

Key term

Unified government When the presidency and both houses of Congress are controlled by the same party (the opposite of divided government).

Unified/divided government

A president will usually find it much easier to be successful with Congress if both houses are controlled by his party — what we call **unified government** — and much more difficult if there is divided government, with the opposition party controlling one or both houses of Congress. Back in Table 4.9 (page 145) we can see how presidents achieve significantly higher levels of support in Congress under unified government than under divided government. For presidents Bill Clinton to Barack Obama, the average presidential support score for years of unified government was 83% while the average score for years of divided government was just 53%.

Crises

After the attacks of 11 September 2001, President Bush's approval soared in what is known as a 'rally effect' — or, more fully, a 'rally-round-the-flag effect' — a phenomenon that often occurs during times of crisis when Americans tend to rally around the commander-in-chief. On 7 September, Bush's approval rating was 51%; two weeks later it was 90%. Bush's approval ratings stayed above 80% for six months, and above 70% for a further four months. During this time Bush was able to win passage of key pieces of legislation, not only concerning national security, but also education. His father experienced a similar surge of support back in 1990 following the successful ousting of Iraq's Saddam Hussein from Kuwait, but his support faded a good deal more quickly. Bill Clinton's approval ratings went up 5 percentage points after the Oklahoma City bombing in April 1995.

The future of the presidency

We have seen that the office which Donald Trump inherited in 2017 is significantly different even from the one which Ronald Reagan inherited nearly 40 years ago. That change can really be summed up in one word — partisanship. True, some conventional wisdom still holds, but the landscape has changed. So what does the future hold for the presidency in an era of partisanship?

To answer this, we need to pose one further question. Will presidents conclude that persuasion and compromise are things of the past? As George C. Edwards (2009) has suggested, might presidents in the context of polarised politics conclude that they can no longer govern by adopting an inclusive approach to policy making, that there is little potential for persuasion, and the only way to govern is on the basis of a '50% plus 1' majority?

This is what we have seen with both Bush and Obama — that rather than seeking compromise with their opponents by bringing them into an inclusive coalition and supporting legislation broadly acceptable to the electorate, they sought, as Edwards put it, 'to defeat the opposition, creating winners and losers in a zero-sum game'. If so, then presidential elections will be no more than an effort to mobilise one's own party base rather than convince undecided and swing voters of the merits of one's vision for the country — which is really what we saw in 2016.

Comparing the US president and the UK prime minister

Structural differences in the executive

The structural differences between the executive branches of the United States and the UK are wide ranging. The presidency as an office is a product of revolution — of the War of Independence, and the constitutional convention

that followed some years later. There is no doubt that George Washington was the first president and that Donald Trump is therefore the forty-fifth. In the United States, all executive power is vested in the president. The president is elected by the people, through the Electoral College, for a maximum of eight years. Once in office, the president gains the title of party leader, but that means little in practice. The president is entirely separate from the legislature and often has never been a member of it. The president's cabinet is no more than an optional advisory group and has no decision-making powers.

In the UK, the office of prime minister is the product of evolution over many centuries. The title of prime minister is generally regarded to have been first accorded, posthumously, to Sir Robert Walpole who was First Lord of the Treasury between 1721 and 1742. But the office he held was so unlike that of the modern-day prime minister as to be almost unrecognisable. In Britain, executive power is divided between the monarch, and the prime minister and cabinet. The prime minister is not directly elected to the office and there is no limit on the length of time he or she may serve. The prime minister gains that office only by being the leader of the largest party in the House of Commons and is the *de facto* leader of that house. The prime minister and cabinet together form a plural executive with the prime minister described as 'first among equals'.

The contrasts are stark. Even the architecture speaks of difference. In Washington DC, the White House may not be on the grand scale of Buckingham Palace, but it is certainly more imposing than 10 Downing Street, and the White House Residence — where the president and their family live and entertain visiting dignitaries — is certainly far more spacious than the third floor flat in Number 10, which is so cramped that recent prime ministers have occupied a slightly more spacious flat next door at Number 11. And when it comes to office space, the president has the Oval Office, the West Wing and the 566-room Eisenhower Executive Office Building, compared with the very limited space prime ministers have for themselves and their staff. Indeed, the prime minister is usually pictured working in the cabinet room — a room that speaks as much about collegiality as the Oval Office does about individuality.



The Eisenhower Executive Office Building stands to the west of the White House

Roles and powers

Earlier in this chapter we identified 11 formal powers of the president. Of those 11, only four can be said also to be performed by the British prime minister — propose legislation, submit the annual budget, act as chief executive and nominate executive branch officials (see Table 4.12). But even these shared powers are not identical and here once again we are seeing the effect of the structural differences between the two systems.

Table 4.12 US president and UK prime minister: comparing roles and powers

US president	UK prime minister
Elected as president	Elected as party leader
Chief executive and head of state	Head of government only
Legislation: initiating and veto powers	Draws up government's legislative programme with cabinet
Appoints cabinet but subject to Senate confirmation	Appoints cabinet (no confirmation)
Commander-in-chief of the Armed Forces, but only Congress can declare war	Can use royal prerogative to declare war and deploy troops abroad but recently more subject to parliamentary approval
Has vice president	May appoint deputy prime minister
Has (large) Executive Office of the President	Has (small) Number 10 staff and Cabinet Office
Has a variety of means to pursue policy unilaterally: executive orders, signing statements, etc.	More likely to pursue policy collectively, through either cabinet or cabinet committees
Limited to two full terms in office	No term limits

- When the president proposes legislation to Congress in the State of the Union Address, it is really no more than a wish list. But at least it is the president's own speech. The British prime minister gets to write the speech but it is delivered by the monarch in what today is called the Queen's Speech. But it's a lot more than a wish list. It is the government's 'to do' list for the coming year — a list of near certainties. Clearly the two offices are affected by the separation of powers structure in the United States and the fusion of powers structure in the United Kingdom.
- Both the president and prime minister may submit their annual budgets to their respective legislatures. But in the United States this marks only the beginning of many months of bargaining during which the president may be defeated on many items. In the UK, the budget submitted is to all intents and purposes the budget that will be passed.
- Both the president and the prime minister fulfil the role of chief executive — though the president does so as part of a singular executive, while the prime minister is, in theory at least, part of a collective executive. Again, structural differences mean differences of political outcome.
- Both also get to appoint numerous executive branch officials, but unlike the president, the prime minister does not require anyone to confirm those appointments before they take effect.

The British prime minister lacks some significant powers that the American president enjoys, and most of them are performed by the monarch:

- The president can sign and veto legislation. In Britain that is the power of the monarch, though a monarch has not refused to sign a bill passed by Parliament since 1707 — 80 years before the US Constitution was conceived.

- The president appoints all federal judges, but in Britain the power to appoint judges was given in 2006 to the independent Judicial Appointments Commission.
- The president has the power of pardon — a power reserved to the monarch in Britain.



Theresa May and Queen Elizabeth II on the day that May became British Prime Minister, 13 July 2016

Key term

Head of state The chief public representative of a country, who performs ceremonial functions on behalf of that country.

- Most importantly, the president is not only chief executive (head of government) but also **head of state**. In Britain the two roles are separated with the monarch fulfilling the head of state role.

However, the prime minister enjoys certain roles and powers of their own:

- Prime ministers play an important role in Parliament and none more so than in answering questions at their weekly half-hour Question Time. A prime minister's ability to 'stand and deliver' at Prime Minister's Question Time is vital to their survival. Presidents face no such ordeal.
- Prime ministers also make occasional statements to Parliament, appear before the Commons' Liaison Committee and occasionally lead in significant parliamentary debates. Again, the American president plays none of the equivalent roles.
- The prime minister's patronage also extends beyond executive branch appointments to such posts as the chairmanship of the BBC and Church of England bishops and archbishops, and recommending life peerages.

Accountability and relations with the legislature

The relations of the US president and UK prime minister with their respective legislatures are compared in Table 4.13. As we already know, the most significant difference is structural: the US president is not and cannot be a member

of Congress whereas the British prime minister must be a serving member of Parliament. Indeed, anyone elected president who is currently a member of Congress must resign their seat — as Barack Obama did after the 2008 election.

The president has no formal links with Congress. Indeed, his party may be in the minority in one or both houses. But the president's continuance in office does not rely on him winning votes in Congress. There are no votes of confidence that could abruptly bring his administration to an end and precipitate new elections. Even were the president to be impeached, found guilty and removed from office, the vice president would step up and take over. The president lacks both the sticks and carrots that the British prime minister enjoys in controlling the legislature. The sticks of party discipline are wholly ineffective; the carrots of appointments to his administration are almost always unwanted.

Furthermore, Congress possesses some significant checks on the president's powers. It can:

- amend, block or reject the bills and budgets he proposes
- override the presidential veto
- reject appointments to the executive and the judiciary (Senate)
- reject treaties (Senate)

It also possesses powers to hold the president accountable through investigation and impeachment of any executive branch official, including the president.

Table 4.13 US president and UK prime minister: comparing relations with legislature

US president's relations with Congress	UK prime minister's relations with Parliament
State of the Union Address	Queen's Speech
Dependent on Senate for confirmation of numerous appointments	Makes numerous appointments without need for legislature to consent
Possibility of divided government	May not have majority in House of Lords
Budget may be significantly amended or defeated in Congress	Budget subject to parliamentary scrutiny
No executive branch members in Congress	Executive branch members in both houses, and dominate House of Commons
Not subject to personal questioning by members of Congress	Prime Minister's Question Time
Gets agreement in Congress mostly by persuasion and bargaining	Gets agreement in Parliament mostly by party discipline and reliance on the payroll vote in the House of Commons
President individually subject to impeachment (House) and trial (Senate)	Prime minister and government collectively subject to vote of no confidence

On the other hand, the prime minister is the leader of the largest party in the House of Commons. Prime ministers' survival depends on both their maintaining their leadership position and their party maintaining its majority status. Not only is the prime minister a member of Parliament, but so are the other members of their administration.

For its part, Parliament has certain methods of scrutinising and checking the actions of the executive. It can hold the prime minister and government to account through: Question Time; select committees; policy debates; early day motions; and votes of no confidence. The effectiveness of these methods of scrutiny and accountability can, however, be questioned. In the battle between the executive and legislature, the prime minister holds most of the trump cards. The prime minister has wide-ranging powers of patronage and the expertise of the civil service.

Cabinets

In their respective cabinets we see more structural differences between the two systems, which give rise to different political outcomes (see Table 4.14). The president's cabinet — and even that term is significant — exists as part of a singular executive. All executive power is vested in the president, none in the cabinet, which is why its members are correctly referred to as cabinet *officers* or *secretaries*, not cabinet *ministers*. They are excluded from the legislature and many have no obvious party political affiliation. Neither does the president have an entirely free hand in appointing cabinet officers, as they must be approved by a majority vote in the Senate.

Cabinet officers will not have served together as part of a shadow cabinet before taking office. Indeed, they may be complete strangers both to each other and even to the president. They are not the president's equals and have no elective base. Politically, they are not the president's political rivals. Much of this is dictated by the doctrine of the separation of powers. The structure determines the function. As a result, the president's cabinet functions merely as a somewhat distant advice-giving body with little collective significance in most administrations.

Table 4.14 US president and UK prime minister: comparing cabinets

US cabinet	UK cabinet
Serving members of the legislature barred from serving	Membership exclusive to members of Parliament
Presidential appointments subject to Senate confirmation	No formal limits on cabinet appointments
President decides frequency and regularity of meetings	Prime minister obliged to maintain frequency and regularity of meetings
Cabinet members are subordinate to the president who is in no way 'first among equals'; cabinet does not make decisions — the president does	Cabinet is a collective decision-making body
Cabinet members are mostly recruited for their policy specialisation: rarely do they move to a different department	Cabinet members are usually policy generalists: hence cabinet reshuffles
Cabinet members are often strangers to the president; no shadow cabinet	Cabinet made up of long-serving parliamentary colleagues and former shadow cabinet members
Cabinet meetings are often the only time some cabinet members see the president	Prime minister sees cabinet colleagues regularly in Parliament
No doctrine of collective responsibility	Collective responsibility usually applies

But the cabinet in Whitehall — and one really cannot call it the *prime minister's* cabinet — exists as part of a plural executive with the prime minister as 'first among equals'. The members are *ministers* because they have real administrative power vested in them. Like the prime minister, most are members of the House of Commons and their elective base is the same as that of the prime minister — elected by a constituency. The prime minister need gain no political approval for the cabinet appointments he or she makes. Far from being strangers, the prime minister and cabinet are likely to have served together both in Parliament and possibly in a shadow cabinet for some years before taking their seats around the cabinet table in Number 10. Some will even be regarded as the prime minister's potential political rivals. When Prime Minister David Cameron faltered in 2016, his Home Secretary Theresa May succeeded him.

The stark structural differences between the two systems mean that the cabinet in Whitehall is an entirely different beast from its namesake in Washington. Indeed, one could say that all they have in common is the name. True, many decisions in Whitehall will be made by the prime minister and a few close advisers, or in cabinet committee. But no prime minister could ignore the collective will of the cabinet the way an American president can, and hope to survive in office for very long.

Presidential and prime ministerial government

In both systems, allegations have arisen in recent decades concerning what some see as the unjustifiable increase in the power of the chief executive — it is argued that individuality has increased at the expense of collegiality, and that the executive branch has increased in power at the expense of the legislature. These are by no means new ideas. As we saw earlier, the concept of the imperial presidency dates from the early 1970s, and in Britain Lord Hailsham popularised the phrase 'the elective dictatorship' in 1976.

The concepts of 'presidential government' and 'prime ministerial government' both contain some truth, but they have tended to be presented in an overly one-sided manner by their most ardent supporters. Talk of the imperial presidency in America soon gave way to talk of the 'imperilled presidency'. And the idea of the British prime minister as an elective dictator seemed less convincing following the demise of Margaret Thatcher in 1990, and also of David Cameron in 2016. Likewise, talk of a 'golden age of the legislature' — whether in Washington or Westminster — may actually be slightly fanciful.

Furthermore, our understanding of the structures of government in the United Kingdom should make us cautious of describing the office of the prime minister as having been 'presidentialised'. In terms of what they can get done in the legislature, British prime ministers have always been in a much stronger position than American presidents. On the other hand, to call prime ministers 'presidential' in terms of their staff and support has always been very wide of the mark. The office occupied and run by Tony Blair, Gordon Brown, David Cameron and Theresa May looks nothing like the Executive Office of the President in Washington under George W. Bush, Barack Obama or Donald Trump. The offices remain different, mainly because the structures in which they operate are so different.

References

- Cronin, T.E. and Genovese, M.A., *The Paradoxes of the American Presidency*, Oxford University Press, 1998.
- Drew, E., *The Corruption of American Politics*, Birch Lane Press, 1999.
- Edwards, G.C., *The Strategic President: Persuasion and Opportunity in Presidential Leadership*, Princeton University Press, 2009.
- Fenno, R.F., *The President's Cabinet*, Harvard University Press, 1959.
- Finer, S.E., *Comparative Government*, Penguin, 1970.
- Healy, G., *The Cult of the Presidency*, Cato Institute, 2008.
- Hook, S. and Spanier, J., *American Foreign Policy Since World War II*, CQ Press, 2013.