Chapter VI

Comparison

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Principles of Comparison

The need of studying comparative governments has always been universally recognized. The question to consider in any exercise of comparison is how far the conclusions drawn from the experience one country can validly be applied to the political system of another country. Can the data of government and politics of countries be regarded as strictly comparable in any sense, or is it unique to the particular countries from which it is drawn.

The main reason for the comparison is that while one may consciously study one’s own country entirely without comparison, it is practically impossible to study a foreign country without continually comparing it at least with one’s own.\(^1\) A minimum requirement of comparison is that it should be based at least on a conceptual framework, that is, a number of consciously interrelated concepts, which are brought into comparison. Therefore, comparison is not always between different countries; one can compare different institutions of a similar type within the same country or across the countries; in this case, the Committee systems in the Parliaments of India and Britain. Another principle of comparison is the similarity of contexts, whether it is society, history or culture, which makes it easy for selecting variables in comparison.

From the above, it becomes clear that two elements are essential to comparison. One, a fundamental similarity between two objects to be

compared; two a description of resemblances and differences between the similar elements and objects which are compared. Comparison mainly deals with two things, namely, with institutions, and with their functions. In the words of Edward Freeman: “By comparative politics I mean the comparative study of political institutions, of forms of governments, and under the name of comparison I wish to point out and bring together analogies which are to be seen between the political institutions of times and countries most remoter from one another”.

We have used the institutional approach in the thesis dealing with the phenomenon of Parliaments. Comparison in this case involves, first, relatively detailed description of institutions in question, and, second, an attempt to make clear if details are similar or dissimilar. To illustrate, the Parliament in each of the two countries has similar historical traditions, identical or similar procedures, and similar constitutional powers. But in one of the two Parliaments, constitutional powers are more fully used than the other.

In the above approach, however, there are two difficulties: first, superficial details are over emphasized in comparison. For instance, one may spend much time in discussion of the niceties of procedures; composition of a particular Committee and one may draw conclusions from the similarities without sufficient analysis of their real importance and the context. It has been taken note of in the thesis. Second, is it fair to deal with the same

\[2\text{ Ibid., p.72.}\]
institutions simply because the name remains the same. For instance, is monarchy in Saudi Arabia comparable with monarchy in Denmark? Is an election same thing in India as in the United States? But the Parliamentary Committees in UK and India are similar because of a common evolution and similar political contexts. Therefore, in making comparisons at the institutional level we have to take various characteristics into account; the genesis of the institutions as well as their various characteristics; their common background; the purpose in their creation; and, finally, the importance of the institution in the governance of the country. So it is important to keep the context in mind.

**Need for Comparison**

What do we hope to attain by comparing? Several benefits can accrue from an exercise in comparative study; evolving a theoretical framework on the subject creating knowledge and enhancing one’s understanding of the subject, finding out critical gaps, in politics and structure and exploring if the gaps can be filled by learnings from each other; and finally assessing relative strength and weakness? Is building a theory is the purpose of the comparison? It may not be logical to expect to have a theory out of this comparison. What one can reasonably expect is to build parts of that theory, which is, accountability and transparency lead to good governance. Second, does it help us to understand Indian Parliament better? It will help us refine our understanding of the institutions, their functions and processes in each country. Third, do we recognize the gaps in the functioning of the Indian
Parliament to the best of its potential, and the British Parliament may have stopped innovating, in the present context of European Parliament gaining more powers cutting into those national Parliaments. Fourth, how does the comparative study help us identify strengths and weakness, comparing and identifying fluctuations in the effective scrutiny of the executing and follow-ups?

Comparing the Parliamentary Committees

Parliamentary procedure is one of the traditional objects of the study of political science, perhaps, naturally, since it has been of basic importance in the development of democracies. The procedure of any Parliament depends upon its general structure, its constitutional position and its functions. In the thesis, the role of Committees in defining and maintaining the relationship between the Parliament and the executive has been the central focus of the Committees. Although, traditionally, the basic function of a legislature is to legislate, this may not necessarily be the most important function today. It is not only the constitutional structure, but also the needs of the society, which define the functions of the institution. The question of control over the executive, especially in countries with Parliamentary form of governments, seems in many respects, to be the most important function of Parliament. This also necessitates particular devices such as questions and creation of Committees. The Committees have become an important factor in the relationship between the Parliament and the executive, and by extension, in promoting good governance.
Comparison can cover the structure, functions and impact of the Committees. To what extent, does the majority maintain effective control over the decision and procedure of the Committees? Who sits on these Committees? Do the members of the governments sit in the Committees? If so, do they appear as leaders or as witnesses? Does the government take the advice of the Committees? Is much policy or technical support provided by the Committees?

The working procedure is quite important. For instance, do the Committees hold open or closed meetings? It is a normal practice in Britain to open the Committee meetings to the public, where as, in many other countries, including India, they are not; although there may be an advantage in this as it provides opportunities for political discussion undisturbed by the media, and for coming up with consensus position irrespective of their party affiliation. The other area is the question of relationship between the government and the Committees. In some cases, Committees exercise great control over the governments, in some other, it may be other way round. All these questions provide a good scope or comparison.

In Clause 3 of Article 105 and Article 194 of the Constitution of India, the power, privileges and immunities of the Committees of the Houses of Parliament and State Legislatures have been equated with those of the British House of Commons. Parliamentary procedure in India is not merely a

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3 Yogendra Narain, Secretary General, Rajya Sabha, made this point in Lucknow Club Lucknow, 30 August 2003, in answer to a question put to him by the author.
replica of the procedure obtaining in the British House of Commons. The fact is that although in matters of broad principles there is similarity between the two systems, there are considerable differences in detail and actual practice. Even in respect of Committees, the Indian Parliamentary procedure contains some new concepts, which are not found in Britain; the Committee on government assurances in Lok Sabha is an innovation of the Indian procedure.

In Britain, they had at times reorganized and reformed in order to examine the Parliamentary procedure and functioning of the Committees. India largely copied the system in 1948 from House of Commons and did not have any objective analysis and scrutiny of either Parliamentary procedure or those of the Committees. As in the House of Commons, Committees in Indian Parliament are not of overshadowing importance, they are only auxiliaries of the legislature. Their scope of operation is much less than their counterparts in Britain. The Committees in Britain help formulate policies and intervene in the actions of the government. The functions of the Committees include consideration of amendment of bills, inquiring into matters in control of public accounts, besides scrutiny of governmental functioning. Let us look at some specific issues of the Committee system - experts and staff, attitude of members, powers and functions, procedures,

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5 R.R.Morarka, ibid., pp.61-62.
budgets, follow-ups and impact, and the future of the Committee system on respective Committees. It will also look in comparison at three specific and important Committees - Public Account Committee, the Estimates Committee and Committee on Privileges.

Experts and Staff

Expert assistance is not available in the Indian Committee system. Professional secretariat or professional consultancy is almost unknown to Indian Parliamentary Committees. The Committees scrutinize highly sophisticated, trained and resourceful bureaucracies. To do so, Committees require professional assistance. Theoretically, the Secretary of Lok Sabha is the Secretary of the Committees of the House. But, in reality, except for some administrative work, the Secretary never comes to the meetings of the Committees. The Joint Secretary who is in charge of these Committees rarely comes to the meetings of the Committees. So they are not in a position to make any contribution or give any suggestion to the Committees.

1. In Britain, the Committee Chairmen are allowed to appoint outside experts for the purpose of Committee work, even on a temporary basis.

2. They are also provided with research assistance, at least in collection of data, etc., although inadequately, which is of a continuing concern. In Britain the system is made open to use experts and take consultancy services, because the Committee members in Britain do
their homework, study the issues thoroughly and make informed participation in the proceeding and make substantial contribution to the issues discussed there. The consequence is that the bureaucracy behind the political executive dominates the legislature. The only way to reduce the dominance of bureaucracy over the legislature, and to make them cooperate with, and develop respect for the legislature and its Committees, is to develop expertise within the Committees themselves which is possible with the assistance of experts.

Attitudes of Members

In addition to expert help, the usefulness of the Committees depends upon the interest of the members and the attitude of the government. The work of the Committee can come to naught if the government itself is indifferent to Committee Reports or is influenced by the Party lines. Likewise, if the members are not interested in their work they will not be effective. Opinions of the Committees of the House of Commons carry much greater weight than the opinions of the Committees in the Lok Sabha in the Indian Parliament. For instances, in Britain, a member in charge of a Committee on Expenditure becomes, in time, an expert on that subject, but in India a member belonging to more than one Committee hardly does his home work or takes much interest.
Powers and Functions

In Britain, Committees are an integral part of the House of Commons, while the federal system in India means that there is somewhat less pressure on Indian MPs to "perform" the welfare officer's role than at Westminster. The governments are in the business to govern and to implement policies, and if the Committees lessen that role, it may not be looked upon with favour. However, electoral reforms might alter the existing situation in either country; for instance, moving them from single party majority to multi-party government. This change should necessitate give and take between the parties forming the government. At the same time, it would alter the relations between the executive and the legislature, including its Committees. In fact, in India, it has already moved in that direction. Since last decade there has been a trend of multi-party coalition government; the present government (1998-2003) consists of a many as 23 political parties.

Procedures

The difference between the British House of Commons and the legislatures in India on matters of procedure is that, in India, the motion for consideration is accepted without refereeing a bill to a Committee. Also, on a report from a Committee the House considers a Bill clause by clause and any member can propose amendments to the clause of the Bill, where as, in the British system, Bills are always put to the Committees - Standing Committees or the Committee of the Whole House. The Committees then
consider the Bill clause by clause and then considers it as a whole. As a result, there are certain restrictions as well as freedoms in proposing amendments to the Bill under consideration by the House.

On the life and durability of the Committee, Britain's new Select Committees are established for the duration of the whole Parliament, encouraging continuity and coherence in their work. On the other hand, the Indian Departmental Standing Committees exist for one-year duration only.

Select Committees and the Presentation of a Bill

The composition and function of a Select Committee, both in the UK and India, also brings out the difference, in degree, of their performance. In the Indian Parliament, conventionally, all political parties should be represented in Select Committees. This is aimed at giving fair representation to all shades of political opinion. But, in the British House of Commons, members of the Standing Committees are so chosen as to reflect the composition of the House, but no such procedure is followed for the Select Committees. The merit of the members counts more than their party affiliation.

The sittings of the Select Committee are also different. In the UK, the Select Committee sits when the House is not in session and it cannot sit during the

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8 India, Lok Sabha, Rules of Procedure and Conduct of Business in Lok Sabha (New Delhi: Lok Sabha Secretariat, 1998), Rule 331D (4).
question hour. But in India the Select Committee can sit when the House is sitting; also, there are rules which require that a Select Committee should suspend or adjourn if a division is called in the House. With regard to the venue, a Select Committee in UK cannot, without the leave of the House, sit in any place beyond the precincts of the House.¹⁰ In India also the procedure is followed, except that a meeting can be held elsewhere with the permission of the Speaker.¹¹

The presentation of the Bill to the House is also procedurally different. In India the Bill goes through (i) introduction, (ii) consideration, (iii) passing, corresponding to first, second and third reading. In the British House of Commons at the second stage, that is the consideration stage, a motion that a particular Bill may be referred to a Select Committee would be adopted. The referral to the Select Committee in Britain can be made either in the alternative or as an amendment, and the Bill is then passed. So, at this stage, there is a difference between the procedures obtaining in the Indian Parliament legislature and in the House of Commons.¹²

As soon as a motion is adopted in the House of Commons to the effect that a Bill be read second time, the Bill is automatically referred to a Standing Committee or a Select Committee or a Committee of the Whole House. Furthermore, a motion for recommittal may be made either at the beginning

¹⁰ David Lidderdale KCB., ed., Erskine May's Treatise on, n.6, p.642.
¹¹ India, Lok Sabha, Rules of Procedure and Conduct of Business in Lok Sabha, n.8, Rule 267.
¹² A.R. Mukharjea, n.9, p.228.
or at the end of the consideration stage, and not during the proceedings of
the consideration stage. In both the countries the Bill may be referred to a
Joint Select Committee of the two Houses. But such Committee can only be
appointed in Indian Parliament with the concurrences of the two Houses. But
in Britain a Joint Committee composed of equal number of members of each
House is appointed at the instance of either of the House.¹³

The powers of the Select Committee with regard to recommending the
dropping of a Bill significantly vary. Usually, a Select Committee, to which
a Bill has been referred, has no power to put an end to the Bill itself. But
there have been instances in the past, in the British House of Commons, that
Select Committees have negatived all the clauses and even the numbers of
the Bills, and have made a special report to that effect to the House. If a
Select Committee wishes to recommend that a particular Bill should be
dropped, it ought to make a special report that the Bill should not be
proceeded with.¹⁴

In both Parliaments in UK and India, the Select Committees are authorised
to summon expert evidence and hear representatives of special interests
affected by the Bill. Finally, the reports of the Select Committee are based
on majority decision. In India, however, a member disagreeing with the
report can submit a note of dissent, where as in Britain no such dissent is
allowed, not a separate report. The proceedings of a Select Committee are

¹³ Ibid., p.225.
¹⁴ Ibid., pp.226-227.
treated confidentially. In the British Parliament, normally no objection is made to the publication of evidence of witnesses examined in public by the Committee, provided the report is fair and accurate. It was not so in the Indian Parliament, but now it is changing for the sake of openness and transparency.\textsuperscript{15}

Talking of similarities, a Former Secretary General of the Lok Sabha, R.C. Bhardwaj, said: "The composition of Committees is similar in both the countries. Most Committees consist of members from all political parties in proportion to their strength in the House". He added that the Financial Committees in both countries are very similar, although the nomenclature may be different.\textsuperscript{16}

Public Accounts Committee

Comparing one of the important Committees both in Britain and India, the Public Accounts Committee (PAC), the main figure behind the work of the PAC is the CAG with the distinction that, in the UK, he gives the Committee the report of his own opinions and recommendations, and he is an officer of the Parliament. In both the countries, the PAC functions on non-party lines and, therefore, enjoys considerable prestige and authority. There is considerable similarity of procedure and practice obtaining in UK and India. On matters of details, however, there are some differences: the number of witnesses appearing in Britain is comparatively small, the representative of

\textsuperscript{15} Ibid., p.232.
\textsuperscript{16} R.C.Bhardwaj in an interview with the author on 30.01.1996, in Delhi.
the treasury and that of the Ministry under examination are permanent witnesses in the Committee.\textsuperscript{17}

In matters of financial administration, there is a difference in procedure between the Committees in Britain and their counterparts in India. There is a tendency, in India, on the part of the Secretaries to get involved in the detailed execution of the policy decisions of the government. A case in point is the loss of revenue from a lease of forest areas commented upon in paras 6.51 to 6.69 of the 47\textsuperscript{th} Report of the Public Accounts Committee.\textsuperscript{18} It was related to the appropriation accounts, 1962-63 and 1963-64, of the Government of Kerala. The \textit{seigniorage} rates for the bamboo were reduced from Rs.5 per hundred, that is Rs. 2.80 per ton, to Re.1 per ton. This was done at a meeting between the Chief Minister and the Industries Minister and the Company. Since no minutes of the meeting were kept, the deal was far from being transparent.\textsuperscript{19}

In Britain, the Public Accounts Committee was established by Gladstone in pursuance of the recommendations of the Select Committee on Public Moneys. In India, PACs were created, both at the Centre and the States, after the Reforms of 1919. After independence, the Parliament derived its powers to set up such a Committee from Article 118 (1) of the Constitution.

\textsuperscript{17} A.R.Mukherjea, n.9, pp.314-315.
\textsuperscript{18} India, Lok Sabha, Public Accounts Committee, 47\textsuperscript{th} Report, Third Lok Sabha 1962-67 (New Delhi: Lok Sabha Secretariat).
\textsuperscript{19} Ibid.
Estimates Committee

The idea behind setting up Estimates Committees in UK and India is the same; that a Committee of Parliament should examine the details of estimates of expenditure of the Government every year. Thus, the Estimates Committee in the Indian Parliament has been constituted on the pattern of Estimates Committee of the House of Commons, in UK, where such a Committee was created in 1912.20 However, the scope of work and their methodologies differ. The nature of the Committees is also different from each other. In the UK, the Estimates Committee is a Sessional Committee, appointed on Government motion for session to session.21 The motion contains the Terms of Reference of the Committee and the names of the members to be included in the Committee. In India, the Estimates Committee is a Standing Committee whose scope of functions, method of appointment and other related matters are provided in the Rules of Procedure and Conduct of Business in Lok Sabha.22

The Estimates Committee has its chair always from the ruling party. Both in India and UK, this is the procedure. But in UK, the Chairman is elected by the members of the Committee after it has been constituted. In India, the Chairman is nominated by the Speaker. But, if the Deputy Speaker is a member of the Committee, he automatically becomes the Chairman. The

22 India, Lok Sabha, Rules of Procedure and Conduct of Business in Lok Sabha n. 8, Rules 310-312.
Estimates Committee appoints a number of Sub-Committees, which enable them to handle larger amount of work.\textsuperscript{23}

In an important area of functions, the Indian Estimates Committee has greater domain than its British counterpart in respect of dealing with policies. It may be in order, for the sake of comparison, to look at it in some detail. The functions of the Indian Committee as laid down in the Rules\textsuperscript{24} are given below:

(a) To report what economies, improvements in organization, efficiency or administrative reform, consistent with the policy underlying the estimates may be effected;

(b) To suggest alternative policies in order to bring about efficiency and economy in administration;

(c) To examine whether the money is well laid out within the limits of the policy implied in the estimates.

(d) To suggest the form in which the estimates shall be presented to Parliament.

The Speaker, by a Direction, has defined the contours of the term ‘policy’ mentioned in Clause (a) above. The direction states that “the term ‘policy’ refers only to policies laid down by the Parliament.”\textsuperscript{25} Either by means of

\textsuperscript{23} India, Lok Sabha, \textit{Estimates Committees} (New Delhi: Lok Sabha Secretariat, March 1998) (pamphlet).

\textsuperscript{24} India, Lok Sabha, \textit{Rules of Procedure and Conduct of Business in Lok Sabha} n. 8, Rules 310-312.

\textsuperscript{25} C.D. Deshmukh, then Finance Minister, in a speech in Lok Sabha on 23 May 1952 said: “I look forward to continuing assistance from labours of the Estimates Committee in securing that, within four corners of the policy laid down by parliament the money authorized to be spent by it are utilized to the best possible advantage without avoidable waste.” See S.L. Shakhder, “Two Estimates Committees”, n.20, p.391.
Statutes or by specific Resolution passed by it from time to time, the Direction further provides that "it shall be open to the Committee to examine any matter which may have been settled as a matter of policy by the government in discharge of its executive functions." 26

With regard to Clause (b): "The Committee shall not go against the policy approved by Parliament; but where it is established on evidence that a particular policy is not leading to the expected/desired results or leading to waste, it is the duty of the Committee to bring to the notice of the House that a change in policy is called for." 27 Pertinently it may be recalled that, "the fundamental objectives of the Committee are economy, efficiency in administration and ensuring the money is laid out; but if on close examination it is revealed that large sums are going to waste because a certain policy is followed, the Committee may point out the defects and give reasons for the change in the policy for the consideration of the House." 28

In UK, the functions are defined in the motion29 that is brought before the House every Session for setting up the Estimates Committee. The motion

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26 Ibid.
27 India, Lok Sabha, Direction no.98 (3), issued by the Speaker of Lok Sabha (New Delhi: Lok Sabha Secretariat).
28 The Speaker M.A.Ayyangar, while inaugurating the Estimates Committee in May 1959 said: "Your function is not to lay down any policy. Whatever policy laid down by Parliament, your business is to see that policy is carried out - not independently or divorced from its financial implications. You must bear in mind constantly that you are a Financial Committee and you are concerned with all matters in which finances are involved. It is only where policy involves expenditure, and while going into the expenditure you find that the policy has not worked properly, you are entitled and competent to go into it. Where the policy is leading to waste, you are entitled to comment on it in a suitable way." See, S.L.Shakdher, "Two Estimates Committees", n.20, p.392.
states: “That a Select Committee be appointed to examine such of the estimates presented to this House as may seem fit to the Committee and to report, what, if any, economies consistent with the policy implied in those estimates may be effected therein, and to suggest the form in which the estimates shall be presented for examination."

The commentators of the British constitutional system argue that, broadly, the Committee avoids all questions of policy. But it is not clear in any such writing or comments what exactly is meant by policy in this case. Clearly, a Committee of Parliament is bound by the policy laid down by it. But it cannot be limited in its work by any policy laid down by the Government in discharge of its executive functions; any such policy has to be subordinate, in any case, to those of the Parliament.

In UK, the Estimates Committee works through Sub-Committees, which considers the procedural and other matters relating to the working of the Committee. The Sub-Committees also take evidence and formulate their reports which are then considered by the whole Committee. In India, so far, the Sub-Committee system is not in practice, except in the case of the Ministry of Defence.

Under the British system, the Ministers are concerned with policy matters; the Secretaries keep out of the executive matters, letting the departmental heads to handle them. Both the Secretaries and the Ministers depend upon

30 Ibid.
the Audit to bring out any financial irregularities or financial failures on the part of heads of the departments. Thus they encourage audit, without which, it is normally quite difficult to be certain of whatever is happening in their departments. ³²

Committee on Privileges

In India, there is Committee on Privileges on the pattern of the Committee in UK. The rules are not codified, except by mentioning that the members will have the same privileges as those enjoyed by the Members of House of commons in UK. They have not been revised in UK for quite some time. For instance, in UK, the practice is that a member of Parliament cannot be arrested before 40 days of the sitting of the House and until after 40 days of the adjournment of the House. This is a very old rule, when a member had to come on horseback from afar to attend the Parliament and he needed another 40 days to trek back to his constituency and settle down. ³³

Innovation in the Committee System

The Tenth Indian Lok Sabha introduced two innovative instruments in order to involve Members of Parliament (MPs) in the planning process as well as to facilitate their greater participation. The first was to expand the Committee system by establishing 17 Departmental Standing Committees. This has provided members with an opportunity to make constructive suggestions to the ministers in each Department for better performance. The

³² Ibid.
³³ Narrated by Dr. Y. Naraian, Secretary General, Rajya Sabha, n.3.
second was the initiation of MP Local Area Development (MPLAD) Scheme, which entitled the MPs to recommend works, worth two crores in a year, in their constituencies and help them to close the gaps created through the centralised planning.  

It is another matter that the MPLAD Scheme did not have a desired level of success, and the large amount of unspent money brought bad image to the MPs. It was unclear as to how the MPs should utilize the money as it was to be routed through the local bureaucracy in the constituency of matters. Moreover, there was inadequate support and scrutiny for this fund. The Speaker then suggested, in 1989, that the Committees should be created to scrutinize the expenses under the scheme. The Committee on Government Assurance is an innovation in the Indian Parliament, which does not exist in the United Kingdom. This Committee records and discusses the assurances made by the Ministers in the House. Subsequently these assurances are laid on the table of the House. Similarly, when the refugee problem became acute, in 1947, immediately after partition the Minister for Rehabilitation became sentimental about it and promised that the government will not rest until each refugee was settled. This assurance continued for at least two decades as the problem had not been solved. This is an unique feature that the Parliamentary Committee pursues that whatever is promised in the

35 Ibid.
36 R.C.Bhardwaj, n.16.
House must take place.\(^{37}\) Another feature, according to R.C. Bhardwaj, is that the Committee makes its report to the Government and then consider the response of the ministers to each observation and recommendation made by the Committee.\(^{38}\) There is no similar Committee like the Committee on Government Assurances, in UK. Philip Norton, when asked about it, confirmed that it is an interesting idea which could be tried in UK. This let to innovation in functions for the Committee.\(^{39}\)

**Attitude and Behaviour of Members**

There is qualitative difference between the members in British Parliament and their counterparts in India. But, as Philip Norton, the noted constitutional expert in Britain, observed, in the relationship between various parties and MPs in recent Parliaments, “there has been greater willingness to deviate from the party line.”\(^{40}\)

**The Budget and the Committees**

In the United Kingdom, the estimates for the financial year are presented by the end of February to the Committee of Supply. Usually, in April, the Chancellor of Exchequer presents the budget to the Committee of Ways and Means. After the statement by the Chancellor, the members of the Committee pass resolutions, to give effect to the budget. It is customary for

\(^{37}\) Ibid.

\(^{38}\) Ibid.

\(^{39}\) The author’s interview with Philip Norton on 24.10.2002 in London.

\(^{40}\) Ibid.
the Committee to pass all resolutions except any on the budget day. Thus the Finance Bill is based on the resolutions made by the Committee.

In India, there is no committee of Supply nor the Committee of Ways and Means, which are also known in UK as the Committees of the Whole House. The budget is a statement of estimated receipts and expenditure of the Government. Furthermore, in the Indian system, there is no provision for setting up of these Committees. The Budget is presented to, considered and passed by the House as a whole, and the usual rules of debate apply.

Conclusions

From the above facts, it is clear that, despite common background, the Committee systems in Britain and India differ substantially. For instance, in matters of investigation, a British Committee can summon the Prime Minister for questioning but that is not the case in India. The witnesses, including ministers, are asked difficult questions on the basis of information the Committees possess. Secondly, on the question of openness, the Committee system is quite transparent in the Westminster as the business is conducted in the open. That is the strength of the system in UK, which is in contrast with the system in India. Third, the Committees in both countries go beyond the normal investigative briefs to the questioning of policies. But, in India, the Committee members, particularly from the Opposition, take the

41 Lord Bhiku Parekh confirmed this in an interview with the author on 9.10.2002 in London.
42 Mr. Piare Khabra, a Member of Select Committee for International Development, House of Commons, in an interview with the author on 24.09.2002, in London.
issues to the people during elections. They embarrass the government by sharing that they had recommended certain important measures but the government did not respond. Therefore, the current practice in India is that the ministers discuss their policies with the Standing Committees. This gives them two advantages; the ministers can say that, they have taken the policies up with the Committees; and they also get the feedbacks from the Committee members.

Fourth, the structures of the Committees differ as India is a federal set up and the UK has a unitary system. In order to make up for this, in UK there are Regional Committees. Their counter parts in India are the Committees of State Legislatures. In addition, there are Ad-hoc Committees, created from time to time to discuss regional issues. The Ad-hoc Committee ceases to exist the moment it finished the work.

Finally, the most striking contrasting feature is the attitude of members and the influence of party affiliation. In fact, this goes into the very root of the Committees. The Committees were set up to discuss matters objectively in a non-partisan way, which was not possible in the House. In India the party influence seems to be comparatively stronger in the deliberation of Committees than what is seen in UK. But that situation seems to be changing. According to observers, the Members of the ruling party are now

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43 Dr.R.C.Bhardwaj, n.16.
44 Ibid.
45 Ibid.
seen to be criticizing their own government. It is also encouraging that the
government also sees it as an input in toning up the government function.\textsuperscript{46}

In India, a Committee like Procedure Committee should be constituted. Such
a Committee exists in Britain. Perhaps, this would reinforce the working of
the Committee structure, particularly those of Financial Committees. Also it
would meet the needs of the welfare state committed to equity, social justice
and fairness. An Indian commentator on the Constitution has suggested that
Lok Sabha should also adopt the system of the Committee of the Whole
House so that knotty issues can be thrashed out informally and backbenchers
will have better chance to get off their chest what ever they wanted to say.\textsuperscript{47}

\textsuperscript{46} Ibid.
\textsuperscript{47} T.M.Rao, “Executive’s Role: Strengthening Parliamentary Checks”, \textit{The Statesman}
(New Delhi), 14 November 1981.