

Foreign Experience In Implementing Parliamentary Oversight Of Government Activities In Foreign Countries

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Abstract: This article is devoted to an in-depth comparative analysis of oversight mechanisms in two leading democratic models of the world — the United States, which has a presidential system based on the separation of powers, and the United Kingdom, which operates under a parliamentary system characterized by the fusion of powers. Based on the results of this analysis, scientifically grounded recommendations are developed to further improve parliamentary oversight in Uzbekistan.

Keywords: Parliamentary oversight, institutional accountability, legislative control, executive responsibility, committee system, checks and balances, vote of no confidence, Prime Minister's Questions, comparative political systems.

Introduction: Parliamentary oversight is one of the foundations of democratic governance, as its control function grants the legislature the authority to hold the executive branch accountable for its actions, policy implementation, and budget allocation. This function operates through two key mechanisms — strengthening the parliament's role in maintaining the balance of power among branches of government and protecting public interests. The main objectives of parliamentary oversight are to enhance the transparency of executive activities, ensure financial accountability, and, most importantly, reinforce the rule of law.

Academic literature has reexamined the role of parliament, moving away from classical definitions. According to traditional analyses, parliament was primarily viewed as an electoral body that merely formed the government and played a secondary role in the policymaking process dominated by ministers. However, modern studies define parliament as a force that limits the political discretion of the executive branch and actively contributes to the selection and formulation of public policy.

The system of oversight in the U.S. Congress. A distinctive feature of the constitutional structure of the United States is the clear separation between the

legislative (Congress) and executive (President) branches of government. This separation allows members of Congress to remain relatively free from executive influence, making the oversight function of Congress significantly broader and more independent than that of the British Parliament. The strength of Congress grants it not only the role of approving policies but also that of shaping them directly as a policy-making body.

Although the power of congressional oversight over the executive branch is not explicitly stated in the Constitution, the Supreme Court has affirmed that this authority is inherent to the legislative process (as established in *Watkins v. United States*). Without oversight and access to information, Congress “would be operating blindly, unable to legislate wisely or effectively” (*Trump v. Mazars USA, LLP case*).

Oversight is primarily carried out at the committee level, where committees are delegated the authority to issue subpoenas to summon witnesses and demand documents. If executive bodies or officials fail to comply with a subpoena, Congress may initiate criminal proceedings for “Contempt of Congress.” The existence of this subpoena power enables Congress to conduct independent and thorough investigations into the actions of the presidential administration. This

independence serves as a key factor ensuring the depth and breadth of congressional oversight.

In the U.S. parliamentary system, there are also additional mechanisms of institutional oversight, including budgetary control, confirmation of appointments, and impeachment procedures.

Congress exercises oversight over federal agencies through the allocation of budgetary funds. In the United States, the budget proposal submitted by the President undergoes rigorous review in Congress and is often described as “dead on arrival” due to political disagreements. This situation demonstrates Congress’s absolute dominance in matters of financial control, which fundamentally differs from parliamentary systems where government budgets are almost inevitably approved.

The Senate also possesses the authority to confirm high-ranking federal officials—including judges and heads of executive agencies—based on the principle of “advice and consent.” This grants the Senate direct influence over the executive branch’s personnel policy and federal administration. Impeachment serves as the highest form of political oversight, as the Constitution empowers Congress to remove the President, Vice President, and other federal officials from office for “treason, bribery, or other high crimes and misdemeanors.” The impeachment process lies entirely within the authority of the legislative branch and represents the most severe form of political accountability.

Oversight System in the United Kingdom Parliament.

The political system of the United Kingdom is often described as “the most parliamentary of all parliamentary democracies.” In this system, the executive branch (the Government) is formed from the legislative body (the Parliament, namely the House of Commons) and operates based on its confidence. Such a fusion of powers means that the ruling party typically holds a majority in Parliament. Under these conditions, the mechanisms of oversight may lack the deep and independent investigative power found in the U.S. Congress due to party loyalty; however, they remain effective in ensuring institutional accountability. In this framework, Parliament plays more of a policy-influencing role rather than a direct policy-making one.

Select committees serve as the main instrument of oversight in the United Kingdom. Comprising members from various political parties, these committees are established to examine the performance of government departments, budget expenditures, and specific policy issues. They collect oral and written evidence from ministers, officials, and external organizations.

An important aspect of the effectiveness of parliamentary oversight in the United Kingdom is the legal obligation requiring the Government to provide an official response to the reports prepared by Select Committees. The Government cannot ignore the conclusions of these committees and must usually issue a written reply within 60 days. This mandatory response mechanism compels the Government to remain continuously accountable to Parliament, significantly strengthening institutional oversight even within a fused system of powers.

In democratic parliamentary systems, several institutional mechanisms ensure political control over government activities. The most notable among them are Prime Minister’s Questions (PMQs) and the Vote of No Confidence.

Prime Minister’s Questions (PMQs) is a form of political oversight held weekly during sessions of the lower house of Parliament, where the Prime Minister is required to directly answer questions posed by members of Parliament. Although often characterized by sharp debate and political rivalry, PMQs remains one of the most vital democratic platforms that holds the head of government to immediate and public accountability for their policies.

The Vote of No Confidence is the most powerful political instrument of parliamentary oversight. If the lower house of Parliament adopts a resolution expressing no confidence in the government, the latter must either resign in full or call for an early general election. This mechanism serves as a vital guarantee for maintaining governmental accountability before Parliament, as well as ensuring political stability and public trust.

The models of parliamentary oversight in the United States and the United Kingdom are directly shaped by their respective constitutional structures. The separation or fusion of powers determines the nature, depth, and effectiveness of oversight.

Congressional oversight in the United States is built upon institutional independence from the President. This independence allows Congress to conduct wide-ranging and in-depth investigations through inquiries and the issuance of subpoenas. Furthermore, the Senate’s authority to ratify treaties and confirm appointments grants it a level of influence over the executive branch that is virtually unknown in parliamentary systems. Consequently, U.S. oversight is characterized by its independence and depth.

In the United Kingdom, the ruling party’s majority in the House of Commons can, to some extent, limit the independence of parliamentary oversight. However, the system compensates for this through its strong

mechanisms of political accountability. In particular, the institutionalization of the government's obligation to provide written responses to Special Committee reports prevents the executive branch from disregarding the outcomes of parliamentary inquiries. Together with the Prime Minister's Questions, this mechanism makes British oversight highly effective in terms of responsiveness and institutional accountability. In conclusion, in the United States, parliamentary oversight directly participates in policymaking and remains the strongest in matters of financial control. In the United Kingdom, although the government faces the risk of severe political consequences through a vote of no confidence, the real strength of oversight lies in the institutionalized obligation to respond to the Special Committees, which ensures sustained accountability.

CONCLUSION

In recent years, the Republic of Uzbekistan has undertaken a series of reforms aimed at strengthening parliamentary oversight. In particular, the granting of additional guaranteed rights to the parliamentary opposition—such as the opportunity to hold committee chair and deputy chair positions in the Legislative Chamber, as well as the right to raise issues during the quarterly “Government Hour” sessions—represents a significant step toward the politicization and institutionalization of the oversight system. These steps indicate a move toward convergence with the British model of parliamentary practice. However, to achieve genuine effectiveness in parliamentary oversight, it is necessary to further strengthen institutional powers.

To enhance the performance of Uzbekistan's parliament, it would be advisable to introduce several mechanisms inspired by international experience. In particular, following the British model, a system should be established that requires the government to provide mandatory responses to parliamentary committee reports within a defined timeframe. Drawing from the U.S. model, it is also essential to legally reinforce the committees' authority to conduct investigations and summon officials, as well as to expand the parliament's financial oversight powers to ensure more active influence over budgetary policy.

These measures would transform the Oliy Majlis into not only a legislative body but also a key institution that ensures the accountability of the executive branch and maintains balance within the democratic governance system.

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