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## Comparing and Contrasting Bicameralism in Britain and Pakistan: An Analysis

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### Abstract

*The parliamentary form of government is one of the systems to govern the states among many other systems that developed over the process of centuries, evolving from social contracts, customs to traditional linkages, reaching, finally, at modern state system. It can further be divided into single national parliament (Unicameral) and a system consisting of two houses (Bicameral). Having diverse systems of governance, every state is working to keep peace and stability and create a progressive society that can ultimately attain a better world to live in. Pakistan got its independence in 1947 and adopted the Westminster system of governance which Britain had attained after a process of centuries since the signing of Magna Carta on June 15, 1215. Pakistan has been in struggle since its inception for a viable system of governance starting from a constitution borrowed from the Government of India Act 1935 to its own constitution approved in 1973. It shifted from a unicameral system of government to a bicameral federal state system but still a lot more is required to attain a democratic form of government that can respond to the local challenges. Keeping the bicameral system of Britain in view, the present study is planned to compare it with that of Pakistan to create a better understanding of parliamentary system of both states.*

**Keywords:** Unicameral, Bicameral, Magna Carta, Parliamentary System, Britain - Pakistan

### Introduction

Governing a state in a manner that takes it to the road of prosperity is a challenging task that every ruling elite handles in the contemporary world, and for which they develop a system best suitable for that particular state. Monarchy, Oligarchy, Aristocracy, Totalitarianism, Communism, Socialism,

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Military Dictatorship, Theocracy, Democracy, etc., are the product of this process. All these systems have further variances that are created by the countries according to their requirements. For instance, democracy may consist of unicameral or bicameral systems. The bicameral parliamentary system is generally adopted by the countries that have a federal or unitary form of government having heterogeneous societies, regional variances, and multi-ethnic identities. At times, all these factors lead to adaptation of a bicameral form of government and, in other times, one of these factors lead towards it.

Federalism usually is considered as the best form of government for multi-ethnic societies<sup>1</sup> but it always carries a threat of dissolution into multiple independent states if the issues of federating units are not handled carefully giving them a sense of ownership, equality in rights, and freedom to grow.<sup>2</sup> A bicameral form of parliamentary system seems best for such countries. Here, generally, the membership of the lower house is based on the population while the upper house provides equal representation to all the federating units, and they have a sense of equal space in national decision making.<sup>3</sup> In essence, authority, power, working paradigm and domains of both the houses are different from each other. There is a huge debate over the importance of the creation of two houses. Many scholars such as Thomas Jefferson,<sup>4</sup> Alexis de Tocqueville<sup>5</sup>, and Charles-Louis de Montesquieu strongly supported a bicameral legislature, while representation theorists like John Stuart Mill were strong critics of this system believing it as an additional institution having little significance.<sup>6</sup>

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<sup>1</sup> Baogang He, "Democratization and Federalization in Asia" in *Federalism in Asia* by Baogang He, Brian Galligan and Takashi Inoguchi (eds.), (Massachusetts: Edward Elgar Publishing Limited, 2007), 1.

<sup>2</sup> Ibid, 11.

<sup>3</sup> David P. Baron, Daniel Diermeier and Pohan Fong, "A Dynamic Theory of Parliamentary Democracy," *Economic Theory* 49, no. 3 (2012): 703-738.

<sup>4</sup> William J. Bryan, "Jeffersonian Principles," *The North American Review* 168, no. 511 (June 1899): 670-678, available at <https://www.jstor.org/stable/25119200>.

<sup>5</sup> Alexis de Tocqueville, *Democracy in America*. Trans. Henry Reeve, (The Pennsylvania State University, 2002). Visit at <http://seas3.elte.hu/coursematerial/LojkoMiklos/Alexis-de-Tocqueville-Democracy-in-America.pdf>.

<sup>6</sup> Adrian Vatter, "Bicameralism and Policy Performance: The Effects of Cameral Structure in Comparative Perspective" in *The Journal of Legislative Studies* 11, no.2 (2005): 194-215, Available at <https://www.tandfonline.com/loi/fjls20>.

Britain initiated the bicameral system of government and now, roughly, 41% of the total states in the contemporary world have designed their state systems on bicameralism. They include Australia, Russia, Spain, Germany, Ireland, the Netherlands, Brazil, Canada, India, and the Czech Republic. The method of election or appointment, working processes, rights and authorities of the bicameral setup vary from country to country as each country has devised its own system keeping the local realities in mind.<sup>7</sup> It is not a given that the bicameral system is helpful for federations. It is equally appreciated in the unitary states to define local realities. In Britain and Ireland, bicameralism defines the class structure of these societies while the upper house of federal states like the USA,<sup>8</sup> Switzerland and many others represent the territorial units. Although there is no major difference between the class and territory based bicameral system, there are differences in party representation in upper and lower houses of the Parliaments, primarily, because of the difference of tenures of both the houses and electoral systems. Generally, the members of lower houses are elected under direct elections while the upper houses representing units or social classes are usually elected through indirect election.

In the bicameral legislative system, two tiers of legislation have mostly different organizations, rules of election of the members, and designated powers. Practically, having two houses provides a system of checks and balances in a country and prevents the lower house to have too many powers to legislate.<sup>9</sup>

Bicameralism is also a source of creating balance in federations among the federating units and in unitary system among different groups and social classes.<sup>10</sup> For example, in Britain bicameralism emerged to response to the differences among the social classes while in the US it arose to handle the issues among the federating units.<sup>11</sup> Same has been the case of Pakistan.

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<sup>7</sup> Ibid, 195. See Also Aminah Gilani, "An Analysis of Bicameralism as A Viable Legislative System in Pakistan," in *Journal of Political Science* (March 2021).

<sup>8</sup> Mariana Llanos and Detlef Nolte, "Bicameralism in the Americas: Around the Extremes of Symmetry and Incongruence," *Journal of Legislative Studies* 4, no. 3 (2003): 54-86.

<sup>9</sup> See John Gerring, Strom C. Thacker & Carola Moreno, "Are Parliamentary Systems Better?", at <https://www.bu.edu/sthacker/files/2012/01/Are-Parliamentary-Systems-Better.pdf>.

<sup>10</sup> Adrian Vatter, "Bicameralism and policy performance, 194-215.

<sup>11</sup> Bernard Burrows and Geoffrey Denton, *Devolution or Federalism? Options for a United Kingdom* (London: The Macmillan Press LTD., 1980).

The article compares the bicameral systems of Pakistan and Britain. Since Pakistan is a federal state and Britain has a unitary form of government, it may help to make a comparison of both. Furthermore, before the arrival of British in the region was under monarchical system of government; same was the case with Britain as it was also a monarchical state before gradually becoming a constitutionally monarchy. Since Britain introduced elections and parliamentary form of government in this region, the article intends to discuss the variations present in both the systems.

### **Salient features of Bicameralism in Pakistan**

The subcontinent has a long history of dynastic rule since antiquity. It was the British who introduced the system of government in the region initially than it is transformed into an elected government. In the early years of the British rule in the subcontinent, a very few members from the local population were added in the governing bodies and with a gradual process of rules share of local members in executive bodies was increased.

During the struggle for independence, the All-India Muslim League constantly raised the voice for creating a federation to address the issues of diversity in the country. The campaign for the 1946 elections also revolved around the slogan of federal form of government and the respect for heterogeneity, and the same was considered as the form of government for the newly created country i.e., Pakistan.

Until its constitution was formed, Pakistan adopted the Government of India Act 1935. Its first constitution was formed in 1956. Due to a huge distance between its eastern and western wing, all the provinces at the western wing were united under the title of "One Unit" and the unicameral form of government was adopted.<sup>12</sup> Democratic form of government could not last long and, in 1958, Pakistan faced its first Martial Law which lasted till 1962. From 1962 to 1969 a controlled democracy with a unicameral parliamentary system was implemented. A major change in the system happened after the elections of 1970 which culminated in the fall of Dacca.

After the loss of Eastern Wing critical decisions were taken to create a national assembly, consisting of the members elected from the western wing of the country. This assembly framed the constitution for Pakistan which

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<sup>12</sup> Visit at <https://na.gov.pk/en/content.php?id=75#:~:text=Under%20the%201973%20Constitution%2C%20Pakistan,the%20total%20strength%20to%202010.>

suggested a bicameral legislature in the country to address the issues of federating units and avoiding further chances of desertions of other provinces or the federating units. The unanimously approved constitution of Islamic Republic of Pakistan directed the creation of a Parliament in its Article 7,<sup>13</sup> which was explained as the 'Parliament must consist of President and two Houses named as Senate and the National Assembly in Article 50'.<sup>14</sup> Article 59, 60 and 61 provide details about election of Chairman, Deputy Chairman, and the pattern of working of the senate.<sup>15</sup>

This initiative was taken to address the insecurities of the provinces whose population was less in comparison with the Punjab. In the National Assembly, representation to the provinces is awarded on the basis of population, and, thus, to create a balance, all provinces were provided equal representation in the upper house.<sup>16</sup>

In the National Assembly Abdul Hafeez Pirzada explained the role and significance of the Senate:

Let us have Bicameral Legislature - two Houses of Parliament – In the Senate we will have equal representation and in the National Assembly there should be representation according to population. Senate should only have delaying powers; matters which are not federal in character, but have something to do with the provinces, should be decided in the event of difference of opinion between the Senate and the National Assembly by a joint sitting of parliament which would considerably dilute the minority of the National Assembly.<sup>17</sup>

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<sup>13</sup> National Assembly of Pakistan, *The Constitution of Islamic Republic of Pakistan: 1973* (Islamabad, Government of Pakistan), 6.

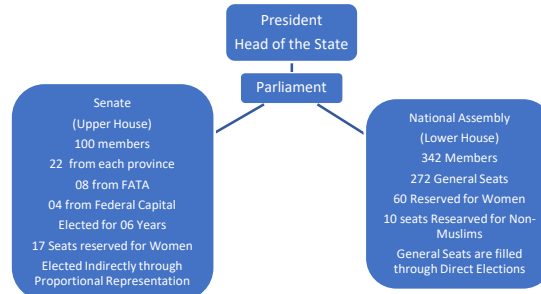
<sup>14</sup> Ibid, 25.

<sup>15</sup> Ibid, 31-33.

<sup>16</sup> "An Analysis of Bicameralism as A Viable Legislative System in Pakistan," in *Journal of Political Science XXXVIII* (2020).

<sup>17</sup> *The National Assembly of Pakistan (Constitution Making) Debate* (Vol. II) No. 1-11, February 17, 1973, 56.

### Federal structure of Pakistan



### Salient features of British Bicameral System

The British System consists of four constituent states; England, Northern Ireland, Scotland and Wales among which England generally remained dominant as compared to other constituting units which had been united through conquest or political union. The British system of governance revolved around a monarch. With the passage of time, a council got developed that used to advise the monarch. This royal council consisted of noblemen, ecclesiastics, and representatives of the counties. Later reforms converted this council to the British Parliament which further developed to a bicameral system of governance in the fourteenth century during the era of Edward III.

Initially, the council's responsibility was to approve the Crown's proposed taxes and, at times, the council used to demand solutions to the challenges faced by the common man before voting for taxes. Hence, it can be said that, initially, the council's job was to support the state in its taxation system that later on took the shape of legislative powers. The signing of "Magna Carta" in 1215 provided the basis for a democratic form of government in Britain. Before the year 1215, all the powers rested with the monarchy and the Church.<sup>18</sup> Initially, restricted rights were shared which kept on changing over the years.

In the year 1341, for the first-time a bicameral system emerged when Commons were separated from the nobility and the clergy.

<sup>18</sup> Visit at <https://www.britannica.com/topic/Magna-Carta>.

The House of Commons is the lower house of the British parliament which is a dominant branch among the two houses. It comprises of 650 members who are elected through the first-past-the-post system. The single winner voting method is the “plurality system”. It also called “first-past-the-post”, ‘relative majority’, or ‘winner-take-all’.<sup>19</sup> It is evident that only those countries that had been under the political influence of the British: Commonwealth Countries, United States and Britain herself are using the Plurality System for election of the legislatures with only a few exceptions like Sri Lanka that is using the list system. Plurality system is linked with the territorial representation which mainly represents communities.<sup>20</sup>

The plurality voting system is a single-winner voting system. It is often used to elect executive officers or to elect members of a legislative assembly which is based on single-member constituencies. Under this system, to get a majority vote is not compulsory for the winning candidate. He only requires getting more votes than his opponents.<sup>21</sup>

As per law, the House of Commons works for five years but can be dissolved under certain circumstances. The Prime Minister and major chunk of cabinet members are elected from the House of Commons. MPs consider and propose new laws and have the right to scrutinize government policies for which they can question ministers about current issues either in the Commons Chamber or in the Committees.

At first, the House of Commons was far less powerful in comparison with the House of Lords but the system which evolved over the centuries has changed the working balance between the two Houses. The House of Commons gained more powers under the Parliament Act of 1911 and the powers of the House of Lords were reduced from having the right to reject a law to just delay it. The Parliamentary decisions made the government answerable to the House of Commons and the tenure of the Prime Minister is only intact if he enjoys the confidence of the House of Commons.

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<sup>19</sup> Kelly Shuttleworth, “Electoral Systems across the UK: The Devolved Legislatures are Elected using Different Voting Systems to the First-Past-The-Post System,” 27 February 2020. Visit at <https://www.instituteforgovernment.org.uk/explainer/electoral-systems-across-uk>.

<sup>20</sup> Vernon Bogdanor & David Butler, *Democracy and Elections: Electoral Systems and their Political Consequences* (Cambridge: Cambridge University Press, 1983), 2.

<sup>21</sup> Association of Secretaries General of Parliaments, *Constitutional and Parliamentary Information* (Association of Secretaries General of Parliaments, 1990).

In the beginning, the women did not have the right to vote but with the passage of time women not only got the right to vote but also constituted more than 20% of the members of House of Commons. These women reached this forum through direct elections. Over the process of centuries, the MPs began to be seen more reflective to those they represent.<sup>22</sup> The House of Commons' primary responsibility is to debate about the contemporary issues and challenges and enact laws for which multiple committees are constituted. These committees review the situation and details of new laws, their impact, and implications before getting them approved.

"Parliament originates in the Witan – an Anglo-Saxon political body made up of councils consulted by Saxon kings and attended by religious leaders, magnates and the king's ministers".<sup>23</sup>

The House of Lords is the Upper House of the British parliament. Initially it consisted of representatives of counties, cities, and boroughs. With the passage of time, its base of representation or membership extended. Membership of the House of Lords was mainly hereditary in nature. These representatives are divided in the ranks of duke, marquess, earl, viscount, and baron.<sup>24</sup> This membership did not remain consistent as the membership count and status fluctuated according to the contemporary requirements. It has an independent structure and stature and complements the work of the House of Commons. The Lords not only play its role in enacting laws, but it also keeps an eye on the work of government and can challenge any decision of the government if it finds against the state of its people.

### The Structure of Government in the United Kingdom

#### The European Union (78 UK MEPs)

<b>Supra-national</b>	<b>64 MEPs</b>	<b>4MEPs</b>	<b>7MEPs</b>	<b>3MEPs</b>
	The Council of the Isles			
<b>National</b>	North-South Ministerial Council			
	<b>The House of Lords (approx. 750)</b>			
	<b>The Government of the United Kingdom</b>			
	<b>The House of Commons 650 MPs</b>			
	<b>529 MPs</b>	<b>40 MPs</b>	<b>59 MPs</b>	<b>18 MPs</b>

<sup>22</sup> Visit at <https://www.parliament.uk/business/publications/research/key-issues-for-the-new-parliament/the-new-parliament/characteristics-of-the-new-house-of-commons/>.

<sup>23</sup> <https://www.parliament.uk/business/lords/lords-history/history-of-the-lords/>.

<sup>24</sup> Ibid.





**Electoral Process of Upper and Lower Houses of Britain and Pakistan**

Elections and pattern of elections play a vital role in modern democracy, particularly the Westminster system which defines pattern of peoples' participation in elections and their role in the post-election scenario.

Britain is the country which began the tradition of voting for government formation. Initially, a House of Lords emerged in the governance scenario of Britain which got divided into two: the House of Lords and the House of Commons. The pattern of membership for both the Houses is different. Members of the House of Lords are called Peers and they get membership on the hereditary basis, on the basis of affiliation with the Church or their status in their respective Counties. Contrary to that Members of House of Commons are known as Members of Parliament (MPs) and they are elected through a process of election based on adult franchise. In Britain, voters do not poll vote for a single candidate, instead they vote for a list of candidates nominated by a party or a group. The whole country is divided into constituencies and a candidate getting majority votes in a constituency wins the election and becomes member of the parliament (House of Commons) for five years or the time of working of that Assembly. The new elections can be called at the request of the Prime Minister to the Monarch, or if the ruling party loses the confidence of the majority and no alternative government can be formed within the House. Early elections cannot be called on the request of any individual, it is only possible through a vote of 2/3 majority of the House of Commons. Initially, there was no provision to recall MPs but in the post-2010 scenario, parliament has considered devising some rules to recall MPs on the question of extra expenditures on the campaign. Since 1928, every individual reaching the age of twenty-five could use the right to vote, which was reduced to sixteen in 1970. Provisions for compulsory voting are under consideration to increase the public interest in the electoral process but no legislation has been done till date in this regard.

Senate of Pakistan is the upper house which is symbol of the federation. Pakistan started as a unicameral parliamentary democracy but in 1970 incident of fall of Dhaka raised questions about the practicality of the existing system.<sup>25</sup> The Senate elections take place in accordance with Article 59 of the Constitution on the basis of proportional representation by means of

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<sup>25</sup> CIDOB, *Political System and State Structure of Pakistan* (CIDOB International Yearbook 2012).

single transferable vote system.<sup>26</sup> All the four provincial assemblies serve as the electoral college for the election of the members of the Senate from their respective provinces to elect twenty three members from their respective provinces comprising of fourteen general seats, four seats reserved for women, four technocrats including Ulema, and one seat reserved for non-Muslims. The federal capital is represented by four members i.e., two general seats, one technocrat including Aalim and one woman. Any individual of more than thirty years of age can contest the election for Senate from a province or area where he is registered as a voter and meets the qualifications defined in Article 62 of the Constitution of Pakistan.<sup>27</sup>

The lower house or the National Assembly is the constituent assembly of Pakistan which is elected through the majority system based on universal adult franchise. Initially, every Pakistani citizen after attaining the age of 21 years could vote which was amended and the age for right to vote was prescribed as 18 years during Musharraf era. For the elections of national assembly, the whole country is divided into constituencies where individuals can contest elections as independent candidates or through getting affiliation with any of the political parties. Since Pakistan's political system is based on the multi-party system, most of the time two or more political parties form coalitions to form a government. Being coalition governments, most of the parties could not survive to complete their tenures and the system faced dissolution of governments by the head of the state. For example, the assemblies faced dissolution before completing their tenure in 1988, 1990, 1993 and 1996. With the passage of time, the rules of business and laws to run the state system are amended which resulted in the in-house changes of governments in post eighteenth amendment scenario.

### **Composition of the Upper Houses of Britain and Pakistan**

In Pakistan, initially, the Senate (upper house) consisted of forty-five members which was raised to 63 in the year 1977 and to 87 in 1985.<sup>28</sup> General Pervez Musharraf through a Legal Framework Order (LFO), 2002 raised the membership of the Senate from 87 to 100. This number was

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<sup>26</sup> Election Commission of Pakistan, *Senate Elections 2018* (Islamabad, Election Commission of Pakistan, 2018).

<sup>27</sup> Senate of Pakistan, *Rules of Procedure and Conduct of Business in the Senate 2012 as Amended upto 2020* (Islamabad, Government of Pakistan, 2020).

<sup>28</sup> National Assembly of Pakistan, *The Constitution of Islamic Republic of Pakistan: 1973* (Islamabad, Government of Pakistan).

increased to 104 by adding four minority reserved seats during the era of Asif Ali Zardari through the 18th amendment in 2011. The Twenty-Fifth Amendment of the constitution decreased this number to 100 with the removal of FATA reserved seats after its merger with KP.<sup>29</sup> The members of the Senate are elected through an indirect election; elected by each provincial assembly to represent their respective provinces.<sup>30</sup>

There is no defined number for peers in the House of Lords, at one time it reached at the number 788. The number of peers in the House of Lords fluctuates because of death, retirements, or new appointments. Initially, a major number of peers consisted of hereditary members but over the centuries the system reformed. Presently, a major number of peers in the House of Lords are appointed. These appointments are based on party affiliations generally by the party leaders and vetted by the House of Lords' independent Appointments Commission. Some suggestions can even be forwarded by the members of the public or political parties as non-party-political peers which are reviewed by the Appointments Commission. The commission forwards recommended lists to the Prime Minister for a final selection. At the maximum, 92 hereditary peers (where eligibility for a seat in the Lords is passed down through a family) and 26 bishops and archbishops of the Church of England can get membership as the peers of House of Lords.<sup>31</sup>

### **Composition of the Lower Houses of Britain and Pakistan**

The National Assembly or the lower house in Pakistan is the directly elected assembly through general vote following the principle of adult franchise from the constituencies divided on the basis of population. The first constituent assembly of Pakistan was elected in the elections of 1946 through an indirect election. This practice continued till the imposition of first martial law in 1958. Till 1962 the state was run by General Ayub Khan who introduced the system of basic democracies and a presidential system which ended with his resignation. After the first general election in 1970,

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<sup>29</sup> Visit at [https://senate.gov.pk/uploads/documents/Constitution%20of%20Pakistan%20\(25th%20amendment%20incorporated\).pdf](https://senate.gov.pk/uploads/documents/Constitution%20of%20Pakistan%20(25th%20amendment%20incorporated).pdf). p. 149. Out of 8 FATA member 4 have completed their term and remaining 4 will get their term complete in 2024 and after that there will be no FATA seats in the Senate of Pakistan.

<sup>30</sup> See official website: <https://senate.gov.pk/en/essence.php?id=10&catid=4&subcatid=138&leftcatid=125&cattitle>About%20the%20Senate>.

<sup>31</sup> [https://www.ucl.ac.uk/constitution-unit/sites/constitution\\_unit/files/briefing\\_paper-house\\_of\\_lords.pdf](https://www.ucl.ac.uk/constitution-unit/sites/constitution_unit/files/briefing_paper-house_of_lords.pdf).

first elected national assembly took the oath and framed constitution for Pakistan which was unanimously approved.

Initially, the general seats of the National Assembly were 200 with 10 reserved seats women, making the total number of MNAs 210.<sup>32</sup> A Presidential Order of 1985 added seven seats to the general seats and reserved 10 seats for women in the National Assembly. Furthermore, ten seats were reserved for the religious minorities to be filled through separate electorate taking the total of 237 representatives of people in the lower house.<sup>33</sup> Presently, the National Assembly consists of 272 general seats, 60 seats reserved for women and 10 for non-Muslims which makes it a total of 342.<sup>34</sup>

Since Britain is not a federal state, so local government bodies are dependent on the House of Commons for their working which keeps it engaged to fulfill its responsibilities. Having a huge number of members, it meets for almost 170 days a year during which it has to spend roughly 43 hours of plenary business weekly. It also has to give many hours to committee meetings and discussions. The members of the House of Commons are elected through a majority vote in their constituency and the party which wins majority seats forms government. The 13th and 14th centuries were the initial phases of development of the House of Commons. In the year 1707, it had a political union with Scotland, and, in 1800, Ireland was added into the union. The total number of its members is 650.

### **Comparison of Bicameral Systems of Britain and Pakistan**

While comparing the role, powers and significance of bicameral legislature of Pakistan, it is apparent that the primary role and the major powers are enjoyed by the National Assembly of Pakistan while in many cases Senate has just a ceremonial role. Although the Senate is a symbol of federation, the power to elect and remove the cabinet lies with the National Assembly and the cabinet is responsible to the National Assembly. Approving the budget and initiating the constitutional amendments are also handled by the National Assembly. Although the electoral college for the president consists of the members of Senate, National Assembly, and all the four provincial

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<sup>32</sup> <https://na.gov.pk/en/content.php?id=75#:~:text=Under%20the%201973%20Constitution%2C%20Pakistan,the%20total%20strength%20to%20210.>

<sup>33</sup> Ibid.

<sup>34</sup> Visit at <https://na.gov.pk/en/composition.php>.

assemblies, it is worth noting that according to the original constitution of Pakistan, President just have nominal powers while the Prime Minister, which is executive head of the state, is elected by the National Assembly.

Initially, the powers of the Senate were limited. At the time of its creation, the members of the National Assembly wanted to make it a powerful institution, considering it as a 'Symbol of Federation' and protector of the rights of federating units. The then Minister for Law explained it as just the beginning and its powers could be enhanced with the passage of time through constitutional amendments to meet the aspirations of the federating units.<sup>35</sup>

It is important to note that federation can only work positively when both the chambers work in cooperation with each other. For example, the Senate passed the ninth and the eleventh Constitutional Amendments on its own, but it could not become part of the constitution without the approval of the National assembly. The same happened to the fifteenth constitutional amendment which could not get approval of the Senate and, therefore, lapsed.<sup>36</sup>

With the 18<sup>th</sup> Constitutional Amendment and some proceeding developments, the powers of the Senate have been enhanced. The Prime Minister and his cabinet have been made responsible to the Senate. It is further decided that the report of the Auditor General of Pakistan about the federation's accounts would be laid before the Senate. Furthermore, the NFC Award and some other important institutions were made responsible to the Senate. With such important developments the Upper House of the state has been strengthened at certain level.<sup>37</sup> After a long struggle, the composition of Public Accounts Committee (PAC) has also amended and members of Senate are given representation in the Committee.<sup>38</sup> This is how senate has got some voice in the financial matters. Having a clause to call a joint session for matters of national importance is also important to enhance

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<sup>35</sup> Roles and Powers of Senate of Pakistan, (Islamabad: Senate of Pakistan), <https://senate.gov.pk/uploads/documents/5.%20Role%20and%20Power%20of%20Senate.pdf>.

<sup>36</sup> Visit at <https://na.gov.pk/en/content.php?id=75#:~:text=Under%20the%201973%20Constitution%2C%20Pakistan,the%20total%20strength%20to%20210>.

<sup>37</sup> Roles and Powers of Senate of Pakistan.

<sup>38</sup> Ibid.

the role of the Senate and decrease the insecurities of the federating units but still a lot more is needed to create a true federation.

The UK is the powerful country of the England, Scotland, Northern Ireland, and Wales. The British Government works for the English monarch i.e., the Queen and all other three are connected with the English laws. At the same time, all the three have their own governing bodies to manage their local/regional issues. Although all the three states do not enjoy equal freedom as Scotland is comparatively more independent country particularly in the sphere of politics which has 56 seats in the House of Commons. Major legislative work is done in the parliament but the Scotland, Northern Ireland, and Wales have their own constitution making bodies that can manage the issues of local significance.<sup>39</sup> The constitution can be amended by the simple majority vote of the parliament which finally needs approval of the monarch as in other democracies particularly in Pakistan is done by the president.<sup>40</sup>

While comparing the bicameral system of the British and Pakistan, it is clear that hardly any thing seems common between the two. Pakistan has a federal form of government having provinces which belong to different ethnicities, different historical lineage and at certain level of conflicting burdens. Contrary to that, the British has a unitary form of government in which monarchy is still present although its role has become limited over the years. In Pakistan, the Senate, Upper House of the parliament is indirectly elected by the members of the provincial assemblies while in the British parliament Upper House represents a social class which holds a upper hand on the common man and general social divisions.

In Pakistan, the members of lower house are elected on the basis on adult franchise using majoritarian form of election, while in Britain the electoral system for the members of lower house is based on first-past-the post system. The role of upper chamber is generally of the second opinion on the bills, although with the constitutional amendments, this role has been extended and made more effective in Pakistan. While comparing both the parliaments, it can be said that perhaps there is hardly anything common in the practices of both the parliamentary systems except that the modern democratic system was introduced by the British in this region named South Asia.

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<sup>39</sup> F. W. Maitland, *The Constitutional History of England: A Course of Lectures Delivered* (Oxford: New College Oxford, 1908).

<sup>40</sup> *A Framework for Reviewing the UK Constitution* (Cambridge: Bennett Institute for Public Policy, 2022).