

*Systems of Government in Some Foreign Countries :
The Overall Comparison Table*

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Table 1 - Composition and Characteristics of the Legislature

Country	Name(s) of House(s)	Normal term of office	Total membership	Membership: a) Elected b) Appointed	Features of electoral and appointment system
<u>FRANCE</u> Population 58.6 million	Senate	9 years	321	All elected.	Indirect election by electoral college.
	National Assembly	5 years	577	All elected.	Direct election by universal suffrage.
<u>UNITED STATES</u> Population 275 million	Senate	6 years	100	All elected.	Direct vote.
	House of Representatives	2 years	435	All elected.	Single member district system.
<u>UNITED KINGDOM</u> Population 59 million	House of Lords	Life	670	548 life peers, 92 hereditary peers, 26 bishops.	Life peers are appointed by the Monarch. Hereditary peers are elected from among themselves.
	House of Commons	5 years	659	All elected.	Single-member constituencies.

Country	Name(s) of House(s)	Normal term of office	Total membership	Membership: a) Elected b) Appointed	Features of electoral and appointment system
<u>JAPAN</u> Population 127 million	House of Councillors	6 years	252	All elected.	100 members are elected from the whole nation, 152 from 47 prefectures (each constituting an electoral district). Each voter casts two votes, one under the proportional representation system, and one for the voter's electoral district.
	House of Representatives	4 years	500	All elected.	300 members from single-seat districts, 200 members by proportional representation.
<u>GERMANY</u> Population 82.04 million	Bundesrat (Federal Council)	No legislative term	69	All appointed.	Appointed by the 16 states governments; terms are not fixed, but dependent on the office of the state governments.
	Bundestag (Federal Parliament)	4 years	669	All elected.	Direct election, with proportional representation system. Each voter casts two votes-- the first for a constituency candidate and the second for a party list. A party has to win at least 5% of the votes cast or three district mandates to be represented proportionally.

(Table 1)

Country	Name(s) of House(s)	Normal term of office	Total membership	Membership: a) Elected b) Appointed	Features of electoral and appointment system
<u>NEW ZEALAND</u> Population 3.8 million	The House of Representatives	3 years	120	All elected.	Mixed Member Proportional Representation (MMP) electoral system. Under MMP, each voter has two votes - one for a member to represent an electorate and the other for a party which the voter prefers. The overall number of candidates of each party elected to Parliament is determined by the national percentage of votes each party obtains (those parties obtaining less than 5% of the votes or failing to win an electorate seat are disregarded).
<u>SINGAPORE</u> Population 3.89 million	Parliament House of Singapore	Elected Member - 5 years Non-Constituency Members - 5 years Nominated Members - 2 years	93	Elected Member - 83. Non-Constituency Members - 3. Nominated Members - Up to 9.	Elected Member--from single-member constituencies and Group Representation Constituencies. Non-Constituency Members-- appointed from among unsuccessful opposition candidates who have had the highest percentage of votes in their respective constituencies. Nominated Members-- appointed by the President on the recommendation of a Special Select Committee of Parliament.

(Table 1)

Table 2 - Dissolution of Parliament

Country and House(s)	Constitutional provisions / conventions for dissolution (expiry of tenure)	Premature dissolution - by whom, when and how
<u>FRANCE</u> Senate National Assembly	Cannot be dissolved. 5 years.	Not applicable. If the Prime Minister and the Government lose their parliamentary support, they must resign and be replaced by another Government. The President of the Republic may, after consulting the Prime Minister and the presidents of the two chambers, declare the National Assembly dissolved.
<u>UNITED STATES</u> Senate House of Representatives	Congress cannot be dissolved.	Not applicable.

Country and House(s)	Constitutional provisions / conventions for dissolution (expiry of tenure)	Premature dissolution - by whom, when and how
<p><u>UNITED KINGDOM</u></p> <p>House of Lords</p> <p>House of Commons</p>	<p>Cannot be dissolved.</p> <p>5 years.</p>	<p>Not applicable.</p> <p>Prime Minister may ask the Monarch to dissolve Parliament and call for elections, usually some time before the 5-year term is up or when the situation appears to favour the majority party.</p>
<p><u>JAPAN</u></p> <p>House of Councillors</p> <p>House of Representatives</p>	<p>Cannot be dissolved.</p> <p>4 years.</p>	<p>Not applicable.</p> <p>Can be dissolved at any time by the Emperor on the advice and with the consent of the Cabinet.</p>
<p><u>GERMANY</u></p> <p>Bundesrat (Federal Council)</p> <p>Bundestag (Federal Parliament)</p>	<p>Cannot be dissolved.</p> <p>4 years.</p>	<p>Not applicable.</p> <p>Federal President may dissolve Federal Parliament if it fails to elect a Federal chancellor after the prescribed number of ballots, or if a Federal government motion of confidence is rejected.</p>

(Table 2)

Country and House(s)	Constitutional provisions / conventions for dissolution (expiry of tenure)	Premature dissolution - by whom, when and how
<u>NEW ZEALAND</u> House of Representatives	Just prior to expiry of 3-year term.	Calling of new elections is at the discretion of the Government.
<u>SINGAPORE</u> Parliament House of Singapore	Just prior to expiry of 5-year term.	Calling of new elections is at the discretion of the Government.

(Table 2)

Table 3 - Role of Parliament in Appointment of the Executive

Country and House(s)	Role of Parliament in appointing the Head of State	Term of office of Head of State	Role of Parliament in appointing the Government	Whether members of Government must be Members of Parliament
<u>FRANCE</u> Senate National Assembly	None	7 years	The Prime Minister is usually chosen on the basis that he can win a majority of the National Assembly.	Members of Government must give up their parliamentary mandate.
<u>UNITED STATES</u> Senate House of Representatives	If none of the three leading Presidential Candidates receives an absolute majority, the House of Representatives elects one of them to be President, each state voting as one entity	4 years	None.	Members of Government cannot simultaneously be members of Congress.
<u>UNITED KINGDOM</u> House of Lords House of Commons	None	Hereditary	The Prime Minister must be Member of Parliament who has the ability to command a majority in the House of Commons.	Cabinet Ministers must be Members of Parliament.

Country and House(s)	Role of Parliament in appointing the Head of State	Term of office of Head of State	Role of Parliament in appointing the Government	Whether members of Government must be Members of Parliament
<p><u>JAPAN</u></p> <p>House of Councillors</p> <p>House of Representatives</p>	<p>Succession to the Imperial Throne shall be in accordance with the Imperial House Law passed by the Diet</p>	<p>Hereditary</p>	<p>The Prime Minister must be a member of the Diet. He is usually the president of the majority party.</p>	<p>At least one half of the Cabinet ministers must be chosen from the Diet.</p>
<p><u>GERMANY</u></p> <p>Bundesrat (Federal Council)</p> <p>Bundestag (Federal Parliament)</p>	<p>The Federal President is elected by the Federal Convention composed of members of Federal Parliament and equal number of members elected by state parliaments</p>	<p>5 years</p>	<p>The Federal Chancellor (Head of Govt) is nominated by the Federal President and elected without debate by the Bundestag. Cabinet Members are appointed by the Federal President on the proposal of the Federal Chancellor.</p>	<p>No, but they usually are.</p>

(Table 3)

Country and House(s)	Role of Parliament in appointing the Head of State	Term of office of Head of State	Role of Parliament in appointing the Government	Whether members of Government must be Members of Parliament
<u>NEW ZEALAND</u> House of Representatives	None. The Head of State is the Queen (or King) of England. The Governor-General is the personal representative of the Head of State	The Governor-General normally holds office for 5 years	No formal role. The Prime Minister is appointed by the Governor-General. Cabinet Members are appointed by the Governor-General on the advice of Prime Minister.	Yes.
<u>SINGAPORE</u> Parliament House of Singapore	No. The President is directly elected by the people	6 years	No formal role. The Prime Minister is appointed by the President. Cabinet Members are appointed by the President on the advice of Prime Minister.	Yes.

(Table 3)

Table 4 - Ministerial Responsibility to Parliament

Country and Houses	Responsibility of Government to Parliament collective or individual	Legal basis of governmental responsibility to Parliament	Procedural devices to ensure executive accountability	Circumstances under which Government must resign
<u>FRANCE</u> Senate National Assembly	Collective	The Constitution	Questions, inquiry commissions, information missions, debates and declarations, vote on resolutions, Ombudsman.	When the National Assembly adopts a motion of censure, or rejects a programme or a declaration of general policy of the Government.
<u>UNITED STATES</u> Senate House of Representatives	No direct responsibility	Legislative Re-organisation Act 1946	Committee inquiries and hearings, formal consultations with and reports from the executive, Senate advice and consent for executive nominations and treaties, House impeachment proceedings and Senate trials.	None.

Country and Houses	Responsibility of Government to Parliament collective or individual	Legal basis of governmental responsibility to Parliament	Procedural devices to ensure executive accountability	Circumstances under which Government must resign
<u>UNITED KINGDOM</u> House of Lords House of Commons	Both collectively and individually responsible to Parliament	By convention	Question time, adjournment, debates, motion debates, debates on motions of no-confidence, select committee system.	If the Government is defeated on an explicit no-confidence motion or a major bill.
<u>JAPAN</u> House of Councillors House of Representatives	Collective	The Constitution	Question time, committees.	When the House of Representatives passes a no-confidence resolution or rejects a confidence resolution.
<u>GERMANY</u> Bundesrat (Federal Council) Bundestag (Federal Parliament)	Both collectively and individually responsible to the Bundestag	The Basic Law	Permanent committee, committee on inquiry debates, interpellations and questions, Parliamentary Commissioner for the Armed Forces.	Passage of a vote of no confidence by the Bundestag. Passage of a constructive vote of confidence leads to removal of the Federal Chancellor.

(Table 4)

Country and Houses	Responsibility of Government to Parliament collective or individual	Legal basis of governmental responsibility to Parliament	Procedural devices to ensure executive accountability	Circumstances under which Government must resign
<u>NEW ZEALAND</u> House of Representatives	Both	Constitutional convention	Question time, debates, select committees, Officers of Parliament such as Ombudsman.	Must resign or hold an election if defeated on a vote of confidence and matter of confidence.
<u>SINGAPORE</u> Parliament House of Singapore	Collective	Constitution (Art. 24) / Constitutional convention	Question time, motions, select committees, Public Accounts Committee, Government Parliamentary Committee.	Defeat on a vote of no confidence or a major bill in the House.

(Table 4)

Table 5 - Initiation of Legislation

Country and House(s)	Right to initiate legislation	Conditions affecting the right to initiate legislation and special requirements to introduce Bills
<u>FRANCE</u> Senate National Assembly	Prime Minister, Deputies and Senators have the right to initiate bills.	Bills/amendments introduced by members of National Assembly shall not be considered if they reduce public financial resources or increase public expenditures. Final decision on bills/amendments proposed by the Senate rests with National Assembly. Government's bills are given priority.
<u>UNITED STATES</u> Senate House of Representatives	Members of Both Houses.	Bills to raise revenue must originate in the House of Representatives.
<u>UNITED KINGDOM</u> House of Lords House of Commons	Members of Parliament have the right to initiate legislation.	A private member's bill may not be introduced if its primary objective is to require additional government expenditure. If such expenditure is necessarily incidental to the main purposes of a bill, a financial resolution moved by government is required.

Country and House(s)	Right to initiate legislation	Conditions affecting the right to initiate legislation and special requirements to introduce Bills
<p><u>JAPAN</u></p> <p>House of Councillors</p> <p>House of Representatives</p>	<p>Prime Minister, Members of both Houses, a standing committee or a special committee.</p>	<p>Members' bills require support of at least 20 members in the House of Representatives or 10 members in the House of Councillors.</p> <p>Members budget amendment bills require support of at least 50 members in the House of Representatives or at least 20 members in the House of Councillors.</p>
<p><u>GERMANY</u></p> <p>Bundesrat (Federal Council)</p> <p>Bundestag (Federal Parliament)</p>	<p>Federal Government, Federal Council as a whole, or at least 5% of members of the Bundestag; individuals members of the Bundestag do not have the right to initiate legislation.</p>	<p>In case of a bill envisaging significant public expenditure (so-called finance bills), the Budget Committee of Bundestag is asked to investigate whether the bill is compatible with the financial condition during the First Reading. The Budget Committee's report is submitted directly to the plenary for the Second Reading. Unless the Budget Committee proposes a recommendation to cover such expenditure, the bill could not be adopted.</p>
<p><u>NEW ZEALAND</u></p> <p>House of Representatives</p>	<p>Bills may be introduced by the government and by members of the Parliament.</p>	<p>MPs may propose legislation requiring expenditure, subject to the government's right to exercise a veto if the legislation would have "more than a minor impact" on the government's general economic policies.</p>

(Table 5)

Country and House(s)	Right to initiate legislation	Conditions affecting the right to initiate legislation and special requirements to introduce Bills
<p><u>SINGAPORE</u> Parliament House of Singapore</p>	<p>Bills may be introduced by the government and by members of the Parliament.</p>	<p>Article 59(2) of the Constitution provides that when provisions of a bill or an amendment are either directly or indirectly for tax collection, require state expenditure involving the Consolidated Fund or are on matters relating to the financial obligations of the Government, the bill may not be introduced unless it is recommended by the President and such recommendation signified by a Minister. However, this does not affect legislation which provides for the imposition or alteration of fines, fees or licensing.</p>

(Table 5)

Table 6 - Regulation of Political Party

Country	Legal Basis	Registration	Party Finance	Public Funding Support
<u>FRANCE</u>	The Constitution and the Electoral Code	Information not available	<p>The Electoral Code restricts the maximum of donations received by each political party to HK\$63,500 per annum per donor, and the maximum of donations to be received by each candidate to HK\$38,100 per donor per election. Any donation higher than HK\$1,270 needs to be made by cheque and be declared.</p> <p>Prohibits receiving donation from trade unions, companies and foreign sources.</p> <p>Statutory ceilings on election expenses.</p> <p>Campaign accounts must be published and submitted to a special government committee.</p>	<p>Tax deductions for donations, with a ceiling set at HK\$63,500 per political party per annum, and HK\$38,100 per candidate per election.</p> <p>Certain media time is provided free for parliamentary groups.</p> <p>Certain election expenses are reimbursed to political parties which won at least 5% of total votes cast.</p>

Country	Legal Basis	Registration	Party Finance	Public Funding Support
<u>UNITED STATES</u>	Nil	Nil	The Federal Election Campaign Act 1974 specifies the contribution limits for election campaigns and has established a matching fund system for Presidential election.	If a candidate for federal office complies with the voluntary spending limit set by the Federal Elections Commission, he is entitled and receive public funds under the Matching Fund System.
<u>UNITED KINGDOM</u>	Registration of Political Parties Act 1998 which will be replaced soon by the Political Parties, Elections and Referendums Bill. The latter has been passed by Parliament already and awaiting Royal Assent	Registration with the Companies House under the Registration of Political Parties Act 1998. Registration of party names and emblems is not compulsory However, under the Political Parties, Elections and Referendums Bill, party registration is mandatory	Under the Political Parties Elections and Referendums Bill, parties will be required to maintain accounts of income and expenditure, and to submit annual statement of accounts to the Electoral Commission. There will be prohibitions on foreign and anonymous donations. Ceilings will be imposed on election campaign expenditure.	Nil.

(Table 6)

Country	Legal Basis	Registration	Party Finance	Public Funding Support
<u>JAPAN</u>	Political Funds Control Law.	Information not available	In 1995, eight parties received a total of HK\$2.07 billion from the government, which amounted to 1/3 to 2/3 of their total revenue.	Parties which win five or more seats in the Diet or which receive more than 2% of the total votes in national election receive government subsidies.
<u>GERMANY</u>	<i>The Basic Law, Article 21</i> <i>The Law on Political Party (LPP)</i>	Must have a written charter and a written programme, a party's executive committee must be elected at least once every two years. Candidates for election must be chosen by secret ballot	The LPP defines what financing is permissible for a political party. Tax deductions; for donations to political parties up to HK\$25,380 for individuals and HK\$50,760 for married couples. All donations over HK\$84,600 must be recorded with donors' names and addresses.	Parties obtain 0.5% of votes in Bundestag or European Parliament or 1.0% in state level elections are eligible for reimbursement of election expenses. HK\$5.5 per vote for the first five million votes, and HK\$4.2 for each vote above. (a) matching contribution from government up to maximum of HK\$25,380 for donation from an individual. (b) matching government contribution at half of membership fee received.

(Table 6)

Country	Legal Basis	Registration	Party Finance	Public Funding Support
<u>NEW ZEALAND</u>	The Electoral Act 1993. The Broadcasting Act 1989	To contest the party vote in the proportional representation electoral system, political parties have to be registered with the Electoral Commission	The Electoral Act contains provisions for regulating party election expenses and disclosure of sources of significant donations. Election expenses of a registered party are limited to HK\$3.84 million if the party produces a party list for election, plus HK\$76,800 for each electorate candidate.	Through allocating election broadcasting funds and time. In 1999, a sum of HK\$8.06 million was shared among eligible political parties.
<u>SINGAPORE</u>	The Societies Act	Through the Registry of Societies	Nil.	Nil.

(Table 6)

Table 7 - Recent Electoral Reform

Country	Year	Electoral Reform
<u>FRANCE</u>	Nil	Nil
<u>UNITED STATES</u>	Nil	Nil
<u>UNITED KINGDOM</u>	1999	<p>Under the European Parliamentary Election Act 1999, Britain is divided into 9 regions, Scotland and Wales each constitutes a single region. Each region returning 4 to 11 Members of European Parliament. Election to European Parliament changed to proportional representation system.</p> <p>In Scotland, a new elected parliament was established in 1999. It has 129 members, elected every 4 years by a combined system of direct voting and proportional representation.</p> <p>In Wales, the 60-member Assembly was elected in 1999 under the same system as in Scotland.</p>

Country	Year	Electoral Reform
<u>JAPAN</u>	1994	<p>Electoral system altered from multi-seat constituency system to a combination of single-seat constituencies and seats allocated through proportional representation.</p> <p>Size of House of Representatives reduced to 500 seats, comprising 300 single-seat constituencies and 200 seats to be determined by proportional representation. A party gains one seat for a minimum 2% of votes cast.</p> <p>Each voter has 2 votes: one for the candidate in a single-seat district, the other for a political party in a regional bloc.</p> <p>Political donations exceeding HK\$3,425 are to be disclosed. Donations amounting to HK\$34,250 annually per private corporation are permitted, to be phased out after 5 years. Restriction on private donations is subsidized by the government under the Political Funds Control Law.</p> <p>Campaign literature limited to only certain kinds of leaflets and posters.</p>
<u>GERMANY</u>	Nil.	Nil.
<u>NEW ZEALAND</u>	1996	<p>Mixed Member Proportional Representation electoral system was introduced in 1996. Each voter has two votes: one for a member to represent the voter and the other for a party which the voter prefers. The overall number of candidates of each party elected to Parliament is determined by the national percentage of votes each party obtains. Minimum requirement to win a Parliamentary seat is 5% of the votes cast. Candidates may stand for election in an electorate and on their party's list. Party votes decide each party's share of Parliamentary seats.</p>

(Table 7)

Country	Year	Electoral Reform
<u>SINGAPORE</u>	1988	Constitution amended to introduce Group Representation Constituencies. Candidates run in teams, not on individual basis. Voters cast their votes for a team of candidates. The team of candidates which secures the highest number of votes collectively becomes Members of Parliament.
	1991	Constitution amended in January 1991 to provide for directly elected President of the Republic. First such President elected in August 1993.

(Table 7)

Table 8 - Constitutional Amendments

Country	Nature of Constitution	Amendment Procedure	Entrenchment
<u>FRANCE</u>	Written constitution of 1958, the Fifth French Republic	Revisions must be passed in identical forms by the National Assembly and Senate of Parliament before being submitted for approval by either a popular referendum or voting by Congress (a joint session of the National Assembly and the Senate) which requires 3/5 majority of votes cast. The President of the Republic, upon the proposal of the Government or Parliament, may submit a referendum that deals with certain prescribed subjects.	No amendment shall be commenced or continued if the integrity of the territory is jeopardized. The republic form of government shall not be the subject of constitutional amendment.
<u>UNITED STATES</u>	Written constitution	May be amended when two-thirds of both houses of the Congress propose amendments or when the congress is requested by two-thirds of the state legislatures to call a constitutional convention. All amendments must then be ratified by three-fourths of the state legislatures or conventions, based on the mode of ratification proposed by the Congress.	No amendment may deprive any state of equal suffrage in the Senate without its consent.

Country	Nature of Constitution	Amendment Procedure	Entrenchment
<u>UNITED KINGDOM</u>	No written constitution. Made up of statute law, common law, conventions, customs and traditions. Influenced by European Union laws and European Convention on Human Rights	May be altered by simple majority vote by Parliament, judgements by courts, international agreements, and by accepted changes in customs and traditions.	Not applicable.
<u>JAPAN</u>	Written constitution	Amendments are to be initiated by a two-thirds vote of the members of each house of the parliament and then submitted to the people for approval by a majority of all votes cast.	Nil.
<u>GERMANY</u>	Written constitution, known as the Basic Law	Must be approved by at least two-thirds of the members of each house of the legislature.	Prohibits amendments to first twenty articles and any change that would affect the division of the federation into states and the participation of the states in legislation.

(Table 8)

Country	Nature of Constitution	Amendment Procedure	Entrenchment
<u>NEW ZEALAND</u>	No written constitution. Make up of Acts of Parliament, prerogative instruments, decisions of the Courts, customary international law, the law and custom of Parliament and conventions of the constitution.	May be altered by simple majority of Parliament. The only exception is section 268 of the Electoral Act 1993, which requires a referendum of a special majority (75%) of the House of Representatives to alter certain sections (such as method of voting) of the Act.	Nil.
<u>SINGAPORE</u>	Written constitution. The Constitution of the Republic of Singapore.	By more than 2/3 of the total number of the elected MPs, a referendum is required for amendments to Part 3 of the Constitution, Protection of the Sovereignty of Singapore.	Nil.

(Table 8)