

A Comparative Study of the Political Systems of the United Kingdom and Japan

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Abstract. The United Kingdom—often treated as the prototypical parliamentary polity—and Japan, which developed its own variant under a constitutional monarchy, offer two instructive ways of coordinating parliament, cabinet, and courts. Both are parliamentary systems, but the institutional logics diverge. In the UK, executive authority is drawn from and remains politically dependent on Parliament, so policy-making frequently proceeds through a fused executive–legislative channel. Judicial control over ministers is present yet circumscribed by the doctrine of parliamentary sovereignty; courts typically scrutinize executive action without purporting to override primary legislation. Japan follows a more text-driven constitutional design: the Diet legislates, the Cabinet governs, and the courts exercise review within a clearer separation of functions. As a result, lines of authority are more formally segmented than in the British model. Taken together, the two cases illuminate how shared monarchical frameworks can yield different balances of integration and restraint.

Keywords: UK parliamentary government, Japan constitutional monarchy, executive–legislative relations, judicial review, comparative politics

1. Introduction

The United Kingdom, as the origin of modern representative government, and Japan, an island nation geographically distant yet institutionally influenced by Britain, share substantial similarities in their political systems while also displaying nuanced differences. Both countries implement a parliamentary system and uphold a constitutional monarchy, yet the relationships among the parliament, the cabinet, and the judiciary vary in subtle but important ways. This paper focuses on analyzing the differences between the two political systems.

2. Divergent roles of the monarch

United Kingdom: The UK is commonly treated as a prototypical constitutional monarchy, yet its monarchical powers today are almost entirely filtered through law, convention, and usage rather than a single written text. The sovereign remains head of state, but executive authority is politically anchored in Parliament and operationalized by the Cabinet. In practice, ministerial advice controls the familiar “royal” acts—inviting a party leader to form a government, granting Royal Assent, dissolving Parliament and calling elections, and performing external representation. The classic Royal Prerogatives (e.g., war and peace, key appointments, and honors) persist in theory but are exercised by the Prime Minister and other ministers who answer to Parliament and, ultimately, the electorate,

not to the Crown [1]. The monarchy therefore functions as a neutral and ceremonial institution rather than a policymaking center.

Beyond the formal constitution, the Crown figures prominently in civic identity. The sovereign presides at the State Opening, delivers the Queen's/King's Speech, and appears at national and religious ceremonies, supplying a visible symbol of continuity [2]. Members of the royal family also undertake charitable and community work, which sustains the social profile of the institution. The emphasis on tradition and longevity gives the British monarchy cultural resonance even as day-to-day governance proceeds through elected officials.

Japan: After 1945, Japan re-cast the imperial institution within a written, postwar constitutional order influenced by the British model. The 1947 Constitution, in Article 1, defines the Emperor as "the symbol of the State and of the unity of the People," with no independent political authority; all official acts require the Cabinet's advice and approval [3]. Ceremonial duties include convening the Diet, promulgating laws and treaties, appointing certain officials, and conducting state rituals and receptions. Unlike the British sovereign, the Emperor does not make policy choices or express views on laws or governmental programs. Article 4 bars intervention in government affairs, securing a complete separation from the political executive.

The Emperor's contemporary role is thus legalistic and symbolic. Cultural and religious observances—such as the Enthronement rites and the Niiname-sai harvest observance—maintain historical meaning, while public engagements, including visits to disaster-affected regions, reinforce a unifying presence "with the Constitution and the people" and in dialogue with citizens [4]. Where the British Crown's significance is rooted in accumulated tradition, Japan's imperial status is explicitly embedded in the postwar constitutional text, emphasizing neutrality, pacifism, and the rule of law.

3. Differences in the relationship between parliament and the cabinet

United Kingdom: The organizing premise of British government is parliamentary sovereignty: legislative authority does not share the field with a higher constitutional text, and political power flows through Parliament. The two chambers divide labor. The elected House of Commons carries the decisive legislative weight; the House of Lords—now largely life peers with a residual hereditary element—scrutinizes and advises with narrower authority. In this setting, Parliament may enact, amend, or repeal any statute and subjects the executive to debate, committee inquiry, and control of finance; key government business, notably the budget, must secure parliamentary approval [5]. Tools of accountability include the confidence mechanism in the Commons and routine questioning of ministers, including the Prime Minister during PMQs, which keeps ministers publicly answerable. Control of supply remains with the Commons.

The Cabinet operates as the executive core—Prime Minister plus ministers—initiating and steering policy while remaining exposed to parliamentary criticism and votes [6]. A Prime Minister who commands a majority normally sets the Cabinet agenda and shapes the legislative timetable, which raises the odds that government bills pass. The legal framework on dissolution has shifted in recent years: the Prime Minister's ability to seek an early general election was constrained by the Fixed-term Parliaments Act 2011 and then re-enabled, in a different form, by the Dissolution and Calling of Parliament Act 2022. Formally, Parliament holds superior legislative power; practically, a government with disciplined backbench support can move business efficiently.

Working characterization: The UK thus combines robust parliamentary oversight with a powerful premiership. The Commons can displace a ministry through a no-confidence vote, yet a majority-led government often maintains sufficient support to drive policy, producing a "strong Parliament–strong Prime Minister" equilibrium rather than a simple hierarchy.

Japan: The Constitution establishes a parliamentary cabinet system in which the Diet legislates and the Cabinet governs. The Diet comprises the House of Representatives and the House of Councillors, with the former prevailing in budget approval and the choice of Prime Minister; in case of bicameral disagreement, the House of Representatives' decision controls [7]. The House of Councillors plays a reviewing and supplementary role. Legislative output carries the highest legal authority, and oversight operates through interpellations and committee work. Budget proposals must be deliberated and approved by the House of Representatives. The lower house can pass a no-confidence motion that precipitates Cabinet resignation or dissolution of the House of Representatives. Questioning of ministers occurs, but there is no weekly PMQs-style fixture, which leaves the oversight cadence less intense than in Westminster.

Cabinet and premiership: The Prime Minister—nominated by the House of Representatives and appointed by the Emperor—leads the Cabinet but navigates collective decision-making and coalition dynamics. Major policy choices are typically processed through intra-party consultation and require Cabinet unanimity, giving factions and coalition partners meaningful leverage [8]. The constitutional power to dissolve the House of Representatives exists, but its exercise is politically contingent and weighed against party and electoral calculations. Cabinet bills usually pass when the ruling parties hold a majority, yet the route to enactment runs through coalition coordination as much as formal authority.

Working characterization: In comparative terms, the Diet's checks on the Cabinet are limited in intensity, and the Prime Minister's control is moderated by Cabinet collegiality and party management. The result is closer to a "weak parliament–relatively weak prime minister" equilibrium: effective law-making depends heavily on sustaining a majority in the House of Representatives and on intra-coalition consensus.

4. Differences in the relationship between parliament, cabinet, and the judiciary

United Kingdom: Under parliamentary sovereignty, courts do not claim a freestanding power of constitutional review to strike down Acts of Parliament. Their task is to interpret and apply statutes and the common law— "in accordance with precedent and reason" so that doctrine remains responsive to social change—without purporting to displace parliamentary enactments [9]. The Human Rights Act adds a rights-screening function: judges may test legislation against the European Convention on Human Rights and issue a declaration of incompatibility where appropriate, but the statute leaves the enactment in force and invites a political remedy rather than judicial invalidation. Judicial independence is expected to be respected by the executive; Cabinet ministers may not interfere with adjudication. Prime-ministerial influence enters indirectly, through the Lord Chancellor and senior judicial appointments, yet those channels operate within safeguards designed not to compromise independence.

Institutionally, the Constitutional Reform Act 2005 created the Supreme Court and removed the Appellate Committee from the House of Lords, clarifying the separation between the judiciary and the political branches and reinforcing the norm of independence. The Judicial Appointments Commission manages selection processes to limit direct executive or legislative control. In a common-law setting, precedent structures outcomes but leaves room for principled development. Although courts cannot brand Acts "unconstitutional," they "must not shrink from deciding whether the government has overstepped the mark or whether the boundary has become so blurred as to be meaningless" [10]. The result is a form of judicial review focused on legality and reasonableness of executive action: judges may police the limits of public power but generally do not negate policy choices as such.

By contrast, Japanese courts hold greater authority. Article 76 of the Constitution of Japan stipulates that judicial power shall be exercised independently and that neither administrative

agencies nor the legislature may interfere in judicial proceedings. The Supreme Court, as the highest judicial authority, possesses the power of constitutional interpretation and may review the constitutionality of laws, regulations, and administrative orders. Japanese courts have broad powers of constitutional review, allowing them to invalidate unconstitutional laws or administrative actions and to overturn legislation or executive decisions that conflict with the Constitution. As a result of the “strengthening of judicial power, government control increasingly depends on the courts and the system of constitutional review” [11]. The Supreme Court may conduct constitutionality reviews of electoral laws, fiscal legislation, and other statutes and holds ultimate authority in constitutional interpretation. Lower courts may also exercise constitutional review in specific cases, though in practice, such overturns are relatively infrequent.

Although Japanese courts enjoy broad powers of constitutional review, they are still subject to certain constraints from the legislature and executive. The Chief Justice of the Supreme Court is nominated by the Prime Minister and officially appointed by the Cabinet, which also appoints other justices. However, the independence of the judiciary is protected by the Constitution to prevent administrative interference. Moreover, Japanese judges must undergo periodic public reviews to ensure judicial fairness and transparency, although “this review applies only to Supreme Court justices and not to lower court judges” [12]. While the executive branch cannot interfere with judicial rulings, it may still influence the judicial system indirectly through budget allocation and personnel arrangements.

In summary, UK courts are limited by the principle of parliamentary sovereignty and may conduct only limited judicial review, whereas Japanese courts hold constitutional interpretive authority and can invalidate unconstitutional legislation or executive actions. However, in practice, Japan’s judiciary is still subject to influence from the legislative and executive branches, especially in areas such as judicial appointments and budgetary control. Each country’s judicial system thus reflects its unique political and legal structure.

5. Conclusion

Read side by side, the United Kingdom and Japan reach similar constitutional aims through different routes and with different constraints. Britain’s order is the product of gradual adaptation around parliamentary sovereignty: Cabinets are drawn from the parliamentary majority, the Prime Minister leads executive governance subject to confidence, and courts police legality of executive action without purporting to displace Acts of Parliament. Japan’s post-1945 settlement, by contrast, is written and separation-of-powers oriented: the Diet legislates, the Cabinet administers, and courts possess constitutional review within that textual framework. In both systems, ruling parties shape day-to-day practice, which can narrow the space that formal checks seem to promise.

Symbolic heads of state are present in each case but embedded differently. In the UK, the monarchy has become a largely ceremonial institution associated with national continuity. In Japan, the Emperor’s role is constitutionally limited to symbolic functions, with official acts performed under Cabinet advice and approval. These arrangements set the tone for the balance between political leadership and constitutional restraint.

The comparative lesson is not that one system is “stronger” than the other, but that institutional design and political organization interact. Westminster’s fusion of powers can produce efficient coordination between Parliament and Cabinet while keeping judicial review focused on administrative legality. Japan’s clearer formal separation provides a legal pathway for constitutional control, yet coalition management, factional bargaining, and majority maintenance often determine how far that control travels in practice. Put simply, formal blueprints describe the field; party government and constitutional conventions decide much of the play.

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