

## **How are prime ministers held to account? Exploring procedures and practices in 31 parliamentary democracies**

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The relationship between governments and legislatures is founded upon a confidence agreement, whereby the executive derives its authority from, and is accountable to, the legislature. As heads of government, prime ministers are crucial political actors in parliamentary systems, yet there is little understanding of how they are held accountable by legislatures. What are the mechanisms through which parliamentarians may question them? How do such mechanisms vary, and how do procedural rules affect questioning and accountability? This paper builds on theoretical foundations from comparative legislative studies and presents the first survey of mechanisms through which parliamentarians may question prime ministers in 31 parliamentary democracies. It draws on research on parliamentary rules of procedure, followed by a consultation with practitioners on matters of convention and practice. It presents novel classifications and typologies of parliamentary questioning mechanisms that include prime ministers along six key dimensions, thus filling a crucial gap in executive-legislative studies.

**Key words:** Legislative studies; executive-legislative relations; accountability; prime ministers; parliamentary questions

## **Introduction**

The relationship between prime ministers and legislatures is undoubtedly a crucial component of the politics of parliamentary democracies, where the executive derives its authority from, and is accountable to, the legislature, and prime ministers occupy a central role in the executive (Lijphart 1999; Bergman et al. 2003). Yet important questions about this relationship remain unanswered. Accountability, as a key component of democratic politics and a central function of legislatures, is usually seen through its defining moments: the investiture and the withdrawal of confidence. The most central aspect of the interaction between prime ministers and legislatures is hence whether they manage to form a cabinet and command the confidence of parliament, and whether they are voted out of office; but it remains unclear how they interact with legislatures outside these outstanding occasions. Considering their leading role, the mechanisms through which parliamentary actors may question them about their decisions, how these mechanisms operate, and how they affect the practice of accountability, remain surprisingly uncharted territory.

In response, this paper presents findings from a cross-national study of questioning mechanisms in 31 parliamentary democracies. Given the considerable empirical gap, this research assumed an exploratory mission, seeking to map the variation of questioning mechanisms, to classify them based on relevant dimensions, and to hypothesize effects of different procedural configurations for questioning and accountability. The first section discusses literature on prime ministers and questioning mechanisms, focusing on variables that are theoretically relevant for explaining how questioning mechanisms function. Building on the literature, the paper proposes a set of classifications of questioning mechanisms, exploring dimensions such as the setting (plenary or committee) and focus (individualised or collective) of mechanisms, as well as the degree of probing and exposure to which prime ministers are subjected. The subsequent sections discuss the methodology and findings, setting out potential explanations for cross-national patterns of variation.

### **1. Prime ministers and parliaments**

Prime ministers wield considerable authority in parliamentary systems, and fulfil multiple roles: head of government (Weller 1985; King 1994; Farrell 1988); chair of the cabinet; party leader and manager (Campbell 1982; Farrell 1988). As heads of government, prime ministers are expected to explain government decisions to the legislature, the media, and the electorate (Alley 1992; Mulgan 1997; Savoie 1999). Prime ministers are also spokespersons for their countries (Campbell 1982; Farrell 1988; Strangio et al. 2013) and chairs of coalitions (Andeweg 1991). Prime ministers also exercise power in personal capacity. For example, as head of government, the UK prime minister exercises a set of 'prerogative powers', which include managing the relationship between the government and the monarch, and between the government and the opposition; appointing ministers, awarding peerages and honours, and also foreign and defence functions (Hennessy 2000; Blick and Jones 2010; Cabinet Office 2010). Prime ministers are also highly visible political actors. The 'presidentialisation' thesis (Poguntke and Webb 2005) identified a cross-national trend of increasing leadership power resources for prime ministers, increased autonomy within parties and within governments, and a more pronounced focus on leadership in parliamentary elections. Given this accrual of public profile and authority, there is remarkably little understanding of how prime ministers are questioned and held accountable by legislatures.

The literature analysing prime ministers as political leaders has focused on comparing their power resources, either between countries (Rose 1991; Jones 1991; Sartori 1997; King 1994; O'Malley 2007), or relative to other institutional actors within particular countries. The direct relationship between prime ministers and legislatures has received limited attention in the comparative literature, aside from studies

on the UK (see for example Dunleavy et al. 1990, 1993; Burnham et al. 1994; Harris 2001; Bates et al. 2014; Lovenduski 2012; Bull and Wells 2012; Reid 2014; Bevan and John 2016; Kelso et. al 2016; Hazerika and Hamilton 2018; Waddle et al. 2019), Canada (Crimmins and Nesbitt-Larking 1996), Ireland (Elgie and Stapleton 2004) and Italy (Furlong 2004). Parliament can be a power resource (Jones 1991; O’Leary 1991; Smith 1991; Helms 2005), and an opportunity for self-presentation, exercising leadership (Rose 1982; Helms 2005), and sustaining authority (Foley 1993), but remains a forum to which prime ministers are accountable (Weller 2014). The mechanisms through which this accountability relationship is enacted and carried out – the rules and conventions that govern them, and how these are enacted in practice - have so far remained unstudied.

## **2. Questioning mechanisms**

Holding executives accountable is one of the key functions of legislatures, and a core premise of democratic politics. Accountability is defined as a deliberative (Olsen 2013), multi-stage process (Mulgan 2003; Bovens 2007; Akirav 2011; Mansbridge 2014) that involves explanation to be given by the responsible actor to a forum, which can then scrutinise the information provided (Bovens 2007;2010). Considering the complex nature of this process, understanding the mechanisms through which it is carried out is crucial for understanding how legislatures perform accountability.

### **Typologies and classifications**

The mechanisms through which parliamentarians may question prime ministers are a subset within the range of mechanisms that facilitate executive–legislative interaction. The literature has traditionally labelled such mechanisms as ‘oversight’ or ‘accountability’ mechanisms. In the rational-choice tradition, Bergman et al. (2003, p.110) define accountability mechanisms as devices through which principals can either acquire information about the agent’s intentions and behaviour, or sanction or reward the agent. Questioning mechanisms are indeed primarily designed to facilitate accountability, and to allow parliamentary actors to seek information and request explanations from the government; but they may also perform other functions, such as serving as a ‘safety valve’ or ‘tension release’ forum for the expression of criticism, and facilitating territorial representation (Wiberg 1995; Wiberg and Koura 1994; Russo and Wiberg 2011; Rozenberg 2011). Questioning mechanisms thus contribute to essential functions of legislatures such as accountability, conflict management, and representation (Packenham 1970; Mezey 1979; Loewenberg and Patterson 1979, Norton 1990; Kreppel 2010). To acknowledge this plurality of functions, this paper takes a step back from defining parliamentary questioning mechanisms functionally, as ‘accountability mechanisms’. I instead define ‘questioning mechanism’ procedurally, as parliamentary mechanisms that allow parliamentarians to pose questions to members of the executive. The literature provides some classifications of accountability mechanisms and of questioning mechanisms specifically (Russo and Wiberg 2011; Salmond 2014; Rasch 2011); but there has been no equivalent effort to identify and classify the specific questioning mechanisms that include prime ministers.

Existing classifications have identified variables that produce effects on the dialogue between parliamentarians and ministers during questioning. This paper identifies additional variables that potentially produce effects on questioning and accountability: the setting of questioning (plenary or committee), the focus of questioning (individual or collective), regularity, frequency, type of dialogue, and potential for probing. These variables are then used to build a typology (Collier et al. 2009), aiming to map the variation of questioning mechanisms, and to provide a starting point for explaining their variation.

### **1. What is the setting? Plenary or committee mechanisms**

Several studies distinguished between plenary and committee questioning mechanisms (Yamamoto 2008; Maffio 2002), but most classifications focus on plenary mechanisms such as oral questions (Russo and Wiberg 2011; Salmond 2014). Committee questioning mechanisms remain virtually unexplored (with the exception of Jensen 1994, Arter 2004, and Kelso et al. 2016). The setting in which questioning takes place is likely to have an important effect on the dynamics of questioning. Plenary mechanisms potentially allow a wider participation from parliamentarians, while committees involve a select participation, which means that a more diverse set of members gets to question the prime minister in the plenary, whilst in committee they may be questioned by a set of more experienced, specialised parliamentarians. The UK Parliament has introduced a committee mechanism (via the Liaison Committee) to complement the main plenary mechanism (PMQs), specifically in order to allow more focused scrutiny by exposing the Prime Minister to questioning from senior backbenchers (Kelso et al. 2016). Questioning in the plenary may potentially allow scrutiny on a wide range of topics and may take a general form. Questioning in committees potentially allows more specialised questioning, focusing on a few specific topics.

### **2. What is the focus? Collective or individualised mechanisms**

The nature of government in parliamentary democracies is collective. Prime ministers lead the government and are collectively responsible together with their cabinets, but in most systems they are not responsible for specific portfolios (Mayntz 1982; Rose 1982; Jones 1991; Andeweg 1991; Fiers and Krouel 2005). Instead, they are expected to answer for general directions of policy (Mayntz 1982; Rose 1982), and in some countries they also have a set of 'prerogative powers' for which they are personally responsible. Prime ministers are expected to account for their own actions, but they are also expected to speak for the government. Consequently, whether or not they are questioned individually or together with ministers who are responsible for specific policy areas is likely to have an important effect on the types of questions that parliamentarians ask prime ministers. An important step, therefore, in evaluating how prime ministers are questioned for their different responsibilities, is to distinguish between collective and individualised questioning mechanisms. Existing classifications have looked at who can ask questions, and how, but have not investigated who is subject to questioning: whether a mechanism allows questioning of one or several ministers, or of the prime minister. The UK PMQs remains the case with the richest literature (Chester and Bowring 1962; Dunleavy et al. 1990, 1993; Borthwick 1993; Harris 2001; Bates et al. 2014; Lovenduski 2012; Bull and Wells 2012; Reid 2014; Bevan and John 2016; Hazerika and Hamilton 2018; Waddle et al. 2019), but there has been much less research on collective mechanisms, with the exception of procedural descriptions in comparative studies focusing on Canada, Australia, and New Zealand (Weller 1985; McGowan 2008; Larkin 2012).

### **3. Regularity: Routine or exceptional**

An additional salient issue is that of **regularity**: How regularly are prime ministers questioned? This leads to a distinction between *routine* and *exceptional* questioning. The first implies that prime ministers are questioned recurrently, and hence on topical, current affairs. The second implies that MPs may summon prime ministers to parliament to answer questions on urgent matters when a significant event or fault occurs in the political system.

### **4. Frequency: How often are prime ministers questioned?**

Within *routine* questioning there may be varying degrees of **frequency**: prime ministers may be questioned more, or less often. They may be summoned to parliament several times within the same week, every week, once a month, or less often than once a month. This again may affect the types of issues

that are discussed: frequent questioning may be associated with topical, current affairs; less frequent questioning may involve a periodic round-up of key topics, as well as more long-term policy issues.

### 5. Type of dialogue

The **type of dialogue** configured through questioning refers to the requirement to give notice for questions. A mechanism is defined as requiring notice if members must submit questions in writing before the oral questioning session (Wiberg and Koura 1994; Yamamoto 2008; Salmond 2014; Russo and Wiberg 2011). If the question is known in advance (i.e. written notice is required, and questions are communicated to the prime minister's office ahead of the session), the dialogue is at least partially **scripted**, as the prime minister (or their office) will have prepared an answer and would be aware of potential follow-ups. If the question is not known (i.e. prior written notice is not required), the dialogue is predominantly **spontaneous**, as the prime minister could be aware of potential topics, given salient issues at the time, but would not know what the questions are.

### 6. Potential for probing

Another variable concerning dialogue with direct implications for accountability is the degree to which follow-up questions are allowed, and from whom. I define follow-up or supplementary questions as a subsequent question asked in connection to an initial question. The role of supplementary questions is to allow the initial questioner to ask a further question, or to allow other members to ask a question after the initial question and reply. This variable is important for assessing potential for probing - the extent to which a sustained line of questioning on each topic is possible, and from whom. Previous studies have also classified whether questioning mechanisms allow other parliamentarians to intervene after an initial question, but only included this as a dichotomous variable: supplementary questions allowed or not (Russo and Wiberg 2011; Salmond 2014). I argue that an additional level is needed: whether supplementary questions are allowed, and *from whom*. The latter is important for determining whether probing on a given topic may be done by a single member or by several.

## 3. Methodology

This paper draws on a cross-national survey of questioning mechanisms in parliamentary democracies. Building on theoretically relevant dimensions, the survey consisted of ten items addressing the setting (plenary or committee) and focus of each mechanism (collective or individual); regularity and frequency of questioning; and rules regarding the dynamic of questioning: the method and criteria for allocating questions, and rules regarding speaking time and content (see Appendix). The survey aimed to identify mechanisms in each country, and subsequently to describe and classify the ways in which rules, conventions and practice structure the dialogue between prime ministers and parliamentarians. I defined 'questioning mechanism' as a parliamentary mechanism that allows parliamentarians to address questions to the prime minister. The term 'prime minister' is used to denote the head of government in all countries included in the study.

The study focuses on democratic parliamentary systems in order to hold constant the delegation-accountability relationship between the legislative and the executive (Bergman et al. 2003; Laver and Shepsle 1999). The countries selected for the study are classified as 'parliamentary' (Beck et al. 2001), and also as democratic and 'Free' on the Polity IV and Freedom House indices. The study covers 31

countries.<sup>1</sup> The case selection strategy aimed to include democratic parliamentary systems, at the same time ensuring geographic variation.

The first stage of analysis involved a detailed examination of rules of procedure, as well as secondary literature for each country, in order to classify mechanisms on the survey dimensions. 59 oral questioning mechanisms were identified through this process.

The second stage involved contacting officials in each parliament in order to cover missing data and to document aspects of conventions and practice not covered in rules of procedure. During the first stage I compiled a detailed log of missing data and additional questions for each country, as well as a list of parliamentary outreach, research, or information offices for each country. The questions addressed to officials were divided into three categories: 1) validation – asking whether my interpretation of the rules of procedure matched practice; 2) specific data missing for each country; 3) further matters not covered by rules of procedure, such as the date when a questioning mechanism was established, whether there have been procedural reforms, and whether there are other aspects of procedure not covered by the survey that would be relevant for describing questioning mechanisms. I received detailed responses from 28 out of 31 countries.<sup>2</sup> I followed up with additional questions where clarifications were necessary. For example, if officials indicated that the prime minister may also be questioned by committees, and that was previously unclear from the rules of procedure, I asked them for examples of appearances of prime ministers before committees and topics that had been raised.

## 4. Survey findings

### 4.1. Setting and Focus: Committee or plenary/Individualised or collective

Table 1 and Figure 1 present all the oral questioning mechanisms that concern prime ministers available in the lower chamber in every country in the sample, according to whether they are set in the plenary or in committee, and whether they allow collective or individualised questioning.<sup>3</sup>

**Table 1. Setting and focus of questioning mechanisms**

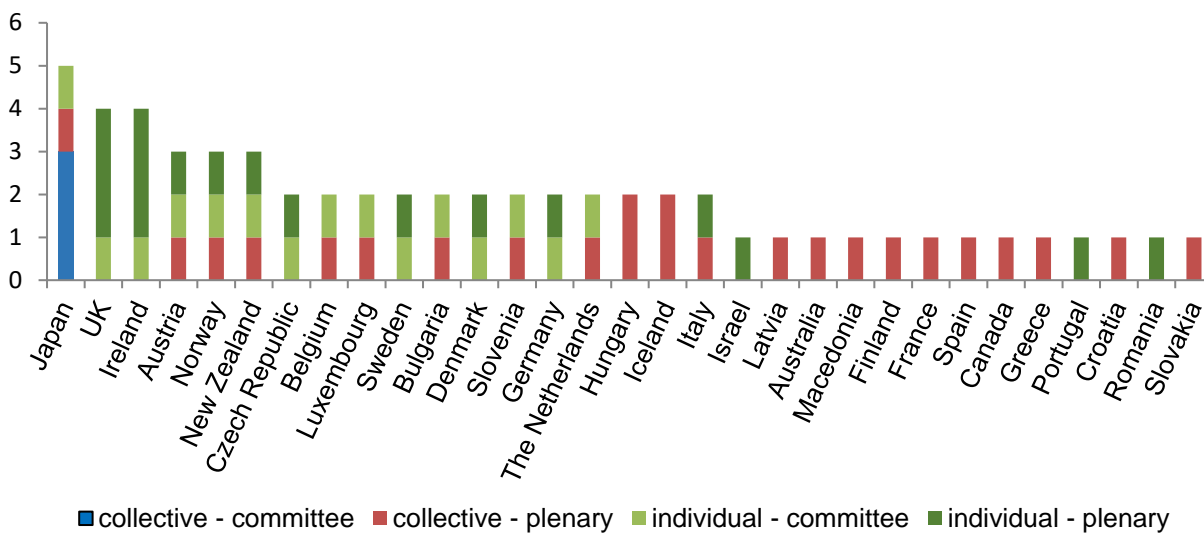
	Collective	Individualised	N
<b>Committee</b>	3	15	18
<b>Plenary</b>	24	17	41
<b>N</b>	<b>27</b>	<b>32</b>	<b>59</b>

<sup>1</sup> The list was compiled in June 2017, based on the 2017 Freedom in the World index. The initial sample comprised 34 countries. Two posed significant missing data problems: data for Botswana was missing entirely, including the absence of a website for the legislature. The data included in the English version of the rules of procedure of the Indian Lok Sabha was not sufficient to produce answers to the survey questions. Switzerland was excluded due to the collegial nature of government, which made it less comparable to the other countries in the sample.

<sup>2</sup> Responses covering France, Italy and Slovakia were less detailed than for the other 28 countries. These three cases were mainly analysed through parliamentary rules of procedure.

<sup>3</sup> All mechanisms were in operation in 2020, aside from the questioning mechanism in the Knesset, which operated between 2016-2019.

**Figure 1. Setting and focus of questioning mechanisms (N = 59)**



Every country presents at least one mechanism for questioning the prime minister; providing parliamentarians with an opportunity to ask questions is hence an essential component of the accountability relationship between prime ministers and parliaments. There is a clear preference for collective questioning: prime ministers are questioned together with ministers in 22 out of 31 countries. The preferred form of questioning prime ministers is one that allows wider participation in the public setting of the plenary, and potentially a focus on a broader range of topics: 41 out of 59 mechanisms are set in the plenary, and all the countries in the sample have a plenary procedure.

Out of the 41 plenary mechanisms, 24 are collective. Individualised plenary mechanisms are less frequent, occurring in only 13 countries. Out of these, the mechanisms in Italy, New Zealand and Austria are urgent questioning mechanisms, which require the presence of the prime minister only if MPs submit a question that requires them to answer personally. Hence only ten countries in the sample allow routine individualised questioning of the prime minister. Thus, while individual questioning of the prime minister, as the UK's PMQs, is not exceptional, nor is it common. Opting exclusively for a collective procedure may have historical reasons: given the development of the office of prime minister as a 'first among equals' in most parliamentary democracies, an individualised procedure may not have been considered necessary at the time when parliaments introduced questioning. Given the pressures on plenary time, it may have been preferable to provide one questioning opportunity for the whole cabinet, and not to offer a separate one for the prime minister.

The countries on the left side of Figure 1 present an exceptional variety of questioning mechanisms. In the UK and Ireland MPs may question prime ministers through multiple plenary mechanisms on a weekly basis: aside from Oral Questions to the Taoiseach, the Irish Dáil allows party leaders to question the Prime Minister at Leaders' Questions, and to inquire about the parliamentary agenda at Business Questions. Aside from the weekly PMQs, the UK Prime Minister may also be questioned after giving statements in the House of Commons, and may be addressed urgent questions. Both countries also allow questioning by committees, and Japan is the only country in the sample where the questioning of prime ministers takes place mainly in committees.

#### 4.2. Regularity and frequency of questioning

Two significant dimensions in classifying mechanisms are the regularity and frequency with which they are convened and allow parliament an opportunity to question the prime minister.

**Table 2. Regularity and frequency of questioning (N questioning mechanisms)**

<b>Regularity and frequency</b>	<b>Plenary</b>	<b>Committee</b>	<b>N</b>
<b>Routine</b>	<b>28</b>	<b>6</b>	<b>34</b>
Every sitting day	3	-	3
At least once a week	14	-	14
At least once a month	9	3	12
At least once a year	2	3	5
<b>Exceptional</b>	<b>13</b>	<b>12</b>	<b>25</b>
<b>N</b>	<b>41</b>	<b>18</b>	<b>59</b>

Table 2 and Figure 2 show that a considerable number of legislatures (25) provide a routine procedure, and a majority of them are plenary mechanisms: holding the prime minister to account on a regular basis is seen as necessary, and the preference is to do this in the open setting of the chamber.

In the case of individualised mechanisms, the presence of the prime minister is generally required, although in some cases ministers may occasionally deputise. In the case of collective mechanisms, prime ministers attend together with ministers, but need not attend on every occasion. Australia, Canada and New Zealand are unique with respect to the frequency with which they require prime ministers to engage with the legislature: they are expected to attend every daily sitting of Question Time, unless they have other engagements.

Some mechanisms are convened exceptionally. In the case of plenary mechanisms, this refers to urgent questions. The nature of accountability in exceptional mechanisms is qualitatively different: they allow parliamentarians to request the prime minister's presence in parliament to answer pressing or topical questions, rather than to discuss routine affairs. In some cases, this 'fire alarm' mechanism is the preferred form of interaction. For example, in the Austrian parliament, the Chancellor rarely attends the collective Question Time – sometimes less than once a year. Correspondence with officials indicated that this mechanism is considered perfunctory; instead, parliamentarians use urgent questions to summon the Chancellor to answer questions on specific issues. In the case of committees, this category includes cases where the rules of procedure allow committees to question the prime minister, but this is done infrequently or as and when the committee considers that a matter requires the presence of the prime minister.



**Figure 2. Questioning mechanisms that allow routine questioning (N=34)**

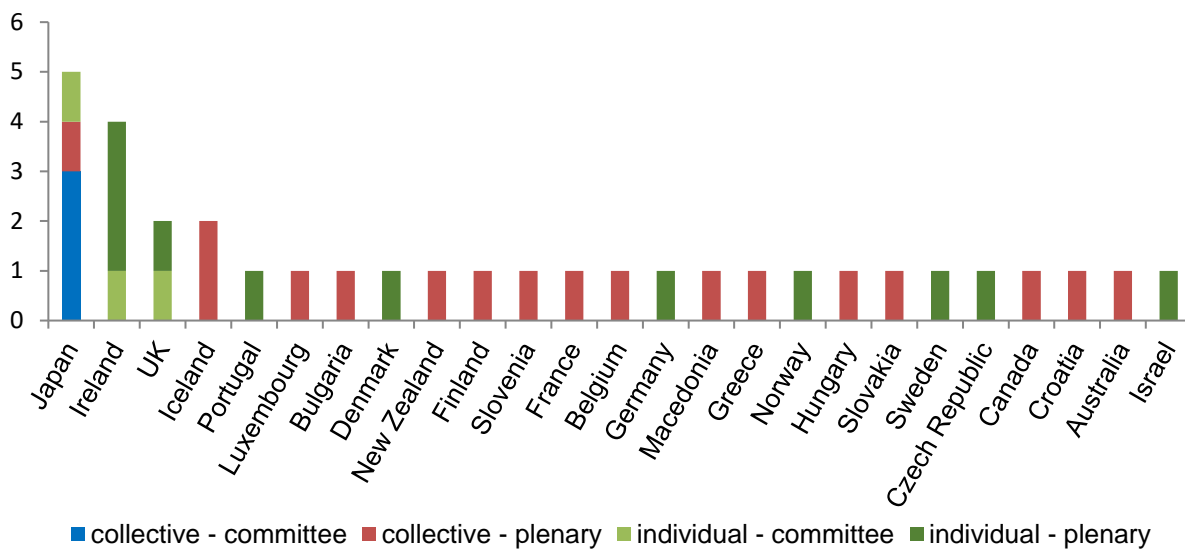


Table 2 and Figure 2 further demonstrate that the most frequent type of mechanism for routine questioning of prime ministers is the collective plenary mechanism.

Surprisingly few legislatures allow in-depth questioning of the prime minister in committees. Routine committee questioning is exceptional, and takes different forms. It was introduced either purposefully to complement plenary questioning with a mechanism that allows more in-depth scrutiny in the UK and in Ireland, or as a system of questioning in itself in Japan. The Liaison Committee in the UK comprises the Chairs of House of Commons Select Committees, and has held hearings with the Prime Minister two or three times a year since 2002 in order to complement the plenary PMQs with more in-depth scrutiny (Kelso et. Al 2016). The predominant focus on committee questioning makes Japan an exceptional case. The Prime Minister also attends oral questions in the plenary, but this is seen as less important than questioning in committee. Aside from the Joint Meeting of the Committees on Fundamental National Policies, which is convened several times a year, the Prime Minister is also regularly questioned by the Committee on Audit and Oversight of Administration, as well as by the Budget Committee. Among the surveyed mechanisms The Joint Meeting of the Committees on Fundamental National Policies is the only bicameral committee, comprising members from both houses. It was ostensibly inspired by the UK PMQs, but it only allows questioning from party leaders. A third case of routine committee questioning is Ireland. Modelled on the UK Liaison Committee, recent reforms to the Standing Orders of the Dáil (2016) introduced a requirement for the Taoiseach to appear before the Working Group of Committee Chairmen twice a year.

Other legislatures that allow committees to question prime ministers do so on an exceptional basis, and introduced committee questioning in order to complement the plenary by allowing more in-depth scrutiny on particular topics. In Sweden, the Prime Minister may occasionally be questioned by the Constitution Committee, which examines compliance with constitutional provisions. Similarly, the Prime Minister is not questioned routinely by committees in Norway, but their presence may occasionally be requested, particularly by the Standing Committee on Scrutiny and Constitutional Affairs. In Finland it is customary for the Prime Minister to appear before the EU Affairs Committee and the Foreign Affairs Committee ahead of EU Council meetings. In other cases, such as New Zealand, Denmark, Germany or the Netherlands, officials indicated that committees may in theory have the power to summon prime ministers for questioning, but this rarely happens in practice. Occasional committee questioning

responds to a need for more in-depth scrutiny on particular topics, without requiring this as a regular element in the prime minister’s relationship with the legislature. Being able to request such occasional questioning strengthens the legislature’s capacity to hold the prime minister to account.

### 4.3. Type of dialogue and probing

The requirement to give advance notice for questions and the permission to ask supplementary questions potentially have important implications for questioning and accountability. If parliamentarians must give written notice for questions, the topic is known in advance, and the dialogue has less spontaneity; but the prime minister is also able to provide more specific information in response to questions. This initial exchange is most effective if members are allowed to probe the answer provided through supplementary questions. If questions do not require notice, the topic is not known in advance, and the degree of spontaneity and of exposing the prime minister to unknown questions is higher. Table 3 summarises the distribution of all plenary mechanisms according to these categories.

**Table 3. Written notice and supplementary questions (N questioning mechanisms)**

	<b>No probing</b>	<b>On each question, probing may come from initial questioner only</b>	<b>On each question, probing may come from initial questioner initially, other members subsequently</b>	<b>On each question, probing may come from any members present</b>	<b>N</b>
<b>Notice required</b>	<b>Bulgaria</b> (Oral Questions) <b>Croatia</b> (Morning Question Time) <b>Italy</b> (Oral questions) <b>Italy</b> (Urgent Questions) <b>Luxembourg</b> (Question Hour) <b>Hungary</b> (Oral Questions) <b>Hungary</b> (Prompt Question Hour)	<b>Austria</b> (Urgent Questions) <b>Belgium</b> (Question Time) <b>Czech Republic</b> (Verbal interpellations) <b>Greece</b> (Current Questions) <b>Macedonia</b> (Oral Questions) <b>New Zealand</b> (Urgent Questions) <b>Slovakia</b> (Question Time) <b>Slovenia</b> (Oral Questions) <b>Spain</b> (Oral Questions) <b>Norway</b> (Ordinary Question Time) <b>Portugal</b> (Prime Ministerial debates) <b>Japan</b> (Oral questions)	<b>Austria</b> (Question Time) <b>Germany</b> (Questions to the Federal Chancellor) <b>Ireland</b> (Oral questions to the Taoiseach) <b>The Netherlands</b> (Question Time) <b>Norway</b> (Oral Question Time) <b>Romania</b> (Prime Ministerial Debates) <b>UK</b> (Urgent Questions) <b>Iceland</b> (Oral questions with notice) <b>Latvia</b> (Oral Questions)	<b>New Zealand</b> (Oral Questions)	<b>29</b>
<b>Notice not required</b>	<b>France</b> (Questions to the Government) <b>Finland</b> (Question Time) <b>Ireland</b> (Business Questions to the Taoiseach) <b>Israel</b> (Question Hour)	<b>Canada</b> (Question Period) <b>Ireland</b> (Leaders’ Questions) <b>Sweden</b> (Question Time) <b>Iceland</b> (Oral Questions without notice) <b>UK</b> (PMQs)	-	<b>Australia</b> (Question Time) <b>Denmark</b> (Prime Minister’s Question Hour) <b>UK</b> (Prime Ministerial statements)	<b>12</b>
<b>N</b>	<b>11</b>	<b>17</b>	<b>9</b>	<b>4</b>	<b>41</b>

A majority of questioning mechanisms require prior notice for questions (29 out of 41) and allow supplementary questions (30 out of 41). In mechanisms that do not allow follow-ups, the dialogue is restricted to single exchanges, either on a question submitted in advance, as in Bulgaria, Greece and Hungary, or on a question asked spontaneously, as in France, Finland and Sweden. Given that only such brief Q-and-A exchanges are allowed, this type of mechanism may allow more questions in a session, but limits probing to a single exchange between the prime minister and the initial questioner.

Permitting supplementary questions potentially allows more time for engagement with a topic, as well as further probing. The dialogue is still restricted to an exchange between the prime minister and the initial questioner for countries in the second column. In the UK, the member who poses a question is entitled to ask a supplementary, particularly if they have submitted a substantive question in the shuffle (Kelly 2015). In practice, the Leader of the Opposition is allowed six supplementary questions, and the leader of the second opposition party is allowed two, but the Q-and-A exchanges between the Prime Minister and backbenchers very rarely involve a supplementary question. Probing takes place in single Q-and-A exchanges between the Prime Minister and the questioner – hence the inclusion of PMQs in the second column.

By allowing other members to intervene after the initial supplementary, mechanisms in columns three and four extend the potential for probing considerably on each topic. The rules corresponding to mechanisms in the third column specify that the member who asks a question is the first who is recognised to ask a follow-up, and other members may be recognised subsequently. In most cases this provision is enforced strictly: in Ireland, at Oral Questions to the Taoiseach, the member who has submitted a question on a particular topic is the first recognised by the Speaker to ask a supplementary question; other members may intervene thereafter. In Australia, supplementary questions are permitted from any member present at Question Time. In practice, they are requested very rarely, and members prefer to use other procedural artifices, for example requesting a Point of Order and asking the prime minister to return to the question and clarify their answer. Another tactic frequently used is for different opposition parliamentarians to repeat questions on the same topic throughout the session. These patterns underline the importance of conventions and practice in the operation of parliamentary mechanisms, and point towards different types of questioning and accountability depending on combinations of procedural features.

#### 4.4. Questioning exposure

The next step in building a typology of questioning mechanisms is to map the combined effect of variables that affect questioning and accountability. How is the prime minister questioned in mechanisms with combinations of a) more or less spontaneous questions; b) more or less probing? An additional relevant variable is the frequency with which the procedure is convened. The operation of these variables described in previous sections points to a measure of **questioning exposure**. Building on the variables identified in the literature review, I define questioning exposure as the degree to which prime ministers are subject to a frequent questioning exercise that requires them to respond unscripted, on the spot, and with extended participation from parliamentarians. This measure applies to routine plenary procedures (N=28, Table 2), as these mechanisms are the most established and regular point of engagement between the prime minister and the legislature across countries included in this study. Measuring questioning exposure in routine plenary procedures comprises the following dimensions:

1. *Type of dialogue and potential for probing*: the degree to which the dialogue is scripted (written notice required) or spontaneous (written notice not required); whether supplementary questions are allowed or not; and who is allowed to ask supplementary questions

## 2. Frequency of questioning.

Based on this definition, we may hypothesize potential effects of different combinations of procedural features on the level of questioning exposure. Firstly, the prime minister may be less exposed in a scripted questioning procedure, where they are aware of topics in advance, as opposed to a spontaneous questioning procedure, where they face questions on the spot. The degree of exposure is lower if supplementary questions are not allowed, and increases as more members are allowed to intervene. A mechanism convened more frequently potentially provides higher exposure than one convened less frequently. The level of exposure has important implications for the type of accountability facilitated by different questioning mechanisms.

**Table 4. Exposure through questioning: building the categories**

	Supplementary questions	
	Not allowed	Allowed
Notice required	<i>Low exposure</i>	<i>Moderate exposure</i>
Notice not required	<i>Moderate exposure</i>	<i>High exposure</i>

**Table 5. Questioning exposure and frequency (N questioning mechanisms)**

Frequency	Questioning exposure			N
	Low	Moderate	High	
At least once a year	-	Germany (Questions to the Federal Chancellor) Israel (Question Hour)	-	2
At least once a month	-	Belgium (Question Time) Japan (Oral Questions) Macedonia (Oral Questions) Norway (Ordinary Question Time) Portugal (Prime ministerial debates) Slovakia (Question Time) Slovenia (Oral Questions)	Denmark (Prime Minister's Question Hour) Sweden (Question Time)	9
At least once a week	Bulgaria (Oral Questions) Luxembourg (Question Hour) Hungary (Oral Questions) Croatia (Morning Question Time)	Czech Republic (Verbal interpellations) Greece (Current Questions) Iceland (Oral questions with notice) Ireland (Oral Questions to the Taoiseach) France (Questions to the Government) Finland (Question Time) Ireland (Business Questions)	Iceland (Oral questions without notice) Ireland (Leaders' Questions) UK (PMQs)	14
Every sitting day	-	New Zealand (Oral Questions)	Canada (Question Period) Australia (Question Time)	3
N	4	17	7	28

Most parliaments provide mechanisms that subject prime ministers to a moderate level of exposure, and this is distributed relatively evenly between less frequent, but still regularised questioning at least once a month, and frequent questioning at least once a week. This distribution raises questions about the roles performed by different types of mechanisms – particularly in connection to the type of accountability they facilitate.

Firstly, mechanisms that allow high exposure and frequent questioning such as those in Canada, Australia, and the UK, may be quite effective in scrutinising the prime minister on current affairs – they are 'routine check-up' mechanisms. Their primary role is to require the prime minister to demonstrate

their grasp of current affairs. Mechanisms with high exposure but lower frequency, as in Denmark and Sweden, may have the role to create a 'monthly round-up' of topical affairs. Given that members are required to submit questions in writing, the role of mechanisms with moderate exposure but convened frequently may be to create a more structured weekly or monthly dialogue, and to raise more long-term policy issues, whilst also allowing room for topical affairs.

The functions of low exposure, frequent mechanisms, are less clear based simply on this classification. Questions that require written notice but allow no follow-ups, each week, may lead to scripted, closed exchanges, which allow very little dialogue between the prime minister and parliamentarians. This type of questioning that does not allow probing potentially leads to a perfunctory, weak form of accountability.

Prime ministers may also be more or less exposed to questioning at the system level: in countries such as Ireland, the UK and Japan, where they are questioned through multiple plenary and committee mechanisms, prime ministers are arguably more exposed to questioning than in countries where there is only one mechanism available, such as Canada and Australia.

## **5. Conclusions**

This paper presents the first comparative study of the mechanisms through which parliamentarians may question prime ministers in parliamentary democracies, beginning to fill an important empirical gap. All 31 legislatures included in the study provide at least one mechanism for routine questioning of the prime minister, confirming that this is a key component of the politics of parliamentary democracies. As prime ministers have historically engaged less with parliament outside questioning occasions (Dunleavy et al. 1990, 1993; Crimmins and Nesbitt-Larking 1996; Elgie and Stapleton 2004), providing routine points of engagement ensures the regularity of parliamentary accountability. Despite some similarities among Westminster legislatures, there is no clearly distinguishable 'Anglophone' or 'European' cluster in terms of how legislatures organise their relationship with the prime minister. One notable pattern is the disposition of Nordic countries towards individualised questioning – Norway, Sweden and Denmark all allow individualised questioning of the prime minister. Future research could explore differences between countries further, and trace what drives them.

The relationship between prime ministers and legislatures takes various formats, each with different implications for accountability, as well as for the prime minister's engagement with the legislature. Some countries, for example Canada and Australia, but also Greece, Spain, and France, only provide one mechanism, whilst others organise questioning through multiple mechanisms. Notably among parliamentary democracies, Ireland and the UK present an exceptional variety of questioning mechanisms. In the UK, the Liaison Committee was introduced specifically in order to facilitate more in-depth scrutiny compared to the plenary PMQs (Kelso et al. 2016). In Ireland, Leaders' Question was introduced to allow more spontaneous, topical questioning than Oral Questions to the Taoiseach (MacCarthaigh 2005). The UK and Ireland also remain outliers in providing exclusively individualised questioning, with the prime minister questioned separately from ministers.

This variation among single and multiple mechanisms within countries, as well as the tendency to introduce procedures that perform complementary roles, raises questions about which configuration of mechanisms is more effective and increases the degree to which the prime minister is held to account by the legislature. The notion of 'effectiveness', understood as the degree to which a particular mechanism performs its intended role adequately, and produces the desired effects, is of interest in both academic and practitioner legislative studies. If the primary function of questioning is to hold prime ministers to account for their decisions, an effective mechanism would need to facilitate a dialogue that involves

primarily exchanges of information, and which facilitates focus on matters for which prime ministers are personally or jointly responsible. Frequent and extensive questioning may certainly create scope for accountability, but does not necessarily involve a productive exchange of information. For example, even though the Australian Question Time requires the prime minister to attend at every sitting, observers of the Australian parliament have noted that '[i]t is not well designed to perform as an accountability forum and it was never really intended to perform that role' (Uhr 1998, p. 199). So how can legislatures hold prime ministers to account effectively?

The key insight from the variation explored in this paper is that, depending on their procedural features, questioning mechanisms may perform different roles in political systems, and may facilitate different types of accountability: allowing a routine dialogue on topical affairs, a 'check-up' on the prime minister's grasp of current affairs, or in-depth scrutiny targeting specific matters or long-term policy issues. Consequently, a combination of different types of questioning mechanisms would arguably be the most effective. The various aspects of prime ministerial responsibility need to be covered from different angles, and through distinct mechanisms: by allowing parliamentarians an opportunity for routine, topical questions; by providing a forum, either in the plenary or in committee, for more long-term, strategic policy issues and in-depth scrutiny; and by providing mechanisms which allow parliamentarians to summon prime ministers to parliament in the case of exceptional events. A combination of routine and exceptional questioning, in plenary and in committee, is hence likely to allow both the necessary regular dialogue with the prime minister on topical affairs as well as more in-depth scrutiny. Having a diverse range of tools that allows parliamentarians to scrutinise various aspects of prime ministerial activity strengthens the legislature's accountability function.

Additionally, questioning mechanisms may also contribute to other functions of legislatures, aside from accountability. The often-criticised adversarial nature of exchanges during PMQs in the UK or Question Time in Australia indicates that these mechanisms perform an important 'safety valve' or 'tension release' function, and contribute to conflict management. In systems with a strong constituency link, parliamentarians may also use question to the prime minister to highlight issues with direct local relevance. Consequently, the key challenge in measuring effectiveness is to place the performance of accountability within the context of the other functions performed by a particular questioning mechanism.

Crucially, different types of questioning mechanisms place different demands on the prime minister's engagement with the legislature. An important part of the prime minister's role across parliamentary democracies is to explain government decisions to the legislature (Alley 1992; Mulgan 1997; Savoie 1999; Weller 2014). The parameters of their relationship with the legislature have an important effect on the responsibilities associated with the office. In countries that require frequent questioning and high levels of exposure, such as the UK, Canada, Australia, and Ireland, the prime minister's role involves sustained engagement with parliament. Office holders in such countries are required to be constantly aware of developments across government policy, as it is their responsibility to explain and defend them to the legislature. Preparing for questioning, and for presenting themselves in the legislature, is a permanent part of the prime minister's diary. The requirement for such frequent engagement is a constant test of the prime minister's ability, and their leadership profile may depend on their performance at Question Time. Other legislatures maintain a requirement for the prime minister to answer questions, but this forms a less prominent part of their job. Coming to parliament once a month, or once every few months, to explain government decisions, places considerably less emphasis on managing the relationship with the legislature as part of the prime minister's role. This also applies to cases where questioning mechanisms provide low exposure and weaker forms of accountability.

By identifying types of questioning mechanisms, and by mapping procedural features that affect the process of questioning, this paper has revealed significant variation in how the relationship between prime ministers and legislatures is configured. These findings provide a starting point for thinking about how to design effective parliamentary mechanisms for holding prime ministers to account, with implications for procedural reform and for executive-legislative relations.

## References

- Akirav, O. (2011). The use of parliamentary questions in the Israeli parliament, 1992–96. *Israel Affairs*, 17(02), 259-277.
- Alley, R. (1992). 'The Powers of the Prime Minister' in Gold, H. (1985). *New Zealand politics in perspective*. Auckland: Longman Paul, pp.85-93.
- Andeweg, R. B. (1991). The Dutch prime minister: Not just chairman, not yet chief?. *West European Politics*, 14(2), 116-132.
- Arter, D. (2004). The prime minister in Scandinavia: 'superstar' or supervisor?. *The Journal of Legislative Studies*, 10(2-3), 109-127.
- Bates, S., Kerr, P., Byrne, C. and Stanley, L. (2014). 'Questions to the Prime Minister: A Comparative Study of PMQs from Thatcher to Cameron, *Parliamentary Affairs*, 67, 253-280.
- Beck, T., Clarke, G., Groff, A., Keefer, P., and P. Walsh (2001). New tools in comparative political economy: The Database of Political Institutions, *World Bank Economic Review*. 15(1), 165-176.
- Bergman T., Muller W., K. Strom and M. Blomgren (2003). 'Democratic Delegation and Accountability: Cross-national patterns' in K. Strom, Muller W., and Bergman T., (Eds.) *Delegation and Accountability in Parliamentary Democracies*, Oxford: Oxford University Press, pp.109-220.
- Bevan, S., & John, P. (2016). Policy representation by party leaders and followers: what drives UK Prime Minister's Questions?. *Government and Opposition*, 51(1), 59-83.
- Blondel, J. (1988). 'Introduction' in Blondel, J., Muller-Rommel, F. (Eds.) (1988) *Cabinets in Western Europe*, Basingstoke: Macmillan, pp.1-15.
- Borthwick, R. L. (1993). On the Floor of the House. In Franklin P., Norton, P. (Eds.) (1993) *Parliamentary Questions*, Oxford: Clarendon Press, pp. 73-103.
- Bovens, M. (2007). Analysing and assessing accountability: a conceptual framework. *European law Journal*, 13(4), 447-468.
- Bovens, M. (2010). Two Concepts of Accountability: Accountability as a Virtue and as a Mechanism, *West European Politics*, 33(5), 946-967.
- Bull, P., & Wells, P. (2012). Adversarial discourse in prime minister's questions. *Journal of Language and Social Psychology*, 31(1), 30-48.
- Burnham, J., Jones, G. W., & Elgie, R. (1995). The Parliamentary Activity of John Major, 1990–94. *British Journal of Political Science*, 25(4), 551-563.
- Cabinet Office (2011). *The Cabinet Manual*, London: Cabinet Office). 1st ed. [ebook] Available at: <https://www.gov.uk/government/publications/cabinet-manual> (Accessed 23/08/2019)



Campbell, C. (1982). 'Political Leadership in Canada: Pierre Elliott Trudeau and the Ottawa Model' in Rose, R., Suleiman, E.N. (Eds.) (1982) *Presidents and Prime Ministers*, American Institute for Public Policy Research, pp. 50-93.

Chester, D. N., Bowring, N. (1962). *Questions in Parliament*. Clarendon Press.

Collier, D., Jody Laporte, and Jason Seawright (2009). "Typologies: Forming Concepts and Creating Categorical Variables." In Box-Steffensmeier J., Brady, H., and David Collier (Eds.) (2009) *The Oxford Handbook of Political Methodology*, Oxford University Press. Available at <http://www.oxfordhandbooks.com/view/10.1093/oxfordhb/9780199286546.001.0001/oxfordhb-9780199286546-e-7>; (Accessed 02/06/2016)

Crimmins J. and P. Nesbitt-Larking, (1996). Canadian Prime Ministers in the House of Commons: Patterns of Intervention. *The Journal of Legislative Studies*, 2, 45-171.

Damgaard, E. (1994). Parliamentary questions and control in Denmark, in Wiberg, M. (1994) (Ed.) *Parliamentary Control in the Nordic Countries*, Helsinki: The Finnish Political Science Association, pp.19-43.

Dios, M., & Wiberg, M. (2011). Questioning in European parliaments. *The Journal of Legislative Studies*, 17(3), 354-367.

Dunleavy, P., Jones, G. W., & O'Leary B. (1990). Prime Ministers and the Commons: Patterns of behaviour, 1868 to 1987. *Public Administration*, 68(1), 123-139.

Dunleavy, P., G.W. Jones with J. Burnham, R. Elgie and P. Fysh (1993). Leaders, Politics and Institutional Change: The Decline of Prime Ministerial Accountability to the House of Commons, 1868-1990, *British Journal of Political Science*, 23, 267-98.

Elgie R., Stapleton J. (2004). The parliamentary activity of the head of government in Ireland (1923-2000) in comparative perspective. *The Journal of Legislative Studies*, 10(2-3), 154-173.

Farrell, B. (1988). 'Ireland: The Irish Cabinet System: More British than the British Themselves' in Blondel, J., Muller-Rommel, F. (Eds.) (1988) *Cabinets in Western Europe*, Basingstoke: Macmillan, pp.33-46.

Foley, M. (1993). *The rise of the British presidency*. Manchester: Manchester University Press.

Franklin M, Norton, P., (1993.) 'Questions and Members' in M. Franklin and P. Norton, (Eds.) (1993), *Parliamentary Questions*, Oxford: Clarendon Press, pp.104-122

Freedom House (2017). Freedom House, 'Freedom in the World 2017', <https://freedomhouse.org/report-types/freedom-world> (Accessed 27/05/2017)

Furlong, P. (2004). Institutional fragmentation in parliamentary control: the Italian case. *The Journal of Legislative Studies*, 10(2-3), 174-192.

- Harris, S. (2001). Being politically impolite: extending politeness theory to adversarial political discourse. *Discourse & Society*, 12(4), 451-472.
- Hazerika, A., Hamilton, T. (2018). *Punch and Judy Politics? An Insider's Guide to Prime Minister's Questions*, London: Biteback Publishing.
- Helms, L. (2005). *Presidents, Prime Ministers and Chancellors*, Basingstoke: Palgrave Macmillan.
- Hennessy, P. (2001). *The Prime Minister: The Office and its Holders Since 1945*, London: Allen Lane.
- Jensen, H. (1994). 'Committees as Actors or Arenas? Putting Questions to the Danish Standing Committees' in Wiberg, M. (1994) (Ed.) *Parliamentary Control in the Nordic Countries*, Helsinki: The Finnish Political Science Association, pp.77-102.
- Jones, G.W. (1991). West European prime ministers in perspective. *West European Politics*, 14(2), 163-178.
- Kelly, R. (2015). 'Prime Minister's Questions', House of Commons Briefing Papers, House of Commons Library, SN/PC/05183, 9 February 2015.
- Kelso, A., Bennister, M., & Larkin, P. (2016). The shifting landscape of prime ministerial accountability to parliament: An analysis of Liaison Committee scrutiny sessions. *The British Journal of Politics and International Relations*, 18(3), 740-754.
- King, A. (1994). 'Chief Executives in Western Europe', in Budge, I. and D. McKay (1994) (Eds.), *Developing Democracy*. London: Sage.
- Kreppel, A. (2010). 'Legislatures' in Caramani, D. (Ed.) *Comparative Politics*, Oxford: Oxford University Press, pp.113-130.
- Larkin, P. (2012). 'Ministerial Accountability to Parliament' in Dowding, K., Lewis, C. (Eds.) (2012) *Ministerial Careers and Accountability in the Australian Commonwealth Government*, Canberra: ANU Press.
- Laver M. , Shepsle, K. (1999). 'Government Accountability in Parliamentary Democracy' in A. Przeworski, Susan Stokes, B. Manin (Eds.) (1999) *Democracy, Accountability, and Representation*, Cambridge: Cambridge University Press, pp.279-296.
- Laver, M., & Marsh, M. (1993). 'Parties and voters' in John Coakley and Michael Gallagher (Eds.) *Politics in the Republic of Ireland*. 2nd edition, PSAI Press and Folens, pp. 104-25.
- Lijphart, A. (1999). *Patterns of Democracy*. New Haven and London. Yale Univesity Press.
- Loewenberg G., Patterson S., (1979). *Comparing Legislatures*, Boston: Little, Brown and Co.
- Lovenduski, J. (2012). Prime Minister's questions as political ritual. *British Politics*, 7(4), 314-340.

- MacCarthaigh, M. (2005). Accountability in Irish parliamentary politics. Institute of Public Administration.
- Maffio, R., (2002). Quis custodiet ipsos custodes? Il controllo parlamentare dell'attività di governo in prospettiva comparata. *Quaderni di Scienza Politica*, 9 (2), pp. 333–383. Cited in Russo F., & Wiberg M., (2011). Parliamentary Questioning in 17 European Parliaments: Some Steps towards Comparison, *The Journal of Legislative Studies*, 16(2), 215-232.
- Malloy, J. (2004). The executive and parliament in Canada. *The Journal of Legislative Studies*, 10(2-3), 206-217.
- Mansbridge, J. (2014). 'A Contingency Theory of Accountability' In Bovens, M., Goodin, R. E., Schillemans, T. (Eds.). (2014). *The Oxford handbook of public accountability*. Oxford: Oxford University Press. Available at <https://www.oxfordscholarship.com/> (Accessed 3/09/2019)
- Mattson, I. (1994). 'Parliamentary Questioning in the Swedish Riksdag' in Wiberg, M. (1994) (Ed.) *Parliamentary Control in the Nordic Countries*, Helsinki: The Finnish Political Science Association, pp.276-356.
- Mayntz, R. (1982). 'Executive Leadership in Germany: Dispersion of Power or 'Kanzlerdemokratie'?' in Rose, R., Suleiman, E.N.(Eds.) (1982) *Presidents and Prime Ministers*, American Institute for Public Policy Research, pp.139-170.
- McGowan, A. (2008). Accountability or inability: to what extent does House of Representatives question time deliver executive accountability comparative to other parliamentary chambers? Is there need for reform?. *Australasian Parliamentary Review*, 23(2), 66.
- Mezey, M. L. (1979). *Comparative legislatures* (Vol. 6). Duke University Press
- Mulgan R. (2003). *Holding Power to Account: Accountability in Modern Democracies*, Basingstoke and New York: Palgrave Macmillan.
- Norton, P. (1990). Parliaments: A framework for analysis. *West European Politics*, 13(3), 1-9.
- O'Brien, A., Bosc, M., (2017). *House of Commons Procedure and Practice*, 3rd edition, available at: <http://www.ourcommons.ca/About/ProcedureAndPractice3rdEdition/index-e.html> (Accessed 23/08/2019)
- O'Malley E. (2007). The Power of Prime Ministers: Results of an Expert Survey. *International Political Science Review*, 28(1), 7-27.
- O'Leary, B. (1991). An Taoiseach: The Irish prime minister. *West European Politics*, 14(2), 133-162.
- Olsen, J. P. (2013). The institutional basis of democratic accountability. *West European Politics*, 36(3), 447-473.

- Packenhams, R.A., (1970) 'Legislatures and political development' in A. Kornberg and L. D. Musolf, (Eds.) *Legislatures in Developmental Perspective* (Durham, NC: Duke University Press), pp. 521-582.
- Pelizzo R., Stapenhurst R., (2012). *Parliamentary oversight tools: a comparative analysis*, London: Routledge.
- Pelizzo, R; Stapenhurst, R. and Olson, D., (2006). "Parliamentary Oversight for Government Accountability" (2006). Research Collection School of Social Sciences. Paper 137 Available at [http://ink.library.smu.edu.sg/soss\\_research/137](http://ink.library.smu.edu.sg/soss_research/137) (Accessed 7/11/2018)
- Pennings, P. (2000). 'Parliamentary control of the executive in 47 countries' 28th Joint Sessions of Workshops of the European Consortium for Political Research, 14-19 April 2000
- Poguntke, T., Webb, P. (2005). 'The Presidentialization of Politics in Democratic Societies': A framework for analysis' in Poguntke, T., Webb, P. (Eds.) (2005) *The Presidentialization of Politics: A Comparative Study of Modern Democracies*, Oxford: Oxford University Press, pp.1-25.
- Polity IV: 'Polity IV Project: Political Regime Characteristics and Transitions, 1800–2014', <http://www.systemicpeace.org/polityproject.html> (Accessed 23/08/2019)
- Rasch, B. E. (2011). Behavioural consequences of restrictions on plenary access: Parliamentary questions in the Norwegian Storting. *The Journal of Legislative Studies*, 17(3), 382-393.
- Rasch, E. (1994). 'Question Time in the Norwegian Storting – Theoretical and Empirical Considerations', in Wiberg, M. (1994) (Ed.) *Parliamentary Control in the Nordic Countries*, Helsinki: The Finnish Political Science Association, pp.247-275.
- Reid, C. (2014). 'Rhetoric and Parliamentary Leadership – Prime Minister's Questions', in Atkins J. et al. (2014) (Eds.) *Rhetoric in British Politics and Society*, Palgrave Macmillan, pp.45-57.
- Riddell, P. (2004). Prime Ministers and Parliament. *Parliamentary Affairs*, 57(4),814-829.
- Rose, R. (1982). British Government: The Job at the Top, in Rose, R., Suleiman, E.N.(Eds.) (1982) *Presidents and Prime Ministers*, American Institute for Public Policy Research, pp. 1-49.
- Rush, M. (2014). Engaging with the enemy: The parliamentary participation of party leaders, 1945–2010. *Parliamentary Affairs*, 67(4), 751-766.
- Russo F., & Wiberg M., (2011). Parliamentary Questioning in 17 European Parliaments: Some Steps towards Comparison, *The Journal of Legislative Studies*, 16(2), 215-232.
- Salmond, R. (2014). Parliamentary Question Times: How Legislative Accountability Mechanisms Affect Mass Political Engagement, *The Journal of Legislative Studies*, 20(3), 321-341.
- Sartori, G., (1997) *Comparative Constitutional Engineering. An Inquiry into Structures, Incentives and Outcomes*, Second Edition, Basingstoke: Palgrave Macmillan.

- Smith, G. (1991). The resources of a German chancellor. *West European Politics*, 14(2), 48-61.
- Strom, K. (2003) 'Parliamentary Democracy and Delegation' in Strom K., Muller W., Bergman T., (2003) *Delegation and Accountability in Parliamentary Democracy*, Oxford: Oxford University Press, pp. 55-108.
- Uhr, J. (1998) *Deliberative Democracy in Australia. The changing place of Parliament*, Cambridge: Cambridge University Press.
- Waddle, M., Bull, P., & Böhnke, J. R. (2019). 'He Is Just the Nowhere Man of British Politics': Personal Attacks in Prime Minister's Questions. *Journal of Language and Social Psychology*, 38(1), 61-84.
- Weller, P. (1985). *First Among Equals: Prime Ministers in Westminster Systems*, Sydney, Australia: George Allen & Unwin.
- Weller, P. (1989). *Malcolm Fraser PM: A Study in Prime Ministerial Power in Australia*, Penguin Books.
- Weller, P. (2014). 'The Variability of Prime Ministers' in Rhodes, R., t'Hart, P. (2014) (Eds.) *The Oxford Handbook of Political Leadership*, Oxford Handbooks Online, <http://www.oxfordhandbooks.com/view/10.1093/oxfordhb/9780199653881.001.0001/oxfordhb-9780199653881>. (Accessed 14/03/2019)
- Wright, B., Fowler, P. (2012). *House of Representatives Practice*, 6th edition, Canberra: Department of the House of Representatives, available at: [https://www.aph.gov.au/About\\_Parliament/House\\_of\\_Representatives/Powers\\_practice\\_and\\_procedure/Practice7/HTML](https://www.aph.gov.au/About_Parliament/House_of_Representatives/Powers_practice_and_procedure/Practice7/HTML) (Accessed 2/05/2019)
- Yamamoto H. (2008). 'Tools for Parliamentary Oversight. A comparative study of 88 national parliaments' International Parliamentary Union.

# Appendix

## 1. Survey questions

This paper reports on questions 1-6 and 8.

### Macro-level rules: Setting, focus, regularity and frequency

1. What are the mechanisms that allow parliamentary actors to question prime ministers in this parliament?
2. What is the setting in which the questioning takes place: plenary or committee?
3. How is the prime minister questioned: individually, or together with other ministers?
4. Are there any requirements, either in written rules of procedure, or in conventions, regarding the attendance of the prime minister? To what extent are they required to attend procedures?
5. How often is the procedure convened?
6. What is the duration of the procedure?

### Micro-level rules: Notice, follow-up, time and content

7. What are the rules regarding the participation of parliamentary actors?
  - 7.1. What is the method for allocating questions?
  - 7.2. What are the criteria for deciding question allocation?
8. What are the rules regarding questions?
  - 8.1. Are questions submitted in advance? If yes, how long in advance?
  - 8.2. Are follow-up questions permitted? If yes, from whom?
  - 8.3. Are spontaneous questions permitted?
  - 8.4. Are there any restrictions regarding speaking time?
  - 8.5. Are there any restrictions regarding the content of the question?
9. What are the rules regarding answers and interventions by the prime minister?
  - 9.1. Are there any restrictions regarding speaking time?
  - 9.2. Are there any restrictions regarding the content of the answer?

## 2. List of countries

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1. Australia	10. France	19. Latvia	28. Slovenia
2. Austria	11. Germany	20. Luxembourg	29. Spain
3. Belgium	12. Greece	21. Macedonia	30. Sweden
4. Bulgaria	13. Hungary	22. Netherlands	31. UK
5. Canada	14. Iceland	23. New Zealand	
6. Croatia	15. Ireland	24. Norway	
7. Czech Republic	16. Israel	25. Portugal	
8. Denmark	17. Italy	26. Romania	
9. Finland	18. Japan	27. Slovakia	

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