

Politics in Britain and the United States

Comparative Perspectives

Edited by Richard Hodder-Williams and James Ceaser

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Introduction

For many years, political analysts in the United Kingdom and the United States have been fascinated with the political institutions and practices of the "other" land, and some of the most perceptive writings on these nations' politics has been done by non-natives. Hence, in the summer of 1984, four hundred years after the first settlers from Britain landed on what is now Roanoke Island in North Carolina, the British and American contributors to this volume welcomed the opportunity offered by Duke University and the North Carolina Department of Cultural Resources to address the issues as part of a jointly sponsored British-American Festival. At a conference on the political systems of Great Britain and the United States sixteen scholars from both sides of the Atlantic met at Duke for an intensive series of seminars held over a two-day period. This book presents the papers that were delivered at that conference, revised in light of the lively and stimulating discussion that took place in Durham.

The point of departure of such comparative analysis as this volume represents has normally been the awareness of differences. Outsiders naturally see the contrasts and in this way each country enlightens the other as to the peculiarities of what it may take for granted. Although it has been commonly acknowledged that the two nations share a commitment to the fundamental values of popular government, the rule of law, and the protection of individual rights, the focus of scholarship has traditionally been on the ways in which we

differ. In describing the political institutions of the two nations, a contrasting picture is usually drawn between the United Kingdom, with its parliamentary sovereignty, fusion of the executive and the legislature, centralized authority, disciplined and ideologically cohesive political parties, and an apolitical judiciary, on the one hand, and the United States, with its divided sovereignty, separation of the executive and the legislature, federalism, loose and ideologically inchoate political parties, and a politically active judiciary, on the other. The contrasts depicted between the political cultures of the two countries are equally great. In the United Kingdom, it is said, citizens accept a wide-ranging role for the state, are generally deferential to those in authority, structure their political activity through enduring parties, and divide along class lines; in the United States, however, it is said that citizens are generally opposed to much state involvement in economic and social matters, are suspicious of government power, structure their input into politics through group action, and divide along ethnic, regional, and religious lines which cut across class divisions.

However, there were in 1984 some specific considerations which made a comparative review of the two countries' political systems especially apposite. It seemed that on both sides of the Atlantic there were certain developments which suggested a growing similarity between the two countries: parallels in the economic strategies of President Ronald Reagan and Prime Minister Margaret Thatcher, a loosening of attachments to the parties, and the nationalizing and personalizing of politics through the ubiquitous reach of television, to mention but three. To some analysts, these and other developments offered the possibility that, despite manifest institutional and cultural differences, there was a genuine process of what might be considered a convergence of the two political systems. Indeed, some have argued that the very nature of modern industrial economies and the environment in which democratic politics takes place may almost ineluctably be driving these states along similar paths of development, making the differences between them merely decorative variations on a central theme. The essays assembled in this volume, with each focusing on one particular aspect of the political systems, implicitly address this more general thesis.

In several of the chapters there is corroborative evidence for this view and illustrations of the way in which the two nations are growing more alike than different. The most explicit expression of such a perspective is found in Jorgen Rasmussen's essay, where he writes

that “by the 1980s grounds existed for thinking that the American and British systems were converging in practice . . . the powers and roles [of President and Prime Minister] have more in common than in contrast . . . the similarities do seem more striking than the differences.” But there are echoes in Gary Marks’s concern to contrast the broadly similar Anglo-American political economies with their European variants, in Dennis Kavanagh’s initial presentation of the issues associated with the party systems, in Richard Hodder-Williams’s concentration on showing the political nature of the British appeal courts, and in Anthony King’s observation that “British and American politicians operate in pretty similar moral climates.”

Yet, while these essays taken as a whole may challenge the starting assumption that has guided so much scholarship, it is important not to speak in simplistic terms as though an entirely new approach or paradigm was being offered. References to “similarities,” if one is not careful, can prove to be highly misleading, for they are of two distinct kinds. The first kind embraces attitudes and behavior patterns which are, as a matter of observation, very nearly the same. The second focuses upon tendencies, upon the direction of change that brings one set of observed phenomena closer to another. It is in this latter sense that one may emphasize similarities between the United States and the United Kingdom in recent years. Identifying similar trends over time—say, dealignment or a growing readiness of interest groups to use litigation to advance their political programs—is quite different from asserting that the two political systems have reached a stage of functioning in broadly similar ways. Hence, the growing politicization of the judicial process and the developing presidentialism in Britain would be good examples of unmistakable trends but bad examples of contemporary similarities in actual performance.

These reflections lead to the observation that, if there is merit today in emphasizing the elements of convergence between the two political systems, it is as well still to keep in mind the often quite different baselines from which similar trends begin. Furthermore, there is the need to recognize those areas in which the two countries are obstinately different and in which one finds little or no trace of convergence. The essays in this volume, then, are not suggesting the radically novel view that the United States and the United Kingdom are converging in terms of their political systems, but they do provide a contemporary estimation of the extent to which there are growing similarities within systems retaining their distinct institutional forms and political cultures.

The book also addresses some of the most difficult and fascinating questions of comparative politics, illustrating how the comparative approach can illuminate our understanding of the politics of a single country. On the one hand, the difficulty of explaining political phenomena is highlighted by the continuous attention given to the relative significance of such factors as political and social institutions, economic and social changes, and political culture. The book points up the complexity of the interrelationships among these often tangled causes, sometimes stressing one, sometimes another. Those seeking simple explanations for recent developments in the two nations will not find them here. On the other hand, the focus on one country often throws into clear relief a distinguishing feature of the other, suggesting that explanation often depends on the absence of certain very fundamental elements that are present in the other system, such as confessional parties or widespread occupational and geographical mobility. These elements become much more observable in a comparative study.

It may be useful at this stage to abstract from the various essays the central themes of the conference to which the participants regularly returned, especially during the lengthy discussions which followed the brief presentation of each paper. Explanations for the tendency to converge alongside the enduring differences in the form and substance of political action could be categorized under three analytically separate heads. (Although they are analytically separable, in the real world of politics they interrelate in highly intricate and complicated ways.)

First, the environment in which political life took place in both the United States and the United Kingdom changed radically in the decades after the Second World War. The economic growth of the 1950s and 1960s did not continue at the same rate; social changes—educational expansion, the growth of leisure time, the decline of heavy industry, and the rise of service industries—metamorphosed the political maps of much of the electorate; technological changes, particularly those associated with the media, revolutionized the form and nature of political communication. From this perspective, the political systems of the two nations were pushed in similar directions as they responded to these major movements in the economy and society at large.

Second, the institutions and political cultures peculiar to each country largely determined the precise ways in which responses were made. It was just not sensible to explain the developments in the

United Kingdom and the United States—such as dealignment or attempted reforms in the bureaucracies—without a firm emphasis on the importance of federalism, or the separation of powers, or the sovereignty of Parliament. Nor, however, was it sensible to explain such developments without reference to the ideas and expectations held by political actors in the two countries. Precisely which factors were of crucial significance in any particular instance often depended not on some general theory of the relative importance of institutions and culture but on the details of that instance.

Third, therefore, the need to consider the details of individual political events was frequently stressed. The explanations for some actions and developments necessitated on occasion a particularist focus, not a general framework. Specific occurrences, indeed sometimes chance ones, profoundly affected the direction and timing of change as well as the style of political action and discourse.

It is important to keep these three themes separate and to avoid attributing some development to one rather than another through a failure to do so. For instance, the central importance of the Public Sector Borrowing Requirement, which became a major concern of Mrs. Thatcher's monetarist policies, originated, it should be remembered, under a Labour government. Perhaps we can best envisage the developing political systems of the United States and the United Kingdom as moving hesitantly in similar directions perpetually responding to three interlinked sources of pressure: social and technological change, the political institutions themselves together with their existing but not ossified political cultures, and the wild card of personality, chance, and accident. It would take a very complex equation indeed to provide a reliable predictive model involving these variables.

In many of the previous comparative studies of the United States and the United Kingdom, and indeed in many of the studies of one country by natives of the other, there has been a strong didactic tradition; the aim has seldom been just to explain, but rather to teach certain lessons and show how the weaknesses of one system might be alleviated by the importation of models from the other. This tendency has been particularly pronounced in the case of American students of British institutions, who, since at least the time of Woodrow Wilson, have made of the British system something of a model for American politics.¹ More recently, however, the problems encountered by successive British governments have led certain American writers to think of British approaches more in terms of measures to

avoid than to emulate.² Learning from the “other” country has been a lesser concern to British observers.³ The reason may have something to do with a well-known British complacency, but more likely it is a function of an intellectual tradition in Britain which divorces the academic study of politics from the offering of programmatic advice. Perhaps, too, the limited size of the political science profession in Britain when placed beside its American counterpart helps account for the difference. Yet a fascination for the United States remains. After all, the United States was torn from the British Empire, inherited many of the values and practices of the mother country, kept the English language—or, at least, a recognizable variant thereof—and became an ally of the United Kingdom and a partner in a shared alliance designed to help maintain Western Europe’s security.

The essays in this volume, as well as the discussions, seem again to pose a challenge to those who believe in either the possibility or desirability of major institutional transfers between the two countries. This point was strongly made by Jorgen Rasmussen and Dennis Kavanagh, both of whom appeared to adopt the view that each political system, like the human body, had a rejection system for any implants not strictly congruent with its political blood. Yet, it is by no means clear that their position entailed an entirely defeatist position to the effect that nothing could be transplanted. To continue the analogy, hearts and lungs might create impossible difficulties; but less central organs could perhaps survive the move. Certainly the specialist committees in the House of Commons were partly modeled on the congressional committees and, although they are less powerful and less well regarded than their American counterparts, they are an important and far from irrelevant innovation in the British parliamentary system.

Some areas of a political system, it can be argued, are more autonomous than others. The greater the degree of autonomy, the greater the possibility of institutional transfer. Party systems, political career patterns, legislative links to constituents and executives, these are all highly dependent upon so many people—already deeply socialized into certain beliefs, expectations, habits of thought, and perceptions—that their form and practice must necessarily be a function of the wider evolving political universe. But the staff organization of the chief executive, the role of “inners and outers” in public administration, and the campaigning techniques of individuals may be sufficiently autonomous for change to be induced or adopted by an act of will. The Prime Minister’s research unit is an obvious case in

point; advertising techniques would be another; and staffing capacities of legislatures would be a third. The point is simple: one country can learn from another, but the practicality of introducing major changes into an enduring and evolving political system, whose roots are deeply embedded in the political culture of the land, is a limited one.

Traditionally, writers on either side of the Atlantic had seen virtues in the opposite system which compensated for what seemed to be shortcomings in their own; in 1984 none of the participants was so dewy-eyed as to believe that major improvements could be had by institutional transfer. Even the least revolutionary suggestions would likely have a choppy passage. "Outers," who might in theory improve the decision-making process in Whitehall and introduce there new perspectives and ideas, would have to face an ingrained suspicion of outsiders from most of the permanent civil service and many politicians; any attempt in Britain to limit the sovereignty of Parliament, through specialist committees with real power to override ministers or a Bill of Rights with the duty to rein in overexuberant legislatures, would in all probability find majorities for such changes lacking. Interestingly, there has been little recent borrowing by American idealists from the British offerings, apart from searches to make executives more accountable to the elected legislature, but that too fell foul of a deeply ingrained belief in the ultimate virtue of separated powers.

This volume, accordingly, can be read on three levels. On the first, it describes through broad interpretive essays the political systems of the two oldest English-speaking democracies as they functioned in the early 1980s. On the second level, it sheds some light on reasons both for convergence and for continuing differences between the United Kingdom and the United States. The essays point up the subtle balance that existed in both countries between a number of factors, some with deep historical roots, some embedded in cultural expectations, some reflecting immediate and pressing problems, some the whimsical effect of chance. Systems which have persisted without revolution yet without a hardening of the arteries (as have both the British and American political systems) are continually changing in rhetoric and substance as different factors in turn become especially significant. This perspective, with its emphasis on the integrated and organic nature of the two systems, is the prerequisite for any consideration of institutional transfer. On the third level, this volume addresses some very central questions in comparative politics

by explaining the complex interrelationships among institutional, economic, and cultural forces in the context of two political systems with sufficient similarities to make such comparisons valuable and instructive. There is one final point to be made by way of introduction.

It is rare that scholars from two different countries have the chance to confer at leisure on so broad a topic, and some special thanks are in order to those who helped afford the opportunity. We are grateful to the British-American festival committee, and especially George Holt, Carolyn Conley, Joel Fleishman, and Richard Rowson, for their efforts in arranging so productive a seminar. Nelson Polsby kindly agreed to serve as moderator for the conference, injecting his own great wisdom and humor into the proceedings. Finally, the participants at the conference, including the large contingent of scholars from North Carolina, added greatly to the quality of the papers by their comments and suggestions. This volume is much more of a collaborative effort than most such emanations from academic conferences. We hope that the product is a fitting commemoration of the great collaborative enterprise begun on Roanoke Island four hundred years ago.

RICHARD HODDER-WILLIAMS
JAMES CEASER

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1

Executive and Legislative Roles

J O R G E N R A S M U S S E N

In the first chapter, Jorgen Rasmussen considers one area in which the political systems of the United States and Great Britain are sometimes thought to be converging: the growing dominance of the chief executive. Focusing upon those concerns which interested scholars of an earlier period who compared the two systems—preparation for executive leadership, coordinated policy programs, and executive accountability—he argues that the similarities do seem more striking than the differences. But the parallel is by no means simple. While the British Prime Minister might give the appearance of dominance within the executive and party solidarity in the legislature suggests few difficulties from that quarter, the reality is actually a Prime Minister defeated on several issues and a legislature constantly to be wooed. In the United States the President, too, has his failures and must negotiate with the legislature. The institutional arrangements and the informal conventions associated with the two systems do vary, but the political realities have made Presidents more like Prime Ministers and Prime Ministers more like Presidents. Even in the matter of accountability, where the British convention of ministerial responsibility was held to be qualitatively different from the divided responsibility associated with Washington, recent events have rendered more similar the actual practice of accountability for these chief executives. Viewed from one perspective, therefore, the operation of central government appears to be growing more similar. Yet

Rasmussen concludes, unlike other comparativists who have recommended transference of institutions from one country to the other, that successful changes in practice and institutional form must grow from internally generated forces. Although several developments in recent years happen to have drawn the two systems closer together, there is no certainty either that future developments will continue that process or that current trends will overcome the power of deeply ingrained political cultures to influence the form and style of systemic change.

The American "Innovation"

The last twenty years have seen considerable debate in both Britain and the United States about the scope of executive power. These debates have focused, however, on contrasting points in the political systems of the two countries. In the United States the concern for most of the period was whether an imperial presidency had come to dominate Congress and even threaten democracy.¹ Across the Atlantic the question was whether Britain had passed from cabinet government to prime ministerial government, that is, whether the Prime Minister had come to dominate the rest of the executive.² To be specific, in the United States the debate centered on legislative-executive relations, while in Britain it centered on intra-executive relations.

A primary reason for this contrast is the difference in political institutions between the two countries. Britain long has accepted the idea that the executive should dominate, or at least control, the legislature with the plural and collective nature of the executive relied upon to check arbitrary personal power. The United States, on the other hand, has accepted presidential domination of the executive and expected the separation of powers among distinct branches of government to check abuses of power. Briefly stated in historical perspective, the Prime Minister was more powerful than the President vis-à-vis the legislature, while the President was more powerful than the Prime Minister within the executive.

The common concern has been whether, despite the contrasting mechanisms relied upon, recent trends have tended in both countries to enervate the intrinsic checks on power. Interestingly, should such developments be occurring, the two systems would be converging. A growth in presidential power in relations with Congress would tend to produce legislative-executive relations more of the British type, while prime ministerial ascendancy within the cabinet would move

British government in the direction of the U.S. type of intra-executive relations.

That any such convergence should have been delayed for nearly two centuries after the drafting of the U.S. Constitution is ironic because the political leaders who gathered in Philadelphia really had not sought to create an innovative political system *de novo*. They had revolted against the colonies' subservient status and the substance of British government policy of that time rather than against the political system as such. They looked for guidance to such theorists as Locke and Montesquieu, both of whom regarded English government as a separation of powers system. Even as late as eighty years after the Constitutional Convention Walter Bagehot felt compelled to correct the erroneous belief that the English Constitution embodied such a system.³

Furthermore, the practical political experience of most of the political leaders of the newly independent nation tended to reinforce such an interpretation of the English system. The political system which the early colonists had brought with them was the English system, but the English system modified for a colonial setting. It included a colonial governor—a separate executive—whose tenure in office did not depend, any more than did that of the British monarch, whose agent he was, on the preferences of the colonial legislature.

Thus in creating the American separation of powers system the Founding Fathers were seeking to retain what they regarded as one of the best features of the English system and to adapt it to American circumstances. Despite these relatively limited objectives, the American and English systems did diverge in the nineteenth century. And before that century was out three leading political theorists—one English (Walter Bagehot), one Irish (James Bryce), and one American (Woodrow Wilson)—all argued at length that the Founding Fathers had botched the job: American political institutions, especially in the matter of relations between the executive and the legislative structures, were inferior to English ones.

Space does not permit quoting their charges in detail. Suffice it to say that the perceived failings of the American system were all-encompassing. Separation of powers produced less able leaders and government policies that were not only substantively less satisfactory, but which were implemented less effectively. Furthermore, it vitiated democracy by blurring responsibility and failing to educate the people politically. Thus on leadership, policy, and accountability the English parliamentary system was better.⁴

The Course of Institutional Divergence

The publication dates of these three critiques—Bagehot, 1867; then Wilson, 1885, and Bryce, 1888—neatly bracket the formative period of the British parliamentary system as we have known it for the last century. A brief summary of the key events of the period will help to clarify how the English and American systems diverged in practice.

In 1867 the Second Reform Bill nearly doubled the electorate to 2.5 million. The same year the Conservatives founded a party organization outside Parliament. In 1872 secret ballots were instituted. In 1877 the Liberals followed the Conservative lead and created a mass party organization. Between 1877 and 1882 the procedures of the House of Commons were altered significantly—closure, guillotine motions, and limits on the ability of MPs to delay action through emergency debates were introduced—so that for the first time the government had the advantage over individual members of Parliament.⁵ Bribing of electors was prohibited by the Corrupt Practices Act in 1883 and the following year the Third Reform Bill nearly doubled the electorate again to almost 6 million.

These changes eliminated the old style electoral management, which had survived the first installment of electoral reform in 1832. The huge growth of the electorate and the effective safeguards against corruption meant that voters no longer could be manipulated as individuals, but had to be appealed to as groups. The most effective appeal was one offering beneficial governmental action. Since individual MPs lacked the power to make good on such promises, like-minded ones needed to agree on programs having some elements in common to be offered to voters in constituencies throughout the country.

Parties had to agree not only on some form of electoral program, but also to remain sufficiently united in the Commons to have some hope of passing the necessary legislation. The growth during this period in disciplined partisan voting in the Commons was remarkable.⁶

Although the intervening one hundred years have seen both institutional and behavioral change in the British political system, its modern configuration was in place by 1885. Citing a specific similar date for the American political system is more difficult because not only were the key changes more scattered over time, but they also had opposed effects.

Procedural changes from 1877 to 1885 concerning appropriations bills contributed to the fractionalization of power in the House of

Representatives.⁷ The results of Speaker Thomas B. Reed's efforts to give some focus and direction to the shambles Congress had become amply supported Bryce's assertion that the Speaker of the House had more influence over legislation than did the President. Twenty years passed before the reaction to the "tyranny" of "Czar" Reed and his successors was sufficiently strong to swing the locus of power back in the other direction. Then from 1909 to 1911 another set of procedural reforms sharply curtailed the Speaker's power.⁸

These reforms did not produce a return to the previous chaos, however, because partisan organization of the House of Representatives in the form of the Democratic Caucus was established at the same time. Once two-thirds of the Democrats voted in caucus for a measure, all Democratic congressmen were bound to support the measure in the House unless they had made contrary pledges to their constituents during their election campaign.⁹ Woodrow Wilson, now President, doubtless was pleased with a development much in keeping with his prescription in *Congressional Government*. The American separation of powers system had come to function in practice much like the English parliamentary system.

These halcyon days were short-lived, however, as the Democratic party split over foreign policy. By 1918 "the binding party caucus had ceased to be an effective instrument in the hands of the leadership. The Republican minority, meanwhile, had all but abandoned use of the binding caucus in 1911 . . . by 1919, the House no longer was willing to accept the centralization of power that had developed" under previous Speakers and then had passed to the party caucus.¹⁰ Thus the American and British political systems diverged and Wilson suffered in full measure the trials of separation of powers.

Ironically, at almost the same time the first step toward strengthening the President was taken when the Bureau of the Budget was created in 1921 and the President was required to submit an annual budget message to Congress. The founding of the Executive Office of the President in 1939 provided even greater institutional support for this role as policy formulator and coordinator. This initiative was developed further immediately after World War II with the addition to the Executive Office of the National Security Council and the Council of Economic Advisers, along with obligating the President to prepare an annual economic report.

Finally, the period from 1970 to 1976 saw another set of significant reforms in congressional procedures "deemed necessary . . . for stricter accountability of members and for re-establishment of Con-