**CONTRASTS BETWEEN**

**THE AMERICAN AND BRITISH**

**POLITICAL SYSTEMS**

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**INTRODUCTION**

Elsewhere on this web site, I have outlined in some detail explanations of both the American political system [[click here](http://www.rogerdarlington.me.uk/Americanpoliticalsystem.html)] and the British political system [[click here](http://www.rogerdarlington.me.uk/Britishpoliticalsystem.html)]. As someone who is intensely interested in politics generally, and British and American politics most especially, I am fascinated by the many differences between the political scenes on the two sides of the Atlantic. Inevitably, I am oversimplifying somewhat, but the following differences strike me as instructive.

**THE CONSTITUTION**

* Perhaps the most fundamental difference between the American and British political systems is the constitution - or the lack of one. The United States has a written constitution as does the vast majority of nation states. The UK does not have a single document called the constitution but instead its constitutional provisions are scattered over various Acts of Parliament.
* The American constitution is hard to change and, in current political circumstances, perhaps impossible to change in any meaningful respect. The Equal Rights Amendment - which sought to provide equal rights for women - failed and there has been no succesful amendment of the US Constitution - except for one technical measure - since 1971. What for practical purposes constitutes the British Constitution - various Acts of Parliament - can be changed by a simple majority in the legislature. For instance, the current Coalition Government introduced fixed terms for the House fo Commons by passing the necessary legislation.
* In the United States, political discourse frequently makes reference to the constitution - typically Republicans arguing that Democratic initiatives are 'unconstitutional'. Besides the fact that the UK does not have a constitution as such, it is rare for British politicians to argue that the actions or proposals of their opponents are illegal or *ultra vires*.
* A defining feature of the American constitution is the strict separation of the powers of the executive, the legislature and the judiciary. The British political system has no such formal separation of the powers - indeed until recently one person was a member of all three arms of government, since the Lord Chancellor was a member of the Cabinet (the executive), a member of the House of Lords (the legislature) and the head of the legal system (the judiciary).
* In the United States, because of the separation of the powers, no Cabinet member is allowed to be a member of the Congress. In Britain, every Government Minister must be a member of one of the two Houses of Parliament and, if he or she is not already in the Parliament, he or she is made a peer.

**THE EXECUTIVE**

* The most obvious - and certainly the most visible - of the differences between the American and British political systems is that the USA is a presidential system, with the apex of power in a directly-elected President, whereas the UK is a parliamentary system, with the Prime Minister holding office and power only so long as he or she commands a majority of votes in the House of Commons.
* In theory then, the American President has much more power than the British Prime Minister - he is the commander-in-chief and has the power to issue executive orders which have the full force of law. However, the constitutional system of 'checks and balances' seriously circumscribes the power of the US President who often finds it really difficult to push legislation through Congress. By contrast, a British Prime Minister usually heads a government with a majority of seats in the House of Commons and the ability to pass almost any legislation that he wishes.
* In the United States, the transition period between the election of a new president and that person's inaugration is two and half months. In Britain, the changeover of Prime Ministers is virtually immediate - within hours of the election result, one person leaves 10 Downing Street and within the following hour the successor enters it.
* In the US, government is highly partisan with the President appointing to the executive colleagues who are almost exclusively from within his own party. In the UK, government is normally equally partisan with all Ministers coming from the governing party but, in 2010, exceptionally the Conservatives were required to go into a coalition with the Liberal Democrats and grant them 17 ministerial positions.
* In the United States, the incoming President and his aides make a total of around 7,000 political appointments. In Britain, the Prime Minister appoints around 100 members of the Government and members of the Cabinet each appoint a couple of Special Advisers, so the total number of political appointments is around 150.
* In the United States, all the most senior appointments are subject to confirmation hearings and votes in the Senate. In Britain, there is no procedural method of challenging the appointment of a particular Minister although, in theory, the Opposition could move a vote of no confidence in the appropriate House of Parliament.
* In the USA, the Secretary of State is (arguably) the most senior member of the Cabinet and in many countries would be known as the Foreign Secretary. In Britain, the political head of each Government Department is called Secretary of State and so almost every member of the Cabinet is a Secretary of State.
* In the United States, the incoming President's inaugural address is a highly public and prestigious affair. In Britain, the new Prime Minister simply sets out his or her vision for the country in a speech to the House of Commons on the subject of the Queen's Speech which opens the new session of Parliament.
* In the United States, the President each year gives a high-profile 'State of the Union Address'. In Britain, there is no equivalent occasion, the nearest event being the Prime Minister's introduction to the Government's legislative intentions for the next year or so after the State Opening of Parliament each session.
* As a result of the separation of the powers, the US President does not attend or address Congress except for the annual 'State of the Union Address'. Since there is no separation of the powesr in the UK system, the Prime Minister is a member of one of the Houses of Parliament - these days, invariably the House of Commons - and regularly addresses the Commons, most notably once a week for Prime Minister's Question Time (PMQ). When the President addresses Congress, he is given a respectful hearing. When the Prime Minister addresses Pariament, he is barracked and interrupted and Prime Minister's Question Time in particular is a gladitorial affair.

**THE LEGISLATURE**

* In the USA, both houses of the legislature - the Senate and the House of Representatives - are directly elected. In the UK, the House of Commons is directly elected, but the House of Lords is largely appointed (making it unique in the democratic world).
* In the States, as a consequence of the separation of the powers, all legislation is introduced by a member of Congress, so even the signature legislation attributed to President Obama on healthcare reform was actually introduced by a Congressman (Democratic member of the House of Representatives Charles Rangel). In total contrast, almost all legislation in Britain is introduced by the Government with only a very small number of Bills - usually on social issues with minimal implications for the public purse - introduced by individual Members of Parliament (they are called Private Members' Bills).
* Senate rules permit what is called a filibuster when a senator, or a series of senators, can speak for as long as they wish and on any topic they choose, unless a supermajority of three-fifths of the Senate (60 Senators, if all 100 seats are filled) brings debate to a close by invoking what is called cloture (taken from the French term for closure). There is no such filibustering provision in either House of the British Parliament.

**THE JUDICIARY**

* In America, the Supreme Court is an intensely political institution - its members are appointed by the President on a partisan basis and its decisions are often highly political and highly controversial. By contrast, in Britain the Supreme Court is not appointed on a political basis and, like all British courts, avoids making decisions which it regards as proper to politicians and Parliament.

**POLITICAL PARTIES**

* In the United States, the Democratic and Republican Parties absolutely dominate federal and state elections with independents securing only small proportions of the vote. In the United Kingdom, the two main political parties - Conservative and Labour - win a smaller and declining share of the total vote, with a growing share being taken by the likes of the Liberal Democrat Party and the UK Independence Party at national level and by the likes of the Scottish and Welsh Nationalist Parties at the devolved level.
* In American politics, the two main political parties are loose coalitions with individual candidates or Congressmen adopting varying positions on many issues (although, in recent years, the Tea Party movement has forced Republican politicians to proclaim more consistently conservative positions). In British politics, all political parties have much tighter rein on the policies promoted by candidates and the voting by elected representatives. (In the House of Commons, each week a 'whip' is issued which sets out how the Member of Parliament should vote on each major issue before the legislature that week).
* The major parties in the USA have a large-scale congress every four years to choose their candidate for the forthcoming presidential election and ostensibly determine the policy platform of that candidate. All the political parties in the UK hold annual conferences where they debate the policy positions to be adopted by the party, but these conferences do not choose the party leader (which is done through a separate and broader process varying from party to party).
* In illustrations and promotional material, the Democratic Party is often represented as a donkey, while the Republican Party is featured as an elephant - symbols that date back to the 1870s. British political parties regularly change their symbols and very few electors have any idea what they are.

**ELECTIONS AND CAMPAIGNS**

* In the USA, the term of a President, Senator or Congressman is known precisely as four years, six years and two years respectively and the dates of the elections are fixed. In the UK, the term of members of the House of Commons - and therefore of the Government - is legally a maximum of five years but traditionally a Prime Minister could call a general election whenever he or she wished and it has been considered 'cowardly' to wait the full five years and so the election has been more typically after around four years. However, the current Coalition Government has enacted legislation to provide for a fixed five-year term except for special circumstances.
* Candidates for the Presidency, the Senate and the House of Representatives - plus a host of other positions below federal level - in the US political system are chosen by a system of primaries in which (usually) all registered Democratic and Republican voters participate in the choice of the candidate for 'their' party in the main election. Britain does not have a system of primaries and the selection of candidates is normally confined to actual members of the relevant political party in the constituency in question.
* The filling of vacancies varies between and within the two political systems. The US Constitution states that special elections will be held to fill vacant Senate seats, but that state legislatures may empower the governor of the state to fill the seat by an appointment between the time that it becomes vacant and the time that the winner of the special election is certified. Most states allow the governors to pick the replacement who serves until the next general election when the voters decide who will serve the remainder of the term. Several states, however, require that a special election be held with the governor certifying the winner as the Senate member. By contrast, the Constitution requires that governors call special elections to fill a vacancy in the House of Representatives. They are usually held within three-six months of a vacancy because the entire election process must be followed: nominating conventions or primary elections plus a general election. In the UK, vacancies in the House of Commons are filled by a by-election in the relevant constituency which is usually held within three or four months. Since members of the House of Lords were not elected in the first place, there is no by-election when a peer resigns or dies.
* The American general election effectively lasts almost two years, starting with the declaration of candidates for the primaries. The British general election lasts around four weeks.
* American elections depend on vast sums to purchase broadcasting time. Parties and candidates in British elections cannot buy broadcasting time.
* As a consequence of the Supreme Court decision in the *Citizens United*case, effectively there are no limitations on expenditure in American political elections. There are statutory limitations on expenditure for all elections in the UK.
* In the States, almost 40 million television viewers watched the Convention speeches of Barack Obama and Sarah Palin in 2008. No party conference speech in Britain would attract more than a few million.
* American presidential candidates have been taking part in televised debates since 1960. British political leaders only agreed to televised debates for the first time in the General Election of 2010.
* The first televised debate between Barack Obama and Mitt Romney in 2012 attracted almost 70 million viewers. Even allowing for the difference in population, the televised debates between the British party leaders do not attract the same level of interest.
* In an American presidential election, turnout is typically around 50% (although in the 2008 election it was over 60%) and, in the case of mid-term Congressional elections, turnout typically falls to around 40%. In the UK, turnout in General Elections used to be around 75% but more recently has fallen to around 60%.
* In the USA, blue signifies states held by the Democratic Party, the more left-wing. In the UK, blue identifies the Conservative Party, the more right-wing.
* In the USA, red signifies states held by the Republican Party, the more right-wing. In the UK, red identifies the Labour Party, the more left-wing.
* In an American general election, the states that might go to one party or the other are known as 'swing states'. In a British general election, constituencies that might go to one party or another are called 'marginal constituencies' (where three parties are each in contention - which is not unknown - it is called 'a three-way marginal').
* American general elections are often so raw and vitriolic that candidates make spurious claims about themselves or their opponents that need to be analysed for the truth and whole web sites are devoted to fact checking. While British politicians are certainly not beyond exaggeration or obfuscation, they are rarely guilty of the blatant truth-twisting that one sadly sees in the US.

**STYLE OF POLITICS**

* In America, the term 'conservative' means really right-wing, especially on social issues. In Britain the name 'Conservative' means mainstream right-wing, especially on economic issues.
* In America, the term 'liberal' generally means quite left-wing. In Britain, the name 'Liberal' means broadly centrist.
* In the States, it is considered necessary for a politician to emphasize their patriotism. In Britain, it is assumed that anyone who wants to run for national office cares for his or her country.
* In the United States, the flag holds special place in the political heart of the nation, people sing to it while placing a hand over their heart, and many people would like to make burning it a criminal offence. In Britain the flag is rarely prominent at political events.
* In the United States, since 9/11 most politicians wear a pin depicting the stars and stripes. In Britain, no politician would wear a badge displaying the union jack.
* So many political speeches in the US include the phrase "my fellow Americans". In British political terminology, there is simply no equivalent phrase.
* In the States, virtually every political speech seems to mention God, especially in the final call "God bless America". In Britain, no politician mentions God and none would think of inviting Him to show a special preference for his or her nation state.
* In the US, politicians frequently refer to their position on social issues like abortion and homosexuality. A British politician would think it unnecessary and inappropriate to talk about such issues unless asked.
* In the US, politicians constantly talk about the problems and the aspirations of the middle class. In the UK, politicians tend to talk more about the needs of the working class. They mean something similar but the language is different because the perceptions are different. In America, the working class is seen as the poor and most citizens perceive themselves as middle-class or aspiring to be so. In Britain, the middle-class is seen as a comfortable minority with the majority of the population perceiving themselves as working class.
* Although taxes are never popular, the issue of taxation is much more emotive in American politics than in British (or European) politics and the terms of debate on taxation are much more hostile. The United States was born in a revolt against paying taxes and many Republicans are against any tax increases and believe that low taxation stimulates economic growth, whereas many British (and European) politicians see taxation as a social instrument as well as a fiscal one with the power to bring about redistribution in society.
* American political speeches do not tend to make much use of facts and figures (those of former President Clinton tend to be an exception) but appeal more to broad values which do not lend themselves to quantification. Many British political speeches focus on practical issues and use figures to highlight problems and make comparisons with the policies or the performance of one's opponents.
* In the States, there are currently some outstanding political speakers, led by Bill Clinton and Barack Obama. In Britain, there is no politician who can be so inspirational, although Tony Blair at his best came close (but he's gone). On the other hand, British politicians tend to be better debaters because of the more confrontational style of discussion in the House of Commons, especially Prime Minister's Questions.
* In US political theory and discourse, there is a notion called 'American exceptionalism'. There are several versions of this nebulous concept, perhaps the most common being that the United States has a special 'superiority' in the world because of its history, size, wealth and global dominance plus the 'sophistication' of its constitution and power of its values such as individualism, innovation and entrepreneurship. Many American politicians refer to the USA being "the greatest country on earth" or even "the greatest nation in history". Although Britain fairly recently ruled over the largest empire in world history and has other claims to 'greatness' - not least its political system and cultural reach - there is no concept in British political discourse which compares to 'American exceptionalism'.

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