



The Palgrave Handbook of Comparative Public Administration

Concepts and Cases

Edited by Murat Önder
Israel Nyaburi Nyadera · Md. Nazmul Islam

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Md. Nazmul Islam
Editors


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FOREWORD

The field of international and comparative administration currently has one or two excellent books that survey the range of issues that contemporary governments must manage. Not since the 2001 edition of the late Ferrel Heady's classic *Public Administration: A Comparative Perspective*, however, has the field had a collection of comparative cases from developing and developed nations to illustrate contemporary conceptual and practical applications of public administration. In the *Palgrave Handbook of Comparative Public Administration: Concepts and Cases*, Onder, Nyadera, and Islam have drawn together 20 such cases from across Asia, Africa, Europe, the Americas, and the Middle East. The editors and a group of gifted young international scholars complement these national cases with historical, conceptual, and methodological perspectives on comparative study, as well as a thoughtful discussion of the future prospects for comparative public administration as practice and as a field of study.

For my own course in international and comparative administration, I have desperately wanted a collection of cases such as the *Palgrave Handbook* to assign as readings to supplement the survey text that I use. I have always believed that immersing oneself in national and cultural contexts different than one's own is the quickest and most effective way to gain an appreciation for the diverse administrative systems that are found around the world. Given the current cost and difficulties of international travel, however, my students are about to learn that the cases in the *Palgrave Handbook* are the next best thing.

Over recent decades, technological development, globalization, and marketization have continued to shrink the world. Meanwhile, democratization, NGOs, and transnational civil society have attempted to advance a sustainable future for the developing world, while the COVID-19 pandemic, international conflicts, and authoritarian leaders have thrown up major obstacles to those goals. While traditional scholarship has focused on the legal, political, managerial, and occupational aspects that aspiring young public administrators need

for navigating governments in Western democracies, Onder, Nyadera, and Islam have reinforced that material with newfound appreciation for the religious, cultural, and institutional dimensions that are necessary to understand administration in developing countries.

International and comparative research and teaching are more critical than ever for sustaining public administration as a rich, vital, and internationally relevant body of practice and study. The *Palgrave Handbook of Comparative Public Administration* makes a welcome and academically substantial contribution to those endeavors.

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Introduction: Comparative Public Administration

Murat Önder, Israel Nyaburi Nyadera, and Md. Nazmul Islam 

The field of public administration is getting more international, supranational, and global nature day by day. With the influence and help of intense data crunching nature, subject and practice of public administration have gained more global perspective. Public administration being an interdisciplinary field by nature has also many dimensions to be considered. Noteworthy, public administration is not only a theoretical discipline, but also a practice that continuously affects our lives. Shafritz et al. (2017) adopt different definitions to capture the richness of “public administration” by clustering them

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into four main categories. These classifications include political, legal, managerial, and occupational. This book offers to include cultural, religious, and institutional dimensions to better understand public administration comparatively. All these dimensions are therefore captured and addressed together in country case studies section. With the political dimension, we understand that “public administration” is what government does, within its political environment and it is also about doing things that cannot be done well individually but collectively. In addition to the political dimensions, country case studies also cover the nongovernmental organizations (NGOs) and civil societies given their growing role in providing public goods. The legal dimension explores the foundations of public administration given that in most jurisdictions foundations of public administration are based on law and are bound by legal decrees. Public administration is law in action in the form of constitutional law, legal statutes, regulations, ordinances, codes, etc. Therefore, our approach also considers the constitutional framework of a country and examines how recent laws and regulations have been influenced by changes in management paradigms. The managerial dimension opens up discussion on the executive nature of public administration which enables the will of the public to be translated into action by the people responsible for running the public bureaucracy. In our analysis, we look at the legislative and policymaking processes and applications, local structures, and functions of public administration in a given country. In the occupational dimension, we examine the nexus between public administration and other occupational fields such as economics, medicine, engineering, and social welfare. Using the cultural dimensions, we encompass reflections of national imprints to the organizing and relations. Religion should not be disregarded when analyzing public administration since it has great influence in shaping the socio-political and cultural dimensions of a country (Islam & Hossain, 2020; Islam et al., 2020a, 2020b, 2021). Religion, despite its significance, we notice that most academic scholarly works tend to disregard its influence. In every country, we can find some strong institutions when we examine their historical experiences—for example, military bureaucracy in Turkey, nobility in England, big companies in USA, and some strong families in Philippines. It is within the framework of each of these fields that the political, legal, managerial, cultural, religious, and institutional aspects of public administration are transformed into practice by public administrators into the work of government.

Comparative public administration as a branch of public administration focuses on comparative analysis of administrative structures, functions, processes, and institutions. Comparison is not a new phenomenon. We have known that early philosophers and scholarly works have used comparative analyses. In its early years as an academic discipline public administration, pioneers in the study of American public administration, including W.Wilson and F. Goodnow, made full use of lens provided in European scholarship (Heady, 2001: 6). However, past and recent studies have drawn substantial inspiration from American models. Continuous search for efficiency and theories of public

administration after 1960s combined with emergence of new trends in public administration with the influence of many schools influenced by managerialism was basic motive in accelerating comparative research. The influence of Comparative Administration Group (CAG) sponsored by Ford Foundation cannot be ignored. The primary purpose of Comparative Administration Group was to formulate a universal comparative theory of public administration. And receiving early and generous funding from the Ford Foundation, which was about half of a million dollars, F.W. Riggs led many fieldworks, research programs, seminars, and experimental research projects (Rathod, 2007: 35). This momentum faced a challenge when the financial support and enormous technical assistance that researchers were getting started to reduce. Heady (2001) uses the honey-pot syndrome, to define the beginning of orthodoxy, with money and professional rewards. However, the problem was bigger than just losing the support of the Ford Foundation support. The underlying story here is that there's a multidimensional history to comparative administration study, and the CAG is just one chapter. There are both foundational ideas and mistakes to draw from evolution of comparative public administration.

Another common complaint about comparative public administration was its inability to build and establish itself as a field of study with a cross-national theory of public administration. Some scholars also criticized comparative public administration and argued that CPA examines the administration of public affairs in capitalist societies and CPA served the purposes of exporting products of capitalist countries together with the export of their administrative systems (Güler et al., 2009: 13–16). Another side of coin, Ford Foundation was accused by investing to advance capitalism as a counterpoint to the spread of Marxism.

One of the most important factor limiting efficient use of comparative study is the fact that administrative experience of different institutions at cross-national, regional, and local levels is based upon judgment of values and cultural bias (Rathod, 2007: 2). Focusing on theory building and generalizability of findings tends to ignore and/or disregard the unique situations in different countries. There are non-Western countries which have been largely ignored by scholars from Western countries because of ethnocentrism (Heady, 2001) or orientalism (Jreisat, 2012). Transplanting an alien administrative institution would be successful only if it is modified to suit the historical and social background of the country in which it is to be adopted (Rathod, 2007: 3). Jreisat (2005) articulates that today's public administration functions in a different time and faces different challenges, requiring new concepts and methods. We have to realize the massive influence of unfolding globalism, and comparative public administration opens the door for effective adjustment and transition from traditional, ethnocentric perspectives to a wider scope that integrates knowledge from various places and cultures (Onder & Nyadera, 2020b; Nyadera & Islam, 2020). Comparative research can also improve our knowledge of the administrative practices and other countries and adopt these practices which can fit better with our own nations.

We cannot fully recognize governmental systems or public administration unless we do know other systems of governmental and public administrations. We can know the basic structures of the institutions of a country and how the various elements of this structure interrelate to establish and implement public policy, but we cannot understand whether the institutions are really efficient, effective, democratic, or ethical without comparing them to the others (Chandler, 2014: 2). Of course, there are no absolute efficiency and effectiveness of public services which make it difficult to discern what could be required to produce perfect democracies or governmental systems. Therefore, it is only possible to make judgment on the effectiveness or ethical acceptability of the governmental systems that govern our lives if we are able to compare them. Different countries' governments might be less or more democratic, efficient, or effective than each other rather than measuring ideal situation. However, we should not lose the reality that comparison is more about a reflection mirror on ourselves, rather than focusing on projecting the said values on others. In other words, the notion that public administration is to be efficient, ethical, and democratic is taken for granted from our view, this is what cultural anthropologists learned in the 1980s.

Recently, cross-national comparative research has been on the rise and this has had an incredible impact on developing public administration theory (Jreisat, 2012; Onder, 2011) by drawing lessons from many different practices. There are various influential factors and justifications in revival and development of comparative public administration after short period of defunct and dispersion (Wart & Cayer, 1990).

1. **Globalization and transnational interactions:** Globalization pressures exerted by various forces have made comparative study more significant and relevant than before. Administrators in varied contexts find themselves working interdependently for the sake of economic cooperation and development, and their work thus increasingly requires awareness of the contexts in which their collaborators operate (Onder & Barış, 2017). This awareness arises most easily from comparative study. It is only through comparative research that we will be able to adopt and legitimize new institutions into current international order. While there are some common factors which may transcend the political, economic, and social context of local and national administration (Onder & Nyadera, 2020a), there are certain other important factors which are shaped by international economic situations (Rathod, 2007: 4).
2. **Social and technological developments** are equally important factors to consider when examining the increasing interest in comparative public administration (CPA) studies. Advancement in information and communication technology, machine learning, and artificial intelligence have made the use of big data more available and easier to analysis (Onder & Saygılı, 2018) in comparative study. Major socio-economic and political data collections, which have significantly improved over time, are now

- also regularly compiled by such institutions as the World Bank (World Development Report since 1978; “good governance” indicators since 1996), (UNDP; Human Development Report since 1990), and Freedom House (Freedom in the World since 1972) (Dirk Berg-Schlosser, 2012: 1). While the data may be more readily available and computerization makes it easier to gather and use the data, analysts need to understand the systems from which they originate to be able to make comparisons.
3. Comparison for the purpose of **prescription and promising practices**. According to P. H. Appleby, comparing and contrasting the administrative setup in different contexts would help to devote commonality of public administration. Students have also been increasingly showing more interest in comparative perspectives which in turn helps to bring richness in public administration learning and teaching. Comparative approach provides depth and breadth, significant for transforming public administration research, theory, teaching (Onder & Brower, 2013), and practices (Aydın et al., 2020). Comparison helps in theory building deductively or inductively by as scholars learn from different experiences. Comparative approach and methodology are central to both practical and academic aspects of public administration. As F. Riggs opines, “All Political Science and any scientific understanding of Public Administration needs to be comparative” (Riggs, 2002 in Otenyo et al., 2006: xxii).
 4. **Interest in good governance** motivates study. The New Public Management, which appeared in 1960s and became popular in the 1980s, has increased its influence on public administration and proposed effective transformation of the traditional public administration in order to achieve active and efficient state. However, after the decline of managerialism impact on public administration and the New Public Management because of critiques after the 1990s due to negligence of democratic processes and values, public service for citizens and the public interest which are main characteristics of the public administration got their legitimacy in the field of interest in good governance. Therefore, governance as an alternative approach has appeared and brought public administration back and closer to political science through what is known as locus and focus debate (Ayhan & Onder, 2017). In contemporary public administrations, governance paradigm has become a more successful approach in the theory and practice. This is because the governance framework brings with it values such as democratic processes, accountability, transparency, active citizenship, negotiation, and dialogues. Governance paradigm has been strongly supported by World Bank and United Nations, and other international organizations by funding governance projects (Yıldırım & Önder, 2019) have motivated comparative public administration research.
 5. As a tool for **self-reflection and theory building**. One of the salient features of comparative approach that is largely overlooked or underappreciated is the benefit it offers especially in reflecting back on what

is missed in one's own setting because it is taken for granted. It's not clear that this has been discussed much in the literature. Weick's (2007) article on the generative properties of richness touches briefly on this perspective. In order to understand and adopt things that are present in other cultures or contexts, it is necessary for us to engage on the richness, perhaps first of the foreign context, and then our own. A debate triggered in D. Lewis' (2015) article on abandoning the parallel worlds where he argues that we need to combine the insights of the two worlds rather than separating them is equally interesting. There are scholars who have emerged to challenge this opinion pointing out that we need to examine the underlying paradoxes, perhaps through an approach at Janus-facing logic (Howcroft & Wilson, 2003). The pursuit of the truth, assuming a singular objective truth, is a positivist orientation that seeks the mean in social conditions and in regression to the mean—and only the mean—in pursuit of generalizability, at the expense of diversity, variation, and richness. We can separate out two orientations pursuing substantialist vs. relational realities. Thus, the pursuit of substantialist mean is accomplished at the expense of considering reflective richness. But, does the relational necessarily provide tools for examining the taken for granted in the way that ethnomethodology does, for example? We need to note that we learn from our mistakes and from others' mistakes. This is a form of reflection.

This book is designed to study comparative public administration with reference to the changing forms and functions of public administration in selected countries. It helps to understand comparative aspects of public administration through the globe with recent developments in the field. The global context, the information revolution, and emerging democratization trends throughout the world starting with the fall of Berlin Wall to Arab Spring and pandemics are continuously reshaping the concept of governance and public management. The rise of economic power of China, struggle to keep the Europe Union integrity, expectation of the Western democracies that the USA maintains its global leadership role, and recent growth of Brazil, India, and Turkey are some examples of emerging powers and current issues. In this mercurial context, this book examines a broad range of issues relating the activities of public administration and governance in international settings. The book is designed to cover the classical concepts of bureaucracy, public policy and analysis, and prevalent research methodology in public administration from the lens of comparative public administration.

We will examine the public administration and related issues in the developing as well as in the developed context, while discussing its institutional embeddedness. In brief, the book provides an intermediate-level knowledge of comparative public administration, globalization, bureaucracy, public policy, country case studies, and comparative research methodology. The focus of attention will be on the methodology and philosophy of comparative public

administration with different cases. At the end of each chapter, key concepts and few discussion questions have been provided to capture main points and issues. The main aim of this book is to update current information about comparative public administration in theory and practices. As an academic discipline, public administration encompasses the study of establishing and maintaining public policy by government agencies, employees, and other stakeholders. We also take into account various applications, practices, and recent developments in different nations with our country case studies.

The summary of **objective of this book** is:

- to inform the students of political science and public administration with the fundamental concepts, definitions, approaches, historical development, and problems of comparative public administration and how they relate to contemporary issues throughout the world,
- to introduce country-specific administrative contexts,
- to obtain knowledge of contemporary global issues of comparative public administration research,
- to review comparative research methodologies and their application to issues of comparative public administration,
- to develop critical thinking skills and a deeper comparative understanding of the studies of human and societal behavior within the context of political science and public administration,
- to provide an opportunity for students to produce a research design for a paper that could evolve into a conference paper or publishable book chapter manuscript, and to get ample feedback on research design and other issues.

I THE STRUCTURE OF THE CHAPTERS

This book provides historical development, conceptual and theoretical framework, comparative methodology, and features of developed and developing countries' public administrations. It is intended to have three main parts: theoretical and methodological framework of CPA, country case studies, and comparison of country cases across the globe. It is not an idealist comparative book in terms of testing, developing theories, and making inferences based on the similarities and differences tests. It is intended to present structures of different country's governmental systems to show how each particular country's governmental system differs or is similar to others in a predetermined dimensions and comparative frameworks.

Part I deals with the conceptual, theoretical, and methodological framework of comparative public administration. Therefore, it provides common concepts, themes, and theories in the subfield of comparative public administration. Four chapters cover history of comparative public administration,

conceptual and theoretical framework of comparative public administration, and administration of developing versus developed countries.

I. Arefeen, M. N. Islam, and Ahmed. S. in Chapter 2 with title of “[Historical Development and Future Prospects of Comparative Public Administration](#)” seek to study the history of comparative public administration, and they consider some of the main explanations of the followings themes, history of administrative evolution, evaluation of comparative studies, development administration, comparative public policy, and development of comparative administration development and its future. They trace the public administration field to the ancient civilizations. Civilizations around the world had their distinctive public administration system with different nature and feature. They try to explain significance of PA and CPA from the ancient periods of Chinese, Egyptian, and Mesopotamian civilizations to Islamic administration under khalifa-e-Rashedah to Ottoman Khilafat, and, currently, the dominant model of the modern system of public administration in the Western countries has comparative aspects to explore. American, European, Asian, Chinese, Russian, and Islamic administrations have become valuable models/examples of studying comparative public administration in twentieth century and recent decades with the inception of academic courses, methods, and models with emphasizing the empirical concentration. The emergence and willingness to implement new paradigms and reform packages of public administration are notable examples of the current day efforts and the outcomes of the comparative studies. New challenges in public administration are leading scholars to be more comparative in searching new methods and models to meet the needs of the future public administration.

In Chapter 3, “[A Framework for Comparative Analysis: Public Administration Across the Globe](#),” M. Onder and U. N Zengin offer and design comparative framework to study country cases by considering administrative history, central and local governments, civil service systems, nongovernmental organizations, and recent developments and reforms. The comparison identifies similarities and differences as well as highlights successful implementations. There are various approaches and models in comparative studies, such as Weber bureaucracy model, Riggs’ Prismatic model, Downs’ bureau model, Dorsey’ information energy model, and development models. Furthermore, a variety of quantitative and qualitative methods and techniques are used to do this comparison. Creating and doing comparative empirical designs in social sciences might be limited in different social settings such as the equivalence problem. Social, political, and cultural contexts that have significant influence on administrations and institutions might dramatically reduce the reliability and validity of causal inferences. Therefore, drawing a comparative framework sometimes might be an alternative method of comparison where experimentation is not possible, to develop generalizations in research and/or to discover best or unique practices. Good comparison framework is based on previous research and experiences of the scientific community. Paradigms and models

developed by researchers are used as instruments to make healthy comparisons. This chapter aims to provide the most appropriate framework to evaluate how each particular country or administrative system differs or is similar to others. Therefore, it offers country case framework and explains the contents of specific topics, titles, and subtitles commonly used in comparisons to guide writers of country case chapters and make the case studies comparable.

I. N. Nyadera and G. Dagba Chapter 4 with the title of “[Public Administration Features in Developed and Developing Countries](#)” provide fundamental definitions and main features of developing and developed countries with different perspectives and examples. There has been an interesting aspect of comparison that offers a much grander macro-level of analysis between developed and developing countries. This level of comparison offers readers, researchers, and policymakers an important foundation of comparative public administration that will also guide them in understanding specific country case studies. It also offers deeper insight into the relationship between public administration and development. For example, Rostows’ (1990) five-stage development pattern gives a framework for understanding economic growth and the importance of comparing a country’s public administration is equally important. This chapter seeks to explore the relationship and trends between developed and developing countries’ public administration. The chapter begins with examining the characteristics of developed and developing countries in general and then identifies the distinction between the two categories of countries based on the level of professionalism, political distance, adoption of technology, participatory governance, public–private partnership, and degree of training, among others.

In Chapter 5 “[Research Methodology in Comparative Public Administration: Significance, Applications, Trends and Challenges](#),” M. Onder and E. Ayhan focus on comparative methodology in general and comparative public administration methodology in particular. This chapter evaluates the following topics for CPA research: the significance of comparative research, trends, and possible approaches (e.g., systems theory, process tracing), contextuality (e.g., social and political contexts, and integral operating system), use of methodology (e.g., quantitative/qualitative/mixed methods, levels and units of analysis, data collection and analysis), and methodological problems and challenges (e.g., case selection, construct equivalence, causality, value bias, and the availability of data). They warn researchers and students interested in comparative research to be aware of the fact that it is not an easy task to compare more than one country because of various reasons they provide in their chapter.

Comparative public administration as an interdisciplinary nature conceptually and methodologically benefits from other academic fields. Both quantitative and qualitative research methods are welcome to test current theories or build new theories and do in-depth analyses. Comparative public administration scholars as social scientists need to use a number of approaches, methods,

and techniques for the better understanding of the various problems and questions in their fields. Comparative method seems to be not used properly, and systematic knowledge creation is not sufficient in doing research in the field. Scientific study of CPA, like all sciences, requires finding answers for big questions of the field by using the most appropriate approach and methodology to be able to overcome possible challenges that might negatively influence objectivity or confirmability, reliability or consistency, validity or truthfulness, and generalizability or transferability of the research.

In this chapter, therefore, they explain and discuss how to do research in comparative public administration theoretically and as an applied. The chapter wishes to introduce you to the comparative method and related statistical and non-statistical tools in order to help you to reduce these hazards and to develop standards for you and others to gain a more sustainable view on the world. In addition, it provides you commonly widely used research models and designs that help to avoid the mistakes and biases. At the end, they discuss fundamental issues that might have significant potentials in contributing to researchers who seek to fortify theories and practices with empirical findings in CPA research.

The second part of this book focuses on **selected unique country cases** from all over the world best representing their continents. Nomothetic studies of public administration were emphasized here, but descriptive information about unique country case studies was not neglected. In nomothetic studies, traditional way of explanatory but supported by empirical knowledge of the institutions and dynamics of the society under study. The desire to provide a framework for understanding public administration in a wide range of countries is essential in this part of the book. Each country administrative system was written by native (mostly) country specialist/s and researcher/s on comparative studies. In studying country cases, administrative history, political context, constitutional framework, central and local governments, and their civil service system were covered. The impact of dominant recent paradigm, governance on recent reforms, and civil society relations were also studied. Earlier comparative country case studies rather focused on new public management reforms. This book contributes with governance reforms and situation of nongovernmental organizations in a given country.

The third part of this book aims to provide summary of comparison across the globe and finish with concluding chapter for future prospects. In comparative chapter with the title of “[Cross-National Comparison of Public Administration Systems: Selected Cases across the Globe](#),” we (M. Onder, I. N. Nyadera, and N. Islam) intend to provide comparison of selected country cases’ administrative systems; structures, process, and functions based on the comparative framework provided in chapter “[Public Administration Features in Developed and Developing Countries](#)”. Each country case chapter was designed to illustrate and explain a machinery of governments in terms of structures, process, functions, and behaviors in depth. However, the comparative chapter is more than a description of a specific government but aims

to compare countries' public administrations in terms of their administrative culture, structures of central and local governments, civil services, civil society, and administrative reforms voyages. We aim to create a platform for theoretical and practical comparisons between institutional structures, their historical developments, and functions by considering main similarities and differences without ignoring unique traits of them.

In concluding chapter of “[Conclusion: Future Prospects of Comparative Public Administration Scholarship](#),” we provided brief summary of the book, made a general conclusion, and discussed the future prospects of CPA in light of recent developments across the disciplines and world. Rapid and continuous technological developments, the demands of marketization, globalization, democratizations, and civil society have dramatically changed the nature of public administration across the globe (Köylü & Onder, 2017) and fortified the significance of comparison and hence comparative public administration. A global public administration perspective offers more opportunities and clearer understandings of the strengths and weaknesses of public administration process, functions, and global problems. Comparative research provides many advantages thanks to the emerging trends and developments, which will keep and even increase its significance in the development of PA and CPA scholarship in the future. However, comparative research is often blamed with poor accomplishments for lacking a “clear identity” as a practice and academic discipline, being fragmented, and not employing comprehensive methods to create grand theories in comparative administration. Some of the very common general threats and challenges of comparative research are traveling, language, and equivalence problem and data limitations on both the availability and quality. To be able to reply, new demands of the millennium with new technologies and opportunities, future comparative public administration research: (a) need to utilize more systematic and interdisciplinary cooperative efforts, (b) need to incorporate indigenous models and native patterns and applications, (c) need to benefit from cultural and contextual values, (d) need to balance the conceptual and practical concerns of the field, (e) need to develop middle range analysis and models, (f) need to use of multi-case analysis and multi-methods/hybrid methods, and (g) need to establish bigger and better data sets, necessary for a comprehensive comparisons.

This book with its theoretical and country cases will be used for undergraduate and graduate level textbook and a supplementary book for Ph.D. students in public administration, political science, and international relations academic and applied fields. Anyone whose job has something to do with other nations is expected to benefit from the book to understand comparative public administration and other country administrative systems.

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Conceptual and Theoretical Framework:
Comparative Public Administration



Historical Development and Future Prospects of Comparative Public Administration

Ikhtiarul Arefeen, Md. Nazmul Islam, and *Saifuddin Ahmed*

I INTRODUCTION

Public administration as a practice dates back to the beginning of the human civilization and continues to be a strong academic discipline and a driving force of public affairs in practice. Although comparative public administration is a more recent avenue of study as sub-field of public administration, its origin can also be traced back to ancient history of humankind (Farazmand, 1996). Numerous studies have already been conducted on the public administration system of ancient civilizations. For instance, Marcus Tullius Cicero, a

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prominent scholar in the ancient Rome, says that thinking about public administration, like, of the Roman Empire, great civilizations could not have survived if there was no public administration to run them (Ajdini, 2014). Given the strong nexus between civilization and administrative structures, there are many things in common and relevant to study using a comparative approach. Drechsler's (2013) contribution also shed a light on the comparative study of public administration as he identified three models of governance and administration, such as Chinese, Western and Islamic. While searching for ideal Public Administration practices, he compared the "global-Western" with the administration emerged from Chinese civilization which is mostly influenced by the Confucian thoughts and with the Islamic administration which largely represents the Ottoman Public Administration and its legacies in governance and administration.

History of Comparative Public Administration has been emboldened with the chronological development, along with the burgeoning branch of public administration both in academia and practice (Waldo, 1963). In the context of globalization that has traversed social, economic, political, and even academic spheres, it is important that we rethink the study and application "public administration" from different perspectives (Islam, Bingöl, & Nyadera, Islam, Bingöl, et al., 2020; Islam, Önder, & Nyadera, Islam, Önder, et al., 2020; Islam et al., 2021). To take into consideration the various changes witness in the last century across the world, this rethinking calls for assessment of theories and practices beyond American experiences. Equally important, it means that the study of "Comparative Public Administration" cannot be limited only to the study of the governments of foreign countries (Riggs, 1991). The subject of comparative public administration emerged slightly after the end of World War II and has continued to evolve "theoretically and practically." It particularly grew rapidly and reached a vertex in the 1960s along with the Comparative Public Administration Group (CAG) that was led by Fred Riggs and sponsored by the Ford Foundation. Its way had not always been smooth as it faced a sharp decline during 1970s in academia as well as it lacks financial support (Farazmand, 1996). This chapter outlines the historical development of Comparative Public Administration not just as recent sub-field of modern public Administration, but the ancient practices of it about how civilizations and empires had similarity in practice in their governance and administration. It also examines the chronological development of CPA in the recent decades as a sub-field and what are its futures prospects in the upcoming decades to even centuries.

2 ANCIENT PUBLIC ADMINISTRATION

Public administration and its practices during the ancient period range back to ancient Persia, Mesopotamia, Egypt, China and India, and so forth. India's, *Kautilya's Arthashastra* outlines a sophisticated administrative system at its time back to 321–296 BC. During the ancient period, statecraft was found

to be highly developed giving historians an important reference point to begin studies. Contributions of ancient civilizations to public administration have been naturally broad and comparative. For instance, Legacies of Persian Empire's administration have been identified by Farazmand (2002) as extensive and impressive and have had significant impact contemporary administrative systems. In the experience of countries that were colonized, there is a common trend that majority of the colonized countries adopted the principles of their colonizers to govern public affairs. Ancient societies in Africa were equally organized in a sophisticated manner that ensued leadership, authority, and separation of functions and duties were legitimate. These practices were embedded throughout the millennia. For example, Egyptian and Mesopotamian rulers used to work with these processes of administration with effective practice of representation and balance of power. Representation sometimes involves voting, if it becomes necessary (Tummala, 2009).

2.1 *Ancient Persian Empire*

The Persian Empire had one of the effective administrative practices that have greatly influenced many civilizations. As the Persians conquered the swaths of land in the known world, they were able to influence the administrative system enabling their legacies to spread widely. It is at the crossroad between the civilizations of the East and the West, from where it saved the Western civilizations and fostered the practices of governance and public administration, which have had significant impact on almost all nations, states, and empires followed by millennia. The legacies of the advanced administrative system of the Persian Empire also be found in the Western countries. These practices were passed onto them by the Romans and the Islamic civilizations of medieval times. For example, in the historic city-state of Susa and under the empires of Elam, Media, Persia, Achaemenids, and Sasanids, Persian Public Administration significantly developed, which were, later, adopted by the Islamic Caliphate. Their human rights practices were rich, for instance, "Achaemenid Persians never practiced slavery and, in fact, Cyrus the Great abolished slavery by issuing the first Human Rights Charter in the sixth century B.C." Under the Persian Empire, rulers and subjects adopted the advanced principles of organization and administration with emphasizing on the merit system, training, and professionalism where implications for modern administration can easily be found. "They also instituted a complex and democratic governance system with multi-institutional mechanisms of checks and balances with a universal justice system and undertook massive public works systems with giant projects" (Farazmand, 2002).

2.2 *Comparison Between Ancient Bureaucracies of India and China*

Ancient Indian and Chinese systems of administration and bureaucracy had developed and sophisticated practices with higher capacity and dynamism. The

characteristics, which notably represent the interrelationship between their socio-economic conditions and the bureaucratic development, can also be found relevant to the current globalization systems. Administrative experiences from Asia are sometimes pointed out as lacking dynamism and are autocratic with no implications to the modern systems, although these ancient bureaucracies are known to be effective. Kautilya's *Arthashastra* discusses the issue of "centralized bureaucracy and the ways about how to rule the conquered foreign lands either by war or negotiation." It is noted that to develop bureaucracy, conquering new foreign lands is important and necessary. In the ancient India, a lack of centralized bureaucracy was not a problem in its ways to development. Ancient China was able to successfully develop a highly centralized bureaucracy with efficient and trained bureaucrats (Islam, 2019; Islam, 2020; Islam & Cansu, 2020; Subramaniam, 2009).

Indian and Chinese bureaucracy had been in different course in ancient period. In China, there was a "collusion" between the rulers and the scholars. However, the rivalry between scholars (Brahmin) and the conqueror (Khattiarya) in India is a very famous in the discussion. It is established that the Indian Brahmins preferred to follow the "Confucian advice of providing independent service to competing princes," but in Chinese discourse, their experts and scholars promoted and advocated a flexible bureaucracy for a centralized administration/empire.

Given their long history as well as major changes they have experienced, the administrative systems of India and China have been the focus of the comparison. Subramaniam (2009) identifies three key factors that influences on the structure and the function of bureaucracy of ancient India and China: "(a) the relation of scholars to rulers; (b) the changing social structures; and (c) exposure to foreign invasion."

After the advent of the British East India Company rule in the Indian subcontinent, administrative changes were experienced at various levels. But, the important thing is that the Company rule also adopted and incorporated some practices of ancient Indian administration. For example, the post of a single administrative head, and at the district level, was simply transformed into the post of District Collector (DC). The DC used to be the key player who effectively assisted in sustaining British colonial rule in India for around 200 years. This evolution helps us to come to an understanding that the emergence and development of bureaucracies largely depend on the societal factors and forces that mainly refers to the "relationship between the rulers and the scholars" (Tummala, 2009).

2.3 *European Administration*

European administrative comparison from the past draws interesting findings, which shows that how the Church in Europe preserved the administrative and legal practices of Roman Empire throughout the history amid the decline and, after the fall of the empire. Societal changes took place in the long intervening

period before the emergence of the new shapes of state bureaucracies in the eighteenth century.

Europe could successfully keep itself out of the influence of the widespread expansion of Islamic rule in the eighteenth century and reorient the feudal aristocracy. Their conquest of world through forceful naval power had promoted the values and principles of capitalism that had impacted a lot on the economy of the world. Subramaniam (2009) evaluates these historical developments as late social transformation of Europe, which has helped to reshape its state bureaucracies that can be differentiated with ancient bureaucracy.

2.4 *Colonial Administration in Africa*

Before the arrival of the Europeans, there used to be two different systems those were followed by the African communities. One was “horizontal political systems” and the other one was “horizontal acephalous societies.” In the early 1800s mercantilist political-economic system had pushed Europeans, who were fiercely competing for markets and natural resources to seek control of distant lands. Combined with the desire to secure cheap labor, spread Christianity as well as land for large-scale agriculture, imperialism characterized the behavior of “big powers” at the time. Once the various territories were secured, it was important that some sought of administration was to be adopted. Colonialism was characterized by two forms of administration: direct and indirect rule. These practices made the experience of colonialism different from one country to another. Under the direct rule, European administrators were sent from their mother countries to go to the colony. These colonies were treated as foreign provinces of the European country. Under the direct rule, few locals were recruited to low-ranking administrative positions, and impact of European administration at the time was largely felt in urban areas. Under the indirect rule, European countries used local collaborators to exercise administrative functions in the colony. In many cases under the indirect rule there were few European administrators and investment in the colonial territory. While imperialism as a practice has been condemned and lacks legitimacy, some of the administrative structures used during the colonial era were adopted by the post-independence states. Partly this is because these structures were effective and were already in place at the time of independence. The negative experiences such as discrimination and marginalization of non-Europeans during the colonial period have left a dark mark of the era. In Tummala’s (2009) own words “while the British wanted to keep the Africans apart from themselves, the French wanted the Africans to emulate them. The Portuguese on the other hand wanted to do both. Whatever education that was provided to the natives was meant to train them to do some semi-skilled work for the colonial masters, and not because of any altruism. And to rule the colonies, different forms of administration, ranging from direct rule to indirect and company rule, were devised.”

2.5 *Islamic Public Administration*

The emergence and subsequent influence of Islamic Public Administration and governance practices spread far and wide and left their mark on many contemporary administrative systems (Islam & Hossain, 2020). The role of the Ottoman and Andalusia empires in spreading Islamic administrative culture especially in Europe cannot be ignored. Although the Ottomans were centric to current day Turkey, it had large impact on Central and Eastern European countries. However, this region does not give proper attention to the study and practice of Islamic Public Administration. Contrarily, it is thought that social and institutional contexts are deemed as obstacles to Europeanization and hindrance to the development of modern public administration.

There has been a dilemma in considering the place of Islamic Public Administration and this debate has largely been attributed with Islamic Public Administration is same as Orientalism. Professionals and scholars seem to be unable to distinguish between these two phenomena. Similarly, there seem to be little efforts to objectively explore Islamic administration without the bias of looking at the religious aspect of the approach. This issue of debate can be avoided by focusing on specific Islamic civilization such as adopting the discussion of Ottoman Public Administration as a case study. In the context of non-Ottoman administration and governance, it might be found among a circle as difficult to make Islamic Public Administration more understandable to apply, where Ottoman PA can be easily understood and made more contextualized for its legacy and practice. Although in the Islamic context, Islam is more acceptable for its wider scope and applicability.

Drechsler (2013) offers a hypothesis that Islam, being considered as a dominant and determinant context in the world, has a large impact on the systems, social lives, and so on. Where it is being practiced, Islam continues to have a crucial impact on public sphere of the societies and their governance settings through which they organize and manage every part of their life. This means that Islam as a pervasive and widely applicable phenomenon; it is one of the very important variables of Public Administration in Muslim and Islamic majority countries. Even if their society is found to be secular, Islam plays role as a vital determinant in every aspect of their public administration and governance.

Islamic Public Administration has its rich resources and history with countable traditions and practices in governmental affairs. There are literatures like "*Siyasetname*" (The Book of Government or Rules for Kings) by the Nizam al-Mulk that sheds light on state administration in terms of Islamic PA and governance and presents us with workable concepts for the improvement of governance. Central Asian and Middle Eastern countries have been benefitted from this great work by a great administrator in the Islamic history. "One important example both regarding equity and performance is the strong emphasis on the absolute non-delegatability of responsibility for those over whom one rules (1960, II, IV, VI). This was seen as a key feature also of

Islamic PA, even in the West, for many centuries, although today it is generally forgotten” (Drechsler, 2013).

2.6 *Public Administration in the Ottoman Period*

As part of the history of empires and their administration and governance, Ottoman Empire (Ottoman Khelafah) bears special significance. This powerful empire has its Islamic legacy and practices in its governance rules and practices (Onder, 2017). Drechsler (2013) focuses on the historic Ottoman PA in his study and finds out that beyond its central land of power, this empire has substantive influence on different regions they conquered or has authority over other lands rulers. Like, it was the ruler of Central and Eastern Europe, and even it fought and conquered Hungary, although it could not contain that huge swath of land for a long time but left significant impact on the administrative systems of these lands. Ottoman PA adopted unique and distinctive public administration and public policy practices during its time. It eventually left a legacy of its resourceful history in administrative systems that has bestowed upon modern with strong institutional base.

Evaluating Ottoman legacies and Ottoman PA provides us with insightful findings about its impact and implications for different institutional settings. The debate over Islamic Public Administration as whether it could be taken into consideration as role model or not, where Ottoman PA comes to become a powerful legacy in administrative systems and governance. Its applicability is also beyond question as it has been proven effective in the modern Turkish Republic in Anatolia and adjacent areas. Even, if further thought is expanded, it would be found that Ottoman PA is one of the most prominent models of Islamic PA in modern world, where all of the dynamics have been reshaped according to the thoughts of Westernization.

According to (Drechsler, 2013), the comparison driven recent studies by historians has provided an opportunity for the scholars to reassess the Ottoman Empire and its administration and governance. Those studies had found out that the legacies of Ottoman Empire are “not so bad” that importantly include its effective system of administration governance. It is worth noting that the Ottoman PA had always followed the reform initiatives like its Chinese counterpart, which is based on the thoughts of Confucius. These reform-based approaches had helped this great Empire to achieve time-bound modernization in its administration and governance and other affairs. “Ottoman PA shares with Confucian PA two crucial features for reevaluation today: its promotion primarily via the economic success of the main carrier country and its less than complete enthusiasm for this legacy by the elites in that country.” Assessment of this kind helps the scholars to identify the most effective factors and actors in the achievement of greater development like how Ottoman Empire have been assessed through various comparisons and studies. The Ottoman history and legacies and their importance make them more relevant to the application in different settings. It is appreciated as scholars and

practitioners appreciated the legacies of Constantinople, thus it is understandable that the countries in CEE which was under Ottoman rule and influence still have the opportunity to accept various ideals and practices of their previous rulers to adopt in their administration and governance even in today's time.

3 DEVELOPMENT OF PUBLIC ADMINISTRATION AS AN ACADEMIC FIELD

Modern-day public administration traces its roots from "The Study of Administration" by Woodrow Wilson published in 1887 which later was complemented by the recent academic works some prominent scholars in this field. "*Princepes d'administration publique*" by Charles-Jean Bonnin, which was published in 1812 in France, can be considered as the first modern book of public administration. While the study of the United States' public administration can be considered as the beginning point of the study of contemporary case studies with credit to the Woodrow Wilson's publication of the article, "*The Study of Administration*," in 1887. "*Introduction to the Study of Public Administration*" by Leonard D. White is also celebrated as being the first public administration textbook publication in 1926. Another breakthrough comes, when Dwight Waldo who introduced the first college course on comparative administration at the University of California, Berkeley, in 1948 (Tummala, 2009).

3.1 Comparative Public Administration as a New Phenomenon

At its onset as a distinct area of study, public administration concentrated only on the study of single cases. In many instances, the study sample was Western countries but mostly the administrative system of the United States (Riggs, 1962). Comparative public administration (CPA) is "the study of administrative institutions, processes, and behaviors across organizational, national, and cultural boundaries. CPA is a method of investigation and analysis that compares attributes and performance of administrative systems and subsystems as well as individuals or groups in positions of decision making to generate knowledge and enhance understanding of public management" (Riggs, 1962: 33). It primarily tries to develop the knowledge of administration while focusing on "administrative structures, functions, behaviors, and performance across organizational and cultural boundaries to improve reliability and applicability of administrative concepts and practices" (p. 34). It also aims to find out new patterns and principles of administrative behavior and action so that noble insights and new ideas and knowledge can be brought forth to enhance the existing journey of administrative practices (Jreisat, 2011a, 2011b).

The emergence of comparative public administration has helped to broaden the scope of public administration research. Although its emergence was recent, it had lasted only a short time after originated in 1960s due to its

own shortcomings. In the 1980s, some scholars took it very seriously to revitalize this important discipline. Indeed, efforts have continued to be made to advance the study of international public administration along with comparative public administration in order to capture the emerging dynamics of this field as a result of the process of globalization (Nyadera & Islam, 2020).

During the early 1960s, the emergence of comparative public administration gained momentum in the United States as “scholars of public administration began to concentrate on the administrative systems of various countries across the globe.” “Even though its roots can be found in the earlier administrative theories, comparative public administration is mainly a post- World War II phenomenon that peaked during the 1960s and the early 1970s.” This historical context and current need make it imperative to the scholars to take bold steps to incorporate comparative public administration with successful practices around the world so that it can be universal in solving the most pressing problems in this field (Bapuji & Rao, 2001).

3.2 *A Brief History of Comparative Public Administration*

Public administration is as old as the emergence of the civilizations of humankind and comparative study of administration has been an inseparable part of the history of the administrative traditions. As its sub-field, comparative public administration has been a recent phenomenon as a field of study that also has its origin from the ancient civilizations. Comparative studies have been conducted in social sciences for centuries. Aristotle is perhaps one of the earliest prominent scholars to use comparisons. He brought together the Platonic method of abstraction and the study of concrete cases. The most extraordinary example of his endeavor was dispatching his assistants around the Mediterranean historic to make the collection of the constitutions of the 128-city states. As a result, the cross-disciplinary masterpiece of “Aristotle’s Politics” came to the reality that greatly contributed to the human history till the date (Jreisat, 2011a, 2011b).

The emergence of Comparative Public Administration as an academic study does not go that much to back, but it is rather a new phenomenon. In the early post-World War II period, comparative studies were used to investigate and find out strategies that can be globally applied for better development (Riggs, 1954). At its early stages, scholars and practitioners worked out its definition, developed general theory while setting research agenda that helped to come to a common understanding based on the lessons learned (Heady, 1960). The study of public administration requires a more comprehensive approach to be comparative, otherwise, more generalized principles independent of their national contexts and settings cannot be achieved in the form of a universal “science of public administration” (Heady, 1966). However, the search for generalized principles is not an easy task it takes great effort, commitment, and objectivity to produce valuable comparative knowledge.

Methodological orientation of CPA has equally divided scholars. For researchers like Sigelman (1976) they put more emphasis on quantitative methods of study. But other scholars also emphasized on qualitative methods to analyze the relevant issues and cases. This CPA has had a strong influence to nation-states and their governments inspiring some to adapt more generalized administrative principles of the Western countries to make their administrative systems and bureaucracy more development oriented. Their replication of the Western norms and rules in their governments and other institutions has had greater success in some countries provide them the opportunities to achieve greater development although in some countries the application has not been very successful. As emerging market mechanism changed the course in 1980s, it led to a drastic decline in comparative administrative study due to its inclination to governmental institutions rather private ones. CPA would reemerge in the 1990s amid the fall of Soviet Union and the end of Cold War to analyze regime changes around the world and governmental transitions through different means (Fitzpatrick et al., 2011), and rapid globalization (Jreisat, 2011a, 2011b).

The case of American Public Administration is significant in finding a starting point of comparison. Comparison of countries public administration systems can include examining the evolution and constitutional features of a country that provides among other things provisions to the form of government to be adopted as well as the principle of separation power between executive, legislature, and judiciary, relations between central and local government, bureaucratic structure, historical development of administrative reforms among others. Riggs brings the issue of empirical comparative study with other presidential and parliamentary system of governments around the world to further improve the American presidential system and to make it more functional. Although he said that, many useful practices of parliamentary form of government cannot be taken account in the United States because of difference that lies with the nature of the presidential system of America (Riggs, 1991).

The key concern of comparative public administration is the different patterns of public administration in the nation-states those emerged from rich and renowned historical backgrounds and also have the exemplary issues to be followed by (Onder & Nyadera, 2020a). Scholars and researchers in CPA have continuously been keen to search for a framework(s) to analyze the global systems on a comparative basis. They are confident that if more advanced “administrative technologies” from countries with sophistication in this field could be transferred; administrative problems of the developing countries would be easily solved with special attention (Heady, 1998).

3.2.1 Comparative Administration Group (CAG)

Since its formation in 1960, the Comparative Administration Group had been the central reference point of comparative administrative movement and flourished under the leadership of Fred W. Riggs (Heady, 1998). Riggs (1976)

outlines the role of the Comparative Administration Group (CAG) as it spearheads the Comparative Administration Movement during the 1960s. Despite its leading role, CAG came under scrutiny for various aspects. There are critiques who consider CAG as “acting to strengthen the hand of American imperialism and to betray democratic and liberal values; and on the other hand, there are those who emphasize its important role in sponsoring empirical based studies or generate operationally useful ideas.” These contradictory positions refer to a “practical dilemma”—opposing government’s operations while drastically slashing the support for further research. Even though the group was facing contrasting views and being dissatisfied with the ongoing paradigm of public administration, the founders of CAG had a consensus on the continuity of the search for new frameworks with “empirical studies and operational programs.”

The CAG had received a very handsome amount of sponsorship from the Ford Foundation. However, comparative and development administration faced major setback in the 1970s, and amid its major achievements, it declined due to lack of academic and financial support. Nevertheless, the above-mentioned sub-fields of public administration experienced a resurgence of interests since the 1980s, the scholars and their scholarly and impressive works emerged and continued to increase at a new pace. The trend of the reemergence has had a very significant impact on the new and growing problems and concerns in these fields in the days ahead (Farazmand, 1996).

3.2.2 *Contribution of Comparative Public Administration*

The comparative administration alongside with the development administration has significantly contributed to the development of the general field of public administration since the end of World War II, and it has continued for decades. As a core issue of the discussion, comparative public administration and development administration have been categorized as the key force of domination of the world capitalist powers that mostly refers to as Western countries. It tried to counter the spread of socialism and the expanding influence of Soviet Union worldwide on developing and least developed countries from Asia, Africa, and Latin America (Farazmand, 1996). Comparative Administration Group has been immensely appraised for its significant works and achievements in the fields of comparative and development public administration. Another criticism that CAG faced was its biasness toward non-Western cultures through its many studies. Its major failures also include aspects that are disturbing to democratic rights and stability and opposing to people’s empowerment and participation. It has drawn criticism for favoring the dominant world powers mainly the Western countries in its various studies against the comparatively weak poor nations around the world; thus, CAG has been accused “Scholars and critics of this field have pointed their objections to the CAG and the movement for comparative and development administration as they have contributed “to the promotion of antidemocratic regimes

in repressing their peoples and to making the conditions of poor developing countries worse” (Farazmand, 1996).

3.2.3 Section on International and Comparative Administration (SICA)

The Section on International and Comparative Administration (SICA) existed for years to work on the concerned field as one of the organizations of the American Society for Public Administration (ASPA). The origin of SICA followed the abolition of the two entities of ASPA—the Comparative Administration Group (CAG) and the International Committee. Later their functions were merged into one single and new entity called SICA.

Since its creation in 1960, the Comparative Administration Group (CAG) has been the central point of action in promoting comparative administration movement as a larger scale movement. The steady growth of this group occurred under the direction of Fred W. Riggs for more than a decade. On the other hand, the existence of International Committee had considerably been longer under the leadership of several different chairs, one of the most notables is Charles Ascher, while it also experienced rise and fall in terms of the level of its program and changes of focus in activities. However, the maintenance of ties of the United States with the organizations such as the International Institute of Administrative Sciences became very consistent in its area of interest. Heady held the position of the chair of the committee during the formation of SICA. The assumption of the consolidation of the two groups was based on the advantages that could be gained by the combination.

According to Heady (1998) SICA did not succeed to bring comparative and international public administration together in its long-term mission. Although it had it was in existence for about 25 years, it could not accomplish any meaningful achievements. The main reason for this failure is that the two components had not been well joined together to function effectively. Due to the differences in the “intellectual History” of comparative and international public administration, the two distinguished sub-fields, the task of bringing together could be considered as a very complicated one. Amid this complicated journey, SICA had the mandate that could provide benefits of integration in the areas of overlaps and problems. Nonetheless, there was hope that if SICA could reorient its focus slightly, then it could facilitate and lead a very progressive and rigorous change in these two sub-fields.

The focus of attention of SICA has frequently shifted as its chairs and executive committee members change, as per Heady. The variations are there in the focus of chairs as some of them emphasis more on comparative approach and some prioritize more on international perspective. That’s why it is found that majority of the SICA projects focus on either comparative or international perspective (Heady, 1998). There are few of them those aimed at studying the existing relationships between these two strands of administrative issues or their integration. The systematic proposal of Heady could be considered as an attempt not to assess the contribution of individuals in SICA as these

are significant but not focused on the ultimate results of SICA. Although they ought to be invested in the interconnections between the issues of international and comparative administration, in 1989, Heady concluded that these two fields of interest got separate attention and had not been focused on interconnections in the past. It is the gradual effort for convergence that could be of benefit to both the international and comparative component in the studies of public administration.

3.2.4 Comparative and Development Administration

Comparative and development administration are closely related to each other and have been the subjects of interest for many scholars. These twin fields of administration are directly interlinked, and they have close relationship with the multi-disciplinary fields of political science, cultural anthropology, and economics, thus, the multidimensional study of comparative and development administration is evident. Before World War II, this linkage began to blossom; however, after the war, the studies have started to flourish in a formidable pace. One of the most important phenomena was the emergence of newly independent nation-states. The new post-war nations and the former colonies started to adopt development plans in their national level plans. Their plans and strategies for the economic development began to get momentum. But the important issue started to come out was their lack of institutional and administrative capacities to hold onto those rigorous national action plans and to carry out mammoth development activities to implement those plans. Therefore, it provided the chance to the experts of public administration and development from the United States and the Western European countries, the so-called developed nations, to give the advisory and other material support to those countries to conduct their development projects (Heady, 1996). This advisory and technical support in the development has helped the development administration to become an opportunity to grow it as a field of study and practice.

The increasing interest of scholars in development administration as a core component of comparative administration has been appraised by many scholars from the general field of public administration as it expanded both academically and methodologically in the large field of academia. In particular, the topic of development as field of study had been methodologically wide open for rigorous academic studies, while it had become a conceptual tool to produce new ideas and the learned generalizations that could contribute to the history of the humankind and the development of civilizations. This contribution had become evident with an institutionalized organ that developed by the 1960s when the study and practice of development administration became formal and concrete (Farazmand, 1996).

3.2.5 Criticism of Development Administration

Criticisms directed toward development administration also touch on comparative administration because of their interrelationships. CAG was bluntly

scolded by Garth Jones (1976) as being appropriated and then obfuscated. His views have helped us to understand different aspects of the criticism that are made to development administration. He praised the CAG writers and their works and recognized that political and administrative reforms are interlinked and cannot be separated. The ways through which the CAG dealt with development administration have little room for approval to go ahead.

Another criticism was directed by Jones to CAG on its use of development administration shifted from comparative administration was a pretext to secure more funding for research. This shift of focus of CAG had been criticized as a manipulating device to drive more money to its funds. The CAG was in effort to make the development administration more marketable to Ford Foundation as they were the principal funder of the organization and its several projects. This organization also made the definition of development unnecessarily difficult although it was not that much so. Jones states that he can understand some of the earlier writing on development administration, but the CAG volumes under review raise the questions whether the concept is that entire complex, and whether after twenty-five years we still need to be talking about “frontiers” of development administration. As he sees it, development administration is a subject that has been “captured by a few political scientists,” with only a few of them having extensive administrative experience or government service.

Moreover, they fail to provide a practical way to “reform an archaic accounting system, integrate new national planning methodology within a dynamic administrative program, organize and administer a new national family-planning effort, or design management operations for a new irrigation system.... ” (Jones, 1976). In conclusion, the accusation to the CAG was mainly the adoption of development administration for its own good, not for bringing any meaningful solution. It actually could not contribute that much to the development problems and their solutions. Rather, it stayed away from the real-world practical problem distancing itself from any field level solution-oriented measures (Heady, 1978).

3.3 *Comparative and International Public Administration*

Comparative and international public administration is closely interlinked for their nature and practice. International and regional cooperation agencies or organizations are the key examples of international administration; thus, it is found to be concerned with “the administrative operations of agencies created by sovereign nation states as instrumentalities for international or regional cooperation.” The need for international administration was materialized with the establishment of the League of Nations by the world powers in cooperation with the nation-states after witnessing the devastating effects of World War I. This initiative laid the foundation for current and future models, depending on the variety and magnitude of work area in the respective organization. This should be in line with viable options of international

cooperation among the countries as different regional and international cooperation, regulatory, and other organizations have flourished worldwide. On the other hand, comparative public administration is “concerned with patterns of public administration in different nation-states, using a variety of historical and contemporary examples.”

Scholars from different backgrounds have tried to study comparative public administration but a majority of them are often affiliated with public administration as their academic specialization. A significant number of them have experience working abroad either in military or in participation in post-war technical assistance programs. In addition to political science, they often drew on sociology and economics. Educational preparation was dissimilar in the two groups as were their methodological preferences and their research agendas.

The goal of comparativist scholars is to try and find a framework that would allow them to analyze the comparisons on a global scale. One of the most notable facts is that they are very enthusiastic to search for a universal strategy to deal with problems around the world. These people have interest in the study of the administrative problems of newly independent nation-states, as they were also known as developing countries. They were confident that if administrative technologies could be transferred from advanced countries to the developing nations, their administrative problems could easily be solved. However, they were caught up in a situation where it was not possible for them to agree on a paradigm that would be workable for the field or a consensus on their studies that could be claimed as “scientific.” Those who studied international administration were caught up in the prolonged debate between “idealists” and “realists” that characterized the literature of international organization during the decades following World War II. To an even greater extent than in the case of comparative public administration, commentators often viewed the international sub-field as being in a state of disarray during the 1970s and 1980s. For example, Rochester (1986, 790, 798, 812) discerned a pattern that was leading to the brink of collapse and “a virtual loss of identity of the field.”

The studies of international and comparative public administration have led to the development of various literatures by various groups in the concerned field. Each group generated an extensive body of literature but focused on a different set of administrative entities. There was little uniformity in their approaches, slight acknowledgment of work being done in the other sub-field, and a different set of outlets for publication. The paths are rarely interconnected. Interaction and coordination in between these two fields cannot be called as up to the mark at the utmost sincerity. Most opportunities for direct association of persons from these two specializations came not through their research efforts but through their memberships in affiliates of major professional societies at national and international levels. But such interaction was sporadic, infrequent, and not very effective in bridging the gulf (Heady, 1998).

3.3.1 *Frameworks for Study of Comparative and International Administration*

By the early 1960s, Heady (1962) had identified four categories of comparative cross-national administration studies, all of which in his opinion continue to have some current relevance. These include: “modified traditional, development administration, general-system theory, and middle-range theory.” Over time, the major options in comparative administration have been narrowed to a choice between “general-system theory” and “middle range theory.”

Given this record, Heady (2001) says that he does not see much hope for trying to identify a single framework for study that could be used in both comparative and international administration. Something might be gained, however, by examining more closely what seem to be opposing tendencies over time in both cases. Comparative administration, while continuing to have advocates of various approaches, has moved significantly toward an acceptance in practice of the bureaucratic focus for making comparisons. On the other hand, international organization/administration analysts, as described by Rochester, have less agreement on a model.

3.3.2 *What Subject Matter and Regions Are Studied?*

Scholars of the comparative and international administration have focused on different subject matters in search of a universal principle for administrative development. Researchers involved in comparative studies addressed variety of subject matters in the first decade of the twenty-first century. Fitzpatrick et al. (2011) summarize the most common subject matters that dealt with some issues to study comparisons among different actors and factors. The authors found that in one in five articles, the issue of “*reform and accountability*” was studied. Although bureaucracy and personnel management were also common areas of study in the comparative research in the past and were used by the experts to code the topics, less than ten percent of the articles addressed these topics in their studies. If it can be looked back to the early research history of comparative public administration, personnel administration and management, bureaucracy and politics were covered to be the most common topics, while most among the most was bureaucracy, the most common concern of the researchers at that time regarding the study of administration.

Besides, studies on comparative studies have increasingly focused on another area which is the “*unit of analysis*” in their research. Traditional studies of comparative public administration have taken into account the country cases as the unit. However, according to its definition, comparative research can cover expanded areas like continents, regions, cities, states, or provinces as its unit of analysis. Previous researches have also helped us to shed a light on this issue of what things have been very useful to use as a unit. It is found that researchers had used various units of analysis to examine the situation, where the most common unit was the countries. In addition, they also had used continents, states, provinces, cities, or regions as their units of analysis for the study of comparative administration.

While studying the administrative systems comparatively in different settings, most of the authors use the countries as units of analysis. On the other hand, few of the authors try to expand the search beyond the country cases. A common question that arises for researchers conducting comparative studies is which country should be selected for study. The answer to this question is in the history of comparative administration. Examining past studies on comparative public administration, it is evident countries in Europe and the United States have been the dominating unit or the area of study in the research of comparative public administration. Most specifically, the United States and the UK are the most common and the dominantly used case studies in comparative public administration.

Looking back to the major comparative studies conducted, there was trend to turn the focus to the study of developing countries. However, it has also been observed that a significant shift occurred in the comparative studies to the European countries considering the unique and expanded role of the European Union. This organization had also been very influential in reshaping the post-communist-countries. The topic of development has also become a key issue of study by researchers but could only be examined on few cases while African and South American countries could hardly be found in the comparative studies. That means the subjects matters and their units of analysis most focused on the developed nations.

3.3.3 *Focus of Development Administration as Part of CPA*

The development administration as part of the comparative administration has its own based on the interest and needs of the actors and factors all over the world. Farazmand (1996) summarizes some of the most important issues based on which the focus of development administration achieved its growth. He identifies the reflection of “financial reality” as an important focus area in development administration. This is attributed to a number of issues which include but not limited to; (1) the developmental needs while mainly focusing on economic ones, (2) variety in the needs of developed and developing countries, (3) the prospect of administering development, (4) knowledge and skill of development, (5) the potentiality of changing nature and vulnerability of less developed nations in terms of politics, society, economy, and culture. As well as (6) the desire of the developing countries to become like the Western nations by adopting their policies and strategies as they play role model in industrial and other comprehensive development.

The elitist approach which was adopted in developed countries were used in development interventions. The idea was to focus on Western economic, political, and cultural values that push developing nations to a more Western-oriented transformation. This means adopting policies that are in line with market-based, elite-controlled, and value-driven change. Prominent scholars of CAG also promoted these values to empower the administrative elites. This eventually led to the growth of authoritarian leaders with a controlled bureaucracy and high Western orientation. This promotion of the intervention of

elites was not without any intention, rather this approach tried to enhance the power system in the developing countries and to spread strategies to create and support a group of strong local elite class. However, the masses of those countries were not given the attention as was given to the power elites. The real reason behind this was to make the spread of the public administration of America forceful to the third-world nations amid the context of the Cold War (Waldo, 1992).

According to Heady (1996), he considers bureaucracy as the primary focus and the vital institutional base for the comparative study of public administration. Bureaucracy is the building block one of the most important component of public administration. Apart from this, CPA scholars have also suggested that other factors such as non-bureaucratic, non-governmental, grass-root organizations, and so forth must be taken account while studying public administration. They put emphasis that these types of local organizations and other indigenous and cultural factors that are unique to the respective society should get the utmost importance as they are very important focuses in the study of administration. Developing nations have different characteristics and historical backgrounds, thus, not always compatible with the application of Western values. Eventually, it is sometimes found that the Western models of bureaucracy and administrative systems are problematic that their values and principles cannot always fit the different nature and peculiarities of developing countries. Thus, the intervention of “elitist, top-down approach” among the developing nations in their development administration might produce negative consequences rather than positive one.

3.3.4 *Decline in Academic Interest*

After experiencing a rapid rise, interest in comparative and development administration began to decline in academic field. One of the most important reasons for this decline was the loss of interest by the funding institutions and agencies in supporting research and training projects of development and comparative administration in the 1970s. Eventually, this negatively affected the academic interest to pursue similar studies in public administration. The outcome was a major blow to the growth of the field and the sharp decline in the study in the twin fields. Most notable example was the closure of the once popular “*Journal of Comparative Administration*” as it went out of publication. Although its scholars and owners tried to keep it alive by renaming it as “*Administration & Society*,” it had to change its focus that no longer reflected its earlier spirit, themes, and literature.

Amid the decline in this field, however, some efforts have continued to ensure that CPA-related research carries on with. Some of the notable initiatives are by having led to a reemergence of competitive journals and publication outlets for CPA.

For example, the focus of the British royal “*Journal of Public Administration and Development*” remains on development. Another initiative is the “*International Journal of Administrative Science*” that concentrates on

publishing “articles on comparative and development administration with special attention given to developed as well as developing countries. In the United States, *International Journal of Public Administration* and *Public Budgeting and Financial Management: An International Journal*” could be considered as one of the key journals in this field (Farazmand, 1996: 352).

3.3.5 *Crisis Period of Comparative Public Administration*

One of the biggest challenges facing comparative public administration is that it has failed to institute itself as a field of study and to address the important topics of this field. Another crisis was the failure to reach at a consensus to pay attention to “empirical studies designed to test existing theories about cross-national public administration” (Heady, 1978: 359), despite of its inclination to theorize the concept.

Keith Henderson (1969) considers CPA as facing an “identity crisis” because of various reasons and also questions about the scope of comparative public administration. By observing the diversity in the titles of the publications of CAG, he stated that “there are certain dominant themes (e.g., the developing countries, the political system) it is hard to know what the central thrust might be and equally hard to find anything distinctly ‘administrative’ in that thrust. Seemingly, the full range of political science, economic, sociological, historical, and other concerns is relevant.” Later Jreisat (1975: 665) opine that “the absence of integrative concepts and central foci in comparative research and analysis” as a critical problem manifested in CAG literature, indicating a “wide range of seemingly independent concerns.” Acknowledging that there were reasons initially for such “kaleidoscopic development,” he found such justification to be less convincing after two decades of research.

Lee Sigelman (1976) reaches the conclusion that only minimal progress has been made by comparative public administration as a social science field. While reporting on the *Journal of Comparative Administration* and the content analysis of its whole output, he could not find much diversity. Although it is the key avenue in this field for the scholarly publication, articles embraced “an astounding array of topics,” suggesting to Sigelman that “students of administration have yet to narrow their interests to a manageable set of questions and topics. A substantial amount of their effort continues to be spent in activity that can best be characterized as ‘getting ready to get ready’-exploring epistemological matters, debating the boundaries of the field, and surveying the manner in which concepts are used.” Jones has remarked even more acidly that the CAG movement “never got much beyond the researching of the definition stage of the subject. Some would say it did not even reach that stage.”

This scenario makes it clear that students and scholars of comparative public administration have shown interest in developing the concepts and theories in CPA. However, the extent to which these theories and concepts can be empirically tested or universally applied still remains unclear. Savage (1976) gives a typical summing up, arguing that existing literature “displays a mélange of idiosyncratic theoretical formulations and organizing perspectives, many

of which have more to do with academic or personal fancy than with any generally acceptable cumulative purpose” (Heady, 1978).

3.3.6 *From Traditional to Post-Modern Public Administration*

The journey from traditional post-modern public administration unfolds a dramatic contribution of administrative systems to human history. It is true that the contribution of public administration and bureaucracy in the development and growth of civilizations is significant. The historical development of different concepts and techniques substantively contributed to the progress of public administration. The urban design and planning were developed by the Sumerians and Elamites (early Indians) alongside with the development of the first-ever prototype written scripts or languages that helped humankind to record their past by using the invented tools. By these earliest languages, many empires in the world were benefited in their administrative systems and bureaucracies that continued to flourish onward. Some notable examples include the Egyptians, Assyrians, Babylonians, Greeks, Elamites, Persians, Medes, Chinese, and Romans, which achieved significant development in the administration. Surprisingly, the concept of “development” was at the core of all of these civilizational administrative systems. This is because of their quest and strives for improvement in governance, military, the economy, and society for humans. All major civilizational powers and empires constantly pursued the variable of development in their functions. Ancient empires used to undertake massive public works projects including the construction of service facilities like roads, bridges, canals, palaces, communication, monuments, temples, and other enterprises. For instance, the Egyptians developed medicines and built Pyramids. Babylonians constructed fortified walls to protect themselves from outside invaders and also developed written administrative records for managing public affairs. “Chinese built the defensive walls and contributed to civil service examination systems. Greeks developed art, philosophy, governance theory, and the ship-building profession. Persians built the first universal empire with the largest administrative state on earth (with about 10–12 million state-paid personnel) legged on a centralized, professional bureaucracy notorious for its efficiency” (Farazmand, 1996).

The ways through which scholars are looking at administrative issues and problems now cannot be called as sufficient that would be able to propose solution to those problems. The traditional principles of public administration can be compared to a chef’s use of culinary cookbook. However, they do not consider the trends, norms and values, and so forth and any transformations that have taken place. This is because, it is very natural change to occur, and thus it needs to be taken into serious consideration while studying or deciding on any administrative issue. This perspective actually resembles Maslovian’s view of needs, which stresses that anything which is relevant and applicable in one country or society at one time might be irrelevant or unnecessary in another place. This scenario has helped the scholars to come to a conclusion that the traditional principles which are promoted as role model of public

administration have limited scope, relevance, and applicability to the problems of the developing countries. Those principles were “originally designed to meet the needs of certain Western industrialized countries-notably the U.S. itself-within the ecological parameters of their own total environments” (Riggs, 1980: 111).

Civilizations around the world had developed their own ways of administration and, sometimes, they adopt others’ successful principles to further enhance their administrative capacities. The administrative development and human civilization were integral part in their historic journey.

Undeniably, “administration and civilization have existed side by side and nourished each other. Both were integral parts of human progress. Civilization promoted administration and administration made civilizational achievements possible. Both have contributed to the development of each other for civilization and administration always have been and still are intricately joined” (Waldo, 1992).

4 FUTURE CHALLENGES OF CPA AND DEVELOPMENT ADMINISTRATION

Future challenges for the twin fields of comparative public administration and development administration seem to be many and should be cautiously examined for deciding on the upcoming agenda. Amid these circumstances, several trends of these fields have already emerged, and many more will come out in the future. Farazmand (1996: 35) identifies some of the very crucial challenging issues for the future of comparative and development administration.

1. The rise of the aspiration for more democratization of the institutions and the expectation among the people for better opportunities in the developing nations while also demanding for improved human rights and less repression.
2. The emerging number of women’s participation in politics and administration because of the high rate of education that is contributing to the change in the patterns of public administration and has helped to bring out the best from the traditional aspirations and practices of the society.
3. Globalization through greater global cooperation gives more spaces for diversity and inclusion while considering exclusion as opposing to development.
4. The growing role of the United Nations as a tool of the world superpowers to dominate the less developed countries and the UN as the global bureaucracy with the leadership of global powers specially, the permanent members of the Security Council and some other European countries.

5. The issues of centralization that means “the corporate and international military powers” centralization and providing the state-of-the-arts “technologies at their disposal,” where “decentralization” means the promotion of “ethnic, religious, cultural, and other factors” among the nations that cause division and makes the control easier (Farazmand, 1998: 1657).
6. Increasing demands for professionalism in bureaucracies, public services, not-for profits, and profit-oriented organizations so that the system can produce more advanced elites in managerial and administrative level cadres, while promoting the capacity for advanced managerial skills for development purposes.
7. The rising interdependence and bilateral and multilateral ventures that promotes opportunities for the developing countries, but at the same time, increases their dependence on the big partners.
8. The expansion of the horizon of comparative research in public administration, national and international problem solving, strategies, multi-national cooperation, and related issues.
9. The emerging reality of less American and more global, like US parochialism and ethnocentrism in the theory and practice of public administration, is no longer the only dominant fact here, but there are other models of countries and their practices that are regularly penetrating in the information hub of the study of administration. In this new global reality, the American Public Administration has faced a change and needs to adopt new ideas from outside of their sphere. Americans are now and in the upcoming days in a position that requires accepting the transformation of the countries or regions.
10. The concept of “sustainable development” and its related forces have compelled the theorists and practitioners of public administration worldwide to rethink about their agenda for the future as it has even largely changed the definition of the development and its criteria. This new paradigm has required the global community to the redistribution of resources, responsibility, and power among developed and developing nations. It gives the countries around the world to live with equal balance and opportunity where not only the developed nations, but also the less-advantaged nations would have their due share.
11. The trends of revolutionary changes that pressurize on the governmental and administrative systems to change accordingly are new phenomena. By democratization, peoples’ participation in political systems and governance processes are huge and increasing day by day, which is creating forceful demands on bureaucracy to bring forceful reforms in the governmental and public service sector. Religious and secular version of public administration has become a competing issue in different countries that are also creating pressure to adopt radical changes in public administration.

12. In the New World Order and the potential change in the power balance have led the theorists and practitioners of American public administration to become more conscious about their future, because their effectiveness of administrative values and principles is likely to decline, thus, American influence will be diminished. The US system will likely adapt with new realities and adopt global learning in their long historic administrative systems. It can be called as the mutual influence at the international level.
13. The disappearance of the myth of the dichotomy between “politics and administration” and also between “policy and management” as they have been evaluated as more harm than good for the field of public administration both in academia and profession. Comparative analysis and shared learning are going to be the reality in this field.
14. The interest in the development of the concepts of “organizational elite theory” and “administrative elite development” is likely to increase to empower the stakeholders in the power structure. For example, these things will enhance the role of power elites, and at the same time, will empower the masses in the participation of decision making and governance as well. The people will be more conscious about their role in the power play; thus, the traditional elites and their influence will be diminished while their collective power will be diffused. If anything, contrast happens, a revolution of the masses is a likely reality.

The above-mentioned challenges have compelled the scholars and practitioners to adopt a common ground that administrative reforms have become a necessity to respond to the new demands of the societies. Particularly, in the developing countries need training and personnel development as indispensable steps to accelerate the reforms, thus, a gap between current reality and the desired conditions can be closed (Jreisat, 2011a: 50; 2011b).

4.1 *Search for New Paradigms*

The study of the history public administration includes searching the evolution of institutions, their structures, theories, and practices. Studying the history of administration and governance systems provides scholars in this field to look beyond the modern-day practices and helps them to explore the roots of public administration from ancient time, civilizations, empires, and states. It also helps to develop a comparative scope for bridging between old and new theories and practices that can significantly contribute to our existing problems and prospects.

Fitzpatrick et al. (2011) condensed the needs to search for new paradigms of comparative study. Any governmental capacity building and development require the study of Comparative Public Administration. By following the comparative approach, the parochialism of the US Public Administration in theory, practice, study, and teaching can be counteracted. Comparative study

can bring new avenues for the scholars and practitioners to conduct researches on the differences in contents and contexts of institutions, administrative systems, and culture that would lead them to identify uniform principles to follow in the public administration of different countries (Onder & Nyadera, 2020b). Considering the context in comparative study means the practitioners may take the situational approaches to deal with specific challenges issues in the governance and administration. Such kind of study is very crucial and critical for the public administrators and policymakers.

4.1.1 The Era of Change in Public Sector

The traditional model of public administration began to decay in the mid-1980s as a new set of ideas and practices started gaining popularity, which is a market-based approach with flexibility. Although the traditional model dominated the twentieth century, it is somewhat becoming obsolete in responding to the ever-growing demands of the new generations. This change has largely changed the role of governments among the societies through radical and massive reforms in public sector. The emergence of this new paradigm was not a mere challenge to traditional theories and practices, but also a timely and dynamic answer to the global urge of change. The new paradigm of public management had sparked debates in the academia also ushered in a new era of change in the public sector. Developed countries first took this opportunity to reshape their administrations from the traditional models to more market-oriented models where it reduces the role of governments as service providers rather started to make it more of a driver to steer (Onder, 2012). Although the debate between the role of bureaucracy and the priority of the market become intense, it hugely accelerated the changes not only in the developed nations, but also in the developing nations. We have been observing an unprecedented level of changes that have been taking place in public sector in recent years. As it is not a mere a reform or change, it means the change in operation, scope, accountability, and academic study in this sector. It comprises of the nature and function of public enterprises, need-based policy analysis, adaptation of strategic management, development of personnel and performance management system, the implementation of e-governance that lead to the great shift in governance perspective not only in the developed countries, but also among the developing nations (Hughes, 2003). The new changes have largely redefined the role of governments and enhanced the role of private sector in providing services. Public policy-making process has become a natural debate or balance between the interest of bureaucracy and the market. The opposing role of the two powerful entities makes the effectiveness of the state functions weaker, thus, a way of consensus has started to grow. Public-private Partnerships (PPPs) are the most pressing example of a joint venture of these two competing entities in recent years.

According to Osborne (1993: 350), “Government today consists a lot of very dedicated people trapped in bad systems...These systems and others must be changed if government is to improve its performance.” Although

advocating reform is no guarantee, some countries have made significant achievement in implementing changes in public sector. Lack of agreement in what sort of managerial practices and changes ought to be made is still prevalent; it could not resist the actors to go forward with the reform agenda. This scenario also increases the chances of quest for more grounds of commonness in this regard. Comparative methodology can sort out the workable ways of implementation of the agenda of changes under any circumstances and conditions. Jreisat (2011a, 2011b) emphasizes that public administration should continue to adapt changes; however, this tendency does not make its principles irrelevant. The principles of new public management and good governance could replace the relevant issues, which could make it more productive (Ayhan & Onder, 2017). Thus, core values of the management practices of public administration could be reserved and could make new ways for meeting the needs of the new conditions.

4.2 *Crucial Issues of CPA for Future*

To utilize the opportunities for an action agenda that could be promoted, Heady (1998) has identified the following questions can be the guidelines. The issues are:

1. What is the most appropriate and desirable frameworks for the study of national systems of public administration from comparative perspective?
2. What are the ongoing and future probabilities for the advancement in administrative capabilities in each of these systems through scientific knowledge?
3. Which are the foremost style and heritage, challenges and forecasts for the improvement of organizational capacities in least advanced countries?
4. How a capable civil service can be achieved with efficient administrative structure in global sectors, given the dominant setting of nation-state doctrine?
5. What are the future effects for comparative administration amid the transformation that is coming in the days ahead?

According to Riggs (1980), given the changing nature of the world affairs, like the sustainable future of the earth, environmental degradation and climate change, water resources and maritime dispute, and so forth, these variables needs to be considered as the growing concerns for the public administration in the days ahead. Administrative performances of the countries around the world are not simply understood and their complex problems can no longer be solved only by the managerial investigation and improvements. Rather, a more comprehensive approach including all of the fields of study and practice not only of the United States, but also of the whole world should be in utmost consideration for futuristic and sustainable settings. The key concern

here is bureaucratic practices and their interdependencies with the other non-governmental and private entities from center to periphery that is now shaping the world system. It is a more pragmatic approach that the public administration in a following a more open system model rather than a close one could be impressively effective for the nations.

It is a necessary thinking process in administrative development that public administration might not be equally valid for all the nation-states, even if a practice of public administration is found successful in one country, that practice can be ineffective in other countries. Every nation has their own social, political, and economic environments which have different dynamics and realities. A nation-state could embody many historical ups and downs, traumas, and successes, while these facts and events have created individual way of life and social institutions with specific patterns of behavior and national ideals and psychologies. It cannot be assumed that the spirit of public administration is escapable from the above-mentioned realities around the world. These can also not be isolated from social and cultural settings of a nation these circumstances influence its development.

The benefit of comparative public administration is that it comes with more positive outlook to provide a comparative perspective administrative experience among nation-states. This can in turn help us to find out solutions to universal problems. However, the study of comparative public administration is yet to attract the attention it deserves from practitioners and scholars. If this study can be made possible, universal administrative settings with acceptable principles can be developed which might be applicable in peculiar settings of public administration in different countries. The quest for principles independent of any special environment is ignored but is not possible be done so for long because of the urgency of a universally applicable package. The development of a class of administrators in civil service requires a thorough process of examination of the different facts and issues and it is a difficult achieve in practice. For instance, the study of British administrative structure made American students of public administration to propose the establishment of administrative system in the civil service of the United States using the British experience. But this kind of proposals did not sufficiently depend on the historical facts, thus, have failed to garner the pace of change that it achieved in the British without doing it (Dahl, 1947).

5 FUTURE OF COMPARATIVE PUBLIC ADMINISTRATION

Existing literatures speculate the transformation of nation-states' existing system in a way that will impact bureaucracies both at the national and international levels. Comparative administration might face implications from the shift in world system, although the existing nation-states are assumed to continue as the dominant order in the world in the days ahead. According to Heady, "comparativists during the heyday of the comparative administration movement in the 1950s and 1960s commonly assumed that all nations

shared basically the same desires for national development, and that less developed nations would seek to emulate those more developed (assisted by the adoption of imported administration technology).” However, these assumptions did not go unchallenged but faced three futuristic competing visions: “dependency theory,” “social systems delimitation,” and “post industrialism” (Heady, 1998).

5.1 *Lack of Consensus*

The dependency point of view does not question the desirability of usual developmental objectives but is based on a conviction that under development or lack of development in some nations is the results of their dependence on other more developed nations and that any possibility for further improvement is slight without a drastic change in these relationship approaches. This kind of dependencies can often be called as influential while it downplays the role of bureaucrats that they can contribute to the national development. Scholars like Alberto Guerreiro Ramos (1981) do not seem to be fond of historical experience of the developed nations being used as guides for the development process of other countries. The “new science of organizations” suggested by Ramos is based on the assumption that standard organization theory, as derived from the time of Adam Smith to the present, fails to offer a precise area of the intricacy of public schemes study and strategy, because of its unidimensional market-centered focus. The meaning of development and the areas of civic strategy would be changed. The area of the state would become that of fostering a multi-centric society by formulating and enforcing “allocative policies supportive not only of market-oriented pursuits, but of social settings suited for personal actualization, convivial relationships, and community activities of citizens as well” (Ramos, 1981, 135, 136; as cited in Heady, 1998).

National public bureaucracies would require strengthening and reorientation, but little is suggested as to how this should be done. Moreover, there is scant evidence of movement in the direction advocated by Ramos and other proponents of social systems delimitation. They used the example of China during the Maoist period, Yugoslavia before its breakup, and Tanzania under Nyerere as making national efforts along these lines, but in each of these instances recent trends have been in the opposite direction. Post-industrialism and similar formulations using different labels are predictions as to the coming of more advanced countries. Some social scientists have come to an agreed point that “a major transition is in the distance view than in what will be the exact attributes of the emerging society. The dominants are seen as highly educated professional and technical personnel and the would-expansion of the scope of political decision making, and implementation would come into sight” (Koylu & Onder, 2017), but the process of accomplishment has not been given much attention. As time passes, these predictions affecting comparative administration seem to be more subject to skepticism than confirmation,

so that here as in other respects the sub-field shows a lack of consensus (Heady, 1998).

5.2 *Recommendations for the Future*

Scholars of CPA have relentlessly been trying to accumulate a variety in its topics of action and discussion for many days as several other issues have drawn attention apart from bureaucracy. They have emphasized that the topics of public administration all need to be dealt with from comparative perspective. This approach provides more space for the researchers and practitioners to focus beyond the American experiences, thus, it is possible to find out alternatives to bring the solutions to the problems in this field. Fitzpatrick et al. (2011) outline some recommendations for future consideration. He recommends that “public administration researchers should apply the comparative approach in each area of concern, each area in which theorists, researchers, and practitioners are looking for answers” in every context. Another important issue for comparative perspective of public administration is the countries or localities on which the studies are conducted. Not all of the regions and countries get the same attention while being chosen as a case of study. For example, Africa and South America are almost excluded from the concentration. “Comparative research” should get the due importance and should go beyond the traditional style of comparative study by including country cases beyond the United States and the UK, Europe and Asia.

Theory building is a vital issue for the further development of this field of study and any restrictions to any field can reduce the scope for the new solution-oriented theories. Expansion of comparative research with sampling from diverse set of countries is a must to identify the structural differences and variations and how these are interconnected for defining the nations. The “culture” factor is also significantly important when it comes to comparative study. When researchers compare theory implementations and outcomes, it is an utmost priority to consider the cultural contexts for better identification of the situations. If values, norms, traditions, and other cultural elements are ignored, it might lead to mistakes and misinterpretations of findings. Based on the misinterpreted and faulty findings, any conclusions can be invalid. Cultural factors might be found very dominant and influential while a policy or theory is being implemented. If it is disregarded from the consideration, the implications of the implementation would be less innovations and ineffective. Researchers sometimes avoid this important issue not because of their lack of attention, but their lack of familiarity with the theories or methodologies might be the cause here.

There is another issue, which attracts the attention of the scholars in a wider arena. From the very beginning, the struggle for the Comparative Public Administration is its identity crisis. Scholars have been working hard to establish CPA as distinct field of study while making a way out from the traditional field of public administration. Sub-disciplines of other subjects also have some

theories of their own which helps them to characterize themselves as strong field although they are under another main subject.

Therefore, it is “recommend that comparative scholars dispense with defining boundaries and, instead, work to tear down those boundaries and expand beyond a sub-discipline to an area that all public administrators should know. Students, practitioners, and scholars should be encouraged to learn elements of comparative methodology just as they learn epistemology or how to develop surveys or analyze data. The researchers whose articles we reviewed are doing that. They are thinking comparatively because they have considered it wise to examine how a topic of interest to them is working in other settings, often ones with different cultural norms. By breaking these boundaries, comparative public administration scholars can prompt other researchers and practitioners to think and act comparatively” (pp. 827–828).

5.3 *Setting the Future Agenda*

All the concerned demands for development in public administration that is distinctive and encompasses all components should become genuinely comparative as well as global. The emerging issue of “marketization, globalization and privatization” in the world have drastically changed the course of public administration in a large scale both in the developed and developing countries.

Globalization has a large impact on public administration and, consequently, administrative systems around the world are becoming global day by day. Jreisat (2011a, 2011b) emphasizes on the global context in studying the “cross-cultural comparative approach,” which is also influential in practicing public administration. It has been mentioned that “the new global reality requires public administration to utilize comparative perspective that incorporates Western and non-Western systems” for advancing the quest for discovery and generalizations (p. 27). “The dramatic changes in economics, technology, education, and politics have increased interdependence and interconnections among all countries of today’s world. This is the phenomenon of globalization that affected so many aspects of current living” (p. 29). Bureaucrats in the globalized system are being oriented to the new cultures of the international community and being socialized with values and norms from different sources of administrative behavior. Meanwhile, the new and emerging global administrative system also demands an administration that includes “extreme diversity, extensive complexity and significant interdependence in its global bureaucracy.”

The future development of public administration could be very significant. The emergence of its global outlook along with the international administration and bureaucracy in the upcoming days will have noteworthy implications in terms of theory and practice, especially the administrative theory, public administration schooling and training. Scholars and the learners of public administration are calling a new urge amid these developments to think globally rather from a more parochial point of view. “Thinking globally enables

public administration scholars to understand the field better than the past. This emphasizes the need to integrate the new understanding into the theory and practice of public administration. This also calls for the rediscovery of comparative public administration as well as international administration” (Caiden, 1994).

In conclusion, there is a definite dearth of paradigms in public administration that would enable the practitioners of the discipline to become truly “comparative and global.” This stresses the need for new approach in public administration. The newness of this approach depends upon the identification of what is lacking in the existing approach. Further, the relevance and credibility of this new approach depends upon incorporating the changes that have been taking place at national and global levels (Bapuji & Rao, 2001). (p. 538).

6 CONCLUSION

Riggs (1991) emphasizes that “in a global world system, we need to develop frameworks and theories for the study of public administration that are truly universal in scope—they will be based on a comprehensive ecological understanding of the place of public administration in all governments, historical as well as contemporary.” This kind of framework of the study public administration is not destined to only be based on “descriptive information and case studies,” rather it will focus on theories that are explanatory in nature and take input from the experiences and problems faced by the governments around the world in implementing various policies. Empirical basis of knowledge and societal dynamics, where those governments are usually employed, will be the normative guide here. In this context, comparative methods are essential to understand global perspective of administration and to identify multidimensional solutions to various problems. The comparative and development administration have their roots in the ancient history of public administration. These twin fields are the major buzzwords of their mother subject that is public administration. As two major components, comparative and development administration had to go through struggles to develop and establish them both conceptually and practically in the academia. They had experienced this struggle since their inception after World War II. As a post-war phenomenon, it successfully gained attention of the scholars that resulted in a large number of publications that proves their proliferation in interest and studies at that time. Those publications have contributed a lot to the knowledge bank of public administration. Although it rose to prominence, several criticisms had also been directed to that new knowledge from various sources. Based on various grounds like the fragmentation of studies, problems of definition and methodological and scientific rigor, those criticisms were made and created huge pressure on the evolving twin fields of public administration. In the post-1950s, a major shift from “comparative administration” to “development administration” occurred in a large number of impressive studies that published achievements and failures. Those failures were caused by the

contribution of CAG to “anti-development” while making the condition of the masses worse by empowering elites and dictatorial regimes under which they are ruled. “While the elitist comparative and development administration movement of the 1960s and 1970s failed and resulted in the decline of interest in the study of both subfields of public administration, the number of independently produced scholarly works in the twin fields is impressively increasing.” By reviewing scholarly articles that outline the past and present of the twin fields of comparative, it can be found that there would be new trends and challenges under the New World Order for the key field of public administration in general and the develop administration in particular. “In the future, public administration will be both global and comparative and development administration will be an integral part of this global public administration for all countries are developing at different levels” (Farazmand, 1996).

Search for common grounds is vital to bring solutions to the problems in the administrative affairs in different nations around the world. It is an ardent need to conduct more studies of comparative administration so that the point of any universal principles of public administration can be reached that would greatly help the scholars and practitioners to cope up with the challenges ahead (Dahl, 1947). “A critical comparison of these bureaucracies in terms of their history, achievements and failures is offered, to garner important lessons about the relation of societal developments to bureaucracy, its character, and capacities for engineering or inhibiting economic changes. These lessons are valuable in the current context of globalization, in which the constraints of different historical legacies are ignored by governments and international institutions” (Subramaniam, 2009).

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A Framework for Comparative Analysis: Public Administration Across the Globe

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1 INTRODUCTION

Comparative public administration (CPA) is “*the study of administrative institutions, process, and behaviour across the organizational, national, and cultural boundaries*” (Jresiat, 2012: 33). CPA investigates and analyzes by comparing administrative systems and subsystems to enhance our understanding of public administration. It benefits from variety of quantitative and qualitative methods and techniques to manage this comparison and to establish causal relationships among these comparisons. Compared to other social research techniques, experimental research borrowed from the natural sciences is known for the best and strongest tests of causal relationships (Newman, 2014: 282). However, creating and doing experiments in social sciences is very limiting and gets more difficult in a larger social setting. The social, political, and cultural contexts that have significant influence on administrations and institutions might dramatically reduce the reliability and validity of causal inferences. The experimental techniques are usually best for issues that have a narrow scope or scale. In social sciences, making an experiment on a larger scale is very expensive and also rarely possible because of validity challenges. However, comparison is the only

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laboratory open to most social scientists (Peters, 1996: 15). Therefore, when experimentation is not possible, drawing a comparative framework may be an alternative method of experimentation to develop generalizations in research and to discover best or unique practices.

CPA seeks to advance knowledge by looking at thematic areas that touch on the performance, structure, actions, functions, and the performance of institutions so as to enhance the efficiency and reliability of public administration theories, concepts, and procedures (Jresiat, 2012: 34). The comparison identifies similarities and differences and highlights successful implementation, so that improvements and alternative strategies can be expanded for all kinds of systems and situations in the light of quantitative or qualitative evidence. Comparison is so central to make good analysis that the scientific method is unavoidably comparative (Collier, 1991: 7). Therefore, selecting cases and creating quasi-experimental designs can establish causal relations. Like many other disciplines, comparative public administration aims to compare different administration systems and provides valuable data about the administration process, different applications, and challenges. As Klingner (2011: xi) contends that public administration has gradually become an international and comparative field of study and practice. The inclusion of international and comparative perspectives in the discipline has been invaluable in the development of public administration theory, especially in the testing of hypotheses that reflect generalizability or explore unique experiences. In some instances, demonstrating unique features is also contribution in terms of most different design comparisons. In addition, the rapid increase in the amount of international and comparative research encouraged fundamental impacts of comparative logic in teaching public administration across the globe.

Structural functionalism, a theory borrowed from the discipline of sociology has had significant influence on the analysis of political systems. It offers a strong analytical framework not only for political scientists but also for social scientists in general. According to Heady (2001: 8), there is a strong nexus between the function and the structure of the institution. When analyzing a political system, it is important to examine either the functions or the structural attributes of the system. Riggs even though admitted the benefit of these functional categories in studying developed countries' political systems, he criticized the inability in analyzing transitional systems, such as India (Heady, 2001: 10). Functionalism was questioned by neo-institutionalists arguing that structures/institutions should be focused. We have seen many comparativists who tried to create models and frameworks to understand public administration in different social environment. However, one of the key considerations when developing a model to study CPA is that the model ought to be as broad enough to accommodate different societies (Heady, 2001: 17).

Heady (2001: 56) also observes that CPA cannot be successful without putting the study into a conceptual framework. Good comparison provides a framework based on previous research and experiences of the scientific

community. Paradigms and models developed by researchers are used as instruments for these comparisons. They draw a framework and present an ideal type of phenomenon to make healthy comparisons. Paradigms are a combination or set of ideas and techniques that aims to understand the world, identify, and solve problems (Kuhn, 2012). Organizational paradigms are interested in the ideological view of organizations, workers, management, and the hierarchical system in the administration (Guillen, 1994: 7) in a larger social setting and culture. To understand public administration in a different social setting, it's required to have a comparative framework to be able to observe and differentiate similar and different applications. Real-life public administrators work with many constraints, such as economic competition, political competition, state regulation, the collective power of workers, the country's position in the international system of nation-states, and their own culture and mentality. Business-specific mentalities, professional groups, state participation, and employee responses may influence the decisions of administration intellectuals and practitioners about the solutions of public organizational problems (Guillen, 1994: 20–29).

Comparison helps to identify the similarities and differences between functions and structures. CPA aims to compare countries and their administration systems. As W. Wilson (1887: 220) mentions, “of ourselves, so long as we know only ourselves, we know nothing, and we will remain isolated in an interconnected world.” Even if every country has some unique aspects in their systems, similar topics to explain functions or structures should be examined in case studies to make comparison possible. Creating a comparative framework in the case studies would be helpful to formulate and standardize the country studies. There are a good variety of countries in the book to represent public administration systems from different continents across the world. Each country case should discuss why the country has been selected to study its public administration system. What's unique about the country? For example, “Does it have ideological, religious influences or strong cultural impacts in public administration? Is it geographically located in an important location? Such as Turkey being between Europe and Asia, etc.”

There are major issues, topics, terms that have been covered as focus of comparison. Therefore, these concepts need to be explained even further for better comparison. Comparative public administration scholars (Aykaç et al., 2014; Chandler, 2014; Heady, 2001; Kuhlmann & Wollmann, 2014) used and offered a variety of main titles in understanding and comparing public administration systems across the globe. A broadly established framework should consist of certain features and has to meet the test of utility. These features are (Jresiat, 2012: 36): (1) capacity of synthesis current comparative administrative knowledge, (2) balancing between theory and practice, (3) including significant constant and variable factors in providing public services, and (4) considering contextual variations.

Although this book and country case chapters are designed to be comparative study, this work does not claim to be a fully comparative analysis in the

sense that the authors do not make any general theoretical inferences regarding similarities and differences even though we have concluding chapters about country case comparisons. However, this chapter aims to provide the most appropriate structure to show how each particular country or administrative system differs or is similar to others in a given comparative framework. Each author presents a country case chapter with a common format to make it easier to compare one country with another. Some of these very common general topics are: administrative history of a country, central and local governments, public finance management, intergovernmental relations, civil services systems, civil society or nongovernmental organizations, continuous reforms of systems, and reform philosophies.

2 ADMINISTRATIVE HISTORY

The administrative history of a state consists of political and administrative culture, administrative tradition, legal and constitutional framework, and the emergence and development of bureaucracy. It is important to have knowledge about the administrative history of a country because a country's systems are based on an accumulation of historical experiences, knowledge, and culture (Islam, 2019, 2020, 2021; Islam, Bingöl & Nyadera, 2020; Islam & Cansu, 2020; Islam & Hossain, 2020; Islam, Önder, & Nyadera, 2020; Islam et al., 2021; Önder et al., 2017). The country case study needs to identify some important historical issues that have influenced that country's administrative system. For example, "did that country have a strong administrative history?" "How did colonialism (if there is a colonial history) affect the countries' public administration?" Therefore the administrative history title covers some important roots and developments of administrative traditions of that country and identifies some of the main characteristics of its political and administrative culture. It also identifies if concepts such as religion, history, and society shaped that country's administrative system and discusses the emergence and development of current bureaucracy in that country.

2.1 *The Roots and Development of Administrative Tradition*

Administrative institutions in every nation have a specific development process and history that shapes the institutionalization of organizing in the country. To understand the logic of the rules, institutionalization, and customs, the roots of these institutions and administrative culture need to be examined. There are some features that are specific to a country's natural political and administrative development and these features are highly influenced by their setting (Önder & Nyadera, 2020a: 284). Meyer and Rowan (1977) develops the idea of isomorphism "through which formal organizations become matched with their environments by technical social, economic exchange interdependencies." The environment where an organization operates influences the institution's functions (Parsons & Shils, 2007). In other words, organizations

imitate environmental elements surrounding them. All these ecological factors, also shaped by past experiences, influence their institutionalization. Ignoring historical context may limit our understanding and ability to compare nations' current situations. The effect of the past is an important factor in shaping society, lifestyles, cults, and expectations of the people. Therefore, any country case study must pay attention to the administrative culture and tradition of the country from a historical perspective.

The concept of political culture has become a key factor in differentiating any country's political system from others. Political culture covers all manner of social and cultural aspects of the society particularly on matters related to governance (Önder & Nyadera, 2020b). Nationally, there is a close interplay between political culture and political transformation, and numerous formulations have been offered classifying political systems in relation to the political cultures nurturing them (Heady, 2001: 96). Parts of the administrative tradition of a country include: the executive-legislative relationship, whether they use a written or unwritten constitution, whether the constitution is flexible or rigid, and the electoral system used to form the legislature and executive (Lijphart, 1999: 1–5). In addition to this, a colonial or imperial past can directly or indirectly affect the administrative tradition of a country.

The oldest and perhaps the most important aspect of government is bureaucracy, whose evidence of existence can be traced back to ancient civilizations (Farazmand, 2009: 1; Nyadera & Islam, 2020). Bureaucracy was the main focus of comparison (Heady, 2001) in comparative public administrations and comparative politics. However, bureaucracy is a very general term used for anything from minimal “*red tape*” to maximalist approaches to “*public administration*” generally. The term “bureaucracy” is derived from French word “*bureau*,” which means “office or table.” And the suffix “*kratia*” means “power or force.” Bureaucracy can be understood as the domination or power of the table/office (Shaftriz et al., 2016). Weber's classic “ideal type bureaucracy” is based on a rationality. Hence, Weber's (2017) bureaucracy emphasizes professional management, specialization, hierarchy, impersonality, working for pay, system of rules, standard job and task orientation, duties rather than persons, strict control and written records and communication, and recruitment process based on merit. The term bureaucracy can be used to refer to the administrative system or structure of a country (Jreisat, 2011: 62).

2.2 *Legal Structure (Constitutional Framework)*

This title provides a brief account of the central decision-making structures of government as explained in the constitutions. Constitutions are the basic and top level order documents of a country. All countries have a constitution in a detailed written format or as general broad rules. As Lijphart (1999: 4) states, constitutions may be flexible and can be amended by simple majorities in especially unitary democracies. However, in federal democracies the

constitutions can be rigid and can be changed only by extraordinary majorities. “How constitutions distribute power among different branches?” is the main question necessary to understand the boundaries of legislative, executive and judiciary powers. Division of power between central bureaucracy, federal, and local governments is explained (Chandler, 2014: 9) by a country’s top level document—its constitution. Nonetheless, one needs to look further than constitutional dimensions to discuss other regulations and codification systems that influence a country’s administrative systems. A brief history will be beneficial in capturing this impact in terms of the legal structure including the administrative judicial system (how the courts have monitored public administration, the existence of strong administrative judiciary systems or not) and the current legal structure of the country. Illustrating and explaining how the country’s administrative structure is defined by law in a diagram helps better the reader’s understand of the legal framework in a given country.

3 CENTRAL GOVERNMENT

Central government structures are often described in the constitution of a country and shaped by the three arms of government. It also explains the political structure of the country. Heywood (1999) defines the activity of governing as ruling or exercising control over others. The government is composed of institutions that are responsible for making cooperative decisions for citizens (Şahin, 2006). It refers to the highest political rank contained by any such kind of institutions (Hague & Harrop, 2001). Most modern states have more than one level of government: a government of the nation in general, which is usually referred to as the central government, and regional or provincial governments, which are usually called local governments.

This title covers the typologies of both levels of governments that can be used in the framework of comparative public administration. Forms of government may be classified according to the scope of central administration: unitary, federal, or confederate systems (Song, 2000), or can be grouped according to the relations between branches of government, parliamentary, presidential, and semi-presidential systems. Some governments concentrate all of the three powers at one point in the center, while some other governments disperse power among member states or sub-governments.

Unitary System: The unitary system refers to the type of government in which all power is held by the central government and in which sub-national authorities may make policy and execute it by authorization of the center (Hague & Harrop, 2001). The unitary state polity is generally subdivided into centralized unitarianism and decentralized unitarianism. Good examples of centralized unitary governments are the modern People’s Republic of China and France. Japan is a good example of decentralized Unitarianism (Song, 2000).

Federal System: According to Hague and Harrop (2001), Federalism is “the type of government in which the principle of sharing power is shared

among central and state or regional governments.” Given that power is divided between the central and state governments, neither of the two can occupy the authority of the other level (Heywood, 1999). For countries which practice this sort of absolute separation of power, the system is often referred to as federation (Demir & Acar, 2002). Gozler (2003) identifies federalism with the following five features: (1) The territorial or geographical allocation of power, (2) change in power distribution is very difficult (3) The assignment of enduring authority, (4) A two-tier legislative body and representation is equal at the upper chambers of the legislative bodies. (5) The equality of two chambers of the assembly.

Harris (1990) underlines three kinds of federal governments: (1) A presidential government similar to the United States, (2) “executive federalism,” like the Australian and Canadian governments, and (3) “administrative federalism,” like the German and Austrian governments. Authority is given to the federal and local governments either by provisions of a constitution or court clarification. In some countries the federal administration has enormous power, such as in Russia and Nigeria, while in others it has a narrow and distinct role, such as in the United States. The federal government is accountable for external affairs, defense, and macro-economic policy. Local self-government bodies often separately administer local affairs; make, accept, and execute budgets; deal with taxes and dues at the local level; guarantee the safety of public order and deal with any other matter within their mandate. Harris (1990) identifies that there are more than 20 federal states with a total population of slightly over 2 billion translating to about 40% of the global population in the current 193 Member States of the United Nations. There are some variations in task divisions between federal and state governments among different countries that need to be considered.

Confederal System: This type of government functions like a union in a federal manner. It is federal because it emerges from an agreement between the union and member states through a *contract signed by the states*. The union is represented by some kind of assembly, council, or congress and not a particular individual (Song, 2000). Unlike the unitary states, federation and confederation arrange the member states in a composite way. However, when looking at a confederation, it should not be confused with the more traditional unified state but has to be referred to as a union of states. Song (2000) mentions four prototype confederations that have existed: (1) the medieval Swiss Confederation that ended in 1789, as well as the more recent Swiss Confederation that was established in 1815 and lasted till 1848, (2) one also existed in the Netherlands between 1579 and 1795, (3) the 1815 to 1866 German Bund is also an important example, and (4) the American Confederation, that began from 1781 and ended in 1789.

The second central government typology based on the administrative position of executive power where we can have examples such as a presidential system, semi-presidential system of government, and parliamentary system of government. The features of regime types are mainly related to how the main

organs of government are elected and how they work together to figure out strategy and manage the government (Elazar, 1998). Assemblies can be called in different names such as congresses or legislature, or parliament depending on the constitution of the country, but executives have a universal character of parliamentary, presidential, and semi-presidential regimes (Carey, 2005).

Parliamentary System: These are systems of government that are characterized by a clear distinction between who heads the government and who heads the state (Çalışkan & Onder, 2017). In many cases, the government is headed by a Prime Minister who works closely with the cabinet to formulate, plan, and execute government agenda and programs. The prime minister is chosen from the political party or a coalition of parties with the highest number of seats in the legislative body. Appointment of ministers and members of the cabinet is done by the head of government. In this system, the president, who is the head of state and often with powers that are ceremonial, in most cases is elected by a chosen electoral college. He/she is seen as a symbol of unity and apolitical figurehead (Macasaquit, 2006). Carey (2005) underlined that the two main characteristics of the parliamentary system are that the executive is selected by the parliament and holds office according to parliamentary confidence.

Presidential System: In this system, the president is simultaneously both head of state and government (Köylü & Önder, 2017a, 2017b). The president is chosen by the national electorate on a period as specified in the Constitution. Therefore, the president is assumed to have a direct authority from the citizens. As the members of parliament are elected, the members of the cabinet are selected by the President and may require the verification or consent of the parliamentary branch. The only purview of the legislature is the formulation, amendment, and review of legislation (Macasaquit, 2006). Carey (2005) highlights two main characteristics of the presidential system. The first one covers the election of the president directly or indirectly. The second one is about the necessity of making the election by the majority.

Semi-presidential System: Canas (2004) explains the semi-presidential system as it is dominated by a constant principle—the balance between the Head of government, state, and the parliament. Each of the three bodies must be considerably empowered. Unlike the parliamentary and presidential systems, there is a single power-sharing model between the bodies that share the administration of the government system. In the presidential system, parliament legislates and limits the president through political control similar to how the parliament legislates and controls the Cabinet in the parliamentary cabinet system.

Financing the system: Chandler (2014) emphasizes that it is important to examine financing systems of the state in comparative public administration. Therefore, the states can be compared based on their dependence on taxation or revenue from sales services. A good typology may focus on the method of collecting taxes; direct and indirect taxes or based on the authority imposing and collecting taxes; central, regional, or local taxes or based on tax

type whether it is progressive, proportional, or regressive (Alptekin, 2018). As a public organization, central governments cannot be given complete power over their financial resources without independent means of monitoring and checking mechanisms to maintain the use of public resources for public good (Chandler, 2014: 4).

Administrative systems are complex organizations in today's world (Köylü & Önder, 2017a, 2017b). It is important to understand how these complex administrative systems are designed in a given country case. Some significant items that need to be considered to understand the structure and functions of central government are: bureaucratic structures, organizing, and coordinating systems at the central level, ministries, agencies or departments, local organizations of central governments, independent agencies and recent reforms in central governmental issues. Any analysis should include accountability, openness, effectiveness, and democratic participation not only in democratic systems in terms of elections but also their existence and value in administrative systems.

4 LOCAL GOVERNMENTS

Local governments remain an essential part of democracy. The ability to live democracy in the most beautiful way depends on the level of consciousness in the local community and the desire to taste freedom. Many philosophers believed local government is the ideal school for learning democracy. According to Tortop et al. (2007) "public entities with special income, budget and personnel who have the duties and authority set out by the laws, determined by local people, in order to meet the common needs of the local community living in a specific geographical area." For some, all those national institutions are considered central government (Olowu, 1988). However, the second and most widely accepted approach determines local government in a more detailed way. As mentioned in the definition, the following four aspects stand out: legal entity, locality, effective participation, and autonomy (Haque, 2012; Toprak, 2006; Tortop et al., 2007).

For Gomme (1987), local governments remain subordinate to the central government, which is managed and administered by the subordinate authority of the state but independently elected under the control of state authority. The relationship between central and local governments or intergovernmental relationship plays a significant role in understanding the local government philosophy. The World Bank (1989) pointed out preconditions for the effective relationship between the two levels of government (Al Towaitee et al., 2019; Heymans & Totemeyer, 1988):

1. The prerequisite for a strong local government arrangement can exist in an environment that is democratic.
2. Local governments also play a key role in national and local growth.

3. A reasonable allocation of the funds among central, local, and regional actors.
4. Between the local and central government, there has to be an effective audit mechanism.
5. The information sharing among the different levels are reliable.
6. The spreading out of democracy in the whole features of government.
7. General agreement in societal and political features.
8. The basic values of administration are trust and integrity, and capacity to accept innovations.

An approach to local government typology is based on decentralization types since decentralization is a main feature of local government. A number of governments used decentralization programs to endorse democratic procedures. Haque (2012) identified that scholars have divided across diverse typologies of local government decentralization. These typologies are: (1) Deconcentration is a transfer from primary central institutions performing from capital cities to basic offices of those institutions. (2) Delegation here institutions with less authority are given functions to perform by the central government. (3) Devolution whereby local authorities are given some responsibilities from the central government. (4) Privatization is the shift of responsibility of offering services to private-owned not paid firms or personal companies.

Other local government typologies are based on council and mayoral relations (MASC, 2012; Okçu, & Özgür, 2013; Önder & Köylü, 2018): (1) The council form of local government is a kind of governance in which municipalities might have not less than five but not more than nine members, plus the mayor. The mayor has routine duties such as convening meetings, chairing meetings, performing ceremonial duties as well as extraordinary duties such as appointing a temporary legal figure/judge. The mayor has no additional legal power beyond that of other council members. (2) In areas where we have a mayor-council system, there should be no less than 4 members of the council. They select a short-term judge, act as a head administrative officer, and employ staff according to the existing human resources laws. Supervision of departments is done by the mayor. The mayor also votes in the council as other members and guarantees the accurate implementation of laws. (3) The municipality has a mayor with four, six, or eight city congress members but has professional city manager. The mayor conventionally chairs over meetings, arranges the emergency meetings, appoints a short-term judge, and uses their votes as a member of the council. The mayor does not enjoy any executive powers and has no supplementary legal power outside that of other members of the council. Mostly these managers are appointed from a professional manager like CEOs (Önder & Köylü, 2018: 79).

To examine the current local government structure of a country, the following issues and areas should be considered: functional, political (citizen participation, local leadership, central-local relations), and territorial (size,

units) profile of local governments (Kuhlmann & Wollmann, 2014). Local administrative units (general historical development, statistical data) and administrative structure of local government, organs of local authorities, financial structure of local governments, and auditing of local authorities should be briefly explained. Financing local expenses with stronger power is expected to support local government programs and policies. Without the support of central government and institutions, local government may not function effectively unless they have independent powers to raise revenue through taxation or sales of services (Chandler, 2014: 4). Therefore, financial autonomy of local governments should be covered in detail to reflect relations between central and local governments. For example, if the party controlling the central government is different than that of the local government, local governments may receive more or less government allocations or may not even be supported at all. How have the mentality of subsidiarity principle been applied in sharing duties between central and local governments? If there is any unique feature for the local governments in a given country, it should be added. There are continuous reform struggles in local governments. But focusing on reforms in local governmental issues and key changes after the 2000s is important to understand the current situation in local governments. As you conclude, some details on the relationship between central-local governments (intergovernmental relations) should be provided. These issues might be funding relations, decision-making structures based on the proximity of local organs or lack thereof, are local leaders appointed or elected, autonomy status, centralization or decentralization, etc.

5 PUBLIC PERSONAL SYSTEM/CIVIL SERVICE SYSTEMS

Public sector employees or people who work for government agencies are referred to as civil or public servants. Different countries have different sizes, approaches, and models for their public sector employees. A comprehensive overview of the public personnel system deals with the historical progress, scope, and magnitude of civil service, main types and characteristics, the legal and institutional organization, and the cultural base of public personnel systems. Additionally, it studies the recruitment, promotion, and training processes and career patterns of public employees (Kuhlmann & Wollmann, 2014), qualifications, relations with the non-state sector and politicization of civil services. It is important to discuss the extent to which civil servants are close to public policy-making processes and have partisan links with governing political parties (Chandler, 2014: 3). Whether working as a civil servant is prestigious or not provides significant clues on the bureaucratic impact in the country. Comparative public administration also examines the “openness” and “closeness” of public service systems as a qualitative measurement for differentiation (Auer et al., 1996). Focusing on recent reforms in personnel systems will be beneficial in examining the current situation in a country.

Civil service systems play critical roles, in functioning and structuring of public administration. Therefore, civil service/personnel systems have been studied extensively. Some of the topics covered in studying civil services are (Klingner & Nalbandian, 1998: 1): (a) how public sector workers are managed, (b) how performance and roles are determined; (c) the nexus between societal values and political actors in relation to the public service, and (d) administration of public personnel and the applicable systems—the laws, organizations, and processes applied to these abstract values.

There are two types of systems in the public sector (Kuhlmann & Wollmann, 2014). The first one is open personnel systems, also called “position-based systems.” The second one is closed personnel systems, or “career-based systems.” These systems are usually used together; therefore, it is hard to find countries that use only one of these systems.

The main characteristics of position-based systems are: (1) Position-related recruitment, (2) Open access routes to public service, (3) Greater permeability among the public and private sector of employment. The position-based system may look like it is flexible but, indeed, it does not give the employees many career opportunities. In this system, in order to be promoted one should either have an upgraded educational degree or impressive performance. In a position-based approach, the procedures are quite overwhelming. In order one to be a civil servant, there are many procedures to go through. To begin with, a vacancy notice should be published in the media. This notice is not only compulsory for the first appointment but it is also obligatory when the employee wants to move to a higher position. Promotion requires an open position to exist and application for these positions are open to applicants from outside as well (Davitkovski, 2008). Transitional democracies such as Central, Eastern, and South-Eastern European countries use position-based models in their civil service systems (“PACE—Recommendation 1617 (2003)—Civil service reform in Europe”).

The main characteristics of career-based systems are: (1) A career-related recruitment (2) The principle of seniority and lifelong appointment, (3) A separation between the public and private employments sphere (Low permeability between the public and private employment sector). Different from position-based systems, in the career system, public servants with specific abilities are appointed for specific jobs. These employees devote their entire lives in these positions to serve their society. The United Kingdom and France are the best examples of career systems and many young developing democracies use these model countries for shaping their public administration systems. Career system has become more popular in recent years among European countries. Portugal and Germany adopted this system because they believe that this system is more impartial, neutral, and egalitarian, which are the main characteristics of democracy (CoE, Committee on Economic Affairs and Development, “Civil Service Reform in Europe”).

Research on unionization in public personnel systems show that although unionization has positive impact on compensation, its effects are somewhat

smaller than the effects in the private sector (Lewin, 1973). Nevertheless, compensation is not the only impact of unionization. In addition to their positive effects on compensation, unions also positively affect employment (Zax, 1985). In relation to unionization, Freeman (1984: 52) says that public sector unions have the political power to raise demand for public services and they also possess bargaining power to fight for higher wages. Bargaining power gives employees strength to ask for higher wages. For example, regulations in labor law in many countries such as Turkey creates strong unionization in the public sector unlike in other sectors (Önder & Zengin, 2018).

6 CIVIL SOCIETY/NONGOVERNMENTAL ORGANIZATIONS (NGOS)

Although it exists in every society, the concept of “civil society” does not have a common definition in the literature. When we look at the studies on civil society, “non-profit sectors,” “non-state organizations,” “independent sectors,” “voluntary sectors,” or “third sectors,” these concepts have been used in different regions or fields with a similar meaning (Önder, 2006: 8; Salamon et al., 1999: 3). Public and social services can also be provided by non-state organizations. Each society has their own unique scope that defines the operations of voluntary organization and how they are supposed to meet collective needs. Therefore, there are many different non-profit services such as, community health centers, social service cooperatives, water needs, and credit unions, which voluntary organizations offer in cases where there is either lack of government will or capacity (Ayhan, 2020; Onder, 2011). In many societies, NGOs operate on a non-profit basis independently of the state. These organizations are increasingly working with and for government agencies if need arises. Such collaboration is seen as useful for the general population. What stands out for voluntary organization is that they are not accountable to the political and elite class of the society but to their members (Esman, 2001: 757).

The capacity of the non-profit sector gives a lot of data about the societal and governmental attitudes of a state. There is generally no single definition for capacity when looking at voluntary organizations. Capacity in this case can be looked at from a broad or narrow perspective, in terms of whether the organization is dynamic or instrumental depending on the environment it is operating in. Therefore, it is very difficult to come up with a scale for determining the capacity of an NGO. A better way of looking at it is to examine the capacity of a specific organization using internal measurements. Lack of a standard measure of capacity has posed challenges for researchers attempting to look at the capacity of NGOs at the macro and international levels. However, there are some approaches that have been adopted such number of non-profits per capita, or amount of non-profit revenue per capita (Önder, 2006: 9). Financially vulnerable NGOs are not expected to provide services (Önder &

Ayhan, 2020). Therefore financial picture and well-being of NGOs is important to understand their impact in society. The number of NGOs, number of employees in NGOs (volunteer or fee-earning), voluntary working time per individuals, and an annual support of households (Önder, 2010: 508) are the other parameters measuring the strengths and dimensions of NGOs in a country.

After providing a brief historical development of NGOs/Civil Society about a country, illustrating and discussing the presence/size/capacity of the NGOs will be beneficial to understanding the civil sector. Globalization of NGOs and the dominant governance paradigm that heavily promotes the inclusion of NGOs in public service made civil society an important topic in comparative public administration. Also partnership theories see NGOs as part of public administration in policy-making and implementation. NGOs recently provide a huge amount of public services with contract bases (Önder, 2006, 2011).

7 RECENT DEVELOPMENTS AFFECTING PUBLIC ADMINISTRATION

A rapidly changing and challenging environment has gained momentum to the role of the state, especially to the public and local governmental regulations at national and international levels. Political, economic, technological change, and globalization in many countries affects the organizational culture and professional values of the national and sub-national public services (UNDP, 2010). As governance reforms are dominant in five continents, the empowerment of the public administration has been restored with the need to increase performance, service delivery, transparency, and accountability to a large extent. A new generation of local leaders are acting as catalysts for local development and increasing local government revenues that are managed by sub-national governments in consultation with local residents. Local governments are better at reflecting the priorities of citizens, providing services more efficiently and enabling citizens hold them more accountable. However, linking political developments with internal transformational changes in public service remains a major challenge, as public officials in many developing countries have not yet been sufficiently sensitized and socialized to operate in more open and transparent societies characterized by an increasing number of up and downward accountability obligations.

Technological developments have a considerable effect on public administration structures. Now more people have access to cheaper and faster technology and information. States are now using technology in most parts of their administrations from local elections to e-government systems. Technology affects the ways the political leaders address their supporters and it changes many aspects of public administration. Using technology as a facilitator in campaigns has become very popular and effective in social changes. Now people come together in virtual environments to raise awareness on many subjects and even political figures make their voices heard through technology.

Since it is easier to see the public reaction and protests, law and policy changes have become faster and more accurate.

Along with technology and social media, more people are becoming aware of global issues. A growing number of people are discussing global issues such as sustainability, gender equality, and international trade. Consequently, local policies become similar to global policies and a global mindset in public administration appears. The revolution of information and communication technologies has had an impact on the quality and speed of service delivery to the citizens as well as improve in a greater way access to information for both the citizens and public administrators (Batalli, 2011). Information technology is a recent development in public administration that seems to be changing the quality and effectiveness of government services to the people. Through the adoption of new technology in public administration, new processes and organization strategies can also be implemented (Önder, 2012).

The invention of Artificial Intelligence (AI) has added to the value of adopting technology in administration since the early 2000s. The impact of AI in public administration will enable the formation of an ecosystem worth USD 15 billion by 2030 (Önder, 2020). AI allows for huge data mining, processing, and transfer which is key for successful public administration processes. Therefore, AI will create and further the growth and efficiency of public sectors across the world. In addition, countries are supposed to ensure that development of AI will have a positive impact on their societies as a whole (Önder & Saygili, 2018). Given the importance of AI, countries are today rushing to develop key strategy documents on AI (Saygili, 2020). It is important to add that the private sector will continue to play a key role in promoting AI in the public sector. Therefore, the country cases specifically should consider and evaluate the national policies regarding AI.

Democratization processes in traditionally non-democratic countries also change the foreign policies of countries. The democracy demand of average people has affected the destiny of countries and even led to revolutions in states like Libya and Egypt. In addition, culturally and ethnically divided nations witnessed some conflicts in the process of democratization.

7.1 *Recent Reform Philosophy*

Public administration has witnessed quite different periods and changes. It has been faced with paradigm changes that are subject to constant scrutiny. The development process of the discipline started with a general view of all legal, technical, social, human, and political aspects of administrative organizations, such as national state administration, local governments, state economic enterprises. Many effective theories and models are encountered in the development process of the public administration discipline. New Public Management, which is the latest international version of the discipline, attempts to reassess existing assumptions and discover and implement best practices (Jreisat, 2011: 21). New public management (NPM) is one of the key reforms in PA that

describes how private sector management techniques, approaches, and theories can be utilized in the public sector.

NPM is the theory of the latest paradigm shift influenced by private sector approaches on how to manage the public sector. It first started in the United Kingdom, then spread to the United States, and later to the Scandinavian as well as Continental Europe. The NPM theory includes insights from public choice, game theory, economics, and the disciplines of law and economics (Lane, 2000: 3; Önder, 2012). NPM is not a replacement of traditional frameworks but offers improved mechanisms for public sector governance. While the administrative reforms before 1980 adopted the technique of improving the administrative ability of the administration within the framework of traditional public administration, after 1980, classical techniques were replaced by restructuring of management structures and processes. In NPM, the implementation of the following basic methods is especially based on performance evaluation, increasing the importance given to the principles of effectiveness, efficiency and economy, increasing competition, focusing on output-oriented goals, benefiting from the cost reductions experienced after the developments in information technologies, and the competitive advantages of governance mechanisms (Özer, 2015: 156). The techniques and approaches seen in the private sector in the background of NPM are analytical method, political method, liberal method, and market-oriented method. It is also known that public choice and transaction cost theories are the theories utilized in this paradigm change (Önder, 2012).

Today, it is seen that there is a versatile transformation and change in almost every field in the world. Four different discourses have developed on what this transformation is. The first is the scenario of the moving from industrial to information-based society, second one is the movement from Fordist to flexible production methods, third is movement to a globalized world from nation-states system, and lastly is the movement from modernist to post-modernist thought. These four scenarios are interrelated, one complementing the other. This versatile transformation leads to the emergence of new searches in management (Tekeli, 1996: 48). Governance is rapidly developing because of critique of the NPM paradigm. In addition, governance is seen as an interactive process involving different partnership structures. It brings public administration from management to political science back again by emphasizing citizens rather than customers, participation mechanisms, civil society organizations, transparency, and social accountability (Ayhan & Önder, 2017). The recent reform philosophy view in public administration has been shaped by the emergence of concepts such as NPM and governance. New millennia reforms were mostly done with governance philosophies and digital administrations.

Convergence and divergence of administrative systems: The convergence hypothesis assumes that forces, such as internalization and globalization, will be the main external determinants in the reforms. National structures, which until this point have varied widely along with their historical defining

factors, will lose more and more impact in the face of this determinism and will yield to an institutional, cognitive, and normative alignment. The convergence hypothesis is also sustained by rational choice theory and its derivatives in New Political Economics and the economic theory of bureaucracy (Kuhlmann & Wollmann, 2014). On the other hand, the divergence hypothesis argues that—irrespective of the influence of globalization forces—institutional, cultural, and normative factors have a continuing determinative effect.

The last quarter of the twentieth-century reforms mostly featured NPM reforms, while in the new millennia we have experienced governance reforms. This book focuses on governance reforms. However, some countries are still struggling with NPM reforms that need to be addressed also. According to Pollitt (2001), a differentiated examination of convergence and divergence hypotheses requires a closer look at the different phases of reform processes in the individual countries.

The Impact of International Organizations: International organizations such as the European Union, International Monetary Fund and World Bank, and UN, have many effects on the administrative structures of developing countries. EU integration processes deeply impact the public administration structures of the candidate countries. Many scholars on the other hand, criticize the impacts of international organizations based on the argument that these organizations use their power to build certain kind of administration models in developing countries. These scholars argue that the involvement of international organizations in policy-making processes in developed countries damage the sovereignty of these nations (Jresiat, 2012). Another argument is that international organizations hinder developing countries from finding government structures fitting to their local contexts (Farazmand, 2001). Countries in the global south are being coerced to implement neoliberal approaches. On the other hand, some of them argue that a modern NPM or governance strategy are being imposed on the developing countries with the help of international organizations. Such claims are often not followed up with empirical evidence indicating the nature or extent of such influence (Andrews, 2013). The impacts of external forces in reform need to be known in theory and practice to capture diffusion of reforms.

8 CONCLUSION

Conclusion should have good and short summary of the country's administrative systems so that all country cases can be compared with this summary based on titles/outlines provided in comparative framework.

Administrative history should include geopolitical significance, historical development, and its reflection on administration culture, whether the country has a colonial history or not, legacy of strong and centralized bureaucracy in terms of long historical and empire past, civil-military relations or the role

of the military in public administration, administrative and political culture, politicization of bureaucracy, existence dominant state ideology or not, professionalism and perception of professionalism in public administration.

Constitutional and legal framework should cover the origin of the constitution, strength of the constitution, whether it was created by civil initiatives or military bureaucracy or revised by civil initiative or military bureaucracy, and the administrative judiciary system.

Central government title should explain unitary/federal/confederal status and parliamentary/presidential systems of governments, whether it has a strong or weak central hierarchy, centralization and decentralization philosophy, main tasks of central governments, local extension agencies of central governments, and appointment or election of their top executives, coordinating mechanisms in the center, financing system, monitoring and auditing mechanisms, and independent regulatory institutions.

Local governments title should contain financial and/or political autonomy, decentralization types in terms of deconcentration, delegation, devolution, or privatization, appointment of mayors, council types, decision-making bodies, central tutelage/monitoring, subsidiarity principle, intergovernmental relations and communication, division of tasks, and administrative tutelage/monitoring.

Civil service systems sections should cover the scope of civil services, recruitment and promotion process, the existence of a nationwide competitive exam or not, whether being a civil servant is prestigious or not, politicization, career, or position-based system, and unionization of civil servants.

Reform philosophy of countries should be explained even if recent reforms were provided in a related titles. Whether dominant recent reforms in last 5 years are NPM or governance (accountability, openness, participation) focused or oriented, and influence of external actors in these reforms. New technology-oriented such as artificial intelligence, e-government, and digital administration reforms should be briefly explained.

Civil Society/NGOs title should illustrate scope/size of civil sector in terms of NGO membership, volunteering rates, employment, contribution GDP, institutionalization of NGOs, their partnerships with state, major financial revenues of NGOs, existence of supportive national culture for civil society, political regime and civil culture relations, and whether working full time, part-time, or as a volunteer, is prestigious or not.

Table 1 Comparison framework for public administration systems across the countries

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Administrative History	Geopolitical situation	Strategic/not strategic
	Colonial history	Yes (period)/no
	Legacy of bureaucracy	Yes (Empire/military/technocracy)
	Centralized bureaucracy	Strong/moderate/weak
	Role of military	Military dominant/military influence/weak military influence/no military influence
	Political culture	Very Liberal/liberal/conservative/very conservative
	Administrative culture	Very participative/participative/not participative
	Professionalism	High/moderate/low
	Politicization of bureaucracy	High/moderate/low
	Dominant state ideology	Secular/religious/Socialist/no ideology
Legal structure	Nature of constitution	Written/unwritten/hybrid
	Origin of constitution	Year & significant event or contract
	Strong constitution	Yes/no
	Constitutional rigidity	Yes/no
	Created by	civil initiatives/military/
	Revised by bureaucracy	civil initiative/military/
	Administrative judiciary system	Strong/moderate/weak
Central government	State structure	Unitary/federal/confederal
	Government structure	Parliamentary/presidential
	Hierarchical structure	Strong/weak
	Local extension agencies	Limited to main areas/too many
	Central government	Yes & strong/yes & weak/NA

(continued)

Table 1 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Local governments	Coordinating mechanisms	Existence of coordinating internal and external structure/agencies Weak/moderate/strong
	Transparent financing system	Weak/moderate/strong
	Monitoring	Weak/moderate/strong
	Independent regulatory agencies	Exist/not exist
	Financial autonomy	Non/weak/moderate/strong
	Political autonomy	Non/weak/moderate/strong
	Council types	Council mayor/council manager
	Mayors	Elected/appointed/in extraordinary cases appointed
	Decision making bodies	Exist/does not exist Name the decision making bodies in local governments
	Central tutelage/monitoring	Exist & strong/exist & weak/does not exist
Intergovernmental relations	Subsidiarity principle	Exist/does not exist
	Decentralization type	Deconcentration/delegation/devolution/privatization
	Logic for division of tasks	Fair and rational/undefined/political
	Tutelage/monitoring	Non/weak/moderate/strong
Public personnel system	Communication	Weak/moderate/strong Formal/informal
	Civil services	Career based/position based/mixed but X? dominated Prestigious or not
	Scope of civil services	%of civil services
	Recruitment and promotion	Competitive/not competitive not political/political fair/not fair
	Nationwide exam	Exist/does not exist
	Politicization in general	Weak/moderate/strong
	Unionization	Weak/moderate/strong
CSOs/Civil society	Size of civil society	NGO membership, volunteering rates, % of GDP, employment

(continued)

Table 1 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Reform philosophy	Institutionalization	Non/Weak/moderate/strong
	Partnership with the state	Non/Weak/moderate/strong
	Political pressure/domination	Weak/moderate/strong
	Major financial revenues	Membership fees, operating incomes, government supports, donations, and fundraising activities, rents
	Supportive national culture	Non/Weak/moderate/strong
	Political regime & civil society relations	Non/weak/moderate/strong
	Civil society	Prestigious or not?
	Dominant reform paradigm	NPM reforms/governance reforms
	Policy transfer	Policy adaptation/policy adoption
	E-government reforms	Completed/not completed
	Artificial intelligence (AI) reforms	Exist/partial exist/does not exist
	Influence of international actors	...
	New reforms (5 years)	...

Authors' compilation

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Public Administration Features in Developed and Developing Countries

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1 INTRODUCTION

Comparing public administration of developed and developing countries is increasingly becoming an important academic and policy endeavor, partly because of the demographic division between these two regions that sees 75% of the world's population residing in developing countries while developed countries account for 25%. In addition, globalization has led to higher interaction of people in these two divides. With the world population estimated to reach 8 billion by 2025, there is a need to further interrogate the similarities and differences in public administration and how this will impact on people living in different parts of the world.

Placing all the developed countries into a single statute title has proved futile. However, scholars have been able to categorize developed countries based on their contemporary status of governance and their political, historical, and administrative legacy. Developed countries are sovereign states that have an advanced and diverse economic base, higher per capita income levels, more

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creative industry, and more advanced technological infrastructure compared to less developed countries.

Most developed countries have advanced technology, better health, and education systems; their citizens have higher levels of income, actively participate in governance, and have equal protection under the law (Peters et al., 2000: 21). Developed countries, for instance, attract more investment to promote development and well-being of the society. Moreover, developed countries have generally post-industrial economies. For instance, the service sector provides more wealth than in the industrial sectors. According to the International Monetary Fund in 2015, the 10 largest advanced economies comprise 60.8% of global GDP. In this respect, the economic environment in developed countries is more stable compared to developing countries, which are more flexible economic environments and lead to more fluctuation and an unbalanced degree of economic activities.

Heady (1998) makes a distinction between classical administration system dominant in countries like Germany and France on the one hand and the civic administrative practices in a majority of the Western countries. Additionally, Japan was presented as an adaptive modernizing administration, while other countries such as the China and the Russian Federation were portrayed as “Second Tier” in the development process. Despite the efforts, categorizing developed nations remains complex due to variations in economic, socio-cultural, and political development levels. This segment concentrates on the main attributes of developed nations, specifically the development administration context. Notably, in the majority of developed nations, development and non-development administration differentiation becomes arduous based on habitual administrative machinery mandated in promoting and regulating traditional and also developmental roles of governance.

Developing nations are states that are often characterized by low living standards, undeveloped industrial bases, low competency rates, and lack of equal protection under the law, and their citizens generally face low levels of income, lack of quality healthcare systems, and a low score on the human development index (HDI). This is comparable to countries that have made significant progress on modern infrastructure, both physical and institutional (O’Sullivan & Sheffrin, 2003). Nevertheless, even though developing nations are less industrialized and have lower per capita income, since the late 1990s they tend to demonstrate higher trends in economic growth, increased manufacturing and industrial facilities, financial markets, and increased access to higher education and health systems. In other words, even developing countries are not stagnant as they continue to implement efforts that can improve the quantity and quality public service to societies albeit with constraints (Korotayev & Zinkina, 2015).

In developing countries, the great diversity in structure, environmental context, behavioral patterns, and administrative system output makes it difficult to address the stature of development administration (Saxena, 1996). There’s existing variation in the political, social, cultural, and technological

level of development in developing countries which covers a large portion of the globe geographically. The majority of the nations that fall under this category are in Africa, Asia, and Latin America (Diamond et al., 1995). However, there are a few exceptions such as Japan and South Korea joining the developed countries league (Kuznets, 1988). Remarkably, China is working toward Super-Power status, while Asian Tigers steer clear of Nepal, Bangladesh, or Sri Lanka counterparts (Xuetong, 2001). Hence, such dissimilarities on socio-economic development levels result in a broader class of developing nations.

Comparing public administration between developing and developed countries has since been an essential aspect of comparative public administration (CPA). This is because states, which are the basis of comparing public administration, have undergone immense changes over the years. Public administration as phenomenon is closely associated with human civilization as it defines how societies are governed and organized, thus making it an important tool to understand societies. Notably, different countries have distinct historical experience on the origin, evolution, and development of public administration institutions (Islam, 2019, 2020, 2021; Islam, Bingöl & Nyadera, 2020; Islam, Önder, & Nyadera, 2020; Islam et al., 2021; Islam & Cansu, 2020; Islam & Hossain, 2020). Similarly, the nature and factors that influence or affect the public administration structure also differ from one country to another (Nyadera & Islam, 2020). This also speaks to the different systems, cultures, structures, and roles of administrators in different countries (Onder & Nyadera, 2020b). What merits comparing public administration between developed and developing countries has been strengthened by not only intense globalization but also the desire to learn and explore different administrative strategies, tools, and processes that distinguish different administrative units. This has seen comparison done between states, regions, and in the case of this chapter between developed and developing countries.

Haynes (2008) argues that the recent drive for CPA among policymakers and scholars became more intentional end of the Second World War period which was characterized by widespread economic crises and rapid decolonization. Policymakers found themselves facing serious constraints in delivering public goods, and there was a need for serious and urgent action. One of the ways to respond to the challenges at the time was to study and borrow administrative practices from other countries and regions. What was consistent though is that majority of developing countries were looking up to the developed countries for modes and strategies of public administration.

Initially, developing countries featured high government involvement in the provision of public goods. The private sector's importance at the time was overshadowed by concerns that they would only worsen the income inequality gap and widen the margin between different countries. However, in looking at the public administration system in the developed countries, there was a visible presence of private and nonprofit sector actors responsible for supplementing government efforts in providing public services (Onder, 2006).

This approach justifies comparison of public administration under two broad classifications of countries (developed and developing). In addition, administrative culture has strong resemblance to the society's structure. Given the shared similarities and differences between countries, it is easy to find similar practices that are unique to developing countries and missing among developed countries and vice versa (Navarro & Rodriguez, 2007). This chapter will therefore allow the reader to develop some preliminary view of a country's public administration based on whether it is developed or developing. While this does not indicate homogeneity, it is an acknowledgment that the distinction between developed and developing countries is very clear when it comes to issues such as the human development index, which may translate to the quality of public servants, governance culture which dictates if a country practices top-down, or bottom-up decision-making processes.

It also reflects a country's level of technology which is increasingly becoming a central feature of public administration, recruitment processes (merit or politically influenced), corruption, and the relationship between bureaucracy and politics. This chapter will begin with a historical discussion of the evolution and significance of public administration by examining different civilizations. In the second part, it will then assess the difference between developed and developing countries. The third part is a discussion of general features of public administration in developed countries, followed by a similar discussion for developing countries. The fifth part is a comparison framework and discussion before concluding.

2 HISTORICAL EVOLUTION AND SIGNIFICANCE OF PA

There is a strong historical nexus between PA and development given the role administrators play in implementing public projects (Meier, 2015: 15–18). This has made the public administration an integral part of humanity and social transformation. Indeed, the concepts of governance and public administration have been discussed over the years, and both the components of comparative management and administrative management formed the early foundations of modern public administration (Farazmand, 2001). Advanced public administration systems in ancient Rome and Greece allowed these empires to efficiently extend their control to large, conquered lands and huge number of people (Pesch, 2008). The Ottoman and Persian empires as well as imperial China in the in the Middle East and Far East, respectively, had adopted unique but sophisticated systems of public administration centuries ago (Altowaitee et al., 2020). Some of these ancient practices continue to characterize administrations of countries in the modern age. Most of these ancient administrative units also faced problems similar in nature and character to the challenges of our time. For example, many governments today, just like in the past, are struggling to fulfill all public needs (King, 2007).

3 DEVELOPED AND DEVELOPING COUNTRIES, AN OVERVIEW

The most elaborate classification of developing and developed countries is the one by the United Nations (UN). The UN tends to categorize countries in two broad levels using economic matrices such as level of industrialization, individuals' average wealth (per capita income), gross domestic product (GDP), birth rates, literacy rates, and reliance on foreign trade. Below are a list of areas which distinguish developed countries from developing countries. The United Nations Development Program (UNDP) has its own level of classifying states on whether they are developed or not. It focuses on using the human development index (HDI) metrics, which take into account the multi-faceted dimensions of development. HDI measures countries' performance by analyzing their achievement on three variables (education, longevity, and income). It uses the Gross National Income per capita (GNI/n) and quartile of the HDI distribution to classify countries. Countries that fall under HDI percentiles of 76–100 are developed, 51–75 are considered developing countries, HDI percentiles 26–50 are considered medium, and 1–26 percentiles are considered low group countries.

The World Bank uses estimates of countries' Gross National Income (GNI) per capita or sometimes uses gross national product or (GNP) to classify countries. It creates four classifications of countries: namely, countries that have low income with \$1,040 or less GNI (least developed), countries that have lower middle income with \$1,040 to \$4,080 GNI (developing countries); upper middle-income countries with \$4,048 to \$12, 656 GNI, and those with high income: \$12,485 or higher GNI are considered developed and most developed countries, respectively. The IMF adopts a different classification of countries. It uses (i) level of income per capita, (ii) diversity of exports, and (iii) the level to which the country is integrated into the global financial system. IMF also classifies countries broadly into emerging, advanced, and developing economies categories.

	<i>UNDP</i>	<i>World Bank</i>	<i>IMF</i>
Developed country classification	Developed countries	High-income countries	Advanced countries
Developing country classification	Developing countries	Low- and middle-income countries	Developing and emerging countries
Threshold development	Above 75 percentile of HDI distribution	US\$6,000 GNI per capita	Not explicit

(continued)

(continued)

	<i>UNDP</i>	<i>World Bank</i>	<i>IMF</i>
Developing countries sub-categories	(1) Low human development countries (2) Human development medium countries, (3) Human development high countries	(1) Middle-income countries (2) Low-income countries	(1) Emerging and other developing countries (2) Low-income developing countries

Some of the developing countries with colonial history have a unique administration system. The administrative systems of some developing countries remain the same as those established by the colonial powers (Turner & Hulme, 1997). The decision to retain some of the colonial administrative structures could be related to the effectiveness of those systems, especially for a government that intends to have a firm control over the country (Masum, 2018). It should be remembered that the colonial administration had few personnel yet was able to control a vast geography of the planet. Therefore, the continued existence in some countries of district commissioners and other colonial era administrative positions enable the current rulers to have a hands-on leadership style although in some other countries, constitutional reforms have led to the abolition of some colonial style administrative approaches, though not all.

The fall of colonialism caused the greatest structural changes of government in history (Mengara, 2019). The newly independent states began to coin their own administrative systems. These changes would come to affect the day-to-day lives of their citizens. It is important to note that the struggle for independence was associated with hope for better services and improved government response to the needs of the local people. Given the level of underdevelopment and inequality, the role of the government was very important during the early years of independence. Even amid these changes, suspicion and lack of trust toward developed countries, lack of reforms to accommodate newly independent countries in the rather competitive liberal international system, as well as indirect attempts to influence events in post-independent states by previous colonial powers complicated things for the new countries.

4 CHALLENGES OF CLASSIFYING STATES AS DEVELOPED AND DEVELOPING

Differing Levels of Human Development: According to the United Nations Development Program report on human development on July 24, 2002, there is a striking variation in issues of human development among the developing nations. India, Nigeria Pakistan, Kenya, and Bangladesh reported a low HDI, while other Third World nations like Sri Lanka had a higher index.

The low human development index is a result of dissatisfactory development administration. This is because the inexistence of a governance system is not accountable for creating human development. While the HDI gives interesting dimensions of distinguishing developed from developing countries, scholars such as Wolff et al. (2009) have questioned whether the metrics used could be inadequate in giving the true picture in developing countries.

Diversity in Political Regimes: Over two decades ago, Milton Esman (1999) denoted five political regimes in developing nations with an assumption of common behavioral and structural features among them that are believed to apply the role of nation-building and socio-economic transformation in the same way. These regimes include (Kailitz, 2013):

1. communist totalitarian states,
2. competitive interest-oriented party system,
3. conservative oligarchies,
4. conservative oligarchies,
5. dominant pass party systems.

Mirele Fainsod characterized five distinct political systems in developing nations basing on “bureaucracies relationship to the political authority flow.” It includes:

1. representative bureaucracies,
2. party state bureaucracies,
3. ruling bureaucracies,
4. ruler-dominated bureaucracies,
5. military-dominated bureaucracies.

Furthermore, Ferrel Heady (1998) redefined his previous categories resulting in the emergence of six new classifications:

1. traditional autocratic structure,
2. bureaucratic elite structure,
3. polyarchal competitive model,
4. dominant party semi-competitive model,
5. dominant party mobilization model,
6. communist totalitarian model.

According to Heady, this classification can be applicable despite the shift in political structure in some developing countries. Developing countries focus on the nature of power and how it is shared among different sections of a political system more specifically its bureaucratic system. Subsequently, the efficacy and character of development administration functioning are influenced by the principle of the political system in a country.

Varying Levels of Development: In many developing countries, heterogeneity is the major feature of economic development levels in countries from the Global South. A report from the World Bank shows huge variation among these nations in levels of industrial development, per capita income, national income, agricultural growth, etc. Notably, the nature of development administration is influenced by both the economic development level and evenness and economic resource distribution in developing countries. Nations that sought to stay updated with globalization and liberalization affairs of their economies with support from international assistance and investment impel expeditious economic development compared to others, who took the clumsy initiative. It is this variation in the level of economic development that has necessitated new classification of countries to categories such as middle class, upper middle class, and lower middle class. Sometimes phrases such as developed, developing, and underdeveloped countries are also used (Kim et al., 2012).

Bureaucratic Polity: The majority of Western scholars perceive that the central levels of power are being controlled by bureaucracy in developing countries in political regimes that are dominated not only by a one-party system but also a multi-party system. Because of its competence, educational background, expertise, and experience, bureaucracy has an upper hand over other subsystems, which relish the power that would have been earned in the legal-rational authority system. According to Riggs (1970), when development administration has the hallmarks of bureaucratic expertise, it's referred to as a "bureaucratic polity." He further affirms that the application of bureaucratic polity in developing countries is against "party-run polity."

As a perpetuation of presumption concerning bureaucratic power and socio-economic development relationship, Riggs (1970) together with other ideology-oriented scholars believes that creating "balance" in polity will hasten the development process in developing countries, hence lessening the bureaucratic power. This notion is a direct concept of the Western legacy of "balance of powers" and "checks and balances." However, scholars such as R. Braibanti (1962) dispute this approach indicating that bureaucracy might be the motive force of the development process and should avoid adopting the prejudiced concept of its viewpoint on power and development. Most objectively and rationally, an extensive ecological approach needs to be adopted and deduces the duties and effectiveness of bureaucracy.

4.1 *Political Culture and PA*

The relationship between public administration and political culture has been overlooked in existing literature, but both influence each other immensely. In discussing a country's political culture, there are many areas and variables that can be brought forth (Box, 1999). Key among them is the extent of democratization in a country which I will use to reflect on the administrative system of developed and developing countries (Box, 2015). Countries' political culture is mostly classified as either democratic or un-democratic. This distinction also

communicates an important distinction in how a country's public administration system is structured and operates (Nabatchi, 2010). Recently, much effort has been devoted in examining democratization, especially free and fair elections, stable institutions, effective political parties, independent judiciary, and politics that are based on public participation (Dahl, 2020; Schmitter & Karl, 1991). The mentioned variables have distinct application and presence in developed and developing countries and provide important understanding in the differences between developed and developing countries.

Democracy is not primary an instrumental arrangement, but rather is a culture (Burmeister, 2012). It is a norm with a set of rules accepted by different political stakeholders and citizens alike. There are many ways in democratic values, principles, and societies that can be organized and managed (Lijphart, 1999). Along with its influence on public administration, political culture also influences other key components of the society such as cooperation, public opinion, moderation, bargaining, trust, policy pragmatism, and openness to ideas of others including the minorities (Diamond, 1994). Therefore, depending on the type of political culture, a country's administrative system and governance institutions such as the parliament, judiciary, and also the interest groups as well as political parties will be influenced.

A unique characteristic that sets out most developing countries is that a majority if not all of them have a relatively established political culture and stable institutions that tend to work effectively and efficiently, especially during the formulation and implementation of public policies (Kolstad & Wiig, 2009). The implementation of public policy is left to assigned institutions that are legally entitled to make decisions and that have the ability to act on them with limited political interference. Part of this success is associated with the benefits of adopting refined technologies in the identifying and delivery of services (Danziger & Andersen, 2002).

Moreover, developed countries are able to consistently adopt emerging trends that influence how effective the government can be and reduce wastage (Kolstad & Wiig, 2009). However, developing countries face several economic and social problems that restrain them from not only realizing economic development but also undermining efforts aimed at attaining democratic culture. Since developing countries are struggling to solve economic problems, eliminate poverty, and solve conflicts, among other challenges, little attention and resources are channeled toward strengthening institutional setting and democratic participation channels (Baquero, 2013; Bianchi et al., 2017).

Given their stable democratic political culture, developed countries are able to experience a governance system that is highly differential and functional in terms of budget allocation, job description, and roles (Box et al., 2001). Meaning and bureaucracy in developed countries have a high degree of specialization and enjoy relatively high human resource competence and merits, which lead to effective policy control. These roles reflect the general characteristics of the society. Procedures for making political decisions are based on broad participation, rational, and secular. Developing countries on the other

hand have weak democratic cultures characterized by low public participation, political interference in the decision-making process, and lack of rational, evidence-based decision-making processes (Irvin & Stansbury, 2004).

4.2 *Constitution and Constitutionalism in Developed and Developing Countries*

The central questions the constitution in any country seeks to address are: understanding how societies are organized, how social order is maintained, and the relationship between society and the government. The constitution additionally encourages the ideals of patriotism and nationalism and contributes the development of their societies.

According to Lijphart (1999), United Kingdom and New Zealand have constitutions that are “unwritten.” The fact that a constitution is not written has two important associations. First, these kind of constitutions only need to be changed by parliament, for example two-thirds. Many constitutions in developed countries are constructed on liberal foundations and can be historically traced to European countries as both the products of centralizing the forces of absolutism and its opposites. The constitution outlines relations and structures that define how the society and government are intertwined. The assumption is that the constitution is a supreme document that spells out the laws of the land which the government and the citizens are supposed to follow (Dicey, 1960).

Other central questions in public administration would also whether the constitution is respected or the ease at which the constitution can be altered by the executive. Constitutional reforms are supposed to be adopted as a means of transforming lives in such a society and improving power relations (Webber, 2004). In developed countries, changing the constitution is a very rigid process especially if such changes are meant to benefit only a small percentage of the society. However, changing the constitution in developing countries sometimes only requires parliamentary approval, even on vital national issues. Such ease is enabled by significant control of the parliament by the ruling party and executive control of the judicial branch of government.

5 EVOLUTION OF PUBLIC ADMINISTRATION IN DEVELOPED AND DEVELOPING STATES

Hughes (2003) classifies the basic characteristics of traditional PA in seven categories: (1) bureaucracy, where he borrows from Max Weber’s classification; (2) managers strictly following rules; (3) bureaucratic distribution and the nexus between politics and decision-making; (4) separation of politics/management between administrators; (5) the issue of what amounts to the best public interest; (6) neutrality and professionalism of public administrators (Vigoda, 2002); and (7) absolute administration.

The paradigm shifts in public administration occurred due to some factors related to each other. First, in the mid-twentieth century, the problems caused by the rapid growth and expansion of the state under the influence of the Keynesians understanding caused the public sector and its organizational structure to be placed at the center of the criticism. Second, in the theory of economics in relation to the state, there have been important developments in the theoretical systems that explain the relations between state and market economy and that affected theoretical/political considerations considerably (Wu & He, 2009). On the other hand, globalization and technological developments have had important effects on all social structures in general and economic activities in general, which had important effects both on shaping PA paradigm and on the rapid expansion of new world understanding (Lan & Anders, 2000).

The financial crises since the 1970s encouraged discussions on the role of the state and the search for efficiency (Allen, 2016). Debt crises in developing countries are more closely related to this problem because public deficits in these countries are considered a result of the state's inability to exercise appropriate roles. In political terms, in the USA and the UK, conservative governments have come to power and the New Rightist economic policies they adopted had a significant impact on the shaping of neoliberal practices since the beginning of the 1980s (De Koster et al., 2013: 4–8). These policies are mostly based on libertarian economic considerations based on anti-state and market efficiency. It can be said that the practices of the leading countries such as the UK and the USA have shaped the New Public Administration literature. The liberalization policies in developing countries are the reflection of these (Arestis & Demetriades, 1999). On the one hand, policies in developing countries stem from domestic demands based on efficiency and efficiency needs in these countries, and on the other hand, from external policy implications of international donors/incentives and other international consultants such as the Bretton Woods institutions. These institutions have been very effective in the internationalization of administrative structures or in the spread of Western-type administrative structures in developing countries (Henderson, 2001). The reform patterns and good practice guidelines, which consist of practices in developed countries, have been significantly influential in meeting the efficiencies of these countries, and a rapid reform transfer has been made globally (Hood & Lodge, 2004).

Critics of the public sector and its organizational structure firstly state that the size of the state is very large, and it consumes too many resources. Efforts to reduce public spending in many developing countries can be considered a reflection of this development (Fan et al., 2008). The second criticism is directed at the area of activity of the state. According to this, state activities interfere in many areas and there are alternative means of presenting them. From this, many countries' efforts to transfer to the market, liberalize, and privatize a significant part of state activities have emerged. Public enterprises started to become privatized in the 1980s from the UK. Efforts have also

been made in New Zealand and Australia to provide services using the private sector instead of the public sector (Clifton et al., 2006). Another criticism of the state is related to the state's method of producing or working (Hughes, 2003). The provision of services by bureaucratic means has been seen as an ineffective and poor-quality method, and searches have been made for vehicles other than bureaucracy.

After the 1990s, public administration systems of many states were under a great wave of reform (Sköldberg, 1994). The general characteristic of this wave of reform, which has been criticized by both theoretical and practical fields, is that it presents common prescriptions to states with different political, cultural, and social structures and is especially imposed on underdeveloped countries by international organizations. However, the belief that the market provides a superior mechanism in the delivery of public goods and services is confronted with new problems. Because of the differences between countries, the reform efforts they have made in the framework of this understanding often fail and receive criticism from these countries (Homedes & Ugalde, 2005).

6 CONCEPT OF DEVELOPMENT ADMINISTRATION

Although the development concept is not new, it is still in its initial stage. Scholars from different disciplines have made a rigorous attempt to define the concept of development, particularly in the late 1940s. The Brandt Commission Report's definition of development cannot be a universal yardstick for measuring development (Brandt, 1980). According to Uphoff and Ichman (1972), development was a disparaged subject in social sciences and with more application than its comprehension. While others defined it based on increased capacity of the political system, others based their definition on the increased national economy, while others are unable to distinguish between modernization and development (Mwalongo, 2011). Precisely, development consists of various dimensions of political, social, economic, and administrative features (Onder & Nyadera, 2020a; Rondinelli, 2019).

Currently, development is classified and analyzed as "political development," "social development," and "economic development." With regard to public administration, it is "administrative development" (Shaw, 2015). All the above may be perceived as development without being developed. It is important to apply an integrated approach while defining the concept of development. Fundamentally, the main goal of development is to heighten civil rights and political and economic prowess of all people across countries, regions, religions, ethnic groups, and genders.

The developing world found itself in a variegated administrative system due to discerning heterogeneity in its political, social, cultural, and economic contexts. Common heritage illustrated in India, Sri Lanka, Pakistan, and Bangladesh predominates in the administrative system in aspects like revenue administration, secretariat administration, and the district system, even though evolved indigenous patterns make them different from other developing world

countries. Discernible patterns of administrative systems dedicated to development administration still exist despite the disparity in the behavioral and organizational patterns in the bureaucratic systems. Nevertheless, the imperceptible difference between development and non-development administration should be accepted, enabling developing countries to apply varying proportions of both developmental and non-developmental setting in administrative characteristics.

7 CHARACTERISTICS IN PUBLIC ADMINISTRATION IN DEVELOPING AND DEVELOPED COUNTRIES

Development remains an important aspect of politics with the government playing the major role in national development (Escobar, 2011; Sapru, 1980). An important mechanism in the development process is public administration. The instrument of development administration is utilized to carry out complex activities of the government (Chandler & Plano, 1982: 43).

In addition, in developing countries, national goals are defined, consolidated, and implemented using development administration as an instrumental means (Minocha, 1983). The development administration concept emanated immediately after the Second World War. Development administration can be discussed in several contexts although its relevancy depends particularly on the systems which impact it and vice versa. Nonetheless, the universality of development is often linked to social, economic, and political contexts. In the recent years, further adjustments to the concept have expanded it to include the idea of human security, changing food security goals to seeking better nutrition as well as expanding the idea of literacy to competence, among other changes.

Administrative development is defined as the accretion and extension of a bureaucratic organization as the core tool for program implementation. Bureaucracy plays a major role in policy implementation. Judiciary, legislature, political parties, electorates, and interest groups have a significant duty in political development. However, roles played by the judiciary, legislature, political parties, electorates, and interest groups cannot be disregarded. According to Riggs (1965), public administration is a fundamental requirement needed to improve lives of people in developing countries. Furthermore, public administration and economic growth cannot exist with development administration (Palombra, 1963: 65–69).

Fainsod (1963) advocates improving development administration by implementing training public servants handling it. Moreover, the social-political environment extricates its energy regardless of emphasizing bureaucratic dependability regarding successes or failures of governmental goals. Hence, bureaucracy is also called the “rule of administrative official” (Hope, 1977; Swerdlow, 1963). Riggs (1970: 23–29) further discerned that it is a solid organization comprising of similar roles that handle bigger social entity or systems as agents. This has been illustrated in the various state public servants, while performing political roles has exploited their power (Loveman, 2006).

Bureaucratic powers have been stabilized in many new states by possessing extra-bureaucratic institutions, consisting of electoral systems, an elected assemblies, and a party systems. Riggs (1965) further affirms that for the successful formulation of any modern government, the balance of power between political and administration or political representatives should be adopted. This balance exists in the USA and other Western politics, whereas in developing countries there is inequity in the power of the constitutive system and the power of bureaucracy, for example elected representatives, political parties, legislature, and bureaucracy (Riggs, 1970). Additionally, Riggs (1980) proposed that in this system, an upper hand is given to attempts to have equal balance in either bureaucratic or political institutions. Reinforcing and enhancing both political and a bureaucratic institution are essential in the political context of administrations. This is to ensure that goals set by developing countries are tampered with (Saloxiddinovich & Ugli, 2020). In developing democracy, advanced administrative practices determine the achievements of administration development and therefore go concurrently.

8 ECONOMIC CONTEXT

Riggs (1965: 41) notes that the economy should be at an exceeding level not only to cater to the need for primary produces but also to support employees from both public and private sectors involved in secondary and tertiary occupations. An increase in the GNP per capita is the basic objective for a country's development. However, it depends on the economic development. Besides that, the growth in special departments and agencies of the government as well as the bureaucracy ought to reflect the development in a country. A country with a tremendous economy can create a powerful bureaucracy with abilities to carry out programs that strengthen economic productivity and contribute immensely to developmental goals described based on national development strategies (Riggs, 1970).

9 SOCIAL CONTEXT

Development administration goes beyond economic development and touches on key social issues that affect the daily life of a citizen (Esman, 1988). Due to formal organizational pressures, these goals are taken into consideration. On the other hand, there is an increased number of new states. These formal organizations tend to arise from Western political and administrative models. Normally, in developing countries, these organizations possess endowed interests and are usually dominated by ruling parties on government officials with links to the powerful entities.

In most cases, such organizations tend to focus on leaders' interests and not those of ordinary members. However, the situation is quite different

in the developed system. Developing society must establish such organizations that can sustain advancement in their organized activities. In the development administration context, the three dimensions of development: economic, political, and social are interconnected with each other (Khator, 1998). Ideally, the topic of political development administration points out the need to equalize politics and administration. The economic context stresses the increased income per capita, while the social context emphasized the improvement of the people's welfare which is the paramount goal of development in the final analysis. Riggs (1970) further opines that the level of a society's development can be examined by looking at other features such as organizational maturity, balanced polity, and salary systems within the society's bureaucracy.

Developing countries also have unique features which include:

Mixed Values: Public administration in most developing countries exhibits values of its past colonial legacy and modern values acquired after independence. However, bureaucrats manifest traits of authoritarianism, paternalism, aloofness, and elitism (Onder & Nyadera, 2020b). Old value-sets are superimposed with the new value patterns such as extension motivation, sympathy, and empathy. Structurally, bureaucracies with such values do not exist and generalist bureaucrats are always reorganized in developments and regularity positions in actual behavior. In both types of positions, their orientation and attitude prevail and the disregard of the expressiveness anticipated in development administration is disregarded in bureaucrats. Unsurprisingly, public administration is performed coinciding with non-development administration. To infuse among administrators' features, efforts have been attempts have been made to make them conclusive to the development requirements. Concerning this, training can assist. However, it is overwhelmed with the duties for improving skills and knowledge in contrast to changing attitudes.

Importance of Developmental Policy-Making: In countries that are yet to develop, formulation of critical policies in sectors such as agriculture, education, health, industries, irrigation, and other related areas is performed by the senior administrators. They developed ingenious ideas and initiatives in the majority area involved; lack of synthesis between them and a multiplicity of policies is the main problem in this sphere. Generally, predecessor's policies are always dismissed by the new regime or chief executive and formulate new policies and programs. Besides, administrators strictly adhere to regulations from their political master's regulations. In case of change, their function in policymaking abides to ensure development administration success.

Planning System: Planning has been adopted as a crucial tool of development administration in all developing countries. In India, Sri Lanka, Bangladesh, Pakistan, and other developing nations, well-defined organizations with the mandate to manage policies have been formed at federal, state, district, and local levels. To conscientiously implement national plans, the socio-economic development approach is placed in plan documents with the cooperation of the national planning body. Recently, the role of government

appears to have been reformulated emergence of liberalization and privatization. Unfortunately, there has been fear of downsizing the government and privatization of development functions. This has led to the reduction of detailed planning scope; rather, one may detect the conjunction of the emergent “indicative” planning and the traditional government planning. The conformity indicative planning and detailed sectoral is expected to remain.

People-Centered Development: Emphasis on the promotion of decentralized governance for development has been observed in all developing nation. Responsibilities of managing development programs at the city, district, town-block, and villages have been given to the decentralized institution of governance. For example, the constitution in India has been amended consecutively from 73rd and 74th Amendment Acts. In Pakistan, Sri Lanka, and Bangladesh, powers and functions have been devolved to decentralized institutions. The main goal is to produce a more responsive development administrative system. Furthermore, there is the promotion of non-government organizations, voluntary agencies, and cooperative organizations on functions whose goal is to develop particular groups or areas. Ultimately, there is a modification of the administrative notion.

Weak Vigilance System: Corruption continues to putrid the administrative system in developing countries despite the low ratings based on public integrity from Transparency International. The safeguarding body needs to be strengthened in these countries. Furthermore, for effective control of misconduct and bribery in public life, the judicial and legal system needs to be more efficient. Transparency results in the immense growth of development administration. It, however, depends on the change in perception of bureaucrats. According to Fred Rigg’s (1970) findings, “bureaucrats is preferred for personal expediency as opposed to public-principled interest” in developing countries. Suitable control training and mechanism are needed to revert preference needs.

10 DEVELOPED COUNTRIES

State-of-the-Art Technology: Developed countries experience better progress in the adoption of technology in different sectors be it production, communication, security, health, education, and even public administration. Such progress clearly distinguishes developed from developing countries given that the latter struggle to adopt technology due to economic constraints and inadequate capacity. For example, in most developed countries, the information technology revolution impacted administrative systems much earlier than in developing countries. The computerization level in administrative management in the USA, UK, German, and Japan, over the past three decades, has been consistently high. This has contributed to the development of significant public policies, logical decision-making, development programs monitoring, project implementation, and vigilance regarding system delivery.

Ideally, the confidence level of people increases correlatively with an increase in “penetration capacity policy.”

On the other hand, developing countries are struggling to adopt technology in managing public administration. This does not mean that efforts are not being made to integrate technology in many developing countries. The challenge impacts on the extent to which this new practice can be rolled out. For example, this is especially difficult given the high cost, human resources, lack of stable internet, energy/electricity, and technological capacity needed to implement e-governance and technology in public administration in many developing countries.

Effective Integration: With improvement in technology and research, there has been a positive trend in the integration of developmental administration. This trend entails two dimensions which include the top-level hierarchy in the government which can consolidate information and decision-making via a sequence of the institution working directly under the chief executive. The second-level hierarchy merges specific mechanisms at several levels, bringing about synchronization of government organizations that require common collaboration and coordination, which have to be fabricated.

Public-Private Partnership (PPP): Historically, state-owned entities dominated the economy; however, for countries such as Britain, Margaret Thatcher’s economic reforms were brought about not only through industrial denationalization and commercial operation but also by establishing big scale privatization process. Similarly, President Reagan in the USA also devoted to liberalization and the two became the bearers of a new age of economic reforms in developed countries where private sectors were given a central place in national economies. This movement has been adopted in all countries. In these countries, the bureaucracy was made to function as a “facilitator” other than what it initially used to be as a “regulator” and the effects of the new system of bureaucracy were also experienced in underdeveloped economies in Asian Tigers and South Korea. Consequently, these illustrations show an observable effect on developing countries where developed nations devour the philosophy and practice in developing growth process. Currently, countries across the world are relying on PPP to peruse development.

Participatory Governance: In most advanced Western countries, development administration is the primary duty of local government agencies. On the other hand, developing countries like India, Sri Lanka, Pakistan, and Bangladesh are still overshadowed by their colonial heritage. Despite the decades of independence, they have failed to denounce the governance of autonomous structure that is influenced by genuine power in contrast to program formulation and enforcement. As the scarcity of resources prevails, the domination of the local self-governing institutions has proven futile in most developing countries. Moreover, these countries have entrusted their decentralized governance bodies with resources and power in initiating, guiding, and regulating the socio-economic development process in the individual institution.

High Degree of Professionalization: The intensity of internal specialization of bureaucracy is a result of functional specificity and structural differentiation. Implementation is observable on recruitment to civil service which is based on the applicant's merits and educational background. In countries like the USA, France, Japan, and UK, the technocrat has a responsibility to perform administration roles and affairs of the organizations related to development administration. The generalist administrator legacy still dominates in Great Britain since the late 1960s. Specialization in the structure of bureaucracy continues to escalate as a result of the recommendation of Fulton Committee implementation. From Heady's (1998) observation, bureaucracies in developed countries display "a sense of professionalization, which involves public service being perceived as a profession and inclusion of technical and professional specialization within amenities such as nuclear engineering, law or social work."

Recruitment of civil servants is based on "achieving" in contrast to "ascription" in developed nations. A person joins the civil service not only by merits, but competence propels him to a higher rank in the governance system. In most developed countries, the elasticity of civil service recruitment at a higher rank is characterized by merit. This allows for more competent individuals who have the specialty in various realms of development administration to be appointed into the civil service through "contractual" and "lateral" entry appointments pattern. Service compensation systems and service conditions for those joining civil have been made pliable to accommodate and retain them for the needed period. Accordingly, in developed nations, a self-motivated individual is not only recruited through aggressive recruitment into the administrative system, but also they are provided with essential desirability and also supports to maintain them.

Training: In the majority of developed countries, public employees receive conscientious training throughout their careers. With a competence-based educational system background, they are well equipped through specialized training that enables them to tackle technical duties related to development administration. Institutions offer specialized training in a specific area of governance in all developed countries. These trainings are imparted in both attitudinal transformation and domain of skill developments and knowledge enhancing whenever required.

Differentiation Levels: Administrative systems in advance economies are particularly functionally specific and differentiated. This stature is a result of gradual change of the politico-administrative systems where the need for executing a certain function results in the emergence of new governance institutions. "Stable growth" phases have been experienced in most governments in developed countries; hence, new responsibilities have been assigned to current institutions or in new structure creation for performing arising functions. This consequently leads to the emergence of a highly specialized administration system that involves modulating section of development such as commerce, industry, education, and agriculture.

11 CONCLUSION

In spite of the fact that in various countries public administration has essential features, it is possible to recognize a global trend in a universalization of the general principles and approaches in the sphere of public administration. It is generally possible to talk about the distribution of public administration models invented in developed countries and spread to the rest of the world. However, adaptation of these models happens unevenly. In many countries, the ruling clique is interested in maintaining the status quo as their situational stability and economic status and privileges rely on it. Characteristics of public administration in the modern world include: an increase in a role of the executive authority, strengthening of state regulation of economic and social development, democratization of the electoral system, and integration and globalization. Focus is on the creation of real societies with justice and equal opportunities. In policy, it is expressed in control of democratic parliaments over the economy designed to provide full employment. Freedom of enterprise, making profit, and paying taxes are encouraged fully within democratic laws; it is also known as the separation of capital as property from management functions, reduction of income from property in a national income, and strengthening the role of managers in administration are characteristic.

By the end of the twentieth century, effective civil society structures formed in developed countries and they are ready and able to take on functions that had previously been the state's prerogative. Civil societies consider themselves as more effective than the state in promoting and addressing socially important functions. The administrative personnel in developed countries in general correspond to classical canons of Weber's bureaucracy, in particular, to such principles as rationality; orientation to the formalized procedures as opposed to personalist orientation to the boss; transparency, clearness, accountability to society; and resilience in relation to practicing corruption. The modern state should not carry out all tasks facing it, but it is obliged to provide performance of these tasks. It is about a new division of responsibility between the state and society. The question consists in what tasks the state has to carry out and what can and have to be carried out by non-state institutes. Strategic functions remain behind a state machinery whereas other functions connected with service and which were earlier carried out by the state were assigned to commercial structures.

During administrative reforms in the majority of developed countries, the main objective was to ensure effectiveness. This was achieved by reducing state involvement in economy, decreasing government expenses, ensuring transparency, efficiency of functioning of a control system, expansion of the sphere, and quality of use of the meritocracy in the public service. In developed countries, stability is usually a central feature. Stability of society means that the state control system and mechanisms of economic and social regulation more or less adequately react to the appearing inquiries and expectations of citizens and promote their satisfaction. Stability of society depends on the

level of an institutionalization of the managing structures and legitimacy of state governing bodies. The developed states differ from less developed with unstable political systems, high level of an institutionalization, complex legitimacy (legal and public), and broad participation of citizens in management of the public and public affairs. System balance of the government and influence on management of political parties acts as the most important political factor of stability.

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Research Methodology in Comparative Public Administration: Significance, Applications, Trends, and Challenges

Murat Önder and Emrah Ayhan

I INTRODUCTION

Making comparison is a human activity to understand and explain similarities and differences among events, cases, concepts, items, and phenomenon. Individuals compare their positions in any society, to those of others in terms of regional and ethnic identities; economic, social, and political positions; material possessions; and so on. Comparison identifies key explanatory and outcome variables, demonstrates the relationships between them, and illustrates these relationships comparatively through empirical evidence in order to generate and build comprehensive theories (Landman, 2008: 9).

Newton and Van Deth (2010: 1) state that there are three important reasons why we need comparative research: (1) we cannot understand our own country and our own ways of doing things without a knowledge of others; (2) we cannot understand other countries without a knowledge of their background, culture, institutions, and history; and (3) we cannot make valid generalizations about government and politics without the comparative

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method. This is because it would be easy to come up with false conclusions through considering only one or few cases. In this context, Comparative Public Administration (CPA) as a subfield of public administration analyzes administrative processes, systems, and institutions comparatively. Hence, the comparative method is vital for both practitioners and academicians of public administration. Administrative knowledge becomes more practical and scientific with the comparative perspective (Islam, Bingöl et al., 2020; Islam et al., 2021; Islam, Önder et al., 2020; Nyadera & Islam, 2020). By increasing the share of comparative approach in the discipline and putting it in the center, empirical base of public administration grows stronger (Otenyo & Lind, 2006: xxix).

Scholars engage in CPA research for two broad and related reasons (Kennedy, 2013: 162). Firstly, there is a growing interest in varieties of institutional approaches to public administration and the consequences of similarities and differences between bureaucracies and political systems. Comparing similarities and differences is beneficial to learn lessons about governance by analyzing changing patterns of organization and control in different countries. There is another reason that is more practical and pedagogical in orientation. In this second approach, there is evaluation of the day-to-day, largely technocratic challenges faced by public officials all over the world. It focuses on translating and applying the best practices and most effective solutions adopted by others, to the common challenges in our own countries. Considering these reasons, cross-cultural comparisons significantly help students' knowledge and capacity to make better judgments for the countries they research on (Jreisat, 2005: 232).

Heady (2001) argues that the ability to understand one's own nation is restricted without knowing other nations. In this sense, CPA is struggling to accommodate two seemingly inconsistent tendencies (Heady, 1990: 3): (1) trying to "generalize by making comparisons that are as inclusive as possible, and by searching for administrative knowledge that transcends national and regional boundaries", and (2) having a case-specific or idiosyncratic analyses "with only scant attention, or none at all, to foreign experience". Moreover, the idea that there is one model or set of principles that fit all countries is suspicious (Kennedy, 2013: 162). Therefore, Heady (2001) firmly urges all public administration scholars to be aware about governments and governance systems in other countries other than the United States of America (USA). During his lifetime, Heady advocated for "mainstreaming" the comparative perspective into all public administration fields (Jones & Klingner, 2007: 188). Similarly, Riggs states that "the processes of generating reliable administrative knowledge and developing trusted administrative principles are inherently comparative" (Jreisat, 2005: 231).

CPA as an interdisciplinary field conceptually and methodologically benefits from other academic fields. Both quantitative and qualitative research methods are used to test current theories or build new theories and do in-depth analyses. CPA scholars have opportunity to use a number of approaches, methods,

and techniques to better understand wide range of problems and questions in their fields. Comparative methods seemed not to be properly and widely used, and systematic knowledge creation is not sufficient enough in doing research in our field. Therefore, this book chapter discusses how to do research in CPA theoretically and practically. In this direction, comparative methods and related quantitative and qualitative methods have been introduced to help students and scholars in avoiding research inaccuracies, and CPA research standards have been examined for researchers to gain a more sustainable and objective perspective for the world we are living in. In addition, we provide readers commonly and widely used research models and designs that help to organize their research and avoid or reduce mistakes and biases.

2 PUBLIC ADMINISTRATION AND COMPARATIVE PUBLIC ADMINISTRATION

The word “Administer” originates from the Latin word “ad” and “ministrare”. It means “to serve” or “to manage”. Administration could be described as management of private or public affairs. Subsequently, administration is an effort of a group of people to attain defined goals; so public administration (PA) is an effort of groups/individuals to reach the objectives of the public. Public administration is more associated with the activities of government and the administration of public concerns (Harris, 1990: 3). For instance, Rose (1984: 13–14) describes government as “a formal administrative structure, established by the constitution, which is responsible for the mobilization of laws, money and employees and the conversation of these resources into program outputs”. Therefore, public administration recognizes the mobilization, deployment, and management of human, financial, physical, or natural resources to attain the objectives of the government. In that sense, PA is as old as civilization and is very closely related to development/progress since the early ages.

Waldo (1955) describes PA as a process or activity related to the management of public affairs and academic discipline. Other PA scholars defined the term in several ways with various dimensions due to its interdisciplinary nature. For instance, Shafritz et al. (2017) benefit from many definitions to capture the richness of “public administration”, and they clustered them into four main categories as political, legal, managerial, and occupational. It is within the framework of multidisciplinary perspective, in which the political, legal, managerial, cultural, religious, and institutional aspects of public administration are transformed into practice and work of government by public administrators. Therefore, we offer to include and benefit from cultural, religious, and institutional dimensions to better understand public administration comparatively, so all these dimensions are addressed together in country case studies in this book.

CPA as a branch of public administration focuses on comparative analysis of administrative structures, functions, processes, and institutions. Comparison

is not a new phenomenon. We are oblivious of the fact that early philosophers and scholarly works have used comparative analyses. Even Aristotle makes comparison of different political regimes (monarchy, tyranny, aristocracy, oligarchy, polity and democracy) by using two main criteria. He firstly asks “Who governs?”—an individual, a family, group, or majority. Secondly, he questions “Who benefits from the regime?”, which is more important for him—the ruler(s) or the public which is ruled. His methodology and classification for comparison influenced many scholars. Since then, CPA served for continuous theory search in the field of public administration to formulate a universal theory of public administration (Ayhan & Önder, 2017; Heady, 2001). It also contributed to the richness of the public administration field with unique aspects of different practices with recent postmodern influences.

It is generally assumed that the goal of public administration as social science is to discover laws of nature to explain and predict why certain events occur. In the social sciences, universal knowledge is usually conceptualized in terms of the extent to which a research finding is generalizable or invariant across different national settings (Cheng, 1994: 163; Przeworski & Teune, 1970). Based on this positivist paradigm of universality of public administration, we cannot explain the public administration systems in developing world that have different contexts (Neuman, 2014; Rutherford et al., 2017). Traditional development administration erroneously assumed that Western techniques and structures were superior to their indigenous counterparts. Therefore, development administration failed due to being unaware of or ignoring the unique cultural and historical factors, because these factors led to the success of Western management techniques (Fredland, 2000; Riggs, 1998); however, even quantitative methodologists were keen to understand contextual variable to search universal knowledge (Cheng, 1994: 164–165).

Recently, CPA (as a subfield of public administration) seeks alternative governance models as outcomes of cultural contexts (historical, economic, political and social) and compares capacity of administrative systems based on their unique underlying socio-political and cultural trends and conditions (Heady, 2001; Jreisat, 2011; Önder & Nyadera, 2020; Van Wart & Cayer, 1990). These multidimensional aspects and richness in theory and practice also directed the CPA discipline to benefit more from variety of quantitative and qualitative methodological approaches to capture the complicated world of public administration (Ayhan & Önder, 2020; Morçöl, 2005).

3 TRENDS IN COMPARATIVE PUBLIC ADMINISTRATION

Riggs (1962) mentioned about the trend in CPA research from normative to empirical, from ideographic to nomothetic, from closed system to the ecological approaches, and from national to international settings (Pollitt, 2010: 761–764). Normative approach aims to prescribe “ideal” or “better”, patterns of administrative structure and action, that are implicit in most of the so-called

principles of public administration and very clear with “one best way” in “scientific management”. Riggs (2010: 750) argues that ideal or best ways reflect or mirror their (USA) own cultural values, and the establishment of United Nations (UN) mirrors these values. He also sees a trend toward more empirical and explanatory approaches. By ideographic, Riggs (2010: 752) explains the approach concentrating on the unique case—the historical episode or “case study”, the single agency or country, the biography, or the “culture area”. Nomothetic approach seeks generalizations, “laws”, hypotheses that assert regularities of behavior, and correlations between variables. Although administration and politics are included as parts of a total system (Islam, Bingöl et al., 2020; Islam et al., 2021; Nyadera & Islam, 2020), Riggs (2010: 756–757) argues that some comparative works often fail to explain how the geography, the history, or the social structure actually affect the administrative systems. Therefore, methods of these comparative works are not truly ecological, which implies not just a characterization of environments, but rather analysis of the patterns of interaction between the subject of study and its environment.

To be able to understand trends in CPA research, it is essential to cover past, present, and future methodological trends in public administration field since it has similar reflections. For instance, Sigelman (1976: 622) found that 46.3% of 82 articles in *Journal of Comparative Administration* between May 1969 and February 1974 were dominantly essays, while 35.4% of these articles were categorized as empirical non-quantitative studies, and only 18.3% of these were empirical quantitative. On the other hand, Van Wart and Cayer (1990: 245) analyzed 253 articles in 20 English-language public administration journals which were published between 1982 and 1986. They found that 66% of the articles were one country case study, while 7.1% were non-empirical, and only 26.9% were multi-country comparison. Similarly, Pollitt (2011: 826) analyzed theory, methods, journals, and other actors that have influenced CPA field, and concluded that the volume and variety of CPA research have increased considerably after 1980s, but they are deprived of theory and robust methodological approaches. Fitzpatrick et al. (2011: 826) made a content analysis of 151 CPA articles from 28 PA journals that were published between 2000 and 2009. They found that the methods used in CPA research were largely qualitative; with a heavy reliance on existing data, sample sizes were small and purposive.

Gulrajani and Moloney (2012: 78) examined empirical CPA studies on developing countries in leading international publications in order to present intellectual history of administrative studies of the Global South. They found that these studies are small-scale, disparate, descriptive, qualitative, and non-comparative subfield. They argue that Northern scholars are not highly interested in studying other nations, but it is necessary to advance a vision for PA as a global social science. Önder and Brower (2013) have separately made bibliometric analysis of the articles published in *Public Administration Journal* in Turkey between 1990 and 2009. The articles were generally written by academicians rather than practitioners; theory development was weak, and

sole literature review was dominant; research design, qualitative, and quantitative methods were not used sufficiently (Önder & Brower, 2013: 136). Similarly, Sanina et al. (2016) examined articles published between 2010 and 2014 in eight PA journals in Russia in terms of subject, author, and methodology. They found that the majority of article authors were academicians and that the articles written by practitioners tended to decrease over the years. Regarding the use of methodology, they concluded that 85.4% of the articles lacked theoretical basis and qualitative methods were preferred over quantitative methods. In contrast, Önder and Nyadera (2022) found in their research, which analyzes articles between 2010 and 2019 in four public administration journals in the USA (Administrative Science Quarterly, Journal of Public Administration Research and Theory, Public Administration Journal, Journal of Policy Analysis and Management) that public administration studies have been using more quantitative than qualitative techniques, and the number of studies using mixed methods is also increasing.

Even if PA research is getting more quantitative by the time in Western countries (Battaglio & Hall, 2018; Önder & Nyadera, 2022), public administration and CPA research in developing countries generally seem to be still primarily qualitative, making extensive use of existing data and with small number of case studies. Fitzpatrick et al. (2011: 821) recommended an enhanced application of mixed methods, increased use of culture as a key concept, and integration of a broad range of social sciences to encourage more researchers to consider and make comparative analysis to contribute to the field of public administration. This is because good theory building and guidance in CPA for practitioners are proposed by different types of research; causal, descriptive, and exploratory; essays and research; studies with large and small sample sizes; research applying complex multivariate statistics; and research benefiting from accepted qualitative methods (Fitzpatrick et al., 2011: 827). Nonetheless, concepts need to be defined and equivalence issues across cultures should be considered; methods need to be described; and more and different methods, which are appropriate to the sample size and subject of study, need to be used to reach reliable, valid, sound, and useful outcomes for practitioners and researchers. This book chapter, therefore, aims to promote variety of qualitative, quantitative, mixed, analytic methods but by focusing on the big questions of CPA. In this direction, this chapter covers theoretical backgrounds, significance of each methods, and explanation of them briefly by considering social, political, and cultural context of CPA research. Main challenges in CPA research have also been discussed to improve methodological use in the discipline.

4 COMPARATIVE RESEARCH

Similar to natural sciences, social scientists also use various concepts and approaches in order to evaluate research problems in their fields. Some of them focus on explaining historical factors and concepts, while others benefit from

mathematical calculations. In a comparative research, comparison of different theories and practices in different places, countries, times, cultures, and populations or sub-groups within a country is necessary (Harris, 1990: 113; Newton & Van Deth, 2010: 4). Particularly, comparative research in PA generally means the comparison of political patterns and administrative processes in different countries by a “cross-national” research (Newton & Van Deth, 2010: 4). However, the scope and approach in comparative research depend on interest, experience, approach, capability, and choices of the researchers. Therefore, this part covers logic and philosophy that social scientists use in comparative research.

4.1 *Defining Comparison/Logic of Comparison*

Science is a product of accumulation and comparison of different researches. As a broad meaning, “comparison” means comparing places, cultures, and times. In the narrow sense, using “comparison” as a method means comparing “large macro-social units” as cases such as societies and countries that are used for explaining and interpreting macro-social differences (Ragin, 2014). Apart from these meanings, we can simply define comparison as searching for similarities and differences between two or more units. That is, the principal goal of a comparative research is to seek for similarity and variance. The search for similarity puts emphasis on universal findings or underlying general processes across different contexts. The search for variance, on the other hand, puts emphasis on differences in order to understand specificities (Mills et al., 2006: 621). In social sciences, researchers also compare different cases, concepts, places, and factors to construct significant results. Also, social science research and methodology include both comparative and non-comparative works (Ragin, 2014: 1–2).

Having accepted the significance of comparison, we need to focus on the question of “How to make a comparison?” Comparison is an indispensable necessity for understanding the world in almost every field of human life from the learning ages to the academic studies. Thinking without comparison seems impossible in our daily life and scientific research. In the absence of comparison, any scientific thought and research could be possible. Individuals make comparison by using many adjectives, such as good, bad, sweet, reasonable, tasty, and expensive, while making their decisions on investing, traveling, and eating. While making investments, evaluating their employees, and evaluating the institutions and other transactions, we make comparisons such as successful/unsuccessful, logical/unreasonable, profitable, and harmful. Any organization embraces comparison as a tool for determining and adopting policy, developing discourse, measuring performance, searching best practices as in the case of benchmarking, and making other analysis.

Apart from individual comparison, if we focus on comparison in terms of academic field of PA, we consider primarily academicians and practitioners’ comparisons to understand the related phenomena. The academicians make

comparisons based on the data and results that the practitioners implement. As a result of these comparisons, they test their hypothesis, develop theories, and provide policy recommendations. On the other hand, practitioners do collect qualitative and quantitative data, and do comparisons to use and improve themselves and their institutions directly in real life. In other words, they use this data to make better policy and implement them more successfully. There is an interactive process between practitioners and academicians. Academicians benefit from practices to develop theories, and practitioners benefit from policy recommendations that are made by academicians relying on sophisticated comparisons.

4.2 *The Most “Similar” and “Different” Systems Design*

A researcher must consider about comparing “most similar” countries by examining and describing administrative processes or institutions, or “most different”, or some combination of the two (Fitzpatrick et al., 2011: 826). Sartori (1994: 17) recommends a careful mix: “If two entities are similar in everything, they are the same entity; if they are dissimilar in everything, they are not comparable”. In fact, appropriate selection and sampling is a significant methodological issue in CPA research.

Scientific comparison is normally used to test hypotheses, but also it can contribute to the inductive finding of new hypotheses as well as to theory building (Collier, 1993). Therefore, researchers employ different systematic and organized methods for seeking knowledge in their fields. In public administration, on the other hand, the primary purpose of comparative research is to develop administrative knowledge by comparing experiences in different cases, which have some social, political, economic, and historical factors influencing public administration. For instance, Przeworski and Teune (1970: 8–9) state that comparative research is the process of theory building and theory testing where the names of social systems are replaced by the relevant variables. They aim to treat interactions as systems or cases that can be sectors, countries, or organizations.

In public administration, with the help of cumulative administrative knowledge, general patterns can be discovered. These patterns and regularities lead to making generalizations. These generalizations can be either used for theory construction or reform efforts as applications (Jreisat, 2011: 86; Otenyo & Lind, 2006: xxi–xxii). J. S. Mill developed the method of difference and method of agreement in order to identify similarities and differences by comparing cases. The method of agreement is based on elimination of some factors if they are not valid for all countries that are compared. This method “explains some common outcome by discovering the causal circumstances common across cases” (Dodds, 2013: 319). For example, a researcher might compare the causes of drug use such as unemployment, lack of control, poverty, and education in two different countries, A and B. If poverty does not exist as a factor in country B, the researcher eliminates this factor from

comparison. However, this factor might still be a factor for country A. Therefore, this method might not reveal the necessary link between cause and effect. The method of difference looks at deviations of certain outcomes in different cases with same attributes, while the method of agreement looks at similarities between cases that have different attributes (Pennings et al., 2006: 37). For instance, Skocpol (1979) analyzed the causes of social revolutions by comparing the conditions of Russia over time between 1905 and 1917. He argues that Russia in 1905 was the same Russia in 1917, but the revolution had occurred in 1917. However, Dodds (2013: 320) says that this comparison might be problematic because “1917 Russia had already experienced 1905 Russia, whereas 1905 Russia had not”.

In time, Mill’s model has been developed further, and the most similar and different systems designs have appeared. The main logic behind the most similar systems design is to find significant differences among similar systems and attribute these differences to cause and effect relationship. By using similar systems, it becomes possible to control all variables that are similar across systems. By this way, same independent variables in similar systems can be found to explain different dependent variables across these systems. For instance, highly similar countries with different policy outcomes can be used as cases in order to explain the difference in policy outcomes (Przeworski & Teune, 1970: 8–9). On the other hand, the main logic of the most different systems design is to find key similarities between dissimilar systems. Even though there is an inter-systemic differentiation, systems can only vary with regard to limited number of variables or relationships. By this way, different independent variables across dissimilar systems can be found to explain a similar dependent variable between these systems. For instance, highly different nations with some similar policy outcomes can be used to explain similar policy outcomes (Przeworski & Teune, 1970: 8–9).

4.3 *Systems Theory for the Comparison*

In social sciences, various approaches, methods, and tools have been developed to make good comparison depending on the content and the nature of comparison. Ragin (2014: 3–4), for example, claims that the dominance of qualitative studies is the most distinctive feature of the comparative research method in the social sciences. Comparative researchers use cases as a whole and historically interpretive which helps them to compare each cases with various purposes to capture the issue or phenomenon in-depth. In this respect, the main goal of the comparative research appears as replacing names of the variables with those of social systems. For instance, Przeworski and Teune (1970) adopt a system approach. They argue that comparative research should be constructed in macro- and micro-levels simultaneously. While comparing macro-social units in systems level, variables within system level should be taken into account as well. Without these variables, macro-social (system)

level similarities and differences cannot be considered as a valid comparative research (Przeworski & Teune, 1970: 50–51).

Systems theory is a well-known analytical framework, and it is also known as “structural functionalism”, which is developed by sociologists like T. Parsons, M. Levy, and R. Merton in order to study different societies across the world (Heady, 2006: 67). In time, political scientists have also started to use this framework to compare political systems. This framework includes two types of approaches: institutions (structures) and activities of these institutions (functions). There is strong relation between these institutions and activities, but comparative analysis in public administration is made by either structuralist or functionalist approach, because some researchers focus on functions of institutions while others focus on institutional structures in CPA studies. In deciding which approach to use, there are some basic questions that might be helpful. For instance, Peters (1994: 68) asks “What are the limits of the functional and structural mechanism? Which functions, and processes or which institutions and bodies are within the limits of public administration?” On the other hand, Heady (2006: 68) also claims that there is a central question in choosing the approach through structure or function “What functions are performed by a given institution, and how?” Therefore, a researcher should ask these questions before he/she starts a CPA research.

4.3.1 *Functionalist Approach*

Functionalist approach treats society as a system of interconnected parts. This approach is a well-known approach in CPA research, because the comparison of functions is very useful. There are some functions such as interest articulation, interest aggregation, rule-making, rule application, rule adjudication, and communication which are more related to administration rather than politics (Heady, 2006: 68–69). Functionalist approach is accepted as an institutional base, which means different institutions are related to each other in an administrative system. Comparing functions rather than structures in institutions might be more suitable for CPA research, because there might be different functions of structures, or similar structures might not exist in different societies. For instance, Almond and Coleman (1960: 11) also claim that “the same functions are performed in all political systems, even though these functions may be performed with different frequencies, and by different kinds of structures”. However, researchers should be careful in choosing certain functions. If these functions are narrow, or only valid for some certain political systems such as Western countries, the comparison might fail, because it is important that similar functions are valid for the countries which are compared. Considering these risks, functionalist approach is criticized by neo-institutionalist thinkers, who argue that the primary focus should be on structures rather than functions.

4.3.2 *Institutionalist Approach*

Recently, there is an increasing attempt by neo-institutionalists to increase significance of state as distinguished actor different from both “society” and “government”, although these are all related (Heady, 2006: 70). Therefore, researchers focus on state and its institutions in CPA. For instance, Fesler (1988) claims that state is made of large and small parts which share five interrelated characteristics. These parts take actions, hold separate values, have historical background and organizational cultures, and maintain power structures (Fesler, 1988: 894). Although he does not favor it, Almond (1988: 872) agrees that neo-institutionalist approach increased attention on institutional and particularly administrative history in CPA research. Therefore, we can say that neo-institutionalists have a particular interest on the notion of “stateness” which they use to make comparative analysis of different societies (Heady, 2006: 71).

Institutions open gates for new development with their own structures and mechanisms. Functional approach seems to have tendency to disregard new changes and development coming from newer institutional designs. Historical, sociological, rational choice actor-based institutionalism, and institutional economics examine public administrations as institutions even if they have different perspectives in explaining defining factors (Kuhlmann & Wollmann, 2014). Comparativists with interdisciplinary approach generally depending on the available data and disciplines prefer focusing either on functions or on structures in their CPA research.

5 THE CONTEXTUALITY OF COMPARATIVE PUBLIC ADMINISTRATION

Focusing on theory building and generalizability of findings unfortunately disregard the unique situations in different settings, because situations and events are not context free. There are many non-Western countries having social, cultural, and political backgrounds that are different from Western countries. The context or environment, which is difficult to reach an exact decision about it, also contains highly diversified and uncertain situations for different fields. Each discipline is acting separately, and the whole information defined is often not collected in such a way that incorporates the fundamental principles from each discipline (Mcguire, 2012: 2). Public administration has its own principles that are embedded in its distinct context, and it is not possible to conduct a CPA research without considering the context. The context is a fundamental source of impact, because it modifies public administration systems due to its distinct social and political principles and values (Jreisat, 2011: 91). There are two types of national context that need to be considered by CPA researchers: social context and political context. The former is mostly related to national culture and history, while the latter is related to constitutions and legal systems.

5.1 *Social Context: The Relations Between Culture and Administration*

Culture is a decisive factor influencing administrative changes in a given social context (Önder, 2011a). As a term, culture has a continuing reciprocal interaction with language, religion, habits, morals, customs, and laws, which shape human behavior and automatically affect administrative behaviors. Therefore, we need to be aware of the relations between the cultural environment and administrative behavior, which has significant impacts on administrative systems of countries (Jreisat, 2011: 92). Culture is seen as an independent variable, and it is operationalized by isolating its dimensions or by differentiating its effects on administration from other environmental factors. As a social context, culture is important for determining the role of environment and administrative behavior of different countries (Önder & Nyadera, 2020).

Culture has changeable features that are seen in different forms in different environments, and it is accepted as an independent variable to clarify distinctions in administrative practices among different countries (Jreisat, 2011: 92). Especially, national cultural characteristics such as one influential national language, a market for certain skills, products, and services, education system, army, political system, performance in sports events with a powerful symbolic and sentimental attractiveness, and a common mass media provide some important forces to nations for integration and those characteristics have a decisive place on administrative behaviors (Hofstede et al., 2010: 21). Cross-cultural research aims to understand similarities and differences among nations' administrative behaviors, so it is essential to collect data about cultural environment of different nations.

Geert Hofstede (1980), a leading researcher in the field of cross-cultural comparison among countries, found remarkable variations among different countries. His team made an extensive inquiry to classify and define countries for determining effects of culture on administrative practices. In their research undertaken for IBM (1980), they identified four dimensions for distinguishing among different countries: collectivism-individualism, power distance (from small to large), uncertainty avoidance (from weak to strong), and masculinity-femininity as an example model study for a comparative research. They collected a large body of survey data about the values of people in more than fifty countries around the world. Their findings showed that different cultural characteristics of different countries as variables shape institutions and organization in public administration systems of these countries (Hofstede et al., 2010). Those dimensions are firstly defined by Hofstede (1980: 45–46) in 1980 and developed in 2010 (Hofstede et al., 2010);

Power distance is “the extent to which the less powerful members of institutions and organizations within a country expect and accept that power is distributed unequally”. Institutions refer to “family, the school and the community”, while organizations refer to “places where people work” (Hofstede et al., 2010: 61). In high power distance countries,

power is centralized; there are tall bureaucracies, there is an autocratic boss or father, and subordinates are expected to be told what to do. On the other hand, in low power distance countries, there are changeable roles, decentralized hierarchy, and subordinates and superiors that are considered as equals. Various power relations at different level cause inequalities in public institutions and organizations as a result of power distance.

Uncertainty avoidance is “the extent to which the members of a culture feel threatened by ambiguous or unknown situations” (Hofstede et al., 2010: 522). Extreme uncertainties cause intolerable anxiety and result in more strict law and extreme religious practices to reduce it. In low uncertainty avoidance, complexity and risk are valued, and dangerous categories are not welcome.

Femininity-Masculinity expresses that femininity, as the opposite of masculinity, “stands for a society in which emotional gender roles overlap: both men and women are supposed to be modest, tender, and concerned with the quality of life” (Hofstede et al., 2010: 517). In the femininity dimension, both gender roles overlap, both women and men are modest, tenderness is valued, and both are concerned with the quality of life.

Collectivist-Individualist implies that collectivism, as the opposite of individualism, “stands for a society in which people from birth onward are integrated into strong, cohesive in-groups, which throughout people’s lives continue to protect them in exchange for unquestioning loyalty” (Hofstede et al., 2010: 515). In collectivist cultures, people expect their group such as relatives, clan, or organization will definitely look after them, so they owe absolute loyalty to their group (Önder, 2011a). In individualism, ties between individuals are loose, and so everyone has to take care of himself/herself. In collectivism, it is believed that people are strongly integrated into their groups from birth, so they protect their groups with absolute loyalty without questioning it.

5.2 *Political Context: Political Culture and Forms of Government*

Concentration of political power is the main focus of the political context, so the separation of powers, federalism, corporatist versus adversarial processes, and networks are significant topics (O’Toole Jr. & Meier, 2015: 242). To understand political context, we need to start with national histories, constitutions, and legal systems, because they shape distinctive political cultures. For instance, constitutions are controlling declarations of public policy and embodying a society’s fundamental philosophical assumptions about law, legitimacy, and government power. Failure to follow these rules and to operate within the appropriate constitutional context can cause failure of legitimacy, which can be defined as “operational rules rooted in constitutional or societal norms” (Kennedy, 2013: 165). The legal system is significant that draws a constitutionally significant separation between the public sector that can be

described as government and its agencies and officials, and civil society that is defined as the multitude of nongovernmental, voluntary communal, and religious associations through which individuals may act and connect (Önder, 2012; Kennedy, 2013: 166).

5.2.1 *The Effects of Political Culture on Administrative Processes*

Political context includes political culture which can be defined as behaviors toward political system and the role of individual in the system. Political culture consists of set of variables, which have contextual role as well as internal structures and attitudes (Jreisat, 2011: 94). It is a set of principal beliefs, values, and behaviors that defined the nature of the political system and construct the political interactions among its members (Berg-Schlosser, 2012: 46). For instance, political legitimacy of the systems has significant roles in understanding political culture, because political systems carry out their own rules, behaviors, and values which constitute their own institutions and organizations in every field. At this point, political culture, which includes the role of self in the system and those differentiations of political systems and individuals, provides strength to contextual as well as interior structures and behaviors (Jreisat, 2011: 94).

5.2.2 *Types of Government*

Political context is the area for examining the relations between forms of government and political environment. Forms of governance have more effective role than the political culture. There are relations between political environment and administration, which determines conditions and variables, and benefits from empirical evidences and suggestions that are gathered from case studies. Political authority and political values also shape bureaucratic behaviors toward citizens, and public accountability is another element of the political environment, which requires efficiency and responsibility (Jreisat, 2011: 95).

Types of government have an important place for CPA research, which is based on the political comparisons between countries. Types of governance include various variables such as type of centralization and decentralization; citizens' participation in public policy formulation; and the entire concept of legitimacy that is also related to political culture and leadership order. All these variables are important factors that can be used in making comparison for different public administration (Jreisat, 2011: 94). Administrative processes are changeable for different types of government such as democracy, autocracy, monarchy, authoritarian, communist, dictatorship, or theocracy. When comparative researchers are doing comparison in PA, variables of types of government diversify research because of its extensive comparable factors.

Jepperson and Meyer (1991) observe that the institutional theory states explicitly that both formal organizational systems and the rationalized society are dependent on modern polity, as it is embodied in the nation-state. Formal organizing depends on modern polities. They group countries/polities

Table 1 Modern rationalized polity types

		<i>Degree of collective institutionalization of public functions and functional relations</i>	
		<i>Low</i>	<i>High</i>
Degree of authorization of social subunits as public actors	High Low	Liberal/ individualist polity Segmental polity (state outside society)	Statist polity Corporatist polity

Source Jepperson and Meyer (1991: 216)

according to two criteria (Table 1): (1) degree of collective institutionalization of public functions and functional relations and (2) degree of authorization of social subunits as public actors.

They categorize countries according to these criteria. In their categorization, they claim that France, Belgium, Canada (especially French Canada), and Italy are statist societies (high-high) where state exists as “both the model of organizing rationality and the location for the articulation of the general will of society’s actors (the Jacobin vision)”, and Latin American states are examples of segmental polity (low-low) due to “the weak polity and penetration of society”. On the other hand, America, United Kingdom, and Australia embody liberal/individualist polity where “organization of state legally constituted actors is high, while a state controlling and forming interests and choices is (comparatively) low”. Finally, Germany and Austria are an example of corporatist polity where “collective rationalization and institutionalization” is high but authorization of subunits as public actors is low (Jepperson & Meyer, 1991: 216–217).

5.3 *Internal Operating System*

The internal operating system is the management core of the comparison, and it is related to the issue of internal features of systems like budgeting, training, civil service requirement, and so on (Jreisat, 2011: 96). Collecting enough comparative knowledge about operating management systems is necessary to develop conceptual and empirical relations of the analysis. The issues of fiscal, developmental, and public service are important comparable factors in CPA research, because CPA makes investigations on the internal dynamics of public organizations and searches conditions for professionalizing organizations’ management (Jreisat, 2011: 97).

6 DETERMINING UNITS AND LEVELS OF ANALYSES IN COMPARATIVE RESEARCH

In a CPA research, the researcher should also determine levels of analysis and units of analysis for a scientific research in CPA. Therefore, this title offers detailed explanations about units and levels of analyses.

6.1 *Level of Analysis*

A researcher should determine the level of analysis such as entire national systems, particular institutions or institutional processes in the national systems, and group of individuals or individual-level decision-making (Pollitt, 2011: 121). For instance, culture can be analyzed at different levels like national culture, organizational culture, or culture of different group of people. The researcher should also be aware of the fact that all these levels are interrelated, which means that there are complex linkages between them (Peters, 1996: 21–22). There are mainly three common levels of analyses: macro-level, middle-range, and micro-level (Peters, 1994).

Macro-level analysis is mainly more challenging due to comprehensive coverage for comparative analyses, but these studies are useful with regard to ensuring ecological and descriptive paradigms. Jreisat (1975: 667) states that “Macro national administrative research often ends up as an attempt to construct abstract models and typologies which are not conducive to the emergence of many discrete hypotheses confirmed through empirical testing”, because he believes that there are some challenges for this type of research such as “lack of rigor, difficulties of verification, and limited practical application”. Additionally, macro-level analysis tends to simplify very complex social issues and ends up offering simple on the surface analysis.

Middle-range analysis is significant for comparative studies, because it provides enough scope of function and large dimension. Jreisat (2011) claims that middle-range study can create more specific and reliable findings. This analysis provides more efficient tools for evidence. The relevance also is developed through functioning of middle-range analysis that expresses practical knowledge. For instance, national bureaucracy gains information through middle-range analysis. It is also the most influential level for organizational analysis in case studies. For instance, earlier grand theories, developed by social scientists like Marx and Durkheim, focus on national structures and processes in order to understand the mechanism of social reality. Depending on these theories, middle-range researches also cover some specific aspects of social issues. Therefore, middle-range level of analysis works efficiently in CPA research on national bureaucratic systems due to its applicability to the specific and individual cases. Similarly, Jreisat (2011: 101) also states that “Information generated through middle-range concepts can serve as the building blocks for developing models of greater comprehensiveness and certitude”.

Micro-level analysis concentrates on individual working in public service and their behavior in office, because behaviors, performance, and attitudes of individuals influence government's function (Peters, 1994). However, Sigelman (2006) indicates two problems in micro-level researches: exceptional analysis of cross-national scope, and existing analysis literature is dispersed. Micro-level analysis focuses on small part of administrative system, so it limits cross-national research. Comparatively, macro-level analysis is very comprehensive and abstract, while micro-level analysis focuses on individuals, scattered and limited issues. Therefore, middle-range analysis is more effective and reliable for CPA research.

6.2 *Units of Analysis*

In CPA research, it is essential to determine the units such as “(1) individual and group behaviors and performance, (2) the organization and its capacity, or (3) the overall characteristics and performance of a national bureaucracy, including the whole executive branch of government” as the main focus (Jreisat, 2011: 88). Selecting units of analysis helps to determine the approach, methods, and specific techniques in a research. It is again essential to know that these units are also mutually inclusive. For instance, a researcher can evaluate environmental policies by focusing on structure of the related public institutions (the hierarchical structure), processes (how decisions are taken), and actors (attitudes or beliefs of people who are responsible for decision-making) in different countries. The researcher can analyze all these units depending on his fund, data, research area, time, and interest (Pollitt, 2011: 121). For instance, a researcher can choose one unit such as a particular institution from political parties, militaries, parliaments, interest groups, decision-making process in politics, or public policy (e.g., labor, welfare, or social policy) in a country. However, it is hard to make a comparative research when the researchers focus on a single country or institution. Therefore, the unit we chose should include a larger context. On the other hand, studying on two or more units in-depth requires much more time for an extensive comparison than studying on a single unit.

6.2.1 *Regional and Area Studies*

Regional and area studies have been frequently used in social science, especially in international relations. In CPA, researchers studying differentiations between countries within various regions or areas adapting macro-level analysis tend to choose regional or area studies as unit of analysis. This may include studies of Africa, Latin America, the Middle East, East Asia, Southeast Asia, South Asia, Western Europe, Central Europe, or smaller regions. These studies are useful, because different regions or areas involve groups of countries that may have common features such as history, culture, language, religion, and colonial backgrounds. In these studies, researchers can hold common features constant, while examining or testing for certain other features. For example,

Harris (1990: 133) made a comparative research on characteristics of public administration in certain developing regions, and he reached some conclusions about the effects of PA on the level of development by different regions. He emphasized the need of administrative developments in developing regions.

6.2.2 *Global Comparisons*

Global comparisons also adopt macro-level analysis. The data is essential to make global comparisons, but generally researchers hardly find or reach advanced datasets at global level. Therefore, there is a need to develop international datasets, which is a revolutionary thing (Pollitt, 2011: 122), and to increase accessibility of national data not only in developed countries but also in developing and under-developed countries. Recently, with the improved statistical data collected by international organizations such as World Bank, the UN, OECD, and other agencies, it is now possible to make global comparisons. When studying cross-cultural public administration practices comparatively, the global comparisons are useful to capture more idealistic situation (Jreisat, 2011: 27). It is a new global reality for public administration to benefit from global trends and learn from ideal situations, so wider comparative perspective like comparing Western and non-Western systems is expected to be very effective. Global comparisons have potentials to enable identification of common management patterns and practices that are derived from multicultural experiences.

6.2.3 *Thematic Studies*

Possible themes in CPA research are economic and political dependencies, corporatism, the role of the state, the process of military professionalization, civil service systems, central governments, local governments, types of government, reforms, planning, organizing, budgeting, and performance systems. Thematic studies are often more complex since they require more detailed data, and they are usually carried out by more senior scholars. In these studies, collecting and evaluating various situations increase reliability and effectiveness of a research in making generalization. However, generalizations might ignore the concreteness, distinctiveness, and depth of an issue, because a researcher might provide only definition of general patterns and processes by choosing specific characteristics for comparison. Even though there are many topics for comparisons, bureaucracy and organizations are commonly used main topics in CPA research.

6.2.4 *Bureaucracy as a Focus*

The role of bureaucracy as the national administration has had a significant position for all political and administrative processes from the time of Weber until today (Heady, 2001). Some policy implications are allusive in all important administrative behaviors, because some groups, which are clustered around the decision-making processes in administration, also have the power in the society. For instance, Palombara (2006: 204) states that “The

bureaucrats in the field may ally themselves with local elites and politicians and to some extent oppose well-made developmental schemes that emanate from national planners at the center”. Bureaucracy has broad interaction with the public administration system; therefore, bureaucracy has a significant place for the development of public administration. Bureaucracy is considered as a system due to its various parts and units like agencies and organizations which are related in serving the policies and goals of the state. Therefore, it is necessary to make empirical investigation and research on questions such as “What a bureaucracy does in a particular country?”, and “How it is doing it?” need to be answered (Jreisat, 2011: 62). While answering these questions in comparative studies, researchers should focus on understanding different administrative systems through investigation of bureaucracy across countries.

6.2.5 *Organization as a Focus*

The primary focus of public administration for understanding policy capacity is on the “government apparatus and its personnel”; therefore, CPA mainly focuses on two basic units of analysis: individuals and organizations. CPA research on individuals includes studies on roles and skills of bureaucrats, political advisors and managers, and leadership (Walle & Brans, 2018: 107). Furthermore, as a unit of analysis, organizations are superior for comparative analysis because of their durable and measurable characteristics (Jreisat, 2011: 89). They arrange and simplify individual attempts and collect those attempts for serving goals. Aberback and Rockman (1988: 423) state that organizations, actors (managers), and human behavior are “analytic building blocks” of CPA research. In addition, more advanced statistical techniques and current computer technology and software enables us to use organization as small units and make macro-level regional studies across time with complex sets of variables (i.e., pooled time-series analysis and network analysis) recently.

Walle and Brans (2018: 107–108) claim that organizational capacity of government agencies is very significant for CPA. For instance, they examined studies on different capacity types of organizations such as (1) analytical capacity (e.g., e-government and communication, budgeting), (2) operational capacity (e.g., specialization, co-ordination, network governance, and performance management systems), (3) political capacity (e.g., bargains between politicians and bureaucrats), and (4) legal capacity (e.g., legal counsel functions and legislative drafters). Therefore, determining the capacity and characteristics of the organizations in CPA research, and then adapting these differences to the national administrative systems, is a significant step that will affect the development level of the countries. In addition, comparative organizational perspective can help us to understand the administrative processes, structures, behaviors, performance, capacity, and theoretical and applied knowledge about organizations, because organizations are units of continuous collective action that perform or serve goals above and beyond individual capacities, and they organize and simplify individual efforts (Jreisat,

2011: 89–90). However, it is still challenging to compare organizations cross-nationally due to cost, management, and extend of such a research.

7 INFORMATION AND DATA FOR RESEARCH

The purpose of the comparative research determines the types of information, which is required to build theories. There are three types of information used in comparative research: (1) descriptive information, (2) explanatory and analytical information, and (3) prescriptive and normative concepts.

7.1 *Descriptive Information*

Comparative research needs descriptive information to illustrate the conditions of the compared factors as they are. Descriptive information “defines relationships, designates critical factors, expands breadth of coverage, and increases accuracy of analysis” (Jreisat, 2011: 85). In comparative research, basic principle of using descriptive information is to familiarize and introduce the aspects of different cultures and territories. In this context, descriptive studies provide raw data for comparative studies and give initial foresight about which research topics might be important and which factors might be crucial to explain those topics (Landman, 2008: 5). However, it is hard to escape value-laden judgment. The researcher should present awareness and ethics while analyzing descriptive information. Descriptive information is produced mainly with case studies about administrative systems of different cultures in comparative research (Neuman, 2014).

7.2 *Explanatory and Analytical Information*

Once descriptive information is given properly, it is necessary to explain this information analytically (Meier & Brudney, 2002), because it is important to understand why certain administrative factors change from one country to another in a CPA. Therefore, explanatory and analytical information helps us to reveal causality between these factors and find out the rationale of the administrative behaviors, units, and systems to determine policy choices. If this process is appropriate, the reliability and relevancy of the comparative research can increase. Therefore, the accuracy of the explanatory information is crucial (Jreisat, 2011: 85–86).

7.3 *Prescriptive and Normative Concepts*

Prescriptive and normative concepts are very essential, because they constitute the changing phase of a research (Neuman, 2014), and these concepts give information about the current conditions in an administrative and governance system in a country that needs to be changed for improvement. Prescription provides normative solutions and recommendations after administrative factors

and their influence are described and analytically explained. Depending on the previous information, prescriptive and normative concepts state suggestions for “improving service, achieving higher efficiency and effectiveness of the operation, restructuring organizations, developing the human resources, encouraging participatory management” in a CPA research (Jreisat, 2011: 86). Therefore, these suggestions need to display existing conditions and far-reaching impacts of prescriptive and normative concepts on the administrative systems by a comprehensive approach in order to be effective.

8 COMPARATIVE RESEARCH PROCESS

Conceptualization according to models or theories is the first step of the comparative research. Then, formulation of the hypothesis takes place. Operationalization of concepts into concrete measures depending on units of analysis comes next. Testing the hypothesis whether acceptance or rejection is the next step. Final step is to detail tentative classification scheme (Ibietan & Folarin, 2013: 52). Systematic research begins with good description. After concepts and phenomena have been described and classified, the researcher can start to look for factors that could explain what has been described (Landman, 2008: 5). In order to perform this, quantitative comparative research process more or less pursues the following stages (Ibietan & Folarin, 2013: 52; Neuman, 2014):

- Research question is determined precisely by showing the casual relationship among compared factors.
- Research question applies to a general theory or model of public administration.
- According to model, a conceptual scheme is formulated.
- Hypothesis derived from the previous research or research questions/sub-questions.
- Appropriate research methods or techniques are proposed.
- Hypothesis is tested and research findings are discussed.

The research process depending on being qualitative or quantitative research design might be a little different in the stages. Jreisat (2011: 98) offers the following stages for standard comparative research process:

- Defining the social context and establishing the connection with public administration.
- Defining the political context and explaining the effects to the PA.
- Defining the internal operating system.
- Determining unit of analysis.
- Comparing similarities and differences between/among systems and cultures.

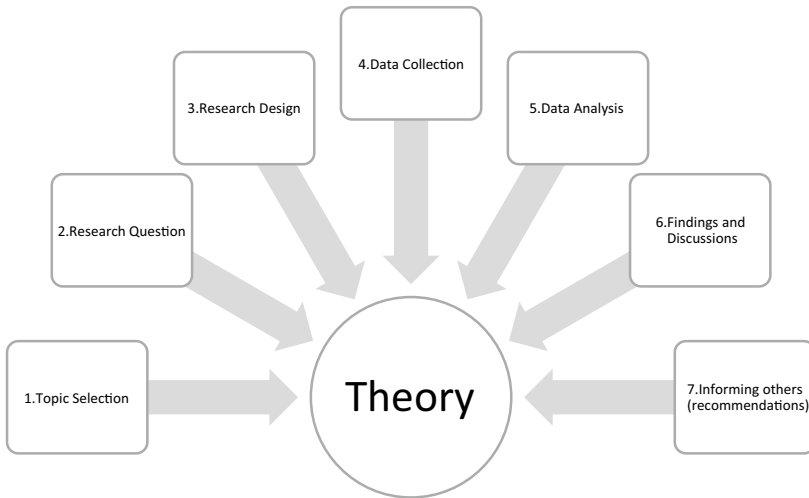


Fig. 1 Basic steps in qualitative and quantitative research (*Source* Authors' compilation)

To sum up, Fig. 1 displays basic steps for a research that is valid for most of the qualitative and quantitative research. Each step is discussed in the following parts of the chapter.

8.1 *Research Questions*

In order to start a research, the researcher is expected to clearly state the added value of the planned research and ask the well-known “so what?” question (Biesenbender & Héritier, 2014: 241). Once the motivation behind the research is described, the research question should be set in a systematic way. Establishing generalizations starts with asking appropriate questions in the right order for a comparative research (Jreisat, 2011: 83–84):

- The objective of the research: “What do we want to know through comparison?”
- The importance and relevance of the research: “Why do we want to know it?”
- The current knowledge for the objective: “What do we already know?”
- Methods and tools of the research: “What tools do we need to know?”

Without a proper research question and research design, the “art of comparing” becomes meaningless and—which is worse—may lead to dubious evidence and conclusions that affect many in society (Pennings et al., 2006: 5). It is crucial to pay attention to theory-driven research question that is being addressed from the initial specification of the research problem from the choice

of countries and method of analysis to the final conclusions (Landman, 2008: 2). In this direction, the researcher needs to narrow research topic by determining a specific research question after reviewing the literature and develop hypotheses that are derived from theories (Neuman, 2014: 18). In addition to research question, Fitzpatrick et al. (2011) reviewed 151 CPA articles published between 2000 and 2009 in order to find out how they contribute to CPA research. They argued that it is also necessary to ask some big questions in a CPA research such as “How is CPA research framed?”, “What are the subjects of focus in comparative research?”, “What methodologies are used?”, and “which criteria should be used to select countries to be studied?” (Fitzpatrick et al., 2011: 821–824). These questions help us to understand recent trends and CPA research, because without appropriate framework, focus on subjects, case countries and methodology, and big questions CPA research area cannot be developed.

8.2 *Hypothesis Testing*

Potential answers to the research questions are called hypotheses. Hypotheses that are derived from theories are “used to test direction and strength of a relationship between variables” (Neuman, 2014: 183). The first step in a hypothesis testing is to formulate hypotheses based on existing literature on theories and previous findings and descriptive analysis: What relationships between dependent and explanatory variables are hypothesized and why? (Van der Heijden, 2014: 50). While formulating hypothesis, cause and effect relationship should be addressed. The second step is to select a number of primary cases and to examine them in detail. The researcher analyzes the primary cases and investigates a different set of cases using the contrasting approach in order to falsify the hypotheses developed (Van der Heijden, 2014: 51). Thus, all hypotheses can be tested across multiple cases and they should be falsifiable. Neuman (2014: 184) argues that negative evidence is significant, because “instead of gathering supporting evidence, testing that no relationship exists provides more cautious, indirect support for its possible existence”. The third step is selecting a number of secondary cases within the primary cases and examining them. The researcher studies these cases in order to understand whether falsifiable relationships between explanatory and dependent variables are applicable for a larger number of cases or not. Hence, it becomes possible to generalize the findings in other social settings beyond the primary cases and to strengthen the external validity of the study (Van der Heijden, 2014: 52).

8.3 *Prediction and Explanation*

After testing the hypothesis, the researcher can move on to search for the logical extension of hypothesis testing. The generalizations from the comparison in CPA research help us to make predictions about the outcomes in other social settings (Landman, 2008: 10). However, many people confuse the

difference between explanation and prediction. Prediction can be defined as “a statement that something will occur” while explanation “logically connects what occurs in a specific situation to a more abstract or basic principle about ‘how things work’ to answer the why question” (Neuman, 2014: 73). Prediction is easier than explanation, because explanation needs good theory and empirical evidences. For example, someone might predict that there will be sunset tomorrow as it happens every evening. But at some point, he/she might give explanations for why the time of sunset changes every evening and why it does happen by giving evidences from astronomy. Therefore, while making prediction in comparative research, it is important to make it in probabilistic terms, such as “countries with systems of proportional representation are more likely to have multiple political parties” (Landman, 2008: 10). Then, it is essential to explain “why is this so?” by giving evidences through scientific analysis.

9 COMPARATIVE RESEARCH METHODS/TOOLS/TECHNIQUES

Quantitative, qualitative, and mixed methods have been extensively used in value-laden scholarship (Battaglio & Hall, 2018). In CPA research, we can test our hypotheses or build theories with either qualitative or quantitative data, measurement, and analysis. Therefore, there are particular analysis techniques in these studies to analyze collected data to provide empirical explanations for theoretical hypotheses whether they are supported or not. On the other hand, qualitative studies have alternative measurements and explanations methods (Neuman, 2014: 203). In both qualitative and quantitative studies, we are looking for relations between data and assumptions, or concepts, namely cause-effect relationship between dependent and independent variables.

9.1 *Quantitative Methods*

Quantitative methods as named as a variable oriented by Ragin (2014) aim to show differences in number, whereas qualitative methods try to show differences in kind (Landman, 2008: 20). In quantitative studies, we have tendency to start our research with assumptions and ideas, but end with empirical findings based on data analysis, while we mix data and ideas in the process of collecting data in qualitative studies (Neuman, 2014: 205). Quantitative methods can be simple and advanced statistical methods based on the distribution of quantitative data (such as protest events, democratic transitions, and growth rates) and the relationships between various numeric variables based on theories and hypothesis (Landman, 2008: 20–21). In order to make quantitative analysis, the researcher requires to collect his/her own quantitative data for the compared cases and then analyze it to reveal the data. Quantitative methods are mostly known as statistical methods, parametric and nonparametric test, most commonly used ones are t and z tests, Chi-square,

multiple regressions, time series, frontier analysis, game theories, decision techniques, ANOVA, network analysis, etc. Therefore, quantitative scientific works with quantitative data include many charts, statistical results, research models, tables, and graphs that are full of numbers, because the data in these items helps readers to see condensed picture of the data and evidences related to the relations between dependent and independent variables (Neuman, 2014: 393). In the new millennium with the advancement of artificial intelligence and big data, there are other quantitative methods, algorithms, and ways to do quantitative analysis other than statistical methods.

9.1.1 Experimental Approach

Different from other social research techniques, experimental research is a positivist approach that is borrowed from natural sciences known as best and the strongest tests of causal relationships (Neuman, 2014: 282). The experimental research method is a quantitative method intended to find out the causes of any factors. It is based on experiments to find out the causes of problems from hypotheses developed. For instance, we press turn on button on the laptop, but it does not respond. We firstly assume a simple hypothesis that “power cut” might be a cause, so we check cable connections of the laptop. By doing this, we modified/controlled one thing and compared the outcome whether the laptop is turned on. If it is not the reason, we check its battery whether it is appropriately plugged, because it might be another cause. After we are sure that these two causes are not the reason, we assume that there is a third cause that needs to be modified. If we have enough technical knowledge, we can make electric circuit analysis by opening the laptop’s panel. If not, we apply to an expert to find out the real cause behind this problem. CPA research is similar, because we assume hypotheses about the causes for an administrative problems. Therefore, we look for causal relations between dependent and independent variables. If our possible causes do not have relations with our case, we check existing empirical studies and theories to find out possible causes for similar cases in the literature, and apply these new causes to our case comparatively. In public administration instead of experiment, we sometimes use quasi experimental designs such as interrupted time-series analysis to seek intervention at a defined point in time (Önder, 2011b).

9.1.2 Models with Behavioral Focus

Behaviorism is an approach in psychology that was developed by American James B. Watson (1878–1958) and improved by B. F. Skinner (1904–1990) (Neuman, 2014: 284). This approach contributes to the development of experimental studies. Behavioral models are concerned with the behavioral perspective of individuals in the administrations. These models aim to identify the patterns of individual behavior such as personality, motivation, corruption, and leadership and try to understand the causes of these behavioral patterns. These models benefit from the outcomes of psychological studies

which seek to find answers to why people behave in such a way (Jreisat, 2011: 104). Behavioral approach is important for CPA research, because they combine public administration and psychology. For instance, Riccucci et al. (2014) found empirical evidences that gender representation influences the perceived job performance, trustworthiness, and fairness of the agency by using online survey experiment that is applied to randomly elected 789 police officers in a police department's domestic violence unit. Therefore, they were able to analyze the theory of representative bureaucracy, also known as theory of symbolic representation to find out how citizens judge performance, trustworthiness, and fairness of police department.

9.2 *Qualitative Methods*

Qualitative methods are generally known as employing inductive process of theorizing to produce different types of theoretical contribution that include theory building, theory elaboration, or theory testing while using and maintaining the richness of qualitative data (Ashworth et al., 2019: 320). Qualitative research approach as a case oriented is when less number of cases (Ragin, 2014) provides in-depth understanding of fundamental explanations, reasons, and motivations (Önder, 2013). This type of research gives intuitions to the problem, provides solutions to make up notion, and make assumptions for possible quantitative study (Önder & Nyadera, 2022). Qualitative methods such as macro-historical comparison and in-depth interviews seek to understand attributes, characteristics, and traits of the certain objects (Landman, 2008: 20–21). These methods give in-depth insights about complex political phenomena without making generalizations, whereas quantitative methods allow for generalization across a large number of political phenomena without in-depth insights (Biesenbender & Héritier, 2014: 238).

In CPA, researchers collect qualitative data to understand factors related to events (political, economic, social, or administrative), people (e.g., politicians, bureaucrats, and public officials), and their actions in social, economic, and political life. In this way, qualitative data is collected from “documents, observational notes, open-ended interview transcripts, physical artifacts, audio or videotapes, and images or photos”, but analyzing qualitative data is tentative and incomplete (Neuman, 2014: 477). Compared to quantitative analysis methods that benefit from advanced mathematics and sophisticated computer programs to analyze specialized, systematic, standardized, and explicit data, qualitative analysis applies non-statistical methods, but new qualitative softwares enable qualitative researchers to do better analysis. Recently, qualitative researchers have started to benefit from sophisticated computer programs that are developed for qualitative data analysis. There are even researchers using qualitative and quantitative methods (mixed methods) together in order to benefit from advantages of both methods.

9.3 *Mixed Methods*

Battaglio and Hall (2018) found that mixed/hybrid/combined methods research is being increasingly becoming more popular among CPA scholars. Mixed method is a design and process of research based on the combination of both quantitative and qualitative methods for data collection and analysis through selecting, sequencing, and connecting (Honig, 2019: 300; Mele & Belardinelli, 2019: 335). These methods combine both qualitative and quantitative approaches. In this context, mixed methods aim to decrease the weaknesses of these two approaches and seek to ensure generalizability of the results while identifying the causal mechanisms. Scientific analysis with these methods provides integrated analysis of the causes and conditions for certain empirical phenomena through combining qualitative case studies with quantitative techniques such as regression analysis (Biesenbender & Héritier, 2014: 238–243).

The advantage of mixed method approaches is that they provide a more holistic view of social science research by improving the interpretability of results, reducing bias, providing context, and validating measures and constructs to avoid the shortcomings of narrower individual designs (Hendren et al., 2018: 905). However, it is essential to keep in mind that mixed methods require more time and effort (Battaglio & Hall, 2018: 825). Moreover, there are only few researchers that are able to use mixed approach, because using both qualitative and quantitative approaches that have different logics for guiding the research process causes significant complexity (Köylü & Önder, 2017; Neuman, 2014: 17).

9.4 *Case Studies*

Case study is the most common method of research in comparative politics and public administration (Peters, 1998: 137). The case study method is defined as “an in-depth investigation of (contemporary) phenomena in a real-life context, particularly equipped to answer how and why questions” (Blatter & Haverland, 2014: 59). The case-oriented (Ragin, 2014) study method has some advantages over other statistical research tools such as (1) providing details, complexity, and multiple causation rather than focusing on few variables; (2) locating results in particular historical and cultural settings rather than isolating findings from their surroundings; and (3) looking at the sequence of events and processes rather than looking at just outcomes (Peters, 1998: 141). Case study focuses on both the context and the variables at the same time. Therefore, this type of study enables researchers to study complex phenomena and their context intensively (Barzelay, 2007).

The case study is outcome oriented, because it focuses on many and complex causes of a specific outcome (Y) rather than focusing on the effects of a specific cause (X) (Blatter & Haverland, 2014: 59). In addition, case studies can be constructed for a variety of purposes depending on the type of

the case such as (1) collecting information about the topic in question, event, or decision; (2) demonstrating how politics or processes in a country or set of countries actually work; (3) teaching through the use of cases in business schools or other schools; and (4) testing and elaborating theory (Peters, 1998: 147–148).

The case study method is mostly used approach in CPA research. Neuman (2014: 42) suggests that a case study includes some elements such as doing a qualitative study by benefiting from several sources of evidence, analyzing properties of a phenomena by means of a selected case, and gaining knowledge about a wider universe of similar units. Case study is a way in which empirical social research is carried out when a phenomenon is investigated within its real-life context, where boundaries between a phenomenon and a context are not clearly defined in a situation, and where multiple sources of evidence are used. In a case study, the emphasis is given to provide a complete and detailed description as well as an understanding of the relationship between the factors involved in each situation, irrespective of the numbers involved.

Guerra et al., (2013: 274) argue that a case study method is nothing more than a restricted definition of a qualitative research method. Moreover, this type of study basically uses an inductive method implying the inherent intellectual approach of examining the particulars prior to reaching a generalization (Singh & Singh, 1964: 18–19).

It gives some account of numerous personal, institutional, psychological and legal factors that surround the decision- making process and seek to portray ‘slices of life’ accurately, deeply and with a degree of homely detail. They provide photogenic presentations of the complex administrative situation and the readers feel a sense of participation in them. A realistic picture of administrative complexities is presented in an intimate and graphic way and the readers get an awareness of how the administrative system operates.

9.5 *Boolean Analysis and Process Tracing*

Dodds (2013) offers two more alternative approaches: combinatorial analysis and process tracing. Firstly, combinatorial analysis is also known as “Boolean analysis” that is developed by George Boole and then applied into qualitative studies by Charles Ragin qualitative comparative analysis. This approach is based on the selection of factor between dichotomous variables that explain a particular value on the dependent variable. Dodds (2013: 322) claims that the logic behind this approach is that a group of independent variables might have combinational influence (combinatorial logic) on a particular outcome, rather than assuming that only one independent variable has influence on this particular outcome (Ragin, 1987: 15). Recently, there are advanced computer packages making statistical calculations to find out the most relevant independent variables from a large number of variables that are assumed to have influence on a particular outcome to occur. For instance, there might be many

causes of corruption in a country such as lack of political control, low level of education, political culture, lack of economic freedom and accountability, political instability, and ethnic diversity/in group favoritism, so researchers can add the values of these variables in statistical calculations to find out the most relevant independent variables as causes of corruption. Farah et al. (2018), as an example, compare developing countries by focusing on the case of Ethiopia. In this study, they analyze how foreign aid (ODA-Official Development Assistance) influences the level of corruption in these countries by analyzing the influence of ODA on corruption in Ethiopia which has been receiving tremendous amount of foreign aid compared to other African countries. They found that ODA has no influence on corruption in the case of Ethiopia, so other factors that might have influenced should be analyzed as well (Farah et al., 2018: 30–31). Secondly, process tracing is the second alternative approach that “attempts direct examination of the causal process linking independent to dependent variables – possibly via intervening and/or confounding variables”, instead of looking at the combinational influence of independent variables on a particular outcome (Dodds, 2013: 323). As an example, Skocpol (1979: 170–171) analyzes social movements, and she finds out that an ideologically motivated vanguard movement is always an important factor directing the revolutionary change although it is not the starter of the revolution.

10 METHODODOLOGICAL CHALLENGES IN COMPARATIVE RESEARCH

Once a researcher determines approach, theory, and methodology for a comparative research, he/she should consider some challenges. Therefore, this part covers some of major problems that researchers face in CPA research: (1) case selection, (2) construct equivalence, (3) many variables or small number of cases, (4) causality, (5) value bias, (6) the influence of transnational factors, and (7) availability of data (Dodds, 2013; Fitzpatrick et al., 2011; Mills et al., 2006; Pollitt, 2011).

10.1 Case Selection

Case selection is one of the most significant stages concerning comparative research that needs to be done very carefully. Case selection is generally theory-driven and deliberate, but there can be irrelevant cases that significantly affect the results (Mills et al., 2006: 621–622). The problem of selection bias arises if the researcher intentionally selects certain cases that favor the particular theoretical position and violate scientific principle of random sampling (Landman, 2008: 36). Hence, it is crucial to decide which cases to include and which ones to exclude. Additionally, the researcher should decide the scale of the analysis by choosing small or relatively large sample size. For instance, choosing many cases (like countries) with general comparative variables can result in superficial but statistically sound results. On the other hand, choosing

few cases with many comparative variables can restrain effective testing for causal models (Mills et al., 2006: 622). Thus, the scale of analysis is critical for comparative research.

The researcher should decide the level of analysis by studying macro- or micro-phenomena. Studying the effects of macro-aspects of countries such as GDP and levels of inequality is different from studying the effects of micro-aspects such as education and individual behavior. For instance, ecological and individual fallacies appear when the researcher makes inferences about one level of analysis using evidence from another. This is because individual data comprises information on individual people, whereas ecological data comprises aggregate information about territorial units, municipalities, counties, states, and countries. Therefore, it is very important to use individual data for studies having individual-level research questions and to use aggregate data for studies having research questions specifying systematic relationships (Landman, 2008: 41–45).

10.2 *Construct Equivalence*

“Equivalence” is a very common issue, because it is not certain whether a factor in one country means the same thing in another. This challenge mainly refers to “the reliability of indicators used to operationalize a concept in different national – or, indeed, regional – contexts” (Dodds, 2013: 329). As an example, elections are legal processes, but we cannot say that elections in Iran are legitimate due to restrictions for parties or candidates to freely attend the elections. In addition, the concept of “race” in North America is quite different from Latin American’s use of the same concept. Therefore, it is crucial to have equivalent instruments or definitions for measurement in order to examine the similarity and differences in different cases while making cross-national and cross-cultural comparisons. This is because, different understanding of a concept can cause different measures for that concept (Mills et al., 2006: 622–623).

Defining key concepts is difficult in comparative research due to construct equivalence, which means making sure the constructs and terms used in the research have the same meanings across different social settings (Fitzpatrick et al., 2011: 827). So, how do we know whether any construct/concept/phenomenon, which apparently goes under the same label, is actually the same thing in different countries? For example, perception of “corruption has negative meanings for some people, but might be acceptable behavior or even proper and obligatory behavior for others” (Peters, 1994). Therefore, CPA researchers need to desist from establishing and estimating inferential models from comparative data without considering the possibility of measurement nonequivalence, because this can result in spurious results and misleading conclusions. Measurement nonequivalence can be from a variety of sources or different aspects of biases such as construct bias, method bias, and item bias (Jilke et al., 2015: 37–46). For instance, method bias

includes (1) the incomparability of national samples, (2) cross-cultural differences in response behavior, and (3) systematic differences across countries in the survey communication between interviewer and interviewee. Therefore, respondents from certain cultures might have a tendency to select the extreme point of a given item scale (Johnson et al., 2005). In this case, these respondents from different countries may share the same scale points but not the same meaning attached to it. This could lead to a change in the mean value. In order to avoid measurement nonequivalence, Jilke et al. (2015: 39) recommend two procedures to detect and deal with measurement nonequivalence: (1) multiple-group confirmatory factor analysis and (2) multilevel mixture item response theory modeling. The former refers to “the equivalence of individual items and subsequently establishes different levels of measurement equivalence, including nonequivalence and partial equivalence, in an iterative process”, while the latter means a “model with item bias effects that is applied in the later part of this study tests and corrects for measurement nonequivalence within a single model” (Jilke et al., 2015: 39). For example, Dodds (2013: 331) suggests that including internal researchers or external contributors like translators from other languages and cultures in the research team is very beneficial to overcome linguistic challenges, because the notion of a word like “agency” in Hong Kong might differ from the word “public organization” in Italy. Reference ‘Jilke et al. (2015)’ is cited in the text but not provided in the reference list. Please provide the respective reference in the list or delete this citation. We added this citation in the reference list.

10.3 *Many Variables or Small Number of Cases*

Case-oriented approach aims to fully understand one or only few cases by using many variables, while variable-oriented approach aims to get statistical explanation of a differentiation in many cases with only few variables (Mills et al., 2006: 623). It is essential that using many variables or analysis of small number of cases is a main methodological problem for comparative studies (Lijphart, 1971). Thus, it is important to choose carefully between two approaches for the research question being concerned: a variable-oriented statistical model or case-oriented approach? There are some methodological problems in CPA research. Firstly, if there are too many variables (unknowns, inferences, or possible explanations) and not enough cases (observations or countries), then solving for the unknown becomes problematic in comparative research (Landman, 2008: 31). Secondly, finding relevant cases helps researchers to limit framework of their studies, whereas practical troubles emerge if the researcher compares dissimilar societies. Thirdly, the researcher might have measurement problem due to lack of experimental control for small number of cases. For instance, explanatory statements can hardly be made, if there is missing data for some of the countries that are compared. Therefore, empirical constraints are important to reach generalizations in CPA research. Ragin (1987) also assumes that the small number of cases might

let researcher to set up statistical control over circumstances. On the other hand, Lijphart (1971) argues that empirical constraints such as scarcity of time, energy, financial sources, and doing intensive analysis for only few cases cause problem in testing “macro hypothesis” for structural elements, because these constraints decrease the number of the cases. Lastly, Dodds (2013: 337) argues that researchers have tendency to include only developed countries in their comparative analysis, and they consider cases with extreme values which have low as well as high values on the dependent variable. However, Collier et al. (2004: 88) focus on cases with extreme values on dependent variable that causes the risk of “causal heterogeneity”, which means that the researcher requires more complex research models due to increasing number of possible independent variables.

Lijphart (1971: 686–691) recommends four solutions for minimizing many variables and small number of case problems. Firstly, we need to increase number of the cases. For instance, if a researcher compares only two countries, it is beneficial to add one or more countries depending on the accessible and measurable quantitative data. Collier (1993) suggests that increasing the number of cases is worth of efforts to reach more reliable and valid studies. Secondly, we need to decrease the “property space” of our comparative analysis, because if we cannot increase the number of the cases, it might be easier “to combine two or more variables that express an essentially similar underlying characteristic into a single variable” (Lijphart, 1971: 687). For instance, factor analysis is a widely used method which helps researchers to reduce the number of variables (factors) by measurement processes into a smaller set (Tabachnick & Fidell, 2001). Thirdly, it is important to focus on comparable cases that have a large number of similar characteristics (variables) as constants. By determining the variables that are constant, the researcher can reduce the number of variables for the comparative analysis, so he/she can avoid the problem of “many variables”. The last solution that Lijphart (1971) proposes is focusing on the “key variables” in CPA research, because the researcher should avoid “the danger of being overwhelmed by large number of variables and, losing the possibility of discovering controlled relationships” (Lijphart, 1971: 690). Therefore, the researcher might focus on only key variables that have marginal importance compared to other variables.

10.4 *Causality*

Causal explanation refers to a cause-effect relationship between concepts or variables. We can find the evidences of causality in empirical world, because it exists “out there” as an objective reality. On the other hand, some others argue that causality is a mental construction, because it was created by subjective thinking to explain causal relationships between events (Neuman, 2014: 74). Therefore, it is essential to find out real causes (independent variables) and their effects on the events/things (dependent variables) in a CPA research. Ragin (1997) argues that there are no universal standards between dependent

and independent variables in quantitative analysis. Firstly, he says that we need to be careful about analytical separation of dependent and independent variables, because independent variables should not always be taken as linear and additive net effects. A group of independent variables might have a combination of causal effects on a dependent variable, rather than on independent variable having particular outcome. For instance, stress cannot be the only reason for failure of a student, and it can even increase the success by motivating the student. However, we need to be aware that there might be a group of independent variables having a complex interaction on student's success such as stress, family income, characteristics, time management, and access to educational tools. Secondly, as an example, Ragin (1997) recommends that identifying the shared causal conditions and commonalities of relevant countries is the first step in the qualitative analysis of anti-neocolonial revolutions, because these countries have mostly high levels of foreign capital penetration. In other words, the foreign capital penetration causes mostly the same outcome in countries with similar conditions. Similarly, Mills et al. (2006) tell that more interpretive approach uses causal combinations for estimating complex interactions instead of using linear-additive models. Therefore, it is important to decide which approach to causality should be adopted while making comparative research (Mills et al, 2006: 623–624).

10.5 *Value Bias*

Value bias appears when particular cultural, political, and philosophical tendency of the researcher causes the bias on the results (Landman, 2008: 45). Analysis of the situation and interpretation of the results can be subject to the researcher's perspective and attitudes. Hence, it is important to separate facts and values. Landman (2008: 45) argues that "the key to making valid comparisons is to be as public as possible in terms of the judgments that have been made in the overall construction of the comparative study". Therefore, it is important to avoid from a biased view on an issue, because it causes restrictions of a study. Multiple observers, co-authors, theorists, and practitioners in a study can reduce these restrictions, because each of them has "alternative perspectives, backgrounds, and social characteristics" that limits value bias (Neuman, 2014: 167). Moreover, it is very rare that one scholar is expert in all matters in theory and practice, so group work including theorists, practitioners, and others can combine different knowledge and experience in that study (Önder et al., 2019).

10.6 *The Influence of Transnational Factors*

This challenge is also known as Galton problem, which points out the increasing impact of transnational factors on domestic policy-making of different societies and polities. This issue highlights the question of how using individual countries, regions, or any other geographically-defined units

as building blocks is appropriate for a CPA research (Dodds, 2013: 325). As an example, pollution and climate change are international issues that go beyond national borders, because these issues influence many countries due to their interdependencies. Dodds (2013: 326) assumes that considering developed countries that have strict environmental policies, a researcher might think that it is because of domestic factors in these countries such as increasing strength of environmental movements or environmental scandals. However, the researcher might fail to consider influence of international actors (e.g., Greenpeace, EU, OECD, UN, and WHO) and international public opinion (increasing awareness on environmental protection) that enforces strong control of environmental policies. Therefore, the CPA researchers require considering transnational factors that have influence on the dependent variable that is addressed.

This issue brings us to globalization which sees the world as one single case due to political, social, and economic transformation of different countries into the same direction. However, we should still think that some countries are more resistive than others to international influences due to some reasons such as selective adoption, cultural resistance, and non-preparation to innovation. Therefore, globalization does not occur in all countries simultaneously. Some countries partly accept global factors such as market economy and capitalist production, while refusing cultural formations due to strong resistance of traditional societies. Considering these challenges, the researcher can apply process tracing approach by analyzing partial and periodical influence of international and domestic factors over time. As an example, Caramani (2009: 23) suggests that large-N time-series analyses can help researchers to find out when international or domestic factors caused a change.

10.7 *The Availability of Data*

The availability, absence, or unreliability of data from different countries is one of the main concerns in comparative research (Pollitt, 2011: 122). Without data, it is not possible to compare two or more cases efficiently in a CPA study. Researchers might have tendency to study particular cases that have available data, so they “end up asking questions dictated by methods or by data availability, not by their theoretical, substantive, or historical interests” (Ragin, 1997: 29). Considering the fact that developed countries provide more data compared to developing or under-developed countries where available data is limited, it is hard to compare these countries. For instance, if there is no available data for “corruption” for one case while there is available data for other cases, the causes of corruption in this particular case cannot be measured, so it cannot be compared with other cases. Similarly, Neuman (2014: 390) claims that measurement is essential to answer questions that we address, but the lack of accessible data might restrict an effective measurement. Otenyo and Lind (2006: 12) also claim that availability of data series is essential to test previously untested question, and it can facilitate theory

building. Lastly, Sigelman (1976) argues that the number of researchers doing cross-national analysis is limited, so the comparative literature is limited, scattered, and diffused due to inaccessibility of data. He adds that micro-level research is non-cumulative because “Different scholars with different research perspectives use different instruments to interview different types of bureaucrats in examinations of different problems in different nations” (Sigelman, 1976: 623). Therefore, many scholars assume that an institutionalized mechanism that provides data series and maintenance for researchers is required, because this mechanism can facilitate available data for cross-national analysis at macro-level (Otenyo & Lind, 2006; Sigelman, 1976). For instance, OECD provides data and analysis, exchange of theoretical and practical experiences, advice on public policies, and international standard setting about its 37 member countries in 2021, and this data is very essential for comparative studies. The organization provides detailed data on twelve main topics with many sub-topics: agriculture, development (official development assistance, etc.), economy (GDP, productivity, etc.), education (youth and the labor market, etc.), energy, environment, finance (insurance and interest rates, etc.), government, health, jobs (wages and unemployment, etc.), society (demography and inequality, etc.), and innovation and technology (entrepreneurship, research and development, etc.).

11 CONCLUSION

All social sciences use some sort of comparisons in scientific studies. CPA as an interdisciplinary field, conceptually and methodologically, benefits from other academic fields. Methodological pluralism is also inevitable because of the interdisciplinary nature of CPA research as a subfield of public administration. Good research questions, good theory, good methodology, good data, good measurement, and good analysis all matter for advancement of the knowledge in any academic field and public administration scholarship. Both quantitative and qualitative research methods are used for testing current theories, building new theories, and doing in-depth analysis. CPA scholars can benefit from different approaches, methods, and techniques to better understand myriads of problems and questions in their fields. However, comparative methodology seems not to be used properly, and systematic knowledge creations are not sufficient enough in doing research in CPA field.

In this book chapter, we, therefore, discussed how to do theoretical and empirical research in CPA. In this regard, we firstly explained and defined the area of CPA as a field of public administration. Secondly, we examined the trends in CPA research and then evaluated comparative research by defining possible CPA approaches: the logic of comparison, the most similar and different systems design, systems theory (functionalist and institutionalist approaches), and Boolean analysis and process tracing. Thirdly, we pointed out the contextuality of CPA research through explaining social context (the relations between culture and administration), political context

(political culture and forms of government), and integral operating system. Fourthly, we focused on methodology that is very significant for a scientific study in CPA as well as other fields. In this sense, we explained level of analysis and unit of analysis (region, area, global comparison, bureaucracy, and organization). After that, we explained how to measure collected data and then interpret it by information types such as descriptive information, explanatory and analytical information, and prescriptive and normative information. While doing this, we also discussed how we can determine research question, test hypotheses, and make prediction and explanation. As a result, we explored comparative research methods, tools, and techniques such as quantitative methods (experimental approach and models with behavioral focus), qualitative methods like macro-historical comparison and in-depth interviews, mixed methods, and case study. Finally, we examined methodological problems and challenges in CPA research: case selection, construct equivalence, many variables of small number of cases, causality, value bias, the influence of transnational, and the availability of data.

We assume that comparative methods and approaches, quantitative and non-qualitative data, measurement and analysis techniques, and suggestions to overcome challenges can help researchers to increase scientific and methodological power of their studies. Focusing on theory building and generalizability of findings unfortunately disregards the unique situations in different countries ostensibly assuming that situations and events are context free. The social, cultural, political, religious, and other institutional backgrounds of non-Western countries have largely been ignored by Western researchers due to some reasons such as availability of data, value bias, and research capacity. However, it is necessary to make comparisons of the countries that are previously ignored in CPA studies, because it is the only way to produce comprehensive and objective theoretical and practical results that are beneficial for policy makers and researchers all over the world.

We are aware of the fact that there are some challenges and problems to make such a research; however, we also recommend theoretical and practical solutions to overcome these issues. For instance, we suggest that an institutionalized mechanism providing data series and maintenance for researchers can overcome the challenge of lack of available data for all countries, because this mechanism can facilitate available data for cross-national analysis at macro-level. Similarly, it is necessary to include theorists, practitioners, and others in a CPA research, because it is very rare that one scholar is expert in all matters in theory and practice. By doing this, the challenges like value bias, linguistic differences (someone in the group speaking language of the country that is compared), and equivalence can be overcome.

Public administration and CPA function in different times and face different challenges, requiring new concepts and methods that would include the global world. Therefore, CPA needs new insights and fresh empirical information to be revitalized and equipped to face realities of the twenty-first century. To

advance CPA research, contextuality, cooperation with multicultural perspectives, and bigger and better datasets should be maintained. Thanks to new computer technologies, big data and artificial intelligence algorithms have made a huge paradigm shift in use of data precisely and but less costly. It made it possible not only to reach data but also to do comprehensive quantitative, qualitative, and mixed analysis. With new improved methodologies, the new millennium will usher in a new era of research methods in all sciences, as well as comparative research.

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Selected Country Case Studies



The United Kingdom

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I INTRODUCTION

The state that reached the largest lands in the world's history was the Great Britain Empire, which was called the “Empire on which the sun never sets” on the Victoria I (1837–1901). Ruling over an area of almost 37 million square kilometers is not a feat that can only be achieved by military force. The underlying factor of this success is management power. The UK of Great Britain and Northern Ireland, which took its ultimate form in 1922, set an example for the administrative structure of many states with its rooted history and its administrative structure, which is tightly connected to traditions but open to development. Due to its structure open to improvement, some of the very important ideologies and paradigms used in politics and public administration emerged in the UK.

UK has played a leading role in developing parliamentary democracy and influenced world politics throughout the history from the end of nineteenth century to the beginning of twentieth century. It is claimed that UK has the most imitated administrative system in the world (Guler, 171). The UK citizens owe their loyalty to the Crown rather than to a constitution. The Crown represents more than the monarchy or even Her Majesty's government; it

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symbolizes the ceremonial side of the British state. In addition, it represents the rules as well as the sovereignty to enforce and administer these rules and to defend the country's borders (O'neil et al., 2010: 33).

UK has a long political and administrative history which resulted in strong traditional practices. The public administration practices of the UK have always been considered by many countries and have been used as an implementation model. In this context, central government, local governments, public personnel system, NGOs, and public administration reforms of the UK have been identified in this study within the framework of historical background and parliamentary system as worthy issues to be analyzed for the understanding of the UK public administrative system.

2 ADMINISTRATIVE HISTORY

2.1 *Roots and Development of Administrative Tradition*

The administration history of the UK contains many important historical events such as Magna Carta, the emergence of parliament, democratization of parliament, prime minister, and cabinet. Thus, it is important to know about the history of the UK in order to understand fully its administrative system. As it is well argued that any countries distinct historical experience on the origin, evolution, and development of public administration institutions (Islam, 2019; Islam, 2020, 2021; Islam, Bingöl, & Nyadera, 2020; Islam & Cansu, 2020; Islam & Hossain, 2020; Islam, Önder, & Nyadera, 2020; Islam et al., 2021) played an important role to understand its administrative system (Nyadera & Islam, 2020).

Monarchy is the oldest institution in England, it dates back to ninth century. The King of Mercia, Offa declared himself King of England in 774. In 829, Wessex king Egbert seized power in England. In fact, in the ninth century, because of the increase of Viking raids in England and the Vikings settling in this geography, scattered small regions felt the need to gather under a kingdom. By securing Wessex, the Anglo-Saxon Alfred the Great dominated west Mercia and received the title of "King of the British" (Cannon & Griffiths, 1988). However, since it ensured political unity and established a truly unitary state, the beginning of the kingdom in England was with Athelstan. After the monarchs ruled the country alone for long time, power which located at the hands of nobles had shifted toward to an elected parliament. The breaking point in this issue was started with Magna Carta in 1215 (Black, 2018). Although Magna Carta regarded as the first statement of citizen rights in the world, it did not include democratic principles or freedom in the sense we think today. In fact, Barons and high-ranking church officials wanted to stop the violation of the rights and laws by the king. In this sense, Magna Carta can be considered as one of the biggest steps in the name of liberty and law. It is also symbolizes the first step of limitations which applied to a powerful monarch (Roskin, 2011).

Second important step of the administrative history of UK is the establishment of parliament. Similar to the fact that Magna Carta did not contain democratic principles, the first form of parliament did not have the current duties and powers. Along with Magna Carta, the British kings began to invite 2 knights from every county and 2 burgesses from every boroughs to the London to talk about the affairs of the regions (Eroğul, 2012). However, it is very difficult to characterize this structure as a parliament. The founder of the “Model Parliament” was King Edward (I) and it is announced in 1295 which is accepted as the first representative assembly. In England, the approval of the parliament is needed to tax the subjects and so, then as now, central to the exercise of power was the ability to raise funds unlike the absolute monarchs of other parts of Europe (Darlington, 2020). Even though the parliament began as an extension of the king’s palace meeting, and in the process, the knights and town residents, the lower council, constituted the House of Commons. Also, the two chamber models of the UK Parliament—Commons and Lords—emerged in 1341. The members of the upper-level church and the members of the noble class generated the House of Lords.

After the legal basis and necessary institutions are provided, it is seen that the democratization efforts in the administration have started. The transition from a deep-rooted monarchy to democracy in the UK took place in 1688 with the Glorious Revolution. With this bloodless revolution, the parliament dethroned King James II. Instead of James, the parliament invited his protestant sister Mary and Dutchman husband William to become queen and king of England (Roskin, 2011). With the Glorious Revolution in 1688, House of Commons started to gain more power against House of Lords. House of Commons became an institution that can legitimize a sovereignty; thus, it increased its effects in British politics. The Bill of Rights of 1689 specified limits on the authority of the Crown and established the rights of parliament and rules for freedom of speech in parliament, the need for regular elections to parliament, and the right of petition to the monarch (Darlington, 2020). As a result of the Bill of Rights, the British administration system has transformed from absolute monarchy to constitutional monarchy.

After Queen Anne’s death, George I is the first king of England from the Holland dynasty to come to the throne through Protestants in 1714. However, George I could not speak English. Also, during the kingdom, he moved in line with the interests of Hannover rather than England. The fact that he cannot speak English led to a very different situation. He delivered the executive authority to the head of the cabinet (the prime minister), which consists of ministers. The prime ministry gradually became institutionalized and developed into its present state. However, it lacked two important features in the present day: the prime minister could not get together with ministers because this authority belonged to the king, and the cabinet was not responsible for the parliament. Even though the parliamentary movements had a long history, it was only possible for democratic elements to be included in the system at the end of the eighteenth century. The Reform Act of 1832

abolished sixty low populated boroughs and increased the voting capacity from 400,000 to 600,000 citizens; however, this legislation—supported by the Whigs (forerunners of the liberals)—was only enacted after being against three times by the Tories (forerunners of the conservatives). Other reform acts followed after these signs of progress (Darlington, 2020). Political parties emerged during this period, and a two-party system, liberal and conservative, was implemented in the nineteenth century. However, those interested in politics were noble and rich people. However, after the American and French revolutions, the democratization process sped up, as in the cities, rural residents could get voting rights. The democratic system took its current form in 1918, when women also gained the right to vote (Roskin, 2011).

The colonial history of England has a great influence on its administrative roots and development. After the colonization that began with the establishment of Jamestown settlement in 1607, the first successful permanent colony in “Virginia,” the region is known as the “Old Empire.” With the growth of the British Empire in the nineteenth century and reaching its largest size in the 1920s, the UK controlled more than a quarter of the world’s land mass in Asia and Africa. In the late nineteenth century, larger colonial colonies in Canada, Australia, New Zealand, and South Africa began to become autonomous colonies and gained independence in all matters except foreign policy, defense, and trade. The territories known as the *Britain Colonies* were named “*England Dependent Territories*” in 1981 with the British Nationality Act. In 2002, these territories were named “British Overseas Territory” with the enactment of the British Overseas Territories Act. Today, it is known that Great Britain has fourteen overseas territories.

On the other hand, the geopolitical position of UK is also of great importance in terms of its historical and administrative development. Because UK became an island country, it was not subjected to Caesar, Philip II, Napoleon, and Hitler invasions. The fact that it is an island country has also enabled it to gain a different character from other European countries with its unique institutional structure. The geographical structure of UK also paved the way for early industrialization.

Many ideologies and public administration paradigms were born in the UK, as well as events that profoundly affected human societies and governments, such as the Magna Carta and the Industrial Revolution. For instance, most recently, New Public Administration (NPM), born in the 1980s and one of the most important megatrends in the public sector, emerged in the UK during the reign of Prime Minister Margaret Thatcher. However, this paradigm has made its impact felt not only in the UK and Anglo-American countries such as the USA, New Zealand, and Australia but also in many developed and developing countries (Ömürgönülşen, 2003).

2.2 *Emergence and Development of Bureaucracy in the UK*

The history shaped the political and administrative formation of the UK. The political system of the UK is almost unique in the world. It has a parliamentary monarchy. In this system, sovereignty belongs to the Crown as Head of State and Head of the Government and Ministers who govern in the name of her. There is a “partly written and wholly uncodified” constitution. Statute law, common law, and conventions govern the relationship between the state and the citizens (UN, 2006).

In classical political theory, which was coined by Montesquieu, there are three arms of the state: executive, legislative, and judiciary. In the USA, according to the constitution, there must be a strict division of powers of these three arms of the state. However, in the UK, all ministers in the government are members of the legislature and one individual, the Lord Chancellor, is actually a member of all three arms (Darlington, 2020).

3 LEGAL STRUCTURE OF UK

In the UK, the Anglo-Saxon Law (Common Law) system is adopted. In the UK, which has the Common Law tradition, there is no distinction between administrative and ordinary courts. However, this should not be considered as the absence of administrative law in the UK. Administrative law in England has developed significantly and continues to develop, especially with the emergence and increase of specialized courts (Avci, 2014). The “Administrative Tribunals,” which have the authority of judicial review of the administration, have been established since the 1960s. The “Tribunal” is not a court organized within the judicial organization. It is an institution that is independent of the administration which they supervise and the election of its members is similar to judges.

It is possible to make judicial review directly or indirectly on the decisions of the administration in UK. While direct remedies are “appeals” and “law of torts,” indirect remedies are “declaration,” “injunction,” and “prerogative orders.” Prerogative orders can be categorized into three groups. These are certiorari, prohibition, and mandamus (Sayhan, 1996). It is not possible to talk about the existence of a written constitutional text traditionally in UK. An unwritten constitution is used, which is fed by three sources: acts, jurisprudence, and constitutional conventions. Although the basic principle adopted in almost all states with a democratic system is the supremacy of the constitution, in the UK the principle of legislative unlimitedness of the parliament has been adopted as the opposite of this situation.

The understanding of the separation of powers also differs in the UK, which has its own administrative and political traditions. The principle of parliamentary sovereignty is the focal point of the separation of powers. Parliamentary sovereignty is a principle of the UK constitution. It makes parliament the supreme authority in the UK, which can create or end any law. The courts

cannot overrule their legislation, and no parliament can pass laws that future parliaments cannot change.

The system known as the Westminster model takes its name from the Westminster Palace, where the British Parliament is located. Parliament, in this model, has two chambers: House of Commons and House of Lords. The House of Commons is the most important institution about legislation. A bill requires approval from two houses (except for finance, in which the House of Lords cannot reject the Finance Bill that passed 3 readings in the House of Commons) and Royal assent from the Crown (Punnett, 1992). The House of Lords is the higher chamber, however, having less authority. Its crucial roles are to revise legislation and provide control on the government by monitoring its activities.

In February 2021, there are 800 members in the House of Lords. Conservatives have 262 seats and Labours have 180. Others are from Liberal Democrats and crossbenchers. Also, archbishops and bishops of the Church of England take seats in the House of Lords who are a small number (Darlington, 2020).

4 CENTRAL GOVERNMENT AND ITS INSTITUTIONS

Although the UK was established by a combination of four different countries, and each has its own political and administrative systems, UK has a unitary structure and is governed by a strong central government (Gönülaçar, 2010). One reason for this situation can be shown as the preservation of traditional structures of administrative institutions such as the Crown, Prime Minister, Privy Council, and Cabinet.

UK is a constitutional monarchy. It is a country governed by a king or a queen who accepts the advice of a parliament. It is also a parliamentary democracy because it is a country whose government is controlled by a parliament which has been elected by the people.

4.1 *Scope of Central Administration*

In the UK public administration system, there are twenty-three ministerial departments, twenty non-ministerial departments such as Charity Commission and National Archive and 409 other agencies and public bodies, 103 High Profile Groups as Office for Civil Society, 13 public corporations as BBC World Service, and three devolved administrations. Departments and their agencies are responsible for putting government policy into practice. Although some departments, like the Ministry of Defence, cover the whole of the UK, some of them do not because some aspects of government are devolved to Scotland, Wales, and Northern Ireland (Gov.Uk, 2021).

Agencies and other public institutions implement public policies given to them. The Director-General directs the resources given to the agency using a framework document, which are normally set out the guidelines by the Head

of the Ministry. Agencies run almost seventy-two percent of the civil servants in the central administration.

4.2 *Administrative Position of Head of State (Crown)*

According to Walter Bagehot, the Queen's rights should be defined as "to consult, support and warn." However, Crown is more important than this. According to Boyraz, "The Crown; The head of the executive, the inseparable part of the legislative, the head of the jurisdiction, the commander in chief of the armed forces, the supreme ruler of the Church of England (Anglican Church)" (Boyraz, 2013). Besides these rights, the Crown also has special powers in the political sphere, jurisdiction, and military sphere. Among the political powers of the queen are to suspend or convene the parliament, to approve bills from the parliament, to appoint the prime minister, and to Appoint or Dismiss Ministers. However, these powers have mostly become symbolic. Although Royal Amnesty was a jurisdiction used by the Crown to rescue those who were wrongfully convicted, it was last used to lift the sentence imposed upon Alan Turing after his death.

The Queen is in chief of the UK army. She has the authority to recruit officers and disperse the army. Although he delegates many of his powers to the experts of the relevant fields, the queen has important powers that she cannot delegate to any other person or institution, such as giving the medal of honor and forming the Noble class (Royal.Uk, 2020).

Briefly, duties of Queen can be summarized as follows (Parlak & Caner, 2020):

- Calling parliament meetings in case of emergency, distribution for election,
- Extension of parliamentary elections due to war or extraordinary circumstances,
- Reading the "Crown Discourse" by the queen every year,
- Approval of laws (the Royal Assent),
- Appointment of the prime minister,
- The given of new lord degrees at the House of Lords upon the request of the prime minister,
- The appointment of important state officials over government's proposal.

4.3 *Privy Council*

Privy Council is the first and old form of the cabinet. It comprises several advisors appointed by the king in the seventeenth century. The Privy Council is a body of those appointed to advise the King or Queen on administration. Although it had a serious power in the past, today it is an institution that deals with symbolic missions such as some educational issues and charities. The

Special Council plays an important role in the world of higher education and certain regulatory bodies covering various professions (Privy Council, 2020). Another important responsibility of the Privy Council is to act as a Judicial Council to provide a final Court of Appeal verdict on behalf of the UK on the Commonwealth of Nations and overseas territories of the Kingdom.

4.4 *Ministries and Cabinet*

In the UK, three different concepts are used for ministry: office, ministry, and department. Ministers are chosen from within parliament by the prime minister, mostly from the House of Commons and a few from the House of Lords. There are two types of ministers such as senior ministers and junior ministers. These ministers are divided into three different groups as Secretary of State, state minister, and state undersecretary. The number of all ministers is approximately 100. While for the government in this form it is called the Council of Minister, the cabinet is formed by the participation of the prime minister, secretaries of the state, the president of the House of Commons, the president of the House of Lords, and the head of the judiciary traditionally given cabinet membership (Durgun, 2012).

It is necessary to make a distinction between the cabinet and the Council of Ministers in the UK. If the executive organ considered as three interpenetrated circles, the outermost and largest one is the Privy Council with 300–400 members. There is Council of Ministers with 80–90 members within the Privy Council, and there is the cabinet with 15–20 members within the Council of Ministers.

The cabinet is made up of the senior members of government. Every week during parliament meetings, members of the cabinet (Secretaries of State from all departments and some other ministers) meet to discuss the most important issues for the government. Despite the perceived emphasis on the role of the PM, the cabinet nonetheless remains a core component of government (Gov.Uk, 2021). It can be said that in the Westminster model, the cabinet has power over the legislature and the executive, as all government units are led by a minister who is a member of parliament (Kam, 2009). Within the ministry, a distinction is made between ministers and management. Moreover, the existence of a general directorate for Covid-19 stands out as an example of management flexibility.

All of what is written above is about ministries that exist today and where similar ones can be seen in many states. However, there was one ministry in the UK that had not been established in any other state: the Colonial Office. Because of the expansion of the overseas territories of the UK, the Colonial Office was established in 1768 to both control those areas and provide services to the people living there (Kirk-Greene, 2012). However, the number of colonies that gained their independence after the Second World War increased, and the activities of this ministry were not needed. Hence, Colonial Office was removed in 1966.

In addition, the concept of the shadow cabinet has an important place in the UK administrative system. The shadow cabinet is basically a structure that is a special assignment of a parliamentarian, to monitor the activities of a ministry on behalf of the main opposition party or other parties that are candidates to come to power (parliament.uk, 2020). This parliamentarian examines all the actions of the ministry in charge, informs the parliament, and where necessary, appeals. In case the opposition party comes to power, these parliamentarians are usually appointed as the head of that ministry.

4.5 *Local Organization of Central Government*

There is no standard central provincial organization in the UK. Each ministry has an organization at the regional level, or at a lower level, known as decentralization. Ministries do not have a homogenous structure in terms of provincial organizations. From the early 1990 onward, it appears that governments have moved to form regional governments by uniting lower-level provincial units in the organization of public services. As a consequence, there are no homogeneous organizations in the UK at the provincial level. Even in the same service area, there are many organizations of different structure and level, and due to this situation, there are serious conflicts of authority.

4.6 *Independent Agencies*

Autonomous organizations in the British public organization first appeared in the present form after the 1880s. These organizations became widespread after the Second World War and especially after the 1960s when the management approach from the standpoint became prominent. The autonomous organizations' explosion in Britain took place in the 1980s after radical changes to the flexibility of public organizations. Uniform autonomous organizations cannot be mentioned in England. Quasi-government and quasi-autonomous are used concepts related to independent agencies. Also, the concept of quasi-autonomous non-governmental organizations is briefly used as a quango. In England, the concept of non-departmental public bodies (NDPB) is used for autonomous organizations that are not part of the ministry hierarchy. Thus, although they are financed and controlled by the center, it is claimed that the local service quangos were founded by Thatcher to weaken the power of local governments (Wollmann, 2012). Within the scope of the quango, there are 6700 autonomous organizations organized at local and national level in England.

4.7 *Financing*

HM treasury is responsible for formulating and implementing the government's financial and economic policies. It is also the Economy and Finance Ministry of the UK. The fiscal year in the UK runs from 6 April one year to

5 April the following year. Budgets are usually set once every year and are announced in the House of Commons by the Chancellor of the Exchequer.

According to Budget Report 2021 published by HM Treasury, total revenue of public sector is £820 billion. Income Tax has the largest share among public sector receipts (£198 billion). Value-Added Tax is the second largest resource of public sector receipts (£151 billion). The other resources of public sector current receipts are National Insurance Contributions, Excise Duties, Corporation Tax, Business Rate, Council Tax, and Other Non-Taxes. On the other hand, public sector spending is £1,053 billion. Social protection expenditure is £ 302 billion, and it constitutes the largest expense service. Besides social protection expenditures, the expenditures of personnel social service, health, education, transport, defense, industry, agriculture and employment, housing and environment, public order and safety, debt interest, and other services constitute public sector spending (HM Treasury Budget Report, 2021). The financial audit of the administration is carried out by the National Audit Office.

4.8 *The Ombudsman*

There are many public and private ombudsmen that have been incorporated in the UK Ombudsman Association in 1993 and became the British and Irish Ombudsman Association when membership was extended to include ombudsmen from the Republic of Ireland in 1994 (United Nations, 2006: 10). In 2000s, other ombudsman bureaus were established in British Overseas Territories. The Ombudsman Association is a specialized association for ombudsmen and complaint handlers, their staff, and others interested in finding advice on a complaint. Their decisions are only advisory.

5 LOCAL GOVERNMENTS

5.1 *Scope of Local Governments*

Local governments are one of the tools that provide public service delivery in certain geographic areas in the UK. Although the UK has both a unitary structure and no guarantees and support for local governments in its constitution, local governments are very strong and developed in the UK. There are three main reasons why local governments are so powerful and advanced in the UK. These reasons are:

1. It is related to the very old and long history of local governments and the tradition of governance that the UK has.
2. There is no provincial organization affiliated with the central administration in UK. Therefore, services such as education, health, and safety services provided by the central administration are provided by local governments (Karasu, 2004: 110).

3. Public participation in local governments is important for local democracy. In the UK, there is traditionally an intense public participation in local governments.

The duties and powers of local governments in the UK are regulated by acts enacted by the parliament. Although local governments derive their power from acts enacted by the parliament, they are not responsible to the parliament because they are directly elected by the local communities. Local authorities do not have the same roles and duties throughout the UK.

5.2 *Local Administrative Units*

5.2.1 *Historical Development*

Although it is known that local governments in the UK have a deep-rooted tradition that goes back to the Magna Carta Document 1215, the first act that commissioned local governments was enacted by Queen Elizabeth I in 1601. The Act for the Relief of the Poor determined the duties and powers of local governments in combating poverty (Bruce, 1973: 5).

During the early nineteenth century, local administrative units consisted of about ten thousand villages and small towns. However, the local governments in the UK have undergone many radical changes since 1835. With the Municipal Corporations Act of 1835, 178 directly elected Municipal Borough were established.

In 1888, significant advances were made on the way of decentralization with the Law on Local Governments in UK. With this Local Government Act, local governments gained a legal status, city councils started to be managed by the elected people, and the criteria for establishing a municipality began to be determined (Yamaç, 2014: 2). This was accompanied by the Local Government Act (1889) in Scotland. A special “London County” was created for London.

With Law on Local Government in 1894, the states were categorized as urban and rural settlements, and assemblies whose decision-making bodies were elected began to be established. Additionally, the new city of London was established by merging three settlements adjacent to London (Karasu, 2018: 151). In 1899, a special act was enacted regarding London and the first municipality (*The London County Council*) covering London. This local administration system survived until the 1960s.

In 1963, the Greater London Council was established, covering all the borders of London. The three-level local government organization established with these regulations continued until 1972. The first stage of the three-tier organization of local governments was the “provincial councils,” the “country borough councils,” and the “Greater London Council.” The second tier of local government consisted of “town municipalities,” “rural district councils,” and “Greater London district council.” Finally, the third tier of local government consisted of “parishes” (Karasu, 2009).

With the help of the reforms that are applied in 1974, metropolitan counties and non-metropolitan counties (or “Shire counties”) were created in all over the England instead of administrative countries. Since 1974, a two-stage local government model has been adopted. After that, they were divided into metropolitan districts and non-metropolitan districts. With the coming to power of the Thatcher government in 1979, many public institutions and even some areas which have private sector buyers were privatized (Caiden, 1991: 369). In 1985, the impact of “Thatcherism” led to re-organization of the local government structure of UK and Law on Local Government was enacted.

The status of the London boroughs and metropolitan districts changed in 1986. They absorbed the functions and some of the powers of the Metropolitan County Councils and the Greater London Council which were abolished. “The London Metropolis Municipality and the other six metropolitan municipalities were abolished on April 1, 1986, just as the local government law introduced in 1985, as well as their lack of efficiency and low cost, were ineffective” (Keskin, 216).

In 1994, Law on Local Government was enacted. In Scotland and Wales in 1996, instead of a two-stage system, a single-stage management system called “Region” was established. In 1996, a further kind of district was created, 46 unitary authorities, which combined the functions and status of county and district. During the 2000 reforms, the Greater London Council was re-established. These reforms were very important in shaping today’s local government structure of the UK. With the changes in 2009, the UK reached the current local government structure. In 2009, instead of seven county councils and thirty-seven district councils, nine unitary authorities were established.

The outcome of the May 2010 election is the “hung parliament” which means that no party by itself control a majority of the seats in parliament. David Cameron promised to reduce UK’s spiraling budget deficit by cutting back on public service spending and by transferring more power to local authorities. “Compared with the 1970s, it seems that the local government departments have moved away from the community that they have grown and represented. The electoral district assemblies, which have been on the agenda in recent times, are much debated and they further increase the distance of citizen local authority” (Keskin, 217).

5.2.2 *Administrative Structure of Local Governments*

There is no uniform local government structure in the UK, and the local government structure varies from region to region. In some regions, local government consists of two pairs: a country council (upper tier) and a district council (lower tier), and the responsibilities of both councils differentiate depending on the services they present. In other areas, there is only a single unitary authority. Although there are only unitary, single-tier councils in Scotland, Wales, and Northern Ireland, a two-tier local government structure is

Table 1 Types of local governments in the UK

<i>England (333 total)</i>	<i>Wales (22 total)</i>	<i>Scotland (32 total)</i>	<i>Northern Ireland (11 total)</i>
24 County Councils (upper tier)	22 Unitary authorities	32 Unitary authorities	11 Unitary authorities
181 District Councils (lower tier)	(unitary)	(unitary)	(unitary)
32 London Boroughs (unitary)			
36 Metropolitan Boroughs (unitary)			
58 Unitary authorities (unitary)			
2 Sui Generis authorities—City of London Corporation and Isles of Scilly (unitary)			

Source LGIU (2021) and GOV.UK (2021)

observed in some parts of England. There are 398 principal (unitary, upper, and second tier) councils in the UK—24 county councils, 181 district councils, and 201 unitary councils (LGIU, 2021) (Table 1).

In most of the England, public services are provided by two-part local governments, referred to as county council and district council. County councils cover the entire county area and perform many public services, from education to waste disposal. Within the county, there are 181 district councils that cover a smaller area and provide more local services such as housing, environmental health, and local tax collection. However, London, other metropolitan areas, and some parts of shire England operate under a single-tier council structure (LGIU, 2021).

There are 333 councils and five possible types of local authority in England. These are county councils, district councils, unitary authorities, London boroughs, and metropolitan districts. First, county councils cover the whole county and provide eighty percent of services in these areas, including children's services and adult social care. Second, district councils, which cover a smaller area within a county, providing more local services (such as housing, local planning, waste and leisure but not children's services, or adult social care), can be called district, borough, or city council. Third, unitary authorities which are just one level of local government responsible for all local services can be called a council (e.g., Medway Council), a city council (e.g., Nottingham City Council), or borough council (e.g., Reading Borough Council). There are 56 unitary authorities in England. Fourth, London boroughs have thirty-two boroughs and are unitary. In London, the London boroughs and the City of London offer the majority of their functions. The Greater London Authority (GLA) consists of a directly elected Mayor and a

separately elected Assembly. The GLA group consists of the following four functional groups: Mayor's Office for Policing and Crime, London Fire and Emergency Planning Authority, Transport for London, and GLA Land and Property. Fifth, metropolitan districts are a subdivision of a metropolitan county. These districts typically have populations of 174,000 to 1.1 million.

Local government in Scotland is organized through 32 unitary authorities created as councils which consist of councilors elected by registered voters in each of the council areas. Northern Ireland is divided into 11 districts for local government aims. In Northern Ireland, local administration councils do not carry out the same range of functions as those in the rest of the UK. For example, they have no responsibility and competence for education, road-building, or housing (although they do nominate members to the advisory Northern Ireland Housing Council).

Wales has since April 1, 1996, been divided into 22 single-tier principal areas (unitary authorities). The elected councils of these areas are responsible for the provision of all local government services, including education, social work, environmental protection, and most highways.

Combined Authorities

With the establishment of Greater Manchester in 2011, the councils established unified authorities in parts of the UK. These combined authorities receive additional authority and funding from the central government. They are particularly important to the transport and economic policy of their region. There are now nine combined authorities in the UK: Cambridgeshire and Peterborough, Greater Manchester Combined Authority, Liverpool City Region, Sheffield City Region, Tees Valley Combined Authority, West Midlands Combined Authority, West of England Combined Authority, North East Combined Authority, and West Yorkshire Combined Authority.

Town, Parish, and Community Councils

In some parts of England, Wales, and Scotland, there is another layer of local government below these councils called parish (England), town (England), or community (Wales and Scotland) councils. These are responsible for services such as management of town and village centers, litter, verges, cemeteries, parks, ponds, allotments, war memorials, and community halls. Scotland's Community Councils have fewer powers than their counterparts in England and Wales (LGIU, 2021).

Additionally, Parishes and Charter Trustees represent the third tier of local government, the most local level of government in England. In total, there are around 10,000 such councils in England, 730 in Wales and 1200 in Scotland. There are any parishes in Northern Ireland (LGIU, 2021).

5.2.3 *Organs of Local Authorities*

Councillors

Although electoral methods for councillors are not the same in the UK and differ from region to region, councillors are elected to represent local citizens for a fixed term of four years. They have to balance the needs and interests of residents, voters, political parties, and the councils. Local councils are made up of councillors (called members) who are voted for by the public in local elections and are supported by the permanent council staff (called officers). Councillors decide on the overall direction of policy and implement that those policies are responsible for delivering services on a daily basis.

Councillors work as full council, committees, and cabinet. The full council is made up of all elected councillors, usually belonging to a range of different political parties. The entire council debates and decides upon policy based on reports from the committees. Councillors on committees monitor and review the council's performance and decision-making process in order to ensure it is accountable to the public. Council officers provide information to the committees. A cabinet is like a council government, usually formed by the most represented political party in the full parliament. It is the only group allowed to decide on specific policy areas without the approval of the whole council. Each cabinet member usually deals with a specific area, e.g., environment, housing, and culture. Between 2000 and 2011, most councils had to have a model of "Leader and Cabinet" rather than a committee system. However, some of the councils have returned to a committee system, as the Localism Act 2011 allows them.

There were roughly 20,000 councillors in England. The latest figures show 1,277 in Scotland and 462 in Northern Ireland (LGIU, 2021).

Mayor

There is council sovereignty in local governments. The council performs the legislative and executive functions together. The mayor is elected from among the council members. The mayor is responsible for the whole activity of the council. The mayor's political neutrality is very important.

5.2.4 *Duties of Local Government*

In the UK, local governments provide a large number of public services compared to other European countries. The public services offered by local governments vary according to the characteristics of the current period. In the UK, which was dominated by the welfare state between 1945 and 1975, the duties undertaken by local authorities steadily expanded. The necessary funding to local governments was provided by the central government. With the Thatcher government coming to power in 1979, neo-liberal economic policies were adopted and privatizations increased. Many services offered by local governments, such as gas, electricity, and water, have been transferred to the private sector.

Table 2 Duties and responsibilities of local governments

	<i>Unitaries</i>	<i>County Councils</i>	<i>District Councils</i>	<i>Metropolitan Districts</i>	<i>London Boroughs</i>	<i>GLA</i>
Education	✓	✓		✓	✓	
Highways	✓	✓		✓	✓	✓
Transport Planning	✓	✓		✓	✓	✓
Passenger Transport	✓	✓				✓
Social Care	✓	✓	✓	✓	✓	
Housing	✓			✓	✓	
Libraries	✓	✓		✓	✓	
Leisure and Recreation	✓		✓	✓	✓	
Environmental Health	✓		✓	✓	✓	
Waste Collection	✓		✓	✓	✓	
Waste Disposal	✓	✓		✓	✓	
Planning Applications	✓		✓	✓	✓	
Strategic Planning	✓	✓		✓	✓	✓
Local Tax Collection	✓		✓	✓	✓	

Source LGIU (2021)

With the Law on Local Government enacted in 2011, local governments in England were given the “general authority” expressed as “the right to intervene and take action in relation to any local problem,” unless explicitly restricted by law. On the other hand, pursuant to the principle of “ultra vires,” local governments cannot fulfill any functions other than those assigned by law. The central government can determine the service scope and standards of local governments (Usta et al., 2017).

In Table 2, the functions performed by local governments according to administrative levels are given. As shown in the table, the duties and responsibilities of provincial councils in UK are quite wide.

On the other hand, fire and rescue and passenger transport are typically the responsibility of single purpose authorities, which usually share the same boundaries. Single purpose authorities also extend to National Parks and some waste disposal services. There is also a Police and Crime Commissioner for each constabulary which covers each metropolitan area and shire county.

5.2.5 Financial Structure of Local Government

Between 1945 and 1975, with the increase in duties undertaken by local governments, the finance of the services offered by local governments was

provided by the central government. However, since the 1980s, with neo-liberal policies, many public services offered by local governments have been transferred to the private sector and there has been a decrease in the expenditures of local governments. While local public expenditures accounted for 12.2% of national expenditures in 1975, this rate decreased continuously, and by 2000, it fell to 7%. After 2000, there was a slight increase in the rate of local public expenditures (Karasu, 2004).

Revenue Financing

Funding required by local governments across the UK is funded by a combination of central government grants and local taxes. Local governments generally have four different sources of income in the UK. These are council taxes, central government grants, business rates revenues, and council reserves. The balance between these financing sources differs from region to region.

In England, total income of local authorities is £ 167,676 million in 2018/19. 50% of funding of local governments came from central government grants, 31% from council tax, 18% from business rates revenue, and 1% from council reserves. In 2020, the government announced that it would abolish the central government grants for local government; in this way, local governments will only be financed through local rates of business and municipal taxes. The motive is to encourage local authorities to grow local economies and ensure that they are financially self-sufficient.

In Scotland, most of the local council financing is Scottish government's General Revenue Grant representing 58% of the total source of income. While business rate revenues correspond to 22% of the total income source of local governments, council taxes constitute 20% of the income source. In Wales, 67% of funding of local governments came from Welsh Government grants, 20% from council tax, and 13% from business rates revenues.

Local governments in Northern Ireland are funded differently. The financial revenues of local governments came from district rates (70%), which are a property tax like council tax, as well as grants from the Northern Ireland Executive (8%) and fees for services including building control and waste collection (22%) (DCLG, 2020).

Revenue Expenditure

The total revenue expenditure by local authorities in England is budgeted at £99.191 million in 2019–2020; this is an increase of 5.2% from £94.216 billion budgeted in 2018–2019. Education service expenditure is the largest component of spending. The education service expenditure of local governments is £34,296 million. Since 2014, the expenditures made by local governments in some public service branches have been constantly decreasing, but in 2020, there is a large increase in the expenditures of local governments because of Covid-19.

Net Current Expenditure

33.2% of total net current expenditure is set as the budget to be spent on education, 22.6% on adult social care, and 15.6% on housing benefits. Net current expenditure in 2019–2020 increased by 4.3% compared to the net current expenditure in 2018–2019.

5.2.6 *Auditing of Local Authorities*

In the UK, local governments are under parliamentary control. Parliament is able to change the organization, function, responsibilities and service standards of local governments, and transfer authority and responsibilities of local governments from one unit to another. In 1982, the government gave the supervision and a detailed management review of local government to the Public Accounts Committee (PAC). It has the legal power to audit finance and management of local government and evaluate the effect of policies that central governments carried out to help the local government provide public services. The members of PAC are appointed by the central government (Karasu, 2009: 239).

The National Audit Office (NAO) examines public expenditure on behalf of the parliament, independently of the central and local government. Every year the NAO audits the financial statements of all government departments and many other public institutions and produces around sixty-five value-for-money reports for parliament.

5.3 *Central-Local Government Relations*

In order to examine the relationship between local and central government in the UK, it is necessary to look at the local government structure, distribution of duties and powers, revenues, and the central government's supervisory authority (Al Towaitee et al., 2019).

In UK, local government is governed by a council elected by the people, and the council elects the mayor from among its members. The mayor is directly elected only in the Greater London Authorities and in very few local councils. In neighborhoods that do not have a council, decisions are taken by all local voters (Arıbaş, 2015). At this point, democratic practices are used in the election phase of local government bodies. The central government has no influence or pressure on the selection of local government organs. On the other hand, the vast majority of personnel working in local governments are not civil servants which are appointed by central government.

It is seen that decentralization is at the forefront in UK. A significant majority of public services are provided by local governments. However, central government performs performance management and financial controls on local governments. Due to trends such as privatization and governance, which have been popular since the 1980s, most of the tasks have been transferred to autonomous/ semi-autonomous and public benefit companies. At

this point, if the central government wishes, it can intervene indirectly in the duties and responsibilities of local governments.

Central government grants constitute an important part of the revenues of local governments. Since the central government provides significant financing to local governments, it monitors the current expenditures of local governments and prepares various reports on the expenditures of local governments.

The majority of local government decisions need not be submitted for ministerial approval. Ministries have the power to approve a very limited number of local government decisions. There is no tutelage administration institution in the UK such as the governorship.

The UK has the Local Government Ombudsman to resolve disputes between local governments and other authorities as unlike other countries. The Local Government Ombudsman is an institution that protects the rights of citizens in local governments and makes suggestions for local governments to be more effective (Temizel, 1997: 65). Its decisions are non-binding and but advisory.

6 PUBLIC PERSONNEL SYSTEM

6.1 *Overview of the Public Personnel System*

Unlike many other continental European countries, the UK does not have sufficient regulations in the field of administrative law. As a result of this, there is no public personnel regime and there is not a concept of public servants in UK similar to Continental Europe. However, in this context, some definitions are being made by way of traditional practices for the definition of public personnel and civil servants (Şahin & Aksoy, 2016: 18). In addition, public institutions have to act in accordance with the “prepared codes” under names such as “Civil Service Code,” “Civil Service Management Code,” and “Recruitment Code” while making arrangements for their personnel (Uğuz, 2010).

The organization responsible for personnel affairs in the England is the “Civil Service Commission.” The commission plays an important role in the selection of public personnel in all ministries, overseeing the organization of exams and interviews, and training of personnel.

More than five and a half million people are employed in the public sector in the UK. They work in local authorities and other public authorities as well as central administrative units. In the UK public sector, 3.349 million employees are in the central administration, 2.012 million personnel are in the local administration, and 199 thousand personnel are in public corporations. Total public sector employment was an estimated 5.56 million in the UK (Office for National Statistics, 2020).

Personnel working in the public sector in England are categorized into three groups. First group is civil servants. Civil servants are personnel who do not work in political or judicial bodies, but rather in ministries and their

affiliated institutions. They get their salaries from public allowances approved by parliament. They are also servants of the Crown and have cadre. In this context, ministers, judges, army employees, and those working in nationalized industrial institutions, local administrations, and autonomous organizations are not included in the civil servant category (Karasu, 2004: 127). According to Report of Civil Service Statistics 2020 published by Cabinet of National Statistics, the number of civil service personnel is 456,410. The largest number of civil servants (80,790) works in the Department for Work and Pensions. It is followed by ministry of justice with 75,920 civil servants. HM revenue and costume, Ministry of Defense, Home Office, Scottish government, and Department for Transport are some of the other institutions which have a lot of civil servants.

Second group is those employed by parliament. This category includes those working for the parliament and the employees of the National Audit Office, the Parliamentary Ombudsman, and the Electoral Commission, who report directly to the parliament. Constitutionally, employees of these institutions are not servants of the Crown and are therefore not considered civil servants.

Third group is other public servants. There are many institution employees in this category. Those working in these institutions are not considered civil servants, but they are public officials. This group includes:

- Non-Departmental Public Bodies (NDPBs), often known as Quangos, employees,
- The National Health Service employees,
- The Armed Forces employees,
- Public Corporations employees,
- Local Authorities employees.

Other public servants are employed on a contract basis and are subject to general labor law legislation. Employment conditions differ among public employers. Many civil servants also work in devolved administrations such as in Scotland, Wales, and Northern Ireland. However, UK public service statistics generally exclude workers for Diplomatic Service and Northern Ireland Public Service.

Although legal regulations on the public personnel system are quite limited in the UK, public personnel management is highly developed. On the other hand, the public personnel employment classification is less than many countries. However, it has been built in a modern structure due to used administrative techniques. In addition, the number of public personnel relative to the UK's population is high compared to a lot of countries.

6.2 *Administrative Techniques Used in Public Personnel System*

Each ministries department or agency sets out the rules of conduct for its staff. They must be honest and impartial in the fulfillment of their duties. In more detail, they should not engage in any political or public activity that might harm their current or future judges, nor should they abuse officer's statutes or knowledge, to disclose information they have obtained when carrying out their official duties. They should not use their official duties to further their private interests and should not accept any gifts or any other benefits that may reasonably be seen to jeopardize their decisions or honesty. The following, administrative techniques will be analyzed in the UK public personnel system.

6.2.1 *Structure*

The public service model consists of two structures: the open structure for higher ratings and the closed structure for the rest of the administrative classes. The closed civil service has two channels: the general, equivalent to general corps, and the specialized, equivalent to the special corps. The distribution of employees has some special features, such as a lack of employment in regional authorities, due to its close proximity to the organization, although employing about a forty percent of public employees. The central government is concentrated in agencies (about seventy-five percent) of the size of public employees (about twenty percent by health services or nationalized industries) and the civil servants in the departments are increasingly represented (Eurostat, 2017).

6.2.2 *Flexible Working*

There has been an increase of 5.5% in the proportion of senior civil servants working in flexible patterns. In April 2003, according to the 2002 Employment Act, families of children under the age of six or disabled children under the age of eighteen were allowed to request flexible work. Since 2007, this right has been expanded to include adult caregivers (Eurostat, 2017).

6.2.3 *Leave*

The separation in the 2006 Work and Family Act, which applies to all employees, is regulated and allows for separation—twenty-six weeks maternity leave. Maternity Payment or LMP (Legal Maternity Payment) can be paid for up to thirty-nine weeks and is paid by the employer, even if the government partially repays it. Paternity leave is arranged to be completed within fifty-six days after the child's actual date of birth.

Every employee who has completed one year of work with his employer has the right to receive a free parental leave for a child of 13 weeks of age for each child born or adopted. Parents of disabled children can take eighteen months leave until the child reaches the age of eighteen (Eurostat, 2017).

6.2.4 *Career-Based System*

In terms of administrative career, it is necessary to make a distinction between the senior civil servant and the others. The career of senior civil servants is centralized and clearly defined. However, promotions for employees in other categories are always transferred to departments or agencies that are self-contained in establishing their own criteria in accordance with the rights and capabilities metrics.

Professional promotion is not a matter of seniority in public administration, but it is concerned with evaluating the performance of a business that determines the remuneration and promotion to be paid. Civil servants' salaries are based on the minimum and maximum payment bands that are normally determined by each unit and are applied according to the performance evaluation results (Eurostat, 2017).

6.2.5 *Training*

The UK began to develop ongoing training programs in the 1980s. Despite the fact that education is not the center of management and funding, there is a development program to educate employees who have the potential to move to a national government school and senior public service positions for this purpose. It comprises Central Departments (the Home Civil Service), Diplomatic Service, Science and Engineering Fast Stream, Clerkships in Parliament, and Technical Development Officers. They are all known as the Graduate Fast Stream (Eurostat, 2017).

6.2.6 *Remuneration*

The Ministerial Departments and Executive Agencies are responsible for determining the wage scales within the scope of the Civil Service Management Code and for the economic limitations set by the Treasury. Senior public service has had its own payment system since 1996, formed by a salary scale that is audited by the Senior Salaries Review Agency (Eurostat, 2017).

6.2.7 *Social Dialogue and System of Representation*

The union membership rate in the UK is higher in the public sector than in the private sector. The Council of Ministers and the Treasury consult public service unions with issues that have broad impact on the public service. However, there are issues such as wages that are negotiated at the department or agency level. Some of the most controversial questions in the trade union field are the modernization of public administration and human resources, pension and work-life balance (Eurostat, 2017).

6.2.8 *Senior Civil Servants*

The Senior Civil Service Model is based on four key components: management, skills, results, and integrity. The wage levels are determined by Senior Salaries Review Body This Committee; members are appointed by the prime minister as an independent body and once a year to senior civil servants also

report every three years for political duties. Initially, payment is based entirely on productivity. In 2008, twenty-four percent of hired senior civil servants came from the private sector (Eurostat, 2017).

6.3 *Core Values and Key Features of Public Personnel System*

Some sources emphasize that the public personnel system of UK has traditionally been built on four fundamental principles. These principles are political neutrality, permanence, unity, and anonymity (Karasu, 2009).

6.3.1 *Political Neutrality*

Public personnel work with ruling party which has different political views. Therefore, the public personnel should be impartial. In this context, they are forbidden to participate in political activities and they also cannot declare a contrary opinion to the policies of the government and the ministers.

6.3.2 *Permanence*

The public personnel are not affected by government changes and they protect their cadres even when the government changes. The civil service is a career profession and operates independently from ruling party and other political powers.

6.3.3 *Unity*

It means the applications of standards that are determined only by central administration in the process of recruitment and the system of remuneration and promotion. According to this principle, all public personnel are subject to the same rules and standards.

6.3.4 *Anonymity*

Public personnel traditionally have the privilege of staying anonymous. The bilateral relations of ministers with public personnel and particular senior management are based on “confidentiality.” This principle suggests that ministers cannot take any political stance against public officials because of their proposed options.

6.4 *Unionization in the Public Personnel System*

In almost all areas of public sector in England, public personnel including polices and senior public managers have right to joining the union. This right dates back to the “Trade Union Act” that was issued in 1871. The unionization rate in the UK public sector is higher than in many other developed countries. In 2019, the unionization rate in the public sector was 52.3%; however, for the private sector, the unionization rate is only 13.3%. In terms of all sectors, the unionization rate in the England was approximately 23.5%

(Trade Union Membership Statistics, 2020). It could be said that this ratio is higher when compared to other countries.

7 NGOs/CIVIL SOCIETY

7.1 *Historical Development of NGOs/Civil Society*

The UK has a long history of civic participation and non-governmental organizations. For example, the Anti-Slavery Society, founded in England in 1839 and still operating, is considered to be the first organized NGO (Beriş, 2014: 249). The Great Depression in 1929 also greatly affected the importance and function of the structures in NGOs. During this period, many countries implemented Keynesian economic policies as a solution to the economic crisis. As a result of this, the area of activity and intervention of the state have expanded and the field of activity of NGOs has narrowed.

Since the 1980s, with the adoption of neo-liberal economic policies, NGOs have come to the fore again. In addition, with the popularity of the “Governance” approach, which is a new management model based on the mutual interaction, cooperation, and partnership between the public, private sector, and non-governmental organizations in society and state relations, NGOs have gained great importance. Today, NGOs have become indispensable components of the democratic structure and become actors in the political arena (Önder, 2006). Their numbers are constantly increasing.

7.2 *The Capacity of the NGOs*

The NGOs are very diverse in the UK. Legally registered organizations such as charity organizations, funds and foundations, as well as informal communities, voluntary groups, and citizens who are involved in volunteerism and social action constitute the NGOs. NGOs in the UK are seen in two different statuses as registered and unregistered. According to the researches conducted in 2018, there are a total of 168,186 NGOs registered with the Charity Commission (Gov.UK, 2021, October).

According to UK Civil Society Almanac 2020 report, in June 2019, the voluntary sector employed 909,088 people, of whom 620,868 were women and 288,220 were men, representing almost 3% of the total workforce in the UK (UK Civil Society Almanac, 2020). In the UK, civil society organizations are categorized according to various subsectors. These subsectors are:

- Social Services
- Employment and Training
- Culture and Recreation
- Religion
- Grant-Making Foundation
- Parent-Teacher Associations

- Development
- Village Halls
- Education
- Umbrella Bodies
- International
- Health
- Scout Group and Youth Clubs
- Environment
- Playgroups and Nurseries
- Law and Advocacy
- Housing
- Research

The total income of these subsector NGOs/Civil Society is £53.5bn. Social services remain the largest subsector in terms of both number of organizations and total income. There were 32,258 social services organizations in 2017/2018, which made up 19% of all organizations in the sector and generated an income of £12bn. On the other hand, social work is the largest single subsector with 338,963 employees accounting for 37% of the total workforce, followed by education (12%) and residential care (12%) (UK Civil Society Almanac, 2020).

Income sources of NGOs can be categorized into 6 different groups. These are the Public, the Government, National Lottery, Voluntary Sector, Private Sector, and Investment. The public remains the largest source of income for the sector. In 2017/2018, voluntary organizations received £25.4bn from the public, almost half (47%) of the sector's total income. The second largest income source is money from government, which constitutes 29% of total income. Other sources of income include money from the voluntary sector including trusts and foundations (10%), investments (8%), the private sector (5%), and the National Lottery (1%) (UK Civil Society Almanac, 2020).

7.3 *NGOs/Civil Society and Public Sector Relations*

Collaboration between the public sector and NGOs is common in the UK. An agreement called Compact has been signed between Coalition Government and their associated Non-Departmental Public Bodies, Arms Length Bodies and Executive Agencies, and civil society organizations (CSOs) in England. The main purpose of this agreement is to enable the government and NGOs to work together effectively to achieve common goals and outcomes for the benefit of communities and citizens in the UK.

The existence of Compact agreements between the government and NGOs and also providing a significant portion of NGO revenues by the central government indicate a strong cooperation between public sector and NGOs. This is also an important indicator of the existence of strong governance in the UK. In light of all these evaluations, it can be stated that NGOs in the

UK have a very diverse and developed structure. It should also be emphasized that they are a significant part of the UK administrative system.

8 RECENT REFORMS IN PUBLIC ADMINISTRATION

The UK is in a more important position than other countries in terms of public administration reform. It leads many countries in terms of public administration reforms. The ground of the first major reform movement in England was formed by the reports of Northcote-Trevelyan and Macaulay, which regulated the British personnel system. In these reports, merit and career principles were presented as a solution to the problems faced by the British personnel system, and favoritism in personnel selection was opposed. After this reform, entry to the public services was made compulsory with open competition examination in 1870 (Karasu, 2009). In 1968, “Fulton Report” prepared under the chairmanship of Lord Fulton, it was emphasized that bureaucrats should be selected based on expertise and the bureaucracy should be professionalized.

During 1980s, numerous public administration reforms were carried out with the coming to power of the Conservative Party led by Margaret Thatcher in England. These reforms can be evaluated as an important part of current “Modernizing Government Reforms.” The main aims of these reforms were to control public expenditure, to create a managerial culture at all levels, to delegate financial and managerial functions so that the administrators have the freedom to manage, to learn private sector, to concentrate on cost-effective and downsizing the central administration system (Jarvis, 2002; Önder, 2012).

Within the framework of public administration reforms, the interaction of public and private sector managers has been increased, performance management and performance indicators have been used effectively, and the number of executive bodies and advisory bodies has been increased. Financial management was tried to be improved to solve economic problems, and market mechanisms were focused in 1987. In 1992, the number of ministries was reduced. On the other hand, some important initiatives were emerged to development of public administration such as “Financial Management Initiative and “Next Steps Agencies Reforms.”

After 18 years of conservative rule, the Labor Party came to power in England in 1997. The first comprehensive reform initiative of the Blair government for public services and public organizations was the “Modernising Government” in 1999. Blair, Labor Party leader, defends the welfare (social) state by criticizing the liberal approaches advocating the small state and the liberal approach (Karasu, 2009). On the other hand, especially since the 2000s, the e-Government System has gained importance in England and important studies have been started in this field. According to United Nation e-Government Survey, the UK of Great Britain and Northern Ireland ranks 7th among 193 countries in the e-Government Development Index ranking (UN E-Government Survey, 2020).

Artificial intelligence is one of the areas where public administration reforms take place in the UK. A report which is related to AI is announced by the House of Commons' Science and Technology Committee on October 13, 2016. In this report, as well as stating the potential value and capabilities of artificial intelligence and robotics technology, its possible problems and negative consequences are also included. Government industrial strategy led to 2018's £950m AI Sector Deal, designed to catalyze AI research, development, and adoption in the UK. As a result of these development, the Office for Artificial Intelligence was established to implement the deal (Gov.Uk, 2021).

One of the major reforms in the UK in recent years is the departure of the UK from the European Union. UK citizens on June 23, 2016, narrowly voted to leave the EU in a referendum (51.9% yes to 48.1% no). As a result of referendum, Prime Minister David Cameron resigned and a new cabinet took over with the leadership of Theresa May. In this period called Brexit, the UK officially left the European Union on January 13, 2020, at 23:00. However, there was a transition period until January 1, 2021. Since 2021, UK has de facto separated from the European Union.

As can be seen, it is an inevitable fact that the UK plays a leading role in many areas of public administration reforms. Undoubtedly, it can be said that the rooted administrative and political tradition of the UK has a great influence on this situation.

9 CONCLUSION

The UK of Great Britain and Northern Ireland has established its distinctive structure in the administration for over 1000 years. Today, institutions used in many countries are used either by direct transfer from the UK or by regulating the conditions of that country. Leading the constitutionalism movements, developing powerful institutions, and having enough authority to establish his own sect under the pressure of Catholicism affected the governance styles of the states that were contemporary and later established. The activation of the parliament in the 1600s, that the Crown is still respected today, and including deep-rooted institutions in the management system even if they move away from their primary duties distinguish the UK from all other states.

The UK's developed culture of democracy is the most important proof that there is no need for written or rigid constitutions to establish democracy in a society. One of the points that distinguish the UK from the other states is that it depends on the traditions of the law. It is widely known that UK has an "unwritten constitution."

In the UK system, legislative, executive, and judiciary are not on a par with each other. The system in which legislative-executive cohesion is replaced by legislative-executive separation closes with the "political culture" (Nyadera & Islam, 2020) absorbed by the deep respect for the rule of law and the commitment to democratic tradition.

Sovereignty belongs directly to the parliament, not to the people. In theory, parliament is at a higher level than executive and judiciary. The government controls the executive; however, at the same time, the government also controls the legislative, as government members are the most influential figures in the majority party of the parliament, and legislation is often drawn up in the form of government bills.

In UK, the Crown is the symbolic leader but does not have other than a psychological cement function holding the country together and fulfilling symbolic duties. The queen has absolute immunity and cannot be sued in any way. In the UK political system, the prime minister is the owner of the political authority in the country. The prime minister mostly takes its strength from strong traditions and historically using king powers. The power of the prime minister is not only emerging from the appointment, dismissal of ministers, or leading the cabinet, but also from the authority over all public officials, the influence on other state organizations such as government commissions, and the authority to distribute titles such as lord.

In the UK system, the leader of the party that holds the majority in the House of Commons is the prime minister, while the prominent members of the party in the parliament also have the post in the cabinet and for the ministers outside the cabinet. Although the names and the number of ministries in the British government have changed from time to time, in recent years the cabinet has generally comprised around twenty ministers. Also, there are “departmental ministers” with no more than thirty cabinet members, except cabinet members, and a similar number of “sub-ministers.”

Although the UK is a unitary state, it has a strong and developed local government structures. The UK local governments do not have a uniform structure, they have very complex structure. In addition, the responsibilities, duties, and structures of local governments are formed by law enacted by the parliament.

While some public services such as education and social care are provided by ministries in many other countries, these services are provided by local governments in the UK. The provision of many public services by local governments indicates the presence of strong decentralization in the UK. The principle of subsidiarity is widely applied. In addition, the central tutelage institution does not appear in the UK, such as the governorate in many countries.

Local governments are authorized to collect and spend taxes in certain areas. They have also financial autonomy. In addition, they receive general-purpose assistance from the central government. In other word, 54% of local government revenue is transferred from central government. The government has a tendency to phase out central grants for local government, so that local government will be funded entirely through locally retained business rates and council tax aiming to encourage local authorities to promote local economic growth and to be financially self-sufficient. Financial supervision of local governments is carried out by the central government and the National Audit Office.

There is not a comprehensive unique definition of civil servants or public personnel in UK. The main reason for this situation is that the administrative law field is very new in the UK and started to develop after the twentieth century. However, some definitions are being made by way of traditional practices for the definition of public personnel and civil servants.

Personnel working in the public sector in England are categorized into three groups as civil servants, those employed by parliament, and other public servants. Public personnel are elected by fair and open competition on the basis of merit by Civil Service Commission. Career-based position system is one of the techniques used in the public personnel system.

NGOs have long tradition in UK. The NGOs are very diverse in the UK. Legally registered organizations such as charity organizations, funds, and foundations, as well as informal communities, voluntary groups, and citizens who are involved in volunteerism and social action constitute the NGOs. Today, 909,088 people employ in voluntary sector in UK. This is representing almost 3% of the total workforce in the UK. The total income of these subsector NGOs/Civil Society is £53.5m. Revenue sources of NGOs are the Public, the Government, National Lottery, Voluntary Sector, Private Sector, and Investment. The public remains the largest source of income for the sector.

NGOs and public sector partnerships are much developed in the UK. Collaboration between the public sector and NGOs is common in the UK. Compact has been signed between public sector and civil society to enable the government and NGOs to work together effectively to achieve common goals and outcomes for the benefit of communities and citizens in the UK. Social services remain the largest subsector in terms of both number of organizations and total income. There were 32,258 social services organizations.

UK is one of the leading countries in public administration reforms. Especially, the public administration reforms carried out by the Thatcher government in the 1980s affected the public administration of many countries. Reforms in the UK's public administration in recent years are related to the public personnel system, NPM, e-Government, and AI. In addition, the UK has made a major administration reform with its departure from the European Union with the process called Brexit (Table 3).

Table 3 Main features of public administration systems of UK

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Administrative history	Geopolitical situation	Strategic
	Colonial history	No (16.yy-still)
	Legacy of bureaucracy	Westminster System
	Centralized bureaucracy	Strong/
	Role of military	No military influence
	Political culture	Liberal and Conservative
	Administrative culture	Very participative
	Professionalism	High
	Politicization of bureaucracy	High
	Dominant state ideology	Secular and nationalist
Legal structure	Nature of constitution	Unwritten
	Origin of constitution	1215 Magna Carta
	Strong constitution	Yes
	Constitutional rigidity	No
	Created by	Civil initiatives
	Revised by bureaucracy	Civil initiative
	Administrative judiciary system	Moderate
Central government	State structure	Unitary
	Government structure	Parliamentary Monarchy
	Hierarchical structure	Strong
	Local extension agencies	Too many
	Central government	Yes (Strong)
	Coordinating mechanisms	Existence of coordinating internal and external structure/agencies
		Strong
	Transparent financing system	Strong
Local governments	Monitoring	Strong
	Independent regulatory agencies	Exist
	Financial autonomy	Moderate
	Political autonomy	Moderate
	Council types	Council mayor
	Mayors	Elected and in extraordinary cases appointed
	Decision making bodies	Exist (Local Councils)
	Central tutelage/monitoring	Not exist
	Subsidiarity principle	Exist
	Decentralization type	Devolution

(continued)

Table 3 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Intergovernmental relations	Logic for Division of tasks	Fair and rational
	Tutelage/monitoring	Strong
	Communication	Strong
Public personnel system	Civil services	Career based
	Scope of civil services	456,410 civil servants (8% of total workforce)
	Recruitment and promotion	Competitive
	Nationwide exam	Exist
	Politicization in general	Strong
CSOs/civil society	Unionization	Strong
	Size of Civil Society	909,088 people employed voluntary sector, total income of NGOs is £53.5bn and there are a total of 168,186 NGOs
	Institutionalization	Strong
	Partnership with the state	Strong
	Political pressure/domination	Weak
	Major financial revenues	The revenues from the public
	Supportive national culture	Strong
	Political regime & civil society relations	Strong
	Civil society	Prestigious
	Dominant reform paradigm	NPM reforms
Reform philosophy	Policy Transfer	Policy Adaptation
	E-Government reforms	Completed
	Artificial intelligence (AI) reforms	Exist
	Influence of international actors	Brexit Process
	New reforms (5 years)	AI, Brexit agreement, etc.

Source Adapted and developed from Önder and Zengin (2022)

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The Republic of France

Nadia Lahdili and Fella Djilaili

1 INTRODUCTION

Geographically, France is the third largest European country with a land area of 543,965 km² (Stevens, 2003: 2), sharing borders with Belgium, Germany, Luxembourg, Italy, Spain and Switzerland and is connected to England by an underground tunnel (Cole, 2005: 201). France's population reached 67 million in 2021, and has one of the largest urban populations globally (Statista, 2021a). Economically, France is the world's fifth-largest economy with a nominal GDP of 2,917.67 billion USD (International Monetary Fund, 2021a), and the second contributor to the European Union (EU) with 23.7 billion Euros in 2020 (Statista, 2021b). France was a founder member of the European Coal and Steel Community (ECSC), and the European Economic Community (EEC). These memberships enhanced the country's economic visibility, and modernization politics. France's economic power is due to factors such as natural resources, railway system, and labor policies especially after World War II (Cole, 2005: 202; Knapp & Wright, 2006: 19–20 and 25; Moretti & Kraan, 2018: 8; Stevens, 2003: 4). Nevertheless, some major challenges to the economy include public sector deficits, costs of the welfare system and unemployment which reached 7% (Moretti & Kraan, 2018: 8; Owen, 2000: 63; Statista, 2022).

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The French Revolution is a remarkable event for its social, political, and cultural significance. The state's traditions, emergence of nation-state, and republican values are based on the Declaration of the Rights of Man (1789) (Cole, 2005: 5–6; Knapp & Wright, 2006: 14–17; Stevens, 2003: 39). Article 1 of the 1958 Constitution states: “*France shall be an indivisible, secular, democratic and social Republic. It shall ensure the equality of all citizens before the law, without distinction of origin, race or religion. It shall respect all beliefs. It shall be organized on a decentralized basis*”. Nevertheless, France's laicism is debatable. French Muslims constitute the second largest religious group after Roman Catholics, and the largest in Western Europe (Lahdili, 2016; Lahdili et al., 2020: 120). Correspondingly, immigrants' presence can be approached from the lens of France's colonial history and “civilizing mission”.

In the seventeenth and eighteenth centuries, the kings' internal and foreign politics required a rational use of resources, mainly manpower and wealth, in order to manage their territory, and maintain their authority. Consequently, the administrative structure and system were developed to meet their quest (Stevens, 2003: 121). France's administration is influenced intrinsically by Napoleon Bonaparte, whose legacy was based on dual tradition of both authoritarian administrative institutions embodying a unified and centralized state, and participatory assemblies from the French Revolution (Knapp & Wright, 2006: 282–284; Stevens, 2003: 9–10). The robust French administrative culture and system were developed initially, before political democracy was instituted (Owen, 2000: 50–52). Furthermore, the French administrative system is characterized by bureaucratic order, hierarchy, universal rules, legally regulated procedures, and neutrality of civil servants.

Besides, France is an interesting case to study the intersection of political functions carried by politicians, and administrative functions executed by civil servants, especially when considering the profile of appointed officials into ministerial positions in the Fifth Republic. President Jacques Chirac, an *énarque*,¹ was a civil servant, before holding ministerial and presidential positions. Interestingly, two Presidents and six Prime Ministers attended *ÉNA* (Knapp & Wright, 2006: 76–79; Owen, 2000: 56 and 59; Stevens, 2003: 113). The three characterizing elements by which the Fifth Republic became an administrative state were: the state's economic role (*dirigisme*), the extension and efficiency of the administration's activities, and the ability of civil servants to occupy non-administrative positions (Knapp & Wright, 2006: 285–289). The nature of the highly elitist French administrative machinery was criticized from getting distant from the people (Owen, 2000: 53; Thoenig, 2006: 45).

This chapter looks at France's administrative system in changing context. It elaborates on the administrative history and major events from the pre-revolutionary era to the Napoleonic rule with its influence on France's current

¹ Graduate of *ÉNA*.

administrative system. It also explores the French constitutional and philosophical foundations, and the consequences of the 1958 Constitution on the central and local governments, their structures and scopes. Likewise, the development of civil society and peoples' tendency to join this sector was due to changing individualist behavior.

2 ADMINISTRATIVE HISTORY

France is a model of a strong centralized European state. Louis XIV absolutism, the 1789 French Revolution, and the subsequent Napoleonic rule, had brought long-term changes to the French administration (Braibant, 2002).

2.1 *The Pre-Revolutionary Monarchic Administration*

The early history of the French public administration goes back to the pre-revolutionary era i.e., the old order (*Ancien Régime*) since the thirteenth century, characterized by divine-right absolute monarchy and the king's own rules, authorities and mass power (Thuillier, 1980). The royal administration was seen as the affair of the king, and the role of the royal official consisted of arbitration between the different bodies of the society. The society's hierarchy was based on three estates: the clergy, the privileged nobility excluded from paying any taxes, and the majority (Elster & Goldhammer, 2011). The noble royal officials (*Prévôts, Sénéchaux, and Baillis*) represented the fundamental administrative unit in charge of contact between the king and his subjects by the virtue of judicial delegation. They were represented as judges and administrators holding the right to issue police regulation in their residential cities and towns (Müßig, 2018). In contrast, the self-administrative justice was exercised exclusively by the king and his authority was encompassing. The King's Council (*cassation*) represented a single powerful administrative body exercising power in a novel way. The administration was concerned with the maintenance of levying taxes, the provision for military needs, the commerce and the industry (Burdeau, 1994). The public service was feudal in context, and based on loyalty to the regime. Until its fall, the monarchy of the *Ancien Régime* was marked largely by attempts to impose central control over provinces. Still, public fonctionnaire had no statute but monarchical agents called "*Les officiers*", delegated by the king and only served him (Burdeau, 1994: 20). Because of venality, these positions became subsequently hereditary (patrimonial). However, following the revolutionaries of 1789, this vice was abolished, ending the old patterns of the sale of officers. Instead, these officers were elected by citizens as specified in the 1794 Constitution: "*The administrators are agents elected in time by the people to exercise administrative functions under the supervision and authority of the King*". Elections became the source of political legitimacy and a mechanism through which political personnel were chosen. The idea of the nation was no longer embodied by

the monarch but by the “people”. This laid the foundation for the formation of the Republic (*la République, Une et Indivisible*) as a united and an indivisible state with a strong central direction (Thuillier & Tulard, 1984).

2.2 *The Revolutionary Era*

The events of the French Revolution and its consequences have undoubtedly changed the course of France’s history and to a large extent that of Europe (Elster & Goldhammer, 2011: 20). Likewise, the political and administrative systems shifted away from absolute monarchism based on “divine right” and “hierarchical society” concerned with maintaining public order, levying taxes, running the military, the commerce and industry, to an egalitarian system promoting equality of all citizens (Stevens, 2003). In other words, all citizens had the right to access public positions and employment based on meritocracy. Consequently, the French Revolution ended the administrative system of the *Ancien Régime*. The collapse of the monarchic regime paved the way for Republicanism, supported by the morals it championed—rationality, liberty and equality, to anchor itself as the alternative administrative and political systems. Divisions soon flared between the Girondins who called for a “more moderate, more participatory” system. Republican model with a focus on local rights, and the Jacobins who advocated for a uniform and strong centralized republican system. The Jacobins still form a strong current in French politics known for their high regard of the State as “an indivisible and sovereign entity”, a “guardian of the general interest” and “its ability to transcend all sectional divisions among others” (Hazareesingh, 2002).

In addition, factions opposed to the Revolution and Republicanism sought to reestablish themselves. These included the monarchists who called for the return of the hierarchical society. Divisions were apparent and deep. Among those dissatisfied with the republican system was the Roman Catholic church, which, privileged under the *Ancien Régime* for its role in legitimizing the monarch’s rule, found itself losing its privileges, lands and influence (Hazareesingh, 2002: 7–8). The clique and its supporters emerged as the country’s right-wing and conservatives by the end of the nineteenth century leading to clashes between the clerical and anti-clerical forces. To date, clerical and anti-clerical sentiments exist in France despite often being intertwined with other debates (Hazareesingh, 2002).

Notwithstanding the merits of the elective system, the revolutionary era was also marked by the enormous expansion of bureaucracy and its power. Civil servants started having a political role mainly with the establishment of the *Commission des Dix-Sept*. The size and complexity of civil servants who occupied the bureaus in the central administration were remarkably high. The commission represented the highest number of all civil servants in Paris working under different hierarchical positions namely: first commission, the chiefs, the chefs of the Bureau and sous-chef (Thuillier, 1980: 16). Following

the fall of Robespierre, the commission faced many criticisms and attacks from Thermidorians due to their lack of expertise.

In 1793, France experienced the establishment of the committee of public safety which represented the second French government with an anti-bureaucratic orientation. Saint-Just, a key member of this committee, ardently criticized the bureaucracy and particularly the work of ministries for their excessive paperwork, ministerial despotism and procrastination of implementing the government's orders by civil servants (Thuillier & Tulard, 1984: 13).

2.3 *The Napoleonic Administrative Legacy*

The administration during the Napoleonic era has been portrayed by major reforms, modernization of *Ancien Régime's* archaic institutions and the crystallization of administrative rules that led to the establishment of French modern public administration (Thuillier & Tulard, 1984: 15). Napoleon's administrative legacy supported the direct popular sovereignty as incorporated during the Revolution. In contrast to the elected official system, Napoleon opted for a top-down system based on appointing local administrators as préfets, sous-préfets and maires to supervise and control the local government in territorial units *Départements* under the so-called the prefectoral system (Van Der Burg, 2016). The Napoleonic administration was characterized by a number of patterns. First, the Council of the State created by *de l'an VIII* Constitution replaced the king's council of the old regime as the new administrative institution. The state council consisted of 30 to 50 members known as *Conseillers d'état* appointed by the first council (Thuillier & Tulard, 1984: 16). They were responsible for drafting policy proposals, advising the ministries and managing administrative reforms during the Consulate and the Empire. This administrative instrument survived many changes during the nineteenth and twentieth centuries, its judicial role continued to improve and become a completely independent body in contemporary France (Grévisse, 1978). Second, the Napoleonic administration focused on the importance of functional uniformity, by which all the local authorities enjoy the same administrative and legal powers, and being independent from the Civil Court or Parliament control. Hence, a strong control system was created including inspectorates and administrative courts to protect the image and legitimacy of the state in case of any abuse or irregularity (Stevens, 2003: 10).

The Napoleonic system was to a certain extent a system of check and balance, and a dual system based on prestigious, efficient, centralized and authoritarian institutions on one hand and participatory assemblies on another hand combining the ancient royal administrative tradition with a unified, revolutionary and well-administered state. Indeed, this system continues to be the foundation of France's contemporary administration (Stevens, 2003).

2.4 *Sources of Political Culture in France*

The 1789 French Revolution impacted France's political thoughts and founded the aspects of its political culture and philosophy. The divorce of the State, representing the political power, and the Church, symbolizing the religious authority, with the establishment of 1905 Law, set up France's *laïcité* which remains the foundation, identity and constant of the state's public policy. Although France's model of secularism is controversial, in this context, *laïcité* means that the state does not fight religion, but aims at abolishing its influence in the political and administrative spheres, and to establish republican equality. As well, it establishes an apprehensive compromise that the French people have made between the Law of Separation and its atypical implementation within the French culture (Lahdili, 2016: 40–41). The separation of the State from the Church came at the end of the nineteenth century when the Catholic clergy lost its traditional influence in public institutions. This separation allowed the adoption of secular laws which gradually created new/modern social and political values based on republican universalism and gave people sovereignty and access to redefine the foundations of the state's executive, legislative and judicial institutions, as well as establish a non-religious school system (Lahdili, 2016: 42).

The two principles of the French political model are Republicanism which covers civic and political integration, and Secularism which encompasses religion. The republican universalism places central emphasis on national identity at the expense of subnational identities, particularly religious identity. Furthermore, the Enlightenment philosophy influenced the character of civic order (Owen, 2000: 52). These events explain the current socio-political order based on liberty and equality, as well as the legal framework on the separation of religious and political powers at the institutional level. As France's political culture concedes the centric position of the state, and the republican values in the administrative machinery, it is argued that this culture is a synthesis of state authority and rebellion against this stated authority (Cole, 2005: 47; Owen, 2000: 52).

3 LEGAL STRUCTURE

The constitution constitutes a backbone of democratic societies, and an essential reference in shaping states' political and governmental actions. The study of countries' legal framework or judicial structure is better understood holistically, whether the country is considered in the common law group, socialist group, the civil law group, etc. (Dainow, 1961). The constitution matters because it lays down all the legal and cultural aspects under which the people and governmental institutions are governed. Also, it defines the rules that shape the balance of power between different branches of government (Foucault, 2018).

3.1 *The Constitutional Structure*

Historically, until the thirteenth century the judicial structure was represented by the royal majesty who were recognized as both supreme jurisdiction entity and political authority within a territory. Jean Bodin (1576) pointed out in his book *Les Six Livres de la République* that the royal judicial sovereignty has dominated the political agenda in France's pre-state unification (Van Der Burg, 2016). French people have for a long time refused being governed by judges. The popular sovereignty was presented to prevent any application of judicial review (Dainow, 1961). Following the code of Napoleon in 1804, France has set up the first legal system, unified private law and replaced the fragmented legislations of pre-revolutionary France within the fundamental principles of civil liberty, private property and equality of individuals (Dainow, 1961, 1966).

This discussion covers the interpretation of the constitutional structure under the Fifth Republic of 1958, which had witnessed 175 years of constitutional instability, having 15 constitutions. Although the 1958 Constitution experienced multiple amendments, it continues to constitute the French contemporary legal framework (Rogoff, 2011).

3.2 *The Unitary Government Structure*

According to the French Constitution, the legislator is sovereign and represents the national will. The National Assembly is the lower house of the bicameral parliament; it is considered as the main platform for public debate of the national policies where peoples' will is expressed through deputies. The Senate is the upper house, made up of 348 Senators elected by part of the country's local councilors. In France, the bill becomes a legislation only when the votes are in identical terms in the National Assembly or in the two chambers of the parliament. The law which is voted by the parliament governs all issues and has a universal application. Moreover, the Fifth Republic Constitution set up a constitutional council and strengthened the executive power of the President of the Republic against the legislative and the judiciary. The right to submit questions of constitutionality to the council is reserved to the President, the Prime Minister and the presidents of the two chambers (Lijphart, 2012). Although the National Assembly is considered an important body of the legislative power, the parliament holds a limited constitutional sovereignty and is no longer the ultimate interpreter of the constitutionality due to the lack of power and prestige (Cole, 2005). Hence, France is among the countries with judicial review of the centralized kind (Lijphart, 2012).

As stated earlier, the government power is executive-focused and state-centric despite the decentralization reforms of 1982–1983 and 2003–2004, as well as the subordination of executive bodies to legislations. The function of the executive is not only to exercise the law, but also to make some laws in some cases under “the principle of decree-laws” with parliamentary authorization.

The administrative organization is not only a permanent work of the executive power, but also a governmental activity with its own rights separated from the political organization (Dainow, 1961: 6). Besides, the top bureaucrats served for a long time as policy professionals, their knowledge and skills enable them to draw policy goals and shape the pre-decision policies under the notion of “functional politicization” that might be supported by politicians (Page & Wright, 2007). In some cases, the political changes that might occur in the government can affect generally the top civil service level, but the permanent statutes as a civil servant remain the same, preserved by the law only in serious cases (Bezes & Le Lidec, 2007).

In addition, according to the Constitution, the judicial authority is the guardian of individual liberty; its independence should be guaranteed by The Supreme Judicial Council (*le conseil Supérieur de la Magistrature*), which rules on disciplinary matters and disciplinary sections of professional bodies. It also assists the President with nominated judges of the courts of Cassation, the minister of justice and other judges (Dainow, 1961: 8).

3.3 *The Administrative Judicial Structure*

Within the administrative framework, there crystalized a system of administrative tribunals, Courts or Tribunals headed by the Council of State. This council plays an influential role in advising the Council of Ministers about the proposed legislatives and the government alike. In France, there are 42 administrative tribunals (31 in metropolitan France and 11 in overseas territories), established to adjudicate administrative disputes between individuals and government agencies, as well as 8 administrative courts of appeal. The members of the administrative tribunals and administrative courts of appeal are mainly recruited from the *ÉNA*.

The regular courts have no power over the executive bodies or administrative agencies. So, due to the absence of judicial control over the executive, the people seek protection from the administrative court against any public authority abuse, harm or illegalities of state officials under the procedure called *recours*. The latter allows the citizen to sue for damages from the public authorities and seeks judicial redress for damages, or injustices suffered by the citizen. In France, the specialized courts include: The Court of Auditors, the Budget and Finance Disciplinary Court, the Central Commission of Social Aid, the Supreme Judicial Council, ruling on disciplinary matters and disciplinary sections of professional bodies, and the National Court of Asylum, ruling on appeals against refusals to grant refugee status (Conseil D'état, 2013).

4 CENTRAL GOVERNMENT

Central government plays an influential role in state prosperity. The centralization aspect is found in the Napoleonic system establishing statist, uniform,

powerful, prestigious and efficient administrative institutions (Knapp & Wright, 2006: 283; Larat, 2018: 344; Stevens, 2003: 10 and 122).

4.1 *The Political System*

The French contemporary system is part-presidential and part-parliamentary (Cole, 2005: 63; Owen, 2000: 54). This hybrid system which derives from the Fifth Republic (since 1958) as set by President Charles de Gaulle (1959–1969) strengthened the President’s executive power, as “the major focus of political decision-making” (Cole, 2005: 24–26; Knapp & Wright, 2006: 60; Stevens, 2003: 63). For instance, Mitterrand’s leadership reflected aspects of powerful French presidentship and control over political institutions i.e., presidential interventionism (Cole, 2005: 34). Alistair Cole (2005) argued that the French political system started losing some characteristics by the 1990s. For instance, after 2002 the presidential term-in-office was reduced from seven to five years (*quinquennat*), similar to that of the National Assembly (Stevens, 2003: 21).

4.2 *Scope of Central Administration*

Table 1

Table 1 Government branches and their functions in France

<i>Branches</i>		<i>Functions</i>
Legislature (Bicameral)	National Assembly (Lower House)	The National Assembly consists of 577 members directly elected for a five-year term in local majority votes
	Senate (Upper House)	The Senate consists of 577 and 348 members chosen by an electoral college of about 165,000 local elected officials for a six-year term Articles 24–33 on the Parliament duties include: to enact laws, to monitor government activities and to evaluate public policies
Executive (Semi-presidential)	President	The Head of State
	Prime Minister	The Head of Government
Judiciary	Court of Cassation	The highest court It controls the right application of the law by the inferior courts in civil, social, commercial and criminal matters There are also the Constitutional Council and the Council of State, etc.

Source (Gouvernement, n.d)

4.3 *Administrative Position of Head of State*

In France, the President is the principal executive leader, with strong powers in government, foreign and defense policies (Cole, 2005: 72; Moretti & Kraan, 2018: 7). The President's powers are stated in Articles 5–19 of the 1958 Constitution. His powers cover: the judicial, the legislative, the appointments in the public and military services and the diplomatic spheres. The President does:

- ensure, by his arbitration,² the proper functioning of the public authorities and the continuity of the State, and shall be the guarantor of national independence, territorial integrity and due respect for Treaties (Article 5).
- choose the ministerial team; he appoints the Prime Minister (Article 8), but has no right of dismissal.³
- retain the power to grant pardons (Article 17).
- ratify international treaties, and negotiates them (Article 52)
- preside the *Conseil National de la Magistrature*, and he is guaranteed judicial independence (Articles 64 and 65).

Furthermore, the President can send a written message to the parliament and has the right to demand a further reading of bills (Stevens, 2003: 72–73). He is not answerable to the legislature and can be removed only by a process of impeachment (Stevens, 2003: 49–55).

In France, the President is elected through direct suffrage (Article 6) (Knapp & Wright, 2006: 60). Arguably, the direct suffrage allows the President to “hold a mandate for the degree of freedom of action” (Stevens, 2003: 64). The head of state reflects the popular support and the voters choice. This was the case of de Gaulle in 1958 when introducing the Constitution of the Fifth Republic, still effective to this date (Knapp & Wright, 2006: 68). The French case demonstrates the encompassing and strong involvement of the President in decision-making.

On the presidential office, French Presidents are assisted by: 1) the cabinet, which manages the President's diary and mail; 2) the *chef d'état major particulier*, a military cell which advises the President on foreign policy, defense and security; and 3) the *secrétariat général* which represents the President in the intergovernmental arbitration committees (Cole, 2005: 67–68).

² It could be interpreted in a weak sense as the President being an ultimate referee in times of crisis, but in normal circumstances remaining above politics, and in a strong sense as the President's role to give direction to government action (Cole, 2005: 63).

³ In practice, Prime Ministers have been dismissed by the President (Stevens, 2003: 88).

4.4 *Administrative Position of Head of Government*

The head of government is the Prime Minister and is described as presidential lieutenant (Cole, 2005: 75). The Constitution states that both President and Prime Minister share power and cooperate. Article 19 on countersignature states that decisions, as specified in the article, must be countersigned by the Prime Minister (Cole, 2005: 65; Knapp & Wright, 2006: 62; Stevens, 2003: 67–68). Prime Ministers of the Fifth Republic acquired limited political power compared to Presidents' power in managing national politics. Nevertheless, the development of governments and party system helped them acquire strong political presence and freedom of action (Stevens, 2003: 67). On the dynamics of shared powers, this tends to be based largely on profile, propinquity and practice, rather than on rigid interpretation of legal texts (Cole, 2005: 76; Stevens, 2003: 69).

Prime Minister's conventional roles consist of coordinating and managing ministers' actions (Cole, 2005: 77; Larat, 2018: 330; Stevens, 2003: 78–81), and some of his administrative roles include:

- Managing the government collective actions and services by the General Secretariat of the Government⁴;
- Coordinating European Community and defense policies with the General Secretariat of the Interministerial Committee on European Economic Cooperation, and the Secretariat General for national defense; and
- Providing organizational and administrative support to autonomous institutions, such as the ombudsman, the committee for access to official documents, etc.

The Prime Minister undertakes his roles in the private office consisting of *directeur de cabinet*, *conseillers principaux* and *Grand Corps* (Stevens, 2003: 78).

4.5 *Ministries*

Ministers are appointed and dismissed by the President, but on the Prime Minister's proposal (Moretti & Kraan, 2018: 7). As of 2021, there are 16 ministries with full cabinet ministers, junior ministers (Secretary of State), ministers of state and minister delegates. The cabinet's size varies depending on the minister's seniority (Owen, 2000: 57). In 1995, Prime Minister Alain Juppé set the number of members of ministerial cabinets to five for cabinet ministers, and three junior ministers, six months later, it was raised to twelve for cabinet ministers, eight for delegated ministers and six for junior ministers

⁴ The Secretariat is considered as a politico-administrative agent, staffed by career civil servants, who coordinate government policy, before and after decisions are endorsed by the Council of Ministers (Cole, 2005: 77).

(Stevens, 2003: 118). The cabinet accounts for 31 ministers, with 17 women and 14 men (Cook, 2020). The ministerial responsibilities are set in a legal document (*décret*), published in the journal official and the minister's website. On the other side, conflicts over resources between and within ministries are probable (Cole, 2005: 103; Knapp & Wright, 2006: 294). Likewise, the changes in the structure of ministerial responsibilities can cause disputes when governments are formed, however, the structure and responsibilities of sensitive ministries such as defense, interior, justice, foreign affairs and agriculture are generally stable (Stevens, 2003: 108). Besides setting out cases by arbitration, mechanisms such as Interministerial Delegation ensure coordination between ministries (Cole, 2005: 105; Stevens, 2003: 80).

4.6 Agencies

In France, the development of public agencies stemmed from the aim to create consultative bodies in decision-making processes (Larat, 2018: 331; Owen, 2000: 60). Under de Gaulle's leadership, the French system promoted two bodies: The Constitutional Council (Articles 56–63) fulfilling legal and advisory functions such as “legality and validity of presidential, senatorial and National Assembly elections and referendums” (Cole, 2005: 92; Knapp & Wright, 2006: 63; Stevens, 2003: 57 and 104–105), and the Economic, Social and Environmental Council (Articles 69–71) (Gouvernement, n.d). These councils represent other mechanisms of representation besides electoral mechanisms (Stevens, 2003: 41–42). Within the framework of its advisory function, the President consults with the Constitutional Council on emergency powers (Article 16). Also, the President appoints Council's Head, and may submit proposed legislation or treaty to it, grant or refuse a request that a referendum be held (Cole, 2005: 91–92; Stevens, 2003: 74–75). The Economic, Social and Environmental Council was founded as a consultative body to advise government or parliament on economic, social or environmental issues, and on government private members' bills, draft ordinances and decrees (Articles 69 and 70). The Council of State, staffed by the best *énarques*, is the highest administrative court in France. It exercises judicial and administrative control over institutions mainly the Court of Accounts, the Higher Council of the Magistrature and the Higher National Education Council (Cole, 2005: 93–94). The Council of State includes five regional appeals courts (*cours administratives d'appels*), as well as thirty-three local courts (*tribunaux administratifs*) (Cole, 2005: 93). While the local administrative tribunals hear cases in the first instance, the Council hears the appeals and makes final decisions. Besides, it advises the government on the legal structure of proposed regulations (Cole, 2005: 93; Stevens, 2003: 103). Likewise, the Court of Accounts/Auditors, a judicial body independent from the executive and legislative branches (Article 47–2), fulfills advisory and judicial functions, as checks the legality and accuracy of public finances (Larat, 2018: 332; Moretti & Kraan, 2018: 59; Owen, 2000: 68–70).

4.7 *Financing*

France is the third largest European economy after Germany and the United Kingdom (International Monetary Fund, 2021b). In 2021, France spent about 112.22 billion Euros for local authorities, 76.04 billion Euros for school education, 65.22 billion Euros for defense, 60.22 billion Euros for pensions, and 15.87 billion Euros for territories' cohesion (Statista, 2021c). The Central government expenditure on the public sector dropped from 44.78% in 2010 to 40.31% in 2015 (Larat, 2018: 324). In 2017, the shares of sub-sectors general government expenditures were: 46% on social security, 35% on central government and 19% on local government (Moretti & Kraan, 2018: 11). On the other hand, public debt reached 112% of the GDP in 2020 (Statista, 2021c).

In addition, the French management style is based on *dirigisme* whereby the state plays the role of an entrepreneur (Cole, 2005: 217–221; Knapp & Wright, 2006: 18–21 and 41–44). Furthermore, the financing culture is characterized by the foundations of committees and agencies such as the Central Bank, the Economic and Social Fund, the National Credit Council and the Planning Agencies which play an instrumental role in consulting with the Ministry of Finance (Owen, 2000: 63–64).

5 LOCAL GOVERNMENT

The aspects of France's local government are based on the Napoleonic model, and its framework is based on the 1982–1983 and 2003–2004 decentralization aspects. Under Napoleon's state, the *départements* and *communes* were defined as “administrative territories” (Kersting et al., 2009: 45). In the nineteenth century, with the local territorial reforms, the *départements* and the *communes* (municipalities) were recognized as “territorially defined local self-government units”, and exercise their functions under the prefect's tutelage (Kersting et al., 2009: 45; Wollmann, 2004: 655; Wollmann & Bouckaert, 2006: 19).

France's decentralized local administrations are classified into:

- a. Decentralized administrations forming territorial public establishments with full power over defined policies, and these include *regions*, *départements* and *communes*.
- b. Deconcentrated administrations constituting local public establishments subject to tutelage by the central government, and these include regional prefects, prefects and subprefects.

5.1 *Administrative Structure of Local Government*

As demonstrated in Table 2, the French structure of local government (*collectivités territoriales*) is divided into: *Régions*, *Départements*, *Communes* and inter-communal bodies (Wollmann, 2004: 655; Wollmann & Bouckaert,

Table 2 Local government structure in France

<i>Level</i>	<i>Year of territorial reform</i>	<i>Functional weight</i>	<i>Territorial profile</i>
Régions	1982	small	
Départements	1790	moderate	Oversize
Communes	1790	small	Undersize
Intercommunal Bodies	1890, 1956, 1999	small	Institutional overcrowding

Source (Kersting et al., 2009: 38)

2006: 15). While *départements* have a moderate functional weight, the rest of local government units possess a small functional weight. Nevertheless, the French local governments enjoy an equal legal status, and “no territorial community may exercise authority over another” (Article 72) (Kersting et al., 2009: 47).

- a. *Régions*: France is divided into 18 administrative regions, 13 are in metropolitan France, and 5 are overseas. Regions were introduced by Law of July 5, 1972. Law of 1982 on the Rights and Freedoms of Communes, Departments and Regions (*Loi Deferre*) defined regions as forming an “*independent local self-government level with an elected regional council (conseil régional) and a council-elected executive (président du conseil régional)*” (Kuhlmann & Wollmann, 2014: 59; Larat, 2018: 326).
- b. *Départements*: There are 96 departments in metropolitan France and 5 overseas departments. *Départements* were created by Bourbon kings to expand their rule, and they constitute the territorial basis for the department-based state administration (Kuhlmann & Wollmann, 2014: 60; Wollmann & Bouckaert, 2006: 15). Each *département* has a prefect who acts as the local representative of the central government and supervises the work of local government (Cole, 2005: 5–6; Stevens, 2003: 9). Each *département* is administered by an elected body called *conseil départemental*. Local services of the State/central administration are organized at departmental level (Knapp & Wright, 2006: 283; Larat, 2018: 326).
- c. *Communes*: The basic unit of local organization in France is the *commune* (Kersting et al., 2009: 45). There exist 35 416 *communes* (Larat, 2018: 326). The *communes*’ task and autonomy were very limited until the 1980s (Larat, 2018: 327). Although the communes were functionally weak, *cumul de mandats* which mayors (*agents d’État*) hold enabled them to become politically strong (Wollmann, 2004: 655).

Notwithstanding, the French territorial administration was by large and far described as “*millefeuille territorial*” due to its strata. Nicolas Sarkozy (2007–2012), François Hollande (2012–2017) and Emmanuel Macron (2017–2022) argued on reducing the number of administrative levels, and re-forming the roles of state and local governments (Armand, 2019; Frémont, 2014). The state reduced transfers to communities from 100.6 billion euros in 2012 to 2.25 billion by 2015 (Bensoussan & Fabre, 2012). Likewise, the Court of Auditors criticized the “confusion” even “lack of clarity” in the organization of local authorities and recommends that the State “refocuses” on its sovereign missions and reorganizes its services (Guichard, 2017). The European Commission also criticized the local administrative levels, stating that they engender duplication, incoordination and confusion of roles. Interestingly, the Commission reported that 40% of the municipalities in the EU are in France where their average population is 1,800 inhabitants (Hebert, 2013). With this in mind, Eric Giuily (2015, cited in IFRAP, 2015) argued that France must reduce its structural and operating costs, especially at the local level. For this, his approach is structured around forgoing the Napoleonic uniformity, reducing the number of management levels in each territory, and renovating local democracy by restoring the fundamentals of fiscal and electoral responsibility (IFRAP, 2015).

5.2 Scope of Local Governments

The constitutional guarantee of local self-government is stipulated in Articles 34 and 72 of the Constitution (Kuhlmann & Wollmann, 2014: 59). According to Article 72: “*Territorial communities may take decisions in all matters arising under powers that can best be exercised at their level. In the conditions provided for by statute, these communities shall be self-governing through elected councils and shall have power to make regulations for matters coming within their jurisdiction*”.

The sharing of powers between regions, departments and municipalities has reinforced the separation of local public action (Epstein, 2013). As shown in Table 3, the main task of the local authorities consists of handling town planning. Tasks that are mandatory for communes may be either delegated to other levels such as syndicates of communes (waste disposal, busing, etc.) or

Table 3 Local government responsibilities in France

Country	Town Planning	Education (basic)	Health (primary)	Water/Sewerage	Energy	Transport	Security
France	Yes	Yes	Partly	Partly	Partly	Partly	Partly

Source (Kersting et al., 2009: 24)

sub-contracted to private companies (water management, public transportation, etc.) (Thoenig, 2006: 43). As a consequence of decentralization, *régions* manage upper secondary schools and vocational training of the unemployed. The *régions* are in charge of economic and infrastructural planning, although this remains limited (Aydn et al., 2020; Kersting et al., 2009: 47). The *départements* have benefited from the devolution of public functions. They handle social services which extended with the 1988 and 2003 reforms of *Révenu Minimum Insertion* (RMI), health-care programs and lower secondary schools, while management of urban public transport, kindergartens, primary schools, libraries and museums is given to municipalities (Kersting et al., 2009: 47; Moretti & Kraan, 2018: 20). Furthermore, the transfer of responsibilities to the municipalities (*communes*) is mainly in the urban planning and housing (Brunet-Jailly, 2007: 6; Wollmann & Bouckaert, 2006: 20). Nevertheless, the limited transfer of responsibilities to the *communes*, even with the decentralization reforms, can be seen in administrative capacity of the majority small municipalities (Kersting et al., 2009: 47). In the context of local service provision, the French model comprises a deconcentrated administration, and the tasks and utilities are based on public-private cooperation, or contracted out to private providers in the form of outsourcing (Kuhlmann & Wollmann, 2014: 60–61).

5.3 *Organs of Local Authorities*

The local government units must be administered by elected councils (Article 72). The 1982 decentralization legislation permitted direct election of regional councils and enhanced the *départements* and *communes* decision-making powers (Cole, 2011: 388; Knapp & Wright, 2006: 35–36; Larat, 2018: 342). In 1986, direct elections to regional councils were held aftermath decentralization (Stevens, 2003: 141 and 148). At the local level, the prefect is the “regional backbone of central government”, “policy coordinator” and “adaptor to local needs” (Bezes et al., 2013: 154; Edwards & Hupe, 2000: 137; Wollmann, 2004: 655). He/she is appointed by the government, and answerable to the interior minister (Larat, 2018: 327). He/she works on conformity of central mandates with the local needs, oversees ministries’ local branches and field services, and coordinates with the center (Cole, 2011: 387; Wollmann & Bouckaert, 2006: 19).

Besides, he/she exercises administrative oversight when a decision taken is unlawful or legality review, as effect of the decentralization reforms (Knapp & Wright, 2006: 35; Owen, 2000: 65; Wollmann, 2004: 656; Wollmann & Bouckaert, 2006: 21; Larat, 2018: 327). Notwithstanding, he/she also tries to keep confidence from the political elites who are located in his geographical jurisdiction (Thoenig, 2006: 52). On the other side, the mayor, who is the municipality’s executive chief, enjoys *cumul de mandats* which allows him/her to exercise influence on regional and central level policy-making (Wollmann & Bouckaert, 2006: 19). He/she also holds and accumulates seats in upper-level

elected/representative bodies (Kuhlmann & Wollmann, 2014: 59; Wollmann, 2004: 655). Having said that, the prefect's and mayor's regulatory power and orders only apply to their own area and are subject to law (Edwards & Hupe, 2000: 135).

5.4 *Financial Structure of Local Governments*

The two forms of revenues of local governments include direct taxation (business, land, property) and indirect local taxation (local amenities tax, public transport contribution, tourist tax, advertising tax, etc.) (Kersting et al., 2009: 45). Nevertheless, these authorities have freedoms to finance their own projects without applying for state grants (Knapp & Wright, 2006: 35). Besides, they pursue “co-funded” and “quasi-contractual partnerships” (Thoenig, 2006: 45).

In 2015, local taxation collected amounted to 132.5 billion euros, almost 57% of the resources of local authorities, while the borrowing of local authorities and their own tax represented 16.2 billion euros, that is about 7% of their total revenue. Similarly, state financial transfers to local governments amounted to 99.9 billion euros in 2017, and are made up of state aid to local authorities (49.1 billion euros), mainly made up of grants—steadily declining as part of the reduction in state grants; local tax breaks and specific subsidies paid by ministries; transferred taxation, for which the legislator determines a local share of the base (Vie Publique, 2018).

Having said that, some territories struggle to improve their capacities or become financially strong (Knapp & Wright, 2006: 36). Indeed, local governments' financial independence is related to central governments, and their ability to raise revenue can make them independent powers (Chandler, 2014: 4). In France, the majority of *communes* have an average population of 1,700 inhabitants, yet, they [*communes*] possess limited capacity to handle their tasks, for which they fail to exercise “from below” or “from within” coordination (Wollmann & Bouckaert, 2006: 20). As a consequence of budgetary or administrative constraints, small municipalities opted for *Établissements Publics de Coopération Intercommunale* (EPCI) mainly the inter-communal single-purpose formations (*syndicats à vocation unique* or SIVU, based on the 1890 laws), and the inter-communal multi-purpose bodies (*syndicats à vocation multiple* or SIVOM, based on the 1959 laws) (Wollmann, 2004: 656; Wollmann & Bouckaert, 2006: 20). Thus, cooperation remains a key policy mechanism for small municipalities with limited resources to strengthen their capacity.

In the context of changing regional conditions of the EU politics, or global conditions, coupled with the rising demands from the people for effective administration, the service provisions by these stipulated authorities need to ensure continuity and adaptability.

6 CENTRAL-LOCAL GOVERNMENT RELATIONS

The center-periphery relation is useful to understand the interdependence between French central and local governments (Eberlein, 1996). Likewise, the idea of the profound state and provincialism is traditionally elaborated in the central-local government relationship (Cole, 2005), with aspects of influence that the center exercises over the periphery.

Although Article 1 of the 1958 Constitution states that France is organized on a decentralized basis, the French administrative machinery is center-dominated, and the state is omnipresent (Brunet-Jailly, 2007: 5; Kersting et al., 2009: 46; Larat, 2018: 341; Thoening, 2006: 40). This tendency is rooted in the Napoleonic model featuring a strong centralized government and bureaucracy, and a traditional political culture based on the acceptance of the center's authority (Kuhlmann & Wollmann, 2014: 16). The implication of the French Revolution and Napoleonic legacy on the administrative development influenced the role of the central state whose government and administration are based on law of February 17, 1800 (Kuhlmann & Wollmann, 2014: 58). The state is generally regarded as "constituting the expression of the general will, to preserve peoples' rights and enforce uniformity" (Cole, 2005: 50–51; Knapp & Wright, 2006: 22–23; Owen, 2000: 52; Wollmann & Bouckaert, 2006: 18–19). In the French administrative context, uniformity came to mean that the state exercises centralizing power, while based on the Napoleonic administration, the territorial and functional uniformity stipulates that "all local authorities regardless of their size, possess equal legal and administrative powers, and that uniformity shapes the functional and operational aspects of public services" (Knapp & Wright, 2006: 283; Stevens, 2003: 10 and 122). Furthermore, coordination, being a major administrative mechanism to evaluate intergovernmental relations, is complex, and this can be understood from the central and local governments' discussion.

Despite the principles of autonomy and decentralization, the central government is seen as exercising a "supervisory role" over the local government which comparably still has limited financial autonomy, as such, the central government fixes the local tax rates and operating costs (Larat, 2018: 328–329). In the context of deconcentration, the central state administrations aimed, in a logic of survival, to strengthen their territorial services so as to provide communities with quality services (Epstein, 2013). Besides, ministries do operate at the grassroot level by establishing their field offices of sectoral administrative units (*services extérieurs*) (Thoening, 2006: 42; Wollmann, 2004: 660; Wollmann & Bouckaert, 2006: 19). This operation involves not only an institutional presence but also a cultural influence as central institutions are influenced by their own culture at the local level (Önder & Nyadera, 2020; Thoening, 2006: 44). In France, subnational policy-implementation units are formed, making municipalities weak players in their own territory. Additionally, local fragmentation allows the central state and its agencies to hold "real

powers” and “real influence” in areas that fall under the competence of local communities.

Another embodiment of the center’s governance at the local level is the appointment of the prefect (Kuhlmann & Wollmann, 2014: 58). This reflects further apparent organizational and managerial presence if not dominance of the center at the local level, and the subordination of provinces to Paris. Nevertheless, it is argued that the prefect’s regulatory resource has been diminishing, while the local authorities’ capacities were on rise (Négrier, 1999: 126). Undeniably, the financial and technical resources of the center can be a mechanism by which the center holds strength over the periphery. For these reasons, it is widely stated that the intergovernmental structural approach of the French administration is “dualist”, as public functions are transferred to elected local authorities, or carried by the field offices (Wollmann & Bouckaert, 2006: 19).

Notwithstanding the influence of the central government, regional political dynamics mainly the EU politics enabled the French local government to become independent to a certain extent from the center, and make their own developmental policies, what Eberlein (1996) described as “quasi-federalism in unitary disguise” (Owen, 2000: 62–63). For instance, the National Commission on Standards Assessment was proposed to study the impact of EU legislations and directives which have direct impact at the local level (Larat, 2018: 328–329). Additionally, contractualisation taking forms of partnerships, such as *Contrat de Plan État-région* or *Contrats de Ville*, and involving diverse policy stakeholders has been adopted to deal with the overlapping and sectoralisation of responsibilities and resources, enhance coordination and cooperation among different units, and avoid fragmentation problems (Brunet-Jailly, 2007: 16–17; Lafarge, 2012: 106; Négrier, 1999: 127–128; Wollmann, 2004: 658; Wollmann & Bouckaert, 2006: 21). As a consequence of decentralization, many policies are implemented by local governments, while others are co-produced by the state and the local governments (Bezes et al., 2013: 159). For this purpose, the 2003 constitutional reform encouraged cooperation among all levels of government as a necessary policy mechanism for coherent actions (Brunet-Jailly, 2007: 8).

7 PUBLIC PERSONNEL SYSTEM

La fonction publique or civil service as defined by Philippe Bezes and Gilles Jeannot (2011) refers to a complex institution traditionally associated with the idea of a strong state tradition, based on unified merit and career-based civil service system. Civil service covers different forms of organizational and public activities promoting the principles of equality, continuity and adaptability. The legitimacy of the public service is rooted in serving the general interests of the state and differentiated under its specific administrative law (Bezes & Jeannot, 2011). Article 20 of the 1958 Constitution states that “*the civil service is at the disposal of the government*”. The French civil service is reputable for its highly trained and competent personnel. Considering the profile of high

officials and their background, the Fifth Republic is described as the “Civil Servants’ Republic” (Owen, 2000: 56).

7.1 *Overview of the Public Personnel System*

Civil service in France has traditionally been characterized by its strong and prestigious top bureaucrats within the state. Other distinct features of French civil service can be distinguished differently through the successive French regimes mainly authoritarianism, monarchism, Bonapartist and Republicanism. The Fifth Republic’s centralized political system for example accentuated the role of administrative elitists and privileged them to occupy key social, administrative and political positions (Bezes & Le Lidec, 2007). This was further strengthened during de Gaulle era (Thirion, 2000). For instance, top civil servants especially the *préfets* and ministerial cabinets were privileged to access top political positions in the central government and participate in drawing modernization policies (Bezes & Le Lidec, 2007: 122). As opposed to the parliamentary appointment, the number of *les Grands Corps* increased from 24.3% under Mollet to 41.8% under Pompidou in 1966. This signified a rise in top bureaucrats’ occupation to political positions. Besides, the rise of technocracy helped the skilled civil servants to impose their views and supported the modernization policies as demonstrated in the famous ordonnances of 1959 by their capacities in domains such as agriculture, health and economy. However, the waves of decentralization, privatization and Europeanisation during the 1980s have questioned the role of public personnel administrative adaptation under the social, political and economic changing dynamics (Thirion, 2000).

The professionalization and the institutionalization of the civil service were crystalized with the establishment of the *ÉNA* in 1945, as a centralized and prestigious school for state’s top civil servants and elites (Eyméri-Douzans, 2006). Offering candidates with education and training, the *énarques* join the political life in France. The school also organizes, through the final ranking, their appointment to specific corps, and increases their employability. However recent reports criticized the school for lacking modern public management techniques and called for the development of new skills such as communication, management, negotiation and contracting (Bezes & Le Lidec, 2007: 146).

7.2 *Administrative Techniques, Recruitment and Remuneration*

As shown in Table 4, the French civil servants are divided into three levels: central government, territorial authorities and hospitals (Larat, 2018: 334). According to their position, civil servants are classified into three categories, as shown in Table 5. *Les Grands Corps* also constitute an important segment of France’s civil service; they are involved in the decision-making. This category includes high-level bureaucrats occupying notable positions in the High

Table 4 Types of public personnel in France according to sector

<i>Type</i>	<i>Level</i>	<i>Division</i>
State Public Service (FPE)	Central government	Ministries, national administrative public institutions, etc
Territorial Public Service (FPT)	Territorial authorities	Regional councils, local government-funded institutions, etc
Hospital Public Service (FPH)	Hospitals	Public hospitals, elderly and medical-social institutions, social welfare establishments, etc

Source (Ministry of Transformation & Civil Service, 2021)

Table 5 Categories of civil service in France according to the position

<i>Category</i>	<i>Position</i>	<i>% of civil servants</i>	<i>Task</i>
A	Senior managers, engineers, directors, professors	29.7	Policy-making, strategy setting, decision-making
B	Middle managers, intermediate professionals, engineers	24.3	Policy implementation
C	Field employees, operators, administrative assistants, maintenance staff, manual workers	46	Policy execution

Source (Eurostat, 2018; Larat, 2018: 334–335)

Court, the Council of State, the Court of Auditors, Diplomatic corps, etc. (Howarth, 2001: 4; Larat, 2018: 338).

Almost half of public servants work at the central government. Their working framework is based on the General Regulations of the public service (*statut général de la fonction publique*), under the legislation of July 13, 1983 (Law n° 83–634), with Title I on the general statutes, rights and obligations of civil servants (Ministry of Transformation & Civil Service, 2021). The influence of the Napoleonic legacy can be seen in the career-based nature and the highly competitive system to join the civil service.

In France, recruitment is based on an examination system and rigid selection (Kuhlmann & Wollmann, 2014: 63). According to Article 6 of the 1789 Declaration of the Rights of Man and of the Citizen: “*All Citizens, being equal in rights, are equally admissible to all public dignities, places and employments, according to their capacity, and without any distinction other than that of their virtues and their talents*” (Ministry of Transformation & Civil Service, 2021). Exams and training take place annually in the prestigious *grandes écoles* namely

Table 6 Main features of public administration systems in France

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Administrative History	Geopolitical situation	Strategic
	Colonial history	A former colonial power guided by <i>mission civilisatrice</i> doctrine
	Legacy of bureaucracy	Strong and based on Napoleonic model
	Centralized bureaucracy	Unitary-centralized (Strong due to unitary system and center-domination)
	Role of military	Influential
	Political culture	Based on laicism and republican values
	Administrative culture	High based on public interest
	Professionalism	High
	Politicization of bureaucracy	High based on politics-administration nexus
	Dominant state ideology	Secularism and dirigisme
Legal Structure	Nature of constitution	Written
	Origin of constitution	The 1789 French Revolution, the 1789 Declaration of the Rights of Man, the 1958 Fifth Republic
	Strong constitution	Yes
	Constitutional rigidity	Since 1958 with few amendments and difficulty to amend
	Created by	Experts, lawyers, politicians, bureaucrats
	Revised by bureaucracy	Civil initiatives
	Administrative judiciary system	Strong
Central Government	State structure	Unitary
	Government structure	Semi-presidential
	Hierarchical structure	Strong
	Local extension agencies	Limited to specific areas, agentification
	Central government	Strong
	Coordinating mechanisms	Existence of coordinating internal and external structure/agencies

(continued)

Table 6 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Local Governments	Transparent financing system	Strong
	Monitoring	Strong
	Independent regulatory agencies	Exist
	Financial autonomy	Moderate to high
	Political autonomy	Relatively high
	Council types	Council of mayor/Communes Assembly
	Mayors	Elected
	Decision making bodies	Exist
	Central tutelage/monitoring	Exist
	Subsidiarity principle	Exist
Intergovernmental Relations	Decentralization type	Devolution (deconcentration), privatization, contracting out, outsourcing
	Logic for Division of tasks	Fair and rational (fused system)
Public Personnel System	Tutelage/monitoring	Strong
	Communication	Strong and formal
	Civil services	Career-based and prestigious based on Napoleonic Legacy
	Scope of civil services	Expensive, based on categories and sectors
CSOs/Civil Society	Recruitment and promotion	Competitive and fair
	Nationwide exam	Exist
	Politicization in general	Strong
	Unionization	Strong
	Size of Civil Society	1.45 million active associations, 90% volunteering rates, 10% waged workers, feminine majority
	Institutionalization	Moderate
	Partnership with the state	Weak
	Political pressure/domination	Moderate
Major financial revenues	Charity foundations	
Supportive national culture	Weak	
Political regime & civil society relations	Weak	

(continued)

Table 6 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Reform Philosophy	Civil society	Prestigious
	Dominant reform paradigm	NPM and Governance reforms
	Policy Transfer	Policy adaptation/policy adoption
	E-government reforms	Completed
	Artificial intelligence (AI) reforms	Exist
	Influence of international actors	UN, EU, OECD, NATO
	New Reforms	Performance management, modernization

Source Adapted and developed from Önder, M. & Zengin Ü. N. (2022). A framework for comparative analysis: Public administration across the globe. In M. Önder, I. N. Nyadera & M. N. Islam (Eds.), *The Palgrave Handbook of Comparative Public Administration: Concepts and Cases*. Springer Nature Palgrave Macmillan

ÉNA and *École Polytechnique*, which are said to attract the most talented and gifted students (Owen, 2000: 58). The types of examination are classified into external exams, open to anyone fulfilling the requirements (age, nationality, education) and internal exams, for public sector employees who seek promotion and meet the criteria (age, seniority and length of service) (Larat, 2018: 334; UNDPADM, 2006). The civil servant assessment procedure follows Decree 682, on the classification and promotion of civil servants in administrative scales, and it is based on performance and professional development (Eurostat, 2018; Larat, 2018: 335).

It appears from the statistics provided that France's civil service attracts more women than men (Eurostat, 2018):

- At a central level, women represent 50.1% of employees and 16.1% of senior positions.
- At a territorial level, women represent 61% of employees and 18% of senior positions.
- At a hospital level, women represent 76.4% of employees and 37.9% of senior positions.

In France, public personnel work for a wage, and remuneration is based on the employee's grade and the rank of the position occupied. They are also entitled to residence, a family supplement and legal compensation (Eurostat, 2018). Besides, civil servants have the right to strike, can join a union, undertake training, enjoy freedom of opinion. Their duties consist of executing the orders and tasks entrusted to them, professional discretion and informing the public, and professional confidentiality (Eurostat, 2018). Notwithstanding

their rights, all public agents are subject to political neutrality in performing their duties (*devoir de réserve*) (Larat, 2018: 339).

In order to regulate and improve the public service, major regulations were adopted, these include (Larat, 2018: 335–336 and 340):

- **2008:** the bonus system or “Function and Performance Bonus” to link remuneration with responsibilities and individual performance.
- **2009:** law on mobility and professional path to promote “geographical and occupational mobility in the civil service, outplacement and integration of civil servants in jobs unrelated to their previous position”. This law permitted also the integration of part-time jobs, temporary agency staff and recruitment under private law employment contracts at the central and local authorities.
- **2012:** law on civil service on the competency-based selection in the recruitment of civil servants, and public employees having an employment contract (*contractuels*) to become statutory with the administration.
- **2016:** law on civil servants’ ethics by which values of neutrality, integrity, probity and dignity were highlighted for the proper functioning, and a prevention system against conflicts of interests was set up.

8 NGOs/CIVIL SOCIETY

The last few years have witnessed a widespread interdependence between the state and nonprofit organizations. This was largely due to the competition between government’s need to ensure equity and accountability in its spending and the nonprofit organization flexibility and urgent responsiveness to clients’ needs (Brown & Troutt, 2004: 9). As far as the 1830s, Alexis de Tocqueville recognized the expansion of the role performed by associations and nonprofit organizations. The latter have proved their effectiveness in responding to demands of both citizens and the governments by assuming a significant role as a powerful political, intellectual and economic forces enabling citizens to express their collective interests and solve community problems (Smith & Lipsky, 1993). Moreover, the nonprofit sector has tried to find a place in the public sphere whether in partnership with public bodies or within social and solid economy policies “social impact bonds” or as an instrument of social innovation including associations, cooperatives, foundations and social enterprise (Önder, 2006).

France, alongside other countries which are members of the Organization for Economic Co-operation and Development (OECD), has experienced ongoing waves of modernization, privatization and state agentification (Lafarge, 2012: 98). These movements have challenged the sociology of Weberian state functioning in terms of its re-composition (Desmond & Patrick, 2011) and the development of new division of state labor as it was described by Philippe Bezes and Patrick Le Lidec (2016). These changes can

be reflected consequently by the adoption of decentralization, the creation of “Responsibility Centers” and the delegation of Public–Private Partnerships in the process of state disengagement from social policies.

Additionally, French people were historically perceived as hesitant to join nonprofit organizations with the number of foundations per population, and France being the lowest among the OECD countries (Archambault, 2003). The lack of interest by French citizens to join foundations was explained by the historical distrust of French centralized state system toward its competitors (Labor Unions) on the incarnation of “General Will” and the untaxed wealth accumulation. This suspicion began under the *Ancien Régime* which worked on the nationalization of foundations and the abolishment during the French Revolution of all sort of corporation, associations and political clubs whether by decrees (*décret d’Allarde 1791*) or laws (*Loi de Chapelier 1791*) (Doucin, 2005). This phenomenon continued in a narrowed form in the nineteenth and twentieth centuries (Archambault, 2003).

However, since the 1970s, many studies observed the development of the associative life (*le boom associatif*), with the birth of several humanitarian associations and NGOs called “*les sans frontières*” such as *Handicap international-France* (HI-F), *Action contre la faim-France* (ACF-F), *Médecins sans frontières-France* (MSF-F) among others, engaged in international Healthcare and food aid programs (Rayfman, 2013). This phenomenon was also observed at the local level whereby the municipalities were increasingly delegating the management of certain services to NGOs to carry out service delivery to the population on behalf of the local government, and at cheaper cost. This likely made NGOs more popular and visible across the country (Noguès, 2018).

Furthermore, France has lately been inspired by the Big Society social policy adopted by the United Kingdom, as well as the Thousand points of light advanced by the United States. These policies promoted the idea of volunteerism and non-governmental solutions to social innovations (Balazard et al., 2017). While France was for a long time reluctant to adopt New Public Managements (NPM) reforms in the public administration (Lafarge, 2012: 99). Likewise, in order to increase the possibility of integrating the nonprofit sector in public functioning, France sought to develop the flagship of the decentralized policy to build on the Labor government’s attempt to mainstream third-sector provision, to encouraged a variety of private and voluntary sector organizations to prioritize service provision (Lafore, 2010). The reorganization of public functioning and the reforms introduced reflect the state’s ambition in renewing and upscaling the provision of public services (*Renouveau Du Service Public*), while also engaging other actors, and delegate some of the tasks of providing social services to nonprofit actors who contribute to the economies of scale and serve the employment policies (Lafore, 2010).

In the past decades, the various forms of financing and subsidizing the NGOs experienced substantial changes, mainly the voluntary associations

which form the backbone of the nonprofit sector in France (Prouteau & Tchernonog, 2015). In this regard, the public funding of these organizations has traditionally been very important, recognized as the most direct embodiment of the relationship between government and the nonprofit sector. However, since the beginning of the new millennium and particularly after the 2007 financial crisis and the government implementation of budget freeze policies, France has experienced a decrease in public subsidies (Prouteau & Tchernonog, 2017) and remained the lowest in Europe in terms of state-support to association as noted in the *Comité Paritaire de Programmation* report. Bertrand Badie and Marie Claude (cited in Doucin, 2005: 200) pointed out that in countries where historically the state monopolizes the general will, the work of many NGOs is seen as a public service delegation and therefore logically accompanied by public funding mainly in social, culture and medico-social services.

However, the waves of privatization, the influence of the EU reinforced the role of new public management movement in different methods of supporting the NGOs among them, the market-based method based on competition to provide the public services (Prouteau & Tchernonog, 2015: 310), and engaging the private financial resources including donations, members' participation, sale users, thus supporting the increase in the weight of the associative sector in the economy and decrease of the share of public funding. In this regard, Article 1 of Law No. 2003-709 of August 1, 2003 on "philanthropy, associations, and foundations" has strongly contributed to the dissemination of practices of sponsorship among corporate foundations. For instance, an employee creating a corporate foundation, or providing donations can benefit from a tax reduction. It is thus both disengagement and re-engagement that we observed. Between 2005 and 2012, the public subsidies decreased to 3% and the public demands for associations' services increased to 9% during the same period of time.

According to the 17th annual edition of national statistical review titled *La France Associative en Mouvement*, there were between 1.35 and 1.45 million active associations, only 10% employee waged workers, while the number of organizations reached the peak of 72 600 association between 2014 and 2015 (Bazin et al., 2019: 4), with the majority of organizations being involved in recreational activities such as culture 24.1%, sporting 17.1% and leisure 11.07% (Bazin et al., 2019: 9). However, the level of the sector's employment has decreased from 2.6 to 1.8% (4300 employees) in 2018, the first time since 2011. This decrease is largely a result of financial difficulties and absence of funds with 90% of funds being provided by charity foundations. The nonprofit sector contributed one out of every ten sector's jobs added to the French economy. The bulk of this number 57% occurred in the field of health and social actions. Furthermore, 90% of the employees are volunteers with female volunteers forming the majority.

As agreed by Edith Archambault, the French associative model falls under the Mediterranean classification where NGOs remain less developed and weak

compared to its homologues in Europe. The important restrictions, state control over the French associative actions and the limited support schemes are the main challenges of the associative life in France (Balazard et al., 2017: 568).

9 RECENT DEVELOPMENT REFORMS IN PUBLIC ADMINISTRATION

The literature on administrative reforms describes France as a “maintainer of old bureaucracy” and “reluctant to adopt NPM reforms” (Bezes et al., 2013: 165–166; Eymeri-Douzans, 2013: 501; Howarth, 2001: 4–5; Lynn, 2006: 124). This tendency can be explained by the state-centric tradition, the administrative legacy based on legalism and the public interest, the political leadership’s orientations and skepticism that the NPM model influences understanding on values and practices, and challenges the traditionally adopted norms. These factors likely explain the incremental and selective adoption of modernization policy tools as was the case of Mitterrand’s *modernisation de l’administration* (Eymeri-Douzans, 2013: 508).

Notwithstanding this debate, administrative reforms in France were shaped by factors such as globalization, European integration and budgetary tightening. The globalization factor implies that state’s control diminishes in pursuit of an efficient and effective administration. Besides, the EU integration policies impacted institutional structures and French administration. For example, the 1986 Single Act which sets European integration allowed European citizens to join France’s public service (Knapp & Wright, 2006: 296).

Management reforms of the 1980s and 1990s were introduced to modernize and strengthen the local coordination and outreach of departmental decisions. The aim was to provide local authorities with functional independence, target proximity to citizens, and pursue efficient service delivery (Cole, 2005: 108; Knapp & Wright, 2006: 305).

In 1989, the managerial reforms were introduced by the *circulaire Rocard* titled “*Renouveau du service public*”, with particular emphasis on strengthening the executive capacity of field offices, adopting service standards and quality of service based on Total Quality Management techniques, and responsibility centers to improve client orientation and service efficiency (Howarth, 2001: 2; Lynn, 2006: 125; Cole, 2010: 346; Pollitt & Bouckaert, 2011: 274; Lafarge, 2012: 99).

Another “uninterrupted” program since the Fifth Republic was the “*Réforme de l’État et des services publics*” launched in 1995, and piloted by Commissariat for the Reform of the State (CRE), to redefine the role of central government, reform public management, delegate responsibility and position citizens at the center of policy-making (Cole, 2010: 346; Pollitt & Bouckaert, 2011: 274; Eymeri-Douzans, 2013: 509). For instance, the Charter for Public

Services was created in 1992 to digitalized administration and simplify administrative procedures, and One-Stop Shops (*Maisons de services au public*) for citizens to deal with the administration were set (Cole, 2005: 109). In 2019, there were 310 Shops sponsored by local authorities. The primary beneficiaries are the local population living in peri-urban and rural areas (Ministry of Territorial Cohesion & Relations with Local Authorities, 2019).

In 2001, France adopted the organic law relative to finance Acts (LOLF), to improve and rationalize the State's fiscal management on vital sectors such as education, housing, employment, etc. The approach was to replace outdated mechanisms such as input control with performance monitoring mechanisms based on the NPM management techniques. As a consequence, the budget is determined by mission, program and action, based on objectives and performance indicators (Cole, 2010: 350–351; Moretti & Kraan, 2018: 15; Larat, 2018: 332).

In 2007, the General Public Policy Review (RGPP) was adopted in response to state deficit, by downsizing government, reducing public spending and improving performance (Bezes et al., 2013: 169; François, 2010; Simon et al., 2017: 463). This Review also targeted deconcentration in territorial state (RéATE) with the purpose of merging and reducing local services of the State in *départements* and *régions* (Bezes et al., 2013: 161 and 169; Cole, 2011: 393; Eyméri-Douzans, 2013: 514). Likewise, the Decree of the Budgetary and Financial Management of Public Entities (GBCP) was adopted to align the budgetary framework of public bodies with that of the State and facilitate the management of public finances. Similarly, public agencies and local governments are expected to present their budgets based on objectives and performance indicators to monitor their results (Moretti & Kraan, 2018: 16).

In addition, the General Secretary for Government Modernization (SGMAP), under the authority of the Prime Minister, was created in 2012, to fulfill an advisory purpose to the government in “the development, implementation and monitoring of the overall public sector reform program”, and a partnership purpose for public organizations in “implementing reform plans” (Larat, 2018: 333).

On open governance, France created independent administrative bodies such as: (a) the Commission for Access to Administrative Documents (CADA), to ensure free access to administrative documents, public archives and information; and (b) the National Commission for Informatics and Freedoms (CNIL), to prevent abuse of data by administrative authorities, advise government and oversee implementation of laws (Knapp & Wright, 2006: 300; Owen, 2000: 69).

On artificial intelligence (AI), France is dedicating 1.5 billion euros to the development of AI by the end of 2022, including 700 million for research (Van Roy, 2020: 36). These investments target digital literacy, as the government is working on integrating AI and digital curriculum in education and training programs. For instance, *la Grande École du Numérique* was established to assist with the digital training and integration of vulnerable people

to unemployment. Moreover, AI institutions are being founded working on health care, transportation, regional development and environment (Van Roy, 2020: 37).

10 CONCLUSION

This chapter explored the crystallization, aspects, developments and changes of France's public administration. The country's administrative traditions are based on the Napoleonic model, based on both authoritarian administrative bodies, and characterized by the state's centrality and hierarchy. The country's law is based on the continental European rule, where the state is described as an "integrative force" in the society, and this understanding contributed to the rise of *dirigisme*. Besides, the founding principles of *une et indivisible* Republic and the nation's sovereignty influenced the institutional development of agencies. Traditionally, the French Revolution against the archaic institution of the *Ancien Régime* and the Napoleonic legacy has drastically shaped the French political culture and institutions, resulting later in the birth of the Republic. Likewise, the Fifth Constitution strengthened people's sovereignty and determined the interaction between the executive, judiciary and legislative branches of powers. Within different amendment attempts, the executive branch remains the most powerful. The waves of modernization, privatization and Europeanisation have challenged all aspects of political, social and economic dynamism of the French administration with engagement of association and private public partnership and third party in social policies and providing public services. Although France has undergone decentralization reforms, and the central state is redefining its relationship with local governments, reforms did not jeopardize its power. This is manifested in the central state's regulatory and fiscal powers, and its local actors and agencies which play an influential role in policy-making, as highlighted in the interdependent relations between the center and periphery. Considering the elitist bureaucratization and "politics-administration nexus" (Islam et al., 2020; Islam et al., 2021; Nyadera & Islam, 2020) in France, agencies independent of political control were created. Nevertheless, fragmentation, overlapping responsibilities and coordination cost persisted in this case study.

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Federal Republic of Germany

Emrah Ayhan and Nadia Lahdili

I INTRODUCTION

Notwithstanding the religion/political conflicts, wars (including two world wars), and massacres, Germany achieved rapid recovery and growth. There are five significant German historical factors shaping its contemporary administrative traditions. Firstly, Germany has natural borders in the North (North Sea and Baltic Sea) and South (Alps); however, Germany was vulnerable to invasion due to a lack of natural borders in the East and West. The widest borders of Germany were achieved during the 2nd Reich under Bismarck (1871–1918) and the 3rd Reich under Hitler (1933–1945) (Coy, 2011: 185–187).¹ Germany was also divided into East and West from 1949 to 1990 (Winkler, 2018).

Secondly, the lack of natural borders justified a protectionist approach for survival, also known as *Lebensraum* (living space) (Coy, 2011: 184). German

¹ The Word “Reich” is used as national unification with reference to Germany in this chapter.

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leaders have attached great importance to the army, which engendered expansionist policies and a disciplined bureaucracy. Thirdly, denominational conflicts between Catholics (Habsburg Dynasty) and Protestants (Lutheranism by Martin Luther) caused religious wars (1545–1555). Protestants won the war and the Peace of Augsburg was signed in 1555 (Taylor, 2001: 12). Consequently, the local Prince's religion became the religion of the people in his area (Turk, 1999: 48–49). Likewise, the Peace of Westphalia ended the Thirty Years War (1618–1648) (Taylor, 2001: 12–15). This treaty established 350 political units, the modern state system, and the territorial autonomy of German States (Eroğul, 2008). Finally, national unification and continental dominance were achieved four times in German history: the 1st Reich under Frankish King Charlemagne (772–814), the 2nd Reich under Bismarck (1871–1918), the 3rd Reich under Hitler (1933–1945), and the unification of East and West Germany in 1990. Since the 1990s, German has been the EU's second-largest population and the fastest growing economy regionally and globally (Coy, 2011: 233; Karatepe et al., 2014: 15).

The German administrative system combined different models after unification. Similarly, although its economy collapsed after the world wars, Germany has become the leading motor of the European Union (EU) economy, the world's fourth-largest economy (Parlak & Caner, 2005: 144; Bajpai, 2017), and a global leader in electrical equipment manufacturing since the nineteenth century.² The unemployment rate was at 4.2% in 2020 (OECD, 2020), its lowest since 1996.³ Today, Germany is one of the most favorable destinations for migrants, who account for 21.3 million out of a total population of 83.2 million as of 2019 (DESTATIS, 2020).

2 ADMINISTRATIVE HISTORY

Historically, Germany was not a classical constitutional state, but rather was organized according to the federal states' autonomous structures, German identity, stability, and sustainability. For instance, German public administration continued to function despite the national destruction and disaster after the first and second world wars (Seibel, 1996: 74). Therefore, this part evaluates the administrative history in order to understand the sources of the modern administrative system in contemporary Germany.

² Information about Germany's industrial sector can be found at: <https://www.britannica.com/place/Germany/Manufacturing> [07.01.2021].

³ Statistical information about unemployment rate can be found at the official website of Statista (The Statistical Portal): <https://www.statista.com/statistics/227005/unemployment-rate-in-germany/> [10.01.2021].

2.1 *Establishment Period: The 1st Reich Under Charlemagne (Karl Der Grosse)*

Germanic tribes were very influential in the collapse of the Western Roman Empire. Still, interestingly Frankish King Charlemagne (Karl der Grosse) (772–814) was crowned in Rome. He was considered loyal to the Holy Roman Empire in 800. The empire was described by Voltaire as “neither holy, nor Roman, nor an Empire” (Roskin, 2013: 123; Renna, 2015). During the 1st Reich, Germany’s nationalization process had begun when people converted to Christianity and created the German language. Indeed, Germans attempted to establish Christianity as the religion of the Holy Roman Empire, but this attempt failed and caused religious fragmentation of Germanic tribes (Karatepe et al., 2014: 16; Parlak & Caner, 2005: 145–146). As stated initially, these fragmentations resulted in two important wars: the war between Protestants and Catholics (1545–1555) ended by the Peace of Augsburg, and Thirty Years war (1618–1648) ended by the Peace of Westphalia (Coy, 2011: 73–88; Taylor, 2001: 2–16).

3 IMPERIAL PERIOD: THE 2ND REICH UNDER PRUSSIA

The operations of Napoleon in Europe and especially in Germany (1799–1815) reduced the number of German states (Länder) into 35 sovereign states and four autonomous cities (Hamburg, Bremen, Lübeck, and Frankfurt) united under the German Confederation in 1815 (Coy, 2011: 116; Turk, 1999: 11). The economic and political integration of these monarchical states and autonomous cities after 1815 provided a stable and sustainable administration for the new German Empire composed of 25 federal units in 1871 (Karatepe et al., 2014: 17). Therefore, the real national unity, the 2nd Reich, was achieved in 1871 during Prussian King Wilhelm I and Prime Minister Otto von Bismarck’s rule (1871–1890) (Coy, 2011: 126–127). Under the new Empire, the autonomy of the German Länder was protected. The King of the Prussian State was regarded as German Emperor (*Kaiser*) while the Prime Minister was called the German Chancellor (*Kanzler*) (Çam, 1982: 264). The new Empire was a militaristic and economic state which achieved stable and sustainable development until World War I (James, 1989). From 1871 to 1918, the power of the Reichstag was limited while the Prime Minister acquired stronger powers. For instance, Bismarck could appoint his own ministers while Reichstag could only approve or reject the budget. Bismarck, a Realpolitik practitioner, used his powers to pursue expansionist policies toward establishing national unification. Hereafter, Bismarck turned to stability and sustainability policies to protect national unity (Coy, 2011: 129–146). When Bismarck retired in 1890, German foreign policy turned to expansionist and imperialist policies to compete with other European powers and dominate inside and outside Europe (Coy, 2011; Roskin, 2013: 131). These policies engendered World War I between Germany and other global powers. Germany

lost the war and signed the Treaty of Versailles. The new Empire eventually collapsed, and the Weimar Republic was established in 1919 (Coy, 2011: 170–172).

3.1 *Weimar Republic*

Germany was defeated in World War I, and western powers created a constitutional assembly consisting of the Social Democratic Party, the Catholic Central Party, and the Democratic Party. This assembly had to establish a constitutional republic in 1919 in Weimar town (Coy, 2011: 172–176). The Weimar constitution was a progressive document providing citizenship and political rights as well as direct and representative democracy (Achilles, 2010: 669–670; Coy, 2011: 173; Turk, 1999: 102). The Weimar Republic was described as a republic without republicans and a democracy without democrats (Achilles, 2010: 668). Nevertheless, the socio-economic and political conditions during the post-war era hindered the sustainability of the democratic system. Firstly, the Treaty of Versailles caused a great debt for Germans, territorial loss (especially Alsace and Polish Corridor), and revenge (Taylor, 2001: 219–222; Turk, 1999: 100–102). The majority of Germans considered the Treaty a humiliation and an economic burden for Germany (Coy, 2011: 172). Secondly, the Weimar Republic did not bring political stability because 26 cabinets changed in only 14 years during the 1920s (Roskin, 2013: 132). The President's power relations, the Prime Minister, and the Parliament were not determined in the constitution. For instance, Article 48 provided the President extraordinary authority to solve political problems and gave him emergency powers to suspend the legislature and govern by decree (Coy, 2011: 173; Turk, 1999: 103), but this authority caused political crises between the President and the Prime Minister (Çam, 1982: 268). Thirdly, economic problems like hyperinflation, poverty, instability, unemployment, radicalism, and the Great Depression in 1929 increased the National Socialist German Workers' Party's influence under Hitler's rule (Coy, 2011: 176; Muratoğlu, 2014; Taylor, 2001: 240). The appointment of Hitler as Chancellor by President Hindenburg in 1933 was considered the Weimar Republic's death (Turk, 1999: 107–108).

3.2 *Nazi Regime: The 3rd Reich*

Hitler benefited from the deteriorating conditions during Weimar Republic and increased his votes from 3.5% in 1928 to more than 34% in 1932 (Coy, 2011: 178; Uzun, 2003: 647). When Hitler came to power in 1933 and held a two-thirds majority in parliament, he did not favor state ownership of industries like the communist party in the Soviet Union. Instead, he favored an economy under party supervision and so German workers had to work on government projects like highways (Roskin, 2013: 134). His national-socialist ideas were based on the German race's superiority (Aryan) and anti-Semitism (Coy, 2011: 180; Turk, 1999: 108–109). Jewish massacres were carried out

during the Nazi regime (Aykaç & Altunok, 2014). He followed a three-step foreign policy: relief from the conditions of the Treaty of Versailles, consolidation of Germans under a single state roof, and the capture of world sovereignty (Coy, 2011: 182–194; Taylor, 2001: 253–265). By establishing the Enabling Act of 1933, Hitler eliminated democratically elected political parties and associations, neutralized the church and nobles, and established fascism in Germany (Coy, 2011: 182; Karatepe et al., 2014: 18). With the death of President Hindenburg in 1934, Hitler became both Prime Minister and President. The 3rd Reich, under the leadership of Hitler, re-established centralization over the German States. In this period, he first absorbed the Saar in 1935, Austria and the Sudetenland in 1938, and Czech lands in 1939 without fighting (Roskin, 2013: 135). However, his invasion of Poland in 1939 resulted in the declaration of war by France and the United Kingdom (UK) against Germany. This was the beginning of World War II, which caused millions of deaths across the world, and resulted in lost national unity for Germany once again (Taylor, 2001: 266–268; Coy, 2011: 194–196).

3.3 *Post-War Period*

After World War II, Germany was occupied and divided into four zones controlled by the Soviet Union, the United States (US), the United Kingdom, and France at the Potsdam Conference in 1945. This also marked the beginning of the Cold War rivalry between the Soviet Union and the United States. While Western powers established the Federal Republic of Germany on May 23, 1949, as a western block, the Soviet Union established the German Democratic Republic on October 7, 1949 (Coy, 2011: 197–204). After the Berlin Wall was removed on November 9, 1989, East and West Germany were united by the Unification Treaty on October 3, 1990. This resulted in a united Germany composed of 16 German States, namely the Federal Republic of Germany, with its capital in Berlin (Aykaç & Altunok, 2014). It can be noted that European powers often demanded a federal Germany under their control, because they believed that unitary structure (as in the Nazi regime) can result in a very strong German state seeking expansionist and aggressive foreign policy again.

3.4 *Sources of Political Culture in Germany*

After reviewing these five periods as the basis of the German administrative system, it is also important to evaluate political culture sources. During the Imperial Period, Prussia defeated Denmark in 1864, Austria in 1866, and France in 1870 (Coy, 2011: 130–139). Bismarck consolidated the German States under Prussian control in 1871; eventually, he favored national unity and stability rather than previous national expansionist policies. Prussia attached great importance to a strong army, as Voltaire claims that “Prussia is not a country with an army but an army with a country” (Roskin, 2013:

126–130). After Prussia expanded its borders, a new noble class “Junker,” who played an important role in developing the Prussian state, emerged. The Junkers were appointed to all levels of bureaucratic and military positions and were loyal to the state (Coy, 2011: 129; Karatepe et al., 2014: 16). The Junkers were believed to be highly disciplined, obedient, and respectful to the state, which is still evident in Germany’s contemporary political culture. Hanna Schissler (1991: 101) argues that Prussian Junkers represented the authoritarian, anti-liberal, and pre-fascist social class which maintained its dominance until the twentieth century. Hence, liberalism and democracy did not emerge in Germany until the Junkers’ disappearance as a social class after World War II. For instance, liberals were dismissed from the Frankfurt Cathedral, and they were humiliated by Bismarck in 1849 (Roskin, 2013: 146). Besides, the democratic experience in the Weimar Republic failed because liberals were a minority again. The authoritarian rule has continued in East Germany until it united with West Germany in 1990. Therefore, democracy was rather imposed by World War II winners instead of being an evolutionary process in Germany. Today, Germany is considered a good democracy even though there are still discussions about the democratic rights of immigrants and refugees (Ayhan & Önder, 2016).

4 LEGAL STRUCTURE

The main principles of the rule of law were established in Weimar constitution, in which the legislative function was carried out by the “national council” and the “assembly of federal units,” while executive functions were shared between the President and the Council of Ministers. However, as argued above, the Weimar Republic and its constitution did not bring political stability and sustainability due to a lack of unity, integrity, and precision, since its articles combined different constitutions throughout the world. The executive and legislative’s power relations were not determined, so the executive became more dominant over the legislative. This relates particularly with Article 48 which provided the President with the extraordinary authority to suspend the legislature, govern by decree, and take emergency measures without getting the consent of the legislature under certain conditions (Çam, 1982: 268; Coy, 2011: 173; Turk, 1999: 103).

4.1 *Basic Law: Rule of Law*

World War II winners established the Federal Republic of Germany and drafted the Basic Law by taking some elements from the 1848–1849 Frankfurt constitution and the 1919 Weimar constitution (Behnke & Kropp, 2021: 36; Roskin, 2013: 136). The Basic Law was imposed by the founders of the Federal Republic of Germany in 1949 against Germany’s centralized and unitary structure as it was during the Nazi Regime (Coy, 2011: 203). Yet, it brought democracy, national unity, economic and political stability, and

sustainability (Winkler, 2018). It is based on five basic principles: federalism, republic, democracy, social state, separation of powers, and rule of law. Hence, as the highest source of law, the Basic Law aimed to establish a real democracy and democratic institutions (European Commission, 2020). This constitution contains 141 Articles stipulating the basic rights, the compositions, functions and duties of the Federation and the German States, and the execution of federal laws and the federal administration, etc. (Federal Ministry of Justice & Consumer Protection, 2019).

4.2 *Federalism in Germany*

Germany is a social federal republican state with an elected Federal President. The Constitution defines democracy as a form of government, and the foundation of state is based on the principle of people's sovereignty. This sovereignty belongs entirely to the people who exercise their sovereignty through elections, votes, and by special organs empowered with legislative, executive and judicial powers (Federal Ministry of Justice & Consumer Protection, 2019). The execution of this sovereignty depends on the separation of powers. Law in state affairs is superior and the executive authority shall not be in any activity contrary to the law and the constitution. The federal government shares its powers with German States, who have their own governments and parliaments based on the principle of decentralization of power (Behnke & Kropp, 2021: 39; European Commission, 2020; Turk, 1999: 11). These States, for instance, have the authority to organize their educational policies within the general framework of the Basic Law. Therefore, the central government and federal government need to work in harmony.

4.3 *Administrative Judicial System*

The German administrative system is divided into the federal state and the states, with their own legislative, executive, and judicial bodies. Its court system is divided into two levels. Firstly, the Constitutional Court is the "Supreme Court" at the federal level and it deals with judicial review and constitutional matters. It is divided into ordinary courts dealing with criminal, civil, and family cases. In addition, specialized courts deal with administrative law jurisdictions (Administrative Federal Court), labor disputes, and employment contracts (Labor Federal Court), social security disputes (Social Federal Court), and fiscal and taxations matters (Finance Federal Court) (Turk, 1999: 8–9). On the other hand, there are courts at the state level. They operate with jurisdictions corresponding to those of the federal courts. There is a hierarchical structure between lower- and upper-level courts in the German judicial system based on federal structure. For example, Federal Court of Justice is the supreme court over the following courts from highest to lowest: Higher Regional Courts (appeal), Regional Courts (trial and appeal), and Local Courts (trial). Similarly, administrative courts also have similar structure.

They are ordered from highest to lowest level as Federal Administrative Court (appeal on the point of law only), Higher Administrative Court (appeal), and Administrative Courts.

4.4 *Political Parties and Party System*

It is debatable whether the German party system is a two-party system or not, since the Christian Democratic Union (CDU) and the Christian Social Union (CSU) are two closely allied parties (Auel, 2014: 430–431; Ayhan & Önder, 2016: 28; Pollitt & Bouckaert, 2011: 279). Jean Blondel (1968) argued that the CDU and the CSU should be considered as one party, because the CSU is active in Bavaria while the CDU is active in the rest of Germany, so they do not compete for votes (Lijphardt, 2012: 68). On the other hand, Manfred G. Schmidt (1996: 95) discussed how the German party system was mainly structured until the mid-1990s around three major parties i.e., the CDU-CSU as one party, the Social Democratic Party of Germany (SPD) and the Liberals. Depending on different ideas, Germany's party system is between one party and two other parties (Auel, 2014: 431–432; Turk, 1999: 9–10).

Coalitions have always ruled Germany since the first democratic election held in 1949. Between 1949 and 2015, Prime Ministers from the CDU ruled the country for 48 years while Prime Ministers from the SPD ruled for 20 years (DIAM, 2015). The CDU politician Angela Merkel is the Federal Chancellor/Prime Minister in a coalition (CDU/CSU and SPD) since 2005 (European Commission, 2020). There are also some other parties which have joined the government in different periods: Alliance 90/The Greens, the German Party and the Free Democrat Party (Ayhan & Önder, 2016: 28; Turk, 1999: 9–10).

5 CENTRAL GOVERNMENT

At the heart of German federalism, there are centuries-old princes and states, so the political union is perceived as a federal identity. The federal system was interrupted during the Nazi period but resumed after 1945. In its federal structure, each of the German States has its own constitution, legislative, executive, and judicial bodies (European Commission, 2020; Wegrich & Hammerschmid, 2018: 361). While the federal government is strong in legislation, German states are powerful in executive areas (Behnke & Kropp, 2021: 35; Can, 2004).

German federalism has some basic characteristics:

- Federal states adopt principles of republic, democracy, and social law guaranteed by the constitution.
- State governments and parliaments use their powers in areas in which the federal state cannot intervene.

- States have fiscal autonomy within specific metrics and limits. For instance, they levy taxes, collect, and manage their budget.
- Each state may make laws and enactments by using its own autonomous legislative authority.
- States are obliged to apply federal law together with state law.

The federal state and the states cooperate closely; central and local authorities respect each other's authorities and act together in their political attitudes and practices. In this sense, the main character of German public administration is shaped by the principles of federalism and decentralization and is divided into the following:

- Federal Administration
- Federal State Administrations
- Regional Administrations
- Districts
- Autonomous Cities
- Municipalities

5.1 *Scope of Central Administration*

There are five basic constitutional institutions in Germany, shown in Table 1.

The constitutional principles mainly influence the German administrative system. The public administration structure can be evaluated under three sections: Federal Administration, Federal State Administrations, and Local Administrations. Germany's institutions are based on a Federal State Administration but at the same a time parliamentary regime similar to the British political system (Büyük Larousse, 1986: 442). On the other hand, the state is based on five main principles: republic, democracy, federalism, constitutional state, and social state.

5.2 *Administrative Position of Head of State*

The executive power is shared between Federal President and Federal Government. The President is politically not liable, because he has limited and symbolic powers, while the latter is politically responsible because it has the real political power. The President is determined by a joint council between the Federal Parliament and the Local Parliaments. The Federal President is elected by the Federal Convention for 5 years (maximum two terms) from inside or outside of parliament, and he should be at least 40 years old (European Commission, 2020; Muratoğlu, 2014). Unless one of the candidates gets the votes of an absolute majority in the Parliament, second ballot elections are held. If no candidate gets the majority of votes, third ballot elections are held based on simple majority rule.

Table 1 Constitutional institutions and their functions

<i>Constitutional institutions</i>		<i>Functions</i>
Legislature (Bicameral)	Federal Parliament	Elected representative assembly First chamber of the parliament 656 members which are elected for 4 years It appoints Federal President and approves international treaties, etc.
	Federal Council	Appointed representative assembly Second chamber of the parliament 68 representatives of 16 German States which are appointed by federal governments Elected for 4 years It attends legislation and execution processes
Executive (Federalism)	Federal President	The Head of the State
	Federal Government	It is formed by the Federal Chancellor and the Federal Ministers
Judiciary	Federal Constitutional Court	The highest court It solves conflicts between federal and local governments, and monitors rules, regulations, and law of the Basic Law There are also Court of Auditors, Court of Appeal, Council of State, Labor Court, and Social Court

Source Authors' Compilation

The President's duties and authorities are determined according to a parliamentary system that gives actual power to the Prime Minister and his government. This is because of the Weimer Republic and Nazi regime's experiences—when political crises occurred due to extraordinary duties and authorities of the President and dominance of the executive over the legislative. There are some major tasks of the Federal President.⁴

- representing the Federal Republic of Germany for international law;
- concluding treaties with foreign states;
- proposing the Federal Chancellor;
- appointing and dismissing the Federal Chancellor and Federal Ministers;
- dissolving the Bundestag, and certifying (signing) and promulgating laws;

⁴ Detailed information about the tasks of Federal President can be found at the official website of the Presidency: <http://www.bundespraesident.de/EN/Role-and-Functions/ConstitutionalBasis/ConstitutionalBasis-node.html> [09.01.2021].

- appointing and dismissing federal judges, federal civil servants, and commissioned and non-commissioned officers of the Armed Forces.

The Federal President also has duties and authorities provided by the parliamentary regime, so he does not have some major authorities in presidential systems, such as supreme military command and chairing the cabinet. In addition, the Federal Constitutional Court can grant dismissal by two/third of the members in one of the legislative branches admitting the President's guilt.

5.3 *Federal Government*

The Federal Government comprises of the Federal Prime Minister and Federal Ministers. The Federal President's power is weak while Chancellor's (Prime Minister) power is strong (Karatepe et al., 2014: 25). Moreover, the Chancellor has the highest political power compared to ministers, because they get the majority of the votes in the Federal Parliament. The President can appoint the Chancellor if they hold the majority of votes in the Federal Parliament. If this candidate cannot win the vote of confidence, a new Prime Minister is selected within 14 days. However, if the new candidate cannot get the vote of confidence in the Federal Parliament, the President can appoint another candidate who holds the relative majority, or they can dissolve the parliament (Aykaç & Altunok, 2014). In order to provide sustainability and stability, the establishment of a government or a government's fall can only be ensured by the majority of votes in parliament.

Konrad Adenauer (1949–1963), one of the chief Chancellors in German political history, established a strong legacy, because he stretched the new constitution to its limits. He made the position of German Prime Minister as strong as the British Prime Minister through his political actions such as the formulation of the CDU, consolidation of the “two-plus” party system, obtaining membership of NATO and the EU, and establishing a close alliance with France (Coy, 2011: 208–212; Roskin, 2013: 137). Since then, the Chancellors' position has been stable and durable, because they have always ruled the country until the end of their ruling term. Some of them have even ruled more than one term. For instance, Angela Merkel has been ruling the country as Chancellor since 2005 (Ayhan & Önder, 2016: 28; European Commission, 2020; Roskin, 2013: 137).

The Chancellor (Prime Minister) takes joint action with the ministers who have an area of autonomy and responsibilities in their ministries. They are determined by the Chancellor and appointed by the President. The Chancellor and ministers can also be member(s) in the Federal Parliament. If there is a coalition government, the Chancellor should act with consensus and responsibility to avoid political crises with other parties. They can first determine or change the ministers and can reduce or increase the number of ministries. There are 14 ministries in the Federal Government today with high managerial autonomy (Fleischer, 2021: 66–67; Karatepe et al., 2014: 25;

Wegrich & Hammerschmid, 2018: 364). Like other European countries, the number of ministries changes from cabinet to cabinet in Germany. There are three main principles in the “Basic Law” which brings cooperation and adaptation between the cabinet members. These are: “the politics of the Prime Minister are guidance for Ministries,” “common decision should be taken in the cabinet,” and “autonomy of Ministries should be guaranteed” (Fleischer, 2021: 71–74; Karatepe et al., 2014: 26; Wegrich & Hammerschmid, 2018: 364–365). The first principle enforces the Prime Minister’s durable and strong position to establish more effective and decisive government policies. The second principle ensures that the decisions are taken more democratically and accurately. The third principle guarantees that the Prime Minister can provide more efficient and effective public service autonomously within his responsibility area.

5.4 *Local Organizations of Federal Government & Independent Agencies*

The public service is provided by central administration through federal public institutions and this is known as “Direct Federal Administration” (Karatepe et al., 2014: 26). These institutions are the highest federal units, such as Federal Government, Federal Court of Auditing, and the Central Bank. They act independently nation-wide and are mainly concerned with management of economic and transportation administration. These institutions have single authority in their area of responsibility and have no provincial organizations. Other institutions, which depend on state control and have legal and organizational autonomy, include the Federal Cartel Office, Federal Statistical Office, Federal Criminal Police Office and German Patent, and Trademark Office.

6 LOCAL GOVERNMENTS

In German federal structure, there are three levels of management: federal, state, and local governments. According to the Constitution, federal state’s weight is concentrated in the executive while policy execution is mostly carried out by the states and local governments. Regulations on local administrative systems are in the hands of the German States (Behnke & Kropp, 2021: 38–39; Wegrich & Hammerschmid, 2018: 374–375). For this reason, different local governance systems emerged in Germany. Local authorities have two basic characteristics. The first is a strong local government supported by tradition, democratic values, constitutional and legal rules. The second characteristic is that there is not a single type of local government in the whole country. The autonomy of local governments has been secured by the constitution. For instance, Articles 28, 106, and 107 include basic regulations on local governments (Behnke & Kropp, 2021: 38–41; European Commission, 2020; Ruge & Ritgen, 2021: 131–133).

6.1 *Scope of Local Governments*

The adaptation and harmonization of centralization and localization are unique features of German political and administrative structure (Bağlı, 2011: 44–48; Behnke & Kropp, 2021: 37–41). Germany gained federal structure after independent federal states were united in 1871. The Basic Law set up the current federal system in 1949, and it was reformed in 2006 and 2009 (*Föderalismusreform I and II*) on the basis of the cooperative federalism principle (OECD, 2016: 126–127; Pollitt & Bouckaert, 2011: 284). The local governments are the main bases of German federal structure due to the major principles of decentralization, subsidiarity, and local self-determination (Akın, 2009: 431–437). Therefore, compared to the United States, Germany is more federal because its states have more authority over their own affairs and get more taxes than American states.

As shown in Table 2, local governments have financial and administrative autonomy to conduct their own affairs, carry out their policies, collect taxes, or make other financial arrangements to create their own budget. Considering their diversity and number of duties, German states have direct access to the federal tax system, which provides them great financial autonomy. Nevertheless, they must cooperate with the Federal Government in their work. The Federal Government cannot intervene in areas where they are authorized in the states (Aykaç & Altunok, 2014). For instance, Berlin and other German states share the same portion of individual and corporate income taxes by 42.5%, while local governments receive the rest of the taxes by 15%. On the other hand, German states have 45.9% of the value-added tax known as sales tax used throughout Europe (Roskin, 2013: 161). In addition, after unification, the states in the East Germany received additional financial support. Aid and annual west-to-east budget transfers accounted for 85 billion euro which is 4 to 5% of West German GDP during the 2000s (European Commission, 2005: 30; OECD, 2004: 31).

Table 2 Administrative and financial autonomy of the local governments

Autonomy right for public personnel	They can choose, appoint, improve, and dismiss their personnel
Organizational Autonomy Right	They can arrange their administrative structure
Planning Autonomy Right	They can make zoning and land use planning to arrange and structure city area
Legal Arrangement Autonomy Right	They can create local rules, regulations, and legal documents
Financial Autonomy Right	They can execute their income and expenses under their own responsibility
Tax Autonomy Right	They can impose tax and determine tax rates

Source (Aykaç & Altunok, 2014)

Local government associations have the right to operate in matters dealing with their duties within legal regulations. Assurance of local government assets also includes the right to own resources. Articles 105, 106, 107, 108, 109 of the Federal Constitution regulate the distribution of powers regarding taxation and financial distribution between the federal state, the states, and the local governments. Accordingly, the municipalities share a certain amount of income. Detailed regulation in this regard is governed by a Federal Law that shall enter into force upon the Federal Senate's approval, in which the states are represented.

6.2 *Local Administrative Units*

The traditional German local administrations date back to the eleventh century when cities were established. Local administrations were created by local administration law, which was implemented in 1808 (Akin, 2009: 431). During the Nazi regime, the Local Government Law of 1935 interrupted the traditional structure of local administration in Germany, because it restricted and decreased local administrations' autonomy and responsibilities. This situation was fixed after 1945 by new legislation. Until 1990, West Germany had established new legislation to decrease the number of municipalities and districts, while East Germany had increased the number of municipalities. However, the number of municipalities was also decreased in East Germany from 7,843 to 3,014 after the unification (Karatepe et al., 2014: 35). Local governments can be divided into three levels of organization. Depending on this, there are 11,092 municipalities (average population 7320 people) at the municipal level, 402 Districts at the intermediate level, 16 German States at the regional level (OECD, 2016: 126). Moreover, except from city-states (Berlin, Bremen and Hamburg), other federal states are divided into cities and rural regions (Frankfurter Societats-Medien GmbH, 2011a).

The change of political systems of local administrations depends on global developments. For instance, the revival of neo-liberal policies in the world influenced German local administrations by requiring privatization of public goods and services. Currently, the tasks of local administrations are complex. First, they hold local authority and are responsible to provide goods and services within their borders. Second, they act as provincial organizations of the federal states. Third, they execute new federal and EU laws at the local level (Derlien, 2003: 98; Hoffmann-Martinot & Wollmann, 2006: 22; Pollitt & Bouckaert, 2011; Wegrich & Hammerschmid, 2018). On the other hand, local administrations are politically strong because citizens have opportunities to influence decision-making processes through forms of participatory democracy such as referendums and CSOs (Ruge & Ritgen, 2021: 135; Wegrich & Hammerschmid, 2018: 376). If the central government interrupts the functions or rights of local administrations, they can apply to federal or local courts of justice (Karatepe et al., 2014: 34–35).

There are hierarchically four stages in the administrative subdivision of Germany: the level of the Federal Republic of Germany (Bund), the level of the 16 Federal States, the level of Governmental Districts, and the level of Rural Districts and Urban Districts. Rural Districts are also divided into two: (1) collective municipalities and municipality, and (2) municipalities. In this structure, municipalities are at the lowest level of administrative subdivision of Germany. Urban districts have the highest degree of autonomy.

Each Federal State has its own administrative structure depending on historical processes. Each district and municipality are independent public entities in their own right and the elected people directly manage these entities (Schrappner, 2021: 113–114). There is no hierarchical relationship between them, but there is a division of duty and collaboration. In this context, the districts fulfill two separate functions. Firstly, the districts contribute to balanced development by trying to discredit the division of power between the municipalities through financial support. Secondly, they fulfill the duties that municipalities cannot do due to lack of power.

Municipalities in the district system are the main decision-makers with full authority. If a municipal administration does not have the necessary financial resources to provide goods and services, district administration gets the authority. Municipalities and districts use their authority mainly in the areas of transportation, watercourse, electricity and gas production, waste management, and planning (Frankfurter Societats-Medien GmbH, 2011b; Wollmann, 2014; Löffler, n.d). It is also important to note that neighboring municipalities can collaborate with private organizations to provide goods and services.

The Urban Districts are generally large cities with more than 100.000 population and are controlled by governors, not central administration (Karatepe et al., 2014: 37). On the other hand, Rural Districts are local administrations established by integration of some small municipalities. They provide goods and services within areas where municipalities cannot provide them, such as in rural areas at the urban level.

In Germany, Urban and Rural Districts are local government units. They also perform some services as part of the central government. The services that municipalities cannot fulfill within their borders and the districts' quality services are fulfilled by the districts. Local administrations are responsible for motorways, traffic, education, culture, schools, public security, social provisions, library, dormitories, electricity, gas production, etc. (Löffler, n.d.: 5–9). However, with the rise of new public management reforms and resource scarcity, many local administrations are currently cooperating with private firms and organizations in providing public goods and services. The district's basic organs are the district council and the district governor. In some states, there is a district commission (Karaer, 1989: 26). Districts that stretch back for centuries in Germany are connected to 99% of these municipalities. On the other hand, the cities that are not affiliated with the districts are independent

cities whose management is performed by both central and local administrations. However, the district fulfills its central government duties on behalf of many municipalities.

7 CENTRAL-LOCAL GOVERNMENT RELATIONS

In Germany, the central-local government relation is decentralized, consensus-oriented, and based on coordination. Policies are determined by the Federal Government and executed by local governments, which hold administrative authority in taking collaborative action with federal units within their borders (Articles 30 and 70 of the Basic Law) (Pollitt & Bouckaert, 2011: 282; Schrapper, 2021: 105). The authority's share is enacted by law, so there is no conflict of authority between the federal and local governments. The level of power distribution between the three levels of government is shown in Table 3. The federal structure restricts authority misuse between the federal and local governments and involves the opposition in local parliaments against the ruling party(ies) in the Federal Government (Anheier & Seibel, 2001: 32–33). Besides, the administrative authority of local governments and parliaments engenders a competition between local units, which consequently results in better public services and goods.

German states participate in the federal level's legislation through the Federal Council, consisting of 68 non-elected members, like local governments' representatives. Each federal state has right to send 3 to 6 members to the Federal Council depending on their population. Unlike federal states like the United States and Switzerland, local administration in German federal states is the major answering authority to citizens based on decentralization principle (Batal, 2010; Schrapper, 2021: 106). This practice strengthens the democratic process at the local level. The tasks of federal states are determined in the Constitution. German states have their own constitution, executive, legislative, and judiciary organs and are financially autonomous (e.g., tax & budget) to provide goods and services (Federal Ministry of Justice & Consumer Protection, 2019; Karatepe et al., 2014: 28–29).

According to Articles 73 and 74, civil defense, foreign politics, diplomacy, monetary policy, policies on naturalization, railways, communication, and

Table 3 The level of power distribution in the German administrative system

<i>Level of government</i>	<i>Legislation</i>	<i>Regulation</i>	<i>Provision</i>
Central/Federal Government	high	high	low
State/Regional Government	low	low	high
Local Government	low	low	high

Source (Wegrich & Hammerschmid, 2018: 361–363)

customs are handled by the Federal government (Turk, 1999: 8). While federal and local parliaments handle residence permission of immigrants, marriage services, associational operations, freedom of assembly and demonstration, and the production and usage of nuclear energy. Federal states do not act in contradiction to federal laws in the areas where they have autonomy and authority. If the Federal Government makes law in areas under common responsibility, this law supersedes local law.

The 2006 Reform (*Föderalismusreform I*) stipulates the central government and federal states' responsibilities (OECD, 2016: 126–127). Similarly, German states have right to make law and administrative arrangements in areas where Federal Government does not have authority. This type of separation prohibits abuse of authority and provides check and balance between federal and local governments. For instance, federal laws that are adopted by the Federal Parliament should also be approved by the Federal Council. This balance of legislative organization aims to protect the federal states' interests.

In 2006, Germany decreased the power of the Federal Council in legislation process, and new regulations increased decentralization. For instance, the Federal Parliament gained large authority in legislation by deactivating the Federal Council in the legislation process. Previously, the percentage of draft laws that needed Federal Council approval was 60%, but this proportion was decreased to 35–40%. Some argue that this kind of regulation enforces centralization in legislation, instead of decentralization (Akin, 2009: 430–432).

In Germany, there are two types of auditing: internal auditing and judicial review. Local administrations are under auditing of federal states, and the form of auditing depends on the nature of local services (Hoffmann-Martinot & Wollmann, 2006: 22). Whereas local governments can only conduct legal compliance checks on their local government duties. There are both legal compliance and appropriateness supervision in the duties handed to the local administrations by state order. The audits conducted on the municipal planning activities shall comply with the nature of the duty and the law. Nevertheless, the guardianship authorities on both natural and conservation-related duties will conduct both legal and casualty checks. Besides, the Federal Government has the legal right for judicial review on local administrations to monitor whether local administrations' actions are in accordance with regulations or not (Wegrich & Hammerschmid, 2018: 366). The guardianship authorities' supervision does not aim to limit the autonomy of local authorities but to ensure the legitimacy of the actions of the local authorities.

8 PUBLIC PERSONNEL SYSTEM

German civil service is characterized by bureaucratization. Routine work is performed in sub-units, whereas training and examination are pivotal in civil service regulations and policies (Reichard & Schröter, 2021: 215–216). The public personnel system is protected against conflicts between federal and

local governments, as both governments can pass civil service legislation. The central government passes legislation on federal civil servants' status, rights, and obligations at state and local levels. For instance, central government adopted the Act on the Status of Civil Servants in 2008 (Federal Ministry of Interior, 2014: 38). The upper- and middle-level officials can neither become member of a political party, nor influence elections. Besides, it is forbidden to disclose the views of parties in the workplace. This system encourages an effective, developmental, and cooperative public sector (Akin, 2009: 444; Dickman, 2003: 267).

8.1 *Overview of Public Personnel System*

The formalization of appointing civil servants began after the 1650 s, but the recruitment of specialized and skilled civil servants started during Frederick Wilhelm I (Karatepe et al., 2014: 44–45). The contemporary system underestimates values, such as nobility and military status, while promoting merit-based principle (Mooers, 2000: 145). In the eighteenth century, the merit system was embedded into the personnel system (Wegrich & Hammerschmid, 2018: 367–368). In this sense, Prussian public officials were appointed based on their talents and expertise (Poggi, 2007: 68). The first official document promoting civil servants' rights is the Weimar constitution of 1919 (Derlien, 1987: 97), as Article 130 states that “Civil servants are servants of society, not of a party” (Federal Ministry of Interior, 2014: 38). However, these rights were interrupted during the Nazi regime (1933–1945).

The status and principles of public officials are determined by federal governments (Articles 33(4) and 33(5) of the Basic Law) (Battis, 2013: 157; Kuhlmann & Röber, 2006: 90; Reichard & Schröter, 2021: 212; Wegrich & Hammerschmid, 2018: 367–370). Furthermore, public personnel are the main actors to adapt and execute policy changes. Hence, German public administration should necessarily respond to recent conditions, such as the need for qualified staff, performance-related issues, increasing demands of the people, the aging problem, unnecessary administrative burdens, and technological and socio-economic changes (e.g., aging and youth unemployment).

8.2 *Administrative Techniques in Public Personnel System*

Germany's public personnel system is based on neutrality, expertise, professional performance, and loyalty to the Constitution (Battis, 2013: 157). This system is divided into civil servants (*Beamte*), contract workers, (*Angestellte*), and manual workers (*Arbeiter*) (Kuhlmann & Röber, 2006: 90). Civil servants work in basic tax administration duties, while contractors and workers are employed in health, social services and technical work. The government can also appoint contracted personnel and workers for civil servant positions. Nevertheless, civil servants cannot occupy the position of contracted personnel or workers (Federal Ministry of Interior, 2012).

Although Article 33(2) of the Basic Law states that “Every German shall be equally eligible for any public office according to his aptitude, qualifications and professional achievements,” there are some criteria to be employed in public institutions, such as loyalty to the Basic Law, personal integrity, education, and citizenship. The level of education according to career structures is:

- Minimum basic-medium level education for simple service class,
- Medium-secondary level education for middle-level service class,
- Entering college for the upper-middle level service class,
- Successful completion of college is required for the upper-level class.

Applicants from the EU, Iceland, Liechtenstein, Norway, and Switzerland (if they hold the necessary qualifications) can join the German public service (Article 116 of the Basic Law). However, certain positions in the German public service are exclusive to nationals due to their specific content (Federal Ministry of Interior, 2014: 41).

Although ascendancy through the civil service classes is not possible, it is possible to pass the examination after the progress training. There are exams for entrance to the civil service and they are announced publicly to provide equal access to German public service. Each authority determines its own selection process in the recruitment and hiring processes. The suitable candidates are selected for the vacant positions. Those who succeed in the selection process enter a new test after three-year-internship period, and they begin as a noble civil servant, upon succeeding in this exam (Muratoğlu, 2014). On the other hand, penalties for civil servants’ disciplinary offenses are regulated by law. When necessary, the administration decides whether to initiate disciplinary measures at its own discretion or not. Disciplinary actions are as follows (Federal Ministry of Interior, 2014: 49):

- Reprimand and monetary penalty,
- Salary cut,
- Dismissal from office,
- Appointment of a relative in the same career with a low salary,
- Reduction of retirement pension for pensioners,
- Deprivation of retirement.

The administrative superior imposes reprimands and monetary penalties from these disciplinary measures, but other penalties depend on the decision of the responsible court. In general, civil servants have the right to financial security, the right to work in a healthy environment, and the right to in-service training. However, civil servants have the right to receive care in salary form from the government due to the maintenance principle. In addition, civil servants have rights of sickness, birth and death assistance to ensure

prosperity, annual leave, excuse entitlement, and the right to use the official title (Karaer, 1989; Reichard & Schröter, 2021: 216–217).

In Germany, a common standard was set at the federal, state, and local levels, with the “Employees’ Framework Act,” the “Federal Salary Act,” and the “Retirement Act.” Nonetheless, there are differences in recruitment and promotion and this positively influences the system’s flexibility. Likewise, other mechanisms, such as salaries, performance-related pay, job design, and organizational groups influence public officials’ performance. Nevertheless, Germany has the lowest level of payments based on performance compared to other European countries. This type of payment is mostly paid to experts and managers. Within the scope of the Civil Service Reform Law some public institutions provide financial incentives for officials with high performance, premium, holidays, and public housing (Derlien, 2003; Federal Ministry of Interior, 2014: 56–59; Kuhlmann & Röber, 2006: 104–105).

9 CSOs/CIVIL SOCIETY

Civil society in Germany is strong and influential, and freedom of association is guaranteed under the Basic Law (Federal Foreign Office, 2020).⁵ This development was achievable with the neo-corporatism practice by which there exists a close cooperation between the government and civil society in policy formulation and implementation (Archambault et al., 2014: 4–5). For instance, the Alliance for Work was established in 1998 to propose policy solutions to unemployment (Anheier & Seibel, 2001: 2). On the other hand, the most important way for civil society to oversee the public administration is to apply to the judiciary all over the world. This is frequently used in Germany. The civil society has the chance to qualify as the highest judicial authority in the Federal German Court. Accordingly, the individual has the right to appeal to the Federal German Court if fundamental rights are violated.

There exists a correlation between the development and influence of CSOs depending on state funding (Engel, 2017: 43). In 2009, the share of bilateral support to or through CSOs accounted for 12% of aid in Germany (OECD, 2011: 21), and the amount of the Official Development Assistance (ODA) channeled to CSOs between the years 2010 and 2017 increased to 1,437 USD million (OECD, 2019: 2–3). This can be explained by a number of factors such as the legal and operating frameworks of CSOs in Germany, their role in shaping development policy, democratic culture and grassroots politics, partnership with non-state actors (SDG17), harmonization agenda, as well as technological progress. In 2012, Engagement Global—a state-owned company—was set to partner with CSOs, and promote the education sector in Germany (Engel, 2017: 52). Likewise, the government introduced

⁵ Other laws include the German Federal Civil Code (BGB), Law on Associations of 1964, and Laws on Foundations of the 16 German States. More details are available at: <https://www.cof.org/country-notes/nonprofit-law-germany> [09.01.2021].

the “Strategy on Government-Civil Society Cooperation in the post-2015 Development Policy” in 2014. This strategy is based on three main objectives: (a) enhancing understanding of development issues and mobilizing civic engagement, (b) strengthening civil society forces in developing countries through mechanisms of cooperation with German civil society actors and networks, and (c) extending partnerships on global issues (Federal Ministry for Economic Cooperation and Development, 2015: 8–10). Furthermore, the “Civic Engagement Strategy” was adopted by the Ministry of Family Affairs, Senior Citizens, Women and Youth (2020) since 2016. Platforms such as the Federal Network for Civic Engagement (BBE), founded in 2002, aim to connect the state, private, and third sector.⁶

The union-party link has a strong basis in German history. There are close relations between the various political parties and unions (Dribbusch & Birke, 2012: 3). In many cases, trade union leaders are often candidates for party lists in the elections. The Basic Law forbids a formal union-party tie, but arguably the SPD was formed by General German Worker’s Association in 1875 (Roskin, 2013: 130 and 160). Article 9 of the Basic Law guarantees that all German citizens have rights of association and unionization (Dribbusch & Birke, 2012: 2), and the right to strike has been conditionally accepted by the Federal Court of Labor (Warneck, 2007: 32–33). Interestingly, the State of Emergency Law of 1968 states that unionization, strike, and collective bargaining rights, cannot be limited even in state of emergency cases, such as civil unrest, natural disasters, and war (Karatepe et al., 2014: 53). Besides trade unions, foundations are also influential in social life (Anheier & Seibel, 2001: 15–16; Engel, 2017: 44). Likewise, political parties are cooperating with various foundations with organic ties with themselves.

In Germany, there is no legal restriction on union membership for public officials and there is job security for these officials guaranteed by law. The unionization rate among the workers in Germany was 18.1% and the number of unionized workers was 7.120 million in 2012 (Federal Ministry of the Interior, 2012). However, statistics on the percentage of members of a trade union in Germany decreased from 24.57 to 18.13% between 2000 and 2013.⁷ Furthermore, trade union membership is voluntary, meaning that no worker can be forced to join a trade union. Membership is strong among manual workers in manufacturing and public services, and weaker among private sector workers. In Germany, the trade union density was 19.3% in 2017 (Worker-participation, 2020). The German Confederation of Trade Unions (DGB), which was founded in 1949, is the largest trade union confederation with 5,974,950 million members (2018) and includes many unions from metalworkers, police force, mining, chemistry, science, and education to

⁶ Details are available at: <https://www.b-b-e.de/>

⁷ The Trade union density and percentage of employees members of a trade union in Germany from 2000 to 2013 are available at: <https://www.statista.com/statistics/416156/trade-union-density-germany-y-on-y/> [11.01.2021].

Table 4 Main characteristics of the administrative reforms and modernization in Germany

<i>Characteristic</i>	<i>Definition</i>
Incremental change	Project implementation is based on pilot approach with extensive consultation from concerned policy actors
The New Steering Model “NSM”	An emphasis on politics-administration dichotomy, market-based, contract management, output control, structures integration
Bottom-up approach	Policy implementation and administrative infrastructure are the constitutional responsibility of the regional and local governments

Source (Pollitt & Bouckaert, 2011: 280–282; Wollmann, 2014)

leather workers, as shown in Table 4 (Dribbusch & Birke, 2012: 2; Worker-participation, 2020). The IG Metall is the largest trade union with 2,270,595 members (as for 2018) (Worker-participation, 2020). The DGB is the representative of its individual trade unions at federal and local levels, but its relations with these unions is not very strong. Therefore, individual trade unions are the main factors influencing decision-making processes.

10 REFORMS IN PUBLIC ADMINISTRATION

The German approach to administrative reforms is predominantly based on Weberian bureaucracy⁸ and intergovernmental coordination (Auel, 2014: 426–430; Behnke & Kropp, 2021: 42–46; Derlien, 2003: 97–100; Knill, 1999: 10; Mathys & Schnabel, 2017: 4–6; Önder & Nyadera, 2020). Likewise, the administrative structure was influenced by historical development (Uzun, 2003: 651). Table 4 summarizes the main characteristics of administrative reforms and modernization in Germany.

Germany’s administrative reforms can be summarized with respect to four reform waves. The first wave (1950s and 1960s) focused on resolving the post-war financial burden and reconstructing public services through a federal system. The second wave (1960s and 1970s) focused on founding traditional state functions, such as public finance and public services reforms, reorganization of ministries, and adoption of the Plan Program Budgeting System (PPBS). In 1969, Chancellor Willy Brand pursued a “policy of domestic reforms” in line with the welfare-state project (Wollmann, 2014: 73). Additionally, reforms on the traditional public personnel system in 1970 resulted in the establishment of a commission which detected the problems in the system:

⁸ The administrative federalism in Germany is based on cooperation, functional division of powers, and responsibilities among intergovernmental players (Mathys & Schnabel, 2017: 4).

lack of motivation, and weak performance (Kuhlmann & Röber, 2004: 17–18). Moreover, in the 1970s, Citizen Initiatives emerged due to pressures from the citizens, for more accountable institutions (Pollitt & Bouckaert, 2011: 280; Wollmann, 2000: 920). The third wave of reforms in the 1980s focused on reducing bureaucratic burden and simplifying administrative procedures (Knill, 1999: 13–14). Furthermore, citizen centers were set up in line with the citizen-orientation of local administration and participatory democracy (Wollmann, 2002). The fourth wave in 1990 aimed to reduce the state's administrative apparatuses and focused on policy performance between East and West Germany, particularly the comprehensive reconstruction and transfer of West German administrative paradigms to the East (Temizel, 2011) under the “West–East partnership agreements” (European Commission, 2005; Knill, 1999: 14; Pollitt & Bouckaert, 2011: 281–283). During the 1990s, Germany pursued saving policy, reducing the personnel salaries, downsizing, and flexibility. In 1995, Lean State Advisory Council was created to slim-down the administrative apparatus (Franzke, 2008: 83; Hammerschmid & Oprisor, 2016: 65; OECD, 2004: 39–41; Reichard, 2003: 347). The Enabling State was put into practice with Modern State: Modern Administration Program (1999)⁹ followed by Innovative Administrative Program.¹⁰

Digitalization remains another aspect of administrative reforms in Germany. Since 2000, administrative reforms targeted service delivery and citizens integration, shared service centers were launched in 2005 (Hammerschmid & Oprisor, 2016: 65; OECD, 2004: 40; Pollitt & Bouckaert, 2011: 282–283). eGovernment Act (2013) and Online Access Act (2017) were adopted (Schrapper, 2021: 119). Intranet (2000), eGovernment 2.0 (2006), Networked and Transparent Administration Program (2010–2013), Digital Administration 2020 (2013),¹¹ and Bureaucracy Reduction and Better Regulation (2014) were launched to reduce administrative burdens (Federal Ministry of Interior, 2014: 28–29; Pollitt & Bouckaert, 2011: 284).

In line with its Artificial Intelligence strategy, Germany allocated €500 million from its 2019 federal budget and is expected to provide €3 billion by 2025 to build AI hubs and meet global competition (Federal Government, 2018: 12). The current AI research focuses on machine learning and Artificial Neural Networks (ANNs). The German Research Center for Artificial Intelligence (DFKI) contributed to creating 80 spin-off companies and patents in various AI fields (Federal Government, 2018: 13; Groth & Straube, 2019:

⁹ It is based on principles of re-distribution of responsibility, responsive public services, diversity of public bodies, and efficient and effective administration (OECD, 2004: 40).

¹⁰ The aim was downsizing, implement modern management principles, improve intergovernmental cooperation, professionalize human resource management, and e-government practices.

¹¹ This program is enabling citizens to access administrative services anywhere and anytime without visiting public institutions in person (Federal Ministry of Interior, 2014: 28).

16).¹² In 2017, the Platform for AI brought representatives from academia, private sector and civil society, to exchange and cooperate in Research and Development (R&D).¹³ Likewise, the government aims to set up regional Centers of Excellence for Labor Research to develop innovative strategies and concepts on using AI in the work place, the management skills of the workforce, and knowledge transfer to small and medium-sized companies (SMEs). Nevertheless, the development of AI does not only depend on technical and financial spending, digital infrastructure, and partnerships, but also on individuals' right to relinquish control of their personal data for the benefit of larger society.¹⁴

11 CONCLUSION

This chapter explored continuities, changes, and developments in German public administration from a historical and developmental perspective. Table 5 presents Germany's public administration attributes.

Historically, changes from the 1st Reich under Charlemagne until the unification process of East and West Germany have shaped the country's administrative identity and system. Generally, the administrative system and culture at the federal and state levels are based on the Weberian-hierarchical model. In the wake of the NPM reforms of the 1990s, effectiveness, productivity, consumer-orientation, performance management, governance, decentralization, and privatization became very essential in all levels of German public administration. The quest for reforms and modernization came in line with Network Governance by which public sector, private sector and third sector collaborate to deliver goods and services to citizens. The New Public Administration Approach after 2000 influenced German public administration to establish reforms through bottom to up processes. Therefore, a shift from a strict Weberian bureaucratic model to a more flexible, entrepreneur, decentralized, and result-oriented public administration took effect (Nyadera & Islam, 2020). Nevertheless, Germany was "very selective" in implementing neo-liberal reforms in its public administration, given the intrinsic influence of the Weberian bureaucratic model and *Rechtsstaat* culture in the German public administration. It is argued that one issue for discussion in the German public

¹² According to Konrad-Adenauer-Stiftung (2019), the promotion of machine learning amounted to €77 million from 2017 to 2021, and €30 million for the institutional promotion of the DFKI from 2018 to 2022.

¹³ Further information on the Platform can be found at: <https://www.plattform-ler-nende-systeme.de/about-the-platform.html>.

¹⁴ Joana Cotar from AfD party argued that Germany's General Data Protection Regulation can be amended and that Germans should no longer worry about sharing their data, if AI benefits them, helps reducing mortality rate or proposing new treatments to save lives. Retrieved from Kinkartz, S. (2019). Skeptical Germany lags behind on artificial intelligence. DW, December 29, 2019. Available at <https://www.dw.com/en/skeptical-germany-lags-behind-on-artificial-intelligence/a-51828604> [17.01.2021].

Table 5 Public administration system in Germany

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>	
Administrative History	Geopolitical situation	Strategic, but lack of natural borders	
	Colonial history	A colonial power during nineteenth century	
	Legacy of bureaucracy	Advanced and strong bureaucracy	
	Centralized bureaucracy	Moderate due to federal structure	
	Role of military	Strong in the past, but weak recently	
	Political culture	Disciplined, liberal, and participative	
	Administrative culture	High	
	Professionalism	High	
	Politicization of bureaucracy	Moderate	
	Dominant state ideology	Secularism, welfare-state	
Legal Structure	Nature of constitution	Written	
	Origin of constitution	1949, enforced by winners of WWII	
	Strong constitution	Yes	
	Constitutional rigidity	Flexible yet stable constitution	
	Created by	A committee of experts & civil servants	
	Revised by bureaucracy	Civil initiatives	
	Administrative judiciary system	Moderate	
	Central Government	State structure	Federal
		Government structure	Parliamentary
		Hierarchical structure	Moderate
Local extension agencies		Limited to main areas	
Central government		Moderate	
Coordinating mechanisms		Vertical/horizontal & formal/informal	
Transparent financing system		Strong	
Monitoring		Strong	
Independent regulatory agencies		Exist	
Local Governments		Financial autonomy	Strong
	Political autonomy	Strong	
	Council types	Council Mayor	

(continued)

Table 5 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Central-Local Government Relations	Mayors	Elected
	Decision-making bodies	Local council (representative assembly) and local administration (The Mayor)
	Central tutelage/monitoring	Exist, moderate
	Subsidiarity principle	Decentralization
	Logic for division of tasks	Fair and rational
Public Personnel System	Tutelage/monitoring	Moderate
	Communication	Formal
	Civil services	Career-based, meritocracy
	Scope of civil services	Competitive
CSOs & Civil Society	Recruitment & promotion	Fair and non-political
	Nationwide exam	Examination by local governments
	Civil services	Strong
	Politicization in general	Weak
	Unionization	Strong
	Size of Civil Society	High
	Institutionalization	Strong
	Partnership with state	Moderate
Reform Philosophy	Political pressure/domination	Weak
	Major financial revenues	Government support, donations, fundraisings
	Supportive national culture	Strong
	Dominant elements/characteristics	Decentralization, cooperative federalism, governance
	E-government reforms	Exist
	Artificial intelligence (AI) reforms	Exist
	Influence of international actors	EU, NATO, OECD, G7, WTO
New reforms	New Steering Model, Lean State, performance management	

Source Adapted and developed from Önder, M. & Zengin Ü. N. (2022). A framework for comparative analysis: Public administration across the globe. In M. Onder, I. N. Nyadera & M. N. Islam (Eds.), *The Palgrave Handbook of Comparative Public Administration: Concepts and Cases*. Springer Nature Palgrave Macmillan

sector is the downsizing approach pursued in the aftermath of the unification process and its implications on the quality of services delivered.

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Federative Republic of Brazil

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I INTRODUCTION

Brazilian public administration has unique features in many respects beyond the beauty of the unique Amazon rain forests, festivals, and football. When Brazil is examined in terms of administrative history, the country has had many administrative experiences from the colonial regime to authoritarian military governments. These various experiences have affected many dimensions of public administration, from bureaucracy to the structure of local governments and even to civil society. Indeed, the 1988 Constitution was a major turning point for the Brazilian administration. Brazil's public administration has experienced reform, renewal, and restructuring of their democratic, financial, and intergovernmental relationships throughout the last thirty years. Since the democratization reforms and promulgation of the 1988 Constitution, Brazil became one of the most decentralized countries in the world in terms of the redistribution of financial resources and political power. After two decades of military rule, the new process of democratization and liberalization brought some questions about democratic principles including those on political, financial, and administrative decentralization (Souza, 1997).

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The civil transformation in Brazil in the 1980s brought a new model with the reform movements in the NPM (marketization, privatization, performance management, civil service, etc.) and changes in the government system. This chapter evaluates how Brazil went through the process of democratization in its administrative history, especially post 1980s, in terms of the axis of NPM/governance reform movements and decentralization of fiscal and political autonomy. The main features of Brazil's administrative structure can be listed under four headings which makes Brazil worthy and interesting to study:

1. Brazil has a hyper presidential system where both legislative and executive power is mostly in the hands of the President,
2. In the administrative structure, which adopts the separation of powers principle, there is a "check-balance" system to control the distribution of power among the legislative, executive, and judiciary branches,
3. There is a strong federation in which administrative power is distributed among federative unit,
4. Especially recently, there are various reform initiatives under the light of NPM reforms to solve problems arising from the administrative system.

2 ADMINISTRATIVE HISTORY

Brazil, like many Latin American countries, has always had a turbulent political life throughout its history. Since its independence from Portugal, the country has transitioned between weak democratic regimes dominated by economic elites and authoritarian regimes ruled by the military. Brazilian public administration has undergone three major turning points in the transition from monarchy to democracy since the colonization era until the present: patrimonialism, bureaucratic, and managerialism (Puppim de Oliveira, 2017: 11). Brazilian administrative evolution goes from the patrimonial system, in which personal interests were confused with public interests to a time of bureaucratization, which sought to give greater impersonality, hierarchy and clearer rules to state activity; and culminates in a third moment, in which private managerial practices are introduced in public administration, guaranteeing greater agility and direct results (Netto, 2016).

Patrimonialism, the first major turning point, begins with the colonies and extends from the Empire to the Old Republic (1889–1930). Brazil was the only Latin American country colonized by the Portuguese Kingdom in 1500. In 1530, a group of explorers led by Martin Alfonso de Sousa established the first colonies in the regions of Rio de Janeiro and Santos (Salvador). From the sixteenth century, the country received immigration not only from Africa but also from Asia and Europe since sugar cane production was initiated, and there was a big labor shortage. This situation formed the basis of Brazil's ethnic diversity and took place with the synthesis of indigenous, Portuguese, and African cultures. The church, which combines this heterogeneity, was in

a strong position until the mid-twentieth century. The “cultural plurality” has constituted a unique administrative tradition and mechanisms.

The discovery of gold and diamonds in the seventeenth and eighteenth century literally altered Brazil’s destiny. Brazil became very important for the Kingdom of Portugal after the discovery and a revolution attempt took place in the city of Vila Rica in response to the increase of tax prices in 1789. Although Brazilian colonial elites did not support the independence, the demands for increased autonomy were generated by economic growth fueled by mineral resources and helped to construct a distinct Brazilian identity. The Portuguese royal family and some dignitaries of the state fled to Brazil in 1807. And the following year, they established their headquarters in Rio de Janeiro. In this way, the Portuguese Royal bureaucracy moved to Brazil and the foundations of a modern and rational bureaucracy were laid in the country. At the time, Brazil was being recognized as a Kingdom with equal status as Portugal.

In the nineteenth century, when the Portuguese Parliament wanted to return the country to its first colonial status, the Brazilians started an independence movement under the leadership of Pedro I and declared their independence in 1822. At the same time, the Kingdom of Brazil created the first constitution in 1824 with Britain’s support. After the irregular wars, the Portuguese were finally forced to accept the independence of Brazil. With the military coup in 1889, Emperor Pedro II was ousted from power, and the Federative Republic of Brazil (*República Federativa do Brasil*) was established in a country that was ruled by a monarchy since 1822. In 1891, a new constitution was drafted and an administrative system based on federalism was built. Brazil’s first constitution was drawn up along lines similar to that of the USA (Wylér, 1949: 53). Between 1889 and 1930, Brazil became a republic in the period known as the “First (Old) Republic.” Patrimonialism as mode of public administration continued from the monarchy, now controlled by a political elite (Puppim de Oliveira, 2017: 10).

After the First World War, Brazil quickly began to industrialize and urbanize but its political structure was inadequate to meet the urban middle and working classes’ demands. The 1929 economic crisis accelerated the process of change and the elites of the Rio Grande do Sul and Minas Gerais provinces overthrew the old regime by organizing a revolution. In the 1930s, members of the right and left ideologies in Brazil’s major cities entered violent conflicts. In October 1930, intending to end the First Republic, the military intervened in politics and Getúlio Vargas took control of Brazil. With the 1930 Revolution, the second major turning point marked by the Bureaucratic Reform began. The Bureaucratic Reform period continued until the 1990s, when the Managerial Reforms were implemented in 1995 (Lescura et al., 2012). Vargas centralized and modernized the state by bringing many principles of the Weberian administration and constituting the Department of Administration of the Public Service (DASP). However, patrimonialism continued in many ways (Farah, 2011, 2016). With the establishment of national public companies such as the National Steel Company (*Companhia Siderúrgica Nacional*)

in 1941, the national development model began to be adopted and continued after the Vargas' New State Era was over.

Dictatorships fell out of fashion soon after World War II. In 1945, Vargas was forced to resign and after this, a new constitution was written. A more balanced and liberal constitution was drafted by a constituent assembly that re-established fundamental human rights and separation of powers. Representative democracy was established; Brazilians got their first true taste of democracy and there was real rivalry for control of the state for the first time (O'Neil et al., 2009: 459). In 1964, President João Goulart's imprudent effort to establish an opening to the left led to his military overthrow, putting an end to the first experiment with democracy in Brazil's history (Bethell, 2018: 158). A new dictatorship was established and the modernization process in public administration continued under the new dictatorship. Brazilians lived under authoritarian military rule for twenty-one years until 1985.

The transition from authoritarian rule to democracy began in 1974 when President Ernesto Geisel began to carry out a gradual political opening process marked by small advances that restricted the development of complete democracy. The organization of free congressional elections was the first meaningful measure for democracy. The economic stagnation and high inflation experienced between 1985 and 1992 led to the realization of neo-liberal reforms in public administration. The National Treasury of Brazil, which is now the authority of Brazil's financial management, was established in 1986. It is responsible for maintaining the balance of public accounts, fiscal policy, public debt management, and controlling tax collection and public spending. The National Treasury is responsible for maintaining the balance of public accounts by controlling tax collection and public spending, controlling credit operations in states and municipalities, monitoring public projects, and performing several other functions to support the control of public finances (Alves, 2015). The Collor de Mello government wanted to implement New Public Management (NPM) reforms alongside marketization reforms. With the establishment of the contemporary Brazilian constitution in 1988, more responsibilities have been given to states and municipalities, and this situation has paved the way for decentralization. NGOs have also started to be more active in public administration.

Between 1992 and 2002, there was a significant opening of the economy and de-bureaucratization efforts increased. As a reflection of this situation, there has been a gradual decrease in the number of federal public employees (Nunberg & Pacheco, 2016). Several managerial reforms were introduced in the federal government, as well as some states and municipalities.

Brazil, especially after becoming a BRICS member, is constantly pushing for reforms in order to improve performance, transparency, and accountability of public administration since the BRICS success depends on how much the governments of its members and public administrations are trusted at home (Islam, 2018, 2019). But some serious questions remain about the long-term

Table 1 Administrative history of Brazil

<i>Time period</i>	<i>Administrative tradition</i>
1500–1822	Colonial Period
1822	Independence from Portugal and Monarchy Period
1822–1891	Building the national State and patrimonialism (The public administration used to serve political elite)
1891–1930	Federal presidential republic established with “separation of power” and “check and balances” principle
1930–1945	Centralized bureaucratic public administration and Weberian administration
1945–1964	National Developmentalism (industrialization, urbanization, and state-ownership)
1964–1985	Authoritarian military regime with high degree of centralization
1985–1992	Democratization and neo-liberal reforms (NPM Trend)
1992–2002	Managerialism, professionalism and de-bureaucratism
2002–2011	Administrative modernization (e-government reform and open data initiatives) and human resource management reform
2015–2020	Social security and fiscal reform

Source Adapted and developed from Puppim de Oliveira (2017)

viability of democracy due to the situation it is in. Historically, patrimonialism and nepotism have become a part of Brazilian governance culture despite dozens of reforms. Motta and Alcadipani (1999: 6) mentioned that the Brazilian “jeitinho” is the typical process for someone to reach something desired despite contrary determinations (laws, orders, rules etc.). Along with jeitinho, issues such as the extraordinarily high level of economic inequality, rising crime rates and the wave of lawlessness, corruption, and political stalemate legacy are believed to erode confidence in democracy and the rule of law (Table 1).

3 CONSTITUTIONAL FRAMEWORK

After the monarchy and military dictatorship periods, Brazil experienced a peaceful transition to civilian rule in 1985. The existing constitution at the time was the one adopted in 1967, which had been greatly altered by many “institutional acts” implemented during the military regime. A new legal structure was needed as part of the re-democratization process to legitimize and control the exercise of political power in compliance with democratic principles. The new Brazilian constitution was promulgated on October 5, 1988, after a two-year period of deliberation, with 245 articles and 70 transitory provisions intended to regulate the transitional process toward the new legal order (Lirio do Valle, 2020: 427). The 1988 Constitution was the result of the struggle of pro-democratic social movements and the articulation of a political elite wanting to replace military rule with a new constitutional contract

(Alvarado, 2018: 138). It was also a breakthrough in political and democratic agreements, as well as a pioneering document for economic, social, and human rights in Latin America. The Brazilian constitution, which has been in effect for 33 years, has outlasted the average 17-year lifespan of such legal documents (Ginsburg et al., 2007). The 1988 Constitution still remains standing despite 105 constitutional amendments. As Fontaine put it, *“it bends but does not break.”*

The Brazilian legal structure takes its main normative source from the Federal Constitution of 1988, which determines the fundamental foundations and objectives of the republic. The 1988 Constitution represents the supreme law of the country. It is also casuistic and extraordinarily long, with 250 articles in the main text and an additional 75 provisional articles. It reflects several principles such as “transparency,” “participation,” “social control,” and “redistribution” (Alston et al., 2006: 12).

Brazil is a federated presidential republic comprising of the Union, the states, the federal district, and the municipalities, where the exercise of power is attributed to separate and autonomous entities. Today, Brazil has 26 states and 5,570 “municípios.” All of them have their own legislative, executive, and judicial institutions. Actually, the main purpose for carving out the 1988 Constitution was to grant state and municipal governments administrative autonomy and responsibility for policy implementation, decentralizing the federal power. Under Sarney’s administration (1985–1989), the first civilian federal administration, the initial steps were taken to decentralize and redefine federal, state, and local government responsibilities. Unlike in Canada and the United States, where federalism was a technique for uniting states and provinces that had once been autonomous political entities, in Brazil federalism was a technique for dividing what had always been a unitary government system (Rosenn, 2005: 577). The country embraced federalism as a response to the oppressive, highly centralized rule of the Empire in a nation of immense size and separate regions with very different customs. Federalism has helped Brazil to preserve national unity by creating a significant local autonomy measure to accommodate culturally diverse regions. Despite the fact that each unit has formal political autonomy, the central government holds a high proportion of legislative power. Although constitutional provisions are regulating mandatory income transfers to states and municipalities, the central government receives the majority of the revenue. Therefore, there are practical constraints on the political autonomy of subnational federative entities. (Lirio do Valle, 2020: 428).

Brazil is a republic and ruled by the presidential system since the people elect the President of the Republic. The President is both the head of State and government. The presidential system established during the 1988 Constitution period and is also known as “coalitional presidential.” Brazil has a multi-party system; therefore, it allows the formation of various political parties. Due to the current electoral system, the number of parties entering the parliament is quite high. While forming his/her government, the President has to provide

a certain amount of support from other parties. It is almost a certainty that no party, including the party of the Brazilian President, will ever control a majority of the seats in Congress (Power, 2010: 19). This situation is criticized for causing various difficulties. This is because in times of crisis even the support of the President from his own party decreases. In the past, presidents have resorted to establishing a majority through patronage relations, thus bypassing the political parties and Congress. (Maxwell & Mainwaring, 1999). Despite the presence of a decentralized electoral system and a fragmented party system, the optimal electoral strategy in the Brazilian legislature has not been concentrated in personal votes, but rather, the party vote in Congress (Figueiredo & Limongi, 1999; Pereira, 2000). As in other countries governed by the presidential system, the Brazilian administrative system has units and institutions under the presidency (secretariats) that assist the President in public policy making and the decision-making process.

The federal government's functions are split horizontally into three branches of power: the executive, legislative, and judicial. It is clear that the Brazilian Constitution has been influenced by the United States regarding the point of separation of powers. However, Brazil has integrated the United States system differently. Brazil has a check and balance system, which causes a range of overlaps between the three branches. Thanks to the system, the legislative and executive cannot dissolve each other. For example, laws approved by Congress are subject to the President's sanction and the President has the power to veto legal provisions and nominate Supreme Court judges. Also, Congress is able to charge the President.

In Brazil, the executive has broad powers in the fields of economic and foreign policy, finance, and internal security. The executive branch is divided into three levels: federal, state, and municipal and is headed by the President, who is directly elected for a four-year term by a majority of the citizens at the federal level, governors at the state level, and mayors at the municipal level. The national legislative authority is bicameral and the state legislatures have a single chamber (Mainwaring, 1991: 22). Congress is divided into the Senate and the House of Representatives. While the former is composed of 81 senators, the latter is composed of 513 deputies. The judicial branch is split into lower courts, appeals courts, and supreme courts. The Supreme Court is the highest court that only reviews constitutional matters. Eleven judges are nominated by the President and confirmed by the Senate to become members of the Supreme Federal Court. The Court can declare federal, state, and municipal laws unconstitutional and invalid.

As a result, while such features, such as electoral laws, a multi-party structure and federalism, serve to decentralize the democratic system, other features, such as the internal rules of the Congressional decision-making process, the President's constitutional powers and his right to distribute selectively political and financial resources, act to centralize it.

4 CENTRAL GOVERNMENT IN BRAZIL

Brazil’s administrative structure takes place in a framework of a presidential representative democratic republic with considerable decentralized federalism. All constitutions in Brazilian administrative history have adopted the principle of “separation of powers.” Brazilian administrative structure is also designed on the basis of “check and balances” system and the “rule of law” principle. The Brazilian federal government organization is divided into three branches and is shown in the Table 2 with its bodies.

4.1 *The Federal Executive Branch*

4.1.1 *Head of State*

The Brazilian constitution chose the direction of “hyper-presidentialism” in creating the executive branch, not only enhancing the executive powers related to unusual circumstances, but also granting the branch with semi-legislative powers and strong control over administrative units (Lirio do Valle, 2020: 429–430). The President of the Republic exercises the Brazilian executive authority, assisted by the ministers of state. An absolute majority directly elects the President for a four-year term. As is the custom in Latin America, the President is both the head of government and the head of state. Constrained by the separation of powers, Brazilian Presidents must obtain political support in

Table 2 Federal government in Brazil

<i>Organizational structure of of Federal Brazil</i>	<i>Organs</i>
Executive	Presidency of Republic <ul style="list-style-type: none"> • President of Republic • Vice-President of Republic • Secretariats Ministries Council
Legislative	Federal Senate Chamber of Deputies
Judicial	Federal Supreme Court Superior Court of Justice Federal Courts Labor Courts Electoral Courts Military Courts State Courts

Source Adapted and developed from Government of Brazil (2022)

a congress where party fragmentation has reached one of the highest levels ever found in the world (Figueiredo & Limongi, 2000: 151).

The election of the President and Vice-President takes place simultaneously. They are allowed to serve a second term, but the President has to break for a term before running for the presidency again. The Brazilian President can appoint members of the cabinet and the top levels of Brazil's large bureaucracy. After approval by the Federal State, the President also has the power to appoint the Justices of the Federal Supreme Court and the Superior Courts, the Governors of the Territories, the Attorney General of the Republic, the President and directors of the Central Bank, and other civil servants.

In Brazil, the President controls much of the agenda-setting power in executive-legislative interactions. More than 85% of all legislation adopted since 1985 has originated in the executive branch, often via "presidential decrees" (Limongi & Figueiredo 2007). The power to issue a decree gives the President the power to legislate since it comes into force immediately. In addition, the President also dominates the agenda of Congress with this authority. Until the 2001 amendment, decrees could be reissued many times without a Congressional vote. In 2001, Congress made a constitutional amendment limiting this authority and introducing a rule that the expired decree can only be renewed once (Negretto, 2004).

Another important constructive power of the President that increases their control and influence over the legislature and enables them to oversee the legislative agenda is the authority to legislate through "provisional measures (medidas provisórias)" (Reich, 2002). This institutional device enables the President to promptly and without legislative consent implement new legislation (Alston et al., 2006: 18). The only constitutional requirement regarding provisional measures is that they should only be implemented in exceptional situations of relevance and urgency. If this type of situation occurs, the President issues a decree having the force of law and immediately presents it to Congress, and if not converted into law within 30 days, it loses its effectiveness (Neto, 2002: 58).

The veto power is the most famous in terms of reactive authority, in the sense that it enables the President to protect the status quo by responding to the attempt of the legislature to alter it. The most popular is the veto kit in which the President may dismiss the entire law sent by Congress. The Constitution allows partial vetoes in addition to authorizing the President to veto entire bills (Negretto, 2004).

As of the latest reforms in Brazil, in 2015, the President's prerogative over public funds was extended by Constitutional Amendment 85/15, which authorized the executive branch to readdress, reallocate, or move funds within science, technology, and innovation programs without prior legislative authorization. At the end of 2019, the Congress passed the Constitutional Amendment 105/19, granting congressional representatives the authority to assign funds to subnational entities.

4.1.2 *Cabinet, Ministries, Secretaries, and Council*

The Cabinet of Brazil (Gabinete Ministerial do Brasil) is made up of ministers of state and senior advisers of Brazil's executive branch. In Brazil, ministries are a part of the highest level of government. They reply directly to the President in order to facilitate the exercise of executive power. Cabinet officers are appointed and dismissed by the President. Ministries and other public institutions and organizations are established and abolished by law. There are currently 22 cabinet members in Brazil.¹

The Minister of the State exercises guidance, coordination, and supervision of the agencies and entities of the federal administration in the area of his authority and countersigns acts and decrees signed by the President; issues instructions for the enforcement of laws, decrees and regulations; submits to the President an annual report on his administration of the Ministry; performs the acts pertinent to the duties assigned or delegated to him by the President (Figueiredo & Limongi, 2016; Tripodi & Sousa, 2018).

However, the Brazilian Government also has special secretariats that are directly responsible to the presidency and have "ministerial status" due to their strategic functions. For example, the Government Secretariat assists the President in political and social coordination, specifically in dialogue with the National Congress, political parties and states, and federal regions and municipalities. The Secretariat is also responsible for preventing and managing corporate crises and formulating policies. On the other hand, the "councils" are the effective body of the Brazilian executive in public policy making. In particular, councils consist of representatives of local governments, civil society, academia, and even professional organizations, depending on their purpose (security, energy, sports etc.). There are currently over 20 councils in the Brazilian executive body.²

4.2 *The Federal Legislative Branch*

The bicameral National Congress of Brazil (Congresso Nacional do Brasil), comprising the Chamber of Deputies (Câmara dos Deputados) and the Federal Senate (Senado Federal), exercises Brazil's legislative power. The 513-member Chamber of Deputies is the lower house and the 81-member Federal Senate is the upper house (O'Neill et al., 2009: 464). The Federal Senate is re-elected every four years, as is the Chamber of Deputies one-third of the seats in one election and two-thirds in the next.

The Chamber of Deputies is composed of representatives of the people elected, by the proportional system in each state, territory, and in the federal district. The number of members of the Chamber of Deputies is regulated by the "supplementary law," which results in the states and federal republics.

¹ <http://www.brazil.gov.br/presidency/ministers>.

² <http://www.brazil.gov.br/government/how-the-government-works/federal-executive-branch>.

This formula results in unequal political representation in the Chamber of Deputies, with densely populated states like São Paulo underrepresented and sparsely populated states benefiting from overrepresentation (Lirio do Valle, 2020: 429). In accordance with the Constitutional provision, the number of representatives of a state may vary between 8 and 70. The Federal Senate is composed of representatives of the states and the federal district, elected by a majority vote. Each state and the federal district elect three Senators for an eight-year term.

The 1988 Constitution gives power to the National Congress to rule on issues related to the federal government, particularly those related to fiscal policies and administration of the union. Before it is sent to the President, all houses must approve all legislation; if the houses disagree with legislation, they convene common committees to sort out differences.

4.3 *The Federal Judicial Branch*

Brazilian judicial review combines the decentralized, incidental form of judicial review of a common law country, like the United States, with the centralized, abstract form of judicial review of civil law countries, such as Germany and Italy (Cappelletti, 1971: 85–86). The 1988 Constitution augments judicial independence and makes the judiciary the primary guardian of constitutional rights.

There are two branches of the Brazilian judicial system: the ordinary courts, (*Justiça Comum*) composed of state and federal courts, and the specialized courts, (*Justiça Especializada*) composed of labor, electoral, and military courts. The Federal Supreme Court (*Supremo Tribunal Federal*), whose eleven magistrates are named by the President and authorized for a term not exceeding thirty years by a majority vote in the Senate, is at the highest Brazilian judicial formation level. Under Article 102, the Constitution grants the Federal Supreme Court the right to hear by exceptional appeal any decision that is contrary to a Constitutional provision in sole or final instance; declares unconstitutional a treaty or federal law, or upholds a law or allowing government act challenged as violating the Constitution. Although the Constitution states that tribunals may declare laws unconstitutional only by an absolute majority vote, the Federal Supreme Court has held that a judge who sits alone has the power to declare a law or act unconstitutional (Rosenn, 2009).

As is the standard in Latin America, Brazil uses code law a rigid structure in which judges enforce the penal code rather than interpret laws based on historical precedent in a broad manner. As a result, the Brazilian judiciary has less power than its US counterpart, and the Federal Supreme Court has been hesitant to challenge the ongoing use of presidential emergency decrees (O'Neill et al., 2009: 466).

The Supreme Court of Justice (*Superior Tribunal de Justiça*) is composed of 33 judges named by the President with the Senate's approval. It is the highest

court on non-constitutional issues in Brazil and also handles cases concerning states' governors and the federal district.

Prillaman (2000) has observed that the 1988 Constitution was so prescriptive and detailed that it constitutionalized a staggering range of minor issues and flooded the courts, even the Supreme Court, with the most trivial cases. The Brazilian judicial system has long been criticized for inefficiency, but there have been some attempts to reform it, including, most notably, the adoption of Constitutional Amendment in 2004. This amendment was made to establish the principle of *stare decisis*, in which the judgments of the high courts were to be treated as binding precedents, in order to increase the efficiency of the lower courts. The amendment also established an autonomous institution, the National Council of Justice, to monitor compliance with the judiciary rules and to consider complaints against judges.

4.4 *Independent Regulatory Bodies*

In order to regulate the distribution of public services by private organizations, regulatory bodies were established in Brazil. The regulation and monitor bodies differs for each sector. They set down guidelines for the industrial sector, in addition to regulating the level of service delivery. The regulation includes government initiatives. From 1997 to 2000, six regulatory agencies were created, such as telecommunications, electricity, petroleum, health plans, food & drugs, and water (Mueller & Pereira, 2002: 452). Currently, there are ten regulatory bodies in Brazil. In 2001, film, surveillance, waterway and land transportation agencies, and 2005 civil aviation agency were established. The bodies are governed by a board consisting of councilors or directors, each of which are selected as director or president by the President of the Republic. Reform movements in Brazil made it necessary to establish such regulatory and monitory bodies.

5 LOCAL GOVERNMENTS IN BRAZIL

Brazil is the fifth largest country in the world with an area of 8.516.000 km², after Russia, Canada, China, and the United States. In this context, Brazilian local governments have a unique structure with their geographical area, autonomy of local units, and ethnic standpoint (Jha, 2008: 157–158). From a historical perspective, the post-military period in the 1980s, the adoption of a new constitution in 1988, and the constitutional changes made after 1996 are the cornerstones that clarify the basic elements of social services and local government. The long tradition of local autonomy represents the three tiers of cooperative federation inscribed and detailed in the constitution (Afonso & Araujo, 2006: 383). The 1988 Constitution specifies the federal administration, states, and local governments' services separately and in detail. The 1988 Constitution translated Brazilian society's thrust toward

decentralization into a set of rules and also reinforced the process of decentralization of revenue mobilization and expenditure functions, instead of solely deconcentrating them (Afonso & Araujo, 2006: 381).

While the Constitution defines certain service areas only to the federal administration (defense, international trade, banking etc.), there are also areas for which the federal administration, states, and local governments are jointly responsible (welfare policy, tourism, environment and natural resources protection, etc.). For example, local governments have an important role in the provision of health, housing, education, and services. Within the framework of vertical and horizontal relations, there are services in which administrative levels are jointly realized in accordance with the cooperative federalism management and services provided only by local units. For example, preschool school/elementary education and preventive healthcare are basically the duty of local units (Souza, 1997: 44). On the other hand, vertical relations between federal government and states-municipalities, and between state governments and their respective municipalities are characterized by “autonomy” because of the fact that states and municipalities are “autonomous federal entities” (Arretche, 2002: 5) (Table 3).

Municipalities were granted great autonomy by the 1988 Constitution. Jha (2008: 157) mentioned that “In 1988, the new Constitution was enacted making Brazil one of the most decentralized federations in the world.” Similarly, O’Neill et al. (2009: 48) argued that Brazil’s new democracy has strongly re-established the concept of robust federalism and Brazilian federalism transfers more authority to the states than most other federal systems. Currently, there are 5570 municipalities (municípios), 26 state governments (estados), and 1 federal district (distrito federal) in Brazil. Both the number of municipalities in the states and the population of municipalities vary greatly.

Unlike other federative countries, municipalities are not a member or part of the state, the establishment, abolition, and merger of municipalities are

Table 3 Local government in Brazil

<i>Subnational government of Brazil</i>	<i>Number of units</i>
Municipal Level	5570 (Directly elected Mayor and Council)
State Level	27 (26 State Government and 1 Federal District)
Subnational Government	5597
Urban Population	85,4% of national population

Source Adapted and developed from OECD & UCLG. (2016, October)

done by state law. The states and the federal district have their own constitution. Each municipality is authorized to adopt its constitution, known as the “organic law,” after adopting the 1988 Constitution (Afonso & Araujo, 2006: 384). The administrative structure of states is similar to the federal state structure. Each state has a legislative, executive, and judicial branches. However, the legislatures of federated states are unicameral. In the federated states and the federal district, the head of the executive body and government is the “governor,” and the governor appoints government secretaries. The federal district governor in the capital city of Brasília is appointed by the President with Senate approval. The term of governors and deputy governors is four years. Elections of governors and deputy governors are held in October in two stages. Similarly, the municipal government conducts elections of its own. The Mayor (executive) and the municipal council members (legislative) are directly elected for four years by the electorate.

Maria de Souza (2020), argued that the decentralization and municipalization movement in Brazil not only has limited the transition of policy implementation to local councils, but it has also included transfer to local communities of the sharing of decision-making responsibilities. This emphasis on democratic practices and citizen participation in the 1988 Constitution in Brazil appears at the local level as “community council” and implementing “participatory budgeting” (Maria de Souza, 2020; Shah, 2006). Participatory budgeting was realized for the first time in Brazil in 1989 in Porto Alegre. The city gained international recognition as the leading city in terms of local governance. This participatory practice has spread over time to other cities of Brazil, primarily to other Latin American countries such as Argentina, Uruguay, Peru, Chile, and Ecuador, as well as other parts of the world (Fortes, 2013; Wampler & Avritzer, 2016).

Fiscal decentralization is the basis of the sharing of duties, powers, and services with the local units in Brazil. Afonso and Araujo (2006) argued that the 1988 Constitution was essentially a process of “municipalizing the mobilization of revenues” and the “provision of services.” The more comprehensive transfer of incomes from the federal government to subnational governments is a result of the strong connections between state and local authorities’ governments, and federal policymakers (Garman et al., 2001: 228). Brazilian municipality has enjoyed wide autonomy in levying taxes, making investments, and even recruiting public workers, setting their wages, and contracting debts (Afonso & Araujo, 2006: 384). The municipalities also receive transfers from the central government as they perform services, such as public health. Besides, municipalities collect tax on service and property and each municipality determines its own rate.

6 INTERGOVERNMENTAL RELATIONS

In Brazil, there has been an ongoing struggle between central and local governments throughout its history. At the heart of this struggle are

the geographic areas, demographic features, and socio-economic differences between rural and central regions. The relationship between central and local governments began with political decentralization and was nurtured by fiscal decentralization. Local authorities have exercised substantial control for most of Brazil's history, but the pendulum turned decisively against the federal government during the military dictatorship.

In the 1960s, the Brazilian public administration experienced a comprehensive restructuring designed to restore fiscal equilibrium and planning strategy. The plan envisaged a concentration of expenditure and investment decisions in the central government. With the end of the developmental economic model and the military dictatorship period (1964–1985), central and local governments' relationship became more important than ever (Falleti, 2006). The 1988 Constitution expanded the powers of subnational governments and delegated many of the government roles to states and municipalities, particularly in the social sphere. The Constitution also granted subnational governments a higher level of devolution of powers and financial autonomy (Mora & Varsano, 2015). Moreover, the formation of new municipalities has become a right and privilege of the states. Due to the flow of resources to municipalities, many states created new municipalities to receive more federal transfers. The tax powers of states expanded as they were given the ability to tax energy, minerals, transportation, and telecommunications. Fiscal resources were redistributed to the federal government's disadvantages, because of this growth in federal taxes shared with subnational governments. The revenues shifted from states to municipalities have also increased (Jha, 2008; Mora & Varsano, 2015). This situation caused tax war and macroeconomic problems between the states.

In the 1980s and 1990s, the decentralization reform movement spread throughout Latin America. Almost every country enacted initiatives to improve local and regional governments' function. Brazilian federalism has started devolving more authority to states than in most other federal structures (Montero, 2001; O'Neil et al., 2009).

The relationship between federal and states generates power balances between the federative bodies in Brazil that derive from tools that can be clustered into "fiscal, legal and administrative capacities," that combine to make policies feasible at each tier of public administration (Abrucio & Grin, 2015; Falleti, 2006). Similarly, Arretche (2002) handled the intergovernmental relations of Brazil from the perspective of "tax, financial system and social policies." Thus, Brazil's decentralization trend in the 1980s evolved to social policy transfer from central to local governments in the 1990s population. This naturally necessitated the devolution of authority from the center to the local governments. Furthermore, one of the fundamental "willpower" of the relationship between central and local relationship has been to reduce the differences or inequalities between regions.

Regarding service delivery, the federal government regained its capacity to form and implement dynamic social policies in the second half of the

1990s. Once again it has started to play the main role in the formulation, coordination, and financing of services. On the other hand, the federal government delegated or shared civil service administration to the subnational governments. In particular, education, medical and hospital care, and outreach programs were shared with the local level (Afonso, 2004: 152). This “rules-based policy transfer” or “division of tasks/service delivery” has reduced conflict and confusion among federal resources among municipal governments. One of the consequences of this model is that intergovernmental relations have strengthened between the federal government and municipalities. Beyond that, the interrelations between municipalities have also developed rapidly since the 2000s. Municipalities have formed hundreds of consortia where they shared costs, equipment, and staff on healthcare, environmental protection, and economic development (Maria de Souza, 2020). According to Jha (2008), at the root of Brazil’s financial decentralization problem is the lack of institutions that regulate or balance intergovernmental relations.

7 PUBLIC PERSONNEL SYSTEM

In Brazil, the public personnel system has gone through several stages. The plan for a transformation in Brazil’s public sector has led to the professionalization of the public service, following the Weberian model as its central guideline. A few regulations were introduced to value merit-based federal government employees: “fair tendering, work security and career planning” (Cavalcante & Carvalho, 2017). The number of Brazilian civil servants has increased over the years, leading to stable salaries, personal rights, and various benefits. Moreover, public employees were recruited to work until they retire, and they have the security of tenure.

The bureaucratic model sought to modernize public administration, based on the Taylorist, Fayolian, and Weberian paradigms which administrative theories imported from more developed countries. In this context, the Brazilian bureaucracy inspired by these paradigms was constituted by principles that emphasized public administration’s rationalization in search of efficiency through professionalization, formalism, and functional hierarchy. The major reform before the enactment of the 1988 Constitution, the DASP Reform brought innovations aimed at establishing a merit-based and professional bureaucracy closer to the Weberian model (Cavalcante & Carvalho, 2017). In 1938, the Central Civil Service Commission was replaced by the single-headed DASP (Administrativo do Serviço Público department). The commission’s organizational structure kept in the United States after 1883 (the United States Civil Service Commission was avowedly the prototype for the Federal Council) did not meet Brazil’s urgent needs. It was replaced by the concept of a “bureau of general administration.” However, both initiatives have achieved partial results that reinforce Brazilian public administration’s historical dilemma: partially professionalized and qualified and

partially unprofessional and clientelist (Reining, 1945: 537). Through DASP, the administrative apparatus's basic structure is promoted by instituting the public tender the rules for admission and training of civil servants. DASP has progressed as the main reform locus for the Brazilian public personnel system (Siegel, 1966). The organizational or personnel functions have been highlighted in scopes such as staff, expenditure, and performance management. According to Siegel (1966), DASP formulated as the “instrument of change.” However, by the end of the 1960s, DASP became an ineffective institution (Siegel, 1966: 53–54). The 1998 constitutional amendment made labor relations more flexible, eliminated distortions in the remuneration structure and created conditions for the adoption of contractual mechanisms. The public personnel and human resource policy which has undergone a recent improvement process, is also moving toward flexibility, performance, continuous training, and objective-oriented institutionalism (Filgueiras, 2018; Marconi, 2003). On the other hand, the greatest value of the 1988 Constitution was that it made “competitive public service examinations” mandatory for the recruitment of all public sector employees (Bresser-Pereira, 1999). Furthermore, as Gaetani and Heredia (2002) explained, after the 1988 constitutional reform, within the government apparatus, there were at least four kinds of public personnel structures (Gaetani & Heredia, 2002: 8):

- Institutions where public personnel have been recruited on meritocratic criteria by private contracts.
- Public personals hired on a patronage basis by private contracts.
- Civil servants, including ambassadors and tax inspectors, hired on the basis of merit.
- Civil servants who, by political or administrative mechanisms, have gained tenure and pension rights.

Toward the 1990s, a more “meritocracy and career-based” approach was adopted in the public personnel system. However, Bresser-Pereira (1999) emphasized that the 1988 Constitution reflected a process of bureaucratic retrenchment, but it was unrealistic. The reform increased the number of employees instead of the effective public personnel system. Permanent personnel in the Brazilian civil service are employed under the Single Legal Regime created by the Federal Law 8112 and the Unification of Labor Laws.

Unlike other recruitment systems that apply the merit mechanism, the senior and top official recruitment process takes place through the appointment of political leaders and managers using their discretion. This is called DAS system (*Direcao e Assessoramento Superiores*). The system comprises of about 22,000 positions, including most management and senior management positions and fewer senior positions (OECD, 2010:13). Those within this category can be chosen from within or outside the public service. The DAS system can be considered an output of the Brazilian presidential system. As

with other presidential systems, it is considered a continuous form of weakening the career system by allowing inadequate staff to be recruited without the need for competitive exams (Bresser-Pereira, 1999).

However, in 1990s, the centralized personnel system has been insufficient for Brazil. Brazilian public administration needed new institutions and a performance management approach in accordance with the NPM reforms agenda. In 1994 the President decided to transform the presidency's old bureaucratic secretary that managed civil service into a new Ministry of Federal Administration (FAPMI) and State Reform (Bresser-Pereira, 2015: 7). Moreover, The National School of Public Administration (ENAP) has annually conducted the FAPMI since 1996. Besides the inspirational goal, the prize has provided a wide source of data for studies and research aimed at increasing knowledge about innovation in public administration. The primary focus of FAPMI is public management activities, projects, and programs at the federal level, including the wide range of public organizations (Cavalcante, 2018, 893).

The emergence of trade unionism in Brazil is directly linked to the end of the slavery era (Menezes-Filho et al., 2013; Netto, 2016). Brazil, a country where labor was almost entirely composed of slaves during the colonial period, underwent a great transformation at the end of the nineteenth century with the abolition of slavery and the declaration of the Republic. Despite this, the trade union movement emerged in the country only in the early twentieth century with the national industrialization process (Goettert, 2014). During the Vargas Period, the national union movement took place. In 1930, the Ministry of Labor was established and in 1931 the unionization of laborers and employers was organized (Boito & Steiger, 1994; Netto, 2016). Estado Novo's constitution created regulations on the prohibition of strikes and trade union taxes, as well as union unity. With the law in 1943, important structures for the organization of unions were determined (Cassel, 2012). The Brazilian union structure is formed in the form of a pyramid that houses Unions, Federations, Confederations, and Union Centers. Confederations have a national coverage, federations have a state coverage, and trade unions have a municipality as the minimum regional base. During the military period that started in 1964, trade unionism was subjected to great pressure. In response to this period, union leaders, and labor groups from the 1970s onwards strengthened their unity (Goettert, 2014). The 1988 Federal Constitution brought more freedom to the trade union movement, removed rules, such as the need to obtain permission from the Ministry of Labor to run a union, and allowed civil servants to unionize. There are more than 17,000 unions in Brazil today and the ease of creating new unions is critical. On the other hand, Labor reform in 2017 eliminated mandatory union dues. This was a big change as this was the main source of income for the unions since the 1940s. As a result, union earnings fell by over 85%. Under the previous law, companies had to annually deduct union dues from each worker's wages, which amounted to one working day's wage (Fortes, 2018).

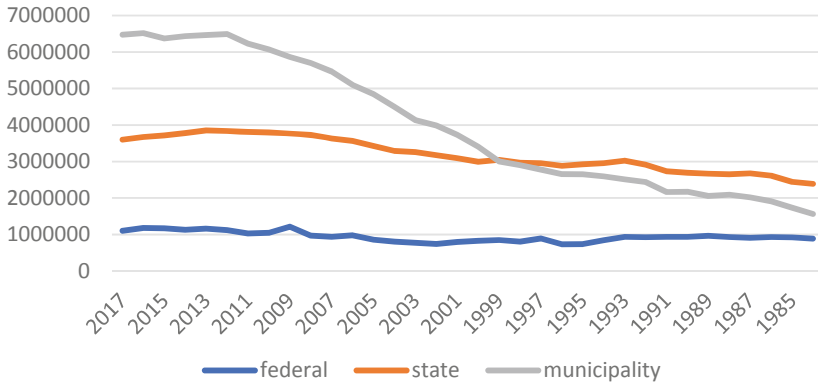


Fig. 1 The number of public employees in municipalities, states, and federal level (1985–2018) *Source* IPEA (2018)

The Brazilian public sector is heterogeneous and has changed considerably in the past three decades. (Lopez & Guedes, 2020). On the data of the Institute for Applied Economic Research (IPEA), the total number of civil servants in the country, in the three spheres of government, grew 83% in 20 years, from 6.264 million in 1995 to 11.492 million in 2016. About 12.1% of the employed population worked in the public sector in 2017, less than the average 18% of OECD nations. Although the federal government represents only 10.4% of the number of civil servants, its personnel expenses represent 25% of the total spent on civil servants at the three federal levels. The vast majority of people in the public sector work in the Executive, although the number in the Legislative and Judiciary space has increased.³ Today, reform and policies aiming to reduce the number of civil servants are frequently discussed on the Brazilian agenda (Fig. 1).

8 CIVIL SOCIETY/NGO'S

The concept of civil society in Latin America emerged as a tripartite concept adapted to the forms of differentiation between the market, the State, and society that was consolidated in the region throughout the twentieth century. Brazil's democratization and the strengthening of civil society interacted with local political factors to create the third wave of democracy (Lehoucq, 2008; Maxwell & Mainwaring, 1999). However, an important caveat remained in the use of the concept with the advancement of democratization in Brazil: the different forms of relationship between civil society and the State (Avritzer, 2012). Civil societies emerge in Brazil as a reflection of "new corporatism

³ Atlas do Estado Brasileiro. (n.d.). Retrieved March 19, 2021, from <https://www.ipea.gov.br/atlasestado/>.

and neo-pluralist dimension.” In this context, the key theme in the restructuring of Brazil’s public sector after constructional transformation centers around strengthening elements of “openness,” “transparency,” “governance,” and “responsibility” (Avritzer, 2012; Leeds, 2013; Wampler, 2012).

In historical context, Brazilian civil society organization originated primarily from the organizational ferment of the grassroots that began in the early 1960s but was disrupted by the military coup of 1964. With the re-democratization movement of the late 1970s, NGOs were once again able to grow freely. As elsewhere in Latin America, NGOs have been both a stimulus and the clearest proof of civil society’s development (Garrison, 1996: 250).

Many civil society movements and NGOs tried to actively participate in co-governance after the adoption of the 1988 Constitution (Wampler, 2012). Therefore, the 1988 constitution divided political authority, giving local governments ample resources and political freedom to reshape governance frameworks. One of the important provisions of the 1988 Constitution was the development of modern structural frameworks to design, enforce, and track public policy to assure transparency of governance (Leeds, 2013: 4).

The development of civil society in Brazil has been supported by public administration reforms. Post-1980 processes in Brazil, NPM reforms referred to participatory mechanisms in public policy formulation. In this framework, establishing a participatory budget constitutes the financial aspect of state-civil society interaction at the local level. Brazil’s progress since the 1990s and 2000s is partially motivated by the acceleration of “participatory governance” (Wampler, 2012: 359).

Democratization has contributed to the rapid expansion of civil society, which during the military dictatorship had been stifled. Participation has risen steadily in urban and rural labor unions (O’Neil et al., 2009). In addition to having a significant pressure power, Brazilian civil society has shaped democratic principles and democratic activities (Avritzer, 2012; Baiocchi et al., 2011). NGOs have an essential role in the Brazilian democratization process as they are spaces for negotiating and resolving conflicts of interest in democratic management. They also help generate a new participatory culture in Brazilian society. While NGOs support development projects at the federal and national level, they carry out joint projects dealing with Brazil’s pressing issues. Garrison (1996, 252–253) emphasized that NGOs in Brazil were generally evaluated in six interrelated frameworks of activities: “applied research,” “training and technical assistance,” “information sharing,” “grassroots organizing,” “public-policy advocacy,” and “networking.” Furthermore, Brazilian NGOs are also motivated by the desire to pursue immediate solutions to critical social issues and by a greater interest in expanding access to key decision-making venues for citizens (Wampler & Avritzer, 2016).

Brazilian civil society has a strong group of religious associations that participate in self-help activities and in the organization of the urban poor to claim public goods. These associations have a strong presence in the city of São Paulo, particularly in the east and are also strong in other cities such as Recife

and Belo Horizonte. In Porto Alegre, these groups are less strong due to the greater influence of the left sectors in the formation of local civil society (Avritzer, 2012). The groups have deep connections with a new left tradition that emerged during the re-democratization. Its strongest links are with the Workers' Party resulting in participatory policies implemented at the local level. Associations that deal with public policies are formed mostly by left-wing middle-class actors located in Brazilian cities, particularly São Paulo (Avritzer, 2012; Wampler & Avritzer, 2016). Similarly, NGOs in Brazil develop along two lines. Firstly, "religious groups, social solidarity and anti-poverty institutions" and secondly, "rational organizations" that act according to strategic and managerialism movements by the "new global market" (Gohn, 2013; Hall, 1993).

Consequently, there have been wide reform movements regarding civil society in Brazil after the Constitutional amendment. The Statute of Children and Adolescents (ECA), the Organic Law on Social Assistance (LOAS), the health reform that led to the creation of SUS (Unified Health System), the struggle for urban reform, the sectorial chambers of civil construction, the experiences of participatory budgeting in different Brazilian cities are living examples of the achievement and strength of that organized civil participation.

9 REFORMS

The 1980s was a phase of massive progressive reform across Latin American countries. Administrative reform has had an effect on all areas of the political, economic, cultural, and social behavior of each country, primarily since Latin America's transformations into democracy started in the 1980s. Throughout the 1980s, the shift from military to civilian government was crucial for shaping modern public administration in Brazil (Olavarría-Gambi, 2019: 12). Nevertheless, the process of re-democratization that started in 1985 and the change in the growth paradigm caused by the financial collapse of in-export industrial growth turned out to be uniquely tumultuous (Meacham, 1999, 41). Moreover, many significant changes have benefitted from the influences and impact of external forces and domestic pressures to decentralize bureaucratic powers, like conflictual politics and privatization. Latin America is reconsidering the institutional changes implemented during the past three decades to enhance the government system. These efforts have been focused on the "professionalization of public administration," "making strategic plans and monitoring government services," "performance management in public service," and "governance mechanisms" (Olavarría-Gambi, 2019; Yıldırım & Onder, 2019).

Brazil's administration carried out its administrative reforms mostly starting from the 1990s. In other words, the reforms generated after 1990, initiated during the government of trade opening (1990); National Privatization Plan (1990); renegotiation of external debt (signed in 1992); Plano Real (1994); breaking of monopolies and restrictions on foreign capital (1995); and the

Public Service Concession Law (1995), will be fundamental for carrying out market-oriented reforms (Leme, 2011: 348). Marketization reform in Brazil, led by the Real Plan and IMF-OECD recommendations in 1990, are mainly the result of adapting to the NPM approach (Gaetani & Heredia, 2002: 4). In 1994, the President decided to transform the old bureaucratic secretary of the presidency into a new Ministry of Federal Administration and State Reform (Bresser-Pereira, 2015: 7).

Public management reform started in 1995 with the “Plano Diretoria Reforma do Aparelho do Estado” (White Paper on the Reform of the State Apparatus) and with the executive branch submitting to Congress a constitutional amendment to the chapter on public administration of the 1988 Constitution (Bresser-Pereira, 2001: 131). With the Real Plan, radical reforms have taken place in Brazil from the new public management approach’s perspective. Furthermore, the reform movement has brought about changes in the field of “marketization and privatization.” The Ministry of Federal Administration and State Reform (Ministério da Administração Federal e Reforma do Estado) was created to lead the administrative reform process (Cavalcante, 2018: 5).

The purpose of the program, called Plano Director de Reforma do Aparelho do Estado (Cavalcante, 2018), is to:

- Improve the democratic accountability of the state, understood as its administrative capacity to govern accurately and economically, with an emphasis on public services to citizens;
- Decentralize states and localities of almost all social policies;

Transfer national policy from the Federation to States in part and foster interaction between them.

The reform movements within the new public management (NPM) framework in the 1980s and 1990s were supported by the e-government reforms in the 2000s (Laia et al., 2011; Lau et al., 2008). Since the 2010s, e-government and digital transformation reforms of the public have been the main agenda of the reform process. The reform movement includes optimization-oriented actions in terms of privatization, localization, planning, and civil services. Post-plan process neo-liberal transformation moved from the federal government to local units.

Brazilian public administration reform is considered a multidimensional reform movement that impacts many reform areas (Schneider, 2015: 116). In the historical perspective, the Brazilian reform movement is driven by the motivation to reduce the disparities between regions and land. The reforms of the 1990s focused on strengthening the macroeconomic structure and liberalizing the economy. Thus, by the 2000s, Brazil, which was on the way to becoming a global power, carried out various reforms in the energy markets (oil) and digital transformation (e-government). However, recent reforms

movement included strengthening welfare programs, digitalism (data governance and AI reforms), and reforming the financial sector to increase access to credit. In addition, recent reform motivation included the fiscal and pension structure, energy market and urban policy (Terminassian, 2012).

All in all, the reform movement is the heart of the transformation of Brazilian state capacity and public administration. The multi-faceted reform movements in public administration have an important role in the formation of Brazil's increasing economic and political power on a global scale.

10 CONCLUSION

The legacy of both the colonial period and the military dictatorship has played the most important role in shaping the country's current administrative system and in the formation of its political culture. This suggests that comparative Brazilian public administration studies, which are currently limited and inadequate, will become more important in future. However, this study mainly focused on the administrative transformation (intergovernmental relations, civil service, civil society, etc.) and reform movement in Brazil after the 1980s.

Brazil is the only Latin American country colonized by Portugal and the colonization period constitutes the beginning of the Brazilian bureaucratic/institutional infrastructure and administrative tradition. After the independence, a US-type constitution was created and the ideas of federalism and separation of powers came to force. Central government structure strengthened during the monarchy and military regime periods. Like several other Latin American nations, Brazil has a mixture of representational formulas uncommon in the advanced industrial democracies (Mainwaring, 1991: 22). Brazil has transitioned from military-authoritarian rule to democracy in the process of democratization, which Huntington (1991) mentioned as the third wave of democratization. The Brazilian legal structure takes its main normative source from the Federal Constitution of 1988, which determines the fundamental foundations and objectives of the republic, presents an extensive list of fundamental rights and guarantees, lists social rights, sets out several principles to be applied by the creators and enforcers of laws, and delimits the powers of the State. The 1988 Constitution also reflects several principles: "decentralization," "fiscal autonomy," "transparency," "participation," "social control," and "redistribution."

Brazil evolved from an agricultural economy to an industrial one, but at the time civil service was hardly the classical Weberian principle of the bureaucratic system (Uzun, 2021). Brazil's bureaucratic model sought to modernize the public administration, based on the Taylorist, Fayolian, and Weberian paradigms, which administrative theories imported from more developed countries. In this context, the Brazilian bureaucracy, inspired by these paradigms, was constituted by principles that emphasized public administration's rationalization in search of efficiency through professionalization, formalism, impersonality, and functional hierarchy. Toward the 1990s, a more

“meritocracy and career-based” approach was adopted in the public personnel system. On the other hand, the presidential system’s influence and the political differences between local governments have recently prepared a suitable model for politics-based public personnel appointments.

Brazilian civil society has a strong group of religious associations historically that participate in self-help activities and the urban poor’s organization to claim public goods. The development of civil society in Brazil has been supported by public administration reforms. Post-1980 processes in Brazil, NPM reforms referred to participatory mechanisms in public policy formulation. The growth of civil society groups and NGOs in Brazil during the transition to democratic rule was followed by the emergence of new political principles and policies that fostered administrative reconstruction at the local level.

Last but not least, the multi-faceted reform movements in public administration have an important role in the formation of Brazil’s increasing economic and political power on a global scale. Reform motivation in Brazil started in the 1930s has evolved to various points with the new public management (NPM) perception in the 1980s. Brazil’s administration carried out its administrative reform, mainly from the 1990s. In other words, the reforms generated after 1990, initiated during the government of trade opening (1990); National Privatization Plan (1990); renegotiation of external debt (signed in 1992); Plano Real (1994); breaking of monopolies and restrictions on foreign capital (1995); and the Public Service Concession Law (1995), will be fundamental for carrying out market-oriented reforms (Leme, 2011: 348). Public administration reforms, led by marketization and privatization reforms after 1980, were supported by digital transformation in the public in the 2000s.

All in all, the Brazilian public administrative system is based on different dynamics in many ways. However, the historical administrative tradition has a great impact on the formation of these dynamics (Nyadera & Islam, 2020). The federal structure with “high financial autonomy,” “participatory budgeting,” “the coalition presidential system,” and reform movements constitute the unique cornerstones of Brazilian public administration. Considering the negative evaluations (Mainwaring, Ames, Power) about the Brazilian administrative system, the large number and the weakness of parties, an electoral system that prevents democratic accountability, dominant federalism, and the high number of veto players draw attention. After 2000, in Latin America, which witnessed a new wave of democratization in the 1980s, Brazil started to be seen among the countries where the presidential system worked well, especially with Chile. However, the recent economic and political crises, voter dissatisfaction, and protests have raised doubts about the functioning of the administrative system in Brazil (Table 4).

Table 4 Comparative framework

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>	
Administrative History	Geopolitical situation	Strategic	
	Colonial history	Yes	
	Legacy of bureaucracy	Yes	
	Centralized bureaucracy	Moderate	
	Role of military	Moderate	
	Political culture	From conservative to liberal	
	Administrative culture	Participative	
	Professionalism	Moderate	
	Politicization of bureaucracy	High	
	Dominant state ideology	Populist	
Legal Structure	Nature of constitution	Written	
	Origin of constitution	Separation of Power	
	Strong constitution	Yes	
	Constitutional rigidity	Yes (casuistic)	
	Created by	civil initiatives	
	Revised by bureaucracy	civil initiative	
	Administrative judiciary System	Strong	
	State structure	Federal	
Central Government	Government structure	Coalitional presidentialism	
	Hierarchical structure	Strong	
	Local extension agencies	too many	
	Central government	Moderate	
	Coordinating mechanisms	Moderate	
	Transparent financing system	Weak	
	Monitoring	moderate	
	Independent regulatory Agencies	Exist	
	Local Governments	Financial autonomy	Strong (Participatory budgeting)
		Political autonomy	Moderate
Council types		Council mayor	
Mayors		Elected	
Decision making bodies		Exist	
Central tutelage/monitoring		not exist	
Subsidiarity principle		Exist	
Decentralization type		delegation	
Intergovernmental Relations	Logic for Division of tasks	Fair and rational	
	Tutelage/monitoring	Weak	

(continued)

Table 4 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>	
Public Personnel System	Communication	moderate informal	
	Civil services	Career based Prestigious	
	Scope of civil services	12%of civil services	
	Recruitment and promotion	Competitive and Political unfair	
CSOs/Civil Society	Nationwide exam	Exist	
	Politicization in general	High	
	Unionization	Weak	
	Size of Civil Society	338.000 6.5 million people (voluntary work)	
	Institutionalization	Weak	
	Partnership with the state	Moderate	
	Political pressure/domination	Strong	
	Major financial revenues	corporate philanthropy and operating incomes	
	Supportive national culture	Strong (religious organization)	
	Political regime and civil society relations	Strong	
Reform Philosophy	Civil society	Prestigious	
	Dominant reform paradigm	NPM reforms	
	Policy Transfer	policy adoption	
	E-government reforms	Completed	
	Artificial intelligence (AI) reforms	Exist	
	Influence of international actors	BRICS	
	New reforms (5 years)	Tax Reform	The Pension Reform
		Fiscal Reform (simplify and reduce the cost of the public sector)	Restructuring public servants' wage

Source Adapted and developed from Önder & Zengin (2022)

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Republic of Cuba

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I INTRODUCTION

Cuba is an island country in the North America and located very close to the equatorial region. It neighbors the USA, Bahamas, Mexico, Cayman Islands, Jamaica, Haiti, and Dominican Republic. The geographical location of Cuba has had an important influence on the domestic and foreign policy of the country. During the cold war, the country was at the center of a grave conflict between the Soviet Union and the USA over nuclear missile issue. Its geographical proximity to the USA and political relationship with the Soviet Union drew a lot of attention during the Cold War. After the discovery of America, the Spaniards first settled in Cuba and started to dominate over the country which lasted for 400 years.

In this chapter, we begin with administrative history and the roots of administrative tradition of Cuba. We also examined emergence and development of bureaucracy in the country. Later, we analyzed central institutions of the government including financing structure and the position of head of the government, and the scope of the central government. After this, we examined

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local governments and relations of the local governments with central government. The chapter continues with public personnel system, NGOs and civil society, and recent developments in public administration. The time frame of the chapter is from the inception of the Spanish Domination to the present.

2 ADMINISTRATIVE HISTORY

Cuban public administration has been developed with the influence of various civilizations. Spanish domination over 400 years, 4 years of American direct control, and more than 50 years of indirect influence and the socialist influence after Bolshevik revolution are seen intensely in the present public administration. However, no effective public administration was established until the end of the 1960s in the country.

2.1 *Roots and Development of Administrative Tradition*

Colonialism played important role in Cuban political life. The Spanish colonial forces ruled over the country 400 years (BBC, 2018). Later Jose Marti, the founder of the Cuban Revolutionary Party in 1895, initiated a war of independence against the Spaniards. The effects of the colonial period, the war of independence, and the American invasion shaped the modern public administration in Cuba. However, the concept of this modern public administration became a centralized kleptocracy regime under American direction (Farazmand, 2001; Nyadera & Islam, 2020). The American military governors tried to minimize the effects of long colonial rule and the war of independence. For this purpose, they tried to discipline public finance and personal control. Although they tried to control public finance, it could not be achieved effectively. One of the main reasons of this failure was the indiscriminate practice of bribery and corruption. State expenditures rose up to 600% by 1922; by 1923, annual defrauding of the public treasury amounted to \$15 million. By 1950, 80% of the central budget was spent for salaries and a third of all employees were blamed for doing no work (Farazmand, 2001).

The effect of the USA could be seen directly by the 1930s in the public administration of Cuba. The USA could have intervened in the Cuban administration if there was any disorder in the public administration depending on an article of the Cuban Constitution of 1901. The Cubans were ruled by the presidents controlled by American government in the 1930s. However, the USA could not succeed to save Gerardo Machado who was the proponent of American policy in the region. Fulgencio Batista took the political power through the American support. American direct intervention policy toward the Cuban administration was changed to a neo-colonial policy after the Batista revolution. The USA was an important hard power in the region which gave it leverage to intervene public and political administration of Cuba. After the 1933 revolution, the Cuban public administration tried to get rid

of the economic and political dominance of the USA through some regulations; however, it was not possible due to the high economic dependence on the latter. The US-controlled political agenda compelled Cuba to embrace a dependent capitalist economy.

The rotten system continued to prevail in the Cuban public administration before the revolution. Political authorities went under the influence of corruption and dirty politics became an industry. Lack of sufficient technical experts in the public administration was also remarkable. The 1952 census counted only 86,000 technical and professional employees, and the majority were attorneys or from arts; within a sum of 2 million workforces, there were only 2500 engineers. Through the 1940 Constitution, Cuba revised the public personnel system and they established some institutions to improve financial efficiency (Farazmand, 2001). Despite all of these efforts, Cuba could not achieve to empower merit system and increase the number of technical personnel in the public administration.

The roots of administrative system highlight largely political aspects (Islam et al., 2020, 2021; Nyadera & Islam, 2020). Therefore, we can examine the pre-colonial administrative structure and then explain how the public administration system functioned during and after the colonial period. For example: what were the key administrative units, who were in charge of what, which laws were used, etc. However, it can be merged with the section on emergence and development of bureaucracy.

Radical developments occurred in public administration after the revolution. More than a hundred public employees have been dismissed from their offices (Farazmand, 2001). The revolution has also changed many public policies. It was necessary to establish new institutions comply with changed public policies. At the beginning of the Castro administration, the constitution was abolished, and the Republican Basic Law was created on February 7, 1959. Especially, agricultural reform was so important. National Institute of Agrarian Reform agency, Institution of Controlling Agriculture was established. Many state activities were conducted through this institution. Land distribution, health services, road construction, and housing were some of the tasks. National Institute of Agrarian Reform agency was led by the army.

After 1960s, the bureaucracy became more efficient than it used to be. The vast majority of agricultural areas handed over to the state together with private enterprises. Central planning has become very effective in the Cuban economy. The Soviet model of bureaucratic planning put into effect. In 1963, 60% of the country lands were nationalized.

The post-revolutionary public administration of the Cuba was defined as “guerrilla administration” by Che Guevara. Guevara means describing ineffectiveness that arises as a consequence of the lack of public personnel. Such guerrilla administration, without the necessary technical knowledge, made a chaotic and ineffective public administration. In the 1960s, state took a great effort to get rid of these unqualified public personnel. However, the Cuban state failed to establish hierarchical relationship between institutions. Public

administration was developed with idealism, not by the system. State has not been coordinated well in most areas. Emergence of the Cuban Communist Party in 1965 was the result of lack of coordination. Aim of the party was establishing social awareness for the communist regime and protecting the regime against anticommunist propaganda. Between 1965 and 1967, there was hardly a criticism against Cuban bureaucracy. During this process, many officers were thrown out from the offices. Cuban Communist Party could not achieve its aims with the administration of Fidel Castro, and in those years, Castro continued to remain in the position of problem solving.

Cuban Revolutionary Party has played significant role in the country's political and administrative system. The party increased its power upon the political system with the participation of important military figures such as Maximo Gomez and Antonio Maceo's. All other political organizations against the Batista regime united with the movement and initiated the revolutionary process and eventually established a party in the name of Cuban Communist Party (PCC) (Hernandez, 2010). All the political parties in the country were dissolved at the beginning of 1960s and the party emerged in 1965 when these three movements were combined (Encyclopedia Britannica, 2018). The Cuban Constitution defines the party as the driving force of the society and the state. According to the fifth article of the constitution, the Cuban Communist Party is the follower of Marxism-Leninism and Marti's ideas, and organized forerunner of the Cuban nation and it represents the highest leadership of the society and the state.

The party organizes and directs joint initiatives aimed at building socialism and progressing toward communist assembly. The general secretary and leader of the party is the leader of the country. In addition, many congressional members are also become parliamentarians. Although candidates were to be elected to their offices, the party's local organs are highly active in the process of nominating candidates. During the process of nominating candidates, the party benefits from various federations. The function of the party is the collective political and ideological leadership (Saraçoğlu, 2016). There are only a few ways to join the party. There is an ideological investigation that lasts six months after the party membership process has begun. On the other hand, the party's local organs have a serious influence on the deputies they elect. They can recall if it is necessary. The party has a very wide network from non-governmental organizations to the media (Library of Congress, 2001). Most of the educational materials contain ideological expressions. However, education is also used as a tool to increase the loyalty of children and their families (Freedom House, 2018). The party has strictly regulated civil society and social movements (Lopez & Chaguaceda, 2018).

Years of 1970s and 1980s have been the years in which Cuban public administration system has begun to regulate. Unlike in the post-revolutionary random model, public personals were more adapted to the system. A system based on central planning and coordination in economic management was developed. Long-term planning, budgeting, and cost and profit analyses were

done. The Economic Management System was established in 1977; workers were involved in economic management more actively. The Communist Party played an important role in the development of the public administration. Until 1975, Cuba was the only socialist country without elections, referendum, party congresses, or parliamentary meetings. The same political power managed the country for 15 years. In December 1975, first congress of the Cuban Communist Party was held and a draft constitution was adopted. The draft, which received 97.7% of the referendum in 1976, approved as the first Socialist Constitution in the country.

A radical change in the political system has begun in 1976. After a two-year trial period, three-tier local government system was put into practice. Decentralization policies dominated public administration reforms in these years. Moreover, some important political powers of the central government were transferred to the local governments. At the national, provincial, and local levels, assemblies of elected delegates are expected to represent the population and to oversee the administration of specific activities within their jurisdiction. Local assemblies manage local service units. Thus, the management of 75% of commercial and public facilities, 86% of educational units, and 50% of healthcare units transferred to the municipal level (Farazmand, 2001). Another important development in public administration was the efforts to decrease the lack of the technical public personnel. Farazmand (2001) states that there were two important developments: opening schools for technical training of administrators and increasing quality of existing public personnel. For this purpose, the school of “A National School of Economic Management” was established in 1976 and soon many bureaucrats graduated from the school. The single-minded administration seen in the 1960s was no longer possible in the 1970s due to the election system.

In the 1980s, the government launched a new improvement process in order to eliminate policy failures. This process, which began to be debated in the third congress of the Communist Party in 1986, aimed at eliminating problems and errors on public administration, by closing the deficits of the planning system and training the officers of the public administration. This process was named as a Rectification of Errors and Negative Tendencies.

3 THE LEGAL STRUCTURE

According to the Cuban Constitution, Cuba is an independent and sovereign socialist workers' state that depends on political freedom, social justice, individual and collective prosperity, and human solidarity. The Communist Party has a very important place in the executive body of the state. Cuba central government has a unitary structure with very authoritarian tradition. Political system combines a highly restricted structure of policymaking authority in which some 22 individuals participate regularly in setting national policy with a decentralized system of policy implementation that involves substantial popular participation at the local level (Library of Congress, 2001).

The political system of the country is a one-party communist system and the party has a very significant power. Party leaders are also the leading political figures of the country. It is not possible to see this very often in practice, even though it is alleged that the forces are separated. Head of the state is also the chief of the government. At the same time, he is also the supreme commander of the army and the leader of the Communist Party.

The legal structure of Cuba constitutionally consists of three main branches as shown in the Fig. 1. Legislature is the most powerful branch when compared with the constitutional power of the branches.

At the top of the hierarchical order is National Assembly of People’s Power. This means that the legislature is more powerful than other branches as shown in the graph (Hierarchy Structure, 2021). And then, the president, the council of state, and the cabinet come. The judiciary seems to have less power. Based on the administrative division of the country, the judicial system consists of three parts. Supreme Court is at the top of the judicial system. The subordinate courts are more local and downscaled. Subordinate courts include provincial courts and municipal courts. Supreme Court is the final for legal decisions. The Supreme Court also judges crimes committed against the state and Cuban national security. Although not mentioned in the constitution, the decisions of the court are the bindings for all state authorities. The Minister of Justice may attend the meeting but has no authority to vote. The Supreme

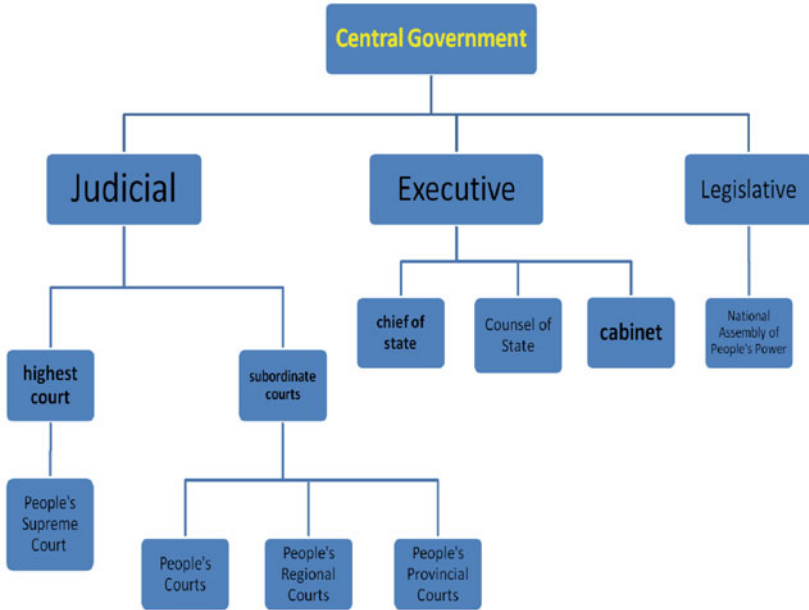


Fig. 1 Branches of the Government (Prepared by the Authors)

Court's governing body is responsible for arranging relations with ministries and subordinate courts in a harmony.

Unlike the other judicial systems, the attorney generals are appointed by the National Assembly of People's Power. The extreme political power of the Assembly has prevented the establishment of the independent judicial system. The National Assembly may easily establish tutelage upon the judicial system. Even worse, the assembly is not supervised by the judicial authorities. Although the council of state has fulfilled this task, it has no constitutional ground.

4 CENTRAL GOVERNMENT

Cuba is a socialist state. It makes central government extremely powerful. Everything is strictly connected to this central government, including the local units. The government can easily control other branches. Judicial system consists of highest court and subordinate courts. Subordinate courts are divided into three subtitles. It is a kind of three-tier system. People's courts are the easiest one to reach. Executive branch consists of three important administrative units. These units are: president, council of state, and council of ministers. National Assembly of People's Power is the legislative branch of the country.

4.1 *Legislative System (National Assembly of People's Power)*

The assembly is the highest governing body in the country. Cuba holds general elections every five years since 1976. Deputies serve for five years. The participation rate has not fallen below 90% except for the last national election. The assembly consists of 614 seats, but that does not mean they're all going to be filled. For example, 605 seats were filled in the last election. For vacant seats, the Supreme Court calls again for the election and they again race for the vacant seats. Deputies are directly elected by absolute majority vote. The number of delegates in the assembly is based on a principle to a delegate for every 20,000 citizens. Every citizen who is 16 years of age has the right to vote in the elections. Unlike municipal and state elections, they cannot be candidates until the age of 18. First condition of being a member of a parliament is to be able to vote. The other condition for being a candidate for parliament is to live continuously for at least 5 years within the borders of the Republic of Cuba. Candidates are identified by candidature commission. This institution is different from the party structure, but nevertheless, the Communist Party is very active in the process of nomination. As will be mentioned later, a federative method is applied in the elections of the country (Denktaş, 2012).

The assembly has some duties related to legislation period such as passing laws or changing constitution. Assembly chose state council members and ministerial board members. The president and vice-president are elected by

the parliament as well. Supreme Court judges are also elected by the parliament. Members of the assembly are gathered twice a year at ordinary sessions and also at special sessions, where necessary, by the request of one-third of the members or by the invitation of the state council. According to the law, parliamentary duties can be canceled by voters at any time of the year (Hernandez, 2010).

4.2 *Judicial System*

Supreme Courts: The People's Supreme Court consists of a president, vice-president, and members of five chambers. These chambers are: criminal, civil and administrative, labor, crimes against state security, and military. Each chamber comes from various members. These members are: president, two professional judges, and two lay judges. The governing body consists of the president, the secretary, the minister of justice, the president of the five chambers, and the attorney general. Judges of the Supreme Court are elected by the national assembly, but the president and his assistant are nominated by the council of state. However, the approval is again made by the National Assembly. The National Assembly assigns these judges for 2.5 years, but NAPP can recall if want to do it. However, situation of the lay judges is different from professional judges. Again, these judges, chosen by the National Assembly, do not function as normal judges. They work for 4 months in a 2.5-year period, and they are not authorized to give the general sentence to those thought to be guilty.

Subordinate Courts: Provincial courts and municipal courts are the sub-institutions of supreme courts. Each province selects their judges for a period of 2.5 years by their own local council. Being a judge in the provincial courts requires the approval of the Ministry of Justice. There are five chambers like Supreme Court. These courts have one professional judge in the chambers as different from the Supreme Court. Another difference from the Supreme Court is that the authorities of lay judges are wider here. There are municipal courts under the provincial courts. Every one of these courts refers to one court for 169 municipalities in the country. Judges are elected by the local councils as if they were in the provincial court. Similarly, they must obtain the approval of the Ministry of Justice. They are very similar to the provincial courts in structure. But the only difference is that there are no chambers in the municipal courts. These courts are the courts for simple cases. Important cases like general security matters are not able to be judged in these courts. Another important type of court system peculiar to the socialist system is the labor courts. It is the type of court that must be established in the workplaces where twenty-five and more workers are present. If there are fewer than 25 workers, the workers will be directed to the nearest court. The members of the court are elected by the workers' assembly for a period of three years and can be recalled by the assembly. These courts are obliged to resolve disputes between the employer and the employee (Library of Congress, 2001). The

office of the attorney general is not different from other systems in terms of duty. They are obliged to classical duties of the prosecutors in other justice systems.

4.3 *Executive System*

4.3.1 *Administrative Position of Head of State*

Although it seems to be at the bottom of the hierarchy table, the president holds extraordinarily strong role in the administration. He is the chief of the state and head of the government. He is not just the leader of the state in the same time, he is the leader of the council of state, council of ministers, the army, and the Communist Party. This makes him much more powerful; however, separation of powers is destroyed by this extraordinary power. As a result of the elections held in March 2018, Castro's family administration, which has been in operation for more than 50 years, has come to an end. After Fidel Castro and Raul Castro, Miguel Diaz Canel became the president and Castro era ended with this election. The president is elected by the parliament. The term of office is 5 years (CIA, 2021).

4.3.2 *Council of the Ministers*

It is the highest administrative and executive body of the country. Members of the council of ministers are elected by the parliament such as the member of the council of states. The council is responsible for making administrative arrangements and carrying out the internal and external policies of the country. The council has to submit draft budget to the assembly. At least half of the ministers must be present for the session. The decisions are made by the majority vote.

The duties and responsibilities of the ministers were determined by the 1976 Constitution. These duties and powers are stated in Article 100 of the constitution such as: to carry out the tasks and duties of the ministry or institution under its jurisdiction, to take the necessary decisions and make provisions, and to issue regulations for the enforcement of the laws and statutory decrees in cases where the jurisdiction of another state body is not in charge. In addition to this, they should attend meetings of the council of ministers with the right to speak and vote, and to present the council a draft law, decrees, decisions, or other proposals to which it may refer. It is also the duty of the ministers to make civil servant appointments to related offices and maintain to fulfill their duties and responsibilities (Fig. 2).

4.3.3 *Council of State*

The council of state consists of 31 members elected by the country's national assembly. There is no legal basis for choosing of the members inside of the parliament. If the council prefers, members can also be elected from the outside of the parliament. Practically, members are usually selected within the

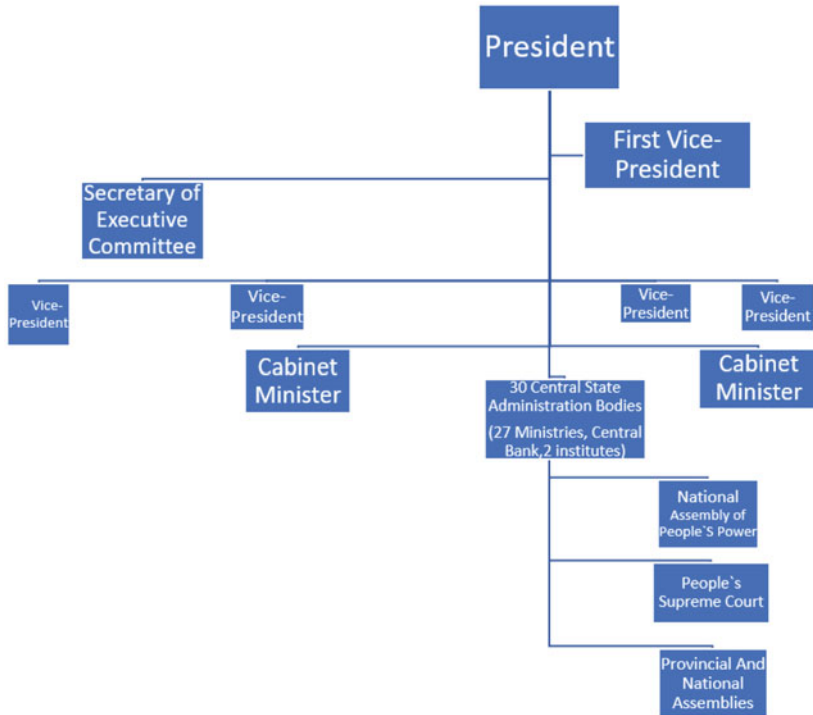


Fig. 2 Council of Ministers (Prepared by the Authors)

assembly. Council consists of sub-units like president, vice-presidents, minister-secretary, North American affairs, office of historical affairs, executive assistant, and legal advisers (Directory of Officials of the Republic of Cuba, 1985). The leader of the council of the state is the president. The most important duty of the council of state is to convene in cases where the assembly cannot meet. In such a case, the council of state can have most powers of the NAPP by issuing decrees. In addition, if the parliament and the local governments act contrary to the law, they may exercise their duties. Besides this, if the assembly is unable to meet, council can declare war. Other important duty of the council is that if the president die or unable to serve, vice-president of the council would take over his office. Another important task of the council of state is to appoint the National Election Commission and follow its activities. The council of state must announce 120 days before identified the election day for any selection in the island. Election commissions can be established after the following announcement of the council of state (Denктаş, 2012). Council of state, despite appearing behind in the hierarchy, has a strong position like situation of president in the hierarchy. Since 1979, council of state has increased its power because of issued decrees. These decrees have the same strengths with the law. Moreover, assembly can convene four times a year, while the

council of state can meet whenever it wants. It is clear that the implementation of the system is effective, not the hierarchy shown by the laws (Library of Congress, 2001).

4.4 *Independent Agencies*

The State Committees: The state committees are responsible for more specific assigned issues. It is based on sectoral expertise and ensures harmonization and coordination of sectors. There are important state committees in the country. For example, the Committees for the Defense of the Revolution (2021) exist to promote social welfare and report on counter-revolutionary activity, and it is organized as blocks, neighborhoods, municipality, provincial, and national sections.

National Institutions: These institutions are considered within the central government, but the presidents of the institutions are not included in the council of ministers (Library of Congress, 2001). The state uses these institutions in order to control the policies more effectively.

4.5 *Local Organization of Central Governments*

Local governments consist of 14 provinces and 169 municipalities. Central government has a very strong impact on local governments. The party is very effective in local governments as well as in all systems. It allows the state power to populate all sub-local units (Library of Congress, 2001). The main unit that provides the link between local and central government is the municipal and provincial assemblies. Each member of these assemblies can represent local units in upper assemblies. A candidate who is a member of parliament in the neighborhood can be elected as a national parliament and form the central government. The central government cannot assign any governor to local unit. Each local unit chooses its own governor. This is one of the efforts to localize after the 1970s, as mentioned before. Similarly, municipalities are not appointed by the central government.

4.6 *Financing System*

The responsible tax agency for taxation is the National Tax Administration, the sub-unit of the Ministry of Finance. Everyone is obliged to calculate and send tax to this institution. A specific tax period has not been identified in the country. The taxation of workers can also be done by deducting them from their salaries. Financial and judicial penalties can be applied as a result of non-payment of taxes (Expertfocus, 2021). World Economic Index data show the tax burden of the country as 49%. This ratio, which has reached to 61.8% in 2011, has decreased significantly in recent years. The share of the tax burden to the country's income is 41.2%. There is no Value Added Tax and Capital Gains Tax (Heritage Foundation, 2018).

5 LOCAL GOVERNMENTS

Public administration has strong central power with reflections on the organizing and functioning of local governments (Onder & Nyadera, 2020). The ideological administration of the revolution has a big effect in this situation. In addition, an important decentralization policy has been introduced since the 1990s (Alfonso, 2001). Some ministries and government agencies are highly influenced from decentralization policies such as the Ministry of Education, the Cuban Institute of Radio and Television, the Ministry of Foreign Trade, the Ministry of Light Industry, the Ministry of Agriculture, and the Ministry of Justice. Some responsibilities of these institutions delegated to the lowest municipal councils and provincial councils in the area. According to the Principle of Double Subordination, institutions are responsible to both the local governments and the central administration through their affiliated institutions (Library of Congress, 2001). Those that work for the municipality should depend on the Municipal Assembly; those that work for the province should be transferred under the authority of the Provincial Assembly; and those that work for the whole country remain on the hands of central organizations (Lopez, 1999).

5.1 *Scope of Local Governments*

Cuban local government system has changed to weak mayor and strong council model after several reforms. Duties and responsibilities of the local governments and assemblies are explained in the 11th and 12th articles of the Cuban Constitution. These are:

- to perform the functions of the state in the relevant borders of the local government,
- to assist in the development of the activities and the fulfillment of the plans of the units which are not subject to it but located in their territory,
- to provide economic needs of the collective within its borders and jurisdiction,
- to ensure health, support, education, culture, sports, and recreational services like garbage collection,
- to manage production and service foundations which, economically dependent to local governments
- to provide coordination of the work of the enterprises located in the activity areas and encouraging cooperation between these enterprises and supervises their activities,
- to encourage participation of people and local initiatives for solution of their own problems in the broadest sense,
- to increase efficiency in the development of production and service activities.

Although duties and responsibilities of local governments seem broad, the central government strictly supervises local governments and they cannot fulfill their functions freely.

5.2 *Local Administrative Units*

Cuba is divided into provinces and municipalities due to political-administrative purposes, and their numbers, borders, and names are determined by law. According to the 1976 Constitution, Cuba has 14 provinces and 169 municipalities. The Isle de Youth municipality is an exception here. This municipality is directly connected to the central government.

5.2.1 *Organs of Local Governments*

Cuba has a three-tier local government system. Popular councils are on the descendent level. These councils manage towns, villages, and neighborhoods. Municipalities, which constitute towns, villages, and neighborhoods are in the upper level. Management is conducted by municipal councils in this level. The top of the local government structure is a provincial administration. The administration of this level is conducted by provincial councils. These councils establish municipal and provincial commissions to ensure the efficiency of production and thus supervise the production units. Municipal and provincial assemblies have some tasks related to justice system. Assignment of judges and removing them of the local courts are the important duties (Library of Congress, 2001). The management of all these assemblies is carried out by the executive committees of these assemblies.

Popular Councils

Popular councils are smallest administration units in this three-tier system and these councils are the closest administrative units to the public. Duties and responsibilities have been determined in Article 104 of the Cuban Constitution. Selected delegates can be elected to a higher council, that is, the municipal council. All popular council units consist of at least five regions. However, it might be established less than five regions in some exceptional situations. The president and vice-president of the council are elected by the council's delegates. Representatives of the mass organizations and the important institutions in the region can also be included to the councils. The president is elected by the majority vote. However, the president of the municipal council may be nominated as an exception of this rule (UN, 2017).

Municipal Assemblies

According to Article 102 of the Cuban Constitution, the municipalities are local communities with legal personality with all legal influence. It is structured to fulfill the economic and social relationships that the population requires. It has been politically organized by law to have the capacity to meet minimum local requirements. In addition to fulfilling their functions, the provinces and

municipalities also contribute to the realization of the aims of the state. Municipalities are higher levels of the neighborhoods and villages hierarchically. The most competent body in the administration of municipalities is municipal assemblies. Executive committee acts like a government. Executive activities of the municipalities are carried out by this committee. The mayor is elected by a majority vote among its delegates. The president represents the municipality as head of the executive body and fulfills the duties assigned by the law. Assembly members shall be elected for a term of 2.5 years (UN, 2017). The municipal councils determine and supervise the functions of 169 municipalities including all settlement units of the island. Each municipality is responsible for the social and economic well-being of the people living within its administrative boundaries. They are obliged to check and fulfill needs and requirements of the people who live in their municipality and financial resources and budget fulfilling these needs and requirements (Denктаş, 2012).

Municipal assemblies are designed on the basis of one representative for every 500 Cuban citizens. Another important feature of the assembly is that candidates, who delegate municipality in national and provincial assemblies, must be approved by these assemblies.

Provincial Assemblies

Article 102 of the Cuban Constitution defines provincial management as the same as municipalities. The province is a local community with legal entity with all legal influence. It is a political connection between central and local governments. It fulfills administrative responsibilities and functions within its authority, and its main task is to improve economic and social development within its borders. To this end, it ensures coordination and supervision of the implementation of policies, plans, and programs established by higher-level organs, taking the support of municipalities and taking into account their interests. There are 14 provinces in Cuba. Each province is governed by the provincial assemblies. Assembly must have at least 75 deputies and these deputies serve 5 years. Executive committee is the governing body of the assembly. The committee serves as the provincial government. The executive committee elects a president and a vice-president among the members. The elected president is equal to the governor in terms of duty.

Delegates of provincial assemblies are directly elected by the provincial public from candidates nominated by the municipalities within state borders. The system is designed on the basis of a deputy for population between 10,000 and 15,000. This measure is equal to one deputy for 15,000 people in any province with a population of over 1.5 million (Denктаş, 2012).

5.3 Financial Structure of Local Governments

Local governments in Cuba have limited economic resources when compared to their political responsibilities and duties. Some duties and responsibilities

of central government have been attended to local governments with decentralization policies. Their responsibilities and duties vary from health to the protection of the environment. The socialist government has not provided any information on the resources of local governments. The central government has never published financial statistics of local governments. Only, there are some indications that gathering small number of the taxes at the local level is directed to municipalities without channel of the central government (Hernandez, 2010). However, it is estimated that the income of all local assemblies is 20% of the state budget. However, local governments have no chance to increase the budget. There is no local financial autonomy. It is another important indicator for the domination of the central government upon local governments.

5.4 *Auditing of Local Governments*

The assembly has both responsibilities within itself and through the higher assembly. Popular councils are supervised by municipal assemblies. Municipal assemblies are supervised by provincial assemblies. Provincial assemblies are supervised by national assembly. Local authorities can be supervised and audited by the central government easily in this way. This is not the only auditing way of local governments. Public are able to supervise local assemblies as well. It is provided by the Assembly for Rendering Accounts. This institution meets every four months in the municipalities and listens to the requests, suggestions, and complaints of the people. It votes the necessary ones and reports them to the higher units. In the next session, the issues of the previous session must be attached to the verdict. If necessary, deputies may be taken from the office by this institution (Library of Congress, 2001).

6 PUBLIC PERSONAL SYSTEM

Cuba's public personal system is founded on its socialist ideological framework. Unfortunately, the system suffers from corruption claims. Although the Cuban leadership has stated unequivocally that it will not stray from the path of socialism and privatization is out of the question, the latter is, in fact, already occurring through a method that is the very essence of corruption, being the outright theft of public assets by politician and/or enterprise directors (UNPAC, 2007). According to the Corruption Perceptions Index for the year 2017, the Cuban personal system ranked 62nd out of 180 countries with 47 points. When compared to 2012 data, rank of the country is down to 4 places (Transparency International, 2017).

The legal basis of civil service in Cuba is Article 10 of the 1976 Constitution. All state institutions, their leaders, officials, and employees operate their operations within the limits of their own jurisdiction, and they are under the obligation to strictly observe the socialist legitimacy and to protect the dignity of this legitimacy in the context of the society as a whole. According to the

research of the Japanese Embassy in Cuba, 70% of the Cuban population is a state official. Equality can also be recognized among the civil servants in terms of salary. However, for the higher level of civil servants, which technical information is required such as doctors, engineers, etc., situation is a little bit different than the usual civil servants. Their salaries averagely \$ 13 more than other salaries. On the other hand, the state has restricted the rights of senior officials to many points. These officers have to obtain permission from the central government even when they go abroad (Furuichi, 2018). According to 46th article of 1976 Constitution, all employees have an eight-hour working day. Weekly holidays and annual paid leave have the right to rest, which is guaranteed by the government. The state will support the development of holiday plans and facilities. As seen here, the state equals working conditions without distinction between civil servants and private sector workers. As described below, the same situation applies to matters about social security. Civil servants have two main problems: insufficient salaries and intervention by the central government.

6.1 *Human Resource Management in Public Sector*

We examined some significant aspects of the human resource management in public sector of the Cuba. These processes are known as “Recruitment,” “Promotion,” “Training,” “Gender,” and “Remuneration.”

We examined some significant aspects of the human resource management in public sector of Cuba. These processes are known as “Recruitment,” “Promotion,” “Training,” “Gender,” and “Remuneration.”

Recruitment: According to the Resolution No. 8/2005 of General Regulation over Cuban Labor Relations, merit principle is the most important criterion for being public officer. Persons working in any area should prove their specialization with a certificate. Furthermore, the state cannot discriminate on recruitment of women, children, and the disabled (UNPAC, 2007). Article 45 of the constitution says that working in a socialist society is a right, a duty, and a source of pride for every citizen. The provision of work is given by looking at quality and quantity. The needs of the economy and society, the preferences and skills of the workers are taken into consideration. Every worker is obliged to fulfill his / her duties with loyalty in his work.

Promotion: A system of management of the public service guarantees that the success of the career of the public servant is determined by the degree of efficiency of his or her performance and professionalism (UNPAC, 2007).

Training: The education of civil servants in Cuba is done by the Ministry of the Economy and Planning. This ministry is responsible for making the officials more efficient. They are tasked with ensuring the need for qualified staff in the public sector by increasing their quality. The Ministry has opened several schools to train qualified personnel since the 1970s since the need for qualified civil servants after the revolution was one of the main problems of public administration (UNPAC, 2007).

Gender: Women cannot be subjected to discrimination against men is guaranteed by Article 44 of the constitution. According to the constitution, women and men have equal rights in the economic, political, cultural, and social spheres as well as in the family. To achieve full participation of women, the state guarantees that women have the same possibilities and opportunities with men. In addition, the constitution gives the mothers an opportunity of maternity leave up to one year after birth. According to FMC's 2011 data, the participation rate of women in all sectors is 47%.

Remuneration: The social security system protects workers and their relatives working in the state, private, and co-operative sectors. The Social Security Act protects the social rights of civil servants. Retirement works are carried out by the State Labor and Social Security Committee. Everyone can retire after at least 25 years of work. The age of retirement is 60 years for men and 55 years for women. The State Labor and Social Security Committee made the most recent regulation on the pensions of civil servants in 2005 (Hernandez, 2010).

6.2 *Unionization in the Public Personnel System*

Cuba supports participation to mass organizations such as CTC and FMC since it is a socialist regime. Worker unions are in the head of these mass organizations. Since the vast majority of the population is civil servants, there is no distinction between private sector and civil servants in participation of the unions. 96.3% of the working population is unionized. CTC is the largest labor union in the country (FITA, 2021). Workers' union is composed of three councils at each workplace. These are the production council, the business council, and the management council. Proposals and plans of the workers concerning the production are the main title of political agenda of production councils. Participation of the workers to the council, which is held every two months, is very high. There is no binding regulation to participate in the council. The workers' council brings together representatives of the workers and administration. Management council is composed of the participation of important unions such as CTC and FMC (Library of Congress, 2001).

The Confederation of Cuban Workers (CTC): CTC is the most basic organization representing workers in Cuba. CTC is not a group that advocates workers only in the sense of trade union rights. It also makes connection between politics and laborers (Thale & Boggs, 2013). It is actively involved in the process of nominating candidates to parliament, along with some other federations. It has councils at municipal, provincial, and national levels. CTC is a confederation formed by the 19 federations. Leading sectors in their field come together and form the CTC.

7 NON-PROFIT ORGANIZATIONS

The establishment of any non-governmental organization depends on the permission of the Ministry of Justice. The Ministry of Justice rarely permitted

to the non-governmental organizations established after 1997. According to 2007 data of the United Nations, there are 2200 non-governmental organizations registered in the Ministry of Justice. However, it is estimated that this number can be doubled with unofficial non-governmental organizations. Establishment of foreign NGOs depends on the approval of the government. Nonetheless, the non-governmental organizations are rigorously supervised with some institutions under the pretext of state interests (Lopez & Chaguaceda, 2018). The state only allows socialist NGOs. The state also strengthens socialist ideology with mass organizations while controlling them. The media is also an important mass organization, but it is under the control of the state such as other organizations (Table 1).

Committees for the Defense of the Revolution (CDR): The CDR has approximately 8 million members. It includes more than 80% of all Cubans over 14 years of age. On September 28, 1960, CDR was established as a reaction to counterrevolution. Major aim was to protect the revolutionary administration. Members have some duties such as fighting against the enemy, providing political education for the public, to leading voluntary blood donation, and collecting raw material resources (Hernandez, 2010). The organization of the federation begins with the lowest local unit, the neighborhood, and hierarchically goes to the central government. When the institution was established, the main task was to provide security. However, after a while, this task was taken away and transferred to another institution. Raul Castro has reacted to this situation and has ensured that the safety becomes the main task of the institution again. It does not have the obligation to join like other committees (Library of Congress, 2001).

Table 1 Most important professional organizations in the Cuba

<i>The most important mass organizations in the Cuba</i>	
<i>The Confederation of Cuban Workers (CTC)</i>	<i>High School Students Federation (EFEM)</i>
Committees for the Defense of the Revolution (CDR)	Jose Marti Predecessor Organization (OPJM)
The National Association of Small Farmers (ANAP)	Cuban Journalists Association (UPEC)
Federation of Cuban Women (FMC)	Union of Cuban Revolutionary Warriors (ACRC)
Federation of University Students (FEU)	Cuban Association of National Authors and Artists (UNEAC)
The Young Communist League	National Union of Cuban Jurists (UNJC)

Source Cuba: a country study/Federal Research Division, Library of Congress

Federation of Cuban Women (FMC): The Cuban Women's Federation was founded in 1960 with the participation of relatively 70.000 members. Today, 80% of women who have completed the 14th age of the Cubans are members of the FMC. Membership requires active work for FMC. The federation has over 74,000 branches and agencies spread across the entire island. The actual number of local units is 175. The responsibility of these units is regularly preparing reports and presents them to the women's rights committee in the National Assembly. The committee is directly controlled by the FMC, and secretary of the committee is also the president of the committee. The General Assembly, the highest body of the FMC, meets every five years and elects the National Committee. The task of the National Committee is to implement the decisions taken by the General Assembly for a period of five years. The National Committee also elects from their members to FMC president, who will represent the FMC at the highest level and fully authorized. The National Committee meets at least once in a month. The Committee also elects secretariat members who are authorized to monitor and supervise the activities of the federation. The Secretariat conducts its work through units in the name of "assistant bureaus." The permanent staffs working in these assistant bureaus also directly depend on the secretariat (Denktas, 2012).

National Association of Small Farmers (ANAP): It was established in 1961 to represent agricultural workers and peasants. Responsibility of the association is the planning of all agricultural activities.

8 RECENT DEVELOPMENTS AFFECTING PUBLIC ADMINISTRATIVE STRUCTURE

New developments in public administration have been taking place in Cuba since the 1990s. While this process carries its own unique character with some aspects, it also reflects the general tendencies of the period. The disintegration of the Soviet Union in 1991 accelerated the reform process. On the other hand, the normalization of relations with the USA and transition to the market economy constitute main reasons for the new reforms. Therefore, we can divide the new reforms in public administration into socio-economic public reforms, which shift from the socialist system to the market economy, and general political and systematic reforms.

8.1 Basic Changes and Reforms Affecting Administrative Structure

Amendment of Election System (1992): After the Soviet Union was dispersed, the reform process started in Cuba. The first radical change in public administration was experienced in 1992. The Cuban Parliament has accepted constitutional amendments that have led to the transition to a new electoral law. The new law led to the independent nomination system by pulling out Communist Party from the election process. Before this change, the elector could only elect a delegate for the local assemblies. The Communist Party was

able to choose its own candidates. With this amendment, the deputies for the National Assembly and the Provincial Assembly began to be directly elected by the people. This change was the last circle of decentralization policies that began to develop in the 1980s (Denktaş, 2012).

Tax Law and Budget Improvement (1994): The rising economic crises and the American embargo pushed to state for new measures. The government tried to solve the problem by making various financial reforms in public administration. Most of the state expenditures were military and personnel expenses. Therefore, the state reduced the military budget reserves and personnel recruitment. Besides, a new tax law was introduced to prevent tax evasion (Amaro, 1996).

Establishment of Ministry for Auditing and Control (2001): One of the biggest problems of the Cuban public administration is the corruption and uncontrolled spending. The government decided to establish a ministry to fight with corruption more effectively. The Ministry for Auditing and Control was established in 2001 to prevent corruption and raise moral standards in public administration (UNPAC, 2007).

Constitutional Regulations (2002): Another important reform process of the Cuban public administration was related to the structure of the socialist regime. The Castro administration created a reform package to make the socialist regime untouchable and permanent in 2002. 8,198,237 people supported this process by signing the campaign. The constitutional reform draft was approved by the National Assembly with the extraordinary meeting on June 26, 2002. With this constitutional regulation, the power and permanence of the socialist regime in the country have been increased (Denktaş, 2012).

Socio-economic Regulations: The traces of the transition to the capitalist economy have been seen in Cuba since the beginning of the 2000s. This transition has been supported by many reforms in public administration. Similar developments can be observed not only in economic but also in social sense. Although not satisfactory, many areas have been liberated. We can see these changes in the following Fig. 3.

E-Government: In Cuba, the e-government system has been used for a long time. The system can not be used effectively by citizens due to various reasons. At the beginning of these reasons, there is a limited internet access in the country. On the other hand, we see that Cuba is under the general averages of the regional countries and the world in the use of the e-government. While the country was ranked 103rd in this area in the year of 2005, it ranks 131th in 2016.

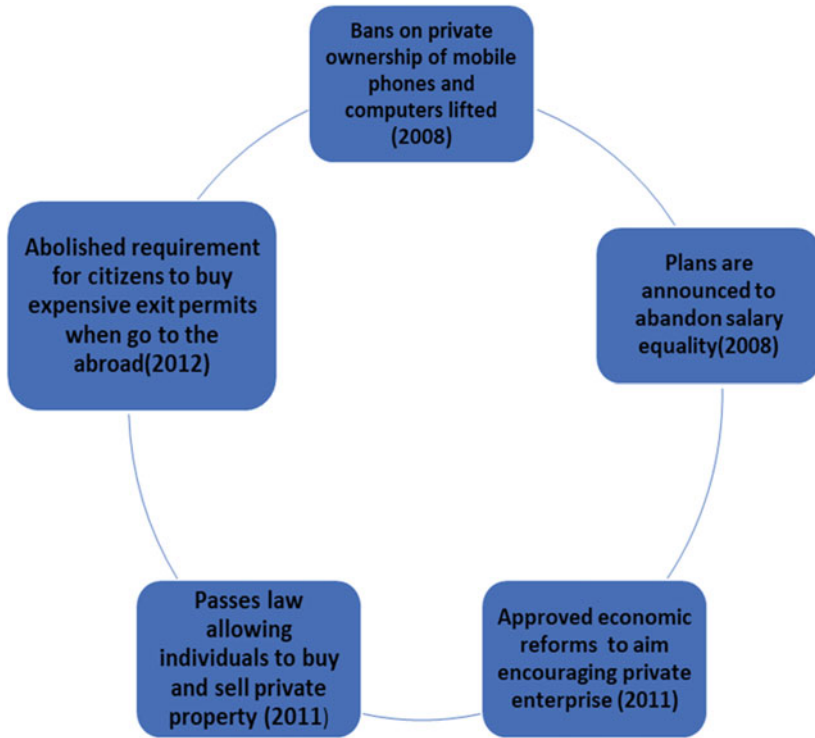


Fig. 3 Changings about Liberalization and Market Economy in Public Administration (Prepared by the Authors)

9 CONCLUSION

The most critical issues that changing Cuban public administration were the 1959 revolution and dissolution of soviets in 1991. As a result of the first event, efficiency and balance were not able to achieve in public administration until the end of the 1980s. In this case, there was also the influence of qualified state officials who fled after the revolution. On the other hand, the decentralization activities that started in the 1980s increased aiming to influence of local governments. Despite this, the requested autonomous local government units could not be successful due to the excessive power of the central government. After 1990s, the paradigm that was effective in public administration was to establish laws and systems that enable to pass on the market economy.

The amendment made in 2002 constituted the exception of this process. This was the last struggle of the Castro regime to keep the socialist system alive. Despite all reforms, the central government continued to maintain its power. They constantly renewed their power through mass organizations on the one hand and television and radio organizations on the other. In addition, the effectiveness and power of the Communist Party played an important role in strengthening its power. Furthermore, there is no separation of power in legislative, executive, and judicial branches. The entire executive, army, and Communist Party are directly in the hands of the president. The president can influence all other units directly or indirectly. Although National Assembly of People's Power appears hierarchically as the strongest unit, it can be said that the Castro family uses this power more effectively. Furthermore, Cuba is a country of mass organizations. Almost all professional associations have unions within their own area. Federations are not effective only in the economic area but also in the social and political area. They are also active in the electoral districts, even nomination of candidates. Finally, the Cuban civil service system is heavily influenced by the socialist system. Although we do not have clear data, it is estimated that 70% of the population are civil servants. However, with the recent reforms implemented after 2000s, the number of civil servants has declined significantly (Table 2).

Table 2 Main features of public administration systems

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>	
Administrative history	Geopolitical situation	Strategic	
	Colonial history	Yes—Spaniards—1492 to 1800's	
	Legacy of bureaucracy	Yes (Spanish-American-SSCB)	
	Centralized bureaucracy	Strong	
	Role of military	Military dominant/manages many economic and bureaucratic institutions	
	Political culture	Very Conservative	
	Administrative culture	Participative	
	Professionalism	Low	
	Politicization of bureaucracy	High	
	Dominant state ideology	Socialist	
Legal structure	Nature of constitution	Written	
	Origin of constitution	the Constitution of 1812	
	Strong constitution	No	
	Constitutional rigidity	Yes	
	Created by	civil initiatives	
	Revised by bureaucracy	civil initiatives	
	Administrative judiciary system	Moderate	
	Central government	State structure	Unitary
		Government structure	Presidential
		Hierarchical structure	Strong
Local extension agencies		Too many (Party Branches)	
Central government		Yes & strong	
Coordinating mechanisms		Moderate	
Transparent financing system		Weak	
Monitoring		Weak	
Independent regulatory agencies		Not Exist	
Local governments		Financial autonomy	Non
	Political autonomy	Weak	
	Council types	Council mayor	
	Mayors	Elected by Delegates	
	Decision making bodies	Exist / Councils	
	Central tutelage/monitoring	Exist & strong	
	Subsidiarity principle	does not exist	

(continued)

Table 2 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Intergovernmental relations	Decentralization type	delegation
	Logic for Division of tasks	undefined
	Tutelage/monitoring	strong
Public personnel system	Communication	moderate
	Civil services	Career based prestigious
	Scope of civil services	70% of the employment
	Recruitment and promotion	Competitive political fair
CSOs/civil society	Nationwide exam	does not exist
	Politicization in general	strong
	Unionization	strong
	Size of Civil Society	4400 NGO's (2007)
	Institutionalization	Moderate
	Partnership with the state	Moderate
	Political pressure/domination	Strong
	Major financial revenues	Membership fees, government supports, donations,
	Supportive national culture	Weak
	Political regime & civil society relations	Weak
Reform philosophy	Civil society	Not very prestigious
	Dominant reform paradigm	Governance reforms
	Policy Transfer	Policy adaptation
	E-government reforms	not completed
	Artificial intelligence (AI) reforms	does not exist
	Influence of international actors	Weak
	New reforms (5 years)	...

Source Adapted and developed from Önder, M., & Zengin Ü. N. (2022). A framework for comparative analysis: Public administration across the globe. In M. Onder, I. N. Nyadera, & M. N. Islam (Eds.), *The Palgrave handbook of comparative public administration: Concepts and cases*. Springer Nature Palgrave Macmillan

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United States of America

Murat Önder and İlyas Balci

I INTRODUCTION

United States is one of the most important economic, political, administrative, and military powers in the world. It is strategically located in a single sub-continent surrounded and naturally protected by the oceans, which made it difficult for competitors to challenge. It has a complex administrative and political system with a population of 325 million and more than 90,000 federal and local government organizations. The fact that it is one of the leading countries in the world as a political, social, and economic power makes it an attractive example to examine the unique public administration structure in more detail. The US is also one of most influential countries in the development of the public administration field with theoretical and practical contributions. It is also particularly interesting due to its federal political and administrative structure, along with the fact that it is the most successful example of the presidential system (Caner & Parlak, 2013). The US has many features that differ from other countries in geographical, cultural, economic, social, religious, and historical aspects (Önder, 2018). Although

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these features make comparisons difficult, it is necessary to analyze and interpret these differences in a meaningful way within their contexts. The fact that American administrative system is highly flexible and dynamic further increases the interest of comparative public administration scholars.

The main purpose of CPA is to enrich the understanding of facts and phenomenon in public administration by comparing the dynamics, functions, and process structures of public administrations of different countries (Heady, 2001). Therefore, this chapter analyzes administrative and governmental system of the US with its administrative history, central local governments, intergovernmental relations, public personnel system, civil society, and recent reforms and developments affecting the public administrative structure.

2 ADMINISTRATIVE HISTORY

United States has one of the longest stable political and administrative structures. The origins of this structure date back to the late fifteenth century of migration spirit. Economic and political turmoil in Europe triggered its people to escape from their countries (especially from England and Ireland) to the American continent. In those years, the American model without rational plans was based on fundamental law, balanced distribution of power, mutual agreement between federal regulations, and classic Christian beliefs. Residents hardly cooperated with each other because of ideological conflicts (Stillman II, 1998: 32–33). The migration movement and culture formed the dynamics of a new administrative, political, and social structure that has survived to this day.

The administrative history of the US roots back to the American colonies that can be divided into three periods as “Royal Colonies,” “Proprietary Colonies,” and “Charter Colonies.” In the Royal Colonies, the governor of the colony was appointed by the King of Great Britain whereas the governor of the proprietary colony was appointed by the owner of the colony. However, in the charter colonies, governors were elected by colonial voters (Önder, 2018: 60–61). In addition to the governors, there was a “High Assembly” making decisions on behalf of the colonies. The members of “High Assembly” were appointed by proposal of the governor and confirmation of the king or colony owner. These assemblies were the legislative’s organs, having the power to make decisions on declaring war and regulating taxes. In essence, the administrative organization of the American colonies was quite similar to the British system because American colonies mostly consisted of British immigrants (Göze, 2011: 502). However, those colonies were not affected by European aristocratic and monarchical structure, and thus, they managed to obtain more freedom to conduct trade and agriculture more freely (Önder, 2018: 62).

One of the turning points of the US’ administrative structure happened in the 1700s with the increase of taxes on American products by King George III. The tea tax increase was the most infamous of them and was levied to

cover the cost of French war. This conflict led the colonies to question the power of the British king who they started to view as a despotic ruler. The Boston tea party is a well-known rebellion story against the British Kingdom with the motto of “no taxation without representation” (Shafritz et al., 2017). On July 4, 1776, the original thirteen colonies published the “Declaration of Independence” written by Thomas Jefferson. They claimed that the king had violated the fundamental rights of life, liberty, and the pursuit of happiness. Thus, under the leadership of the George Washington and Thomas Jefferson, the thirteen colonies gained their independence after a bloody war against Britain that lasted seven years (Goldstone, 2014: 65).

American public administration is based on a pragmatic and dynamic political understanding and functions without strict rules. It is similar to the private sector approach in management, organization, and provision of public services, and also shares roles with the private and the non-profit sector (Snider, 2000). American pragmatism means that the system is dynamic and responsive to problems and can take all practical decisions on their own initiative. It also makes American public administration more adaptable to the new and contemporary management techniques. American public administration is dominant and widely felt. It works efficiently and operates like market mechanisms and is result-oriented like the private sector (Box, 1999; McLaughlin et al., 2005: 166). The main difference of the American bureaucracy from other countries is that they design bureaucracy “weak enough” not to take over political power, but reasonable and “strong enough” to perform management functions (Önder, 2018: 63). The US administrative history can be divided into three periods (Luton, 1999): “the Gentlemen Period,” “Patronage Period / Spoils System,” and lastly, “Meritocracy” that will be covered in the public personnel system.

3 LEGAL FRAMEWORK

After British monarchy experiment, the founders of the US wrote the constitution in 1787 which has the main principles of absolute separation of powers and federalism, which prevents an authoritarian central government and provides a better and faster local administration. The US has one of the oldest written constitutions in the world. Although it has undergone several amendments, it still has traces of its original version. The constitution clarifies the main roles of the federal government and the states that form the union. The federal government is authorized to shape the country’s foreign policy, defense polices and strategies, as well as international commercial treaties (Önder, 2018).

In essence, the US Constitution consists of seven fundamental articles that are further subdivided into different sections (National Archives, 2021). The US Constitution is not particularly detailed. Rather, it is a skeleton constitution as it can be comprehended from the number of articles that the constitution has. It covers the executive, legislative, and judiciary branches in

its first three articles, and the following three comprise the federal state structure in the US. The constitution places a high premium on individual liberty and rights. It is relatively rigid against changes as it needs the approval of both federal and state parliaments.

Legislative authority can only be used by Congress while the president has no authority over the legislature. Although there is no clear distinction between administrative and judicial jurisdictions regarding the judiciary in the US, there is a structure where the public administration is supervised and can have the last word in the relations between the states with its citizens. The court in question is also authorized to deal with private cases. These courts consist of 3 types: Supreme Court, Court of Appeals, and District Courts. It is important to note that the administrative judiciary is not strong in the US (Önder, 2018). The president of the US holds executive authority while they only have veto rights over the drafts made by legislative branch. The cabinet in the US is only responsible to the president (The White House, 2021b).

4 FEDERAL GOVERNMENT

The federalist system significantly shaped American public administration. Following their independence from Great Britain, the 13 colonies would form the United States of America. Federal government branches were established by the US constitution in which their powers were delegated. Separation of powers and checks and balances are the main principles of the constitution. According to this principle, the three major branches of federal government—legislative, executive, and judiciary—are separated from each other but have equal power. The main aim of these principle is to prevent the tyranny of any organ over another. For instance, the president has the right to veto against congress's legislation decisions while the congress has the right to confirm or reject presidential appointments (The White House, 2021b).

Federalism is another crucial principle of the US Constitution that allocates the administrative affairs between federal government and states. There are fifty autonomous states and more than ninety-thousand local units in US The District of Columbia is the capital of the federal government in Washington. The District of Columbia does not belong to any states and its administration is supervised by Congress. The tasks, authorities, and interrelations of the federal government and states are defined in the constitution. Each state has their own constitution, legislative, executive, and judiciary branches. Although federal government has superior hierarchy, it cannot interfere in local state affairs. However, laws and actions of states cannot conflict with the federal constitution. The American federal system, also called pragmatic federalism today (Snider, 2000), has changed in different ways; instead of being bound by strict rules and laws, it focused on problem solving and cooperation, and eventually, a highly complex system of “intergovernmental relations” was formed (Kettl, 2006; Waldo, 2006). Thus, with the need for

a strong and unifying central government, a delicate balance has been established between an autonomous and diversifying local governments and central /federal government (Spicer, 2001).

The federal government is not heavily involved in conducting public affairs, unlike European countries. The public administrative institutions are established by state governments, and the administration of those institutions is based on private sector mentality. Most public services are provided by the private sector while the fundamental duties of public administration are to audit and coordinate those public services. While states carry out the local affairs, federal government conducts and executes national defense and foreign relations.

4.1 *Legislature*

Congress is the legislative branch of the federal government and consists of two chambers—the “Senate” and the “House of Representatives.” The main purpose of congress is to make law. All enactments must pass two chambers by majority votes before presented to the president for confirmation (The White House, 2021a).

The House of Representatives consists of 435 elected members from 50 states in proportion to state population. However, there are 6 non-voting members, including the representatives of D.C., elected for two year terms. The house holds some special powers like initiating the revenue bills, impeaching federal officials including the president and Supreme Court members, and electing the president of the US (POTUS) in case of an electoral tie. The most important power of the House of Representatives is the “budget right,” assigned by the constitution. According to the 1st Article of the constitution, for any code that intends to raise revenues only the house is authorized to prepare the code. This specific power of the house comes from British tradition and the idea that fiscal laws which increase taxes paid by citizens can only be regulated by those who are elected by citizens (Koçak, 2014).

The senate is considered the “Upper Chamber” and is composed of 100 senators, two from each state. Senators must be over thirty years old, US citizens at least for nine years, and a resident of the state that they represent. Senators serve six-year terms and one-third of senate is refreshed by elections every two years. The senate also has specific powers, which include confirmation of presidential appointments, secretaries, Supreme Court members, ambassadors, and so on, declaring war and raising an army, ratification or rejection of international treaties negotiated by the president, and conducting impeachment trial of the president and Supreme Court members by acting as a jury. In contrast to European countries, the president or any branch of the state has no authority to dissolve congress or call a new election (The White House, 2021b).

4.2 *Executive*

The federal government's executive branch mainly consists of the president, vice president, cabinet, and independent agencies. The second article of the constitution gives executive authority to the elected president. Therefore, the president of the US is the head of the executive.

4.2.1 *The President*

The president is elected for four-year terms and cannot be president for more than two terms. Presidential elections in the US are held in three steps (Önder, 2018); in the first step, each party decides on its own candidates for "president" and "vice president." In the following step, each state decides on their delegates who are supposed to elect a president later. The number of delegates for each state is the same as the senators and councilors of the states in question accordingly. In the final step, the delegates decide the POTUS with their votes. The delegates in question are also called as "second electors" as they're elected directly by citizens and are given the authority to select the president.

Despite having multiple political parties, Republicans and Democrats are the main political parties which dominate the presidential elections. To be president, candidates have to earn at least 270 votes, which refers to more than half of the total of senators and the House of Representatives (538: 435 House of Representatives, 100 senators, and Washington has 3 electoral colleges) (Koçak, 2014).

The Executive Authority of POTUS: The president of the U.S. enjoys executive authority as the head of state, head of government, chief of executive, and commander in chief. Therefore, the main powers and responsibilities of the president are appointing Supreme Court justices, secretaries, general chief of staff, and ambassadors with the senate's consent, representing the US in the international arena and negotiating treaties, which still must be ratified by the senate. The president also can send or withdraw troops and give orders to the military as the commander in chief (Unites States Senate, 2021). POTUS can use his executive order authority, which does not require senate ratification, but executive orders the Supreme Court serve as a check and balance to this power. The veto right of the president is one of the most important powers. However, if the enactment that was vetoed by the president passes in both chambers with 2/3rds of the votes in each chambers, the president must sign it. Another legislative authority of the president is to propose law to Congress (Congress, 2021).

Executive-Legislative Relations: Both the Senate and House of Representatives form and share legislative power. The Senate is the higher chamber, while the House of Representatives is considered the lower chamber in the US legislature. Drafts are debated in both chambers and can only be sent to the president for approval after the confirmation of both chambers. Neither the president nor congress have the right to call off the tenure of each other as they are both elected by citizens and can only be called off by citizens through

elections (The White House, 2021a). The president holds two types of political power in the legislative branch. They have the authority to veto the drafts approved by the Congress. Afterward, for the vetoed bill to still become a law, it needs two-thirds of a majority in both the House of Representatives and the Senate. If the condition mentioned is ensured, then the president has no power over the law in question. The second power of the president is to veto the drafts to the next session if there is ten days left until congress ends session. The president can also give some recommendations to congress. POTUS can draw the skeleton of the laws they wish for congress, and then, congress may take that recommendation into account.

Executive-Judiciary Relations: POTUS as a head of the executive branch doesn't have much power over the judiciary due to the principle of separation of powers. While the president appoints top-level officials working in public institutions, the authority that approves the appointments of federal judges and members of the Supreme Court is the Senate rather than the president. Another authority that the president may use related to the judiciary is that he can pardon a person who is convicted of breaking federal law. In addition, the president can also shorten the duration of a sentence.

The Vice President: The most important feature of the vice president is that in the case of death or incapability of the POTUS, the vice president will become the president of the U.S. until the next presidential election. Also, according to the constitution, the vice president is the president of senate. However, this is merely a symbolic power. The senate elects its own president among the majority party members, but it is a tradition not compulsory. In case of a tied vote in the senate, the vice president has right to vote. In contrast to the president, there is no term limit for the vice president.

The Cabinet: Cabinet was established by the constitution and according to the second article, the Cabinet is an advisory organ. The cabinet is composed of the vice president and fifteen secretaries. Secretaries advise the POTUS on related topics of their responsibilities.

Secretaries/Departments: Unlike other parliament systems, secretaries (ministers) are appointed by the president. Departments are established by congress and they are effectively the second executive branch after the president. Their fundamental duty is advising the president on topics under the department's purview. Final decisions are always made by the president. Secretaries are also responsible for the administration and enforcement of laws, delivering governmental services and representing US, and negotiating with other countries about related subjects of their secretary. In this perspective, "Secretary of State" and "Secretary of Defense" are regarded as the most influential secretaries of the cabinet. The Secretary of State carries out the foreign affairs. That's why it's the most prestigious and influential secretary of the federal government (Mulcahy, 1986: 183–199; US Department of State, 2020).

Organization of Departments: All departments are composed of a secretary, undersecretary, deputy undersecretaries, and bureaus. The appointment

of secretaries, undersecretary, and deputy undersecretary are by political appointment, but the appointment of secretary must be confirmed by the senate after the president nominates them. The appointment of bureaus and lower levels is based on meritocracy. Furthermore, bureaus are divided into the divisions and divisions are divided into sections (Fig. 1).

Independent and Regulatory Agencies: Independent agencies established by the president and act independent from cabinet. However, in some cases, independent agencies can carry out their services depending on the related department. The main purposes of the independent agencies are regulating relations among departments, states, and other institutions, conducting their special duties and ombudsman affairs. In the US, there are more than 200 independent executive agencies which are separated from departments. Some of the most famous independent agencies are the “Central Intelligence Agency (CIA),” “the National Aeronautics and Space Administration (NASA),” and “the Social Security Administration” (Strauss, 1984: 592). Regulatory agencies are very influential institutions in the US which are empowered by congress. They mainly make and enforce rules to regulate governing services and the economy. Some of the most important regulatory agencies are: “Securities and Exchange Commissions (SEC),” “Nuclear Regulatory Commission (NRC),” and the “Federal Trade Commission (FTC).” These regulatory agencies make and enforce the rules which affect almost all producers and consumers. However, the most independent and influential agency is “the National Central Bank” which is known as the “FED.” It is responsible for

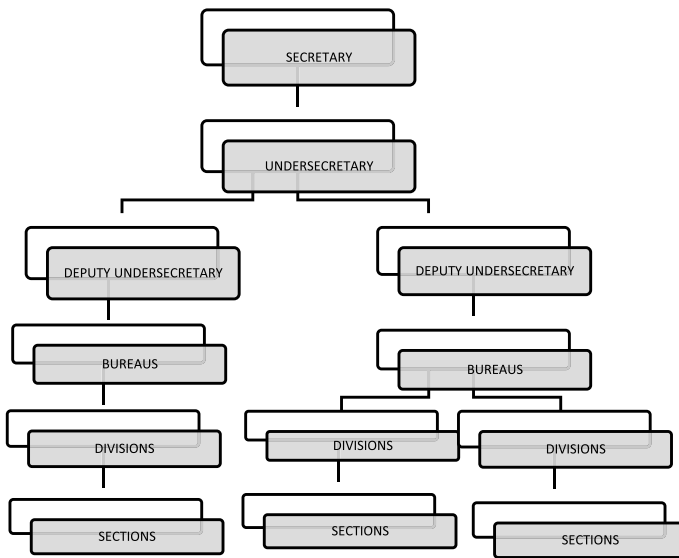


Fig. 1 Basic Organization of U.S. Departments (Source Authors compilation)

establishing monetary policy of government, setting interest rates and determining the amount of supply money (Board of Governors of The Federal Reserve System, 2020). The Fed's decisions can affect inflation, international trade, and even other countries' economies and that's why the president of the fed is seen as the second powerful person in the US after the POTUS.

5 STATES AND LOCAL GOVERNMENTS

The local government system of the US was affected by European countries, especially the United Kingdom. However, over time the US developed a distinctive local government system that fit its economic, social, and political structure. The American colonies were organized separately from each other before the independence and thus were reluctant to give all authority to a strong central government. Therefore, to prevent emergence of an authoritarian central government and provide efficient and fast local public services, they accepted the federal system which gives sovereignty and autonomy to states.

The founder presidents of the US, specifically, J. Madison and T. Jefferson, played a crucial role in shaping local government structure in the US Jefferson supported decentralization whereas Madison defended the necessity of strong central government. As a result, US government structure was shaped by the balance of these notions and achieved both a strong central government and decentralization (Library of Congress, 2020). Support for state and community rights stems from the Madisonian concern to prevent domination of the nation by a single powerful dictator. There is a strong tendency to hand power to the smallest government unit that is capable of efficiently undertaking a public function. "French political writer Alexis Tocqueville observed that the basis of liberty in the U.S. lay in the independence and participative democracy at the heart of local government" (Chandler, 2000: 209).

5.1 *State Governments*

Government structure of states is mostly similar to the federal government structure. With the exception of Nebraska, all states' parliaments are composed of two chambers—the Senate and the House of Representatives—but in contrast to federal congress, parliaments of states hold some executive powers, like determining the scope of budget and selecting some high officials. In some states, people have the right to launch a legislative initiative and referendum to participate in the administration.

State governors are the head of the executive branch of states and are elected for four-year terms, but it can be different in some states. States have the right to regulate the term limit, but it cannot be more than four years. In most states, governors have powers to prepare budgets, propose legislation, and veto. Also, governors are responsible for developing major policy of states and supervising the state policy that is conducted in practice. In some

states, such as Colorado, most crucial executive officials are directly elected rather than appointed by the governor. Although there are different administrative officials among different state governments, generally the government officials consist of a treasurer, sheriff, attorney general, and judges. The size and complexity of bureaucracy vary among the states according to population.

According to the 10th Amendment of the Constitution, local government units are established and authorized by state government. States are free to regulate local government systems without any restriction. Therefore, states have absolute sovereignty over the local governments. According to John Dillon, the Chief Justice of Iowa, states have the right to establish local government units and change their structures and functions (Barron, 1999: 496). In accordance with the “Dillon Rule,” states have limitless check and balance authority against local government units.

There are variety of local government units among the states. That is why, there is not any standard of local government structure that is seen across the whole country. However, in general, local government units include county, municipality, township, and special district governments.

5.2 *County*

County is the biggest and most basic local government unit in most states. Counties are the primary governing units of states, except Connecticut and Rhode Island—in these states, counties do not carry out governing functions. Some of the important tasks of counties are: recordkeeping—births, deaths, and so on—law enforcement, vehicle license registration, zoning, construction and maintenance of roads, administration of elections, and fire services (Önder, 2018: 80–82). Counties are mostly governed by an elected council or commissions. In some states, council acts as both the legislative and executive organ. Council members, in general, serve four-year terms. Beside the county council or commission members, in most states, sheriff, judge, prosecutor, and other officials are also elected by popular vote. In addition to those officials, some county councils appoint or hire a professional manager to manage general activities of a county.

The states in the US have county councils which consist of at least two bodies which are decision-making and executive bodies. They are also named as “committee,” “commission,” or “board” that may vary in accordance with the state they are in. The number of members that each council has varies. However, they have less than ten persons on average. The decision-making body of each council is authorized to take decisions related to financial and regulatory issues which are relevant to their working area that include collecting taxes for the county, distribution of resources for public affairs, etc. (Şahin, 1999: 122).

5.3 *Municipalities/City Governments*

Municipalities are the most autonomous and functional local units of states. Even though they do not serve vast geographical areas as counties do, they conduct more important public services. Therefore, municipalities have more authorities and autonomy than other units (Tausanovitch & Warshaw, 2014: 605). Municipalities carry out and provide important services in the cities. Mainly, these services include providing public safety, maintenance of roads, street, parks and recreation, trash removal, fire and rescue services, public transportation, and zoning and code enforcement. Furthermore, larger cities may provide public hospitals and social welfare programs, assisted housing, and manage social welfare programs. In many cities, water, electricity, natural gas, and telecommunication services are provided by municipalities.

Municipalities are governed by popular elected officials that consist of the city mayor and city council. These officials are responsible for making decisions and setting city policies. The mayor is the head of city government even though they might not a member of the council. Mayors supervise the city's daily affairs and administrative functions. Some cities adopted city manager forms of government where the city council hires a professional manager to run the operations of the city. A city manager is the chief executive administrative officer of the city and, although not elected, reports directly to the elected city council (Morgan & Watson, 1992: 441).

There are five main forms of municipal government: Mayor-Council Form, Council Manager Form, Commission Form, Town Meeting Form, and Representative Town Meeting Form.

5.4 *Townships*

Townships or towns are the traditional local government units of the US and they trace back to the colonial era. Towns are the primary local government units of New England state; thus, they carry out some important affairs, such as administration of schools. However, towns generally provide health and police service, supply water, and gather trash. In some states, towns are also authorized to collect taxes (Gargan, 1996: 293).

5.5 *Special District Governments*

Special district governments are established to fulfill a particular service in a specific region. The establishment of special districts relies on state laws. These governments run their administration independently from other local government units. Some of the important services of special districts are water and natural resource conservation, fire protection, water supply, emergency services, and transportation (Carr, 2006: 482).

5.6 Fiscal Structure of Local Governments

Local government units need financial resources to provide services. Thus, local governments have three kinds of revenue sources in the US: taxes, inter-governmental transfers, and other revenue resources. Local government units can levy taxes within the limitations of state law. The major tax sources of local governments are property, sales, and income taxes. Secondly, intergovernmental transfers refer to transferring funds from one level local unit to another, which can be for special purposes like education service or general federal activities. Transfers are the primary and largest revenue source of local governments (Fig. 2).

Other revenue sources include charges, fees, debts, and income from their own economic companies. These sources support municipalities to extend their services, gain stability for their economic structure, and be more independent from their states.

6 INTERGOVERNMENTAL RELATIONS

The structure of intergovernmental relations in the US is defined by its federal system. There are 50 states in the US, each of which are independent from each other and have their own constitution. However, the central power is also concentrated in Washington DC. The American Constitution addresses which power is going to be used by which part of government. Indeed, “The men who created the American Constitution founded the first modern form of federalism...even so, the framers considered federalism as more than a political expedient” (Iwuoha, 2013: 1).

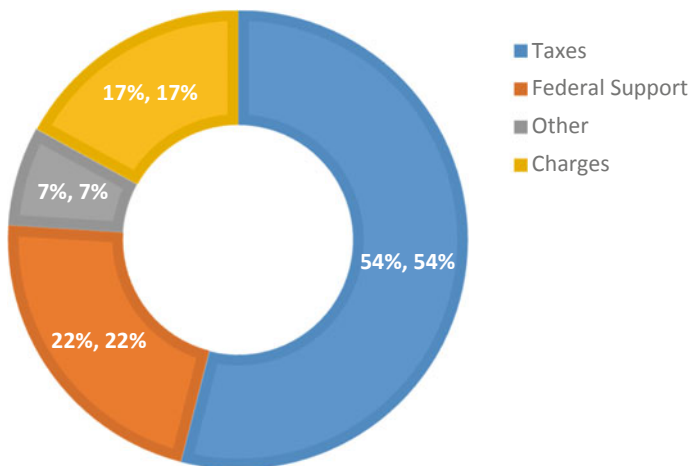


Fig. 2 Source of state and local governments general revenue (2018) (Source United States Census Bureau [2020]. *State and local government finances summary report*)

Relations between federal government and the states in the US have evolved historically. Political interests, administrative efficiency, and the necessity to develop certain policies influenced the U.S. federal system. “The overriding value attached to the concept of human rights, security, and liberty, and need to foster a coherent and harmonized definition of these rights for greater protection of the citizenry, gives vent for the consistent changing pattern of American federalism” (Iwuoha, 2013: 9). Three distinctive classifications have been observed in the US federal experience. They are dual federalism, cooperative federalism, and the new federalism (Rosenbloom et al., 2015).

Dual Federalism: It was used between 1787 and 1932 in the US. In this model, neither level is dominant. Sometimes state governments and sometimes federal government are more dominant. Powers were distributed among sovereign powers. Exclusive authority and responsibilities were given to states in areas like education, public safety, crime and punishments, etc., while federal government was in charge of foreign affairs (Kincaid, 2017: 1061).

Cooperative Federalism: It was used between 1933 and 1964. In this model, the USA was nation-centered and federal coordination was important in the US. The Great Depression of the 1930s brought the cooperative federalist system into America. As a result, the US has become more state-centered (Weiser, 2001: 665).

New Federalism: It was used in the US public administration between 1972 and 1988. Some federal government powers were given to states, which have shifted federal government to a cooperative federalism era. President Nixon introduced “revenue sharing” to the American System in the New Federalism Era (Walker, 1996: 271).

Powers and Responsibility Sharing System: Intergovernmental powers have been shared among the federal and state governments in three-sided mechanism. These powers are exclusive powers, concurrent powers, and residual powers. According to the constitution, federal governments are authorized to use the exclusive power while concurrent powers are reserved to the federal and state level. In addition, state governments have limited resident powers as they’re supposed to allocate part of their roles and responsibilities to the local governments (Önder, 2018).

Exclusive powers are divided into three categories, which are enumerated, implied, and inherent powers. Enumerated powers are clearly stated in the American Constitution. The best examples of enumerated powers include: laying and collecting taxes, duties, imposts and excises, paying debts, and providing common defense and general welfare of US (Natelson, 2003: 470). The powers of the POTUS like acting as the Commander in Chief of armed forces and appointing federal judges, ambassadors, and other important official leaders with the advice and consent of the Senate into Enumerated Powers can be considered exclusive powers. Secondly, implied powers are powers that are not openly written in the constitution. They are indirectly stated or implied from the powers that are expressly delegated. For example, the US Constitution states that the “The Congress shall have power to make all laws

which shall be necessary and proper to carry out into execution the foregoing powers” (National Archives, 2021). Thirdly, inherent powers can be exercised by national government simply because government exists—for example, protecting itself against rebellion or invasion.

In addition to exclusive powers, some powers are reserved to the states by the 10th Amendment provision. This provision has powers that are not delegated to the US central powers. They are reserved to the states or to the people, respectively—for example, education, marriage and divorce, regulation of motor vehicles, regulation of banking, business, etc. (Table 1).

Imposing tax, jurisdiction of crimes, and regulating the court system are fundamental parts of concurrent powers. These are used and executed by federal and state governments. The governments in question can exert taxes on citizens independently. The same method is also valid for some other issues. For example, an act may be considered as a crime in one state and not another.

As an organ of the federal government, the Supreme Court of the United States of America decides which acts of the federal and state governments are within their respective powers. So there is a competition between center and the states. The Supreme Court, which is a part of the federal government, has superiority over states. In addition, states have certain obligations to the federal

Table 1 Distribution of tasks between federal government and the states

<i>Federal government</i>	<i>Federal and state governments</i>	<i>State governments</i>
Printing money	Collecting tax	Forming local governments
Conducting foreign relations	Borrowing	Regulating business inside the state
Regulating trade between countries and states	Establishing courts	Executing elections
Retaining the army and navy	Making and enforcing laws	Confirming the constitutional amendments by the federal governments
Declaring war	Giving relevant permissions to banks and firms	Taking precautions for the public health, peace, and security
Establishing courts under the Supreme Court	Spending for general welfare	Exercising powers that the constitution does not give to federal government or prohibit states
Making laws to implement the constitution	Regulating transports and building highways	Giving licenses
Establishing a postal service	Acquiring property for public purposes	Forming state constitution

Source Fairfax. (2020). *Explaining federal, state, and local governments*

government within the monitoring of the Supreme Court which holds jurisdiction powers. State and local officials carry out national laws and regulations on day-to-day basis.

7 PUBLIC PERSONNEL SYSTEM

As the largest economy in the world, the US has a small-scale public sector compared with some other European countries. The proportion of public personnel in the US extended rapidly after the American Civil War New Deal program that was created and exercised by President Roosevelt. This led to the rise in quantity of public personnel in the US (Önder, 2018). President Reagan on the other hand applied a kind of minimal / liberal state policy in 1980s, which led to a decrease in the number of public employees in US public administration history (Table 2).

The number of public personnel in the US is not high as the U.S. has approximately 23 million full-time and part-time public personnel. This constitutes nearly 6.5% of the population and is considered low in terms of bureaucratization. In addition, the quantity of personnel who are working for the federal government has been going down while the quantity of public personnel who are working for state and local governments has been rising recently.

Most of the senior public employees who are working in federal government are appointed from the center instead of through elections. The proportion of employees who work in the legislative and judicial organs are less than the executive. Most of the employees who are working in the executive organ are working in ministries and 1/3 of the others work in independent government agencies. Almost half of the ministry's personnel work in Department of Defense. Approximately 46% of federal employees are women, and in general, they are placed in medium to low positions. 97.7% of the federal

Table 2 Government civilian employment, 1940–2012 (employees in millions)

<i>Year</i>	<i>Total</i>	<i>Federal</i>	<i>State</i>	<i>Local</i>
1950	6.4	2.1	1.1	3.2
1960	8.8	2.4	1.5	4.9
1970	13.0	2.9	2.8	7.4
1980	16.2	2.9	3.8	9.6
1990	18.4	3.1	4.5	10.8
2000	20.9	2.9	4.9	13.1
2005	21.7	2.7	5.1	13.9
2012	21.2	2.8	4.7	13.7
2019 ^a	22.6	2.8	5.5	14.3

^aUS Bureau of Labor Statistics (2019)

Source Llorens et al. (2017: 61) and US Census Data (2019)

civilian employees work for the executive compared to 1.2% in the judiciary and 1.0% in the legislative (OPM, 2013).

7.1 *Historical Evolution of Civil Service System*

US civil services as an eclectic system need to be analyzed in the US' specific cultural and political context (Jreisat, 2012) to better understand its impacts and implications in the current system. Historically, the US public personnel systems developed in evolutionary phases that seem separate, but in practice they overlap (Llorens et al., 2017). These periods include the guardianship, patronage, professionalism, mixed approaches, and security concerns periods.

In the era of privilege or guardianship period (1789–1829), the small group of upper-class property owners who had won independence and established the national government held most public jobs (Llorens et al., 2017: 35). The appointments were based on the personal characteristics of the civil servant with consulting ability, honesty, and trustworthy. Also, other founding fathers like Washington, Jefferson, Madison, and Adams used this approach while choosing personnel to the public sector. The people with appropriate characters were generally considered to have high prestige and that's why they are referred to as "gentlemen" (Şen, 1995: 79). Washington's criterion of character coherence and political loyalty policy was maintained by President John Adams. Under him, political loyalty reached its peak in his era. President Jefferson on the other hand, who is considered to be the founder of the US Constitution, didn't pursue what former presidents did in terms of the gentlemen approach. He tried to keep federal public personnel away from the elections. What Jefferson brought to US public administration was "neutrality" and limits to the tenure of public personnel. In order to realize it, Jefferson made a draft (later to be law) stating that the limit for a public personnel's tenure must be no more than five years term (Türkan, 2000). He attempted to eliminate lifelong public position appointments, and public personnel positions were designed to be more flexible.

An era of patronage or spoils system emerged (1829–1882) after this generation, during which public jobs were awarded according to political loyalty or party affiliation (Llorens et al., 2017: 35). This era is also referred to as "looting" or "favoritism" since the president used to appoint public servants who are near or support him. If the president is not dominant, civil servants are selected by the senators (Hickman & Lee, 2001: 2–3). Balanced numbers from each social group were appointed in an effort to restrict division in the country and discourage disobedience. Being a party member was the best way to get appointed as a public servant in this time even for local authorities. The partisan employment and appointments between 1829 and 1883 frequently betrayed the public trust and demonstrated incompetent administration (Riggs, 1994: 68). In 1883, the Pendleton Act was accepted by the Congress and Civil Service Commission was established to prevent these partisan appointments after President J. A. Garfield was killed by an

unemployed citizen in 1881 (Ömürgönülşen, 2009). With these reforms, president appointments were restricted to 10% and an open exam system was used to choose public personnel. Today, still we can see some effects of this period. After presidency tenure, 200.000 employees leave their public positions (Türker, 2003).

The size and complexity of public services in time led to an era of professionalism (1883–1932) that defines the public personnel system as a neutral administrative function to emphasize modernization through efficiency and democratization by selecting public employees based on merit (Llorens et al., 2017). With influence from the scientific management movement, efficiency seeking in the US public administration for civil service reforms continued in this period too. Structure of “Position classification” which is identified with the American public personnel regime was constructed in this period (Ömürgönülşen, 2009). Public works have seen as a profession after this period, and public servant entrance exam has seen the evidence of the merit system which brings lifelong profession for employees in public sector.

The unexpected problems of a global depression and World War II led to the emergence of a hybrid performance model (1933–1964) that combined the political leadership of patronage systems and the merit principles of civil service systems (Llorens et al., 2017). With the effect of the Great Depression in 1932, scale of the state in social and economic life was increased, which resulted in increase in public employment.

Next, social disturbances (1965–1980) signified the emergence of the people era, in which collective bargaining emerged to represent collective employee rights and affirmative action emerged to advocate for social equity (Llorens et al., 2017). The main concerns of this period was feasibility of recruitment exams, credibility development, and preventing racial discrimination while hiring public employees. With the Civil Service Reform Act issued in 1978 thanks to President Carter, long-term changes emerged in US public service system (Ömürgönülşen, 2009). Effective works in the public offices were provided after the establishment of “the Merit System Projection Board” and “Office of Personnel Management” which brought technical assistance to the public personal system. In addition to those, the Equal Employment Opportunity Commission was established for the American public personnel system (Önder, 2018). It enabled the prevention of discrimination of races which also has the power to punish those responsible for discrimination.

General dissatisfaction with government led to privatization and other business-based HRM solutions in the 1980s, followed by partnerships with NGOs and other contractors as third-party tools for public service delivery in the new millennium (Llorens et al., 2017). Therefore, the supporters of each system attempt to minimize the influence of others by using certain events to increase pressure for change. For example, assassination of Garfield, the September 11 attacks, and the Covid-19 pandemic all dramatically increased the importance of safety and health for the public. When these special values

or concern emerge, they distort, limit, or suppress the effectiveness of human resource management values.

7.2 *Current Situation of Public Personnel Regime*

High-level appointments and normal public officers have different statuses in the US public system today. Political appointments, merit systems, and wage systems are still valid in today's public personal system in the US (Gitelson et al., 1991). However, the numbers of the political appointments are decreasing day by day.

Current human resource practices in US public sectors provide open access and competition even though they formed and out of a reaction top political excesses of the past. The current merit system includes features of adequate publicity, opportunity to apply, realistic standards, absence of discrimination, ranking on the base of ability, and knowledge of results (Hickman & Lee, 2001: 4).

Newly elected presidents usually want to form their own bureaucratic executive team. However, most of the appointed officials are not member of the same party as the president, because these officers are generally offered to presidents from senators or interest groups. So, being the chief executive does not give full power to the president while appointing officers. Also appointments must happen with the advice and consent of the Senate. Also, most of the public personnel have the protection of assurance. Also, competence of the temporary debarment of the president is restricted. President can only hire or fire top managers who are hired by the president. However, half-judicial officers and half-legislative officers have the protection of Congress. On the other hand, whether appointed from the Senate or not, all appointed public personnel are owed their responsibility to the president.

Unlike political appointment, merit system fills most of the public cadres. The American meritocratic system has some differences than continental Europe's. Some public personnel can advance their position to the top ranks if they are capable of it. It is also called a closed career system or rank classification. Comprehensive and meritocratic exam systems are used which includes candidates from all over the country and successful candidates take public personal status. These exams measure technical qualifications and specialized knowledge. Any expert of any group can be a candidate for administrative position in their expertise. If a candidate is not successful, they can't continue this job until retirement. It is also called an open career system which includes intense work and position classification.

Most of the public personnel on the federal level in the US are included in the meritocratic system. Until 1982, there were general exams named the professional, administrative, and clerical examination. However, the idea of discrimination against minorities and risks and impossibility of selecting best candidate in one exam for every public office started to make its exam separately.

Classification of federal employees is divided into 15 hierarchical categories which start from GS-15 to GS-1. General schedule places every public servant into one category, and their salary is determined according to this schedule. In addition to 15 categories, there is also Senior Executive Service which is named as GS-16, GS-17, and GS18. There are also 2 special groups which are named as Scientific/Professional System and the Senior Level (Van Riper, 2007: 36). The US is the first country that creates another class, senior civil service to hire talented public personnel through the political appointments (Ömürgönülşen, 2009). Senior Executive Service rewards successful administrators and expels low performance administrators. However, competing with the private sector and restricting the number of senior civil servants to 8 thousands are two significant challenging factors in senior civil service positions.

Political appointments for higher positions in the American public personnel system are very common but one should think in the context of general administrative culture in the country where employment, promotion, and appointments are very competitive. These top position appointments are neither purely ideological nor depend on favoritism. Administrative culture assures that administrative capability, talents, skills, performance, etc., are significant criteria in selections. There is flexibility to hire CEOs from the private sector for top positions and professionalism in city manager positions is a very famous example of this (Önder & Köylü, 2018). Top management positions require business acumen, leadership spirit, communication, and moving that is focused on a result-oriented mindset which are the qualifications of those administrators. Required qualifications of the mission are more important than qualification of the person who will work in this position when choosing someone a position in the US public system. This business mentality should be understood in the context of social and business culture in American society—the cradle of the capitalism. 90% of appointments to the Senior Executive Service positions are career-based appointments. Non-career appointments are possible in just GS16, GS17, and GS18. When there is a non-career appointment, a permit of Personnel Management Office and White House approval is necessary. Also, it is not necessary to attend examination if an authorized officer decides the candidate is sufficient for the position.

“One of the main establishment purposes of the Senior Executive Service is to take responsibility of top-level officers based on their personal and organizational performances to increase the total performance of the federal system” (Ömürgönülşen, 2009). Public organizations determine whether SES personnel make good performance or not every three years. They also conduct recertifications of these personnel. However, rules were changed in 2002 and performance rating system competence was given to public organizations to balance performance results and wage rates.

Federal governments have continued to improve the civil service system since the passage of the Civil Service Act of 1978, and government performance act / reinventing government reforms also had notable impacts. However, the states’ adoption of a broad set of reinventions of personnel

reforms had significant variation among states in their willingness to implement major changes to their personnel systems (Kellough & Selden, 2003: 172). A number of state and local governments have abolished their civil service systems and moved to a human resource which is more sensitive to market, teamwork, and stakeholders rather than centralized public approaches (Hickman & Lee, 2001: 6). The Carter administration achieved significant civil service reform in 1978, and the Clinton administration and its National Performance Review advocated for and implemented additional reforms in the 1990s. After the end of the reinvention era, Bush, after September 11, implemented major personnel management changes to improve organizational performance and productivity by streamlining personnel procedures and decentralization (Brewer & Kellough, 2016: 172). Brewer and Kellough (2016: 184) summarize civil service reforms with a tendency to target the bureaucracy as a scapegoat as usual. Reforms generally require the implementation of pay-for-performance systems, and they aim to weaken or dismantle traditional civil service systems by deregulating personnel policy and eliminating or reducing merit system protections afforded to employees. At the federal level, the OPM has eliminated all of the Federal Personnel Manual, providing agencies with much more discretion and has delegated recruiting and examining to the departments and agencies, simplified the present classification system, and permitted agencies to create their own performance rating and reward systems (Van Riper, 2007: 39). It seems that ideological and political motives were at play and dominated technical concerns in civil service reforms in the Bush (Kellough et al., 2010: 417) Obama, and Trump periods.

The US civil service system has derived from a complicated set of foreign and indigenous influences. It was initially formed by an amalgam of constitutional interpretation partisan political practice, early British civil service impacts, and a cultural legacy of an open mobile and immigrant society (Van Riper, 2007: 24). The current US system of public personnel administration has ended up unique in the world of governance with a mixture of influences from academia, the private sector, the military, and politicians.

7.3 *Unionization of the Public Personnel System*

Public personnel who were late compared to private sector workers in modern sense first have started to organize in the nineteenth century (Önder, 2014, 2018). In an American-specific context, the first union for public personnel was the National Teacher's Association founded in 1857. After the 1880s, unionization of public personnel gained momentum and the Lloyd-La Follette Act gave public personnel the right to unionize. The union right of public personnel reached its peak point from the 1950s to the 1970s (Ömürgönülşen, 2009). Polices, firefighters, and post-service personnel had mostly unionized in these times. The armed forces are an exception as they do not have the right to unionize. When there is a dispute between sides, the federal government serves the role as the mediator. In addition, the right to strike was given to

Table 3 Non-profit Sector in US (NGOs)

<i>Number of Non-Profit Organizations (2013)</i>	<i>1.41 million</i>
Ratio of NGOs Income to GDP (2013)	% 5.4
Total Employment Rate of NGOs 2010	% 9.2
Total Private Giving (2014)	\$358.38 billion
Employee Rate in NGOs (Volunteer Employees)	% 3.7
Employee Rate in NGOs (Paid Employees)	% 7.1
Average Annual Adult Volunteer Hours (2014)	139 hours
Total Revenue of NGOs (2014)	\$2.26 trillion
Annual Household Donation Amount	1.075 \$

Source Urban Institute (2015). The Non-profit Sector in Brief 2015: Public Charities, Giving, and Volunteering

public personnel in just 13 states which are also restricted with some rules and positions. After 1980, public personnel unions lost power, like other countries in the world.

8 CIVIL SOCIETY/NGOs

The non-profit sector (NGOs), also known as the civil society, voluntary sector, third sector, or NGOs, has a significant role in economic and social activities in the US (Önder, 2010b). The US is the leading country in terms of the size of NGOs across nations (Önder, 2006). The number of non-profit organizations in the US is 1.41 million as of 2013. Again, as of 2013, NGOs have contributed 5.4% to the GDP and a rate of 9.2% in total employment. The rate of volunteer / paid employees in NGOs is 3.7% and 7%, respectively (Urban Inst, 2015). An adult's average voluntary working time in America is 139 h per year. Again, as of 2014, the total income of NGOs was 2.26 trillion dollars. Donations to the non-profit sector per household in the United States are 1,075 dollars (Table 3).

The US government system develops policies through citizen participation and negotiation, open to different views and interests. Governments and non-governmental organizations seeking to influence governments have grown over time. Media, non-governmental organizations, public policy research organizations, think tanks, unions, and political parties carry out public or quasi-public services and activities in a variety of areas (US Department of State, 2017).

9 ADMINISTRATIVE REFORMS

From the end of the last century up until the twenty-first century, all over the world many reforms have emerged in the field of public administration. The

US as a relatively new country has more than 100 years' reform history that is affecting public administration. We can see American pragmatism in these reform movements. Continued in the last quarter century under the name of reinventing government in the US, the effects of the reforms and innovations on public administration need to be further clarified. The foundations of the reform movement were found in 1936–1937 by the Brownlow Committee's "Executive Structuring" (Stillman, 1998: 138). Badly designed and ineffective organizational structure in public administration was also significant topic then. This is often on the agenda among the legislature and the executive. The Brownlow Committee Report during this period was the first official evaluation of public administration in terms of the business and management mentality (Shafritz et al., 2017). In the discussions of that period, similar to the 1990s, it was often discussed whether the president or Congress should have more power. The Hoover Commission (II) in 1947–1949, after World War II, aimed to reduce the number of public organizations. However, this commission also focused on increasing the power of the president to be more effective in the executive and then proposed larger public organizations. After 4 years since realizing the mistake, the Hoover Commission (II) made proposals to reduce public organizations, but very few of them have been realized (Shafritz et al., 2017).

One of the reforms that most affected the administrative structure of the US is the New Public Management Approach. First appearing in the 1970s, the new understanding of public administration started to spread in the 1980s and is widely accepted and applied. This approach is known by different names in the world and is known as "Reinventing Government" in the US (Önder, 2012). This approach enables active participation in management and result-oriented management and brings performance measurement and managerial techniques developed in the private sector (Kutlu, 2012: 73–75). It was inspired by Gaebler and Osborne's book "Reinventing Government" and constitutes the last page of progressive administrative reform efforts (Önder, 2010a). It also goes back to Richard Childs' city management movement and local research bureaus in the innovative / progressive era (Luton, 1999; Stillman, 1998: 121). The report (National Performance Review) was formed around themes of Gaebler and Osborne's reinventing government. As an eclectic approach, the reinventing government movement includes ideas of new public management, political economy, public choice, and strategic management, rather than emphasizing the downsizing of the state. Thus, it promotes leadership, entrepreneurship, and competitiveness and efficiency similar to the private sector (Önder, 2012).

At the beginning of the new millennium, the governance approach emerged as the dominant supreme concept and paradigm in the public sector. Although efficient work is accepted, new public management has lost its main focus. Participation and collaborative governance came to the fore and became the main focus (Ayhan & Önder, 2017). New Public Reforms aimed for

the improvement of budget processes, decentralization in public administration, the reviewing general monitoring, simplification of legislation, and the empowerment of state and local authority organs. When we look at the numbers of federal, state, and local level public servants, we can see that center gives some of its powers and responsibilities to local units. The number of federal public personnel is decreasing day by day while there is little increase in local units, which are states and local government. Decentralization brings further democratization as well as better and faster services to citizens.

Business and entrepreneurship culture are seen in all aspects of American society, including public administration. Downsizing to the state scale can be seen as the main feature of US public administration, which learns a lot from the private sector. Some of the best examples of American culture are planning, programming, and budgeting systems of the 1960s, zero-base budgeting and organizational development of the 1970s, downsizing of the state scale of the 1980s, and total quality management, benchmarking, and re-engineering techniques.

In the US, Democrats and Republicans have agreed in some respects although they still have their differences. Barack Obama, the former president of the US, was a Democrat who tried to make some reforms in public organizations. Unlike the typical political culture of the US, Obama's reform attempts were based on social democratic policies that empowered the role of the state in important services like health care. The Obama administration has created more than 10 new large public organizations in areas such as health, innovation, consumer protection, food and pharmaceutical management, auto workers, public health, and cyber security (Shafritz et al., 2017: 115). However, after Republican Donald Trump was elected, the US has reduced social democratic policies but with his new chaotic unplanned manner. The Covid-19 pandemic made these policies more impractical, and at the end, Trump lost and the Democrat Biden came in and immediately ended many of Trump's policies.

E-Government: In the era of high communication in the 2000s, interactions between the states and citizens came down all the way to the ordinary citizen. E-government as a new trend connects particular individuals to the federal. The private sector is using communication and information systems effectively and efficiently (May & Chadwick, 2003: 272). Federal government and states both realized the benefits of e-government reforms and adopted these technological developments.

Artificial Intelligence: The US is a leading country with its investments in these industries, which comprise the world's largest technology businesses—with a combined market capitalization of over \$3 trillion. All of them happen to be US companies (e.g., Apple, Amazon, Facebook, Microsoft, and Alphabet) (Saygılı, 2020: 19). The US has created significant developments and applications of artificial intelligence public policies compared to other countries. They prepared their own national strategic AI plans and established a roadmap for leading AI in the world. The important strategic

documents of the USA are “Preparing for the Future of Artificial Intelligence,” “The National Artificial Intelligence Research and Development Strategic Plan,” “Artificial Intelligence, Automation, and the Economy,” and the “2019 Version of The National Artificial Intelligence Research and Development Strategic Plan” (Saygılı, 2020: 152).

10 CONCLUSION

We studied US public administration in terms of its administrative history, public personnel system, organizational structure of central and local governments, intergovernmental relations, civil society, and finally, recent developments and reforms. The American country governance structure served as a model county for many academic studies and had a great impact on the development of the CPA sub-discipline. Comparative public administration emerged with the mission of modernizing and developing underdeveloped countries and has significantly contributed to the discipline of public administration with its “development administration” content (Islam et al., 2021; Nyadera & Islam, 2020). It developed rapidly after World War II.

The foundations of the administrative structure of the US were laid during the colonial period. Historically, many different factors have played a role in establishing the administrative structure of the US. The most important of these factors are the governance understanding of the United Kingdom, decentralization, the US Presidential systems, and presidents. The founders of the US designed a central government that binds all federated and autonomous states, which have permission to make their own constitutions to ensure unity and integrity in the country. The federal government makes joint decisions for the country at the national and international level more quickly and ensures the coordination of the states. The US Constitution forms the basis of the US government and public administration system. The Constitution, adopted in 1788, determines the powers and limits of its three different organs (legislative, executive, and judicial). Under the system of separation and balance of powers, state power is divided between three organs, and each organ has some authority over the other organs, ensuring that one organ does not have too much power. In addition to the US President, which is governed by the presidential system, there is also a vice president and cabinet. However, unlike parliamentary systems, the president’s cabinet is an advisory board.

Federated states have their own constitutions and these constitutions regulate the legislative, executive, and judiciary branches of the federated states. The federal administration does not interfere with the local constitution and law making of the states and does not try to change the administrative structure of the states unless it is against the federal constitution. In the states, the most important representatives of the state are the governors. State governors can veto local council decisions on certain issues. This right of veto arises especially during the creation of state budgets. Today, the power of mayors in the US has started to increase. Therefore, the powerful mayor model has

been created in the states. The federal administration structure that connects all states is reflected in the smallest local government units of the country.

Relatively to many other developed countries, the young US offers a unique model with its dynamic, pragmatic, transformational, and innovative structure influenced by the private sector. Public administration can effectively serve a large population in a large geographical area. The fact that it is an exemplary model with its multicultural structure and successful institutions makes the USA the center of attention and research of comparative administrators (Table 4).

Table 4 Main features of public administration system in US

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Administrative history	Geopolitical situation	Strategic
	Colonial history	Yes UK before 1776
	Legacy of bureaucracy	Yes (UK Colony)
	Centralized bureaucracy	Weak
	Role of military	no military influence
	Political culture	Very Liberal
	Administrative culture	participative
	Professionalism	High
	Politicization of bureaucracy	moderate
Legal structure	Dominant state ideology	Secular
	Nature of constitution	Written
	Origin of constitution	1787
	Strong constitution	Yes
	Constitutional rigidity	Yes
	Created by	civil initiatives
	Revised by bureaucracy	civil initiatives
Central governments	Administrative judiciary system	weak
	State structure	federal
	Government structure	Presidential
	Hierarchical structure	weak
	Local extension agencies	limited to main areas
	Central government	NA (federal)

(continued)

Table 4 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Local governments	Coordinating mechanisms	Existence of coordinating internal and external structure/agencies strong
	Transparent financing system	Strong
	Monitoring	Strong
	Independent regulatory agencies	Exists
	Financial autonomy	Strong
	Political autonomy	Strong
	Council types	Both Council mayor and council manager
	Mayors	Elected and appointed
	Decision making bodies	Exist councils
		Central tutelage/monitoring
Intergovernmental relations	Subsidiarity principle	Exist
	Decentralization type	Deconcentration
	Logic for Division of tasks	Fair and rational
	Tutelage/monitoring	Non
	Communication	strong Formal
Public personnel system	Civil services	Career based Not very Prestigious
	Scope of civil services	6.5% of employment
	Recruitment and promotion	Competitive not political fair
	Nationwide exam	does not exist
	Politicization in general	Weak
NGOs/civil society	Unionization	Weak
	Size of Civil Society	1.41 million NGOs % 5.4 of GDP % 9.2 of employment
	Institutionalization	strong
	Partnership with the state	strong
	Political pressure/domination	Weak
	Major financial revenues	Membership fees, operating incomes,
	Supportive national culture	strong
	Political regime and civil society relations	strong
	Civil society	Prestigious

(continued)

Table 4 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Reform philosophy	Dominant reform paradigm	Governance and technology reforms
	Policy Transfer	Policy adaptation Policy entrepreneur
	E-government reforms	Completed
	Artificial intelligence (AI) reforms	Exist
	Influence of international actors	weak
	New reforms (5 years)	...

Source Adapted and developed from Önder, M., & Zengin Ü. N. (2022). A framework for comparative analysis: Public administration across the globe. In M. Onder, I. N. Nyadera, & M. N. Islam (Eds.), *The Palgrave handbook of comparative public administration: Concepts and cases*. Springer Nature Palgrave Macmillan

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Republic of India

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I INTRODUCTION

India, located between two states, Myanmar and Pakistan, is well known for two main things: 1- being the world's largest democratic country and 2- being an overly populated state with the expectation of overtaking China's population in the coming year of 2028 (BBC, 2018). However, its strategic position at the top of the Indian Ocean helps in the profitable engagement with globalization (Islam, 2019a, 2020). Currently, the growing weight of India across the world could seek attention toward its dedication to public affairs (Malone, 2011). India is a Sovereign Socialist Democratic Republic

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country. Its government follows a parliamentary system with the combination of a federal structure from a centralized government to state and local governance. India became independent in the year of 1947, and on January 26, 1950, their constitution was approved although it was amended many times. India consists of a prime minister, president, and council of ministers. The prime minister has a very powerful position on deciding executive and legislative procedures for the country. The president holds the chief position at constitutional issues. The council of ministers is elected coincidentally with the prime minister. India's administrative system is governed through the process of central, state, and local division. The central governance is in the state administrative level; the council of ministers is the administrative head who govern the state as governors, and the local administration also governs the decentralized system through the direction of the central government. The English common law, compulsory ICJ jurisdiction, and reservations are the legal base of system in India where judicial review of legislative proceeds is limited. Most importantly, India has a personal law system that concerns religions such as Muslims, Christians, and Hindus. The political culture of India has maintained a democratic political system with its population of 1.3 billion. An important thing can be mentioned about this country's development processes, particularly their educational and learning development process, which has educated and qualified scientific and technical populations, making India the world's largest trained population. Additionally, they became self-sufficient in food production by using the Green Revolution agricultural technologies, building themselves an economically self-sufficient country by an amalgamation of Marxist socialist development and complimentary venture from the 1950s to the 1970s, which led them to a significant industrialized country (Library of Congress, 2004). According the CIA world fact book,

“India has different religions such as Hindu (79.8%), Muslim (14.2%), Christian (2.3%), Sikh (1.7%), and other unspecified religions 2% (2011 est.) Where their population growth rate is 1.19% (2016 est.). The urban population rate in India is 32.7% of total population (2015), whereas the rate of urbanization is 2.38% annual rate of change (2010–15 est.). Additionally, Indian people have different languages, for instance only 41% people communicate with the Hindi language, whereas the rest speak; Bengali (8.1%), Telugu (7.2%), Marathi (7%), Tamil (5.9%), Urdu (5%), Gujarati (4.5%), Kannada (3.7%), Malayalam (3.2%), Oriya (3.2%), Punjabi (2.8%), Assamese (1.3%), Maithili (1.2%), and other (5.9%)” (CIA World Fact Book, 2017).

The people in India commonly speak English, as it is their secondary official language. Hindi and English are both their most used languages for their national, political, and commercial communications. India has divided its administration into 29 states and 7 union territories and is controlled by the center. Political party who gains majority of seats in the parliament forms government at the center. The legislative branch of India has governed the system of bicameral parliament where 233 parliament members out of 245 seats were elected indirectly by proportional representation vote of state

and territorial assemblies. The President of India appointed twelve members for a six-year term for the Council of States or Rajya Sabha. Additionally, the House of People or Lok Sabha consists of the 545 seats where 543 members of the parliament are elected directly through single-seat electorates by majority vote. Before independence, India has a dark British's colonial history from the mid-eighteenth century to the mid-twentieth century. Policies, programs, and acts, which were brought by the British to administer the colonial India, were precisely to serve their own interest (Tharoor, 2016). However, India's long struggle against the British gave the birth to its largest democracy in 1947. Factors like myriad social division, widespread poverty, and low literacy levels put the new country at odd situation to be achieved to gain the status of a successful democratic nationhood (Shani, 2017). The increasing societal complexities and growth of governments on democratic lines in the post-independent India preferred the emergence of the Development Administration in India. It set the state to shoulder the responsibility of "achieving modernization, industrialization, self-reliance, social justice and economic growth" (Pai Panandikra, 1974). In the last decade of twenty-first century, India faced the emergence of the global economy, the rise of transnational bodies, international laws, and hegemonic power blocs which had potential to subscribe changes in the role of the nation-state (Narain, 2018). Under this affects in 1990, India brought the policy of liberalization, globalization, and privatization (LPG) for improving and reforming public administration and governance and to make globalization and governance work for all, i.e., eliminating poverty and economic disparity and enforcing human rights and democracy (Balasubramanian, 2001). The LPG policy changed the role of the state administration in India toward more of governance and then of direct engagement in the larger public affair and governance emerged out of the LPG policy, materialized the relationship among the state, market, and NGOs in India. The process of governance gives more preference toward 'market' as against of 'state' as a key regulator of society and economy (Bhattacharya, 2013). Mohit Bhattacharya in his book "*Social Theory and Development Administration*" elucidated that what emerged as the 'governance' philosophy came to be called the "New Public Management."

According to the need and situation, the nature and role of Indian Administration appeared to be very clear. Interestingly, it evolved from Traditional Administration to Development Administration and reached to New Public Management in the form of network governance. The study attempts to enrich the understanding of current administrative practices in India in the neo-liberal framework. Therefore, it analyzes administrative and governmental system of the India with its administrative history, central local governments, intergovernmental relations, public personnel system, civil society, and recent reforms and developments affecting the public administrative structure.

2 ADMINISTRATIVE HISTORY

India has a vast history of administrative development, particularly in the administrative historical background of India, that started about 5000 years ago, called Indus civilization and culture (Islam, 2021). In addition, the Indian administrative history covered with the ancient period of “Magadha, Mauryan, and Gupta Ages, Kautilya’s Arthashastra” was the best treaty in Indian political institutions and state administration history. The major development of Indian Administration can be divided into two periods: the pre-independence period, which existed in the Mughal administration, and the British East India Company administrative that ruled India from 1757 to 1857 (Singh & Singh, 2011). The administrative unit’s levels had significant powers that continued till independence. During this period, the Government of India Acts of 1919, 1929, and 1935 were the pillars of Indian Administration and the legacy of colonial administration and were based on the maintenance of law and order (Misra, 1970). Furthermore, the post-independent public administration development period involved the concept of national administration and state administration evolved with the beginning of India’s many administrative development programs. However, monopoly capitalism and building the nation-state lead to centralization over emphasizing on the concepts of unity and integrity, unbalanced growth, and preference to loyalty over merit, and even the local administration of India emerged with the evolution of the local government with an objective to strengthen the administrative system for better development and growth (Kabra & Nayan, 1990). The phase of the New Development Administration has started from citizens’ rights to grievance redressed bill, 2013, where this bill was emphasized on accountability and transparency through creation of grievance redressed mechanism and institutions. Indian administrative development can be traced from two ways such as pre-independence administrative development and post-independence administrative development.

2.1 *Pre-independence Administrative Development*

2.1.1 *Roots of the Indian Administrative Tradition*

There is lot to say about the Indian contribution to public administration (Gladden, 2019a). A vivid evidence of public administration of early India appeared roughly around 200 CE (Common Era) when *Manusmriti* was composed. It was a code of conduct to regulate the affair of a rigid hierarchical society, organized of four kinds of communities, known as Brahmins (acclaimed the sole authority on Vedas), Kshatriyas (land owner), Vaishyas (trader), and Shudra (service provider). It was used to refer the duties and responsibilities of the king and his administrators. However, it gave unlimited power to the king, yet stressed that the king should discharge his duties in consultation with his ministers (Rao, 2005). The administration system and governmental process of the Mauryan and Gupta eras had the same legacy

of the administrative process written in India's history from 321 to 296 B.C. The state administration was governed by the rule of kings with the king's powers and obligations, including the king and his ministers' body with the Janapada, Durga, Treasury, military, revenue, and human resource administration. The important administrative process was taken from the '*Arthashastra*' giving the following principles for Public Administration: particularly in yearly budgeting, planning for the administration, unity and command for the military, social welfare, decentralization of the local government, and recruitment process for the administrative system on the base of qualifications where civil services will be appointed through the process of the hierarchy system. Additionally, the administration of the Mauryan era functioned by constitutes and component processes for restoring security of person and maintaining the law of order, and the military used against hostility. Moreover, the ministerial body of the Mauryan era worked for the development services of the state where the empire was totally controlled by the central government and some provinces were autonomous under the "feudal-federal kind" of institution, which were functioned and divided into districts and districts into villages through the hierarchical process. However, in Kautilya's *Arthashastra*, the administrative system of that period looks more organized than the earlier system. The *Arthashastra* is administrative book that consists of XV volumes, which attempt to set forth general principles and detailed rule for administering a state. Its primary purpose is to direct the king in the matter of extending and preserving his territory through any means (Sapru, 2014). During the fourth century, the kings of the state were despotic because they were out-and-out in the matter of wielding unlimited power. The council personages used to act as supportive hands to deal with the others' crucial affairs like legislature, finance, and foreign affairs. Normally, the cities were administered by large commissions who were the officers appointed by the state. There was a proper system of law courts to deal with the justice head by the king (Gautam, 2013).

During the time of the Moghul Empire, the administration was governed by the centralized system. The empires' administrative agencies and institutions included central, provincial, and local administrations that were directed from the king. The most important administration of the Mughal Empire was the revenue administration that was the source of the empires' income, such as the revenue from the land as it was the primary basis of income for Mughal Empire.

In the medieval India scholar evidence that change came due to impact of two different religions of Buddha and Mohammed permit a settled pattern of administration to emerge, capable of providing a stabilizing factor for future generations. Like *Arthashastra*, the Abul Fazal's *Akbar Nama* and *Ain-i-Akbar* give voluminous information about the administration practicing during the Akbar time. Akbar is one of the greatest kings in the medieval history of India. He used to organize a daily meeting famously known as the

Jharoka-i-Darsham in his courtyard. All citizens, officials, merchants, and peasants had to assemble to receive the royal blessing and redress their grievance without any formality. The responsibility of the king was shared among the four ministers who consist of (1) revenue and finance department (2) military department, (3) factories and stores department, and (4) judicial department. These ministers were holding very much redundant. The administrative system was practicing under the scheme of checks and balances. Persons held position in the court could not hold any position in any of the central departments. The councils were free to share their opinion on the wide range of state activities, decided by the king. Administrative procedure practiced during the Akbar time is an outstanding example of rational and impersonal administration in the history of medieval India (Gladden, 2019b).

2.1.2 *Development of Indian Administrative Tradition Under Colonial History*

The advent of the British rule and its administrative system in India is important, and close attention should be paid to understand India's past and present administrative system. The East India Company began in India to trade but came to an end by administering India in 1858. On December 31, 1600, the British came to India with the 'East India Company'; their only purpose was to trade and do business in the region. The company's main objective was to trade in the eastern parts of the world, such as present India, Pakistan, and Bangladesh. Initially, the early years of the British East India Company's recruitment process were maintained through commercial rules. The governing system of the East India Company was previously commercial through the council of government which had power over the governor and governor-general body via the executive and legislative process under the electoral system. Additionally, for its revenue, railway, and judicial services management, the company had a board system. The revenue board dealt with work record for counseling, discussion, deliberation, judicial, and legislative policies and principles. The board was the head of medium. The British government first initiated a regulation to the company's activities, wars, and unsettled situation in India through the Regulating Act of 1773. The advent of this act provided a little legitimize government by making provision for a governor-general and a council of members for administering the territory. This provision revised the new constitution of the government which was different from the Mughal Pattern. However, the provision made in regard to the governor-general in council of members was diluted in the amending Pitt's India Act 1786. However, in 1813 Charter Act, the company lost its status of trading monopoly in India and was reduced to purely for administering the affair of the British Parliament (Misra, 1959).

The British Parliament gave a loan of £ 1,400,000 to this company, and as a result, the British had the power to exercise and interfere on political matters and activities of the East India Company. From this time forth, the British

government took the rights to make their influence on the Indian Administration through the desires of the British Parliament (Misra, 1970). That brought the whole system of the East India Company under proper checks of the British Parliament.

A series of changes in the Indian Constitution and Administration were happened during the British period such as the commercial and political activities when the Company Pitt's India Act 1784 was introduced. The Amending Act of 1786 was introduced to protect the interests and security of the company. In 1784, three branches of central secretariat were formed to administrate the common, revenue, and business and legal branch, which were documented in 1793. In 1815, departments were reconstructed and the Territorial Department was added, where the company got the imperial grant for the tax collection in 1765, especially in the areas of Bengal, Bihar, and Orissa; in 1772, the revenue commission was formed with the formation of district collector which included the Divisional Commissioners and administration of criminal justice and police enacted in 1787 with the formation of responsibilities of the Judges.

In addition to reformation of the British Administration rules and regulations, the Indian Councils Act 1861 was enacted for insertion of non-official members in the administrative board for implementing the elective powers over the economic budget decided within the executive. The Indian Councils Act 1892 was enacted. The Morley Minto Reforms enacted in 1909 to increase the strength of the legislative councils and the Montague-Chelmsford Reforms in 1919 for the preamble of the Governance of India which declared the policy of the parliament, development of self governing institutions. The administrative system and Government of India under the 1935 Act, where reforms were precluded under the Simon Commission in 1927, the Nehru Scheme in 1928 and Jinnah's Fourteen Points in 1929. It was featured and altered, and several suggestions and recommendations were given to the round of table conferences for self-governing institutions. Additionally, Indian civil, police, and medical staff were classified accordingly by this act which is generally functioned by the state secretary. The administration of finance adjusted by the revenue system shaped the main income source for its provinces under Act 1935, and the local administration experimented on the Community Development Movement under the Panchayati Raj process of participative development.

2.2 *Post-independence Administrative Development*

India got independence on August 15, 1947; the Indian Administration post-independence situations was very effective and stable. This political stability happened only for the Indian people and their desire to form an independent government from the British authority. Couple of years after independence, India adopted its own constitution, which was accepted in the democratic constitution and voting process for electing the parliament members and

introduced the new executive and legislative systems for governing the new Indian Administration. It was the first Constitution of India that gave the individuals liberty and freedom of political groups and recognized the minorities’ rights. The constitution holds the Indian political structure through the process of federal or quasi-federal system, which includes the union (central) government, state governments, and local governments. The selection of meritorious public services and civil services is accepted through the Indian Public Service Commission where the central and the state have different recruitment processes according to the Indian Constitution. The administrative system for the public recruitment was partially legislative, controlled throughout the periods of 1920–1935, 1937–1939, and 1946–1947 for elected representatives and the ministers who are responsible for their posts which gives the administration stability in India after their independence (Koske et al., 2016; Sapru, 2014).

After gaining their independence from the British government, the newly formed Indian Government was functioned accordingly in these eighteen departments (Table 1).

Governing the administrative affairs, secretariat departments typically worked accordingly to the following departments (Table 2).

Rural, education, agriculture, health, and medical developments were the main prioritized issues for the post-colonial and post-independent Indian Administration. For the Indian state diversity and complexity, Indian Administration adopts the socialist and welfare-based new economic system where

Table 1 Post-independence Indian government departmental organizations

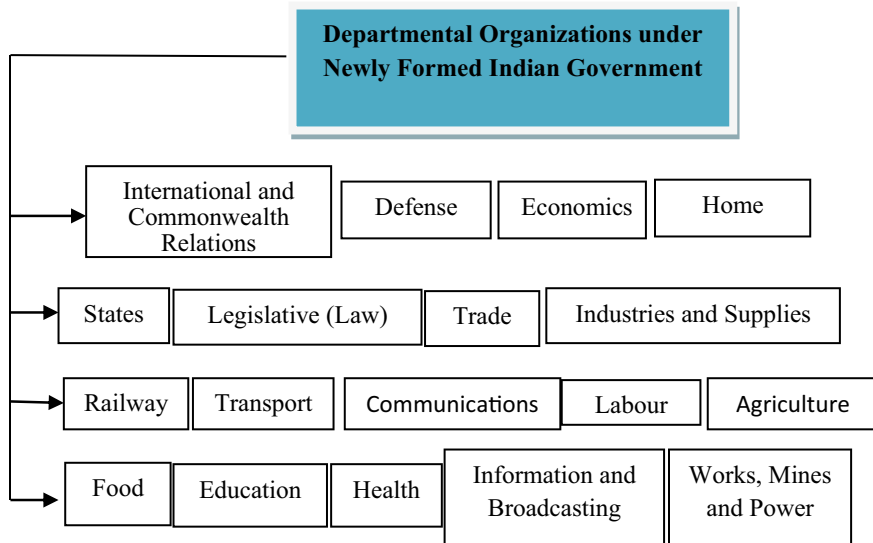


Table 2 Secretariat departments of state governments

General Administration
Home Department
Revenue and Forest Department
Agriculture, Food and Cooperation
Education and Social Welfare
Urban Development and Public Health
Finance
Structure and Communication
Irrigation and Power
Law and Judiciary
Industries and Labour
Rural Development

scientific and technical activities assumed the greatest and effective future goals for successful Indian Administration.

After independence, a number of new services were introduced such as the public services under the All India Services including Indian Civil Service, Indian Police Service, and Public Service Commission for ensuring the impartial selection of meritorious civil servants, enacted federal system administration through the Indian Constitution under the umbrella of the union (central) government.

3 ADMINISTRATIVE AND GOVERNANCE PROCESS

The Constitution of India clearly separated the administration and governance from union to state and from state to local government by dividing its power. Union is governed through executive, legislative, and judicial branches. The structure of the state governance in India follows central administrative pattern. The Indian Parliament is a bicameral system where both the prime minister and the president are elected by the constitutional process and Supreme Court of India, playing the judicial activities of the administration.

The current Indian government administrative structure is a quasi- or semi-federal structure which contains the three cycles for governing the country through the allocated responsibilities and duties of central or union administration, state administration, and local administration. Figure 1 shows the structure of Indian governance and administrative system from central to local level.

3.1 *Central Government*

India's Central administration also called the union government is divided into three main sections, namely the executive, legislative, and judiciary powers; the structures are shown in the Table 2 (Government of India, 2017). The Indian constitutional framework is very important and its central government powers

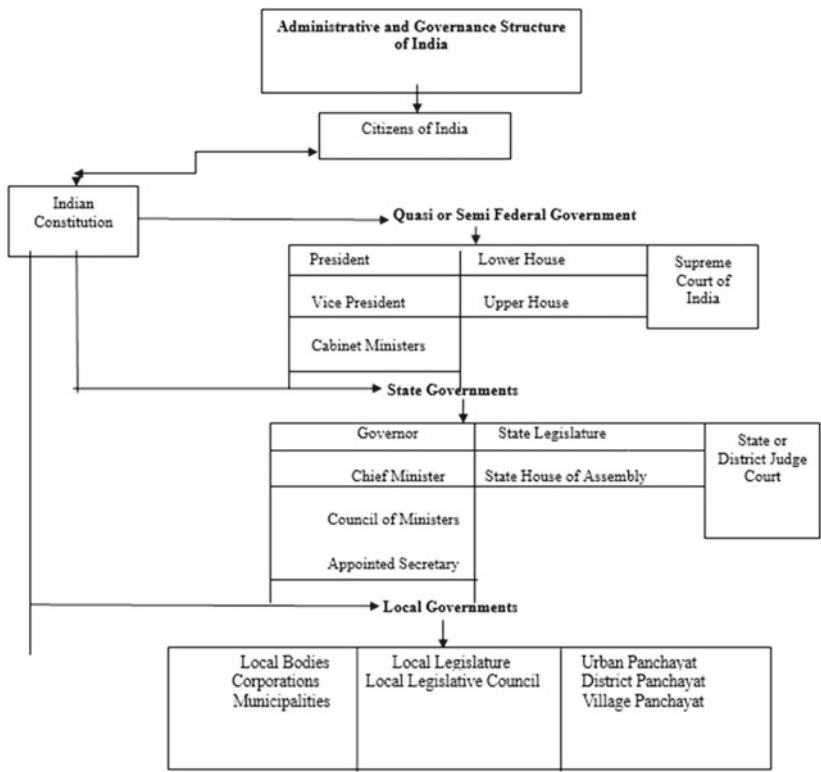


Fig. 1 Administrative and Governance Structure of Republic of India (Prepared by the Authors)

must be understood. Additionally, the activities and works of the central secretariat, the functions of the Prime Minister’s Office (PMO), the structure and roles of the cabinet secretariat, functions of the Union Public Service Commission (UPSC), and All India Services (AIS) are contained under the Central administration of India (Dandekar, 1987; Kashyap, 2011) (Fig. 2).

3.1.1 Constitutional Frameworks

The Indian Constitution is a written and lengthy detailed constitutional document. The Chapter on Fundamental Rights in the Indian and USA Constitution follows the UK Constitution by the parliamentary government. Moreover, the “Directive Principles of State Policy” from the Indian Constitution had thought to be taken from the constitution of Ireland. The German Reich model of the constitution was followed for the provisions concerning emergencies and the Government of India Act, 1935 (Amery, 1953; Government of India, 2020; Indian Administration, 2010; Kashyap, 2011; Raju, 1991).

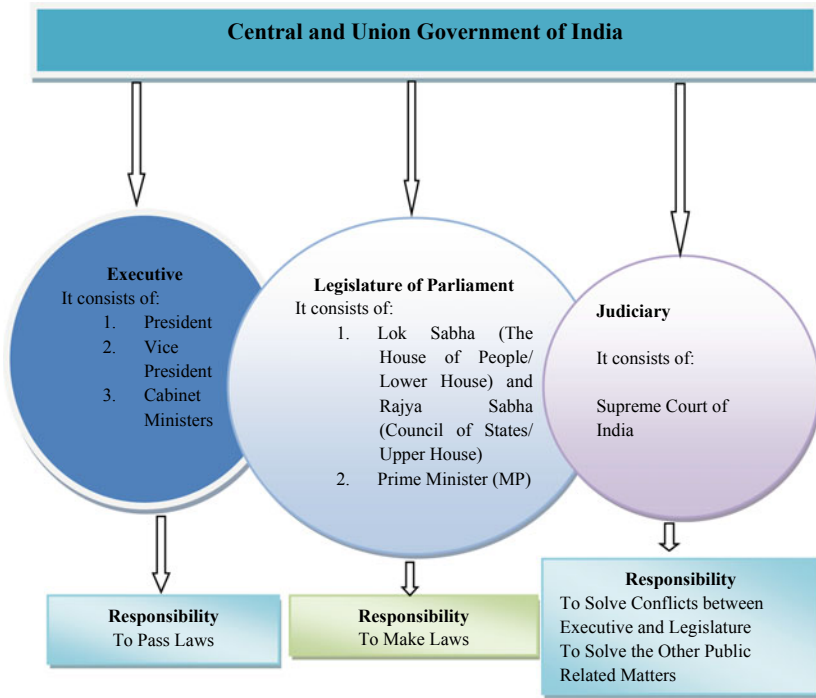


Fig. 2 Functions and responsibility of Central or Union Government of India (Prepared by the Authors. *Source* www.elections.in, 2017)

On November 26, 1949, the constitution consisted of Parliamentary Democracy. Part III of the constitution discussed Fundamental Rights contained in Articles from 12 to 35. The Directive Principles of State Policy contain the Articles from 36 to 51. Additionally, the 42nd Constitutional Amendment was taken for the fundamental duties' amendment in 1976, and ten duties were included that specified the fundamental duties from Article 51A of Part 4A (Pylee, 2012). The basic characteristics of Indian Constitution contain some important features which are shown in the Fig. 3.

3.1.2 *Function and Power of Parliament*

The Indian Parliament has a multi-dimensional function that works as an institution. For legislature issues, the supreme law-making body provides the laws and makes the legislatures on any matter including the Union List or Concurrent List, on residuary subjects. In case of emergency, the president can proclaim new laws allowed by the constitution. Additionally, the parliament controls the executive through questions, adjournments, censure, cut-motion, etc. Financial functions of the parliament consist of the passing of the Union Budget. The parliament can impeach the president, the Supreme Court, and

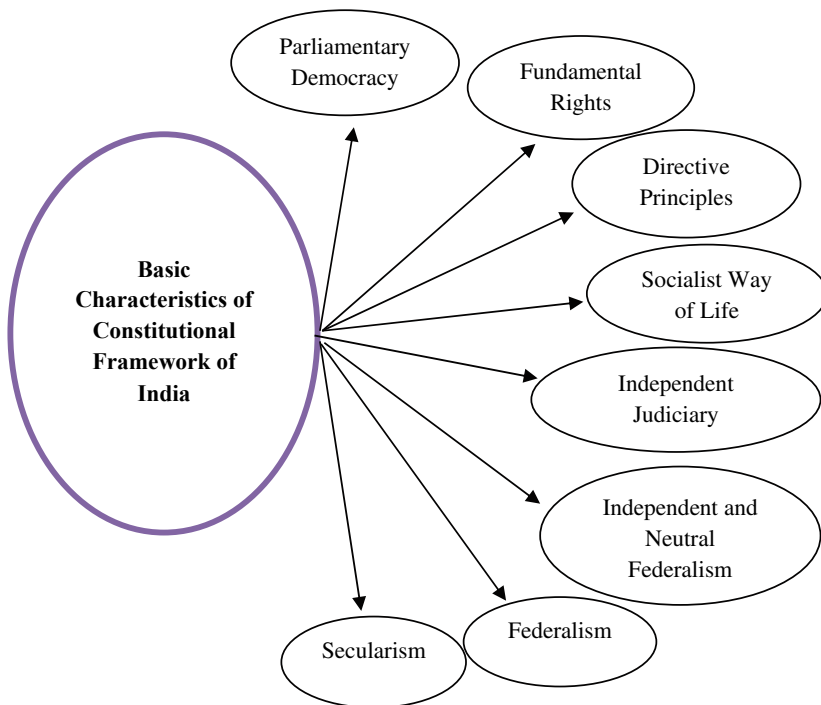


Fig. 3 Basic characteristics of Indian constitutional framework (Prepared by the Authors)

High Court judges (Dam, 1966; Lal, 1967; Rakshit, 2004; Singh, 2007) (Fig. 4).

3.1.3 Roles of Council of Ministers

The council of ministers is headed through the Prime Minister of India. The 91st Amendment of Constitution Act, 2003, includes the total number of ministers. Additionally, the number of the council of ministers shall not exceed 15% from the total number of members of Lok Sabha. Cabinet ministers, deputy ministers, and ministers of state will be classified under this department. They are responsible for their activities to the parliament members of lower house of India and they work for the government policies of India.

3.1.4 Functions of Central Secretariat

Under the central government of India, the central secretariat offices and departments work, which includes the administrative body of the minister, the secretary, and the executive head (Singh & Singh, 2011).

The functions and role of such central secretariat officer’s functions like a hierarchical process such as the secretary post who is the chief of a ministry or any administrative department, additional secretary, joint secretary, director,

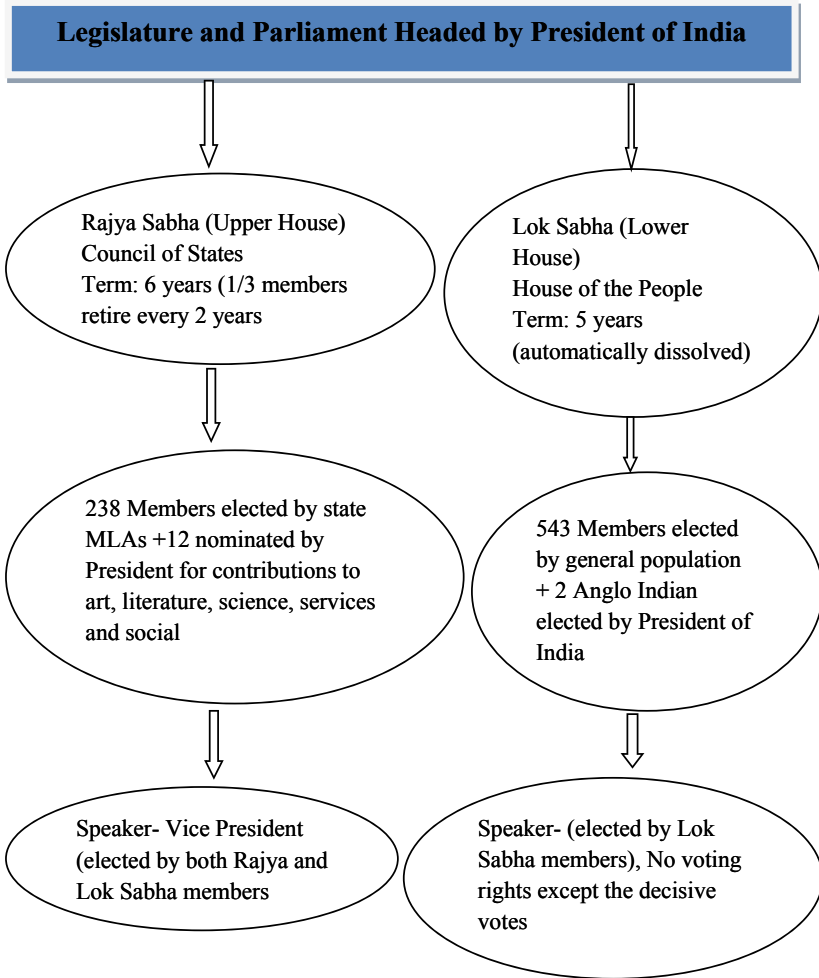


Fig. 4 Functions of legislature and parliament of India (Prepared by the Authors. Source www.elections.in, 2017)

deputy secretary, undersecretary, officer for special duty and section officers like clerks (Jayapalan, 1999: 154).

3.1.5 Functions and Roles of Prime Minister's Office (PMO)

The Prime Minister's Office (PMO) of India is functioned by the immediate staffs of the prime minister and they are functioned through their activities through the principal secretary for secretarial assistance to the prime minister. The main object of the PMO encompasses and deals with the anti-corruption unit and the public wing where the office will coordinate with central cabinet

ministers and state governors and ministers of India (Indian Administration, 2010). Most importantly, the activities of the PMO department include “military and security-oriented matters” (Islam, 2019b), policy issues, and Indian foreign dealings such as proposals for appointment of Indian heads of missions abroad. Overwhelmingly, every governmental policies including national, international, state, and local policies will be functioned under this administration (International Business Publication, 2011). The Prime Ministers funds which literally operated through the PMO administration for the Prime Minister’s National Relief Fund (PMNRF) and the National Defence Fund (NDF).

3.1.6 Functions of Cabinet Secretariat

The monthly activities of the president, vice president, and ministers will be summarized through the Cabinet Secretariat administration. It will assist to the cabinet and cabinet committees for any works of the prime minister such as any agendas, circulating papers to the related ministry, and documentation of the papers, and any consent of the prime minister will be added under to the Cabinet Secretariat administration (Bhatt & Bhargava, 2005).

The main purpose of the Cabinet Secretariat department is to coordinate with ministries and inter-ministerial matters that will lessen the difficulties and delay process in the activities of central administrative system for policy coordination and implementation.

3.1.7 Role of Union Public Service Commission (UPSC)

The Indian central civil services examination functioned through the Union Public Service Commission (UPSC), the central agency board arranging civil, engineering, defense, medical, railway, statistical, economic, geologists, and armed police force examinations (Competitive Excellence Center, 2012).

The Indian constitution from Articles 315 to 323 of part XIV deals with the process of this administration which includes the Public Service Commission for central and each state of India.

3.1.8 Roles and Functions of All India and Central Services

All Indian Services are those services that are common to both central and state governments. Figure 5 shows the All India Service processes under the Civil Service of India:

3.2 State Government

3.2.1 Powers of the State Administrative Governments

The Constitution of India develops the powers of state government, which contains Article 246. In accordance with Constitution of India, the central government has the power to give instructions to state governments to the exercise of their executive powers. The state administration should follow the central laws. The central government can interfere in state executive power

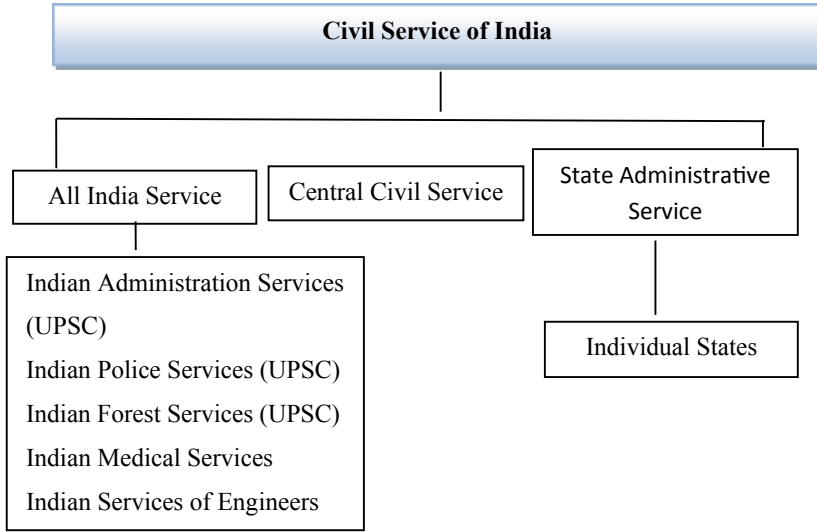


Fig. 5 All India and central services processes (Prepared by the Authors)

whenever they need to, i.e., times when there's a national emergency or military necessity.

Figure 6 will show the process of state legislature or state assemblies headed by the chief minister.

3.2.2 Administrative Structure and Division of State Governments

India is a union of state which consists of 29 states and 7 union territories where state boundaries are characterized through the process of language or other socio-cultural distinctions. Figure 7 will clarify the structure and process of state governments in India.

3.2.3 Role of State Governor of India

The state governor in India is the executive head of state and he or she will be appointed by the Indian President. The tenure of the governor is appointed for five years. The governor plays the important role of appointing the council of ministers. He is responsible to present the state budgets in every year through the state legislation.

3.2.4 Roles and Functions of State Council of Ministers

The governor will appoint the council of ministers through the recommendations of the chief minister. "Cabinet Ministers, Ministers of State, Deputy Ministers, and Parliamentary Secretaries are the exact categories of state council of ministers. The state council of ministers is the highest policy-creation body of the State government."

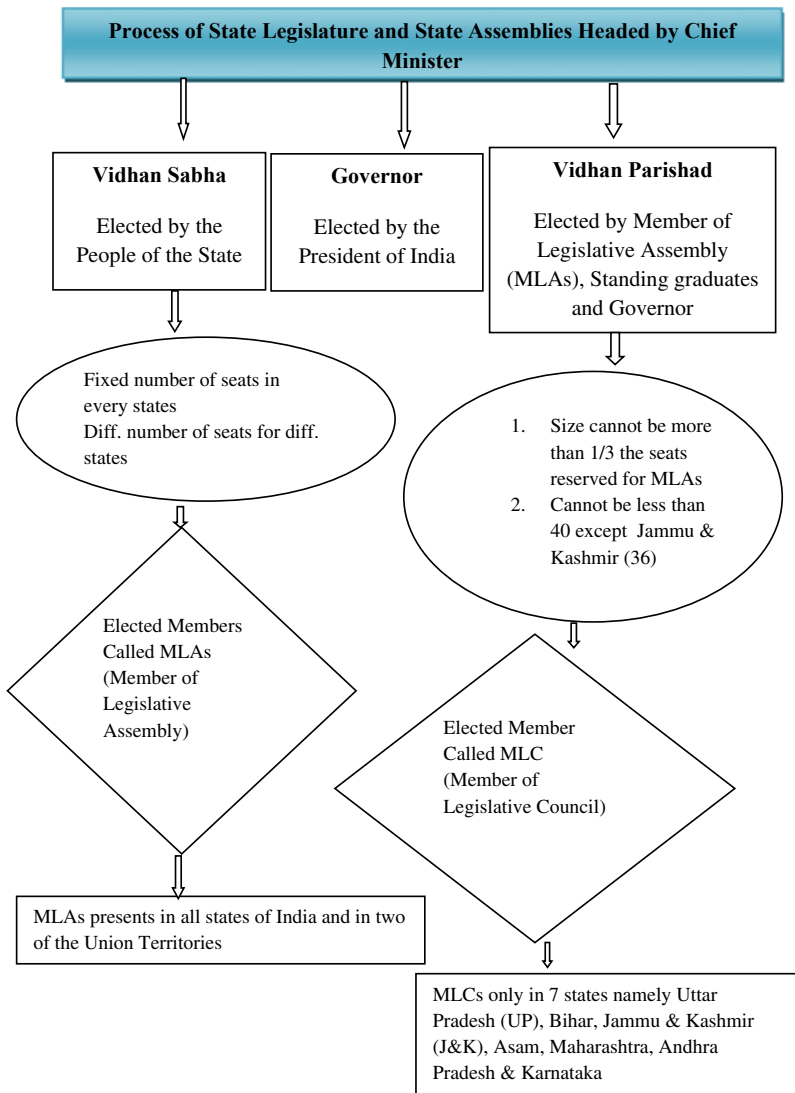


Fig. 6 Process and structure of state legislature and state assemblies in India (Prepared by the Authors. Source www.elections.in, 2017)

3.2.5 Roles and Functions of State Chief Minister

The state chief minister has the same responsibilities as the prime minister who has responsibilities in the central government. He or she holds the very special executive powers of the state. “The Chief Minister is appointed through the Governor and holds Office throughout his pleasure where he or she is the leader of the Council of Ministers”. Additionally, The state chief minister is

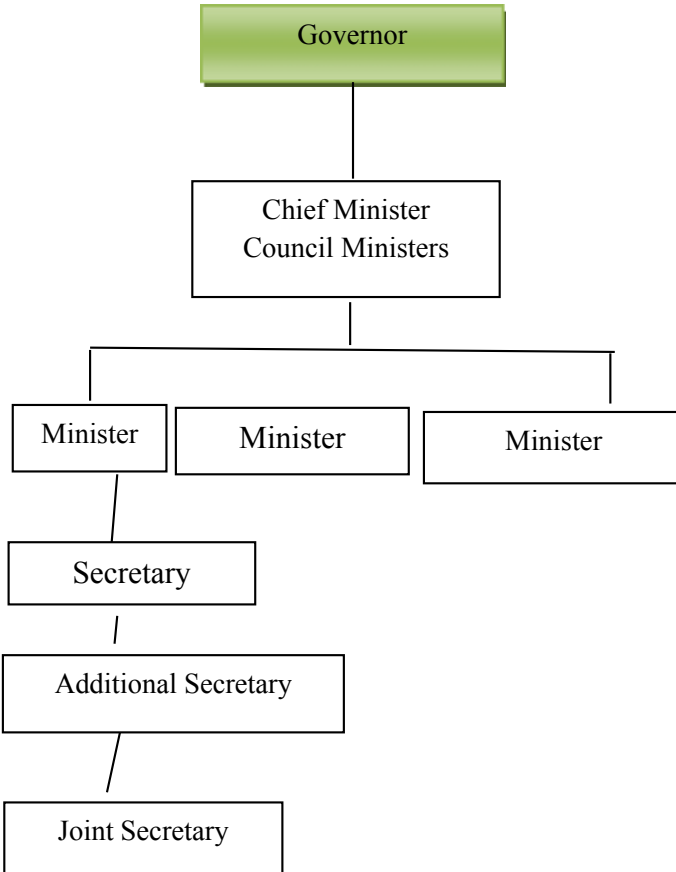


Fig. 7 Administrative structure and process of state governments in India (Prepared by the Authors)

also the leader of the house he or she controls and approves the bureaucracy of the state such as secretaries and additional/joint and deputy secretaries.

3.2.6 *Role and Functions of State Secretariat*

The main role of State Secretariat is to assist the ministers of states for policy creation, modification, implementation, and coordination. Most importantly, reviewing the budgets and managing expenditures and coordination with other state governments, central governments, and state secretariats is an important department in the states of India.

3.2.7 *Functions of Civil Service System at the State Stage*

The civil service examination system in the state level is furnished with two separate components such as state services and All India Services. State services

recruit their employees through the respective public service commissions or other agencies. Generally, state services are under the central or All India services recruitments because of the administrative hierarchy from the central to state administration.

3.2.8 *The Relations and Differences Between Central and State Governance of India*

Distribution of power-based relations between central and state government of India has 56 Articles from 245 to 300 in Part XI and XII. In the Indian Constitution, the state-center relations contain the legislative, administrative, and financial relations between center and state governments of India (Ramesh, & Joon, 2014). Moreover, there are some differences between the central and the state governments. However, the state government receives revenues from the central government according to their necessities. The central government is always superior hand in taking control of the state government in majority of issues. The local administration and governance collect important taxes, and the state government has the power over the central government. There are subjects like education, transport, criminal law, etc., where both can issue ordinances and enact laws (www.differencebetween.com, 2011).

3.3 *Local Governments*

3.3.1 *Scope of Local Governance*

For the directorates, the intermediate stage in the administrative agency effectively coordinate and supervise the field operations for policy execution. These kinds of execution in policies take place in the field of districts, blocks, and villages. The districts are referred as ‘Local Administration.’

Mainly States in India are comparatively large, both in area and population even the six largest States together cover almost 61 per cent of the area of the country. In such large States, there are wide variations in the socio-economic and geographical characteristics of each region. This underlines the need for a local stage in the administrative set-up. On the one hand, policy formulation and coordination can be better achieved at a stage intermediate flanked by the District and the State Government of India; on the other, the State Government being comparatively remote from the locale of policy implementation, cannot assess local troubles in their proper perspective. So in the intermediate level, seniors and experienced peoples are needed for the policy formulation stage at the State Headquarters and the implementing stage in the district.

3.3.2 *Local Administrative Units*

The foremost function and unit of the local administration in India are supervision and organization of the work of the district stage. Figure 8 will identify the local administration structures and functions in India.

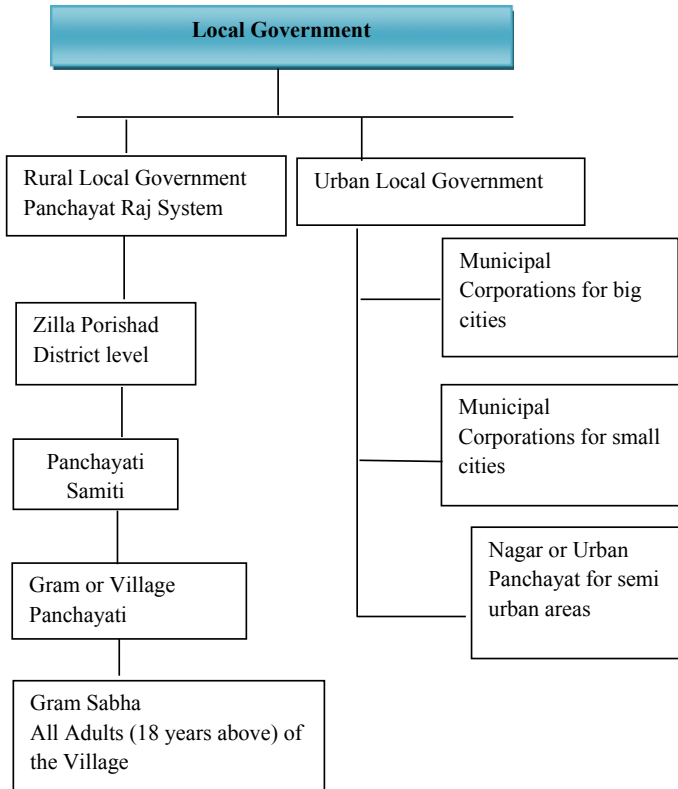


Fig. 8 Local administration structures and units in India (Prepared by the Authors)

3.3.3 Role and Functions of Divisional Administration

There are two dissimilar systems to identify the functions of divisional administration to ensure the local administrative governance such as divisions, which consist of few districts. Decentralization is a very good medium to measure the divisional and territorial administration. The main purpose of this administration is to coordinate with divisional commissioner for policy formulation.

3.3.4 Functions of District Administration

District administration is a substantial territorial unit for administrative operations in the root level of India. The main purpose of the district administration is for the development of the rural community through the Community Development Programme. Balwantrai Mehta Committee in India recommended the structure of local government particularly in the village, block, and district stage. It was done by introducing the Panchayati Raj system in some states like Maharashtra and Gujarat.

3.3.5 *Financial Structures of Local Governance*

The municipal authorities' primary income contains the statutory imposed by municipal council for the taxes such as "tax on structures and lands, which besides a general tax also comprises rates on water, lighting, fire service, etc.; tax on structures payable beside with the application for sanction of the structure plan; tax on professions, trades etc. tax on vehicles (other than motor vehicles), tax on animals; tolls on roads and ferries. Additionally, non-tax sources contain the rents on land and houses; sale proceeds of land and other products of land; fees from educational institutions; license fees; fines for violating municipal through-laws and other fines and fees, and receipts from slaughterhouses. In addition, there are provisions for shared revenues, grant-in-aid and loans from the Government and financial institutions, besides tax and non-tax sources" (Eiilm University, Public Administration Syllabus, 2010).

Furthermore, the financial source of Panchayati Raj as they collect funds from three sources, i.e., the local body grants, centrally sponsored schemes, and state funds.

3.3.6 *Social Audit as a Feature of Local Government System in India*

The concept of the "social audit is a scrutiny and analysis of working of a public utility where its social relevance from the perspective of the vast majority of the people in the society." Independent Commission is the part and parcel of the US President and often treated as belong to executive however, in India it is not such. The commission in India can be classified into three broad categories on the basis of origin. (a) Constitutional Commission: Finance Commission, Union Public Service Commission, Election Commission, Backward Class Commission (constitutionally backed), power, function, and authority of these commissions are conferred by the Constitution of India. The commission are appointed by the president but cannot be removed. The constitution status attends by the commission permit a great amount of autonomy form the other organ of the state. (b) Statutory Commission: it includes commissions like University Grant Commission, Atomic Energy Commission, and Railway Board. Such commissions are created by the Parliament Act and are remained under the general administrative control of Minister of the Government of India. Commission by the Executive Orders: are created by the executive orders and also exclusively controlled by it. Commissions like Central Social Welfare Board, Central Water and Power Commission, and Handi Craft Board do not enjoy full autonomy compared to other commission. In India, policymaker takes huge advantage from these commissions. It keeps off the responsibility of the government and provides a level playing field to all. These commissions are built on expertise and therefore, bit the odd by enforcing authority rapidly and proactively. In India, the functioning authority of these commissions is controlled by the Parliament in the Question Hours, through discussing its issues in the Parliament, by the Parliament Committee, and by the Finance Committee.

4 PUBLIC PERSONNEL SYSTEM

Public personnel system is the backbone of public administration of any modern day's state. Herman Finer says, "Personnel System is the sovereign factor in the public administration." The public personnel system has a very deeper connotation with the recruitment, training, promotion, compensating, discipline, and retirement of civil servants in India. The civil servant dealt with the major part of the state's affairs in India (Yadav, 2010). In India, the civil service does not include military service, judicial services, police service, and the person from the political officer. India follows the merit bureaucracy to select its civil servant, and on the basis of this method, civil servant is inserted in the system. It plays a crucial role in policy implementation, policy formulation, delegated legislation, administrative, administrative planning, regulating public enterprises, assisting minister, regulating financial operations of the state, maintaining public relation, and working toward improving administrations. Personnel in the government are managed under the system of rank classification, in which the personnel are classified on the basis of the position and on the job. The government decides the status and salary of the personnel with reference to the service he/she given. For instance, a carder from All India Services gives service in the various organizations at either central or state government (Fadia & Fadia, 2014). However, he/she would have not lost the status and rank throughout his career. The entire personnel system of All India Service (IAS, IPS, IFS) is managed by the Civil Service Rule of 1930. It has been classified as:

1. All-India-Services
2. Central Services, Class I (Group-A)
3. Central Services, Class II (Group-B)
4. Central Services, Class III (Group-C)
5. Central Services, Class IV (Group-D)
6. Central Secretariat Services, Class I, II, III, IV (Group, A, B, C, and D)
7. Specialist Services
8. State Services, Class I, II, III, IV.

The personnel list adopt on the principle of merit and their positions are assigned. In each department/organization, there is a Departmental Promotion Committee which purposed of selecting the candidates for the departmental promotion.

According to the CIA World Fact Book, based on GDP (Purchasing Power Parity), India is the fourth country in comparison with the world; their GDP was \$8.721 trillion in 2016 est., \$8.103 trillion in 2015 est., and \$7.534 trillion in 2014 est. Even their GDP in real growth rate was 7.6% in 2016 which was the sixth country in comparison with the world and their unemployment rate was 5% in the Fiscal Year- 2016 est. and 4.9% in the FY-2014 est. (CIA World Fact Book, 2017).

4.1 *Role of NGOs and Civil Society Organizations*

According to the United Nations Human Development Programme's Human Development Index 2016, India's rank is 131 and it is classified as a medium human development country in the world where India's life expectancy at birth (years) is 68.3%, Multidimensional Poverty Index (MPI) is 0.282 and Population in total (millions) 1,311.1 (Human Development Report: India, 2016), which shows that India is predominantly agriculture-based country and it requires the NGOs' activities for social and economic sustainable development of this country. Since the second half of the nineteenth century, numerous civil society organizations have emerged and established in India as a movement of sociopolitical program. The Swadeshi movement by Mahatma Gandhi was the one of the great movements in the history of India, especially for economic self-sufficiency where small enterprises like local production were advocated as a tool of development. His main objective is to make a rural areas people development and self-reliance through their own resources; even in that time, Gandhi believed that gram panchayats or village councils are the good way for India's progress, and by which means, political freedom will be acquired through social activities.

After the Independence of India, NGOs' activities were stated for social development through the establishment of the Central Social Welfare Board in 1953 which also gives the NGOs to collect the funding from national and international arena. Additionally, this initiative assists to begin the "National Community Development Program and the National Extension Service Program," and even the Association for Voluntary for Rural Development (AVARD) was followed by this enterprise in 1958. Most of the International NGOs started their activities in India during the 1965–1966 and 1966–1967 through the cooperation with domestic NGOs or established their permanent operations in India.

One estimate shows that today, about 1.5 million NGOs are active in India based on nonprofit and voluntary structure including religious activities in Mosques, Churches, Temples, and Sikh's Gurudwaras. Additionally, health sector, political areas, educational institutions, sustainable development projects, and sports associations are included into the activities of NGOs (Önder, 2006, 2011). The survey showed by Participatory Research in Asia (PRIA) said that in India, 73.4% of NGOs' staffs either paid for one staff or no paid where more than 19 million of staffs are working in NGOs of India (Asian Development Bank, 2009).

5 RECENT DEVELOPMENTS AFFECTING PUBLIC ADMINISTRATIVE STRUCTURE

5.1 *E-Governance*

India is trying to achieve their vision of Digital India through e-Governance system. Plan like 'National e-Governance Plan' (NeGP) took the initiative of

cultivating e-Governance system to deepen the people and the government relation.

The prime objectives, vision, and mission of the e-Governance process in India are to make the government more efficient by increasing its accountability and transparency and increasing citizen participation in governance. E-Governance system includes the e-Health system such as a web-based blood bank management system, e-Health records, and an Internet-based tobacco control network. An E-Districts initiative under e-Governance includes the speedy delivery of services to citizens as centralized software applications for effective state administration. E-Governances in the Rural Agricultural Development, which will help multiple services of farmers for their imports and exports businesses. Additionally, it will provide the online passport help from anywhere at any time, Indian Railway online reservation system, online income tax filling, online land records registration, and e-Biz system which will give the priority on customers more than the departments. Figure 9 will show the Digital India and e-Governance process.

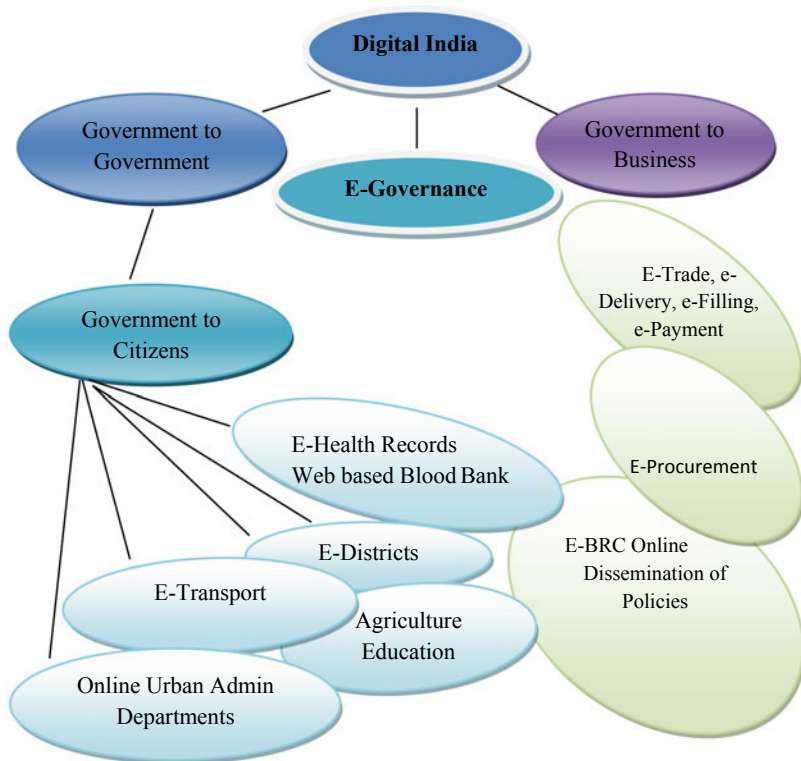


Fig. 9 E-governance process and structures in India (Prepared by the Authors)

5.2 *Information and Communication Technologies*

The Information and Communication technology is a vital factor for public services and its innovation and development. The new ICT project in rural India is one of the best initiatives for making India as digital and potential which encourages the individuals to work with marginalized groups where community development will be prioritized and key factors.

ICT ventures for poverty reduction in rural India with the supporting property market development such as improving access to basic services, i.e., Healthcare Delivery Project.

It helps them play a role for small entrepreneurs. It has regulatory mechanisms, and it helps design projects on related topics. It helps community involvement. It helps to complete information needs, locally-contextualized information, and services. It created awareness-rising and developed training. Lastly, it helps financial sustainability, monitoring, and evaluation. The main object of ICT project is to reach the poor for poverty reduction by that community people empowerment, opportunity, and employment, and ultimately, it will ensure the community development.

5.3 *Basic Reforms Affecting Administration*

India entered the democratic phase in 1947 with the rudimentary framework of government with popular sovereignty, a set bureaucracy to control the rule of law and a popular party command trust of divers (Onder & Nyadera, 2020). Through these inherent apparatuses, she paved the way of democracy by establishing a representative government in the 1952 general election. Constitution came in 1950 become the guiding principle of the country and parliament form out of representative government set the policy in the people interest. But adapting the task of parliamentary-federal constitution and undertaking the responsibility of promoting socio-economic development were quite unnatural for the colonial-oriented administration (Singh, 2012). And to fix it, a large number of committees and commission on administrative reforms were set up by the central government like Report on the Reorganization of Central Government 1945–1946, Report of the Advisory Planning Board (1949), Report of the Central Pay Commission (1946–1947), Report of the Reorganization of the Machinery of Government (1949), Report on Public Administration (1951), and Public Administration India—Report of a Survey (1953) (Maheshwari, 2004). On account of these committees' report, the Planning Commission (1950) was set up to mobile the resources of the nation during the five-year plan. Furthermore, the Organization & Method [O & M] division was established in each department for the purpose of recruitment and training of the administrator (Mathur & Mathur, 2017). After that, reports like First Administrative Reform (ARC)-I in January 1966 were under limelight. The ACR-I advocated the requirement to safeguard the highest standards of efficiency and integrity in public service. It also took the

need to build public administration a fine apparatus to carry out the government policies, developmental program, and a responsive administration to the demand of the people interest (Tummala, 2002). In 1990, India witnessed a paradigm shift in neo-liberal economy and globalization. The reform in this phase is mainly centered toward decentralization and globalization. The economic reform of 1990 brought structural adjustment in the making and executing of policy in India. It tries to downsize the role of state and by increasing the role of market in delivering good and service to the public. On account of that, India faced the emergence of statutory independent regulatory agencies and problem of network governance. The issue of network governance and democratic decentralization has been central in the ARC-II, which is one of the highly accepted reforms since 1990. The main objective of this reformation is to “prepare a detailed blueprint for revamping the public administration system through bringing changes in the organizational structure of the Govt. of India” (Second Administrative Reform Commission, 2005).

India’s administration has largely failed to deal with the problems like regionalism, communalism, extremism, terrorism, and over-growing population.

6 CONCLUSION

According to the 7th Central Pay Commission report, there are 3,301,536 servants, who are top-level officers controlled by the central government. A country with such diversity of language, culture, religion, and custom, one and alone be controlled by the institution of the All India Service (AIS). Rise and fall of government, civil disorder, and political uncertainty at one side and to conduct free and fair elections on the other side are the golden achievement of the AIS (Shani, 2017). However, it has been observed that such great works are not being appreciated because of its failure to faithfully frame, execute, and evaluate policy. Usually, they created constraint in the implementation of the policy on the part of prevalent corruption and weak law enforcement. There are a number of evidences which showed that the civil servants are not effective in promoting economic development, reducing transaction cost, and providing effective public services. They are not specializing in policymaking and executing. Their quick transfer in the various organizations though makes them jack of all trade but special of none. No doubt that the civil servant had done well in preserving the overall constitution order since India got independence but have a very poor record in enforcing equal law at individual level (Kapur et al., 2018).

A proper and harmonious relationship is essential for the smooth functioning of the government machinery. The executive in the government machinery commands the full trust of the people and therefore, tries to fulfill their interest to the greater extent through making policy. However, the civil servants who frame and execute the policy get selected on the merit and have

to work subordinate to the political executive on the basis of principle of popular sovereignty. The relationship between the political executive and the civil servant is governed by “Neutrality” and “Anonymity” doctrine. Neutrality means that the civil servant should be non-political and should not serve any organization outside of the union or state government. Moreover, under anonymity’s norm, the civil servant should work behind the curtain of politics (Maheshwari, 1980). Usually, their relationship is functional only when the government is stable or minister having experiences (Nyadera & Islam, 2020). Otherwise, a recurrent rise and fall of political parties always stirs up their relation, which ultimately causes conflict (Gupta, 1987; Islam et al., 2020, 2021). Such conflict is permanent and appears time and again in the All India Services. Ramsay Muir in a statement said that majority of the time minister (executive) who is drawn from the legislature has no special knowledge of the field and complexity of the department. Once he/she proposed policy to the secretariat, then a civil servant most probably far senior to his/her put number of knotty problems with regard to the policy which could hardly be resist by his/her. In such condition only, a minister with exceptional grasp over the departmental complexity can handle the advice of the civil servant (Bhagwan et al., 2010). Therefore, a smooth relation between them is very crucial for administrating the policy in India.

With the great administrative history, India has different kind of experiences from political and administrative sector. The changes of administrative institutions in India are obvious, particularly from the post-independent time of Indian history; Indian administrative structures, functions, powers, styles, and cultures are dramatically and effectively changed. These changes make India the great powerful nation both inside and outside environment of international arena. After the independence, India faced the new administrative problems and situations but the effective attempt of democratic parliamentary system and the charismatic political leadership; Indians run their country smoothly and adapt the new administrative institutions, functions, powers, and positions accordingly with their constitution. The growing emergence of Indian economy and political leadership capacity proves that they have strong background to protect their administrative institutions. However, sometimes accountability crisis, black money problem, bureaucratic complexities, nepotism, political instability, and corruptions hamper the smooth works of Indian Administration. If India’s government wants to develop its administrative sector, much improvement is required in quality of governance and the corruption-free bureaucracy (Table 3).

Table 3 Main features of Indian public administration systems

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Administrative history	Geopolitical situation	Strategic
	Colonial history	Yes (1757–1947)
	Legacy of bureaucracy	Yes (Non-military)
	Centralized bureaucracy	Strong
	Role of military	No
	Political culture	conservative
	Administrative culture	A little participative
	Professionalism	High
	Politicization of bureaucracy	High
	Dominant state ideology	Secular
Legal structure	Nature of constitution	Written
	Origin of constitution	1950
	Strong constitution	Yes
	Constitutional rigidity	No
	Created by	Legislative
	Revised by bureaucracy	civil initiative / military /
	Government structure	Parliamentary
	Hierarchical structure	Strong
	Local extension agencies	too many
	Central government	strong
	Coordinating mechanisms	Existence of coordinating internal and external structure/agencies
		Weak
	Transparent financing system	Weak
	Monitoring	Not less weak
Independent regulatory agencies	Exist	
Local governments	Financial autonomy	Weak
	Political autonomy	Strong
	Council types	Council mayor
	Mayors	Elected
	Decision making bodies	Exist, Union, State, District, Local body
	Central tutelage/monitoring	Exist & strong
	Subsidiarity principle	Exist
	Decentralization type	Deconcentration, devolution- implemented to the greatest extent

(continued)

Table 3 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Intergovernmental relations	Logic for Division of tasks	Fair and rational / political
	Tutelage/monitoring	Weak
Public personnel system	Communication	moderate
	Civil services	Career based / Rank based / Prestigious
	Scope of civil services	% of civil services
	Recruitment and promotion	Competitive political not fair
	Nationwide exam	Exist
	Politicization in general	strong
CSOs/civil society	Unionization	Weak
	Size of Civil Society	NGO membership, volunteering
	Institutionalization	Weak
	Partnership with the state	Strong
	Political pressure/domination	strong
	Major financial revenues	donations, and fundraising activities
	Supportive national culture	Weak
	Political regime and civil society relations	Weak
	Civil society	Not so Prestigious
	Dominant reform paradigm	NPM reforms, Governance reforms
Reform philosophy	Policy transfer	Policy adaptation, policy adoption
	E-government reforms	not completed
	Artificial intelligence (AI) reforms	partial exist
	Influence of international actors	Strong
	New reforms (5 years)	Second Administrative Reform

Prepared by the Authors

Source Adapted and developed from Önder and Zengin (2022)

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Islamic Republic of Pakistan

Miskat Jahan and Md. Nazmul Islam

I INTRODUCTION

Pakistan, officially the Islamic Republic of Pakistan, one of the South Asian states, emerged as the first state on the world map which got independence on the basis of religious nationalism. In 1947, the state of Pakistan became free from the two hundred years emancipation of British rule through partition of India and comprised East and West Pakistan with the areas of southeast and west India, where majority people were Muslims. The two-nation theory of Muhammad Ali Jinnah, which indicates that “Muslims and Hindus are two separate nations by definition who have their own customs, religion, and tradition, and from social and moral points of view, was the basis of the creation of Pakistan.” In 1971, an unanticipated bloody war occurred between two parts of Pakistan. East Pakistan defeated West Pakistan and became present Bangladesh and West Pakistan take the name Pakistan as a separate state.

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Pakistan has been ruled by its military, either directly or indirectly, for over half of its existence since it emerged in its present form in 1971 (Milam, 2010).

However, “Pakistan is a democratic parliamentary federal republic, with Islam as the state religion” (The Constitution of Pakistan). Through experimenting different economic models, Pakistan has become one of the middle-income countries in the South Asia. Pakistan has its border called “Radcliffe Line” in eastern side with India while there is “Sino-Pak Border” with China in the northern part and Arabian Sea in the south side. In the western front, “Durand Line” has made the boundaries with Afghanistan and “Gold Smith Line” with Iran in the southern part (ebooksheir.org 2021). In spite of having same geography, in the recent time, Pakistan has become an important South Asian gateway for the fuel energy, economic corridor with China, and also for the declaration of worldwide war on terrorism. Recent conflict with border issues between China and India has increased the importance of Pakistan as a neighborhood country. To ensure stability and peace in South Asia, Pakistan would play significant role to reconcile the unrest (Islam, 2016, 2019, 2020; Islam & Cansu, 2020).

Pakistan has importance not only in the international affairs, but also in the study of comparative administrative science for its critical domestic administrative system. In more than seventy years of independence, Pakistanis voted for the third time in July 2018 to elect a civilian government rather than military one (Shah & Sareen, 2018). In this backdrop, this chapter would analyze the public administrative system of Pakistan as a case study to find out the specific strategies and mechanisms compared with other specific countries.

2 ADMINISTRATIVE HISTORY

2.1 *Early Administrative History of Pakistan (1947–1970)*

After the Second World War, British Imperial Government faced severe movement and non-cooperation from Indians and finally declared the independence of India and separation of Pakistan in 1947. As a center of colony, India inherited an administrative setting with skilled manpower while Pakistan had no infrastructural inheritance and no skilled human resource to run the newly separated state. Colonialism affected highly to establish the administrative system of Pakistan until finalizing new constitution. Pakistan separated as a new nation with two parts—East and West Pakistan, between of which there was a long distance of thousand miles of Indian territories. Since its emergence, various ethnic groups, i.e., Bengalis, Punjabis, Pashtuns, Sindhis, and Baluchis in Pakistan, were cemented based on religion (Islam, Bingöl and Nyadera, 2020; Islam et al., 2021; Islam & Hossain, 2020; Islam, Önder, & Nyadera, 2020; Musarrat & Azhar, 2012). Nevertheless, after independence, federalism was introduced as the state principle in Pakistan to ensure decentralization (Nuruzzaman, 2010). But since the emergence failure of democratization,

rent seeking political culture, and lack of institutionalization made Pakistan fragile (Khan, 2009).

Pakistan produced its first constitution in 1956 after nine years of its separation from India though the constitution was not passed in the face of protest in East Pakistan which was largest province in erstwhile Pakistan (Constitutional History of Pakistan, 2018). President of Pakistan General Muhammad Ayub Khan introduced Basic Democracy at the local level under Basic Democracy order 1959 to delegate power to the local-level elected representatives though all the members were not elected. Actually, this system was installed to secure his tenure of presidency in the name of democracy (Musarrat & Azhar, 2012). During the regime of Khan, there were repeated political violence and demonstrations by the political parties. As the next President General Yahya Khan suspended the Constitution of 1962, so non-parliamentary election was held on 1970, and the Awami League (AL) of East Pakistan won the majority seats in the National Assembly.

Despite political unrest, a strong unbiased administrative system played the role of main catalyst to sustain Pakistan as an independent nation during its early decade. Merit-based Pakistan Administration Service (PAS), popularly known as Civil Service of Pakistan (CSP) in later years, started its journey in 1947 with 94 former Indian Civil Servants (ICS). From the literature, it has been found out that civil servants had to pass strict exam and competition to join the PAS and the nationwide exam was conducted by an apolitical organization, Pakistan Public Service Commission (Khurshid, 2006). As per the Police Act of 1861, which Pakistan “inherited” provided that “to reorganize the police and to make it a more efficient instrument for the prevention and detection of crime.” In the early administration of Pakistan, Deputy Commissioner (DC) and District Magistrate (DM) had several quasi-legislative and quasi-judicial responsibilities (Imam & Dar, 2014). During that period, administrative system was impartial, apolitical, stable, secure, efficient, and organized (Khurshid, 2006). Then, DC was entitled to deal with land administration while DM was responsible to maintain law and order under the “Criminal Procedure Code” which has remained same in the latest administrative system. Within one decade of independence, democracy in Pakistan became unsound for revolved coup and assassinations. Intervention of Ayub Khan and politicization of civil service made the civil servants strongly demoralized.

United Pakistan began its existence with the seeds of discord between provinces and regions, and particularly between its East and West wings, sewn into its political fabric (Milam, 2010). East Pakistan was victim of the tyranny of West Pakistanis. In terms of participation to politics, economy and administration citizens of East Pakistan were deprived from equal treatment. West part of Pakistan became developed with the resources came from east part. On the other hand, there was no socio-economic development in the east part of the country (Kanwal et al., 2012). Even Pakistan Government wanted to make Urdu as the first language for the Bengali majority of which practiced Bangla

as their mother tongue. In the face of extreme protest and movement done by Bengali, erstwhile, Pakistan Government amended the Article 214 (1) of Constitution of Pakistan and declared Bengali as one of the official languages.

2.2 *Subsequent Administrative History of Pakistan (1971–Till Date)*

As a result of autocracy, deprivation, and political conflict, the liberation war started between East Pakistan and West Pakistan. After nine-month-long war, on December 16, 1971, army of West Pakistan surrendered and Bangladesh became independent.

The report “Pakistan (1947-present)” (2014), prepared by the department of Political Science of University of Central Arkansas, mentioned that in the face of repeated demonstrations, erstwhile President Yahya Khan resigned from his position and Zulfikar Ali Bhutto, as a civilian, became the President of Pakistan who lifted martial law later on 1972 (University of Central Arkansas, 2014).

After the separation, civil service of Pakistan became too much politicized by both of the civilian and military government. Provision of lateral entry, transfer based on lobbying, recruitment by lobbying, etc., made CSP more political than merit based. Meritocracy was compromised to recruit candidates with high political connection. Patron-client relationship dominates the civil servants to get appointment, promotion, and transfer. Bureaucratic performance was lowered by making the civil servants insecure through 1973 constitutional provisions, civil service ordinance, and civil service reforms. Civil Servants Act 1973 brought several significant changes in the civil service system in Pakistan. Central Services Pool (CSP) and Central Superior Services (CSS) became merged and service cadre was replaced by “District Management” and “Tribal Areas” occupational groups (Imam & Dar, 2013). Since then, government employees enjoyed “a unified pay scale ranging from Basic Pay Scale 1 through 22” (Kennedy & Qadir, 2003). Provision of reserving 10% posts vacant in the first class grade in civil service for the ex-military officers institutionalized the military entry in the civil bureaucracy which was totally unexpected. Quota system was strengthened and extended through the reforms of 1973 where regionalism and ethnicity got priority and women quota was introduced there in the following year in 2008. Flawed bureaucracy became subservient to the politicians and the civil servants became highly corrupted undermining their personal and professional integrity. Wilder (2009) argued that historically inherited strong civil service system of Pakistan has lost its glaze within the seven decades (Wilder, 2009). Pakistan adapted NPM-based reforms since 1990s to solve their economic crisis and to develop the performance of public sector, though expected results were not achieved (Iqbal, 2014). All the civil service reforms in Pakistan made the bureaucracy subordinate rubber stamp and vested the supreme power to the political parties as well as military. Post-separated Pakistan has been governed directly by its army for almost half of the thirty six years of its existence (Milam,

2010). However, running government has passed Civil Servant (Efficiency and Discipline) Rules, 2020, for bringing back the efficiency of civil service.

2.3 *Legal Structure of Pakistan*

Pakistan has a historical backdrop of colonial rule which has influenced the present legal structure of the state. During its independence, Pakistan followed “Government of India Act 1935” as the provisional constitution. Before finalizing Constitution of Pakistan, this act was adapted and modified with requirements of new Republic (Hussain, 2011). In case of judiciary, Pakistan retained similar judicial structure as India where the powers and jurisdictions of courts remained same. Though Pakistan was separated from India based on religious sentiment, the founder of Pakistan Mohammad Ali Jinnah had desire to make Pakistan a secular state. But as an Islamic state Pakistan required to introduce laws compatible with Islam, and in 1979, Federal Shariat Court was established by the government which is based on the principles of Islam on justice. Presently, Article 175 regulates the judicial system of Pakistan (Art 203 D of The Constitution of Pakistan). According to the constitutional provision, each province of Pakistan has Supreme Court and High Court while Islamabad as the capital has also a High Court (Ijaz, 2018).

In the federal republic, each province has extensive judicial power to exercise “original judicial power and appellate jurisdiction” where High Court has the prime authority and control over subordinate courts (Hussain, 2011). According to Article 203 of the Constitution, Civil Courts and Criminal Courts work under respective High Courts in the province. Article 175 (3) of the Constitution of Pakistan provides that “The Judiciary shall be separated progressively from the Executive.” Though constitutional provision said that “There shall be a Judicial Commission of Pakistan, hereinafter in this Article referred to as the Commission, for appointment of Judges of the Supreme Court, High Courts and the Federal Shariat Court,” but later on to strengthen parliamentary system 18th amendment was done including the provision of appointing judges by Judiciary Commission and Parliamentary Committee (Fig. 1).

Federal government can set up special courts, administrative courts, and tribunals at the federal level while provincial government is entitled to have their special courts or tribunals (Hussain, 2015). Pakistani judicial system is overburdened with cases and it has lack of sufficient human resources. Government should recruit more judges and judicial officers to solve the problem of backlog and ensure quick disposal of cases (Ijaz, 2018).

3 CENTRAL GOVERNMENT

Federal Government of Pakistan has three-tier administrative system comprising four provinces, two autonomous territories—“Gilgit-Baltistan and Azad Jammu and Kashmir”—and one federal territory—Islamabad Capital

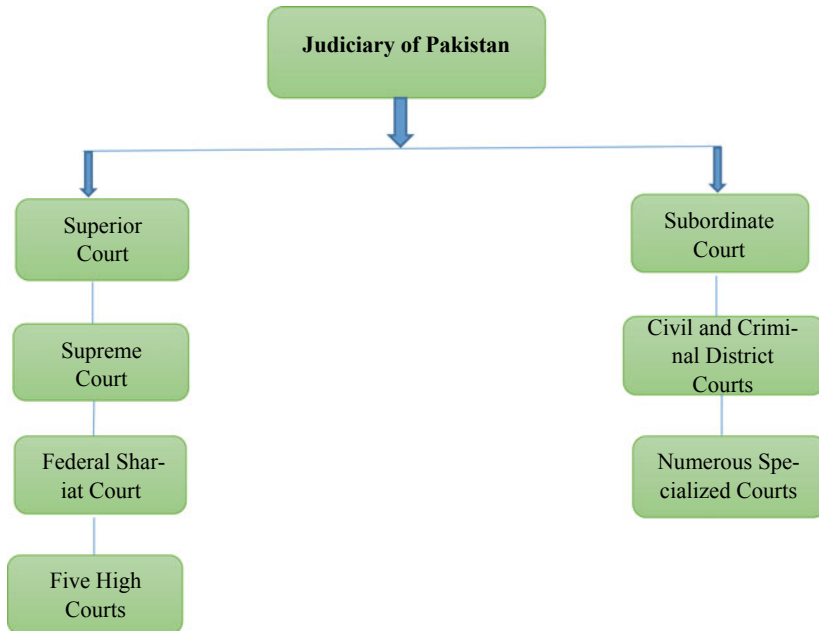


Fig. 1 Judiciary system of Pakistan (Source Hussain, 2015)

Territory. Besides, near the Afghanistan boarder, there is the Federally Administrative Tribal Area (FATA) which is constituted with seven agencies with different governance system (Commonwealth Local Government Forum). Pakistan has Westminster style of parliamentary system where the government is constituted with the three branches—executive, legislative, and judicial branches. Constitutionally, the Parliament, the Prime Minister, and the Supreme Court are entitled with all the powers while the President has the ceremonial status of head of the state. Constitutionally, the President has power to promulgate ordinances and to pass bills. On the other side, the Prime Minister, elected by people of the state and appointed by the members of the National Assembly, is the Chief Executive who runs the federal government (Commonwealth Local Government Forum). Federal Cabinet, comprised with ministers, ministers of state and advisers, assist the Prime Minister to oversee all the major affairs of the country (National Democratic foundation).

Parliamentary system of Pakistan is bicameral which is formed with National Assembly as a lower house and the Senate as an upper house. Federalism was entrenched in the foundation of Pakistan as the colonial heritage. During the independence, it was declared by the founder Mohammad Ali Jinnah that “certain vital powers will remain vested in the Central Government such as monetary system, national defense and federal responsibilities.” Federalism was retained by all the three constitutions of Pakistan (1956, 1962, and 1973) as the state principle to ensure nationalism, belongingness, and social harmony

among all the constituencies (Nazir, 2008). But matter of distress is that after seventy years of independence Pakistan could not transfer full autonomy to the local government. Federal system has been remained highly centralized till now in Pakistan which is recognized as the colonial inheritance.

Though several regimes have taken different reform initiatives to transfer the power and authority from central government to the local government, but almost all the reforms failed to make the local government empowered and independent. Interestingly, devolution plan to transfer power to local government was implemented in 2000 with the provision of no decentralization of any federal powers to either the provincial or local levels (Cheema et. al., 2005). In the regime of General Musharraf, the Local Government Ordinance (LGO), 2001, was passed which gave constitutional cover to local governments and introduced the provision of reserve seats for women and backward groups (Ali, 2018). Despite passing the ordinance, hierarchy was not followed to distribute the responsibilities in each tier while significant power was accumulated in the hand of central government (Taj & Baker, 2018). After independence till date, 18 civilian prime ministers have taken oath in Pakistan, but each and every government wanted to protect their own chair instead of making federalism in Pakistan successful transferring power and authority to the local government.

4 LOCAL GOVERNMENTS

Local government has very important role to accelerate development of any country through ensuring demand-based service delivery. Federalism as the state principle has been adopted in Pakistan to make the local government autonomous and empowered. Constitution of Islamic Republic of Pakistan has the provision about the formation of local government. Article 32 and Article 140A have defined the mode of local government system and the way to form it. General Musharraf's regime introduced Local Government Ordinance in 2000 which institutionalized three-tier local government in Pakistan. Local government has both urban and rural level tiers in Pakistan. The Local Government in Pakistan has three-tier system of district (zila), tehsil, and union councils with federal structure. Every tier has defined functions to work on agriculture, education, health, and community-based services (The Local Government System in Pakistan, 2018).

District government, in the urban level which is named as City District Government, is formed with Zila Nazim and District Administration. The District Administration is comprised of district offices including sub-offices at tehsil level of the Provincial Government departments which are responsible to Zila Nazim as the executive head of the district. Zila Nazim is entitled with the responsibilities to implement government strategies and development agenda (Anjum, 2001).

As the middle tier of local government system, Tehsil is headed by Tehsil Nazim and tehsil Naib-Nazim assists him/her. Every tehsil has a Tehsil Municipal Administration, which is constituted with a Tehsil council, Tehsil Nazim, tehsil/taluka municipal officer (TMO), Chief Officer, and other officials of local council. According to the Local Government Ordinance, 2001, Tehsil Municipal Administration is responsible for supervising all the affairs of Local Government and Rural Development and to do all the tasks related to public health, housing, planning, etc., of the tehsil area (Anjum, 2001). Union council, the last tier of local government, is formed with a collection of villages where a village with approximate 404.68 hectares is the smallest unit of rural local governance (Malik & Rana, 2019). Union council consists of Union Nazim, Naib Union Nazim, and three Union Secretaries and office assistant if necessary. The Union Nazim and the Naib Union Nazim are directly elected by the adult franchise among which the Union Nazim is the head of Union Administration and the Naib Union Nazim becomes the head during the temporary absence of the Union Nazim. The Union Secretaries facilitate the community development, coordinate the functioning of the Union Committees, and ensure municipal service delivery under the supervision of Union Nazim (Anjum, 2001). Mayor and deputy mayor of the Tehsil/ Town Councils are elected by the elected members of union councils (Haider & Badami, 2010) (Fig. 2).

After independence, several military coup occurred in Pakistan which made the democratic governance more vulnerable. During independence, Pakistan had no active local government system except in Punjab. Political leaders and military administrators took the opportunity to centralize all the powers. Military-led government general Ayub Khan and general Zia-ul-Haq wanted to revive local government system for their own interest. No fruitful initiatives were taken before 2000 to decentralize the power and authority from the federal government to the provincial and local government.

The absence of active local government system made the sub-national government too much dependent on the central government. Citizens' demands were not heard in case of any project implementation. Demand-based service delivery was not available in the local level and the marginalized community members were excluded from the development activities. The LGO 2001 created Citizens Community Boards (CCBs) as one of the social accountability mechanisms through which community members become empowered and citizens can voluntarily participate in the social service delivery (Ali, 2018).

Own source revenue was very low in the local level previously. Fund allocation and distribution of resources were not equal irrespective of location. Too much concentration of power in the center made absence of people's participation in the decision making, lack of accountability, transparency, checks and balance and unresponsiveness to the citizen's demands. After passing LGO 2001, a transparent, formula-based system determines fund transfer to local

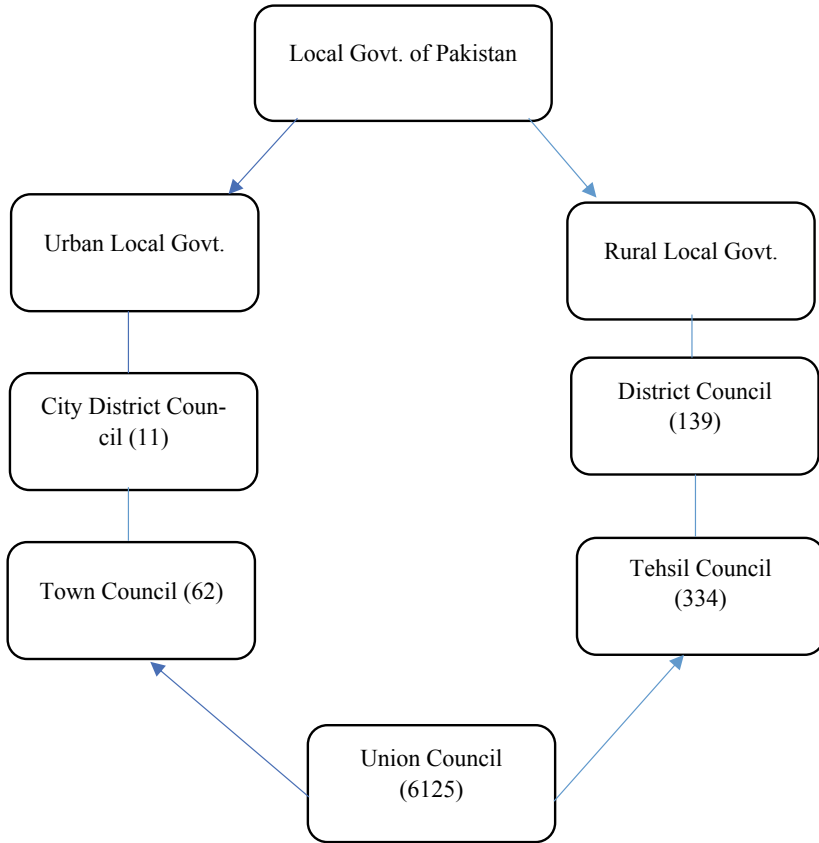


Fig. 2 Local government system of Pakistan (*Source* Haider & Badami, 2010)

governments from fiscal year 2002–2003. According to LGO 2001, a Provincial Finance Commission (PFC) has been established in each province. This Finance Commission assesses the local financial requirements though consultation with the Provincial Government is responsible to ensure regular fiscal transfer based on requirement (Anjum, 2001).

4.1 *Central-Local Government Relations*

Pakistan has inherited federalism from the colonial legacy of British rule. British ruler settled federalism up to convince erstwhile Indian political leaders and to keep the provinces under control in the name of decentralization. But Pakistan followed federalism to ensure decentralization through giving autonomy to the provinces. Founder of Pakistan, Muhammad Ali Jinnah, enhanced his views on federalism and explained: “the theory of Pakistan guarantees that federal units of the National Government would have all

the autonomy that you will find in the constitution of the United States of America, Canada, and Australia” (Nazir, 2008). Though foundation of Pakistan adopted federalism to establish decentralization, there was no active local government body after long time of the independence. Despite retaining federalism in its constitutional history, it was not possible for Pakistan to establish the federal model after seventy years of the independence. Central-local relationship in Pakistan is discussed below:

4.2 *Financial Dependency*

Both military and civilian government concentrated power in the central body and made the local government completely dependent. Central government holds all the power to identify, approve, and implement the development projects in the local level where requirements of the local citizens were not assessed. For the lack of accountability and transparency, development projects and infrastructures are not well maintained which only spent billions of rupees without utilization (Anjum, 2001). Local government is still in a transitional phase, which has resource constrains and no capacity to formulate and implement any policies and to manage basic necessities (Cheema et al., 2005). Alavi noted that in Pakistan bureaucracy as an unrepresentative institute is more interested to achieve the interests of the central government rather than decentralizing the governance system (Alavi, 1972). For the lack of financial capacity, local government of Pakistan cannot enjoy autonomous status and the equal distribution of resources. Though LGO 2001 has been passed about twenty years ago, still local government bodies are not capable to generate sufficient own source revenue. There was no provision about the direction for the local government to increase their revenue collection. Local government has lack of capacity which is interlinked with lack of revenue collection. When local government bodies will be capable to raise their own revenue, then they will be able to address the needs of their constituencies (Ali, 2018).

4.3 *Concentration of Power and Authority*

Consecutive military rule in Pakistan has made democratization weak and fragile. All the military rulers concentrated state power and authority in the center. During the evolvement, there was no active local government body in Pakistan and military regime was not interested to activate the system. However, through the introduction of basic democracy in 1958 General Ayub Khan established local government system for the first time in Pakistan to legitimize his Presidential Constitution and to transfer power to military (Cheema et al., 2005). Though civilian government was in power for several years in Pakistan, they did not revive the local government system in real sense. LGO was passed in 2001 by General Musharraf’s government with intention to transfer power and authority to the local government. But non-party basis election made the initiative questionable and power and authority remain

consolidated in the central and provincial government. Actually, “collaborative politicians” made the local government a localized patronage structure which supported the non-elected military regimes (Malik & Rana, 2019). Present government dissolved the existing local government system and introduced new system through passing Local Government Act 2019. But stipulated provisions of the supervisory role of provincial government and introduction of the Inspectorate of local governments in local government system have not actually devolved the power and authority to the local government. In a sense, the spirit of devolution has been undermined through making provincial government superior and the local government subordinate to this superior not only in policy but also in implementation (Malik & Rana, 2019).

4.4 *Resistance by Bureaucracy and Politicians*

Politics of Pakistan have made the bureaucratic institutions stronger than the democratic institutions within the six decades of its separation from India (Wilder, 2009). Bureaucrats could establish decentralization through ensuring devolution of power and authority at the local government level (Nyadera & Islam, 2020). But regrettably consecutive military regimes, political instability, etc., made the Pakistani bureaucracy rubber stamp, where patron clientelism has become the part of administrative culture (Onder & Nyadera, 2020). For preserving their own interest, bureaucrats did not make the local government system decentralized. It is thought that not only the political instability but also bureaucratic elites have pivotal role to perpetuate centralized administration, which is a major hindrance behind the weak democratic institutions. Instead of making decentralized administrative system, bureaucrats were impatient to maximize their own interest. Still, bureaucracy is keeping power in their hand through not devolving the power and authority to the local government. Bureaucrats believe still today that that “things are better when development is left in the domain of the bureaucracy rather than being made subordinate to elected local governments” (Ali, 2018). As a result, local government in Pakistan has remained unchanged and unresponsive to the local demands denying the predominating objectives of establishing local government.

4.5 *Absence of Unique Local Governance Mechanism*

Pakistan has four provinces—Balochistan, Punjab, Sindh, and Khyber Pakhtunkhwa; two autonomous territories—Gilgit-Baltistan and Azad Jammu and Kashmir; and one federal territory—Islamabad Capital Territory. Any unique governance mechanism is not followed in all the provinces. For example, Punjab is following the Local Government Act of 2019 while other provinces have not accepted the new law yet (Malik & Rana, 2019). Local government loses the importance and becomes scattered for the lack of any concentrated mechanism. As a result, local citizens cannot raise their voice

to get demand-based services, and in many cases, local government has been silenced by the military regimes or military-backed civilian government.

4.6 *Lack of Coordination*

As the local government system in Pakistan does not follow any single mechanism in all the provinces, so lack of coordination is prevailing there. Delegation of functions is different in the provinces while different rules are followed in different provinces. In many cases, there is no deliberative space and forum to take citizens' demands in account. Through better coordination, central government and the provincial government would ensure equal distribution of the resources in the local level which would make the overall development accelerated. Actually, the central government is unwilling to devolve the autonomy to the provinces and the provincial government does not want to empower the local bodies as well. Lack of coordination among federal government, provincial government, and the local government has made the decentralization process more sluggish and complicated.

5 PUBLIC PERSONNEL SYSTEM IN PAKISTAN

Generally, public personnel system is to manage the pool of government employees who serve the citizens of a state and are appointed, trained, and promoted by the government. According to Flippo, "Personnel management is the planning, organizing, compensation, integration, and maintenance of people for the purpose of contributing to organizational, individual and societal goals" (Keerthi, n.d.). Pakistan inherited a robust public personnel system from British India, formed by erstwhile British rules. During its independence, Pakistan adopted the steel frame of the British Administrative system with minor adjustments (Kennedy & Qadir, 2003). After the independence, Muslim majority officers of the Indian Civil Service (ICS) joined to Pakistan Administrative Service (PAS), currently known as Civil Service of Pakistan (CSP), with the determination to form newly independent Pakistan. The small number of civil servants made it possible to build Pakistan strongly in spite of having barriers (Ahmad, 1970). But since 1973 when CSP was interrupted and various services joined into one administrative system, then the expertise of CSP lost. Within the several years, too much political intrusion, nepotism, unavailability of suitable candidates, militarization, corruption, etc., made CSP questionable. Consecutive military regimes made the civil service system subservient to them and created insecurity for the civil servants. Though there were many reform efforts to make the public sector more effective, responsive, and efficient, still the citizens, civil societies, and the international development communities consider the public sector of Pakistan cumbersome, corrupt, and inefficient (Iqbal, 2014).

Present government has introduced several civil service rules such as "Civil Servants Promotion Rules, 2019; Civil Servants (Directory Retirement from

Service) Rules, 2020; Efficiency and Discipline Rules, 2020; Revised MP Scale Policy, 2020; Rotation Policy, 2020” (Alam, 2015).

Presently, there are 14 groups and services in CSP. The Central Superior Service of Pakistan is a group of departments which include 10 prestigious and powerful departments. To ensure merit-based entry, every year competitive exams in Pakistan are conducted by Federal Public Service Commission to recruit successful candidate to various departments of the civil service. Age limit for the candidates has been fixed from 21 to 30 years to apply for CSS Exam. Civil servants take mandatory combined training at Civil Services Academy, Lahore, according to the reform of 1973. Promotions in the bureaucracy are based on a combination of seniority and merit. Since 2016, Key Performance Indicator (KPI) has been installed to determine promotions of civil servants. Government of Pakistan follows the Basic Pay Scale (BPS) 2017 which is eligible for all of the government employees (Finance Division, Government of Pakistan, 2017).

Since the independence, each and every government in Pakistan has formed different administrative reform committees to make the civil service more responsive, efficient, and effective. But recommendations of the reform committees have not been implemented in real sense. Wilder (2009) argued that historically inherited strong civil service system of Pakistan has lost its glaze within the seven decades (Wilder, 2009). Political willingness and bureaucratic commitment can make the federal government autonomous and the local government system self-governed as well as autonomous.

6 NGOs

After the independence, many NGOs worked on rehabilitation, health, and education of the general citizens. Next in the late 1970s erstwhile Martial Law Administrator emphasized on social work and welfare, which accelerated the NGO activities. Since the independence with the emphasis of donors to involve NGOs in the development process to ensure justified distribution of resources, government created rural support organizations (Rahman, 2005). Influence of NGO sector in the socio-economic development of Pakistan is very low. The conclusion from the available research is that NGOs are relatively weak and far less influential in Pakistan (Milam, 2010). Many civil society and volunteer citizen organizations work in Pakistan as the alternative sector with human rights, women empowerment, trade unions, and other social problems. After 1990s, majority of the NGOs become engaged in the field of advocacy and development. Presently, a large number of NGOs work with different development agenda such as poverty alleviation, improving quality of care, and reforming education sector.

According to the findings, though Pakistan has six major NGO registering acts, most of the NGOs in Pakistan do not have registration (Zulfiqar, 2012). In the recent years, the number and resource of NGOs have increased

rapidly. According to a certification organization, Pakistan Centre for Philanthropy (PCP), more than one lac fifty thousand NGOs are working now in Pakistan. Actually, there has no accurate number of NGOs and the government has not accurate data about the size of the non-profit sector (Shah, 2016). Several catastrophic disasters such as earthquake and flood in the twenty-first century have made Pakistan vulnerable which got attention of the international community. Political instability and economic slow rise also made Pakistan backward than other countries in the South Asia. Barriers to development such as political unrest, insolvency, and environmental vulnerabilities all have made Pakistan to get foreign aid and to involve the NGOs more in the nation-building activities. During the mid-nineties, Pakistan saw a flourish of NGOs with direct foreign donation and the sharp rise in activities of religious groups through Madrasas. Screening process of NGOs was started in early December 1998. As a result, more than 2000 NGOs were banned and their registrations were canceled (Rahman, 2005). In addition, owners of NGOs were highly political connected which make the relationship between government and NGOs questionable.

Currently, in Pakistan, NGOs are playing important role to ensure development through different programs such as micro-credit program, poverty alleviation program, and engaging rural community members in decision making process. Besides, NGOs are also working with different issues such as environment, advocacy, social awareness building, and economic development (Önder, 2006, 2011). For lack of capacity and sufficient government support, NGOs cannot have extensive role in the national development of Pakistan. Though growth of NGOs in terms of number and outreach is good, for the lack of sufficient budget allocation, institutional weakness, and the governments' skepticism, NGOs cannot maximize their potentials (Rahman, 2005).

7 RECENT DEVELOPMENTS IN PUBLIC ADMINISTRATION

In spite of inheriting strong civil service, too much political influence, corruption, patron-client relationship, consecutive military regimes, etc., have made Pakistani bureaucracy weak, dependent, and change aversive. Though many reform initiatives were recommended by different reform commissions in different regimes, recommendations have not been followed fully to reform the public administration system in Pakistan (Table 1).

However, to ensure demand-based service delivery and for making citizen centric government, several reforms have been taken during post-independence era in Pakistan. Structural Adjustment Program was installed in Pakistan during 1990s to reform the public sector with the assistance of international development partners.

Through this program, Pakistan initiated to do major structural reforms, which included the taxation, trading, privatization, reforms in financial sector, human resource development, and social safety net (Iqbal, 2014). For the

Table 1 Summary of civil service reforms under different regimes

<i>Head of the state</i>	<i>Tenure reform initiative</i>
General Ayub Khan (1960s)	Cornelius Pay Services and Reform Commission 1962, but preceded by removal of civil servants
General Yahya Khan (1969-1970s)	Professionalizing and rationalizing the British Civil Service
Zulfiqar Ali Bhutto (1970s)	Administrative Reforms Committee constituted in 1973, recommended to reform the CSP through superseding reserve seats for civil servants in the Federal and Provincial Government, replacing CSP cadre with District Management Group (DMG), introducing national pay scales, setting a uniform service structure of the occupational; groups This commission also urged to remove constitutional pledges for the civil servants
General Zia-ul-Haq (1970s and 1980s)	In 1978 Zia government formed Civil Services Commission which emphasized to implement the recommendations of the Reforms Committee of 1973
Nawaz Sharif /Benazir Bhutto (1990s)	In 1990s a number of reform committees were established
General Pervez Musharraf (2000s)	Musharraf government revoked Executive Magistracy and introduced Police Order (2002). National Commission for Government Reforms was established in this regime
Imran Ahmed Khan Niazi (2018 to till date)	Present government has installed a number of new rules such as “Civil Servants Promotion (BS-18 to BS-21) Rules, 2019 Civil Servants (Directory Retirement from Service) Rules, 2020 Efficiency and Discipline Rules, 2020 Revised MP Scale Policy, 2020 Rotation Policy, 2020”

Source Alam (2015)

lack of proper institutionalization, SAP program could not brought desired change in Pakistan. In the following years, Pakistan Government took various initiatives to improve civil service and to expedite public service delivery.

Like other developing countries in South Asia, New Public Management as one of the paradigms (Ayhan & Önder, 2017) has been introduced in Pakistan to make the public institutions more effective, efficient, and profitable. Though NPM was adapted for the welfare of the country, it was not suitable in the socio-economic context of Pakistan (Khan & Hussain, 2020).

Federal Government of Pakistan introduced reform programs based on NPM model from 2000, to modernize its public sector on scientific patterns and to enhance the economy and accelerate growth and poverty reduction (Iqbal, 2014). Pakistan has adopted “Vision 2030” to delineate the state’s role to be developed one within 2030. IT Policy and Action Plan 2000 was taken in Pakistan as an important tool of sustainable development. “E-Government Strategy Five Year Plan” was accepted by the National E-Government Council (NEGC) in 2005 to introduce e-governance in the public sector (Ilyas, 2016) (Fig. 3).

Electronic Government Directorate (EGD) has been formed under the Ministry of Science and Technology later on to accelerate e-governance in Pakistan. Recently, many service sectors have been digitized. For instance, technology is used to keep land revenue record, to observe disease closely, to monitor service delivery, etc. (Muhula, 2019). Recently, Pakistan Telecommunication Authority has installed the “Smart Pakistan Initiative” for the future development in ICT sector (Ullah et al., 2021). Recently, several steps have been taken by the Government of Pakistan to digitize health service system, transactions, payments, and the grievance redress system. Spread of global pandemic Covid-19 has increased the online services in Pakistan such as tele-medicine help line, tele-school, and WhatsApp helpline. In 2018, Government of Pakistan established “The Pakistan Citizen’s Portal” so that citizens can use digital platform to complain for the grievance redressed (Ullah et al., 2021). Though Pakistan Government has formed National E-Government Council a long ago, all the services are not digitized yet. “E-Governance for Good

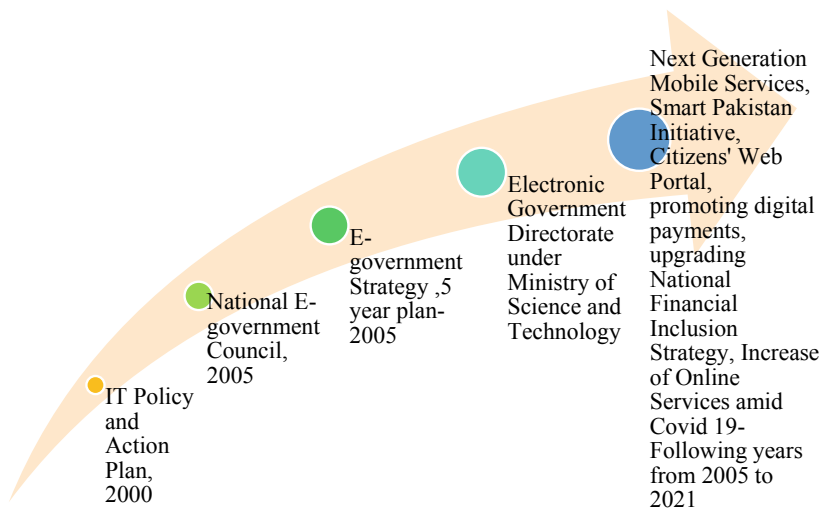


Fig. 3 Development of E-governance in Pakistan

Governance” slogan was taken by Pakistan in 2014 but still the process of e-governance is not complete.

8 CONCLUSION

In spite of having a legacy of tyranny Pakistan emerged as a hope for the majority Muslims, lived in the Indian Subcontinent. It inherited a strong administrative system which actually made the base of this country to sustain as a new nation. But consecutive military regimes, too much political intrusion into the administration, incoordination among central federal and local government, nepotism, corruption, and overall patron-client relation, have made the administrative system as “rubber stamp.” Besides, frequent military coup and religious extremism exposed Pakistan as a fragile state. Democratic practice should be ensured to make development continuous. However, Pakistan cherishes the dream to be one of the developed countries in the world within 2047 during its hundred years of independence. World Bank has suggested three pathway for Pakistan to get high-income-country status. “The first is a revamping of the public administration system to make it more effective and efficient, the second is deepening devolution to strengthen administrative and fiscal structures that support devolved functions, and the third is reassessing how the state can function to support the market and improve service delivery” (Muhula, 2019).

As a federal state, it is urgent to keep coordination between federal government and provincial government. Devolution of power should have to be ensured to make the local government responsive to the citizens’ demands and local problems. Civil service should be strictly managed through ensuring merit-based recruitment, uninterrupted promotion, and transfer of the government officials. Performance appraisal system should be followed regularly to promote the suitable officials. All the reform initiatives taken by present government to reform the civil service system should be implemented properly. Democratic principles should be followed properly for the socio-economic development. Political intrusion into the public affairs should be **minimized** to make the executive independent. New civil service reform should be initiated to make the civil service system out of colonial legacy. Private sectors and NGOs should be given enough space to work independently for the welfare of state. Demographic dividend and management of natural resources may help Pakistan to fulfill the “Vision 2030” and the SDGs (Table 2).

Table 2 Main features of the public administration systems

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Administrative history	Geopolitical situation	Strategic
	Colonial history	Yes (1757–1947)
	Legacy of bureaucracy	Yes (military)
	Centralized bureaucracy	Strong
	Role of military	Military dominant
	Political culture	Conservative
	Administrative culture	Not participative
	Professionalism	Low
	Politicization of bureaucracy	High
	Dominant state ideology	Religious
Legal structure	Nature of constitution	Written
	Origin of constitution	1956, 1962, 1973
	Strong constitution	Yes
	Constitutional rigidity	Yes
	Created by	Military
	Revised by bureaucracy	Civil initiative / military /
	Administrative judiciary system	Strong
Central government	State structure	Federal
	Government structure	Parliamentary
	Hierarchical structure	Strong
	Local extension agencies	Too many
	Central government	Yes & strong
	Coordinating mechanisms	Existence of coordinating internal and external structure/agencies
		Weak
	Transparent financing system	Weak
	Monitoring	Weak
	Independent regulatory agencies	Not exist
Local governments	Financial autonomy	Weak
	Political autonomy	Weak
	Council types	Council mayor- Nazim
	Mayors	Elected
	Decision making bodies	Exist, City District Council, Town Council, District Council, Tehsil Council, Union Council
	Central tutelage/monitoring	Exist & strong

(continued)

Table 2 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Intergovernmental relations	Subsidiarity principle	Exist
	Decentralization type	Deconcentration, devolution- but not implemented properly
	Logic for Division of tasks	Fair and rational /political
Public personnel system	Tutelage/monitoring	Weak
	Communication	Moderate
	Civil services	Career based/Position based/ mixed but X dominated Prestigious
	Scope of civil services	%of civil services
CSOs/civil society	Recruitment and promotion	Competitive political not fair
	Nationwide exam	Exist
	Politicization in general	Strong
	Unionization	Weak
	Size of Civil Society	NGO membership, volunteering
	Institutionalization	Weak
	Partnership with the state	Weak
	Political pressure/domination	Strong
	Major financial revenues	Donations, and fundraising activities,
	Supportive national culture	Weak
Reform philosophy	Political regime and civil society relations	Weak
	Civil society	Not so Prestigious
	Dominant reform paradigm	NPM reforms, Governance reforms
	Policy Transfer	Policy adaptation, policy adoption
	E-government reforms	Not completed
	Artificial intelligence (AI) reforms	Partial exist
	Influence of international actors	Strong
New reforms (5 years)	Civil service reforms, local govt. reforms, e-governance, NPM	

Source Adapted and developed from Önder and Zengin (2022)

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Russian Federation

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I INTRODUCTION

The Russian Federation is a federal state located in Eastern Europe and Northern Asia and the largest country in the world with total territory of 17,075,200 km (6,592,735 square miles) (Nations Encyclopedia, 2021). Population of the country (lastly updated on 01.01.2021) is 146,171 thousand people (Federal State Statistics Service, 2021). Russia shares borders with 18 countries. In terms of population, it holds the ninth place in the world and has the sixth largest GDP. It stretches across eleven time zones and its average climate is colder than in any other country on Earth. Russia's land is extremely rich and varied, with plains and bogs, forests and rivers, mountains and lakes essential for world environment. With regard to mineral resources, there is a lot of precious metals, iron, bauxites, coal, oil, and natural gas. Today's Russian Federation is considered to be an heir to Russian Empire and the USSR, one of the twentieth century's world two superpowers. Despite losing its superpower status the Russian Federation is still self-sufficient sociopolitical and economic unit of the modern world and has an important geopolitical position

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that allows it to play a binding role among important financial and economic regions of the modern world, the Atlantic, the Pacific, and the Indian Ocean regions (Necefoğlu, 2017: 2). The official language is Russian, but over one hundred and thirty languages are spoken throughout the population.

Capital:	Moscow
Language:	Russian
Area:	17,125,187 km ²
Population:	146,171 thousand people (2021)
Currency:	Russian Ruble
Continent:	Europe, Asia
President:	Vladimir Putin
Prime Minister:	<i>Mikhail V. Mishustin (Since 2020)</i>
State regulation:	Federation
Political system:	Presidential
Executive power:	Prime Minister
Legislature:	Federal Assembly of Russia
Judiciary:	Independent from legislature & executive
Constitution:	Adopted December 12th, 1993
Administrative division:	<i>85 Federal Subjects (regions)</i>

Russia is one of key power figures on the international political arena today. Dominant and important role of this country has dated back through history to the period when Slavs began populating Eastern Europe in the first millennium AD, going forward via continuous development of Russian principalities and tsardom, to culminating in an expansion of Russian Empire in the eighteenth and nineteenth centuries, the creation of the Soviet Union, its further disintegration, and eventual formation of the Russian Federation in 1991.

Modern Russia inherited much of administrative and bureaucratic culture from Soviet Union. Soviet state institutions started degrading in late 1980s under general secretary (and later president of the USSR) Mikhail Gorbachev launched his five-year reconstruction program called *perestroika*. Perestroika included reforms summarized in three principles: “Glasnost,” “Democratizatsia,” and “Novoe Myshlenie.”

Glasnost, or “openness,” was referring to abolition of censorship, creating a freer information flow, and establishing genuine public debates. *Demokratizatsia*, or “democratization,” was a reform that had to open Russian political system, increase transparency and public accountability, and introduce regular elections with candidates from multiple parties. *Novoe myshlenie*, or “new thinking,” meant a new approach to foreign affairs aimed at building up peaceful relations with the West and put the end to Cold War.

With these reforms, Gorbachev sought to renovate Soviet system to save it under less advantageous than before economic and social conditions. On December 26, 1991, the USSR was dissolved which marks a dawn of a new era in long history of the Russian state when the Russian Federation (proclaimed

its independence earlier on June 12, 1990) gained unchallenged sovereignty over its territory.

First a few years after the collapse of the Soviet Union were hard in every sense possible—politically, economically, and socially. Newly elected Russian President, Boris Yeltsin, was a construction engineer by training, and long served as a Communist Party bureaucrat. Thanks to his charisma and dedication he managed to become a leader of democratic surge in the country, to suppress Communist Party's resistance, to break Soviet administrative system, and establish new institutions on the basis of new Constitution adopted in 1993. Early the 1990s in Russia featured radical economic reforms meant to transfer lagging and military-orientated state-run economy to free market. Outcomes of the economic shock caused by galloping inflation, mass unemployment, and shrinking income were vanquished only by 2000s coincided with an increase in oil prices.

By 2000, Yeltsin had had a few strokes so he hardly could lead the country any further. That is why, in view of upcoming presidential election, he resigned right on December 31, 1999, to appoint then Prime Minister Vladimir Putin temporarily acting President to give a new leader some time to demonstrate his skills and promote his candidacy for the elections. Since then, it can be said, Russia has left behind democratic path to steadily reinstate authoritarian institutions of political power. Under the new presidency of Vladimir Putin, Russia managed to fully recover from economic crisis of 1990s (although modest recovery began back in 1999) and later began to show its diplomatic and military strength in the region and globally. In this chapter, development and progress of the Russian Federation during the last two decades will be rendered with a special focus on the structure of central and local government, public personnel system, non-governmental organizations, and recent developments in the area of public administration.

2 ADMINISTRATIVE HISTORY

To better understand Russia's administrative structure, we should briefly examine its history from the Soviet time until now. After the disintegration of the Soviet Union in December 1991, the country underwent a transition process to transform its administration and state regulation from unitary to federative system. On December 12, 1993, the new constitution was adopted, and completely changed the former Soviet government system (Al Jazeera, 2012). The distribution of power among central, regional, and local governments continues to improve steadily. However, the very institution of separation of power in Russia has been an important step toward democracy.

2.1 *Roots and Development of Administrative Tradition*

Notwithstanding a well-established administrative tradition of Muscovy, modern Russia's state institutions and bureaucracy are rather traced back to the

eighteenth century's westernization. Tsar Peter initiated enormous economic, cultural, and administrative reforms which stunned the foundations of traditional medieval Russia to turn in into a major player in European politics just in twenty years. Peter proclaimed Russia as an Empire, established Imperial Senate as the main executive body, Collegiums (predecessors for ministries), a unified system of civil service titles (so-called Tabel O Rangah), regular recruitment-based military, and even replaced Orthodox Church Patriarchy with Holy Synod, which made the Church part of state system. Russia was divided into eight territorial units with a governor (as a public servant and a military commander) on head—this was one of the first steps to creating an extensive bureaucratic system of regional and local government (Liebert et al., 2013: 24).

Russian Empire was one of the leading states in the world until World War I, exhaustion from which led to two consecutive revolutions in 1917. The first in February abolished the monarchy while the second in October made Russia a totalitarian state under Bolshevik, or later Communist, party. Formally, Communist Russia was “a free union of nations and nationalities” adopting a new federal system of regional self-government, but in fact, it rather restored imperial autocracy under auspices of Marxist ideology. New elite of totalitarian society and new ruling class were in hands of Communist bureaucracy, which often referred to by scholars as *nomenklatura*.

As opposed to capitalist countries, in the Soviet Union under Communist rule private property was completely banned which made market economy mechanisms impossible to function (there always was black market, however). Instead, Communist Russia was the biggest in history regulated state-run economy that required enormous administrative efforts to arrange all the details in every specific workflow within a framework of centralized bureaucracy. Indeed, it must be admitted that this ambitious administrative project failed as it simply could not regulate production and consumption processes, calculate, control, and plan everything needed in long term. Nonetheless, the tools and practices that let the Soviet Union compete with the West are certainly worth considering. It was an over-centralized state with totalitarian political regime attempting to control every sphere of social life as well as the private lives of citizens. Federal division of the USSR was rather a fiction while, in fact, all regional authorities directly reported to Moscow at all times. The only political force in the country in that period was the Communist Party—an autocratic organization formally separate from the state institutions but actually substituting them in many cases. All government officials must be members of the party and follow its rulings. Executive and legislative powers were in hands of Soviets which were obedient to the decisions made by Communist Party committees as Soviet members at the same time were party members. Supreme legislative power belonged to All-union Council of People's Delegates which members were usually elected without alternative (literally with only one name on the ballot) and which function was just to approve the decisions already made by the Communist Party. Soviet

constitution's wording (of all three of them) was as humane, democratic, and encouraging for civil rights as far it was from Soviet reality. In fact, Soviet Russia was an unfree state which administrative tradition had nothing to do with what its constitution declared or even with formal government structure; it relied upon single party administrative tools, coercion, and violence that is far from more efficient modern instruments of public administration.

On June 12, 1990, the Council of Public Representatives accepted Russia's declaration of state sovereignty and admitted superiority of Russian legislation over Soviet Union's one. On March 17, 1991, Gorbachev (who was the general secretary of the Communist Party of the Soviet Union from 1985 to 1991, and the president of the Soviet Union in 1990–1991) initiated a referendum on Soviet Union's continuation that confirmed vast majority of people's willingness to keep the current Soviet system. But after some tragic political turmoil, on December 8, 1991, the Belovejsk Agreement on USSR disintegration was signed by the governments of Russia, Ukraine, and Belarus, so that eventually forced Gorbachev to resign from his office of USSR president on December 26, 1991.

After the demolition of the Soviet Union, Russia's administrative system in new environment was slowly transforming into a federal democratic state. According to the Constitution adopted in 1993, Russia is defined as a federation with presidential political system, where president is a head of state and a guarantor of constitution, and the cabinet of ministers ("pravitelstvo") is responsible for executive power, a prime minister reporting both to the president and to the parliament.

Period of the 1990s was critical for all post-Communist countries that had to do political, economic, and social transformations simultaneously. With the leadership of Vladimir Putin in 2000s Russia started distancing from democratic principles re-adopting tradition of authoritarianism. Many traits of the Soviet state have resurrected. Clientelism, strict subordination, exclusion, personalized trust, and a strong sense of hierarchy have become new country's systemic foundations (Liebert et al., 2013: 25). Basic democratic principles like equity, transparency, and accountability have significantly eroded in modern Russian administration.

2.2 *Russian Administrative Culture*

Russian administrative culture development has gone through a few different phases covering a long time starting from Emperor Peter I's reforms in early eighteenth century up to current state of affairs. In the nineteenth century, interconnectedness of regional and local administration in Russia used to be based on personal loyalty to the Emperor and his court as appointments, promotions, or resignations were primarily dependent on whether the Emperor could trust to a governor and charge him to implement imperial policies. Professionalism, experience, and noble origin would also be

taken into account but seemed to have a minor importance. The same principle spread further down in bureaucratic hierarchy from governors to their appointees—personal trust and loyalty was the key to binding gigantic empire together. This administrative culture (Önder & Nyadera, 2020), which has not been completely overcome until now, tended to take an ugly shape of title worship (“chinopochitanie”)—humiliating mode of communication between subordinates and bosses, which was brilliantly criticized in Mikhail Saltykov-Shchedrin’s satiric essays. However, many reforms made in this period had the aim to professionalize bureaucratic structures of civil service. In addition to that, in late nineteenth century, the elements of local self-government and community services independent from state administration emerged in the form of “zemstvo” that became a school of volunteering, charity, and grassroots democracy for Russian merchants and intelligentsia.

When Bolsheviks took over the power, they tried to combine professional expertise with political participation and ideological loyalty. Renewed trend of centralization and autocracy under President Putin has made loyalty to the regime a key characteristic for a successful bureaucrat again. In modern Russia, one hardly can follow a career path in civil service without joining United Russia Party supporting every Putin’s initiative, developing and implementing authoritarian legislation that is repressive for any form of free deliberation and opposition activities including public critique of government (“an insult of a public official” is considered to be a crime as per Article 319 of Russia’s Criminal Code) and substantially constrains freedom of assembly (in fact, any public event that is not formally permitted by the local government is automatically against the law).

In autocratic systems such as Russia, the bureaucracy and military play a key role in sustaining imperial power and integrity. At this point, many historians and political analysts distinguish between two groups of government officials holding two role models or two administrative cultures. They are technocrats, professional civil servants (“chinovniki”), who just do their job complying with the game rules, no matter what they are and who set them. They are also referred to as “robust household managers” (“krepkie hoziaystvenniki”) meaning that they have nothing to do with politics but only with economy. Technocrats used to be loyal to Yeltsin are now no less loyal to Putin’s regime. The second group that has been eagerly supported by Putin throughout the years is siloviki, or people with military or special services background. They are trusted mostly because they share life views and experience with the head of state. It is no surprise that they will support Putin at any cost, hence it is them who can be called a political elite of modern Russia.

Russian administration weakness along with economic inefficiency, erosion of legitimacy, and existing imperialism were the key factors for Communist System collapse in Russia. The “old” bureaucracy was accustomed to serving its political patrons rather than society. Post-Soviet reforms have not changed political and administration culture. Autocratic administration in which significant role is played by personal relations and loyalty entails concentration of

power, centralization of everything, and general conservatism and rigidity (Nyadera & Islam, 2020). Under these conditions, Russia remains largely state regulated economy. About one-third of the workforce is still employed by the government directly in public sector, while companies controlled by the state to some extent employ even more workers (Liebert et al., 2013: 28s).

2.3 *Development of Russian Federalism*

In twentieth century, Russian administrative structure significantly changed under Communist rule although some regional contours of imperial times are still clearly visible even now. It should be noticed, however, that Soviet federalism was rather fictional so that regions, districts, or republics had little autonomy. USSR was rather a unitary state with strict subordination and homogeneity. Right after its demolition in 1991 political pendulum moved to the opposite direction turning modern Russian Federation in a federal state with regions enjoying fiscal, political, cultural, economic, and administrative freedom. Due to the lack of administrative professionalism and difficult economic circumstances, this did not result in any improvement of economic effectiveness or positive social change. Yeltsin famously proclaimed: “Take as much sovereignty as you can.” Regions did, of course, but local elites could not use their independence from federal center for better as they simply copied the nation-wide model of legitimacy and loyalty to build up local autocratic hierarchies. Federalism of the 1990s in Russia literally recalled feudalism as many regions even tried to secede (this attempt in Chechen Republic led to two local hybrid wars).

First a few years of Putin’s presidency were focused on diminishing separatist movements, unification of regional legislation (for it not to contradict federal laws), subduing regional elites, and reconstructing a more centralized structure. Back then it was referred to as “rebuilding a vertical of power” to ensure that signals from the center reach every local administration and national policies are implemented properly.

Formally, Russia is a federative state. Nonetheless, regional autonomy is significantly limited mostly by fiscal and financial constraints. The key reform contributed to a vertical of power was a budgetary one which made a region just a subsidiary of central government as long as a lion share of taxes collected go directly to federal budget to later get back in a form of subvention. This change forced regional politicians to seek for a favor of central authorities because otherwise they would be underfunded. Later in 2005, regional governor elections were suspended completely which turned governors and regional governments into obedient executives of federal center’s plans. Although regional elections were reinstated later in 2011, they have never become competitive and open again. Putin’s vertical of power has been successfully built cementing federal structure of the Russian Federation.

3 CENTRAL GOVERNMENT

In the Russian Federation, power is distributed among the central government, regional, and local governments. The central government operates with the principle of separation of powers in the Russian Federation: Legislative is established with Federation Council and State Duma, Executive consists of President and Government, and Judicial branch consists of Courts of General Jurisdiction, Constitutional Court, and Arbitration Court. Russian Federation has the semi-presidential system because of that there are seen strong centralized features in state affairs.

3.1 *Scope of Central Administration*

As mentioned above, Russia is a federal state in which self-governing regions are connected through a central government. Fundamentally, Russian system of public power is split into three branches: legislative, executive, and judicial. According to the Constitution, all branches shall be independent (Constitution of Russia, 1993: Article 10).

Russia as a country with presidential political system is an example of a centralized system in which executive power is shared between the president and the prime minister, but the former is a dominant figure. Party system in Russia is rather weak as all registered political parties are either established by President Office policy-makers (like conservative United Russia Party or social democratic Fair Russia Party) or have demonstrated alignment with Putin's political vision (like national populist Liberal Democratic Party and left-wing Communist Party). This sterilized political arena is dominated by ruling United Russia Party led by former prime minister, ex-president Dmitri Medvedev.

3.2 *Legislative Branch*

Legislature in Russia is bicameral, which means that supreme legislative power belongs to the Federal Assembly consisting of upper and lower chambers. Upper house is called the Federation Council ("Soviet Federatsii") which comprises of 178 representatives of the Federal Subjects (i.e., regions) appointed by governors and regional legislatures. It was established in accordance with the 1993 Constitution in order to act as a voice of regions and it is meant to be non-political (political fractions are forbidden in the upper house).

State Duma ("Gosudarstvennaya Duma") is a political legislative body and the lower house of Russian Federal Assembly with 450 seats; its members are elected for a five-year term. The term Duma comes from Russian verb "dumat" which stands for "to think," so it is designed as a place for collective thought and deliberation. State Duma was first created back in 1906, but its work came to a halt with disintegration of Russian Empire and Bolshevik

Table 1 Functions of Federation Council and State Duma

<i>Federation council</i>	<i>State Duma</i>
Changing of federal subjects' borders	Vote of confidence to government
Proclamation of war and peace and state of emergency situations	Approval of president's candidates for prime minister position
Use of armed forces abroad	Proclaim amnesty
Determining the President elections and end of president's term	Impeachment of the President
Appointing Judges of Constitutional Court	Appointments of The President of Central Bank, Comptroller General and Ombudsman

Source Akhundova, J. (2014). *Karşılaştırmalı Kamu Yönetimi Reformları*. p. 99

revolution in 1917. It was re-established in 1993, when Russia's first President, Boris Yeltsin, introduced a new constitution (Ermasova & Mokeev, 2017: 5534).

Unlike in many democratic countries, comparative power of State Duma is much higher than that of the upper house which under Putin has become a place of honorable retirement for government officials and a "sine cura" job for cronies. State Duma considers every single legal bill in the Russian Federation including those proposed by the Federation Council. Once a bill passes with a majority of votes in Duma, a draft will be sent to the Federation Council for an approval, after which it shall be signed by the president. If the Federation Council rejects it, a draft goes back to the lower house to be revised and develop a compromise version. In fact, as Federation Council is almost dysfunctional, it hardly ever happens, so that if a bill has passed the Duma, it effectively means that the work is done. After all, for that the United Russia Party controls the lower house and realizes Putin's initiatives, a bill passed will most probably be signed by the president, too. In this respect, State Duma of 2010s was unbelievably productive introducing hundreds of new laws, for which it was sarcastically called "a printer gone mad" by independent opposition politicians. With regard to electoral system, one half of the members of Russian parliament are elected in their regional constituencies (the candidates normally have little connection to territories they are supposed to represent, though) while another half is directly elected by proportional nation-wide vote for political parties (Table 1).

3.3 *Executive Branch*

Executive branch of power in Russia is formally in the arms of federal government, but as far as the president is a head of state, he or she supervises the cabinet's work in general and is entitled to issue presidential decrees to regulate certain issues when needed. The balance of power between the president and the prime minister is determined by the Federal Constitutional Law Bill

of 1997, which gives advantage to the president to influence all government's work, especially in questions related to domestic and foreign policies.

3.3.1 *Administrative Position of the Head of State*

The Head of State is the President of the Russian Federation. He is a central figure of executive power. Formally, president of the Russian Federation is elected by citizens on the basis of universal, equal, and direct suffrage by secret ballot (Constitution of Russia, 1993: Article 81). One person can have two continuous terms at most. Presidential candidate has to be at least 35 years old and hold permanent Russian residence no less than ten years. With the constitutional amendments of 2008, presidential term has been extended from four to six years, and upon the amendments of 2020, it has been reset so that the limitation of two terms in a row is not applied to those who had held the position earlier (apparently, there is only one such a person—Vladimir Putin). President is the guarantor of Constitution, civil and human rights, and liberties (Constitution of Russia, 1993: Article 80). Some of the presidential powers and responsibilities are the following:

- Appointing, by agreement with the State Duma, the Chairman of Government of the Russian Federation.
- Suggesting the State Duma a candidate for the position of the Head of Central Bank.
- Suggesting to the Federation Council candidates to be appointed as federal judges to the Courts of Russian Federation.
- To form and chair the Security Council of the Russian Federation.
- To approve the military doctrine of the Russian Federation.
- Appointing and dismissing supreme command of the Armed Forces.
- To announce the State Duma elections, according to the Constitution and federal laws.
- To dissolve the State Duma in cases enlisted in the Constitution.
- To submit drafts of bills and acts to the State Duma.
- Being the Supreme Commander-in-Chief of the Armed Forces.
- Issuing presidential decrees and orders.

The president issues decree and administrative orders, which are valid all over the state borders. There are two organizations working under the presidency: the “Presidential Executive Office” which support the president in administrative matters, and the “Security Council” which directly report to the president, and the “State Council” and “Presidential Commissions” and “Presidential Boards” compose important parts of presidential organization (Tellal & Keskin, 2013: 412).

3.3.2 *Impeachment of the President*

Russian President may be impeached by the Federation Council only for a suspicion of committing a high treason or a grave crime. Impeachment is initiated by the State Duma and needs to be confirmed by the Supreme Court as well as the Constitutional Court of the Russian Federation.

The decision to impeach president needs to be supported by two-thirds of votes in both chambers of the Federal Assembly. Once the impeachment case has been opened, the decision must be made within the period of three months. If the period mentioned had passed without certain outcomes and had not been approved by the Federation Council, all the charges must be rejected.

3.4 *Judicial Branch*

Judicial power in the Russian Federation belongs exclusively to the courts of law. The courts shall carry out their activities in accordance with the constitution, civil, administrative, and criminal legislation, and proceedings (Akhundova, 2014). There are three main jurisdictional courts in the Russian Federation:

1. Courts of General Jurisdiction.
2. Constitutional Court.
3. Arbitration Court.

Their powers and jurisdiction are defined by the Constitution (articles from 118 to 129). General Jurisdiction Courts headed by the Supreme Court of the Russian Federation have civil and military jurisdiction. They are responsible for all criminal, civil, administrative, and other cases dealt with on the basis of the Constitution, federal laws, procedural norms, and other legislative acts. Constitutional Court consists of eleven judges (as per Constitutional amendments of 2020). It is responsible for rulings on the compliance of normative acts in the Russian Federation to the Constitution (Thorson, 2012: xii).

Arbitration Court is a supreme judicial body for economic disputes and other cases examined by courts of arbitration. It carries out judicial supervision over business activities in accordance with federal laws (Constitution of Russia, 1993: Article 127).

Justice in the Russian Federation is administered through the courts of law. To be eligible for a position of federal judge a citizen of the Russian Federation must be over twenty-five years old, have graduated from a law school, and have had five years of legal service record. Judges are independent in their decisions and report only to the Constitution and federal laws. They possess legal immunity and may not face criminal charges other than those according to the federal law (Constitution of Russia, 1993: Article 122). All the judges

are appointed for life by the Federation Council on the suggestion of the President (Thorson, 2012: 39).

3.5 *Federal Government*

Executive power is shared between the president of and the government. As the head of government, prime minister (chairman) works in cooperation with ministers responsible for regulation of designated fields of social life. However, several federal services and federal agencies report directly to prime minister.

Prime minister is the most important figure after the president. He or she is appointed by the president and approved by the State Duma. He or she also proposes candidates for their deputies and other federal ministers. The government resides in Moscow—in so-called White House (which has nothing to do with its American peer in terms of architecture excepting the color).

All government duties and responsibilities are determined by federal constitutional law and include: developing, submitting for approval, and executing the federal budget, annual reports about the work results, implementation of financial, credit, and monetary policies, implementation of state policies in the spheres of culture, science, education, health care, social security, and environment, implementation of foreign policy of the Russian Federation, measures to ensure the rule of law, human rights protection, property rights enforcement, protection of public order, etc. In Russia, there are currently twenty-one federal ministries, some with their own subordinate agencies and services, and 15 federal services and agencies (The Russian Government official website, 2021).

3.6 *Local Organization of Federal Government*

After incorporation of Crimea and Sevastopol city in 2014, Russia has eighty-five administrative units, also known as federal subjects. As the Constitution states, all subjects are equal in their relations with federal government. There are five different types of administrative units in the Russian Federation, which are rather names not implying big difference in legal status:

1. Republics (22 in total);
2. Regions (mostly referred to as “Oblast” (46) or “Kraj” (9));
3. Cities of federal importance (Moscow, St. Petersburg, and newly added Sevastopol);
4. Autonomous region (1 region);
5. Autonomous districts (4 districts).

3.7 *Federal Districts*

In addition to federal subjects, the Russian Federation is also split into eight federal districts based on geographical principle, every of which comprises a few federal subjects. Heads of federal districts are representatives of the president assigned to supervise administrative subjects. This division, even though is not official, is being widely used in state-related statistics, reports, and policies.

Federal Districts are as follows:

1. Central FD,
2. North-Western FD,
3. Southern FD,
4. Far Eastern FD,
5. Siberian FD,
6. Urals FD,
7. Privolzhsky FD,
8. North-Caucasian FD.

3.8 *Independent Agencies*

In the scope of Russian federal government, there are agencies and services, established by the government but enjoying a great deal of autonomy in their work. The agencies are highly varied given that they relate to intelligence, economy and finances, state administration, media, science and culture, welfare, and domestic and international security. The extent of autonomy these agencies have differs from case to case meaning that some report to the government on a regular basis, while others directly and only to the president. Among those working under presidential supervision, there are four agencies dealing with intelligence and state security, members of which form the cohort of informal political elite—“siloviki” influencing national agenda greatly. The most powerful is the Federal Security Service (Federalnaya Sluzhba Bezopasnosti, or FSB), a successor of Soviet KGB and long-term Putin’s employer in 1970–1980s. Other siloviki agencies in this row are Foreign Intelligence Service (Sluzhba Vneshnei Razvedki) and Main Intelligence Directorate (Glavnoe Razvedyvatelnoe Upravlenie, GRU), which are both well known for how they operate abroad using diplomatic covers inside embassies but outside of diplomatic institutions. The fourth one is the Federal Guardia Service (Federalnaya Sluzhba Okhrany, or FSO) also incorporating the Presidential Security Service (Sluzhba Bezopasnosti Prezidenta, SBP). FSO guards the president, key government figures, and locations (like Kremlin Regiment in Moscow).

4 LOCAL GOVERNMENTS

Russian Federation has a unique local structure different from lots of countries. There is a strong central system in Russia, which is the product of various reforms made by the previous president. Russia heavily adopted central government system because it emerged from its unique historical, geographical, socio-cultural, economic, and administrative characteristics. Because of the large area of Russian Federation, there are several administrative units for providing integrity of the Kremlin's power. Those administrative units mostly depended to the central government.

4.1 *Scope of Local Governments*

In Russia, local governments ensure the execution of rule of law within their borders and ensure public interest in the cases related to public goods. Local governments are formed via the system of local elections (governor, regional, and municipal councils). They are entitled to manage municipal property, form and execute their budgets, set up appropriate local taxes, maintain public order, and resolve other issues of local scope. However, the use of given authorities is under central government's control. According to the Russian Constitution, it consists of 85 administrative units.

Before the Constitution of 1993, in Soviet Russia, there were only virtual dysfunctional forms of local government masking de facto unitary system. According to the Article 12 of the Constitution, "local self-governments shall be ratified and guaranteed." After all, it means that local self-government bodies shall be separated from state authorities. This confusing status of self-government is made even more complicated with the fact that the state is supposed to fund all municipal budgets as they lack fiscal autonomy.

In Russia, local regional government is meant to be separated from self-government so that, for example, a governor is local government civil servant, while a mayor or a local council member is self-government (or municipal) civil servants and hence are not classified as state bureaucrats. Mayors do not report to governors and municipal councils do not report to anybody except for citizens of a constituency. Apart from that, according to the up-to-date amendments of 2020 to the Constitution, local self-government is formally included in "the system of public power," whatever it may mean under conditions of soft authoritarian state so as to justify redistribution of funds among governments of all levels.

However, this structure becomes less puzzling when one realizes that under current political regime and strict "vertical of power," regional government as well as city or township self-governments are nothing but nominal authorities with almost no political, financial, or administrative autonomy. In fact, local governments are bound together to form a hierarchical structure of subordination by formal and informal channels.

Auditing in its modern forms appeared in Russia in the second half of the 1980s, during the Perestroika period. It took almost thirty years, and today we have good reason to claim that; “auditing has become one of Russia’s most successful business sectors” (Guzov, 2016). The central federal administration may impose direct financial sanctions and supervision on all federal states. The finance of local authorities, that is audited and supported by federal units, is often in need of the resources that are provided by the central government.

4.2 *Administrative Structure of Local Governments*

As mentioned above, the Russian Federation is divided into federal subjects of five different types: republics, regions, cities of federal importance, autonomous region, and autonomous districts. According to latest information of OECD in 2016, in Russian federal subjects, there are the following sub-divisions: 19.769 urban and rural settlements, 286 intra-city entities, 1.788 rayons, and 563 cities (urban okrugs). In total, there are 22489 sub-national governments in Russian Federation (OECD, 2016).

There are also quite a few territories with special status. Kourliandskaia, Nikolayenko, and Golovanova in their work about local government in Russia mention forty territories that are classified as restricted access territories (“Zakrytye Administrativno-Territorialnye Obrazovanya” or ZATOs) and fall under the jurisdiction of the federal government (the Ministry of Defense and the Ministry of Nuclear Energy). As defined in the federal law, “ZATOs can be urban or rural settlements whose territorial boundaries may overlap regional or rayon boundaries. The boundaries and administrative subordination of ZATOs are determined by the federal government, as are the rights and responsibilities of regional governments with respect to the ZATOs located in their territory” (Kourliandskaia et al., 2016: 2). Their finances are directly managed by the federal government, so that they have independence from regional governments. Currently, a new debate regarding ZATO’s status came in public focus. Russian government is thinking to reduce the number of these restricted areas and dismantle their privileges (Kourliandskaia et al., 2016: 3).

Administrative structure of Russian urban self-government includes towns and villages within city borders, the districts governed by mayors. Self-governments in rural areas comprise rayons. Rayons are considered as municipalities and divided into smaller units such as sub-rayon towns, townships, villages, or rural districts. Rayons are associations that ensure public goods on local level. They are formally separate from federal and regional state administration. Villages represent is the commonest model of local self-government applied in country side. Under Putin’s Administration a federal reform program “Social Development of the Village 2010” was accepted in 2002. The program contains a range of activities planned to support the development of social and physical substructure, and to build information and consulting services in rural areas (Ovchintseva, 2003: 39).

4.3 *Organs of Local Authorities*

Both regional governments and local self-governments contain legislative and executive institutions. Regions are normally administered by the Head of Region (the Governor for St Petersburg and Sevastopol, or the Mayor for Moscow). Legislative branch of power is represented by local councils or dumas. The same system is applied in city, town, and rayon administration. Regional and local legislatures are normally elected by the public for an average of four years (Wollmann & Gritsenko, 2009: 242). Each municipality has their own statutes and regulations, which must not contradict federal law. However, such an alleged independence is turned down with the fact that self-government has little space for political or budgetary maneuver as local budgets are largely dependent on higher level administrative units in state hierarchy.

4.4 *Financial Structure of Local Governments*

In 1991, the new Federal Law on Taxes determined revenue sources for local government budgets. This was an early effort to establish financial autonomy of local budgets. But the main problem with local government funding was that the revenue from local taxes and fees could not cover even twenty percent of the needs. Enormous deficit had to be covered by the regional governments through intergovernmental transfers. The Law on Local Government Finance established some basic principles for municipal budgetary process, such as maximum level of deficit, appropriate financial risks, and other financial disciplinary rules.

There are two sources of funding of local governments in Russia. First, the lion share comes from income tax (flat scale tax, 13%) and partly from fees and royalties paid by private renters of regional and municipal property. This does not give much financial autonomy, however, as regions are responsible for local healthcare, education, infrastructure, etc. In fact, regional budgets function rather as accounting departments for all extended welfare state system without a chance to make big decisions. Second, as local government's own funding is normally not enough to cover all its expenses, federal government subsidizes the deficit making local administration loyal to the center (Akhundova, 2014).

There is no big difference among Russian regions in terms of administrative power they have. Current federal system is relatively strict and uniformed with minor specifics deriving from different levels of regional economic development and consequently from the income of regional government. For example, federal cities such as Moscow and St. Petersburg enjoy more administrative freedom due to being classified as regions and getting funding from income tax even though they are in fact cities without rural areas and with lower infrastructure expenses. The only exception to relatively homogeneous federal system in Russia is Chechen Republic. This region has both political and administrative autonomy unparalleled in any other part of Russia even

though its budget is largely supported by federal subventions. But as they say, an exception only confirms the rule that in modern Russia local governments normally lack authority and funds to deal with local problems.

5 PUBLIC PERSONNEL SYSTEM

Even though Russia stands as a developed state, it is possible to see some disruptions in the public personnel system. Government corruption and distorted values of work done by inspection institutions are presented in Russia, like in every other country. Although Russia is trying to apply the principles of good government in order to protect its citizen's and civil servants' rights and freedoms, division of power in modernism administration is holding the progress one step back, so are still not actively applied in the public personnel system (Aarrevaara, 1999).

5.1 *Overview of Public Personnel System*

The importance of personnel management in state agencies and public sector is increasing all over the world in parallel with expansion of state duties and services. There are three major groups of government officials and officers in Russia:

- High-level officials who make political decisions, and appointed or elected in accordance with the Constitution and federal laws.
- Appointed officers who execute political decisions and implement policies making administrative decisions. They are employees in state institutions hired by contract.
- Lower-level state and municipal officers also employed by contract who do all the paperwork and not responsible for decision-making.

Russian system of public personnel is partly career-based. It means that there are no certain requirements for entering work or succeeding a position in government as well as any clear gradual way of going up career ladder. Personal and political loyalty is the key for higher level officials. As it prevails over professional performance, experience, qualifications, education, etc., it creates fruitful soil for nepotism and corruption. There is no guarantee of staying in service for a certain period of time (Tortop, 2017: 42).

Interestingly, based on the OECD analysis of 2012, there was 71.7% of female employees in the central government workforce, which is much higher from the average of 49.5%. Also, there is 36.2% of working population under the age of thirty, which is a lot more than the average of 11.7%.

5.2 *Administrative Techniques Used in Public Personnel System*

In 2003, Russia introduced a unified system of civil service with clear structure, hierarchy, and range of responsibilities assigned to every level. From then on, all civil servants are classified into five hierarchical “classes” (cohorts) as follows (from highest to lowest): Executive State Counselors (of 3 consecutive degrees), State Counselors (of 3 degrees), Counselors (of 3 degrees), Referents (of 3 degrees), and Secretaries (of 3 degrees).

Personnel management techniques in Russian government embrace formal instructions, pay setting, performance assessment, promotion system, mobility, training, and work conditions. According to Russian labor law, working hours under full-time employment cannot exceed 40 hours per week. This primarily applies to civil servants as private job market is much more flexible and provides with an opportunity to work more or less (with higher or lower pay, indeed). Overtime work is not prohibited, but generally requires the employee’s consent and additional payment. The minimum guaranteed rest break during a working day is 30 minutes (Employment and employee’s benefits, Practical Law 2017).

5.3 *Unionization of Public Personnel System*

According to OECD’s recent data, unionization in Russian public personnel system is present in approximately 60% of public servants that are interested to join a union. However, the ratio of unionization has by all accounts reduced over the last 10 years. Each employee is entitled to join a union, but they hardly ever go on strike (OECD, 2016). Due to general weakness of trade unions in Russia, they are considered to be a pragmatic tool of access to a network of mutual support and such benefits as discounted tours and travel, additional allowances for children, etc. Unions of civil servants (like any other professional unions) in Russia are by no means the organizations capable of fighting for better labor conditions or taking any political actions. However, under current circumstances it is not a big deal as Russian bureaucracy is a privileged group, and therefore it has little to complain about.

6 NGOs/CIVIL SOCIETY

The term “civil society” in Russia is frequently used to refer to civil organizations and movements emerged during and after the collapse of the Soviet Union in the early 1990s (Buxton & Konovalova, 2012: 1). With the dissolution of the Soviet Union and the establishment of the Russian Federation, Russia experienced broad mobilization of civil society. According to Gellner (1994), despite the development of “kernels” of civil society started more than 30 years ago, Russian civil society remains weak and ineffective in contrast to ever-strengthening state. During Vladimir Putin’s presidency a strict top-down order has been applied throughout all social spheres in Russia including

non-profit sector. Current political regime jealously sees NGOs as competitors and ideological opponents to the state. That is why last two decades in Russia witnessed an unprecedented pressure on all sorts of independent not-for-profit organizations, charities, religious groups, trade unions, and advocacy groups.

Russian law identifies as non-government organizations all sorts of institutions, foundations, initiatives, and community groups which are neither commercial firms, nor state agencies, or state-run public institutions. The legal criterion for an NGO is a pursuit of non-profit objectives specified in its documents. No surprise that this category includes such different organizations as Russian Orthodox Church, all other churches and sects, public policy think-tanks, trade unions, youth organizations, sport clubs, ethnic and cultural autonomies, charitable foundations, etc. Altogether they form Russian civil society consisting of more than 210.000 organizations registered and administered by Federal Ministry of Justice.

Among instruments of control over NGOs the most repressive ones are “the register of foreign agents” and “the register of unwanted organizations.” The former category includes the NGOs which ever received any funding from abroad (even from a private individual). Their operations are watchfully controlled and unofficially followed by secret services, but what is even more harmful is that whenever their name is mentioned in media or in public it must be specified that they are “foreign agents.” In Russian, it means both a representative of interests of foreigners and someone working for foreign secret services. Of course, it destroys a reputation of those NGOs which fundraising activities are not limited to Russia only, even if they receive no money from any foreign government. In fact, this law has become a simple tool for subduing non-profit sphere as any NGO can instantly be turned into “a foreign agent” by arranging a single tweaked donation from abroad. Those organizations which were found most dangerous to the political course of Russian government were put in the register of unwanted organizations which operations are completely prohibited in the Russian Federation. Among those there are: Association of Schools of Political Studies of the Council of Europe, European Endowment for Democracy, Free Russia Foundation, the National Endowment for Democracy, Open Society Foundation, and others.

7 E-GOVERNMENT AND ARTIFICIAL INTELLIGENCE IN RUSSIAN ADMINISTRATIVE SYSTEM

E-government is a concept introduced to public policy and administration at the end of the twentieth century with the surge in development of computer technologies and spread of the internet. Ideas of implementation of IT in public administration can be traced back to early 1990s but their realization took much longer time. E-government refers to government agencies using information technologies in building up relations with citizens, businesses, and other agencies. Russian institutions, legal regulations, and technological

infrastructure of e-government started developing in 2002. At first, the development was conducted via federal program “Electronic Russia” effective from 2002 to 2010, then through the program titled “Information Society” from 2011 to 2020.

The objectives of the above-mentioned programs were the following: systematization of state services, unification of application process, increasing availability of state services to citizens, promoting transparency of operations and accountability of state personnel, improvement of technological infrastructure of government, and even bettering the image of bureaucratic mechanism traditionally seen as something indolent and corrupt to make it modern and friendly.

At this point, this new view of government is being developed on federal, regional, and local levels. On the federal level, it is administered by the Ministry for Digital Development, Communications, and Mass Media as well as a few independent agencies, while in regions, all the work is supervised by Councils for Regional Informatization (CRI). This sphere has been one of success stories in Russian administrative experience as the pace of digitalization of state services and overall performance of e-government beats even most optimistic expectations. Now, all one’s tax payments and reports, appointments with officials, applications for hundreds of services, claims, and visits to state-run hospitals are just one click away. Identification process is easy and quick as it is done via one’s online bank application. On the other hand, e-government credentials can be used as a secure identification tool in many other private services when there is a need to prove one’s personality.

One of the most problematic areas of e-Government in Russia is integration with regional and self-government IT systems and local operations. Most regions and municipalities do not have sufficient funding to develop and maintain IT infrastructure, so regional and municipal services are under-represented on the platform of e-government and normally require more paperwork than federal ones.

The Strategy on the Information Society of Russian Federation envisions Russia to be within the top 20 countries in the global rankings of the information society development by 2015. According to the UN e-Government Development Index, the Russian Federation was consecutively placed at the following spots: 60th in 2008, 59th in 2010, and 27th in both 2012 and 2014 (World Bank Group, Digital Government—Prospects for Russia, 2016).

Dizzying acceleration of technological development reveals innovations that are capable of changing the whole world. Artificial intelligence (AI) is the last link in the chain of improvements and one of the most important topics on our century’s agenda (Saygılı, 2020). As President Putin said: “Artificial intelligence is the future, not only for Russia, but for all humankind. It comes with colossal opportunities, but also threats that are difficult to predict. Whoever becomes the leader in this sphere will become the ruler of the world” (Putin, 2017).

Like countries such as China and America that continue to work in the field of artificial intelligence without slowing down, Russia also gives importance to the field of artificial intelligence (Önder & Saygılı, 2018: 659). In October 2019, the Office of the President of the Russian Federation published the national AI strategy in the decree “On the Development of Artificial Intelligence in the Russian Federation” (Future of Life Institute, 2020). This Strategy describes the aims and fundamental objectives for AI development in the Russian Federation to render Russia as a leading AI power in the world by 2030 (CSET, 2019).

8 CONCLUSION

The culture and traditions of public administration in Russia have been shaped by the events of Russian political history many of which could be called national tragedies. Nonetheless, at this point, the country aims to be an economic and political power on international arena, and hence, it needs to overcome burdensome tendencies inherited from its past. In this respect, public administration system in Russia is still struggling with archaic elements of imperial and totalitarian administrative systems such as domination of siloviki political elite, enormous corruption, lack of transparency and democratic control, hypercentralization, and red tape. Ordering, unification, and rationalization of principles of civil service, improvements in the sphere of e-government, and a big deal of regulations for public administration are among the most important achievements of Russian government but there is still a lot to be done to make formal institutions work properly. It would require significant changes in political culture that are impossible without a political will.

Under Putin, Russia has become a much stronger and centralized federal state with sustainable economy, but it cannot be also ignored that he has moved the country away from democracy and deployed practices of systemic violations of human rights. In future, it will be a major obstacle for both economic and administrative development.

Russia as one of the developing countries is still on the path of reforms that should lead to further development in the area of public administration. Taking into consideration its long and rich history, it can be said that nearly every scenario of the future is possible in this country: from stagnation due to dominating conservative political and administrative culture to a rapid breakthrough with progressive reforms (Table 2).

9 INTERESTING FACTS ABOUT RUSSIA

1. Russia is the largest country in the world (17.125,187 km²) (Worldometers, 2021).
2. Moscow has more billionaires per capita than anywhere else in the world (Geromel, 2013).

Table 2 Main features of public administration systems

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Administrative history	Geopolitical situation	Strategic
	Colonial history	Yes (Imperial times)
	Legacy of bureaucracy	Yes (Technocracy)
	Centralized bureaucracy	Strong
	Role of military	Weak military influence
	Political culture	Conservative
	Administrative culture	Not participative
	Professionalism	Moderate
	Politicization of bureaucracy	High
	Dominant state ideology	Conservatism
Legal structure	Nature of constitution	Written
	Origin of constitution	The Russian constitution of 1993 (with substantial amendments of 2020)
	Strong constitution	No
	Constitutional rigidity	No
	Created by	Civil initiatives
	Revised by bureaucracy	Yes
	Administrative judiciary system	Weak
Central government	State structure	Federal
	Government structure	Presidential
	Hierarchical structure	Strong
	Local extension agencies	Too many
	Central government	Yes & strong
	Coordinating mechanisms	Weak
	Transparent financing system	Moderate
	Monitoring	Moderate
	Independent regulatory agencies	Exist
	Local governments	Financial autonomy
Political autonomy		None
Council types		Council mayor or council manager (dependent on regional Statute)
Mayors		Elected or appointed (dependent on regional Statute)
Decision making bodies		Exist (local Councils or Dumas)
Central tutelage/monitoring		Exist & strong

(continued)

Table 2 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Intergovernmental relations	Subsidiarity principle	Exist
	Decentralization type	Delegation
	Logic for Division of tasks	Political
	Tutelage/monitoring	Strong
	Communication	Moderate, both formal and informal
Public personnel system	Civil services	Mixed with elements of nepotism Prestigious
	Scope of civil services	7% of total workforce (as of 2019)
	Recruitment and promotion	Political not fair
CSOs/civil society	Nationwide exam	Does not exist
	Politicization in general	Moderate
	Unionization	Weak
	Size of Civil Society	More than 210,000 NGOs registered (as of 2021)
	Institutionalization	Strong
	Partnership with the state	Moderate
	Political pressure/ domination	Strong
	Major financial revenues	All the following: membership fees, operating incomes, government supports, donations, and fundraising activities, rents
Reform philosophy	Supportive national culture	Weak
	Political regime & civil society relations	Moderate
	Civil society	Not prestigious
	Dominant reform paradigm	Governance reforms
	Policy Transfer	Policy adaptation
	E-government reforms	Completed
	Artificial intelligence (AI) reforms	Partial
	Influence of international actors	None
New reforms (5 years)	Constitutional reform, legal constraints on NGOs' activities, the launch of open tender and state procurement system, extension of e-government	

Source Adapted and developed from Önder and Zengin (2022)

3. 70% of Russia is Siberia and 20% of world's unfrozen fresh water is located in the Russia's Baikal Lake (Unesco, 2021).
4. Russia has about 10 secret cities with their names and location unknown (Similar to ZATOs territories) (Bukharin et al., 1999: 1).
5. Russia is the second largest producer of oil in the world (Slav, 2021).
6. Russia and United States are less than 4 km apart at the nearest point. (Maheshwari, 2017).
7. Russia has over approximately 6,255 nuclear weapons, more than any other country (FAS, 2021).
8. Russia has 9 million more women than men (Manaev, 2019).
9. There was a "Beard Tax" in Russia, during Peter the Great's Reign, paid by anyone who had a beard (Blazeski, 2016).
10. The dialing code for Russia is 007 (Russia Beyond, 2021).

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People's Republic of China

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I INTRODUCTION

China is one of the most important countries of the world with its history, which based on 4000–5000 years ago and with its current economic and political efficiency by the help of population of 1.439 billion in accordance with 2020 figures from the United Nations (Maverick, 2020).

According to Chun (2013: 3), China has a long history of deeply complicated, progressive, and transformative experiences between multiethnic, multi-regional, and multifaceted peoples, which have transformed it into one of the world's oldest and largest cultures or nations. As a result of the monumental

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transformations, he emphasizes that either the Chinese state or Chinese society can never act as a consistent monolith, as they offer China a broad internal spectrum and diverse external impacts, as well as historically competitive local forces. Therefore, there will never be such thing as a singular, true Chineseness in the future.

China is the largest country according to its population, and it is surrounded by the countries where the majority of the population of the world is located. In addition to struggling with many problems within it, China is also in a struggle with neighboring countries and even with countries that are not neighbors, such as the United States of America (Islam, 2019, 2020; Islam & Cansu, 2020, 2021).

The overwhelming majority of Chinese compatriots (roughly 92%) are ethnically Chinese. The other 8% consists of ethnic minorities from over 50 nations. The majority of these minority groups, especially in Tibet, live in the country's geopolitically precise border regions. As a result, the frequently tense and often hostile relationship between China's minority groups and Beijing's central government has become a critical and rapidly evaporating problem in Chinese politics today (Joseph, 2013: 625). Chun (2013: 3) emphasizes that those who live in China and the Chinese state, its political culture, historical accumulation, and the turmoil faced in small countries do not have a simple relationship. There are many sources and encyclopedic works on the numerous dynasties that Chinese history has experienced and their relation to one another and their struggles. Especially after 1912, the establishment of the PRC and the wars that started with other countries during the struggles between the conservatives and the Communists throughout the country have been subject to many studies. For this reason, the understanding of management and bureaucracy will be given shortly in this study in the direction of Confucius understanding which is kept in mind before and after this historical turning point.

Confucianism, which has an important place in Chinese political culture, is in fact integrated with some values that the state tradition contains (Islam, 2020). Ling (2011) emphasizes the importance of moral administration principles, official dignity, and the cultivation of technical ethic values. As a result, the same aims were divided between social and family education, and political beliefs and goals were socialized. A well-developed anti-corruption mechanism was founded in traditional China through a variety of means bearing legislation, administration, and policy adjustments (Ling, 2011: 162). As a result, despite having an ethical system founded on Confucianism, Chinese political culture has been able to flourish for centuries without moral ideals contributing to corruption.

The Communist Party of China (CCP), which has a historical background that is fiercely intertwined with those who emancipate Stalinist politics with their colleagues in China (Kaple, 2016: 5), is almost the sole power of the Country. For instance, Tyson and Wu (2016: 374) underline that the Fourth Plenum Decision in 2014 is the most comprehensive as an endeavor to date

by the CCP to develop its own conception of the rule of law that includes exclusive implementation of regulations. It is a fact that Party members, party commissions and party supervision are felt in every area, although it is formally expressed that the use of Chinese Communist Party power is reduced in the administration of the country. In this context, intervention of the communist party in the public administration process will be occasionally given in many parts of this work.

2 CHINESE ADMINISTRATIVE HISTORY

China has introduced an important and powerful state tradition in today's world and in many stages of history. Jacques (2009: 273) relates this with influence of China throughout the geography. He states, "Everywhere the magnet is China." He specifically stresses that the Chinese influence extends beyond the borders, to Laos, Cambodia, Japan, and even Australia. He also emphasizes that the agenda throughout the region is mostly set by Beijing. It is important to understand what kind of geographical location China possesses, and also what kind of influences China has in the form of its management understanding and forming it. In this context, it is necessary to touch on the formation and development of the Chinese management system, and the practices in the bureaucratic structure that develop at this stage.

2.1 *Roots and Development of Chinese Administrative Tradition*

China's administrative tradition can be explained by dividing it into three geographical and historical regions:

- The provinces of China accurate, established south of the Great Wall, which were combined under the Qin (221 to 207 B.C.E.) and Han (206 B.C.E. to 220 C.E.) dynasties and have been managed by Chinese or foreign (e.g., Mongol and Manchu) dynasties.
- A much larger zone consisting of the three provinces of the northeast, Jilin, Liaoning, and Heilongjiang (commonly known as Manchuria), Nei Mongol (Inner Mongolia), Xinjiang, Qinghai, and Xizang (Tibet), all of which were adjoined to the Chinese Empire throughout the Qing (Manchu) dynasty (1644–1911). Other Chinese management system periods were Warlords, Nationalists, and Communists (1912–1949), Mao Zedong in Power (1949–1976), Deng Xiaoping and the transformation of Chinese Communism (1977–1997), and from revolutionaries to technocrats (1997 to present).
- The special administrative regions of Macau (Ao'mer) and Hong Kong, which were rescued from Portugal (1999) and Great Britain (1997), respectively (Seekins, 2010: 255).

The Chinese state has a history dating back thousands of years in terms of its formation and development. Chung (2016: 38) emphasizes that the Chinese state system and its integration began to take place 2200 years ago. Until the Qing dynasty fell in 1911, 2000 years Han imperialism continued. At the top of the system was the emperor (huangdi), who objectified the roles of ceremonial chief of state with nearly godly charismatic powers, initial executive, and as the highest legislator (Seekins, 2010: 255).

In the course of Han dynasty, Confucianism (it was an element of central importance in the permanency of the imperial system which was formulated by Confucius (Kong Fuzi, 551–479 B.C.E.) and Mencius (Mengzi, 372–289 B.C.E.) and detailed by Han dynasty scholars. Confucianism acted as the state's moral foundation and established the culture and way of life for the ruling classes; it was a theory of human character, a code of ethics, and a political ideology all rolled into one. In general, Confucians argued that society was a highly synergistic structure consisting of a mixed and closely drawn network of cooperative, but unequal communities, rather than a set of self-interested, private individuals. These were organized by the principles of ren (helpfulness) and li (rites and ceremony). The Confucian doctrine transfused people to live up to the ideals objectified in ren and li, and as a result the empire as a whole would succeed. In this doctrine, moral mobilization was especially underlined. Although the superior and inferior were described sharply, the right of the former to rule was conditioned by the principle that he owned unsurpassed worth and had a manner of charitable paternalism toward the recent. This system caused the growth of the emperor's absolute power in the Ming (1368–1644) and the Qing dynasties and led to major misuse of power (Seekins, 2010: 256).

According to McNeal (2009: 261), after the overthrow of the ethnic Chinese Han of the Ming Dynasty, the Manchu ethnic group founded the Qing Dynasty (1644–1911). The Qing dynasty's inability to maintain internal peace, as well as China's abasement at the hands of Western forces, Russia, and Japan in the nineteenth and early twentieth centuries, led to the dynasty's collapse and the dissociation of the imperial regime itself in 1911, according to Seekins (2010: 256).

When the Republic of China was established in 1912, Dr. Sun Yat-sen became the first president and was the best-known revolutionary in China. Sun was unable to comprehend power, and as a result, China descended into a long period of conflict and division. Warlords, or opposing military leaders, ruled over vast swaths of the land. The Chinese Communist Party (CCP) was founded by a group of intellectuals who were inspired by the 1917 Russian Revolution. Instead of Sun Yat-sen's and Nationalist Party's views, the intellectuals were looking for even more progressive solutions to China's problems. In 1925, Dr. Sun Yat-sen died and Chiang Kai-shek became the Nationalist Party's chief, he was a military leader and he turned against his communist partners. Chiang also co-operated with warlords to suppress the communists and set up an authoritarian regime. (Joseph, 2013: 627).

Chiang Kai-shek has an important position in the history of the Chinese state system, as it demonstrates a state against communism and attempts to make China a permanent member of the United Nations. Kai-shek has won this prestige, both nationally and internationally, by abolishing the previously unfair treaties with the western countries (Wei, 2010: 425). Despite the increase in oppression against the communist party, the thoughts of the party were reached by Mao Zedong until the farthest reaches of China, was spreading rapidly in society. However, Mao's leadership and the effective communication of the communist party to the public were reinforced by the 1937 guerrilla war against the Japanese occupation. The communists got a significant triumph over the US-backed Nationalists, and after the Japanese laid down its arms, the Chinese civil war hastily ended. Chiang Kai-shek and his followers were forced to retreat to Taiwan, a ninety-mile-long island off the coast of China. On October 1, 1949, Mao Zedong has proclaimed the establishment of the People's Republic of China (PRC) (Joseph, 2013: 627).

Mao Zedong focused on the problems of his country, when he took over the administration. To achieve its goals and to silence its enemies, the CCP often used force. The PRC used a centrally planned economy and took major measures toward socialism with the aid of the Soviet Union until the end of 1957. Over twenty million Red warders rampaged across the country during the Great Proletarian Cultural Revolution (1966–1976), destroying countless historical landmarks and cultural artifacts because they were reminders of China's colonial past. All of these events raised questions about who will succeed Mao (Joseph, 2013: 630).

As of 1978, Deng Xiaoping became the most important leader of the country. Deng's policies were a certain fracture with the Maoist past. The protesters that started with inflation and corruption filled the major squares in the final country and bloodily suppressed this protest with the Deng army. Deng compares all these events with the disintegration of the Soviet Union and feared that the Communist systems would be harmed. Deng's influence continued in Jiang Zemin's China from 1993 to 1997 that preceded its economic reforms and fantastic growth. At the end began a new management perspective called "from Revolutionaries to Technocrats" (1997 to present) in PRC. In contrast to the ideological leadership of Mao Zedong and Deng Xiaoping in China's state administration, a technocratic leadership profile emerged with Hu Jintao and Jiang Zemin (they had university training as engineers). As of 2008, the top leaders of the CCP began prepare Xi Jinping (b. 1953, also a technocrat with a grade chemical engineering) instead of Hu Jintao when he retires as head of the party in 2012 and president of the country in 2013. Since Deng Xiaoping, it can be foreseen for the near future in which the CCP will continue to be the most effective target of economic reform and political repression for the protection of power (Joseph, 2013: 631–632).

2.2 *Emergence and Development of Bureaucracy in China*

Confucianism symbolizes the cultural infrastructure of an important historical administration to understand bureaucracy in the Chinese state system. Joseph (2013: 626) stresses that traditional Chinese culture that had effected Chinese bureaucracy tradition was founded on the learnings of the ancient thinker, Confucius (551–479 BCE). In this context, Confucianism underlines subordination to authority, regard for superiors and elders, the significance of education, and the accountability of rulers to rule benevolently. In 221 BCE, the man who would become China's first emperor (Qin Shi Huang) merged a few small kingdoms. He laid the foundation for an empire that lasted more than twenty centuries before it was destroyed in the early twentieth century by a revolution. During those years, China was dominated by a dozen different family-based dynasties. He had the ultimate say on all policies, established regulations, and oversaw the government bureaucracy at all levels during the Qing dynasty (Joseph, 2013: 626).

Although China went through wide geographic expansion as well as other important changes throughout the dynastic era, the primary political and social establishments were kept remarkably coherent throughout the history of the Chinese empire. When compared to similar European institutions, the history and institutions of the imperial Chinese national bureaucracy have a more ancient and established background. Elected senior state officials had to prove their knowledge and skills in the context of Confucianism to election them by the Chinese empire. Although the Chinese dynasty ruled for many years, this dynasty weakened due to various internal rebellions. Some dynasties destroyed but new dynasties always protect the Confucian-settled imperial political system (Joseph, 2013: 626). The continuous processing of the Confucian-settled imperial political system is the creation of a political structure under the title of Legalism, which was actually created by the first Chinese emperor the Qin, which has less than twenty years of life. The Qin had suspicions about Confucianism and burned books that had a direct influence from it. Antagonism of Confucianism, which caused the Qin dynasty to collapse, was always considered by other dynasties until 1912 (Joseph, 2014: 10).

3 CENTRAL GOVERNMENT

China's existing state constitution was enacted in 1982 and has since been amended four times (Lawrence, 2013: 2). The agencies of central government and effective bodies may be included in this section, depending on the constitution. With the task of overseeing the state administration, the National People's Congress (NPC), the Presidency and the State Council, ministries, central units for local governments, and independent organizations will be involved.

3.1 *Administrative Position of Head of State*

The political system of the PRC is qualified by Communist Party effects throughout all the governmental and social institutions' acts. Generally, the presence of the official state ideology is established with the Marxism-Leninism theory. Also, Marxism-Leninism officially plays a substantial role in the establishment of communist ideology of Chinese party-state. In Chinese culture, Mao Zedong conceived Marxism-Leninism in a unique way, and communist ideology was born. However, even though Communist ideology is not as effective as it was at the time of Mao, this ideology is always on the agenda because of the effective power of the CPP (Joseph, 2013: 644). In this direction, the persons, institutions, and parties which active in state administration will be elaborated below.

3.1.1 *National People's Congress (NPC)*

The third article of the China's Constitution, Structure of the State, defines PRC's unicameral legislature by emphasizing the position of the National People's Congress (NPC) as the highest organ of state power and implying the oversight role of four other political organs (The State Council, The State Central Military Commission, The Supreme People's Court, and The Supreme People's Procuratorate) (Lawrence, 2013: 2). The state authority in China is officially established through a system of people's congresses, the most powerful of which is the National People's Congress (NPC), which has the power to formally elect China's president and vice president. Each office in this election has only one candidate, chosen by the Communist Party. The president serves for the same amount of time as the congress (five years), with a two-term limit. NPC is also regulated by the Chinese Communist Party and is not an autonomous government body (Joseph, 2013: 648). The state Constitution gives the NPC a wide range of powers and functions, including:

- The force to amend the constitution
- To make laws
- To control the application of constitutional and legal enactments
- To investigate and approve the national economic plan, the state budget and report on its implementation
- To decide on questions of war and peace
- To apply such other functions and powers as the highest organ of state power that should implement (Saich, 2015: 2).

3.1.2 *The President*

The president of the PRC is China's head of state, but it is a purely ceremonial position. The supreme leader or his designee has always held this office throughout the reform process (O'neil et al., 2010: 303). The president gets together and negotiates with other world leaders. The president of the PRC

has always been an eminent Communist Party leader (Joseph, 2013: 648). Head of state is Xi Jinping (since 14 March 2013).

The power of president is very broad as seen in Fig. 1. The president's position has been strengthened by the general secretary of the Party, the heads of the military committees, the heads of the Economic and Finance committees, and several other such committees, and he is completely cultivating the authoritarian state.

3.1.3 *The State Council*

The State Council is the executive cabinet of the People's Republic of China, and it is chaired by the Premier (Li Keqiang since March 15, 2013). The State Council, which acts similarly to a cabinet in a legislative setting, is led by the premier. The president, a few vice premiers, the heads of government ministries and commissions, and many other senior officials are all in attendance (Joseph, 2013: 648). The State Council currently consists of more than two dozen members, which include ministers or commissioners in charge of functional departments such as the Ministry of Foreign Affairs or the National Health and Family Planning Commission, as well as the governor of the central bank and the auditor-general (who oversees the government's finances). With the exception of one, all of these minister-level officials are CCP members, and the vast majority of them are Central Committee members, with the party being their primary allegiance (Li, 2014: 201–202).

3.2 *Ministries*

As ministries and commissions are formed, merged, or allocated to meet evolving policy needs, the size of the State Council changes. There were over a hundred ministerial-level officials at the top of the Maoist-era planned economy. There are now less than thirty officials, and they are responsible for externalizing both the diminished function of central planning and the administrative facilitating in order to increase government productivity. Most members of the State Council are in charge of specific agencies, including the Ministry of Education or the Commission on Population and Family Planning. China has also constituted a number of super-ministries, such as the National Energy Commission, to arrange policies on complex topics that cannot be managed by a sole ministry. As ministries and commissions are formed, merged, or allocated to meet evolving policy needs, the State Council's composition changes (Joseph, 2013: 648). In Chinese governments, the state council oversees certain commissions that are almost as powerful as ministerial-level bodies.

Ministries and Commissions under the State Council¹:

¹ For more details about other important institutions: <http://english1.english.gov.cn/links.htm>.

- Ministry of Agriculture
- Ministry of Civil Affairs
- Ministry of Commerce
- Ministry of Culture
- Ministry of Education
- Ministry of Environmental Protection
- Ministry of Finance
- Ministry of Foreign Affairs
- Ministry of Housing and Urban–Rural Development
- Ministry of Human Resources and Social Security
- Ministry of Industry and Information Technology
- Ministry of Justice
- Ministry of Land and Resources
- Ministry of National Defence
- Ministry of Public Security
- Ministry of Science and Technology
- Ministry of State Security
- Ministry of Supervision
- Ministry of Transport
- Ministry of Water Resources
- National Audit Office
- National Development and Reform Commission
- National Health and Family Planning Commission
- People's Bank of China
- State Ethnic Affairs Commission

3.3 *Parties, Elections, and Local Organization of Central Governments*

According to Lenin's political centralism, each Party member is linked to a Party organization; the minority is linked to the majority; the lower level organization is linked to the higher level; and each organization and all the Party members are linked to the Party's National Congress and the Centre. Party leaders have a moral responsibility to ensure opportunities for party members to debate, consult, and even criticize. Moreover, leaders embark all-important decisions on those below them, who are expected to fully remain by decisions made at the Centre. In fact, centralism always vanquishes over democracy (O'Neil et al., 2010: 297).

The Chinese Communist Party's influence is felt strongly on the PRC's state governing bodies. Joseph (2013: 644) emphasizes the Chinese Communist Party's argument that it is the only party capable of governing in the best interests of the entire country. As a result, it has the power to enforce China's "leading position" throughout the country. Despite China's recent moves toward a capitalist economy, the CCP insists that it is still constructing socialism with the overall goal of establishing a socialist society that is egalitarian and classless.

Since the Chinese Communist Party (CCP) came to power in 1949, it has experienced two major crises that tested the party's ability to survive: The Cultural Revolution and the Tiananmen Square incident. Following these turbulences, the CCP emphasized intra-party democracy as a critical component of the reform program to avoid the regime's demise. CCP leaders have observed intra-party democracy as a means of instilling vitality in the Party and reducing the numerous drawbacks associated with highly centralized power. Both insiders and outsiders have suggested that democratic processes within the Party could help to set the stage for broad political change (Zeng, 2016: 73). For instance, to aid the nation's political and economic recovery, the Communist Party of China's (CCP) second generation leaders, led by Deng Xiaoping, sought to shift the emphasis of Party tenet away from political campaigns (i.e., marketing to encourage ideological pledge) and toward economic growth with the slogan "focus on economic construction" (Mingus & Jing, 2017: 776). On this context nowadays, the potential effect of fiscal decentralization on economic expansion in China has been extensively studied. China has achieved in maintaining high economic expansion over the past 40 years, which has been accompanied by government reconversion. Also, many scholars have tried to clarify the reasons for this "growth miracle" by thinking economic theories or political reforms (Zhang et al., 2020: 89).

The National Party Congress² and the Central Committee³ are the CCP's highest-ranking bodies. The National Party Congress, on the other hand, meets only once every five years and has over 2,100 members. General secretary (since then, the party's chief has been the general secretary, who oversees the Politburo and the Standing Committee, a role most recently held by Jiang Zemin, 1989–2002, and Hu Jintao, 2002–present), Politburo, and Standing Committee are the other functioning organs of the Chinese Communist Party. The Politburo is a body made up of the Chinese Communist Party's top two dozen or more officials. The Standing Committee,⁴ a subgroup of the Politburo with less than a dozen members, is China's most powerful political organization.

² The symbolically important gathering of around 2,100 Chinese Communist Party delegates, held every five years for about a week, who endorse policies and the assignment of leadership positions that have been determined in advance by the party's far smaller governing bodies. See more details: Joseph (2013: 645).

³ It is made up of the Chinese Communist Party's top 350 or so executives. It meets once a year for about two weeks and is in charge of carrying out the National Party Congress's business while it is not in session. See more details: Joseph (2013: 645).

⁴ China's leaders are all highly educated. Seven of the nine members of the Standing Committee were engineers before entering politics, with one having a Ph.D. in economics and the other in law. Just one of the Politburo's other sixteen members does not have a bachelor's or master's degree. This is a dramatic example of China's directing circles shifting from Maoist and Dengist revolutionaries to technocrats who place the highest priority on science, technology, and higher education as the keys to the country's growth. See more details: Joseph (2013: 645).

It should be examined how the Chinese Communist Party (CCP) is organized to recognize its strong influence on the form of government over the country. First, the party's four most significant core divisions, the Propaganda (or Publicity) Department, the Organization Department, the International Liaison Department, and the United Front Work Department are all audited by the Secretariat. The Secretariat is run by the current managers of the Organization Department, the General Office, and the Propaganda Department. Second, the Organization Department defines the staff appointments of thousands of high-ranking leaders or cadres (individuals who hold positions of authority in a communist party-state; cadres may or may not be Communist Party members) status persons in the government, party and military, as well as large corporations, universities, and other significant institutions. The nomenklatura⁵ ("name list") scheme, which was adopted from the Soviet Communist Party, governs these positions. Third, one of the most powerful ways of leverage of the CCP is determining the duration of a cadre's assignment. The Propaganda Department is in charge of disseminating the party's message as well as media control (Li, 2014: 197).

The United Front Work Department, which fights non-communist groups, incorporates the country's eight "democratic parties," ethnic and religious policy, and deals with the problems concerning Taiwan, Hong Kong, and Macau. The International Liaison Department's job is to establish relations with foreign political parties; it was more significant and effective when there were more communist parties throughout the world (Li, 2014: 198).

In Chinese political life, apart from the Chinese Communist party (CCP), there are eight democratic parties in the political process that are not fully effective. Although these parties had been established before the forming of the People's Republic of China, their mobility was limited in the shadow of the superiority of the Chinese Communist Party.

The type of election system in China is universality, equality, secret ballot, as well as a composition of direct and indirect voting. The electoral law of the National People's Congress and Local People's Congresses was modified in July 1979, by which the implementation of direct election was expanded up to the counties and autonomous counties. This law ensured, for the first time, competitive election of deputies to the people's congresses. Three other major amendments were brought to the law in 1982, 1986, and 1995, respectively. These amendments simplified the enrollment of voters and constricted the gap between the rural and urban areas with respect to linking the representation by deputies to the size of represented population. Also, these amendments

⁵ The Communist Party maintains influence over the assignment of significant officials in all fields of social, economic, and political life through the nomenklatura method of personnel selection. The term is often applied to individuals selected by this scheme, and thus applies to the privileged circles in the Soviet Union and China more generally. See more details: Joseph (2013: 650).

detected the number of deputies to the local people's congresses and emboldened voters to jointly assign candidates. The Chinese choose to call this as a democratic election system with Chinese characteristics (Ahmed, 2017).

3.4 *Chinese Judicial System*

As compared broadly, the PRC's legal system did not function under Mao for the most part, and no criminal law existed prior to 1978. At that time, legal reclamation has established a justice structure, but it continues to benefit the party elite, which still protects the officials from the law. As a result of all of this, party leaders have often selectively broken or violated office rules, propagating or overdoing crimes in order to ambush political rivals or hold up one deviant as an example to others (O'neil et al., 2010: 304). According to Professor He, a chief prosecutor in China reports to the chief of police in a way that is not seen anywhere else in the World (Li, 2014: 202).

According to Joseph (2013: 650), the China Judiciary is structured in such a way that it consists of a four-tiered regime of "people's courts," ranging from a Supreme People's Court to higher (provincial-level), intermediate (city-level), and grassroots (county- and township-level) people's courts. The Supreme People's Court oversees the operation of lower courts and the application of the country's rules, but the most notable distinction from most other countries is that it hears few cases and does not issue judicial criticism of government policies. However, China's leaders are well aware that economic growth necessitates the use of competent lawyers and judicial staff, as well as presumptive legal procedures and incentive documents such as contracts. However, it is still a long way from establishing the rule of law, in which everyone and every organization associated with the Communist Party is accountable to and reliant on the law (Joseph, 2013: 651).

3.5 *The Military, Police, and Internal Security*

The Military, Police, and Internal Security are in the context of law enforcement agencies. Joseph (2013: 651) underlines the People's Liberation Army (PLA) of China is made up of all of the country's land, air, and naval armed forces, all of which are controlled by the PRC Ministry of Defense, which is headed by the Communist Party of China. With 2.3 million active personnel, the PLA is the world's largest military force (drop off nearly 4 million in 1989). The Central Military Commission is the largest body in charge of China's armed forces (CMC). This Commission currently has twelve members, ten of whom are the People's Liberation Army's highest-ranking officers (Joseph, 2013: 652).

In the context of Police and Internal, the Chinese state recognizes a different practice in which the "rule of avoidance" is implemented preferably in the nomination of local highest officials. Regional party secretaries, heads

of discipline creations, and police chiefs are almost entirely chosen from non-native outsiders recruited from another county or the central administration. This application is as necessary as the traditional Chinese practice of the “rule of avoidance,” which prohibited imperial officials from being placed in their home provinces in order to reduce the likelihood of favoritism and regional factionalism (Li, 2014: 213). According to Joseph (2013: 653), the People’s Armed Police (PAP) defends public officials and buildings and applies some border rounds and counter-terrorism functions. PAP has also been named in to quell public disturbances, including employee, rustic, and ethnic unrest. In addition to this, the Ministry of State Security, with a potency of about 1.7 million persons, is accountable for combating espionage and collecting intelligence at home and abroad. As another important structure, the Public Security Bureau directs “re-education through labour” (laojiao) centers for small criminals, juvenile delinquents, those noted to have broken social order, bearing prostitutes and small-scale drug users, as well as political and religious opponents. Furthermore, prisoners can be held in administrative arrests for up to three years without a formal charge or trial.

3.6 *Independent Agencies*

Independent relevance organizations and social movements are not allowed to have a significant impact on the PRC’s political process. The CCP encourages official mass organizations as a way for interest groups to express their views on policy issues under certain parameters. A number of non-governmental organizations (NGOs) that are less closely related to the CCP than official mass organizations have seen substantial changes since the late 1990s. There are a number of national and local non-governmental organizations (NGOs) that are concerned with health, environment, social work, and legal issues. NGOs have to register with the government, but they have a lot of flexibility to work within their functional areas without involving a political party if they stay out of politics and don’t defy official policies. Despite the fact that China has become more politically transparent since Mao Zedong’s time, the party-state remains extremely successful at controlling opposition and preventing the formation of movements that could challenge the CCP’s authority (Joseph, 2013: 663–664).

4 LOCAL GOVERNMENTS

William A. Joseph (2013), who has a lot of work on Chinese government systems and understanding of historical management, draws a general framework on Subnational Government. China (like Japan and France) is a unitary state, according to Joseph (2013: 651), wherein the central government exerts a high degree of power above other government levels. However, unlike the United States and India, a federal structure does not grant subnational governments’ significant policymaking and financial autonomy.

Over the last two decades, China's government administration has been increasingly decentralized, with more authority devolved to provincial and local governments, especially in economic matters. In fact, one of the efforts have also been to try to reduce party intervention in administrative work in the last decades (Joseph, 2013: 651–652). Meanwhile, under a communist regime, PRC has increasingly transitioned from a centrally planned to primarily free market economy (Chen, 2019: 16).

4.1 *Scope of Local Governments*

The scope of local governments owned by the PRC is somewhat different from the central and local governments in other countries. There are four major levels of state structure under the central government in China:

- Provinces
- Cities
- Counties
- Rural towns

Shanghai, Beijing, Chongqing, and Tianjin are the four largest centrally administered cities in China, and there are also five autonomous regions and territories with significant minority populations (such as Tibet and Xinjiang). One of the most important features of local governance is that each form of subnational government has a people's congress that meets infrequently and plays a minor but growing role in governing the affairs of its territory (Joseph, 2013: 651).

Just as the Chinese Communist Party is in the central government, the influence of the Party in the local governments is very high. The Communist Party has an organized asset all along Chinese society. A party secretary and party committee rule CCP organizations in provinces, cities, and counties. There are also around 3.6 million primary party organizations, usually named branches. All of them established all along the country in government offices, workplaces, schools, rural towns, urban neighborhoods, army units, and villages (Joseph, 2013: 647–648).

4.2 *Local Administrative Units*

Local administrative areas in terms of both historical and developmental level can vary in China. Nearly one million people live in some small county towns, which have traffic problems and tall buildings that compete with some of the largest cities of the USA. It is now more difficult, for a number of reasons, to migrate in large-scale from rural to urban. Nonetheless, in China, cities are divided into three levels: county (Xian), prefecture (diqu), and province (sheng) (Hurst, 2014: 322). The central government's authority distribution

over local governments and the administrative hierarchy of local governments operate in an interdependent manner.

China's political structure is unitary, with subnational levels of government linked to the central government. The mayor and other important city officials are elected by higher levels and must be confirmed by the CCP organization department under the PRC's *bianzhi* (or *nomenklatura*) model. Mayors of major cities and party secretary are well-known national political personalities who frequently rise to positions of power in the party-state system. For instance, Jiang Zemin, a former Shanghai mayor (and CCP general secretary), became CCP general secretary in 1989 and China's president in 1993. Xi Jinping, who became CCP general secretary in 2012 and China's president in 2013, formerly worked as a Shanghai party secretary (Hurst, 2014: 323).

4.3 *Organs of Local Authorities and Elections*

In the context of local governments, the management of cities is governed by the influence of the PRC and is managed in a different way compared to other countries. Cities, like the rest of the PRC's administrative tiers, have both a state and a communist party constitution. As a result, the mayor, who oversees the municipal administration and is known as the people's government, is one of the two most influential administrators in a city. The party secretary, who is the head of the municipal party committee and the genuine leader, is the other most powerful administrator. In the majority of instances, the mayor also acts as the deputy secretary of the city's CCP committee (Hurst, 2014: 323).

County-level towns have the same status as agrarian counties, and they tend to be small and under the jurisdiction of a larger city nearby. Prefecture-level cities are vast areas that include a central city and an important agrarian hinterland, rather than actual cities. In reality, by the late 1990s, almost the entire country of China had been organized into such towns, which had risen to prominence as the primary organizational unit between province and county. Finally, Beijing, Chongqing, Shanghai, and Tianjin are direct-administrated municipalities (*zhixiashi*) with provincial status, with no interceder between them and the central government (Hurst, 2014: 322).

People's congresses exist in China's cities, and they are legally authorized to inspect the people's government's treaties, but they have very little power. The citywide people's congress is elected indirectly by members of the district-level people's congresses. The district congress is elected in a straight election, which ensures that all eligible people living in the district are invited to vote for their members. In recent years, these elections have become more competitive and livelier, despite the fact that they are still conducted under the watchful eye of the CCP (Hurst, 2014: 322). In smaller units than cities, the elections are slightly different. The most important steps toward democratic representation and participation have happened in the rural villages. Since the late 1980s, laws have ensured that the village head and other representatives are elected in a fair and transparent manner. Multi-candidate elections with a secret ballot

are common in these elections. Villagers have used them to oust leaders that they believe are incompetent or corrupt. Such grassroots elections are carefully monitored by the village CCP committee. In most cases, the local Communist Party leader has been chosen to serve as both the village head and the local Communist Party leader in a competitive election. This happens often because the Communist Party leader is a well-known figure who enjoys the confidence and support of the villagers.⁶ Women make up just 1% of the village leaders (out of over 600,000).

4.4 *Financial Structure of Local Government*

There has been a recent issue with budget transfer between the Chinese central government and local governments, according to reports. Ahlers and Stephan (2016: 36) point out that the central government has done little to address the increasing fiscal base of local governments. Alternatively, it is blowing over past intergovernmental transfer system fittings. The central government has been rising the share of general transfers since 2012. This denotes the dismantling of a project-oriented strategy based on earmarks for specific programs at the subnational level.

Budget⁷ transfers from central government to local governments are following a fluctuating course. The reality is that transfers are project-based and the amount of transfers can vary as project costs follow a fluctuating course over years.

⁶ Members of the villagers' representative assemblies are chosen from each household or community of households. The assemblies have been more involved in overseeing the activities of elected authorities and making decisions about municipal budgets and health. Any overseers claim that overt grassroots initiatives like this are the beginnings of true democracy. Others see them as a front line for appeasing foreign opponents and providing a means for the rural community to demonstrate dissatisfaction without undermining the country's basic political structure. Recent political reforms have undoubtedly improved public participation and representation in China's democracy. However, elections in the People's Republic of China do not provide voters with a tool to conduct successful audits of party leaders and organizations. From Mao to today, top Chinese communist leaders have consistently argued that multi-party democracy is incompatible with China's customs and socialist values. An official of the National People's Congress provides an important clarification in this respect: "Western-style elections... are a game for the rich. They are affected by the resources and funding that a candidate can utilize. Those who manage to win elections are easily in the shoes of their parties or sponsors and become spokespersons for the minority.... As a socialist country, we cannot simply take the Western approach." See more details: Joseph (2013: 659).

⁷ In the Chinese budgeting system, program expenditures establish the most meaningful area for citizen admission. First, personnel and operating expenditures are already adjusted according to legal or budgetary regulations, so only in the area of program expenditures is there vacancy for citizen participation to make a governmental budget modify. Second, most program expenditures (e.g., substructure) are tightly related to citizens' quality of life (Lin & Chen, 2020: 16).

4.5 *Auditing of Local Authorities*

Budget compliance audits of governments; fiscal audits of governments, state-owned entities (i.e., companies, non-profit entities, and financial institutions) and specific projects; and policy adherence audits of earmarked funds and projects supported by donations or loans from international organizations or foreign governments have been the mainstays of government auditing in China (Funkhouser & Pu, 2019: 66). When the governance structure of other countries is examined, the effect of the single-party activity in the People's Republic of China and the local commissions of this single party is more authoritatively reflected in the local and special administrations' auditing in the country. According to Joseph (2013: 652), the federal government retains considerable authority to intervene in local affairs whenever and wherever it desires. The central authorities' influence is derived not only from their ability to establish national precedent, but also from their oversight of the military and police, the tax system, vital energy resources, and major infrastructure projects. Given the PRC's continental size and great regional diversity, a federal structure with a more equal distribution of power between the central, provincial, and local levels of government has been proposed by a number of political scientists in China and abroad. However, such a motion would be incompatible with the highly centralized structure of a communist party-state.

Some practices have been developed to provide both auditing and social well-being for Chinese local governments. Hurst (2014: 324) indicates that the party-state's stresses on social stability protection, the new system of oversight and social control, grid (network) management (wangge) have been applied in cities all along the country. Using this strategy, each neighborhood or community will be separated into many "grid units," each responsible for a group of households and audited by a "grid captain" and designed by a small team of locals. The grid units' security responsibilities include acquiring information in advance about persons and activities in the region under their jurisdiction. To prevent crime, make arrangements with higher levels of authority when needed and maintain a form of neighborhood watch. These units aimed to improve residents' access to social services including family planning, as well as to simplify and provide spaces for local conflict resolution.

As another monitoring body of local authorities, there is the ombudsman. In terms of China's Ombudsman, it has published some writings that say special officials were appointed to act in the capacity of Ombudsman more than three thousand years ago. During the Yu and Sun dynasties in China, the attendant, known as the "control yuan," was responsible for reporting the people's voice to the Emperor and announcing the Emperor's decision to the people (Satyanand, 2005). The Censorate was a pillar in ancient China whose mission was to monitor the government for any mismanagement that jeopardized the people's rights (Carmona, 2011: 6). In China, the Office of the

Ombudsman will use mediation to settle complaints that do not include significant maladministration if both parties agree. Another problem that needs to be discussed in this context is the fact that the Ministry of Supervision reports directly to the Premier, giving it immense power. It is authorized by statute to inspect, investigate, make recommendations, and, most importantly, levy administrative penalties directly. The ministry's jurisdiction is wide in terms of departments and officials it covers, ranging from the federal government to the provincial-level and even lower (Carmona, 2011: 6).

4.6 *Scope of Special Administrative Regions*

In the PRC, there are two Special Administrative Regions (SAR): Macau and Hong Kong. Hong Kong, a former British colony, became a PRC Special Administrative Region (SAR) in 1997 and has grown to become one of the world's most important trading centers. Macau, China's other Special Administrative Area, was once a Portuguese colony. This region is also known as the "casino economy" region, which joined the PRC in 1999 and, with the exception of international affairs and defense, has a great deal of autonomy from Beijing's administration. (Joseph, 2013: 625).

4.6.1 *Hong Kong Special Administrative Region*

The concepts, values, practices, and implementations of public administration are becoming increasingly similar around the world, and China and Hong Kong are following the trend to respond to globalization's powerful effects (Huque, 2019: 60). Hong Kong-specific democratization movements are based on 1987. In 1988, basic rules for the direct electoral system began to be debated. In 1997, however, the Provisional Legislative Council for Hong Kong, which was transferred to the Chinese government by the British, was established by the Chinese government. The theory of gradual and regular development, as well as the phased increase in the number of directly elected legislators, was used by this council to reach the ultimate target of universal suffrage.

An authoritarian regime that has pre-handled democracy is a naturally unsteady regime, but in Hong Kong, certain contradictions are referred to as the politics of multiple contradictions. It's possible that a Basic Law establishing Hong Kong's people's right to democracy will never be enacted (Chen, 2007: 23).

Generally, Hong Kong SAR has a theory that called "One Country, Two Systems." So (2011) backs up this theory by predicting that Hong Kong will be guided as a Special Administrative Region (SAR), with Hong Kong citizens in charge and a high degree of autonomy that has remained unchanged for the past fifty years. Furthermore, the Beijing government supported the "One Nation, Two Systems" strategy and accepted a hands-off approach to Hong Kong affairs during the first decade of the SAR's existence. Hong Kong, on the other hand, has two governing teams: one is the corporation team of the Hong

Kong Special Administrative Region government, and the other is established as a Chinese government authority responsible for Hong Kong matters on the mainland (So, 2011: 99).

The unicameral Legislative Council (LegCo) is intended to be nothing more than a debating chamber under Hong Kong's Constitution, which was negotiated between Britain and China prior to the handover in 1997 (Basic Law). As a result, Hong Kong has been dubbed an "executive-led" government. On most topics, the government can rely on LegCo support, but opposition parties are given a forum to delay legislation and accept compromises. In reality, Hong Kong's formal executive power structure placed government policymaking in the hands of the Chief Executive (CE) and fifteen secretaries (equivalent to ministers) appointed by the CE but designed by the national government in Beijing. Hong Kong is commonly referred to as a "centralised government" with high levels of discipline and tight control, which is overseen by policy bureaus and powerful central arranging agencies, which impose strict controls in the name of legitimacy and economy (Painter & Yee, 2012: 224).

4.6.2 *Macao Special Administrative Region*

Ho (2011: 60) defines Macao's political culture in early 1998 as a mixed political culture with significant parochial subjects and participant inducements, comprising the main elements of a civic culture. Although the Chinese types in Taiwan and Hong Kong prefer a more democratic and representative government, Macao residents prefer a more conservative outlook and are willing to have an omnipresent government that protects citizens' interests. Corruption had not only become a part of life in Macau, but had also become a way of life. In addition, Macau was founded on graft, with the Portuguese bribing local Chinese officials in the colony's early days to maintain their control (Tso, 2012: 10). Macau, on the other hand, is distinct from Hong Kong in that its alignment with the mainland has become more seamless (Berlie, 2016: 348). In the discourse of traditional forbearance and comprehension, the future is as much a point of orientation as the past in Macau, which is known as the city where East meets West (Berlie, 2016: 351).

The economic background of Macao changed in 2003 when the SAR government liberalized the casino industry with the help of the Chinese government through the "individual free travel" layout. As a result, the casino industry's success in 2006 outperformed that of Las Vegas. Macao is now referred to as "Asia's Las Vegas" and is one of Asia's wealthiest cities (Ho, 2011: 62). Apart from the turmoil that accompanied the sovereignty decline and the illegal activities associated with gambling and casino operations, there was no other time of chaos. In Macau, there is a socially appropriate standard of public order, and violent crime is uncommon. Despite the advantage of being anti-establishment, ingrained political parties are relatively unpopular.

Furthermore, the only significant contact with police occurred when unemployed employees and right-of-abode plaintiffs staged protests (Ho & Lam, 2014: 417–437).

5 PUBLIC PERSONAL SYSTEM

It will be expressed how the Chinese state administration influenced the personnel regime of the Chinese Communist Party's influence in order to understand its work toward civil servants and the public personnel regime. It will also be briefly reviewed in the text of the mutual agreement between the Chinese government officials and the Turkish State Personnel Chief on the personnel regime.

5.1 *Chinese Public Personnel System*

In China, civil service government is based on a one-party structure, with the Chinese Communist Party (CCP) playing a leading role. Authorities also blurred the long-standing legal basis for the Party's management of cadres (dang guan ganbu), or bearer civil servants. China's civil service system should follow Marxism-Leninism, Mao Zedong thought, and Deng Xiaoping theory, according to the Civil Service Law, which was passed in 2006. These three reflect the following important thoughts:

- Follow the primary step of socialism's main line,
- Pay attention to the Communist Party of China's line and policies on cadre issues,
- Adhere to the idea that the Party is in charge of cadre issues (Burns & Xiao qi, 2010: 60).

The CCP's Organization Department (OD) makes civil service management policy, which is overseen by the Politburo and implemented by the Ministry of Human Resources and Social Security (formerly the Ministry of Personnel), especially by the Ministry's civil service bureau. The Party core group within the appropriate bureau, under the oversight of the organization department at the same level, manages and confirms civil service staff verdicts for non-leading roles in the civil service, carrying selection, assessment, and so on. The authority of the nomenklatura governs the top positions. According to the Civil Service Law, becoming a member of a political party is not a requirement for being a civil servant (Burns & Xiao qi, 2010: 61).

During the pre-reform era, the Chinese bureaucracy was torn between pursuing a "red" and a "professional" cadre team. In consequence, class-based cadre selection, technocracy, and widespread political mobilization favored a completely tamed bureaucracy, despite its poor productivity (Jing & Zhu, 2012: 135). Political civil servants will be elected and guided in accordance

with the Constitution and the Organizational Law, according to this point. Despite the fact that the Party for Appointments will recommend them, the Party can only search those who are members of the Party. Career civil servants should be overseen in accordance with pending civil service legislation. The 13th Party Congress decided to bar cadres of party committees from supervising governmental agencies, abolish party organizations with governmental functions, and exclude party organizations from governmental agencies (Jing & Zhu, 2012: 138). Civil servants in China do not have “lifelong tenure” as they do in the West, but they do have a steady career (Chan & Li, 2007: 384).

According to the workshop report⁸ made in 2013 with the staff of the Republic of Turkey State Personnel and the officials of the People's Republic of China Personnel, civil servants were grouped under seven main groups. These were: People working in the Chinese Communist Party, Civil servants who work in the courts, Judges and Prosecutors, Civil servants at the National People's Congress, Civil servants in the Consultative Assembly, Civil servants in other political parties, and Civil servants in charge of administrative services.

5.2 *Administrative Techniques Used in Public Personnel System*

Civil servants are separated into two categories in China on the strength of the Civil Servant Law and relevant response of other laws and statutes. These attendants in varied organs of state administration are contribute of two categories: political civil servants or major officials in state administration; and career civil servants or staff members of state governance. The priors are elected or appointed by the people's congresses or their standing committees and work for limited terms in office. The career civil servants implement day-to-day routine work and enforce state laws and policies. They are gathered through examinations and work as permanent employees of the PRC. The Chinese civil service is regulated into twelve status or levels starting from the Premier at the top to clerical personnel at the bottom. Nowadays there are twenty-seven (previously fifteen) ranks or grades, which are determined by the level of responsibility, degree of difficulty of the tasks, the ability of civil servants, their political probity, operative success, duty performance, and records. Most civil servants in China work in local governments in the country's about 2,800 counties (Ahmed, 2017).

5.3 *Unionization in the Public Personnel System*

Unionism in the Public Personnel System of PRC as an authoritarian state, should be assessed in a different category. Ang (2012) has some determinations in terms of the comparison of the Chinese public system with the union

⁸ For detailed information on the Chinese public personnel system: http://www.dpb.gov.tr/F/Root/daireler/avrupa_birligi_dis_iliskiler/yayinlar/dpb_cin_kitapcigi.pdf.

and other public personnel regimes, and the integration of the Chinese public personnel regime. In many ways, he emphasizes that the reach of Chinese public jobs is unique.

- First, unlike in mature democratic structures, where political parties and bureaucracy are distinct, the Chinese bureaucracy has two collateral stripes of authority: The Party and the government.
- Second, the Communist Youth League and the Women’s Federation were two of the Party’s social (or mass) organizations. Those who work for these organizations, but are not members of a self-governing civil society, are bureaucrats.
- Third, in China, not all government workers are paid by the government. It is possible to work for a bureau or an extra-bureaucracy without collecting budgeted funds, or just a portion of them, as payment. In these situations, the leasing unit must raise funds from sources other than budget funds to pay for the additional workers (Ang, 2012: 680–681).

There are around seventy million public employees in the PRC with over eight hundred million workforces. In China, the public personnel system operates in a single-party shadow because it is a form of party and government and it is different from other state systems.

6 NGOs/CIVIL SOCIETY CHINA

Over the last forty years, NGOs have played endorsing roles in lobbying defense, the surrender of welfare, and humanitarian aid (Edwards, 2020). Civil Society and NGOs have an important place in the Chinese government structure. However, different determinations are made in the literature on this subject. The NGO literature, according to Hsu and Hasmath, emphasizes that as NGOs age and “grow up,” they can begin to cultivate an appetite for new roles and functions. In general, they may want to participate in policymaking or concentrate on establishing transnational links to emphasize the importance of specific concerns. (Hsu & Hasmath, 2017: 23). In other words, NGOs seek collaboration with government agencies primarily to maintain public confidence (Farid & Song, 2020: 591).

The “Charity Law,” which established regulations for China’s domestic NGOs, called “social organizations” by the government, went into effect on September 1, 2016. In China, there are approximately 675,000 of these organizations registered, with estimates of the number of unregistered social organizations as high as 3 million (Corsetti, 2019). In comparison, the current Charity Law and proposed amendments to State Council rules make it easier

for a wide range of domestic non-governmental organizations to register and raise funds (Horsley, 2016).

According to the Law on the Administration of Overseas NGOs, which went into force on January 1, 2017, foreign NGOs must recognize a Chinese partner organization and register with the Ministry of Public Security (MPS) or its provincial-level equivalents before opening an office in mainland China (Kuhn, 2018). The Law on Overseas NGOs is generally seen as law limiting and narrowly regulating the work of global and international NGOs. In collaboration with the Center for Charity Law of the China Philanthropy Research Institute at Beijing Normal University, China Development Brief released “A Basic Guide to Overseas NGO Law” (CDB, 15. Dec. 2016). Just a few foreign NGOs were registered with the Ministry of Civil Affairs prior to the law’s passage 22. The majority of them worked in the gray areas. The recent legislation governing international non-governmental organizations (INGOs) has sparked heated diplomatic debate. It was seen as another restrictive law enacted in the framework of a set of other laws enacted between 2014 and 2016, including the Counter-terrorism Law, National Security Law, and Cyber security Law (Kuhn, 2018).

A point of great interest relating to both laws is the relatively ambiguous definitions of organizations that will be governed by the current regulations. The government unveiled plans to control private think tanks by including them in the same group as non-profit charitable groups in early May 2017. Previously, independent think tanks were not subject to any strict regulations, and their legal status was uncertain. Global universities’ offices in China that facilitate trade and research collaboration were not immediately exempted from registration, and others would need to make new administrative arrangements (Kuhn, 2018).

The growth of the NGO sector in China’s rapidly changing social landscape prompted scholarly interest in the existence of social organizations and their relationship to the state (Farid & Song, 2020: 591–592). Organic properties of the Chinese political system, such as mistrust of INGOs as catalysts of democratic revolution, often drive strategic adaptations centered on increasing state-INGOs cooperation (Noakes & Teets, 2020: 1098).

7 RECENT DEVELOPMENTS AFFECTING PUBLIC ADMINISTRATIVE STRUCTURE

The exponential growth of globalization, technological evolution and improvements in culture and the economy have accelerated public administration reforms around the world since the 1980s. With the influence of New Public Management, the development of models for changes in the administrative functions, methodology, organizational mechanisms, and autonomy led

to great push in administrative reforms. As other Asian countries, China makes reforms in public administration based on the need for internal transition and global competitiveness as well as critical dynamics for acceleration of social and economic modernization (Xu, 2006).

The CCP's relationship with the Internet has been characterized as a love-hate relationship. On one hand, the Internet is seen as a weapon for good governance; it enables officials to be more responsive and elevate the standard of services offered to the public; on the other hand, the Internet has never been ideal since its introduction. National and international information technology companies (such as Chinese social networking providers Sina Weibo and Tencent, or American corporations such as Microsoft or Yahoo) are systematically subjected to political and legal pressure to censor, filter, and regulate the growing flows of data exchanged through their services due to the Party's interests in the Internet (Navarria, 2017: 4). In this respect, it will be evaluated how much importance the Chinese People's Republic attaches to the reforms in public administration today, in terms of the Internet age formulation. It is also necessary to examine what reforms the People's Republic has planned for the future in the context of public administration.

7.1 *E-government in China*

The history of the Internet in China can be traced all the way back to the late 1980s. The State Education Commission launched its own network, the China Education and Research Network, or CERNET, in 1993. China's Government Online Project, which began in 1999, exemplified the Chinese Communist Party's (CCP) desire to establish an electronic government. The Chinese e-government project, which began in early 2004, indicated that ICT was being grafted onto an underdeveloped administrative framework (Xu, 2010).

The main goal of China's administrative transformation in the global economy is to move from a control-oriented to a service-oriented government. Throughout this transition, the impact of information and communication technology (ICT) and the advancement of e-government has had dramatic effects on the Chinese government's various organizations and individuals (Onder & saygılı, 2018). The spread of ICT would almost certainly lead to transaction convergence, process reengineering, and administrative transformation. After that, it will eventually form a prefecture that is more citizen-centric. By using e-government software, the Chinese government hopes to feed administrative changes by transforming government functions,

simplifying procedures, and increasing administrative accountability (Zang et al., 2015: 408).

It is clear that the current CIOs' value judgments about service remain at the lowest level of implication or in the value dimension. This means that, in terms of service, the government's most important responsibility is to provide basic services through its e-government system, such as information services that are easy to use, up-to-date, and reliable. In terms of operation, some higher-level main concerns, such as citizen interaction via an e-government system and a customer-oriented mentality, are not yet an urgent subject of caution for the Chinese government. The current orientation-maturity relationship of Chinese e-government can be summarized as three sensible connection schemes: organization integration, technology-interaction, and service-inclusion. It can be deduced that, in terms of impact on e-government building, the construction subject's attitude toward and understanding of organization foregoes technology and puts service well ahead of technology. As a result of such valuable decrees, the government would put in the greatest effort in the field of organization when building the e-government, with the least effort in technology and the least effort in operation.

7.2 *Basic Changes/Reforms Affecting Administrative Structure of China*

Existing research limited to Western societies assumes that representative democracies work well because public sentiment and public policy are inextricably linked. Incumbents respond to widespread public expectations, while the general public receives cues and impressions from the latest policy context, allowing them to change their preferences. Claiming that democratic societies function well as a result of this policy-opinion exchange means that autocratic regimes are essentially unresponsive to public demands when formulating policies. In China, policy implementation is a long process of trial and error, with public opinion polls being a more popular tool for developing and evaluating public policies (Stepan et al., 2016: 471).

Since its beginning, the PRC government has modernized its administrative system more than ten times. Reforms have been further accelerated up recently with the goal of transforming government functions and developing administrative performance. Besides modernizing China's agriculture, industry, science and technology, and military, the Chinese leaders have supported streamlines of the governance system and administrative capacity in recent years hence accepting the fifth modernization. Emphasis has been put on accelerating China's administrative reform by establishing a law-based and service-oriented government. Desires have been made by the leadership in order for boosting administrative reforms, modifying administrative methods

and increasing the credibility and performing of the government. The rule of law including building a government directed by law is likely to describe the direction of administrative reforms even further. Generally, some new trends in China's administrative reforms clearly are shown as making easy of governmental administrative approval duration, making shorter the excessive administrative powers, supporting plural governance, and recruitment the administrative litigation system (Ahmed, 2017).

The allocation of public management reform, according to Wang and Guo (2015: 985), revolves around the call to shift China toward good governance. First and foremost, the ultimate goal of China's democratic reform is to promote good governance rather than what Western social scientists refer to as democracy. Second, Yu's basic advice is liberal, as good government and civil society are two clefs for achieving good governance. Third, governance reform, which is a key component of China's democratic reform, has made significant progress. Yu's more "neutral" conceptions of governance and good governance allow for broad debates about the utility of governance reform without opening a democratic reform "Pandora's box" (Wang & Guo, 2015: 1002).

8 CONCLUSION

China is a country that has been a sleeping giant for many years, which can be studied with the state administration and its geographical, historical riches (Islam, [HYPERLINK "sps:refid::bib28|bib29"](#)). With its own authoritarian management style and the economic growth, it has achieved, it is a country that will find itself in search of more resources in the coming years. For example, birth control policies and single child policy abolished in 2016 are based on the fact that future generations will be older, and the Chinese government now has to deal with both economic and management goals.

The understanding of the single party dominated in China and the oppressive management conception that comes in this direction actually opens the window showing that the management of such a population and land size is not easy at all. Obviously, the necessity of having the Chinese Communist Party under the control of the freedoms given by the authoritarian administration and not giving sufficient freedom to other political views is not an acceptable governance mentality. Also, the authoritarian governance approach which does not give adequate freedom to other political views, and that these freedoms must be under the control of the Chinese Communist Party is not an acceptable governance mentality. Nonetheless the process of this understanding of governance cannot be fully explained, only because of the disintegration of the Soviet Union, under the fear that the country of the Chinese governments will be disintegrated in the context of autonomy.

The investigation of factors such as Confucianism motivating the Chinese people to adhere to the one-party rule, being a respected member of the party, and fear of returning to the former internal conflict should be one of the important research topics in the coming years. In this context, the increase in the number of active Khan ethnic origin, which has abandoned single child practice, and the increase in the informal population of other ethnic groups against this Khan ethnicity may lead to a change in the direction of social desires in the Chinese state system throughout the coming years. Especially, the growing population of Tibetan Hindu population causing problems between India and China; the repressive and assimilation policies in the Uyghur-Sincan region, which constantly communicate the worries of the Turkish and Muslim world, are increasing the reactions to the practices of the current single-party rule gradually.

By innovations in China trying to make the public personnel regime active in the eastern China region where the population is intensive. However, due to the shadow politics of the Chinese Communist Party in the autonomous governments where other ethnic minorities exist, new public administration reforms and electoral rights are not fully implemented. The fact that Chinese governments have technocratic roots has helped them to succeed in positioning the market-based economy. However, this rapid economic progress has brought about much ecological destruction. The eastern regions where the population of China is very dense are limited in terms of water resources and the available resources are at risk. In this context, the Chinese government's priorities in recent years are clean water resources where ethnic minorities live. There are water transmission projects in these areas, especially in areas where the population is concentrated, like the Beijing area. Moreover, since the regions with ethnic minority have oil, gold, coal, and other minerals, Chinese state governments can exert more pressure on these regions in order to provide economic growth. It is also the fact that, under these repression politics, the regions where the ethnic groups live are strategic regions that are doors for the PRC to open toward the West. All these pressure policies can make the Chinese government's reforms toward public administration dysfunctional.

As a result, if the settled political conception in China changes over time and it covers the whole country, the solution of the foreseeable problems for the future will be accelerated. For example, overcoming problems such as bureaucrats' workload and negative attitudes to the e-government, with the fear that the influence of the communist party will weaken, may help prevent the formation of the supposedly powerful Chinese state of the future. Further studies should focus on the most effective way for Chinese governments to investigate the possibility of ethnic minorities to prove themselves in the country's administration through public administration reforms (Table 1).

Table 1 China public administration systems

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Administrative history	Geopolitical situation	Strategic/ Yes (1840–1949)
	Colonial history	Yes (Empire/technocracy)
	Legacy of bureaucracy	Strong
	Centralized bureaucracy	Military dominant
	Role of military	Very conservative
	Political culture	Not participative
	Administrative culture	Moderate
	Professionalism	High
	Politicization of bureaucracy	Socialist
	Dominant state ideology	Written
Legal structure	Nature of constitution	1954 & After two intervening versions enacted in 1975 and 1978, the current Constitution was declared in 1982
	Origin of constitution	Yes
	Strong constitution	Yes
	Constitutional rigidity	Civil initiatives
	Created by	Civil initiative
	Revised by bureaucracy	Strong
	Administrative judiciary system	
Central government	State structure	Federal
	Government structure	Parliamentary
	Hierarchical structure	Strong
	Local extension agencies	Too many
	Central government	Yes & strong
	Coordinating mechanisms	Existence of coordinating internal and external structure
		Strong
Local government	Transparent financing system	Moderate
	Monitoring	Moderate
	Independent regulatory agencies	Not exist
	Financial autonomy	Moderate
	Political autonomy	Strong
	Council types	Council manager
	Mayors	Appointed
	Decision making bodies	Exist
	Central tutelage/monitoring	Exist & strong
	Subsidiarity principle	Exist
Intergovernmental relations	Decentralization type	Delegation
	Logic for Division of tasks	Political

(continued)

Table 1 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Public personnel system	Tutelage/monitoring	Strong
	Communication	Strong Formal
	Civil services	Career based
	Scope of civil services	%95 of civil services
CSOs/Civil society	Recruitment and promotion	Competitive political fair
	Nationwide exam	Exist
	Politicization in general	Strong
	Unionization	Strong
	Size of Civil Society	NGO membership (NGOs in China is estimated to exceed 500,000), %90 volunteering rates, % 11.81 of GDP of the World economy, employment rate % 60.4
	Institutionalization	Strong
	Partnership with the state	Strong
Reform philosophy	Political pressure/domination	Strong
	Major financial revenues	Government supports, donations, and fundraising activities, rents
	Supportive national culture	Strong
	Political regime & civil society relations	Strong
	Civil society	Prestigious
	Dominant reform paradigm	Governance reforms
	Policy Transfer	Policy adoption
E-government reforms	Not completed	
Artificial intelligence (AI) reforms	Exist	
Influence of international actors	UN, IHRO, OECD	
New reforms (5 years)	Transformation of the mode of governance in public departments, establishing a new administrative system to clarify the role of the state, improve the performance of civil services, and institutionalize management and accountability structures in order to improve service to the public, double-digit economic growth, more market-based lending rates, greater equity in access to a good education; enhanced quality of education; and better data and assessment measures	

Source Adapted and developed from Önder, M., & Zengin Ü. N. (2022). A framework for comparative analysis: Public administration across the globe. In M. Onder, I. N. Nyadera & M. N. Islam (Eds.), *The Palgrave handbook of comparative public administration: Concepts and cases*. Springer Nature Palgrave Macmillan

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Japan

Billy Agwanda and Prince Opoku

I INTRODUCTION

Japan is an archipelago comprising of approximately 7000 islands located off the Eastern coast of Asia. The country is ethnically homogeneous and by 2020, the country was inhabited by a total population of over 126 million people, or about 1.6% of the global population. Tokyo, the capital of Japan, is among the most populous cities in the world with an estimated 14 million inhabitants. Japan possesses a complex and ancient tradition, though, the impact of Western influence is evident in many facets of Japanese life (Jansen et al., 2021) and it is rated as one of the most literate states in the world. According to a report by the World Press Freedom (2020), Japan is considered a free state ranked 66th out of 180 countries and 20th out of 180 countries in

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2019 corruption index (Corruption Perception Index, 2020). Politically, it is a parliamentary monarchy in which the emperor is a ceremonial head of state who symbolizes the state and the unity of the people, and a parliamentary system that operates based on the principle of separation of powers. Japan is a unitary state with 47 administrative divisions—one metropolitan district (Tokyo), 2 urban prefectures (Kyoto and Osaka), 43 prefectures, and one district (Hokkaido). Japan has a vibrant economy and in 2020, was ranked as the world's third largest economy by nominal gross domestic product (GDP), and the fourth largest economy by purchasing power parity (PPP) after achieving remarkable growth in the latter part of the twentieth century following its devastation during World War II (Ito & Hoshi, 2020).

The scope of Japan's contemporary administration and the transformation in its function have created significant concerns on how to resolve the problem of achieving integrated functioning bureaucracy that is heavily influenced by Japanese tradition and modern democracy. Indeed, the modernization of the country has had a huge influence on its contemporary nature of public administration. Before the promulgation of the new constitutional dispensation in 1947, public bureaucracy was designed as a political function. However, the new Constitution brought about radical reforms in which bureaucrats were transformed from functioning as loyal servants of the emperor to servants of the public.

This chapter examines the historical development of the public administration in Japan (JPA), and its modern features. The chapter puts emphasis on the civil service and examines the nature of recruitment and the existing relationship between politicians and bureaucrats. While the chapter seeks to provide readers a strong introductory discourse to JPA system, it also attempts to demonstrate how the Japanese public bureaucracy continues to preserve itself despite the increasing influences of new public management systems generally associated with North America and Western Europe. Japan offers an excellent case for comparative studies as a result of its unique political, economic, and social elements which epitomize other advanced or industrialized countries, but with a strong foundation on non-Western liberal traditions.

2 ADMINISTRATIVE HISTORY OF JAPAN

The modern Japanese administrative system was born in the era of Meiji Restoration (1868) and has undergone three main stages of development. Notably, the first stage (Pre-modern Japan, 1867–1889), the second stage (Pre-war Japan, 1889–1945), and the third stage (Post-war Japan, 1945–present).

2.1 *Pre-Modern Japan (1867–1889)*

In 1868, Dakojan was established with the main purpose of substituting the previous feudal system in Japan. In this system, the emperor was supported

by three ministers. The Prime Minister was charged with overall responsibility of government affairs, the Minister of Left (*Sa Daijin*) acted as an advisor to Ordinances of the government, and the Minister of Right (*U Daijin*) was responsible for supervision of government ministries (Sims, 2019: 1). There were Councillors (*Sangi*) who were vested with decision-making power and assisted the two Daijins on matters concerning policies and their implementations. However, the power of the court was inferior to the executive power until the establishment of Supreme Court (*Daishin In*) in 1875.

A unique feature of this era was that no clear division of state power was made between the executive, legislative, and judiciary which existed side by side. Instead, all governmental business were limited by *Fukoku*, that is, the proclamation of the *Ditto*-akin to Imperial Ordinance, and there was absence of law in the modern democratic sense. The Imperial Ordinance barred all forms of criticism against the government and the existing Administrative Courts allowed people to bring lawsuits against administrative agencies, but with a slim chance receiving a fair judgment on the cases. The old social status of rigid feudal system was maintained as most government authorities were selected from the former *Samurai* (warrior) Class (Mizutani, 1993: 30). As a consequence, the government was placed above the people, and it maintained strong control of economic activities. Administrative activities were permeated by absolutism, and the most powerful ministry was the Home and Finance Ministries (Tsuji, 1982: 120).

In the civil service, a general-examination ordinance was established through the issuance of two ordinances in 1887 which extended civil service examinations for both *sonin* (high-ranking) and *hannin* (ordinary) officials in all agencies, ministries, and agencies of government. The *Koto Bunkan Shiken* (Higher Civil Service Examination) consisted compulsory examinations on finance, law, and economics, and an additional test in at least one of either logic, ethics, philosophy, or psychology. Due to the absence of a centralized personnel agency, the civil service examinations were devolved across each government agency and ministry that maintained independent personnel administration systems. However, graduates from Tokyo Imperial University enjoyed a privileged status and were exempted from taking civil service examinations.

2.2 *Pre-War Japan (1889–1945)*

The adoption of Meiji Constitution in 1889 created a limited monarchical practice modeled along the German system that separated officials from non-officials although with a comparatively stronger tendency toward centralization than Germany (Ginsberg, 2008: 55). The constitution created a bicameral Imperial House (Legislative Assembly) consisting of the House of Peers and House of Representatives, and a cabinet system. The courts, despite enjoying some level of independence, were nonetheless expected to make judgments in the name of the Emperor. Although division of powers existed between the

judicial, executive, and legislative organs of government, the collective power of the three organs was still vested in the Emperor (Wakabayashi, 1991: 25).

The extensive power of the Emperor was manifested for instance, in the Emperor's direct control and command of armed forces. The Imperial House lacked the power to discuss affairs of the military because it was the prerogative of the Emperor. Similarly, the power to make and approve budget and make laws without consulting the Imperial House was also vested in the emperor. Other issues regarding personnel and departments of government were not governed by laws passed by the Imperial House, rather, by Imperial Ordinance. As such, public administrators were often referred to as "the Emperor's Officials" and served under very strict regulations demanding loyalty to the Emperor (Sakamoto, 2001). Bureaucratic authority was explicitly attached to imperial prerogatives and the Emperor through Article 10 of the Meiji constitution was empowered to "determine the organization of the different branches of the administration and salaries of all civil servants and military officers, and appoints and dismisses the same" (Spaulding, 2015: 83).

During pre-war Japan, internal and external factors significantly shaped the nature of government bureaucracy. The transition into a modern form of government equipped with a new constitution, cabinet, bicameral parliament, and a bureaucracy founded on meritocracy reflected the attempts of the government to appease the growing internal forces that advocated for democracy, as well as an attempt of the government to reaffirm Western powers that Japan merited respect.

2.3 *Post-War Japan (1945–present)*

Japan emerged in post-World War II as one of the most affected states. Following an unconditional surrender and subsequent seven-year occupation by the Allied powers for the first time in its history, significant progress was achieved in the consolidation of democracy and reforms in the civil-service system. The adoption of a new constitution in 1947 laid the groundwork for extensive reforms that cut across all government organs (Masui, 2010). Government institutions and personnel underwent changes to reflect emerging trends in public governance such constitutionalism premised on the ideals and values of modern liberal democracy. The reforms instigated by the 1947 Constitution continue to remain operational to date.

Unlike in Meiji constitution, the 1947 constitution established supremacy of the legislative organ over that of the executive body, and executive legislation barred with the exception of "Delegated Legislation." The National Parliament (Diet) as a representative of the people, is empowered to discuss any business of government, and the Cabinet is collectively answerable to the Diet (Kawato & Kawachi, 2006). Other administrative organizations were also restructured. For example, the Ministries of Home Affairs, Navy, Munitions and Army, were removed from the list of government agencies and

replaced by two new ministries of Labour and Construction to meet new demands of the post-War era.

Another significant change in the administrative structure was the establishment of new agencies mandated with administrative management such as the Administrative Management Agency, Science and Technology Agency, the National Personnel Authority, and the Economic Planning Agency. These administrative agencies play a significant role in the integration of administration. The National Personnel Management Authority (independent commission) was established with the main objective of democratizing the old bureaucratic system, overseeing personnel administration, and ensuring impartiality in civil service appointment, and enhancing administrative effectiveness and efficiency. The local government system was also empowered with considerable autonomous powers. However, the weak financial status of the localities in Japan makes local administration financially dependent on national government.

In post-War era, one of the unique normative features that emerged in the civil service is the notion of collective responsibility that has been embedded in organizational ethos of public bureaucracy and is reflected in work ethics or values which emphasize on an individual's contribution to group, community, and national success. Although it is common that public administrators have a high sense of purpose and commitment to organizational goals, such administrative culture can have a negative impact on public bureaucracy. For instance, overemphasis on loyalty, obligation, and conformity can lead to a strong vertical and ministerial orientation, thereby making policy implementation and interagency coordination difficult as well as minimizing an individual's creativity (Rix, 1988: 55).

In pre-war Japan, religion played a key role in politics, but it has become far insignificant in the post-war period. In the past, religious ideology was paramount in Japanese administrative system because the Emperor's symbolism, imperialism, militarism, and nationalism were closely intertwined. However, after the loss in Second World War, religious doctrines were suppressed and many observers view religion as politically insignificant, or at most relegated to the far end of the political periphery in Japanese society (Toyoda & Tanaka, 2002: 269).

Public bureaucracy in Japan has historically been very instrumental in its political development. According to Inoki (1964: 229), "bureaucratic leadership" played a part in Japanese modernization because notwithstanding the propensity to "paternalism and flexibility" pre-war Japanese bureaucracy was far more receptive to the need for political change than was the military. Notably, there was a quest to protect state machinery from party influence, hence, the Emperor's control of bureaucracy and its separation from democratic control. While the Meiji government was originally composed of "intellectual aristocrats," it became an appointed and dynamic oligarchy, and the traditional bureaucratic influence was carried into post-war Japanese political system.

3 LEGAL STRUCTURE

The constitution of Japan is founded on three key principles consisting of sovereignty of the people, respect for fundamental human rights, and pacifism (Bessho, 2006). As a constitutional democracy, the political system also functions on the basis of the principle of separation of powers such that the official business of the government is divided between the executive, legislative, and the judicial organs with each branch controlling a separate set of personnel and agencies.

The modern Japanese legal system is a blend of common and civil law resulting from the voluntary adoption of European continental civil laws and the post-World War II imposition of common law in Japan. Several early Chinese legal codes were imported and adopted in social and economic conditions of Japan in the 7th and the eighth centuries. The “Chinese Confucian philosophy and system of ethics was introduced to Japan in the fourteenth century” (Luney, 1989: 129). The maiden constitution of Japan was promulgated in 1869 following the 1868 change of regime by the “semi-independent” barons. The new established administration replaced the Chinese traditional laws used in civil and criminal matters with a new framework of adopted foreign laws. This emerged out of the need for Japan to look beyond its territory for laws in order to effectively trade and deal with Western powers.

The German legal system although authoritarian in nature, appealed to the Japanese than the English laws which were considered to be too democratic to be adopted in the Japanese society. However, as far back as 1900, the Anglo-American had begun to influence the Japanese legal system. Notably, the 1923 Jury Law ushered the role of juries into criminal trials and the subsequent occupation of Japanese islands after World War II by the U.S marked the beginning of the influence of common law. But the institutions established under the American system of common law, were superficial on Japanese civil law. Consequently, this process radically altered some administrative and constitutional institutions. Other aspects of the law, for example, the Code of Civil Procedure adopted in 1890 remained untouched. Japan remained a civil law state despite the seven-year occupation by the Americans having profound influence on Japan’s legal institutions.

The *Meiji* constitution provided a framework for administrative jurisdiction based on the system of separation of judicial and administrative jurisdictions. Matters regarding administrative law, under this system could not, in principle, be settled in ordinary judicial courts. The administrative courts’ administrative control was limited as its jurisdiction was confined to certain administrative litigation. Under the 1947 constitution, the central bureaucracy has its “establishment law” (*setchi ho*) stipulating its jurisdictions. Bureaucrats act only after the law allows them to. The Administrative Court was abolished and replaced by a system of “judicial review.” Administrative litigations and other legal disputes were subject to the authority of the judicial courts.

Japanese legal structure comprises of five main types of courts, namely The Supreme Court, High Courts, Districts Courts, Family Courts, and Summary Courts. The whole judicial power is vested with the Supreme Court and other lower courts as are established by law (Tsuji, 2009: 190). The Supreme Court is the apex and final court of Japan and remains the only court mentioned in the constitution, whereas the other courts are established by ordinary legislation. It handles appeals (Jokoku appeals and special Kokoku appeals) filed against verdicts of the High Courts. The decision on final appeals and on appeals regarding judgment under procedural laws fall under the purview of the Supreme Court's jurisdiction. The court is composed of the Chief Justice (the head), appointed by the Emperor upon the nomination by the Cabinet. The Chief Justice and other fourteen Justices appointed by the Cabinet with the Emperor's confirmation constitute the Great Bench. The three Petty Benches with five Justices each adjudicate most cases, however, cases involving constitutional questions are transferred to the Great Bench for inquiry and adjudication.

Under the Supreme Court are eight High Courts located in Tokyo, Fukuoka, Nagoya, Takamatsu, Hiroshima, Osaka, Sapporo, and Sendai, with branch offices located at six locations and an Intellectual Property High Court. It is composed of a three-judge panel appointed by the Cabinet among the list of judges nominated by the Supreme Court for a ten-year term. Under the Court Administration law (Article 6), the court has jurisdiction over appeals "Jokoku appeals and special Kokoku appeals" filed against verdicts by the district courts, family courts, or summary courts. The 50 District Courts and 203 branches across Japan have jurisdictions over both civil and criminal cases with the exception of cases that falls specifically under the jurisdiction of other courts. Each district court has a "six *saiban-in* – lay judges" similar to a jury system—who are selected to form a panel together with three professional judges to handle certain more serious cases. The "*saiban-in* system" was introduced in 2009 (European Parliament, 2020: 4). District courts also have jurisdiction over appeals against summary court judgments and rulings in civil cases.

The Family Courts have two divisions, namely the Family and Juvenile Division. The former has jurisdiction over dispute concerning family as stipulated in the "law for adjudgment" of domestic relations and the latter with jurisdiction over all cases regarding juvenile protection provided in the Juvenile law. The court has 50 locations nationwide, with 203 branch offices and 77 local offices in locations. The Summary Court situated in 438 locations across Japan remain the most accessible court by average Japanese. The court has jurisdiction over civil cases valued up to ¥1 400 000 (±€11 500) and criminal cases with minor punishment. The court is always presided over by a single judge and lacks the power to impose heavy punishment or imprisonment.

The Japan's legal system is unique and vibrant as it combines both civil and common law systems that have been grafted onto a system based on customs and values which have held paramount importance in Japan for centuries. As

is true in so many other facets of their system, the Japanese have been incredibly successful in absorbing features of foreign legal systems without sacrificing their own indigenous values.

4 CENTRAL GOVERNMENT

Japan is a unitary state divided into forty-seven administrative prefectures and with a rigid constitution that establishes the basic structure and organizations of government. This structure is based on the post-World War II 1947 constitution that adopts democracy in a form of constitutional monarchy—a resemblance of the British model that retains its old Imperial family as the honorary titular head of state. In this institutional arrangement, Japan operates as a parliamentary system anchored on the principle of separation of powers. The constitution incorporates the local to the central government structure and secures autonomy of the local governments through the Local Autonomy Act of 1947 which regulates intergovernmental relations between the two levels of government (Muramatsu & Iqbal, 2001).

Under the 1947 constitutional framework, the Government of Japan (*Nihonkoku-Seifu* or *Nipponkoku-Seifu*) has an emperor (head of state), Prime Minister (head of government), the cabinet, comprising the ministers of state (executive branch of government), and the legislative branch (National Diet). The emperor is mandated with ceremonial functions and other roles such as the appointment of the prime minister following such a nomination by the Diet. The Chief Justice of the Supreme Court has jurisdiction over “acts in matters of state” as stated in the constitution along with the approval of cabinet, especially, convocation of the Diet’s sessions, cabinet treaties and orders, and dissolving the lower house (Gordon, 2003: 245).

The prime minister is selected from members of the National Diet (Lower Chamber-480; Upper Chamber-242 members). Notably, all the past and current prime ministers have been selected from the Lower Chamber, as a result of its superiority in the Legislative Assembly. The Cabinet is comprised of ministries and agencies, each headed by a Minister and a secretariat “*Kanbo*” charged with a wide arena of jurisdictions such as personnel, budget, and internal organization. The Prime Minister controls the government business and is charged with the appointment and dismissal of State Ministers (*Kokumu daijin*) who constitute the Cabinet. The 2001 reform strengthened the position of the Prime Minister by strengthening its political leadership over a strong traditional bureaucracy (The Cabinet Personnel Bureau, 2014). Under the leadership of the PM, the Cabinet designs plans and offers comprehensive coordination of the ministries regarding issues such as financial management, budget planning, economy, basic principles on external and national security policies, and administration. However, both the PM and the Cabinet are collectively responsible to the National Diet, which can adopt a non-confidence resolution and call for fresh elections (Hayao, 2014).

Japan’s National Administration is executed uniformly by the Cabinet (National Administrative Organization) and the various institutions established under it. With the Cabinet at the top, Ministries, Agencies, and public corporations work as a single institution to oversee the implementation of all state activities with the exception of judicial and legislative duties. Article 73 of the Constitution vests the executive and administrative powers to carry out the administration of law, conduct affairs of the state, conclude treaties, and administer the civil service. Additionally, the Cabinet is to prepare and submit the budget to the Diet, take decisions on general amnesty, special amnesty, and commute punishment, reprieve, and restore right. To implement these duties, Article 74 requires that Cabinet orders and all laws be appended by a competent Minister and countersigned by the Prime Minister. The PM is therefore charged under Article 72 to control and supervise all administrative offices. The central government also institutes advisory councils as a tool to secure information from experts in numerous fields to promote fairness of administration, adjust conflict of interest, or coordinate various areas of administration (Organization of Government of Japan, 2007) (Fig. 1).

Government ministries and other agencies exist within the Cabinet which is the most influential organ of Japan’s executive arm of government established by the National Government Organization Law. However, the Office of the Cabinet is the only administrative organ regarded at the Ministerial level. In Japan, there are eleven ministries, namely “Cabinet Office, Ministry of Internal Affairs and Communication, Ministry of Justice, Ministry of Treasury, Ministry of Education, Culture, Cabinet Secretariat and Reconstruction Agency, Sports and Science and Technology, Ministry of Health, Labour and Welfare, Ministry of Agriculture, Forestry and Fisheries, Ministry of Land,

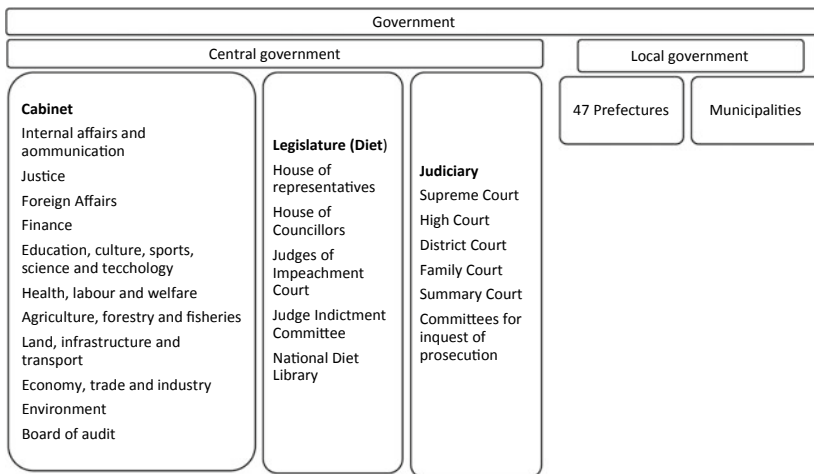


Fig. 1 Legal government structure in Japan. Source Authors’ analysis

Infrastructure, and Transport, Ministry of Environment, and the Ministry of Defence. Article 68(1) provides that “a majority of the ministers must be chosen from among the members of the Diet.” According to Clark (2013: 204), the “minister, senior vice minister (*fuku daijin*), and vice minister (*seimukan*)” constitute the political leadership of the ministry and the number of these posts differs according to the size and importance of a ministry. An administrative vice minister (*jimu jikan*) is the head of non-political (career) bureaucrats.

In addition to the ministries, there are incorporated administrative agencies referred to as Independent Administrative Corporations (*Dokuritsu gyōsei hōjin*) that are managed by the Basic Law on Reforming Government Ministries. These institutions were established as independent agencies based on the notion of dividing government ministries and agencies into planning and operating functions, respectively. The Corporations utilize private sector-management methods and are given autonomy on the management of their budgets and operations. Under the Act of General Rules for Incorporated Administrative Agencies, government ministries are deterred from intervening these independent agencies (Isozaki, 2007: 31). The independent agencies are originally established on the principle of dichotomizing the operations and functions planning of government’s agencies and ministries and include agencies such as the Japan Mint, Japan Aerospace Exploration Agency (Jaxa), and the National Printing Bureau (NPB).

5 LOCAL GOVERNMENT

Different countries operating under decentralized systems of governance often have varying systems and practices of local governance. In Japan, the local government structure was established under Chapter 8 of the 1947 constitution which recognized the central role played by local governments in entrenching democratic principles of governance. According to the Local Autonomy Law, Japan’s local government structure is comprised of a two-tier system made of prefectures that provide services for wider areas and municipalities that provide local services. Notably, unlike in the past when the local governments continued to be strongly influenced by the central government, for example, through the direct appointment of governors, their autonomy has significantly improved over the years.

As of 2021, there are 47 prefectures (divided into cities, towns, and villages), and this number has not changed since the Meiji Period (1868–1912). Under the Local Autonomy Law, the geographical areas of local authorities can change, however, it does not provide for any provision that can enable the establishment of a new authority where none previously existed or the abolishment of an existing authority such that the area under jurisdiction does not belong to any local government authority. On the other hand, the number of municipalities have significantly decreased since the end of World War II because of the merger of several towns and villages based on the Law of

Promotion of Merger of Towns and Villages and the Law Concerning Special Measures for the Merger of Municipalities in order to improve the administrative and financial capabilities of the administrative units. It is important to recognize that the size of the prefectures and municipalities vary extensively. In prefectures such as Tokyo, the population is approximately 13.92 million, while in Totori it is approximately 560 thousand as of 2019. The diversity in municipalities is even greater. In Yokohama-shi, the population is approximately 3.7 million, while in the small municipality of Aogashima-mura in Tokyo the population is just about 169 people as of 2020.

Although the local governments enjoy the right of autonomy, it does not mean that there are no relations with the central government. Indeed, Japan remains and operates as a unitary state and the local authorities are just but a part of the unified system of government. In many ways, the local and central governments are complementary at all levels of the three-tier system. What is emphasized in this complementary relationship is the minimum interference and conformity to the provisions of the law that safeguard autonomy of the local authorities.

6 CIVIL SERVICE

Within the central government, there exists an elite class of bureaucrats often referred to as *Kanryo* who are selected from a very competitive process through the national civil service examination and play a critical role in the management of government. A majority also opt to take other positions in the private sector after retirement as presidents or board members of high-ranking corporations.

The National Personnel Authority is mandated with the recruitment of civil service personnel by administering the screening exam that is not only impartial, but also competitive and is open to all individuals meeting the basic qualifications such as age limit. The Authority offers three types of exams (Level I, Level II, and Level III Examinations). The elite professional exams are administered as Class One and is the most competitive and subsequently most sought mainly because the public sector is more revered in Japan than the private sector given the advantages that public sector holds in terms of career development. The exam is classified into Social Sciences, Agriculture and Biosciences, and Science and Technology. Notably, the Social Sciences category is often the most important and is further subdivided into Economics, Jurisprudence, and Public Administration and it is those who succeed in this category that eventually attain the special status of *Kanryo*. Those who take examinations in Class Two and Three, become qualified for the non-career track and clerical non-professional positions in government. For those students who make it pass the examination screening but fail to gain employment in the central government, they may opt to take other exams for prefectural or municipal officials (Fig. 2).

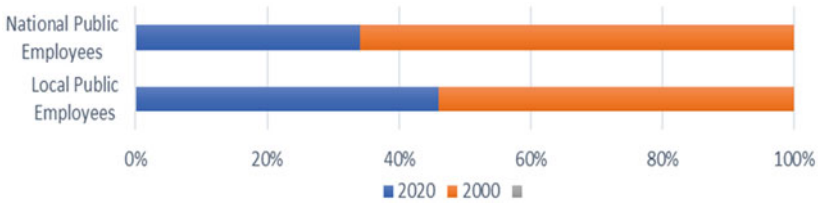


Fig. 2 Distribution of central and local government employees in 2000 and 2020 (*Source* Author analysis of national data from Japan Government Directory)

It is important to note that the National Personnel Agency does not conduct the final stage of the selection process. Interviews of candidates who have successfully undergone the examination process is relegated to the prerogative of the various government agencies and institutions who have the final mandate on decisions regarding hiring. Within the framework of the central government, specialized sections such as Department of General Affairs or Secretariat have a special focus on recruitment of new personnel (Table 1).

The various types of exams administered for employment in the public sector are designed to provide an assessment of the abilities, knowledge, and aptitude of applicants to be able to conduct their duties efficiently and effectively in the public service.

In Japan, public bureaucrats exercise significant influence in political leadership particularly in the processes of making public policies. This influence can be traced to the early post-war era in which the power to make policies and the expertise of Japanese bureaucrats was highlighted as one of the main drivers behind the rapid economic growth. According to Vogel (2013), capable bureaucratic leadership was one of the fundamental reasons why Japan emerged as the “world’s most effective industrial power.” However, this was until the 1990s asset collapse that led to a period of economic stagnation characterized by numerous government scandals that exposed public bureaucracy to intense criticisms and ultimately led to the onset of far-reaching reforms that meant to expand the power of the Prime Minister and the associated offices over the decisions-making processes of government.

During this period when the Liberal Democratic Party (LDP) was in power, government legislations were often drafted by the various administrative agencies, thereafter, approved by a unanimous decision of the Cabinet and forwarded to the Diet for action. However, in order to avoid potential delays within the Diet because of disagreements, the proposed bills would first be subjected to “prior review” which was designed as an extra-legal process to vet the drafts by the relevant LDP Policy Affairs Research Council and the LDP General Council before its final submission to the Diet. Consequently, unlike in other democratic states where a legislative bill would be subjected to a full review in parliament, politicians allied to the LDP made all the necessary changes and parliamentary deliberations became merely constituted of

Table 1 National public employee recruitment examinations conducted in FY 2017/18 by NPA

<i>Qualification</i>	<i>Type of examination</i>	<i>FY</i>	<i>No. of Applicants</i>		<i>No. of Successful candidates</i>			
			<i>Total</i>	<i>Female</i>	<i>Total</i>	<i>Female</i>		
University level graduate/graduate students	Examination for comprehensive service	Examination for graduate students (except legal division)	2018	2181	588	639	158	
			2017	2470	630	624	153	
		Examination for graduate students (legal division)	2018	22	3	11	2	
			2017	23	7	12	3	
		Examination for university level graduate (except liberal arts)	2018	17,428	6324	1158	330	
			2017	18,121	6591	1254	331	
		Examination for university graduate level (liberal arts)	2018	2928	1036	145	38	
	2017		2811	968	135	26		
		Examination for general service	2018	33,582	12,036	7782	2639	
			2017	35,142	12,391	7205	2435	
		Examination for specialists	Imperial guards (university graduate level)	2018	1476	350	72	15
			2017	1758	395	42	8	
		Ministry of Justice Specialists (human science)	2018	2366	887	475	228	
			2017	2525	915	346	139	
		Financial specialists	2018	3529	1224	526	180	
			2017	4297	1444	527	177	
		National taxation specialists	2018	15,884	5745	3479	1277	
			2017	17,168	5727	3341	1255	
		Food sanitation inspectors	2018	496	270	62	30	
			2017	513	294	67	36	
	Labor standards inspectors	2018	4045	1296	612	215		
		2017	3711	1132	478	147		
	Air traffic control officers	2018	1015	441	138	63		
		2017	1045	441	138	63		
	Examination for experienced personnel	2018	2921	708	353	84		
		2017	2636	631	342	75		

(continued)

Table 1 (continued)

<i>Qualification</i>	<i>Type of examination</i>	<i>FY</i>	<i>No. of Applicants</i>		<i>No. of Successful candidates</i>			
			<i>Total</i>	<i>Female</i>	<i>Total</i>	<i>Female</i>		
High school graduate level	Subtotal	2018	87,873	30,885	15,447	5258		
		2017	91,220	31,566	14,511	4848		
	Examination for general service	Examination for high school graduates	2018	15,455	4874	3289	1205	
			2017	13,958	4545	2690	962	
			Mid-career recruitment examination (entry level)	2018	402	68	16	4
				2017	449	69	18	1
		Examination for specialists	Imperial guards (high school graduate level)	2018	555	198	23	9
				2017	520	122	12	4
			Prison officers	2018	5027	1146	1009	222
				2017	5263	973	992	248
			Immigration control officers	2018	2072	558	185	52
				2017	2193	516	79	15
			Tax officers	2018	8011	2517	1496	576
				2017	8592	2488	1469	528
			Aeronautical safety college students	2018	663	241	106	34
				2017	666	241	102	29
			Meteorological college students	2018	418	87	32	2
				2017	404	105	44	6
			Japan coast guard academy students	2018	504	93	81	14
				2017	583	106	81	20
			Japan coast guard school students	2018	3650	547	892	98
				2017	3909	491	532	82
			Japan coast guard school students (special)	2018	5970	1570	1028	285
				2017	6513	1483	850	216
		Subtotal	2018	41,727	11,836	7857	2501	
			2017	43,050	11,111	6869	2111	
Total		2018	129,600	42,721	23,304	7759		
		2017	134,270	42,677	21,380	6959		

Source Author's analysis of national data

a skeleton process where opposition voices would be given a chance to only voice their objections before the bill is finally passed. The impact of this process is that it led to the emergence of relations between LDP politicians, industry groups, and government agencies. In this emerging relationship, high-level bureaucrats held a significant role by resolving any potential disagreements and building consensus, thereby enabling the bureaucrats to control the

process of policymaking (Ramseyer & Rosenbluth, 2009). But gradually, LDP and some LDP politicians became influenced by major corporations such that policy formulation processes became increasingly complex and highly contested especially when they attempted to represent the policy interests of big corporations.

As the economy expanded even further and matured, the negative impacts of the influence of LDP politicians in the formulation of public policies became more evident when the Prime Minister and the Cabinet could no longer make prompt decisions in circumstances that necessitated such, especially, during negotiations or coordination of cross-jurisdictional policies involving issues like climate change and protection of consumers. Reforms to consolidate government ministries and agencies, streamline administrative apparatus, and support the cabinet in its role of policymaking were thus introduced in 2001 after the National Public Service Ethics Act was passed in 1991 in the wake of scandals in the civil service. The changes involved the establishment of a merit-based personnel evaluation system which culminated with the enactment of the National Public Service Act in 2014 and its subsequent amendment to Cabinet Bureau of Personnel Affairs which manages all the national civil service executives in the Cabinet Secretariat pertaining to salaries, clerical affairs, Promotion of women's activities, and personnel evaluation.

7 SIZE OF JAPANESE GOVERNMENT

Comparatively to other governments across the OECD, the size of government in Japan is relatively small. This is reflected in the percentage of employed individuals discharging duties at the central level. Out of the total government employees, that is, drawn from the two tiers of government, approximately 14% discharge duties to the central government. These include public officers categorized as “special officers” who are cabinet ministers, ambassadors and Self-Defense Forces personnel, and other individuals attached to the category of general-purpose government affairs. The comparatively lower personnel attached to the central government is a strong indication of the extent of decentralization of public administration in the country. In Japan, sub-central government employees account for 85% of the total government employment (Fig. 3).

One of the fundamental reasons for the significantly higher number of individuals working under the central government personnel in countries such as Turkey, Israel, and Greece is because of the large size of their militaries. For Japan, the Renunciation of War clause established by the 1947 post-war Constitution has deterred Japan from establishing a large military. The SDF can only maintain 277,000 active military personnel, while young Japanese are also unwilling to undertake the grueling training associated with military recruitment. The size of Japanese military is a shadow contrast to that of other countries such as Turkey and the U.S which have approximately 700 thousand and 1.4 million active military personnel, respectively.

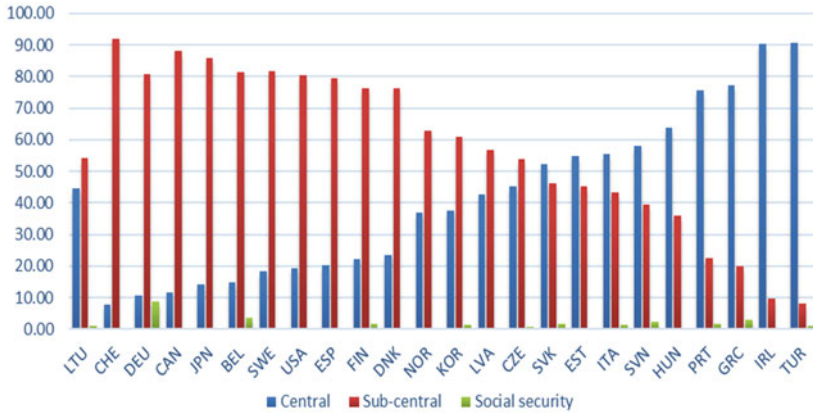


Fig. 3 Comparative distribution of OECD government employment across levels of government (%) (Source International Labour Organization (ILO), ILOSTAT (database), Public employment by sectors and sub-sectors of national accounts)

However, there are other arguments that have been put forward to explain the comparatively lower number of government personnel in Japan. First, the frequent use of part-time workers and the secondment of local government employees to the central government has contributed to the low number of individuals who are reflected in employment data as government employees. It is a common practice in Japan that a pool of workers work on part-time basis, but who similarly perform the same duties as regular government personnel. Moreover, the final tally of government workers does not also account for talented individuals seconded from the local governments to the central government institutions as assistants to national bureaucrats.

8 ELITISM AND A CULTURE OF NATIONAL MISSION AMONG YOUNG ELITE CIVIL SERVANTS

The central government is designed in a manner that the traditional orientation toward elite bureaucrats continues with every new cohort of personnel. Individuals who qualify as Class One personnel are often referred to as “bullet trains” because they tend to move up the bureaucratic chain very rapidly compared to their counterparts in Class Two and Class Three who largely perform the duty of assisting elite bureaucrats with policy decision-making processes. For the bureaucrats, the chances of moving beyond managerial positions in the public service is very minimal given the existence of a strong career discrimination in favor of Class One, who from the outset of their employment tend to receive preferential treatment as they are seen as the future leaders of the various government institutions and agencies. This preferential treatment of Class One personnel inculcates a very strong sense of national mission among the young bureaucrats. As a consequence, they spend more time in the

offices studying and working hard to absorb as much managerial know-how and experience and possible.

In many instances, the young bureaucrats are usually encouraged to come up with new policy drafts and submit them to the superiors with a real potential of ultimately translating into a new policy document after deliberations within the respective agency and subsequent submission to the Diet. In order to prove themselves as being different from the other personnel, the characteristically young and prospective bureaucrats usually form after-work study groups where they meet and discuss new ideas that can improve the public services offered by their respective agencies. According to Nakumara (2005), young elites work for long hours that would be very difficult without the influence of elitism and a sense of national mission.

However, this nature of elitism also facilitates the management of corruption and misconduct within the central bureaucracy. It is common across countries that corruption occurs among public officials. However, in Japan, most of the cases have involved misdemeanors and serious offenses such as gross misconduct and extreme embezzlement of funds are comparatively fewer (Fig. 4).

Specifically, violations by the Kanryo bureaucrats have been rare, and in the event that they are discovered and exposed, there is often an implosive effect on the public. In 2003, for instance, one of the broadly covered corruption cases involving the high-ranking bureaucrats in the central government concerned the officials from the Ministry of Finance who were treated to various forms of luxury such as playing in luxurious golf courses and parties in night clubs by bank executives for a period of over a year. Consequently, both the bank and the involved elite bureaucrats were criminally charged (Choi, 2007).

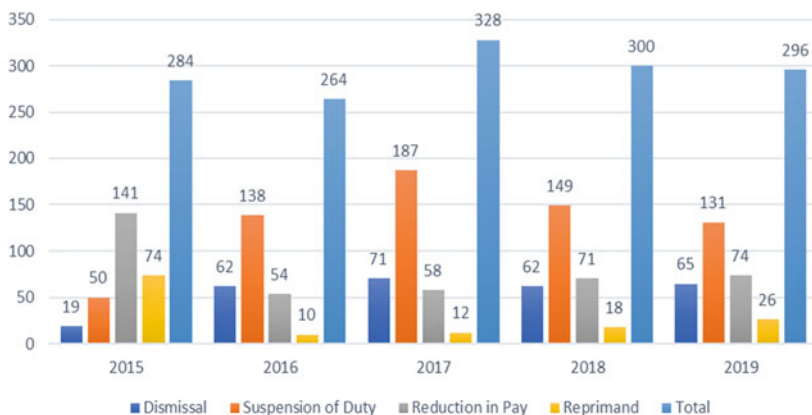


Fig. 4 Disciplinary actions between 2015–2019 (Source Author's analysis of data from Japan Government Directory)

9 E-GOVERNANCE IN JAPAN

E-governance has increasingly become a core component of public governance in many developed and developing countries as tools for enhancing administrative and legislative efficiency. In other words, as an emerging trend, e-governance has become a new measure for how open or democratic governments have become. In Japan, e-governance, in early 2000s, was identified as a solution to some of the pertinent socioeconomic challenges faced by the country. This vision has since transformed into one that seeks to transform Japan from a bureaucracy into an open e-government designed as a citizen-centered system, and perhaps also signify the intention of the country to establish itself as a true democracy.

In 2001, the first e-government development plan for Japan was initiated under the e-Japan Strategy which identified four key policy goals that included facilitation of e-commerce, developing e-government, nurturing high-quality human resource, and building an ultra high-speed network infrastructure (Sipior & Ward, 2009). This strategy yielded the output of several policy documents on IT which meant to transform Japan into a leading nation in networking. A subsequent e-Japan Strategy II was launched in 2003 to facilitate the development of one-stop administrative portal between the local and central governments. A review of the performance of the 2003 Strategy yet again resulted in another New IT Reform Strategy in 2010 that targeted 50% of applications to both the local and central governments to be processed online.

However, after ascending to the position of Prime Minister in 2012, Abe's administration took radical reforms to improve e-government services in Japan following his administration's "Declaration to be the World's most Advanced IT Nation." Toward this agenda, new legislative bills such as the "My Number System" were passed by the Cabinet to reform the vertical organizational obstacles and implement measures that could guarantee efficient and effective e-government services (Naing, 2019). Shared platforms such as Kasumigaseki Cloud provide a critical infrastructure that connects different ministries and agencies of the central government in a manner that not only streamlines their functions through information sharing, but also saves on operational expenses. At the local government level, the Local Government Wide Area Network also offers a platform through which information between prefectures, cities, towns, and villages is shared (Table 2).

Despite the improvement in the IT infrastructure and administrative system, the uptake of e-government services remains far below the existing capacity. A report released by the government in 2015 regarding the use of online administrative procedures highlighted that many of the several online services were not utilized and the 50% target set in the 2010 IT Strategy could not be met. The low consumption of e-government services has been attributed to the existence of a digital divide. In Japan, the number of individuals who

Table 2 Summary of key citizen-centered e-governance access points

<i>Access points</i>	<i>Function</i>
My Number and My Portal	Tool for administrative procedures related to social security, taxation, and disaster response. Citizens can check their own government information and oversee how these records are used by government agencies. My portal is used to check for these queries
My Post (e-PO Box)	A free service that allows citizens to receive important documents and information sent from government agencies and companies they chose over the Internet. Users are able to get bills and statements through email, make electronic payments, and archive records in the e-PO Box
Push Service	A notification system was developed by the government to approach users instead of waiting for them to make an application. Usually, the selected target individuals such as mothers are sent appropriate information on issues like free vaccination of children in local clinics
Convenience Stores	Kiosks where individuals can reserve tickets, wire money, and pay utilities

are 65 years old has been increasing in the past few years and consists approximately 28.8% of the national population. Out of this, 10 percent are involved in the national workforce. However, in a survey conducted on what could be improved to help senior citizens for re-employment, 41.9% of men and 33.8% of women highlighted that they needed to have training in computer skills. This is a pointer that a majority of the senior citizens are not properly equipped with the necessary digital skills that can increase their participation in e-government platforms.

10 NGOs/NON-PROFIT SECTOR

In the past, non-profit organizations (NPOs) were for a long time considered to be anti-government. However, this has recently changed especially after Japan's emergence from its developmental state era such that increasingly, these organizations are not just a fundamental source of private initiatives, but they also function as an integral part of the government. In 1995, a devastating earthquake—Kobe—mobilized approximately 1.3 million people in Japan to participate in rescue operations during the emergency (Aldrich, 2011). This perhaps marked the subsequent onset and sustained (re)thinking of the potential roles of non-profit organizations (NPOs) in public service activities. Indeed, the emerging debate at the time, influenced the National Diet to pass the Law for Promotion of Specific Non-profit activities (the NPO Law) in 1998 which covers how NPOs can be established, their dimensions, and activities.

Collectively, the expanding role of NPOs in Japan can generally be attributed to the initiative of private individuals who identify fundamental social needs and take actions to resolve the gaps emerging from those needs within their immediate environment. However, in as much as these organizations are able to intervene and meet certain public needs, they do so while largely maintaining independence from the formal departments of the state. NPOs have become a key component of the state administration by being involved in the delivery of certain services that are specific to them albeit with minimal coordination with both the local and central governments as it is the case in other countries such as United Kingdom.

A study by Takao (2001) on the emergence of non-profit sector in the public administrative structure of Japan, proposes the need for the sector to undergo an institutionalization process in order to enhance and promote its initiatives, encourage accountability, and enable the sector to attract greater manpower and know-how. Additionally, the limited sources of financial revenues for the sector is increasingly pushing NPOs toward more cooperative relationship with commercial enterprises, local and central governments. This is largely because outside the revenues obtained as subscription fees from members, internal financial revenues have not increased with the expansion of the sector and its role in public administrative activities. However, despite the financial aid from either the central or local governments, they have also strived to maintain their independence, and this can be deduced from how the organizations are established mainly from private initiatives rather than the traditional grassroot organizations such as *buraku*.

11 ADMINISTRATIVE REFORMS

Modern Japan has undergone several periods of administrative reforms starting with the era of Allied Occupation after World War II. According to Masujima (2006), administrative reforms during this period was characterized by top-down processes largely driven by Allied policy. However, more substantive reforms were undertaken during the second era of Allied occupation but in which, reforms were an outcome of Japanese-led initiatives. Since 1960s, several *shingikai* (deliberation councils) have been formed by the government to discuss issues of administrative reforms such as deregulation, fiscal reconstruction, reforms of special corporations, decentralization, and reform of the government employment system (Table 3).

The dominant administrative reforms since the 1990s are the deregulatory reforms. Since the establishment of the Deregulation Action Plan, significant steps have been achieved in important sectors, particularly in digitalization. This can be attributed to the nature and structure of Japan's economy which is driven by digital technology. As a consequence, the government has had to keep these reforms on a rolling basis to meet the new needs of the economic environment. Regulations and policies that previously served to protect and

Table 3 Key administrative reforms in Japan

<i>Nature</i>	<i>Reform</i>	<i>Objective</i>
Administrative management	Rinchō I (1961–64)	To make the institutions of public administration operate more efficiently, effectively, and economically
Fiscal reconstruction	Rinchō II (1981–1983) Gyōkakushin I (1983–1986)	Reforms in fields such as social security, agriculture, public works, and education in order to reduce government expenditure
Deregulation	Gyōkakushin II (1987–1990)	Adjustment of the economic structure
Deregulation	Gyōkakushin III (1990–1993)	Eliminating permissions and approvals-related tasks no longer required due to socioeconomic changes in Japan by targeting key sectors such as land and housing, distribution, agriculture, imports, and information and communications Regulations were minimized based on the philosophy of “free in principle” in economic deregulation and “personal responsibility” in social regulation
Reform of special corporations	Administrative reform framework (2000)	Conversion of special corporations to incorporated administrative agencies, their abolition and privatization
Decentralization	Decentralization Reform Promotion Council (2001)	To reform the allocation of resources including the allocation of government subsidies, central government tax revenues allocated to local governments, and the transfer of tax revenue sources in an integrated manner
Decision-making mechanisms	Judicial Reform Promotion Headquarters (2001)	The transition of dispute resolution from administrative guidance to legal resolution
Government employment system	Plan for the Civil Service Reform (2001)	Introduce a system of rating government employees according to ability and skills Establish appropriate rules on re-employment, including by special corporations, a system of approval for re-employment by commercial enterprises, and a code of conduct Introduce measures to safeguard access to additional and variety of human resources by revising the recruitment examination system, hiring of government employees from the private sector, and actively adopting open recruitment methods

nurture domestic industries have become counter-productive and largely obsolete. However, whereas this has emerged out of the realities of the global economic structures, several businesses that were once protected by regulations are increasingly feeling threatened. This makes the ongoing deregulatory reforms, an important economic and political issue.

12 CONCLUSION

The transition from the Meiji Constitution to the 1947 Constitution transferred the bureaucracy in Japan from a highly centralized bureaucracy to a democratic civil service with a stronger institutional relationship between politicians and bureaucrats. However, within the context of this relationship, it is the bureaucrats who have the strongest influence because of the higher dependency of the Diet on central government bureaucrats in policy formulation processes. To a large extent, the role of the Diet in policy formulation remains as that of “rubber stamps” by merely passing legislative bills. As such, given the limited influence of politicians in the processes of policy formulation, the relationship in the public administration system can be characterized as a bottom-up relation.

Notably, the traditional administrative culture of the pre-war era remains relatively unchanged as well as other aspects such as recruitment and promotion of personnel. But perhaps more importantly, the administrative management of Japan continues to lay strict emphasis on a ranking system in which public personnel must understand and embrace their roles within the strict guidelines established in the vertical organizational structure to be able to gain benefits such as promotions. In other words, the system of official ranking is not only harsh on the activities of personnel, but also establishes a strict informal order in which the relations between senior and junior personnel are complex by involving both informal social connections and formal business relations.

Regardless of the significant transformation of the public administration system in Japan, this chapter identifies two important issues that warrant further research. First, given the extent of departmental fragmentation including issues such as formulation of policy, there is a need to establish how they can be integrated. The character of the modern state in which the roles of governments and pressure from interest groups continue to rise, it is important that government is able to unify the activities of each state ministry with government policy. Secondly, just like in other countries, it is difficult to divorce bureaucracy from politics (Nyadera & Islam, 2020; Islam, Bingöl, & Nyadera, 2020; Islam, Bingöl, Nyadera, & Dagba, 2021). However, in Japan, the bureaucratic influence in politics appears to play a greater role in policy formulation including those that are ultimately translated into laws. As such, further studies can be made on the extent of bureaucratic influence on democracy in Japan (Table 4).

Table 4 Summary of the main features of Japan's public administration

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Administrative History	Geopolitical situation	Strategic
	Colonial history	Yes
	Legacy of bureaucracy	Yes (Empire)
	Centralized bureaucracy	Strong
	Role of military	Military influence
	Political culture	Conservative
	Administrative culture	Very participative
	Professionalism	High
	Politicization of bureaucracy	Moderate
	Dominant state ideology	Secular
Legal Structure	Nature of constitution	Written
	Origin of constitution	3rd May 1947
	Strong constitution	Yes
	Constitutional rigidity	Yes
	Created by	Civil initiatives
	Revised by bureaucracy	Civil initiative
	Administrative judiciary system	Strong
Central Government	State structure	Unitary
	Government structure	Parliamentary
	Hierarchical structure	Strong
	Local extension agencies	Limited to main areas
	Central government	Yes & strong
	Coordinating mechanisms	Existence of coordinating internal and external structure/agencies
	Transparent financing system	Strong
	Monitoring	Strong
	Independent regulatory Agencies	Exist
	Local Governments	Financial autonomy
Political autonomy		Moderate
Council types		Council mayor
Mayors		Elected
Decision making bodies		Exist
Central tutelage/monitoring		Exist & strong
Subsidiarity principle		Exist
Decentralization type		Deconcentration
Intergovernmental Relations	Logic for Division of tasks	Fair and rational
	Tutelage/monitoring	Moderate
	Communication	Formal

(continued)

Table 4 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Public Personnel System	Civil services	Career based
	Scope of civil services	% of civil services
	Recruitment and promotion	Competitive
	Nationwide exam	Exist
	Politicization in general	Weak
CSOs/Civil Society	Unionization	Weak
	Size of Civil Society	NGO membership, volunteering rates
	Institutionalization	Strong
	Partnership with the state	Weak
	Political pressure/domination	Strong
	Major financial revenues	Membership fees, donations, and fundraising
	Supportive national culture	Moderate
	Political regime & civil society relations	Moderate
	Civil society	Prestigious
	Reform Philosophy	Dominant reform paradigm
	Policy Transfer	Policy adaptation
	E-government reforms	Completed
	Artificial intelligence (AI) reforms	Exist
	Influence of international actors	...
	New reforms (5 years)	...

Source Adapted and developed from Önder, M., & Zengin Ü. N. (2022). A framework for comparative analysis: Public administration across the globe. In M. Onder, I. N. Nyadera, & M. N. Islam (Eds.), *The Palgrave handbook of comparative public administration: Concepts and cases*. Palgrave Macmillan

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Malaysia

Abdurrahman Güner

I INTRODUCTION

Malaysia's public administration system deserves closer observation for some reasons. First, Malaysia had been a colony of different countries for a very long time. It was ruled, respectively, as Portuguese, Dutch, and British colonies for more than 400 years. Second, Malaysia is a multicultural country. Along with Malays, Chinese and Indians also make up a significant portion of the population. As a natural result of this, many different cultures and religious practices live together in Malaysia. Finally, Malaysia has a unique procedure for the election of the head of state. Malaysia was formed by many different kingdoms coming together. The head of state is chosen among the kings according to the rotation method.

The Country's estimated population is 32.7 million people as of 2020 (Department of Statistics Malaysia [DSM], 2020). The percentage of ethnic composition among the population is as follows: 69.6% Malays (or ethnic Bumiputera), 22.6% Chinese, 6.8% Indians, and 1% others. Parallel to this ethnic disintegration, the country's major religions are Islam, Buddhism, Christianity, and Hinduism. Therefore, Malaysia has a multicultural and multi-religious demographic structure.

Malaysia's gross domestic product for 2019 was nearly 365 billion American dollars and the per capita national income was 11,414 American dollars (The World Bank, 2020). For 2020, the unemployment rate is around 5%

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(DSM, 2020) and the inflation rate is lower than one percent (The World Bank, 2020).

It is believed that the ancestors of the Malays migrated from southern China to today's Malaysia around the eleventh century BCE (Hooker, 2003: 35; Mence, 2005: 3). The region had been ruled by the Srivijaya Kingdom until the fourteenth century, with the support of China. However, traces of modern history of today's Malaysia extend to the founding of the Sultanate of Malacca, with the first half of the fifteenth century (Library of Congress, 2006: 2). In the fifteenth century, the port of Malacca became an important commercial center (Mence, 2005: 3). Intense commercial relations with Islamic countries in this period led the Sultanate of Malacca to convert to Islam.

However, from the sixteenth century to the declaration of independence in 1957, Malaysia remained under the rule of different countries. First, the Portuguese conquered Malacca in 1511 (Hooker, 2003: 73; Mence, 2005: 3). In 1641, the Dutch defeated the Portuguese, and the dominance of the Dutch followed the 130-year-old Portuguese colonial period in the region (Library of Congress, 2006: 2). At the beginning of the nineteenth century, the rule of the region was seized by the British. British dominance lasted until World War II, when the Japanese invaded the region in 1941. British rule was reintroduced in 1945, and finally, on August 31, 1957, the Federation of Malaysia became independent. The Federation of Malaysia, including Singapore, was founded on 16 September 1963. In 1965, however, Singapore left the Federation and became an independent state.

2 ADMINISTRATIVE HISTORY AND CONSTITUTIONAL FRAMEWORK

This section covers administrative history of Malaysia including the Malacca Sultanate era, the British colonial period, post-independence era, and the constitutional framework of the country.

2.1 *The Malacca Sultanate Era*

The Malacca Sultanate was ruled by the absolute monarchy. Therefore, the Sultan was the highest authority of the land. However, there were four basic ministries to assist the Sultan. Those were *Bendahara* (the chief executive of the Sultan), *Temenggung* (the head of legal matters), *Laksamana* (admiral), and *Penghulu Bendahari* (treasurer) (Hooker, 2003: 66). On the other hand, the Sultan's supreme position did not allow him to act arbitrarily. Below the Sultan, there was a kind of council or assembly (*mesyuarat bicara*) including nobles whose titles came from either their territorial holdings or an association with the royal family. Important issues concerning the public were discussed here and the decisions were taken by consensus (*muafakat*). Although this Council did not bind the will of the Sultan, it was heard and paid attention by him (Andaya & Andaya, 1982: 46–47).

2.2 *The British Colonization Era*

In 1824, as a result of the agreement between the Dutch and the British, Malaysia remained in the hands of the British (Andaya & Andaya, 1982: 122). By the end of the 1910s, three separate types of administrative entities were created by the British in the region: the Straits Settlements (Singapore, Malacca and Penang), the Federated Malay States (FMS) (Pahang, Selangor, Perak, and Negeri Sembilan), and the Un-federated Malay States (UMS) (Trengganu, Kedah, Kelantan, Perlis and Johor). The Crown directly governed the Settlements, while the others accepted British administrators with keeping their sovereignty (Yaakop, 2014: 57). Yaakop states that, in the FMS and UMS, senior positions were held by the British personnel, while the religious, cultural and traditional matters were governed by the Malay rulers (2014: 57). Andaya and Andaya observe the British approach to Malaysia as follows.

Once the British had succeeded in becoming the paramount power in the Malay Peninsula, they continued a policy of ‘conciliation’ with the Malay rulers and of ‘minimum interference’ with the Malay peasantry. In keeping with their espoused intention of ‘advising’ the rulers and ‘assisting’ them to govern their realms, the British went about their business with utmost circumspection. Yet they could never ignore a basic consideration which had led to their presence in the peninsula: the maintenance of law and order so that British commercial interests would be able to exploit the area’s wealth. Towards this end the British created a political and administrative machinery to mobilize the resources of the country. (1982: 205)

During the British colonial period, the British tried to replace the traditional Malay style of management with a western style of administration in order to maximize their own interest (Andaya & Andaya, 1982: 208). The British had removed nearly all-feudal practices by the 1890s (Noh, 2010: 12).

In the beginning of the 1900s, the idea of merging all civil services under a single administration arose. For this purpose, the Malayan Civil Service (MCS) was formally established in 1920 (“The Malayan Civil Service”, 2002: paragraph 4). The MCS was the organization that the British created to govern the peninsula.

The British colonial policy is regarded as the most important reason for ethnic pluralism in Malaysia (Chin, 2011: 143; Moten, 2011: 41). In order to provide a cheap labor force for exploiting the tin mines and plantation, the British launched a massive wave of migration from China and India to the region (Chin, 2011: 143; Moten, 2011: 42). In the British administration, the Indians were mostly employed in plantation, while the Chinese were more engaged in commerce (Haque, 2003: 244, Moten, 2011: 42). On the other hand, Malays labored in agriculture and public service missions, such as the civil service, the police, and the military. Those missions were not preferred and attracted by non-Malays, since other activities made more money (Moten, 2011: 42). Therefore, the Malays dominated the public sector.

In addition to this, in order to facilitate their colonial rule in the region, the British took care to ensure that the administration was in the hands of the Malays (Haque, 2003: 244). Thus, the British wanted to prevent the problems that might arise from economic differences among ethnicities and gave the message to the Malays that they were the real owners of the country. As part of this policy, the Malay Administrative Service (MAS) was established in the 1930s (Chin, 2011: 143). Chin's observation on the Malay Administrative Service (MAS) is as follows:

The MAS was junior to the MCS. Those few Malays who did manage to move from the MAS to MCS ended up as junior MCS officers. Thus, the first group of Malays actively recruited to the MAS tended to be members of the Malay aristocracy and children of Malay chiefs. Many were sent to study at the elite Malay College Kuala Kangsar (MCKK) established in 1905. One writer observed that the MCKK was for "the training of Malays boys for admission to certain branches of government service. (2011: 143)

After the Second World War, the British wanted to establish a Malayan Union where the entire peninsula was to be unified and administered by them. The Malayan Union plan was announced in 1945. However, claiming "*the sovereignty of the Malay Rulers, the autonomy of the Malay states and the privileged position of the Malay community were demolished*" (Yaakop, 2014: 61), the Malays opposed the idea of Union and requested a Federation. Finally, in 1948, the British agreed in establishing a federation protecting the Malay privileges. The Federation of Malaya is considered as the real basis of the current Malaysia (Mat Yazid, 2014: 75).

2.3 *The Post-Independence Era*

Tunku Abdul Rahman, the first Prime Minister of Malaysia, led independence talks with the United Kingdom. In the negotiation process, Tunku Abdul Rahman represented the alliance of the three ethnic groups' major parties: United Malays National Organisation (UMNO), the Malayan Chinese Association (MCA), and the Malayan Indian Congress (MIC) (Chin, 2011: 143).

After gaining independence, Malaysia entered a period of administrative reforms and reconstruction processes in order to respond to the newly born Federation's needs. The emphasis of the 1960s was on development planning (Bin Hussain, 1997: 104; Tjiptoherijanto, 2012: 2). In 1965, the government obtained the Ford Foundation's assistance to produce a road map for the administrative reform process. Based on this assistance, the Montgomery-Esman Report was prepared. In the light of this report, in 1966, the Development Administration Unit (DAU) was founded (Bin Hussain, 1997: 104; Tjiptoherijanto, 2012: 2). The aim of DAU was to plan and guide the reform efforts in the public service (Tjiptoherijanto, 2012: 2).

The ethnic tension in 1969 marked the 1970s. According to the results of the 1969 May general elections, the ruling Alliance Party, comprised of the United Malays National Organisation (UMNO), the Malayan Chinese Association (MCA), and the Malayan Indian Congress, under the leadership of Tunku Abdul Rahman, lost power, while the Chinese-dominated opposition parties having campaigned against Article 153 of the Constitution (Malays' special rights) gained significant support. Even though the Alliance Party won the election, the Malays could not overcome the fear that they would lose their control of the country (Mauzy, 2006: 57). This situation led to racial riots on 13 May 1969, in which nearly 200 people were killed. Following this, the King of Malaysia (Sultan Ismail Nasiruddin Shah) proclaimed a state of emergency and suspended the Parliament.

The special rights of Malays are specified in Article 153 of the Constitution. According to the Article, the King should take necessary measures to ensure that Malays have a certain proportion *deemed reasonable in the public service, scholarships, exhibitions and other educational or training privileges and permits or licenses for the operation of trade or business*. Pursuant to Mauzy, *since the Malays were the most feudalistic, least educated, least urbanized, and least economically advanced community in the country*, the aim of these "special rights" is to close the socio-economic gap between the Malays and the non-Malays (especially the Chinese) (Mauzy, 2006: 54). However, Haque states that these special rights granted to Malays have always been the main cause of dissatisfaction between Malays and non-Malays in society (2003: 245).

After the riots, the government adopted the New Economic Policy (1971–1990), by which the Malays' special rights expanded in wider areas such as investment and capital ownership (Haque, 2003: 245). One of the most noticeable aims of New Economic Policy was to make sure that the Malays would control at least 30% of the economy by 1990 (Mauzy, 2006: 58). Since the beginning of the New Economic Policy until now, the Malay rate in public officials has reached about 80% from 60% (Chin, 2011: 146).

After the 1980s, the tendency toward the application of Islamic values to the public sphere intensified (Lee, 2017: 136). In 1982, the fourth Prime Minister Mahathir Muhammad announced the Look East policy to get rid of absorbed Western values (Sani et al., 2009: 111). In line with this vision, Mahathir initiated the Infusion of Islamic Values Policy in order to adapt Islamic values, such as *trustworthiness (Amanah)*, *responsible (Tanggungjawab)*, *sincerity (Ikhlas)*, *dedication (Dedikasi)*, *moderation (Sederhana)*, *steadfast (Tekun)*, *honest (Bersih)*, *disciplined (Berdisiplin)*, *collaborative (Bekerjasama)*, *virtuous (Berbudi Mulia)*, and *grateful (Bersyukur)*, to the Malaysian public administration in 1985 (Chin, 2011: 151; Othman et al., 2014: 40). Following the Mahathir's period, this policy was adhered to during the fifth and sixth Prime Ministers. The fifth Prime Minister Abdullah Badawi introduced a new approach into public policy called *Islam Hadhari* (Civilizational Islam). The sixth Prime Minister Najib Abdul Razak kept this approach under the name of *Wasatiyyah* (intermediate or middle). The main goals of

Islam Hadhari and Wasatiyyah were to ensure that Malay Muslims experience Islamic civilization in a moderate way and to prevent them to tend radical-jihadist Islamic movements (Sani et al., 2009: 111).

2.4 *Constitutional Framework*

Located in Southeast Asia, Malaysia is a federal constitutional monarchy consisting of thirteen states and three federal territories (Kuala Lumpur, Labuan, and Putrajaya). Eleven states (Terengganu, Selangor, Penang, Perlis, Perak, Pahang, Negeri Sembilan, Malacca, Kelantan, Kedah, and Johor) are located on the Malaysian Peninsula while two states (Sarawak and Sabah) are located in the Borneo Island. The capital city of the country is Kuala Lumpur. The government consists of legislative, executive and judicial authorities. The system of the government is a parliamentary system which the Westminster parliamentary system has heavily influenced. The Head of State, called Yang di-Pertuan Agong (the King of Malaysia), exercises the executive power, and the Cabinet is led by the Prime Minister.

Malaysia has a bicameral parliament. The Parliament consists of the Dewan Negara (Senate) and the Dewan Rakyat (House of Representatives). The Senate consists of 70 members. Twenty-six of the members are elected by state legislative assemblies (each state elects two senators), while the rest of the members are appointed by the King on the Prime Minister's advice. The tenure of the office is three years. A member of the Senate can be elected for a maximum of two terms. The House of Representatives, on the other hand, has 222 members, who are elected by a general election held every five years. The party having the majority of the votes in the House of Representatives forms the Cabinet. A bill shall be passed by both Houses and assented by the King in order to become a law.

Malaysia has two court systems: the Syariah court system and the civil court system. According to the Constitution, there is no jurisdiction of civil courts over the Syariah courts. Syariah courts decide on Islamic law questions, while other courts handle other civil and criminal matters. Malaysia, which was subject to the common law tradition as a result of its long stay under British rule, does not have a specialized administrative jurisdiction apart from the general courts.

Article 3 of the Constitution declares that "*Islam is the religion of the Federation.*" Similarly, Article 160 states that Islam is part of the Malay identity. Moreover, some privileges are granted to the Islamic religion by the Constitution. For example, Article 12 gives freedom to all religious communities to open their own schools. But the same Article states that the Federation or state cannot establish religious educational institutions except Islamic institutions. However, the Constitution does not prohibit other religions. Article 3 rules that "*other religions may be practiced in peace and harmony in any part of the Federation.*"

In his memoir, Tunku Abdul Rahman, the first Prime Minister of Malaysia, stated that “*Malaysia is a secular State, it has its official religion, Islam*” (Shuib et al., 2012: 5). However, in 2001, the Prime Minister Mahathir Muhammad declared, “*Malaysia is an Islamic state*” (Lee, 2017: 136; Leigh & Lip, 2004: 308; Rosdi & Shafie, 2016: 1). Later on, Abdullah Badawi, the fifth Prime Minister, maintained the same statement and declared that, “*Malaysia is an Islamic state, but not a secular or theocratic state*” (Sani, 2009: 106). In his opinion, Malaysia is a country where Islamic rules and democratic rules are applied together (Sani, 2009: 107). It is beyond this study’s scope to argue whether Malaysia is an Islamic-theocratic state or a secular democratic state. However, it is clear that Islam has always played a central role in Malaysian political life.

3 CENTRAL GOVERNMENT

Malaysia has a federal government system. Therefore, Malaysia’s public administration is organized at both federal and state levels. Malaysia is governed by a parliamentary monarchy. In this system, Yang di-Pertuan Agong (King of Malaysia) represents the head of the Federation while the Prime Minister is the head of the government.

3.1 *The Head of State*

Yang di-Pertuan Agong’s tenure is five years. He is chosen based on the rotation principle among nine Sultans at the Conference of Rulers (Majlis Raja-raja). The authority of removing him from the office is also vested in the Conference of Rulers. The Conference of Rulers elects a Deputy Supreme Head of Federation (Timbalan Yang di-Pertuan Agong) to represent Yang di-Pertuan Agong in the absence of him.

The King has legislative, executive, and judicial duties. However, similar to the British system, his authorities are largely symbolic and ceremonial. While most of his executive authorities are non-discretionary powers and generally exercised based on the advice of the Cabinet or a minister, he has some discretionary powers as well. The actual power of the executive is given to the Cabinet by the Constitution.

The King is the Supreme Commander of the armed forces of the Federation and the Head of Islam in the four states ruled by appointed Governors instead of Sultans, in the Federal Territories, and in his own state. Yang di-Pertuan Agong cannot exercise his function as a Ruler of his state during his term as the King of Malaysia, except to be the Head of Islam.

Article 40 of the Constitution declares that Yang di-Pertuan Agong has discretionary power only in the following situations: (a) the appointment of a Prime Minister, (b) the withholding of consent to a request for the dissolution of Parliament, (c) the requisition of a meeting of the Conference of Rulers concerned solely with the privileges, position, honors and dignities of

Their Royal Highnesses, and any action at such a meeting, and in any other case mentioned in this Constitution. On the other hand, the executive powers of the King based on advice are not organized in a single article of the Constitution. Some of those powers are as follows: (a) To appoint Auditor General on the advice of the Prime Minister after consultation with the Conference of Rulers (Article 105), (b) to appoint ministers and deputy ministers on the advice of the Prime Minister (Article 43 and 43a), (c) to appoint representatives of each state to the National Land Council (Article 91), (d) proclamation of the state of emergency (Article 150), and (e) to appoint members of the Education Service Commission on the advice of the Prime Minister (Article 141a).

3.2 *Conference of Rulers (Majlis Raja-Raja)*

The Conference of Rulers consists of thirteen states' Rulers. Nine of them are hereditary Sultans, while the King appoints the remaining four. The King's election is made among hereditary rulers and only they have the right to vote. The Constitutional powers of the Conference of Rulers are as follows: (a) electing the Yang di-Pertuan Agong and Timbalan Yang di-Pertuan Agong, (b) agreeing or disagreeing to the extension of any religious acts, observances or ceremonies to the Federation as a whole, (c) consenting or withholding consent to any law and making or giving advice on any appointment which under this Constitution requires the consent of the Conference or is to be made by or after consultation with the Conference, (d) appointing members of the Special Court, and (e) granting pardons, reprieves and respites, or of remitting, suspending or commuting sentences.

3.3 *The Cabinet and the Prime Minister*

Like the other parliamentary forms of governments, the Cabinet has a pivotal role in the executive body of the Malaysian system. The Cabinet is in charge of framing policies and programs to govern the country.

The Constitution specifies how the Cabinet is formed. Accordingly, first, the King appoints a House of Representatives' member as Perdana Menteri (Prime Minister). Although it is stated in the Constitution that the King has the discretionary power to appoint the Prime Minister, in reality, he appoints the leader of the majority group in the parliament, since the Prime Minister should have the confidence of the majority of the members of the House of the Representatives. Then, the King appoints on the Prime Minister's advice to other ministers among the members of either House of Parliament. Deputy ministers are appointed in the same way.

The head of the Cabinet is the Prime Minister. Ministers remain in office as long as the Prime Minister is satisfied with his/her performance. For this reason, the Cabinet is shaped in accordance with the enjoyment of the Prime Minister. As a result, taking into account his/her power of appointments to

ministers, deputy ministers as well as senior public posts and determinant position on policy-making processes, the Prime Minister is the most authoritative and decisive person in the headquarters of the country's public administration.

There are two types of ministers in Malaysia. The first type of ministers governs the ministries organized for specific services, while the other type of ministers stays in the Prime Minister office to assist him.

3.4 *Ministries*¹

Ministries are situated at the top of the administrative machinery. Headed by a minister, each ministry is in charge of planning, controlling, and coordinating policies with regard to its field of activity (Royal Malaysian Customs Department [RMCD], 2014: 2). Ministers are also responsible for controlling government departments and statutory bodies related to their ministries. Under the minister, the secretary-general occupies the highest administrative position. The secretary-general is a senior civil servant. The central organization of the ministries consists of units or divisions or sections organized under the secretary-general. While it changes ministry to ministry, generally deputy secretary-generals or principals general directors head divisions.

3.5 *Government Departments*

After the ministries, government agencies occupy the second highest position in the Malaysian federal administrative machinery (International Business Publications [IBP], 2008: 58; RMCD, 2014: 2). The departments' main duty is to apply the policies determined by the ministry they are affiliated to. In other words, they provide daily service to the citizens in accordance with the plan, policy, and program determined by the government (IBP, 2008: 58; RMCD, 2014: 2). In this system, all ministries have their own affiliated government departments. For example, the Economic Planning Unit functions under the Prime Ministry; the Department of Agriculture is affiliated to the Ministry of Agriculture and Agro-based Industry, etc. Government departments are located in the central capital, but are spread throughout the country by the provincial organization. The General-Director usually heads them.

¹ As of 2021, the ministries for various services in Malaysia are as follows: Ministry of Home Affairs, Ministry of Transport, Ministry of Health, Ministry of Primary Industries, Ministry of Tourism and Culture, Ministry of Defence, Ministry of International Trade and Industry, Ministry of Energy, Science, Technology, Environment, and Climate Change, Ministry of Agriculture and Agro-based Industry, Ministry of Rural and Regional Development, Ministry of Foreign Affairs, Ministry of Women, Family and Community Development, Ministry of Works, Ministry of Human Resources, Ministry of Federal Territories, Ministry of Youth and Sports, Ministry of Domestic Trade, Co-operatives and Consumerism, Ministry of Natural Resources and Environment, Ministry of Education, Ministry of Communication and Multimedia, Ministry of Finance, and Ministry of Housing and Local Government.

3.6 *Statutory Bodies*

Statutory bodies are established by parliamentary acts, while ministries and government departments are usually established by executive power. Those bodies are created to fulfill government policies through programs being determined in a professional manner (Auditor General's Report [AGR], 2011: xi) and operate as public regulatory bodies (RMCD, 2014: 3). Even though they are independent from the government, the affiliated minister controls them (Abdul Aziz et al., 2014: 2; AGR, 2011: xi). These bodies are governed by the board of directors consisting of members such as a representative from the Ministry of Finance, a representative from the related ministry, a government officer and corporate members having expertise in the bodies' activities (AGR, 2011: xi). Examples of bodies include Malaysian Industrial Development Authority (MIDA), Malaysian Communications and Multimedia Commission (MCMC), etc.

4 LOCAL GOVERNMENTS

4.1 *General Historical Development*

Just like the other political and administrative institutions, Malaysia's current local government can be traced back to the British colonization period (Ibrahim & Nordin, 1984: 148; Mokhtar & Abd Rahman, 2014: 83). Before the British era, Malaysia had been governed by its own traditional system without having a proper local administrative system. The first local government in Malaysia was formed in Penang in 1801. The name of the local administration was the Committee of Assessors, whose members were local citizens while the chairman was the appointed British official (Mokhtar & Abd Rahman, 2014: 83). Planning and development of Penang were the main duty of the Committee of Assessors (Ibrahim & Nordin, 1984: 148). With the adoption of Municipal Rates Act in 1884, the Committee of Assessors was first enhanced to the Municipal Committee. The Municipal Council subrogated the Municipal Committee two years later, in 1886 (Ibrahim & Nordin, 1984: 148). The election principle for the local government membership was introduced through the Local Elections Ordinance for the Local Authorities in 1950 (Mokhtar & Abd Rahman, 2014: 83).

After the independence, the Constitution covered the local governments under states' authority. On the other hand, the Federal Government was granted some powers on local administrations. In 1960, the Local Government Elections Act was adopted, however, the 1965 local elections were suspended by the Federal Government because of some problems (Mokhtar & Abd Rahman, 2014: 83). According to Mokhtar and Abd Rahman, these problems were: *the Malaysia- Indonesia confrontation policy, internal problems of the local authorities and the issue on racial sentiments* (2014: 83). Subsequently, the Local Government Act 1976 was adopted and the local elections

were abolished. Since then, the appointments made by the states they are affiliated with have formed the organs of the Malaysian local authorities.

4.2 *Types and Administrative Structure of Local Governments*

Malaysia has three types of local governments: City Council, Municipal Council, and District Council. In order to have city status, the settlement must have a population of not less than 500,000 and an income of not less than RM100 million. For municipal status, it is necessary to have a population of not less than 150,000 and an income of not less than RM 20 million. Settlements with a population of less than 150,000 and an income of less than RM20 million are in district status. Criteria are not limited to population and income, there are other criteria that determine the status of a settlement. For example, the city council should have an industrial center, cultural activities center, complete educational center, etc. The distribution of local authorities in Malaysia is shown in Table 1.

The organizational structure of local governments is specified in the Local Government Act 1976. The local authority consists of a mayor or a president and not less than eight and not more than twenty-four other councilors. The Mayor is defined as the head of the city council while the president acts as the head of the municipal council or district council. All councilors, including the mayor or president, are appointed by the state government. Councilors

Table 1 Distribution of local authorities in Malaysia

<i>States</i>	<i>City Council</i>	<i>Municipal Council</i>	<i>District Council</i>	<i>Total</i>
Johor	3	6	7	16
Kedah	1	4	6	11
Kelantan	–	1	11	12
Melaka	1	3	–	4
N. Sembilan	1	2	4	7
Pahang	–	3	8	11
Penang	2	–	–	2
Perak (Silver)	1	4	10	15
Perlis	–	1	–	1
Selangor	3	6	3	12
Terengganu	1	2	4	7
Sabah	1	2	22	25
Sarawak	3	4	19	26
Federal Territories	1	–	–	1
Total	18	38	94	150

Source Local Government Department of Ministry of Housing and Local Government (2020)

should be appointed among the people who are residents in the local government area. Councilors' term of office cannot exceed three years. However, a councilor might be reappointed when his/her term of office is expired.

Every local authority has a secretary as well. The Act 1976 identifies the secretary as the Chief Administrative Officer. The Secretary is also appointed by the state government. Another body of local authorities is the committees, which might be established for various purposes. Finally, every local government has several departments that are tailored to the local authority's size and needs.

4.3 *Scope of the Local Government*

Malaysia has a three-tier governmental system (Abdul Khalid, 2010: 66; Nooi, 2011: 157). These are, respectively, the federal government, the state government, and finally the local government. In Malaysia, the basic law containing provisions on the role, task and structuring of the local governments are the Local Government Act 177 (1976), the Street, Drainage and Building Act 133 (1974), and the Town and Country Act 172 (1974).

The Local Government Act 177 stresses the tasks of the local government as controlling and caring of public places (open space, parking place, garden, recreation, and pleasure ground or square), housing and town planning, sanitary services, licensing, safeguarding and promoting public health, managing burial places, crematoria, and exhumation, social and economic development, waste removal and management, and environmental protection. However, Sabah and Sarawak States are not covered by this Act because of their special status. The local governments of these two states are governed by ordinances issued separately to each state.

Local governments are under the jurisdiction of the states (Nooi, 2011: 158). However, the Federal Government also has some authority over local governments through the National Council for Local Government (NCLG), a consultative body established by the Constitution. Furthermore, the Ministry of Housing and Local Government is in charge of coordinating local authorities. The most characterizing feature of the Malaysian local governments is that their organs are formed by appointments instead of elections.

4.4 *Financial Sources, Audit, and Personnel System*

The revenues of local governments are specified in Article 39 of the Local Government Act 1976. In light of the Article, it is possible to summarize income sources of local authorities under three general titles: tax revenues within locality, non-tax revenues (fine, license fees, trade, etc.) within locality, and external source of income (Federal or State grants, endowments, etc.).

The State Grants (Maintenance of Local Authorities) Act 1981 declares that the Federation makes grants to local authorities through states. The Ministry of Housing and Local Government determines the amount of the grant after

consultation with the Minister of Finance. The amount of the grant varies from local authorities to local authorities depending on factors such as the number of population, geographic size, and socio-economic development rate of the local authorities. The estimated percentage of the grants and transfers from the Federal Government to states for the 2021 budget is 2.4 (Ministry of Finance, n.d).

In the process of accepting the budget of the local government, the relevant state has important authorities. The Local Government Act 1976 rules the budget should be forwarded to the state authority once the local authority has passed it down. The state authority has the power to *reduce or reject any item* in the budget. The budget goes into effect upon state's approval. Pursuant to the Local Government Act 1976, the Auditor General makes the financial audit of local authorities *or other auditors appointed by the State Authority on the recommendation of the Auditor General* (Article 60). Financial audit is conducted annually.

The provisions relating to the personnel are regulated in Articles 16 and 17 of the Local Government Act 1976. Accordingly, a local authority has the power to recruit its own personnel. However, the process of recruiting personnel has also been subject to state's assent. A local government cannot recruit a new staff without the state's approval. Similarly, the local authorities' regulations regarding their personnel's *training, qualifications, tenure of office, duties and terms and conditions of service, including matters relating to maternity benefits, rest days, hours of work, overtime, holidays, leave, retrenchment and retirement benefits, and disciplinary issues* enter into forces upon approval of the state government.

As stated, the Malaysian local governments are under the control and supervision of state governments. Rather than autonomous administrative units, they are designed as "service units" subject to strict hierarchies of states.

4.5 *Intergovernmental Relations*

Following the discussion about the relationship between the states and local authorities mentioned above, this section elaborates on the Federal Government's relation to states and local governments. The structure of the state government is parallel to the Federal Government. All states have their own legislative and executive bodies and constitutions. There is no authority over the Federal Government in the formation of the organs of the states. The head of the states are called Rulers. Nine of the thirteen States' Rulers are hereditary whereas the King of Malaysia appoints the rest on the advice of the Chief Minister of the relevant state. The Ruler appoints a Chief Minister among legislative members. Unlike the Federal Government, the state's legislative bodies are unicameral.

The distribution of power between the Federal Government and the state governments is explicitly stated in the Ninth Schedule of the Constitution, which includes the Federal list, State list, and concurrent list. Those lists

specify the areas in which the Federal and states governments are authorized. According to the Constitution, the autonomy of Sabah and Sarawak States is greater in some areas than other states. In addition, the Constitution states “*if any State law is inconsistent with a federal law, the federal law shall prevail and the State law shall, to the extent of the inconsistency, be void*” (Article 75). As a result, the Constitution clarifies the authority areas of the state and Federal governments in Malaysia and solves the problems that might arise due to inconsistency of the Federal and State law.

The Federal Government intervenes with local authorities through two channels to ensure uniformity of laws and policies. The first channel is the National Council of Local Government (NCLG), a Constitutional body established in 1960. According to Article 95A of the Constitution, the duty of the NCLG is to *formulate a national policy and relating laws for the promotion, development, and control of local government* throughout the country. Federal and state governments except for Sabah and Sarawak States should follow the policies formulated in the NCLG. The Council consists of a minister acting as chairman (Minister of Housing and Local Government), one representative from each state appointed by the Rulers, and ten more representatives from the Federal Government. The Council sits at least once every year.

The other institution by which the Federal Government influences local governments is the Ministry of Housing and Local Government. Besides other duties, this Ministry functions as an advisor for the local authorities. In this context, the Ministry “helps guide the local authority in providing municipal services,” “provides policy and technical advice to local authorities,” and “implements programs to enhance local authority governance” (Ministry of Housing and Local Government, 2021). As a result, the Federal Government has the ability to direct local governments through the NCLG and the Ministry.

5 PUBLIC PERSONNEL SYSTEM

The Malaysian public service comprises the armed forces, the judicial and legal service, the general public service of the Federation, the police force, the joint public services, the public service of each State, and the education service (Article 132). In 2019, the total number of civil servants working in these services was 1.71 million (Abas, 2019). As mentioned earlier, the Malays dominate the civil service. According to the data from 2015, the Malay rate constituted 79%, the indigenous Bumiputera was 11%, the Chinese was 5.2%, and the Indian was 4.1% in the Malaysian civil service (Chong, 2016).

In Malaysia, public officials are divided into two main groups: the Management and Professional Group, whose entry requirement is a bachelor degree; and the Support Group, for whom the college diploma or secondary or lower school certificate is sufficient for recruitment (Abd Manaf, 2011: 212). High public officials are appointed among senior officials of the Management and Professional Group.

In Malaysia, there are two important public institutions functioning on human resource policies, recruitment, disciplinary, and retirement processes as well as other personal affairs of public officials. Those are Public Service Department (PSD) and Public Service Commission (PSC). PSD is a governmental department, where all policies related to the human resources of the country's civil service are determined, functions under the Office of the Prime Ministry (Abd Manaf, 2011: 216). In this context, the functions of PSD are basically (i) *to determine the organizational size and structure of the public agencies, the requirement and development of human resource, the Career Development, and the Training Policies; and (ii) to formulate and clarify policies on the appointment, emplacement, remuneration, promotion, retirement benefits, service conditions, employer-employee relations, training, and human resource database to implementer agencies* (Public Service Department, 2017). As it can be seen, PSD is a central policy maker, planner, coordinator, and observer department in the Malaysian civil service.

The Public Service Commission (PSC), on the other hand, is a constitutional body, playing a role in the appointment, confirmation of service, promotion, conferment into pension status, as well as exercising disciplinary control over members of the civil service (Article 144 of the Constitution). The PSC's members are appointed by the Yang di-Pertuan Agong after considering the advice of the Prime Minister and consulting with the Conference of Rulers (Article 139 of the Constitution). While the policy and standard setting body in the Malaysian civil service is the PSD, the PSC is equipped with some operational powers, such as recruitment and disciplinary actions on public officials. The reason why the processes, such as recruitment and discipline, are carried out by another institution is to provide neutrality and independence (Abd Manaf, 2011: 216).

The recruitment process for entering the Malaysian civil service is handled by the Public Service Commission. The process begins when a ministry/department/state government applies to an online application system, known as *ePengisian*. The application should include numbers of vacancies, list of job, job description, and other important information related to the job. Upon receiving the application, PSC first checks the list of reserve candidates in order to determine whether any of the candidates have necessary conditions for the job and availability. If no valid candidates are found in the list of the reserve candidates, PSC announces the position and acquires applications through the online "system Sistem Mengambil Sepanjang Masa" (Ongoing Recruitment System) or *eSMSM*. Candidates have the right to apply for a maximum of ten jobs. An interview and the appointment processes follow the application process. In some cases, exams are held before the interview. Exams are held if the job requires special skills or expertise, or if the numbers of applications exceed the vacant position. However, exams are not held in all cases where applications are higher than vacancies. The exam is just one of the elimination methods that is used sometimes. There are other selection criteria

such as Cumulative Grade Point Average (CGPA), gender, age, higher qualification like Masters/PhDs, etc. Candidates passing the selection process enter the interview. After the interview, the recruitment process is concluded when successful candidates are appointed to the relevant position.

In the context of the recruitment process, two aspects come to the forefront. The first is that the recruitment process is equally open to all citizens. The process is based on merit and talent rather than nepotism or political consideration (Abd Manaf, 2011: 217). The other issue is that the whole process is carried out via the computerized system.

Newly appointed civil servants go through a three-year probationary period. In this period, they take the necessary vocational training and then enter the exams. The National Institute of Public Administration (INTAN), which operates under the Public Service Department, provides these trainings. Appointment of civil servant candidates who have received the necessary training courses, successfully pass the exams and have completed the three-year probationary period are confirmed. Once being confirmed, civil servants can serve until retirement. Their appointment is on a permanent basis. Government changes do not injure their job security.

In Malaysia, the civil service system is career-oriented. For civil servants, the career path, which is based on experience and performance, is predictable (Edigheji, 2014: 14). “The scheme of service” determines a public official’s career (Abd Manaf, 2011: 222). In this system, lower and upper positions are predefined within a job group and the attributes required for transitions between each position are predetermined. Promoting from a lower position to a higher position is only possible for officers in the same scheme of service. Therefore, vacancies are closed to outsiders. Promoting from one position to another takes between five to eight years (Edigheji, 2014: 14).

In Malaysia, public officials are prohibited from being a member of a trade union, except for the class or category of public servants announced by the King (The Yang di-Pertuan Agong) in the Official Gazette. However, as stated in the Trade Union Act 1959, members of *the Royal Malaysian Police, prison service, the Armed Forces, public officers engaged in a confidential or security capacity, public officers who are prohibited under any written law from forming or being members of a trade union, and public officers holding any post in the Managerial and Professional Group* could under no circumstances be union members. The number of public servants unions and their members in Malaysia from 2009 to 2018 is shown in Table 2.

Based on these data, approximately one-third of public officials have union membership, and public sector unions have some bargaining power. However, this power is not in the nature of active negotiation and is limited to expressing opinions about wages and workplace conditions (US State Department, 2021: 37).

Table 2 The number of public servants unions and their members

<i>Year</i>	<i>Government</i>		<i>Statutory Body</i>	
	<i>Number</i>	<i>Membership</i>	<i>Number</i>	<i>Membership</i>
2009	137	306,168	93	66,317
2010	139	306,176	98	66,178
2011	144	306,499	98	66,143
2012	140	434,224	99	77,425
2013	144	437,302	100	79,680
2014	145	471,751	105	82,399
2015	146	463,965	105	82,663
2016	147	478,559	106	87,212
2017	164	489,948	87	69,616
2018	166	470,910	87	69,685

Source Yusop and Hassan (2020: 51)

6 CIVIL SOCIETY AND NGOs

The traces of civil society in Malaysia can be observed since the colonial period (Abdul Aziz, 2019: 90; Giersdorf & Croissant, 2011: 6; Guan, 2011: 75). As a result of Malaysia's ethnic and cultural pluralism, the non-governmental organizations (NGOs) that emerged during the colonial period were largely ethnic and religious based associations (Abdul Aziz, 2019: 90; Guan, 2011: 75). Even though they were of ethnic and religious origin, most of these organizations had been involved in sportive, cultural and socializing activities rather than political activities (Weiss, 2006: 53). Their turn toward political activities coincided with the end of the Second World War. In line with the increasing demands and efforts toward independence after the War, NGOs played an active role in ensuring that communities with different ethnic and religious origins (Malays, Chinese, and Indians) have a say in the new administration (Weiss, 2006: 54). In addition to ensuring the political participation of different ethnic groups, these organizations also undertook activities to protect and develop the identity and cultures they represent and increase their economic and social welfare. During the colonial period, the British made some legal regulations restricting the freedom of association, to fight communism (Giersdorf & Croissant, 2011: 6). One of the most important of these regulations is the Internal Security Act (ISA), which remains in effect after the independence.

The period between 1957 and 1969 was a period in which the number of NGOs in Malaysia increased, although some legal regulations restricted the freedom of association such as the Trade Unions Act and the Industrial Relations Act (Giersdorf & Croissant, 2011: 6). Although their influence on political life and government policies was weak and they were mainly engaged in cultural and religious activities, the number of these organizations reached

200 in 1969, while there were only 72 associations in 1957 (Giersdorf & Croissant, 2011: 6).

The riot in 1969 deeply affected civil society's development in Malaysia, as it affected many aspects of political life. The government has taken various regulations and measures in order to protect the Malay identity and to pacify the elements that threaten this identity. Some regulations restricting the freedom of association that have been enacted or amended after 1969 are as follows: the Sedition Act, the Official Secrets Act, the Printing Presses and Publishing Act, the Control of Imported Publications Act, the Police Act, the Trade Unions Act, the Societies Act, the University and University College Act, the Internal Security Act, the Trustees Act, and the Companies Act (Guan, 2011: 73–74). With all these and similar legislation, the government has been granted large powers in the establishment and activity stages of NGOs.

However, despite all these restrictions, the development of civil society in Malaysia has not stopped. For example, the number of registered NGOs increased from 31 985 in 1980 to 58 738 in 2007 (Guan, 2011: 73–74). In 2017, the number of NGOs reached 66,828 (Mhd Omar & Syed Ismail, 2019: 74).

With the increase of NGOs in Malaysia, significant progress has been made toward the integration of the private sector in the delivery of public services. In this context, firstly, as stated above, Malaysian Incorporated Policy was put into effect in 1981. This approach treats the entire country as a large company. Accordingly, both the private sector and the public sector will act together as an element of the “Malaysian Company” for the economic development of Malaysia (Rafie & Shuib, 2018: 3). In this understanding, the private sector is given the role of undertaking large economic and commercial investments, while the public sector has been given the role of policy maker and facilitator of large investments of the private sector. In line with the Malaysian Incorporated Policy, the Privatization Policy was introduced for the first time in 1983. In 1985, the Guideline on Privatization was published, which sets out the procedures and principles regarding the Privatization Policy (Rafie & Shuib, 2018: 3). In addition to this, the Master Plan on Privatization was declared in 1991. According to Public-Private Partnership Unit of Prime Minister's Office (UKAS), which is a unit established in 2009 under the Prime Ministry Office responsible for public-private partnership and privatization issues, nearly 500 privatization projects were implemented, while the government generated around RM 161 billion in revenue and avoided approximately RM 25 billion of operational costs, and finally 133,440 public servants were transferred to the private sector between 1983 and 2009 (Public-Private Partnership Unit, 2021).

In 2006, with the Ninth Malaysia Plan, public-private partnership policy (PPP) was officially announced for the first time. The most prominent scheme adopted by the Ninth Plan within PPP policy scope was the Private Finance Initiative (PFI). PFI, adopted as an alternative procurement model, is defined in the Ninth Plan as, “the transfer to the private sector the responsibility to finance and manage a package of capital investment and services including the construction, management, maintenance, refurbishment and replacement of the public sector assets which creates a standalone business. The private sector will create the asset and deliver a service to the public sector client. In return, the private sector will receive payment commensurate with the levels, quality and timeliness of the service provision throughout the concession period” (Ismail & Harris, 2014: 5).

PPP policy was expanded and adopted in the Tenth Malaysia Plan announced in 2010. Currently, the PPP models conducted in Malaysia are sale of equity model, sale of assets model, corporatizations model, land development and land transfer models, the Build-Operate-Transfer model (BOT), the Build-Operate-Own model (BOO), management contract model, leasing model, the Build-Lease-Transfer model (BLT), the Build-Lease-Maintain-Transfer model (BLMT), listing model, and facilitation fund model (Public-Private Partnership Unit, 2021). As a matter of fact, Malaysia has made huge investments in sectors such as infrastructure, schools, hospitals, transportation, and energy so far with the PPP method. Until now, 124 projects with a cost of USD 52,387 million have been realized through PPP, while currently 99 active projects with an approximate amount of USD 40 million are underway (PPP Knowledge Lab, 2021).

7 RECENT DEVELOPMENTS

Vision 2020, which was announced by Mahathir Muhammad in 1991, has had a considerable influence on Malaysia’s recent changes and reforms in the field of public administration. The application of the Vision was not limited to Mahathir’s period. The following Prime Ministers have also adopted the Vision and continued reforms to reach the targets set out in the Vision.

The main aim of the Vision 2020 is to make Malaysia a fully industrialized and developed country by 2020. As achieving the Vision requires the public sector’s restructuring in such a way that public services are provided efficiently, effectively and capable of realizing the Vision, many reforms have been introduced since the announcement of the Vision. The reforms have been directed at various areas, such as shortening the bureaucratic processes and increasing citizen satisfaction, changing the organizational structure of public institutions, and transforming the work culture of public employees.

In this context, counter services were modernized and one-stop centers were established in order to provide citizens with easy access to services. With one-stop centers, it has become easier to obtain permits and licenses required especially for business life (Siddiquee, 2007: 84). In order to improve the work environment of the civil servants as well as the quality of the services provided to citizens, Total Quality Management (TQM), the Client's Charter, and ISO9000 were introduced. The Client's Charter is the written commitment of public institutions to ensure that the services offered to citizens by public authorities would have a certain quality answering citizens' expectation (Tjiptoherijanto, 2012: 3). In addition, the New Remuneration System was introduced in 1992 in order to shift to a performance-based wage system for public officials. This system was replaced with the Malaysian Remuneration System (MRS) in 2002. The intention of both systems is to improve the performance of public officials and the quality of services provided to the public.

Finally, considerable steps were taken with regard to e-government. The acceleration of the e-government process in Malaysia took place in 1996 with the establishment of The Multimedia Super Corridor (Siddiquee, 2007: 86). Especially since this date, many electronic services, such as the Electronic Government, Multipurpose Card, Smart School, Telehealth, R&D Clusters, e-Services, Technopreneur Development, e-Land, e-Syariah, PEMUDAH, have been provided to the public. Currently, 83% of the services in Malaysia are available online (The Malaysian Public Sector ICT Strategic Plan [2016–2020], n.d.: 4). According to the United Nations E-Government Survey 2020, Malaysia is ranked at the 47th place in the world (2020: 48).

Currently, the most considerable initiative carried out in relation to public administration is the Transforming Public Service for Productivity. The Government Transformation Programme (GTP) was launched first in the Tenth Malaysia Plan (2011–2015). The Transforming Public Service for Productivity is included in the recently announced Eleventh Malaysia Plan (2016–2020), the last plan prepared to reach Vision 2020 targets, as an extension of the Government Transformation Programme (GTP).

The aim of the Government Transformation Programme (GTP) was to improve quality of life by focusing some key areas, which were “*fighting corruption, reducing crime, assuring quality of education, raising living standard of low-income householders, improving rural development, improving urban public transport, and addressing the rising cost of living*” (Eleventh Malaysia Plan [2016–2020], 2015: 8). Therefore, the GTP was a fairly inclusive program covering almost all government services.

The Transforming Public Service for Productivity, on the other hand, aims at *enhancing the efficiency and productivity of the public service* (Eleventh Malaysia Plan [2016–2020], 2015: 2). Five focus areas have been declared

in this context: (i) *Enhancing service delivery with citizens at the center*; (ii) *Rationalizing public sector institutions for greater productivity and performance*; (iii) *Strengthening talent management for the public service of the future*; (iv) *Enhancing project management for better and faster outcomes*; and (v) *Capitalizing on local authorities for quality services at the local level* (Eleventh Malaysia Plan [2016–2020], 2015: 11). In order to address those areas, it is reported that Ministries have formulated 605 strategic measures and 1,461 transformations (National Institute for Public Administration, 2017).

In the Eleventh Plan, some of the outcomes to be achieved as a result of implementing the Transforming Public Service for Productivity are presented. Accordingly, the government will adopt flexible working arrangement scheme, “Cloud Computing” will be established for data sharing among public agencies, and “Public Sector Comparator (PCS)” will be established as a reference for comparing the cost of public sector projects with private sector projects (Eleventh Malaysia Plan [2016–2020], 2015: 10).

8 CONCLUSION

The current system of government and organization of public institutions show that the British administrative system heavily influences Malaysia’s public administration. In most of the countries, ethnic pluralism, long colonial rule as well as the history and culture undoubtedly have had significant impacts on the public administration (Islam, Bingöl, & Nyadera, 2020; Islam, Bingöl, Nyadera, & Dagba, 2021; Nyadera & Islam, 2020), and Malaysia is not exceptional in this case. Ethnic pluralism has produced two important results in terms of public administration. First is the dominance of Malays in public service. The other is “centralization” of the government in order to combat the fear of separation. No doubt, the issue where the phenomenon of centralization can be most felt is in the local governments. Malaysian local government bodies come to power not by election but by appointment.

National security concerns and fear of separation appear to be reflected in the development of civil society as well. Legislations grant to the government large powers in the establishment and activity stages of NGOs. However, despite all these restrictions, Malaysia has a vibrant civil society. On the other hand, Malaysia’s public administration has undergone a period of significant reformation and modernization, especially in the last thirty years. With the development of civil society, privatization practices and PPP methods have been used frequently after the 1990s. In recent years, it has been observed that e-government applications focused on the provision of public services (Table 3).

Table 3 Main features of public administration system in Malaysia

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Administrative history	Geopolitical situation	Strategic
	Colonial history	Yes (from 1511 to 1957 period)
	Legacy of bureaucracy	Yes (Empire)
	Centralized bureaucracy	Strong
	Role of military	Weak military influence
	Political culture	Conservative
	Administrative culture	Participative
	Professionalism	Moderate
	Politicization of bureaucracy	Moderate
	Dominant state ideology	Religious/Islam
Legal structure	Nature of constitution	Written
	Origin of constitution	1957 & Independence
	Strong constitution	Yes
	Constitutional rigidity	Yes
	Created by	civil initiatives
Central government	Revised by bureaucracy	civil initiative
	State structure	Federal
	Government structure	Parliamentary
	Hierarchical structure	Strong
	Local extension agencies	Too many
	Central government	Yes & strong
	Coordinating mechanisms	moderate
	Transparent financing system	moderate
	Monitoring	moderate
	Independent regulatory agencies	Exist
Local governments	Financial autonomy	Weak
	Political autonomy	Weak
	Council types	Council mayor
	Mayors	appointed
	Decision making bodies	Exist/Council
Intergovernmental relations	Central tutelage/monitoring	Exist & strong
	Logic for Division of tasks	Political
	Tutelage/monitoring	Strong
Public personnel system	Communication	Strong
		Formal
	Civil services	Career based/Prestigious

(continued)

Table 3 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Reform philosophy	Recruitment and promotion	Not Competitive Political Not fair
	Nationwide exam	Exist
	Politicization in general	Moderate
	Institutionalization	Moderate
	Partnership with the state	Moderate
	Political pressure/domination	Moderate
	Major financial revenues	Membership fees, operating incomes, government supports, donations, and fundraising activities, rents
	Supportive national culture	Moderate
	Political regime & civil society relations	Strong
	Civil society	Prestigious
	Dominant reform paradigm	New public management
	E-government reforms	Not completed
	Artificial intelligence (AI) reforms	Partial exist

Source Adapted and developed from Önder, M., & Zengin Ü. N. (2022). A framework for comparative analysis: Public administration across the globe. In M. Onder, I. N. Nyadera, & M. N. Islam (Eds.), *The Palgrave handbook of comparative public administration: Concepts and cases*. Springer Nature Palgrave Macmillan

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South Korea

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I INTRODUCTION

South Korea, which is formally called the “Republic of Korea,” was established at the end of World War II like many other countries in the new international world order. Korea was liberated from the Japanese empire, which was one of the Axis powers, in 1945. Korea was under Japanese colonial rule for 36 years from 1910 to 1945. Chosun was the only country, which ruled the Korean peninsula for 518 years from 1392 when Sungkye Lee, King Taejo, governed the Lee dynasty. Soon after the liberation, the US and the USSR divided and ruled for 3 years as a trusteeship. In this arrangement, the USSR established the northern part of the peninsula as a satellite state and only the southern part could form a government under UN recognition in 1948. North Korea commenced hostilities against the South in 1950, which signaled the beginning of the Korean War. North Korea, which was supported by the Soviet Union and China, and South Korea supported by the UN waged a tragic war for three years until 1953. At that time 16 allied countries, including the US, engaged in the war to support South Korea.

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In 1948, Korea's GDP Per Capita was US \$50, which is the lowest rate in the world, and the illiteracy rate was approximately 80% (Choi, 2018: para.1). As a result, this devastating Korean War made the situation worse. General Douglas MacArthur said it would take more than 100 years for Korea to rehabilitate from the shattered post-war economy. However, it didn't take that long for Korea to rebuild the country. According to CEIC (2018), the per capita GDP of South Korea reached US \$29,743.50 in December 2017. And South Korea would be the 7th richest country in the world in terms of GNI in 2020 (*Korea IT Times*, 2021). Now this country is a paragon of development administration in the world.

South Korea has a homogeneous population sharing a common ethnic, cultural, and linguistic heritage. It is governed by a presidential system including an independent chief executive. Due to the politico-economic location surrounding China, Japan, Russia, and the United States, South Korea has been influenced by these four strong countries in the world (Önder & Ulaşan, 2016).

In South Korea there are various religions such as Shamanism, Confucianism, Buddhism, and Christianity, but Christianity only started to become the most influential religion in the last century. Catholics and Protestants began missionary work in Korea respectively in 1784 and in 1884 and within a short period increased significantly (Önder & Ulaşan, 2016: 34). Although, in 1900, Korea only had a 1% Christian population, South Korea's population in 2010 consisted of citizens who do not believe in any religion (46%), those who believe in Christianity (29%), and those who believe in Buddhism (23%), according to Pew Research Center (Connor, 2014).

2 ADMINISTRATIVE HISTORY

Although Korea has a long historical background (starting from approximately 2,300 BC), modern public administration of Korea is based on the traditional system, the Japanese colonial system, and Western disciplines such as American administrative values. Therefore, these kinds of strands or combination are reflected in the Korean administrative system.

2.1 *Roots and Development of Administrative Tradition and Administrative Culture*

The Korean public administration, which was highly influenced by traditional Confucian values and the Japanese colonial administrative custom, began to introduce American values soon after Korea was liberalized in 1945. A law-oriented German tradition was used in Korea by Japan before 1945. Since then, management-oriented American public administration extensively has influenced in the process of the improvement of Korean public administration. Because of this reason, Korean public administration can be termed as both a hybrid and a unique system (Önder & Ulaşan, 2016).

Starting from Korean independence in 1945, the Korean administrative culture could be divided into four categories: Confucian culture, developmental state culture, democratic culture, and other recent diversions of administrative values such as New Public Administration, New Governance, and New Public Service.

2.2 *Historical Development of Korean Public Administration*

Based on a combination of traditional Confucian values and modern western values, Korean public administration has made a hybrid and unique system. The history of Korean public administration could be categorized into 4 stages:

- a. **The public administration stage before the Republic of Korea (prior to 1948):** The Chosun dynasty was the absolute power and ruled the country from 1392. The dynasty kept a highly centralized unitary administration system. The king sometimes shared power with several of the noble clans which did not get along with each other and have different opinions. These clans worked as political parties. Although the king appointed governors to districts and regions, they sometimes failed to perform their duties efficiently. The reason was that landowners and elites in those local areas had their own hegemony on their turf. Chosun was colonized by Japan in the early twentieth century (1910–1945). Japan ruled Korea with a more centralized administration system and laid the foundation of modern administrative bureaucracy. But this system was flawed and ultimately helped Japan exploit Korea mercilessly. After World War II finished, Korea was liberated. However, the varied ideologies made the public fragile and the US occupied Korea for three years right after Korean liberation in 1945. The US military government did not change the administrative system Japan created (Rho & Lee, 2010: 330–331).
- b. **The nation-building stage (1948–1961):** On August 15, 1948, the Republic of Korea was formally established and the first constitution of the republic was promulgated on July 17, 1948. The constitution adopted a presidential system combined with a parliamentary system. For instance, the president acted as the head of state and was elected indirectly by the National Assembly. The Japanese colonial legacy and the outbreak the Korean War, the division of Korea, and social chaos affected the Korean administrative system in this period. Dr. Syngman Rhee was the first and the only president of the First Republic (1948–1960). Dr. Syngman Rhee kept anti-communist policies, tried to stop ideological conflicts, and restricted freedom in the state. However, due to the authoritarian governing style and long-term rule, enormous antigovernment demonstrations (April revolution) occurred and president Syngman Rhee had to resign in 1960. After that, the general election was held

and Bosun Yun came to power as the president and Myon Jang (1960–1961 as the Jang administration) as the head of the cabinet (the prime minister). This interim government was called the Second Republic and took the power in 1960 with the support of the public and revised the constitution to create a parliamentary system with lower and upper houses in the National Assembly. However, this parliamentary government was dissolved by the military coup in 1961. Hence, there were not many changes in government system and procedure (Choi, 2018).

- c. **The Modern bureaucratic state and industrialization stage (1961–1987):** On May 16, 1961, social instability of the Second Republic caused the military coup by General Chung-Hee Park (1961–1979). The military revolutionary committee took power and announced six aims it wanted to achieve. These aims were anti-communism, abiding by the US charter, good relations with the US and other independent countries, an anti-corruption movement, and achieving national unification. The military created the Democratic Republican Party and won the elections. The Third Republic revised the constitution to establish a robust presidential government system and a unicameral national assembly system. A new constitution was accepted in a national referendum and came into effect in December 1963. One year later General Chung-Hee Park left his duty in the military and was elected as the president of South Korea. South Korea turned into the development state and focused on the modernization of the state. So government claimed the neo-mercantilist industrialization policy, and the policy focus of the government was stated economic development with strong interventionism, protectionism, and nationalism (Kim, 2006; Rho & Lee, 2010).

Government institutions as a modernizing agent played a vital role in progress and growth. The world average growth rate was 4.8% between 1961 and 1979 and the annual average economic growth rate during the Park administration (1961–1979) was 9.5% which was much higher than other countries' annual average economic growth rates (Choi, 2018). However, democracy, local governance, and local autonomy were neglected and the administrative system turned out to be more centralized. The bureaucracy became more autonomous from the parliament and the bureaucracy was able to plan and implement the development policy (Rho & Lee, 2010).

In 1972, the constitution was amended and was called the Yusin (revitalizing reforms). Thus, the Fourth Republic was established. Korea changed the process of direct election of the president to indirect election by the National Conference for Unification, which was created for presidential elections. The constitution allowed Chung-Hee Park to remain in office indefinitely through indirect elections. The autocracy and dissatisfaction affected the administration severely; president Park was assassinated on October 26, 1979 (Rho & Lee, 2010). Under the Chung-Hee Park administration, South Korea rapidly developed

economically. At that time, the state was called as an administrative state because his government highly influenced the public and private sector (Choi, 2018).

Minister Kyu-Hah Choi (1979–1981) was elected president by the National Conference for Unification (an electoral college of the Yusin system) after the assassination of Chung-Hee Park. Under the leadership of General Doo-Hwan Chun, a military coup took place again on December 12, 1979. Kyu-Hah Choi resigned from the presidency on August 16, 1980. After Chun Doo-Hwan was elected president by the Electoral College on August 27, he amended the constitution, which permitted presidents to be elected for a single seven-year term. The Korean government allowed political parties to work on December 1980 and the martial law was lifted in 1981. National Assembly elections and a presidential election took place in February 1981. On March 3, 1981, Doo-Hwan Chun (1981–1988) inaugurated his 7-year presidency under the new constitution and the Fifth Republic began.

- d. **The Debureaucratized democratic stage (1988–present):** As of June 1987, democratization process in South Korea went one step further. The June Uprising in Seoul spread all over the country and the public strongly protested against the authoritarian regime. This intense protest and demonstration movement lasted from June 10 to June 29, 1987. The main purpose of the protest was to regain direct presidential elections. The head of the ruling party, Tae-Woo Roh finally promised to declare direct presidential election and other democratic reforms. The declaration includes (1) direct presidential elections, (2) revisions in the election law, (3) political amnesty for dissidents and restoration of civil rights, (4) a constitution promoting all basic rights, (5) laws improving the press freedom, (6) local autonomy, (7) encouraging dialog for political stability, and (8) courageous social reforms to create a clean society (Lumsdaine, 2009: 194).

In 1987, the Sixth Republic was established and the constitution was revised. The constitution came into effect on February 25, 1988, when Tae-Woo Roh (1988–1993) was inaugurated as the president. The constitution was amended for the first direct election of the president for a single five-year term. The administration revitalized local autonomy and introduced the ombudsman system as well. Kim Young-Sam (1993–1998) was the 14th president and was the first civilian president elected since 1961. The administration restored the local autonomy suspended after the 1961 military coup. Due to the worldwide economic crisis, the economy of Korea was severely damaged as well during this time and Korea had to receive a bailout from the International Monetary Fund (IMF). In this dismal situation, the presidential election took place on December 18, 1997, and the first peaceful and democratic power shift (from the ruling party to an opposition party) in Korean history occurred. Dae-Jung Kim (1998–2003) took presidential office on February 1998. He carried out

many reforms in and out of government to overcome the financial crisis based on New Public Management (Rho & Lee, 2010: 336–337).

In 2002, the presidential election took place, Moo-Hyun Roh (2003–2008) won and took office the following year. Opening the populist government, he announced three political aims: a society of “balanced development,” an epoch of peace and prosperity in Northeast Asia, and democracy with the people (Kihl, 2005: 52). He attempted to carry out many reforms on the basis of democracy and equality. But he could not achieve his goals mainly because main stream elites were not willing to support him (Rho & Lee, 2010: 338). However, there were some big achievements in his administration. He made some progress on curing the economic disparity between metropolitan and rural areas, and carried out decentralization policies which delegated more rights to the local governments from the central government, and gave more opportunities to citizens to participate in the policy-making process.

Myung-Bak Lee (2008–2013) became the 17th president in 2008. The Myung-Bak Lee’s administration carried out huge market friendly deregulatory policies and promoted green investment. Compared with Moo-Hyun Roh’s administration, the Lee administration’s policy-making process was much closer to state bureaucracy. The state bureaucracy made the Lee administration highly efficient but weak regarding citizen participation (Yun & Lee, 2011: 313–314).

The 18th presidential election took place on 19 December 2012 and Geun-Hye Park (2013–2017) was elected. On 25 February 2013, she became the first female president in South Korean history. Geun-Hye Park’s father was Chung Hee Park who ruled the country with an iron fist for 18 years (1961–1979). Geun-Hye Park’s administration promised to embrace a pragmatic pro-business and growth-oriented agenda. This included the restriction of the power of mighty business conglomerates (*chaebols*), the advancement of women’s status, and the dialog with North Korea under the condition of “trustpolitik.”¹ Geun-Hye Park’s administration supported centralization, took the full power of the Executive and the political system, and became more hierarchical. South Korea reached enormous economic growth in cross-OECD comparison. In 2015, South Korea reached an annual GDP growth rate of 2.6%, which was higher than the OECD average annual GDP growth rate of 2.1%. But the bitterness in 2014 that started with the Sewol ferry tragedy² turned into massive protests for the impeachment of Geun-Hye Park in 2016 due to the allegations of corruption, abuse of power, and an influence pending scandal. Therefore, the majority of the parliament decided to impeach Geun-Hye Park. The Constitutional Court upheld the impeachment in a unanimous 8-0 decision on 10 March 2017 and Geun-Hye Park was

¹ The restoration aid and cultural contacts with the North Korea in exchange for better behaviors from the North Korea.

² The Sewol ferry sank in Jindo Island on 16 April 2014, 304 people died and nearly all of them were children on a school trip.

removed from office. Due to the sudden resignation of the 18th president, Democratic Party candidate Jae-In Moon was elected as the 19th president of South Korea by snap election (Kalinowski et al., 2017). His administration tried to succeed the 16th president Roh's political legacy to strengthen decentralization and balance unequal growth between metropolitan and rural areas. For the foreign policy, his administration tries to strengthen ties with North Korea and China rather than the US. Especially, the real estate policy almost endangered the Korean economy during his term.

During the debureaucratized democratic stage from 1988 to 2017, one of the big policy achievements was the rate of the economic development. In the first year of the democratization stage (1988), the per capita GDP of South Korea was US \$4,813. The per capita GDP of South Korea reached US \$29,743.50 in December 2017. Also, the methods and functions of this public administration stage have been separated from other stages' methods and functions. Compared with old stages, the national parliament and political parties have become stronger and the media, non-governmental organizations, civil society organizations, labor unions, interest and community groups have become more influential on the government and society over time. Especially, since the late 1990s, as theories of new governance have come out and garnered increasing attention in the academic world, the importance of stakeholders and civil organizations has increased (Choi, 2018).

3 CENTRAL GOVERNMENT

Korea has been considered a major example of majoritarian presidentialism (Lijphart, 2012: 122). South Korea has a unitary and centralized government system. Unicameralism is a parliamentary system and the president serves as the head of state and the executive branch. Legislative power is used by the National Assembly (the constitution of South Korea, 1987: article 40). Korea adopted the idea of separation of the judiciary from the legislature and the executive. There is a system of checks and balances between three branches. In addition, if the Assembly passes a law about impeachment, that law can be sent to the judiciary branch for re-examination (the constitution of South Korea, 1987: article 111).

3.1 *Executive Branch*

The Korean president is the head of the executive branch (the constitution of South Korea, 1987: article 66). The government of South Korea has a prime minister instead of a vice president. According to article 86 in the constitution, the Korean president selects the prime minister with the consent of the National Assembly. The prime minister acts as the principal executive assistant to the president, superintends the administrative ministries, directs the executive ministers under the order of the president, and is in charge of the Office for Government Policy Coordination under the authority of the president.

The president is elected by a direct popular vote of citizens for only a single 5-year term without the possibility of reelection (the constitution of South Korea, 1987: article 70). The president is formally the chairman of the State Council (cabinet) which deals with main national policies within the power of the executive (the constitution of South Korea, 1987: article 88), the vice chairman is the prime minister and the members of the State Council are chosen by South Korea's president on the advice of the prime minister (the constitution of South Korea, 1987: article 87/1). The State Council consists of the president, the prime minister, and other members whose should number 15 to 30.

The executive branch is composed of the president, state council, and the prime minister. But the president has agencies which function under the direction of the president. These agencies include the National Intelligence Service, the Board of Audit and Inspection, and the Communication Commission. The president chooses the heads of these organizations with the consent of the National Assembly. The financial accounts of local and central government agencies, associated organizations, and government corporations are audited by the Board of Audit and Inspection. Also the Board of Audit and Inspection has the power to examine abuses of the public authority and misconducts of the public officials in their duties. The reports are given to the president and the National Assembly. The National Intelligence Service is in charge of collecting, examining, and analyzing external or internal information on the threats about criminal activities (Rho & Lee, 2010: 338). Overall structure is exposed in Fig. 1 (Choi et al., 2012: 110).

3.2 *Legislative Branch*

The national assembly has authority to make laws. As of 2021, the national assembly is composed of 300 members, 246 members elected by the people in single-seat constituencies by simple majority vote and 54 members elected proportionally by the parties. The ballot is considered direct, secret, equal, and universal (the constitution of South Korea, 1987: article. 41). In Korea, even though all bills should be approved by the national assembly, the executive branch and the members in the National Assembly have the right to introduce bills.

3.3 *Judicial Branch*

In South Korea, the judiciary contains three-tier structures that are the Supreme, High, and District Courts, and also has a specialized family and administrative court. The highest judiciary power is known as the Supreme Court and the president appoints its chief judge with the consent of the national assembly. In addition, the Supreme Court consists of 13 judges and a chief judge. The president appoints other judges upon the advice of the chief judge with the approval of the national assembly.

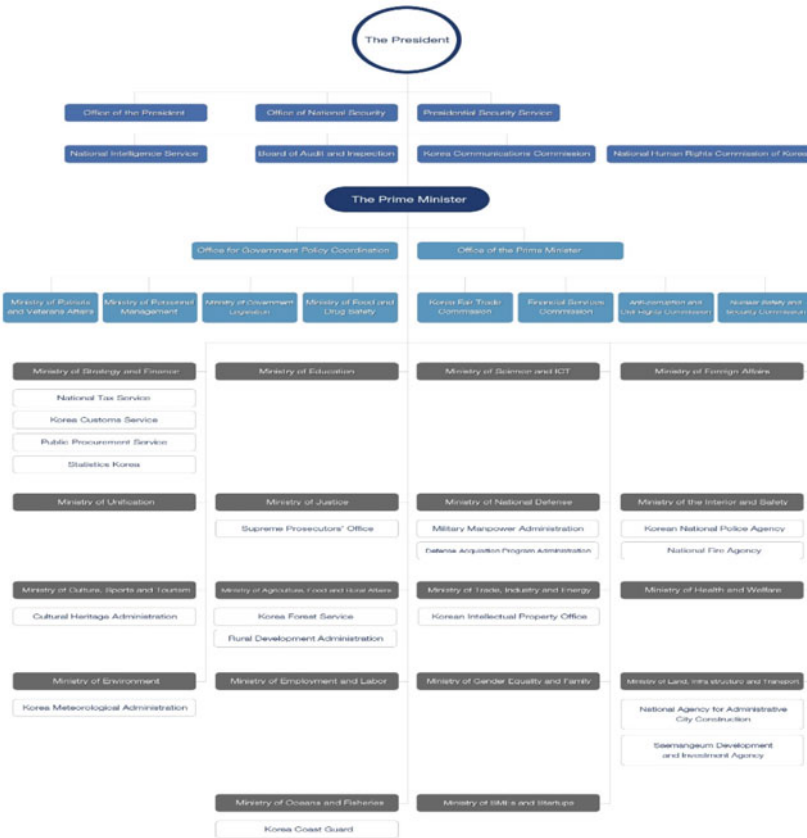


Fig. 1 Executive branch of the Korean government in 2021 (Source <http://english1.president.go.kr/President/Administration> [February 2, 2021])

Also, there is the Constitutional Court that checks issues of constitutionality upon the request of the courts, the closure of a political party, impeachment cases and etc. (the constitution of South Korea, 1987: article 111). For example, due to her role in an influence-peddling scandal and corruption, the national assembly impeached the first female president Geun-Hye Park and the Constitutional Court agreed with the decision.

In the Constitutional Court, a court head and eight judges are appointed by the president and they have to be qualified to be court judges (3 justices are nominated by the president, 3 justices are nominated by the National Assembly, and 3 justices are nominated by the Supreme Court chief judge). The court chief is appointed by the president from among judges by the approval of the national assembly (the constitution, 1987: article 111–112). All judges serve until retirement at age 70.

3.3.1 *Scope of Central Administration*

The central government grants administrative power to local governments to a certain extent. Governmental power in South Korea is far-reaching. Laws allow the central government to oversee and control the local governments through various executive regulations. Even though the local governments have the right to levy local taxes, the central government controls local spending and taxing. The Korean central government has various formal and informal ways to check local verdicts (Park, 2006).

3.3.2 *Administrative Position of Head of State*

The president implements laws enacted by the legislature and issues executive orders to implement the laws. The president can direct the State Council totally and supervise advisory organizations and executive agencies. Article 72 of the constitution allows the president to put major policies concerning diplomacy, the protection of the country, unification, and other issues concerning national destiny. The president has rights to introduce executive orders relating to agendas given to the president by Act and issues essential to implement Acts (the constitution, 1987: article 75). The president has a right to veto bills of National assembly but the president has to explain the reason of the objection in a written way. The National Assembly has the power to override the veto with a two-thirds majority (the constitution of South Korea, 1987: article 53).

3.3.3 *Ministries and Independent Agencies*

The president generally fulfills the executive duties by means of the State Council which consists of fifteen to thirty members including ministers and the Mayor of Seoul city. Ministers are designated by the president on the advice of the prime minister. The ministries are in charge of the formulation and execution of government policies in their respective policy areas. Ministers lead and supervise the executive ministries under their administration, deliberate on crucial national affairs in their respective policy areas, act on the president's behalf, and issue ministry orders as delegated by presidential orders (Kim, 2018). A National Assembly member can be chosen as a minister.

Ministers do not have their own political base and rely completely on the support of the president. The president selects and dismisses ministers, and has a right to reorganize the State Council. The standard term of a minister has constantly declined over the past two decades. Under Myung-Bak Lee's administration, this standard period of service was approximately one year. This high degree of turnover restricts ministers' independence (Croissant et al., 2016: 39).

In Korea, independent agencies and administrations have limited activities which are comparatively narrow and certain. Every agency (or administration) is generally headed by a vice ministerial-level administrator.³ In addition, the president appoints the agency (or administration) on the advice of the

³ Three of them are headed by assistant ministerial-level officials.

prime minister. The agency (or administration) works with specific ministries and with the prime minister. The affiliated ministers supervise the agency (or administration) (Kim, 2018).

3.3.4 *Local Agencies of Central Government*

The foundation and functional range of central administrative organizations is based on the Government Organization Act on July 17, 1948. The central administrative organizations contain ministries and agencies/administrations, special local administrative agencies, affiliated institutes, and representative administrative agencies (committees). The number of ministries and agencies/administrations is around 40. Every ministry and agency/administration might have special local administrative agencies under its authority, if needed. Special local administrative agencies provide particular public services in a specific area. There are around 5,000 special local administrative agencies: 40 for employment and labor service, 190 for tax service, 2,600 for public security, 1,900 for postal service, and 300 for other services. Also, central government organizations might set up their affiliated institutes, which include test institutes, medical institutes, cultural institutes, education and training institutes, consultative bodies, research institutes, or factories. There are about 480 affiliated institutes containing 80 organizations for testing and research institutes, 40 for education and training, 50 for culture, 10 for medicine, and 300 others. Both special local administrative agencies and affiliated institutes are considered subordinate institutes. For instance, the Ministry of Employment and Labor has the National Labor Relations Commission, Korea Employment Information Service, and Korea Employment Promotion Agency for the Disabled as its affiliated institutes, as well as six special local administrative agencies (Regional Employment and Labor Administration) and their local offices (40 district offices and 1 branch office). Due to the necessity which is that functions or responsibilities should be fulfilled independently, representative administrative agencies, such as an administrative committee, can be set up under the authority of the president, prime minister, or central government organizations. The representative administrative agencies try to coordinate interests relating to important policies competently, to systematically look for an agreement in the course of consultation, and carry out administration democratically and proficiently by controlling fairly, suitably, and properly (Kim, 2018).

4 LOCAL GOVERNMENTS

The local governments in South Korea have similar features to the national government. The local assemblies are generally derived from a parliamentary system and the electoral district is derived from administrative districts. Historically, the central government appointed the heads of local governments and local governments performed their functions as a continuity of the central government.

Soon after World War II, the modern history of local self-government began when Korea created its own constitution in 1948. The constitution has 2 articles about local autonomy (article 96 and 97). Article 96 basically recognized local self-government and gave local governments autonomy over their own properties and financial affairs. Also, the local governments managed matters within local autonomy and are assigned by the central government (Cho et al., 2010: 379).

However, the article also said that the local governments had to comply with laws and ordinances by national executive orders and legislation. In addition, article 97 stated that local autonomous entities have to possess assemblies; these assemblies' power, structure, and elections are determined by law. The function and organization of local autonomous entities were also determined by law. Based on these articles, the Local Autonomy Act was enacted in 1949. The act stated that the local government system had 2 levels which are upper-level local governments as Seoul metropolitan city and several provinces and lower-level local governments as city, county, township, and town (Yoo & Lee, 2020).

Until the 1961 military coup, this act was changed five times on the basis of political, social, and financial dynamics. Also, the implementation of the act was postponed in the Korean War. The first local election was held for lower- and upper-level council members without a local self-government system in 1952 and president Syng-Man Rhee won by using changes of the Local Autonomy Act and the election for his own interest. In 1960, the student revolution occurred against the Rhee government and the Democratic Party took power. The Democratic Party changed the Local Autonomy Act again on November 1, 1960 and local elections took place in December 1960. Executive heads of lower-level and upper-level governments and local councils were elected by popular vote (Cho et al., 2010: 379–380).

In 1961, Chung-Hee Park carried out a successful military coup and governed the country under authoritarian rules. Thus, local elections were canceled and the military regime deferred the functions of local autonomy. The local autonomy was deferred until the Tae-Woo Roh administration (1988–1993) disbanded the provision preventing local councils and local council members were elected in 1991. Due to the demands from the public, the Kim Young-Sam administration (1993–1998) executed some revisions on the Local Autonomy Act in March 1994. Relatively comprehensive local autonomy through inclusive local elections (executive heads and local council members of local governments) occurred in 1995 during the Kim Young-Sam administration. Since then, local elections have been held every 4 years. Nevertheless, major functions which had been in the hands of local government, such as policing and education, have been utterly controlled by the central government. Also, the central government has regulated some functions of mayors and governors in organizing the executive bodies of mayors and governors (Cho et al., 2010). Since 1995, much progress was achieved in the area of local autonomy, specifically the Geun-Hye Park administration launched the

Task Force on Finding Unreasonable Regulation in each local government to ease regulatory burdens on local business and many reforms were achieved (OECD-regulatory policy, 2017b: 73).

Until 2017, the Local Autonomy Act has also been amended 59 times including 2 total amendments, 35 partial amendments, and 22 related act amendments, and even today is still in the forefront of discussion. These frequent amendments to the Local Autonomy Act were not mostly made by the needs of the local residents, but rather they were made for the various political purposes of the parties in power and the central government. Thus, local autonomy was distorted as a policy instrument to strengthen the centralization of the government rather than to decentralize power (Yoo & Lee, 2020).

5 SCOPE OF LOCAL GOVERNMENTS

The Local Autonomy Act grants comprehensive rights to the local governments about autonomy. The Act (article 9) also pointed out functions in six groups to be used by Korean local governments:

- Functions pertaining to the jurisdiction, managerial, and administrative managements of local governments.
- Functions to uphold the general well-being of citizens.
- Functions pertaining to the promotion of industries such as: farming, forestry, trade, and business.
- Functions pertaining to local growth and the establishment and organization of environmental services.
- Functions to uphold culture, education, sports education, and art.
- Functions pertaining to civil defense and local firefighting.

Although rights are given to local governments, in reality they are restricted. At present, plentiful laws indicate the above functions as rights of the central government. According to the internal data of the Presidential Commission for Decentralization in 2009, there were 42,320 governmental functions. Among those, the central government still took the rights on the final decision for over 71.4% (29,980 functions) of them, while local governments are responsible for below 27.9% (11,817 functions) and functions given to local governments from the central government comprise 3.6% (1,523 functions) (Choi et al., 2012: 29–30).

6 LOCAL ADMINISTRATIVE UNITS

6.1 *Administrative Structure of Local Governments*

Within the autonomy levels, there are the metropolitan and local areas. There are cities, provinces, counties, and other administrative units such as towns

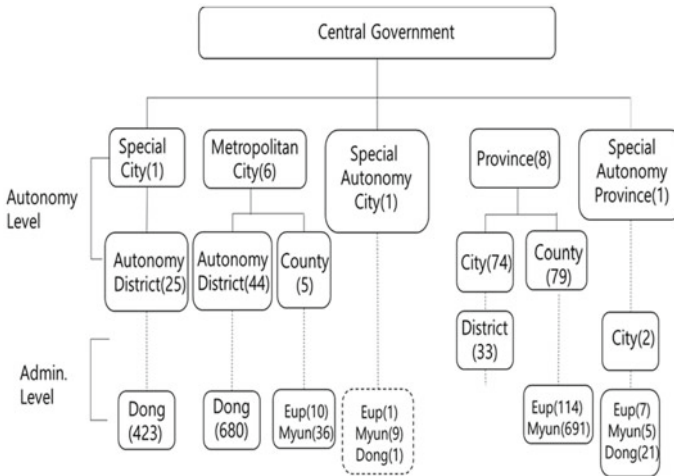


Fig. 2 Hierarchical Structure of the Central and Local Government (as of 2018) (Source Ministry of the Interior and Safety, Statistical Yearbook, 2019; Yoo & Lee, 2020)

(Eup), townships (Myun), and neighborhood associations (Dong), which are created by the central government only for the purpose of public service delivery (Fig. 2). The upper level of autonomy consists of a special city like Seoul, a metropolitan city where several million of the population live, and a province which includes cities and rural areas. In addition, the minimum population based on local levels is different (metropolitan city 1,165,000, province 1,550,000, city 43,000, gun 10,000, as of 2018) (Yoo & Lee, 2020).

According to the Local Autonomy Act (2017), local governments^{4,5} are divided into two categories:

1. Special metropolitan city, metropolitan city, autonomous metropolitan city, province, and special self-governing province (special autonomous province) as the upper level;
2. Si (city), gun (county), and gu (district) as the lower level. Lower-level local autonomies/governments (municipal governments) also have

⁴ A Special Metropolitan City Mayor for the Special Metropolitan City; a Metropolitan City Mayor for a Metropolitan City; a Metropolitan Autonomous City Mayor for a Metropolitan Autonomous City; a Do (province) Governor for Do (province); a Special Self-Governing Province Governor for a Special Self-Governing Province; and the head of si (city)/gun (county)/gu (district) for si (city), gun (county), and autonomous gu (district).

⁵ Eup (towns), Myeon (township), si (city), dong (neighborhoods), gun (county), gu (district), do (province), and city are Korean local authorities in Korean in the Latin alphabet. You should be careful that you can easily confuse city and si. One of them is city which is among the upper-level local governments and another is si (also called city) which is among the lower-level local governments.

subordinate administrative organizations (eups (towns), donges (neighborhoods), and myeons (townships)) as the community level.

Most local authorities do not have economic autonomy and depend on fiscal transfers that come from the central government. The amount of fiscal autonomy is depicted by the rate between the local budget and local tax income with the gap paid via central government subsidies. The degree of financial autonomy is between 80% in Seoul and 11.6% as an average for counties (guns)' governments and the overall average is about 45% (OECD, 2017a: 116).

6.2 *Organizations of Local Authorities*

With regard to the local government organizations, there are local councils as the legislative organization and the executive organization, where the head of the local government⁶ structure is situated. Citizens select all the members of local councils who work for a four-year period by direct and secret vote. A local council's duty is to represent residents in local government and it is responsible for ordinances. 1 chairperson and 2 vice-chairpersons are chosen by a secret vote by a local council for a city or do (province), and one chairperson and one vice-chairperson for si (city)/gun (county)/autonomous gu (district). They are selected from among the members of the local council. The chairperson and vice-chairpersons serve for two years. The chairperson is to represent the local council, organize proceedings, keep the council chamber under control, and oversee the affairs of the local council (Local Autonomy Act, 2017: article 48–49).

6.3 *Finance of Local Governments*

In 2018, the average level of financial self-sufficiency of local governments was only 53.4% and the average rate of local revenue was only 23.3% of the national total. In fact, local governments have financially depended on general and categorical assistance grants from the central government. This is the one big reason why the central government could control the locals. Overcoming financial weakness and political vulnerability, local governments have been struggling to get more income resources from the central government. As a result, local governments started collecting cigarette sales tax from 1984. After then local education tax was introduced, specifically, local sales tax and

⁶ A Special Metropolitan City Mayor for the Special Metropolitan City; a Metropolitan City Mayor for a Metropolitan City; a Metropolitan Autonomous City Mayor for a Metropolitan Autonomous City; a Do (province) Governor for Do (province); a Special Self-Governing Province Governor for a Special Self-Governing Province; and the head of si (city)/gun (county)/gu (district) for si (city), gun (county), and autonomous gu (district).

local income tax, which is 10% of national sales and income tax each, and were introduced in 2010 (Yoo & Lee, 2020).

7 NONPROFIT SECTORS

7.1 *Historical Background of Nonprofit Sector in South Korea*

In South Korea, the traditional Confucian culture and consecutive authoritarian governments delayed the development of an autonomous and independent nonprofit sector. But, over time the nonprofit sectors became popular with democratic developments. Nonprofit sectors have various names, which label organizations situated between the state and business as follows: nongovernmental organizations, civic movement organizations, nonprofit organizations, public interest corporations, civil society organizations, and nonprofit civil organizations. It is not simple to determine the boundaries of the nonprofit sectors, and there have not been any clear features to distinguish the state from civil society throughout the history of Korea. The nonprofit sectors' experiences in South Korea can be explained in three phases. The first phase covered the period before the early 1960s when the aim of South Korea was to protect the safety of the state. Mainly, during this time there were nonprofit organizations that were service-oriented and gave welfare services or implemented improvement plans for the poor, and most of them were funded by foreign aid. The second phase started with the authoritarian developmental state. It began from the early 1960s and continued until 1987 when the Great Democratic Movement took power from the authoritarian regime. The rapid growth in the economy caused the segregation of society and the expansion of a middle class. Also, civil organizations developed significantly and independent civil activities grew to a certain extent. In the early 1980s, a variety of civic groups such as women's groups and consumer advocacy groups had the opportunity to develop with the support of the middle class. During the democratic transition in 1985–1987, well-known advocacy civil organizations such as Lawyers for a Democratic Society, the Citizens' Coalition for Economic Justice, and the People's Solidarity for Participatory Democracy came to light. The third phase started with the end of the authoritarian regime in June 1987. This phase referred to efforts to expand public debate and participation in the formulation of public policy, increase the domain of human rights, and protect public resources from the pressures of economic development. After this phase, the nonprofit sector has become a strong and autonomous body in relation to the country and business sector. Nonprofit sectors have noticed the importance of their own power that is able to repress bureaucrats, politicians, and big businesses (Kim & Hwang, 2002: 1, 2, 3, and 4).

7.2 *Nongovernmental Organizations or Civic Groups*

After South Korea's democratic shift in 1987, gradually the political restrictions on civic organizations reduced. Human rights (such as freedom of speech and freedom of association), civil and political rights have advanced greatly over time. Also the South Korean rapid economic development has helped the civil groups refresh themselves over time and focus on human rights and public concerns (e.g., economic distribution, corruption, environmental protection, and bribery problems) rather than monetary concerns. Since the 1990s, there have always been dominant actors in the Korean public and political life in the form of civil organizations, such as the Korean Federation of Environmental Movements (KFEM), the People's Solidarity for Participatory Democracy (PSPD), and the Citizens' Coalition for Economic Justice (CCEJ). For instance, in June 2000, there were 2,193 registered nonprofit civic organizations. These organizations grew to 10,362 by March 2012. The Dae-Jung Kim and Moo-Hyun Roh administration helped civic organizations develop quickly and these administrations were positive to civil-societal participation in politics. Over time, these groups have strengthened and become increasingly effective. For instance, civil groups caused some laws, such as the National Basic Living Security Act in 1999, the Anti-Corruption Act in 2001, the Commercial Property Lease Protection Act in 2001, and the Bioethics and Safety Act in 2004 to be enacted (Namkoong, & Kim, 2018).

Nonprofit civil organizations were ratified by the act to support Nonprofit Civil Organizations promulgated in December 1999. The aim of the act is to uphold the efficient growth of nonprofit civil organizations and to expand the boundaries of the foundation for people's participation as to form volunteers and other activities for the benefit of the society (Onder,). It is also to promote the improvement of South Korean civil society by increasing public activities (Kim & Hwang, 2002: 8–9).

8 PUBLIC PERSONNEL SYTEM

Personnel administration includes all activities which are related to people in organizations. It uses human resources in order to achieve an organization's aims in the most efficient way possible. The public personnel system can be separated into the procurement of human resources, development, administration, and regulation.

Table 1 Four periods of public personnel administration (Cho, 2016: 82)

<i>1950s–1960s</i>	<i>1970s</i>	<i>1980s–1990s</i>	<i>2000s–</i>
Personnel Administration	Personnel Management	Human Resources Management	Human Capital Management

8.1 Overview of the Public Personnel System

The modern Korean public personnel system was firmly founded within the thirty-two years between the 1961 administration based on military authority and 1993—the year where Kim Young Sam and his Civilian Government came to power. In these years, the public personnel system was based on military influence. When South Korea officially applied for a local government system via election of local government executives, the Korean personnel system was both increasingly decentralized and liberalized at the same time. In South Korea’s history, we can divide the general public personnel administration into four periods (Cho, 2016) (Table 1).

8.2 Characteristics, Features, and Basic Structure of Public Personnel System

South Korea has approximately one million public servants, and the ratio of national to local public servants is nearly 64 to 36. They generally consist of three categories: public officials working in general service (technology, research, administration, etc.), public officials working in special service (judges, general prosecutors, teachers, police officers, etc.), and public officials working in political service (elected and appointed). Public officials have different ranks and in general service are composed of the Senior Civil Service and ranks from 3 to 9. Generally public officials are employed through open competitive examinations. In South Korea, every year recruitment examinations for ranks 5, 7, and 9 are administered respectively through written tests (once or twice) and interviews. The system is also designed to take professional and experienced citizens for all grades (including Senior Civil Service) when necessary. Because gender percentage is important, the number of candidates coming from a particular gender passing the exam is determined to be over 30% for each recruitment exam, and a quota system is used for disabled and individuals coming from low-income groups. Education and training are very important in the public service system. Both new and experienced employees take training and education. For instance, leadership education is given to public officials, which are promoted to deputy director (rank 5), director (ranks 3 to 4), and the Senior Civil Service. Public servants who violate rules and responsibilities may be exposed to disciplinary actions which include reprimand, pay reduction, suspension, demotion, and dismissal expulsion. Also, in some cases, monetary penalties are possible. In addition, in order to prevent

public officials from having illegal properties, public officials of rank 4 or over have to register all of their and their families' properties. And high-ranking officials in the Senior Civil Service have to disclose their properties. If their properties were untruly registered or were not registered, their ownerships can face monetary penalties or disciplinary actions. Moreover, during the first three years after retirement, public officials of rank 4 or higher cannot have a job at organizations related to agencies that they have worked at over the last five years (Cho, 2018).

8.2.1 *Career Civil Service System*

The career civil service system in South Korea looks for skillful and young people who work sincerely and with devotion. The main features of career civil service are based on hierarchical tradition, closed recruitment, and strict protection of job security. The future workforce is more important than current capacity. Public employees begin to work from the very bottom of the organization. Also, public employees are considered employees for all people. Korean civil service's typical features are guaranteed job security and political impartiality (Cho, 2016: 83).

The Korean public personnel administration system can be considered a rank-based combination of the career civil service and position classification systems. Public employees are chosen through exams founded on open and performance-related theories. Regular government service can be separated into 9 levels. The exams (different for each type of job ranging from prosecutor affairs to agriculture) are carried out by the minister of the Ministry of Public Administration and Security. Also, each central organization, related educational organizations, and the Ministry of Public Administration and Security (MOPAS) should train and educate public officials. MOPAS creates basic rules and policies in order to improve, assist, and assess their education process. In addition, MOPAS is in charge of commissioning employee education within South Korea and abroad. Every central administrative agency has a duty to train and educate its own personnel about its own policies and other related departments. Public office educational institutes are in charge of offering basic education for potential officials and professional education for incumbent public servants.

8.2.2 *Senior Civil Service (SCS)*

High-ranking public official groups started appearing in Korean civil service in July 2006. The Senior Civil Service eliminates the rank 1 to 3 public official ranks and the service decides to recruit citizens to the empty positions by the open recruitment system based on performance and duty. The SCS has four major characteristics. Firstly, the open position system, which allows outsiders to flow in, and the job posting system, which promotes competition among departments, boost the competition for empty senior positions by helping opening empty senior positions to outsiders so as to find competent public officials. Secondly, the SCS is inclined to advance the skills of senior

executives through an evaluation of proficiency, capability, education, training, and setting a minimum appointment period. Thirdly, the service encourages senior executives to improve or at least maintain the performance and responsibility of senior executives through eligibility screening, a job-rank system, and a job performance contract system. Lastly, the SCS uses an integrated management system when the SCS directs senior executives because they can conduct their duties by thinking of the national interest rather than their affiliated department (Cho, 2018).

8.2.3 *Merit System*

In South Korea, the merit system has been embraced as a basic personnel administration system. However, there have been many practices, such as some personnel management practices, which are against the merit system. Some personnel practices which are against the merit system were based on favoritism (regionalism, kinship, close relationship, party relations, etc.). This is partly due to the traditional Korean administration. But in South Korea party relations and political power transitions are not effective for manpower replacement compared to relations (friendship, kinship, family members, relatives, etc.). Also measures causing political impartiality are very strict and effectively prevent them from joining political activities. Irrespective of some practices against the merit system, the reason why the merit system is thought of as the fundamental personnel system of South Korea is that the constitution and laws are based on public office holdings, which is thought to be the basic principle of the merit system.

9 PUBLIC ADMINISTRATION REFORMS AND DEVELOPMENTS AFFECTING PUBLIC ADMINISTRATIVE STRUCTURE

From 1946 to 1960, in the initial stage of the foundation of the government after the Japanese colonial period, every single government system was newly introduced based on liberal democracy and republicanism. This was supported by the knowledge coming from the US. However, in reality, politics highly interfered with the civil service and patronage was still widespread due to the long historical tradition. Rapid industrialization and the growth of the civil service system took place under the authority of the authoritarian regime from 1961 to 1987. Political leaders were willing to reform the civil service so as to perform the initiatives and to make the bureaucracy more meritocratic. During the transitional period from dictatorship to democracy (from 1987 to 1997), there was an inclination toward small and efficient government. In spite of this effort, the size of civil servants grew. Since Dae-Jung Kim's administration, global tendency of new liberalism and public management reform have been highlighted drastically (Nam, 2016: 8–9).

In the past two decades South Korean administrative structure has changed significantly. Over time, the Korean administration implemented many reforms in order to transform their structure based on the new public management thought. Korea implemented public administration reforms with the help of foreign organizations and internal dynamics. Traditional public administrations, New Public Management, and post-New Public Management were the leading prototypes of reform of public administration system. Throughout the Dae-Jung Kim (1998–2003), Moo-Hyun Roh (2003–2008), Myung-Bak Lee (2008–2013), and Geun-Hye Park administrations (2013–2017), South Korean public administration was significantly transformed. Some important reforms they made were the reorganization of government ministries, the executive agency system, rationalization of public enterprises, the Open Position System, and performance management schemes as the evaluation system for government departments and downsizing (Han & Kim, 2017: 56).

9.1 *Basic Changes/Reforms Affecting Administrative Structure*

Korean modern public administration has transformed from a weak government system to an authoritarian bureaucratic state, which fosters rapid economic growth in the postmodern period. This authoritarian bureaucratic state can be titled as a developmental state, which means that state intervened the economy and society highly. Korea has a developmental state tradition with the strong state-weak society relationship, which is based on the ideological weapons of Confucianism and anti-communism, which made the process of the state-led development strategy easier. The authoritarian governments between the 1970s and the 1980s were preoccupied with rapid economic growth as a compensation for an absence of political legitimacy so as to get popular support. Economic development could not be reached by the state's coercive power to steer the economy and by the insulation of the pilot economic bureaucracy, like the Economic Planning Board and the perfectly synchronized institutional mechanism policy-making and execution.

After the democratic transition, South Korea was willing to embrace Western administrative values. South Korea had a lot of problems regarding globalization, liberalization, and the economic crises. To deal with these problems, South Korea planned to implement administration reforms in order to create good governance by creating a strong foundation for fiscal recovery and sustainable development.

9.2 *Administrative Reforms in South Korea Before the New and the Post-New Public Management*

1. **Dae-Jung Kim administration (1998–2003): New Public Management proposals layered with a powerful bureaucracy**

As mentioned before, due to the financial crisis in 1997, the Dae-Jung Kim administration had to implement reforms with a strategy of parallel development of democracy and the market economy. However, due to the developmental state and political restrictions, these reforms were not easy to achieve. Developmental state had an effect on the path of the reform process and affected public employees and society. Even if all the reforms took place, the strong traditions of the developmental state could hinder the applicability of New Public Management reforms (Han, 2005; P. S. Kim, 2000).

Even with the difficulties of the reform, the reform programs to reorganize the central government structure took place in 1998 and the programs cut down on the number of cabinet numbers from twenty-one to seventeen, with a 20% cutback in staff. The Ministry of Government Administration and the Ministry of Home Affairs were combined to create the Ministry of Government Administration and Home Affairs, which increased its power over local governments and other ministries using reforms. Also, the Dae-Jung Kim's administration aimed to adjust the government by setting up a regular government agency that was responsible for administration reforms. Hence, the Planning and Budget Commission was established in 1998 to observe reforms and later with the new name the Ministry of Planning and Budget, played a vital role in the reform. Since 2001, with the privatization of eight Social Enterprises, the Kim government has decreased the large number of public employees in the central government by approximately 16% or 22,400 civil servants. But the other reform was implemented to set up the Ministry of Women Affairs and the 2 positions of the Deputy prime minister for Economy and Human Resource Development in 2000. This action is against the expectation of small government (Han, 2005: 355–356).

2. **Moo-Hyun Roh administration (2003–2008): Reflective of New Public Management measures toward the emergence of post-New Public Management**

President Roh took the power in 2003 and set up the Presidential Committee of Government Innovation and Decentralization as a main apparatus for public sector reform. The committee was formed to involve civic groups and scholars in cooperation with bureaucrats. The committee considered administrative reform as an ongoing process through active interactions among bureaucrats, academics, and civic groups outside the government. It is clear that this reform by the Roh administration was one of the post-New Public Management ideas in public sector governance. This was against the

Kim administration's policy striving for a small and efficient government. The Roh administration focused on the aims and values that each agency adopted as their core responsibilities and gave an importance to the performance of tasks, rather than outputs. The Roh government put an importance on the needs of the public without severe governmental and personnel reduction. The total number of public servants increased from 889,993 in 2002 at the end of the Kim administration to 975,012 citizens in 2007 with the enlargement of nearly all agencies. The aim was to restructure the capacity of the country and represent the will of the public. Unlike the Kim government, nearly all of the state-run enterprises increased their role and size for their public interest rather than focusing on market-driven competition. Public value was very important for the Roh administration. Under the Government Performance Evaluation Act in 2006, which enhanced performance management, with the control of the Ministry of Strategy and Finance and the Ministry of Government Administration and Home Affairs over all the government departments unchanged, the prime minister's Office was added to use the power to review central ministries so as to manage public affairs.

3. Myung-Bak Lee administration (2008–2013): Return to traditional Public Administration with a mix of New Public Management and post-New Public Management

The Lee administration generally used the prime minister's Office, the Ministry of Government Administration and Home Affairs, and the Ministry of Strategy and Finance for reforms in a traditional bureaucratic manner. The Lee government was deeply affected by the financial crisis in the US and Europe in 2008. The rate of economic development decreased from 2.8% in 2008 to 0.7% in 2009, went up to 6.5% in 2010, and then decreased again to 3.7% in 2011, and 2.3% in 2012. With the effect of the financial crisis, the Lee administration desired to restructure reforms with the New Public Management idea, which was considered pragmatic for efficiency and competitiveness. The Ministry of Strategy and Finance planned and supervised the cutback management plan according to New Public Management strategies. The number of ministries reduced from eighteen in 2007 to fifteen in 2008, and the privatization of state-run enterprises was considered important to make its administration smaller and more efficient. 3 public enterprises were totally privatized; 34 had been reorganized and consolidated into 15, with a reduction of 22,000 employees since 2011. Performance management was not very consistent for the Lee government. The Lee administration pursued the path of the preceding two administrations: the prime minister's Office and supervising organizations, including the Ministry of Government Administration and Home Affairs and the Ministry of Strategy and Finance, supervised, observed, and, if necessary, rechecked the results of self-evaluation for all departments of the administration. The organizational face-lift of the Ministry

of Government Administration and Home Affairs shows the reemergence of a traditional or Weberian administration. This encouraged a Weberian administration to remerge but it is connected to post-New Public Management. In the meantime, the number of executive agencies decreased from the peak of forty-five in 2007 under the Roh administration to thirty-eight in 2012 under the Lee administration. In general, the administrative reform efforts during the Lee administration returned to traditional Public administration with an inconsistent combination of New Public Management and post-New Public Management (Han & Kim, 2017: 65, 66 and 67).

4. Geun-Hye Park administration (2013–2017): With “Government 3.0” (a brand of public sector innovation) as a slogan more open, transparent, competent, and service-oriented government and creative-economy initiatives

The Geun-Hye Park government had post-New Public Management in terms of the improved focus on integration and horizontal coordination in the government (Nam, 2016: 10). Also, with Government 3.0, the Geun-Hye Park administration focused on the ethics of openness, participation, collective intelligence, cooperation, and citizen trust. Mainly Government 3.0 was linked with application of information and communications technologies (ICTs) for enhanced and improved services and also with the opening and sharing of public data with people and enterprises. Also the administration has looked for ways to give more online services, to increase Koreans’ participation in the policy-making process and decision-setting, and to find solutions to different public problems via new technologies (such as cloud computing technologies, the Internet of Things, social media, and big data). The Geun-Hye Park administration was not successful in making the government smaller and enlarged the size of cabinet-level departments from seventeen in the Lee administration to twenty at the beginning of the Park administration. The number of government employees grew to 628,496 and 295,699 (This is from 609,573 and 277,122, in 2009) for central and local government officials in 2014 (Moon, 2018).

10 CURRENT PROBLEMS, RISKS, POTENTIAL SOLUTIONS, AND FUTURE PROSPECTS

Since the Republic of Korea had been established in 1948, Korea has been going through a long journey to political democratization, economic development, and administrative enhancement. This process has definitely influenced local autonomy, private markets, and civil society simultaneously. During that period of time, the constitution was amended 9 times, the Korean War broke out, and two military coups occurred. However, Korea has embraced democratic values and achieved economic success. But traditional undemocratic values remain strong in many ways and multiple goals have to be handled including more local autonomy, more administrative reforms, and more market freedom.

The Korean government has had a long history of public administration reforms in order to enhance accountability, competence, and effectiveness in the public sector. Though earlier efforts centered on nation-building and the industrialization period, in the last twenty years administrative reforms have centered on enhancing effectiveness and efficiency at both individual and organizational levels. South Korea has carried out NPM-oriented reforms in order to overcome the financial crisis since 1997 and the IMF helped South Korea in return for some requests (such as cuts in the public sector, reduction of the bureaucracy via privatization, downsizing). To a certain extent, thanks to such measures taken by the government, openness and competitiveness have been enhanced, democratic values have become more widespread in the public administration, and service quality has been more efficient.

However, Korean administration has a long way to go from the point of perpetual reforms. To do this, Korean administration has to develop more insight domestically and internationally. Other developed countries, international organizations, markets, and civil society are definitely the major actors who could help the governmental efforts (Islam, Bingöl, & Nyadera, 2020; Islam, Bingöl, Nyadera, & Dagba, 2021); Nyadera & Islam, 2020) Korea is the only country which has changed its status from a beneficiary to a donor since World War II. If Korea continues this public administration trend, then its future remains. However, in this process, Korea has to get along with its global neighbors and demonstrate more maturity (Table 2).

Table 2 South Korea public administration

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>	
Administrative history	Geopolitical situation	Strategic	
	Colonial history	Yes	
	Legacy of bureaucracy	Yes (Military/technocracy/Confucian values/the Japanese colonial administrative custom/American values)	
	Centralized bureaucracy	Strong	
	Role of military	Military dominant	
	Political culture	Conservative	
	Administrative culture	Participative	
	Professionalism	High	
	Politicization of bureaucracy	High	
	Dominant state ideology	No ideology	
	Legal structure	Nature of constitution	Written
		Origin of constitution	1948 & under the <u>American military occupation</u>
		Strong constitution	Yes
Constitutional rigidity		Yes	
Created by		Civil initiatives (Constituent Assembly)	
Revised by bureaucracy		Civil initiative (1987)	
Administrative judiciary system		Strong	
Central government	State structure	Unitary	
	Government structure	Majoritarian Presidentialism	
	Hierarchical structure	Strong	
	Local extension agencies	Limited to main areas	
	Central government	Yes & strong	
	Coordinating mechanisms	Existence of coordinating internal and external structure Strong	
	Transparent financing system	Strong	
	Monitoring	Strong	
	Independent regulatory agencies	Exist	
	Local governments	Financial autonomy	Weak
Political autonomy		Weak	
Council types		Council mayor	
Mayors		Elected	

(continued)

Table 2 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Intergovernmental relations	Decision making bodies	Exist Local Council
	Central tutelage/monitoring	Exist
	Subsidiarity principle	Does not exist
	Decentralization type	Deconcentration
	Logic for Division of tasks	Political
	Tutelage/monitoring	Strong
	Communication	Moderate Formal
Public personnel system	Civil services	Career based
	Scope of civil services	
	Recruitment and promotion	Competitive
	Nationwide exam	Exist
	Politicization in general	Moderate
CSOs/Civil society	Unionization	Moderate
	Size of Civil Society	
	Institutionalization	Moderate
	Partnership with the state	Moderate
	Political pressure/domination	Moderate
	Major financial revenues	
	Supportive national culture	Strong
Reform philosophy	Political regime & civil society relations	Moderate
	Civil society	Prestigious
	Dominant reform paradigm	NPM reforms
	Policy Transfer	Policy adaptation
	E-government reforms	Not completed
	Artificial intelligence (AI) reforms	Partial exist
	Influence of international actors	Not influential
New reforms (5 years)	Government 3.0	

Source Adapted and developed from Önder, M., & Zengin Ü. N. (2022). A framework for comparative analysis: Public administration across the globe. In M. Onder, I. N. Nyadera, & M. N. Islam (Eds.), *The Palgrave handbook of comparative public administration: Concepts and cases*. Palgrave Macmillan

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Islamic Republic of Iran

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I INTRODUCTION

The public administration scope consists of numerous external forces that impose major pressures on overall management and actions by various methods and networks. Societal principles, legal norms, governance, international-global agreements, history, and the health of the economy are considered external influences (Nyadera & Islam, 2020; Onder & Nyadera, 2020). These external influences combined profoundly affect public administration, promoting or stifling structural characteristics and efficiency (Jreisat, 2012). Public administration theory and practice have also been distinguished

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by attempts to recognize challenges and provide solutions, analyze systemic processes, as well as structural and individual efficiency. Administrative history is often viewed as “past” and hence, for record purposes only. Indeed, the past has always been structured as a sequence of events, leading ineluctably to the present in a predictable manner (Altowaitee et al., 2019).

Regarding public administration status in developing countries, Rigges (1964) states that the heterogeneous and overlapping characteristics of administrative structures in developing countries are induced by the existence and deeply entrenched traces of historical economic, political, religious, and social aspects. Consequently, an impression is sometimes created that the current management frameworks are autonomously invented around modern administration systems. A better understanding of the overlapping interrelationship between ancient cultural traditions and attempts to introduce contemporary administrative structures would therefore be needed to view these communities’ administrative culture (Islam et al., 2021; Islam, Bingöl & Nyadera, 2020).

Since the Persian Empire’s establishment around the year 525 BC, Iran has been subject to several different regimes, including Persians, Turks, Kurds, and Afghans. Despite the multiplicity of systems, almost all of them were monarchy systems until 1979, the date of the fall of the monarchy, and the declaration of the Islamic Republic of Iran and its political system. The uniqueness of the political-administrative system in Iran is that it is based on a mixture of democracy and theocracy (rule of the clergy) political system. In other words, the new state is based on the Shia interpretation of Islam specifically the Twelver Jafari school of thought. These theocratic and republican features created a complex political and administrative structure, and the essential legitimacy of the regime is based on the *Velayet’e Faqih* principle, which is regulated in the Iranian Constitution. This principle gives the supreme authority to religious leaders who control and supervise almost all countries directly or indirectly. Studying the public administration of the Islamic Republic of Iran means examining a public administration that is based on religious thought and culture and has no other unique examples. In order to determine the similarities and differences with other contemporary public administrations, it is considered important on its own in today’s public administration field studies. Such a study will serve to compare public administrations with different political foundations. On the other hand, it would be an instructive effort to scientifically analyze the relations of a system that emphasizes its difference from Western political values with all its political arguments and the general world system.

To understand the complicated and overlapping public administration in the Islamic Republic of Iran, this chapter will discuss the Iranian government’s administrative structure.

2 ADMINISTRATIVE HISTORY

Iran's ancient civilization has been around for thousands of years, making it one of the oldest civilizations in history. According to Farazmand (2001a); "The earliest experience of state tradition and administrative functions on a massive scale began around 6000 B.C. in Susa. As one of the oldest sites of ancient civilization, Susa began political and administrative life first as a city-state contemporary and rival to Sumer in Mesopotamia, then as the capital of one of the oldest empires of antiquity, Elam (p. 33)".

Thus, the history of the Iranian state and administrative system can be said to date back to ancient times. For example, the Elam Empire first introduced an administrative system to a class society or state society with three levels: the Padishahs, Regent, and Farmabardarans (Farazmand, 2001b). Farazmand (2001c), also contend that: "While the tradition of state and public administration has existed since at least 6000 B.C., the real practice of public administration on a state scale began with the federated Empire of Elam around the beginning of the fourth millennium. Furthermore, Public administration as it is practiced in Iran today is primarily an ancient Sasanian structure, reformed by the modern Western managerial and organizational principles introduced by the Pahlavi regime, and influenced by Islamic concepts and traditions. The Iranian traditions of state and public administration have thus been transformed from a powerful world-state Empire to a nation-state system of politics and administration" (p. 548). Historians posit that Iran's history can be divided into two main eras: The Pre-Islamic era and the Post-Islamic era.

2.1 *Pre-Islamic Era*

The Pre-Islamic era was a period of multiple ethnicities and religions. Iran at that time had a strong administrative structure. For instance, the Kingdom of Medes, which existed around 650 B.C applied a federal system to govern the tribes and established a strong central government and administrative structure. The Medes kingdom was an example for the successive states of Iran, especially Iskander the Great who conquered all the Iranian territories that led to radical changes in state structures including the economy, politics, administration, and judiciary. During the Sassanian Dynasty period, the country's administration had centralized tendencies and features that were known as the "National Union Era," and society was divided into four classes (the priests, warriors, secretaries, and commoners) (Ahin, 2010). Zoroastrianism also became the official religion of the Sassanian Dynasty and the powers and competencies of the clergy were increased by the rulers. They solved marital problems, judicial cases and managed the administration of the Madrasahs (Islamic schools). Finally, although the Pre-Islamic Iranian state had a centralist government structure, it was highly autonomous in structure (Farazmand, 2001b).

2.2 *Post-Islamic Era*

After the collapse of the Sassanids State in 636, the Iranians fell into chaos. There was no central organization or administrative structure in the region. Many central and decentralized states came into power, and at the end of the Islamic army's conquest, Islamic rules and traditions permeated every aspect of life such as social, political, and administrative dimensions. However, the Islamic rule did not change the Iranian administrative structure totally and many old administrative institutions continued with the new Arabic names. In fact, that Iranians reluctantly converted from Zoroastrianism to Islam. Furthermore, it caused dissatisfaction among Iranians, especially Abu Muslim, who carried out the Iranians' first great reaction to the Umayyad Dynasty and the Abbasid authorities. The Arabs executed him, and this event led to hostilities that still exists in contemporary relations between Arabian countries and the Islamic Republic of Iran (Ahin, 2010).

Many scholars, the greatest era in terms of administration was during the Safavids' reign (1501–1524). This period was attributed to Safi al-Din al-Ardabili, a traditional Sufi scholar and a follower of the Shafi'i school of thought. The founder was Ismael Mirza or the Shah Ismail, who went to Tabriz and defeated the tribes and made it his capital. The tenfold Shi'i doctrine was declared as an official doctrine of the State. He used all his power to impose his doctrine throughout Iran. His first son Tasheb succeeded him, and he completed what his father started, but chose the method of persuasion and influence in spreading the doctrine instead of violence and oppression. The wars between the Safavid Shiites and the Sunni Ottomans continued for a long time. External pressure, both from the Ottomans in the West and the strong Uzbek tribes in the East against the Safavids seemed to be an influential factor in unifying Iran and surrounding its people, the Safavid Kings, and the Shi'as. There existed a strong government with a central authority during the Safavid era. Moreover, strong ties were established with Western countries such as France and England and the development of trade through areas called Pazars (Ahin, 2008). By the 1760s, the Safavids collapsed due to various internal and external troubles.

Although Iran has made some progress in public administration, many reforms are still needed. Considering that the country is ruled by religious clergy, it is not surprising that Islam is an active force in the public administration of Iran. Gable (1959) argues that:

The only equality in Iranian society is before Allah. [...] Along with the family, the Islamic religion is probably the most important cultural influence in Iranian society. The Islamic faith is both a religious creed and a form of civil government. From the beginning, religion provided the form of government. The acts of civil government have religious sanction. Conditions are pretty much accepted as they are because they cannot be changed. Additionally, administrative practices and procedures are built largely on personal and subjective bases. (pp. 409–415)

2.3 *Qajar Dynasty Period (1795–1924)*

The Qajar dynasty period had important contributions to the administrative structures. In this period, the Iranians were influenced by the Western political regimes and administrative structures and had started to establish modern institutions. The Ministry of Foreign Affairs (Vezerate Dowlete Harece) established in 1818 was the first modern institution of Iran. Modern institutions also played an important part in Iran's administrative structure during the Qajar Dynasty. The industrial revolution influenced the State structure to keep up with the levels of the modern world. The Clergy or Ulama class supported the merchants and tradesmen. The Qajar Dynasty era also produced the first Constitutional Monarchy in Iran (Yang, 2015).

2.4 *Pahlavi Dynasty*

In 1925, the Pahlavi State was established and Mohammad Reza Shah who was the colonel of the Iranian army carried out a coup against Shah Ahmad Mirza al-Qajari, the last Shah of the Qajar state. Reza Khan Pahlavi began implementing a plan to modernize the country and to eliminate the influences of Shiite clerics, stressing the need to separate religion and the daily lives of the people. He began dismissing judges and Shiite officials and established a new system of modern education. He also raised a lot of controversies when he granted the Iranian women freedom and affirmed their right to learn and enter the university and made the hijab and veil optional for them. However, the Shah faced some international crises around early 1941 during the World War II due to his alliance with Nazi German. The British and Soviet troops quickly occupied Iran and the Grand Shah was exiled, which led to his son Mohammad Reza Shah Pahlavi taking over the country's running in August of the same year (Abrahamin, 2008).

Mohammed Reza adopted modernism just like his father but kept the British in control of the country's vital oil sector through the Anglo-Iranian oil company. In 1952, the National Front Movement, led by Prime Minister Mohammed Mossadeq and supported by the Communist Party, forced the Iranian Parliament to nationalize the Petroleum Company by establishing the National Petroleum Company. This annoyed the British Prime Minister Winston Churchill and senior state officials in Britain. In 1953, President Dwight Eisenhower's administration joined Britain, as London and Washington developed a joint plan to eliminate Mossadaq. Although the West had controlled Iran's oil for years, the Shah reached an agreement that would increase Tehran's share in each barrel of oil's revenues. However, with the outbreak of the oil crisis in 1954, cooperation and political and economic trust between the United States and Iran doubled. The rejection of the Shah by the Iranian's escalated and the intensification of demonstrations swept through Iranian cities.

At the end of 1978 and the beginning of 1979, the Islamic revolution intensified in Iran, the Shah did not find any way except violence to face the demonstrations against him. In June 1978, revolution leaders called on the masses to stop demonstrating and carried out a general strike for the people to stay inside their homes and to mitigate the impact of the security crackdown. During summer 1978, the Shah announced his willingness to provide more political freedom and called for early free elections within a year. Khomeini rejected the invitation and described the call as a trick, and by August 1978 the revolutionary forces organized comprehensive strikes that began with oil refineries and expanded to include most of the employees of the State sectors, including journalists, airline workers, railways, customs, and banks. By the end of 1978, the Shah announced his willingness to hand over the post of Prime Minister to the opposition, in which Khomeini rejected the offer and called for continuous demonstrations across the country (Abrahamian, 2008). One month after the Shah's departure, Khomeini returned from exile in France to the capital Tehran.

3 LEGAL STRUCTURE OF IRAN (CONSTITUTIONAL FRAMEWORK)

Imam Khomeini started setting the foundation for a new constitutional system after the overthrow of Shah Mohammad Reza Pahlavi. In that sense, in early 1979, he advocated for a referendum on the overthrow of the monarchy and the creation of the Islamic Republic. The referendum was held on March 30 and March 31, 1979 with 98.2 percent of the Iranians supporting the establishment of an Islamic republic. Under the slogan "Every no voice is a voice against Islam," Khomeini succeeded in gaining massive support from the people of Iran (Menashri, 1990: 129). The next step was to consider the constitution for the republic and a proposal was made to form a council representing the various political forces. However, the task was given to an elected council of religious experts. The constitution was approved after a referendum in December, 1979.

3.1 *First Constitution After the Islamic Revolution 1979*

The Constitution of 1979 has 175 Articles and twelve chapters dealing with various subjects which include general values, language, writing, history, the government's official science, people's rights, economics and finance, people's sovereignty and rising powers, legislative authority, Shura councils, government or leadership councils, executive power, foreign policy, judiciary, and public media. In 1979 (and in the Amendment of 1989), the introduction to the Constitution, like most major constitutions of revolutions, includes reference to the symbol and leader of the revolution and its struggle to overthrow the former regime. The preamble stressed that the religious content

of Khomeini's struggle had the greatest impact both in the creation of the revolution or in its success.

3.2 *Amended Constitution 1989*

Although the referendum on the amendment was signed on July 28, 1989, the main objectives of the amendments were as follows:

- To strengthen the President of the Republic's position relatively by abolishing the post of Prime Minister, especially since the relationship between the two incumbents was not positive.
- Determining the conditions of the candidate and his powers in preparation for the post-Khomeini phase.
- The constitution provided for the position of the Expediency Committee, which was established on December 12, 1988 based on a resolution by Imam Khomeini, to find a method for settling the conflict between the two wings of the legislative authority, the Shura Council, and the Guardian Council.

3.3 *Political Culture*

Buchta (2002), one must look at both the structured and informal systems of control to examine the power structure in Iran. The decision-making process is focused not only on the institutional framework of government but also on unofficial personal networks inside the political elite of Iran. Zonis (1976) suggests that it is not adequate to examine the decision-making process in a democratic environment where personal relations are greater than hierarchical ones.

3.4 *Emergence and Development of Bureaucracy*

Iran is among the countries that have one of the world's oldest practices of bureaucracy. There was a general theme during the Iranian Revolution of 1979 that the existing hierarchical system was authoritarian and should be abolished. There were changes in the bureaucratic framework following the success of the revolution (Farazmand, 2009). It is important to mention that Iran's post-revolutionary bureaucracy has undergone drastic reforms, but the latest changes went much further into the framework of the administrative regime.

4 POLITICAL INSTITUTIONS

Several political institutions regulate the State's executive, legislative, and judiciary. These institutions are related to each other's complex networks. The Supreme Leader is the center of these complex networks. These institutions

consist of the Supreme Leader, Islamic Consultative Assembly, President and Ministries, Council of Guardians, Expediency Council, Council of Experts, and Judiciary.

4.1 *Supreme Leader* (هـ بر ای ران) (*Not Elected*)

According to the Shi'a belief, prophets have two main tasks namely—revelation and government. Hence, the government must manage and direct the Ummah in the direction of the revelation. The Shia believe that the first task is the revelation belongs to the apostleship (risalet), but the second task, the government, belongs to the imamate. After the death of the Prophet, the revelation and apostleship ended. However, imamate continues because the ummah (the Islamic community) always needs someone to direct them in the direction of the revelation. The Imam possesses the same qualities as the prophets except for the revelation. Furthermore, the Imam is believed to be innocent just like a prophet. The people cannot decide who will be the Imam because it is believed that God directly chooses the person to be the Imam. The ummah is responsible by the Imam like a Prophet and the people are obliged to obey the Imam unconditionally. There are many velayet-e faqih (فقیه لایتو) theories in the Shi'i Islamic world. However, it is only in Iran that the velayet-e faqih theory has been introduced as a political theory and applied simultaneously. Ayatollah Ruhollah Khomeini, the founder of velayet-e faqih theory in Iran, gave a very important meaning to the Shi'i term vilayet-e faqih, which is the source of the legitimacy of the state in Iran (Abramian, 2008).

Supreme Leader, Khomeini's position after the Iranian revolution's success. His religious responsibilities involve referendums and rulings, but constitutionally, he has all the legislative powers that allow him to override and disrupt all official roles and decisions, with the exception of the Council of Experts' decision to fire himself. The Supreme Leader shall be chosen and elected by the Council of Experts (Article 111) of the Constitution. The Council shall be entitled to dismiss him if he shows that he is incapable of carrying out its legitimate duties or if it loses one of the elements of its eligibility provided for in the Constitution. The Constitution describes the Supreme Leader's duties and powers as follows:

1. Delineation of the Islamic Republic of Iran's general policies after consulting the Exigency Council of the Government.
2. Oversight into the proper implementation of the system's general policies.
3. Authorizing national referendum decrees.
4. Assuming the armed forces' supreme command.
5. The declaration of war and peace, and the armed services' deployment.
6. Assignment, discharge, and resignation acknowledgment of: On the Guardian Council, the fuqaha, the country's highest judicial body, the

head of the Islamic Republic of Iran radio and television network, the Joint Staff Chief, the Islamic Revolution Guards Corps supreme officer and the supreme commanders of the armed forces.

7. Attempting to resolve gaps between the armed forces' three wings and governing their relationships.
8. The Nation's Exigency Council resolves issues that cannot be addressed by traditional means.
9. Approving the declaration formalizing the people's election of the President of the Republic. The effectiveness of candidates for the Presidency of the Republic for the requirements laid down in the Constitution must be checked by the Leadership Council and, in the context of the first term [of the Presidency], by the Leadership Council prior to the actual elections.
10. Dismissal of the President of the Republic, without proper care of the country's interests, after he has been found guilty by the Supreme Court of a breach of his constitutional role or after a vote by the Islamic Consultative Assembly attesting to his incompetence based on (Article 89) of the Constitution.
11. To pardon or shorten the terms of convicts, on the advice of the Head of Judicial Authority, within the scope of Islamic requirements. The leader can delegate to another person part of his duties and responsibilities (Article 110, Constitution of Iran).

4.2 *Assembly of Experts (Majlis-e Khobregan* مجلس خبرگان رهبری)

The Iranian Leadership Experts' Council is one of the country's legislative branches that has the authority to maintain the Constitution and appoint the Supreme Leader of the Islamic Revolution in Iran. 70 members appointed the first council of experts in 1979 by the order of Khomeini to review the Constitution drafts in preparation for a referendum. The number of its members rose to 83 in 1982 to reflect the number of inhabitants. Each province has the right to elect an additional member for every 500,000 if its population exceeds one million. It currently consists of 88 members elected by direct election for a term of eight years. Qualifications required for candidates according to the Constitution are as follows:

- Each candidate has to be known as a religious person and to be morally trustworthy,
- Candidates have to have adequate information to make jurisprudence related to Fikhi issues,
- Understanding of epoch's social and political issues,
- To be loyal to the official regime of the country,
- Not to be involved in criminal cases.

4.3 *Majlis (Parliament): "Islamic Parliament of Consultation" in its original Farsi name (شورای اسلامی) (س ل ج م)*

The mandate of the Parliament is renewed every four years and includes 290 elected members through direct elections. This number includes religious minorities such as one from Jews, one from Keldani Christian, two from the Armenian community in Iran and one from Zoroastrians religious group. The Iranian Parliament is the only institution which is entitled to make laws. According to Buchta (2000: 25–29), the following conditions must be met by a parliamentary candidate:

- Iranian Nationality.
- He must be at least 25 years old and not more than 85 years old.
- Attain absolute majority.
- Obtain the approval of the Guardian Council.

4.4 *Guardian Council (شورای نگهبان قانون اساسی)*

The Guardian Council has the right to veto the Parliament's laws if it contradicts the principles of Islamic law, or the principles of the Iranian revolution following Article 98 of the Constitution. The Supreme Guide appoints half of its twelve members, while the head of the Judiciary appoints the other half. The President of the Judiciary is nominated by the President and endorsed by the Supreme Leader (Rakel, 2008). Other duties of this council are:

- Interpreting the Constitution of Iran,
- Observing the elections of the Council of Experts, Presidency, Parliament, and referendum,
- Supervising the candidates of mentioned elections in above.

4.5 *Expediency Council*

This council was not formed at first, but when the stalemate increased between the Assembly and the Council of Guardians, Komeyni proposed that the council resolve this kind of stalemate and preserve the regime's interests. In the case of a stalemate, the Expediency Council's decision is binding on both the Assembly and Council of Guardians. Expediency Council was established in 1988 to resolve the problems between the Council of Guardians and Islamic Consultative Assembly (Article 112) of the Constitution and make consultations with the Leader and resolve the system's problems. The council has thirty-four members all selected by the Supreme Leader.

5 CENTRAL GOVERNMENT

The Islamic Republic of Iran has a powerful central government legacy. A central political structure has existed throughout the territories of modern-day Iran evening during the Persian Empire, Sassanid, Safavids-Qajar Dynasties, and Pahlavi Dynasty. After the revolution, a few new ministries were established while others were abolished. Furthermore, some structural amendments were made in the 1989 constitutional reforms (Kurun, 2017) (Fig. 1).

5.1 Presidency (Elected)

The President of the Republic is considered the highest official in the country after the Supreme Leader of the Islamic Republic and is responsible for the implementation of the constitution and the Presidency of the Executive, except for the responsibilities of the Supreme Leader. According to the Constitution, the President of the Republic is elected for a four-year term using direct voting by the people.

5.2 Council of Ministers

Article 134 of the Iranian Constitution, “The leadership of the Council of Ministers is assigned to the President of the Republic who supervises the functions of the ministers; and by adopting necessary provisions coordinates the decisions made by the ministers and the Government Council; and with the cooperation of the ministers determines the programs of the government and implements the laws.” President of the Islamic Republic of Iran 2021, the government consists of nineteen ministries.

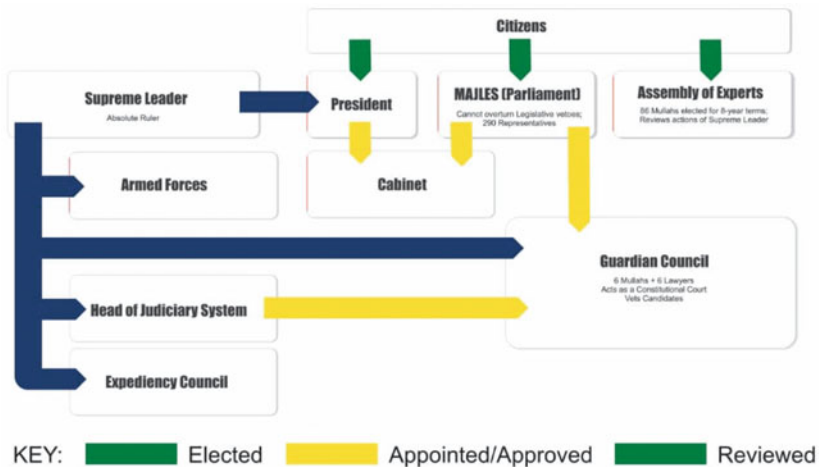


Fig. 1 Power Structure in Iran (Prepared by the Authors)

5.3 *Provincial Administration of Central Government*

The provincial administration is a part of the central government. The administrative structure is set up like a pyramid and refers to the regional divisions of the region. On this basis, Iran is classified into provinces (Ostans) each consisting of one or more counties (Shahrestans). These counties consist of at least one district (bakhsh) each comprising one or more dehestans. Local officials' power run from high to low along these lines, i.e., from provincial governors (Ostandars) to county heads (Farmandars) to district bakhsh administrators (Bakhshdars) and then to sub Districts dehestans (Dehdars), so that each official is responsible for the extent of the region under his control after the next level ranks just above administrator (Nabz Iran, 2014).

5.4 *Province Organization—Governor*

Iran's first division structure is provinces (Ostans) and as of 2016, Iran had thirty-one provinces. The governor is the highest representative of the central government and the province's highest authority and has wide powers throughout their territories. According to Article 103, the governor is appointed by the Minister of interior and the president with the council of ministers' assent. Because governors represent both the government and the state, they must implement state policies in provinces.

5.5 *County Organization/ Farmandar*

There are 429 counties in Iran. The head of the county is called Farmandar. It is hierarchically the top-ranked official of the central government institution. The county organization shows parallelism within the province organization. They also carry out parallel works with the governor's office such as political, administrative, and the judiciary. Besides, the fact that Farmandar is hierarchically affiliated to the governor is under the governor's orders and instructions. The Minister of Interior can appoint them with the assent of the governor from among the public servants.

5.6 *Administration of Bakhsh/ Bakhshdiv*

Sub-district administration is one of the organizations of the central government in Iran. The head of this unit is called Bakhshdar. Duties and responsibilities are like the governor and Farmandar in related districts. According to a law passed in 1983, the people who have a nomadic lifestyle can benefit from public services via a mobile sub-district (Bakhsh).

6 JUDICIARY

The task of the judiciary under the constitution is to achieve justice. It should be headed by a hardworking, fair, and knowledgeable person who is appointed by the Supreme Leader for five years. The judicial authority applies the legal provisions in accordance with the Jaafari Shia doctrine. The head of the judiciary shall be directly assigned, for a term of five years, by the Supreme Leader. Article 158 of the Constitution states that the head of the judiciary is allowed, in compliance with the statute, to appoint, replace, move, promote, and monitor judges and to take all related administrative decisions (Constitution of the Islamic Republic of Iran, n.d.).

6.1 *The Courts Structure*

According to Article 160, the Minister of Justice and the head of the judiciary must be appointed by the President from among the applicants proposed by the head of the judiciary. This sort of selection procedure demonstrates the degree to which the non-partisan judiciary interferes with the authority of the elected executive force. All matters regarding the relationship between the judiciary, on one side, and the administrative and legislative branches, on the other side, are the responsibility of the Minister of Justice (Rahmani & Koohshahi, 2016). The current judicial system includes general courts and specific courts:

1- **The Supreme Court**

The Supreme Court is the highest court of appeal of both civil and criminal cases. It is based in Tehran. Each branch has three judges. The judges must have at least 10 years of experience as a judge or a lawyer, or be an Islamic scholar, or have studied Islamic jurisprudence in a seminary for 10 years. In compliance with Articles 157 and 162 of the Iranian Constitution, all members of the clergy are authorities to be the head of the judiciary, the president of the Supreme Court, and the Prosecutor-General.

2- **The Court of Administrative justice**

The Court of Administrative justice which is under the Head of Judicial Authority is responsible for hearing the complaints, concerns and objections of citizens against public bodies, officials, entities, and to protect the rights of individuals (Article 173).

3- The Court of Administrative justice

This Court seems to be a mechanism for disciplining and investigating dissident clerics and dealing with all illegal behavior conducted by the clergy. Centered on religious law, the claims are to be contested. Another chamber of the Clerical Court handles appeals. In hearings closed to the public, the Court attempts the reformist clerics to deviate from Islamic doctrine and sentence them to drastic penalties, such as the death penalty (CIJL, 2002).

4- Military Courts

Article 172 states that these courts are authorized to prosecute crimes conducted by officers of the military services, the police, and the Islamic Revolution Guards Corps per army or security services. The military prosecutor's office and the military courts are both parts of the judiciary and are entitled to the same criteria as the judiciary governs.

5- Revolutionary Courts

This court prosecute and try any illegal action against the Islamic Republic of Iran's internal or external stability and degradation on earth, any disrespectful behavior against the founder of the Islamic Republic and/or its government, any plot against the government, or participating in insurgency or the destruction of public buildings or installations to confront the Islamic State (Rahmani & Koochshahi, 2016).

6- Press Courts

A branch of the General Courts that covers news-related charges is the Press Court. Article 168 of the Constitution provides that prosecutions for news offenses shall be held publicly and in the presence of a jury which composition is decided by the Law of the Press. The lack of legal security of freedom of speech and association under Iranian law is one of the key factors driving this attack (CIJL, 2002).

7 MILITARY ESTABLISHMENT

Like other official Iranian institutions, the military establishment is characterized by double state institutions represented by the Iranian army and revolutionary institutions represented by the Revolutionary Guards.

7.1 *The Iranian Army*

The Iranian Army or Artesh is considered the traditional military of Iran. Iranians ratified a new constitution in a referendum on April 1, 1979 that established a theocratic republic founded on velayat-e faqih with Khomeini as supreme leader, terminating 2,500 years of monarchical rule. Khomeini founded the Islamic Revolutionary Guard Corps (IRGC), centralizing the numerous militias that had built a single force dedicated to the new regime in conjunction with the Artesh (Nichiporuk, Green, Wehrey, Nader, & Hansell, 2009).

After the 1979 revolution, the Khomeini government sought to strengthen the army internally by launching an army clearance of officers in close contact with the Pahlavi family. Despite the success of the revolution in purifying the army and fully adapting it to serve the new regime, the army did not receive much attention from its revolutionary counterpart, which is clearly reflected in its budget of one-third of the Revolutionary Guard's budget (Cordesman, 1994).

7.2 *Revolutionary Guards*

The Guards of the Islamic Revolution of Iran must protect the achievements of the Revolution within the scope of its duties and areas of responsibility equal to the duties of the other armed forces established by law. The Revolutionary Guards are controlled by the Supreme leader who also appoints administrative cadres and the leadership. The number of personnel in the Revolutionary Guards estimated to be around 125,000, with 90,000 volunteers and 300,000 reserves carrying out their missions in land and air weapons, and trained to handle modern weapons.

Figure 2 briefly displays the Iranian army structure. The Supreme Leader is in control of both the IRGC and the Army (Prepared by the Authors).

8 LOCAL GOVERNMENTS

Governments in general are the bodies that have the power, legitimacy to impose the necessary arrangements, provisions, and laws to maintain security and stability in the community, and in the past the main responsibilities or functions of a government were to determine public needs, and justice. With the development and growth of societies, people's needs, and expectations grow as well. This development and growth through the history of administration and the move from centralization and total control of the central government to decentralization means that the central government transfers its powers in planning and administration to local governments and bodies who may be elected or appointed or a combination of them all. In all cases, the central government reserves the right to control, review, and provide guidance.

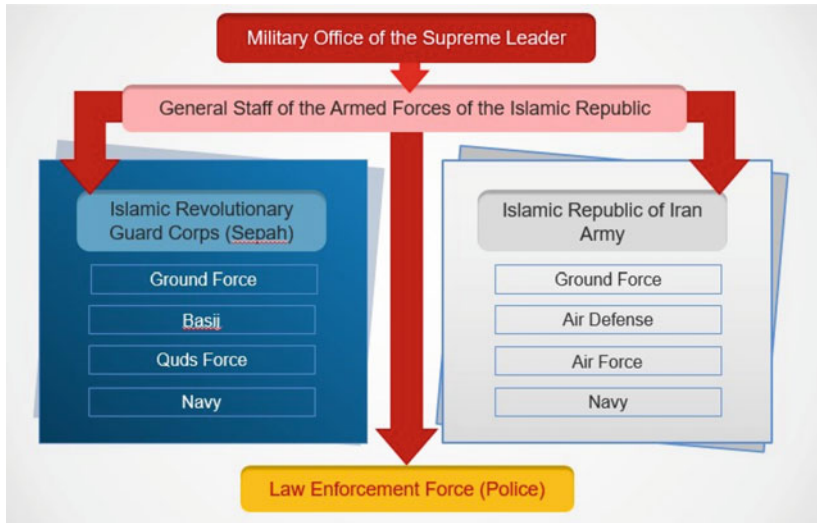


Fig. 2 Iranian Army Structure

One of the most crucial debates was about the degree of control and interference of the central government toward the local. This title covers the historical development, units, establishment, and financial structure, local government authorities and interferences with the central government in Iran.

After the 1979 revolution, to provide local people more authority and responsibility in local affairs, without the approval of the Constitution of the Islamic Republic, the law of the establishment of the local councils was approved by the Revolutionary Court of the Islamic Republic of Iran which was a step toward decentralization of the administration. This law ensures local elections at five levels including 1—Village Council, 2—Town Council, 3—District Council, 4—Province Council, 5—Higher Provincial Council.

8.1 Council's Formation

By public vote, city councils are elected to four-year terms in all Iranian cities and villages. As per principle 7 of the Constitutional Law of Iran, these city councils are “decision-making and administrative institutions of the State” along with the Parliament. This part of the constitution was not applied until 1999, when national elections for the first city council were conducted. Councils have several distinct roles, including the election of mayors, oversight of municipalities (Hosseini, 2014). The number of members in each of these councils depends on the size of the constituency of the council. Villages have as few as two members, while larger cities can have thirty-one or more members.

Tehran City for example has thirty-one (31) members of the city in addition to twelve members who are on standby (Articles 4, 7, and 68 of the Organization, Responsibility, and Election of Islamic Councils Law).

8.2 Main Councils

In the new Iranian laws, the 1966 Municipalities Act and its corresponding amendments are represented. It specifies that it must be the responsibility of an independent local entity, association, or council to make municipal decisions. The Ministry of Interior is the local decision-maker in the absence of such an entity. Before the creation of elected local councils in 1999, the mayors were an employee of the Ministry of the Interior. In compliance with the programs agreed by the central government ministries, in particular the Ministry of Interior and the Ministry of Housing and Urban Development, their roles were largely administrative in the context of introducing urban administration and delivering public services (Moussavi, 2010).

Figure 3 shows the phases of the local government in Iran include the Higher Provincial Council, Province, City, Village, Town, and District Council (Nabz Iran, 2014).

8.2.1 Supreme Council of the Provinces

The hierarchy of elected councils in Iran is the Supreme Council of the Provinces. The Constitution stated that the goal of the Supreme Council of the Provinces is to “ensure equality in the preparation of programs for the social welfare of the provinces, to ensure the participation of the people and to guarantee that such programs are carried out in a coordinated manner.” (Nabz Iran, 2014). According to Article 102 of the Constitution, the Supreme Council of the Provinces “has the right within its jurisdiction to draft bills and to submit them to the Islamic Consultative Assembly (Majles), either directly or through the government.” These bills are compulsory for Majles to review.

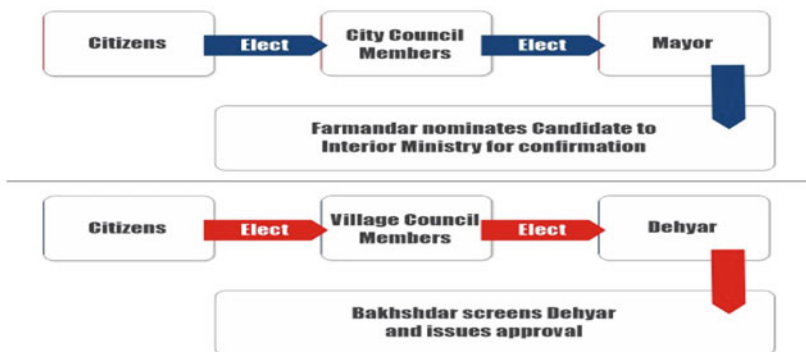


Fig. 3 City and Village Councils' Election Process (Prepared by the Authors)

Before sending the budget to the central system, it must first be sent to the Supreme Council of Provinces by the Management and Planning Association of Iran, so that the Council can verify that the budget is distributed around the provinces.

8.2.2 Higher Provinces Council

The Higher Province Council is the top decision-making body in Iran's local government. Its members are elected from among the members of the Province Council. The members of the higher province council are made up of two members from every two million people in every province, three members for the population over two million and four members for the Capital City.

8.2.3 Province Council

Elected city council members are automatically members of the Province Council. The city council representative in the Province Council shall be elected from among the council members in its first official convention. Every city council must have just one representative in the Province Council and a minimum of five members from the Province Council.

8.2.4 City Council

The city council's members shall be elected from the members of the town and district council. One person shall be the representative for every town and district council.

8.2.5 Town Council

The town council is also another significant unit of the local government in Iran. The number of town councils' members is from five to fifteen members. Municipalities and town councils are the unique non-governmental organizations that are officially involved in the Iranian local government structure. Besides these institutions, some other governmental corporations are involved in the affairs of urban administrations. The town councils and municipalities are responsible for governance within their territories. However, the municipalities and town councils are responsible for the management of the urban areas. Iranian cities and municipalities are under the authority of town councils (Hosseini, 2014). On the other hand, both the town council and municipalities obey the government and Ministry of Interior macro policies.

8.2.6 District Councils

Members of district councils are chosen from among the village council members, and each village may only have one representative.

8.2.7 The Village Councils

The primary administrative unit in Iran is the village. The concept of the village in Iran is a bit different from other countries. The village council is the lowest level of administration in Iran's local government. Approximately, there are

34,776 village councils across the country. The village council has two main roles. Firstly, the council serves as a self-governing local structure to respond to local needs and to perform local tasks. Secondly, the village councils also serve as a duty performer of the central administration. Without consideration of the village's size and population, all of them have the same statutes and their power and structure are determined by those statutes. (Hossein, 2014).

8.3 *Local Councils Election*

At the municipal level, the local council is an independent council of people. The city council's executive body comes under the framework and authority of the local administrative unit. Therefore, given its core duties, which include electing the mayor, authorizing local budgets, and managing and controlling the progress of the municipality (Tajbakhsh, 2003). Municipalities are public organizations, that are self-determined from the central government, and they get most of their budget from sources like public taxes, special taxes, service fees and income from for-profit organizations, financial investments, government assistance, philanthropy from citizens and private organizations (Organizational Structure, Article 29). Per each electoral district, three members are elected to the City Council. A committee consisting of the farmandar or bakhshdar is responsible for the delineation of electoral districts at the city level (Nabz Iran, 2014). Local council elections took place five times so far during the years 1999, 2003, 2006, 2013, and 2017.

Mayor and Dehyar are elected by the public, while the chief governor (Ostandar), deputy governor (Farmandar), district governor (Bakhshdar), and deputy district governor (Dehyar) are appointed. Regarding the budgeting process and responsibilities, the municipal budget should contain a five-year strategic plan and policies with clear goals and needs for the city's priority development and service units. As for financial responsibilities even if the Mayor delegates them to another employee the responsibility still lies on him. The mayor has the ability to increase or decrease the budget by ten percent for each activity, the mayor with the accountant of the municipality is responsible for planning, proposing. Monitoring the spending of the budget, every ten months the mayor should submit a budget proposal to the council. By the mid of each month he/she is required to submit the income and spending accounts from the former month to the municipal council. Every six months, the municipality must publish a complete list of all income and spending as well as a comprehensive account of all the municipality's work (Municipality Law, Article 71).

9 CENTRAL-LOCAL GOVERNMENT RELATIONS

After the revolution, the government agreed to establish the city council to shift authority from the central and local government. The legislation also granted retrospective jurisdiction to the central government for the acts of

local councils. According to the local decision-making mechanisms in Iran, the Ministry of the Interior links local governments with the central government. Parliament members may place pressure on local decision-making and control it. Therefore, it can be inferred that local government roles and powers are minimal. They are not even permitted to play an active role at the local level in legislation or decision-making, city planning, and service delivery (Shahrabi, 2019).

With reference to supervision and control, central government entities track local administration decisions vertically and horizontally and local councils, which affect decision-making at various local levels. However, in provinces, actions are managed in a vertical way and projects are not organized horizontally. While there are demands for the decentralization of administrative positions to the lowest levels, including at the level of the district, city, and town, as well as the transition to municipalities of public service and maintenance obligations, there is still a large divide between what is expected and reality (Shahdani et al., 2012).

The Iranian government introduced a local financial self-sufficiency law in the year 1988 aimed at phasing out all transfers and central aid to municipalities. The bill was seen as a way of enabling communities to ensure local economic prosperity of their own. Many smaller metropolitan communities have failed to fulfill their growth plans under this initiative. Among the most important tax system changes to control municipalities was the Tax Integration Act in 2003. The goal was to refocus the processing of tax obligations, thus increasing the size of local revenue.

In line with legislative requirements, incomes for local government comes mainly from three sources, output from public services, public lands, local taxes, borrowing, private sector, and state support. There are different types of municipal services available, however, they do not all have the features of sustainable earnings. Income sustainability allows these items to be of relative longevity and, secondly, the collection of these taxes does not impede and harm the nature of the region. Therefore, it can be said that some amount of transparency, regulatory and responsibility of local comprehensive administration, can be observed although there is more room for improvement. What is viewed as a weakness in Iran's municipal management system is the existence of features such as centralization and externality of private sector operations.

A complicated situation has contributed to the difference between elected and appointed positions, such that it is always difficult to form an interpretation of the powers and duties of government officials and institutions. As stated before, in the case of towns and small towns, the Minister of the Interior would approve the election of the Mayor by the Council, although it is an elected position (Nabz Iran, 2014). Regarding local councils' dissolution, on the grounds of Article 106, if the Council takes steps against its obligations or against the general policies of the government, the dissolution of the Council shall be considered by the Governor to the Province Dispute Settlement Board through a written report. Nevertheless, if there is an appeal to the

dissolution, each of the dissolved councils may lodge a case with a competent judge, who will then provide a final legal ruling on the case (Hossein, 2014). After the revolution, the Iranian government applied created laws and tried to implement them to transfer and delegate power from the central to local government.

In this context, Iran's administrative structure is divided into 30 provinces (Ostan). The provinces are further divided into districts, sub-districts, and villages. These administrative units are headed by officials appointed by the Minister of Interior (Sinkaya, 2011). The administrative division of Iran is divided into 31 provincial administrations. It differs from the familiar system of provinces. The classification, called Ostan in Persian, is a state-like structure and is determined on a regional basis. Each Ostan is divided into districts called Shahrstans. Shahrstans consist of two or more sub-districts called Bakhsh. Bakhş is divided into rural sub-districts, namely villages called Dehestan (Dik, 2016). Each Dehestan consists of a Rusta, i.e., a hamlet. The town also refers to the municipal organization.

10 PUBLIC PERSONNEL SYSTEM

The Personnel System of Iran stretches back to ancient times. In ancient times, personnel was employed generally by the state to collect taxes and carry out administrative and military services. Also, classifications of occupations were made, such as religious, fiscal, and military. Moreover, after the constitutional movement in Iran, the Personnel System began to be regulated by laws. Most importantly, the Assembly affirmed the first Employment Act of Iran in 1922. Ahin (2008) states that the Employment Act was composed of five sections including "Recruitment", "Service degree and promotion", "Administrative judiciary and punishment", "Retirement", and "Special Articles".

The 1922 Law of Employment was very comprehensive and modern compared to other contemporary countries but after World War II, many experts and consultants came to the country and affected the prevailing personnel regime. In 1966, the first public employment law was developed. Today, Iran's Personnel System is mainly based on this text. This law was composed of eleven chapters and 151 Articles. According to Ahin (2008), there are two types of employment which in Iran namely—

1. The personnel who are in the scope of Public Employment Law
2. The personnel who are out of the scope of Public Employment Law

Some high-level public officials are out of the scope of the Public Employment Law. These are the president, first vice president, ministries, and auxiliary of ministers and executive assistants. On the other hand, personnel who are in the scope of Employment Law are classified into five groups which are—public servant, contract personnel, temporary personnel, and Hukmi personnel.

10.1 *Public Servant*

The public servant is the person who is employed according to the Public Employment Law in one of the ministries and other state institutions. Also, according to the third Article of the Public Employment Law, the public servant will be employed in two ways either through exams or competitions. The Administrative and Recruitment Organization of the country holds the exam and competition processes. According to the seventeenth Article, after the exam the personnel will be regarded as a candidate public servant for a minimum of six months and a maximum of two years. Regarding retirement, any person who has worked for thirty years can retire at the age of fifty-five. In other circumstances, a person can retire at the age of sixty. However, eight percent of salaries from public servants are withheld by the government and paid to them when they retire. The following Table 1 shows the number of Iranian government employees from 2009–2020.

11 NGO's/CIVIL SOCIETY

A variety of programs are being carried out by civil society groups in Iran. This includes topics pertaining to women, children and youth, environmental protection, professional organizations, fertility and safety, and technology and science. While the Islamic Republic's Constitution includes laws that allow civil society organizations to be created, the legislation is not clear in this regard. Therefore, registration as an NGO becomes an exhausting process and it may take many years to complete. In addition, none of the regulations

Table 1 Government employees by employment law, status in employments at the beginning of the year in Iran

<i>Total Country</i>	<i>Grand total</i>	<i>Under civil service code and other employment rules</i>			<i>Under Labour Law</i>
		<i>Total</i>	<i>Permanent</i>	<i>Temporary</i>	
2009–2010	2,169,591	2,068,747	1,716,561	352,186	100,844
2010–2011	2,065,298	1,973,104	1,637,676	335,428	92,194
2011–2012	2,052,998	1,961,074	1,452,292	508,782	91,924
2012–2013	2,052,998	1,961,074	1,452,292	508,782	91,924
2013–2014	2,284,879	2,164,908	1,510,597	654,311	119,968
2014–2015	2,384,577	2,219,497	1,585,331	634,166	165,080
2015–2016	2,331,458	2,169,695	1,543,586	626,109	161,763
2016–2017	2,341,726	2,177,609	1,571,957	605,652	164,117
2017–2018	2,332,099	2,177,694	1,567,631	610,063	154,405
2018–2019	2,276,928	2,141,778	1,534,578	607,200	132,905
2019–2020	2,279,151	2,146,246	1,527,855	618,391	132,905

authorize political activities to be undertaken and it becomes difficult to function independently of the government. For example, the organization needs to report all modifications and/or activities to the Ministry of Interior to seek permission (Samur, 2008).

It is important to provide a historical analysis of Iranian civil society's turning points for a deeper understanding of its formation and development. The Volunteer Activists Institute (2018) listed the main historical turning points of civil society groups in Iran as follows:

1. Between the years 1979 and 1981, the Pahlavi dynasty's fall displayed the first historical floodplain for Iranian civil society. Nevertheless, during this time, civil society gained popularity, and Iranian people established a wide variety of vibrant civil society groups and organizations.
2. It is possible to mark the second key moment as Iranian society's revolutionary populist era. In 1981, the new administration further outlawed and undermined civil society organizations and instead rallied the masses in its favor, after a period of military struggle between some opposition parties and the new government.
3. The Moment of Liberalization and Transition from 1997–2005. This time may be called Iran's democratic liberalization, perhaps the most critical aspect of this period is the initiative of Khatami for the notion of a civil society movement. We may conclude that those years have seen a boom in the operation of NGOs in various fields.
4. The sixth historical phase of post-Revolutionary Iran took form and continues to date after the 11th Presidential Election in 2013 as well as the takeover of the new government. This era has also seen concerted political activity replacing the last period's limited, closed group or hidden activism. The start of the Movement of the Poor by 2017, which took all Iranian society's actors and observers by shock, was also a significant development, since the 1979 Revolution for the first time.

Overall, it can be said that there is a complex and asymmetrical relationship between the government and NGOs. The relationship consists of animosity and threat, particularly on the part of the state. The state has a diverse collection of instruments, ranging from legislation to arbitrary detention to discourage NGO operations. It is this situation and the meaning of this relationship that politicizes even the most apolitical NGOs (Samur, 2008).

12 RECENT ADMINISTRATIVE REFORMS AND DEVELOPMENTS

At the center of the most critical problems in the Middle East today, including Syria, Iraq, and the Kurdish conflict, Iran is a key player. However, although they are already experiencing difficulties at the internal level, Iran is not

entirely prepared to meet potential threats and Iranian decision-makers are mindful of that. They are seeking to reconcile internal obligations and commitments in foreign policy. The present government aims to encourage economic growth at the domestic level, maintain the rule of law to suppress local activists, and prevent public administration bureaucracy.

Iran's history in general, and Iran's administrative and political history in particular, has a significant impact on the formation of the constitutional, political, and administrative structure of the Iranian public administration system. In Iran, which is one of the oldest civilization centers, there is a very old state tradition in the classical sense. The modernization efforts of Iran, which established many empires such as Achaemenids, Persians, and Sassanids, can be considered quite new. There have been a series of reforms made in the public administration of The Islamic Republic of Iran. The reforms made before the revolution were mostly carried out for the purpose of modernization and, in a sense, Westernization. The reforms made for a period of about ten years after the revolution are the reforms of Islamism. The reforms made in the 1990s are, in a sense, post-war economic and political restructuring reforms. However, the reforms made since the 2000s are, in a sense, parallel to globalization and neoliberal reforms, and they are gaining more weight day by day. What is desired to be done with these reforms is to ensure integration with the world, especially in the field of economy, without pushing aside traditional and religious values.

12.1 *E-Governance*

The need to develop e-government services, which are accepted in many countries for reasons such as increasing efficiency and productivity in public services, strengthening democracy by ensuring participation and accountability, and increasing service quality, is also accepted by all segments in Iran. E-government is being introduced in Iran to develop administrative systems (in the form of evolution plans) and bring about changes in government applications, fertilize work processes and procedures, and increase accountability and clarity. Within this pan, the government of Iran has promoted e-services based on the concepts of accountability and participation and simplified the service delivery process.

Iran Development of Information and Communication Technology Plan (TAKFA) is one of the first executive systems, established in 2000 by the country's government sector to develop information technology and implement e-government (Gilaninia, 2012). This system was created with the ambition of coordinating the activities of the executive branch. However, on the proposal of the Planning and Administration Organisation, the Supreme Council confirmed the plan for the establishment of e-government on 2 July 2000. The aim was to provide access to information in the economic, social and cultural spheres. The objectives pursued by this plan were to automate activities, increase employment opportunities, improve the quality of services to people with maximum supply, increase the quality of decision-making at various levels, provide personalized services, reduce costs, increase efficiency

and effectiveness in various sectors, quickly and accurately establish and expand information between implementing organizations. The necessary resources for the project were included in the 2001 budget. (Sarpoulaki, 2008).

However, it has been noted that the expected goals for e-government have not been realized as originally planned. Iran's e-government performance is low in international rankings, and the positive results of e-government applications in the country cannot be mistaken for the functioning of the public administration system at the desired speed (Gilaninia, 2012). Government agencies in Iran need to improve their performance in terms of meeting e-government assumptions (better services to citizens and better accountability). In many countries, especially in the developed world, amazing changes have taken place in the area of e-government, despite the challenges faced in its implementation. However, the aim is not to raise the rate of e-government adoption in Iran to the level of other countries, but to learn from the experiences of these countries in order to find more appropriate and logical solutions that will promote the adoption of e-government and remove obstacles. The answer to successful implementation of this process lies in the commitment of all relevant authorities and decision-makers, both public and private, such as administrative departments, educational institutions, financial and political authorities, legislators and the media. The path to successful implementation of e-government and computerization of existing systems requires fundamental agreements to utilize the available opportunities and resources. This process requires the efforts of government organizations for the benefit of citizens, business partners, the public and private sectors.

12.2 Provincial Reform

In the provinces, the government has attempted to support the local economy. According to Sharq Forum (2017), the support of the government is aimed at achieving two goals which are:

1. To strengthen the provincial economy, by streamlining the decision-making process through delegation. Local administrations will have more economic decision-making powers and will be able to operate independently of the Ministers of the central government in Tehran and avoid excessive bureaucratic procedures.
2. To meet the demands of Iran's ethnic groups, most of the population is in sensitive border areas. For instance, the government has allowed the teaching of the Kurdish language in Kurdistan as a response to the feelings of Kurdish nationalism and the status of the Kurdish language in Turkey. Azeri language is also being considered by the government to be taught in the Turkic regions of Iran. However, little is known about the situation with other local languages in Iran, such as Arabic and Baloch. It remains to be seen whether Kurdistan will remain an exception or the beginning of a new chapter in Iranian politics toward its ethnic groups (or nationalities).

13 CONCLUSION

In conclusion, the Islamic Republic of Iran's political system cannot be understood without reference to the general contexts in which the Iranian revolution broke out in 1979 which in turn established a distinct political system. It is also important to emphasize that the Islamic revolution in Iran at the end of the 1970s took a different course from the revolutionary model of the Third World that represented the revolution of pro-Western capitalist regimes and the establishment of totalitarian socialist regimes. Khomeini did not intend to revolutionize the overthrow of the monarchy and establish a state and a political system based on theocratic political theory. For the first time in the Shiite sect's history, the political and religious positions have been merged. Today, Iran is undoubtedly a country that cannot be ignored in any regional arrangements because like other players in the region, Iran also seeks to strengthen its power and influence to safeguard its security and stability (Table 2).

Table 2 Public Administration of Islamic Republic of Iran (Prepared by the Authors)

<i>Themes</i>	<i>Islamic Republic of Iran</i>
Administrative History	Can be traced to around 6000 B.C. in Susa. However, many scholars are of the view that the greatest era in terms of administration was during the reign of the Safavids (1501–1524)
Constitutional Framework	It has, over the years, been influenced by Iran's ancient civilization, Shariah (Islam Law), the Supreme Leader, the military bureaucracy, and liberal reforms
Central Governments	The central government has strong control over the local government. It provides much of the revenue for local government and appoints some local government officials
Local Governments	The local government in Iran include the Higher Provincial Council, Province, City, Village, Town, and District Council. Local people have more authority and responsibility in local affairs. Moreover, local elections are held at five levels including the Village Council, Town Council, District Council, Province Council, and Higher Provincial Council
Intergovernmental Relations	The central government entities track local administration decisions vertically and horizontally and local councils, which affect decision-making at various local levels. The Ministry of Interior serves as the link between the local governments and the central government

(continued)

Table 2 (continued)

<i>Themes</i>	<i>Islamic Republic of Iran</i>
Civil Service Systems	There are two types of employment which in Iran namely—The personnel who are in the scope of Public Employment Law and the personnel who are out of the scope of Public Employment Law High-level public officials are out of the scope of the Public Employment Law such as the president, first vice president, ministries and auxiliary of ministers and executive assistants. On the other hand, personnel who are in the scope of Employment Law are classified into five groups which are—public servant, contract personnel, temporary personnel, hukmi personnel
Reform Philosophy	Iran has witnessed some constitutional and administrative reforms over the years especially after the revolution. However, the government is very cautious and slow with reforms which is evident in many spheres of life in the country
Civil Society/NGOs	There is a complex and asymmetrical relationship between the government and NGOs. The relationship consists of animosity and threat, particularly on the part of the state

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The State of Israel

Israel Nyaburi Nyadera and Michael Otieno Kisaka

I INTRODUCTION

Geographically, Israel is located in the Middle East. It is bordered by Lebanon in the North, the Mediterranean Sea to the southeast, Syria to the Northeast, the Gaza Strip and Egypt on the southwest, the West Bank and Jordan to its east, and the Gulf of Aqua to the South. By law, Israel is a Jewish state and according to the World Population Review, had a population of 8.4 million in 2019. A 2013 report by the Israel Central Bureau of Statistics indicates that the population demographics include 75% Jews, 21% Arabs, and 4% ‘Others’ (ICBS, 2013). The country has a return Law that guarantees individuals of Jewish descent the right to come and settle in Israel. 73% of the citizens were born in Israel, 18% immigrated from Europe and North America while 9% came from Africa and Asia. Half of the Jews in Israel today originate from the former Soviet Union, Europe and some are descendants of Ashkenazi Jews.

Since the country was established in 1948, it has been characterized by a Parliamentary system of government with an Executive, Judiciary, and

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unicameral Knesset. There is no formal constitution but there are laws such as the Israeli citizenship act (2013), the Basic Laws of the Parliament and Declaration of Establishment (1948) that pose a similar effect. The country is divided into six administrative units namely: North, Tel-Aviv, Haifa, Centre, South, and Jerusalem. Local authorities are divided into three levels. Cities are administered by a municipal council, localities that are not big enough to be considered cities are under the local council while localities are under local councils too (Knesset Lexicon, 2011). There are 75 Municipalities, 256 local authorities, and 53 regional councils in Israel with two regions considered as industrial local councils. For three decades now, Israel has been undergoing a process of decentralization that aims to achieve the principles of good governance, such as transparency, accountability, and financial responsibility within its public administration sector.

Research conducted regarding public administration in Israel within the last three decades shows that on one hand the system is similar and a continuation of a homogeneous model popular across the Mediterranean basin and on the other hand there are some features that are unique to the Israeli case. History, culture, and reforms that began with the adoption of the New Public Management in the mid-1990s have shaped the country's PA system. There are also traces of the European model of public administration in Israel given its long association with the bloc and its membership to organizations such as the OECD thus making it an interesting and unique case to examine. In addition, public administration in Israel has certain peculiar characteristics that make it appear complex. The origin of these peculiarities can be examined from two broad dimensions. The first explanation is the existence of very strong non-executive institutions (specifically the Supreme Court and the Parliament—*Knesset*), which are capable of putting pressure on the operations of the entire state by strongly influencing the choices made by the government. Furthermore, the Supreme Court and the Knesset are important entities in determining the nature, functions, and responsibilities of institutions and actors involved in the public administration processes as a whole. The second factor in understanding Israel's public administration system is the constant desire to have a stable and strong government that can offer guaranteed protection and management in the continuing state of war the country faces with its neighbors.

From this perspective, one can understand why politics and political actors have a strong influence on the *modus vivendi* of government structures in Israel and how this inspires a strong sense of loyalty. Galnoor (2010: 100–119) argues that the relationship between politics and public administration cannot be overlooked since government structures can easily be influenced and reshaped by pressure from politics especially in countries where national security is given priority. To understand the different segments of Israel's society and public administration, we need to have a good grasp of the origins and evolution of the nation-state of Israel. The country's current and past experiences as well as practices, which have had significant influence in shaping

its public administration, make it relatively difficult but quite interesting to compare with other countries. Some of the dilemmas that make it difficult to compare with other countries are embedded in its historical, political, cultural, and social structures. Israel's relations with neighboring countries including Palestine as well as the idea of Zionism and Jewishness in relation to state and nation building also continue to give the country its distinctive administrative approach.

This chapter will examine the nature and characteristics of public administration in Israel. It begins by retracing the country's historical development in public administration then discusses the legal/constitutional framework with the goal of identifying the legal basis of the country's public administration system. The third section will discuss the structure and functions of the central government followed by an assessment of the local government. The chapter will also discuss the public personnel system/civil service, NGOs and civil societies, e-governance as well as recent reforms. The chapter will conclude with a summary of features that characterize the country's public administration system.

2 ADMINISTRATIVE HISTORY

The state of Israel and the dispute with the Palestinians over the legitimacy and ownership of land in the region remains one of the most publicized and controversial conflicts in the world. The question of who is the legitimate owner of the land remains a dividing matter with a scope beyond this chapter. Having said that, the administrative history of the territory saw some of the biggest and most powerful empires of their times interchange administrative roles for centuries. It is documented that the region was first conquered by the Romans in the first century who then named the area '*Palestine*.' Most of the inhabitants at the time were exiled but among those who remained were a small number of Jews. When the Roman empire collapsed, different dynasties and empires conquered and ruled the territory until 1516 when the Ottoman Empire took control of the region from the Egyptian Mamluks (*Ayyubid Sultanate*-1260). At the height of the Ottoman Empire, the region was prosperous and densely populated.

However, as the Ottoman empire began to decline, the region was negatively affected, and furthermore, the area is largely considered sacred for most of all the major religions and had few people settling in the territory. Meanwhile as at the turn of the nineteenth century, a new movement was emerging across the continent in Europe known as *Zionism*. Its advent can be attributed to the increasing violence and anti-Semitism against the Jews across the world at the time. The movement's primary goal was to establish a Jewish state and thus began efforts to encourage migration of Jews to Palestine. After World War I (1914–1918), the territory of Palestine, Lebanon, Iraq, and Syria was ceded from the Ottoman Empire.

Through the League of Nations and the *Treaty of Sèvres* (1920), Britain was granted control over Palestine. The British used this opportunity to actualize the *Balfour Declaration* that was signed in 1915. The content of this declaration was the desire of the British to assist the Jews in establishing their own state in Palestine. However, before the implementation of the Balfour Declaration, some Jews had already started settling in Palestine on the land they had purchased from the through the Jewish National Fund and from the Ottoman Empire. By 1945, the number of Jews living in Palestine had increased to approximately 600,000 with strong social, economic, and political organization (Ministry of Foreign Affairs, 2008). As the number of Jews continued to rise, conflict with the Arabs who were already living there became inevitable. By the early twentieth century, there was a consistent increase in Palestinian nationalism and Arab national consciousness. As the migration continued, the Jew's 'return' increasingly clashed with Palestinians' desire for independence. Between 1923 and 1948, as the British administered the territory, they came under constant rejection by the Palestinians for permitting increased Jewish presence in the territory on the one hand and other Zionist pressure for the establishment of a Jewish State.

The overwhelming pressure saw the passing of a 'White Paper' in 1939 that had two important objectives. The first one was to regulate or limit the number of Jewish migrants to Palestine at 75,000 during the first five years depending on the economic status of the country. Secondly, it stated that Palestine is an independent state and neither an Arab nor Jewish state. At the same time, the 'white paper' required strict measures to be adopted that would regulate the amount of land that the Jews were able to accumulate (Carley, 2018). In February 1947, Britain announced its intention to withdraw from the Palestinian territory and the UN General Assembly appointed the United Nations Special Committee on Palestine (UNSCOP) to work on a draft proposal for the future political status of the territory. When it completed its fact-finding mission, UNSCOP recommended the establishment of two independent states for the Arabs and Jews respectively and Jerusalem-Bethlehem to join these two countries in economic union but administered under an international authority. The report establishing two states was brought to the UN General Assembly for a vote on November 29, 1947, and was adopted after 30 members voted in favor, 13 members voted against the report, and 10 members abstained. Arab states rejected the plan and immediately formed a liberation army to grant Palestine independence. The decisions taken by the Jews and Arabs in the 1940s played an important role in understanding the ongoing conflict in the region today (Reich, 2008).

After an international consensus failed to yield the two-state solution, Zionist leader David Ben-Gurion on Friday, May 14, 1948, declared Israel an Independent state with Tel Aviv as the capital city. On this day, UN Resolution 181 officially terminated the British mandate in the region. The Israeli declaration of independence also marked the beginning of several military campaigns by its Arab neighbors. The first attack was launched by a coalition of Arab

states that included Egypt, Transjordan, Syria, Lebanon, and Iraq in 1948 and lasted for fifteen months before the Israeli Army repelled the attack. The second one was the Six-Day war that saw Egypt, Syria, Jordan, and Iraq mobilize over 250,000 troops for a full-scale invasion. The attack was pre-empted by the Israeli army who destroyed the Egyptian Airforce and annexed the Sinai Peninsula and Syria's Golan Heights.

Although since then there has not been a direct confrontation between Israel and the Arab states, the former continues to receive condemnation and criticism from the latter over its handling of the Palestinian population. Establishing a new state was not going to be an easy task for the Jews and specifically the political class. Adelman (2008) argues that the new state would have to deal with a number of issues that include: How government institutions such as the bureaucracy, judiciary, and executive were going to be established before the arrival of Jews to the new state. It was to also address how to unite the will and passion of Jews across the world to support the initiative as well as creating a national identity through reviving the Hebrew language that was almost becoming extinct among other challenges (Adelman, 2008).

3 LEGAL/CONSTITUTIONAL FRAMEWORK

Israel's constitutional framework is a combination of traditions and contradictions. The country does not have a written constitution and relies on basic laws which are progressive. Key among them are two basic laws on human rights adopted by the *Knesset* through a process referred to as the 'Constitutional Revolution' (Sapir, 2009: 355–378). The legal system was also inspired by General Assembly of the United Nations Resolution 194 that formally recognized Israel as a state and the era of constitutionalism that characterized the post Second World War period. Israel adopted the common law system, and its legal framework traces its roots back to the British colonial system. Roman-German and civil laws also influence legislative frameworks in Israel. This means that the country has a 'mixed jurisdiction' because both the common law institutions and the principle of 'good faith' that is extracted from civil law are recognized in the country's legal system (Bracha, 1982).

The judiciary plays an important role in filling whichever gap arises in any statute. International treaties are also an important source of Law in Israel. However, treaties are not automatically incorporated into the national law upon ratification but only until appropriate adjustments are made nationally. Therefore, only upon a determination that the law is internally compliant will the government embark on ratifying the treaty. Basic laws are adapted to provide a framework on how the state will be structured and function. These laws also outline the separation of power between the executive, legislature, and the judiciary. The Supreme Court came up with ten values and principles to ensure human rights were well protected in the absence of a formal Bill of Rights that would have been enshrined in the constitution. Principles of judicial criminal due process and fairness are sometimes enshrined in basic

laws in order to protect human rights. These basic laws are also important in balancing the interest of the society and rights of an individual in making any judgment (Maoz, 1987).

The absence of a written constitution is not by accident. The declaration of independence in 1948 was *inter alia* with a promise of a constitution to be written for the country. However, to date, this promise has not come to pass because different factions of society have failed to agree on the contents to be included in the constitution. According to Sapir et al., (2013: 10–18) in 1948, a three-stage process was adopted to facilitate the drafting of the constitution. A ‘Provisional Council of State’ was established at the first stage to function in place of a legislature as the process for an election of the ‘Constituent Assembly’ which would draft a constitution was to take the second stage. After drafting the constitution, the ‘Constituent Assembly’ was supposed to be dissolved to pave way for a legislative authority to be voted in using the electoral principles prescribed in the new constitution (Transition Law, 5709; 1949: 1).

However, the three stages were not realized because the provincial council of state was abolished, and its powers were transferred to the constituent assembly which in term acted as the legislative organ and the body tasked with drafting the constitution (Gavison, 1985: 115–117). The constituent assembly changed its name to the *Knesset*, but failed to gather the necessary consensus with constant disagreements that characterized the assembly between May 1949 and June 1950 (Segev, 2007: 147–50). Knesset Member Yizhar Harar pushed for legislation that saw the adoption of a compromise formula that supported the implementation of a piecemeal constitution by adopting Basic Laws.

In 1992, two new Basic laws were adopted by the *Knesset* and brought about significant changes to the constitutional framework of the country. These basic laws are a basic law that defended the Freedom of Occupation and basic law on Human Dignity and Liberty. The first Basic Law: Freedom of Occupation addresses issues that deal with freedom of trade and occupation only while the second one on Basic Law: Human Dignity and Liberty combines a number of rights and freedoms, such as property, mobility in and out of the country, dignity, equality, religion, and expression. The basic laws also give the Supreme Court the power of judicial review, meaning it is able to scrutinize legislation passed by the Knesset. In addition, as the country’s legal system continues to change, the Supreme Court has constantly made necessary adjustments to adapt into the constitutional law framework rights that are not necessarily mentioned in the Bill of Rights (Barak-Erez, 1995).

4 CENTRAL GOVERNMENT

The system of government in Israel is a parliamentary democracy based on the principle of elected representatives. This system is characteristic of many

western-based democracies and is applicable in both the presidential and parliamentary systems. It is characterized by a ceremonial president and three arms of government; the Knesset (Parliament), the Government (Executive), and the Judiciary.

4.1 *The Nasi (Presidency)*

The President also referred to as the *Nasi* in Hebrew is the head of state under the *Basic Law: The President of the State* passed on 25 June 1964 and amended 1969 and 1999 (the State President (Tenure) Law, 5712–1951). The title traces back to an ancient title given to the head of *Sanhedrin*—the legislative and judicial organs of Jewish society during the Second Temple, Talmudic, and Mishnaic Eras. It was first used by Hebron-resident sons of Heth who in reference to Abraham said ‘a Nasi of God you are among us.’ In the modern Israel state, the title of Nasi was bestowed to the founder of World Zionist Organisation Binyamin Ze’ev Herzl who also envisioned the president being elected by the Congress for a ceremonial role (Herzl & Leversohn, 1960).

The office and the individual holding the presidency are a symbol of national unity and are at all-time above party politics. The law stipulates that the President will be elected for a fixed one term of seven years by the Knesset (Parliament) and will be ineligible to run for a second term. Article 4 of the Basic Law states that any citizen of Israel residing in the country is eligible to run for the presidency. The election of the president and the tenure is reckoned by the Hebrew calendar (Basic Law, 1964).

The date for conducting a presidential election is also strictly stipulated. The law requires that the Knesset conducts elections not earlier than 90 days to the date of expiry of the existing tenure and not 30 days after the seven-year term has expired. If the office of the president becomes vacant for whatever reason be it death or resignation, then an election will be organized within 40 days from the exact date of the vacancy. In this case, the Speaker of the *Knesset* will consult the relevant offices and in writing will inform all members of the Parliament in advance of the election date. If the date chosen falls on the Knesset’s recess, the speaker will convene a special seating of the Knesset to facilitate the election of the president.

The presidency enjoys immunity granted by the Basic Laws on anything regarding its powers and duties. This immunity protects the president from being summoned to any court to answer questions regarding how they exercised powers and duties. The immunity covers one during and after his presidency. However, the president is only protected for criminal proceeding while in office and can be arraigned in court to answer charges amounting to criminal responsibility at the end of their term. This helps to elevate the status of the presidency above other branches of government.

The president performs several duties despite being ‘ceremonial.’ One of the unique roles of the president is the power of clemency, which gives the president full discretion to limit the jail term of an offender sentenced to life

(Criminal Register and Returnee Regulation Act, 5741–1981). Also, judges, rabbinical court judges, *kadhis*, and military judges who have been selected by a select-committee established by the law must swear allegiance to the president before assuming office. This is done within the framework of the Rabbinical Judges Law 5715, 1955, The Chief Rabbinate of Israel Law, 5740–1980, The Druze Religious Courts Law, 5723–1963, The Military Tribunals Law, 5715–1955, and The Kadi Law, 5721–1967.

The president also has the powers to appoint public servants in various central government institutions such as; members of the assembly of the Broadcasting Authority, members of the National Council for Civilian Research and Development, Governor of the Bank of Israel, members of the council of the Chief Rabbinate, the president of the ‘Israeli Red Magen David’ society, members of the Higher Education Council, National Academy of Science, members and trustees of the Wolf Fund board, and council members of the Prisoner Rehabilitation Authority among others. These appointments are in line with the following laws: The Israeli National Academy of Science Law, 5721–1961, The Bank of Israel Law, 5770–2010, The Prisoner Rehabilitation Authority Law, 5783–1983, The Israeli Broadcasting Authority Law, 5725–1965, The Red Magen David Law 5710–1950, The Higher Education Council, 5718–1958, The Wolf Fund Law, 5735–1975, The National Council for Civilian Research and Development, 5763–2002, and The Israeli Centre for the Advancement of Human Culture, 5719–1958. In addition, the President has the power to issue commendation letters for promoting ethics in the public sector to public servants whose complaints were successfully determined to be based on facts by the relevant authorities. This power is enshrined in the Encouragement of Ethical Behavior in the Public Service Law, 5752–1992. Last but not least, the president presides over the official opening of the Knesset in the new season.

4.2 *The Memshala (The Executive/Government)*

Basic Law: The Government (2001) creates and outlines the duties and responsibilities of the executive, also referred to as the government. This is the center of political power in Israel and the highest policy-making executive organ of the country. The head of the executive is the Prime Minister who is assisted by a council of ministers. The number of ministers depends on the results of the coalition making process that can see some ministers without portfolio also appointed in government. Since the country was established in 1948, no political party has been able to get the majority of seats in the Knesset to form a single-party government. Based on that, all governments have been a result of coalition agreements. The executive also consists of deputy ministers and a deputy prime minister. Arian et al., (2002: 23) observe that the majority of the coalition governments are formed based on the compatibility of political and public policy ideologies. The number of seats a political party gets in the executive largely depends on the party strength in the Knesset.

Until 1992, the president of the state was responsible for delegating the duty of forming a new government to the leader of the party with the largest number of representatives in the Knesset. During that period, because the country's political system was based on proportional representation, the new government needed to incorporate other political parties into a coalition in order to gain the support and confidence of the majority in the Knesset. In May 1992, the Basic Law 5752-1992 was amended to allow for the direct election of the Prime Minister by the people. This law was used to preside over the election in May 1996, May 1999, and February 1999. After being used in three elections, the Knesset in 2001 voted to revert the process of choosing a prime minister to the previous system where the president requested the party with the majority seats in the Knesset to form the government. In this system, voters in a national election vote for one political party on the ballot then the number of representatives in the Knesset is proportional to the number of votes the party got in the national elections.

Once the Prime Minister has been appointed, they nominate a list of ministers for the Knesset's approval. If the Knesset rejects the list or refuses to approve some of the names, this will be a sign that the Knesset has no confidence in the Prime Minister. Once the executive is approved through a confidence vote by the parliament, all members must publicly support the position of the government irrespective of whether they agree or raise concerns privately. The executive will be in office for the same duration of time as the Knesset that elected them. Under special circumstances or if stated otherwise by the basic laws then a variance should be observed. In order for one to be a candidate for prime minister one should be at least thirty-five years of age, be eligible to be a member of the Knesset, and should be at the top of the list submitted to the Knesset by their political party.

A candidate for prime minister needs to get fifty percent of the total valid votes cast in the first round of the election. Failure to do so will result in a repeat election normally on the first Tuesday of the second week after the results of the first round of the election were published. In this second round, only the two candidates who got the highest number of votes in the first round will be eligible, provided that they are also members of the Knesset. In case there is only one contestant for the position of prime minister, the election will still be conducted with the option to choose the candidate or reject him. If the candidate does not gather more than fifty percent of the votes, then a special election will be announced.

Forty days upon assuming office, the prime minister will in conformity with Section 33(a) and (b) of the Basic Laws: The Government is required to present before Knesset its list of ministers, its guiding principles that the new government intends to use to peruse its policies, and how duties will be divided. Once this process is fulfilled, the cabinet will gather in front of the Knesset and will be expected to declare their allegiance as stipulated in subsection Section 33 (c). There are some circumstances that can disqualify a person from being a member of the government. For example, an individual

who within the previous ten years had been convicted for an offense of moral turpitude cannot be appointed as a minister or if the prime minister stops carrying out his duties as a member of the Knesset then they will be considered resigned. The prime minister also can leave office by resignation, a vote of no confidence by the Knesset, or if the individual is unable to conduct the affairs of the office for more than 100 days. The prime minister is accountable to the Knesset while the ministers answer to the prime minister. The law requires the government to be lean, which is a minimum of eight members and a maximum of 28 members.

As a basic principle, cabinet meetings are held on Sunday morning unless there is an emergency that requires them to meet on another day. Most of the issues deliberated during the executive meetings remain confidential and are more so for when the executive committee on security affairs meets. Some of the issues discussed in the weekly meeting include the appointment of senior state officials, budget, proposed legislation, judicial matters, or issues of great public interest. Day-to-day activities of the executive are handled by specific standing committees that deal with issues such as international affairs, economic affairs, security issues, legislation, and home affairs. These standing committees meet weekly and if found to be fit set up ad hoc committees to address coalition matters. Decisions taken by these committees are final unless the cabinet plenary challenges it. A secretariat under the office of the prime minister and a standing committee coordinates activity among the different ministries. Minutes and agenda for cabinet meetings and those of different committees are prepared by the head of government secretary of the secretariat. The secretariat gives the public information regarding government decisions, keeps cabinet records, and serves as a liaison between the Knesset, executive, and the presidency.

Apart from the familiar ministries such as Ministry of Defense, Economy, Home Affairs, and others, there are some unique ministries such as Ministry of Religious Affairs, Ministry of Senior Citizens, Ministry of Jerusalem Affairs & Heritage, Environmental Protection, Ministry of Intelligence, and Minister in the Prime Minister's Office. The executives operate from the *Kiryat Ben Gurion* Government complex located in Jerusalem. Each ministry has a specific responsibility in Public Administration and is coordinated by the prime minister. The prime minister, with the approval and consultation of other government agencies, appoints high-ranking state officers such as the attorney general, governor of the central bank, and the head of Israel's intelligence agency—*Mossad*.

4.3 *The Knesset (Parliament)*

The Knesset is a unicameral parliament that carries out the legislative functions of the state of Israel and was established under the Basic Law. The name, as well as the number of representatives (fixed at 120), was adopted from the fifth-century representative council known as the *Knesset Hagedolah* (Great

Assembly that consisted of 120 prophets, scribes, and sages). The current Knesset began operating on February 14, 1949, after it transformed itself from being a Constituent Assembly that was supposed to draft a constitution for the new state of Israel. It is perhaps one of the most powerful arms of government in Israel and is located in the *Sheikh Badr* district of western Jerusalem.

The Knesset plays several important roles in government that include: electing the president (who has ceremonial functions), approving the cabinet and electing the prime minister (all of whom are members of the Knesset), passing laws, appointing the state controller, and providing oversight on the government. In addition, the parliament has the powers to impeach the president and the prime minister through a vote of no confidence, to waive the immunity of state officers, to dissolve the government, and to call for snap elections. In exercising its *de jure* parliamentary supremacy, the house can pass any laws through a simple majority. It can make amendments or pass a law that is contrary to the Basic Laws of the country unless the specific law stipulates a specific criterion for it to be amended or overlooked. The mandate to amend Basic Laws was given to the Knesset during the 1950 plan. The excess powers within the Knesset are what has necessitated the Supreme Court to also become a very powerful organ so as to check the activities of the parliament. For example, the Supreme Court has asserted its authority through its judicial review powers over a number of laws that the *Knesset* adopted but was inconsistent with the country's basic laws.

The Knesset is headed by a speaker who is assisted by a deputy speaker. The speaker and the deputy speaker are elected from the party with the highest number of seats by the plenum. Some of the speaker's functions include representing the Knesset in international and national ceremonies and conferences, overseeing the functions of the Knesset, and enforcing regulations and rules of the house. Either the speaker or a deputy speaker conducts debates in the plenum, calls for votes on resolutions, presides over the plenum's proceedings, as well as determines the results of votes cast. The Knesset presidium, whose functions include approving of bills to be tabled for debate, halting any proceedings on a bill, or determining the urgency of a motion, consists of the speaker and the deputy speakers. There is no threshold on the number of members present for the Knesset to carry out debate on an issue. This means that any decision can be made by the house irrespective of whether there were many or few members.

There are several committees and subcommittees constituted of members of the Knesset to deal with different issues of concern. These committees operate within the national laws or by-laws prescribed by the Knesset and are formed along the strength of a political party. The size of a committee varies from one to another and most of the Knesset members belong to at least two committees and leadership of important committees are given to members of the ruling coalition. These committees have the mandate of overseeing the daily operations of the Knesset and can be categorized as permanent committees, Parliamentary inquiry, Ethics Committee, Special Committees, public

committee, and interpretation committee. In addition, the Knesset can, if it finds fit, appoint a commission of inquiry to investigate a matter of national concern. These commissions consist of members from both the ruling party and the opposition.

4.4 *The Judiciary*

Just like in many other countries, the Judiciary in Israel acts as the watchdog over individual rights and the rule of law. However, the judiciary plays a much more important role in Israel because of the absence of a written constitution as well as the strong influence of the Knesset and reliance on a series of basic laws. The Judiciary is an independent entity under the Justice Ministry and is headed by a director of courts who is appointed and answers to the Minister of justice in accordance with Section 82 of the Courts Law (Consolidated Text) 5744–1984. In Israel, the courts are divided into two main components, one is the general law courts which are also referred to as regular or civil courts and on the other hand, there are some institutions and tribunals with powers to administer judicial powers. In the Judicial system of Israel, there are no juries. The distinction between these two types of courts is inter alia the perimeters of their jurisdiction. Table 1 helps to explain the distinction;

There are other judicial entities such as the *Tribunals with Limited Jurisdiction* with independent administration as well as their own mechanisms of appeal. There are *Labour Courts* which operate on two levels—namely the national and regional courts. Trials are conducted at the regional courts

Table 1 Types and functions of courts in Israel

The General Courts: There are three levels of general courts as established by the Basic Law: The Judiciary (Hatza'ot Chok No. 1348) namely; the magistrates, Supreme Court, and District Courts

The Magistrate's Courts: Magistrate's courts also act as family courts, municipal courts, traffic courts, and small claims courts. There are a total of 29 magistrate courts spread across the whole country and their jurisdiction is within the geographical district they are located

District Courts: These are middle-level courts and preside over cases that are not in the sole jurisdiction of any another court. The District courts also preside over appeals that have been forwarded from the Magistrate's court

The Supreme Court: This is the highest court of the land and has the jurisdiction to hear civil and criminal appeals that the District courts had made a ruling on. The Supreme Court also has jurisdictions on appeals filed in regard to Knesset elections, administrative detentions, Civil Service Commission rulings, Israel Bar Association rulings on disciplinary issues, as well as appeals from the District court concerning prisoners' petitions

High Court of Justice: The High Court of Justice is not a court by itself but rather it is the Supreme Court that acts as the High Court of Justice when it becomes the court of the first and last instance. This court has powers 'in matters in which it considers it necessary to grant relief in the interests of justice and which are not within the jurisdiction of any other court or tribunal'

while appeals are made at the national courts. In case the matter in question touches on labor relations and involves two employer organizations or two labor unions, then the trial will be heard at the national court. In addition, *Administrative Tribunals* are quasi-judicial entities designed to handle appeals relating to administrative issues and institutions dealing with social benefits, compensation from injury, or tax liability. *Religious Courts* have political and historical roots that can be traced back to the Ottoman era. The jurisdiction of this court in line with the personal status law can be found in the Palestine Order in Council of 1922 which states that 'jurisdiction in matters of personal status shall be exercised... by the courts of the religious communities'. Israel has recently included the *Ba'hai* and *Presbyterian Evangelical Church* within the Druze religious courts following legislation by the Knesset. *Military Courts* were established by the Military Justice Law of 1955 and have the powers to try both civilian and military offenses. Prisoners of war, as well as civilian employees working in the army, are also tried in military courts although with some limitation. Like many countries in the west, Israel has been facing increased demand for certain cases to be dealt with by courts focusing on administrative related disputes. While there is no permanent administrative court in the country's judicial structure, administrative issues are often handled by quasi-functional administrative tribunals. The oldest practice and most common use of these administrative tribunals have been to act as an appeal mechanism for public administration entities on matters ranging from tax liability and social benefits to injury compensation cases. The majority of the cases brought before these administrative tribunals include property tax liability appeals as well as compensation for injuries incurred during one's military service. Among the newly introduced quasi-judicial tribunals by the Knesset is the Standard Form Contracts Tribunal (SFCT) and the Restrictive Trade Practices Tribunal (RTPT). These two administrative tribunals deal with issues touching on contracts with unfair terms and conditions and rulings on unfair competition respectively.

5 LOCAL GOVERNMENTS

The local government is the second level of government in Israel tasked with the provision of services to residents and institutions within their jurisdiction. Local government authorities are responsible for ensuring services such as physical infrastructure, parks, the road system, the sewage system, water supply, as well as the waste collection and disposal system (Brender, 2003). In addition, environmental conservation such as public health, cleanliness, or nuisances, as well as education with collaboration with the ministry of education fall under the responsibility of local government. Apart from the building of education facilities, local authorities ensure that they are well equipped, and should the equipment require maintenance, they are responsible. Secondary schools and pre-kindergarten levels are established and managed by the local

authorities. Non-profit organizations with the help of local authorities also manage and own some schools (Razin, 2004).

Financial assistance to promote sport and cultural activities, such as museums, libraries, and sports are offered by the local authorities in addition to some choirs, orchestra theaters, and similar entities (Carmeli, 2002). Provision of social welfare services falls under local government authorities. Needy people, special groups such as disabled children, drug addicts, or the elderly receive support from social workers who are employed by the local authorities. Another important role played by local authorities is the implementation of The Planning and Building Law, 5725–1965 which relates to town planning. This law delegates duties which relevant planning institutions at the district, local, and national levels should play a role in ensuring that the proper urban planning principles in towns are adhered to. It allows local planning commissions, which consist of members of local authorities, the right to exercise independence while expanding national and regional dimensions of planning. The responsibility to ensure on-site regulation compliance as well as overseeing day-to-day management of planning agenda falls under the local planning commissions.

At the district level, planning is done through a state-local authority and its members consist of officials from the central and local government whose mandate touches on planning issues. The district commission is responsible for approving local plans once they have been drafted as well as presiding over appeals that may arise from the actions of the local government. The issuing of by-laws is the responsibility of local councils within their jurisdiction. Local councils have the power to enforce by-laws as well as regulations and functions that are relevant to their actions. Local authorities are empowered to collect revenue through taxes and levies they impose on concessions and services. This enables them to have the means and powers to manage their own revenues. Each local authority prepares a budget and implements it once it has been approved by the Ministry of Interior. In addition, the local council is required to employ the services of an auditor.

5.1 *Legal Status of Local Government*

The local government system in Israel can be traced back to the Municipal Corporations Ordinance of 1934 when the region was still under the British mandate. This law has become an important reference point from which the legal status of local governments in Israel is derived. Today, the country has enacted the Municipal Corporations Ordinance (new version) 5724–1964, which together with other legal documents such as the 1941 Directive on Local Councils provides a framework of local government operations. The law gives local authorities six areas of jurisdiction: legislation, financial management, taxation, joint activities with other institutions, as well as various general powers.

5.2 *Structure of Local Government*

The local government structure is framed from the historical *Nahiye* (rural districts) and *Vilayet* (Provincial administration) that were used during the Ottoman Empire reign in the region. The Ottoman government also passed the Provincial Municipalities Law of 1877 that regulated the establishment of cities. This form of government was inherited by the new state and was characterized by a highly centralized and hierarchical model of administrations where sub-local authorities were highly controlled from the provincial level. In 1935 during the British mandate, the Municipal Corporation Ordinance was adopted to regulate local government administration. This ordinance had a very little impact on the structure of the local government and by 1947 when the British mandate ended very little had changed in the region's local government structure. When the Jewish state was established, the government in Tel Aviv was rather suspicious of the excess powers of the local authorities and passed the Municipality Joint Authority Act in 1955. This new law was meant to achieve two important goals, one was to encourage the creation of local authorities and the second was to give the central government adequate control over these local autonomies.

Today, there are three levels of local government: the regional councils, local councils, and municipalities. There are 51 municipalities in total and they are responsible for administering urban areas with a population of 20,000 people and above. There are three large cities in Israel namely: Haifa (population 272,000), Tel Aviv (population 359,000), and Jerusalem (population 670,000). There are nine municipalities considered medium-sized with a population between 110,000 and 160,000 residents. However, the majority of the municipalities have smaller populations between 20,000 and 80,000 residents (Central Bureau of Statistics, 2017).

Local councils govern large rural areas and small urban centers. They have almost similar powers with that of municipal councils and most of them have a population of over 5,000 residents. Regional councils, on the other hand, are two-tier in nature with the lower tier mostly agricultural-based and allowed to elect a local committee mandated to provide essential services at the municipal level. While the upper tier is established as a regional council and consists of candidates selected from each region within the jurisdiction of the council. There are municipal federations that operate alongside the local authorities based on the advantages of economies of scale and provide services, such as firefighting. The Federation of municipalities have their own budget and have the power to collect levies, sign contracts, and even pass laws. In addition, local government authorities offer services, such as social services, water supply, garbage disposal, sewage systems, maintenance and installment of public parks and gardens, road maintenance and paving, as well as developing and maintaining of institutions for education, sports, culture, and health. Noteworthy, the central government provides health, education, religious, and welfare services.

Some of the Local Government Associations in Israel include;

Amana—Settlement movement of Gush Emunim
 Association of Managers of Education Departments in Municipalities
 Association of Municipal Corporations
 Association of Regional Councils in Israel
 Ayalim Association for settlement in the Negev and Galilee
 Center for Sustainability
 Federation of Local Authorities in Israel
 Friends of Gush Katif
 Golan Heights Association
 Israel Association of Municipal Engineers
 Israel Association of Treasurers in Local Government Offices
 Kibbutz Movement
 Moetzet Yesha, Council of Communities in Judea, Samaria, and Gaza
 Moshav Movement
 Municipal Auditors Association in Israel
 Or Movement for Negev and Galilee
 Religious Kibbutz Movement

While the central government provides for much (75%) of the financial needs for local governments, there are local revenue collections that are done by the local governments. This includes: revenue from property taxes, by-laws-generated income, payments made for the utilizing of local cultural, educational, and recreational services, several tolls, and incomes mostly interests from assets owned by the authority. These services provide the majority of funding generated by local governments. Whenever a local government entity fails to meet its financial obligation, the Ministry of Interior can extend a grant. Expenses incurred by local government are geared toward provision of local and national government services, development projects, and repayment of loans. Local governments in Israel do not have financial autonomy since the central government through the ministry of interior and finance supervise budgeting and audit processes. For example, the Interior ministry approves any guarantees, loans, land sales, as well as agreements local governments seek to commit to.

5.3 *Election and Dissolution of Local Government*

Local Authorities in Israel are headed by the local council. Members of the local council are selected for a term not exceeding five years through a process that reflects proportional representation of political parties. Mayors (Municipalities), as well as the chairpersons of regional and local councils, are directly elected by the people after the Law no. 5735 of 1975 was passed. In most cases, the mayor forms a coalition government because no single political party

is able to get a working majority. Through this, arrangement, functions, and power distribution among different political parties are defined. The size of the population within the local council will determine the number of seats in the local council. However irrespective of the size, the size of the local council is between 9 and 31 in the municipal councils and in the local councils 5 and 21. Interesting to note, turnout for local council elections is high when it coincides with the Knesset elections but lower when local elections are conducted separately. In either case, turnout in areas with majority Arab population is always higher than areas dominated with Jews during local council elections. Local council elections are governed by the local council elections financing law that guarantees each political party will receive financial support depending on the proportion of votes they have secured. In the event a local council can no longer function due to financial constraints, the Minister of Interior has the power to fire the mayor or the chairperson, dissolve the council, and appoint a special committee that will be in charge of the council until things revert back to normal (Beeri, 2009: 7–11).

6 CENTRAL-LOCAL GOVERNMENT RELATIONS

The central government maintains a strong grip on local government authorities through a rigid system of supervision and financial levies. The central government continues to influence local governments during development stages, defining the duties and responsibilities of local government, through financial and economic aspects, as well as by determining administrative competences at the periphery and central levels. The Sandbar Commission (1976–1985) named after its president defined the limits of the state commission on local government. There is constant interaction between officials of the local government and those from the national government. One of the areas with strong relations is the welfare and education sector which takes up more than fifty percent of the local council budget and a higher ratio of employees than any other sector. While local councils are responsible for providing learning facilities, such as building schools and equipment, the Ministry of Education is responsible for the professional qualification of teachers and the curriculum. The Ministry of Education employs teachers and staff of the intermediate and elementary schools while the local council employs school secretaries, maintenance personnel, secondary school, and kindergarten teachers.

Responsibility for welfare services is also shared between the local government and the Ministry of Labour and Social Welfare. The latter sets policies regarding issues touching on the welfare of the people while the former is the agency tasked with the implementation of these policies. The local welfare bureau manages services and professional staff, such as the social workers within their jurisdiction. Local governments sometimes go beyond the set-out perimeters by the Ministry in offering welfare services. The Ministry of interior plays an important supervisory role of the local government in areas such as

approval of their budgets, examination of local council by-laws, the establishment of local authorities, provision of a suitable legal framework, ensuring that the planning and development projects proposed by the local council conform to the regional and national agenda. Local councils that have a low-income base receive grants from the Ministry of Interior based on special criteria. Such grants are meant to assist the local council to meet their minimum service standard. Importantly, the Ministry of Interior negotiates with other government agencies, such as the Ministry of Finance, on behalf of the local authorities.

The ordinary budget of the local councils is financed using resources from government participation, locally generated income, and loans meant to balance the budget. Recent years have seen the proportion of locally generated income significantly increased from the figures witnessed between the 1970s and mid-1980s—a period when the national government was contributing much more. Today the contribution is much balanced. The national government provides two types of financial packages to the local government through grants and loans. Grants are not conditional on the expenditure of the local council since they aim at supplementing low-income regions (Hasson & Hazan, 1997).

The central government contributes approximately 60–66% of local government budgets. The Ministry of Labour and Social welfare and the Ministry of Education are the biggest sources of income toward the local council budget covering around 75% of their relevant areas (Braver et al., 2000). Other government ministries also contribute resources to finance projects at the local government level. In 1981, the Central Bank of Israel appointed the State Commission on Local Government to conduct research and give a report on the future means of financing local governments as well as how local governments could become more independent from the Central Bank. The report recommended additional responsibilities to be given to the local authorities. The general observation has been that local authorities have performed well in dispensing their duties and completing projects on time. This has given local authorities a wider sphere of influence even in areas where the national government is the one pulling the strings.

7 PUBLIC PERSONAL SYSTEM

In Israel, employment both in the public and private section is dominated by agriculture, industry, and service sectors (See Fig. 1). The Civil Service laws (Civil Service Law no. 5723–1963, Civil Service Law (Classification of Political Activity and Collection of Funds), Civil Service Law (Appointments) number 5719–1959) are responsible for the management of the entire public sector and cover government ministries, independent regularly agencies, the entire public sector, and instrumental bodies. The law establishes a central body whose functions include enforcing legislation, nominations and delegation of duties, appropriating responsibilities for retired personnel, retirement, and hiring. Public service employees work in departments such as public education,

public health, and security and defense affiliated institutions like the police and the military.

The Civil Service Commission established under the office of the prime minister is the supervision and organizational body that oversees the implementation of ‘Civil Service Regulations,’ (*Takshir*) which govern public administration and employment. The office of the Prime minister, with the support of the finance ministry, plays a huge role in the management of civil service. Ministries and general departments only have control over the percentage they will allocate on expenses, salaries, and general expenditure. A strong system of performance management is in place under the framework of general accountability to ensure efficiency in service delivery. While merit is strictly observed and regulated by the Civil Service Appointments Law, (1959) in most cases isolated incidents of deliberate corruption are also visible. Political connections are important for one to rise up fast in the employment ladder. However, there are occasional promotions that middle and low-rank officers can get within their departments. High ranking position holders in the government are ranked and evaluated differently.

In terms of policy implementation in public service and human resource management, the Civil Service Commission is tasked with this delicate duty. The commission’s tasks and responsibilities are outlined in a series of legislative acts known as *Takshir* and within this is the quality and excellence unit that ensures constant improvement in the quality of civil servants. The civilian labor force is approximately 700,000 people which translates to about 17% of the total labor force. The age of 15 is the official minimum working age in the country. The minimum wage stands at USD \$1,300 in 2018. In 2017, the government spent over \$50.6 billion (almost half of the total budget that year) to pay public service salaries, according to the Ministry of Finance. The percentage of men employed is 85% and 75% of women according to the OECD report of 2016.

Unemployment rates are low—about 4% in the last decade. However, non-Jews and foreigners consist of a larger fraction of the unemployed. Reforms that began in early 2000 have seen an increase in the employment rate for both men and women. Wages have been increased. The net real household income across the country has increased. And the employment gap between the minority (mostly Arabs, non-Orthodox, and Ultra-Orthodox) and the Jews has also narrowed. That said, there are several challenges that still exist. For example, the rate of male employment is below the OECD average. There are huge earning inequalities between different groups and non-Jews still form a majority of the unemployed (Shapira et al., 2011).

Labor relations are protected by the law and a number of labor unions in Israel. These entities have achieved a lot for the workers in Israel over the years. For example, the adoption of the Wage Protection Law, 5718–1958 and the Employment of Woman Law, 5714–1954 both regulated fair wages as well as protecting pregnant women from being dismissed from work. The Knesset has over the years adopted new laws aimed at preventing individuals

from being discriminated against at work and expanded workers' rights. Other regulations have also been adopted to protect the interest of workers. In addition to legal mechanisms, Israel has some of the oldest labor unions. The *Histadrut* (Jewish Worker's Federation) was formed by early settlers in 1902 before state of Israel was established. Not surprisingly it became a significant actor before and after the State of Israel was established. In the early years, the Jewish Worker's Federation accommodated over 85% of workers (both Arabs and Jews) in Israel. However, after 1995 its membership declined to 60% partly because the requirement for trade union membership for one to benefit from health insurance was removed. With a growing private sector, the membership to *Histadrut* declined further to 10% in 2017. However, it is attempting to rebrand itself and is referred to as 'The New Histadrut' today. Equally important, labor union membership has been split among emerging profession-specific unions, such as the High School Teachers' and The Grade School Teachers' Union, the Leumit National General Union, and the Doctors' Union. Despite the existence of several unions, there is no statute that specifically regulates unions. However, they do fall under the regulations of NGOs.

8 NGOs/CIVIL SOCIETY

The non-profit sector in Israel is showing signs of adjusting to the rapidly changing socio-economic environment in which other non-profit organizations are operating in across the world. These changes include reduced government expenditure on social welfare as well as legal requirements, such as accountability and transparency. Today, most non-profit organizations consider not only their own institutional interests, but also other external factors, such as demand for services caused by lower public spending. Issues such as how the organizations will be organized as well as *mundus operandi* which affect the organizations' ability to adapt to new situations (Orr & Golan, 2014).

There is a total of 36,000 actively registered non-profit organizations in Israel with over 500,000 people employed in the sector. They are distributed among different sectors as follows: Religion (25%), Research and Education (20%), Recreation and Culture (17%), Welfare (15%) Environmental Protection (1%), and International Aid and Human Rights (1%). Financially, non-profit organizations contributed over \$ 67 billion to the GDP (5.3% of GNP) in 2017 with revenues topping \$ 137.4 billion. Much of this revenue is raised locally and approximately 1500 organizations from abroad (the majority of which are based in the United States) support non-profit organizations in Israel.

The state of the non-profit sector in Israel is encouraging since it is ranked among the largest in the world in terms of the number of employees and its contribution to the country's GDP (Gewirtz-Meydan et al., 2016). Between 1948 and 2004, Jewish NGOs in the United States have sent over \$11 billion

in donations in addition to \$329.5 million generated through the Israel Emergency Campaign. This sector has had a very important influence on the country's society and economy since the nineteenth century when the early settlers began to migrate to the region. Historical Jewish tradition characterizes the conduct of most organizations in the sector today through their spirit of mutual assistance and charity. As the sector accelerates and grows, it brings forth concepts such as civil action and volunteering into the legal sphere, which then requires that transparency, public scrutiny, and accountability are upheld (Onder,). Another reason for the rapid growth of the sector in Israel is the process of privatization that begun in the 1980s that led to increased competition from non-state actors.

Characteristics of nonprofits in Israel include: the organization is legally registered, non-profit distributing, voluntary, self-governing, and private. These features define the internal and external features of organizations that can be considered a non-profit. There are several laws that govern these definitions and an organization can be registered under either of them. They include: the Trusts Law, 5739 of 1979, Ottoman Societies Law no. 121, the Parties Law, 5752 of 1992, and the Council for Higher Education Law, 5718–1958.

9 RECENT DEVELOPMENTS/REFORMS IN PUBLIC ADMINISTRATION

Vigoda Gadot & Meiri (2008) opine that much of the reforms within government agencies in Israel over the last four decades have been influenced by New Public Management (NPM) and post-NPM reforms. NPM ideology has shaped reforms in the bureaucracy, entities financed by the exchequer, and government agencies. This has seen the public sector become more citizen-oriented as evaluation outcomes and processes were characterized by well-defined indicators and privatization. The reform strategy in some sectors such as the public service has seen the adoption of a negotiated, open-book, and participatory approach that targets a snowball effect through incremental reforms. On the other hand, some reforms have featured a top-down, secretive, and centralized approach, such as was the case with the public information reforms by the finance ministry. One major reform has been the adoption of e-governance in public management. This approach begun in 1997 but took off in 2012 with the goal of providing improved services to the public by using technology. Other reforms include the Municipality bill and the Planning and Construction Bill, which have helped bridge the financial gap between more advanced cities such as Tel Aviv that constantly demand more independence in their decision making and peripheral local authorities that are weak and in need of constant supervision and assistance. These new reforms enable bigger municipalities to make more independent decisions and limit the powers of weaker local authorities.

10 CONCLUSION

A unique history and set of events surround the establishment of the State of Israel. The country has a public administration system with features worth emulating elsewhere. The study shows that the country's administrative structure has been shaped by historical, religious, political, and geographical experiences of the society. Israel has also been open to international trends in public administration reform, such as the adoption of 'New Public Management and Governance reforms' (Nyadera & Islam, 2020). These have led to improved service delivery, participation, and professionalism in the country's public administration. It is one of the few countries without a written constitution, but strong, independent institutions ensure accountability and the protection of citizen's rights. With a prime minister and a ceremonial president, the central government exercises a parliamentary system. However, this is often undermined by weak coalitions. The local government remains weak despite having undertaken several reforms. Local government continues to heavily rely on the central government for financial support. We have also assessed the public service, which is merit based and professional although political influence and identity have an impact in promotion sometimes. Civil society movements are robust and have a strong historical and social role. The non-profit sector contributes significantly to employment and GDP. The country continues to adopt reforms, including e-governance, as it strives to respond to increased demand from its citizens for a more responsive government (Table 2).

Table 2 Main Features of Israel Public Administration

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Administrative History	Geopolitical situation	Strategic
	Colonial history	No (but state was formed in 1948)
	Legacy of bureaucracy	Yes (technocracy)
	Centralized bureaucracy	Strong
	Role of military	Military influence
	Political culture	Liberal and conservative wings
	Administrative culture	Participative
	Professionalism	High
	Politicization of bureaucracy	Moderate
	Dominant state ideology	Secular and religious combined (zionism)
Legal Structure	Nature of constitution	Unwritten
	Origin of constitution	None
	Strong constitution	No
	Constitutional rigidity	No
	Created by	civil and military initiatives
	Revised by bureaucracy	civil initiative
	Administrative judiciary System	Administrative tribunal (Weak Administrative System)
Central Government	State structure	Unitary
	Government structure	Parliamentary
	Hierarchical structure	Strong
	Local extension agencies	Limited to main areas
	Central government	Yes & strong
	Coordinating mechanisms	Existence of coordinating internal and external structure/agencies
	Transparent financing system	Strong
	Monitoring	Strong
	Independent regulatory Agencies	Exist
Local Governments	Financial autonomy	Moderate
	Political autonomy	Weak
	Council types	Council mayor
	Mayors	Elected

(continued)

Table 2 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Intergovernmental Relations	Decision making bodies	Local council
	Central tutelage/monitoring	Exists strong monitoring
	Subsidiarity principle	Exist
	Decentralization type	Decentralization
	Logic for Division of tasks	Fair and rational
	Tutelage/monitoring	Moderate
Public Personnel System	Communication	Moderate
	Civil services	Career based/Prestigious
	Scope of civil services	
CSOs/Civil Society	Recruitment and promotion	Competitive
	Nationwide exam	does not exist
	Politicization in general	Moderate
	Unionization	Moderate
	Size of Civil Society	8% GDP, employment
	Institutionalization	Strong
	Partnership with the state	Moderate
	Political pressure/ domination	Moderate
	Major financial revenues	Membership fees, grants, donations, and fundraising activities
	Supportive national culture	Strong
Reform Philosophy	Political regime & civil society relations	Moderate
	Civil society	Prestigious
	Dominant reform paradigm	NPM reforms & Governance reforms
	Policy Transfer	Policy adaptation
	E-government reforms	Completed
	Artificial intelligence (AI) reforms	Exist
	Influence of international actors	OECD, UN
	New reforms (5 years)	Public service, local government, and Central government reforms

Source Adapted and developed from Önder, M. & Zengin Ü. N. (2022). A Framework for Comparative Analysis: Public Administration Across the Globe. In The Palgrave Handbook of Comparative Public Administration: Concepts and Cases (Editors: Onder M., Nyadera I.N. & Islam, M.N.), Springer Nature Palgrave Macmillan: New York

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The Kingdom of Saudi Arabia

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I INTRODUCTION

Saudi Arabia is fundamentally a traditional nation. The Ottoman Empire controlled large swaths of the Arabian Peninsula for nearly 400 years, starting in 1516 with the capture of the Hijaz region in western Arabia and ending in 1918 with the end of World War I (Ochsenwald, 2016). The connection between the Ottoman Empire and Arabia, notably, in the main area of the Hijaz, which included the two Muslims' sacred cities "Mecca and Medina", is critical to understanding the importance of the Saudi Arabian public administration (Ochsenwald, 2016).

Three main themes dominate the importance of studying the public administration of Saudi Arabia. The first is the importance of coastal regions; the second is the Ottoman state's strength and control of the Arabian Peninsula; and the third theme is the significance of religion in compelling engagement

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with Arabia (Ochsenwald, 2016). The Arabian Peninsula is around a million msq (2.6 million square kilometers) in size, but much of its interior was desert, with little agricultural activity, sparse oases, a sparse population dominated by nomadic or semi-nomadic Bedouins, and little natural resources. Before the “exploration of oil and natural gas, central Arabia and most of eastern Arabia were poor; so poor that both the Ottomans nor past empires were interested in ruling them”. The west of the coast around 1,200 miles (1,900 km) and, in particular, the Hijaz district, were of great religious significance because they were home to Islam’s two holiest places, “Mecca and Medina”. The Ottoman sultans wanted to keep hold of Arabia’s western coast to prove that they were the “guardians of Islam and the stewards of the two holy cities”. Support for “hajj, or pilgrimage to Mecca and Medina”, provided religious and political legitimacy (Salibi, 1980).

The Ottomans had new duties in the nineteenth century, including protecting steamships from the Red Sea’s various reefs, promoting pilgrimage by constructing a railway to relieve the hardships of traveling by Camel, and providing better protection against international depredations and forces that could intrude on the holy land of the Hijaz (Ochsenwald, 1984). The control and influence of the Ottoman rule can be felt in the country’s administration even today.

The present administrative and governmental structures were superimposed over the strong religious fundamentalism and the old tribalistic patterns. Furthermore, the country was long isolated from the outside world by seclusion, traditional conservatism, and geographical factors. The Kingdom of Saudi Arabia attempted to harmonize Islam’s teachings with economic growth and industrialization, and it has ‘extensive’ coastlines on the Persian Gulf and the Red Sea that have considerable influence on crude oil shipments via the Persian Gulf and the Suez Canal. This was derived from a mixture of government and a legal framework to meet modern society’s needs but remained aligned with Islamic law principles (Moshashai et al., 2020).

2 ADMINISTRATIVE HISTORY

The Ottoman Hijaz entered a new period in 1840, when Ottoman power was restored following the removal of Egyptian forces, and in 1908, when Sharif Husayn ibn Ali was named amir of Mecca by the Ottoman central government, it marked a significant watershed moment in its history, culminating in the Arab Revolution against Ottoman administration in 1916. Ottoman law in the Hijaz waxed and dwindled between 1840 and 1908, but three elements remained constant: Instead of the interior, Ottoman attention in the Hijaz was focused on the coast and the two “Holy Cities of Mecca and Medina”; Ottoman presence in the Hijaz was restricted by the distance between “Istanbul and Mecca”, as well as the resulting in transportation’s slowness and Ottoman strategy was mostly motivated by religion.

Another factor was the rivalry between the Ottoman valis, or governors of the Hijaz, and the sharifs, who acted as amirs of Mecca. While the Ottoman sultan selected both the “sharif and the vali”, the sharifs had their own authority as descendants of the Prophet Muhammad. (Today, the rulers of Jordan and Morocco enjoy the same legitimacy.) Valis could rely on local Ottoman fortresses and take advantage of the bulk of customs duties collected at Jidda’s port, but sharifs had greater control over nomadic tribes, merchants, and religious leaders than the valis. The Ottomans maintained the political order in the Hijaz between 1840 and 1854, which had existed prior to the Wahhabi and then Egyptian occupations. As a result of increase in finances, pilgrimages to Mecca were on the increase, and traders and guides prospered.

Between 1883 and 1908, the Ottoman Hijaz witnessed a major rise in political instability. The pilgrimage was plagued by epidemic diseases, and Sultan Abdülhamid II wanted more direct influence over the area. Vali Osman Pasha grew in influence at the detriment of the sharifs; for example, in 1884, he assumed the leadership of the “Meccan Haram”, effectively taking charge of the Kaba’s management on a day-to-day basis. Nonetheless, in 1886, the Amir Awn al-Rafiq used political maneuvering in Istanbul to protect Vali Osman Pasha’s expulsion. Awn al-Rafiq raised substantial amounts of money from tourists and traders in the late 1880s and early 1890s, but the outbreak of cholera forced him to assist controversial fumigation practices. Until his death in 1905, Awn al-Rafiq devised a method of collaborating with valis. In the 1890s, the national government built a Hijaz telecommunications line and then proposed plans to build a railway connecting “Ottoman Syria and Palestine to the Hijaz”, this agreement was disrupted.

In the early 1900s, the Sharif convinced herders north of Medina to condemn the construction of the Hijaz Rail line from Damascus through Medina. After facing local opposition, the Hijaz Railway arrived in Medina in 1908. The Ottoman sultan dubbed this railroad line holy because its main function was to promote pilgrimage, however in addition to that noble goal, the Hijaz Railway could also be used to transport troops and pilgrims south toward the Hijaz. The new Amir Husayn, as well as the Ottoman government’s various problems between 1908 and 1914, put a halt to a proposed expansion of the line from Medina to Mecca (Ochsenwald, 1984).

Based on two strong foundations, Saudi Arabia became a modern state: the Wahhabi religious reform movement of the eighteenth century and a visionary king who turned the campaign into a concerted effort to unite the Arabian Peninsula (Farazmand, 2019). Saudi’s control over the peninsula was restored by King Abd-al-Aziz Ibn Saud from his exile in Kuwait by occupying and recapturing Riyadh, the capital of the land of his forefather, Najd. Between 1903 and 1906, the bulk of Najd yielded to him. He added the al-Hasa zone between 1907 and 1913 (Sayigh, 1971). He went on to include the al-Hasa zone between 1907 and 1913. In 1921, he took control of Hayil, the capital of Najd’s northern region, and the city of Asir was annexed into the territory of Abd-al-Aziz that same year. He captured Hijaz in 1925, and then most of

the peninsula was under King Abd-al-Aziz's rule. Abd-al-Aziz was crowned King of Hijaz and Najd and their dependencies in 1927.

The government was renamed the Kingdom of Saudi Arabia on September 22, 1932. In the initial periods of the establishment of Saudi Arabia, it encountered two major issues. First, to begin with, the nation had little familiarity with public structures or contemporary governance. The second issue was a significant lack of manpower, since the bulk of the population were nomads or herders, and therefore excluded from the labor force. The Saudi government used a variety of methods to try to solve the issues. First, the government attempted to adapt some political and administrative models from other Arab countries, particularly Egypt. Second, international workers were brought in by the government to help fill the growing administrative and industrial bureaucracies. The country was impoverished, subsisting mainly on revenue derived from pilgrimages to its holy cities (Bowen, 2014).

When commercial quantities of oil were discovered in 1930. Following this, the government was able to pursue the modernization of the country. Thus, the oil exploration altered Saudi's entire economic and social situation which was critical in transferring the rural, ethnocentric culture to a more multicultural and modern one. A contemporary society, on the other hand, necessitates a modern administration. In this regard, King Abd-al-Aziz established the foundations of the country's current government. A couple of weeks before his demise, the King authorized the formation of a Council of Ministers, under his eldest's presidency, Crown Prince Saud's son. After the demise of Abd-al-Aziz on November 9, 1953, Saud was crowned King, with Faisal as Crown Prince. Faisal presided over the Council of Ministers as its President for much of King Saud's reign and aided his brother in expanding the state's administrative system. To introduce the economic and social growth of the country, new ministries and autonomous agencies were established. Conventional traders loyal to al-Saud, endorsed local tribal disputes and resulted in Saudi Arabia's modern monarchy. According to Gray (2014), between 1902 and the conquest of Riyadh in 1927, there were tribal conflicts. Saudi Arabia practices a rigid form of Islam propagated by Shaihh Ibn Abdel Wahhab in the eighteenth century (Attar, 1979). The al-Saud family, which provided military-political leadership, and the Wahhab family, which provided religious leadership, formed an alliance that gradually consolidated the modern Saudi state.

In Saudi Arabia, the public sector not only serves to depoliticize people through high-paying government positions, as it does in Kuwait, but it also serves to reinforce historical relations between ruling family class and their followers through its institutions. The huge flows of oil income in the 1970s not only created a colossal "flabby" bureaucracy, but also used its organizations to consolidate "patrimonial and patronage" relations among the royal dynasty, the Wahhabi elite, and prominent tribal authorities (Pierce, 2012; Gray, 2014; Ali, 2009). House (2013) indicated that Saudi Arabia's administration has devolved into a "family business" in the absence of a strong political

institution to challenge al-Saud's actions and support the needs of the middle class, as Dunford (2013), observed "a family-run administration" in which key tribal elders and royal descendants hold key state and ministerial posts. As a result, Saudi Arabia's administrative system is extremely personalized, with "informal systems of power determining the exact value of agencies", rather than the function they represent in society.

Princes and persons with differing level of informal power, control, and desires traditionally lead government agencies. This results in a bureaucratic environment that is "fragmented", with laws being implemented based on their ability to support the greater good rather than the particularistic desires of specific individuals. As a result, personal preferences and interests dominate policy making, and public-beneficial policies are often thwarted by "individual departments [that] often dilute [their] execution, and cast smaller vetoes on rules and regulations or other relevant procedures" (Ochsenwald, 2016). Because of the climate of nepotism and informality, a whole industry of middlemen with close links to the Saudi bureaucracy has emerged (al-Hegelan & Palmer, 1985).

The country is a force in the Middle East that has played a prominent part in the Middle East's foreign affairs and beyond. It is among the region's biggest economies and a member of the 20 group that constitutes the world's 20 largest economies (Almomani, 2019). Moreover, within a harsh regional setting marked by competition between major regional forces such as Turkey, Israel, Iran, Egypt, and Iraq, where Saudi Arabia is based. Again, Saudi's political culture which includes the al-Saud monarchic hegemony as earlier mentioned, segregated status of females, extended family values, and devotion to Wahhabi and tribal understanding of Islam characterizes its political culture and acts as a screen to ensure that human and technological advancement remains within acceptable bounds.

The Saudi public sector is the country's largest employer, and the domination of al-Saud royal family in major government roles results in a "fragmented" and inefficient bureaucracy that encourages different types of corruption (House, 2013). In 2014, Saudis accounted for more than 90 percent of overall government jobs. Saudi public sector workers are not encouraged to do well because these positions are typically occupied based on kinship and relationships rather than merit, resulting in an overstaffed, inefficient, and costly bureaucracy. According to Ramady, (2010) in 2008, for instance, Saudi Arabia's wage bill increased to 27% of overall government revenue, while just 25% went to capital/investment expenditure.

Foreign firms are required to use these middlemen to help them navigate the regulatory maze and get documents forward more quickly in exchange for a premium. They might also be tasked with securing state contracts for their clients by pairing them with Saudi partners who are eligible to negotiate on government contracts (Field, 1985; Hertog, 2010). The Economist (2014) emphasizes this argument, stating that "cooperation between state bodies is often weak, and it is always important to negotiate official administration with

the right connections”. According to *The Economist* (2014), when entering the Saudi bureaucracy, “you are at the whim of an employee on duty on that day because laws are never followed exactly the same as they are stated”. Furthermore, several of these middlemen (known in Arabic as *Mua’qqib*) have informal *Majlis* meetings with princes and use this access to secure transactions for common people who have no ties to merchants or royal representatives.

Currently, a modern nationalism that is changing domestic politics and the foreign policy of the country is embracing Saudi Arabia. The state deliberately nurtures this nationalism, the power of the long-dominant religious establishment has been drastically diminished although it still runs absolute totalitarian monarchy. The latest nationalism’s main aim is to speed up the rise of Mohammed bin Salman, the crown prince, and back up his reform agenda. But a Trojan horse may have been created by the leadership: nationalists now seem to be training their aggressiveness back on the system that produced them, i.e., it is going back to its long-dominant religious establishment.

3 LEGAL STRUCTURE OF SAUDI ARABIA

According to Esmacili (2009), Saudi Arabia is exceptional in the Middle East because its basic philosophy is built on the philosophy of “Wahhabism”. As an ideology, Wahhabism rejects any theological invention and takes no cognizance of non-textual legal origins. Any view of law or religion that is not based on conventional textual sources is therefore firmly opposed. As a result, the Wahhabist ideology has dominated Saudi Arabia’s legal system. The country’s legal system, as well as the role and nature of law in Saudi culture, provide a good indication of the connection between modern law, Saudi tribal system, and traditional law. Three important elements are based on the Saudi political and legal system: modern institutions, monarchy/tribal structure, and traditional Wahhabi Islam (the Wahhabi doctrine and the Hanbali School of Law) (Vogel, 2000). More so, traditional Islamic law, known as *Shariah*, is the legal framework in Saudi Arabia. Conventional Islamic law is a legal framework centred over the last fifteen centuries on some Islamic jurists’ and states’ religious documents and works. Saudi Arabia’s legal code is founded on the ideals of the rule of law. The *Shariah* is the Islamic code of conduct. The majority of Muslim jurists believe that Islam’s rule is systematic, holy, and spiritual. However, a growing number of Islamic jurists see *Shariah* as a legal framework built on divine values that is responsive to new situations and subject to critique (Esmacili, 2009). For a number of factors, Saudi Arabia’s very conservative style of official Islamic rule differs from that of other Islamic nations. One of these reasons is Saudi Arabia’s unique status as the cradle of Islam, with cities like Mecca and Medina representing the most orthodox school of thought, like the “Hanbali School and Wahhabi theory of faith and law”.

The Quran largely supported and maintained the current Arab practices and structures, according to some Muslim jurists, while incorporating reforms

required to eradicate undesirable customs such as usury, gambling, and infanticide (Marar, 2004). Even though Islam was coming from Saudi Region, pre-medieval and medieval Islamic schools (Azhar, Bagdad, Şam, Konya, Istanbul, Semerkand, Endulus) developed dramatically compared to desert Arabian Peninsula and they contributed more to the modern understanding of Islam, which Wahhabis were against. As a result, Arab religion and tradition converge to a large degree in Saudi Arabia, though Islamic values may not be compatible with their own ancient traditions in other areas of the “Islamic world”, notably the Indian-sub continent, Turkey, and Iran (Vogel, 2000).

This indicates that Saudi Arabia’s society and legal system are less likely than other Muslim countries to change and reform. To further clarify, Saudi Arabia is relatively unfamiliar with integrating into its existing political and legal structures of foreign influences, hence supporting puritanical and reactionary movements. As such, Saudi Arabia’s role as the origin of “Islam” sets restrictions on the likelihood of developing any major changes there. In such an environment, creating a rule of law requires significant reforms and longer periods. In Mecca and Medina, “the Quran, the most significant source of Islamic law was revealed” (Esmacili, 2009).

At least in ancient contexts, as well as in some contemporary Muslim cultures, tribal culture and law play a major role in Muslims and Shariah (Ibid). Acknowledging Saudi Arabia’s legal framework, as well as the essence of justice and the rule of law in society, requires knowledge of tribalism and traditional law. In four ways, pre-Islamic Arab traditions also penetrated the legal system of Islam (Vogel, 2000). First, even before the rise of Islam, certain laws of Shariah were followed in society. A large number of Islamic rules and customs confirm Arab values such as the basic concepts of contract and economic relations, as well as criminal law principles.

Second, while such customs practiced by citizens during the prophet’s lifespan were not strictly confirmed as law, they were not explicitly overruled either. Such traditions are considered to have Islamic recognition and referred to us “the Sunna al taqriyah (or taqir)”. Third, certain pre-Islamic Arab traditions continued in Islamic culture despite the fact that Islam did not recognize them and, in some cases, outlawed them. This group contains some tribal traditions that have survived, including Saudi Arabia. These tribal customs have existed for centuries and have played a significant role in the development of many Middle Eastern communities. Finally, tradition (urf) is an Islamic basis of law. In modern Saudi Arabia, tribal legislation and tribalism are still very powerful. The impression in the available English literature is that the legal system in Saudi Arabia is centered on Shariah, or Islamic law (Al-Atawneh, 2009). Islamic law is without a doubt the most important form of law in Saudi Arabia, particularly in areas of private law such as criminal law, inheritance law, family law, and contract law. In Saudi Arabia, however, tribal customs and law are relevant in relation to the political and governmental system of the country as well as personal and private areas. The impact of the tribal system on tribal customs in regional and national areas, as well as its role

in Islam's legal system, is particularly significant (Vogel, 2000). Saudi Arabia can also be said to have a legal framework based on contemporary legal standards or principles, tribal customs and *Shariah*. Tribal rule is evident in Saudi Arabia's public and political structure, as well as the culture of civilization and Islamic law. Saudi Arabia's legal system is focused on Islamic law (Shariah), tribal traditions, and contemporary legal standards in both criminal and civil cases since it is an Islamic republic.

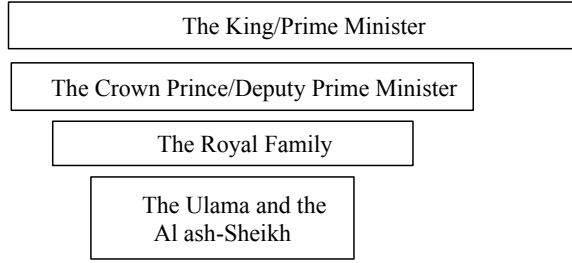
The King, who serves as a head of the judiciary and a kind of amnesty, is at the apex of the judicial system. The Saudi court's arrangement is divided into three parts. The Shariah Courts are the supreme in the Saudi judicial system, hearing the vast majority of lawsuits. The Shariah courts are classified into several classifications: First Instance Courts (Summary and General Courts), Cassation Courts, and the Supreme Judicial Council. The Board of Grievances (*Administrative Court*), which handles cases involving the law, is a supplement to the Shariah courts. The third section of the Saudi court system consists of different commissions that resolve particular problems, such as labor concerns, within government ministries. A plan to rearrange the justice system was approved in principle by a Royal Decree in April 2005. On October 1, 2007, a royal order endorsed the current structure. Among these reforms are the establishment of a Supreme Court as well as independent commercial, labor, and administrative courts.

4 CENTRAL GOVERNMENT

Saudi Arabia has a unitary government in which the central government in Riyadh makes the majority of decisions that concern state and local governments, including the country's decentralized administration hierarchy (Alkadry, 2015). The political hierarchy of the central government in Saudi Arabia is based on the doctrine of absolute monarchy. In Saudi Arabia's constitutional structure, the monarchy is the most important institution. The King is the head of state and administration, and he wields the majority of authority, including executive and legislative powers. The King exercises legal jurisdiction on occasion by possessing the right to pardon (Wilson, 2002). After extensive consultation with senior royal princes and also the religious establishment, decisions are finalized and carried out. The al-Saud family has ruled the Kingdom for so many years, with its premiership cemented by close association with the Wahhabi religious group (Peterson, 2001). The central government administers the affairs under the provisions of the holy Quran as well as other Islamic Laws.

The al-Saud royal family controls the central government and is the most powerful political force in the country (Pistrui & Fahed-Sreih, 2010). Though there are some political participations in central administration affairs from outside the royal family, these are quite limited and rare in most cases. Below is a diagrammatic representation of the central government's political hierarchy of the Kingdom of Saudi Arabia (Fig. 1).

Fig. 1 Political Hierarchy of the Central Government of the Kingdom of Saudi Arabia (*Source* Authors' Construct)



4.1 *The King*

The King of Saudi Arabia, who also serves as Prime Minister, is in charge of the whole administration. The mode of selecting the King is enshrined in the constitution of the country. According to the constitution, the King must be selected from the sons of the first King and their male heirs, with the consent of the religious leaders. In addition, the King, who serves as a final court of appeal and a means of pardon, sits atop Saudi Arabia's modern legal system (Al-Zahrani, 2017).

4.2 *The Crown Prince*

The "Crown Prince of Saudi Arabia" is the next in line after the King. He is royal family's member and has been designated as the successor to the throne. He is the second most important person in the country, designated successor to the King and deputy prime minister. When the King is absent, an order is given for the Crown Prince to handle the country's affairs before the King returns (Cochran, 2019).

4.3 *The Royal Family*

Saudi Arabia's political structure is dominated by the Saudi Royal Family. The Royal Family (Sauds) is relatively large and controls most of the central government positions. The Royal Family has exclusive access to key and major ministries. Thus, the political system in Saudi Arabia is characterized by the involvement and presence of members of the Royal Family at all levels of government (Jones, 2003) and discriminating other segments of the society.

4.4 *The Ulama and the Al Ash-Sheikh*

The Ulama is a group of Islamic religious leaders and jurists, and Al ash-Sheikh is Saudi Arabia's most powerful religious family (Sallam, 2013). The importance of the Ulama and Al ash-Sheikh is immense and these bodies play a crucial role in the administration of the country. The central role played by Ulama and Al ash-Sheikh in the Judiciary includes being the interpreters and

dispensers of the Sharia law. In the field of education and scientific research, they are in charge of the education system and the Ministry of Education. The Ulama have a say in every facet of life in Saudi Arabia, from the construction of highways to the quantity of oil to be produced as well as even the decision whether to allow American troops on Saudi's soil or not (Aljaouhari, 2014).

4.5 *The Executive*

The King governs by decree, following the “Shariah” and the wishes of senior princes and religious authorities. Islamic rule, the need for royal family members to reach agreement, and the practice of mediation all restrain the King. However, there is no procedural oversight and no internal checks on his authority, giving him broad discretionary powers. He controls fiscal, legislative, and judicial authority through his subordinates and cabinets. As Al-Ansary (2008) indicated, local councils, ministry subsidiaries, and other public autonomous and quasi-independent entities, in addition to the King and the Council of Ministers, make up the administrative power in the Saudi structure. The Council of Ministers is appointed by the King for a four-year term, and its members are accountable to him. The Council develops and implements general state strategy and oversees the smooth and productive operation of government agencies (Cordesman, 2003). The Council of Ministers, which is led by the King or Crown Prince, is the Kingdom's direct executive authority. It has the authority to formulate internal, foreign, diplomatic, economic, educational, and security policies for the nation. It performs the same role in terms of state affairs and then oversees their execution. Both ministries and other government departments report to it, and it has ultimate jurisdiction over their executive and administrative issues.

4.6 *Scope of Central Administration*

Saudi Arabia is a monarchical state administered by the al-Saud, a family that has for a long time (since 1906) ruled the Kingdom with the support of the Wahhabi religious group. The authors also observe that the primary basis of legislation is Islamic law, or Shariah, but the real promulgation and execution of legislation and policy is influenced by the ruling family's inner politics, political expediency, and inter-tribal politics, among other factors (Nyadera & Islam, 2020). The central government administers its affairs without a written constitution although it is guided by the “Basic Law of Government (Al-Nizām al-Asāsī li al-Ḥukm)” issued by the King in 1992.

This document lays out the rules for how the government can be managed, as well as the rights and obligations of people (Gvosdev, 2001). The King is in charge of the executive, legislative, and judicial branches of government. The King who acts as the Prime Minister of the Kingdom, presides over the “Council of Ministers (Majlis al-Wuzarāʿ) (Al-Zahrani, 2017)”. Domestic and foreign affairs, defense, education, finance, and health are among the executive

and managerial matters that the council oversees via various agencies (Huyette, 2019). The King has the prerogative rights of appointment and dismissal from the council. The Consultative Council (Majlis al-Shr), a new quasi-legislative body, was also formed under the Basic Law of Government.

Many professional experts make up the Consultative Council, which is made up entirely of individuals appointed by the King. The Consultative Council collaborates with the Council of Ministers in the preparation and promotion of legislation for King's consideration. Important decisions, on the other hand, are taken outside of the formal structures. The royal family, members of the Ulama (religious scholars), prominent tribal Sheikhs, and heads of influential commercial families come together to reach a consensus on important decisions.

4.7 *Administrative Position of Head of State*

The designation administrative position of head of state implies that the King is the highest representative of the sovereign state of Saudi Arabia. He is also the head of government of the state. The King of Saudi, on the other hand, is a monarchical head of state who must be chosen from the sons of the first King and their male descendants with the consent of religious leaders (Al-Zahrani, 2017). The royal family, the House of Saud, is led by the King. The King holds the title "Custodian of the Two Holy Mosques", signifying Saudi Arabia's management of Mecca's Masjid al-Haram and Medina's Al-Masjid an-Nabawi mosques (Delgado, 2015). For the fact that the King holds the position of head of state and head of government, he retains prerogative rights and duties associated with both positions.

4.8 *Ministries*

In 1953, King Abdulaziz bin Abdulrahman established the Council of Ministers to spearhead the various ministries. The Council of Ministers comprises the King as the Prime Minister, the Crown Prince as the Deputy Prime Minister, and Cabinet ministers. The Council's role is to spearhead the drafting and implementation of internal, external, economic, financial, defense, and policies in education and the state's overall affairs. The King or one of his deputies presides over the Council and meets every week to deliberate over various issues (Jiankang & Yanfeng, 2008). The number of ministries in Saudi Arabia keep changing under different Prime Ministers of the country. In most cases, Royal Degrees are issued for the renaming, creation, or dissolving ministries.

4.9 *Independent Agencies*

An important phenomenon in the administration of government business in Saudi Arabia is the presence of a large number of independent agencies.

Despite the fact that most of the departments fall under the control of a single ministry, they run independently and have their own budgets. Many other agencies are not attached to any ministry. Some of these agencies include the General Audit Bureau, the Investigation and Control Board, the Grievances Board, and the Organization for Public Services and Discipline. The latter three agencies are responsible for investigating complaints against government officials, hearing civil service employee corruption allegations, and enforcing punitive proceedings against a civil servant found guilty of malfeasance in office, respectively (Metz, 1992).

4.10 *Financing*

Before the twentieth century, the country had no formal money and banking system. For centuries, few banking functions were largely due to pilgrims visiting Mecca who had to change their monies in the country. In addition to Zakat and taxation, the Kingdom has oil and non-oil revenues. The petroleum industry generates about 87 percent of budget income, 42 percent of GDP, and 90 percent of export earnings. The increase in oil production saw the establishment of foreign and domestic banks. In 1927, the government issued a silver riyal to standardize the monetary units in operation. In 1952, the government established the Saudi Arabian Monetary Agency (SAMA) to serve as the central bank. The SAMA is responsible for the stabilization of the value of the country's currency in a transparent manner. The SAMA is also acting as the depository for all government funds, responsible for disbursing funds approved by the ministry of finance and national economy, regulating commercial banks, exchange dealers and money changers (Metz, 1992).

4.11 *Reforms in Central Governments*

With King Salman and Crown Prince Mohammed's accession to the throne, Saudi Arabia has continued to witness several forms of reforms in all aspects of the country. Since King Salman acceded to the throne in 2015 and coupled with his disposition for reforms, Saudi citizens have constantly clamored for economic reforms and political and social reforms from the central government. Current reforms include the Vision 2030 program to strengthen the private sector, create jobs for the Saudis, wean the economy off hydrocarbons, and attract foreign investment. Other significant reforms include the lifting of the ban on driving by women, removal of the requirement for women to seek permission from a male guardian in order to take a job, to undergo surgery, to enrol in university, to register childbirth, marriage, or divorce as well as the right to be issued family document without seeking permission from a male relative (Mina, 2020).

5 LOCAL GOVERNMENTS

Saudi Arabia is split into 13 provinces (amirates), each with a governor (Amir) appointed by the King. Provinces that are large and far more populated are further split into districts and subdistricts. The governors usually report directly to the king although they are supposed to report to the interior minister. In most cases, members of the al-Saud are given the position of amirate governors and deputy governors. The executive offices of the governors are located in the major towns of the respective amirates, despite the fact that none of these cities has been designated as the capital. The main responsibility of the governor is to supervise both central and regional government activities (Khagegkshi, 2005).

Also, the governors serve as commanders of the “Saudi Arabian National Guard units and local police and oversee local men’s recruitment into these security forces”. In addition, most of the governors emulate the king by holding public Majlis¹ on a day-to-day basis to hear complaints raised by residents. The governors recognize the Majlis as an important link between the government and the people. The governor either arbitrates the petitions, which relate to local disputes, or refers them to an appropriate court with special personnel who investigate local grievances and disputes (Alkadry, 2015; Metz, 1992).

The governors have one deputy (sometimes two) assisting them and, in some provinces, one or two deputy assistant governors double as governors’ assistants. In amirates that have been subdivided into districts, the districts’ officials are required to be subordinate to the respective amirate governor. In theory, the mayors of each amirate’s city, town, and village should report to the “Ministry of Municipal and Rural Affairs”, but in reality, they must report to the amirate governor (Metz, 1992). Metz (1992) observes that since the 1960s, numerous al-Saud Princes have been interested in forming amirate councils, which are elected or named bodies of local men who advise and assist the governor. However, and it was not until early 1992 that King Fahd confirmed the creation of amirate councils in each amirate, with nominal municipal authority to administer certain central government functions. However, King Fahd was able to introduce the idea of elected municipal consultative councils in 2003 (Alkadry, 2015). Half of the regional consultative councils were elected for the very first instance in the country’s history, while the other half were selected. However, all mayoral positions remain to be appointed by the government (Kraetzschmar, 2010). The local governments had very limited power, no power of the purse, and key local projects’ planning and funding is done by the central government (Khagegkshi 2005; Alkadry, 2015).

¹ Majlis: Is an Arabic and Persian term meaning “council”, used to describe various types of special gathering among common interest groups, be it administrative, social, or religious in countries with linguistic or cultural connections to Islamic countries.

The Amirates System introduced in 1940 came with some form of local organization (Alkadry, 2015). Under the system, the governor of each amirate² was charged with the responsibility of collecting taxes to engage in social, cultural, economic, and health development. Although the governor had to report directly to the Ministry of the Interior, he had no authority to interfere with his jurisdiction's administrative affairs. Alkadry (2015) inclines that though the governor could advise the local leaders, he had no authority over them. The governor had an administrative deputy whose role was akin to that performed by an under-secretary.

The governor also leads a seven-member local council that is responsible for the administration and execution of community policies and programs. The Amirates System was not very efficient and effective and encountered lots of challenges along the line. It did, however, serve as the foundation for both the "Muqataat and Manatiq" systems, which were developed in 1963 and 1991, respectively. The "Manatiq system" outlined three levels of government; "Mantiqah (region), Muhafaza (province), and Markiz (locality)". The governors were in charge of the Mantiqah's government, with the help of a deputy (a wakeel who performs duties equivalent to those of a country/city boss). The Interior Minister would also nominate and the Prime Minister would select the heads of administrative units. Furthermore, the Prime Minister will nominate ten educated people based on the governor's recommendation and authorized by the Interior Minister. The "Ameen-albaladiyya" is in charge of larger municipalities (provinces), while the "Raees-baladiyya" is in charge of smaller municipalities (ibid, 2015). The Saudi Arabian "Ministry of Municipal and Rural Affairs (MOMRA)" is in charge of providing technical assistance for decision-making, tracking, coordination, and reporting decision enforcement (Alkadry, 2015). The MOMRA, which was established in 1972, is in charge of overseeing local government functions such as urban and rural development, administration, and infrastructure projects. The MOMRA oversees personnel, local projects and municipal leaders must report to the "Minister of Municipal Affairs" (Khagegkshi, 2007).

The budget of local governments of countries all over the world usually consists of property taxes, other taxes, and fees levied at the local level. However, in Saudi Arabia, local bodies do not have the authority to levy taxes, and the few fees collected at the local level are not enough to fund local projects and administration (Alkadry, 2015).

The local governments do not have the authority to collect local revenue and in a few instances where they have the jurisdiction to do so, they go to the central government. Although the local officials make requests to the central government for funds to undertake projects, the central government only responds to these requests by managing major local projects centrally.

² Amirate: The term refers to any province of a country that is administered by a member of the ruling class, especially of a member of the royal family, as in Saudi Arabian governorates.

There is a lack of transparency and accountability regarding the size of the local government budget. However, the central government often allows mid-year adjustments.

The heads of local government make budget requests to the MOMRA for local administration. The MOMRA decides on whether or not to grant full or partial funds to these requests. The concerned local government's accounting division receives the grants from MOMRA and dispenses for the specific project following line-budgeting methods (interview). The local bodies do not have the authority to borrow funds to finance their projects neither do they have the authority to make investments on their own. Also, it is outside the jurisdictions of the local government units to raise property, income, or sales taxes (Abdulaal, 2012). Alkadry (2015) observes that there is a complete absence of a concerted effort to audit the performance of government both at the central and local levels. Habbash and Alghamdi (2017) argue that currently, Saudi Arabia lacks a system of program auditing or performance measurement. There is no organization or agency responsible for conducting performance auditing. Alkadry (2015) indicated that usually an evaluation report is written by the Emir of Mintiqa upon the completion of a project although there is no clear indication for him to do so.

Alkadry (2015) observes that in Saudi Arabia's central government and local government administration, benchmarking and performance assessment are common, but the mechanism is always vague. In Saudi Arabia, the federal government, the Manatiq emirs, and the local government are all responsible for productivity and effectiveness. For example, in 2003, half of the members of the municipal consultative councils have to be elected while the remaining were appointed. Also, there was a total overhaul of the organizational structure as well as reporting lines of many ministries. However, Garba (2004) observes that administrative changes tend to focus on bureaucratic structure rather than problems of financial empowerment, powerlessness, and local decision-making.

6 CENTRAL-LOCAL GOVERNMENT RELATIONS

The local government units and the Amara "Governate" are controlled by their respective central ministries (Abdullah Abdulaal, 2008). Three tiers make up the Saudi administrative structure: national, provincial and local councils. It was set up with many executive, legislative, and judicial bodies in 1975. At the central level, three tiers of national authority are divided by the Basic Rule of Governance: administrative, legislative and judicial, thus providing a certain degree of sovereignty that is parallel to the requisite coordination and trade. The King and the Council of Ministers, the Ministry of Strategy, which governs national growth planning, and the Ministry of Local and Rural Affairs, which oversees spatial planning at all levels and the provision of public services, are responsible for both administrative and legislative powers.

“The distribution of power between central and local powers has been ambiguous and indefinite. The personality of the King, as well as that of the Amir, plays a significant role in determining the power of the locality in relation to the centre” (Mlafekh, 2011).

Similarly, at the central level, in conjunction with the Grand Mufti, the Council of Senior Islamic Scholars (with religious authorities) interprets Holy Scriptures and provides the state with a religious context that can explain its policy/political actions (Almarshad, 2011). The Council of Ministers ultimately controls the executive and administrative affairs of all ministries, other federal departments, their regional branches, provincial governments, and all municipalities and rural centers functioning at the local level. In addition, by supplying financial services, technical support, advice, and training, ministries play an important role in enhancing political and administrative growth at regional and local levels. The Kingdom is divided into 13 provinces/regions at the provincial level, each of which is governed by a Governor (*Amir*) who oversees secondary governorates (i.e., subdivisions of provinces/regions) but does not have administrative powers to impose authority (Abdullah Abdulaal, 2008).

While the 1992 amendments (including the Basic Law of Governance and the Law of Provinces) expanded the governor’s authority to supervise and control provincial branches of central government’s performance, no key administrative roles were integrated into the additional duties. Accordingly, provinces/regions lack the requisite powers and authority to launch their own regional development plans and projects or to collect their own financial resources and to create their own budgets. These capacities remain in the hands of the Ministries of Central Affairs (Abdullah Abdulaal, 2008). At the level of the city, councils work within the government system at the local level and are engaged in the regular operation and growth of urban services. The three major bodies are classified into: regional municipalities, municipalities and villages, and rural centers. Municipalities and rural centers report to provincial municipalities (which have greater capabilities and may provide technical assistance) and work under the Ministry of Municipal and Rural Affairs’ direct supervision to facilitate a more centralized local administrative structure.

Corporate status and nominal financial and administrative control are retained by provincial counties, municipalities, and rural centers (Susilawati & Al Surf, 2011). In compliance with Article 9 of the Statute of Municipalities and Villages No. 5 of 1977, only half of the members of the Municipal Council are elected on a local government scale, while the other half are appointed (Dawod et al., 2013). While only partial elections are allowed by the legislation, the procedure itself reveals future measures to be taken in changes to decentralization (Al-Ghamdi et al., 2012). These measures have provided formal mechanisms on a small scale to enhance transparency and engage residents in municipal service decision-making systems that can actually address their needs.

Again, the local roles relating to the provision of utilities explicitly intersect (in various ways) with the central authorities' core functions. The services supplied include the following areas: infrastructure, housing, growth of population, environment, banking, community planning, and transport. Municipal and Rural Affairs, Housing, Labour and Social Development, Economy and Planning, Banking, Environment, Transportation, and others are the ministries concerned (Dawod et al., 2013). Many roles have been shifted from the central level to the state and local levels in the last ten years. This is demonstrated by the extended role of local authorities in the provision of construction and services. This move aims to strengthen decentralized governance (although further policy efforts are required to include a broader spectrum of industries and thoroughly formalize decentralized governance ideals) (Abdullah Abdulaal, 2008). An overlap/redundancy of roles relevant to the procurement of facilities and construction programs characterizes the bureaucratic framework of the municipalities, rendering implementation and long-term control a somewhat complicated and litigious method (Abdullah Abdulaal, 2008).

7 CIVIL SERVICE SYSTEMS

This section of the chapter discusses the civil service systems of Saudi Arabia. In charge of the Council of Ministers, a nine-member Board of the Civil Service exerted formal control over the personnel of all ministries, administration, and independent agencies. It was chaired by the Civil Service Bureau, which enforced the Civil Service Board's decisions and guidelines pertaining to grade classification, pay grades, recruiting and workforce requirements, and staff assessment. The number of civil service workers in Saudi Arabia grew significantly starting in the early 1970s as the government extended its social programs. By 1992, an estimated 400,000 people, including around 100,000 foreign nationals, were government workers. The total number of state employees, including Saudis and non-Saudis, was 1.23 million in 2017, down 0.8 percent from the previous year, according to SAMA. Saudi nationals accounted for 95.1 percent of the state's workforce (Al-Watan, 2017).

The number of independent entities has increased during the 1970s. Despite the fact that the majority of these departments were administered by a single ministry, each agency had its own budget and operated with a great deal of autonomy. Various departments were not linked to any single agency, including the General Audit Bureau, the Grievances Commission, the Inquiry and Control Board, and the Agency for Public Welfare and Discipline. Hearing charges of public service misconduct, investigating reports against government officials, and administrative action against civil servants charged and convicted of office improprieties are all handled by the following three departments. Civil servants were classified as either government officers (who accounted for three quarters of all government staff in 1992) or lower-paid employees. All civil servants were rated by grade, and merit and seniority depended on promotion. Training was given at each ministry as well as at the Institute of

Public Administration, an independent government agency with headquarters in Riyadh and branches in Jiddah and Ad Dammam.

8 REFORM PHILOSOPHY

The authors found that throughout the history of Saudi Arabia, several new public management reform strategies have been employed to make public administration accountable and responsive to the needs of changing times. These reforms were due to the high levels of nepotism (*wasta*), lengthy and time-consuming procedures, rigidity, and complicated set of rules and regulations, long lines of command, low productivity, among others. As such, the country introduced e-government into the administrative system (Gershon et al., 2018). Saudi Vision 2030, the bold development agenda of the new ruler, Salman bin Abdulaziz, seeks to diversify the economy by facilitating a transition away from public to private sector-led economic growth. However, the initiative has made little significant strides so far. In reality, following the murder of Jamal Khashoggi and the failure of several foreign (financial, investment, and media) companies to attend a high-profile investment summit in Riyadh in October 2018, the proposal has stalled. The government has tidied up some loose ends in current policy programs, such as granting more utility licenses to private owners and bolstering the government's drive to "Saudiize" private jobs.

On a more positive side, Saudi women made significant strides in 2017 and 2018. Women were allowed the right to drive for the first time in June 2018, when they were issued with driver's licenses. Saudi women are progressing politically as well. Women now have access to career training by government-approved centers and institutes, as well as restricted work opportunities. Saudi Arabia's traditionally patriarchal culture is gradually opening up to women's equality and rights [Bertelsmann Stiftung's Transformation Index (BTI) (2020)]. Recently, there have also been efforts to promulgate Artificial Intelligence but these steps have been baby steps.

In 2005, the Saudi Government embraced the implementation of e-government known as the Yesser Program (Alfayad & Abbott-Halpin, 2017). Program aims to provide faster and easy access to all government services to citizens and businesses. The program was to be implemented in two phases. The first phase called the First Action Plan includes the introduction of e-government projects in the public sector from 2006 to 2010. The Second Action Plan was launched in 2012 and expected to be completed in 2016 (Alassim et al., 2017). Due to challenges such as lack of qualified personnel, lack of ownership of data, lack of collaboration between government agencies, weak ICT infrastructure, Yesser is now focused on the provision of technical support to enhance the digital transformation of the public sector (Alfayad & Abbott-Halpin, 2017). Ahmed (2019) observes that reform efforts toward artificial intelligence (AI) have been widely embraced in all spheres of life in Saudi Arabia. Though technology is yet to be fully leveraged in the Kingdom,

for enterprise process improvement, planning, and offering solutions to challenging tasks, AI is now making waves in the fields of automation, accounting, finance, and industry.

9 NGOs/CIVIL SOCIETY

Since the end of the twentieth century, the space for Saudi political participation and civil society has grown; social change, which was first pushed by then-Crown Prince Abdullah in the late 1990s, has gained traction; and charitable organizations and the country's formal and informal associations have progressed. The Saudi state is built on absolute monarchy because it lacks a constitution, political groups, legally covered alliances, or unions. The royal family of al-Saud controls the government. The totalitarian state retains a tight apparatus of public defense and forbids all associations from functioning without official license and oversight. In contemporary Saudi culture, though, there are already some small openings: there is a lot of conversation about religious pluralism, culture, tolerance, human rights and reform. This discourse is supported by a number of state authorities, the conservative Muslim elite, and the kingdom's liberals. In Saudi Arabia, the number of civil society organizations has grown, their spectrum of operation has broadened, and human rights organizations have emerged; in short, Saudi media has become more diverse and independent, and some political reforms have occurred within some segments of civil society organizations (Montagu, 2010). The petition drive and the efforts of some segments of Islamists, as well as the participation of some Shiite academics and organizations, were among the voices of Saudi civil society calling on the Saudi state to reform.

The bulk of civil society organizations are approved by the Minister of Social Affairs as "charities", and they are closely monitored. In 2015, the cabinet approved an NGO law that allows Saudi citizens to operate NGOs within the framework of state law, but the law's potential role in the development of a vibrant civil society is unclear. Saudi Arabia's domestic charitable sector is diverse and extensive, including charities, non-governmental organizations (NGOs), "not-for-profit" organizations (NPOs), chambers of commerce, and technical and informal associations and groupings (Onder,). Many organizations are involved in this sphere, and there is a high level of understanding of civil society and its importance. The government, on the other hand, provides only small assistance, places limits on their activities, and, moreover, creates alternative official structures that can overshadow private organizations, such as the creation of two human rights organizations. In recent years, the charity sector has grown significantly. There were only 200 non-profits and ten madrassahs in 2008; now there are about 950 non-profits, including 600 charities with expanding operations and 70 madrassahs (Montagu, 2015).

The Civil Rights, Pluralistic, and Fairness Discourses have laid the cultural and ideological groundwork for civil society's increasingly active role, as well as a new common language within civil society organizations. All those reforms

and advances have brought a new socioeconomic, political, and academic climate to Saudi civil society. More structural space for civil society was created by the increasingly declining influence of the Wahhabi religious system and its decreasing hegemony over society. The state has often vigorously sought to curtail the influence of Wahhabi conservative intellectuals and to promote the efforts of those branches of civil society who oppose the religious establishment's conservative ideology to grow. Meijer et al. (2012) put it this way, within civil society, numerous organizations are participating and some elements within the state still support more reforms, on the other hand, is also faced with an oppressive state that continues to regulate and co-opt a large portion of it. The position of civil society in Saudi Arabia is also characterized by unique features. In Saudi Arabia, the position of civil society is negligible (Biygautane et al., 2017). Political parties are banned, and most current non-governmental organizations (NGOs) are government-funded, and the government controls and regulates their operations to a high degree.

There are three types of civil society in the landscape of civil society in Saudi Arabia: non-partisan; semi-political; and political organizations. The language of rights is one common thread between all. One speaks it louder and more vehemently than the other. Saudi Arabia's non-political civil society groups include a wide array of organizations. The most significant of them are: social groups, corporate sector, work, and empowerment for well-being, Chambers of Commerce, and community centers and neighborhood centers. More so, the semi-political organizations include but not limited to literary and cultural clubs, Diwaniyyat, Virtual Civil Society and Digital Media, Various Eastern Province Organizations.

While the Saudi regime does not allow independent civil society organizations, some do so by combining pre-existing associations or placing newly created ones under government control and prohibiting all others. A few independent, bottom-up organizations, based outside the control systems of the state, exist in Saudi Arabia. Individual Saudi people have founded these organizations without the permission of the government. Actually, the Human Rights Commission (HRC) is a civil rights department of the government. Its strategy of protecting human rights is closely connected to the political agenda of the state.

It has special links to the king and has the authority to enter prisons at any time and track prison conditions. The HRC sees its position as the ombudsman and receives 4,000 complaints a year on average. It has locations all over Saudi Arabia, including two dedicated to women. The HRC has published a number of brochures on the subject of human rights (van Geel, 2016). The NSHR has strong ties with the government as well, but it is more skeptical in general than the HRC. The NSHR, like the HRC, collects residents' complaints, intervenes with the relevant authorities on their behalf, and visits jails. In 2005, the NSHR tracked local elections and, in cooperation with foreign and community human rights organizations, visited over 30 jails (Le Renard, 2008).

Considering all of the constraints and difficulties that Saudi civil society faces, there are still some possibilities, although small, in terms of political and academic context, socio-cultural environment, state-civil society relations, as well as attitudes and behavior of some segments of the religious establishment. Overall, the language of freedom is strongly present. There is a lot of discussion, for instance, about human rights, reverence for diversity, the value of national unity, freedom of speech, opposition to violence, equality between men and women, criticism of fanaticism, encouragement of harmony, criticism of fundamentalism, and the battle against poverty.

On the value of openness, there are also several weak sounds. After saying that, it ought to be clear that Saudi civil society is far too frail to be the inexorable agent of democratization that many people consider it to be. Civil society, indeed, exists only to the degree that it makes no urgent institutional statements and forbids itself from having a direct impact on the political life of Saudi Arabia. Political society, on the other hand, has an influence on people's lives, encompassing a vast concept of impact that encompasses not only the final result, or how much control civil society has in a given region, but also the processes, or how successfully civil society has been engaged in a given area (Alhazmi & Nyland, 2015). To summarize, the Saudi monarchy clings to power through systematic surveillance, suppression of dissent, and the buying of popular support. Crown Prince MBS ordered a series of arrests in September 2017, suppressing opposition and bolstering his personal authority in the kingdom. The main goals were prominent preachers and reform activists. Many inmates were made to pay billions of dollars to the state in exchange for their release.

10 CONCLUSION

The authors accentuated that the present administrative and governmental structures have been superimposed over a strong religious fundamentalism and the old tribalistic patterns (Nyadera & Islam, 2020). Based on that, the country has attempted to harmonize Islam's teachings with industrialization and economic growth owing to the fact that it is an Islamic nation (Islam, 2021; Islam & Hossain, 2020; Islam, Bingöl and Nyadera, 2020; Islam et al., 2021; Islam, Önder, & Nyadera, 2020). Scholars examined that although the governmental systems of Saudi Arabia mimic comparable foreign organizations in shape, closer inspection shows a significant variation in the content.

10.1 *Administrative History*

With a rich historical background and a traditional background, the country has been built on a monarchical dynasty with lots of Islamic influence due to the fact that it is considered an Islam nation and Islam has its root in the country. Many scholars have attributed the country's inability to be colonized by the Western or even Asian countries because of the strong influence of

the country's religion (because Ottomans protected them). This has impacted the country's administrative reform both positively and negatively. In effect, the geopolitical situation has not been strategic with a weak military legacy as compared to some of the countries in the Middle East. Again, the country's administrative system is highly centralized with the King as the head of the executive making it conservative which has also resulted in overly politicized bureaucracy.

10.2 Constitutional and Legal Framework

Saudi Arabia is considered unique because its basic philosophy is built on the philosophy of Wahhabism. With the ideology of Wahhabism, it does not accept the non-textual origins of law and opposes any religious innovation. This means that any view of law and religion which is not based on conventional written sources of law is also firmly opposed. The country's laws are without a written constitution but based on Islamic laws. This traditional Islamic law known as Shariah, is the legal framework in Saudi Arabia. The authors further noted that three important elements are based on the Saudi political and legal system: modern institutions, monarchy/tribal structure, and traditional Islam (the Wahhabi doctrine and the Hanbali School of Law) which also guides the judiciary.

10.3 Central Government

The Kingdom of Saudi Arabia practices a unitary system of government where most of the decisions affecting regional and local governments are made by the central government at Riyadh though the country has a hierarchy of decentralized administration. The political hierarchy of the central government in Saudi Arabia is based on the concept of a complete monarchy that was laid on a foundation of system of belief in Islam. The King of Saudi Arabia, who holds the dual titles of head of state and head of government, is the supreme ruler of the world. After extensive consultation with senior royal princes as well as the religious hierarchy, decisions are finalized and implemented. Again, the central government administers its affairs without a written constitution although it is guided by the "Basic Law of Government".

10.4 Local Governments

The authors discussed the local government structure of Saudi Arabia. It was found that the Kingdom of Saudi Arabia is divided into thirteen provinces (emirates), each having its own governor (Amir) appointed by the King. Larger and more populous provinces are further divided into districts and subdistricts. The governors usually report directly to the king although they are supposed to report to the Minister of Interior. In most cases, members of the Al Saud are

given the position of amirate governors and deputy governors. The administrative offices of the governors are found in the principal cities of the respective emirates, even though none of these cities are made capital. The main responsibility of the governors is to supervise the work of both municipal and central government officials within the province.

10.5 *Civil Service Systems*

In sum, a nine-member Board of the Civil Service, in charge of the Council of Ministers, exerted formal control over the personnel of all ministries, administration, and independent agencies. It was chaired by the Civil Service Bureau, which enforced the Civil Service Board's decisions and guidelines pertaining to grade classification, pay grades, recruiting and workforce requirements, and staff assessment. Again, in each ministry and in the "Institute of Public Administration", an autonomous government institution with its main training center in Riyadh and branches in Jiddah and Ad Dammam, training is given. However, the system is highly politicized with the appointment of top management by the King.

10.6 *Reform Philosophy*

The authors found that throughout the history of Saudi Arabia, several new public management reform strategies have been employed to make public administration accountable and responsive to the needs of changing times. These reforms were due to the high levels of nepotism (*wasta*), lengthy and time-consuming procedures, rigidity, and complicated set of rules and regulations, long lines of command, low productivity, among others. As such, the country introduced e-government into the administrative system. Recently, there have also been efforts to promulgate Artificial Intelligence but these steps have been baby steps.

10.7 *Civil Society/NGOs*

The position of civil society in Saudi Arabia is characterized by unique features. In Saudi Arabia, the position of civil society is negligible. Although political parties are banned, most current non-governmental organizations (NGOs) are government-funded, and the government controls and regulates their operations to a high degree. The authors found that there are three types of civil society in the landscape of civil society in Saudi Arabia: non-partisan; semi-political; and political organizations which have had various impacts on the country. The various sections discussed in the chapter makes the country's public administration unique albeit complex (Table 1).

Table 1 Main Features of Public Administration System in Saudi Arabia

<i>Themes</i>	<i>Saudi Arabia</i>	<i>Situation/Explanation</i>
Administrative History	Geopolitical situation	Strategic
	Colonial history	No
	Legacy of bureaucracy	Yes (Empire)
	Centralized bureaucracy	Strong
	Role of military	Weak military influence
	Political culture	Conservative
	Administrative culture	Non-Participative
	Professionalism	Low
	Politicization of bureaucracy	High
	Dominant state ideology	Religious
Legal Structure	Nature of constitution	Unwritten
	Origin of constitution	Islamic Laws
	Strong constitution	No
	Constitutional rigidity	No
	Created by	civil initiatives
	Revised by bureaucracy	civil initiative
	Administrative judiciary system	Strong
	Central Government	State structure
Government structure		Absolute Monarchy
Hierarchical structure		Strong
Local extension agencies		too many
Central government		Yes & strong
Coordinating mechanisms		Existence of coordinating internal and external structure/agencies
Transparent financing system		Strong
Monitoring		Strong
Independent regulatory agencies		Exist
Local Governments		Financial autonomy
	Political autonomy	Weak

(continued)

Table 1 (continued)

<i>Themes</i>	<i>Saudi Arabia</i>	<i>Situation/Explanation</i>
Intergovernmental Relations	Council types	Council mayor
	Mayors	Appointed
	Decision making bodies	Exist /does not exist
		King Salman Center for Local Governance
	Central tutelage/monitoring	Exist & strong
	Subsidiarity principle	Exist
	Decentralization type	Deconcentration
Public Personnel System	Logic for Division of tasks	undefined
	Tutelage/monitoring	Strong
	Communication	Strong Formal
CSOs/Civil Society	Civil services	Career based
	Scope of civil services	91% of civil services
	Recruitment and promotion	Competitive fair
	Nationwide exam	does not exist
	Politicization in general	Strong
	Unionization	Strong
	Size of Civil Society	NGO membership, volunteering rates, % of GDP, employment
Reform Philosophy	Institutionalization	Weak
	Partnership with the state	Weak
	Political pressure/domination	Weak
	Major financial revenues	operating incomes
	Supportive national culture	Non
	Political regime & civil society relations	Non
	Civil society	Not prestigious
	Dominant reform paradigm	NPM reforms/ Governance reforms
	Policy Transfer	Policy adaptation
E-government reforms	not completed	
Artificial intelligence (AI) reforms	partial exist	

(continued)

Table 1 (continued)

<i>Themes</i>	<i>Saudi Arabia</i>	<i>Situation/Explanation</i>
	Influence of international actors	High
	New reforms (5 years)	National Transformation Plan 2020 and Saudi Vision 2030 Artificial Intelligence

Source Adapted and developed from Önder, M. & Zengin Ü. N. (2022). A Framework for Comparative Analysis: Public Administration Across the Globe. In *The Palgrave Handbook of Comparative Public Administration: Concepts and Cases* (Editors: Onder M., Nyadera I.N. & Islam, M.N.), Springer Nature Palgrave Macmillan: New York

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The Arab Republic of Egypt

Ülkü Nur Zengin

I INTRODUCTION

Egypt is geographically located in the northeast of Africa and it also has a connection with the Asian continent by the way of the Sinai Peninsula. Egypt has borders with Libya, Sudan, Israel and Saudi Arabia, located nearly Mediterranean Sea. Within the context of the location of the country, it can be accepted as a strategic point for Asia, Europe and Africa. Ethnically, around 91% of the population in Egypt is constituted by Arabs. If the Arabs are classified in terms of religion, 91.5% of them are Muslims and the rest are Christians. Copts are also an ethnically important element in the Egyptian population. The entire Coptic population is Christian. Despite having a different mother tongue, Copts speak Arabic today. There are also different Muslim ethnic groups in the Egyptian population such as Berber, Beca, Nubian and Albanian (Özer, 2014: 13).

The MENA region, where the hardest conflicts have been going on for the last half century, is one of the centers of ancient cultures and settlements in the world. Maintaining its importance throughout human history, the region has witnessed numerous struggles and remained under the hegemony of different powers in different periods (Nye & Welch, 2014: 229; Islam et al., 2020; Islam et al., 2021; Nyadera & Islam, 2020). As one part of this chaotic mosaic, Egypt has been one of the prominent countries in the region with

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its Suez Canal, its coast on the Red Sea and the Mediterranean in addition to its strategic location by considering world trade routes (Yılmaz, 2016: 101). In other words, from ancient periods to today's modern era, Egypt is one of the *sine qua non* (necessary) dossiers to analyze.

To focus on a part of this thick dossier by avoiding losing the focus and clarity, this part of the book touches upon the significance of administrative tradition of Egypt. As a matter of fact, Egypt is quite remarkable in terms of public administration studies due to its very different experiences. Kings, dictators, colonial era and military interventions are the cornerstones of the administrative history of the country.

Egypt is the greatest civilizations in Antiquity. Its foundation goes back to around 3.050 BC. In 31 BC, it was invaded by the early Roman Empire by ending the rule of Pharaohs, and then it became a province of Rome for so many years. The Byzantine Empire controlled the country between 395 and 642 years. Islamic Empire took charge in 642 and Egypt became a Muslim-Arab country. Sunni Islam spread in Egypt for a short time and was governed by the Egyptian Fatimis, Mamluks and Ayyubis, which were controlled by the Islamic Caliphate for many years. Later, in 1517 Yavuz Sultan Selim incorporated Egypt into the Ottoman territory after the Ridaniye Battle. Egypt became a Khedivate including Sudan in 1805 and lasted until 1914 (Winter, 2008: 41–42).

French occupation (1798–1801) and British occupation (1892–1922) eras are the colonial periods of the Egyptian history. Anyhow it was a state of Ottoman Empire until 1914, England, has established an indirect but highly effective system of control over the Egyptian government (Roberts, 2015: 29). After the unilateral declaration of independence from the United Kingdom on February 28, 1922, the Sultanate of Egypt was founded and it became a constitutional monarchy in 1923. In 1953 after the first military coup made by Abdul Nasser, it was proclaimed the Republic of Egypt.

The current situation of the Egypt also presents an important issue of the democratization processes in the developing countries. It is a known fact that the country has been ruled by kings and dictators from 1801 until 2011. The mass movement, which is the reflection of the Arab Spring in Egypt and called the “Nile Revolution” or “Full Revolution” (Yıldırım & Abdulcelil, 2011: 5), supported widely by the people with the help of social media. Presidential elections were held after the events that resulted in Hosni Mubarak's resignation and Mohammed Morsi was elected President with 52% of the votes. However, Egypt's experience of democracy did not last long, and in 2013 the army under the command of Abdul Fattah al-Sisi took over by the way of military coup. The Arab Spring movement, which started with democratic demands, resulted in a more authoritarian rule in Egypt (Şahinoğlu & Ateş, 2017: 111).

These developments and the ongoing military administration have impacts on the region since Egypt as the heartbeat of it. In other worlds, Egypt's size and historical importance make it one of the most influential countries

in the region. Having the largest population, the largest army and the third-largest economy in the Arab world are among the factors that contribute to this effect. Situated in the center of the Arab world, the country is strategically located due to its dominance over the Suez Canal. The Suez Canal, one of the most important trade routes in the region, is also an important source of income for the country. Al-Azhar University, which is located in the country and known as the most important education center of Sunni Islam, forms the basis of Egypt's soft power over Islamic countries. In addition, many doctors and engineers trained in the country work in other Arab countries. For all these reasons, Egypt seems to be a model country for the Arab world. Therefore, understanding Egypt's administrative structure actually plays a key role in understanding the region (Ruthford & Sowers, 2019: 1–5). Apart from all of these issues, Egypt has chosen as a sample of this book for analysis in terms of the democratization process and obstacles of democracy in the developing countries.

2 ADMINISTRATIVE HISTORY

The very first historical example of bureaucracy was seen in Ancient Egypt, which Max Weber described as the first example of the patrimonial bureaucratic state type (Çevikbaş, 2014: 82). However, it was possible to talk about the bureaucratic state in Egypt in the modern sense by being a part of the Ottoman Empire.

After the Romans, the Byzantine Empire control, Egypt became a Muslim-Arab country in AC 641. It was governed by the Egyptian Fatimids, Mamluks and Ayyubis until 1517. Yavuz Sultan Selim's Ridaniye Battle destroyed the Mamluk Sultanate and incorporated Egypt into the Ottoman territory. Egypt was a state of the Ottoman Empire in the early nineteenth century, and became a Khedivate, including Sudan (Winter, 2008: 41–42).

When France invaded Egypt in 1798, Mehmet Ali Pasha, who came to Egypt to fight against the French, took advantage of the authority vacuum that emerged after the occupation ended and took the governorship of Egypt. The reign of Mehmet Ali Pasha in Egypt, who caught the freedom of movement within the Ottoman world, began in 1805 when Selim III appointed him as governor and ended in 1849. Mehmet Ali Pasha carried out a radical administrative reform in order to preserve his sovereignty against Istanbul. Thanks to these reforms carried out in every field, especially in the military and economic field, a central and permanent political power was established in Egypt (Diriöz, 2012: 84).

The bureaucratic structure established by Mehmet Ali Pasha had two characteristics. The ruling group of this political structure with Mehmet Ali Pasha at the top is the Ottoman-Egyptian elite. The central organization in Egypt was based on the "households" formed by the Ottoman administration. Members of the households of Mehmet Ali Pasha, who constituted the ruling elite of Egypt, were not constantly serving in military and civilian positions,

but were subjected to rotation. In this way, no one could get strong enough to rebel against the sovereign by staying in the same position for a long time. The second feature was the strict distinction between the Turkish-speaking elite and the Arabic-speaking masses. It can be said that until 1952, the cultural, economic and class structure of the Ottoman-Egyptian elite was one of the important elements of the administration of the Kavalali dynasty, albeit with a change. Although this ruling elite became increasingly Egyptian by the last quarter of the nineteenth century, it left behind a political wisdom in which a strict separation of ruler and ruled survives (Toledano, 1990: 16–20).

Having a regular army has been a priority for Mehmet Ali Pasha to realize his political goals. For this reason, military reforms have been the driving force in terms of modernization in Egypt, as in the Ottoman modernization. In fact, Egypt became one of the rare Arab states where steps similar to Ottoman modernization were taken earlier from time to time and a new and permanent political power could be created. In this sense, it should be said that Pasha is the “founder of modern Egypt” (Özkoç, 2014: 225).

Mehmet Ali Pasha started by changing the tax system. Because the direct collection of taxes and the increase in agricultural production by tight control of the land would mean that the income needed for military reforms would flow directly to the center. In order to increase agricultural production and ensure its continuity, it institutionalized the attachment of the group named Fellah to the land, which is interested in agriculture. Mehmet Ali Pasha developed a protective system for agricultural activities that prohibited damaging agricultural products. Having succeeded in establishing a “monopoly economy,” Pasha banned the merchants from buying products directly from the fellah and kept the exports of the products. He bought from the producers at a fixed price to the international markets. In this respect, it should be underlined that in the period of Mehmet Ali Pasha, a “modern” and “complex” economic structure was created by centralizing the production process (Özkoç, 2014: 230).

In fact, Mehmet Ali Pasha was not the first to attempt to control agricultural production and the economy from Cairo, but it was he who succeeded and sustained this, at least until 1840. The main feature that distinguished Pasha from his predecessors was that he managed to keep this process continuous. Therefore, in the nineteenth century, with Mehmet Ali Pasha, the government started to function in a continuous and uniform manner for the first time.

Mehmet Ali Pasha’s administrative reform envisaged full domination of the whole country, even to the most remote regions. The administration in the center and in the states was based on strict centralization. For provincial organization, in 1826, the country was divided into twenty-four provinces, fourteen in Lower Egypt and ten in Upper Egypt. Each province was divided into districts, sub-districts and villages. A state administrator named “director” was appointed to each province, directly affiliated with Mehmet Ali Pasha. In

particular, the directors were responsible for ensuring security, regular collection of taxes, supervision of agricultural production and continued recruitment (Hunter, 1999: 20).

Addressing the origins of Egyptian modernization is important in revealing the historical ties of the developments after the uprisings that started in Egypt in January 2011. The point that should be underlined in this regard is that the power structure created during the period of Mehmet Ali Pasha left an important administrative “mind” and “strategy” to Egypt in the twentieth century. This continuity can also be seen as one of the sources of authoritarianism, in which the masses are oppressed by small ruling elite (Özkoç, 2014: 245).

During this period, seven regional geographic authorities in Egypt are established under the rule of Mehmet Ali Pasha. The turning of administrative system into a council is realized by Khedive Ismail Pasha at the end of the nineteenth century. He brought a structure where ministries and affiliated units became more professional in the field related to their duties and services. This central structure survived until the middle of the twentieth century (Abdulrahman, 2016).

England, meanwhile, has established an indirect but highly effective system of control over the Egyptian government, setting the benchmarks for managers who are advisor-qualified. Cromer, who served as British governor for 24 years (1883–1907) during the colonial era of Egypt, was decisive. Cromer’s policy in Egypt coincides with the Ancient Colonialism understanding. In other words, it supports the continuation of the occupation of Egypt. The invasion of Egypt brought two main benefits to Britain: textiles to provide the cotton needed by its textiles factories in a cheap way and to ensure the safety of the sea route to its colony India with the control of the Suez Canal. Country administration and economic activities were determined by considering British interests, not the development of Egypt (Yaramış, 2007).

British colonial era came to end in 1922. After his unilateral declaration of independence from the United Kingdom on February 28, 1922, Ahmed Fuad Pasha took the title of King F. I. of the Sultanate of Egypt. The new constitution entered into force in April 1923. With this constitution Egypt was brought into a constitutional monarchy. The constitution determined the executive powers of the king and formed a two-chamber legislative body. By law, all members of the House of Representatives, half of the members of the Senate, will be elected by direct election. It must be noted that independence and constitutional administration in Egypt were never fully established by considering the reasons such as the never ending political struggle of the king, the impact of the Wafd Party and the role of the United Kingdom (Roberts, 2015: 29–30).

Chaos and confusion in the political life increased year by year and in 1952 it peaked up. Free Officers group staged a coup and Farouk has overthrown in that year. Colonel Jamal Abdul Nasser was the leader of the group. The military has been injected into the politics directly by this coup and it is still going on (Roberts, 2015: 30–31).

Although Nasser was “blessed” as the Egyptian people’s first Egyptian head of state, this time he embarked on a different kind of modernization move, with a small clique in which the army played a dominant role. It can be said that this military-based clique absorbed the economic sphere over time and built an authoritarian regime in the political sphere, reproducing a rigid division of ruler-ruled whose ethnic character was differentiated with a historical memory. This structure continued to exist from the Nasser era until the 2011 revolution, although the content has changed.

The establishment of the United Arab Republic was realized by Nasser. Nasser’s primary goal, which remained in power until 1970, was centralizing the state power. During Nasser’s period, nationalization was the basis of all socio-economic activities in relation to the bureaucratic structure. During the Nasser period, the state adopted the responsibility of holding the industrial, economic, service, social welfare and national security sectors. In the period between 1952 and 1972, the number of public employees increased 5 times from 250,000 to 1,200,000. Even this rate is important in terms of showing the growth in the state (Mayfield, 1996).

The ten years between the periods of 1970–1980, Al-Sadat served as the President of the Republic. In 1971 constitution, the country was called as a republic with a democratic, socialist system. The president served as head of state, and he appointed the prime minister. In this period, there was a change in the direction of policies based on market economy. Sadat sought to strengthen the government’s authority while trying to narrow the interventionist side of the state. Reforms were also made to improve the public administration system during the Sadat period. Regulations on civil servants in 1976, the “administrative revolution” in 1977 and the legal regulation envisaging the election of local government bodies in 1979 are examples of these reforms. However, these efforts failed to achieve the goals of improving the system and increasing welfare (Ayubi, 1982).

Sadat’s vice-president, Hosni Mubarak, became president after him. Mubarak immediately put the country under martial law, where it remained for his entire term in power. The reason for this was declared as the necessity of fighting Islamic terrorism. Mubarak ruled Egypt with an iron grip until early 2011, when protests began throughout the country. On February 11, Mubarak was removed from the administration by a military coup. One month later, in order to enable a new constitution making, the 2011 Constitutional Declaration was developed and then adopted by the Supreme Council of the Egyptian Armed Forces (Miş & Telci, 2013: 21).

Later that year, the once-banned Muslim Brotherhood re-emerged as a potent political force when they won nearly half the seats in voting for the new parliament. In June 2012, Morsi won the first democratic presidential election and became the first elected president of Egypt with 51.7% of the votes. The work that began in the parliament to draft a new constitution in 2012 has heightened the tension between the Islamist power and the secular, liberal and Christian opposition. The ratification of the constitution that was

aimed to end the rising tension was realized with a national referendum in December 2012. However, this solution did not prevent the problem and tension between groups was continued until the military was coup made in 2013 (Miş & Telci, 2013: 23). Since then Abdel-Fattah al-Sisi is in the power and a new constitution was made in 2014 under military control.

The presence of the army in the political scene at all critical stages after the Egyptian revolution is also the result of the historical continuity of the military-centered nature of Egyptian modernization. Although the content, nature and structure of the army have changed, it continues to be one of the most important actors in the Egyptian political sphere. The Egyptian army attained the power to fill the power vacuum that emerged after the liquidation of the Islamic movement that came to power with a democratic election for the first time, precisely because it is located at the core of the authoritarian structure. As in Egypt, where political organization is weak and non-governmental organizations weak, it does not seem possible to talk about the existence of an active political subject other than the army yet.

3 CENTRAL GOVERNMENT

Current constitution of Egypt has accepted in 2014. The constitution begins with the indication of the sovereignty of Arab Republic of Egypt and its united and indivisible structure based on democracy.

The political system of Egypt has explained the 5th Article of the constitution. Within the context of the article, Egypt's political system is explained by mentioning the importance of the separation and balance of powers. In addition to this, political and partisan multiplicity is also emphasized to provide transfer of power. Respect for human rights and freedoms is accepted as the basis reason for this check and balance system in the political system.

3.1 *Executive Branch*

The President of the Republic is the head of both state and executive branch. The President is elected for a period of four calendar years, commencing on the day the term of his predecessor ends. The election of the President of the Republic has regulated with an amendment in 2019. President could be elected for two periods of four calendar years according to the previous regulation but it has changed. The first term of the current President (Abdulfettah al-Sisi) started in 2018 with the announcement of the results of the Presidential elections. It will end after 6 years, and the same President can be selected once again. In this way, the first period of al-Sisi will end in 2024 and then he can be Presidential candidate again. In the situation of being reelected, he will be able to continue his Presidency until 2030. This regulation is interpreted as a way of furthering the military tutelage (Ugan, 2020: 187).

To be accepted as a candidate for the presidency, candidates must receive the recommendation of at least 20 elected members of the House of Representatives, or endorsements from at least 25,000 citizens who have the right to vote, in at least 15 governorates, with a minimum of 1,000 endorsements from each governorate. The President of the Republic is elected by direct secret ballot, with an absolute majority of valid votes (Fig. 1).

In Egypt, government represents the supreme executive and administrative body of the state including the Prime Minister and the ministers, and their deputies. The Prime Minister is accepted as the head of the government and appointed by the President with the approval of the House of Representatives. Council of Ministers is accepted as the highest executive and administrative

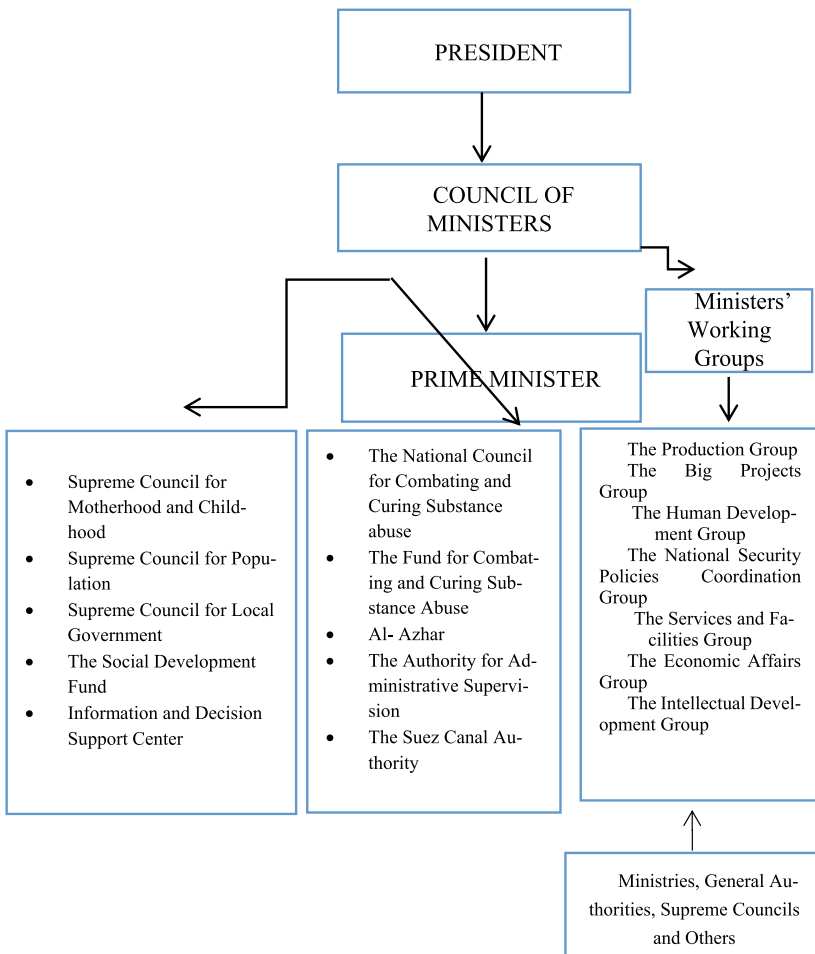


Fig. 1 The organizational chart of the executive branch of the government of Egypt (Source Developed by the author)

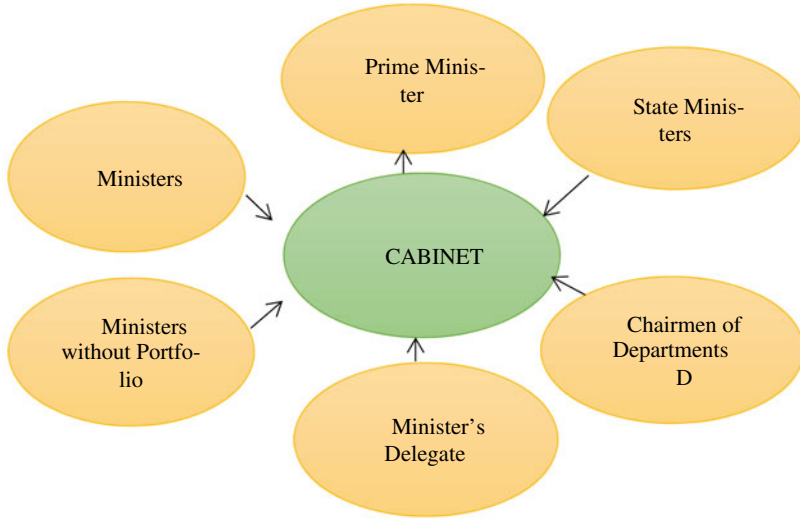


Fig. 2 Structure of cabinet (*Source* Developed by the author)

body of the government that is controlled by the Prime Minister. The ministers are jointly working on the general policy of the pre-peoples government, and every minister is responsible for the duties of the ministry (sis.gov.eg).

Parliament has the right to draw trust from the ministers or any member of the Council of Ministers.

Structure of the Cabinet: Currently there are 39 ministers in the government. Most of them are heads a ministry and these are called **Full Ministers**. Ministers of State, that are also named as junior ministers, work on specific assignments of agencies. Ministers of states generally focus on issues covering specific short-term government priorities.

Ministers without portfolio: They are not assigned in specific departments and occasionally attend cabinet meetings, e.g., the former Vice President of Egypt.

Chairmen of Departments: They control critical departments that do not fall under the jurisdiction of any of the ministers and answer directly to the Prime Minister, e.g., The Chairman of the Suez Canal Authority.

Ministers-delegate, who assist ministers on issues related to their duties and rarely attend cabinet meeting (Fig. 2).

3.2 *Legislative Branch*

2014 Constitution of Egypt regulates the legislative branch in Articles 101–138. The House of Representatives (Majlis Al-Nowaab) has power concerning legislative authority. In this sense, approving the general policy of the state, the general plan of economic and social development and the state budget is

authorized by the House of the Representatives. It also provides the critical control over the actions of the executive authority which is mentioned detailly in the Article 101.

The House of Representatives is composed of at least four hundred and fifty members that are either directly elected or elected through secret public balloting. Types of elections cover the majoritarian system, proportional list or a mixed system of any ratio. According to the Article 102, the President of the Republic may appoint a number of members that does not exceed 5%.

The validity of the resolutions issued in the House is only accepted as applicable with the attention by the majority of its members. In Article 121, it is also stated that except for the conditions that require a special majority for decision making, resolutions are decided and adopted by present majority members (Fig. 3).

The President of the Republic, the Cabinet and every member of the House of Representatives have the right to propose laws. Each and every bill that is presented either by the government or members of the House with one-tenth percentage is referred to the committee of the House for submission of a report based on the issue. According to the type of the issue, the committee has right to take advice from the experts. The very first condition that must be provided is the permission of the proposals committee and then its approval by the House. In case of the rejection of the bill by the proposal committee, the reason of the refusal must be explained. The rejected bills or proposed law

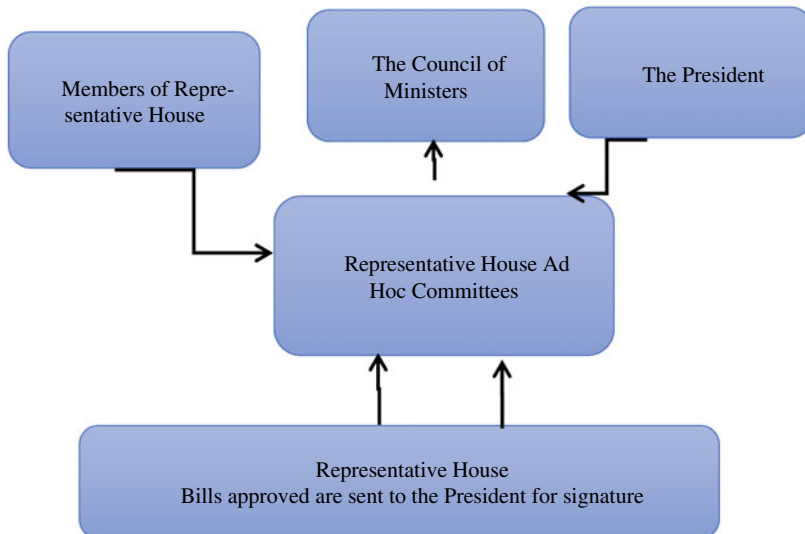


Fig. 3 Law making process in Egypt (Figure is adapted according to the constitution). (Source Developed by the author)

by the House will not be taken into consideration for presenting during the same legislative period as it is mentioned in the Article 122.

The President of the Republic has power for both issuing and rejecting laws. If a draft law that has been approved is rejected by the President, the house must be informed about this situation in 30 days. After 30 days, it is accepted as law. In normal case that covers the situation of informing the House in 30 days period, and majority of two-thirds of House members approve the issue, it is considered as law in accordance with the Article 123.

Article 137 demonstrates the conditions that cover the dissolution of the House of Representatives. Except for specific necessary condition that is indicated as a causal decision and following a public referendum, the President of the Republic may not dissolve the House of Representatives. In addition to this, The House of Representatives may not be dissolved by demonstrating the same reason that has caused the previous dissolution of the House. The President is supposed to issue a decision to suspend parliamentary sessions and hold a referendum on dissolution within no more than 20 days. In case of agreement between the voters, the President has power to give the decision of dissolution that would bring about early parliamentary elections. 30 days are determined time period for applying this process that begins with the date of the decision's issuance.

3.3 *Judicial Branch*

Egyptian law has experienced a struggling radical institutional change over the last 150 years. Starting from a largely uncodified Islamic law system and turning into a highly centralized France's civil law system have not been an easy step for Egypt. The last quarter of the nineteenth century witnessed mostly adoption of European law, including the Napoleonic Code. After regaining independence, however, the Egyptian legal system has turned its Islamic roots which includes attempting to Islamic tradition. The very first step to this is the Sanhuri Code that is chosen instead of the Napoleonic Code in 1949. In accordance with these developments, the adoption of Article 2 in the Constitution in 1980 demonstrates the recognition of the Shari'a as the source of legislation for the Egyptian state. (Fadel, 2013: 646).

The Egyptian legal system is based on three sources of legitimacy. The first is the uncodified tradition of Islamic law, which can be accepted as a combination of the modern Egyptian state structure with its Islamic roots. The second is the legal transplant taken mostly from Europe and symbolizes the Egyptian state's commitment to develop various institutions of a modern state. In this sense, it is aimed that the rule of law recognizes the responsibility of the state. With this step, promotion of the economic, social and even moral development of the state and its citizens will be guaranteed. The third source of legitimacy of the Egyptian legal system is the positive legislation of the modern Egyptian state that will provide articulation of an Islamic legal sensibility which will be consistent with the modernist project (Fadel, 2013: 648–649).

The judiciary is independent in Egypt. It is vested in the courts of justice of different types and degrees, which realize their judgments based on the law.

The Military Judiciary is an independent judiciary that judges entirely in all crimes related to the armed forces including its officers, personnel and their equals in addition to the crimes committed by general intelligence personnel during and because of the service.

All judicial bodies administer their own affairs. Each has an independent budget decided by the House of Representatives. Judges are independent, cannot be dismissed and are subject to no other authority. They are subject to the law and have equal rights and duties.

Public Prosecutor: In Egypt, the Public Prosecutor and the Public Prosecution Office heads have different seats in judicial structure and are not subject to executive branch authority or control (Article 189). The duties of this branch include investigating, pressing charges and prosecuting all criminal cases except what is exempted by law. Public prosecution is accomplished by a Prosecutor General selected by the Supreme Judicial Council.

Courts: In the 2014 constitution, it is stated that all judges and justices are selected by the Supreme Judiciary Council and are appointed by the President. Judges appointed for life. Courts are contextualized into three branches according to the issues they are interested in (Fig. 4).

Supreme Constitutional Court: It is accepted as one of Egypt's most powerful and self-governing institutions. It takes its roots from a history of battles with authoritarian regimes and from rejected laws. These laws excluded certain groups from political participation or developed in favor of government-approved political parties (Grote, 2016: 681). Article 192 of the 2014 Constitution provides that the Supreme Constitutional Court (SCC).

is exclusively competent to decide on the constitutionality of laws and regulations, interpret legislative texts, and adjudicate in disputes pertaining to the affairs of its members, in disputes between judicial bodies and entities that have judicial mandate, in disputes pertaining to the implementation of two final contradictory rulings, one of which is issued by any judicial body or an agency with judicial mandate and the other issued by another body, and in disputes pertaining to the implementation of its rulings and decisions.

The SCC is made up of a president and a sufficient number of deputies to the present. At the present, the number of deputies to president is ten.

The constitution also provides for the appointment of a body of commissioners, who are judicial officers serving as advisory staff to the court.

Provisions introduced with the Constitutional amendments made in 2019 are also important for public administration. The changes made by the military administration can be summarized as follows (Ugan, 2020: 187–190):

- President of the Republic appoints the heads of judicial organs and authorities and the Egyptian Chief Public Prosecutor. This can facilitate

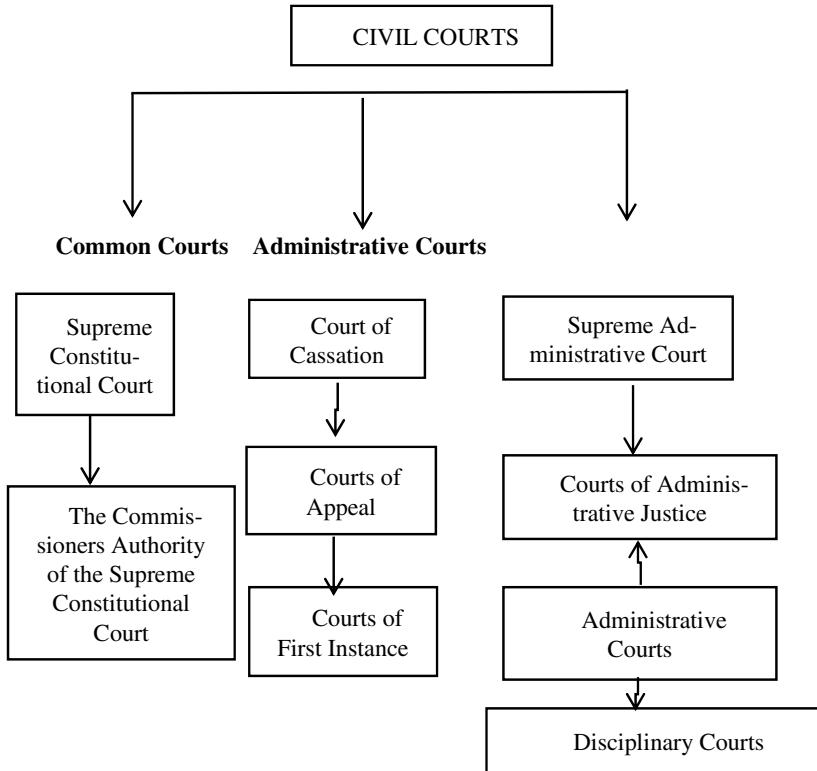


Fig. 4 Civil courts in Egypt (Source Figure is developed by the author)

appointments based on political or other interests, increasing the risk of influencing decisions and causing violations of authority. Therefore, it may harm the independence of the judiciary and the rule of law.

- The phrase of “the army protects the constitution, democracy, the civil structure of the state, the gains of the people, individual rights and freedoms” was added to the article about the duty of the army. The Egyptian army, which already has a strong position in the country and has broad powers, is legally strengthened further with this additional article; the scope of military intervention has expanded and all kinds of military interventions are guaranteed by the Constitution.
- The 2014 Constitution gives comprehensive power to military courts to try civilians. However, this scope was further expanded with the Amendment. In this way, the jurisdiction of military courts was extended to include crimes committed in any public property or a vital facility. Therefore, even if there is no direct attack on the military building or military personnel, civilians may be tried by a military court.

- A Senate (Council), which will assume the role of the Council of Ministers, which is the upper wing of the parliament abolished by the 2014 Constitution, will be established next to the House of Representatives. Two-thirds of the Senate, which will consist of at least 180 members, will be elected by the people, and the remaining third will be appointed by the President. The Prime Minister, Ministers and other members of the government will not be responsible to the Senate. This will further increase the executive's influence on the legislature.

As a result, despite the Constitution that adopts the separation of powers, it is seen that the executive has an important superiority over other organs as a result of the military administration in practice. As an important reflection of this situation, politicization in bureaucracy also takes place at the top level. Considering that merit is not prioritized in a government dominated by ideological appointments, it will be seen that professionalism is negatively affected by this situation.

4 LOCAL GOVERNMENTS

Egypt has always had a very central administration structure since the time of the Pharaoh. The geographical conditions of the country also required this centralist structure. Therefore, despite all reform initiatives, local governments function as a part of the central government. The Egyptian administration is still organized on the basis of a strong hierarchical vertical structure (Vazquez & Timofeev, 2008: 10).

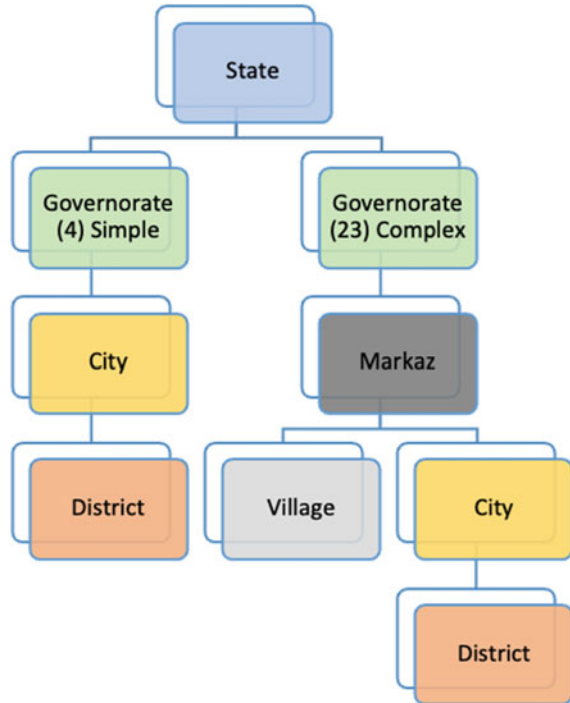
4.1 *Structure of Local Governments*

The current structure of local governments is regulated by Law 43 of 1979. Egypt is divided into 27 administrative units called governorships. Governorships are divided into two as simple structured governorships covering only urban areas and complex governorships covering urban and rural areas. There are three levels of administration in simple structured governorates: governorship, city and district. In complex governorships, there is a four-level management system in the form of governorship, markaz, city/village and district (Abdulrahman, 2016) (Fig. 5).

Governors are the highest representative of the central government in the governorates and are appointed directly by the President. There are 3 higher positions in each governorate except the governor: deputy governor, general secretary and deputy secretary general. The deputy governor is appointed by the president, others by the Prime Minister. The directors of other administrative units are appointed by the Prime Minister (Abdulrahman, 2016).

All local governments consist of two councils: The local council and the executive council. Members of the local council are directly elected by the

Fig. 5 The structure of public administration in Egypt (*Source* Developed by the author)



people. Their duties are to supervise and control all institutions and activities at the administrative level where they are held and overseeing the lower local councils. Local councils have the power to approve all plans and budgets of the executive council, where they serve at the same administrative level. In addition to central taxes, local taxes can also be imposed on the proposal of local councils (Mahmoud, 2012). Executive councils are boards with appointed and elected officials. Appointed officials are representatives of the central government to represent different service and manufacturing sectors. These officials appointed at the governorship level are the deputies of the ministers and serve as the head of the provincial organizations of the ministries. The executive councils are the executive unit of administrative structures. The main duties of the executive committee include conducting the general policies of the government, monitoring all activities performed by the executive units, and ensuring adequate performance for all services and projects. It is also responsible for creating budget plans and submitting proposals for the allocation of resources such as funds and investments to be approved by local councils. The executive council should also adapt rules and regulations to manage and use land under its jurisdiction at its level. It should also set rules and regulations for building, housing and urban planning (GOLD, 2007).

The governor is the highest administrative officer representing the central government at the governorship level. The governor has the power of president as he is appointed by the president, and he expires at the end of his presidential term or can be dismissed by presidential decree. He is the chairman of the executive board of the governorship and has the authority to represent the governorship. It also has jurisdiction over all other civil servants working within its jurisdiction and belonging to central government sectors and organizations. It has the power to recommend the referral of any employee to a position outside the governor's office, to recommend the promotion of employees, to request questioning and to impose penalties within the pre-determined powers of the appropriate minister. The main duties of the governor are to supervise and implement all the goals and policies of the central government under the governorship (Law 43/1979).

Besides the previous councils, there are two other bodies that are directly related to the local government system. One of them is the Governors' Council. Minister of Local Development (acting as the council's general secretary), governors and local council presidents serve in the Council. The Prime Minister is empowered to convene the council and to invite other ministers as he deems necessary according to the agenda (Article 5). The second body is the Ministry of Local Development. The Local Development Ministry is the main actor that ensures coordination between central government and governorships. The main responsibility of the Ministry is to ensure and audit that the activities of the governors coincide with the goals and policies of the central government. The ministry annually prepares reports on the activities of the governorships and submits these reports to the government and the parliament (Ergun, 1995: 75–79).

Besides these structures Egypt is divided into 7 economic regions with a presidential decree (no. 475) in 1977:

1. Cairo region: Cairo, Giza and Qalubiyah governorates.
2. Alexandria region: Alexandria, Beheira, Matruh governorates and the Noubariya district.
3. The Delta region: Monufiya, Gharbiya, Kafr El-Sheikh, Damietta and Dakahlia governorates.
4. The Suez Canal region: Sinai, Port Said, Ismailia, Sharkiya governorates and part of the northern Red Sea governorate.
5. Northern Upper Egypt region: Beni Suef, Menia, Fayyoub governorates and part of the northern Red Sea governorate.
6. Assiut region: Assiut and the New Valley governorates.
7. The southern Upper Egypt region: Sohag, Qena, Aswan governorates and the southern part of the Red Sea governorate.

Decentralization in Egypt is limited to a system in which local units serve administrative functions only, without any real involvement in the political

decision-making process. Central authorities “have the last word in terms of managing local affairs” exert tight control over local councils. Based upon a strong hierarchical model, the governorate popular council has control over the lower councils.

Tasks of local government units include the provision of services such as education, health, water, sewerage, cultural affairs, youth centers, provision of housing for low income, development of agriculture and distribution of basic foodstuffs. Some tasks vary according to the level of local government, such as city planning in the city scale, organization of free zones at the provincial level (Ergun, 1995).

4.2 *Budgets of Local Governments*

Generally, the revenues of local governments come from three sources: Self-incomes, income shares and center-aid. The revenues and expenditures of local governments are shown in the annual budget of the government, provision of services, revenues of local governments, local taxes, take place on their income from fees and other local activities. Revenue shares consist of shares from land and buildings, entertainment, motor vehicles, exports and imports, and shares added to taxes on Suez Canal. Central government assistance and funds are funded by the Local Services and Development Fund, the Housing Fund, the Clearing Fund, the Gasoline Fund, etc. These funds are used for local services of provinces and other local governments (Abdulrahman, 2016).

Each year, local assemblies propose to the central government’s investment budget, which is the joint responsibility of the planning offices of the local governments and the relevant organizations of the central government in that region. The recommendations collected on investments at the local level are based on the local government’s executive board, and then it is sent to the upper level in the management hierarchy and eventually comes to the Planning Commission of the Planning Ministry, where it comes from the Council of Ministers and the national council. The Planning Ministry controls the distribution of investment funds through the Investment Bank (Ergun, 1995). The local administrations take approximately 14–15% of the annual state budget.

As Egypt’s political structure presents an unusual appearance from the past to the present, radical reforms have to be carried out, especially in local governments, in order to limit the central power and to close the distance between the state and the people. Local governments have a great deal of emphasis as a critical center of contact between the state and the people because they are the authorized units offering public services to the public such as security, waste collection, street lighting and maintenance, traffic control and fire brigade. In Egypt, the local government reform has the terms of the realization has a great importance. The current situation in local government has a critical role in corruption. It is also one of the basic parameters of

the deep state. The realization of reform and decentralization in local governments will have a positive impact on the quality of governance, democracy and public services (Abdulrahman, 2016).

Central administration has a heavy tutelage control over local governments. In recent years, local governments have been given more duties and responsibilities, but not enough sources of income. For this reason, local governments are largely dependent on central funds which place a significant limitation on their activities (Kassem, 2014).

There is a lack of coordination between the services performed by the local authorities and the services performed by the units of the central administration in that region. The officers of the central government agencies serving at the provincial level are responsible to the center and take orders from the center. At the head of the executive branch of local governments are officials who are appointed to the central government and are officers. These officials can always be appointed to other administrations. An important consequence of this situation is that it destroys the continuity in services. The average mandate of governors in a province does not exceed 2 years (Kassem, 2014: 10).

In Egypt, in recent years, significant investments have been made by the central government in the field of local governments by providing international technical assistance. Approximately 5,000 “local community services projects” are carried out by the Local Development Program and the provinces through the provinces and these projects have been continuing since 1980. Second stage studies will focus on basic infrastructure and more resources for local development. In Egypt, there are significant changes in the strengthening of local governments, the increase of authority and resources (Kassem, 2014: 13).

5 PUBLIC PERSONAL SYSTEM

A close look into Egypt’s administrative machinery requires a description of employees’ status, known as the civil service, the public sector and monitoring bodies.

Those working in the administrative structure are generally referred to as public service. Egypt’s first civil service structure was established under the name “Employee Diwan.” Law No. 10 of 1951 is the first law enacted in Egypt regarding workers. The law regulating the current situation is the Law no 47 of 1978.

Regulations on appointments are set out in Article 13 of the Civil Service Law published in March 2015. The recommendations of the President or the delegates are based on merit and competence in appointments. Article 15 contains the conditions for appointment to any state office. Among these conditions, the phrase “The person has a good character, has a good reputation” draws attention. As it can be understood from the conditions the rules are not very objective. There are subjective statements, such as having a good

character. When we think the date of the law we can interpret the code easier. After the military coup army identified millions of opponents as terrorists and the civic code is written against them not to take any position in government.

With the law numbered 5 of 1991, appointment and terms of office related to key positions in the state administration and public sector were determined. Law orders the personnel department of each ministry, department or public sector unit to establish a permanent commission to identify vacancies in high-level positions. The commission has to announce the conditions through a recognized newspaper in order to make applications regarding the vacant positions. Candidates must apply with a document containing their qualifications and experience and must also attend an interview with the committee. The term of office for each position is 3 years and an applicant can only serve 2 terms in the same position. On the other hand, these provisions of Law No. 5 do not apply to purchases made for judiciary, universities, science and education research centers, police, diplomatic and consular services, Central Accounting Institution, Administrative Control Organization and Intelligence Services (Act no 5, 1991).

People raised or chosen for the top grade management positions, like District Manager or First Undersecretary, should take the lessons of leadership at the new-built training center. Some of them could send to foreign countries for taking lessons and investigation works by the agreement with benefactor agencies. Technical lesson is directed by the related department of their personal competent authority like the situation of Ministry of Interior, Foreign Affairs and Defense.

The main problems of Egypt's public service are the inflated bureaucracy. As a result of Nasser's policy of guaranteed employment for university graduates and free access to education for all, Egypt currently has a bureaucracy of more than 6 million employees, and the ratio of employees to citizens is approximately 1:17. In the 2013/2014 session, the budget allocated to public personnel payments is approximately 172.2 billion Egyptian pounds, or about a quarter of the national budget. As a result, Egypt now has an over-inflated bureaucracy that consumes more than 25% of public spending. The fact that the reduction of government employment is a political risk for the government is one of the obstacles to tackling this problem (BTI, 2012; Gallup, 2012).

The public promotion system is based on seniority rather than performance (Metz, 1990). The regulation which makes it almost impossible to dismiss a public official and the risk of reducing government employment is the main problem in this field. This situation also causes a decrease of the work performance in the public sector (BTI, 2012).

In this context, the Egyptian government has been trying to implement a comprehensive reform program for the last 4 years. Within the framework of reforms, institutional development, development of government services, planning in the country, establishing a national information system and developing a resource management system are aimed. The application of law provides other developments such as the modernization and reform of the internal

organizations. The application of the public sector employees' code of professional conduct and the achievement of improving transparency and integrity (SIS) also come into the scene within the framework of the application of law.

After the 1952 Revolution, the state took control of the economic life in the country through expropriations and public projects. A number of public institutions, such as Suez Canal Authority, Petrol Public Authority, etc. were established in this period. In 1991, a reform paved the way for the establishment of holdings that would replace public bodies. Thus, it is aimed to make control possible by providing differentiation between ownership and management.

Regarding the surveillance of administrative units, the powers used as a requirement of the brake-balance system between the powers, the authorities of local councils over the execution of local governments, the powers granted to governors in this regard, and the supervisory power of the judiciary, of course, are available. Apart from these institutions, an independent unit called "Administrative Monitoring Authority" has also been established. The main task of the unit, which is established in 1958, is to examine administrative and financial violations. Citizens can forward their complaints about work violations, law violations and mismanagement to this institution.

The process that started with the overthrow of Mubarak in Egypt caused serious political instability. This situation created an opportunity for the armed forces, which have the power to control a significant part of the economy, to expand their influence and take the country under complete control. It is a fact that in this period when human rights violations, censorship and violence are intense, security forces are out of control. It is the main problem of the country in terms of monitoring (Transparency International, 2016).

6 CIVIL SOCIETY

The historical development of civil society in Egypt parallels with management models. In the Ottoman period, charities, professional guilds and foundations played a very active role. In this period, the NGOs that are accepted as unharmful against the current political and economic order are supported. During the UK administration, new types of NGOs were established in various fields such as trade associations, cultural clubs, associations and professional organizations. The Muslim Brotherhood organization, which was established in this period, is an Islamic structure established as a reaction to the colonial rule. After the military coup of 1952, NGOs started to be oppressed in the country, especially those who were perceived as a threat to the regime, such as the Muslim Brotherhood, were banned. As a result of the effects of the liberal policies carried out in the period of Al-Sadat in the social field, new organizations such as independent unions started to be established. During the Mubarak period, civil society was not used as a means of supporting the democratization process, but as a means of ensuring that the control of the state was accepted by the people (Kaşıkçı, 2012: 19–20). The effort to

keep the civil society under control is continued by the military administration today.

There are approximately 15 thousand NGOs in the country, most of them poorly structured and small-scale, operating in many different fields. They generally have the concern of being distant from fundamentalist structures. As the same concern prevails in the state, about 61% of CSOs are affiliated with the Ministry of Social Affairs and are subject to strict control. Most of the NGOs in the society are mosque and church associations. Outside of government support, they function as social support networks. A new type of foreign-sponsored development is those focusing on human and women's rights and democratization problems (İbrahim & İbrahim, 2003: 40; Onder, 2006, 2011).

Regime pressure is an important obstacle to the development of civil society in the country, but it is not the only obstacle. The lack of a culture of coordination and cooperation between non-governmental organizations has also been another obstacle to conducting an effective activity (Onder et al., 2019). Especially the absence of a private sector large enough to support civil society has also deprived NGOs of sufficient financial support. The fact that NGOs operating in the political field prohibited by the state were not supported by the public prevented NGOs from being an element of pressure on the way to democratization (Kaşıkçı, 2012: 22–24).

Private Associations and Organizations Law lists the general principles for NGOs as follows: to serve the interests of the public, to be officially registered, to have internal statutes and to not engage in political activity for those who are not registered as a political party. NGOs are prohibited from engaging in any commercial or economic activity and receiving funds from foreign agencies without the government's permission.

Civil society organization in Egypt at three levels (UNDP—Egypt Human Development Report 2002/2003):

- The first level is the union of civil foundations and associations.
- Regional unions (26 unions) and special—qualitative unions (10) form the second level.
- There are NGOs carrying out 17 types of social activities at the third level. About $\frac{3}{4}$ of these are social aid organizations, the rest are local development foundations. The regions with the highest concentration of NGOs are respectively Cairo, Giza, Alexandria, Sharkiya and Minya governorates. Various agencies, organizations, trade unions, professional organizations and political parties are the main elements of this field (UNDP—Egypt Human Development Report [2002/2003]).

7 RECENT REFORMS

Provisions introduced with the Constitutional amendments made in 2019 are also important for public administration. The changes made by the military administration can be summarized as follows (Ugan, 2020: 187–190):

- The heads of judicial organs, related authorities and the Egyptian Chief Public Prosecutor are appointed and selected by the President. These appointments bring about questioning the impact of political or other interests on decision of the President. The high risk of influencing decisions and causing violations of authority may harm the independence of the judiciary and the rule of law.
- The phrase of “the army protects the constitution, democracy, the civil structure of the state, the gains of the people, individual rights and freedoms” was added to the article about the duty of the army. The Egyptian army, which already has a strong position in the country and has broad powers, is legally strengthened further with this additional article, the scope of military intervention has expanded and all kinds of military interventions are guaranteed by the Constitution.
- The 2014 Constitution gives comprehensive power to military courts to try civilians. However, this scope was further expanded with the Amendment. In this way, the jurisdiction of military courts was extended to include crimes committed in any public property or a vital facility. Therefore, even if there is no direct attack on the military building or military personnel, civilians may be tried by a military court.
- A Senate (Council), which will assume the role of the Council of Ministers, which is the upper wing of the parliament abolished by the 2014 Constitution, will be established next to the House of Representatives. Two-thirds of the Senate, which will consist of at least 180 members, will be elected by the people, and the remaining third will be appointed by the President. The Prime Minister, Ministers and other members of the government will not be responsible to the Senate. This will further increase the executive’s influence on the legislature.

As a result, despite the Constitution that adopts the separation of powers, it is seen that the executive has an important superiority over other organs as a result of the military administration in practice. As an important reflection of this situation, politicization in bureaucracy also takes place at the top level. Considering that merit is not prioritized in a government dominated by ideological appointments, it will be seen that professionalism is negatively affected by this situation.

8 CONCLUSION

Egypt represents a thick dossier of analysis both for scholars and readers by considering its history and culture in addition to its strategic location throughout history. From this thick dossier, this chapter focuses on administrative culture of Egypt which can be accepted as an only “page” for study. Being the roots of administrative culture, Egypt is a critical country that must be taken into account.

Administrative history is the very first step of the Egypt’s administrative culture. With Mehmet Ali Pasha’s seeds, to today’s Egypt, administrative culture is developed in a different way from the other countries in the region. Having the centralized government with military domination brings about problematic structure for local governments in Egypt. In other words, politicization of bureaucracy must be underlined as a causal effect on the non-development of local governments in addition to NGOs. The impact of the military on Egypt is also observed on legal structure. After the military coup, 2014 constitution is written. The government structure of Egypt is parliamentary with strong hierarchy (Table 1).

Table 1 Public administration system in Egypt

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Administrative history	Geopolitical situation	Strategic
	Colonial history	Yes (1822–1912)
	Legacy of bureaucracy	Yes (Empire)
	Centralized bureaucracy	Strong
	Role of military	Military dominant
	Political culture	Conservative
	Administrative culture	Not participative
	Professionalism	Moderate
	Politicization of bureaucracy	High
	Dominant state ideology	Religious
Legal structure	Nature of constitution	Written
	Origin of constitution	2014 & after military coup
	Strong constitution	Yes
	Constitutional rigidity	Yes
	Created by	military
	Revised by bureaucracy	military
	Administrative judiciary	Strong
	System	

(continued)

Table 1 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Central government	State structure	Unitary
	Government structure	Semi-Presidential
	Hierarchical structure	Strong
	Local extension agencies	too many
	Central government	Yes & strong
	Coordinating mechanisms	Existence of coordinating internal and external structure/agencies strong
	Transparent financing system	Weak
	Monitoring	Weak
	Independent regulatory Agencies	Not exist
	Local governments	Financial autonomy
Political autonomy		Weak
Council types		Council mayor/council manager
Mayors		Appointed
Decision-making bodies		Exist The local council and the executive council
Central tutelage/monitoring		Exist & strong
Subsidiarity principle		Exist
Decentralization type		Devolution
Intergovernmental relations	Logic for Division of tasks	Political
	Tutelage/monitoring	Strong
	Communication	Strong Formal
Public personnel system	Civil services	Career based Prestigious
	Scope of civil services	%of civil services
	Recruitment and promotion	Competitive/not competitive not political/political fair/not fair
	Nationwide exam	does not exist
	Politicization in general	strong
	Unionization	Weak
CSOs/civil society	Size of Civil Society	NGO membership, volunteering rates, % of GDP, employment
	Institutionalization	Weak
	Partnership with the state	Weak
	Political pressure/domination	strong
	Major financial revenues	Membership fees
	Supportive national culture	moderate

(continued)

Table 1 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Reform philosophy	Political regime & civil society relations	Weak
	Civil society	Not Prestigious
	Dominant reform paradigm	Governance reforms
	Policy Transfer	Policy adaptation/policy adoption
	E-government reforms	not completed
	Artificial intelligence (AI) reforms	partial exist
	Influence of international actors	...
	New reforms (5 years)	...

Source: Adapted and developed from Önder, M. & Zengin Ü. N. (2022). A Framework for Comparative Analysis: Public Administration Across the Globe. In *The Palgrave Handbook of Comparative Public Administration: Concepts and Cases* (Editors: Onder M., Nyadera I.N. & Islam, M.N.), Springer Nature Palgrave Macmillan: New York

APPENDIX

Rudiments about Egypt

Capital:	Cairo
Language:	Arabic
Area:	1,001,450 km ²
Population:	106,437,241 (July 2021 est.)
Currency:	Egyptian pounds
Continent:	Africa
President:	Abdelfattah ELSISI (since 8 June 2014)
Prime Minister:	Mostafa MADBOULY (since 7 June 2018)
State regulation:	Unitary
Political system:	Presidential Republic
Executive power:	President & Prime Minister
Legislature:	Bicameral Parliament consists of:
Judiciary:	Senate (Majlis Al-Shiyoukh) and House of Representatives (Majlis Al-Nowaab)
	Heads of judiciary authorities and courts, the prosecutor general and the head of the Supreme Constitutional Court are appointed by President since 2019 amendments
Constitution:	Approved by 2014
Administrative division:	27 governorates

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The Federal Republic of Nigeria

Mohamed Salah Ahmed and Hussaini Sani Yashe

I INTRODUCTION

The Nigerian public administration has undergone several changes over the years. The decades of military rule, weak institutions, and lack of transparency by some government officials have largely hampered the socio-economic development of the country. After the emergence of civilian government in 1999, the country posted a new step in affirming its political stability, reinforcing democratic practice and, confronting corruption in public sector.

In functional principles for the administrative system, many developing countries are contending for public administration reforms and executing principles of good governance in public services. For many years, Nigeria has been operating federal system of governance. The federal government of Nigeria has been tackling the implementation of the governance reforms.

Even though the governance reforms have not worked well for entire public institutions in Nigeria, it is important to realize that, reformation in the public institutions of Nigeria is underway, deregulation of civil service, banking, privatization, and budget reforms among others has been successfully undertaken by the government.

Nigeria is a very vital country in Africa and one of the world's most diverse country. In many cases, there is difficulty in understanding the concept of

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public administration in Nigeria; for that reason, the study of the administrative structure of Nigeria is crucial and unique compared to other African countries. Another key point is that Nigeria's democracy is still relatively in the early stage, although, the recent elections in the current democratic dispensation indicated a significant step in Nigeria's democratic consolidation. The country has witness various reforms in electoral process after the return to democratic system of governance in 1999 (Orwa, 2013).

Nigeria is the most populous country on the African continent. Obviously, the country is an evolving West African country which experienced periods of political crisis, corruption, and maladministration in governance. These problems can be mainly attributed to weak governance. Colonial legacy and long period of military rule largely shaped the practice of public administration practice in Nigeria.

The British colonial public administration managed Nigeria as its colonial territory from 1861 to 1954. The public sector in Nigeria was greatly influenced by the British in terms of structure, tradition, and procedures among others. The public service system of the newly created regional governments in 1954 before independence in 1960 was an imitation of the British system. There were total of four public services, the federal public service and public services of the three regional governments. The first reform was in 1946 by Harragin Commission which separated the civil service into Junior and Senior cadres. Secondly, the Gorsuch Commission in 1954' which restructured the service into five divisions namely, the sub-clerical, clerical, sub-professional/technical, administrative/professional, and super-scale. The next reform was the Mbanefo Commission of 1959 whose major focus was wage increment. Immediately after that, the Hewn Commission of 1960 which merged departments previously headed by Directors into Ministries to be headed by Permanent Secretaries. The next reforms mainly look at wage increment were carried out by Morgan Commission, Elliot Grading Team, and Adebo Commission in 1963, 1966, and 1970, respectively. Confronted with issues of performance, inefficiency, and lack of progress in the public service after the civil war of 1970, the then head of state set up Udoji Commission to among other things review wages, organization, structure, and management of the service. The result was harmonization and unification of the civil service structure. The implication was that, all condition of service such as recruitment, discipline and promotion will be same all over the country. In 1975, there was a massive downsizing based on Public Service Commission recommendation. The Philips Civil Service Review Panel of 1988 was mainly in tune with Structural Adjustment Programme (SAP). This further led to change in name of heads of ministries from Permanent Secretaries (PS) to Directors General (DG) and introduced specializations for officers. The next reform was carried out by the Ayida Panel in 1995; the panel mainly reviews the reforms of 1988, the reform reverted back the name of head of Ministry's from Directors General (DG) to Permanent Secretaries (PS). The reform further introduced measures to improve efficiency and discipline in the service. Since the return

to democratic rule in 1999, the reforms in the new millennia are mainly NPM like reforms. The Bureau for Public Service Reform (BPSR) was established. The reform entails agentification, downsizing, privatization, organizational restructuring, performance management, and improvement of service delivery. Over the years, there have been turning points in the intergovernmental relations among the higher and lower level of governments, precisely the federal government, and the then regional governments. The relation is characterized by overwhelming military influence. Fiscal autonomy was granted to the regional governments before independence in 1954. The three regions of the North, South, and East were granted fiscal autonomy over expenditure decisions and local revenue. Khemani (2001) recounted that, the fiscal autonomy over expenditure decisions and local revenue granted the three regions consist primarily of mining rents, personal income tax, and receipts from licenses. The revenue collected by the federal government was shared among the three regions based on the derivation principle. These revenues were mainly from export, import, and excise duties. However, for the purpose of promoting national unity and integration, the derivation principle was changed after independence in 1960. Citing the main reasons of issues of corruption, conflicts in regional elections and dominance of some regions at the federal government, the military truncated the democratic government in 1966. The military subsequently created more states to replace the existing regions in 1967. Most of the states were mostly created based on political and ethnic considerations. Local governments were recognized as a third tier of government in 1976. The long spell of military regimes saw the rapid increase in the creation of states by the military. The number of states rose from 12 in 1967 to 36 in 1999; local governments grew to 774 in 1999. It is clear that, the creation of states and local governments were a direct legacy of the successive military regimes, rather than deliberate reform to facilitate development. The states and local governments became entitle to allocations from both higher level of government, precisely the federal government. Freinkman (2007) argued that, the states and local governments in Nigeria were mainly created with the aim of distributing national resources by the federal government rather than improving service delivery. Further, Adamolekun, and Ayo (1989) pointed out that, public administration was characterized by military dominance and sharing of revenue from the federal government to the lower levels of government. Since the establishment of democratic system of governance in 1999, there has been lots of clamoring by the lower levels of government for more constitutional reforms that will improve administrative and fiscal autonomy. Most of the functions of the upper and lower levels of government are not clearly stated. Oluwole pointed out that, the intergovernmental arrangements have been marred with issues of structural and operational conflicts. Therefore, there is vagueness and lack of clear definition of roles in functional and fiscal intergovernmental relations among the different levels of government; there are quite number of functions which are stated as shared responsibility between

the federal, states, and local governments. For example, education and agriculture are set of two policy fields that involve the federal, state, and local governments. Intergovernmental relation is greatly influenced by the military influence, especially with the oil boom in the 1970s. The creation of the states was mostly geared toward the sharing of revenue from the federal government to the lower levels of government. Similarly, the intergovernmental relation between the states and local governments is characterized by state dominance. The constitution confers states both administrative and fiscal powers over local governments, the states has the power to alter the structure of local governments, for example, the states can create addition local units. In terms of fiscal relations, the states governments are dominant over local governments.

Nigeria population is currently estimated at about 200 Million, with a comparison to the world number seven. As well as Africa's most populated country, it comprises more than 250 ethnic groups. Identically, in Nigeria there are seven major ethnic groups: Hausa and the Fulani 29%, Yoruba 21%, Igbo (Ibo) 18%, Ijaw 10%, Kanuri 4%, Ibibio 3.5%, Tiv 2.5%. The major languages English (official language), Hausa, Yoruba, Igbo (Ibo), Fulani, and over 500 additional indigenous languages. Major faiths (religions) practiced in Nigeria are Islam, Christianity, and traditional beliefs.

1.1 Socio-Economic Development¹

According to the World Bank (2017), Nigeria has taken crucial steps for social-economic improvement for the past 15 years. From 2005 to 2015, Nigeria's Human Development Index(HDI) value was raised in 13.1%. However, the country has been facing some challenges in its quest for national developmental which entails the diminishing demand for petroleum and the changing economic system which pose a threat in the quest for development. Other problems are establishing stable and strong government institutions, weak financial management, low human development, and improving the livelihood of rural people.

The gap among citizens concerning opportunities and earning income was spread swiftly and has aggravated the level of hardship. Furthermore, socio-economic problems and inequality are the major cause of political crises in the country (World Bank, 2017).

1.2 Constitutional Framework

In 1960, Nigeria emerged as an independent nation. The first republic of Nigeria adopted a modern constitution that was a result of constitutional consultations of 1957 and 1958. It was created as a federal state with the parliamentary system of government in Nigeria. In addition to that, in 1963 the House of Representatives rectified the constitution and announced the first

¹ Retrieved from: <https://www.cia.gov>, Accessed on May 05, 2018.

republic of Nigeria (1960–1966). The first military coup in Nigeria occurred in (1966–1979). Nigeria had four written constitution that was declared by the colonial administration and after colonial period the state had applied other five constitutions mostly drafted by the military (Kew and Lewis, 2010, 369).

1.2.1 Impact of Military and Civilian Administration on the Constitution

As a consequence of the coup, the country's constitution was expelled and the country was ordered on the command of the military regime. The reasons stated by the military for coup was that, there was instability, nepotism, and corruption in the then civil administration. Many community chiefs and political leaders including the Prime Minister Tafawa-Balewa were assassinated during the coup. As a result of the coup, Nigeria again tried to reform civilian government, notably, former Nigerian president Olusegun Obasanjo was instrumental in the establishment of democratic change in Nigeria, and the military government was abolished in 1979. Nigeria returned to democratic governance in 1979 which led to the second republic of Nigeria 1979–1983 (Gupta, 2014: 8), and a new constitution was drafted. Four years later, immediately after the second election in 1984, another military coup truncated the civilian administration and seized power, followed by another military to military coup in the following year of 1985. Consequently, bloodless coup took power again in 1993 with the claim to maintain common interest. Following the adoption of new transition agenda, power was transferred to the civilian administration in May 1999 (Gupta, 2014: 11).

1.2.2 The Fourth Republic (1999–Current)

With the election of President Olusegun Obasanjo on May 29, 1999, Nigeria returns to democratic system of governance. The political build-up of the nation is commonly attributed to a change process managed by the military regime to bring back the civilian rule. The current constitution holds the federal form of government, with three levels of government, comprising federal, states, and local levels, in a presidential form of government. Nigeria has conducted four universal elections with accompanying three Presidents and several elections concerning federal and state chamber (Gupta, 2014: 12). The constitution adopted presidential system of government, bicameral legislature and elected governors for the 36 federating units. However, the constitution is still considered as largely a military legacy.

2 ADMINISTRATIVE HISTORY OF NIGERIA

The colonizers initially divided Nigeria into three separate divisions, later decreased to two parts in 1906, Southern and Northern Nigeria. In Southern Nigeria, long-term relations with Europe had developed enlightened African entrepreneurial and trained professionals in Lagos city, along with booming international trade that facilitated the development of business, railways, and

administration in the interior. The development of a Legislative Council and dissemination of British rule under the leadership of a high Court demonstrated a movement to substantial modernization. (Ballard, 1971: 334).

Lugard personally, has been acting as Governor General of Nigeria in 1912, described the different policies of the two parts: that of Northern Nigeria may be characterized for an inherent policy whose goals was mainly administrative, whereas Southern Nigeria was trade and aim mainly to the development of natural resources and business (Ballard, 1971: 335). Contemporary Nigeria is absolutely a uniqueness of non-independent period.

2.1 *Roots and Development of Administrative Tradition*

Before the arrival of western powers on the coastline of West Africa as colonial administrators, there had been traditional political structure in a numerous section of Nigeria. Several ethnic nationalities of Nigeria preserved distinct and sovereign structure of administration before the development of contemporary country structure.

Through the era, there were numerous structured political organizations in Nigeria. It is notable to examine political formation of the Igbo, Yoruba, and Hausa–Fulani groups of Nigeria. First, the Yoruba Empire was headed by the Oba town, and they were led by ancient Yoruba Ife who was the religious pioneer of the community. The system of rule in the traditional Yoruba community was through the king, and there was considerable delegation in the system of administration. Second, The Igbo community was autonomous and democratic, egalitarian structure of administration existed in the community. Normally, they have no rules or supreme leaders and hence, their structure was politicians and they were preserving a distributed power—head community (Kew and Lewis, 2010: 368).

Third, the Hausa in the northern region was formed of fourteen cities gathered into two. The first group of 7 was named Hausa Bakwai, and another group of 7 was named BanzaBakwai. Completely, the Fulani accepted the governmental leadership or (political) of the Hausa or Habe political entity or states at the beginning of the nineteenth century. The modern state of Nigeria, nevertheless, similar to almost other modern countries in Africa, is not equal to a hundred years. Creation of the states is embedded in the colonial experience of the area.

The resolution for the establishment of Nigeria formally started in 1861 with the formation of the colony of Lagos. A different Governor selected in 1886 for the settlement of Lagos. In 1884–85, Berlin Conference was agreed for Britain to have a free hand from other western countries that compete in the land of Nigeria, Gambia and Sierra—Leone, Gold Coast in Western Africa. Hence, Britain begun serious attempt to colonize Nigeria and to accomplish this adjective they come up with new system of (indirect rule) in the northern region where organized kingship prevailed.

The influence of colonialism played huge tribe and community separation to maintain modern Nigerian and to arrange political position to the colonial order (Kew and Lewis, 2010, 369). In other words, completely political borderlines of developing Nigeria got the structure in January 1914. Contemporary Nigeria is absolutely an effect of monarchical inspiration. Before the entrance of colonial administrators, Nigeria as an entity didn't feel the fact of being a nation in the modern borderlines of the state. Alternatively, there had been several tribal associations with different forms of governance.

2.2 *Emergence and Development of Bureaucracy in Nigeria*

During the Colonial administration in Nigeria, the formation of public agencies, in particular, police forces, Judicial department, jails, constructions, Posts, Customs duty, and communication, maritime and Mines which was marked in 1906 proved to be colonial civil service achievements and another bureaucratic improvement in the colonial administration of Nigeria.

However, after the country attained its independence on October 1, 1960, things were transformed. The post-Colonial administration era perceived "the transformation and redefinition of the role of the civil service to that of nation-building that is assisting the new government to plan and accelerate the pace of Nigeria's socio-economic development" (Okotoni, 2003).

In 1966, the first republic of Nigeria was truncated by the military which saw the politicization of administration. The highest civil service positions were directly supposed political duties. That era led to the emergence of top civil servants, characterized as Supper Permanent Secretaries They enrich top influential "political elite," especially in the middle of 1970 to 1975. Later on, the role of the bureaucracy in Nigeria was considered to perform the role of formulation and implementation of government policies, coordination of federal ministries, advising the political leaders, collecting, analyzing, and supplying of data for policy making, assuring the integrity of public services and relations (Okotoni, 2003: 3).

As Akinwale studies, the government also was characterized by ethnic regionalism between the Southwest, East, and the North. Bureaucratic differences between the triplet regions set the foundation for employment policies from colonial to post-colonial administrative time (Akinwale, 2014: 2). Nigeria's Public bureaucracy was the colony formation and a copy of the British civil bureaucracy with regard to structural features. Because of the fact that Nigeria was unable to develop its separate system similar to China, and Greece, Nigeria accepted the British pattern. The key objective of British bureaucracy in the country was to support principles of law and order, to make sure citizens pay taxes on a regular basis, and loyalty to the British kingdom. Safeguarding that raw material required for British manufacturing industries and then the finished goods were sent back to the colonies for consumption. (Ajibade & Ibietan 2016: 9).

3 CENTRAL GOVERNMENT OF NIGERIA

Nigeria formally endorsed a federal system in 1954 ensued from a common consent agreed by the British colonialist and Nigeria's nationalist leaders. For considering that system was appropriate governance system that could fit its varied linguistic, ethnic, religious, and regional associations and interest groups. Nigerian people were merged into a single political-administrative body. More importantly, the constitutional provisions of a federal structure commonly accepts the model in which governmental powers are divided among central government and a varied set of sub-national governances, which highlights the independence and freedom of each kind of sub-national government (Adamolekun & Ayo, 1989: 1).

In October 1975, the federal republic of Nigeria adopted the presidential system. The legislative body of the country was bicameral National Assembly and state assemblies for the sub-national governments of the federation. The federal capital territory is under leadership of the National Assembly. The general elections of national assembly are held every four years. The federal member states were allocated three seats in the upper parliament, excluding the federal capital of Abuja with one seat and considered as one district. In principle, the entire allocated seats in the House of Representatives was based on the population size. Each constituency is represented by one legislative member in the House of Representatives. The members of the House of Representatives are directly elected by the people and each citizen aged 18 years may register to vote.

Moreover, the necessity for further qualification of the person who competes for a seat in the National Assembly must be affiliated with a political party and must be backed or promoted through that political party. The country still does not consent independent candidateship.

According to federal constitution adopted in 1999, in Sect. 5 clause (1), the Executive powers of the federal republic of Nigeria are granted to the President of Nigeria and empowered to appoint and remove the Cabinet Ministers to support him; the president has executive powers to nominate suitable persons in the cabinets, commissions and Propose National budget, and introduce the budget to the National Assembly for approval; and decide the functional deployment of the national Armed Forces of the federation, including appointment and removal of the commanders of Armed Forces.

Moreover, the president have other major powers which includes (foreign polices and signing international treaties and make decisions, accept census, declare war and state of emergency, and signing of bilateral and multilateral treaties on behalf of the Federal Republic of Nigeria; the president also have the power to regulate the acquisition, and loss of citizenship (Constitution, 1999).

As for the Judiciary function, the federal republic of Nigerian constitution makes providing for the division of authority with the adequate portion of

'check and balance'. Judiciary is a distinct body of the government. Judicial arm is independent and responsible to review and interpret laws. At the highest-level courts includes, the Supreme Court of Nigeria, the Court of Appeal, the Federal High Court, and the National Industrial Court. The Judiciary is led by the Chief Justice, while the Legislature and the Judiciary at the federal-State level are led by the Speaker and the Chief Judge, respectively.

The National Judicial Council is established through integrity of clause 153 of the 1999 Constitution to protect the justice from the impulse and inconsistency of the government. The Judicial Council was established and granted with various authority and purpose. The Judiciary has authority to examine the laws of the parliament and the executive as well as to clarify the acts.

Federal High Courts and state High Courts have separate primary control through basic individual entitlement provided by the Constitution (Nigerian Constitution, 1999).

3.1 *Scope of Central Government*

The federal government of Nigeria is the federal government of the federal republic of Nigeria. The government is responsible in the following areas such as Defense, National statistical system, labor rules, telecommunications, minerals and Mines, insurance, Social Security, and education standards, Shipping; Federal trunk roads, water resources involving more than one state, Railways, aviation, Posts, telegraphs, Police and other security forces, interstate business, National Parks (Khemani, 2001: 4) (Table 1).

3.2 *Federal Ministries*

The cabinet ministers of Nigeria are the executive arm of the government of Nigeria and appointed by the president and report to the president. Currently, there are 28 ministries in the federal government of Nigeria, but the president of the federal republic of Nigeria is in charge of the federal ministry of petroleum.

Here, once again check the chronology and structure. Please refer to the outline on how to tailor the flow of discussing the central government (Table 2).

There about 42 independent agencies currently existence in Nigeria. According to federal constitution in Sect. 5 clause (1) the Executive powers of the federal republic of Nigeria are granted to the President of Nigeria and empowered to nominate the heads of several independent Commissions and agencies. Each commission is responsible to implement certain policies and law that was enacted by the parliament.

Table 1 List of Ministers of Federal Government of Nigeria

<i>No</i>	<i>Ministries</i>				
1	M.o. Labour & Employment	13	M.o. Sports and Youth Development	25	M.o. Works and Housing
2	M.o. Mines and Steel Development	14	M.o. Petroleum Resources	26	M.o. Special Duties and International Affairs
3	M.o. Transportation	15	M.o. Health	27	M.o. Federal Capital Territory
4	M.o. Power	16	M.o. Agriculture and Rural Development	28	M.o. Budget and National Planning
5	M.o. Interior	17	M.o. Humanitarian Affairs, Disaster Mgt. and Social Development		
6	M.o. Women Affairs	18	M. o. of Information and Culture		
7	M.o. Science and Technology	19	M.o. Environment		
8	M.o. Finance Budget and National Planning	20	M.o. Defence		
9	M.o. Justice	21	M.o. Foreign Affairs		
10	M.o. Aviation	22	M.o. Niger Delta		
11	M.o. Communication and Digital Economy	23	M.o. Police Affairs		
12	M.o. Water Resources	24	M.o. Industry, Trade and Investment		

Note President MuhammaduBuhari is also Minister of Petroleum. Retrieved from: www.premiumtimesng.com list of Buhari's ministers and their portfolios published on August 21, 2019, Accessed on February 27, 2021

Source Table 1 describes the federal government ministries, from nigeriagalleria.com 2017, Note: Ministry of petroleum entitled the President of the Federal Republic of Nigeria

3.3 *Financing*

The Federal Government derives its revenue from different sources. The Federal Government Revenues are kept in the Consolidated Revenue Fund.

3.3.1 *Amalgamation or Federation Account Revenue Units*

The Federal government Account was created by the 19,999 Constitution. Section 162 of the constitution, the federation account is one into which is paid all revenue collected by the government of the federation, except the proceeds of the PAYE of the personnel of the armed forces of the federation, the Nigerian Police, Foreign Service Officers and the Residents of the Federal Capital Territory. Sources of revenue payable to the Federation Account are; Direct Taxes, Indirect Taxes and Mining (Table 3).

Table 2 Independent agencies

<i>No</i>	<i>Name</i>	<i>List of Independent & Regulatory Government Agencies in Nigeria</i>			
1	Budget Office, Federal Ministry of Fin	14	Independent National Electoral Commission (INEC)	29	Nigeria Investment Promotion Commission (NIPC)
2	Bureau of Public Enterprises (BPE)	16	Industrial Training Fund	30	Nigeria National Petroleum Corporation
3	Central Bank of Nigeria (CBN)	17	National Agency for Food and Drug Administration and Control (NAFDAC)	31	Nigeria Postal Services
4	Corporate Affairs Commission (CAC)	18	National Bureau of Statistics (NBS)	32	Nigeria Stock Exchange
5	Debt Management Office	19	National Council on Privatization (NCP)	33	Nigerian Air force
6	Department of Petroleum Resources (DPR)	20	National Economic Empowerment & Development Strategy (NEEDS)	34	Nigerian Army
7	Economic and Financial Crimes Commission (EFCC)	21	National Examination Council - NECO	35	Nigerian Communications Commission (NCC)
8	ECOWAS	22	National Health Insurance Scheme (NHIS)	36	Nigerian LNG
9	Federal Aviation Authority of Nigeria (FAAN)	23	National Orientation Agency (NOA)	37	Nigerian National Assembly
10	Federal Housing Authority (FHA)	24	National Planning Commission (NPC)	38	Nigerian Police
11	Federal Inland Revenue Service (FIRS)	25	National Poverty Eradication Programme (NEPAP)	39	Nigerian Television Authority (NTA)
12	Independent Corrupt Practices & Other Related Offences	26	Nigeria Deposit Insurance Corporation (NDIC)	40	Power Holding Company of Nigeria (PHC)
13	Security and Exchange Commission (SEC)	27	ServiCom	41	The New Partnership for Africa's Development (NEPAD)
14	The Nigeria Export Processing Zones Authority	28	The Standards Organization of Nigeria (SON)	42	West Africa Examination Council (WAEC)

Source Table 2 shows Nigerian independent agencies, nearly 42 independent agencies currently exist in Nigeria d from: nairametrics.com 2013

Table 3 Revenue distribution formula

S/N	Category	Year	Year	Year	Year
		2010 (%)	2011 (%)	2013 (%)	2014 (%)
1	Federal Government of Nigeria	55	55	55	55
2	Federal States	32.5	32.5	32.5	32.5
3	Local Government	10	10	10	10
4	Amelioration of Ecological Disasters and Producing areas	2.5	2.5	2.5	2.5

Sources Table 3 illustrates the Method of sharing revenues among the levels of government in Nigeria and the amount allocated each level (Daniel, 2013)

3.3.2 Federal Government Account: Consolidated Revenue Fund

The Consolidated Revenue fund was created through Sect. 80 of the federal constitution adopted in 1999. It stipulates that except those revenue items which are specifically designated to other funds, all others shall be paid into the consolidated revenue fund.

4 LOCAL GOVERNMENT OF NIGERIA

The federal republic of Nigeria comprised three levels of government: Federal Government, State, and local government. However, the Local administrations are formed by state legislation with the approval of the National Assembly which comprises the House of representative and the Senate. The entire local governments are sole-tier and have no distinction within urban, rural, or municipal councils. Even though the local administration is protected by the federal constitution, the election in local governments is missing in about half the federal states (CLGF, 2008).

At the state level, the related ministry of local government and Tribal chief affairs, or Agency of local government affairs, is accountable for the administering local authorities at the state level. Local administration represents a sole level over entire states. There is about 768 local government authorities and six area councils, aggregating 774 authorities across the country.

The evolvement of local government system in Nigeria could be marked to the Native Authority Ordinance of 1916 that passed through the British colonial administration apparently to influence the prevailing traditional government systems in the diverse regions of Nigeria. The first law has legal framework to fictionalize a system of indirect administration (Ikeanyibe, 2009).

Nevertheless, the system approached to consolidate the system of local government encountered opposition from the West and East regions. The two regions perceived that the system was not suitable for their existing traditional administrative systems. Even so, the statute preserved up to 1946, while the Richard constitution initiated the modern regional assemblies. In 1949, the

Eastern house of assembly granted a forum for discussion, which ultimately guided to the Local Government Ordinance of 1950 that fixed the landscape to a democratic system of local government (Ogunna, 1996). Besides, in 1976 reform for Local Government mark the historical improvement of local government system in Nigeria. The reform was design and contributed to a general national local government administration in Nigeria. However, Current Nigeria's Federal constitution adopted in 1999, in its fourth schedule, division 7(2), fixed out the functions of local administration.

4.1 *Scope of Local Government*

In principle, the local government is a division of government therewith described authority and powers, and relevant independence. The constitution provides the following functions to the local government such as providing and rehabilitation of public health services; natural resource development and agriculture; providing and rehabilitation for the public (Primary schools) and vocational training education, and other relevant functions that might be assigned on it through the state house of assembly. Section 7(1) as well pledges democratically elected administration in Nigeria.

The local government council has fundamental powers to manage their local affairs including staff, administration, and financial management to establish and control the providing of services and to specify and execute programs, projects in an effort to counterpart the activities of the state and federal government level (Abdulhamidand & Chima, 2015).

4.2 *Local Administration Unit*

As an illustration every federal member state have endorsed its separate legislation, whereas the main functions of local administration are described in the federal constitution, single states may extend their duties through legislation. There are about 768 local government authorities in the country and six area councils, totaling 774 authorities (Table 4).

4.2.1 *Administrative Structure of Local Government in Nigeria*

The Structure of local government administration in Nigeria entails the Executive Arm, which comprises of the Chairman, Vice Chairman, Executive Committee, Supervisors, and Secretary. In particular, The Chairman executes the responsibilities of an approval for the financial transaction (Fig. 1).

Legislative branch comprises of a leader, his deputy, and councilors. All board members emerge through election process and in that case the Leader and deputies are selected between them. On the other hand, Delegates of the legislature meet for these routine responsibilities: rectify and endorse the annual budget of local government. The chairman has power to refuse (veto power) that could be nullified through 2/3 of the members of local government council (CLGF, 2008).

Table 4 Division of local councils and population

S/N	State	Local governments	S/N	State	Local governments
1	Abia	17	20	Kano	44
2	Abuja (FCT)*	6	21	Katsina	34
3	Adamawa	21	22	Kebbi	21
4	AkwaIbom	31	23	Kogi	21
5	Anambra	21	24	Kwara	16
6	Bauchi	20	25	Lagos	20
7	Bayelsa	8	26	Nassarawa	13
8	Benue	23	27	Niger	25
9	Borno	27	28	Ogun	20
10	Cross River	18	29	Ondo	18
11	Delta	25	30	Osun	30
12	Ebonyi	13	31	Oyo	33
13	Edo	18	32	Plateau	17
14	Ekiti	16	33	Rivers	23
15	Enugu	17	34	Sokoto	23
16	Gombe	11		Taraba	16
17	Imo	27	35	Yobe	17
18	Jigawa	27	36	Zamfara	14
19	Kaduna	23		Total: 37	774

Source from (CLGF, 2008), Table 4, shows the division of councils. Kano state is the dominant one it holds about 44 local governments; Abuja has 6 local governments and has the smallest number of local administrations in Nigeria

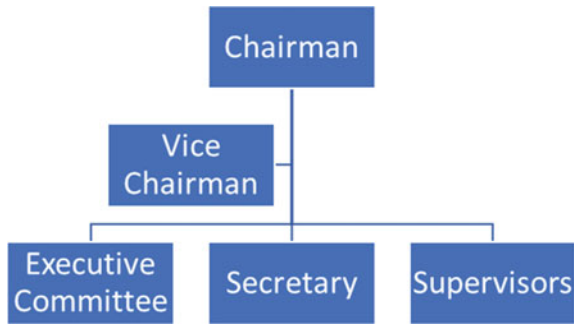


Fig. 1 Executive Branch of local Government in Nigeria (Source Figure 2 describes the Local Administrative structure in Nigeria, it has demonstrated divisions that reveals the effectiveness of administrative hierarchy, from the study: CLGF, 2018)

The council has the ability to oversee execution of programs projects that are contained in the annual budget. They examine the monthly financial expenditure reports and incomes supplied by the local government. Negotiate and function with the leaders of local government administration. Rules approved by local authorities are titled bye-laws, after adopting of laws by the council, the Chairman must ratify the decree in order to become valid (Ilkande, 2017).

4.2.2 *Financing Structure of Local Government*

Local administrations are responsible for collecting some local taxes, for instance, those for transportation, hunting, and local markets, in addition to commercial drivers and motor charges. In this context, the Local administrations are not allowed to fix deficit budgets. The main source of financing for local governments is allocation from the federation account based on a revenue sharing formula through the state-local government joint account.

4.2.3 *Auditing of Local Authorities*

With attention to the financial auditing, every state has its own General Auditor, every local administration must present their annual financial statement. The federal-state assemblies employ oversight role in the operations of local governments. The annual budgets of local councils are endorsed by the district officer. Local governments have to maintain appropriate accounts and make financial statements at the end of each year. They must be presented to the auditor general. The verified financial statements and audit report are then sent to the district officer. The auditor general can carry particular study or any other audit activities that is considered necessary (CLGF, 2008).

5 PUBLIC PERSONNEL SYSTEM

Though there is much discussion in this study about the development of Civil Service in Nigeria, the Nigeria's public employees are developed from the colonial period, and it was largely an instrument for administering Nigeria by the British colonizers. The amalgamation of the Southern and Northern colonies in 1914 under Frederick led to the creation of what appeared as an integrated system. The higher level of the colonial system was rooted in three powers such as legislative, executive, and judiciary, traditional leaders were also adopted in the colonial authority framework. With the adoption of federalism in 1954, all federal member states established its own civil services, and the Federal Civil Service Commission was established. After Nigeria achieved independence in 1960, the role of the civil service has changed greatly from the colonial structure of preserving stability and peacefulness to that of encouraging the realization of the country's development objectives. Thus, the civil service begins the preparation and execution of economic and social policies. With the boom of natural gas and oil revenue in the 1970s, and the country's civil war (1967–1970), there was high demand for resuscitating the economy

by the federal member states, and the Federal Civil Service. The several military interventions and their ignorance of politics particularly in the years of 1966 to 1975 led to the emergence of very powerful heads of MDA's, termed Super Permanent Secretaries. During this period, there was military dominance over the service, the military changed the structure, organization and functioning of the Service. The Federal Civil Service was prioritized over the member states Civil Services, several reforms led to the massive downsizing of the Service in which over 10,000 bureaucrats were sacked (Adeosun, 2012: 9).

The Public Service in Nigeria was created as a career system in accordance with the Weberian orthodoxy. The public service is characterized by: a chain of control, distribution of functions, professional development, and merit based.

5.1 *Overview of the Public Personnel Systems*

The National civil service of Nigeria is heavily relying on written examination for the decisions of public officers' qualification for promotion. This is in addition to the Annual Performance Evaluation Report (APER), a tool for appraising officers by their supervisors for promotion, although it constitutes only 20% out of the required score. Some investigation report alleged that some applicants paid bribe to relevant officials of the Federal Civil Service Commission in order to be promoted to higher positions. Since Nigeria became an independent state, the federal Civil Service has undertaken several reforms aimed at improvement and reforms to conform with the evolving challenges of the twenty-first century (Olushola, 2016).

5.2 *Administrative Techniques Used in Public Personnel System*

Another key point, the Civil Service is an important division of the administration and works with the government in the formulation and implementation of public policies. In Nigeria, the appointments of public officials in the Federal member State has to be approved by the State's Legislature, and draft bills consented by the Governor. Federal Civil Service is an executive arm established to perform appointments, transfers, and disciplinary control in relation to a federal government employee. Notably, federal civil service recruitment process is an open competition for all Nigerians who qualified to fill the vacancy. In addition, Public Service Institute of Nigeria is key training institution for the Public Service and plays critical role in developing skills and capacity of civil servants. The institute provides appropriate programs that form critical capacity in the public service, concentrating on the key fields of public administration and management, leadership and good governance (Abifarin & Bello, 2015: 79).

In the case of distribution of staff in public institutions, for instance, Nigeria Men and women have an equal chance in the participation of labor force, but the number of men and women employees varies. A study shows that,

men composed the mass of jobs in federal government, member states and MDA's. According to the National Bureau of Statistic of Nigeria, about 65.3% of senior positions in public service are taken by men, compared to 34.7% by women within 2010–2015, and this trend is same at the subordinate positions and across the administration, the percentage of men employed noted in that period was continuously greater than women (NBS, 2015).

5.3 *Unionization in the Public Personnel System*

The entitlement of union in the Nigeria's constitution pledges workers' liberty to establish trade associations or unions to defend their rights. The Nigeria Labor Congress serves to stand for "Blue color" employees, and the Trade Union Congress of Nigeria serves the superior (i.e., white color) employees. The Labor associations in Nigeria stay extremely energetic and are likely to carry out its functions on a normal foundation despite the domestic and state institutions.

The Trade Union Amendment Act of 2005 permitted non-managerial holding positions to join the associations. The biggest Nigeria's labor federation is Nigeria Labor Congress, comprises 42 industrial associations; the Trade Union Congress contains 18 unions (Export, 2016).

5.4 *Electronic Government E-Governance*

In western and other developed countries, the electronic government has been accepted at all areas of government operations along with guiding the economy, delivering public services. As Agunloye demonstrated, the electronic government is like intercommunication among people, private companies, and organizations, public institutions including MDA's and other tiers of the government. The concept of electronic government started in the beginning of 1990s, and its aim was for government to utilize information technology to enhance administration, improve performance and effectiveness in the distribution of public service. In 2000, the government of Nigeria acknowledged the necessity to change the public service into the modern system by using information communication technology.

Consequently, the government aims to enhance its public service delivery, ensure openness, make the government more accessible, and improve the direct dissemination of information to the public (Abdulkareem, 2015: 1).

More importantly, the electronic government aims to employ information communication technology, (ICT) within public administration through institutional change and modern tools to enhance public services democratic procedures and to facilitate the achievement of government policies (Ojeka & et. al., 2016: 133).

Over two decades the Global ranking of the United Nations between the 192-member states placed Nigeria aver 100 as 141st in 2013. According to United Nations Electronic government survey in 2012, Nigeria is less

advanced in electronic government among countries with huge population, such as India and China (United Nations, 2013).

There are some challenges for the implementation of e-government in Nigeria, and these challenges include weak information communication skills, insufficient power supply in most cities, towns, and villages, in addition, security and privacy issues (Abdulkareem, 2015: 51).

6 NON-GOVERNMENTAL ORGANIZATIONS (NGOS)

The Nigeria Network of NGOs was founded in 1992; the network represents more than 1800 organizations extending from small clusters operating at the local level, to bigger associations who are operating at the national level. The Nigeria Network of NGOs is the primary popular membership organ for civil society organizations in Nigeria which promotes powerful championing on problems of poverty and other developmental issues. Certainly, the function of the non-governmental organization in Nigeria includes rural development, promotion of Health and education, human rights advocacy, microfinance, etc. The NGOs Financial source comes mainly from membership fees, donors containing individuals. The remaining part comes from international organizations and charity organizations for program particular activities. The Nigeria Network of NGOs uses rigid financial controls and accounting standards to effectively administer whatever finance trusted to them through their partners, members, and donors (NNNGO, 2018).

A non-governmental organization is a legitimately formed organization established through legal persons which function separately from any form of government. The name was invented from the United Nations (UN) in 1945, and it is commonly employed to relate to organizations which do not belong to a government institution and not normal private (Profit) businesses. The non-governmental organization is financed entirely or partially through governments, but, NGO preserves its separate entity from government institutions and its membership. There are numerous non-governmental organizations in Nigeria that are operating to assist the public and society in need. Definitely, there has been a number of non-governmental organizations for last few years, working to raise civil society, democracy, and development in Nigeria. These NGOs required funds in order to achieve their objectives of improving lives. Sponsors globally are assisting Nigerian non-governmental organizations with their financing projects.

7 RECENT DEVELOPMENTS AFFECTING PUBLIC ADMINISTRATION STRUCTURE IN NIGERIA

It is important to realize British colonial administrative practices and rules have intensely affected the Nigerian administration system whereupon superior civil servants have been associated with public policy formulation in Nigeria. At the same time, the government reforms in Nigeria, similar to other nations across

Table 5 Series civil service reforms in Nigeria from 1960 to 2012²

S/N	Name of the reform commission /panel	Year of the reform
1	Morgan Commission	1963
2	Eldwood Commission	1966
3	Adebo Commission	1971
4	Udoji Commission	1972
5	Dotun Phillips Commission	1985
6	Decree No. 43	1988
7	Ayida Review Panel	1994
8	Civil Service reform under President Olusegun Obasanjo	1999–2007
9	Steven Oronsaye Panel	2010–2012

Note Data for the history of civil service reforms in Nigeria from (Ogunrotifa, 2012: 12–13)

Africa and outside continent had met with little achievements, considering majority features of those reforms made are usually copied from western experiences that are far separated from the inherent social condition, absent from local control system and political culture (Ogbegie, 2008: 27–29; Nyadera & Islam, 2020) (Table 5).

7.1 *Civil Service Reforms*

Table 5 shows the series civil service reforms made by the Nigerian government in last century. The massive reform was initiated by Former Nigerian President Obasanjo which led to downsizing of civil servants across government institutions. As observed by El-Rufai, some civil servants were inexperienced and less-educated. Their average years was 42 years, and above 60% were over 40 years. Fewer than 12% of the civil servants adhered to have a university degree or equivalent. Above 70% of the civil services were of the lower grades 01–06, of sub-secretarial and equal skills' (El-Rufai, 2011). The Civil Service conducted a headcount of all public employees across government institutions.

7.2 *Budget Reforms First Time*

Presidential Buhari ordered entire government budgets to be prepared in line with International Public Sector Accounting Standards by employing a budget guide made for that objective. Hence, in 2017 Budget was gathered using an online-based system for the first time ever. Over 4,000 (four thousand)

² Detailed information can be found <https://www.ippis.gov.ng/>, Accessed on April 29, 2018. Retrieved from: nigerianfact.com/federal-civil-service-commission-salary-structure-in-nigeria/Aguwa February 23, 2018. Retrieved from: www2.fundsforngos.org/upcoming-funding-opportunities-of-2018-for-ngos-in-nigeria/, Accessed on July 1, 2018

employees of the Ministry department Agencies were particularly prepared to employ the new system, over many places countrywide.

Particularly, on the financial management aspect, after the implementation of the Treasury Single Account (TSA), 17,000 business bank accounts moved to the Central Bank of Nigeria. This raised the transparency of Ministries, Departments, and Agencies cash management. The zero-based budgeting system and the Government Unified Financial Management Information System measures also enhanced the budget development and execution system. Also, the initiation of the Integrated Personnel and Payroll System assisted to eliminate ghost employees from the payroll. "Revenue generating agencies are regularly audited, with briefings to the National Economic Council. Pilot corruption risk evaluation of selected government agencies was implemented to assist target efforts to prevent and detect corruption at higher-risk agencies. Finally, to further shed light on this issue, the National Bureau of Statistics conducted a survey on corruption, laying out the incidence of bribery across different institutions" (Osezuz, & Julius 2013: 53).

7.3 *Banking Reforms*

The banking sector in Nigeria has some problems, it usually makes short-term financing rather than long-term investment in the private sector. In order to reinforce financial sector and enhance the accessibility of local credit to the private sector. Consequently, in mid-2004 banking integration was inaugurated. the central bank of Nigeria order the entire deposit banks to increase their smallest asset base from nearly US\$15 million to US\$192 million before the end of 2005. Weak Banks who failed to fit the new demands were anticipated to merge or else their permissions or licenses abolished. The implementation of the policy decreased the number of deposit banks in Nigeria from 89 to 25. Furthermore, in the procedures of gathering the recent capital demands, banks increased the corresponding of nearly \$3 billion from local capital markets and brought nearly \$652 million of Foreign Direct Investors to the banking sector in Nigerian (Iweala & Kwaako, 2007: 11).

7.4 *Privatization*

Privatization is part of alternative reforms that the Nigerian government has been pursuing; the public sector in Nigeria was a financial burden to the government. The huge government investment in publicly owned enterprise in prior years had not yielded positive result. Public owned enterprises were generally not well-managed, and there was frequented losses and needed yearly government contribution to continue its operating.

For instance, direct government financial assistant to public-owned enterprises in 2001 alone was figured around USD \$323 million with 0.68% of GDP, nearly one-half of the entire grant distributed to oil refineries and the telecommunication division.

The privatization of certain government-owned enterprises, along with free trade or deregulation of state activities in certain segments was hence required to enhance the cost-effectiveness of these enterprises, to impede corruption, in addition, to diminish the financial expenses to the federal government of Nigeria (Iweala & Kwaako, 2007: 12).

From 1999 to 2006, nearly 116 enterprises were privatized, containing a numerous loss-generating state enterprise, in particular telecommunications, aluminum, petrochemical, insurance company, and public hotels. A major element of the privatization plan was to divide some companies into separate parts, for instance, Power Holding Company of Nigeria was separated into several companies working for energy Generation, Transmission, and Distribution. On the other hand, government-owned enterprises like ports were also sold to private sector. In recent years, the government sold 51% of its share in the Hilton Hotel and Nigeria Telecom Limited (Iweala & Kwaako, 2007: 13).

On the negative side, there are various challenges faced by the implementation of the reforms such challenges occurred in physical threats to economic team members and others who participated in the reforms. (Iweala & Kwaako, 2007: 13).

7.5 *Transparency & Anti-Corruption*

Corruption by some government officials has affected the provision of public service in Nigeria. A survey conducted in 2012 shows that, some companies need to pay bribes in order to get trade authorization (see Kaufmann et al., 2005). Additionally, some Nigerian companies observed affirmed that public money was transferred to personal groups, similar to Russia and South Africa (Iweala & Kwaako, 2007: 17).

The constitution of Nigeria adopted in 1999, clearly indicates the code of conduct provisions and other ethical guides for public servants. The law bans corrupt practices and prohibits partiality.

The Financial and Economic Crimes Commission (EFFC) is mandated to investigate and prosecute financial crimes. In 2017, the commission investigated and uncovered 286 cases of financial crimes. However, it has been noted that there is insufficient evidence in most cases with little impact to the government budget and no impact on negative public opinion (Olawoyin, 2018) (Table 6).

8 CONCLUSION

In conclusion, the Nigerian's public administration is predominantly a colonial and military legacy, and the public service was established during the colonial rule and modeled after the British Civil Service. Nigeria practiced regional government immediately after independence. During the long period of military rule, the military changes the structure, organization, and function of the

Table 6 Main features of public administration system in Nigeria

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Administrative history	Geopolitical situation	Strategic/Most populous in Africa and one of the most diverse country in the world
	Colonial history	Yes (1900–1960)/British colony
	Legacy of bureaucracy	Military/Long period of military intervention
	Centralized bureaucracy	Strong/Military legacy
	Role of military	Military Influence
	Political culture	liberal
	Administrative culture	Not participative
	Professionalism	Moderate/
	Politicization of bureaucracy	Moderate
	Dominant state ideology	Secular
Legal structure	Nature of constitution	Written
	Origin of constitution	1999/Drafted by the military during the return to civilian administration
	Strong constitution	Yes
	Constitutional rigidity	Yes/Require two third majority in the parliament for amendment
	Created by	Military
	Revised by bureaucracy	Civil initiative
	Administrative judiciary System	Moderate
	Central government	State structure
Government structure		Presidential
Hierarchical structure		Strong
Local extension agencies		Too many
Central government		Yes & strong
Coordinating mechanisms		Agencies/Moderate
Transparent financing system		Moderate
Monitoring		Moderate
Independent regulatory Agencies		Exist

(continued)

service. Many reforms led to the prioritization of the federal administration over the state. The regional government was abolished and many states and local governments were created by the military. This saw the emergence of very strong central government with financial dominance over states, especially with the oil boom of the 1970s. Most of the jurisdictional powers were

Table 6 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Local governments	Financial autonomy	Non/Federal supremacy, key source of revenue dominated by crude oil production and controlled by federal government
	Political autonomy	Strong/Strong for the federating units, however weak at the local council level
	Council types	Chairman
	Mayors	Elected/However, mostly appointed by state governors
	Decision making bodies	Exist/Chairman, Vice Chairman, Supervisors and Secretary
	Central tutelage/monitoring	Exist & strong
	Subsidiarity principle	Exist
Intergovernmental relations	Decentralization type	Devolution/Jurisdictional allocation of functions by the constitution
	Logic for Division of tasks	Undefined/Vagueness in jurisdictional allocation of functions, Upper and lower levels of government jointly responsible for many functions
Public personnel system	Tutelage/monitoring	Moderate
	Communication	Moderate
	Civil services	Career based
	Scope of civil services	%of civil services
	Recruitment and promotion	Competitive/Written exams (70%), Performance evaluation report (20%) and Seniority (10%). Subject to existence of vacancies
	Nationwide exam	Exist
	Politicization in general	Moderate
CSOs/Civil society	Unionization	Strong
	Size of Civil Society	Non existence of comprehensive data

(continued)

dominated by the federal government, especially in the area of revenue allocation decisions, quality control of education and health among others. These features are still unchanged today. The strength and rigidity of the constitution drafted by the military during the return to democratic rule in 1999 is still hindering several political and administrative reforms. The local governments

Table 6 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/explanation</i>
Reform philosophy	Institutionalization	Strong
	Partnership with the state	Moderate/
	Political pressure/domination	Moderate
	Major financial revenues	Membership fees, donations, and fundraising activities
	Supportive national culture	Moderate
	Political regime and civil society relations	Moderate
	Civil society	Prestigious
	Dominant reform paradigm	NPM reforms
	Policy Transfer	Policy adoption/mostly based on International best practices
	E-government reforms	Not completed
	Artificial intelligence (AI) reforms	Partial existence/merely at policy level
	Influence of international actors	Mostly Influenced by international financial institutions as a condition for accessing loans, and International best practices
	New reforms (5 years)	Re-organization. Privatization, Service delivery, Budget/Expenditure reforms, Pay reforms, Banking reforms and e-Government reforms

Source Adapted and developed from Önder, M. & Zengin Ü. N. (2022). A Framework for Comparative Analysis: Public Administration Across the Globe. In *The Palgrave Handbook of Comparative Public Administration: Concepts and Cases* (Editors: Onder M., Nyadera I.N. & Islam, M.N.), Springer Nature Palgrave Macmillan: New York

are dominated by the sub-national governments; the sub-national governments determine administrative and fiscal decisions at the local government level. The adoption of democratic system of governance in 1999 witnessed many administrative reforms, especially the neo-liberal reforms, many government enterprises were privatized, and many performance related reforms were carried out such as creating agencies to improve efficiency and effectiveness. However, there is little evidence to show significant improvement from these reforms. Many of the privatized enterprises such as the electricity sector are still under performing. The proliferation of agencies has also led to overlap and duplication of responsibilities. Despite government's effort, public administration in Nigeria still faces some problems in efficient public services provision.

The study uncovered some major recent structural reforms including re-organization, privatization, service delivery, budget/expenditure reforms, pay reforms, and e-government reforms and banking reforms.

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Republic of South Africa

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I INTRODUCTION

The country known as South Africa has been viewed as a multicultural society that is characterized by its rich linguistic and ethnic diversity (Piombo, 2005). South Africa has a population of nearly 60 million inhabitants, of whom more than 66% were urban areas and cities in 2019. Three-quarters of the population are African (black people) 15% European (white people), and the remaining 10% is comprised of mixed white, black, and people of Asia (mostly Indian people). The country locates at the southern tip of the continent of Africa having an estimated land area of 1,219,090 sq. km. It has a land borders with Mozambique, Namibia, Botswana, Swaziland, and Zimbabwe to the north. South Africa has a coastline of 2,954 km—the Atlantic Ocean lies on the west side of the country whereas the Indian Ocean lies on the south and east side of the country. In terms of urbanization in the South Africa begin to increase rapidly through this century. It reached high as 59.2% as it still tends to increase rapidly. Nevertheless, South Africa is one of the countries in the world that experienced institutionalized racial differentiation that contains cultural and linguistic differences existing in each faction, and later the apartheid tried to change some of the structural reality of society, especially at the social strata (Barcheisi, 2004).

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McClintock (1993) argued that apartheid was a form of internal colonialism. However, the struggle against apartheid regime was largely viewed as a different and unique from considering what happened in other parts of African continent. Mamdani (1999: 132) also argued that a review of literature has shown that South Africans view apartheid as an oppressive and racist political system that needed to be studied at universities so as young generation to know about it (Wassermann, 2017). In terms of economic development, South Africa has recently emerged as a model country that attracts the attention of many countries with several modern economic institutions making the country one of Africa's fastest-growing economies in the twenty-first century. The economic policy of South Africa mainly influenced by two domestic, labor and major business, Hentz (2005). Moreover, many foreign firms operate in South Africa and use the country as a gate way to other African countries because of the well-developed economy and strong public institutions in South Africa. According to McGowan (2006), this is mainly because of the political stability of the country and the strong administration institution that created an environment where foreign firms can be attracted to invest the country. Nonetheless, when a researcher studies public administration system. It's crucial to mention that the practice and study of public Administration need to be discussed its origins and to trace its back to some of the earliest administration and civilizations (Cox et al., 1994; Fredrickson & Smith, 2003; Shafritz et al., 2004), thus, studying South African public administration system will lead us to understand a long-standing administration tradition governed by different administration and regimes. Thus, this chapter aims to discover the different milestone of South Africa's political, economic, and administrative transformation starting from the rule of the colonials in the late seventeenth century to date. This chapter also aims to examine the theoretical explanations for and practical aspects of administrative politics and recent development of the South African. This study also focuses on the current public administration reform, public personnel system and performance management.

This chapter is structured as follows: the first section summarizes the administrative history of the country. It draws attention from colonial history to current administration identifying key historical events. The second section discusses the legal structures and the constitutional framework. The third section examines the central government spheres and functions. The main task in this section is to identify the scope of decision-making in the central, roles and responsibilities of the executive in accordance the constitution. The fourth section examines the background of local government, provincial administrations, municipalities, and the financial system of local administrations. The fifth section pays attention to the recent development of SA followed by conclusion and a summary of brief description is organized in a table. Finally, this chapter in general provides useful insights on how the public administration system of South Africa is organized and how its public institutions work and report as a system of governance that provide services to their respective communities.

1.1 *Administrative History*

South Africa has a very rich history and cultural heritage that makes the country a popular destination for historic visit and tourist destination. Considering the historical background of the country, we can take into consideration when the traders from Nederland landed at the southern tip of South Africa in 1652. The Dutch traders then established a stop point and a refreshment station of their ships followed by the founding city of Cape Town. Thus, the city of Cape Town and a city administration of South Africa had its origin during this period (1652). After a battle that took place in 1806, the Dutch garrison was surrendered to the British under David Baird, and in 1814, it was ceded complete by the Dutch to the British. Nonetheless, in the 1860s a gold and Diamond has been discovered which increased the interest of British colony. The British and the Afrikaners, as the Boers ruled the country for years though they left different administration behaviors and structures. Moreover, in 1961 South Africa got its independence and became a republic after a whites-only referendum. Nonetheless, apartheid (separation) government was formed which ruled the country from 1948 to 1991. The importance of tracking the history of the emergence of the social entity in in the country stems from the knowledge of type the relationship between the settlement entity and the original community and over three centuries, and its impact on the ability of the political transition through which power was transferred from the minority group (white) to the majority group (black) in 1994, and to uproot racist social concepts that have long been established history, and then moving society from the stage of conflict to the stage of coexistence and solving the problem of identity cultural heritage that the country still suffers from (Schiff, 1996).

The history of European migration to South Africa dates back to 1652 when Jan van Riebeeck, a Dutch employee of the Dutch traders, founded supply refreshment stop for their company's in region. In order to produce the supplies for ships, Riebeeck brought in workers from The Netherlands. The motives for immigration and settlement for workers were the need to work about political freedom or escape from prosecution, while others migrated in search, trade, and religion. When the company failed to absorb the increasing production of settlers with their natural increase over centuries, many of them began to seek their livelihood within the country, away from the control of the company, and then work as fishermen or traders with indigenous tribes (Hutentot), who shared with them the produce of agricultural and animal products. Thus, during the first century of settlement, they emerged as cattle farmers. Thus, they themselves became farmers, historically called Boer-Trek (Aartsma, 2008).

During this stage of settlement, there was no clash between the white settlers and the indigenous people; the Dutch immigrants did not use force as soon as they arrived in the new society, but were received peacefully in that community until they were built their settlement The influx of European

immigrants to the Cape area of Dutch, French, German, and Asian workers brought by the Dutch east India movement to work, and England, as well as the size of migration began to move inward by the Boers, especially after the situation worsened when Britain occupied the Cape in 1795 after the defeat of The Netherlands. Consequently, the flow of English and Scottish immigrants who were generally more educated, wealthy, and industrious had begun. English speakers became the elite of the two colonies of Cape (Schiff, 1996). Since then, the British administration abolished slavery in 1833 and established laws that limited the Boer's ability to acquire new land (Latif, 2006). At the time of the great migration, the Boers took the land from the original inhabitants, massacres were carried out against the Hutentot and the Boschmen and offered control of the Shona and entered into fierce battles with the Zulu tribes. The Battle of the River of Blood, which took place on December 16, 1838, was one of the most famous battles between the Boer settlers and the tribes that ended with the victory of the Boers. The day of the battle was the fifth day of the Zolk Afrikaans because the narratives remember that the Afrikaners pledged the Lord to worship him and they won 5 in this battle (Schiff, 1996). Migration and settlement in South Africa and the subsequent conflict between immigrants and indigenous peoples led to the creation of a multi-ethnic and multiracial State, each of which had its own cultural, linguistic, religious, and civilization characteristics of the (5) million white Africans. There are also a large number of Jewish and Portuguese communities, with a population of 300,000. Jews and a group of Eastern European immigrants who fled to the country after the collapse of the socialist camp. (3 million) Afro-native speakers of mixed or (colored) elements, 13 of the Asians, who number about a few hundred thousand and all these divisions and pluralism, are the total races that migrated to the country in a period of more than three centuries. Population of origin Africans who represent the majority of the population and the population of adult are 30 million. The confrontation between the Afrikaans and the English rule and settlement added another element of support in building the Afrikaans nationalism. The hardships facing the Great Trek were the idea on which African nationalism was based, and the descendants of those who emigrated were still dependent on those who remained in the province of Cape Town British rule (Schiff, 1996).

The talk of nationalism meant the nationality of the Africans until 1948, when the National Party, led by Dr. Malan and composed of a special Afrikaners won the last round 21 of the Boer War (Latif, 2006). The South African Bantu population has suffered from discriminatory policies since the beginning of the migration of the eggs to their countries and settled in a series of racist wars that enabled the whites, as a result of their military superiority, to take over the lands of the African tribes. The expansion of the Afrikaans and English settlements led to a deep disturbance among the Bantu tribes, the seizure of their lands shattered the last features of agricultural independence, forced the Africans into a life of homelessness and acted as a driver in the service of the white community (Schiff, 1996). Nevertheless, in 1934

the United Party (UP) was formed to take over the administration system of the country. Black people's voting rights, freedom of speech had been introduced in the country and the 1936 Natives Land Act was reinforced the 1913 Land Act was extended. South Africa normally accepted the Westminster model of governance from its parliamentary democratic system and became an independent country. After South Africa got its independence, it faced a number of political and social problems, including the election in 1948, massive unemployment, and Apartheid regime (policy of separation) known as a racial system structured on three pillars: (1) based on discrimination (2) territorial division and political representation (Dugard & Reynolds, 2013).

1.2 *Legal Structure (the Constitutional Framework)*

South Africa adopted one of the most original, participatory and most democratic constitutional drafting in Africa. It embodies a transition from authoritarian rule to rules based on democratic principles and inclusive constitution making. The constitution came into force in 1997 after the end of the discriminatory apartheid regime in 1996. However, in a country like South Africa, where discrimination and deep divisions were still exist in the society, and there was a little room for solution. Thus, a closer observation of events was seemingly suggesting a society with an inherent interdependence (Hanf et al., 1981; Horowitz, 1991; Adam, 1977). Thus the constitution of SA broadly speaks and it the product of and reflects a transitional spirit, conflict resolution and electoral approach. Moreover, a lot of negotiations has been adopted to make the constitution really a “community contract” and many solutions have been sought. Most importantly, the constitution-making process was seen as a means of both achieving a democratic structure and ensuring social peace. There were three prominent principles in the process of a new Constitution: consultation, participation, and reconciliation. The 490 members elected to the Parliament in 1994 elections established a Constitutional Assembly whose task is to prepare and approve the constitution within a period of two years. In order to facilitate the negotiation process and provide the necessary administrative support, a constituent assembly administration, multi-party constitutional committee which will carry out these activities within the Parliament, and a subcommittee to work on the six themes under this committee was established. Following the preliminary work done by these bodies, a comprehensive communication campaign was launched in January 1995 to receive public comments. Despite the existed societal difficulties such as: the large number of rural inhabitants and the “black” people who suffered not exercising their political rights, lack of education, poverty, cultural differences, etc.; the aim was to provide conscious participation of the people. Between January 1995, the beginning of the communication campaign, and November, when the first constitution was presented, there was an intense

participation by applying many methods to get public opinion. The constitution of SA is the supreme law of the country and promises equality as well as protection from unfair discrimination (Cameron, 2007).

There are no other laws, policies, or governmental actions that can supersede the provisions of the Constitution and its laws. The governments' legal structure is organized as national level, regional, and local levels which are distinctive, interdependent, and interrelated to one another. Additionally, SA constitution contains an important democratic principle that clearly makes a separation of powers between the different levels of state institutions. This indicates that the power of the state organs is divided into three levels of the government and are somehow interdependent with each other, namely the executive branch (the president and the cabinet) and the legislative branch (parliament and province legislation) and the judiciary branch (national and district courts). South Africa has also established other courts to provide speedy resolution to community problems such as community courts, income tax offenders, land claim courts, electoral court, civil courts (divorce courts), sexual offenses courts, and military courts. A review of literature has shown that, the legal system of modern South Africa is based a mixture of Roman-Dutch law and English common law. The legal authority of South Africa is being assigned to the Supreme Court, provincial, and local authorities have also their own courts. However, minister of justice is responsible for administrative justice of the state. The justice Ministry guides all legal procedures in accordance to the constitution and the laws approved by the National Assembly. Also, South Africa has lower courts that are controlled over by civil service judges who have a limited jurisdiction in civil and criminal cases. Currently, there is 266 magisterial districts and 266 magistrates' offices in South Africa (South Africa Yearbook, 2002/2003). Nevertheless, the legal profession of the country is distributed into two divisions (1) advocates (2) attorneys and lawyers—these two legal divisions are subject to strict principles and ethical legal codes. SA also, have state legal advisor that provides legal advice to the ministers and other governmental institutions such as provincial administrations (South African Yearbook, 2018/2019).

2 CENTRAL GOVERNMENT

Every nation in the world has a constitution and government that outlines the government structures, roles and responsibilities. Thus, government is a system of government governing by organized society and generally provide defense, establish law and order, and promote general welfare by deliver public services to their respective citizens. There are different models of government South African government, however, selected parliamentary representative system of democracy where the majority elected party forms the government and does the administrative business in the state. In South Africa three bodies primarily stands in the government structures, namely the president, and his cabinet, the parliament, and the provincial levels. An example of this

Table 1 Central government of South Africa

<i>Legislative authority</i>	<i>Executive authority</i>	<i>Judicial authorities</i>
The legislative authority comprising: <ul style="list-style-type: none"> • Parliament (national) • National Assembly (350–400) • National Council of Provinces (90) • Members from each 9 provinces • Provincial legislature (provincial) 	South Africa National Executive Branch Comprising of: <ul style="list-style-type: none"> • The President • The Cabinet (national) • Provincial executive council • Members of executive council • Government and Central Institutions 	Courts including the: <ul style="list-style-type: none"> • Constitutional court • Supreme court of appeal • High courts • Magistrate's courts

Source Author's compilation

would be the executive, parliamentary, and judiciary branches of government (Theunissen, 2000).

According to the constitution of SA the President is both head of state and head of government. Contrastingly, in the parliamentary democracies, the head of state is a ceremonial figurehead with limited power or no executive power in leading the state. Whereas the prime minister roes as he heads of the cabinet and the leader of the ministers in executive branch. Moreover, National Assembly (the Parliament) elects the president. The president is expected to promote the people and lead them based on the country's interest and in accordance with the constitution and the other laws of the country. Nevertheless, the president has to appoint a deputy president from among the members of the national assembly. The president can select a number of ministers from among the members of the National Assembly and selects no more than two ministers out of the national assembly. The deputy president has constitutional power including assisting the president in his/her executive roles and he may be assigned any government portfolio by the president decree. A review of literature has shown that, African National Congress (ANC) which is being considered the oldest liberation movement in Africa dominated government represents of South Africa (Schrire, 1992) (Table 1).

2.1 *Scope of the Central Government*

The National Assembly (Parliament), the nine-province legislative council (National Province Council), and the all the local government councils are subject to the constitution. The South Africa government is divided into three levels such as (1) national, (2) provincial, and (3) local governments. The Constitution of the country clearly states every level responsibility and functions of their councils. The central government is responsible for

policy formulation, foreign policy, security, finance, and developing democracy at national standards and norms in accordance to the constitution of the Republic. The Provincial governments, for instance, are responsible for providing goods and service to the local people such as; ambulance services, long and short-term city planning, infrastructure and cultural matters. Other services such as local amenities, markets, municipal abattoirs, municipal roads, hygiene, and sanitation noise pollution and street trading local government deals with South Africa Yearbook (2018/2019).

2.2 *The Parliament (Bicameral Legislative)*

The 1994 Constitution grants a legislative body with two houses namely the National Assembly consisting of 400 seats and National Council of Provinces consisting of 90 seats. Members of the National Assembly are elected by people with proportional representation to serve the country for a five-year term. The elected National Assembly passes laws and procedures and the National Assembly also elects the president of the Republic. The National Council of Provinces replaces Senate, and it contains of 90 members. These members come from each of the nine provincial legislatures representing the provincial interests in five-year terms. Each of the nine provinces sends ten representatives where six are permanent members and the other four members are elected in the national elections.

The National Cooperation of Provinces (NCOP) election is supposed to grant that minority interests are represented in each province's delegation to the NCOP legislative house. The National Council of Provinces (NCOP) stands for provincial interests in the central level of the country. South Africa is a country where society is ethnically divided. The election of (NCP), unlike the other elections, gives the population equal rights for competing in the election. The women in South Africa have a good number of representatives in both of Parliament houses. In the national legislature, women secured 119 out of 399 seats (30%). Whereas the National Council of Provinces (NCP) women have secured 17 out of the 89 seats (32%). The house of National Council of Provinces came into existence in February 1997 (South Africa Yearbook, 2002/2003) (Table 2).

There are also other state institutions supporting democracy and development in South Africa operating both national and provincial levels. According to yearly book, 2019, these institutions drawn from South Africa's traditional leaders. It is stated objective that the country be run on a cooperative based system. The advisory bodies include the following:

- Human rights commission
- Commission for the promotion and protection of the rights of cultural, religious, and linguistic communities
- Public protector
- Commission of gender equality

Table 2 Types of institution in South Africa

<i>Types of institutions</i>	<i>National</i>	<i>Provincial</i>	<i>Local</i>
Executive authority	President, deputy president, and the cabinet (national)	Members of executive councils (<i>Provincial public services</i>)	Local executive structures
Legislative authority	The president, the parliament <i>and the national council of provinces</i>	Provincial legislatures of the 9 provinces	Municipal councils
Judicial authority	Constitutional court and the Supreme court	Provincial division	Magistrate's courts

Source Author's compilation

- Independent commissions authorities of South Africa
- And the auditor general of South Africa

2.3 *The Financial System of the Central Government*

Financial resources can be defined as all capital received irrespective of its sources (Hattingh, 1998). Thus, governments and public institutions demand financial resources to provide services and implement their duties in effectively and efficient way. Therefore, distribution of financial resources between the levels of the government is essential. Nonetheless, in South Africa all financial matters and allocation of resources designed by the constitution of South African—Chapter 13—(1996). Similarly, an act of the parliament offers fair distribution of income between national, provincial, and local governments. Moreover, national revenue fund indicates all finance received by the national government must be paid and the share of provincial incomes raised at the national level must be paid out of the national revenue fund. (Section 213, 214—SA constitution—1999.) The Revenue Service (SARS) is the revenue service responsible for the collection of tax the revenues have dramatically increased. Its revenue reached the highest point of 144,778 ZAR Million in 2016 and a record of the lowest of 36 ZAR Million in the Apartheid era of 1961 South Africa has a fair division of income and revenues between the central government and local governments, considering their respective functions (South Africa Yearbook, 2015/2016).

South Africa government collects taxes in accordance with residence income-based tax methods to earn revenues. Residents of South Africa are subject to pay taxes based on their living condition and income, regardless of where they receive the income. Nevertheless, the National treasure is responsible for giving policy suggestions to the Minister of Finance on tax policy matters and controlling the finance of the country. The main tax revenue

sources in the South African government are the income tax pays by the individuals, companies, value-added tax (VAT), and customs services; they all are an important source of financing the government business in the country. The central government also collects and charges the following institution: Company Income Tax, employee, Value-Added Tax (VAT) Excise duty, Environmental Levy, Fuel levy, Transfer duty, Estate duty, Dividends Tax, Securities Transfer Tax, Unemployment Insurance Fund (UIF), Tax on international air travel, Rates on property, and Customs duty. The South African Revenue Service (2018) discovered that the main sources of revenue in South Africa in 2018 was Income tax—personal (38.0%), Value-Added tax (24.5%), and income company tax (18.1%).

2.4 *Local Governments*

The local administration in South Africa is the 3rd distinctive level and interdependent element. The local governments legislative and executive authority are outlined in section 151 of the (1999) constitution. The Constitution sets prospect of the unification of more than 1000 racially defined local authorities and administration into 842 transitional and local administration (Steytler, 2006). Additionally, a definitive statement on local governments, in which local authorities is firmly established as a mature sphere of government is compromised by the constitution. The local authorities in South Africa contains—municipalities headed by municipal councils, legislative, and executives' authorities over any issues related to local regions and communities. The local governments in SA have established departments that assistances the authority's policies by implementation rules and regulations aimed at bringing development and service to the local communities.

Nonetheless, to promote that the unity, the central government is preserved municipal governmental plans, activities, and actions have to follow to the legislative and rules in national and provincial levels. For instance, provincial authorities are needed to supervise municipalities to ensure that essential national standards and minimum values are met for service delivery, economic development, job creations, and economic unities. The local governments in South Africa are considered to be the closest level of government to the local people, especially in rural areas because it operates at a local/community level, and municipalities that mostly deal with the problems and needs of the communities. Municipalities role include providing water, building dams, provision and maintenance of infrastructures, and promoting local economic improvement. Additionally, local government in SA promotes people to involve in local issues, since community participation is very important. The South African local administrative is divided into local municipalities and district levels. Therefore, each municipality has a council and legislative authority where decisions are made, and community participation is encouraged. According to 1998 municipality act provides a legal framework for the establishment of local government institutions. The act indicates institutions to

have two model of local government—(1) single tiered metropolitan municipalities and (2) two-tiered structure of district and local government (de Visser, 2009).

2.5 *Background of Local Governments in South Africa*

Local sphere of the government of South Africa remains the core sector for providing basic services for the country. Meaning the South African local government is the closest sphere to the society involving a wide range of services that directly affect the lives of ordinary people. South African government, therefore, just like any other form of government has assigned the local government with the role of delivering those services that is beneficial to the local communities and to the societal welfare. When writing emergence and the development of the local government in South Africa, it is important to take in to consideration the origins and factors contributing to the establishments of the local government in South Africa. The origin of the existing local government system is argued to be resulted mainly from Dutch and British influences. Both these Dutch and British colonials left their mark on the local government structure. However, the period that Dutch occupied Cape of Good Hope from 1652 until 1795, they didn't affect the administrative structure of South Africa (Cape of Good Hope, 2007). Furthermore, the British influence that took place during their period of occupation between 1795 and 1803 and again from 1806 to the time South Africa became a Union in 1910. According to Cloete (1988), local authorities in South Africa emerged gradually at the Cape of Good Hope after Jan van Riebeeck who represented the Dutch administration in the East Indian Company arrived at Table Bay by ship on 1652. The urban area known as (Cape Town) emerged gradually from a village into a town and eventually into metropolis areas (Cloete, 1988).

The foundations for a system within the local government emerged with an elected legislative and councils with policies and actions similar to the present-day city, where towns and councils were laid when the Municipal Ordinance for the Cape Colony took effect in August 1836. This system was introduced by the Dutch colonial administration consisting of local government groups, namely the College of Landdrost, the Heemraden, and the local court members, with Stellenbosch being the first seat of the local government (Cloete, 1971). It has been argued that cities in South Africa are relatively young in comparison with those in Europe and North Africa. Local authorities with decentralization policies known today emerged gradually at the Cape of Good Hope after Jan van Riebeeck arrived by traveling on the sea on 6 April 1652 (van der Waldt, 2007). The White community moved further into the big cities and areas where the people made movements. Villages were established and for each village, a council and legislative authority were appointed. These councils of Landdrost and Heemraden continued to govern the villages in the Cape colony until the administration was abolished in 1827 by the British administration. The British then took over the governing of the Cape

Colony from the Dutch in 1806 (Cloete, 1993). In 1836, the Cape Municipal Ordinance No. 9 of 1836 was approved, the Ordinance provided for a board of commissioners for the various towns and only persons who paid property taxes could be elected as commissioners during that period (Ismail et al., 1997).

2.6 *Scope of Local Governments*

The 1994 constitution of South Africa gave a significant role to the local government shapers. The scope of the local government in South Africa is merely from an administrative arm of the central government to an equal partner in government structure. The local government system operates in all the provinces. In South Africa, the Constitution gives lists of operational activities that the local government is undertaking. The Constitution, for instance, provides municipalities with the necessary legislative and executive power to administer and fulfill these functions. These functions carried out by the local government are vital services to the people of South Africa like; education, water, sanitation, and public health, housing, and waste collection. They also provide recreational facilities to maintain local roads and public libraries. They enforce local laws and undertake legislation for which they have been authorized (Greater Johannesburg Transitional Metropolitan Council, 1998). The administrative system of the local government in the South African provinces leads the activities and actions aimed at bringing prosperity to local communities. The nine provinces are divided into metropolitans comprising of eight cities. After the metropolitan district, municipalities being further divided into local municipalities are then divided into wards, all these administrative divisions are interrelated and independent from each other.

2.7 *Municipalities*

The constitution of South Africa indicates for three categories of municipalities. There are 278 local governments, comprising 8 metropolitan areas, 226 local municipalities, and 44 district areas. The municipality functions improving the infrastructure and empowering growing local economies by providing services. In metropolis areas, the constitution gives two types to the mayor of the government (1) the mayor executive authority where the mayor has an executive power (2) the collective committee where the committee has the authority and the power in the council. According to the Constitution of SA, local governments grouped into three types of governments, namely;

- *Category A:* Metropolitan councils—currently there is six metropolitans (Tshwane, Durban, Ekurhuleni, Nelson Mandela, Johannesburg, and Cape Town).

- *Category B*: Municipalities that shares both municipal legislative and executive power especially, areas where Category C municipality falls (Currently, 231 in category B).
- *Category C*: Municipalities that has municipal both executive and legislative power especially, areas that comprises more than one municipality (currently, 47 in category C).

Local government system has many responsibilities in performing daily activities including but not limited to tourism, local market, health services, public transport, licensing of dogs, traffic, and other services that local people need. As pointed by the Constitution Local administration and municipal structure Act, 1998 (Act 177 of 1998) provides criterion determines when municipalities can be under one of the following categories...

- Category A: municipality (Metropolitan Municipalities)—Category B: (Local Municipalities) and Category C: which is (District Municipalities).

2.8 *Provincial Government*

South Africa has nine provinces that came into existence after the 1997 elections; the provincial government that has their own legislative and council. Provincial council are determined, according to a formula set out in the national legislation. The members of the National Provincial executive council are chosen in proportional representation way of election, which means local people vote for a party, not an individual. The province councils consist of premier—the premiers are appointed by the President. The province role includes improving the lives of local people, and their decisions are taken by national consensus. However, besides being able to make a decision by participatory approach provincials have their own councils, legislative and executive powers, as the national level does. The provinces legislative and executive powers are as follows (South Africa Yearbook, 2015/2016).

2.9 *Central-Local Government Relations*

The relationship between central and local authorities is crucial for the stability and prosperity of the country (Islam et al., 2020, 2021; Nyadera & Islam, 2020). The central government of SA is the body responsible for policy initiation, overseas finance, national defense, foreign affairs, and all laws necessary and proper. Whereas, local government is being considered as the third sphere of the government that being created to bring government policies to the grassroots positions. Thus, the relations between these two spheres is important in order to provide an organized system where power and responsibilities work together for order, and good governance practices. However, the relationship between central and local governments of SA has been questioned

the interpretation that the elected officials must wield power and the state to protect the local administrations (Redy & Sabelo, 1997). Thus, South Africa is nurturing a cooperative system where measures to harmonize relation between central, and local authorities are being encouraged and prompted. The below table illustrates approaches to government relations which is highlighted by having a democracy, that offers for the formation of state institutions accountable for strengthen constitutional democracy. Finance relations, since local government are somehow dependent on the central government supports, it's important to mention that SA did not separated from local authorities the political system. It's highlighted that having democracy is important that provides for the state institutions to strengths the constitutional democracy. Interns of financial relations between central and local authorities transfers through and by means of legislation. In the normative relations, it indicates that policy development or action of public administrator when making a policy or decision between various decision-making alternatives should, if possible, take into account all necessary steps.

2.10 *The Civil Service System*

South Africa's democratic government was first elected in 1994. The elected democratic government developed a public service act and was approved by the parliament in order to create equal opportunities for all South Africans. The public personnel system in South Africa deals with public service employee and ordinary people who receive service from the government. The public personnel system in South Africa regulates two approaches of managing and leading the Public Personnel in SA; (1) the closed structure and (2) the open structure according to the public service policy (1994) as amended by the Constitution 10 (2). The first system of governing in the South African public personnel system is the closed system that can be called the process mode. This system contains six main functions, namely; staffing, policy making, organizing, determining work procedures, financing, staffing, and controlling of public personnel. The second system is a recent one called the open-system of public service manager's, and it functions with a general and a specific environment with the public employee to learn the public management operations of policy developing and analyzing, planning, organizing, managing, leading, motivation, controlling public finance and evaluation of public personnel skills and decision-making, and management of change. Civil servants in SA were thus structured functionally. Legislative provisions were made for their conditions of service including remuneration, pension, leave, and allowances. Thus, such an administration is referred as a 'development bureaucracy' (Wallis, 1996).

2.11 *Recruitment System*

The recruitment process is the first step taken during civil servant hiring in SA. The main task in this process is to make sure that institutions engage candidates that meet the minimum requirement of the role advertised. Also, the recruitment process is a process that organizes by the respective institutions and encourage applicants with a specific qualification to request and submit their application for the available jobs (Carrell et al., 1997; Milcovich & Boudreau, 1994; Werther & Davis, 1996) in South Africa, candidates are recruited using internal or external source evaluations and selection process (Singer, 1990). However, the sources of the positions in South Africa depends on the qualifications, skills, experience, and the competences of the applicant. Interns of appointments it's only successful when it leads to appoint a competent staff who effectively perform his/her duties. Thus, the recruitment of civil servants in South Africa are mostly recruited through an open merit-based system. The advertised position and available jobs are very competitive because of the large number of people in South Africa are not employed makes the position highly competitive. Thus, and very few people are hired in the public admiration. The aim is to first identify the most suitable person to be employed in the public administration, from the widest possible pool of talented people from the Republic of South Africa and second, the government is trying to make the Public Service delivery more accessible to all citizens from national to local level.

Nevertheless, the government of South Africa also targets to achieve equal opportunities to all people within the framework of the public administration context. The selection criteria of the South African public personnel system are centered only on the inherent requirements of the positions to be filled. Nonetheless, during recruitment process the government organizes exams and interview on both local and national level. Furthermore, the national and provincial governments have more requirements defined with their legislative laws. The employment in the public service in the country is regulated to only SA citizens between 16 and 60 years old. All candidates regardless race, gender, and ethnicity have equal chance to be selected. Additionally, former staff in the public sector who have resigned and/or retired early can be re-employed if they successfully apply for a post through competition. Civil servants mostly fall under the provincial government level; these civil servants include school teachers and nurses. The Public Service is the most valuable asset in South Africa and most of the public sector employees are employed on continuous contracts. However, there is a fixed-term contract, (six to twelve months) to let the National and Provincial levels to get access to scarce skills and are able to develop greater service in long-term objectives. The recruitment and selection is an important process and should attract appropriateness or qualified applicants to enable a transplant closing process (Beardwell & Holden, 1995).

2.12 *The Legal Base*

According to the constitution of the South Africa in 1996 indicates eight principles toward public service departments of the country; the public administration should apply all the following principles (HRM in the Public Service, 2010).

1. High ethical and professional standard.
2. Efficient and effective use of resources in the public management sector.
3. Public organization should be development-oriented and change.
4. Public services must benefit country, and the people. Services should be provided impartially, fairly, equitably, and without bias.
5. Peoples' needs should be responded to, and the people also should participate in the policy development and implementation process.
6. Public administrations and employee should be accountable.
7. Transparency should be fostered and every citizen should access accurate information.
8. South African Public Administration should be broadly representative to all people. The employment opportunities and personnel practices should be based on objectivity and fairness.

Moreover, the government of South Africa adopted policies aimed at improving its public sector management. Additionally, to ensure the above-mentioned articles is achieved and citizens get services impartially, fairly, equitably, and without bias clearly mentioned under HRM in the public service management. Nevertheless, the study observed that these eight principles has not yet been fully achieved and/or effectively implemented in both central and local administration.

2.13 *Central Government Reforms*

South Africa is still at the developing stage, meaning institutions are establishing newly to improve the recently established democratic institutions, economic and political roles of local and national governments are still improving. However, since 1994, the government of South Africa implemented reforms in the central government especially after the end of the Apartheid policy in 1994. These reforms include: the development of constitution, abolishing apartheid regime, and adopting democratic elections at both local and national levels were held for the first time in the history. President Nelson Mandela was elected as the South Africa's first black President and the last remnants of the Apartheid regime was finally outlawed. Furthermore, South Africa created four levels of administration aimed at making the country more decentralized compared to the previous apartheid administration. Reforms at national, provincial, district, and municipal levels indicates that arrangement of checks and balances has been put in place to make sure

that no branch of the government overestimates itself. An anti-corruption act has been put in place as well as special courts to fight and protect corruptions that are made. The anti-corruption act monitors the branches of the government such as its; activities, the president, legislative, judiciary branch, and executives. South Africa's land allocation is a big problem because during the Apartheid era the white minority had been allocated around 87% of the land and only 13% of the land had been allocated to the native people (majority) in South Africa. Central government has built around 1.6 million houses for the poor people to make sure that every South African citizen has shelter and privacy. Reforming the land was an important rallying for the liberalization movement in years after the Apartheid Regime ended, and the newly elected government in 1991 found it extremely difficult to redistribute the land fairly because 87% of the South Africa's land owned by the white, (minority) though they present less than 10% of the total population. African National Congress's (ANC) government reformed the land and distributed 30% of the land from the white's minority community to the black majority community 2010.

2.14 Reforms in Local Government

Local government reforms in have been taking place from South Africa since 1994. It was the departure of apartheid when South Africa adopted a more decentralized democratic system at all three tiers of government structures with the transfer powers. Since then, a paradigm shift of local governments and reforms changed South Africa's local government picture from centralized institutions to democratization and transformation of the state institutions aimed at building a development state that took place between 2005 and 2015.

Nevertheless, a review of literature has shown that South Africa is at the development stage, meaning many policies and rules aimed at promoting the country and the people have been produced since the country moved to democracy from the Apartheid Regime Chipkin & Lipietz (2012). One the other hand, local authorities have developed municipal policies, rules, and boundaries between districts and the local government which did not exit during apartheid regime. For instance, the city of Tshwane, which is a Metropolitan Municipality covers many cities such as Pretoria, Temba, Centurion, and Hamman kraal. The city is functioning as a metropolitan municipality since the first election of the local governments. Thus, these changes have improved South Africa in terms of its local administrative and also its local community's access to justice, a service of the government.

2.15 Coordination System

South Africa has created an agency that is responsible for the integration and relation between all levels of the government. This agency known as "the President's Coordinating Council" (PCC) was established in 2005 to

promote the relations under the act of intergovernmental relations framework. The president's coordination council (PCC) brings together all the three spheres of the government on issues that matters such as: security, development, immigration, common interest, and national unity, the participation of the community in political issues, and thereby strengthening the cooperative between different levels of governments. Additionally, the body discusses and evaluates the mechanisms for monitoring, job creation, and implementation of the "new growth path" (NGP) and national development plan (2030). Finally, the President's Coordinating Council (PCC) shares experiences in creating an environment for job creations in the provinces level and the national level specifically by focusing on local issues and what needs to be in place in the public administration of South African needs (South Africa Yearbook, 2015/2016).

2.16 *E-Government*

Over the last decade, the government of South Africa recognized the significance of ICT (Information technology) sector and recently paid more attention in improving the e-government strategy aimed at promoting the standards of the public services in most efficient and effective way (Mutula & Mostert, 2009). To make sure this is achieved the government has created a web portal named "Batho Pele Gateway" which provides information on government services and other information such as housing, economic, police, legislation, and rule of law (Naidoo, 2012). Additionally, government of South Africa established the "Department of Public Service and Administration" (DPSA) which is responsible for the coordination of government's overall e-government strategy. Additionally, other key legislation for e-government include "Public Service Act" of (1994). These institutions provide for among others, the establishment of norms and standards relating to e-government and information management in the public service (Department of Communication SA, 2013).

Moreover, the department of public service and administration (DPSA) promotes the use of Information technology (ICT) to improve government's services. This has been an effective way for citizens to gain access to government services. This is a progress made compared to South Africa before it moved to democracy and adopted good governance principles. Nevertheless, SA has established other institution known as "the statutory bodies" to co-ordinate implementation of e-government programs. These include: state information technology agency (SITA) government information technology officer's council (GITO). These institutions deal with the implementation and maintenance of e-governance related projects. Nevertheless, since the adaptation of democratic government e-government services have been growing for instance, the country introduced e-government systems through accessible. South Africa also has e-home affairs and a revenue service e-filing system. Furthermore, local governments have recently introduced an initiative

in relation to promoting e-government strategy such as Gauteng's e-invoicing services, the city Ekurhuleni's online system for paying rates. According to the United Nations index, five countries refers to the generic capacity of the public sector to use the e-government and information technology. These countries are: South Africa, Botswana, Lesotho, Namibia, and Swaziland; this indicates that the South African e-government provides a high quality of ICT and services to the people from both national to the provincial level (World Public Sector Report, 2019). Nevertheless, provinces have also established their own e-government's department known as "the e-government department." Since the establishment of this department, service delivery has been modernized and became easily accessible. Furthermore, the e-government departments seek to, among other things to end the traveling of people to province offices frequently, the system, for instance, brings about better front-line service deliveries to the people of South Africa. Thus, South African government is implementing e-government together with other strategies such as poverty alleviation and improve the standard of peoples (Mutula & Mostert, 2009).

2.17 *Non-governmental Organization (NGOs)*

Non-governmental organizations (NGOs) have been variously referred to as a group of people having a common interest to meet a particular need in their communities. NGOs has no connection with the government of any countries since they are non-governmental organizations trying to answer social needs and do something other than profit making. The World Bank defined NGOs as an organization and/or institution that have certain basic values, principles, and system of cooperation to their own project and programs aimed at bringing development to their communities and the society they are serving (World Bank, 1990). Nonetheless, non-governmental organization can be organized on a local, national, or international level. In South African context, NGOs mostly operate in local levels in the country to perform social services and humanitarian functions. NGOs and international organization are crucial and can act independent actors in the international system while they aim to contribute to the well-being of the societies (Viotti & Kauppi, 1999).

Non-governmental organizations (NGOs) in South Africa can be discussed in to three ways. The first type is NGOs that have cooperative relations with the government institutions and mostly these types of NGOs participate in policy development process and implementation organized or leading by the governments. The second type of NGOs in SA consists of social movements and nonprofit organizations that oppose the government's policies in order to get heard the voices of the marginalized communities. The third type focuses on humanitarian issues mainly by supporting poor families from the village by helping poor and marginalized communities in their daily lives to survive (Habib, 2005). In 2014, South African government registered 127,000 nonprofit organizations (National Education Collaboration Trust, 2017), and there was about 2560 NGOs in South Africa in 2001 (Barnard &

Terreblanche, 2001). Nevertheless, NGOs in SA operate in a number of programs and activities such as: capacity building training, HIV/AIDS, education, health, women empowerment, community development, human rights, election, democracy, jobs and employment, good governance, gender equality, water and sanitation, research and development. In South Africa, most NGOs work under women empowerment issues and HIV/AIDS, around 100 NGOs deal with disability issues, while others specialize education sector, health, environment, and public welfare (Barnard & Terreblanche, 2001). NGOs play an important role in endorsing development and building popular human rights environment across the country. Moreover, the NGOs support South Africa people who remain vulnerable from abuse of power, fight corruptions, and racial and political conflict. Additionally, non-governmental organizations play a key role in building sustainable reconciliation process and capacity building to the South African civil servant as its vehicle that secures democracy and promotes good governance. Currently, the NGOs in South Africa is a position to make a huge impact on local and regional development. Nevertheless, there are a lot of activities and roles that the non-governmental organizations in South Africa are operating these roles include the following:

1. Increasing local administrative capacity building to create effective participation of the people in their programs and policy development process.
2. NGOs enables South African People to organize themselves and implement activities affecting them.
3. NGOs increases the access of people to information and promotes freedom of speech and media.
4. NGOs provide education and health care in South Africa.

Nonetheless, NGOs have a more fundamental role in promoting poor and marginalized communities and fostering policies that promotes democracy and good governance principles (Kilby, 2006).

2.18 Recent Developments

South Africa has made a significant change to improve the well-being of its people since the adaptation of an inclusive constitution and transition from apartheid (separation) rule to a peaceful democratic system of government in 1990. Thus, South Africa made this historic change despite 40 years of institutional racial secretion that exited in the country and provided an example of reconciliation efforts to the rest of the world (Gray & Mazibuko, 2002). This change followed the adaptation of national elections which resulted the birth of a democratic country and the first black president elected in history. Since then, South Africa has been developing interns of its public institution, education and health sector, and human rights. However, considering during the apartheid administrative system this was not the case. For instance,

the public sector was characterized by fragmentation of structure, lack of co-coordinators, policy frameworks, unequal allocation of financial, land and human resources between white and black South Africans, as well as disregard for the democratic requirement of public accountability. Nevertheless, after the end of the apartheid rule South Africa succeed to build an inclusive society, enhanced the capacity of the state institution, prompted the capacity of the civil servant, democracy and good governance principles. Additionally, public institution has been established with non-racial policies in place and created an ethical workforce environment. Moreover, to improve local governments and address their unique challenges South African government adopted “District Development Model” (DDM) that arranges the foundation to function in a coordinated manner for the different levels of the government. Furthermore, this model enabled public institutions to partner with the community in the delivery of public services. It further enables local governments to focus on development in accordance their mandate.

South Africa hosted the world congress one “united cities and local governments” with the participation city and regional leaders. South Africa also launched (MoU) memorandum of understanding between international organization (IO) and the department of government cooperation, to assist urban transformation and to facilitate local government to role the localization of the efforts aimed at achieving sustainable development goals (Islam, 2019). Nevertheless, e-government was given priority to support the digitalization of services delivered by the government departments. Thus, South Africa has established an environment where citizens can able to access and get the information and other documentation that government provides to the people across the country. Other recent development includes—(education)—de development of early grade reading program, national school nutrition program, and safety school program. In terms of infrastructure—the program of sufficient energy, municipal infrastructure grant, and alternative energy solutions has been developed (Önder, 2006).

3 CONCLUSION

This study covered some significant points of the South Africa’s history and governance including; the political culture of the country, constitutional framework, legal structure, local and central organization as well as its financial and tax revenue systems. The study also explored some aspects of the South African public administration system by observing the different milestone of South Africa’s political, duties and administrative transformation since the apartheid regime abolished. This chapter, correspondingly, highlighted some other issues including the administrative reforms and recent developments in the country. This study found out that South African public administration has experienced a significant transition from Apartheid rule to democracy based public institutions and human rights rule. Nonetheless, the chapter noted that the apartheid policy bears a strong imprint of the public administration system

with long-lasting, path-dependent effects. Furthermore, as outlined in the introductory part, South Africa benefited its strategic location and emerged as a model country that attracts the attention of many countries with several modern economic institutions and strong public bodies. Additionally, the e-government systems that are available across the country indicates that there is a progress that has been made in providing public service to local people in both urban and rural areas. On the other hand, there have been improvements in recruiting interns for civil servants. This study found out that a system of recruitment process named “the public personnel system” has been developed to achieve equal opportunities for all people. Additionally, South Africa developed the talent acquisition policy known as TAP (2010); this policy guides local governments and provincial departments to integrate national recruitment procedure with their local employment policy, especially when it comes to appointing specialized staff and/or consultancy (Table 3).

Table 3 Public administration system in South Africa

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Administrative history	Geopolitical situation	Strategic
	Colonial history	Dutch (1652–1795—1803–1806) United Kingdom (1795–1803—1806–1961)
	Legacy of bureaucracy	Military–Colonial legacy
	Centralized bureaucracy	Moderate bureaucratic structure
	Role of military	Weak military influence
	Political culture	Parliamentary representative democratic republic
	Administrative culture	Participative???
	Professionalism	Moderate
	Politicization of bureaucracy	Moderate
	Dominant state ideology	Secular state with a diverse religious population
Legal structure	Nature of constitution	Written
	Origin of constitution	1996, and approved by the constitutional court in civil government
	Strong constitution	South African constitution is one of the strongest constitution in the world, it frees from discrimination, inequalities to establish a rule based on, democratic values, rule of law, social justice, and fundamental human rights
	Constitutional rigidity Created by	Yes, requires special amendment procedures President Nelson Mandela /civil initiative

(continued)

Table 3 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Central government	Revised by bureaucracy	Promulgated by President Nelson Mandela on 18.12.1996 approved by the parliament
	Administrative judiciary system	Based British system and observed middle judicial effectiveness
	State structure	(Quasi) federal model
	Government structure	Parliamentary
	Hierarchical structure	Strong
	Local extension agencies	Limited to rural areas
	Central government	Yes & strong
	Coordinating mechanisms	Moderate existence of coordinating both internal and external systems
	Transparent financing system	Moderate transparent reporting– the need for improvement is observed
	Monitoring	Moderate
Local governments	Independent regulatory agencies	Exist
	Financial autonomy	Moderate
	Political autonomy	Moderate
	Council types	Municipalities–Mayor
	Mayors	Elected
	Decision-making bodies	Municipalities–office of the mayor exist weak
	Central tutelage/monitoring	
Intergovernmental relations	Subsidiarity principle	The Constitution of SA indicates this principle. For instance, the role of local government, and provincial government is secured by the constitution and that the national government may not interfere without any good reason and/or public interest. This view is line with subsidiary principle
	Decentralization type	Deconcentration
	Logic for division of tasks	Fair and rational
	Tutelage/monitoring	Moderate
Public personnel system	Communication	Moderate formal
	Civil services	Open merit-based system mostly career experience based
	Scope of civil services	The study observed that between 2009 and 2020, the number of civil servants increased from 1,780,553 to 2,108,125. This is an increase of 327,572 in 10 years
	Recruitment and promotion	Competitive, not political and fair enough

(continued)

Table 3 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>	
CSOs/civil society	Nationwide exam	National Senior Certificate (NSC) this exam is commonly known as the matriculation (Matric)	
	Politicization in general	Weak	
	Unionization	Moderate	
	Size of civil society	NGO, and International organization membership	
	Institutionalization	Strong	
	Partnership with the state	Moderate	
	Political pressure/domination	Weak	
	Major financial revenues	Membership fees, donations, fundraising activities, operating incomes, government, international donor support	
	Supportive national culture	Strong	
	Political regime & civil society relations	Moderate	
Reform philosophy	Civil society	Moderate role, but is seen as vital for good governance practices, democratization, and democratic stability in the country	
	Dominant reform paradigm	Governance reforms	
	Policy transfer	Policy adaptation	
	E-government reforms	Completed	
	Artificial intelligence (AI) reforms	Partial exist	
	Influence of international actors	South Africa is associated with emerging global actors such as BRICS. Thus, has the ability to exert regional and global influences	
	Recent reforms		<ul style="list-style-type: none"> – Developed e-government system – Developed an equitable and united education system—for instance, the department of education had been rationalized in to a single national department of education and nine provincial departments of education) and school safety policy has been adopted which links to the local police station in case of crime and/or violence – Back to basics program developed (this program aims to strength the capacity of municipalities) – Batho Pele principle developed (this principal guide government employee in their work with the public) – Anti-corruption reforms – Fiscal reforms – Center for public innovation modernized

Source Adapted and developed from Önder and Zengin (2022)

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Republic of Turkey

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I INTRODUCTION

In this chapter, we will examine Turkey's public administration from a comparative perspective, focusing on historical and recent developments. Turkey has a long administrative history in the classical meaning of administration, but its public administration tradition does not have a long history in the modern perspective.

Turkey is located mainly in Anatolia, Western Asia, and a smaller portion of East Thrace in Southeastern Europe. Thus, Turkey is a transcontinental country. Its population is 83.614.362 according to TURKSTAT on February 4, 2021. Its largest city is Istanbul, with an approximate population of 14.8 million people, and its capital city is Ankara (TURKSTAT, 2021). In the last published Human Development Index (HDI) report in 2020, Turkey is ranked 54th, with an HDI rank of 0.820. The Gross National Income (GNI) per capita in Turkey is \$27,201 (UNDP, 2021). Moreover, Turkey is the 19th largest economy in the world, with a Gross National Product of 766.430 (IMF, 2021).

Turkey is important to the comparative public administration discipline due to its long administrative and political history, and its strategic importance (Arslan et al., 2022; Islam, 2019, 2020, 2021; Islam et al., 2020, 2021;

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Nyadera & Islam, 2020b). It is valuable for its administrative structure influenced by both western and eastern cultures (Kutlu, 2006). Moreover, it is also a good example to observe the change in administrative structure of a government system that has changed from a parliamentary system to a presidential one.

Historically, the territory occupied by Turkey today was under the control of numerous ancient Anatolian civilizations during the Paleolithic times, such as Assyrians, Greeks, Thracians, and Urartian. The Seljuk Turks migrated to Anatolia in the eleventh century and started the Turkification process, which began with the victory of the Seljuks against the Byzantines in the 1071 Battle of Malazgirt (Metz, 1996: 14). During the fourteenth century, the Ottomans started uniting Anatolia and created an empire encompassing almost all of Southeast Europe, West Asia, and North Africa, becoming a major power in Eurasia and Africa during the early modern period. The empire reached the peak of its imperial power in the sixteenth century, especially during Suleiman the Magnificent's reign between 1520 and 1566. It lost its superiority over the European countries in the seventeenth and eighteenth centuries. In the nineteenth century, the Ottomans tried to emulate Europe's reforms, but they were unsuccessful. After they were defeated by Allied Forces in World War II, Mustafa Kemal Atatürk and his friends initiated the Turkish War of Independence against the invading Allies. It resulted in the abolition of the monarchy in 1922 and the proclamation of the Republic of Turkey in 1923 (Eisenstadt, 1984: 4–5). The Republic of Turkey was founded on October 29, 1923, by Mustafa Kemal Atatürk. He went on to become the first President of the Republic, and Ismet Inonu became the first Prime Minister (Axiarlis, 2014: 5). Atatürk enacted tens of reforms, which reflected Western political and social thought, philosophy, and customs integrated into the newly established Turkish Republic.

2 ADMINISTRATIVE HISTORY AND CULTURE

Turkish democracy has been interrupted by coups d'états, coup attempts, and memorandums. Apart from the 1960 and 1980 coup d'états, there have been three memorandums, and five different coup attempts in the history of Turkish democracy (Gözler, 2017). In addition to all of these, because of the terrorist activities of the PKK, which has been listed as a terrorist organization by NATO, the US, and the EU (EC & CEU, 2020), over 40,000 people in Turkey have lost their lives (MFA, 2021). Recently, on July 15, 2016, over 300 people were killed, and more than 2000 injured during a coup attempt. After the failed coup attempt, the government accused the Gülen Movement (FETO) as the coup's driving force (Presidency of Republic of Turkey, 2021a). A state of emergency was declared followed by a mass operation and arrests, including about 15,000 soldiers and 2,800 judges. In total, more than 100,000 people have been arrested or fired from their jobs on accusations of connections with the failed coup attempt and FETO (Bingol & Islam, 2016;

Gözler, 2017). The administrative development and transformation of Turkey have often been interrupted for all these reasons. However, it can still be stated that Turkey has a rich administrative history.

2.1 *Roots and Development of Administrative Tradition*

We can list many studies on the administration or administrative systems of Turkish states in history. We can first handle El-Medinetü'l Fazıla, in which Al-Farabi analyzed the ideal city or the virtuous city as an administrative body in the early tenth century (Özmen, 2014: 187). Secondly, we should mention Yusuf Has Hacib's Kutadgu Bilig, which means the knowledge of happiness (or rulership), which was written in the Karluk language of the Middle Turkic in the eleventh century (Adalıoğlu, 2013: 238). Thirdly, Siyasatnameh of Nizam al-Mulk is another work from the eleventh century that affected the Turkish administrative tradition, which means the book of government (Ekiz, 2010: 2). Besides all of these, there are many "politics (siyasetnames)" and "leaflets (risales)" of Turkish statesmen and philosophers throughout history (Önder, 2017). We can regard the risales of Vizier Lütfi Pasha (sixteenth century), Koçi Bey (seventeenth century), Defterdar Sarı Mehmet Pasha (seventeenth century), and Katip Çelebi (seventeenth century) as the most influential works for the development of Turkish administrative culture. The administrative system of Turkey arises from an understanding of these roots. The administrative texts of this period enabled both the influence of the Islamic and eastern culture to be seen in Turkish public administration.

2.1.1 *Ottoman Times*

The foundations of the public administration system of Turkey started to take place during the Tanzimat period. With the administrative reforms, which started with the Imperial edict of the reorganization of Gülhane, the Ottoman administrative structure changed, the religious effect in the face of military-civil bureaucracy declined, and some tasks in the public system were transferred to the civilian institutions (Dursun, 1992: 316). In this period, also known as the Westernization process, Ottomanism started to sprout with Islahat Fermanı (Edict of Reform), and the rights of non-Muslims in the country were expanded. The first and second Constitutional Era are the most important steps taken by the Ottoman State toward democratization (Kayalı, 1995: 265).

The first Constitutional Monarchy began on December 23, 1876, when the first written Ottoman-Turkish Constitution, Kanun-i Esasi, came into force. According to Kanun-i Esasi, the legislative and executive powers almost entirely belong to the sultan. Nevertheless, it was more of an administrative text than a constitutional one, which stipulates that the administration and civil servants should act in accordance with the legal rules (Güler, 2000). The positive point of the Constitution in terms of administration is that it states in Article 108 that provinces will be governed according to the principles of

decentralization and distribution of duty (Yayla, 1985: 181–182). The Second Constitutional Monarchy was proclaimed in 1908 and some amendments were made to the Kanun-i Esasi in 1909. Thus, the authorities of the sultan were reduced to a symbolic level, the constitution became more democratic, and as such administrative units were affected in the same manner.

2.1.2 *Republican Era*

The Republic inherited a strong administrative legacy from the Ottoman era. In the 1921 and 1924 Constitutions, which adopted the principle of unity of powers, the legislative and executive powers were gathered in the Parliament (Sencer, 1986: 101). Therefore, in the early Republic period the bureaucratic elite saw the state as a necessary entity to keep society together, as it did in the Ottoman period. (Heper, 1985: 50; Yalçındağ, 1970: 20–21). In the early Republican bureaucracy, the basic problems were unclear responsibilities regarding duty and patrimonialism. The most important aspect from its Ottoman heritage was the dual legal and governmental structure. In the early years of the Republic, efforts to eliminate the duality of the legal and administrative systems, establish new institutions, and transform the existing system gained priority (Tutum, 1994). A series of laws between 1923 and 1930 attempted the processes of transforming and reestablishing the system. The administrative structure formed in the early period of the Republic was very strict and centralized. During the foundation years, the Ottoman bureaucracy was taken over, except for the changes required by the new developments. By removing the negative aspects of the Ottoman administration, the Republic struggled to reform the state and regulate the economy. The bureaucracy grew and expanded its administrative duties (Eryılmaz, 2017: 148–149). Until the 1950s, when the administration was subject to academic research and experiments, the number of ministries and personnel increased, state initiatives called economic state enterprises increased the authority of the bureaucracy, and the salaries and personal rights of civil servants were legally guaranteed (Övgün, 2009).

Numerous studies have been carried out on administrative reforms in Turkey since the 1930s. Remarkably, World War II can be marked as the beginning of a new social structure for Turkey. In this new structure, social and political relations changed along with the functions of the state. The gradually weakening, centralized, normative, and tutelary structure began to erode considerably as a result of the world economic crisis of 1929. After the Great Depression, in the era of state capitalism, statism became the dominant policy in the country (Övgün, 2009: 33–35). Until 1940, Turkey successfully implemented the policies of state capitalism. However, between 1940 and 1945, the war economy was effective in the country, especially with the enactment of the laws of extraction tax, wealth tax, and national security. Boratav (2015) named those times as the incubation period of Turkish public administration. In the period of planned development that started after the 1950s, calls for reform in public administration had emerged as a result of the necessities and

urgencies stated before, then have never dropped from the agenda until today (Coşkun, 2005: 20; Polatoğlu, 2003: 2). The desire to restructure the public administration began to be expressed after the multiparty life and World War II.

The emergence of public administration as a field of scientific study in Turkey coincides with a series of important events (Keskin, 2006; Polatoğlu, 2001). The pre-1960 era consists of reports prepared by foreign experts. The first was the Neumark Report, which focused on qualitative inadequacy and imbalances in the public personnel system, inadequacy in salary, organizational disorders, and excessive paperwork problems (Neumark, 1949: 60). Secondly, the Barker report, prepared in 1950 by a World Bank committee, is considered the meeting point of Turkey with the public administration discipline (Emre, 2012: 71; Keskin, 2006). The Martin & Cush Report and the Leimgruber Report are some other examples (Gül & Aktel, 2004: 81).

By the 1960s, public administration reforms and planned developments gained more emphasis. In this period, the State Planning Organization (DPT) and the State Personnel Department (DPB) were established (Polatoğlu, 2001: 151). TODAIE (Public Administration Institute for Turkey and the Middle East) became an important center where administrative reforms were developed and conducted. The introduction of the five-year development plans since 1963 affected the regulations to be made in the administrative field as well as in the economy. Administrative reform initiatives began to be carried out within the framework of development plans and administrative reforms emerged from annual programs. From the 1960s to today, there have also been structural changes in Turkey's public administration (Kutlu, 2006). While the statist paradigm loses its influence, liberal and later neo-liberal paradigms have been influential in administrative reforms. New Public Management (NPM) reforms took place under Özal's government in the 1980s.

In today's Turkey, centralized bureaucracy is still strong and politicized, the military's role has significantly decreased (Zengin & Onder, 2020: 360), and the country's political culture preserves its conservative nature. Although a participatory administrative approach is recognized in theory, it remains weak in practice. On April 16, 2017, Turkey had a referendum for a change in the governmental system from a Parliamentary system to the Presidential one. With a rate of 51.4% yes votes, the people accepted the 18 proposed amendments to the Constitution (YSK, 2017). These changed the political structure and administrative system of Turkey.

2.2 *Legal Framework*

The Constitution of Turkey was drafted after a military intervention in 1982 by a mixed constituent assembly consisting of soldiers and civilians. Then, it was revised by civilian governments. With respect to articles 1 and 2 of the Constitution of the Republic of Turkey: "*Turkey is a unitary, democratic, secular, and social state governed by the principle of the rule of law.*"

The principle of jurisdictional dualism (administrative regime) is applied in Turkey. In other words, the administrative judiciary is a separate judicial branch. It was separated with the establishment of the Council of State in 1869 (Şenlen, 1994: 404). Since those times, matters concerning the administration have been dealt with by the administrative judiciary. While the first-degree judicial bodies of the administrative judiciary are the regional administrative courts, administrative courts, and tax courts, the higher judicial body is the Council of State (Gözler & Kaplan, 2016). The system of Jurisdictional Dualism is subject to many criticisms for holding the public bureaucracy in a strong position against the individual. The administrative jurisdiction branch was separated for the purpose of auditing the acts of the administration. Since it is obliged to deal with cases to which the administration is a party, it seems to favor the side of the administration. (Bonomo, 2019: 960).

The administrative structure of the country is handled under the five main articles in the Constitution. Article 123 states that the administration's organization and functions are based on the principles of centralization and decentralization. Therefore, two different principles are applied in the Turkish administrative system, and their reflection to practice is regulated by law. We should add the principle of subsidiarity, the distribution of power to local bodies under the control of the central government, in addition to these two principles.

Article 125 of the Constitution is about judicial review. The article states that judicial review shall be available against all actions and acts of administration, including the President. Therefore, the administrative judiciary system is strong in Turkey. Articles 126 and 127 are about the establishment of the administration in the country. Article 126 expresses that Turkey is divided into provinces based on geographical situation, economic conditions, and public service requirements in terms of the central administrative structure. Most significantly, it says that “*the administration of the provinces is based on the principle of devolution of powers.*” Unless the article regulating the central administration structure, Article 127 handles local administration structure on a large scale. It is said in the article that forming local administrative bodies is bound by the permission of the President for the purpose of performing specific public services. Another important point in the article is administrative tutelage, which is the power of the central administration over local administrations in the framework of principles and procedures set forth by law for ensuring the functioning of local services in conformity with the principle of integrity of the administration and meeting local needs properly (Keleş, 2011: 146–147).

In light of these articles and regulations, we can analyze the structure of public administration in Turkey. As we can see from Fig. 1, Turkey has a two-tier administrative system which consists of a central government and a local government. The central government is also divided into two different levels as capital departments and provincial departments with the purpose of devolution

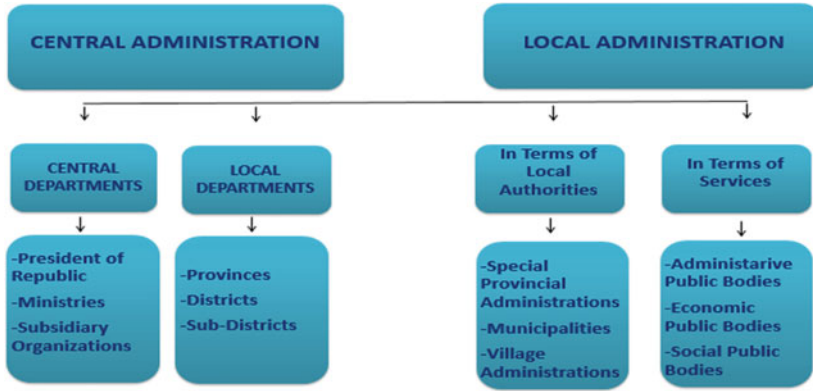


Fig. 1 The structure of public administration in Turkey

of powers. Then, the local government is divided into two groups in terms of services and local authorities.

3 CENTRAL GOVERNMENT

The Turkish public administration system is a unitary system of state. Therefore, the legislative, executive, and judicial powers gather in the central state. Public administration in Turkey is a complex system that has integrity among its units with its organizations and duties. Although public administration is divided into central government and local administrative units, there is a strict link between them. These units have relations of hierarchy and administrative tutelage (Eryilmaz, 2016). The hierarchical structure shows a strong feature. The central government consists of the President, ministries, and central and provincial bodies. It has two main levels, namely the capital and province. There are also independent regulatory institutions that provide counseling for the central government and assist in fulfilling their duties as the third level of central governmental organizations.

3.1 Capital Organization

The head of the capital organization is the President. The executive organ of the Republic had a dual structure before 2017. On one hand, there was a politically active and responsible Council of Ministers and Prime Minister, and on the other hand, a President who had no legal and political responsibility for his actions related to his duties. Now, the administration of the central government is wholly controlled by the President.

3.1.1 *President of the Republic*

Articles 101–106 of the Constitution of Turkey handle issues about the President of the Republic. However, the duties and powers of the prime minister and council of ministers were yielded to the President after the constitutional amendment in 2017 (Çalışkan & Önder, 2017). Also, some changes were made in Articles 101–106.

Article 101 (The President’s Candidacy and Election) states that “*the President shall be elected directly by the people from among Turkish citizens who are over forty years old and who have completed their higher education and eligible to be members of parliament...*” Article 104 handles the duties and powers of the President. Only the President, in conformity with the Constitution and laws, exercises executive power. With this responsibility, they represent the Republic of Turkey and the Turkish Nation’s unity. They appoint and dismiss vice presidents and ministers, accredit representatives of Turkey to foreign states and receive the representatives of foreign states appointed to Turkey, ratify and promulgate international treaties, represent the Office of Commander-in-Chief of the Turkish Armed Forces on behalf of the TGNA, decide on the use of the Turkish Armed Forces, remit or commute the sentences imposed on individuals on the grounds of chronic illness, disability, or old age, designate the national security policy and take the necessary measures, appoint senior public executives, dismiss them, and regulate the procedures and principles of their appointment by presidential decrees.

The President gained the power to issue presidential decrees in 2017, regarding only its executive power. Basic, personal, and political rights and duties in the constitution cannot be regulated by presidential decrees. The President can also issue bylaws to ensure the implementation of laws. The first presidential decree of Turkey, which was enacted on July 15, 2018, was about the President and the presidential office organization. According to Presidential Decree No. 1 (2018), the President is the only exerciser of the Republic of Turkey’s executive power. Therefore, with this first decree, Turkey officially became a presidential system.

3.1.2 *Vice Presidents*

The vice presidency is a new concept for Turkey. The President can appoint one or more vice presidents. They are appointed by the President from among those eligible to be a deputy in TGNA and are responsible to the President. The most significant function of the vice president is acting for the President. The Presidential Decree No. 1 states that, “*in the event of a temporary absence of the President on account of illness, travel abroad, or similar circumstances, the vice president shall serve as Acting President and exercise powers of the President.*” The first vice president of Turkey, Fuat Oktay, was appointed by President Erdogan on July 9, 2018.

3.1.3 *Ministers and Ministries*

Within the administrative structure of Turkey, there are ministers responsible for political affairs in each ministry. Each minister is responsible to the President and is also responsible for the public officials' actions under their command. In other words, the ministers are not only politicians but also public officials. As public officials, the minister is the head of the ministry, and the administrative operations within the ministry are carried out under the minister's supervision. However, the President is in a position to fulfill all the powers and duties previously performed by the council of ministers, the prime minister, and the President (Öztürk, 2019: 1279). Ministers are in the position of secretaries acting in accordance with the policies of the President in the new period. Unlike the parliamentary system in which the executive has two wings, ministers do not have the authority to sign in executive decisions (Polatoğlu, 2017: 8–9). In the new system, the understanding of professional management came to the fore and the authority of ministers as political figures decreased (Güzelsarı, 2019: 44–45). Ministers are appointed and dismissed entirely at the choice of the president. Most of them were chosen from among professionals, mostly experts in their fields, and representatives of the private sector. This shows that an implementation in line with governance has also taken place.

Ministries are important central government units as most of the administrative activities are carried out through ministries. The establishment, abolishment, duties, authorities, and organization of the ministries were regulated by Law No. 3046, dated 1984. As of 2018, following the presidential elections, the organizations and establishments of the ministries were reorganized and regulated in accordance with the presidential system and the number of ministries was reduced to 16¹ from 21. However, the number of ministries can be updated when more efficient public services or the organization of a new service is required. Ministries do not have their own legal personalities and are subject to the legal entity of the state. Each ministry has one or more deputy ministers who assist the minister and carry out administrative proceedings on and on behalf of the minister. Some ministries also have foreign and provincial organizations related to their areas of responsibility.

3.1.4 *Subsidiary Organizations*

There are various subsidiary organizations established in Turkey to assist the government and ministries, provide opinions on certain issues, and conduct audits. The most important ones are the National Security Council (NSC), the Council of State, and the Court of Accounts (Eryılmaz, 2016). They can

¹ Ministries of Justice, Labor Social Service and Family, Environment and Urbanization, Foreign Affairs, Energy and Natural Resources, Industry and Technology, Youth and Sports, Agriculture and Forest, Transport and Infrastructure, Interior Affairs, Culture and Tourism, Treasure and Finance, National Education, National Defense, Health, and Trade.

be viewed as the most important three subsidiaries because they are prescribed in the Constitution.

The NSC is a council that provides advice on national security issues. It is affiliated with the presidency office and the head of the board is the President. It considers national security issues from two perspectives, internal and external. The council's decisions regarding the existence and independence of the state, the integrity and indivisibility of the country, and the safeguarding of the peace and security of the society are primarily taken into account by the government. While the NSC had a say in the country's administration, it became an advisory board due to the presidential system (Acaray, 2020: 1317–1318). The NSC, which has been the carrier of military tutelage for many years with the strong influence of the country's military tradition, lost most of its powers due to the presidential system (Karabulut & Kutlu, 2020).

The Court of Accounts is responsible for inspecting all income, expenditures, and goods of the public administration and social security institutions under the central government budget on behalf of the parliament and making decisions about the accounts and transactions of the responsible persons and performing the inspection, supervision, and adjudication of the laws. It is stated in Law No. 6085 (*Law on Court of Accounts*, 2010) that the purpose of the Court of Accounts is to examine the accounts, financial transactions, and activities of the public administration and internal control systems, to provide information to the TGNA and the public regarding the budgets of the public administration, and to evaluate the performance of the administration out of strategic plans (Önder & Meydanlı, 2019).

3.2 *Provincial Organization*

According to Article 126 of the Constitution, the central administration is divided into the provinces, and those provinces are also divided into districts and sub-districts, depending on geographical situation, economic conditions, and public service requirements (Parlak & Doğan, 2018: 43). The province is the main organizing unit of the central government. There are 81 provinces and 923 districts in Turkey as of 2021. Turkey is also subdivided into seven regions, and these regions are divided into 21 sub-regions for geographic and economic purposes.

3.2.1 *Province*

The province is both the provincial unit of the central government and a local administration unit. As a central government unit, it is subject to the Provincial Administration Law No. 5442, dated 1949. As stated in the Constitution, the administration of the provinces is based on the principles of decentralization and devolution of powers. The stage at which authority is transferred is responsible for the administration of the province (Güler, 2009). The highest administrative chief in the province is the governor. The governor represents the state in the province as the supreme chief of all personnel working

in ministries and public institutions, except for the judiciary and military organizations.

Governors are exceptional public officials (Eryılmaz, 2016). They may have different professions in public since any special qualification is not prescribed in the law to be a governor. As of 2018, the power to appoint governors is given only to the President. However, as stated, the governor is not the only representative in the province because almost all the ministries and some central agencies have provincial offices. The governor has administrative superiority over all other provincial representatives.

3.2.2 *District and Sub-District*

A lower level of provincial administration is the district. The district governors are the head and the representative of the state in the district. District governors are under the hierarchical supervision of the governor. They are also appointed by the President, but as professional officers, career employees who do not have a political agenda. The processes of appointment, training, assignment, and relocation of district governors are bound by certain rules determined by law. According to Law No. 5442, the sub-district is an administrative unit consisting of towns and villages that are interrelated in terms of geography, economy, security, and local service. The district governor is the biggest government official and representative in the sub-district. However, sub-districts and administrative authorities were abolished in 2014.

3.2.3 *Regional Organizations*

The 1982 Constitution stipulated that regional organizations can be established to ensure the efficiency and harmonization of public services in one or more provinces. The functions and authorities of these organizations are regulated by law. In practice, it means that ministries and central institutions may form regional organizations. However, the region is not a provincial administrative level. The President determines the establishment and abolition of regional organizations and their participation in centers and regional directorates. The Ministry of Transport is the only institution that is organized at the regional level in Turkey (Eryılmaz, 2016: 158).

4 LOCAL GOVERNMENTS

Article 127 of the Constitution states: “*Local administrations are public legal entities established by election by the voters whose principles of the establishment are stated in the law and whose decision bodies are shown again in order to meet the local common needs of the provincial, municipal or village people.*” In short, in Turkey, local government units were established to carry out public services at the local level with their own public bodies, budgets, decision-making and executive bodies (Keleş, 2011: 22). Laws regulate the establishments, duties, and authorities of the local administrations. Although it is argued that the principle of local administration carries the meaning of local autonomy, it is not

the fundamental principle of the system in the unitary state structure of Turkey organized according to the principle of centralization. However, the existence of a center depends on the existence of the local. In this sense, it is necessary to deal with the concept of administration together with the principle of “the administration is a whole with its organization and duties” stated in Article 3 of the Constitution (Tortop et al., 2014: 78). The local administrations in Turkey are classified under two categories—local authorities and local services.

4.1 *Local Administrations in Terms of Local Authorities*

There are four types of local authorities in Turkey: Special provincial administrations, Municipalities, Metropolitan Municipalities, and Villages/Neighborhoods.

4.1.1 *Special Provincial Administrations*

When a new province is established, a special provincial administration (SPA) is automatically established with the new province. The SPA is the least developed and most controversial type of local government in Turkey because it was governed by the General Administrative Provincial Law issued in 1913 until 2005. The Special Provincial Administration Law, numbered 5302, was issued in 2005. The SPA is defined as a public legal entity with administrative and financial autonomy established to meet the people’s local and collective needs in the province (Keleş, 2011: 149; Tortop et al., 2014: 165). Its decision-making body is elected directly by the people. The area of duty of the SPAs is the entire province border. In this sense, they were established to bring public services to wider areas than municipalities. The governor is both the head of the provincial general administration and the head executive body of the SPA. However, these two units should not be confused with each other because the provincial general administration is the provincial extension of the central administration, while SPAs are local government units that have their own public legal entities, budgets, and decision-making bodies.

There are three organs of the SPAs: governor, general assembly, and provincial council. The duties of the SPAs are to create infrastructure for rural settlements and agricultural production, as well as physical infrastructure for education, health, and sports throughout the province. In 2014, the SPAs were abolished in 30 provinces where the metropolitan municipality statuses were established. Their functions were transferred to metropolitan municipalities. Today, SPAs continue to fulfill their duties in 51 provinces and cover a total area holding only 23% of the national population (TBB, 2021).

4.1.2 *Municipalities*

The term municipality is defined in Law No. 5393 (*Law on Municipality, 2005*) as “*A corporation established in the statute of the public legal entity having powers of self-government both administratively and financially, to meet*

the local and common requirements of the county inhabitants and the decision-maker of which is elected by the electors.” Municipalities can be established in any settlement where the population is over 5,000 and their organs are Municipal Assembly, Municipal Council, and Mayor. It is compulsory to establish municipal administrations in the provinces and districts. However, it is not allowed to establish municipalities in the drinking and utility water basins and other places under environmental protection and settlement areas at less than 5,000 m from any municipal boundaries.

The first foundation of the Turkish municipal system had its roots in the Ottoman Empire. As a result of the political and economic developments of the nineteenth century, a structural change occurred in the Ottoman cities, and new urban demands occurred due to an increasing urban population. However, many of the public services provided by municipalities today originated from this foundation. The Ottoman system inhabited Turkey with few changes. In the Republican era, municipalities were enacted in 1930. Actually, with the effects of the strong central tutelage on municipalities, the first law remained in effect for 85 years to be ultimately repealed in 2005. The number of municipalities stood at 421 in 1923 and increased to 3,225 in 2002. The historical evolution of the number of municipalities in Turkey can be seen in Table 1 (TBB, 2021). Moreover, the distribution of population to the municipalities can be seen in Table 2. It can be seen that the population is highly concentrated in the metropolitan municipal areas. Also, with the abolishment of the town municipalities within the metropolitan borders with the law numbered 6360, a decrease has been observed in the number of municipalities.

Table 1 Number of municipalities in Turkey

<i>Year</i>	1923	1950	1970	1980	1990	2000	2010	2017
Number of municipalities	421	628	1303	1727	2061	3225	2950	1397

TBB (2021)

Table 2 Types of municipalities in Turkey and their populations

<i>Type of municipality</i>	<i>Number</i>	<i>Population</i>
Metropolitan municipality	30	59,968,496
Metropolitan district municipality	519	
Provincial municipality	51	6,502,018
District municipality	400	4,815,668
Town municipality	397	1,218,925
Total	1,397	72,505,107

TBB (2021)

Powers, duties, and concessions of the municipalities are (Bayrakcı, 2018; Keleş, 2011: 243–245; Tortop et al., 2014: 325–330):

- Carrying out all kinds of activities and venture to meet the common requirements of the inhabitants of their municipal boundaries;
- Conferring upon the municipality, publishing regulations, implementing restrictive measures, imposing punishments within their limits of authority;
- Granting the permissions and issuing the licenses deemed necessary in the laws for real persons and legal entities;
- Imposing, assessing, and collecting taxes, levies, and participation shares;
- Supplying utility and industrial water and creating opportunities for the disposal of wastewater and rainwater;
- Establishing and operating all kinds of public transport facilities, including procurement of bus, sea, and water carriers and the construction of tunnels and railway systems within their boundaries;
- Carrying out all kinds of services related to the collection, transportation, decomposition, recirculation, removal, and storage of solid wastes;
- Determining, operating, and renting out wayside stations and parking places for vehicles on highway, land, road, street, square, and similar places.

The chief executive and representative body of municipalities are mayors. Mayors are elected for five-year terms. They cannot take part in the administrative and supervisory bodies of political parties during their terms of office. As the executive and advisory body of the municipality, the municipal council has the duties and powers of reviewing the budget, implementing expropriation decisions related to the work received on the annual work program, and giving the punishments foreseen in the law. Members of the municipal council are elected by the proportional representation system, while a simple majority elects the mayor (Keleş, 2011: 249). Finally, the third organ of the municipality is the Municipal Assembly. As the decision-making body, the powers and duties of the Municipal Assembly are to discuss and approve the strategic plan and investment programs, the budget and final account, and the provincial environment plan in provinces. The number of members of the assembly changes with respect to the population of the municipal area (Tortop et al., 2014: 337–338).

4.1.3 *Metropolitan Municipalities*

Metropolitan municipalities entered the Turkish local government system in 1983. It is a type of municipality, but it has more than one district within the borders of the municipality. Metropolitan cities show significant differences from other cities in economic, social, and cultural aspects because they spread

over a wide-range area. The first Law (No. 3030) that brings the establishment and operation of the metropolitan municipalities was enacted in 1983 to provide an authority to serve in the metropolitan areas. In 1983, Turkey's three largest provinces, Istanbul, Ankara, and İzmir became metropolitan municipalities. In the following years until 2012, the number of metropolitan municipalities had reached 16.

In 2012, Law No. 6360 was enacted and brought significant regulations in the Metropolitan Municipality system. The definition of the metropolitan municipality is enlarged as follows: "*The boundaries of a metropolitan municipality are the provincial borders, so they provide services within the provincial boundaries in a coordination between the district municipalities.*" Thus, metropolitan municipalities' borders were extended to the provincial borders, and new duties and powers were given to them. Also, the number of metropolitan municipalities increased from 16 to 30. It was also decided to transform provincial municipalities with a population of more than 750,000 into metropolitan municipalities. Their organs are the metropolitan municipal assembly as the decision-making body, the metropolitan municipal council as the advisory and regulatory body, and the mayor. The powers and duties of these bodies are similar to other municipalities, but they have authority over the metropolitan district municipalities, in addition to other authorities and duties.

4.1.4 Villages and Neighborhoods

Villages are the lowest units of local administration in the Turkish system. They are administered by Village Law No. 442 of 1924. The law defined the village as: "*The settlement unit whose population is less than 2.000.*" A village administration is formed in villages where at least 150 people live. The basic body in the village administration is the Village Assembly. This assembly composed of villagers over the age of 21, elects the village chief (Mukhtar) and members of the Elders Council. The mukhtars are the head of the village administrations and the head of the state in the villages. Their term of duty is five years between the local elections. Political parties cannot nominate mukhtars. All the mukhtars' operations are subject to the supervision of the district governor and the governor (Güler, 2009). The duties of the mukhtars of villages in the Metropolitan areas are quite diminished by the transfer of the main services to the metropolitan municipalities in 2012. The executive, supervisory, and decision-making body of the village is the council of elders (Tortop et al., 2014: 405). The village's budget is prepared by the mukhtar and the elder council, then approved by the district governor or governor.

With the law numbered 6360, villages within the boundaries of the metropolitan municipality transformed into neighborhood status (Bayrakçı, 2019, 109; Dik, 2014: 76). However, in the Turkish public administration system, cities were traditionally divided into neighborhoods, and neighborhood administration has been confused with local government. Although it has organs such as the mukhtar and the council of elders elected by the voters

living in the neighborhood, the neighborhoods don't have legal personalities (Güneş, 2009: 114). Although they have the same administrative order as the villages, they are organized under the municipalities and do not have the authority to govern themselves (Dik, 2014: 77).

4.2 *Local Administrations in Terms of Services*

Almost all countries with democratic administrative systems have autonomous public institutions apart from central and local governments. These institutions have emerged as a result of the principle of local administration or functional decentralization in the place of services. Therefore, they can be classified as a third group in the administrative units outside of both the central and local administrations. However, they are classified as local administrative units.

Firstly, administrative public institutions are established to provide classical public services in local areas, such as the General Directorate of Foundations and General Directorate of Forestry. Secondly, economic public institutions are established based on the authority explicitly provided by laws in economic activities, such as trade, industry, mining, agriculture, and banking. Such public institutions are gathered under the concept of "state economic enterprises (KITs)" in the Turkish Constitution. However, apart from the KITs, there are some other examples of economic public authorities, such as the Banking Regulation and Supervision Board (BDDK), Capital Markets Board (SPK), and Energy Market Regulatory Board (EPDK). Thirdly, social public institutions, like Social Security Institution (SGK), are established to meet people's social needs, such as social security, work, health, and retirement. Fourthly, scientific, technical, and cultural public institutions operate in science, technology, culture, arts, and higher education. Universities, Public Administration Institute of Turkey and the Middle East (TODAİE), The Scientific and Technological Research Council of Turkey (TUBITAK), and Turkish Radio and Television Association (TRT) are some examples of them. Finally, professional groups in the nature of public institutions are formed to meet the common needs of those who belong to a certain profession, facilitate their professional activities, and protect their discipline to improve themselves in line with their general interests. Examples of them include doctor's chambers, chambers of commerce and industry, agriculture chambers, and so on (Gözler & Kaplan, 2016).

5 CENTRAL-LOCAL GOVERNMENT RELATIONS

Turkey has complied with the European Charter of Local Self-Government with the expression "*Municipal services shall be provided to the public at the nearest possible locations and by the most appropriate methods*" in Law No. 5393. Local autonomy and subsidiarity have come to the forefront during the European Union candidacy process. However, the legal regulations about these principles have not been put into practice sufficiently (Yontar & Özer,

2018: 107–108). It has been observed that the central administration intervenes in the scope of local governments in many cases. In this context, subsidiarity and autonomy emerge as significant problems for local governments in Turkey. The administrative tutelage principle allows the central government to monitor local governments to ensure that local services are carried out in accordance to the principles of integrity, to provide unity in public affairs, to protect the interests of the community, and to meet local needs (Aydın et al., 2020). The subject of administrative tutelage is based on the law and is also limited by the law. It includes the powers of dissolution, ratification, postponement, and proposal, as indicated in the law, and does not have the power to rectify or to give orders and instructions. However, the scope of administrative tutelage makes it difficult to balance it with administrative autonomy (Keleş, 2011: 531–532). In short, local administrations have political, administrative, and financial autonomy but in a weak structure. Their weak financial autonomy makes it difficult to properly implement administrative autonomy because of the low proportion of self-income in their total revenues (Küçük, 2020: 111). Thus, the financial support of the central government increases the dependence of local governments (Ersoy, 1989: 60).

The relationship between central and local governments, albeit in different forms and densities, had a centralist, authoritarian and paternalist character throughout the republican period (Nyadera & Islam, 2020a). In other words, local governments were never allowed to establish independent policies without being under the strict control of the central government (Ersoy, 1989: 61). The local governments are the implementers of the policies in which the central government determines the framework. They are responsible for producing solutions for local problems as the closest administrative units to the public. This is also a right of local governments in the context of decentralization and autonomy principles as well as a responsibility (Küçük, 2020: 150). In this context, it is seen that the policies to be implemented in meeting local needs should be prepared by local governments together with local actors.

6 PUBLIC PERSONNEL SYSTEM

The share of public employment in total employment in Turkey is approximately 13%, which is below the OECD average (OECD, 2015). In Turkey, the public personnel system is based on four pillars. These four areas include administrative, military, academic, and judicial personnel. The basic characteristics of employment in these areas are different from each other. Therefore, they all have separate laws regarding their regulations. Moreover, Article 70 of the Constitution on public personnel system stipulates: “*Every Turkish citizen has the right to enter the public service. No criteria other than the qualifications for the office concerned shall be taken into consideration for recruitment into the public service.*” Thus, two vital principles in the Constitution are freedom and equality to work in public service. Arranging four fields with different laws is a

Table 3 Distribution of employment types in the public sector

<i>Employment Type</i>	<i>Total</i>
Civil Servant	2.449.538
Contractual Personnel	163.800
Workers	320.591
Temporary Personnel	20.363
Academic	128.277
Military	241.389
Judicial	17.400
TOTAL	3.341.358

On Birinci Kalkinma Planı (2019)

historical tradition of the country, and the principles of personnel management in these laws vary in terms of administrative, military, academic, and judicial staff (Güler, 2005a). Moreover, in recruitment, there are separate competition exams for each pillar. The distribution of public personnel according to the employment type is given in Table 3.

Law No. 657 (Law on Civil Servants, 1965) has been in force since 1965, although many provisions have been amended. It defined the public official as: “*The person who is assigned to carry out the public services that they are in charge of carrying out under the administrative law principles and rules of the state and public legal entities.*” According to the law, there are four types of employment in the public sector. These are civil servants, contractual personnel, temporary personnel, and workers.

Civil servants are public personnel who work in services that must be performed in line with general administrative principles and have undertaken primary and permanent roles. These basic and continuous tasks are policy determination, research, planning, programming, management, and supervision. Güler (2005a) defines the term civil servant as a person who is permanently linked to a public office by a cadre, has a defined position in a hierarchical order, has regular income from the state budget, and has the right to exercise public authority. Civil servants work under a status regime based on career, merit, and life insurance principles. Civil service is the basis of the public personnel system. Civil servants are recruited through a competition exam called KPSS (Public Personnel Selection Exam). The contractual regime is the type of work based on the job description rather than a career system, in which the staff has no status or life insurance. Contractual personnel are neither workers nor civil servants (Aslan, 2006). The temporary personnel are defined as contracted employees within the limits of wages and numbers specified in Article 4/C of Law No 657. Those who are subject to this status do not have as many rights and working conditions as contracted personnel. Finally, Article 4/D of Law No. 657 defined the workers as persons who are not included in sub-articles A, B, and C of Article 4. Besides, the provisions of

Law No. 657 are not applied to workers, and their employment in the public sector is carried out in line with Labor Law No. 4857.

Academic personnel are the staff working in higher education institutions. The Higher Education Personnel Law No. 2914, dated 1983, regulates monthly salaries, allowances, and other personal rights of academic staff. In cases where there is no provision in this law, the Civil Servants Law is applied with the Law on Higher Education No. 2547 (2000). Law No. 2547 defined academic personnel under three different classes. They are Teaching Faculty Members, Teaching Staff Members, and Ancillary Staff.

Employment of military personnel consists of officers, non-commissioned officers, expert officers, and military students in the Turkish Armed Forces Personnel Law No. 926 (1967). An officer is “*a soldier who has intentionally entered the Armed Forces according to a special law and can have the ranks from the officer to the general*” (*Law on Turkish Armed Forces Internal Service, 1961*). Accordingly, “*the non-commissioned officer is the military personnel who joins the Armed Forces according to a special law and can have the titles from the sergeant to the senior chief sergeant*” (*Law on Turkish Armed Forces Internal Service, 1961*).

Law No. 2802 (*Law on Judges and Public Prosecutors, 1983*) applies to judges and public prosecutors and administrative judges and prosecutors. Also, the Constitutional Court’s presidents, Supreme Court of Appeals, and the Council of State are subject to the provisions of this law. Judicial personnel consist of two main classes—judges and prosecutors. In the Turkish legal system, judges may serve as judicial and administrative judges. Judges are divided into two, one in the first instance court and one acting in the Council of State or Court of Cassation. It is not possible to switch between the judicial and administrative judiciary classes without an examination.

There are also judicial and administrative prosecutors in the Turkish judicial system. According to Law No. 2802 (*Law on Judges and Public Prosecutors, 1983*), prosecutors working in the judiciary are provincial and district chief public prosecutors, general prosecutors, public prosecutors, the Supreme Court of Appeals public prosecutors, and prosecutors in the central office of the Ministry of Justice. The prosecutor is the representative of the public order in criminal justice in the classical sense. The Chief Public Prosecutor of the Supreme Court of Appeals is also the Chief Public Prosecutor of the Republic of Turkey. There is no hierarchy between prosecutors and the Chief Prosecutor of the Court of Cassation.

The public personnel system has been an area reorganized by every government throughout the republican era. Therefore, it has many chronic problems. For Sayan (2016: 671–690), the public personnel system has six significant problem areas. The first one is the reorganization of the regulations regarding the public personnel field, which should be regulated by law, by decrees, or collective agreements. Thus, an unequal system has emerged by granting different rights to different civil servant statuses. Besides, because of those special reorganizations, the public personnel system has gained an unstable

image. The second is the merit problem in recruitment and appointments. Specifically, practices contrary to the merit principle, such as political preferences, encountered during the interview stages after the KPSS, or other written competition exams, and promotion stages have been unsolved for many years. The third is the irregularities that arise as a result of the confusion created by the strict staff policies and election-oriented employment policies. Staff planning and improvements in personal rights, which are used as election policies, cause excess personnel or inequality in personnel rights in the ongoing process. Fourth, the number of subcontracted personnel employed to provide cheap labor in the public sector is gradually increasing. According to labor force statistics (TURKSTAT, 2020), the number of subcontracted personnel corresponds to approximately 13% of the public sector. This situation creates problems in terms of personal rights such as job description, social security, and equality. The fifth is the employment of expert personnel, which creates injustice in terms of personal rights among public personnel. The fact that the expert personnel working in the central government organization does not differ from other public personnel with a clear distinction in terms of job descriptions creates unfairness. Finally, sixth is the lack of a valid performance evaluation system regulated by law. Although there are performance evaluation systems that have been attempted in some areas, there is not yet a performance evaluation system that can be taken into account in personnel appointment and promotion procedures or personnel rights regulations. There are performance evaluation systems that have been tried in some areas, such as the health sector. However, there is no performance evaluation system that can be taken into account in personnel appointment and promotion procedures or personal rights legislation.

7 CIVIL SOCIETY/NGO's

The roots of NGOs in Turkey can be found in the heritage of the foundations (Waqfs) in the Ottoman Empire. Waqfs were based on religious beliefs and philanthropy (Ayhan, 2019: 57). At the end of the nineteenth century, the Ottoman Empire met the modern forms of NGOs. However, in the Republic's early years, there was an organic relationship between the state and NGOs because the state used them as an ideological tool (İçduygu et al., 2011: 55). In 1945, with the Association Law, freedoms for civil society were enlarged and the number of associations and trade unions increased (Ayhan, 2019: 59). After the 1961 Constitution, civil society got stronger with the increasing unionization, the number of associations, unions, and chambers (İçduygu et al., 2011: 56). However, after the military coup in 1980, the military regime closed down more than 20,000 NGOs and restricted the remaining NGOs' activities. The new Law of Associations in 1983 prohibited NGO membership for public servants, and with this new law, the state obtained control over NGOs (Ayhan, 2019). Moreover, in recent times, in 2016, after the failed

coup attempt, about 1.500 NGOs were closed down for being found guilty of the attempt.

Despite all of these crises, the number of NGOs is still increasing in Turkey. However, Turkey ranks low among OECD countries in terms of NGOs per capita. There is one NGO per approximately 620 people in Turkey (OECD, 2015). In the country, foundations have approximately 1.2 million members, associations 11 million, and unions 2 million (6356 Sayılı Tebliğ, 2020; *On Birinci Kalkınma Planı*, 2019). There are about 72,000 paid employees and 120,000 volunteering staff in NGOs. Besides, the rate of volunteering over the age of 18 in Turkey is just 6% (İBÜ, 2019). Although there is a historically deep-rooted understanding of philanthropy in the country, it does not seem that way today. Çarkoğlu and Aytaç (2016: 14–15) found in their research that the average of donations made in a year in Turkey is approximately 228 Turkish Liras, which corresponds to 0.8% of GDP per capita.

There are 5 types of NGOs in Turkey with legal status as associations, foundations, unions, cooperatives, and professional organizations. The numerical distribution of these organizations is shown in Table 4.

In 2017, in Turkey, the income of associations was 17.6 billion TL and the income of foundations was about 8 billion TL (Önder et al., 2019). However, no study measures the shares of NGOs in the GDP. The income sources of NGOs in Turkey usually consist of membership dues, income to be obtained from the activities they can carry out according to their statutes, donations, assets incomes, revenues arising from the transfer, assignment, and sales of asset values.

Some other organizations show similar characteristics with NGOs, apart from legally defined ones. The most important example of them is think tanks. For the Global Go to Think Tank Report, the number of think tanks in Turkey is just 48 (McGann, 2019). Turkey is a country in which the think tank culture is still in the process of development and needs the impacts of think tanks in both public and politics for enhancing its democratic capacity (Karabulut, 2019).

Table 4 Types and Numbers of NGOs in Turkey

<i>Types of NGOs</i>	<i>Year</i>	<i>Number of NGOs</i>
Associations	2017	103.284
Foundations	2017	5.608
Unions	2018	2.717
Cooperatives	2012	84.232
Professional Organizations	2018	365

Ayhan (2019)

8 RECENT DEVELOPMENTS AFFECTING PUBLIC ADMINISTRATION

As a new changing system, reform movements have accelerated and diversified in Turkey. The reforms and innovations realized with the governance principles and the new government system are explained here.

8.1 Relations with International Organizations

Turkey is a member of many international organizations and even when it is not a member, it has continuing relations with several organizations. Turkey is a founding member of the UN, the OECD, the Organization of Islamic Cooperation, and the Organization for Security and Cooperation in Europe. It is also a member of the Council of Europe, NATO, WTO, World Bank, IMF, Black Sea Economic Cooperation Organization, and the G20. Finally, Turkey has been a candidate country in the EU since 1999. The relation of Turkey with the EU should be emphasized since the requirements of the EU membership have been influential in the administrative, political, social, and economic structure of Turkey since 2001, when the EU provided a road map for Turkey's accession process (Directorate for EU Affairs Turkey, 2021). During the process of adaptation, the administrative structure of Turkey has been renewed. Governance reforms, such as professional management in the public sector, the numerical representation of the success indicators of the services given to the public personnel and citizens, performance measurement, and result-oriented public services, are the EU Acquis outcomes in the Turkish administrative system. Besides, within this scope, the Municipal Law, the Metropolitan Municipality Law, the SPA Law, and the Basic Principles of Public Administration and Restructuring Law are the legislative outcomes of the EU on the local administration system. Until 2016, the negotiations had been progressively proceeding, especially with the effects of the European Refugee Crisis in 2016. However, in November 2016, the European Parliament voted to suspend accession negotiations with Turkey over their concerns on human rights and the rule of law, and accession negotiations were ceased. Relations deteriorated (European Parliament, 2021).

8.2 E-Government Development

There is no special law on e-government in Turkey. However, the Ministry of Transport and Infrastructure is responsible for preparing and implementing e-government principles and procedures in the country (Statutory Decree No. 655, 2011). The Central Population Administration System (MERNIS), which was originated in 1972, is the first e-government project of Turkey. It was not an e-government project at first, but it became an important step in e-government development (Şahin & Örselli, 2003; Yıldız, 2004). However, the system was implemented in 2000. Although there were many

e-government project initiatives between these years (İnce, 2001), this field's main development has taken place after the 2000s. Since the 2000s, many of the services of the ministries, state agencies, and public legal authorities have been provided online (Kutlu & Sevinc, 2010). Turkey has followed the e-government plans of the EU and developed its own strategies in accordance with the e-transformation plan (Kurfalı et al., 2017). In the latest UN E-Government Development Index (2020), Turkey ranked 53rd among 193. Apart from all this, Turkey also established an e-government gateway to gather services under one platform.

In 2002, the government initiated the Urgent Action Plan. The first design of the e-government gateway for Turkey took place in that plan with the E-Transformation project. Then, in 2008, "e-Devlet Kapısı," Turkey's e-Government gateway, was launched (Saylan, 2009). The E-Government Gateway of Turkey currently provides services to nearly all municipalities, ministries, public legal entities, public agencies, and companies online. However, in terms of both infrastructure and service provision, Turkey has not yet completed its e-government structuring. However, together with the presidential system, the Digital Transformation Office of the Presidency of the Republic of Turkey was established by Presidential Decree No. 1 *"to collect the fragmented activities regarding digital transformation, cybersecurity, national technologies, big data, and artificial intelligence under a single roof in line with advancing technologies, social demands, and the reform trends in the public sector"* (Presidency of Republic of Turkey, 2021b).

8.3 Recent Administrative Reforms

The new right-oriented policies adopted by Turgut Özal's government in the early 1980s enabled the NPM approach to be effective in Turkey (Özer, 2019: 31). Especially since the 1990s, efficiency, effectiveness, competition, quality, privatization, liberalization, transparency, entrepreneurship, accountability, decentralization, performance, power-sharing, and strategic planning concepts have started to significantly take place (Eryılmaz, 2017: 250). Turkey carries out reform studies in cooperation with international organizations, especially the EU, World Bank, and OECD, to achieve these goals and improve efficiency and productivity in public services (Süslü et al., 2019). The governance reforms were included in the "Transition to a Strong Economic Program" for Turkey's first time. Then, beginning with the Urgent Action Plan in 2002, AK Party governments have included governance reforms in their government plans (Güler, 2005b). In 2000s, amendments regarding the governance principles have been made in many laws such as Metropolitan Municipality Law, Municipal Law, Special Provincial Administration Law, Public Financial Management and Control Law, and Law on Right to Information (Dilaveroğlu, 2020). Thus, there have been many institutional reform initiatives for restructuring public administration in these years. The privatization, quality, and liberalization reforms observed in the period that NPM

was dominant were replaced by digitalization, participatory democracy, and specialization reforms in the new period. Independent administrative authorities, city councils, regional development agencies, ethics committees, and Ombudsman institutions are examples of institutions established in Turkey within the framework of governance reforms. As a prominent example, an Ombudsman Institution was established to investigate and propose all kinds of actions, procedures, attitudes, transactions, and behaviors of the public bodies in accordance to the principles of human rights, justice, and equity (Doğan, 2017: 269). As another example, the Personal Data Protection Authority of Turkey was established as a requirement for being a state that respects human rights (Sevinç & Karabulut, 2020: 451).

9 CONCLUSION

The public administration system of Turkey, which is explained under the main headings in this chapter, is briefly summarized in Table 5. In Summary, Turkey, as a country with a strategic geopolitical situation, has a bureaucratic tradition dating back to the imperial period. And it still constitutes a strong centralized bureaucracy. Nevertheless, it managed to reduce the role of the military, which had a considerable influence on the administration in the past. While its political culture has a conservative character, its administrative culture was designed in a participatory manner. Although the dominant state ideology is secular, religious effects are felt in the administration. The biggest reason for this is that the bureaucracy has politicized. Finally, professionalism has been realized at a certain level, but it has not been fully achieved yet.

The Constitution of Turkey is written, strong, and rigid. It was prepared by a mixed assembly consisting of the military and civilians in 1982 and revised by civilian governments. Turkey has also adopted the administrative regime as the administrative judiciary system.

Turkey has a unitary state structure and a presidential government system. Its hierarchical structure shows a strong character. Its central government is divided into two branches as the center and province. Therefore, it is highly extended to the local areas. However, its coordinating mechanisms are not strong, and the financing system is not transparent enough.

The local governments are governed by Mayors, who are elected by the people for five years period, but their decision-making bodies are councils. Despite the existence of the subsidiarity principle, local governments could not gain autonomy due to the strong administrative tutelage. In short, local governments have weak political, administrative, and financial autonomy in Turkey.

In Turkey, although the public personnel system usually has a career-based structure, the number of contracted personnel has been increasing in recent years. However, the prestige of being a public employee maintains its value in the eyes of the public. In Turkey, 13% of the total employment is covered by the public sector. This employment is based on a country-wide competitive

Table 5 Main features of Turkish Public Administration System

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
Administrative History	Geopolitical situation	Strategic
	Colonial history	No
	Legacy of bureaucracy	Empire
	Centralized bureaucracy	Strong
	Role of military	Moderate military influence (too strong in the past)
	Political culture	Conservative
	Administrative culture	Participative
	Professionalism	Moderate
	Politicization of bureaucracy	High
	Dominant state ideology	Secular
Legal Structure	Nature of constitution	Written
	Origin of constitution	1982/Coup d'état
	Strong constitution	Yes
	Constitutional rigidity	Yes
	Created by	Military
	Revised by bureaucracy	Civil initiative
	Administrative judiciary system	Moderate
Central Government	State structure	Unitary
	Government structure	Presidential
	Hierarchical structure	Strong
	Local extension agencies	High
	Central government	Yes & strong
	Coordinating mechanisms	Moderate
	Transparent financing system	Weak
	Monitoring	Weak
	Independent regulatory agencies	Exist
Local Governments	Financial autonomy	Weak
	Political autonomy	Weak
	Council types	Council & mayor
	Mayors	Elected
	Decision making bodies	Councils
	Central tutelage/monitoring	Strong
	Subsidiarity principle	Exist
	Decentralization type	Devolution
Intergovernmental Relations	Logic for Division of tasks	Political strong
	Tutelage/monitoring	strong
	Communication	Moderate & Formal
Public Personnel System	Civil services	Mixed but Career-based dominated & Prestigious

(continued)

Table 5 (continued)

<i>Themes</i>	<i>Subthemes</i>	<i>Situation/Explanation</i>
CSOs/Civil Society	Scope of civil services	%13 of total employment
	Recruitment and promotion	Partially competitive & open to political interventions
	Nationwide exam	Exist
	Politicization in general	Strong
	Unionization	Moderate
	Size of Civil Society	NGO membership: Approximately 14 Million People (%18 of total population)?? Volunteering rate: %6 % of GDP: NA Employment: About 72,000 (%0.09 of total population) paid employees and 120,000 (%0.15) volunteers
	Institutionalization	Weak
	Partnership with the state	Weak
	Political pressure/domination	Moderate
	Major financial revenues	Membership fees, operating incomes, government supports, donations, and fundraising activities, rents
	Supportive national culture	Weak
	Political regime&civil society relations	Moderate
Reform Philosophy	Civil society	Prestigious
	Dominant reform paradigm	Governance reforms
	Policy Transfer	Policy adaptation
	E-government reforms	Not completed
	Artificial intelligence (AI) reforms	In preparation
	Influence of international actors	EU Accession Negotiations Refugee Crisis
	New reforms (5 years)	Ombudsman Institution, Personal Data Protection Authority, New administrative structure of presidential system, Digital Transformation Project, Information Society Strategy and Action Plan

Source Adapted and developed from Önder, M., & Zengin Ü. N. (2022). A framework for comparative analysis: Public administration across the globe. In M. Onder, I. N. Nyadera & M. N. Islam (Eds.), *The Palgrave Handbook of Comparative Public Administration: Concepts and Cases*. Springer Nature Palgrave Macmillan

examination. However, the spoils system and politicization in the public sector still maintain its strength.

Considering the history of its foundation, Turkey has a long history of civil society. However, it cannot be said that it is a country where civil society is strong today. The membership rate of individuals in NGOs is low, the state's relationship with NGOs is weak, and the financial income of NGOs is low. For these reasons, NGOs in Turkey have remained weak in terms of institutionalization.

Governance reforms are the dominant reform paradigm in Turkey. Within the scope of governance reforms, digital transformation and information society reforms have been emphasized in recent years. Although it has not yet completed the e-government development, new steps have been taken in many areas, especially in artificial intelligence and cybersecurity with the establishment of the digital transformation office. The most important events affecting these transformations in the country have been EU Accession Negotiations and the European Refugee Crisis.

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Comparison of Country Cases and Future Trends of CPA



Cross-National Comparison of Public Administration Systems: Selected Cases Across the Globe

Murat Önder, Israel Nyaburi Nyadera, and Md. Nazmul Islam

I INTRODUCTION

This chapter intends to provide comparison of selected country cases' administrative systems: structures, processes, and functions based on the framework provided in Chapter 4. Each country's administrative system was written by native (mostly) country specialist/s and researcher/s on comparative studies. Each country's case chapter was designed to illustrate and explain a machinery of governments in terms of structures, processes, functions and behaviors in depth. However, this chapter is more than a description of a specific government but aims to compare countries' public administrations in terms of their administrative culture, structures of central and local governments, civil services, civil society, and administrative reforms voyages. We aim to

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create a platform for theoretical and practical comparisons between institutional structures, their historical development, and functions by considering main similarities and differences without ignoring unique traits (Onder & Saygili, 2018).

We cannot fully understand the social and governmental structures of any country, unless we have knowledge of others (Chandler, 2014: 2) even if we can know basic structures and functioning in detail via individual case studies. To understand and infer general principles about functioning and institutional structures, we need to know which ones are more efficient in providing public services, more ethically sound, more democratic, humanitarian, fair, change-oriented, etc. Additionally we can find the ideal/perfect looking public administration systems in the papers, policy documents, and theory but not in reality. The gap between theory and practice is often wider in developing countries compared to developed countries. In this way, we can learn which country's administrative system such as Russian, American or Turkish governments are more or less efficient and more or less democratic. Rather than understanding more or less of any phenomenon in any comparative country study, scientific knowledge production requires to consider the extent that we can infer general principles. Early scientific management movement and classical organizational theories were in line with this approach to find general and nomothetic principles of administration (Meier, 2015; Riggs, 1962) what Simon (1946) calls proverbs of administration. Many scholars evaluate this paradigm as result of the heavy impact of positivism (Neuman, 2014). On the other hand, qualitative methodologies assign significant values, unique attributes (Brower et al., 2000) coming from the historical, social, political contexts. We can possibly detect most sound and unique administrative systems within the context of a particular national culture. Therefore, we cannot propose one size of administrative outlook that fits all (Chandler, 2014: 229; Heady, 2001; Tödtling & Tripl, 2005), so we suggest highlighting the contingency and contextuality.

This book and country case chapters are designed to be a comparative study. Each author presents a country case chapter with a common format to make it easier to compare one country with another. Even though we do not claim to be a fully comparative analysis in the sense that the chapter authors do not make any general theoretical inferences regarding similarities and differences, we still have some tentative hypotheses to test depending on the data set we created from country case chapters. The measurement of variables and the codification were done by country chapter writers based on the comparative framework check list. Likert type of scale has been used. Also we have used international data set variables about the countries. This chapter aims to provide the most appropriate structure to show how each particular country or administrative system differs or is similar to others in a given comparative framework. Some of these very common general topics are: administrative history of a country, central and local governments, public finance management, intergovernmental relations, civil services systems, civil

society or nongovernmental organizations, continuous reforms of systems, and reforms of philosophies (Önder & Ayhan, 2020).

1.1 *The Impact of Globalism*

Globalization and transnational interactions and pressures exerted by external forces have made comparative study more significant than before. The demands of marketization, globalization, democratization, and civil society have dramatically changed the nature of public administration across the globe. Advanced technology dominated developments such as machine learning, artificial intelligence, big data, communication/internet technologies, and social media simplified and transformed the mode of communication and work processes among people and governments. The new global administrative system also demands a huge global bureaucracy characterized by extreme diversity, extensive complexity, and significant interdependence (Bapuji & Rao, 2001: 583). Economy, technology, and broad-based globalization have also altered the context of public administration and necessitates a reexamination of many of its premises and tenets (Jreisat, 2005: 236). While there are some common factors which may transcend the political, economic, and social contexts of local and national administration (Önder & Nyadera, 2020a), there are certain many other important factors which are shaped by international economic situations (Rathod, 2007: 4; Önder & Zengin, 2022).

The convergence hypothesis assumes that forces such as internalization and globalization will be the main external determinants in countries' public administration systems. National structures, which until this point have varied widely along with their historical defining factors, will lose more and more impact in the face of this determinism and will yield to an institutional, cognitive, and normative alignment in time. The convergence hypothesis is also sustained by rational choice theory and its derivatives in New Political Economics and the economic theory of bureaucracy (Kuhlmann & Wollmann, 2014). On the other hand, the divergence hypothesis argues that—irrespective of the influence of globalization forces—institutional, cultural, and normative factors have a continuing determinative effect on any nation's public administration system (Nyadera & Islam, 2020). This paper strives to benefit by using both convergence and divergence hypotheses in comparative analysis of public administrative systems across the countries.

2 ADMINISTRATIVE HISTORY

The administrative history of any state or country covers political and administrative culture, administrative tradition, and emergence and development of bureaucracy and legal framework. Administrative institutions in every nation have a specific development process and history that shape the institutionalization of organizing systems in the country. Unique characteristics that are evident in a country's natural political and administrative development are

highly influenced by their setting (Önder & Nyadera, 2020a: 284). Organizations imitate environmental elements surrounding them (Parsons & Shils, 2007). All these ecological factors, also shaped by past experiences, influence institutionalization of public administration (Riggs, 1980). Historical institutionalism warns that ignoring historical context may limit our understanding and ability to compare nations' current situations (Thelen, 1999). For example, colonial or imperial past can directly or indirectly affect the administrative tradition of a country.

Colonial Legacy: D. North (1990: 98) defines path dependency as a process that constrains future choice sets. The concept of path dependency is valuable in understanding issues such as the development and constraints. The concept has been criticized with various aspects, but it is still used by many scholars because of its power in explaining intuitions which are regarded as constraints (Ostrom, 1999). Dependency theories argue that inefficiencies or practices may persist in a path-dependent processes and policies (Kay, 2005: 567; Peters et al., 2005). Path dependence often has a restrictive and conserving effect entailing prolongation if not the perpetuation of existing institutional trajectories (Kuhlmann & Wollmann, 2014: 280). Therefore, colonized countries had very hard time to get out of being underdeveloped and only few countries like South Korea got out of that loop in the history (Jreisat, 2012). They became addicted to the system they are given rather than creating their own. Therefore, in transferring the policies they keep adopting rather than adaptive or being innovative (Coombs & Hull, 1998). In our study, we have found that there is a significant relationship between colonial history and policy transfer approach. Countries with colonial history have a tendency of policy adoption or adaptation approach rather than being innovative (Table 1).

Borrowing from path dependency approach, we also checked human development and government efficiency score by comparing those with colonial history. We have also found statistically significant negative relationships between colonial history and human development index ($P < 0.05$, $R^2:0.20$, $B: -0.451$, $n:20$), and government efficiency score ($P < 0.01$, $R^2:0.40$, $Beta:$

Table 1 Policy transfer types by colonial history

<i>Policy transfer type</i>	<i>Colonial history</i>		<i>Total</i>
	<i>No</i>	<i>Yes</i>	
Policy adoption	1	7	8
Policy adaptation	2	4	6
Innovative	4	2	6
Total	7	13	20

$P < 0.10$, Spearsman Correlation: -0.464 , $P.Chi^2:4432$, $n:20$

-0.633, *n*:20). Countries with colonial history has less human development scores and government efficiency scores on average.

2.1 Political Culture

The concept of political culture has become a key factor in differentiating any country’s political system from others. Political culture reflects the values, attitudes, orientations, myths, and beliefs that people have about politics and government, particularly about the legitimacy of government and their relations to government (Islam et al., 2021; Önder & Nyadera, 2020b; Islam, Bingöl & Nyadera, Islam, Bingöl et al., 2020a; Islam, Önder & Nyadera, Islam, Önder et al., 2020b). Political culture is assumed to have a major impact on the direction of national political development, and numerous formulations have been offered classifying political systems in relation to the political cultures nurturing them (Heady, 1998: 96). Here we provided our sample of countries in groups according to their political culture which we had adopted to examine its impact on the specific countries’ bureaucracy, civil service, civil society, and reforms (Table 2).

Administrative culture: Administrative culture may be thought of as general characteristics of public officials (i.e., shared values, attitudes, beliefs) in different levels and sectors of government (Henderson, 2004: 236; Önder & Nyadera, 2020b). Jreisat (2009: 37–39) emphasizes that these norms and values should shape and influence bureaucratic attitude, interpersonal relationship, and performance of public officials. Administrative culture is related to the broader political culture, from which it derives, and can be further discussed in terms of sub-cultures. Henderson (2004: 234) argues that administrative culture has been overshadowed with organizational and political culture. However, we include administrative culture in our book to compare public administration and their practices across the selected countries. There are variety of ways to measure administrative culture in different countries. In this study we tried to look at participatory role military, politicization, and hierarchical aspects of administrative culture of first, we begin by grouping the countries according to their citizens’ participation levels as shown in Table 3.

Table 2 Political culture by the countries

<i>Attitude</i>	<i>Very conservative</i>	<i>Conservative</i>	<i>Neutral</i>	<i>Liberal</i>	<i>Very liberal</i>
Countries	China, Egypt Saudi Arabia Pakistan Iran Russia	Cuba India Malaysia Israel South Korea Turkey	Brazil	South Africa Nigeria	France Germany Japan UK USA

Table 3 Administrative culture by the countries

<i>Participation</i>	<i>High</i>	<i>Moderate</i>	<i>Low</i>	
Countries	France Germany Israel Japan UK, USA	Brazil Malaysia South Africa South Korea Turkey	China Cuba Egypt India Iran	Nigeria Pakistan Russia Saudi Arabia

Table 4 Role of military by the countries

<i>Influence of military</i>	<i>Military dominant</i>	<i>Moderate</i>	<i>Low</i>	<i>No influence</i>
Countries	Egypt Cuba China	Brazil Iran Nigeria Pakistan Turkey	India Iran Israel Malaysia South Korea Russia	France Germany Japan Saudi Arabia South Africa UK, USA

As being embedded in national culture, administrative culture carry some traits of general culture on it. We found that countries with high power distance culture have lower participation in administrative process ($P < 0.01$, $R^2:0.50$, Beta: -0.71 , $n:20$). It seems that as power distance increases, participation declines.

Role of military: Military hierarchy has huge impacts on organizing structure and has been discussed in administrative theory (Shafritz et al., 2016). Role of the military not only has general implications regarding organizing the structure of public organizations, but also our findings show that in cases of high military influence, they interfere in policy making processes. Table 4 looks at the military role in policy making processes among the selected case studies and reveals significant military influence on political and administrative affairs among developing countries.

Bureaucracy is known as one of the oldest institutions of government and administration in history. Bureaucracy has its roots in the ancient world, playing an impressive role in administrating great empires and civilizations (Farazmand, 2009: 1). Bureaucracy was the main focus of comparison (Heady, 2001) in comparative public administrations and comparative politics. However, bureaucracy is a very general term used for anything from minimal “red tape” to maximalist approaches to “public administration.” The term bureaucracy is used to denote national administration, and any country’s bureaucracy is its national administrative system in its present forms and functions (Jreisat, 2012: 62). Utilizing bureaucracy as a comparative unit means improved ability to generate middle-range hypotheses for testing within one

Table 5
Professionalization of bureaucracies

<i>Professionalization</i>	<i>High</i>	<i>Moderate</i>	<i>Low</i>
Countries	France Germany India Israel Japan South Korea USA, UK	Brazil China Iran Malaysia Russia South Africa Turkey	Cuba Egypt Nigeria Pakistan Saudi Arabia

Table 6 Politicization of bureaucracy by the countries

<i>Politicization of bureaucracy</i>	<i>High</i>		<i>Moderate</i>	<i>Low</i>
Countries	Brazil China Cuba Egypt Iran	Nigeria Pakistan Russia Saudi Arabia	France Germany India, Israel Malaysia South Africa Turkey	Japan South Korea USA UK

or more countries, because all countries have a bureaucratic system with more or less similar structural characteristics (Jreisat, 2012: 65).

Professionalization of bureaucracy: Weber’s ideal type of (2017) bureaucracy emphasizes professional management, specialization, hierarchy, impersonality, working for pay, system of rules, standard job and task orientation, duties rather than persons, strict control and written records and communication, and recruitment process based on merit. In our findings, as illustrated in Table 5, we grouped the bureaucracies of countries according to their professionalization.

Professionalization of bureaucracies in developed countries seems to have strong positive government efficiencies. We have found out that more professional bureaucracies have better governance efficiency scores¹ ($P < 0.01$, $R^2:0.38$, $F:11,132$, $Beta:0.618$, $n:20$).

2.2 Politicization of Bureaucracy

Existing literature in bureaucracy and public administration show that there is a growing challenge of politicizing public sector especially in appointments of senior government officials (Kim & Hong, 2019; Lee, 2018). Interestingly, both developed and developing countries face the problem of politicization. With this realization in mind, we have created Table 6 which focuses on the

¹ Governance efficiency scores 2020 from <https://solability.com/the-global-sustainable-competitiveness-index/the-index/governance-capital>.

Table 7 The influence of political culture on politicization of bureaucracy

<i>Politicization of bureaucracy</i>	<i>Political culture</i>					<i>Total</i>
	<i>Very conservative</i>	<i>Conservative</i>	<i>Neutral</i>	<i>Liberal</i>	<i>Very liberal</i>	
Low	0	2	0	0	2	4
Moderate	0	5	0	0	2	7
High	5	2	1	1	0	9
Total	5	9	1	1	4	20

$P < 0.05$, Spearsman Correlation: -0.534 , $P.Chi^2:14,559$, $n:20$

level of politicization of bureaucracy. We identify three levels of measurements, high, moderate, and low.

Bureaucracies in developed countries seem to be less influenced by politicization. We have found out that political culture has significant impact on countries’ politicization of bureaucracies.

We also establish that there is a relationship between political culture and politicization of bureaucracies. Looking at levels such as very conservative, conservative, neutral, liberal, and very liberal, we find that very conservative political cultures have higher levels of politicization of public sector as illustrated in Table 7.

2.3 *Legal Structure (Constitutional Framework)*

Legal structures of country cases provide a brief account of the central decision making structures of government as explained in the constitutions. All countries have a constitution in a detailed written format or as general broad rules. UK, Israel, and Saudi Arabia do not have written separate constitution. Most constitutions are not very flexible and might not be amended by simple majorities especially in federal democracies. “How constitutions distribute power among different branches?” is the main question necessary to understand the boundaries of legislative, executive, and judiciary powers. Division of power between central bureaucracy, federal, and local governments is explained (Chandler, 2014: 9) by a country’s top level document—its constitution. Continental European tradition has separate strong administrative judiciary systems while Anglo-Saxon tradition does not have separate administrative judiciary system.

3 CENTRAL GOVERNMENT

There are many ways in which a system can be organized and run; administration systems exhibit a variety of formal governmental institutions, like legislatures and courts, as well as political party and interest group systems.

Parts of the administrative tradition of a country include: the executive-legislative relationship, whether they use a written or unwritten constitution, whether the constitution is flexible or rigid, and the electoral system used to form the legislature and executive (Lijphart, 1999: 1–5). Forms of government may be classified according to the scope of central administration as unitary, federal, and confederate systems (Song, 2000), or can be grouped according to the relations between branches of government, parliamentary, presidential, and semi-presidential systems. Some governments concentrate all of the three powers at one point in the center, while some other governments disperse power among member states or sub-governments.

Although central governments as an administrative apparatus do not make policy, they play a crucial role in implementation, advice, support, and facilitating policy making. Proper administrative support is essential for good policy making that has criteria of discipline, stability, transparency, and selectivity. Organizational architecture of government changes according to political systems and culture of a country. Countries still try to allocate government functions and work of governments rationally in an efficient way by considering non-fragmentation, homogeneity, non-overlap, and span of control (Schiavo-Campo & McFerson, 2008: 72–75). While some countries prefer ministries, some use department for similar top level organizing. They might have different number of ministries or departments, but similar functions for effective and efficient governments. Our study finds that there is a correlation between high power distance countries and centralization degrees of bureaucracies. Additionally, developing countries tend to have higher centralization degrees as illustrated in Table 8. These countries have also stronger military influence in their administrative systems.

Chandler (2014) highlights the significance of financing systems of the states in comparative public administration. As a public organization, departments of central governments cannot be given complete power over their financial resources without independent means of monitoring and checking mechanisms to maintain the use of public resources for public good (Chandler, 2014: 4). Some significant items that need to be considered to understand the structure and functions of central government are: bureaucratic structures, organizing, and coordinating systems at the central level, ministries,

Table 8 Centralization degrees by the countries

<i>Centralization</i>	<i>High</i>	<i>Moderate</i>	<i>Low</i>
Countries	China, Cuba Egypt, Iran Malaysia Nigeria Pakistan Russia, Turkey Saudi Arabia	Brazil France India Israel Japan South Africa South Korea	Germany UK USA

agencies or departments, local organizations of central governments, independent agencies, and recent reforms in central governmental issues. Any analysis should include accountability, openness, effectiveness, and democratic participation not only in democratic systems in terms of elections but also their existence and value in administrative systems.

4 LOCAL GOVERNMENTS

An approach to local government typology is based on decentralization types since decentralization is a main feature of local government. The purpose of the formation is to assure participation, local interest, and demands. Haque (2012) identified that scholars have divided across diverse typologies of local government decentralization as deconcentration, delegation, devolution, and privatization. Functional (a vertical division of tasks, scope of tasks, financial autonomy), political (local leadership, citizen participation, central-local relations), and territorial (size, units) profile of local governments (Kuhlmann & Wollmann, 2014) offers insightful analysis of comparative local governments. Local administrative units (general historical development, statistical data) and administrative structure of local government, organs of local authorities, financial structure of local governments, and auditing of local authorities have been explained in the country’s case studies. General structures of local administrations look similar but practices may change according to the social and political context of the countries. Table 9 classifies the levels of local government autonomy as either low, moderate, and high.

We have found out that political culture has significant impact on countries local autonomies financially and politically ($P < 0.01$, Spearsman Correlation:0.744, P .Chi2:27,071, n :20). Countries that are either very conservative or conservative as per our political culture classification experience low local government autonomy. On the other hand, countries that are either liberal or very liberal have high levels of autonomy as shown in Table 10.

The USA and some Anglo-Saxon countries have professional CEO-like manager appointed among professional managers from competitive job markets by the elected boards rather than electing city managers/mayors (Önder & Köylü, 2018).

Table 9 Local autonomy by the countries

<i>Local autonomy</i>	<i>Low</i>	<i>Moderate</i>	<i>High</i>
Countries	China, Cuba Egypt, Iran India, Malaysia Nigeria, Pakistan Russia, Saudi Arabia	Israel Japan South Africa South Korea Turkey	Brazil Germany UK USA France

Table 10 Local political autonomy * political culture

<i>Local political autonomy</i>	<i>Political culture</i>					<i>Total</i>
	<i>Very conservative</i>	<i>Conservative</i>	<i>Neutral</i>	<i>Liberal</i>	<i>Very liberal</i>	
Weak	5	5	0	1	0	11
Moderate	0	4	1	0	0	5
Strong	0	0	0	0	4	4
Total	5	9	1	1	4	20

$P < 0.01$, Spearsman Correlation: 0.744, $P.Chi^2:27,071$, $n:20$

Table 11 Intergovernmental relations by state structures

<i>Intergovernmental relations</i>	<i>State structure</i>		
	<i>Unitary</i>	<i>Federal</i>	<i>Total</i>
Weak	0	4	4
Moderate	3	5	8
Strong	7	1	8
Total	10	10	20

$P < 0.05$, Spearsman Correlation: -0.671 , $P.Chi^2:9000$, $n:20$

4.1 Central Local Relations/Intergovernmental Relations

Central and local governments (intergovernmental relations) illustrate some differences among the countries depending on national and political culture. These issues include funding relations, decision-making structures based on the proximity of local organs or lack thereof, are local leaders appointed or elected, autonomy status, centralization or decentralization. Our findings illustrated in Table 11 show that countries that practice unitary system of government have strong intergovernmental relations than those with different forms of decentralized structures such as the federal system.

5 PUBLIC PERSONAL/CIVIL SERVICE SYSTEMS

There are two types of public personnel systems (Kuhlmann & Wollmann, 2014). The first one is open personnel systems, also called “position-based systems.” The second one is closed personnel systems, or “career-based systems.” These systems are usually used together; therefore, it is hard to find countries that use only one of these systems.

Civil services are very prestigious in majority of countries. It seems all countries have career system but practices changed considerably according to the culture of a country in reality (Önder, 2011). Table 12 shows that majority of

Table 12 The impact of politicization of recruitment and promotion on fairness of recruitment and promotion

<i>Fairness of recruitment and promotion</i>	<i>Politicization of recruitment and promotion</i>			
	<i>Low</i>	<i>Moderate</i>	<i>High</i>	<i>Total</i>
Low	0	0	4	4
Moderate	0	4	6	10
High	5	1	0	6
Total	5	5	10	20

$P < 0.01$, Spearsman Correlation: -0.820 , $P.Chi^2:18,933$, $n:20$

Table 13 Nationwide exam to recruit civil servants by politicization of recruitment and promotion

<i>Nationwide exam to recruit civil servants</i>	<i>Politicization of recruitment and promotion</i>			
	<i>Low</i>	<i>Moderate</i>	<i>High</i>	<i>Total</i>
No	4	4	1	9
Yes	1	4	6	11
Total	5	8	7	20

$P < 0.01$, Spearsman Correlation: 0.511 , $P.Chi^2:4318$, $n:20$

the countries have politicization in both recruitment and promotion. There is a very high correlation between politicization of civil service system recruitment/promotion and fairness of civil service system. Developing countries have more politicization and unjust civil service systems than developed counterparts. As Heady mentions, there are differences between developed and developing countries in terms of formalism, which all have almost perfectly defined career system in their civil service.

Because of politicization in recruitment and promotion, public sectors adopt nationwide exam to recruit to reduce favoritism in many countries. There is positive correlation between existence of nationwide exam for recruitment and politicization of recruitment. One expects systems to be more politicized in a system that there is no general entrance exam to public services. As we found in Table 13, countries that use nationwide exams as a tool of recruitment tend to have high probability of politicization thus necessitating the use of nationwide exams. The irony is that one would expect nationwide exams to be a sign of transparency, but it seems to be the fear of politicization that push for national recruitment exams.

Unionization: Research on unionization in public sector show that although unionization has positive impact on compensation, its effects are

Table 14 Unionization of public employee * fairness of recruitment and promotion

<i>Unionization of public employee</i>	<i>Fairness of recruitment and promotion</i>			
	<i>Low</i>	<i>Moderate</i>	<i>High</i>	<i>Total</i>
Weak	0	5	3	8
Moderate	2	3	3	8
Strong	1	3	0	4
Total	3	11	6	20

$P < 0.14$, Spearsman Correlation: -0.335 , $P.Chi^2:5224$, $n:20$

somewhat smaller than the effects in the private sector (Lewin, 1973). In addition to their positive effects on compensation, unions also positively affect employment (Zax, 1985) and other labor rights. Public sector unions have the political power to raise demand for public services and they also possess bargaining power to fight for higher wages Freeman (1984: 52). Bargaining power gives employees strength to ask for higher wages. For example, regulations in labor law in many countries such as Turkey creates strong unionization in the public sector compared to the private sector (Önder & Zengin, 2018).

Our findings illustrated in Table 14 show that there is a correlation between unionization and the perception of fairness of recruitment and promotion of public servants. It means that there is a demand for fair and justice in protecting the interests of public employee.

Supporting earlier findings, we posit that unions are stronger in a place where they are needed. Unions seem to be stronger in developing countries rather than developed ones.

6 CIVIL SOCIETY/NONGOVERNMENTAL ORGANIZATIONS (NGOS)

There is considerable scope for voluntary association in all societies, as groups with common interests prefer to control and independently manage activities that reflect their collective needs. There are many different non-profit services, which increase the opportunity to function as government contractors in a variety of services. NGOs recently provide a huge amount of public services in contract bases (Önder, 2011). The capacity of the non-profit sector informs us about the societal and governmental attitudes of a state. Capacity may be defined, for example, as the number of non-profits per capita, or total non-profit revenue per capita (Önder, 2006: 9). The number of NGOs, number of employees in NGOs (volunteer or fee-earning), voluntary working time per individuals, and an annual support of households (Önder, 2010: 508) are the other parameters measuring the strengths and dimensions of NGOs in a country. Globalization of NGOs and the dominant governance paradigm that

Table 15 Size of civil society, * centralized bureaucracy

<i>Size of civil society</i>	<i>Centralized bureaucracy</i>			
	<i>Weak</i>	<i>Moderate</i>	<i>Strong</i>	<i>Total Total</i>
Weak	0	0	8	8
Moderate	0	6	2	8
Strong	3	1	0	4
Total	3	7	10	20

$P < 0.01$, Spearsman Correlation: -0.876 , $P.Chi^2:25,571$, $n:20$

Table 16 Size of civil society * political culture

<i>Size of civil society</i>	<i>Political culture</i>					<i>Total</i>
	<i>Very conservative</i>	<i>Conservative</i>	<i>Neutral</i>	<i>Liberal</i>	<i>Very liberal</i>	
Weak	5	2	0	1	0	8
Moderate	0	7	1	0	0	8
Strong	0	0	0	0	4	4
Total	5	9	1	1	4	20

$P < 0.01$, Spearsman Correlation: 0.782 , $P.Chi^2:32,222$, $n:20$

heavily promotes the inclusion of NGOs in public service made civil society an important topic in comparative public administration.

The size and institutionalization of NGOs is higher in developed Western countries than developing countries. Similarly supporting culture and prestige of NGOs seem stronger in developed countries. It also shows that countries with colonial history has lower NGO's size and institutionalization. Colonizing countries did not successfully transfer their NGOs culture to other nations. Findings presented in Table 15 show that there is a strong negative relation between high power distance societies and centralized bureaucracies with size and institutionalization of NGOs.

Furthermore, our findings as shown in Table 16 show that NGOs seem to emerge in countries with more liberal political cultures and open societies as we also name them grassroot organizations. Size and institutionalization of civil society in more liberal societies are stronger than conservative societies.

7 RECENT DEVELOPMENTS AFFECTING PUBLIC ADMINISTRATION REFORMS

Public administration has witnessed quite different periods, problems, challenges, and changes. Therefore, we can see broad phase of administrative

reforms' struggles throughout the history. Despite the broad identification of reform phases, the reform initiatives were driven in each country primarily by domestic concerns, tied to specific cultural and historical realities, and reforms contents, success, process, and speed are also unique to each country (Schiavo-Campo & McFerson, 2008: 451). The concerns or topics searched are cheaper, better, efficient, faster, participative, ethical governments. Performance measurements, program evaluations, ethical tensions, low morals, etc., are some of the common issues in reforming public administration. Before the turn of the century, after 1970s, with the impact of many schools and managerialism, we see reinventing government or NPM reform movements (Önder, 2012). However, after 1990s governance reforms were also in the agenda (Marwa et al., 2019).

New Public Management, attempts to reassess existing assumptions and discover and implement best practices (Jreisat, 2011: 21). New public management (NPM) is the paradigm that describes how private sector management techniques, approaches, and theories can be adapted to the public sector. In NPM, the implementation of the following basic methods is especially based on performance evaluation, increasing the importance given to the principles of effectiveness, efficiency, and economy, increasing competition, focusing on output-oriented goals, benefiting from the cost reductions experienced after the developments in information technologies, and the competitive advantages of governance mechanisms (Özer, 2015: 156). However, governance paradigm is rapidly developing based on critique of the NPM paradigm. In addition, governance is seen as an interactive process involving different partnership structures. It brings public administration from management to political science back again by emphasizing citizens rather than customers, participation mechanisms, civil society organizations, transparency, and social accountability (Ayhan & Önder, 2017). The recent reform philosophy view in public administration has been shaped by the emergence of concepts such as NPM and governance.

The comparative analysis of administrative systems and reforms across the world has shown that question of similarities on differences (convergence and divergence) need to be addressed differently according to the theme of reforms such as, decentralization, privatization, performance, participation, transparency, and accountability. New millennia reforms from country cases examples were mostly done with governance philosophies and digital administrations. However, developing countries seem to struggle more with general infrastructure, rule of law, professionalism, and other problems and challenges rather than participation issues. Therefore, we still see general basic restructuring reforms and NPM reforms more than governance reforms.

8 CONCLUSION

The legacy of the colonial period and the military have played the most important role in shaping a country's current administrative system and in the

formation of its political culture. However, this study mainly focused on the administrative system (intergovernmental relations, civil service, civil society, etc.) and recent reforms.

Many countries evolved from an agricultural economy to an industrial one, but at the time civil service was hardly the classical Weberian principle of the bureau-cratic system. Classical bureaucratic models sought to modernize the public administration, based on the Taylorist, Fayolian, and Weberian paradigms. Administrative theories, practices, and policies were mostly imported from developed Western countries. In this context, the bureaucracies were inspired by these paradigms, which constitute principles emphasizing public administration's rationalization in search of efficiency through professionalization, formalism, impersonality, and functional hierarchy.

The multi-faceted reform movements in public administration have an important role in the new millennium. Public administration reforms, led by marketization and privatization reforms after 1980, were supported by digital transformation in the public in the 2000s. However, administrative reforms are often influenced by a country's administrative system and culture.

In social sciences, universal knowledge is usually conceptualized in terms of the extent to which a research finding is generalizable or invariant across different national settings (Cheng, 1994: 163; Przeworski & Teune, 1970). Based on this positivist paradigm of universality of public administration, we cannot explain the public administration systems in developing world that have different contexts (Neuman, 2014; Rutherford et al., 2017). Traditional development administration erroneously assumed that Western techniques and structures were superior to their indigenous counterparts. Therefore, development administration failed due to being unaware of or ignoring the unique cultural and historical factors, because these factors led to the success of Western management techniques (Fredland, 2000; Riggs, 1998), although, even quantitative methodologists were keen to understand contextual variable to search universal knowledge (Cheng, 1994: 164–165). Focusing on only theory building and generalizability of findings unfortunately disregards the unique situations in different settings, because situations and events are not context-free. There are many non-Western countries having social, cultural, and political backgrounds that are different from Western countries. The context or environment, which is difficult to reach an exact decision about it, also contains highly diversified and uncertain situations for different fields. Public administration has its own principles that are embedded in its distinct context, and it is not possible to conduct a CPA research without considering the context. The context is a fundamental source of impact, because it modifies public administration systems due to its distinct social and political principles and values (Jreisat, 2011: 91). There are two types of national contexts that need to be considered by CPA researchers: social context and political context. The former is mostly related with national culture and history, while the latter is related with constitutions and legal systems. Therefore, any comparative analysis should not disregard contextuality.

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Conclusion: Future Prospects of Comparative Public Administration Scholarship

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Chapters 1 to 5 provide a conceptual, theoretical, and methodological framework for cross-national comparison of public administration systems. Chapters 6 to 24 provide a set of country case studies using a wide range of public administrations in different settings across the globe. This concluding chapter reviews the findings and analyses of the country case chapters in light of the overall comparative framework we provided. Moreover, based on previous research and our country cases chapters' analyses, this chapter after briefly assessing historical development, challenges of comparative research generally, and comparative public administration particularly offers to set the agenda for future studies of comparative public administration scholarship.

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Given a large number of country cases from different continents and the even wider range of structures, functions and culture provide a rich repertoire about very similar and very different/unique practices across the world.

I GLOBALISM AND ITS IMPACT ON CPA

The demands of marketization, globalization, democratization, and civil society have dramatically changed the nature of public administration across the globe. The global administrative approaches and practices changed public administrators in various ways, i.e., CEO-like approach in a global village. Technology dominated developments such as communication/internet technologies, social media simplified and transformed the mode of communication among people and governments. Effective communication increased new demands and citizens' oversight, which resulted in better, faster, more efficient public services. Effective communications foster a trustworthy environment between government and citizens.

Recent AI and big data technologies increasingly started to alter economic, political, and military power relations. Additionally, the recent universal administrative system also demands a vast comprehensive bureaucracy that is based on extreme diversity, substantial intricacy, and notable interrelationship (Bapuji & Rao, 2001: 583; Nyadera & Islam, 2020). The emergence of global demands regarding providing public services urges public administration scholars to think globally. Economic, technology, and broad-based global development have interfered with public administration context and most of its premises and tenets require review (Jreisat, 2005: 236). CPA needs to reevaluate current assumptions to unearth and application of suitable practices and principles. And then, the field needs to focus on how appropriate organizational structures can be incorporated into the system and processes within diversified cultural, economic, and political conditions. Thinking globally has its implications and contributions for administrative theory, practice, training, and teaching public administration in future. In the eve of AI, big data and cyber technologies necessarily call for increasing value and the rediscovery of comparative public administration throughout the World.

2 HISTORICAL DEVELOPMENT OF THE FIELD OF PA AND CPA

Public administration as an administrative activity has existed throughout human history. But as an academic field of systematic study, it is attributed to the famous article of Woodrow Wilson's (1887) entitled "The Study of Administration" as a basic principle. Unfortunately, the first image of segregation of public administration from political science continuously affected the public administration identity, which can be seen in politics and administration dichotomy and locus/focus debates in the discipline's development (Nyadera & Islam, 2020). Since then Public administration gained the status

of academic discipline evolved and developed going through the various process. We can find the details about the locus and focus debates of public administration like a pendulum, approaching to management or political science disciplines (Henry, 1995). Despite a century of evolution, there is an insufficient concord regarding public administration scope (Heady, 2001). The institutional setting in which administration exists may be diverse compared to governmental units, a labor union, business firm, church/mosque, educational institution. Public administration is defined as the administration sector established in a political context, which makes it very difficult to separate from political science. This identity crisis also had implications for comparative public administration scholarship.

Public administration after having been separated from political science at the end of the nineteenth century initially came close to the management science/business administration focusing more on technical and principle aspects of administration (Ayhan & Önder, 2017). As a result of early reactions to this dichotomy after WWII, the new public administration movement emerged and outcompete the traditional focus on approaches and principles of administration seeing them as proverbs (Simon, 1946), and emphasized public administrators responsibilities to be based on morals, values, and ethics, and to seek activism strategy in solving society's problems (Denhardt & Catlaw, 2014). We see this movement as a parallel to Marshall Plan and the development aids era increase interest in searching foreign countries' public administration (Heady, 2001).

CPA research is well known for its heydays with Comparative Administration Group (CAG) which received big lump sum support from Ford foundations. There was a declining trend in comparative public administration scholarship after CAG efforts. However, Heady (2001) was very optimistic about the comparative administration's future outcome and envisioned that it will certainly emerge more eminent enhancing public administration through identifications of the area of interest such that comprehension of one's national administration system will be expanded through cross-cultural settings.

After the heavy impact of managerialism, NPM philosophy became dominant throughout the world from the 1970s till the 2000s. Once more PA discipline came closer to business administration (Henry, 1995). Techniques and models developed by the business have been tried to be adopted all over the world, known also as privatization efforts. However, with heavy criticisms of NPM businesslike mentality, public administration discipline and practices came close to political science again and started to emphasized democratic and other values with governance paradigm (Ayhan & Önder, 2017). Public administration is considered the operational aspect of governance that provides the mechanism for effectual policies and decisions implementation (Jreisat, 2012: 3). Lack of instruments to execute policies can make Governance ineffectual as Hared (2018) explained lack of basic government structures is one of the main challenges of governance in Somalia.

UNDP (1997) had the list of “good governance principles” as “participation, consensus orientation, effectiveness and efficiency, strategic vision, responsiveness, accountability, transparency, equity, rule of law, legitimacy, ecological soundness, empowering and enabling, the partnership” (Graham et al., 2003). UNDP, World Bank, and many other national and international organizations have been promoting good governance via various projects. Good governance principles or any other effective and efficient practices and good theories have been adopted/adapted (Pollitt, 2001) and used by many countries in a small global village, which has been increasing the value of comparative method and CPA.

3 CURRENT SITUATION OF CPA

Comparative research has many advantages which will keep and even increase its significance in the development of PA and CPA scholarship in future. We can provide some of them as follows; (a) CPA is a pursuit of patterns and regularities of administrative action and behavior (Jreisat, 2005). (b) Comparative research is significant for administrative theory development and practice (Heady, 2001). (c) The comparative method helps us understanding recent global technological developments and highlights the contextuality of PA and administrative culture (Önder & Nyadera, 2020). (d) CPA emphasizes reforms and developments, efficiency, and performance. (e) Administrative knowledge has been produced by the comparative method, which provides the needs of the practitioner to observe, learn, and improve managerial performance.

Van Wart and Cayer (2006:174) summarized continuing debates in CPA history as; (1) Is comparative and development administration study a “true” field? (2) What is the foremost methodology” to apply? (3) Should CPA be based on theory or practical? (4) And where should the inspiration and concentration be pursued by comparative public and development administration? However, we think these questions partially lost their grounds, since the development administration lost its value considerably. With the rapid globalization, the practices created commonalities rather than organization and administration theories so we followed them. In terms of methodology, all methods and data improved dramatically so we can use any of them depending on our research question and focus.

Over the years, PA scholarship has spread across the world as interest in understanding the administrative systems of other regions gained momentum after world wars. Scholars, particularly from the global south and other developing areas continue to lag in publishing articles in high-impact journals of PA over the last decades. Even with the growing instances of collaboration, still few authors from the Middle East, Asia, Africa, and Latin America published in them (Gulrajani & Moloney, 2012; Önder & Nyadera, 2022). These studies attribute the low number of scholars from developing countries involved in PA research. The globalization of PA scholarship was not reflected since there is a huge discrepancy among different regions.

Administrative experiences of different institutions at cross-national, regional, and local levels hinder the contribution of authors to top journals since evaluations are based upon the judgment of values and cultural bias (Rathod, 2007: 2) of both developed west/north and developing east/south world. In addition, problems of developing countries are at times considered less appealing to the journals' audience or simply lack interest in public administration systems beyond their borders (Gulrajani & Moloney, 2012: 22). There are non-western countries that have been largely ignored by western countries because of ethnocentrism (Heady, 2001) and orientalism (Jreisat, 2012) at worst or Ameri-centrism and Euro-centrism at best (Önder & Nyadera, 2022). Developed north perspectives and issues might be evaluated as a context for the other part of the world.

4 THE CHALLENGES FOR CPA RESEARCH

Comparative research is often blamed with poor accomplishments or failures that might be summarized as (Heady, 2001; Jreisat, 2005: 234); (a) the failure to fulfill the promised benefits due to lack of a "clear identity" as a practice and academic discipline, (b) the efforts to establish prime theories in comparative administration; (c) it is fragmented and lacks synthesis, and (d) methodological challenges.

Problems to make true comparisons have traveling and language problems, transferring concepts and terms between different linguistic and cultural contexts (Kuhlmann & Wollmann, 2014: 282). The need for abstractions to generalize practices or findings necessarily requires leaving or ignoring some details, but how we know which one to out seems to be a little bit sensitive and value-based. Many of the limitations of our understanding of the issues surrounding CPA research are the result of data limitations on the availability and quality of the data to study public administration across the nations.

Riggs (1991) argued that scholars cannot solely characterize theories on actual unique American experiences due to the processes of producing well-grounded knowledge and principle of public administration are essentially relative. US foreign policy practices (Kupchan, 2007) and public administration scholarship in recent years are full of narrow-mindedness practices, ethnocentrism (Heady, 2001), or ignorance of the other world's problems (Önder & Nyadera, 2022). US PA scholarship and practices need to be aware of global demands and developments if they want to keep their global leadership which requires global understanding. Subramaniam (2000) accused the American perspective on comparative researchers in terms of a methodology, as surface researchers with few quantitative models rather than an in-depth understanding of the developing world as the main reason for CPA failures. He suggests inductive methods and a more comprehensive understanding of comparative research and theory. Research on PA scholarship in the most famous PA journals (Önder & Nyadere, 2022) also similarly found

that western scholars of PA are not interested in problems of developing worlds.

The global factor is accordant with the primary goal and establishment of a cross-cultural comparative perspective for better public administration training and exercising since globalization heightened interconnections between countries. Increased globalization led to the need of learning more about how public organizations and institutions work effectively and efficiently in various cultural settings; public administration research requires employing comparative perspectives (Fitzpatrick et al., 2011). A global public administration perspective provides more opportunities and clearer understandings of the strengths and weaknesses of the public administration process, functions, and global problems. Top PA journals western world should be aware that they are not explaining and reflecting the realities of North America and Europe only but also carrying out their duties for the sake of science and PA academic field of the entire world. With more inclusive PA scholarship, they can encourage better solutions for PA problems and their solutions in future. PA scholars ought to realize the huge impact of globalism that has evolved. Global public administration pave way for productive adaptation and transformation from a traditional, ethnocentric outlook to an extensive range that consolidates knowledge from different regions and cultures (Islam, Bingöl et al., 2020; Islam et al., 2021; Islam & Hossain, 2020; Islam, Önder et al., 2020). However, the future comparative analysis has to be unlocked for the inclusion of both indigenous models and native patterns of learning and requisitioning together with Western theories, models, and practices (Jreisat, 2012: 27).

5 DIRECTIONS FOR FUTURE CPA RESEARCH

Comparative public administration has come a long way. The field has revived significantly in the past 30 years together with the new millennium with a global force for change. The establishment of CPA enhanced theory, ameliorate the general interpretation of the obligations of administration, and the administrative research horizon was expanded to integrate many developing countries that were previously left out (Jreisat, 2011: 54). Currently, in the new millennium, some more books and journals often comprise comparative materials, methods, and different theoretical approaches. Global databases, despite having defects, are a lot better than before. Travels are easier because of general improvement all over and communications thanks to the social media and internet technologies have been eased, hence the international research teams' establishment is also made easier and effective. There has been an increasing source of international research funding opportunities which include PA in their programs. A productive and hasty growing ground for academic activity is produced as a result of numerous intersections between national governments and international organizations (Pollitt, 2011: 124).

PA in general CPAs in particular needs to pay attention and reply to new demands, threats, opportunities, and trends in the millennium. Some of them

are (Ayhan & Önder, 2016; Batalli, 2016; Farazmand, 1996, 2001; Köylü & Önder, 2017; Önder & Saygili, 2018); new world order after the cold war era, democratization demands, internet, and social media, marketization, women labor, professionalization of bureaucracies, westernization/Americanization, development of civil society, artificial intelligence, big data, Islamophobia and ethnocentrism, genuine values, interdependencies (Walia et al., 2019).

The current public administration operates in a different time and encounters various challenges, that needs up-to-date approach and methods that would include the global world. Therefore, upgraded prospects and recent empirical information are needed by the CPA to ease the actualization of the twenty-first century. A more comprehensive scope of public administration will promote CPA research more since it will cover not only structures but also functions by considering different contexts.

Jreisat (2005: 231) emphasizes four dimensions in future comparative research cross-cultural studies to be feasible, integrative, and applicable; (a) the application of researchers' cooperative group rather than individual endeavors; (b) the multi-case analysis utilization rather than the traditional single case studies; (c) benefiting comprehensive understanding of cultural impacts on administration; and (d) development of middle-range analysis for examination of specific administrative operation that covers national boundaries. An adaptive framework is necessary for future comparative research for a systematic comparison reconciliation of various administrative systems. These attributes are (Jreisat, 2005: 237); (a) Extensive with the ability to balance incongruous that exists in research findings of past comparative studies, (b) Pliability to rationalize both conceptual and practical field concerns, (c) Adaptableness in the countenance of the basis contextual variations, (d) Accommodative to include both indigenous models and native patterns of study and utilization, together with concepts and models of Western.

Rutherford et al. (2017: 208–209) suggest these orientations in advancing CPA scholarship; (1) contextual and systematic cross-national comparative research on public administration is essential, (2) it may be particularly useful to coordinate comparative research involving indigenous scholars from targeted national settings, (3) Bigger and better data sets are necessary for a comprehensive comparison. Pollitt (2011: 124) was also trying to highlight how difficult was to do comparative research “good comparative analysis is, therefore, anything but bean-counting.” Sigelman (2006: 12) after analyzing the heyday of CPA journal articles, similarly concluded that a more productive line of attack would take in the introduction of recent strategies of data management because the testing of previous assumptions and the building of theory would be eased by the availability of data series. It is interesting to note that with current technologies, we even can count the beans. Current big data and artificial intelligence algorithms challenged the idea about the lack of good data and made it possible to do comprehensive content analysis. The developments of data accessibility from a variety of resources and alternative ways of using data increased because of big data and new AI algorithms.

With regards to content, geographical coverage, and method, CPA research fragmented. The further conceptual and theoretical development in CPA, a stronger interdisciplinary exchange of research and researchers is needed. The conceptual formation and empirical validation of indicators, the collection of empirical data, and set up of databases, reliable, cross-nationally comparable, and accessible need to become a stronger focus of CPA (Kuhlmann & Wollmann, 2014: 283). Rather than one type of method, quantitative, qualitative, hybrids, or multi-methods should be utilized based on the research question. Good CPA research consists of diverse studies. Effective theory manual for practitioners originates from different types of research which include reasonable, descriptive, and exploratory, essays and research, studies with different sample sizes, complex multivariate statistics research, and research using qualitative designs (Brower et al., 2000). However, across all considered cultures the concept must be distinct and equivalence; there must be a description of methods; and various methods, applicable to the subject of study and the size of the sample, should be utilized to reach the valid, serviceable outcome for practitioners and researchers (Fitzpatrick et al., 2011: 827).

It seems that practically developing global public administration accelerated comparative research more than a scholar who has been trying to improve CPA scholarship. New opportunities are granted by a global public administration for a more comprehensiveness of the merits and demerits of administrative systems, operations, and instruments worldwide (Gulrajani & Moloney, 2012: 84). Comparative research should not restrict themselves to only developed countries. They should consider society's culture and the context they are studying.

This book intends to promote a comparative understanding of different nation's public administrations. Hence, as Rutherford et al. (2017: 210) suggest for comparative research, similar or better research can initiate an innovative line of scholarship in which we compare and contrast data across public services, across subnational jurisdictions, and across developed and undeveloped countries.

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