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## CHAPTER 2

# THE WESTMINSTER MODEL OF DEMOCRACY

In this book I use the term *Westminster model* interchangeably with *majoritarian model* to refer to a general model of democracy. It may also be used more narrowly to denote the main characteristics of *British* parliamentary and governmental institutions (G. Wilson 1994; Mahler 1997)—the Parliament of the United Kingdom meets in the Palace of Westminster in London. The British version of the Westminster model is both the original and the best-known example of this model. It is also widely admired. Richard Rose (1974, 131) points out that, “with confidence born of continental isolation, Americans have come to assume that their institutions—the Presidency, Congress and the Supreme Court—are the prototype of what should be adopted elsewhere.” But American political scientists, especially those in the field of comparative politics, have tended to hold the British system of government in at least equally high esteem (Kavanagh 1974).

One famous political scientist who fervently admired the Westminster model was President Woodrow Wilson. In his early writings he went so far as to urge the abolition of presidential government and the adoption of British-style parliamentary government

in the United States. Such views have also been held by many other non-British observers of British politics, and many features of the Westminster model have been exported to other countries: Canada, Australia, New Zealand, and most of Britain's former colonies in Asia, Africa, and the Caribbean when they became independent. Wilson (1884, 33) referred to parliamentary government in accordance with the Westminster model as "the world's fashion."

The ten interrelated elements of the Westminster or majoritarian model are illustrated by features of three democracies that closely approximate this model and can be regarded as the majoritarian prototypes: the United Kingdom, New Zealand, and Barbados. Britain, where the Westminster model originated, is clearly the first and most obvious example to use. In many respects, however, New Zealand is an even better example—at least until its sharp turn away from majoritarianism in October 1996. The third example—Barbados—is also an almost perfect prototype of the Westminster model, although only as far as the first (executives-parties) dimension of the majoritarian-consensus contrast is concerned. In the following discussion of the ten majoritarian characteristics in the three countries, I emphasize not only their conformity with the general model but also occasional deviations from the model, as well as various other qualifications that need to be made.

#### THE WESTMINSTER MODEL IN THE UNITED KINGDOM

1. *Concentration of executive power in one-party and bare-majority cabinets.* The most powerful organ of British government is the cabinet. It is normally composed of members of the party that has the majority of seats in the House of Commons, and the minority is not included. Coalition cabinets are rare. Because in the British two-party system the two principal parties are of approximately equal strength, the party that wins the elections usually represents no more than a narrow majority, and the minority is relatively large. Hence the British one-party and bare-majority cabinet is the perfect embodiment of the principle of

majority rule: it wields vast amounts of political power to rule as the representative of and in the interest of a majority that is not of overwhelming proportions. A large minority is excluded from power and condemned to the role of opposition.

Especially since 1945, there have been few exceptions to the British norm of one-party majority cabinets. David Butler (1978, 112) writes that “clear-cut single-party government has been much less prevalent than many would suppose,” but most of the deviations from the norm—coalitions of two or more parties or minority cabinets—occurred from 1918 to 1945. The only instances of minority cabinets in the postwar period were two minority Labour cabinets in the 1970s. In the parliamentary election of February 1974, the Labour party won a plurality but not a majority of the seats and formed a minority government dependent on all other parties not uniting to defeat it. New elections were held that October and Labour won an outright, albeit narrow, majority of the seats; but this majority was eroded by defections and by-election defeats, and the Labour cabinet again became a minority cabinet in 1976. It regained a temporary legislative majority in 1977 as a result of the pact it negotiated with the thirteen Liberals in the House of Commons: the Liberals agreed to support the cabinet in exchange for consultation on legislative proposals before their submission to Parliament. No Liberals entered the cabinet, however, and the cabinet therefore continued as a minority instead of a true coalition cabinet. The so-called Lab-Lib pact lasted until 1978, and in 1979 Labour Prime Minister James Callaghan’s minority cabinet was brought down by a vote of no confidence in the House of Commons.

The only instance of a coalition cabinet in the postwar period is the government formed after the May 2010 election, which, as in February 1974, did not produce a clear winner. The incumbent Labour government was defeated, but the Conservatives won only a plurality instead of a majority of the seats. In order to have majority support in the House of Commons, they formed a coalition cabinet with the small Liberal Democratic party. Conser-

vative leader David Cameron became prime minister and Liberal Democratic leader Nick Clegg deputy prime minister. However, coalition and minority cabinets are likely to remain the exception. They tend to be formed only when an election produces what in Britain is called a “hung parliament” without a majority winner—a very unusual election outcome.

2. *Cabinet dominance.* The United Kingdom has a parliamentary system of government, which means that the cabinet is dependent on the confidence of Parliament. In theory, because the House of Commons can vote a cabinet out of office, it “controls” the cabinet. In reality, the relationship is reversed. Because the cabinet is composed of the leaders of a cohesive majority party in the House of Commons, it is normally backed by the majority in the House of Commons, and it can confidently count on staying in office and getting its legislative proposals approved. The cabinet is clearly dominant vis-à-vis Parliament.

Because strong cabinet leadership depends on majority support in the House of Commons and on the cohesiveness of the majority party, cabinets lose some of their predominant position when either or both of these conditions are absent. Especially during the periods of minority government in the 1970s, there was a significant increase in the frequency of parliamentary defeats of important cabinet proposals. This even caused a change in the traditional view that cabinets must resign or dissolve the House of Commons and call for new elections if they suffer a defeat on either a parliamentary vote of no confidence or a major bill of central importance to the cabinet. The new unwritten rule is that only an explicit vote of no confidence necessitates resignation or new elections. The normalcy of cabinet dominance was largely restored in the 1980s under the strong leadership of Conservative Prime Minister Margaret Thatcher.

Both the normal and the deviant situations show that it is the disciplined two-party system rather than the parliamentary system that gives rise to executive dominance. In multiparty parliamentary systems, cabinets—which are often coalition cabinets—

tend to be much less dominant (Peters 1997). Because of the concentration of power in a dominant cabinet, former cabinet minister Lord Hailsham (1978, 127) has called the British system of government an “elective dictatorship.”<sup>1</sup>

3. *Two-party system.* British politics is dominated by two large parties: the Conservative party and the Labour party. Other parties also contest elections and win seats in the House of Commons—in particular the Liberals and, after their merger with the Social Democratic party in the late 1980s, the Liberal Democrats (situated in the political center, between Labour on the left and the Conservatives on the right)—but they are not large enough to be overall victors. Minor parties, like the Scottish National party, the Welsh nationalists, and several Northern Ireland parties, never manage to win more than a handful of votes and seats. The bulk of the seats are captured by the two major parties, and they form the cabinets: the Labour party from 1945 to 1951, 1964 to 1970, 1974 to 1979, and 1997 to 2010, and the Conservatives from 1951 to 1964, 1970 to 1974, and in the long stretch from 1979 to 1997. The hegemony of these two parties was especially pronounced between 1950 and 1970: jointly they never won less than 87.5 percent of the votes and 98 percent of the seats in the House of Commons in the seven elections held in this period.

The interwar years were a transitional period during which

1. In presidential systems of government, in which the presidential executive cannot normally be removed by the legislature (except by impeachment), the same variation in the degree of executive dominance can occur, depending on exactly how governmental powers are separated. In the United States, president and Congress can be said to be in a rough balance of power, but presidents in France and in some of the Latin American countries are considerably more powerful. Guillermo O'Donnell (1994, 59–60) has proposed the term “delegative democracy”—akin to Hailsham’s “elective dictatorship”—for systems with directly elected and dominant presidents; in such “strongly majoritarian” systems, “whoever wins election to the presidency is thereby entitled to govern as he or she sees fit, constrained only by the hard facts of existing power relations and by a constitutionally limited term of office.”

the Labour party replaced the Liberals as one of the two big parties, and in the 1945 election, the Labour and Conservative parties together won about 85 percent of the votes and 92.5 percent of the seats. Their support declined considerably after 1970: their joint share of the popular vote ranged from only about 65 percent (in 2010) to less than 81 percent (in 1979), but they continued to win a minimum of 93 percent of the seats in the elections from 1974 to 1992 and about 86 percent of the seats from 1997 on. The Liberal Democrats were the main beneficiaries, but mainly in terms of votes instead of seats. In the four elections from 1997 to 2010, they won an average of 20 percent of the popular vote—but never more than 10 percent of the seats in the House of Commons.

4. *Majoritarian and disproportional system of elections.* The House of Commons is a large legislative body with a membership that has varied between 625 and 659 since 1945. The members are elected in single-member districts according to the plurality method, which in Britain is usually referred to as the “first past the post” system: the candidate with majority vote or, if there is no majority, with the largest minority vote wins. This system tends to produce highly disproportional results. The 2005 election provides the most glaring example: the Labour party won an absolute parliamentary majority of 355 out of 646 seats with only 35.2 percent of the popular vote. In all of the elections between October 1974 and 2005, the winning party won clear majorities of seats with never more than 44 percent of the vote. All of these majorities have been what Douglas W. Rae (1967, 74) aptly calls “manufactured majorities”—majorities that are artificially created by the electoral system out of mere pluralities of the vote. In fact, all the winning parties since 1945 have won with the benefit of such manufactured majorities. It may therefore be more accurate to call the United Kingdom a *pluralitarian* democracy instead of a majoritarian democracy. The disproportionalism of the plurality method can even produce an overall winner who has failed to win a plurality of the votes: the Conservatives won a clear seat majority in 1951 not just with less than a majority of the votes but also with fewer votes than the Labour party had received.

The disproportional electoral system has been particularly disadvantageous to the Liberals and Liberal Democrats, who have therefore long been in favor of introducing some form of proportional representation (PR). But because plurality has greatly benefited the Conservatives and Labour, these two major parties have remained committed to the old disproportional method. Nevertheless, there are some signs of movement in the direction of PR. For one thing, PR was adopted for all elections in Northern Ireland (with the exception of elections to the House of Commons) after the outbreak of Protestant-Catholic strife in the early 1970s. For another, soon after Labour's election victory in 1997, Prime Minister Tony Blair's new cabinet decided that the 1999 election of British representatives to the European Parliament would be by PR—bringing the United Kingdom in line with all of the other members of the European Union. Proportional representation is also used for the election of the new regional assemblies for Scotland and Wales. Clearly, the principle of proportionality is no longer anathema. Still, it is wise to heed the cautionary words of Graham Wilson (1997, 72), who points out that the two major parties have a long history of favoring basic reforms, but only until they gain power; then “they back away from changes such as electoral reform which would work to their disadvantage.” As part of their price for joining the Cameron cabinet in 2010, the Liberal Democrats were promised a referendum on electoral reform. Significantly, however, the option to be submitted to the voters would be not PR but the so-called alternative vote, which, like plurality, is a majoritarian electoral method (see Chapter 8). Moreover, the Conservatives' concession did not include a promise to support even this relatively small reform in the referendum campaign, and in the end they actively campaigned against it: it lost by a more than two to one margin in May 2011 (Qvortrup 2012).

5. *Interest group pluralism.* By concentrating power in the hands of the majority, the Westminster model of democracy sets up a government-versus-opposition pattern that is competitive and adversarial. Competition and conflict also characterize the ma-

goritarian model's typical interest group system: a system of free-for-all pluralism. It contrasts with interest group corporatism in which regular meetings take place between the representatives of the government, labor unions, and employers' organizations to seek agreement on socioeconomic policies; this process of coordination is often referred to as *concertation*, and the agreements reached are often called *tripartite* pacts. Concertation is facilitated if there are relatively few, large, and strong interest groups in each of the main functional sectors—labor, employers, farmers—and/or if there is a strong peak organization in each of the sectors that coordinates the preferences and desired strategies for each sector. Pluralism, in contrast, means a multiplicity of interest groups that exert pressure on the government in an uncoordinated and competitive manner.

Britain's interest group system is clearly pluralist. The one exception is the 1975 Social Contract on wages and prices concluded between the Labour government, the main labor union federation (the Trades Union Congress), and the main employers' federation (the Confederation of British Industry). This contract fell apart two years later when the government failed to get union agreement to accept further wage restraints and imposed wage ceilings unilaterally. The 1980s were characterized even more by grim confrontations between Margaret Thatcher's Conservative government and the labor unions—the very opposite of concertation and corporatism. Not much changed under the Labour government that was in power from 1997 to 2010. Michael Gallagher, Michael Laver, and Peter Mair (2011, 467, 471) write that Britain is “often cited as one of the classic examples of a pluralist rather than a corporatist system,” and they predict that the country is highly unlikely “to move away from an essentially pluralist form of interest group representation.”

6. *Unitary and centralized government.* The United Kingdom is a unitary and centralized state. Local governments perform a series of important functions, but they are the creatures of the central government and their powers are not constitutionally guar-



anted (as in a federal system). Moreover, they are financially dependent on the central government. There are no clearly designated geographical and functional areas from which the parliamentary majority and the cabinet are barred. The Royal Commission on the Constitution under Lord Kilbrandon concluded in 1973: “The United Kingdom is the largest unitary state in Europe and among the most centralised of the major industrial countries in the world” (cited in Busch 1994, 60).

Two exceptions should be noted. One is that Northern Ireland was ruled by its own parliament and cabinet with a high degree of autonomy—more than what most states in federal systems have—from 1921, when the Republic of Ireland became independent, until the imposition of direct rule from London in 1972. It is also significant, however, that Northern Ireland’s autonomy could be, and was, eliminated in 1972 by Parliament by means of a simple majoritarian decision. The second exception is the gradual movement toward greater autonomy for Scotland and Wales—“devolution,” in British parlance. But it was not until September 1997 that referendums in Scotland and Wales finally approved the creation of autonomous and directly elected Scottish and Welsh assemblies (Trench 2007). Devolution, however, has not gone hand in hand with decentralization within England, by far the largest and most important of the United Kingdom’s four component parts. The London *Economist* argues that it is still “the West’s most centralised” system (Ganesh 2010).

7. *Concentration of legislative power in a unicameral legislature.* For the organization of the legislature, the majoritarian principle of concentrating power means that legislative power should be concentrated in a single house or chamber. In this respect, the United Kingdom deviates from the pure majoritarian model. Parliament consists of two chambers: the House of Commons, which is popularly elected, and the House of Lords, which used to consist mainly of members of the hereditary nobility but also contained a large number of so-called life peers, appointed by the government. The 1999 House of Lords Act removed all but

ninety-two hereditary peers, and the appointed members now form the overwhelming majority in the House of Lords. The relationship between the two houses is asymmetrical: almost all legislative power belongs to the House of Commons. The only power that the House of Lords retains is the power to delay legislation: money bills can be delayed for one month and all other bills for one year. The one-year limit was established in 1949; between the first major reform of 1911 and 1949, the Lords' delaying power was about two years, but in the entire period since 1911 they have usually refrained from imposing long delays.

Therefore, although the British bicameral legislature deviates from the majoritarian model, it does not deviate much: in everyday discussion in Britain, "Parliament" refers almost exclusively to the House of Commons, and the highly asymmetric bicameral system may also be called near-unicameralism. The change from near-unicameralism to pure unicameralism would not be a difficult step: it could be decided by a simple majority in the House of Commons and, if the Lords objected, merely a one-year delay.

8. *Constitutional flexibility.* Britain has a constitution that is "unwritten" in the sense that there is not one written document that specifies the composition and powers of the governmental institutions and the rights of citizens. These are defined instead in a number of basic laws—like the Magna Carta of 1215, the Bill of Rights of 1689, and the Parliament Acts of 1911 and 1949—common law principles, customs, and conventions. The fact that the constitution is unwritten has two important implications. One is that it makes the constitution completely flexible because it can be changed by Parliament in the same way as any other laws—by regular majorities instead of the supermajorities, like two-thirds majorities, required in many other democracies for amending their written constitutions. One slight exception to this flexibility is that opposition by the House of Lords may force a one-year delay in constitutional changes.

9. *Absence of judicial review.* The other important implication of an unwritten constitution is the absence of judicial review:

there is no written constitutional document with the status of “higher law” against which the courts can test the constitutionality of regular legislation. Although Parliament normally accepts and feels bound by the rules of the unwritten constitution, it is not formally bound by them. With regard to both changing and interpreting the constitution, therefore, Parliament—that is, the parliamentary majority—can be said to be the ultimate or sovereign authority. In A. V. Dicey’s (1915, 37–38) famous formulation, parliamentary sovereignty “means neither more nor less than this, namely, that Parliament . . . has, under the English constitution, the right to make or unmake any law whatever; and, further, that no person or body is recognised by the law of England as having the right to override or set aside the legislation of Parliament.”

One exception to parliamentary sovereignty is that when Britain entered the European Community—a supranational instead of merely an international organization—in 1973, it accepted the Community’s laws and institutions as higher authorities than Parliament with regard to several areas of policy. Because sovereignty means supreme and ultimate authority, Parliament can therefore no longer be regarded as fully sovereign. Britain’s membership in the European Community—now called the European Union—has also introduced a measure of judicial review both for the European Court of Justice and for British courts: “Parliament’s supremacy is challenged by the right of the Community institutions to legislate for the United Kingdom (without the prior consent of Parliament) and by the right of the courts to rule on the admissibility (in terms of Community law) of future acts of Parliament” (Coombs 1977, 88). Similarly, Britain has been a member of the European Convention on Human rights since 1951, and its acceptance of an optional clause of this convention in 1966 has given the European Court of Human Rights in Strasbourg the right to review and invalidate any state action, including legislation, that it judges to violate the human rights entrenched in the convention (Cappelletti 1989, 202; Johnson 1998, 155–58).

10. *A central bank controlled by the executive.* Central banks are responsible for monetary policy, and independent banks are widely considered to be better at controlling inflation and maintaining price stability than banks that are dependent on the executive. However, central bank independence is clearly in conflict with the Westminster model's principle of concentrating power in the hands of the one-party majority cabinet. As expected, the Bank of England has indeed not been able to act independently and has instead been under the control of the cabinet. During the 1980s, pressure to make the Bank of England more autonomous increased. Two Conservative chancellors of the exchequer tried to convince their colleagues to take this big step away from the Westminster model, but their advice was rejected (Busch 1994, 59). It was not until 1997—one of the first decisions of the newly elected Labour government—that the Bank of England was given the independent power to set interest rates. The degree of central bank independence is commonly measured on a scale developed by Alex Cukierman, ranging from a low of 0 to a high of 1 (see Chapter 13). From 1997 to 1998, the score for the British central bank rose from 0.27 to 0.47—indicating a significant increase in its independence but still well below, for instance, the Swiss and German scores of 0.64 and 0.69 during most of the 1990s (Polillo and Guillén 2005).

The recent changes in British politics do not change the overall character of Britain as a prime example of majoritarian democracy. As Matthew Flinders (2010, emphasis added) puts it—to cite the title and subtitle of his book—the first decade of the twenty-first century was a period of “democratic drift” and “majoritarian *modification*” rather than any basic shift away from the Westminster model.

#### THE WESTMINSTER MODEL IN NEW ZEALAND

Many of the Westminster model's features have been exported to other members of the British Commonwealth, but only one country adopted virtually the entire model: New Zealand. A major

change away from majoritarianism took place in 1996 when New Zealand held its first election by PR, but the New Zealand political system before 1996 can serve as a second instructive example of how the Westminster model works.

1. *Concentration of executive power in one-party and bare-majority cabinets.* For six decades, from 1935 to the mid-1990s, New Zealand had single-party majority cabinets without exceptions or interruptions. Two large parties—the Labour party and the National party—dominated New Zealand politics, and they alternated in office. The one-party majority cabinet formed after the last plurality election in 1993 suffered a series of defections and briefly became a quasi-coalition cabinet (a coalition with the recent defectors), then a one-party minority cabinet, and finally a minority coalition—but all of these unusual cabinets occurred in the final phase of the transition to the new non-Westminster system (Boston, Levine, McLeay, and Roberts 1996, 93–96). The only other deviations from single-party majority government happened much earlier: New Zealand had a wartime coalition cabinet from 1915 to 1919, and another coalition was in power from 1931 to 1935.

2. *Cabinet dominance.* In this respect, too, New Zealand was a perfect example of the Westminster model. Just as during most of the postwar period in the United Kingdom, the combination of the parliamentary system of government and a two-party system with cohesive parties made the cabinet predominate over the legislature. In the words of New Zealand political scientist Stephen Levine (1979, 25–26), the “rigidly disciplined two-party system has contributed to the concentration of power within the Cabinet, formed from among the Members of Parliament . . . belonging to the majority party.”

3. *Two-party system.* Two large parties were in virtually complete control of the party system, and only these two formed cabinets during the six decades from 1935 to the mid-1990s: the Labour party (1935–49, 1957–60, 1972–75, and 1984–90) and the right-of-center National party (1949–57, 1960–72, 1975–84, and

after 1990). Moreover, unlike in Britain, third parties were almost absent from the New Zealand House of Representatives. In eleven of the seventeen elections from 1946 to 1993, the two large parties divided all of the seats; in five elections, only one other party gained one or two seats; and, in 1993, two small parties gained two seats each (out of ninety-nine). New Zealand's two-party system was therefore an almost pure two-party system.

4. *Majoritarian and disproportional system of elections.* The House of Representatives was elected according to the plurality method in single-member districts. The only unusual feature was that there were four special large districts, geographically overlapping the regular smaller districts, reserved for the Maori minority (representing about 12 percent of the population). These four districts entailed a deviation from the majoritarianism of the Westminster model because their aim was to guarantee minority representation. From 1975 on, all Maori voters have had the right to register and vote either in the regular district or in the special Maori district in which they reside.

As in the United Kingdom, the plurality system produced severely disproportional results, especially in 1978 and 1981. In the 1978 election, the National party won a clear majority of fifty-one out of ninety-two seats even though it won neither a majority of the popular votes—its support was only 39.8 percent—nor a plurality, because Labour's popular vote was 40.4 percent; the Social Credit party's 17.1 percent of the vote yielded only one seat. In 1981, the National party won another parliamentary majority of forty-seven out of ninety-two seats and again with fewer votes than Labour, although the respective percentages were closer: 38.8 and 39.0 percent; Social Credit now won 20.7 percent of the popular vote—more than half of the votes gained by either of the two big parties—but merely two seats. Moreover, all of the parliamentary majorities from 1954 on were manufactured majorities, won with less than majorities of the popular vote. In this respect, New Zealand was, like the United Kingdom, more a pluralitarian than a majoritarian democracy.

5. *Interest group pluralism.* New Zealand's interest group sys-

tem, like Britain's, is clearly pluralist. Also, again like Britain, New Zealand has had high strike levels—indicative of confrontation instead of concertation between labor and management. In comparative studies of corporatism and pluralism, many scholars have tried to gauge the precise degree to which the interest group systems of the industrialized democracies are corporatist or pluralist. Their judgments differ considerably with regard to a few of these countries, but on Great Britain and New Zealand there is little disagreement: both belong on the extreme pluralist end of the pluralist-corporatist spectrum (Lijphart and Crepaz 1991; Siaroff 1999).

6. *Unitary and centralized government.* The “Act to Grant a Representative Constitution to the Colony of New Zealand,” passed by the British parliament in 1852, created six provinces with considerable autonomous powers and functions vis-à-vis the central government, but these provinces were abolished in 1875. Today's governmental system is unitary and centralized—not as surprising, of course, for a country with a population of about four million than for the United Kingdom with its much larger population of about sixty million people.

7. *Concentration of legislative power in a unicameral legislature.* For about a century, New Zealand had a bicameral legislature, consisting of an elected lower house and an appointed upper house, but the upper house gradually lost power. Its abolition in 1950 changed the asymmetrical bicameral system into pure unicameralism.

8. *Constitutional flexibility.* Like the United Kingdom, New Zealand lacks a single written constitutional document. Its “unwritten” constitution has consisted of a number of basic laws—like the Constitution Acts of 1852 and 1986, the Electoral Acts of 1956 and 1993, and the Bill of Rights Act of 1990—conventions, and customs.<sup>2</sup> Some key provisions in the basic laws are “entrenched” and can be changed only by three-fourths majorities of

2. The Constitution Act of 1852 and Electoral Act of 1956 were superseded by the two later acts.

the membership of the House of Representatives or by a majority vote in a referendum; however, this entrenchment can always be removed by regular majorities, so that, in the end, majority rule prevails. Hence, like the British parliament, the parliament of New Zealand is sovereign. Any law, including laws that “amend” the unwritten constitution, can be adopted by regular majority rule. As one of New Zealand’s constitutional law experts puts it, “The central principle of the Constitution is that there are no effective legal limitations on what Parliament may enact by the ordinary legislative process” (Scott 1962, 39).

9. *Absence of judicial review.* Parliamentary sovereignty also means, as in Britain, that the courts do not have the right of judicial review. The House of Representatives is the sole judge of the constitutionality of its own legislation.

10. *A central bank controlled by the executive.* Andreas Busch (1994, 65) writes that historically New Zealand “has been a country with . . . a very low degree of central bank independence,” and for the period until 1989, he gives the Reserve Bank of New Zealand his lowest rating—indicating even less autonomy than that of its British counterpart. The Reserve Bank Act of 1989 increased the bank’s independence, but only slightly: the Cukierman index of central bank independence rose from 0.24 to 0.31—well below the level of the Bank of England after 1997 (Cukierman, Webb, and Neyapti 1994; Polillo and Guillén 2005).

With only one exception—the parliamentary seats reserved for the Maori minority—democracy in New Zealand was, until 1996, more clearly majoritarian and hence a better example of the Westminster model than British democracy. In fact, especially in view of the minority cabinets and frequent defeats of cabinet proposals in Britain in the 1970s, Richard Rose could legitimately claim that New Zealand was “the only example of the true British system left” (personal communication, April 8, 1982). However, the adoption of PR and the first PR election of parliament in October 1996 entailed a radical shift away from the Westminster model.

The two major parties were opposed to PR, but they both unintentionally contributed to its adoption. The first impetus was



the Labour party's unhappiness with the results of the 1978 and 1981 elections, mentioned above, in which the National party won parliamentary majorities not only with less than 40 percent of the popular vote but with fewer votes than the Labour party had received. When Labour was returned to power in 1984, it appointed a Royal Commission on the Electoral System to recommend improvements. The commission's terms of reference were very broad, however, and it recommended not just small adjustments but a radical change to PR as well as a referendum on whether to adopt it. The government tried to deflect the proposal by turning it over to a parliamentary committee, which, as expected, rejected PR and instead merely recommended minor changes. The election campaign of 1987 put PR back on the political agenda: the Labour prime minister promised to let the voters decide the issue by referendum, but his party retreated from this pledge after being reelected. Seeking to embarrass Labour, the National party opportunistically made the same promise in the 1990 campaign, and when they won the election, they could not avoid honoring it. The voters then twice endorsed PR in referendums held in 1992 and 1993 (Jackson and McRobie 1998).

The form of PR that was adopted was modeled after the German system. In the first PR election, held in 1996, sixty-five members were elected by plurality in single-member districts—including five special Maori districts—and fifty-five members by PR from party lists. The second set of fifty-five seats had to be allocated to the parties in a way that made the overall result as proportional as possible.<sup>3</sup> This crucial provision made the new system clearly and fully a PR system, although the New Zealand term of “mixed member proportional” (MMP) system seems to imply that it is a mixture of PR and something else. The same rules have governed subsequent elections, although the numbers

3. Each voter has two votes, one for a district candidate and one for a party list. To avoid excessive fragmentation, parties must win either a minimum of 5 percent of the list votes or at least one district seat to qualify for list seats.

of single-member and Maori districts as well as the number of party list seats have undergone slight adjustments.

The first PR election instantly transformed New Zealand politics in several respects (Vowles, Aimer, Banducci, and Karp 1998). First, the election result was much more proportional than those of the previous plurality elections. The largest party, the National party, was still overrepresented, but by less than three percentage points; it won 33.8 percent of the vote and 36.7 percent of the seats. Second, the election produced a multiparty system with an unprecedented six parties gaining representation in parliament. Third, unlike in any other postwar election, no party won a majority of the seats. Fourth, in contrast with the long line of previous single-party majority cabinets, the National party entered into a two-party coalition cabinet with the New Zealand First party, the main representative of the Maori minority, which had won seventeen seats including all five of the special Maori seats. This cabinet still enjoyed majority support in the legislature, but all of the subsequent cabinets have been minority coalition or minority single-party cabinets.

Because of these significant deviations from the majoritarian model, post-1996 New Zealand is no longer a good, let alone the best, example of the “true British system.” Hence, in Kurt von Mettenheim’s (1997, 11) words, “The United Kingdom [now] appears to be the only country to have retained the central features of the Westminster model.” It should be noted, however, that all of the post-1996 changes in New Zealand have to do with the executives-parties dimension of the majoritarian model, comprising the first five of the ten characteristics of the model, and that, especially with regard to this first dimension, several other former British colonies continue to have predominantly Westminster-style institutions. A particularly clear and instructive example is Barbados.

#### THE WESTMINSTER MODEL IN BARBADOS

Barbados is a small island state in the Caribbean with a population of about a quarter of a million. It has a “strongly homoge-

neous society” that is mainly of African descent (Duncan 1994, 77). It gained its independence from Britain in 1966, but there continues to be “a strong and pervasive sense of British tradition and culture” (Muller, Overstreet, Isacoff, and Lansford 2011, 116)—including British *political* traditions. Barbados is often called the “Little England” of the Caribbean.

1. *Concentration of executive power in one-party and bare-majority cabinets.* Since independence in 1966, Barbados has had single-party majority cabinets. Its two large parties—the Barbados Labour party (BLP) and the Democratic Labour party (DLP)—have been the overwhelmingly dominant forces in Barbados politics, and they have alternated in office. Unlike in the British and New Zealand cases, there are no exceptions or qualifications to this pattern that need to be noted. In fact, the pattern extends back to colonial times. Ever since the establishment of universal suffrage and cabinet government in the early 1950s, the sequence of single-party majority cabinets has been unbroken.

2. *Cabinet dominance.* Barbadian cabinets have been at least as dominant as those of the two earlier examples of the Westminster model. The term *elective dictatorship*, coined by Lord Hailsham for Britain, also fits the Barbados system well (Payne 1993, 69). One special reason for the predominance of the cabinet in Barbados is the small size of the legislature. The Barbadian House of Assembly had only twenty-four members from 1966 to 1981; this number was increased slightly to twenty-seven in 1981, twenty-eight in 1991, and thirty in 2003. Many of the legislators are therefore also cabinet ministers, which in turn means that, as Trevor Munroe (1996, 108) points out, almost one-third of the members of the legislature “are in effect constitutionally debarred from an independent and critical stance in relation to the executive.”

3. *Two-party system.* The same two large parties have controlled the party politics of Barbados since independence, and they have formed all of the cabinets: the left-of-center DLP from 1966 to 1976, from 1986 to 1994, and from 2008 on, and the more conservative BLP between 1976 and 1986 and between 1994 and 2008. In

eight of the ten elections since 1966, no third parties won any seats, only one small party won two seats in 1966, and another small party won one seat in 1994. The strength of the two-party system is also illustrated by the fate of the four members of parliament who defected from the ruling DLP in 1989 and formed a separate party. As Tony Thorndike (1993, 158) writes, the new party “did not long survive the logic of the ‘first past the post’ Westminster system and the two-party culture of Barbados. In elections in January 1991 it lost all its four seats.”

4. *Majoritarian and disproportional system of elections.* In the elections before independence, including the 1966 elections, which was held several months before formal independence took place, Barbados used the plurality method but not in the usual single-member districts. Instead, two-member districts were used (Emmanuel 1992, 3; Duncan 1994, 78); these tend to increase the disproportionality of the election results because, in plurality systems, disproportionality increases as the number of representatives elected per district increases. Since 1971, all elections have been by plurality in single-member districts, but electoral disproportionality has remained high. For instance, in 1986 the DLP won twenty-four of the twenty-seven seats (88.9 percent) with 59.4 percent of the votes, and in 1999 the BLP won twenty-six of the twenty-eight seats (92.9 percent) with 64.9 percent of the votes. In three of the elections since 1966, the parliamentary majorities were “manufactured” from pluralities of the vote, but in the other seven elections the seat majorities were genuinely “earned” with popular vote majorities. On balance, therefore, Barbados has been less of a pluralitarian democracy than Britain and New Zealand. Moreover, unlike the other two countries, Barbados has not experienced any instances of a parliamentary majority won on the basis of a second-place finish in the popular vote.

5. *Interest group pluralism.* Again like the United Kingdom and New Zealand, Barbados had an interest group system that was pluralist rather than corporatist in the first decades after independence. In 1993, however, the government, business leaders,

and labor unions negotiated an agreement on wages and prices, which included a wage freeze. This tripartite pact was renewed several times and lasted about fifteen years.

6–10. *The characteristics of the second (federal-unitary) dimension of the majoritarian model.* Barbados has a unitary and centralized form of government—not surprising for a small country with only a quarter of a million people—but as far as the other four characteristics of the federal-unitary dimension are concerned, it does not fit the pure majoritarian model. It has a bicameral legislature consisting of a popularly elected House of Assembly and an appointed Senate that can delay but not veto—a case of asymmetrical bicameralism. It has a written constitution that can be amended only by two-thirds majorities in both houses of the legislature. The constitution explicitly gives the courts the right of judicial review. Finally, the central bank of Barbados has a charter that gives it a medium degree of autonomy in monetary policy; its Cukierman score has been a steady 0.38—higher than those of the New Zealand and pre-1997 British central banks (Cukierman, Webb, and Neyapti 1994; Polillo and Guillén 2005).

Anthony Payne (1993) argues that the former British colonies in the Caribbean are characterized not by Westminster systems but by “Westminster adapted.” As illustrated by Barbados—but by and large also true for the other Commonwealth democracies in the region—this adaptation has affected mainly the second dimension of the Westminster model. On the first (executives-parties) dimension, the Westminster model has remained almost completely intact. The fact that Barbados deviates from majoritarianism with regard to most of the characteristics of the federal-unitary dimension does not mean, of course, that it deviates to such an extent that it is a good example of the contrasting model of consensus democracy. In order to illustrate the consensus model, I turn in the next chapter to the examples of Switzerland, Belgium, and the European Union.