in point.[6]

It might be asked whether existing asymmetries in the dimension of the two administrations depend not just on the number of MPs allocated to the lower and upper House but also on existing asymmetries in their functions. Broadly speaking, there is no clear evidence in support to this perspective of inquiry. However, a counter-argument can be found in the rather unique case of the symmetric bicameral system of Italy which involves two parliamentary administrations that perfectly mirror each other in the internal organization (Griglio and Lupo, 2021; Lupo and Gianniti, 2023).

Some observations about the administrative impact exercised by functional or structural asymmetries arise from the comparison of the organizational charts of administrative services in lower and upper Houses (appearing in the chapters of this Handbook). In terms of macro-structures and micro-units activated, these charts show different levels of organizational complexity between the two Houses: upper Houses' administrations are not only composed of fewer units of staff but they also display a more basic structure, corresponding to fewer macro-structures and micro-units (e.g. France, see Tacea, 2023).

It is difficult to assess whether the asymmetries in the organizational charts do correspond to the functional and structural asymmetries between the two Houses. For instance, upper Houses' administrative units involved in the legislative services are usually more limited in size, scope and work pressure compared to lower Houses (Groen, 2023). This mirrors the fact that upper Houses usually have more narrow prerogatives and limited involvement in the decision-making. But there are also relevant examples of plenary or committee secretariats endowed with key tasks in facilitating and orienting the participation of upper Houses in law-making. An example can be drawn from the German *Bundesrat*, where committee secretariats play a pivotal role in drafting and channelling amendments, discussing them with state ministries and developing close contacts with relevant federal ministries and committees of the *Bundestag*. This proactive role can be considered a sort of administrative adaptation to the requirements of an atypical parliamentary assembly, composed not of elected members but of representatives of state governments, who – due to their executive responsibilities – tend to rely intensely

on the *Bundesrat* administration as a sort of connecting belt and agreement facilitator (Högenauer, Arndt and Koggel, 2023).

Another relevant observation here concerns research services. With the important exception of the German *Bundesrat* – which is lacking a research service because it actually does not need one (since its members can rely on their state administrations for background research, advice and analytical support normally covered by research services – Högenauer, Arndt and Koggel, 2023) – these are usually set in upper Houses also. The latter may sometimes be encouraged to reinforce research units focused on core institutional activities and supported by an external visibility as a means of compensating for the weaknesses of their constitutional prerogatives. A significant example is provided by the creation in the Belgian Senate, in 2019, of the Center of Expertise for Institutional Affairs, tasked with collecting, developing and disseminating knowledge in institutional matters (art. 87.1 and 87.2 of the Senate Rules of Procedure). The creation of this new body follows the 2014 constitutional reform of the Belgian bicameralism (Sixth State Reform), which significantly revised the role of the upper House (Dandoy et al., 2015).

4.3.2 *The Search for Administrative Synergies*

Whereas existing asymmetries between the two Houses may give rise to divergencies in their administrative arrangement, administrative synergies might nonetheless facilitate cooperation on joint tasks or common needs of the two branches of Parliament. The search for such administrative synergies involves the provision of forms of cooperation and the pooling of resources and expertise between the two Houses without bringing about the establishment of a joint bureaucratic structure. Three areas of activity – respectively, related to the procedural, technical and substantive functions – can lead to the activation of such administrative synergies.

First, *procedurally*, all the structures or procedures underpinning both Houses, including meetings of the parliament in joint session and bicameral committees, are managed by means of a functional cooperation between the two bureaucracies (Högenauer, Arndt and Koggel, 2023; Lupo and Gianniti, 2023; Santos and Saboia, 2023). This is usually developed through the juxtaposition or rotation of each chamber's administrative inputs. Moreover, each chamber's administrative services normally cooperate in support of the legislative activities carried out independently by each of the two Houses. They do so by providing the timely exchange of documents and parliamentary acts. This comprises for example mutual access to documentation and information systems (Högenauer, Arndt and Koggel, 2023).

Second, administrative synergies between the two Houses may be activated for those *technical* functions that, due to economies of scale, are better served by pooling resources and that correspond to symmetrical needs of the two branches of parliament. One most relevant example is that of Belgium, where the administrative services of the two Houses are fully autonomous, but interestingly share the same building. In the last few years, relevant efforts have been made by the two administrations in order to pool forces and explore enhanced cooperation in selected *technical* fields, including joint security detail and joint catering operation (Popelier and Caboor, 2023). This trend can be interpreted as an administrative response to the sequence of constitutional reforms which have strengthened the asymmetric nature of the Belgian bicameral system, significantly limiting the prerogatives of the upper House, the Senate.

Not too dissimilar efforts have been shaping latest trends in the Italian parliamentary administrations. In 2017, the two parliamentary administrations were formally merged in

response to a tempted, but failed, constitutional reform of the symmetric bicameral system. Rules on the creation of joint administrative services (from medical assistance to joint procurement) were introduced and these are still in force, although they remain formally unexecuted (Lupo and Gianniti, 2023). Digital arrangements, eventually leading to the integration of electronic systems for legislative monitoring electronic voting (e.g. Brazil: Santos and Saboia, 2023), is another field open to instances of bicameral administrative cooperation.

Third, the carrying out of *substantive* functions may occasionally see the establishment of forms of administrative cooperation between the two services. This is true particularly for Parliamentary Libraries, which even in divided administrations may lead to the creation of a joint department (e.g. Belgium: Popelier and Caboor, 2023), to the sharing of a department that, formally placed in the lower House's administration, serves the upper House as well (e.g. Czechia: Kaniok, 2023) or to the unification of the Libraries serving the two Houses (e.g. Italy: Lupo and Gianniti, 2023).

Not too dissimilar solutions have been activated for research services: this happens in the Czech Parliament, where the Parliamentary Institute formally belonging to the lower House also supports the Senate, and in Italy, where the administrative cooperation between the research services of the two Houses has now led to the release of joint dossiers of legislative bills that are always scrutinized independently by each House (Griglio and Lupo, 2021; Lupo and Gianniti, 2023).

On the whole, this overview demonstrates that, over time, divided administrations have come to adapt to the constitutional features of their respective bicameral system. While we can observe that in many cases bicameral symmetries and asymmetries do influence the internal organization and functioning of administrative services, no automatism can be drawn from these experiences. Administrative answers to the institutional inputs of a bicameral system are uneven and often unpredictable, especially when seen from outside. Ultimately, the shape of an administrative design is the outcome of a complex combination of structural and functional features, which are related both to the overall role of parliament in the constitutional design and to the established practice of internal organizational and procedural arrangements that support its activity (Lupo, 2019).

4.4 Joint Services in Polylith Administrations

In some bicameral parliaments, we see the presence of three or more administrative services: beyond the two general services supporting the lower and the upper House, other focused or sectorial services have been created to jointly manage common requirements or fields of shared activity.

Among those discussed here, five parliaments follow this format. Beyond the two services set for the lower House and the upper House, the Parliaments of Australia, Bosnia and Canada possess an additional joint administrative service. In the case of Argentina, the two Houses share three and in the UK even five different services.

Such joint services may fulfil different shared needs and manage multiple areas of activity. The comparative analysis shows two main sets of goals. The first set of goals deals with a *substantive* function, namely a common need faced by both Houses to rely on documentation, research evidence and reporting in order to increase the robustness of their decision-making (Rose et al., 2020). Following this logic, the Library of Parliament is in three cases − Canada, Argentina and Australia − devised as a joint service. In Australia, the joint department established in 2004, named the Department of the Parliamentary Reporting Staff (DPRS), does not only serve the joint Parliamentary Library but also covers the DPRS and the Joint

House Committee. This demonstrates the merging in a joint structure of different administrative units which are meant to cover all the reporting and documentation needs of parliamentarians and at the same time to support the activity of the Joint House Committee. Equally, the creation of the Parliamentary Archives in UK as a joint service derived from the House of Lords Records Office may be linked to the perceived need of a shared records management of the UK Parliament in order to collect, preserve and make archives accessible in an easy and simplified way.

The second set of goals attaches to the presence of joint services the management of *technical* functions (i.e. dealing with security, procurement or IT) which, for economies of scale, are better fulfilled by pooling resources of the two Houses. Bosnia has a Joint Service which supports both Houses in the conduct of general technical tasks. Argentina has two joint parliamentary services, respectively, for Print and Health Insurance System. UK has four Joint Departments, established in 2007,[7] all performing technical tasks: Parliamentary Digital Service, Parliamentary Security Department, In-House Services and Estates, Parliamentary Procurement and Commercial Services. Many of such services have been created in the last few decades in response to a common challenge to realign the administrative organization to the call for bicameral synergies in some core functions.

However, it is remarkable that joint services have *not* been set in those parliamentary administrations following the polylith model to support *procedural* functions. Such functions would clearly appear to call for a strong coordination between the two Houses in areas such as budgetary matters, foreign affairs or European integration. An explanation for this can be found in the strong political salience of these spheres of activity: in the exercise of these functions, the political will drives each House to keep full control over the substance, dominating the administrative handling of such matters and therefore avoiding the creation of a joint structure that might challenge the level of internal autonomy.

In conclusion, it can be argued that the creation of joint services, in addition to separate administrations of each House, is more likely in areas with a strong administrative and technical component. By contrast, it remains low when the procedural or substantive implications of such functions risk to interfere with the political sphere.

4.5 Joint Parliamentary Administrations

4.5.1 *What Moves the Option for a Joint Bicameral Administration?*

Joint administrations can be considered a minority format in the context of bicameral parliaments: only five cases covered in this Handbook fall under this type. Four of these are in Europe (Austria, Ireland, Spain and Switzerland) and one in Africa (South Africa). When investigating the reasons why two Houses might decide to pool their administrative resources and establish a joint administrative service, three elements need to be taken into consideration.

First, there is the historical process of the creation of joint parliamentary administrations as a means to reinforce parliamentary independence vis-à-vis the executive. Considering the search for balance between parliament and government, it is evident that setting up a single administration – or two administrations that are tightly coordinated – can be expected to strengthen the role both Houses can play; conversely, two independent administrative services would mutually check each other and weaken the overall position of the parliament in the institutional system. This is evident regarding the origins of certain joint parliamentary administrations. In Switzerland, for instance, the creation of the *Services du Parlement* is the result of a historic evolution that led the parliamentary administration to gain autonomy

and independence from the Federal Chancellery. Initially, it had been the Federal executive that, in the 19th century and for large part of the 20th century (until 1972), had provided the Secretariat of the National Council and of the Council of States. The autonomy and unity of the *Services du Parlement* was only fully recognized by the new Constitution adopted in 1999 (art. 155).

Austria is an example of one of the most integrated parliamentary administrations and its rules have been outlined by Article 30.3 of the Constitution adopted in 1921, when parliament as an institution was defined in its fundamental organization and tasks. The administration is strongly grounded in the bicameral architecture of Parliament, as a single institution. It is remarkable to note that the Austrian Constitution formally recognizes as State organs the National and the Federal Councils, but not the bicameral legislature, and refers to the notion of the federal 'Parliament' only to identify the scope and the functions of the parliamentary administration.

In Spain, the unitary nature of the parliamentary bureaucracy – based on the statute of personnel, which is regulated 'by common agreement' between the two Houses (Díez Picazo, 1985; García-Escudero Márquez, 1998) – was recognized by art. 72 of the 1978 Constitution, which identified in the Parliament one of the fundamental democratic safeguards after years of dictatorship.

In South Africa, the creation of a joint bureaucracy is strongly rooted in the strengthening of the legislative institution as a means to reinforce constitutional democracy. The staff of Parliament was initially set up in 1974, outside of the Civil Service, as a single special bureaucracy serving both Houses.[8] This was part of the process of parliamentary institutionalization which further continued in 1996, when the staff of Parliament, named 'Parliamentary Services Administration', was referred to the South African Legislative Sector, the Parliament consisting of the two Houses (the National Assembly and the National Council of Provinces), as well as the nine Provincial Legislatures established by the Republic of South Africa (RSA) Constitution Act, No 108 of 1996 (Layman, 2023).

Finally, historical causes seem to have inspired also the establishment in Ireland, in 1959, of the joint staff of the Houses of the Oireachtas. The purpose of this reform was to make civil servants of the two Houses independent from the government.[9] This historical change can be connected to the autonomization of the Irish executive branch set by the Republic of Ireland Act 1948, which came into operation on 18 April 1949. As a matter of fact, the Act, severing the last ties with the British Monarchy, can be considered the birthday of a fully independent Irish executive power, which clearly activated some counter-measures on the side of Parliament.

Apart from such historical circumstances, a second element which can explain the option to create a joint parliamentary administration in bicameral systems lies in the search for unity and coherence of parliamentary action in the context of highly pluralistic and composite environments. A single administration following all the decision-making processes in the two Houses is likely to provide more unitarian results compared to the more fragmented and sectorial outcomes which could be expected when two distinct parliamentary administrations assist the two Houses.

This is evident from the fact that in three out of five cases (Austria, Switzerland and South Africa[10]) the upper House represents the sub-national entities of a Federal State. In South Africa, as discussed above, the Parliamentary Services Administration is exceptionally advising not just the national Houses but also the provincial legislatures, thus confirming the strong emphasis towards the unitary nature of the main representative assemblies. The willingness to develop such a system of 'cooperative governance' (Layman, 2023) takes into

account the autonomy of legislatures in determining their own internal arrangements but at the same time strengthens the intrinsic nature of South Africa as 'a unitary state with federal features' (ibidem). This was later confirmed by the Memorandum of Understanding signed by all Speakers of Parliament and Provincial Legislatures in March 2010, which outlined the commitment of the institutions to collaborate and cooperate on matters of common interest based on their similar constitutional mandates. Probably, a best practice on how to accommodate and adapt political representation in multi-level settings.

Finally, a third possible explanation for the creation of joint services is the search for greater autonomy: having regard to the point of balance between politics and administration, the choice in favour of a single administration in a bicameral system – which is by definition composed of two Houses presided over by two distinct Speakers/Presidents – potentially gives the administration a higher degree of autonomy from the directions determined by politics and by MPs leadership bodies. Although, as discussed below, in joint services the administrative governance is not always equally distributed among the Speakers/Bureaux of both Houses, it can nonetheless be argued that parliamentary staff serving two Houses have a broader mission and a greater degree of administrative autonomy with regard to the political preferences of the elected members.

4.5.2 A Single Format, with Rather Different Levels of Administrative Integration

The format of joint parliamentary administrations offers a wide range of internal options ranging from the more cohesive arrangements, with only limited lines of separation between the two Houses, to a more divided approach, where a single bureaucracy splits into two administrative structures which are rather autonomous from one another. The determinants of these internal arrangements may be found both in the macro-level and the micro-level of the organization. On the one hand, they deal with the appointment and role of the Secretary General and the status of personnel. On the other hand, they relate to the scope and nature of unicameral administrative arrangements.

Having regard to both of these levels of analysis, the Swiss and Austrian administrations are examples of a deeply unified bureaucracy, with a high level of internal integration. In both countries, a single Secretary General serves the two Houses (even three in Switzerland, including also the Federal Assembly composed of the two Houses in joint session) and the staff of the joint administration has a common status modelled on the conditions set for federal employees. What differs in the two administrations is the governance of these aspects, and in particular the appointment of the Secretary General and the recruitment of staff: in Switzerland, they are based on bicameral procedures,[11] while in Austria they rest with the President of the National Council, the lower House.[12]

In the internal arrangement, the Austrian parliamentary administration provides joint structures for the large majority of internal tasks. Probably due to the strongly asymmetrical nature of the Austrian bicameral system, some unicameral administrative units, working at the level of each House, have been created in the legislative field to support the core advice and support services of the *Nationalrat* and the *Bundesrat*. However, the tasks and activities which are instrumental, but not inherent, to law-making (the legal, legislative and research services, the EU affairs services, the information and public relations services, the stenographic records, the archives and statistics) are supported by joint services. The degree of internal integration is even more extensive in the Swiss parliamentary administration, where, with the exception of a few functions directly related to the plenary sessions, all the

other tasks are served by joint structures and all staff members work jointly and equally for the organs of both chambers.

Compared to the Swiss and Austrian cases, South Africa and Ireland can be considered examples of joint administrations with an intermediate degree of integration. The Parliamentary Services Administration of South Africa combines a strong coordination with some internal divisions between the two Houses. Alongside the Secretary to Parliament, the leading position introduced by the Parliamentary Service Act 1974 (§18) that must enjoy the confidence of the Speakers of both Houses, two distinct Secretaries, one for the National Assembly and the other for the National Council of Provinces, have been re-established. These cover the basic procedural and logistic advice and guidance to plenary and Committee sessions and liaison offices with national and sub-national governments. All the other functions (legal, research and advisory, external relations, corporate services) are jointly administered in support of both Houses. Interestingly, a separate joint program within the administration of Parliament – the Legislative Sector Support – was created in 2006 as part of the Legislature Support Programme funded by the European Union. Its task is to enhance the coordination of the whole legislative sector, supporting the aggregate bodies of the Speakers' Forum of South Africa and the Secretaries' Association of the Legislatures of South Africa.

Elements of integration and autonomy are also present in the internal arrangement of the Irish 'Houses of the Oireachtas Service' (Coughlan and Gunn, 2011; McKenna, 2011). Both Houses have their own clerk, but the clerk of the lower House, the Dáil, acts as the Secretary General of the administration, with a power of direction and control over all the officers and joint staff, subject to the orders received from the Speaker of the Dáil (art. 149 of the Standing Orders of the Dáil – art. 15 and 16 of the Houses of the Oireachtas Commission Act). The Secretary General is appointed by a bicameral body, the Houses of the Oireachtas Commission,[13] on a recommendation made by the Speaker of the Dáil (Houses of the Oireachtas [appointments to certain offices] Act 2015). However, the upper House, the Seanad, which in the last century has faced several attempts at reform even including a failed referendum on its abolition in October 2013, has a dedicated Seanad Office, dependent upon the Secretary General, providing advice and support services to its sittings and business.

Finally, Spain offers an example of the least integrated among joint parliamentary administrations. In its internal governance, notwithstanding its formal unity, it is intrinsically divided. Each House has its own head official, the *Secretario General* for the Congress and the *Letrado Mayor* for the Senate, appointed by the House Bureau, following the Speaker's proposal. The civil servants of the *Cortes Generales* have a composite status – partially based in joint *Estatuto del Personal de las Cortes Generales,* approved by the Bureau of the Congress and of the Senate on 23 June 1983, as integrated by each House (Gómez, 2002; Lozano Miralles, 2005) – that nevertheless does not hinder mobility between the two branches. In the internal organization, the Spanish Parliament features extensive unicameral administrative arrangements, covering most of the legislative and non-legislative offices, exception made for few joint administrative structures (responsible for the activity of the *Cortes Generales* and for the Technical Secretary of the Central Electoral Committee).

On the whole, multiple factors influence the internal degree of integration and cohesion of a joint parliamentary administration. Some major determinants can be identified in the symmetries and asymmetries of the bicameral system and in the *influence effectiveness*[14] of the lower and of the upper House. For instance, when the two Houses exercise similar constitutional functions, as in Switzerland, staff resources and expertise can be pooled easily and in an effective manner. Similarly, when the two Houses have a comparable institutional strength, as in Switzerland and South Africa, this favours the joint governance of the administration.

By contrast, in asymmetrical bicameral systems (such as Austria, Ireland and Spain), certain administrative units – related, for instance, to the exercise of core legislative tasks, to the knowledge and interpretation of the Rules of procedure, to the management of relationships with MPs – are working at the level of each House. When in asymmetrical bicameralism upper Houses are extremely weak in terms of status and prerogatives, it is the lower House that prevails in the provision of administrative governance. This happens in Austria and Ireland- but not in Spain- due to the intrinsically divided structure of the parliamentary administration.

4.6 Conclusions

The comparative analysis demonstrates the difficulty to find any underlying and universal rule behind the administrative arrangement of bicameral parliaments. The institutional complexity arising from the presence of two Houses is mirrored and indeed multiplied at the administrative level. A wide range of solutions, either shaped in terms of separateness and differentiation or supporting the call for administrative synergies and forms of integration, can be identified.

Even if there is no one-size-fits-all explanation for the mix between these two opposite requirements, we have observed that the way in which each parliament shapes its administrative organization is based on clear institutional preferences, with regard both to the basic choice between a divided or a joint administrative format and to the subsequent adjustments in the internal micro-organization. In most cases, the administrative format is defined alongside the historical process of parliamentary institutionalization (Polsby, 1968). The need to promote and strengthen parliamentary pluralism and enhance the autonomy entrusted on each House or, to the contrary, to sustain the unity of the parliamentary institution vis-à-vis the executive might be dominant reasons behind the choice for either a divided or a joint format.

Within each format, the decision on which structures and spheres of administrative activity are better served at the level of each House and which others instead require bicameral solutions depend on clear determinants: surprisingly, these determinants tend to be rather similar for the divided and the joint formats. On the one hand, divided administrations may prefer to address the needs for administrative synergy in different ways, ranging from informal coordination to the creation of joint services and the shift towards a polylith format. Calls for synergy mostly feature in those technical and specialized areas where economies of scale are particularly relevant or regard those *substantive* functions with a strong administrative component where interference from the political sphere tends to be low. On the other hand, joint administrations may decide to create divided units to support the specific requirements and needs of lower and upper Houses, up to the re-creation of strong lines of administrative division between the two branches of parliament. These arrangements can specifically cover the *procedural* or *substantive* functions that correspond to strong asymmetries in the institutional architecture of the bicameral system. These are fields of activity with a strong political dimension and sensitivity where the role of the administration is usually limited to the provision of support services (that are nonetheless crucial to the continuity of the institution's work).

This overview confirms that divided administrations, which find in *administrative separateness* their dominant logic, tend to compensate this structural choice with the development of forms of bicameral informal coordination up to the creation of joint services in support for shared functions, common needs or highly technical and knowledge-based requirements associated to economies of scale. By contrast, joint administrations, based on *administrative*

integration, complement this dominant logic with the establishment of divided units to support the specific administrative necessities of lower and upper Houses, up to the re-creation of strong lines of bureaucratic division between the two branches of parliament in those fields of activity that meet broader institutional asymmetries. These opposed trends witness that the hybridization of the original organizational choice is a rule both in divided and in joint administrations and that, regardless of the referent model, bicameral parliaments rely on a composition of administrative services shared between the two Houses and of other services supporting each House separately. The mix between these two solutions is the outcome of national parliamentary designs evolving over the decades in support to changing institutional needs and choices.

Notes

1 On the difference between 'legislature' and 'parliament', Laver (2008) and Kreppel (2006). In fact, due to the variety of institutional denominations adopted, a certain degree of confusion surrounds the terms 'parliaments', 'legislatures' and 'legislative bodies'; see Fasone (2019).

2 Due to its specificities, the staffing model of the US Congress, which is not structured as a real 'bureaucracy', will not be examined in details in the article, but in Figure 1 it will be mentioned within the format of polylith administrations.

3 It is well known that the Speaker/President represents the only and final point of (political) unity of such a pluralistic and articulated organization, depending on the features of each Parliament and institutional system (Lippolis and Lupo, 2013).

4 On the difference between the macro- and micro-organization of parliamentary administrations, see Griglio and Lupo (2021, note no.1).

5 On the presence of two Secretary Generals for each House in some bicameral experiences, including France, see however Gianniti and Di Cesare (2023).

6 The administrative services supporting the Argentinean lower House (the Chamber of Deputies, composed of 257 representatives) and upper House (the Senate, composed of 72 senators) have the same number of people working as Parliamentary Staff, around 5,000 each.

7 The creation of Joint Departments in the British Houses of Parliament was preceded by the adoption of the Parliament (Join Departments) Act 2007, regulating the sharing of the functions, the staff mobility and all the organizational requirements.

8 The Parliamentary Service Act 1974 gave effect to a resolution of the Senate and of the House of Assembly to merge the administration of their personnel and resources with those of the Joint Parliamentary Establishment, a pre-existing joint administrative service.

9 Pursuant to art. 20 of the staff of the Houses of the Oireachtas Act, 1959, civil servants who are a member of the joint staff of the Houses of the Oireachtas cannot be removed from office by the government except after consultation with the Chairmen of the two Houses.

10 In Spain, the upper House is only formally composed by representatives of the sub-national entities and defined as 'Chamber of territorial representation' by art. 69 Cost., although in the constitutional practice it is acting more as a (weak) political assembly than as a place for the participation of the strong Spanish regions (Santolaya Machetti, 1983; Jimenéz Blanco, 1985; Solozábal Echavarría, 1995).

11 In Switzerland, the Secretary general is appointed by a parliamentary body, called the 'Coordination conference', and is therefore confirmed by the Offices of the two Houses. The recruitment of staff is deliberated through an ordinance of the Federal Assembly (art. 66 *Loi sur le Parlement*).

12 According to art. 30.3–6 of the Constitution and art. 14 of the Federal Law on the Rules of Procedure of the Austrian National Council, the President of the National Council ratifies the appointment of the Secretary General and acts as the supreme administrative organ in the internal organization and in the execution of administrative matters.

13 The Commission, which also acts as the governing body of the Service, is a composed of the Speakers of the two Houses, the Secretary General, a member appointed by the Minister and not more than 7 ordinary members.

14 This notion can be interpreted as an indicator of the amount of influence effectively achieved by parliamentary assemblies in the decision-making process, see Arter, 2006.

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