

# Westminster Model or Westminster Muddle? A Term in Search of a Meaning

Paper to 12th Workshop of Parliamentary Scholars and Parliamentarians  
Wroxton College, Oxfordshire, 25-26 July 2015

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## Abstract

*Those working in parliamentary studies will be well acquainted with the term Westminster model', which continues to be widely used in both the academic and practitioner literature. But closer examination of this term suggests significant confusion about its meaning. It began as a descriptor for the UK political system, and gradually developed a broader meaning in comparative politics, to include a 'family' of Westminster model countries. More recently it has become associated with Arend Lijphart's widely cited work which uses the model as an ideal type, representing centralised, majoritarian government. In this paper we follow Giovanni Sartori's advice for 'reconstructing' a social science term whose meaning may be unclear, by reviewing its use in the recent literature. We find that many authors use the term without definition, while those who do provide definitions suggest a large (and sometimes conflicting) set of attributes associated with the model, and a set of countries which frequently do not demonstrate these attributes. Some authors have suggested variants such as "Washminster" or "Eastminster" in order to reflect this diversity, while others have suggested that the term should be seen as a 'family resemblance' rather than a classical social science concept. But our analysis suggests that the term no longer meets even the - relatively weak - requirements for family resemblance. We therefore suggest that, far from being a model, the term simply induces muddle - and it is therefore time for it to be retired.*

## Introduction

Most of those working in legislative studies, and many working more broadly in the field of politics, will be familiar with the term 'Westminster model', which appears frequently both in the academic and practitioner literature. But to what extent is there consistency in its application? If the term 'Westminster model' is put under the microscope, can we actually be sure what it means? And if not, does it really serve any useful function? Far from being a 'model' in legislative studies in any true sense, might its primary function be to induce 'muddle' instead?

These are the questions addressed in our paper, which is based on analysis of uses of the term 'Westminster model' and its equivalents in the academic literature since 1999, when it notably featured in the second edition of Arend Lijphart's widely-cited book. We find that, while the term frequently occurs in the literature, it is often unclear how authors interpret it, and it quite commonly appears without any definition at all. Where definitions are given they are often partial, divergent, and even mutually contradictory. A dominant interpretation of the term - akin to Lijphart's (1999) majoritarian democracy - could probably be said to exist, but this could be defined far more parsimoniously and with much reduced risks of confusion. We thus propose that use of the term 'Westminster model' should be abandoned in comparative politics, and more precise terms put in its place.

The paper proceeds as follows. First, we explain our starting point - in terms of the roots and general uses of the term 'Westminster model' - and review the literature on concept formation in political

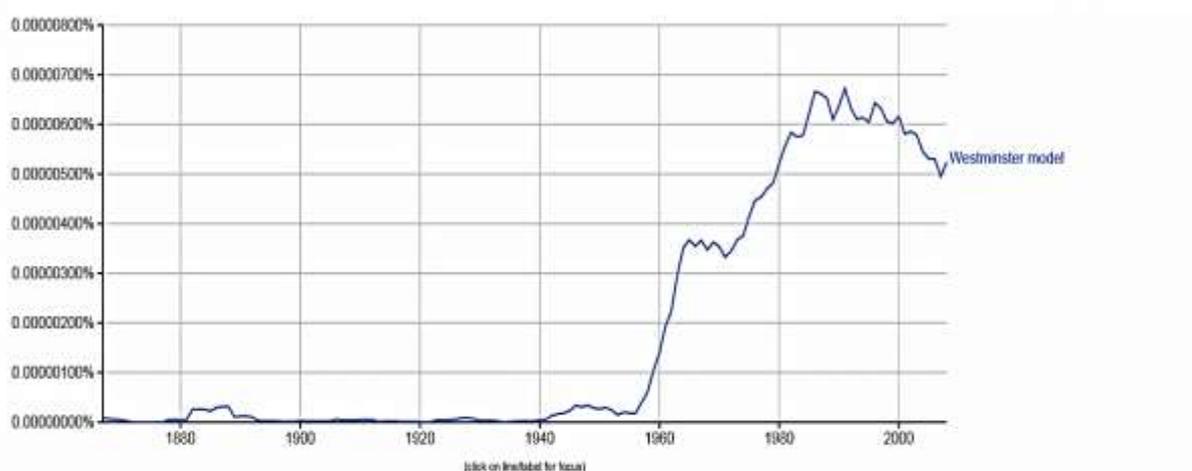
science, to consider what expectations we should have of a useful political science term. Next, we briefly outline our methods. The substantive part of the paper is then structured around three key questions. First, to what extent does the academic literature define the Westminster model at all? Second, where the term is defined, what do authors suggest that it means and how much consistency is there between these definitions? Third, having determined (as far as is possible) what the Westminster model is thought to mean, where can it be considered to exist? Here we review the attributes of countries commonly cited in the literature, but also other countries displaying attributes associated with the model. Finally, we review our findings. We conclude that the Westminster model does not even meet the relatively weak requirements of a 'family resemblance' concept, and thus its use in comparative politics risks confusing more than it illuminates.

## Context

The term 'Westminster model' will be familiar to most who work in political science, and likewise to many legislative practitioners. Linked by various authors to Walter Bagehot's (2001[1867]) exposition of the 'English' constitution (e.g. Rhodes, Wanna and Weller 2009) it did not actually appear in his text, but served – at least initially – as a convenient label for the system that he described. Over time it came to be used increasingly in a comparative context to describe countries influenced by the British system, and is now often used to link a set of 'Westminster model countries', 'Westminster democracies', or indeed members of a 'Westminster family'.

Yet a superficial reading of recent literature – of both an academic and a practitioner kind – suggests at least some confusion about what the term actually means. The Oxford English Dictionary offers little clue: the term 'Westminster model' appears only once, within the more generic entry for 'Westminster', citing a classic text by De Smith (1961) on 'Westminster's export models'. There is no implication that this is its earliest use; though a search of Google books since Bagehot's text was published shows that references to the term did indeed grow sharply in the early 1960s (Figure 1). De Smith (1961: 3) himself took care to point out that '[t]he Westminster model will never be a legal term of art, and the political scientist may wish to handle it circumspectly'. But this clearly did little to discourage its subsequent popularity.

Figure 1: Occurrence of the term 'Westminster model' in English language texts published 1867 – 2008 and captured on Google books



Source: Google Books Ngram Viewer (<http://books.google.com/ngrams>), generated 6 July 2015.<sup>1</sup>

More recently the Westminster model idea received a boost through the attention of comparativist Arend Lijphart, at a time when (Figure 1 suggests) its fortunes might have otherwise been flagging. Lijphart's now classic comparative text *Democracies* (1984, with over 3000 citations on Google scholar), and its later revision as *Patterns of Democracy* (1999, approaching 7000 citations), proposed the distinction between two ideal types, of 'majoritarian democracies' on the one hand versus 'consensus democracies' on the other. Throughout both texts, Lijphart uses the term 'majoritarian democracy' interchangeably with 'Westminster model', and he cites Britain as 'both the original and the best-known example of this model' (1999: 9). As will be familiar to many readers, his system is based on 10 indicators: five on the 'executive-parties' dimension (e.g. electoral system, party system, presence or absence of coalition government) and the others on the 'federal-unitary' dimension (e.g. degree of territorial decentralisation and presence or absence of bicameralism). In some respects this added a degree of precision to what was previously a rather loose term, but on the other hand - at Lijphart's own admission - these ideal types did not precisely apply in any country. Most notably, unicameralism was considered one facet of majoritarian democracy, while Britain has a bicameral parliament (though Lijphart judged the House of Lords to be weak).

Other authors have recently given some attention to the disparate meanings of the Westminster model in a comparative context. Most notably Patapan, Wanna and Weller (2005), and Rhodes, Wanna and Weller (2009) have explored 'Westminster legacies', particularly in Asia and the Pacific region. Their review of various texts from De Smith to 2002 (summarised in Rhodes, Wanna and Weller 2009: 8) concludes that the term encompasses various constitutional features and beliefs, and has various functions: serving for example as an 'institutional category', 'legitimizing tradition' or 'political tool'. They explicitly rule out developing 'a set of institutions that can be established as an ideal model, against which the degrees of deviance [from the model] can be calculated for each country', considering this 'possible but... rather sterile' (ibid: 224). Patapan, Wanna and Weller (2005: 2) likewise 'reject the notion of an idealised Westminster model as of limited analytical value', instead suggesting that the 'Westminster model... provides a set of beliefs and a shared inheritance'. Despite the lack of precision in its definition, these authors - like many others - continue to use the term to frame their work.

But this seems problematic. If a term in frequent use in the comparative politics literature has unclear or multiple meanings, this can surely only serve to confuse. In recent years other such terms have been put under the microscope. For example, Judge (2003: 501) questioned the utility of the term legislative 'institutionalisation', arguing that on examination of the literature 'there is little agreement as to exactly what its defining core characteristics are'. More recently Cheibub, Elkins and Ginsburg (2014) used data from the Comparative Constitutions Project to challenge assumptions about the package of attributes commonly associated with presidentialism and parliamentarism. What links these exercises is a combination of rigorous analysis of concepts with at least some use of empirical data. The Westminster model seems long overdue such a test.

The starting point for many in considering concepts in comparative political analysis is the classic text by Sartori (1970), which introduced the notions of conceptual 'travelling' (across time and space), and conceptual 'stretching' (i.e. to enable a concept to remain relevant to increasingly disparate cases). Connectedly, Sartori highlighted the relationship between the 'extension' of a term (to different cases), and its 'intension', defined as the 'collection of *properties* which determine the things to which the [term] applies' (1970: 1041, quoting Salmon 1963, italics in original). These are often likely to be in conflict: extending the use of a term more widely means that its intension will come under strain. Sartori's suggestion was that conceptual stretching could be avoided by travelling up his well-known 'ladder of abstraction', to instead deploy a more general concept. In colloquial terms, for example, rather than stretching the category 'fish' to include octopus and squid it might be better to use the more general category 'sea-dwelling creatures' instead.

In later work, Sartori made proposals for rigorous testing of concepts, and in particular for 'reconstruction' of categories whose meaning had become unclear. He suggested that '[c]oncept reconstruction is a highly needed therapy for the current state of chaos of most social sciences' (2009 [1984]: 122). He proposed a three stage process to achieve this: 'first collect a representative set of definitions; second, extract their characteristics; and third, construct matrices that organize such characteristics meaningfully' (ibid: 116). Hence the key is 'reconstructing a concept *from its literature*' (ibid: 121, italics in original). We take our cue from this suggestion.

But before turning to the analysis, it is important to note that scholars emphasise how not all concepts are equal, and some require more parsimonious definition than others. Sartori is seen as interested in 'classical categorization, in which the relation among categories is understood in terms of a taxonomic hierarchy of successively more general categories' (Collier and Mahon 1993: 145). A widely noted alternative to this is the 'family resemblance' idea. Here, cases share a set of properties, but not all cases may share them all. As articulated by Goertz (2006: 36), whereas a classical category requires members to share  $n$  attributes, 'the family resemblance rule almost always takes the form of " $m$  of  $n$ ". Given the notion of a 'Westminster family', this logic might seem applicable to the Westminster model. Indeed some authors (e.g. Patapan, Wanna and Weller 2005) suggest that this may be the case.

## Methods and data

Given the centrality of the term 'Westminster model' in Lijphart's 1999 book, and the obvious need to delimit our dataset, we began our search for meaning through an analysis of the academic literature starting at this point (and ending in March 2015). In line with Sartori's suggestion, our aim was to canvas the recent history of the concept by a close analysis of its occurrence in the literature.

Our search was largely based on academic bibliographic databases. We began with the Scopus database, using the search terms 'Westminster model', 'Westminster system', 'Westminster democracy' and 'Westminster parliamentary democracy' within the abstract, keywords, or title, or the single word 'Westminster' within the title. This found 154 items, of which 60 were excluded as largely irrelevant - because they discussed topics largely unrelated to political science, because they used the term Westminster purely literally (e.g. articles on the Westminster parliament, or referring to it, which included no mention within the main body of any such 'model', 'system', etc), or because they were not substantive articles (e.g. book reviews). A similar search was then conducted in the JSTOR database, excluding similar irrelevant items and any duplicates, which resulted in 20 further relevant texts. Repeating this process in Google scholar then found 86 further texts.

In addition, we conducted traditional (non-online) library searches for the use of the same in obviously relevant books. Using reading lists from leading universities we identified eight widely-used comparative politics textbooks and eight similar British politics textbooks.<sup>2</sup> We also included 14 mainstream texts available in the British Library on the parliaments and political systems in countries where our later analysis suggested the Westminster model might be considered to apply<sup>3</sup>. This amounted to 30 books in total, bringing our complete dataset to 230 items. Of these, 89 were texts broadly in comparative politics, 65 focused exclusively on British politics, and the remaining 76 were single country studies focused on countries other than the UK.<sup>4</sup> Four books are excluded from our subsequent analysis, as they included no relevant term. It is the comparative and non-UK texts that interest us most here, but the UK-related texts are clearly also important in establishing public understandings of the term.

## To what extent is the Westminster model defined?

Our first task was to search these texts to uncover whether they defined the Westminster model (or the meaning of a 'Westminster system', or 'Westminster [parliamentary] democracy', respectively). A definition was taken to be an explicit statement describing what the author in question considered to be the meaning of the term. The results of this analysis are shown in Table 1.

Table 1: Types of definition of the Westminster model, by scope of publication

Type of definition	Comparative		Single country case study		UK		Total	
	N	%	N	%	N	%	N	%
<b>No definition</b>	15	17%	9	12%	6	10%	30	13%
<b>Implicit</b>	33	38%	38	50%	14	22%	85	38%
<b>Partial definition</b>	17	20%	14	18%	13	21%	44	19%
<b>Full definition</b>	22	25%	15	20%	30	47%	67	30%
<b>Total</b>	87	100%	76	100%	63	100%	<b>226</b>	<b>100%</b>

We assigned each text to one of four categories, according to whether it contained an explicit definition, and how complete any such definition was.<sup>5</sup> Only the last two categories ('partial' and 'full') can really be considered a definition in the true sense: that is, an explicit statement of meaning associated with the term. Combining these two categories of 'true' definitions accounted for almost exactly half of the texts - 112 of the 226 containing a relevant term. The other half thus fell short of providing a clear statement of meaning - either not defining the term at all, or simply mentioning it in combination with certain attributes or consequences, without clear indication of whether these were central or peripheral, essential or non-essential to its meaning. Explicit definitions were more common in UK-focused studies (68%) compared to comparative studies (45%) and texts dealing with other single country cases (38%).

The lack of clear definitions in many of the non-UK texts suggests that the Westminster model is frequently assumed to have a meaning that is well-understood. Perhaps the most surprising group of texts were those that offered absolutely no definition at all. So for example one article offered 'A Framework for Evaluating the Performance of Committees in Westminster Parliaments', but the only clue as to what a 'Westminster parliament' might be was the fact that the article focused on Britain and Australia (Monk 2010). Other authors discussed 'three Westminster parliamentary democracies, Australia, Canada and New Zealand', with the only expansion regarding what might unite them being that these were 'Westminster-derived judicial systems' (Kerby and Banfield 2014: 342).

More common were cases where some attributes or consequences of the Westminster model were mentioned in the text, but without any explicit indication that these contributed to its definition. As we will discuss further in the next section, the attributes mentioned in this context were quite diverse. So for example Hopkin and Bradbury (2006: 143) suggested that 'the "Westminster model" of majoritarian party competition has traditionally placed a premium on party cohesion', while Hix and Noury (2011: 8) agreed that 'the Westminster model assumes that parties can enforce legislative cohesion'. Aucoin (2012: 177) in contrast noted that a 'public service staffed independently of ministers on the basis of merit has long been a central feature of the Westminster model of public administration'. Flinders focussed on a third feature, noting that '[d]emocracies modelled on the Westminster system have historically employed "first past the post" (FPTP) single-member plurality [electoral] systems' (2010: 42).

Explicit definitions of a 'partial' kind shared some characteristics with these cases; they did include a clear statement of meaning, but it was often far from complete. Some used a cross-reference to other work (often Lijphart) where a full definition could be found. In a fairly typical example Hendriks and Michels (2011:307) referred to Britain as 'a strong example of majoritarian "Westminster democracy"', compared to the Netherlands which 'shows strong characteristics of non-majoritarian "consensus democracy" (Lijphart, 1999)'. Other cases explicitly defined the Westminster model with reference to one or more attributes, but without indicating that this definition was intended to be complete. For example Estevez-Abe writes of 'a Westminster system that centralizes power in the hands of the party leadership and prime minister' (2006: 633), while Rhodes, Wanna and Weller agree that there may 'be no agreed definition of Westminster or even parliamentary government, but most versions embrace the ideas of centralisation and hierarchy' (2009 166). Writing in a comparative politics textbook, Klesner (2014: 274) suggests that in Britain 'parties are accustomed to the single-party majority rule that political scientists have come to call the Westminster model' .

In general, as might be anticipated, textbooks mentioning a relevant term tended to make greater efforts to define it than other texts. Hence in a British context Flinders (2006: 133) refers to the 'pillars of the Westminster model' being parliamentary sovereignty and ministerial responsibility, while going on to list various other features. Several other British politics textbooks likewise provide quite complete definitions (e.g. Kavanagh et al 2006; Leach, Coxall and Robins 2011). Writing on Australia, Weller (2008: nd) notes that 'there has never been an undisputed definition of what should be included in the model', but includes a list of eight possible features. With respect to New Zealand, Palmer and Palmer (2004: 596) suggest that 'Westminster systems of government... [are] founded... on a bedrock doctrine of Parliamentary sovereignty that, in theory, privileges the legislature over all else, including the judicial branch of government'.

### **Intension: how is the Westminster model defined?**

Our first finding is therefore that the term 'Westminster model' is far from universally clarified by authors who deploy it, though some detailed and fairly complete definitions do exist. However, we have already seen that there is diversity among the attributes that authors associate with the model, and that some of those who have paid it the most careful attention emphasise how the term is slippery or contested.

Having identified 196 texts which offer some indication of attributes associated with the model (whether as part of a formal definition or not), we can next assess the diversity of these attributes, and the extent to which there is agreement over which ones apply. That is, following Sartori, to investigate the 'intension' of the term. Table 2 summarises the attributes identified in the 196 texts, according to the fullness of definition that they contain. The attributes listed in the table are indeed fairly diverse, and the boundaries between them not always clear. As in Lijphart's version of the model, some attributes (such as two-party system and single-party majority government) are clearly interrelated. Others (e.g. executive dominance of the legislature, or adversarial political culture) would be difficult to quantify or define with precision. Notably, the table also demonstrates some clear contradiction: 11 texts (primarily in an application of Lijphart) consider unicameralism or quasi-unicameralism to be part of the model, while six authors (all but one of whom provide a full definition) instead associate it with bicameralism. For example writing on the Caribbean, Anckar (2007:641) states plainly that '[c]ountries that adopted at independence the bicameral method are Westminster countries; others are not'.

Table 2: Attributes associated with the Westminster model, by type of definition

Variable	Type of definition						Total	
	Implicit		Partial		Full			
	N	%	N	%	N	%	N	%
Single-party majority government	22	26%	15	34%	36	54%	73	37%
First-past-the-post	19	22%	13	30%	28	42%	60	31%
Two-party system	16	19%	13	30%	21	31%	50	26%
Executive accountable to the legislature	20	23%	5	11%	16	24%	42	21%
Cabinet government	10	12%	9	20%	22	33%	41	21%
Ministerial responsibility	14	16%	10	23%	17	25%	39	20%
Parliamentary sovereignty	3	4%	7	16%	28	42%	38	19%
Neutral civil service	9	11%	6	14%	24	36%	37	19%
Executive drawn from the legislature	11	13%	3	7%	21	31%	35	18%
Executive dominance of the legislature	7	7%	10	23%	17	25%	34	17%
Centralised government	5	6%	11	25%	15	22%	31	16%
Unitary state	4	5%	4	9%	11	16%	26	13%
Adversarial political culture	6	7%	4	9%	8	12%	18	9%
Collective responsibility	6	7%	3	7%	8	12%	17	9%
Strong party discipline	9	11%	-	-	7	10%	16	8%
Professional civil service	4	5%	2	5%	9	13%	15	8%
High party cohesion	5	6%	3	7%	6	9%	14	7%
Unicameral parliament	2	2%	3	7%	6	9%	11	6%
Institutionalised opposition	1	1%	1	2%	6	9%	8	4%
Bicameral parliament	1	1%	-	-	5	7%	6	3%
<b>Total number of articles</b>	<b>85 (100%)</b>		<b>44 (100%)</b>		<b>67 (100%)</b>		<b>196</b>	<b>100%</b>

Despite the imperfect nature of the categories, the table provides some clear indications of attributes most commonly associated with the model. Among texts hinting at intension while falling short of a definition per se, one of the most commonly identified features was executive accountability to the legislature (i.e. being a parliamentary rather than presidential system). In contrast, perhaps surprisingly, this was not among the most frequently mentioned attributes in fuller definitions - though an examination of the countries cited as conforming to the model (below) shows them to be almost universally parliamentary. The omission of this seemingly central attribute from even some fairly complete definitions may in part be attributable to Lijphart's interpretation, which explicitly sought to depart from the established dichotomy between parliamentary and presidential systems to suggest a different dividing line between majoritarian and consensus democracies - hence parliamentarism (i.e. executive dependence on a legislative confidence vote) did not feature in his model. In addition, however, the omission of this factor from some authors' definitions may reflect a belief that it is so fundamental to the model that it does not need pointing out.

The association between the Westminster model and parliamentarism is sufficiently strong that various authors - implicitly or explicitly - take one as a pseudonym for the other. Hence one text suggested that Malaysia is 'a Westminster democracy - which is also known as parliamentary democracy' (Bari 2007: 2), while it was quite common to define the Westminster model against an alternative of US-style presidentialism. Hence one Australian textbook suggested that '[t]he

congressional system of the United States is the best-known alternative to the Westminster system' (Singleton et al 2006: 175), while a text in a Canadian context discussed 'the contrast between a presidential/congressional political system and a Westminster parliamentary system: power concentrated versus power dispersed' (Simeon and Radin 2010: 7). Considering options for South Africa, one author suggested that '[d]espite the apparent unsuitability of the Westminster model, the opposite model of a clear separation of powers has never been a serious alternative' (Nijzinc 2001: 54).

Hence the Westminster model is often presented as an archetypal parliamentary system. As Bach (2003: 329) suggests, 'the Westminster model... is the mental image that most of us probably have in mind when we think of "parliament"'. But some authors do take care to address the diversity of parliamentary systems, instead presenting it as an archetype *within* such systems. For Strøm, Narud and Valen (2005: 782), '[p]arliamentary democracy comes in many forms, but one of the most venerable and influential is the Westminster model', while Norton (2014: 269) proposes that '[t]here are two basic types of parliamentary government: the Westminster parliamentary system and the continental. The Westminster model stresses single-party government, elected normally through a first-past-the-post electoral system, with two major parties competing for the all-or-nothing spoils of electoral victory. The continental parliamentary system places stress on consensus politics'. Nijzinc (2001: 55) also draws this distinction, pointing out that '[i]n addition to the presidential-parliamentary contrast between fusion and separation of powers, there is a further important difference between Westminster's executive dominance and the continental European pattern of executive-legislative balance'.

Other related factors feature in a large number of definitions, including being presented as the (alternative) core feature of the model. For example Harding (2004) places parliamentary sovereignty, and its corollary of an unwritten constitution at its heart. Palmer (2006: 596) agrees that parliamentary sovereignty is the 'bedrock doctrine' of Westminster systems, though goes on to note that 'most Westminster systems have ... succumbed to strong or weak forms of judicial constitutionalism'. The principles of Cabinet government and ministerial responsibility are also frequently mentioned. As Gains and Stoker (2009: 438) suggest, the 'Westminster model stresses the legitimacy of politicians to make decisions arising from their electoral mandate and the accountability of public servants to political leaders and not directly to the public'. For various authors - particularly writing in public administration - the expectation is that this should come with a neutral civil service. For example Miller (2006: 259) points out that in New Zealand, '[i]n the Westminster tradition officials are presumed to be non-partisan servants of the Crown'. Likewise Richards and Smith (2004: 783) emphasise that the 'Westminster model sees officials as neutral, permanent and loyal. Their role is to advise ministers and then implement ministerial decisions. Ministers on the other hand are accountable to Parliament and, through elections, to the public for their decisions'. These texts, and a handful of others, included no other attributes beyond civil service neutrality and ministerial responsibility in defining the model.

In terms of looking for a central feature of the model identifiable from the literature, there are hence clearly no easy answers. But approaching this question purely numerically, the most important feature is probably (in line with Lijphart) majoritarianism. As Vowles (2000: 684) puts it, first past the post is '[o]ne of the deepest foundations of the Westminster model'. For some authors, indeed, the model is synonymous not with parliamentarism, but with this particular electoral system. In an article focused on electoral systems, Pinto-Duchinsky (1999: 116) states that in Britain 'the current method of election [is] by first-past-the-post in single-member constituencies (the Westminster model)', and uses this to suggest that 'the Westminster Model is used in 62 countries and by 49% of the world's electors' (ibid). Southall (2009: 176) likewise suggests that South Africa uses 'a Westminster-style plurality, or first-past-the-post (FPTP), electoral system'.

The other most widely cited features - a two-party system and single-party majority governments - can be seen to flow directly from this one. As can some features which are distinctly more difficult to pin down. These include executive dominance of the legislature - described as 'a strong executive authority' (Burgess 1999: 3) or 'executive supremacy' (Gamble 2003: 20) - and the 'centralising ethos [and] power-hoarding logic' noted by some authors (e.g. Flinders 2011: 2), which is in turn connected to the expectation of a unitary state. A number of authors also put emphasis on internal party behaviour in the legislature. Eggers and Spirling (2014: 20) echo comments cited above when suggesting that '[s]trong party discipline is a defining feature of legislative politics in Westminster systems', while Hix and Noury (2011: 7) propose that a Westminster model of legislative politics is underpinned by a governing party 'which can enforce Party cohesion in votes... [with] the main weapon [being] the threat of a vote-of-confidence'. This again suggests some blurring between Westminster systems and parliamentary systems more broadly (and perhaps implicitly a comparator of US presidentialism, as UK party cohesion is if anything rather lower than in continental parliamentary systems). But in contrast to the 'consensus' parliamentary systems perceived to exist across much of the European continent, some also suggest that Westminster systems are characterised by 'conflict-based relations between parties' (Paun 2011: 452), or 'confrontational politics' (Sawer 2002: 16).

This discussion, and Table 2, have together indicated the 'intension' of the Westminster model, in terms of the features most commonly associated with it. This provides a somewhat confusing picture, despite the fact that the list above is not exhaustive. Less mainstream features suggested included, for example, variable terms of governmental office rather than fixed term parliaments (Elman 2000), or a sufficiently large legislature to ensure 'a critical mass of backbenchers on both sides of the House' (Pond 2005: 184). These both are (or were until the Fixed Term Parliaments Act 2011) features of Westminster, but whether this makes them part of a 'Westminster model' in any meaningful sense is far more questionable.

### **Extension: where is the Westminster model thought to apply?**

We can expect to shed more light on how the literature understands the Westminster model by exploring its 'extension': i.e. the countries to which authors writing about the model consider it to apply. Here, all 226 texts in the dataset (i.e. including those that contained no definition) were coded for the country or countries that they associated with the model. The completed list comprised 50 countries in total, though with the great majority mentioned no more than a handful of times - the top 11 such countries are shown in Table 3.<sup>6</sup>

Table 3: Countries most commonly identified as conforming to the Westminster model

<b>Country</b>	<b>Number of texts</b>
<b>UK</b>	188
<b>Canada</b>	75
<b>Australia</b>	69
<b>New Zealand</b>	65
<b>India</b>	13
<b>Trinidad and Tobago</b>	12
<b>Jamaica</b>	11
<b>Guyana</b>	10
<b>Barbados</b>	10
<b>Ireland</b>	8
<b>Grenada</b>	8

Unsurprisingly, the country which is almost universally mentioned in relation to the model is the UK. References to Canada, Australia and New Zealand also occur particularly frequently (though it must be remembered that such frequencies probably tell us as much about the geographic focus - and origin - of authors contributing to the comparative politics literature as they do about the fit of the model itself). Notably, and again unsurprisingly, all of the countries listed in the table (and most of those included in footnote 6) have a British colonial heritage and are (with the exception of Ireland<sup>7</sup>) Commonwealth members.

In recent years there have been lively debates among scholars of British politics about the extent to which the UK still conforms to the Westminster model. Such questions are not entirely new - for example Norton (2004) points out that Britain's accession to the EU in the 1970s contributed to such doubts. But the largest cause for reflection has been the programme of reform introduced by the Labour governments of 1997-2010, which included territorial devolution to Scotland, Wales and Northern Ireland (which some suggest made Britain 'quasi federal'), partial reform of the House of Lords (which is viewed as having strengthened bicameralism) and the introduction of the Human Rights Act (linked by various authors to greater judicialisation). Subsequently, of course, the 2010 general election resulted in a coalition government, ending a period of single party governments that had previously been uninterrupted since 1945. Authors such as Flinders (2005, 2009) and Hazell (2008) have sought systematically to assess constitutional change against Lijphart's articulation of the Westminster model, and although their conclusions differ, there is general acknowledgement of at least some shift. Norris (2001: 881) is among those who have argued that constitutional change has moved the UK away from the Westminster model, and suggests that the British system is hence 'becoming more like the political systems in Australia and Canada'.

This of course raises the question of the extent to which other frequently cited countries conform to a shared Westminster model, how deviations from it can be accommodated, and hence (again) the degree of diversity that it can contain. This points to the conclusion that, as Wanna (2014: 20) puts it, 'the relatively few remaining jurisdictions that identify with Westminster are all very different to each other and behave differently'.

Lijphart noted in his original (1984: 19) text that '[i]n nearly all respects, democracy in New Zealand is ... a better example of the Westminster model, than British democracy. The country demonstrated a clear concentration of power, being unitary, (since 1952) unicameral, and using a first past the post electoral system that routinely resulted in single party governments. This last feature however ended in 1993, with a move to the Mixed Member Proportional (MMP) system, which had knock-on effects for the composition of parliament, and in turn, New Zealand governments. Nonetheless, in the post-1999 texts that we identified, New Zealand remained a frequent exemplar of the model. As Eichbaum and Shaw (2011: 585) suggest, '[n]otwithstanding its adoption of proportional representation, [New Zealand] retains several elements of the family of ideas that constitute Westminster'. Palmer (2006: 602) agrees, pointing to 'a single hierarchical chain of agency relationships: the public services directed by the Cabinet which is responsible to Parliament and the doctrines of collective Cabinet responsibility and individual ministerial responsibility'. Indeed the New Zealand Parliament (2014) itself suggests that '[o]ur parliamentary system is known as the Westminster model after the British system based at Westminster in London'.

Clear deviations from the model are also seen in most of the countries frequently associated with it, as seen in the top half of Table 4, which links these countries to some of the clearest and most measurable attributes identified in the previous section of the paper. (Here we depart from Lijphart by taking de facto bicameralism as part of the model - but see discussions of Canada and Australia

below.) The most frequently violated expectation is that of an unwritten constitution, which essentially applies to nowhere beyond the UK (New Zealand and Canada having 'constitutions consisting of multiple texts' (Melton, Stuart and Helen 2015: 10) Beyond this, most other countries violate at least one further expectation, and indeed this is particularly the case among those most widely cited as adhering to the model.

Table 4: Key attributes as observed in 'Westminster' and non-Westminster countries since 1999

	Single-party majority government	Parliamentary	Unitary	FPTP	Bicameral	Unwritten constitution
<b>'Westminster model' countries</b>						
UK	~	✓	~	✓	✓	✓
Canada	✗	✓	✗	✓	✓	~
Australia	~	✓	✗	~	✓	✗
New Zealand	✗	✓	✓	✗	✗	~
India	✗	✓	✗	✓	✓	✗
Trinidad & Tobago	~	✓	✓	✓	✓	✗
Jamaica	✓	✓	✓	✓	✓	✗
Guyana	~	✓	✓	✗	✗	✗
Barbados	✓	✓	✓	✓	✓	✗
Ireland	✗	✓	✓	✗	✓	✗
Grenada	✓	✓	✓	✓	✓	✗
<b>Non-Westminster countries</b>						
USA	~	✗	✗	✓	✓	✗
France	✓	~	✓	~	✓	✗

Key: ✓ = yes, ✗ = no, ~ = partly fulfilled (e.g. majoritarian, but non-FPTP, elections; some single party majority governments). For details and sources see Appendix.

Among our texts, Canada is cited as 'the first modern federation to combine the so-called Westminster model of parliamentary government with the federal system of government' (Burgess 1999: 2), the Canadian federation having been established in 1867. Plus, while the federal parliament continues to use first past the post, election results since 1999 have more often than not resulted in minority governments. For this reason also, some recent authors have suggested that '[a]mong Westminster systems, Canada is the deviant case' (Johnston 2010: 208). Others refer to 'more consensual Westminster systems such as Canada' (Caramani 2013: 43).

Australia is almost widely mentioned in association with the Westminster model, but its deviations from it are almost certainly greater. Australia is also a federation. Within 20 years of its creation in 1901 there had been a switch from first past the post to the Alternative Vote (AV) for lower house elections, and in 1948 the Senate (which was always wholly elected) then moved to a proportional representation system. Hence although many both inside and outside Australia continue to see it as a 'Westminster model' country, it is also widely noted that 'Australian political practice has long outgrown the original model to which its founding fathers looked' (Weller 2008: np). Likewise various authors point out key deviations from the model in India, in terms both of federalism and its 'large multi-party system', though the country retains first past the post (Heath et al 2006: 137). In

addition, Singh and Verney (2003: 11) suggest that 'India is unique in its Westminster form of parliamentary federalism', because 'whereas Canada and Australia retain the monarchy, India alone is a republic'.

These deviations from the Westminster model among its best-known exemplars, particularly in terms of recent election results and minority/coalition governments have been frequently noted (e.g. Paun 2011). What is less noted, however, is the extent to which Westminster is seen as a pole to which other systems, sharing little of the heritage of those in the Commonwealth, may or may not adhere. For example, in line with authors viewing the model as synonymous with parliamentary government (or perhaps first past the post) Kretzmer (2006: 61) suggests that 'Israel is a parliamentary democracy, along the lines of the English model', while noting that moving away from multi-partyism in Israel 'could only be achieved by abandoning the system of proportional representation in favour of a system similar to the Westminster model' (ibid:65). Strøm, Narud and Valen (2005: 785-86) suggest that in the 1960s Norway 'looked much like a Westminster system', but subsequently 'moved away from this model' as a result of minority government, a more fragmented party system and an increasingly assertive judiciary. Meanwhile, writing on Japan, Estevez-Abe (2006: 633) claims that 'whether voters intended to do so or not, Koizumi's 2005 landslide has cast the die in favor of a Westminster system that centralizes power in the hands of the party leadership and prime minister'.

These examples all add to the impression that the Westminster model is a distinctly movable feast. Deviations away from almost any of its key features are not sufficient for a country to shed the label, while adopting only one or two of these features raises questions about whether a new country has entered the fold. In this respect, the Westminster model is clearly closer to a 'family resemblance' concept than to a 'classic' social science concept of the kind that Sartori recognised. This is perhaps appropriate, given that authors often speak of the 'Westminster family', and that one of the key attributes that continues to bind these countries together is a common British parentage. But in social science terms Table 4 does not suggest that the concept meets the formal requirements of a 'family resemblance' concept, in terms of a minimum number of features being shared. Australia and New Zealand each consistently display only two of the attributes (and have just one overlapping: parliamentarism), while Canada and India consistently display only three. But, as shown at the bottom of the table, it is possible to find other examples from beyond the 'family' with a similar number of attributes: the USA practices first past the post, and has a two-party system, and is bicameral, but is nonetheless widely presented as the polar opposite of the model. France, likewise, uses a majoritarian electoral system, is only semi-presidential, unitary, and shares the same kind of weak to medium strength bicameralism generally ascribed to the UK. Nowhere, however, is it suggested that France should be considered a Westminster model democracy.

Some authors have explicitly sought to reflect how some supposedly Westminster model countries are better considered some kind of hybrid, or halfway house. The term 'Washminster' was coined by Thompson (1980) to describe Australia's fusion of certain Westminster elements (notably parliamentarism) with others more akin to the seat of US government in Washington (notably a strong, directly elected Senate), and this term has continued to be used (e.g. Bach 2003). Butler (1974) simply preferred to describe the Australian variant as the 'Canberra model'. More recently, Kumarasingham (2013: vi) has suggested the term 'Eastminster' to capture the export of UK-style institutions to India and Sri Lanka, because these countries 'altered and adapted the Westminster system for their own soil'. But while these hybrid terms are intended to respect and reflect deviations from the original, such deviations are (at least by now) almost universal. More than a decade ago, Norris (2001: 878), suggested that 'we are perhaps witnessing the twilight of the pure Westminster model, with only a few states like Barbados continuing to cling to this ideal'. Her analysis is clearly supported by the data in Table 4. Nonetheless, even the suggestion that the

Westminster model has a vestigial existence in the Caribbean is not wholly uncontroversial. Bishop (2001: 421) describes Caribbean variants as 'in many respects a caricature of Westminster with the intensification of many of its least desirable aspects'. This, he suggests, is not the formerly-benign Westminster, but instead a 'Westmonster', which must be slayed.

## Conclusion

We have followed Sartori's (2009 [1984]) advice in seeking to 'reconstruct' the concept of the Westminster model, by reviewing its use in recent literature. Our first finding was that the term is frequently used with little or no definition. This may be because some authors believe, in line with Kerr and Kettell (2006: 7), that '[t]he central features of this model are by now so well-known that they are barely worth recounting'. But our further analysis of how the literature describes both the term's intension (i.e. properties with which it is associated) and extension (i.e. its application to specific cases) shows that this is not in fact the case. The model is associated with numerous properties, which are given varying weight by different authors. It is also associated with numerous countries, some of which display few of these properties.

While we have not conducted a full historical analysis of the literature (this might become the topic of a different paper, or be incorporated into a revised version of this one), it seems clear that the Westminster model has had different meanings over time, all of which continue to have some vestigial use. For some authors it retains its initial meaning, as shorthand for the set of political institutions that apply (or, perhaps, used to apply) in the UK. For others it denotes a political system that has been influenced by UK institutions. For a further set of authors it is (erroneously) a term interchangeable with parliamentarism - as distinct from what is seen as its polar opposite, US presidentialism. Finally, particularly as a result of Lijphart's (1984, 1999) interventions, the term has become synonymous with majoritarianism. These latter interventions in some respects added precision to a term whose sense had become distinctly clouded, by suggesting 10 relatively clear attributes associated with the model. But in other respects this added to the confusion, because Lijphart's ideal type did not apply in any existing country, while various cases previously associated with the model did not share the attributes proposed.

A natural conclusion might be that the Westminster model cannot be considered a classical concept, but instead is a 'family resemblance' concept. This is implied by various authors. For example Harding (2004: 146) suggests that '[w]hile one can identify essential features, hardly any one of these can be said, logically, to be essential in the sense that if it is missing in a given instance the Westminster model does not apply or has ceased to exist'. Many countries associated with the model can be seen as part of a family in the natural language sense, in that they have a shared ancestor in the institutions of the UK. But that was in most cases generations ago, during which time much has changed (including in the UK itself). A newcomer introduced to this family without knowing its history would note a good deal of diversity among its members - as in a human family where some members are tall and others short, some are blonde and others dark, some are slim and others plump, and so on. Indeed the only obvious thing uniting members of such a family may be the bloodline itself. While this might satisfy everyday expectations, it falls well short of the requirements of a family resemblance concept in a social science sense. In order to ensure that  $m$  out of  $n$  attributes are present with respect to the Westminster model,  $m$  must be set so low that various other friends and neighbours who do not share the bloodline - and are hence not conventionally seen as members of the family at all - deserve inclusion.

An obvious question after this exercise is whether the concept of the Westminster model can, and should, be rescued. It could be argued that the literature has simply been corrupted by a few

misguided or ill-informed scholars. Our conclusion is that the problem is more serious. As Sartori himself suggests, when the meaning of a term is unclear:

... it is important to distinguish between individual and collective ambiguity. *Individual ambiguity* is a single author's confusion, his own obscurity and/or inconsistency of meaning. *Collective ambiguity* attests, instead, to an infelicitous state of a discipline as such: it is a situation in which (at the limit) each scholar ascribes his own meanings to his key terms. To be sure, individual equivocation worsens collective ambiguity. Yet collective ambiguity can be rampant - to the point of destroying a discipline (2009 [1984]: 111, italics in original).

The discussion of the Westminster model in the recent literature seems to be a clear example of collective ambiguity. The term has different meanings to different authors, and is used in contradictory ways. Rather than serving as a model, its likeliest effect is to induce muddle instead.

Our conclusion is thus that it is time for the Westminster model to be retired. While this term may once have had meaning (or meanings), a combination of conceptual confusion among authors and real-world change have seen it stretched beyond recognition. As Collier and Mahon (1993: 845) note, 'the problem of conceptual stretching can arise not only from movement across cases but also from change over time within cases'. Given the degree of change within supposedly 'Westminster model' countries, this term has now outlived its usefulness. In terms of classes to which its best-known members belong, two clearer and more parsimonious categories might be identified. The first is democracies which were historically influenced by UK institutions - but which now include a good deal of diversity, to the point where some share more institutional features with countries outside the group (e.g. New Zealand and Ireland with the Nordic countries). The second category is that of majoritarian parliamentary systems, as distinct from presidential systems or parliamentary systems based on proportional elections. Many 'Westminster model' countries (including most in the Caribbean) still fit this category, but so do others such as France. A category of majoritarian parliamentary systems would have both clarity and utility. But if this is what we mean, we should simply call it that.

## Bibliography

- Anckar D. (2007) Westminster Lilliputs? Parliaments in former small British colonies, *Parliamentary Affairs*, 60(4), pp. 637-654
- Aucoin P. (2012) New Political Governance in Westminster Systems: Impartial Public Administration and Management Performance at Risk, *Governance*, 25(2), pp.177-199
- Bach, S. (2003) *Platypus and Parliament: The Australian Senate in Theory and Practice*. Canberra: Department of the Senate
- Bagehot, W. (2001 [1867]) *The English Constitution*. Oxford: Oxford University Press
- Bari, A.A. (2007) British Westminster System in Asia-The Malaysian Variation, *US-China Law Review*, 4(1), pp.1-9
- Beck et al (2001) New tools in comparative political economy: The Database of Political Institutions, *World Bank Economic Review*, 15(1),pp.165-176
- Bishop M.L. (2011) Slaying the 'Westminster' in the Caribbean? Constitutional reform in St Vincent and the Grenadines, *British Journal of Politics and International Relations*, pp. 420-437
- Burgess M. (1999) Obstinate or obsolete? The state of the Canadian federation, *Regional and Federal Studies*, 9(2), pp. 1-15
- Butler, D. (1974) *The Canberra Model: Essays on Australian Government*. 2<sup>nd</sup> edition, London: Macmillan
- Caramani, D. (2013) *Comparative Politics*. 3rd edition, Oxford: Oxford University Press

- Cheibub, J., Elkins, Z., Ginsburg, T. (2014) Beyond Presidentialism and Parliamentarism, *British Journal of Political Science*, 44, pp 515-544.
- Collier, D., Mahon, J. (1993) Conceptual "Stretching" Revisited: Adapting Categories in Comparative Analysis, *The American Political Science Review*, 87(4) pp. 845-855
- De Smith, S.A. (1961). 'Westminster's export models: the legal framework of responsible government', *Journal of Commonwealth Studies*, 1 (1), pp. 3–16.
- Eggers A.C., Spirling A. (2014) Party Cohesion in Westminster Systems: Inducements, Replacement and Discipline in the House of Commons, 1836–1910, *British Journal of Political Science*, pp. 1 - 23
- Eichbaum, C. & Shaw, R. (2011) Political staff in executive government: Conceptualising and mapping roles within the core executive, *Australian Journal of Political Science*, 46(4), pp. 584-616
- Elman, M.F (2000) Unpacking democracy: presidentialism, parliamentarism, and theories of democratic peace, *Security Studies*, 9(4), pp. 91-126
- Estevez-Abe M. (2006) Japan's shift toward a Westminster system: A structural analysis of the 2005 lower house election and its aftermath, *Asian Survey*, 46(4), pp. 632-651
- Flinders M. (2011) Devolution, delegation and the Westminster model: A comparative analysis of developments within the UK, 1998-2009, *Commonwealth and Comparative Politics*, 49 (1), pp. 1-28
- Flinders, M. (2005) Majoritarian Democracy in Britain, *West European Politics*, 28 (1), 62-94
- Flinders, M. (2006) 'The Half-Hearted Constitutional Revolution', in Dunleavy, P. et al (ed.) (2006) *Developments in British Politics 8*. Basingstoke: Palgrave Macmillan
- Flinders, M. (2009) *Democratic Drift: Majoritarian Modification and Democratic Anomie in the United Kingdom*, Oxford: Oxford University Press
- Flinders, M. (2010) Explaining Majoritarian Modification: The Politics of Electoral Reform in the United Kingdom and British Columbia, *International Political Science Review*, 31(1), pp.41-58
- Gains, F. & Stoker, G. (2009) Delivering 'public value': Implications for accountability and legitimacy, *Parliamentary Affairs*, 62(3), pp. 438–455
- Gamble, A. (2003) 'Remaking the Constitution' in Dunleavy, P. et al. (2003) *Developments in British Politics 7*. Basingstoke: Palgrave, pp.18-38
- Goertz, G. (2006) *Social Science Concepts: A User's Guide*. Princeton and Oxford: Princeton University Press
- Harding, A. (2004) The 'Westminster Model' Constitution Overseas: Transplantation, Adaptation and Development in Commonwealth States, *Oxford University Commonwealth Law Journal*, 4(2), pp.143-166
- Hazell, R. (2008) 'Conclusion: Where Will the Westminster Model End Up?' in Hazell, R. (ed.) (2008) *Constitutional futures revisited: Britain's constitution to 2020*. Basingstoke: Palgrave Macmillan
- Heath A., Glouharova S., Heath O. (2006) 'India: Two-Party Contests within a Multiparty System', in Gallagher, M. Mitchell P.(eds.) *The Politics of Electoral Systems*. Oxford: Oxford University Press
- Hendriks, F. & Michels, A. (2011) Democracy Transformed? Reforms in Britain and The Netherlands (1990–2010), *International Journal of Public Administration*, 34(5), pp.307-317
- Hix S., Noury, A. (2011) 'Government-Opposition or Left-Right? The Institutional Determinants of Voting in Legislatures', Unpublished paper, Department of Political Science, London School of Economics
- Hopkin, J., Bradbury, J. (2006) British Statewide Parties and Multilevel Politics, *Publius*, 36 (1), pp.135-152
- Johnston, R. (2010) 'Political Parties and the Electoral System' in Courtney, J.C., Smith, D. (eds.) (2010) *The Oxford Handbook of Canadian Politics*, Oxford: Oxford University Press, pp.208-223
- Judge, D. (2003) Legislative Institutionalization: A Bent Analytical Arrow?, *Government and Opposition*, 38(4), pp.497-516
- Kavanagh D., et al (2006) *British Politics*, Oxford: Oxford University Press

- Kerby M., Banfield A.C. (2014) The determinants of voluntary judicial resignation in Australia, Canada, and New Zealand, *Commonwealth and Comparative Politics*, 52(3), pp.335-357
- Kerr P., Kettell S. (2006) In defence of British politics: The past, present and future of the discipline, *British Politics*, 1(1), pp. 3-25
- Klesner, Joseph L. (2014) *Comparative Politics: An introduction*, New York, NY : McGraw Hill Education
- Kretzmer D. (2006) Experimenting with constitutional change: Direct election of the prime minister in Israel, *European Constitutional Law Review*, 2(1), pp. 60-80
- Kumarasingham, H. (2013) *A Political Legacy of the British Empire: Power and the Parliamentary system in Post-Colonial India and Sri Lanka*. London and New York: I.B. Tauris
- Leach, R., Coxall, B. and L. Robins (2011) *British Politics*. Basingstoke: Palgrave Macmillan
- Lijphart, A. (1984) *Democracies: Patterns of Majoritarian and Consensus Government in Twenty-One Countries*, New Haven and London: Yale University Press
- Lijphart, A. (1999) *Patterns of Democracy: Government Forms and Performance in Thirty-Six Countries*. 2<sup>nd</sup> edition, London and New Haven: Yale University Press
- Melton, J., Stuart, C. and Helen, D. (2015) *To Codify or Not to Codify?* London: Constitution Unit
- Miller, R. (2006) *New Zealand Government and Politics*. Oxford: Oxford University Press
- Monk D. (2010) A framework for evaluating the performance of committees in Westminster parliaments, *Journal of Legislative Studies*, 16(1), pp.1-13
- New Zealand Parliament (2014) Parliament Brief: What is Parliament? [accessed 30.06.2015]
- Nijzinc, L. (2001) Opposition in the new South African parliament, *Democratization*, 8(1), pp.53-68
- Norris P. (2001) The twilight of Westminster? Electoral reform and its consequences, *Political Studies*, 49(5), pp. 877-900
- Norton, P. (2004) Regulating the Regulatory State, *Parliamentary Affairs*, 57(4), pp. 785-799
- Norton, P. (2014) 'The Changing Constitution' in Jones, B., Norton, P. (eds.) (2014) *Politics UK*. London: Routledge, pp.250-270
- Palmer, G and Palmer, M. (2004) *Bridled power: New Zealand's constitution and government*. Oxford: Oxford University Press
- Palmer, M. (2006) Using Constitutional Realism to Identify the Complete Constitution: Lessons from an Unwritten Constitution, *The American Journal of Comparative Law*, 54(3), pp. 587-636
- Patapan, H., Wanna, J. and Weller, P.M. (2005) *Westminster Legacies: Democracy and responsible government in Asia and the Pacific*, Sydney : UNSW Press
- Paun A. (2011) After the age of majority? Multi-party governance and the Westminster model *Commonwealth and Comparative Politics*, 49(4), pp. 440-456
- Pinto-Duschinsky, M.(1999) Send the rascals packing: Defects of proportional representation and the virtues of the Westminster model, *Representation*, 36(2), pp. 117-126
- Pond, D. (2005) Imposing a neo-liberal theory of representation on the Westminster model: A Canadian case, *The Journal of Legislative Studies*, 11(2)
- Rhodes R.A.W., Wanna J., Weller P. (2009) *Comparing Westminster*. Oxford: Oxford University Press
- Richards, D. & Smith, M.J. (2004) Interpreting the world of political elites, *Public Administration*, 82(4), pp. 777-800
- Sartori, G. (1970) Concept Misformation in Comparative Politics, *The American Political Science Review*, 64 (4), pp.1033-1063
- Sartori (2009 [1984]) 'Guidelines for concept analysis' in Collier, D., Gerring, J. (2009) (eds.) *Concepts and Method in Social Science: The Tradition of Giovanni Sartori*. London and New York: Routledge, pp.97-150
- Sawer M. (2012) What makes the substantive representation of women possible in a Westminster parliament? The story of RU486 in Australia, *International Political Science Review*, 33(3), pp. 320-335
- Simeon, R. & Radin, B.A. (2010) Reflections on comparing federalisms: Canada and the United States, *Publius: The Journal of Federalism*, 40(3), pp.1-9

- Singh, M.P., Verney, D.V. (2003) Challenges to India's centralized parliamentary federalism  
Challenges to India's centralized parliamentary federalism, *Publius: the Journal of Federalism*,  
33(4), pp. 1-20.
- Singleton, G. et al (eds.) (2006) *Australian Political Institutions*. Imprint Frenchs Forest, N.S.W. :  
Pearson Education
- Southall, R. (2009) The Congress of the People: Challenges for South African Democracy,  
*Representation*, 45(2), pp. 173-191
- Strøm, K., Narud, H.M. & Valen, H. (2005) A more fragile chain of governance in Norway, *Western  
European Politics*, 28(4), pp. 781-806
- Thompson, E. (1980) The Westminster mutation, *Politics*, 15(2), pp.32-40
- Vowles, J. (2000) Introducing proportional representation: the New Zealand experience,  
*Parliamentary Affairs*, 53(4), pp. 680–696
- Wanna J. (2014) Australia's Future as a 'Westminster Democracy' - threats to combat, stark choices  
to make, *Australian Journal of Public Administration*, 73(1), pp.19-28
- Weller, P. (2008) 'Westminster systems' in Galligan B., Roberts, W. (eds.) (2008) *The Oxford  
companion to Australian politics*. Oxford: Oxford University Press, available at  
[www.oxfordreference.com](http://www.oxfordreference.com) [accessed 9 July 2015]

## Appendix

Country	Types of government	Regime type	Territorial arrangements	Electoral system	Parliament	Written constitution
<b>Westminster countries</b>						
<b>UK</b>	Mostly single-party majority governments	Parliamentary	Unitary (+devolution)	FPTP	Bicameral	Uncodified constitution (Parliamentary sovereignty)
<b>Canada</b>	Mostly minority governments	Parliamentary	Federal	FPTP	Bicameral	Codified
<b>Australia</b>	Mostly single-party majority governments	Parliamentary	Federal	AV	Bicameral	Written constitution
<b>New Zealand</b>	Minority and coalition governments	Parliamentary	Unitary	MMP	Unicameral	Codified
<b>India</b>	Mostly coalition governments	Parliamentary	Federal	FPTP	Bicameral	Written constitution
<b>Trinidad and Tobago</b>	Mostly single-party majority governments	Parliamentary	Unitary	FPTP	Bicameral	Written constitution
<b>Jamaica</b>	Single-party majority governments	Parliamentary	Unitary	FPTP	Bicameral	Written constitution
<b>Guyana</b>	Mostly single-party majority governments	Parliamentary	Unitary	List PR	Unicameral	Written constitution
<b>Barbados</b>	Single-party majority governments	Parliamentary	Unitary	FPTP	Bicameral	Written constitution
<b>Grenada</b>	Single-party majority governments	Parliamentary	Unitary	FPTP	Bicameral	Written constitution
<b>Ireland</b>	Coalition governments	Parliamentary	Unitary	STV	Bicameral	Written constitution
<b>Non-Westminster countries</b>						
<b>USA*</b>	Mostly Single-party majority governments	Presidential	Federal	FPTP	Bicameral	Written Constitution
<b>France</b>	Single-party majority governments	Parliamentary	Unitary	Two-round system	Bicameral	Written constitution

### Sources:

Types of government based on IPU data on election outcomes 1999-2015 (see next table for details):

<http://www.ipu.org/parline-e/parlinesearch.asp>

Regime type: Beck, et. al (2001) – N.B. this classifies France as parliamentary. Many would consider it semi-presidential, and to avoid too much ‘stretching’ of our own, we acknowledge this in Table 4.

Federal/Unitary state according to the Constitute database (federal constitution yes/no)

<https://www.constituteproject.org/search?lang=en>

Electoral systems as listed in International IDEA <http://www.idea.int/esd/world.cfm>

IPU data on parliaments <http://www.ipu.org/parline-e/parlinesearch.asp>

The data on the presence or absence of a written constitution originates from Melton, Stuart and Helen (2015) and the Constitute database <https://www.constituteproject.org/search?lang=en>

**Election results 1999-2015**

<b>Westminster countries</b>					
UK	2001 single-party majority	2005 single-party majority	2007 single-party majority	<b>2010 coalition</b>	2015 single-party majority
Canada	2000 single-party majority	<b>2004 minority government</b>	<b>2006 minority government</b>	<b>2008 minority government</b>	2011 single-party majority
Australia	2001 single-party majority	2004 single-party majority	2007 single-party majority	2010 minority government	2013 single-party majority
New Zealand	<b>2002 coalition (+c&amp;s)</b>	<b>2005 coalition (+c&amp;s)</b>	<b>2008 minority government (+c&amp;s)</b>	<b>2011 minority government (+c&amp;s)</b>	<b>2014 minority government (+c&amp;s)</b>
India	<b>1999 coalition (alliance)</b>	<b>2004 coalition (alliance)</b>	<b>2009 coalition (alliance)</b>	2014 single-party majority	
Trinidad and Tobago	2000 single-party majority	2002 single-party majority	2002 single-party majority	<b>2010 coalition (pre-electoral)</b>	
Jamaica	2002 single-party majority	2007 single-party majority	2007 single-party majority		
Guyana	2001 single-party majority	2006 single-party majority	2011 minority government	2015 single-party majority	
Barbados	1999 single-party majority	2003 single-party majority	2008 single-party majority	2013 single-party majority	
Grenada	1999 single-party majority	2003 single-party majority	2008 single-party majority	2013 single-party majority	
Ireland	<b>2002 coalition</b>	<b>2007 coalition</b>	<b>2011 coalition</b>		
<b>Non-Westminster countries</b>					
USA*	2000 single-party majority	2004 single-party majority	2008 single-party majority	2012 minority government	
France	2002 single-party majority	2007 single-party majority	2012 single-party majority		

**Source**

Election data from <http://www.ipu.org/parline-e/parlinesearch.asp>

\* Defined as President's party having a majority in the House of Representatives. Clearly in the context of presidentialism this is an imperfect indicator.

<sup>1</sup> The graph shows the occurrence of the term as a proportion of all two-word phrases in texts captured by Google books from each given year (see <https://books.google.com/ngrams/info>). Note that this is a relative, not an actual measure: as the number of books published has also risen sharply over this period, the growth in *actual* incidence of the term would be far steeper.

<sup>2</sup> A list of textbooks was drawn from comparative politics reading lists available online from US and UK universities, which included Harvard, Princeton, Yale, Stanford, Oxford, and the University of Edinburgh. We assumed that textbooks are likely to reflect the 'mainstream' understanding of the Westminster model in the discipline.

<sup>3</sup> Following a similar process, we compiled a list of mainstream texts on parliaments and political systems for the four countries traditionally associated with the Westminster model: Australia, Canada, New Zealand and the UK. The results of our analysis (Table 3) later suggested that the countries most frequently associated with the Westminster model in the literature are also the ones traditionally associated with Westminster.

<sup>4</sup> Countries covered in single country case studies comprised Australia, Canada, India, Israel, Jamaica, Japan, Malaysia, New Zealand, Norway, Papua New Guinea, Singapore, and Sri Lanka. The textbooks specifically covered Australia, Canada, New Zealand and the UK.

<sup>5</sup> Our full criteria were as follows. A definition must include an explicit statement of meaning: the term is mentioned followed by a statement describing its significance. The statement of significance may or may not be followed by a list of attributes associated with the term. If the definition is developed or 'full', the term is defined extensively, the author lists attributes associated with the model and discusses their functioning. Aspects such as deviations from the model, the usefulness of the term and limitations of current understandings of it are discussed. If the definition is 'partial', the term is mentioned followed by a statement describing its significance, but the statement may be weak or underdeveloped, or the publication may simply refer to an established definition in the literature.

<sup>6</sup> Other countries (none mentioned more than 6 times) were: Antigua and Barbuda, Bahamas, Bangladesh, Belize, Cook Islands, Cyprus, Dominica, Fiji, Israel, Kiribati, Malaysia, Maldives, Malta, Mauritius, Nauru, Nepal, Nigeria, Norway, Papua New Guinea, Samoa, Seychelles, Sierra Leone, Singapore, Solomon Islands, South Africa, Sri Lanka, St Lucia, St Vincent and the Grenadines, St. Kitts-Nevis, St. Lucia, St. Vincent and the Grenadines, Swaziland, Tonga, Tuvalu, Vanuatu, Western Samoa.

<sup>7</sup> Ireland departed the Commonwealth in 1949, though there has been some recent discussion of it rejoining (see for example <http://www.telegraph.co.uk/news/uknews/northernireland/7526873/Could-Ireland-really-rejoin-the-Commonwealth.html>).