

Comparative Public Administration

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Basic Premises of Comparative Public Administration

Introduction

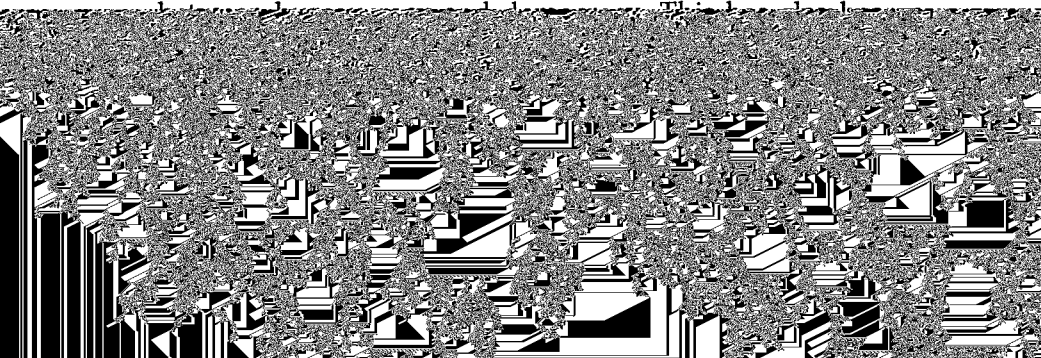
At the outset, it may be useful to identify the several types of study which have been used public administration. In the study of public administration at least three approaches may be singled out:

1. *Institutional Description Studies*—Studies of this character involve a intensive examination of the structures and functions of the administrative apparatus. Such investigation will yield detailed information about the institutions under study.
2. *Analytical Study*—Enquiring along these lines, using gross quantitative data has become more common in recent years. As a result of this, there is growing literature on administrative process and administrative behaviour.
3. *Case Studies*—This is usually applied to committees or in the study of administrative leadership. This book, it should be made explicit, will be concerned particularly with the comparative study of public administration. Comparative public administration is totally different

from the traditional academic science of public administration. It does add new and important dimensions to the study of public administration.¹

The practising administrator can get immediate aid from comparative study in many facets of his work. The most fundamental factor limiting the usefulness of comparative study is the fact that administrative experience of different institutions at cross-national, regional and local levels are based upon judgement of values and cultural bias. However, emphasis on comparative approach in public administration was paralleled by an emphasis on ecological aspects of administration. This emphasis led, in turn, to a broader universal methodological enquiry. It has produced a vast literature rich in explanatory insights. Although the field of comparative administration has been largely devoted to description of foreign system (Western countries) recent trends indicate more attention to methodological questions, especially as the field has been widened to include non-western systems. There are also a number of articles and governmental reports stressing the importance of comparative study which has grown due to various politico-administrative reasons.

Comparative public administration is undergoing different period of reflection, scholars are wondering what the configuration of the discipline really is, and which direction holds the most promise for the future. The perpose of this volume is to subject the comparative field to rigorous self-examination, with major emphasis on methodological approaches and to provide brief comparative studies of major administrative institutions and practices. Most of the comparative administrative studies focussed particularly on the relations



discipline.² The emergence of comparative administration as an integral part of the study and research in administration did provide a new élan to the totality of the discipline.

Paul H. Appleby once remarked that comparing and contrasting the administrative set-up in different contexts would help to devote commonality of public administration. Academic institutions in the USA, the UK and international agencies like the UNESCO, WHO, ILO, etc., have developed significant world programmes in public administration thus enriching the discipline professionally and academically. However, the study of comparative administration in university classes and in publications throughout the world was very much restricted to the institutional studies and legalistic theory. More extensive research has to be made to compare different dimensions of administration at different levels. But such comparative study informations and inference should not be blindly copied.³ Transplanting an alien administrative institution would be successful only if it is modified to suit the historical and social background of the country in which it is to be adopted. It should be noted that even under British colonial rule, Indian administration was not the exact blueprint copy of the British administration.⁴

Indeed, it is interesting to find out through comparative analysis as to which important factors help in the promotion of administrative effectiveness. It can also improve our knowledge of the administrative practices and other countries and to adopt these practices which can fit in with our own nation and its systems.

Besides our own interest in developing comparative research attitudes, there has been a pressure exerted by external forces to move in the direction of comparative study. One such important pressure is the globalisation of economy. Today, no nation can boost its economy in self-isolation.⁵ The interdependency for the sake of economic development made us rely on comparative study. It is only through comparative research that we will be able to allow new institutions into the changed international economic scenario. Further, economy and efficiency are the watchwords for development administration. Exchange of

administrative ideas, institution, techniques of training, rules and procedures are something much needed to work within the context of International Economic Order. While there are some common factors and elements which may transcend the political, economic and social context of administration, there are certain important factors which are shaped by international economic situations.⁶ World economy has played a crucial role in bringing nations together. Increased awareness of administration across the nations can be possible only through comparison.

Social and technological advancement is another reason for the development of interest in comparative public administration. Even some of the Third World nations have developed systematic data and informations that are essential for comparison. The urge to develop evaluative criteria or a frame of reference with which to identify and classify administrative systems and the behavioural patterns in different administrative set-up was made to search for alternative research methodology in public administration. Criteria has been identified, and it is with this mind, that an outline of a classification of administrative systems has been made. The focus on the term 'bureaucracy' as it represents a central factor in public administration, a dependent variable mostly in the interaction of societal, economic, politics, religions, racial, military and other factors peculiar to countries, regions and areas.⁷

There has been a radical change in administrative fashion after the Second World War in most of the post-colonial governments. These nations in order to keep pace with developed nations desperately in need of comparison thereby inculcated new features in their administrative set-up. It is in this way newly developed countries sought to legitimise the bureaucracy. The dysfunctionalities observed in actual working of administration made our research scholars to hunt for different 'models' in comparative study.⁸ The basic assumption in Third World is that the under development is primarily due to lack of 'new administration'. Therefore, a special type of administration 'Development Administration' has become the focal point of comparative public administration. In these

countries, public administration is conditioned by the social and economic circumstances of the society to which it relates. Thus, the coverage and the frontiers of comparative administration are much wider and encompass even Development Administration.⁹ As such, development administration and comparative administration seem to have something common in both their genesis as well as in their subsequent orientation, but it has to be realised that the focus of development administration, though deep, is in a way limited.

The quest for comparative administration study resulted in the interdisciplinary approach of the discipline. Many theories, concepts and models were borrowed from related disciplines. Riggs even went to the extent of borrowing terms and terminology from biological discipline.¹⁰ Critics point out that he over-reacted in borrowing technical terms from the most unrelated subjects. However, such a trend led to new conceptual framework and various studies of operational situations were made. Here the comparative administrative scholars sometimes speak a language strange to the ear of practising administrators. But, today the practising administrators, as well as academic specialists in public administration, have found comparative research of first importance to their work.¹¹

The new task for public administration in developing countries is to overcome the nature of ethnocentric administrative practice and culture. A more balanced study of our own system of administration can be possible only when we look at administration in other countries. Thus, a balanced treatment of public administration is necessarily studied from a comparative framework. In the world system, it is necessary to develop theories for the study of public administration that are truly universal in nature or scope.¹² It will be based on a comprehensive ecological understanding of the place of public administration in all governments, historical as well as contemporary. Systematic improvement of theoretical knowledge in the discipline should answer the changing properties and problems faced by governments. What is being emphasised here is the shift from descriptive information case studies to nomothetic studies of administration. In nomothetic studies

there will be traditional way of explanatory but supported by empirical knowledge of the institutions and dynamics of the society under study. Ethnocentric explanation of public administration phenomenon can thus be effectively checked if not altogether controlled.¹³

Though there has been great interest in comparative research in public administration, it cannot be claimed as a panacea of administrative problems. There are practical limitations to comparative methodology. As a creative process, it can be used only in certain situations. Firstly, the units selected for comparison must have the same conceptual framework. Secondly, the levels of comparison must be the same. Thirdly, there should be an agreed definition on the things to be compared, and fourthly, the definition of the focus of inquiry makes analysis more meaningful and useful, leading to generalisation. This method can be applied at two levels.¹⁴

1. Micro level, and
2. Macro level,

Apart from these levels of analysis, the researcher must also select the choice level. The choice level depends on:

1. The objective of the comparison;
2. Resources of the researcher;
3. The nature of study, and
4. The choice of identifying comparative variables.
(Comparative method is a means of establishing empirical relationship between variables.)
5. Selecting the general framework.

Comparative study of public administration necessarily associates itself with the other mainstream of social sciences whereby conventional systematic comparison can be made. The mainstream includes economics, political science, sociology and psychology. Interestingly, it is because of comparative approach of public administration, that the American oriented study of the discipline is checked. No longer will public administration theories be based on the exceptional American experience.¹⁵

Initially, the Comparative Administrative Group (CAG) has focussed development administration as the Third World problem. But, today it also includes understanding of a country's public administration in its global context. In 1987, Ferrel Heady demonstrated how comparative analysis imported foreign models and practices which have contributed in the shaping of the American political and administrative institution. It was estimated between 1980 and 1990 that nearly 253 comparative public administration articles appeared in 20 different journals across the world.¹⁶ Comparative methods have also been adopted in many articles published in some of the Indian journals. The Indian Journal of Public Administration has published a volume on comparative public administration in 1985.

The area for comparative research is wide enough to accommodate the problems of developed and underdeveloped countries. The major areas of research are bureaucracy, public policies, behaviour of employees, motivation, finance, developmental aspects of administration, administrative set-up, etc. The validity of comparative study in these broad fields of public administration depends much on empirical support. In this context, a note on Indian statistical data is needed.¹⁷ Despite the massive size of public bureaucracy, widespread illiteracy and rural nature of population, Indian demographic and socio-administrative statistics have been found remarkable. Data required for comparative studies which includes India are obtained from

1. Decennial census enumerations,
2. National sample survey,
3. The sample registration system,
4. Central and state government reports,
5. Reports of constitutional and parliamentary bodies,
6. Statistical gathering by individual government offices,
7. Sample survey by private research organisations such as operation research group (Kolkata),
8. World Bank reports,
9. UN agencies reports, and
10. Individual fieldwork.

The availability of rich data from different countries and the relevance of comparative study will certainly pay dividends in public administrative knowledge. Thus, the comparative perspective has become so inevitable and prominent that understanding of one's own national system of administration will be enhanced by placing it in a cross-cultural setting.¹⁸

Meaning of Comparative Public Administration

Comparative public administration is a sub-field of broad public administration discipline. It is true that such an established sub-field exists in political science entitled, "Comparative politics" or "Comparative governments." Although the subject is not construed as consisting of theories, but there is ample evidence of current interest in Comparative Public Administration in the form of bibliographies, conferences, new courses and a wide range of scholarly articles, and books. Even the American Political Science Review recognised this subject by inaugurating, as on March 1963, a bibliographical section entitled *Comparative Public Administration*. New interest was shown by the American Society of Public Administration, when the comparative public administration group was established.¹⁹

It is evident and self-explanatory that the future of the discipline of public administration is hinged with the ever-expanding directions of comparative studies. Cross-cultural studies would eventually place the discipline on a firm footing and supply sufficient material for providing satisfactory explanation to administrative problems, establishing it on the solid bed-rock of scientism. In comparative public administration, cross-cultural analysis is essential.²⁰ Robert A. Dahl says, "The comparative public administration specialist is first and foremost a scholar who is in pursuit of greater knowledge and understanding." Further, R.A. Dahl once remarked that in order to establish science of public administration, it has necessarily to be comparative.²¹ Similarly, there are other social scientists such as Edwin Stene, Herbert Simon and Dwight Waldo who believed that in order to make public administration a scientific discipline, it has to make its explanations comparatively rational. Rationality and scientific

investigations make any subject capable of providing satisfactory solutions to the problems of public administration in different cultures.²²

In the past World War period, the scholars who studied the administrative systems of different countries, "concentrated on central administrative machinery, decentralisation pattern, control over the executive branch of government, civil, service structures, public finances, financial administration and the functions of administrative officers."²³ Arora is of the view that traditional public administration literature is primarily descriptive rather than analytical, explanatory and problem-oriented. Essentially, it is "non-comparative" in character for despite the study of governments of several countries, cross-temporal analysis and explanations were rare. It also lacked techniques and concepts to undertake such studies, especially of the non-western areas.²⁴ It is accepted that control, communication, planning, organisation, co-ordination, and even efficiency and economy have major relevance to the study of comparative public administration.

Or the first time, in 1952, a sincere effort was made in the USA when a conference was organised on comparative administration in Princeton University. It was during this conference that a sub-committee under the Committee on Public Administration, entitled Comparative Public Administration was established, to develop a criteria of relevance and a design for field studies in foreign countries."²⁵ Even the American Political Science Review had recognised the comparative public administration movement by inaugurating in March 1963 a bibliography section entitled Comparative Public Administration.²⁶

In the comparative public administration movement, the most commendable work has been done by the Comparative Administration Group (with Professor Fred W. Riggs as its Chairman) of the American Society for Public Administration. The CAG has already brought out a number of research books. The development of the comparative public administration movement has to be viewed in the light of severe criticism by three stalwarts of political science who unintentionally have

done more damage to the discipline of public administration than anybody else. It was the case of an infant discipline (public administration) being subjected to surgical trimming by competent medical practitioners. In 1947, Robert A. Dahl bemoaned the absence of a universal public administration. The other critics of public administration were Simon, Waldo and Stene.²⁷ The student of public administration has to come up to the expectations and look to the deficient areas of public administration, as pointed out by the senior teachers in order to make the discipline convincingly relevant, scientific and useful to humanity at large.²⁸

In order to enrich the discipline of comparative public administration, and make it more scientific, it has to be critical, analytical, cross-cultural and not merely descriptive. The younger administrative thinkers need to realise the desirability of comparative administrative studies to be critical, analytical and based upon sound judgements supported by "true" data collected from different countries of the world. The most significant development in public administration currently engaging the attention and energies of a large number of students both young and mature is the focussing of attention on comparative public administration and the related problems of development administration.²⁹

Why the young student's "attention" is attracted towards comparative public administration? This is because of their "personal interest or experience," "world-wide developments" in administration by developing countries and also because one is addressed to "wide spectrum of interests" from concrete policy questions to the abstractions of pure social sciences.³⁰

In the comparative public administration movement the essentials to be precisely defined are the following:

1. Concepts to be used in understanding of administrative phenomena.
2. Comparable variables to be identified by the scholars to be used to differential one category of administrative system from another, and
3. New reliable techniques for investigation and inquiry.

For the most part it is the younger students in public administration who are active in the comparative movement and certainly, it is they who are chiefly interested in the theoretical scientific question. For the most part, and in a general sense, these younger students are behaviourally-oriented with the central problems of social sciences.³¹ They are not essentially attracted by the formulations and interests of Simon, but find their inspiration in models, and techniques in other parts of the contemporary social sciences, most notably in the companion movement in political science, comparative politics, and in sociology.³²

It is an established fact that the cross-cultural dimension of public administration has a promise and a future in the development of a science of public administration. Comparative administration is the only hope for the growth and development of public administration in the near future. Exposure to foreign, often non-western, governmental systems, and cultures has stimulated a sense of "comparativeness" in general and in particular raised questions either about the appropriateness or the sheer possibility of transferring familiar administrative devices or applying what had been presumed to be good or scientific principles of administration.³³

It is now clear that those students of comparative politics and comparative public administration who were engaged in the study of political institutional processes and socio-economic environments were actually studying public administration from the point of view of comparison. This comparativeness from the cultural point of view or ecological points of view forms part of this sub-discipline.³⁴ While delivering a most fascinating series of lectures at the Indian Institute of Public Administration in 1969, Professor Fred W. Riggs had chosen the subject, "The ecology of public administration." He had selected the United States, Thailand and the Philippines—three countries—for the purposes of comparing the ecological objects of these three different administrative systems. What appeared to be a "concern" as well as difficulty of professor in 1980, was expressed by him in these words.

"How can one associate different countries? Some of my colleagues would surely say that they are not 'comparable,' each is distinctive and unique to such an extent that it can only be studied or approached as something apart, yet think that we can find common elements in these three countries or at least common variables in terms of which they can be compared".

Comparative public administration deals with administrative organisations or systems pertaining to different cultures and settings whose similar or dissimilar features or characteristics are studied and compared in order to find out "causes" or "reasons" for efficient or effective performance or behaviour of administrators, civil servants or bureaucrats.³⁶ In the third world countries, single variable dominated studies as possible. This single variable is "development." Development itself is a sub-approach of the ecological school. Development may be economic or social but it forms part of the ecological approach. The ecological perspective is, thus, the main concern of comparative administration scholars.³⁷ The economic, social and political aspects explain the way administrative systems operate. The scholars wrote right about comparative public administration agrees on the broad context or concern of comparative public administration.

In the Princeton University, the public administration clearing house hosted a conference on comparative administration in the year 1952. The conclusions of the conference are summarised below:

1. Distinction should be drawn between policy values in government programmes and academic values in understanding administration,³⁸
2. Focussed research would be more rewarding than re-classifying existing data, and
3. Criteria of relevance are indispensable.

Later, a sub-committee of the Committee on Public Administration of the American Political Science Association was formed to develop a frame of reference of the "criteria of relevance" which would guide researches in public

administration in future.³⁹ Wallace Sayre and Herbert Kaufmann had prepared a summary frame of reference for Princeton University. This frame of reference included questions relating to the following.

1. Organisation of the administrative system;
2. Organisation control and organisation ability to secure compliance; and
3. Criteria of adequate performance of the administrative system as a guide to practitioners.

According to Fred W. Riggs, there are three trends prevalent in comparative study of public administration during the last 55 years. The first is a movement from the normative to the empirical approach. This reflects the emphasis of the "how to" writings recommending changes in administrative structure and functioning and laying an emphasis on description and analysis of actual administrative situations.⁴⁰ The empirical writings are not yet truly comparative. The empirical writings express both the "ideographic" and "nomothetic" approaches and it is the movement from the first to the second of these which constitutes another, *i.e.*, "non-ecological" to "ecological" approaches. All these shifts or trends are seen in F.W. Riggs theory.⁴¹

The nomothetic approach is genetic and law-seeking, although it is not necessarily concerned with any inviolable-patterns. The third trend, also less distinct than the first, is from the non-ecological approach which describes administrative institutions as separate entities existing apart from their cultural settings, whereas the ecological approach is concerned with the full patterning of relationship, and inter-relations in the total social system.⁴² According to Riggs, the non-administrative factors need to be related to the administrative, and in his view the only studies which are truly comparative are those which are empirical, nomothetic and ecological. Keith Henderson admits that "Fred W. Riggs stands at the forefront of the comparative public administration movement."⁴³

All Riggs's works are ecologically-oriented and his theory building is mostly confined to the ecological perspective. We can say that the Riggsian Theory of Comparative Public

Administration is mostly the “ecology of administration approach.”

Ferrel Heady has given the following four approaches to the study of Comparative Public Administration:

1. Modified traditional approach,
2. Equilibrium or input-out-put approach,
3. Bureaucratic orientation approach, and
4. Ecological approach.

Keith Henderson accepts only three approaches in Comparative Public Administration:

1. The bureaucratic system,
2. The input-out-put system, and
3. The component system.

Bureaucratic system approach is an attempt to study bureaucratic organisations of different countries. It is a well-known fact that Prof. W. A. Robson had earlier contributed to the study of civil services of France and Great Britain Professor Herman Finer had also attempted a comparative analysis of bureaucratic organisations of several (seven) European bureaucratic organisations and their behaviour.⁴⁴ Murroe Burger in his book, *Bureaucracy and Society in Modern Egypt*, tried to test Weber’s ideal-type model of bureaucracy. Burger later tried to explore the structural functional theory of bureaucracy as applied to the developing countries.⁴⁵

Robert K. Merton and Professor Robert V. Presthus had tried to test the value theory of bureaucratic behaviour in western and non-western countries. Robert K. Merton developed a middle-range theory for the study of bureaucratic organisations which explains a manageable set of relations rather than the broad-gauge special theories at one extreme, and non-comparable individual cases on the other.⁴⁶ Similarly, Alfred Diamant’s “The Bureaucratic Model: Max Weber Rejected, Re-discovered, Reformed” in Ferrel Heady and Cybill Stoke’s book is an effort to explore the value of Weberian theory in research of modern democratic organisations. It will be of much use to suggest to the students of bureaucratic

organisation as an approach to comparative public administration they need to read Joseph La Palombara. They should also read Leonard Binder to have a clear picture of bureaucracy in different cultural settings.⁴⁷ Leonard Binder revealed three major types of political processes of development which must necessarily proceed before the development of bureaucratic organisations as noted by La Palombara. Some students of Professor Talcott Parsons, namely Philip Selznick and Reinhart Bendix had pursued the organisational theory of "Structure-Functionalism" while studying bureaucracies. Amitai Etzioni also studied organisations from a similar perspective, followed by the study of bureaucratic organisations by Blau and Scott who had shown considerable interest in the organisation theory of bureaucracy.⁴⁸

The input-output approach is an outcome of the systems approach. Through the conversion process, the inputs are transformed into outputs and a balance sheet is prepared with the expectation that outputs will always amount to more than the inputs. It is also sometimes called the "input-conversion output system approach." it is described as less organic than the famous structural functional bureaucratic model.⁴⁹ In this input-output system approach there is no reference to the relationship between the parts and the whole, *i.e.*, the component parts are not "explained" to be inter-related functionally, although they are, *i.e.*, the parts are always organically inter-related as elements of the whole. In the case of the input-output approach, there is more emphasis on the input-output equation, upon boundary exchanges between system and environment.⁵⁰ Fred W. Riggs *industria* and *agraria* also postulates an input-output scheme although he does not emphatically state this in his model.

The "Input Conversion Output" approach is more an outcome of David Easton's model. In Comparative Public Administration, David Easton has contributed more than any other scholar. In comparative politics, the Eastonian model, has also been improved by Almond and Coleman of politics of developing areas fame. Easton mostly borrowed concepts and basic materials from the master sociologist—Talcott Parsons.⁵¹

Almond had identified four basic inputs of a political system which are transformed through the conversion process into three outputs. Dorsey says that in comparative public administration research focus may be upon transigent factors *e.g.*, stresses and strains, affecting the conversion processes. Ira Sharkansky had used the input-conversion output approach to the study of public administration.⁵² The framework of her book regards environment as the inputs, and laws, policies, orders as the outputs, the concession processes as the feedback.

Professor Henderson's The Component Approach calls a "catch-all" for historical and other materials not classifiable as a bureaucratic system or input system. James Fesler had applied Component Approach in Comparative Field Administration.⁵³ There is an emphasis on power, and communication linkages between the centre and fields which are suggestive of integration into a model. This approach takes into consideration the main points of Dorsey and Almond.⁵⁴ Similarly, Fritz Morstein Marx had studied the external varieties of control and responsibility. In studying administrative systems of different countries, a comparative scheme can be employed which includes the study of structure, purpose, process and environment the comparative administrative systems approach.⁵⁵

Professor Gerald Caiden explains the comparative scheme as given below:

Although each administrative system is unique, administrative system can be compared according to their (a) processes, (b) purposes, (c) structures and environmental interaction, trans-cultural administrative processes, that is, how different cultures get things done—can be examined at many different levels, from individuals to international arrangements, and according to race, sex and other ascriptive criteria.⁵⁶

It is widely believed that Comparative Administrative Systems are studied on the model of comparative governments. The comparative public administration approach had more or less closely followed the comparative political analysis. Comparative analysis had not to be descriptive of formal institutions. To be formally descriptive of organisations, rules

and regulations are not comparative but unreal, narrow, egocentric, subjective and static.⁵⁷ Comparative public administration has recently progressed fast, but it has not yet provided the "thoroughness or breadth of coverage" that is available from international comparisons.

A cross-national comparison informs us about the global range of differences in some administrative forms and processes. A system framework may appear to a scholar-researcher to be more useful in cross-national comparisons. The systems orderly of environment inputs, outputs, and feedback can highlight the features of administrative systems that are related to each other. From the standpoint of evolving a scientific and useful body of administrative knowledge, value is derived from careful comparative study.⁵⁸

Despite exhortations from scholars, students of public administration have not been exclusively and extensively involved in studying comparatively numerous administrative systems. As a result of this lack of research activity, comparative public administration has not evolved an adequate body of knowledge which could form part of a "theory of public administration" so direly needed. Scholars from different cultures should devote time earnestly in comparative studies of administrative systems. Despite all scholarly efforts to strengthen development administration abroad and also emphasising the ecological perspective, it is yet not clear what are the objects to be compared under comparative public administration⁵⁹. But it is clear that "comparisons" could be made by assessing structure, processes, values, regulations, codes, patterns of behaviour and votes of all those that consist in an administrative system in the cross-cultural context. It is now a highly accepted proposition that there should be a multidimensional approach to the study of non-western public administration systems.

The American Political Science Association had appointed four-member team consisting of Sayre, Kaufmann, Sharp (as Chairman) and Riggs. Sayre-Kaufmann draft was re-worked into a conceptual scheme to be applied to three similar cultures on a general ecological approach advocated by Riggs.⁶⁰ As funds could not be made available to pursue the research design

this hampered investigation in the comparative public administration movement. Professor Caiden believes that "ideographic studies have tried to meet Dahl's 1947 criticism by hypothesising at narrow- and middle-range theory level, although much ideography has followed traditional lines. These studies have borrowed extensively from other social sciences and theory, have incorporated, both consciously, and unconsciously the theoretical models and conceptions of comparative politics.⁶¹

Let us, emphatically conclude that the Comparative Public Administration movement crystallised the point of identifying two major concerns:

1. Search for a conceptual framework (nomethetic approach), and
2. Correlation between variables.

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 - (b) Prof. Miller Hill House, Cornell University.
 - (c) Prof. Herbert Kaufmann, Yale University.
 - (d) Prof. Albert Lepawsky, University of Alabama.
 - (e) Prof. Roscoe Martin, Syracuse University.
 - (f) Mr. Arnold Milles, U.N. Bureau of Budget.
 - (g) Robert Presthus, Michigan State College.
 - (h) Prof. F.W. Riggs, Public Administration, Clearing House.
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Evolution of Comparative Public Administration

The origin and development of public administration as a distinctive subject can be traced from 1887 onwards. Prior to 1887, almost no written materials existed on the management of public administration. In India, there are evidences to suggest that there existed a good literature on the aspects of administration even before 1887. Kautilya's *Arthashastra* described the tactics of foreign policy and defence. Kautilya called for science of public administration but most of his conceptions about the science of administration were limited to his times. As a result, it failed to attain a universal recognition. In Europe political philosophers like Plato (348 or 347 BC) and Aristotle (384-322 BC) described the style of administration in the Greek city-states. Machiavelli (1513) in his celebrated book *The Prince* mentioned about the character and conduct that are essential for public servants in the Chapters 22 and 23.¹ During mercantilistic era, Thomas Hobbes (1588-1679) viewed that administration could be ignored in the context of the newly emerging polity. It is only with the advent of Montesquieu (1748) that distinctions between administration and politics were clearly made. The author in his book *The Spirit of Laws* mentioned that administrative functions can be guided by regulations of

the state and not necessarily by laws. Jean Jacques Rousseau (1712-1778) predicted the expansion of administration upon the polity as states expand in its activities.²

In India, early political writings considered the entire societal divisions for administering them collectively. Hindu political writers were guided by certain common considerations. *Dharma-sastra* and *Vedas* infused the 'division of labour' in society, which later became rigid social stratification. They have also distinguished between authority and power. The 'amatyas' were men of independent social status and were executive officers in charge of day-to-day administration. Hindu philosophers advocated the importance of efficient administration, constant checks of subordinate officials, programmes of welfare provision, and so on. The establishment of East India Company in 1600 and the subsequent British Colonial administration in India resulted in transporting the western administrative practices to India. It has resulted in the deathknell of ancient Indian indigenous administrative practices. It was further marred when the Americans made more systematic and scientific analysis of administration³.

Wilson Era

The present scientific status of public administration can be traced from the early writings of Woodrow Wilson, the former American President. Wilson's perspectives of public administration have strongly influenced the rest of the world during the eighteenth century. Even Wilson never failed to recognise the importance given by the French and the Germans in proper understanding of the machinery of the government. Certainly, Wilson was the first administrative thinkers who argued that politics and administrative were different functions. In his speech before the Historical and Political Science Association at Cornell University on November 3, 1866, he issued a call to political scientists to study more effective techniques for administration.⁴ His first speech on the techniques of administration was published as an article in *Political Science Quarterly* during July 1887. May be it was the first known academic publication on the 'art of administration' in a more

technical sense. In this article he traced the evolution of government through three phases. They are absolute rule, constitutional government and the administration of constitutional government.

Comparative Perspectives

Interestingly, it was again Woodrow Wilson who can be credited with introducing comparative study of public administration. He was the first comparativist, who compared American government system to the Cabinet System in the United Kingdom to demonstrate that the USA lacked unified authority in several fields of administration. His comparative study was basically concerned with the issues of maintenance of democratic polity.

The Comparative Paradigm set by Wilson has the following features:

1. The science of administration for the United States should be focused from the democratic point of view.
2. A good government is synonymous with the practices of public administration.
3. Civic issues were equally significant to those who conduct the everyday affairs of the government.
4. Administration can be evaluated in its best only by removing the political aspects of administration.

The last point made by Wilson needs self-examination. Undoubtedly, politics runs all the way through administration and the study of comparative administrative in a non-political perspective is totally unrealistic. In the same tone Marshall E. Dimock criticised that Wilson was unrealistic in saying that the field of administration is a field of business and there is no scope for politics. We can presume that during Wilson's time the subject was only in a rudimentary form which he interpreted in a different way. We must understand that politics and administration being sequential parts of the same process are actually inseparable⁵ In fact, the major concern for Wilson was to create a professionally trained, hierarchical bureaucracy that could be responsible for a unified political system. Such division

of politics from administration is neither good for public administration nor it can serve the best interests of democratic polity. However, by early 1880s Wilson slightly changed his views on politics—administration dichotomy and to a certain extent accepted that there is no scope for administration without the influence of politics in democratic system.⁶

Initially, comparative study on a small scale began in the nineteenth century. It started with various reform movements in the United States. The Municipal Reform Movement Civil Service reforms and other government changes of the latter part of the nineteenth century made several comparisons with the United States. Such comparative studies were aimed to increase the efficiency of public administration in the USA. Some important landmarks in these directions were made by the reports of the US Senate and various commission reports. They are follows:

1. US Senate Report—the Select Committee of the US—March 8, 1888.
2. Additional Report of the Select Committee—March 28, 1889.
3. The Cockery–Cockrell Commission—September 30, 1893.
4. Committee on Department Methods—1905-1906.
5. Commission on Economy and Efficiency—1912.
6. Report of the US Bureau of Efficiency for the period from March 25, 1913 to October 1916.
7. Joint Committee on Reorganisation—1920.
8. Commission on the Organisation of the Executive Branch Government—A Report of the Congress—1949.

The reports we mainly concerned only with a limited extent of comparison that too within the United States federal government agencies. Its just reflected the Americanised reforms of public administration. There was a complete neglect of cross-national studies to improve the American standard of public administration. Perhaps, the Americans thought that there would not be any system available outside the United States to be compared and introduced in the USA. This has been one of the greater weaknesses of American administration at that time.⁷

Post-War Development

Almost all literature in political science that appeared after the Second World War justified the role of government as an agent of socio-economic transformation. Governmental intervention was more sought by the newly emergent nations of the Third World. The parameters of governmental activities even then were dictated by the political elites in these countries. They adopted a governmental structure that was influenced by the historical accidents. However, the leaders of the Third World who received western education never failed to accord an important role for public administration.⁸

For instance, in India even before independence the Congress Working Committee favoured for a planned economic development. This was an idea borrowed from the Soviet experience of planned economic development. The famous Mahalanabis Model was influenced by the Soviet Economist Fieldman. This model particularly ignored the effects of exports and imports. A mixed economy type in India gave the public administrators to play significant role. In the same way the independent Chile followed a socialistic path based upon Marxist – Leninist principles. Through socialism, the Cuban government under a charismatic leader, Fidel Castro exercised a far more governmental control over the economy and thus provided a wider scope for public administration. Syria aimed for a social transformation of the society on the democratic basis with participation of popular masses. This has been the same case with other Middle East countries.⁹ Military bureaucracy in Iran and Iraq effectively checked the growth of modern bureaucracies in these two countries. Most of the African countries because of the political instability factors opted for limited role for the national and regional bureaucracies.

The growth of governmental intervention, the Great Economic Depression, and post-war reconstruction process have caused the dramatic growth of public administration. This trend is also reflected in the academic discipline of public administration. In the beginning the 'public' part of the subject received greater emphasis and importance. Principles of public

administration centred around increasing efficiency and productivity of large scale industries. American industrial experiences were applied throughout the world with some modified version to cope with local needs and conditions. The scope of public administration was limited by Luther Gulick by the term 'DOSDCORB'. Mechanical engineers study became the study of managerial problems. Taylorism or Scientific Management Movement developed the 'machine model' for the sake of increasing efficiency and productivity.¹⁰

Era of Scienticism

Scientific approach to management was considered to be the central focus of invention between 1910 and 1930. Taylor and the advocates of scientific management movement showed little interest in the development of public bureaucracies for modern governments. They were more concerned with job design. There was a little bit of comparison during era of scientific management. The early methods of comparison was strictly confined to individual jobs alone. Scientific management qualitatively measured people within positions, but comparisons were verbal.¹¹

Benge in 1926 developed a new approach of comparison which is known as 'factor comparison'. The technique consists of a set of factors which are defined in such generic ways that comparisons for rankings can be made across the class lines used in point factor systems. The technique was subjected to revisions on many occasions and it was used for job analysis also. Such comparative studies were more general in nature and was applied only in selected large-scale industrial organisations in the United States. Studies conducted in successful industrial complexes in the USA.¹²

Later became the most celebrated universal principles of public administration. Such culturally specific principles were criticised by Herbert Simon as 'proverbs of administration' and thus he paved the way for new orientation in the discipline. He re-evaluated the so-called principles and shifted the emphasis from mere principles to rational decision-making as the basis of public administration enquiry. A common paradigm for

comparative analysis was made at least at the policy-making level and also paved way for more rational theory making in public administration¹³.

These developments have closely associated people in the study and practice of public administration and has shown little interest in the role of citizens in a democratic set-up. Democratic theory and ethics played a minor role in public administration. By the 1960s and 1970s public administration was facing an identity crisis. Civism was absent from public administration. The rebirth and recovery of civism in public administration provided a firm and solid anchor to the practice and helped to regain its original footing. Thus, evolution of theoretical knowledge in public administration can be broadly classified as follows:

- (a) Public administration based on some leading ideas commonly acknowledged as principles of administration. The most well known theorists and practitioners were Frederic W. Taylor, Lyndall F. Urwick, Luther Gullick, James Mooney, Alan Reilly, and Henry Fayol. What united these theorists was their belief that administration was a science and that uniform applicable laws and principles could be identified and would result in the best.
- (b) Social psychological model appeared during the Second World War. While classical public administration is basically prescriptive, this was essentially descriptive. Elton Mayo, Fritz Roethlisberger and William Dickson were the forerunners. This is also known as Humanist School which later also included Max Weber, Robert Golembiewski, Chris Argyris, Rensis Likert, Warren Bennis, Douglas MacGregor, and Robert Prehstus.
- (c) Behaviourism in the study of public administration was well started with Herbert Simon. Decision became the unit of analysis for him and he further added that administrative man arrives at rational decision for which he should have access to a carefully designed and computerised management information system.¹⁴

- (d) In the seventies and eighties the two new approaches are comparative public administration and developmental administration. These approaches viewed administration as a sub-system of political system. Administration as a sub-system in different countries has its own cultural values, norms, folkways and socialisation process. There is an effort for interdisciplinary studies and techniques followed to arrive at concepts, formulas and theories that are truly universal, bridging and embracing all cultures. Riggs, Weidner, Diament and Eisentadt played a major role in this regard. The model is known as ecological and developmental model and can be used in cross-cultural analysis. The study primarily aimed to understand the interaction of bureaucracy with other aspects of socio-political system.¹⁵

Before the 1970s the textbooks in public administration were generally organised on a 'country-by-country' basis. This approach is known as the configurative approach. In this approach, each administrative system was taught separately. No attempt was made to link various aspects of one administrative system to the other. It is only after the 1970s, that the comparative method became popular and fashionable. Certainly the influence of comparative approach followed in political science by David Easton, Almond and Powell had an impact on public administration discipline also.¹⁶

When comparative methods were adopted by the scholars of public administration there were some criticisms. They found that most of the comparative work in public administration was parochial. The study of comparative administration meant study of western administrative system. By late 1980s the pressure was that non-western administrative system be given a place of pride in teaching and research of comparative administration.¹⁷ Secondly, the criticism was against configurative approach. Because of this, attempts were made to do some theory building in the field of comparative administration. Thirdly, the criticism was that the study of comparative administration was too

formalistic. The approach had been historical, legal, institutional and formal. Behavioural aspects of comparison was altogether neglected. Thus, it became necessary to comment upon the methodology adopted to discover the gaps that still remains to be fulfilled in the field of comparative research.¹⁸

The purpose of this book is not to create young comparative research scholars out of college sophomores. But, rather to present comparative administrative study as an important aspect of public administration, an usually neglected field which we should make available to young scholars. The gap which needs to be filled in public administration is the neglect of comparative element. In our increasingly bureaucratic society, more and more writings should appear on the subject of comparative public administration. This book treats public administration not as a 'pure' subject. Definitely not as some of the pure social sciences like economics or psychology. At the most, public administration can be considered as a hybrid or applied science, importing concepts and insights from other social sciences and the administrative practices of different nations. This can be possible only by an attempt of a comparative study of administration. Comparative study of public administration necessitates to borrow its vocabularies or concepts from political science, law, economics and industrial management. This book on comparative public administration is approached from a more interdisciplinary view point.¹⁹

As noted earlier, comparative account of public administration since 1980s centres around public bureaucracies. More specifically it has been directed to questions like: What power do bureaucrats exert over the machinery of government? What is influence of bureaucrats on political decision and the quality of public services in different national societies? Earlier, comparative work on public administration draws on the work of Max Weber to present a comparative analysis of bureaucracy. In modern society, bureaucrats acquire political significance because they are indispensable. Yet, their position in democratic political systems remains problematical since the role assigned to them by democratic theory is subordinate and instrumental, they are expected to be the handmaidens of the people and their

elected political representatives.²⁰ To a remarkable extent, the USA has no permanent and professional bureaucracy at the level of policy-making where all issues become political, but in contrast to the USA, Civil Bureaucracy in the UK and to some extent in India have a powerful professional and permanent bureaucracy at the policy-making level.

In France and the United Germany, there are different methods of fusing administration and politics at the top. In Japan, bureaucracy enjoys the confidence of politicians and keeps party political intervention in its career system at bay. In Italy, the bureaucracy has highly vested interests and its role is very unimportant. Generally, it can be said that bureaucracy is more powerful in non-democratic governments and less powerful in democratic countries.²¹

Why Comparative Method?

A well known political scientist James Coleman remarked that "You cannot be scientific if you are not comparing." Administrative systems of countries are not unique, they are comparable with other countries. When we say, for example, that the administration of country X has become a rubber stamp for the political executive, this is not a very meaningful statement until we note, that it is also the tendency in countries Y and Z. We often hear statements such as—Rao's administration was very corrupt. Compared to what? To Mrs. Indira Gandhi's administration (1980-84) or to V.P. Singh's administration. We hear statements like this one. The trouble with West Bengal administration is that the government servant's union is very strong. But what percentage of the West Bengal Government Servants Unions are unionised? How does this compare to Tamil Nadu and Haryana?²²

Our thinking on administrative process will be greatly clarified if we put ourselves into a comparative perspective by frequently asking, "Compared to what?" A little bit of theory building has also taken place. It further suggests remedies for the administrative ills of various foreign and our own administrative system."

Robert A. Dahl contended that if public administration has any conceptual validity, it must address three major obstacles:

1. The inherent normative implication of public administration,
2. What a science of public administration must be based upon a study of human behaviour, and
3. That "as long as the study of public administration is not comparative, claims for a science of public administration sound rather hollow."

Dahl's Last Point Warrants Attention Here

There are some limitations for comparative methods. Firstly, we must remember that comparative method is not a universal method. You cannot compare everything. We can compare only what is comparable. For instance, we can compare Indian administration with British administration, but we cannot compare Indian administration with Chinese administration because a comparison between the two would be misleading because of the system differences. Comparative analysis even among several advanced countries is problematic since data tends to be available only in the most general or the most particular sense.²³

The Indian scholars of public administration have paid little or scant regard for comparative methods of study in public administration research. What we failed to understand is that generalisations relating to administrative structures and behaviour emerging out of comparative studies in different nations and culture help in formulating theoretical constructs which can provide a scientific basis to the study of public administration. Comparing public services across the national boundaries is not meant to imply that what is being studied is the same in every country. Rather, it is to explore whether and under what circumstance public services for welfare are similar or different.²⁴ Comparison starts with a set of common questions and research which tests whether or not the answers are the same. Through a study of comparative public administration, administrators' policy-makers and academicians

can examine causes for the success or failure of particular administrative structures and patterns in different environmental settings.

Rationale of Comparison

The message is clear and vital. The study of administration must proceed with attention to how administrative behaviour and relationship vary under different conditions. Public administration like political science is fundamentally comparative in nature. Our comparison may focus on different administrative organisations or within different regions. In addition, we may wish to compare the same administrative system at different points in time, in effect, to compare an administrative system "within itself" over time. But whatever the form of framework, comparison is essential to our understanding of public administration.²⁵

It has been claimed that one important dimension of science is compared. In the process of theory building and in the process of interchange of ideas among human beings, comparison is quite imminent. Through comparison a scientific development of knowledge is quite essential or possible. According to the political scientist W.A. Welsh "comparison is the basis of concept formation." People assign some characters (term or concept) to things that seem similar to one another. For instance, we call organisations that are under the total control of the government as departmental organisations that offer service to the public at large. We also separate 'public corporations' from departmental organisations that also lend service to the people, but which do not come under the total control of the government, obviously, in order to differentiate these two different types of organisation, we have comparative domain of control exercised by the government. Here 'control by the government' is the common framework of analysis of these two organisations or what we refer as 'concepts' that binds upon these organisations.²⁶

The second rationale for comparison is for the sake of classification. Once we have decided that we are going to talk about organisations, we need to determine what characterises

an organisation. We want to use basis for classifying them. Traditionally, we have classified organisations primarily into three types—departments, public corporations and independent regulatory commissions. How we decide to classify our concepts depends largely on our theoretical interests, that is, on what we are hoping, to explain. When we want to differentiate the public organisations in terms of their sphere of autonomy from the government control, it means that we establish a reasonable paradigm for comparison. First, we go on to classify them into several categories. Then we have to compare them to identify similarities and differences among them.²⁷

After establishing the concepts and categories of classification, we can move on to put them in a particular theoretical framework that we can use for our research purpose. A theoretical framework is really just an explicitly stated set of explanations and hypotheses about how we think certain selected aspects of reality operate. These expectations and hypotheses must be verified, *i.e.*, they should be compared with reality. They must be repeated several times to test accuracy. Therefore, comparison is crucial when we test accuracy in different situations or conditions. It must be remembered that we are comparing certain things only similar framework.²⁸

Thirdly, the process of deriving general statements of relationship between specific administrative phenomena with various settings is known as induction. Comparison is an important part of induction. Sometimes research scholars by a logical process move from a more general statement to a more specific one. Obviously, comparison is crucial to deduction since the validity of using a given deduction to test a general proposition depends substantially on the degree of comparability between concepts of the general statement and the concepts of specific statement. The above discussed matter is the process of scientific inquiries. It is undeniable that the scholars of public administration have relatively little knowledge of public administration in other countries. This is unfortunate because the increasing amount or interaction across national boundaries demands a considerable understanding of the administrative practices of others.²⁹

Comparative Research Movement

It all started when the US army landed in alien soil during the Second World War. The army personnel and the military administrators found it very difficult to work in different cultural contexts and became conscious of the multifunctionality of structures, and this awareness led to greater interest in systematic comparative studies. The attempt by the USA for European economic recovery through Marshall Plan and the point four programme for developing nations had initiated comparative study of public administration. Besides these, the American scholars under the UN technical assistance make serious attempts to study the socio-political and administrative set-up in the third world countries. Thus, comparative research in public administration developed gradually with American scholar's initiative. The UN itself has developed a significant world programme in public administration.³⁰

Joint ventures by nations and regional groups increasingly relied on comparative approach to common problems. The Colombo Plan and the Technical Assistance Missions stressed administrative development appropriate to new dimensions of public undertakings. The Australian government took interest exploring with administrative organisations and practices in many areas of the world. All these activities drove towards administrative advancement and increased learning both theoretical and practical.³¹

The American Political Science Association has done a commendable job in establishing a committee to probe into the areas under which comparative research can be made used. The establishment of Comparative Administrative Group (CAG) in 1960 with the help of Ford Foundation was a milestone in the annals of public administration. F.W. Riggs conducted many research programmes, seminars, experimental teaching project and fieldwork. The group members borrowed concepts extensively from social science disciplines like sociology, economics and psychology. It further attempted to identify more essential elements of public administration so that various studies could be organised to present really comparable and

significant material.³² It is because of this Committee that, common terminology in public administration evolved. The committee has also recognised the importance of cultural ecology of public administration—the environmental variations afforded by differences in history, mores, attitudes and ideologies.

The studies covered by the committee was based on geographical orientation relating to Asia, Europe, Latin America and Africa. Some followed subject matter focus such as comparative urban society, national economic planning, comparative educational administration, comparative legislative studies, etc.

The committee had prominent members of political science such as Gabriel Almond, Leonard Binder, James Coleman, Joseph La Palombara, Lucian Pye, Sidney Verba and Myron Weiner. They studied public administration as a subordinate aspect of political activity.³³ Later a conference organised by the Centre for Advanced Studies in the Behavioural Sciences provided a considerable impetus towards the study of comparative research in public administration. In the year 1972, the comparative administrative group was merged with the International Committee of the American Society for Public Administration to form Section on International and Comparative Administration (SICA). It can be said that the period in between 1960 and 1976 was the 'golden era' of comparative public administration. This period was mostly dominated by American and European scholars. It exposed to the Americans the knowledge of third world administrative practices, cultures, political behaviour and the problems of state-building and nation-building.³⁴

Influence of Comparative Politics

Conceptual framework in both political science and public administration emerged by common stimuli and developments in the respective studies or subjects. For both the disciplines 'bureaucracy' has been a common theme for discussion. Both assigned a subordinate role for the bureaucracy in relation to political system. However, comparative models and approaches for public administration are borrowed from the study of

comparative politics. In a chronological sense, the movements in comparative politics and comparative administration have been mutually cooperative.³⁴

In 1953, the American Political Science Association established an *ad hoc* sub-committee on comparative administration which lasted until the creation of the Comparative Administration group (CAG) in 1963. Thus, common comparative conceptual framework, growing interest in politics and administration of the third world countries and the growing concern for an inter-disciplinary approach in social sciences were together responsible for the development of comparative interest in public administration.³⁶

Comparative politics was a well-established and reasonably well-ordered branch of political science. The same cannot be said for comparative public administration. A survey of comparative political study is more useful to understand the impact of comparative politics on comparative public administration. Both western and Indian scholars pursuit are analysed here. Despite a well-known development of comparative studies in politics, its development has been not fully exploited by comparative scholars in public administration.³⁷ Eric Straus who studied the nature of bureaucracy and the role of civil servants in Russia, France and Britain has used the approaches and models of comparative politics. In his study he concluded that bureaucracy is an out-growth of industrialisation and advanced technology and its inevitably deteriorates through bureaucratic degeneration. The levels or the degrees of degeneration can be assessed only from the standpoint of political behaviour and political system of the country. Politics is the directive force in equating public administration from comparative perspective.³⁸

Ferrel Heady who surveyed putative sub-field of public administration concluded that after a period in the 1960s and early 1970s matters are now pretty much in disarray. Guy Peters in his work *The Politics of Bureaucracy: A Comparative Perspective* managed to tackle successfully one particular aspect of comparative studies of administration and bureaucracy, that is, patterns of bureaucratic politics.

In the comparative and developmental literature, Esman and Uphoff's analysis of the role of community based organisation in the development process clearly stands out as one of the most significant studies published to date. The authors survey systematically the universe of local organisations of Asia, Africa and Latin America. In comparative politics, political scientists used various typologies, *viz.*, those based on political economy (Peter Lange and Hudson Meadwell), the dependency approach (Tony Smith), the rejection of western models of development by third world scholars who experimented with alternative views of the process (Howard Wiarda), neo-Marxist emphasis on class analysis (Ronald Philcote), and comparative public policy (Lawrence Graham) in *Comparative Government and Politics* edited by Dennis Kavanagh and Gillian Peelee and in *New Directions in Comparative Politics* edited by Howard J. Wiarda.³⁹ *Government and Politics in Western Europe*: (Yves Meny translated by Janet Lloyd 1990) is a thematic comparative study rather on a country-by-country basis. The chapters on bureaucracy and on executive power are of considerable interest to public administrators. In *How to Comparative Nations*, Dogen and D. Pelassy have constructed an unconventional guide to the conduct of comparative analysis and the construction of social science theory. The above-mentioned perspective comparison is yet to take place in public administration study. The New International Economic Order (NIEO), the benefit of behavioural studies in political science and the most sophisticated communication network have provided new impetus in the field of comparative public administration since 1980.⁴⁰

New theoretical search by political scientists like Almond, Binder, Coleman La Palombara, Pye and Weidner has made public administration a sub-field of political system. Political aspects of administration was given a new thrust in La Palombara's *Bureaucracy and Political Development*. In fact, this era called to an end the politics administration dichotomy and felt that both politics and administration are experimenting with the same problems from different perspectives. No meaningful study of comparative administration is possible without taking the cue from the knowledge of politics.⁴¹

'Bureaucracy' as mentioned earlier is the central theme that is quite often discussed in comparative public administration. In comparing the governments of the world, Morstein Marx isolated four major types of bureaucracies—guardian bureaucracy as popularised by the British, caste bureaucracy as it evolved in Germany and elsewhere, patronage bureaucracy from the United States, and the more modern merit bureaucracy.⁴² The fourth type is the best for modern governments because of its fitness to the technological world. Bureaucracy in general is more effective if it is a partner in political decision-making. No bureaucracy can function without organisational structure. As such bureaucratic organisation became a prime focus for comparative study. Based on who the primary beneficiary is Blau and Scott identified four types of organisations mutual benefit organisation, business concerns, service organisations, and Commonwealth organisations. A good comparative study in Ralph Braibanti's (ed.) *Asian Bureaucratic System Emerging from the British Imperial Tradition* (1966).⁴³ Research on the origins, structure, evolution and performance of public bureaucracies can help both scholars and bureaucrats to understand better the nature of some of the contemporary problems facing the bureaucracies of the world countries.

The most important thing to be noted in comparative study of bureaucracies is the distinction between bureaucracies in advanced states and the bureaucracies in the less advanced states. The distinction is the general perception about the subordinated position of the bureaucracy. In less advanced countries due to weakness of political system or political stability, the political system plays a subordinate role and the bureaucracy has the upper role in policy-making and resource allocation. The relative position of bureaucracy can be well understood only with the knowledge of political dynamics of countries to be compared. This particular aspect has been neglected by both scholars from political science and public administration. For example, in political development theories there is an absolute blackout of the role of administrations and their behaviour.⁴⁴ To consider 'administration' as applied politics

and thereby separating politics altogether is a wrong direction in the field of comparative public administration. Specialised knowledge of politics—normative, theoretical and empirical are still guiding star of comparative politics. An integrated knowledge of politics and administration is the pre-requisite of comparative administration. Depoliticisation of public administration may lead to self-inflicted injuries and wrong theories. The 'Science' of administration is solely concerned with the most efficient means of achieving any given set of political objectives. Further, at the higher levels of administration, a realistic distinction between the boundaries of politics and administration is something very difficult as well as unnecessary. Any distinction if all there is between politics (policy-making) and administration (policy execution), it is just for the sake of institutional convenience.⁴⁵

For example, in Britain, France and in India sometimes the top professional administrators, wield more powers than the politically elected members as far as policy-making is concerned. To conclude, we must safely say that politics is an area of change and indeterminacy and administration provides stability for political actions and both are mutually dependent. Thus, comparative public administrative research must consider those factors which emerged from politics and thereby give a meaningful explanation for administrative phenomena. Besides, it must also take into consideration the various social and economic forces that shape modern administrative system or behaviour. But influence of politics is something more than social and economic forces.⁴⁶

The political aspects of administration was discussed in earlier times by Hegel, Marx, Wilson, Weber, Goodnow, Burnham and the CAG group. They were especially interested in the problems of politics and government and less interested in administrative problems. Public administration as a discipline may provide certain general theories of management of men and resources under a diversity of conditions, yet efficiency and direction of administrative process cannot be rightly judged only in terms of political objectives. Ethical needs of administration are supplied by the preferential order of political ideologies.

Weidner notes that political factors may constrain administration in at least two ways:

1. Political development goals may clash with a wide variety of administrative techniques and methods.
2. Political development goals may run counter to ideas of bureaucratic professionalisation or general concepts of an administrative class.

It is worth noting the comments of Gerald Claiden on the inseparable aspects of politics in administrative study. He viewed that depolitisation is like that of denying political activity to officials and expecting absolute loyalty from them. He further adds that no public bureaucracy exists in a vacuum, none can be abstracted from its social context. Thus, public administration is a tangible mix of the organisations, laws, physical plant and people, conduct observable and identifiable activities, drawing resources from society and transforming them into public services. It is under pressure from many different sources and more so from political side.⁴⁷

In public administration, the bureaucrats list out priorities at the direction of the politicians. Selection of priorities for administrative sake implies value judgements and these value judgements are based on facts which have evolved out of some propositions. Every administrative decision has value component and it is this 'value component' which necessarily integrates administration with politics. As 'value component' becomes an important inquiry in comparative study of administration it is not realistic to ignore values, which have been supplied by the political process of countries under comparison. This is more complicated for third world countries where there are rapid changes in the socio-political milieu.⁴⁸

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3

Models of Comparative Public Administration

Introduction

This chapter gives attention to some important models used in studying comparative public administration. Some confuse models with approaches. There are significant differences between the two. An approach is based primarily on one central concept that is thought to be especially useful in studying basic features of public administration. Models can be thought of as refined and more specific versions of approaches. Within one approach different models can be developed. Models are very specific towards a particular study.¹ On the other side, approaches are general in nature. The world model is treated in this book as treated by Waldo, to mean simply the conscious effort or attempt to develop and define concepts or cluster of related concepts. It is useful in classifying data, describing reality and hypothesising about it. We must also distinguish between the term 'model' and 'theory'. In fact, both 'model' and 'theory' are used interchangeably. Generally speaking, 'theory' is more sophisticated tool than 'model'. However, Herbert Simon, Allen Newell, Waldo and Nimrod Raphaeli used 'model' and 'theory' interchangeably in practice.²

Models in public administration were first introduced impressively by Herbert Simon. His work like *Administrative Behaviour* (1947), *Public Administration* (1950), and *Organisations* (1958) are important contributions to 'model' building in public administration. Herbert Simon's 'bounded relational model' explained the rational way of arriving at decisions.³ Decision-makers are more contented with 'satisfying' rather than 'optimising model' in decision-making which is a major contribution to model building in public administration.

Use of Models in Public Administration

It is not our concern here to discuss various models used in comparative public administration and its several uses. The general use of models are discussed. Our strategy shall be to look at seven models that are frequently used or referred to in studying comparative and development administration. Max Weber's bureaucratic model has the most popular use in comparative study of bureaucracies. The model advanced by Down emphasised the importance of career interests as determinants of administrative process.⁴ Rigg's 'prismatic-sala' model is an intellectual creativity of the model building clan in comparative public administration, particularly with reference to third world governments. Dorsey's information-energy model, the developmental model and Mathur's, model do represent distinctly different and yet in broad sense intellectually compatible models, each of which has proved to be useful in studying comparative administration. Before going for a detailed study of these models, it should be noted that apart from the above-mentioned types, there are considerable number of new models offered. Secondly, there has been a substantial degree of basic similarity in the assumptions and general approach of these numerous models.⁵

Generally, we may point out that models used in studying public administration share the following tendencies:

1. To study the social, cultural, political and economic factors that influence comparative studies (Ecological Model).

2. To use concepts that characterise public administration as a series of actions or behaviours, involved in meeting changing environmental demands.
3. To conceptualise administrative activity in a system way with particular attention to the goal of political system.
4. To deal implicitly or explicitly with the requisites for effective operation of administrative system.
5. To be presented in such a way as to imply their general relevance for the study of public administration.

As noted earlier, the very use of models is to organise informations and facts that constitute the entire study. Certainly unorganised facts are not going to serve any purpose of research. Research findings are useful only when it fits into our established framework or into our established knowledge. In fact, models are replacing our framework of the study.⁶ To some degree models are universal framework of analysis of similar problems under study. Let us analyse each model separately and its proper use in comparative study of public administration. With the help of these models, we can discover the requirement of empirical investigation for some comparative research. We can also narrow down the collection of data, ordering data and postulate relationship among variables.⁷

1. Weber's Bureaucratic Model

Max Weber (1864-1920) presents an 'ideal type' of bureaucracy, which is capable of attaining the highest degree of efficiency and the most rational form of administration. His ideas about bureaucracy first published in 1921 based on legal-rational authority was destined to dominate all other forms of bureaucracy because of its technical superiority over others.⁸

Weber's model of bureaucracy was based on the political questions that dominated the nineteenth century scholars. He had integrated bureaucracy into the larger scheme of the three ideal types of authority. It is legal in the sense that it is based on a style of authority that is legitimated through legal processes. It is rational in the sense that it controlled on the basis of knowledge. It is learnt that Weber was firmly committed to

parliamentary democracy. He supported strong leadership and expected the leaders to protect the mass against its own irrationality, and the individual against mob psychology.⁹ The identifying characteristics of bureaucracies were:

1. fixed and official jurisdictions areas, controlled and ordered by written rules and regulations,
2. clear division of labour with authority and responsibility equally clearly designated, maximising specialisation and expertise,
3. the arrangements of all positions into a hierarchy of authority,
4. all officials appointed on the basis of qualifications,
5. work viewed as a vocation, a full time occupation, and
6. uniformity and impersonality "without regard to persons."

This kind of 'ideal bureaucracy' became the dominant form of civil service sub-system in the industrial world.

It can be lightly pointed out that Max Weber was first to use comparative analysis with rich insights from historical cases. Weber's concept of bureaucracy was mainly constructed as a tool for cross-cultural and historical approach. His idea of universal trend towards increasing bureaucratisation implies the notion of direction in social change.¹⁰

No doubt, there are lot of criticisms against Weber's 'ideal model' as a general identifying criteria for comparative purposes. The first criticism is that such ideal type can never exist at all and even if it exists the model by definition does not lend itself to explain dynamic empirical situations. Schmitt criticised Weber's concept of legal rational authority. He pointed out that the legitimacy is based entirely on accepted legal procedures. It abandons all moral arguments of legitimacy. Eric Straus once noted that it was unfortunate that Weber used the term 'bureaucracy' to define his rational form of administration. However, Weber has indicated some flexibility in his ideal type by presenting mixed type of bureaucracies. Talcott Parson has assessed Weber's authority types and concluded by saying that Weber's model is highly developed and is a broadly applicable

conceptual scheme in any comparative field. No model in the study of comparative public administration provides clearer and more precise guidelines than Weber's bureaucratic ideal type.

2. Down's Model

Anthony Downs explains the lifecycle of bureaus by first specifying the four ways in which bureaus are created. In his explanation he refers to the routinisation of charisma as one of the type of bureau-genesis. Thus, according to Anthony Downs bureaucracy is the result of the common consequences of routinisation of charisma. Secondly, he mentions about the creation of bureaucracy by social groups in order to perform specific functions. The third kind of bureaus is due to splitting of the existing ones and the last kind of bureau as a result of entrepreneurship of a few zealots. His central hypothesis is that bureaucrats are motivated by self-interests.¹²

He goes on to list the various functions performed by non-market-oriented organisations, namely, those social functions incurring external cost of benefits, the allocation of resources to collective good which provide indivisible benefits, the implementation of policies dealing with redistribution of incomes, the regulation of monopolies and the maintenance of framework of law and order in the society.¹³

Downs emphasised the importance of career interest as determinants of administrative process. The application of economic 'market type' analysis to administrative process saw 'bureaucracy' as basically derived from the lack of exposure to an adaptive medium of the market type. In his theory Law of Counter Control he states that the greater the efforts made by top-level official to control the behaviour of subordinate officials, the greater the efforts made by those subordinates to evade or counteract such control. The central assumption is that rational administrative agencies will tend to be 'imperialistic' competing with one another for 'space'. Downs model is much useful in comparing the origin of civil bureaucracies from the above-mentioned perspectives. He differentiated five categories of bureaucrats—climbers, conservers, zealots, advocates and statesmen. Further, development of each of these types, he

argued, could lead to prediction on the forms of bureaucratic politics that would be practised. By classifying bureaucrats on these categories, Down's model is helpful in comparison of employees behaviour which could be predicted from the assumption of each model.¹⁴

3. Riggs's Ecological Model

Contemporary studies in comparative public administration made use of the ecological model developed by Riggs. This model can be used in cross-cultural analysis. He has been concerned primarily with conceptualising on the interaction between administrative system and their environment. His main focus was on 'developing' institutional societies.¹⁵

Riggs further developed prismatic-sala model. The most prominent model builder in the comparative administrative movement is Fred W. Riggs. In fact, as his thinking evolved Riggs a series of overlapping and inter-related models extending Sutton's two ideal models of *agraria* and *industria* to illustrate the relationship between societal structure and whole cultures. Riggs set forth his first major model in a lengthy way entitled *agraria and industria towards a typology of comparative administration*. He suggested illustrative typology of comparative administration systems in 'agraria' and 'industria' and claimed that similar types could be constructed at various transitional stages between the two with similar categories illustrating the interdependence of administrative systems and societies.¹⁶ As his conceptualisation proved too abstract to apply he turned away from general systems models to middle-range theory based on his empirical research in South-East Asia.

Riggs then produced his well-known model of prismatic society. In this model, Riggs changed the key terms from 'agraria-transitia industria' to 'fused society', 'prismatic society' and 'refracted society'. It is based on the structural functional approach and delineates societies according to different social structures. After examining various societies Riggs observed that in some societies a particular structure fulfils only one function, whereas in other societies, a particular structure fulfils several

functions. From this, he argues, we can imagine a purely hypothetical society in which a single structure would perform all the functions necessary for the survival of the society, "let us call it a fused model as well as white light fused." In extreme contrast, let us imagine a situation in which every function has a corresponding structure that is specialised for its performance.¹⁷ We call this situation refracted model just as we say that light is refracted into all the separate axes of a rainbow of spectrum, we might call it the 'prismatic model' because of the prism that refracts fused light.

The three ideal-typical societies are thus constructed on the basis of the extent to which rules in various organisations are exclusive or overlapping. The fused society has almost no specialisation of rules whereas the refracted society is at a high level of structural differentiation, and the prismatic society forms the immediate category. In the prismatic society, a high degree of formalism—discrepancies between norms and realities—overlapping and heterogeneity exist. Riggs has argued, therefore, that a prismatic environment institution of formal structural analysis is likely to produce a disappointing outcome, since what might fail to appear because of a big gap that exists between the formally prescribed norms and the effectively practised action.¹⁸

These models emphasise ecology, and Riggs is primarily concerned with examining how public administrative functions are performed by different types of structures. His approach emphasises open system perspective that has had increasing influence elsewhere in social sciences. However, his approach model lacks the dynamic qualities developed in many other open system models, for he has not analysed the process of refraction from a development perspective. He also does not appear to have worked out fully the implications of his theory on public administration.¹⁹ This is, however, not to underestimate the value of his theory which, as Chapman believes depends on our insight into some of the underlying problems of administrative development in transitional societies. His prismatic theory may, perhaps be especially valuable in understanding the pathology of public administration, as it

may be useful for diagnosis of certain administrative malfunctions. What is noteworthy in Rigg's provocative suggestions is the attempt to place the administrative sub-system into a larger system and to show both its functional relationship and its conceptual consequences. Riggs and others sharing his assumptions have provided a framework for further undertaking in the field, to such an extent that the study of comparative public administration has moved further than have the other sub-fields of comparative political systems.²⁰

4. Dorsey's Information-Energy Model

Another prominent source of comprehensive model building was equilibrium theory by Dorsey postulating as system with inputs and outputs as basis of analysis. He believed that it might be useful in the analysis of social and political system in general as well as for a better understanding of administrative system. It is popularly known as 'Information-Energy Model.'

Johan F. Dorsey's Information-Energy Model is based on a synthesis of concepts of general system theory of communications and cybernetics and of energy and energy conversion. Dorsey's model conceptualises individuals, groups, organisations and societies as complete information-energy converters. Energy is defined as the ability to affect some change of form, time or space in physical relationships, that is, to do work. Energy conversion, conversely, is the manifestation of this capacity or the process of affecting such changes. Information can be viewed as energy in certain forms or configurations. A system converts inputs such as demands and intelligence through various conversion processes of screening, selecting and channelising into outputs. Generally, high levels of information input, storage and processing permit a high energy output. An administrative system produces outputs in various forms, for example, regulation of services for sub-systems and systems forming part of its environment.²¹

Dorsey presented a certain general hypothesis that helps to explain the administrative problems of developing countries in terms of the non-availability of surplus information and energy. His basic hypothesis is that a society's degree of development is

a measure of the information and energy surplus. Developing nations, administrative systems usually scarcity of information input, storage and processing. This results in relatively smaller energy outputs which, in turn, results in an ineffective administrative process ritualistic produces, conservatism and lack of rationality.²²

Dorsey has stressed that research in comparative public administration should focus, if possible, on all of the input, conversion and output aspects of the administrative system, though he adds in particular cases of study, much would depend on the needs and orientation of a scholar. Since his approach views administrative system in the context of their environment, it is essentially ecological. Moreover, as noted previously it has certain elements of a development perspective. However, it is probably because of the model's complex variables and the operational problems associated with it that other scholars have not used this approach in their analysis. Dorsey used his model in his study about Vietnam's political development.²³ The model was later tested by Berenson who used aggregate data from 56 nations to examine the validity of propositions drawn from the information energy model linking three ecological variables such as energy, information and energy conversion in bureaucratic development in the third world. He concluded that the model was a total failure in explaining the bureaucratic changes in the countries studied.

5. Mathur's Model

Mathur in his study analysed Block Development Officers (BDOs) of two different states in India. Before the analysis, he first clearly identified certain geographical, socio-economic and political factors which present a different background for the BDOs of the two states. Employing 'factor analysis' technique, he developed the major dimension of bureaucratic thinking and perceptions so as to establish an empirical pattern of the reactions of the bureaucrats to the changing environment. Thereby, he developed a typology and a profile of the local administrators in a near similar cultural pattern to find out the differences in the perceptions and reactions of the bureaucrats of one state from the other and correlate such differences.²⁴

In this study, the inferences drawn are as follows:

1. The same class of officials (BDOs) of different environmental settings are different.
2. Such differences are due to their different socio-economic and political background.
3. Their behavioural patterns are different because of their different environment settings,
4. Such behavioural pattern differences are also due to their differences in education, recruitment and training methods.

Such models can be made use of similar studies in other parts of the country as well as in other aspects of administrative phenomena and at other levels of state administration. This model, if rightly used, could furnish an insight in to politics and bureaucracy and the perceptions and attitudes of the officials at every level of administration in relation to their work, motivational factors and in evaluating the morale of the employees at every level of administration. Similar studies can be conducted to enquire into the attitudes and perceptions of various citizen bodies and the various social and economic groupings towards bureaucracy, bureaucratic decisions and their expectations of the bureaucrats in terms of goal achievements.²⁵

6. The Development Model

Closely related to the study of comparative public administration an indispensable tool in the attainment of the goals of the 'good' society has attracted the mainstream of comparative administrators seeking ways and means to improve administrative performance and to strengthen the planning and execution of developmental programmes. The idea has its origins in the desire of wealthier countries to aid poorer countries and more especially in the obvious needs of the newly emerging national states to transform their colonial bureaucracies into more responsible instruments of social change.²⁶

It should be noted, however, the developmental administration is not the same as administrative development. Essentially, it is that aspect of public administration that focuses

on government influenced change towards progressive political, economic and social objectives, once confined to recipients of foreign aid but now universally applied. Developmental administration thus encompasses the organisations and development corporations, the reorientation of established agencies such as departments of agriculture, the delegation of administration powers to development agencies and the creation of cadre of administrators that can provide leadership in stimulating and supporting programmes of social and economic development. It has the purpose of making change as attractive as possible.²⁷ Strictly speaking, it may not be referred to as the applied side of comparative public administration as there is no sharp distinction in intent, concept and involved personnel between the two. Those interested in developmental administration are interested in and draw on many sources other than comparative public administration and some of them are trained in disciplines other than political science or public administration.

Development administration is related to goal and action-oriented administrative systems. Since most definitions of the word 'administration' connote the aspect of goal-attainment, the inclusion of the word 'development' might at first seem to be redundant. Nevertheless, the term refers to a particular focus on certain key aspects of socio-administrative change. Also to Edward Weidner, its foremost proponent, the concept of development administration refers to the process of guiding an organisation towards the achievement of progressive political, economic, and social objectives that are authoritatively determined in one manner or another.²⁸ Weidner has argued a separate focus on development administration whose end objectives are related to different administrative roles, practices, organisational arrangements and procedures to the maximising of development objectives. In research terms, the ultimate dependent variables would be the developmental goals themselves. The concept of development administration has two important dimensions. First, it is concerned with the process through which a public administrative system directs socio-economic and political change in the society and secondly, it

studies the dynamics of change within the administrative system. The system enhances its capabilities to withstand undesirable change coming from the environment and to direct desired change.²⁹ In the first phase an image of political scientists interested in variants among legal and party systems who also described and explained cross-national differences among bureaucratic practices emerged.

Development administration has come to mean the study and practice of induced socio-economic change in the developing countries. The image is transformational, directive and cross-cultural. In the field of development administration two shifts in perspectives have occurred during the last two and a half decades. They are

1. pragmatic values and goal orientation, and
2. the social and ecological orientation.

Weidner used a goal-oriented model to study development administration. This model demands great respect in comparative public administration. Cross-cultural studies is possible only by this model. Weidner stressed the goal-oriented model because of the problem in applying Weber's model in his study on third world countries.³⁰ He started with Egypt as a case study and later extended to other countries. He contents that it is possible to have variance in bureaucratic character varying major goals and values pursued by the different countries. Among all other views Weidner much stressed the importance to encourage innovations in non-administrative areas, socio-cultural changes in man's mind and an overall environmental change. These are among the goals of highest priority in the countries most committed to change.³¹

Factor Analysis

The above analysis reflects the inclination of the scholars to the revival of comparative public administration for the study of administrative system form micro-level and at a macro-level perspective. Such studies can be made by employing factor analysis technique. This techniques can reduce the original number of variables to smaller number of independent factors

in terms of which the whole set of variables can be understood to provide a simpler and more compact explanation of the regularities apparent in the attitudinal space of interest.³² Thus, the factor analysis is useful on the following grounds:

1. It takes thousands and potentially millions of measurements and qualitative observations,
2. It resolves them into distinct pattern of occurrence,
3. It makes explicit and more precise the building of facts linkages going on continuously in the human mind, and
4. There is a shift from purely descriptive, normative explanation to empirical, cross-cultural experimentation and interpretation.

Problems in the Applications of Models

The foregoing brief review of some of the models constructed by American public administration for the study of public administration on a comparative basis raises a number of questions about their applications in understanding the administrative systems in the developing world. Which particular model is most appropriate and for what purpose and where should it be applied?³³ The central problem in the study of comparative public administration is that it is large enough to embrace all the phenomena that it should be studies. The second problem is of relating the universal model and the unique in one system. The idea of universal model runs through administrative study for example in the assertions of the founding fathers to the most sophisticated of our contemporaries in the field.³⁴ But to make comparisons implies not only the identification of the universals but also discovering criterion of differentiation.

The existing models for comparison are of limited use because they fail to explain the causes of bureaucratic change. And even if they do, they may be in accurate. Most of the conclusions of comparative studies are very abstract. However, without models or framework by which we can accumulate and relate information there is a difficulty of comparison. This proves the importance of familiarising ourselves with appropriate

models to make a reasonable comparison.³⁵ The choice of models thus is intimately related to the choice of a research strategy and to the most effective employment of limited resources. None of these models listed previously may present a perfect analysis of contemporary administrative scenes in diverse cultural settings. But if carefully used they do serve as a framework for analysing different aspects of administrative phenomena in a comparative perspective.³⁶ These models may be useful in revealing more clearly the social, economic and political basis on which administrative institutions depend. In public administration they are impressionistic and non-quantitative. It is only when we understand their limitations that we can use these models intelligently and safely to help towards an understanding of administrative behaviour.³⁷

Important Comparative Studies

Western Authors

The earliest comparative approach was adopted by Rene Stourm. He wrote the book in French language titled as *Le Budget* in the year 1889, which was translated in the year 1917. In that period the Institute of Government Research entered in its first study of comparison. It was the comparison of the strongly centralised British financial system with the highly disorganised American system. In the conclusion the author supported centralised budget prepared solely by the executive. Leonard D. White in the year 1930 introduced the laws governing the public service in different countries.³⁸ This was done under the auspices of the International Congress of the Administrative Sciences. White just reprinted excerpts from the significant laws and studies conducted within some countries.

Scholars from the Committee on Comparative Politics of the Social Science Research Council were assembled together and presented their papers on issues related to bureaucracy and democracy. The committee members under the chairmanship of Joseph La Palombara accepted the Weber's model as the definition of modern democracy. The committee concluded that in modern democracy, the premature development of merit

system did not seem to be correlated with rapid economic development in non-industrialised societies.³⁹ Economic democracy is the absolute necessity for the bureaucracy to serve the national interests. Some research scholars attempted to compare federal and non-federal workers in the USA. In their study they found that federal employment is more open to minorities, especially blacks. They also found that those of higher socio-economic status think less favourably of the federal service and are less inclined to work there or to think of its functions as legitimate. Aaron B. Wildavsky based his study of budget of the USA on cross-cultural studies. He concluded that the form of budgeting was determined by the predictability of the environment and by the country's wealth. Peters depicted bureaucracy as an agency for bargaining in politics. To him, bureaucracy was heavily influenced in various countries by both its political and its cultural environment. He felt, internal restrictions were to be made more effective than external controls for assuring administrative accountability.⁴⁰

Comparative study on behaviour and attitudes of high-level bureaucrats were conducted in the USA, the UK, France, West Germany, Italy, the Netherlands and Sweden by Joel D. Aberbach, Robert D. Putnam and Best A. Rockman in 1981. The socio-economic characters and attitudes were investigated. The authors were optimistic about the ability of politics to control bureaucracy in the states studied.⁴¹ S. Prakash Sethi, Nebuaki, and Carl L. Swanson made a comparative study of American and Japanese managerial techniques. They attacked the importation of Japanese managerial techniques to the United States. The book emphasised the degree to which Japanese techniques are especially suited to the Japanese culture. Approaches to the study of decisions were compared by Michael A. Murray.⁴² His goal was to integrate quantitative, political and legal approaches to decision-making. He critiqued and described the literature of each approach, and found more common bonds than differences among them. He advocated more emphasis on integration in academic training and on the job experience. Preston P. Le Breton (ed.) gave a theoretical framework of comparative public administration. The edited volume of Ezra

N. Sulaiman examined the relationship between higher civil servants and the great in power in the USA, Italy, Japan, France, Britain, German, Norway and Chile.⁴³ It studied the degree of influence that civil servants exert on the political process in each of the nations. The book illustrates how the higher civil service system is now an essential fact of life characterised by an ambiguous relationship between the higher civil service and the government in power in most countries.⁴⁴

Employing the bureaucratic model of Max Weber, a number of studies were conducted in a comparative context. Significant contributors are Michael Crozier on France, Roy Land on Soviet Union and Morroc Berger on Egypt. The ideal type model of Max Weber posed some limitations on comparative methodology in public administration. Despite such shortfalls developing countries, bureaucracies were studied on this basis. Dwight Wlado viewed that in spite of limited application, Max Weber's bureaucratic model can be applied as a paradigm of comparative public administration.⁴⁵

Riggs's ecological approach became one of the most popular comparative studies. Riggs examined the interactions between an administrative system and its external environment. His typology of "agraria-transitia-industria" systems, developed in 1957 was superseded by the typology of 'fused-prismatic' diffracted societies that was constructed in 1959.⁴⁶ For nearly 30 years Riggs's model of prismatic society and its administrative system known as 'Sala' has ruled the contemporary model building scene in comparative public administration.

A very well known conceptual approach in comparative public administration is of 'development administration'. This approach focuses on certain characteristics of a dynamic administrative system, *e.g.*, goal-orientation, change-orientation, progressiveness, innovativeness, participation and responsiveness. There are a number of other less known approaches to comparative administration. According to F.W. Riggs, 'development administration' refers to administration of development programmes to the method used by large-scale organisations, notably governments, to implement policies and plans designed to meet their development objectives.⁴⁷

Indian Authors

In India the major works, which have incorporated the comparative method of research in a cross-national perspective is as follows:

Among the most prominent writing on general aspects of comparative administration is Ramesh Arora's *Comparative Public Administration* (1972). He interrelated the theories of organisation including those of European and American writers. He described the ecological approach to public administration and developed major conceptual constructs in the field of comparative public administration. Kuldeep Mathur's *Bureaucratic Response to Development*, is an empirical study that compared bureaucrats attitudes against their social background.⁴⁸ Yogesh Atal's *Local Communities and National Politics* relates the process of political development with the exposure of the local communities to new styles of communication. He presented the modernisation trends in a comparative frame. C.P. Bhambhri's, *Administrators in Changing Society* (1972) compared the attitudes of administrators in the context of development administration.⁴⁹ David C. Potter's "Bureaucratic Change in India" in Ralph Braibanti (ed.) *Asian Bureaucratic Systems Emergent from the Imperial Tradition* (1966) presented Indian administration in relation to other, Asian countries. Faisal S.A. Al-Salam studied the ecological dimensions of development administration with particular reference to the social system environment of administrative systems in low-income countries (1977).⁵⁰

1. R.B. Jain's "A Comparative Study of the United States Civil Service Commission and the Union Public Commission in India" (Ph.D. thesis Indian Scholar of International Studies, Jawaharlal Nehru University, New Delhi, 1969) concentrated on the system of personnel administration in the two countries.⁵¹ It analysed the similarities and differences in the role and functions of the two agencies and their overall impact on the system of personnel administration. By this comparative study the author aimed to explore the

possibilities of reforms in the system of personnel administration in India in the background of an advanced system of the USA.⁵² However, he recognised the historical, constitutional, social, cultural and economic factors that have conditioned the working of these institutions in their national settings. The research is mostly based on primary sources and firsthand information collected by the author at the United States Civil Service Commission and the British Civil Service Commission.⁵³

2. D.N. Bhalla's *The Damodar Valley Corporation (DVC): A Study of Transplantation of Foreign Administrative Institutions into India* (Den Hag, 1969) analyses the experiment of the transplantation of the Tennessee Valley Authority (TVA) model in the United States for the DVC in India and examined various political, ecological and cultural factors. It was the first comparative study which attempted to evaluate the impact of the ecological and social factors on the working of 'imposed structures' borrowed from outside the country.⁵⁴
3. K. Mathur's *Administrative Mind in a Developing Nation: An Empirical Exploration* (1970) IIPA, studied the perceptions of local administrative officials in two states, i.e., Rajasthan and Uttar Pradesh. By this comparative analysis he concluded the Rajasthan BDOs to be more inclined towards 'autocracy' than technical leadership.⁵⁵
4. Some authors selected single aspect of administration and adopted the comparative method. But they never made any breakthrough in the study of comparative administration. They failed to note the important dimensions of Indian bureaucratic politics like organisational expansion, manipulation of transfers and postings and large-scale resource misappropriation in the guise of development having virtually gone unnoticed and unexplained.⁵⁶ Some of the works of this category are: R.C. Agarwala's *Comparative Study of the*

Indian Constitution and Administration (New Delhi, 1966), P.K. Wattal's *Parliamentary Financial Control in India* (Mumbail, 1962), C.P. Bhambhri's *Parliamentary Control over Finance in India* (Meerut, 1959), R.N. Aggarwala's, *Financial Committee in Indian Parliament* (Delhi, 1966), D.K. Sinha's *Working of Public Corporations in India* (Allahbad, 1966), Nabagopal Das's, *The Public Sector in India* (Mumbai, 1966), R.S. Arora's *Administration of Government Industries* (New Delhi, 1969), D.S. Ganguly's, *Public Corporation in National Economy with Special Reference to India* (Kolkata, 1963), S.L. Shakdhar's, *Budgetary System in Various Countries* (New Delhi, 1957), J.S. Bhalla's *Public Enterprises in USA and India* (Mumbai, 1969), S.R. Nigam's, *Local Government in India* (Allhabad, 1968), D. Bandhyopadhyay's *An Evaluation of Policies and Programmes of the Alleviation of Rural Poverty in India* (ed.), Islam Rizwanul's *Strategies for Alleviating Poverty in Rural Asia* (Bangkok 1985), P.R. Braibanti's (ed.) *Asian Bureaucratic Systems Emergent from the British Imperial Tradition* (Durham, 1960).⁵⁷

Major Sources for Comparative Study

The International Review of Administrative Sciences publishes original contributions on a wide range of topics related to public administration. It publishes articles dealing with developments in individual countries but preferences are given to manuscripts and symposia that study topics of universal interest.⁵⁸ Social policy and administration is an indispensable source of reference for teachers, students and policy analysts. Most of its articles are based on inter-disciplinary approach on a variety of subjects, particularly health care, social services, poverty and the welfare state. *The Journal of General Management* examines economic, social political, technological and administrative issues. *The Journal of the Royal Institute of Public Administration* aims to publish articles in public policy-making process. R and D Management intends to promote management knowledge which takes place throughout the world⁵⁹. It provides a forum for typing theoretical aspects to the practical needs of industry and

government. *Parliamentary Affairs—A Journal of Comparative Politics* covers many aspects of government and politics. *Public Administration and Development—An International Journal of Training, Research and Practice* reviews and assesses experiments of development administration in the Third World.⁶⁰ *The Canadian Public Administration* is a quarterly publication. Most of its articles is on Canadian administration, but it also presents a comparative study of Canada with European countries. *The Public Administration Review* is published by the American Society for Public Administration and also deals with comparative studies.

The Journal of Indian Institute of Public Administration (New Delhi), *The Journal of Administrative Science* (Chennai), *The Journal of Political Science*, *the Indian Political Science Journal* and *Yojana* are important sources of materials in India.⁶²

Comparative Perspective of Government Reports

Many reports of Central Government are published from a comparative perspective. Reports of various kinds for particular aspects of government describe the practices and procedures in different countries corresponding to the aspects dealt within the reports. Apart from this many articles were published in periodical literature from comparative dimension. Most of these articles appeared in *The Indian Journal of Public Administration*, IJPA Publication, New Delhi.⁶³

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4

Political and Policy Making Bodies—A Comparative Study

A Brief Background

The administrative study of a country depends on its political system. It is the political system which directs and influences the process of administrative actions. It is only through political system the policy is made and policy implementation is left with administrators. Therefore, policy making or policy choice is the major function of political system. But in modern political systems the line of demarcation between policy making and policy implementation is very difficult to make, particularly in the higher echelons of administration. Most of the advices regarding policy choice and decisions are quite often made by the civil servants.¹ However, from the constitutional point of view, it is the political system (more specifically, the legislature) which has been assigned the most difficult task of modern government, *viz.*, articulation of public interest in the form of public policies. The political choice of policies again is not only the function of elected representatives, but also there are other 'actors'. In liberal democratic countries like India, the USA, the UK and France the other major or main actors are—competing parties, a free press, pressure groups, the rule of law, free election

and public opinions. These different groups act in a different way on the proposed policy of the legislature.²

There may be competitive claims and counter-claims from different quarters. The government law-making agency has to satisfy these different claims. Thus, the pattern of political system and its nature of making laws is of foremost importance for the study of administration. Because, it is only after the choice of policy, the question of administering comes to the picture. The four countries which we have selected share common features, yet, they differ in other ways. The main features are India—parliament liberal democracy, the United Kingdom—a constitutional monarchy, the USA—true constitutional-federal state and France—the mixture of both presidential and parliamentary democracy. The former Soviet Union needs a separate treatment because its political system was totally different from the above said four countries. Even though the USSR collapsed (in the year 1989-91) it is necessary to study its working because its political administrative practices are considered to be a universal Marxian model of political system adopted by many underdeveloped or Third World countries.³

There are also basic differences among these countries with reference to their political system. For example, the USA, as its official title reveals, is a federal republic, the United Kingdom is a monarchy. In the USA, the president is elected directly by the people, and is politically powerful, whereas in India, the president is elected by the Electoral College, and he is politically almost impotent.⁴ India is a constitutional republic with quasi-federal features and the Soviet system was made up of a unique blend of institutions and procedures and proclaimed themselves to be Marxist-Leninist state on the road to communism. Communist political party and the former Soviet political system are something which cannot be studied separately.

Such variance in political systems create another problem, the problem of comparison. Besides, it is also difficult to comprehend their political systems with their similarities and differences. Such problems of comparison can be solved by selecting the most appropriate paradigm of comparison of political systems. Among vast areas of comparison of political

system, the most appropriate work is the use of David Easton's *Political System Model*. We can use the abstract model of Easton to reveal the basic features of political process and the major purpose served by the political systems. There are practical forms of comparison which the academicians can use, in a less scientific mood, and useful ends can be served by such practical activity. The studies of political system most often presents more complicated form of comparison and it can be satisfactorily compared in the most unsophisticated way.⁵ Here, the purpose of comparison is unsuccessful, when it is able to describe two or more phenomena of political process.

Comparative study of political system by recent authors since the publication of David Easton model raises many interesting questions. In comparative study the authors more often find it difficult in justifying their framework of comparison than the comparative study itself. It is sacrificing the ends (output of comparative studies) for the sake of means (comparative framework and methodologies). But here I want to stress that I am simply not going to be fascinated by the galaxies of comparative paradigms developed by my colleagues elsewhere in the world. I want to be at ease while comparing political systems because any complication in methodology will lead to difficulties in the 'output' of our comparative study. To my mind, the most simple way of studying comparative political system is certainly that of Easton's model. The said model is very direct and essentially simple in conveying the nature of the political systems. Easton in his 'model' observed that political system is composed of processes through which the wishes and needs of the people are converted for better or worse, into government actions. Briefly, his views of politics envisages a two way process of communication as well as responses, linking governments to electorates.⁶ It can be diagrammatically presented, as in Figure 1.

The above net result of David Easton's system model is that his framework enables us to identify certain key elements in the political process. The various demands made by the public are channelled into the political system by intermediary groups such as political parties, pressure groups, and the mass media. The

political system receives all these demands and priorities. These demands and then transmits them as issues to the legislature and to the concerned authorities. The legislature with the help of the bureaucracy decides what to do about them, and eventually act upon them by passing laws, changing existing laws, making treaties, etc.⁷ In democracy these actions of the ruling party maybe criticised by opposition parties. The actions of the government will both publicly justify their policies and defend their decisions. Other groups, such as pressure groups, interest groups and individuals may either support or oppose or remain indifferent. This process of feedback, through the various channels of political process communications, influences the shape of future demands.

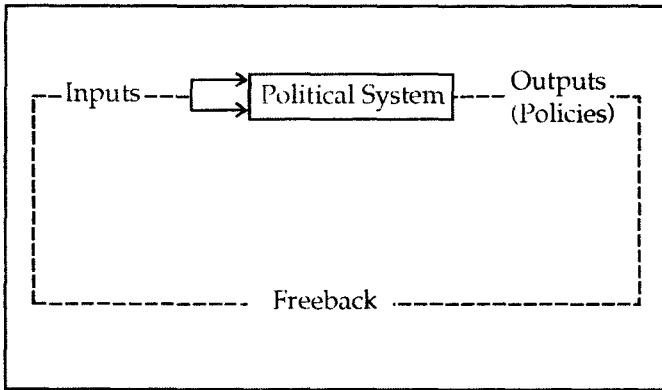


Fig. 1 David Easton's Political System Model.

If the legislature and its related authorities succeed in satisfying, the majority of the people most of the time they gain political support otherwise they will be thrown out from the power. Thus, unsatisfactory situations may lead to change in government and the position of certain authorities. If the entire system is weakened due to rapid and successive changes of the government, then the political system itself has to be changed. The change in system may be affected by peaceful means or by means of revolutions. If one turns the pages of history one can note that such changes took place in Germany in 1933 when

Hitler assumed power and in France in 1958 when De Gaulle's Fifth Republic replaced the discredited Fourth Republic. In recent times, there are numerous examples where the system has been changed because of its weakness. For example, in Sri Lanka, the system was changed from parliamentary system to presidential system in 1978. The disintegration of the USSR led the Russians to draft a new political system. Changes in political system have taken place in Spain, Greece, Portugal, and South Africa and in many newly emergent Asian and African countries.⁸ As noted earlier, it should be remembered that any change in political system will definitely affect and modify the administrative system which is considered to be the sub-system of political system. Instead of uprooting the entire political system, there are incidents wherein slight modifications have been carried out by the political leaders. Such slight modifications will have an indirect impact on the administrative system.

The causes of changes in the administrative set-up of a country may be due to political system variance. Therefore, it is important for us to enlist the major factors which had resulted in the modification in the political system. Logically, one can assert that the 'crises' of political system are the 'change agents' of administrative sub-system, administrative culture and behaviour. This makes us question the major crisis situations that nations seem to go through, in order to attain a stable political system.

Some political theorists have enlisted some major crises that a nation may face before attaining a stable political system. They are

1. Identify,
2. Legitimacy,
3. Penetration,
4. Participation,
5. Distribution.

These crises are referred as sequence of political development which is further classified as follows:

1. *Identify*: People a national identity over and above their tribal, regional or local identities. That is people in India

should think themselves as Indians first than of their linguistic or caste identities. Most of the non-western and former colonial governments are still caught up in their identity of crisis.⁹

2. *Legitimacy*: People should develop a sense of satisfaction that the present rule of the country is rightful, and it should be obeyed. A political system without legitimacy requires massive amounts of coercion to keep it intact and functioning. This may cause undue strain to the peace regulating agencies of administration.
3. *Penetration*: Any kind of unconstitutional methods of resistance are to be suppressed by the police or military brought into enforce national authority.
4. *Participation*: After resolving the above said 3 crises people need to participate in the policy-making process of the country. The traditional elites sometimes reduce to allow the political participation of the down trodden and as a result non-participation of a particular section of the society can lead to a build up of a revolutionary struggle.
5. *Distribution*: This is one of the greater crises of political development. This problem relates to the division of nation's wealth. It can only be reduced by extending certain economic concessions to the demanding groups.

It all the above said five major crises appear at one stroke, then the political system will collapse. On the contrary of each of these crises arise one after another, then the political system will be able to grow and adapt with each challenge. In most of the Third World countries all these crises appear at once and exert heavy strain on the political system, thus weakening it. Breakdown may lead to civil war as it happened in Rwanda or to a military rule in the case of Nigeria. Thus, the sequence model is helpful in understanding under what circumstances a country's political system has to be replaced *vis-à-vis* the administration of that country. The sequential model expounded by the political scientist is a controversial model and never explains what could happen if one or two sequences are

bypassed. However, it is important in explaining under what situation a country's political system has to be modified or changed as per the demands of the sequence-crises.¹⁰

To make a good comparative study of administration, it implies an understanding of policy field, *viz.*, the political system. As a way of understanding how the administrative system operates, it is again necessary to study the relationship between the political system and the administrative system of a country. Because, the values nurtured by the administrators are mostly determined by the political environment in which the administration operates. Besides, these political influences of the administrators are unknown and unquantifiable. The forces that exert influence on the administrators should be taken into account. In fact, comparative administrative movement was motivated partly by a sympathetic interest in the needs of developing countries where they experienced more political instability than that of the west.

The political system of the USA, India, the UK, France and the USSR will now be outlined briefly in terms of David Easton's comparative framework. Details of administrative parts of these systems will be discussed in an elaborate way in the succeeding chapters.

Comparative Political Systems

It is the constitution of a country which lays down the basic structure of the political system. In fact, people are governed only through a constitution. It is the constitution which establishes the three organs of the government, *viz.*, the legislature, the executive and the judiciary. It defines their power, demarcates their responsibilities and regulates their relationship with each other and with the people.¹¹

India, the USA, France and USSR have a written constitution. The constitution of the UK is unwritten and based on conventions, traditions and customs. The United Kingdom is the only political system having an unwritten constitution. Besides, some authors use to classify a constitution as federal and unitary. The UK and France are unitary constitutions. The classic example of federal constitution is the USA. In a unitary

constitution, all powers are vested in the central government to which the authorities in the units are subordinate. They function as the agents of the government at the centre and exercise authority by delegation from it.¹² In federal policy, the constitution has some general features, *viz.*, a rigid written constitution, supremacy of the constitution and a provision to divide the power between the centre and state. The Indian constitution has been variously described as quasi-federal, federal with a strong unitary or pro-centre bias. It is federal in structure but unitary in spirit. It cannot be claimed as federal because the residuary power are vested in the Union. The USSR constitution does not provide a precise detail on the relative powers of the centre and the republics. Soviet constitutionalism differed significantly from that of the USA, India and France. The aim of the four Soviet constitutions promulgated in 1918, 1924, 1936 and 1977 is to define the functions of political institutions. They reflected the Marxist-Leninist approach to popular sovereignty and the scope of political in socialist society.¹³ The constitution reflected the collectivism of the Soviet system in stressing that the interests of the individual was subordinate to those of society as a whole. It also emphasised that individual rights were inseparable from duties. Interestingly, there was no formal separation of powers among the three organs of the government or between the centre and republics. The American constitutional concept of checks and balances is something unknown to Soviet constitution. The constitution did not set limits to the state power and above all there was little attempt to define the powers of the Communist party.¹⁴ The operation of Soviet political system had always been more a matter of convention and informal practices than strict definition of prerogatives. The Soviet constitution could be changed by the Supreme Soviet much more easily than the the USA, India and France constitutions. In short for India, the USA, France and Britain there has been a history of constitutionalism. While there was no such thing for Soviet Union. The Soviet constitution applied the principle of the dictatorship of the proletariat. The constitution said that Soviet Union was a federation that is, it was composed of fifteen "republics" with some local powers.¹⁵

As mentioned earlier both Britain and France are Unitary Systems, concentrating, power in the central government. France is more strongly unitary than Britain, because in Britain local government like cities and counties enjoy a certain autonomy. A comparative political study of Britain and France is more feasible, since both of them are unitary governments. But the basic difference is that the British constitution grew gradually and peacefully while it is not so with France. The present constitution of France was promulgated in 1958 as Fifth Republic Constitution. The constitution devised, has been called a "Semi-presidential" system. But in practice, the Fifth Republic functioned as a presidential or even "Super-presidential" system. The Fifth Republic has concentrated on giving the executive every facility to govern. Thus, the Fifth Republic constitution favoured a centralised system for national and local governance.¹⁶

To have a complete picture of constitutional characters of these five countries we can state as follows:

1. The American constitution is written, federal, rigid and there is application of separation of powers between three organs of the government. It is a classic example of presidential system with constitution assuming supremacy.
2. The British constitution is unwritten, unitary, and practices, conventions, customs and traditions. The UK is a typical example of constitutional monarchy.
3. The French constitution is written and offers a quasi-presidential regime. There is a highly centralised system envisaged by the Fifth Republic Constitution (1958). The French National Assembly delegated its constitutional power to the executive in 1958, but it did not permit the executive to establish presidential executive on American lines.¹⁷
4. The Indian constitution inherited the British colonial legacy in its political system. It is written, neither flexible nor rigid, quasi-federal, parliamentary republic. There is parliamentary supremacy in India.

5. The First Soviet Constitution (10 July 1918) established a strong link between the Communist political party and the political system. The constitution drafted in subsequent periods reflected commune democratic concepts of state organisation with no separation of powers. There was fusion of executive and legislative functions. The first part of the constitution consisted of a 'Declaration of the Rights of Toiling and Exploited People' rather like the French Declaration of the Rights of Man. The constitution claimed that the USSR was a federal system and applied the principles of the dictatorship of the proletariat.

Comparative Study of the Executives

Among the three organs of the government, executive domination is a common fact of any political system. Executives are the major actors in duly organised political systems. However, there is considerable variation in executive powers of the USA, the UK, India, France and the USSR. Such variations are related to the extent to which executives manage to make the most of their potentiality with large array of political resources available to them.

Parliamentary Executive

British parliament is known as 'mother of parliament'. The basic features of parliamentary form of government is that the executive is responsible to the legislature and the decisions of the government are taken collectively by the members of the cabinet. In parliamentary system, two kinds of executives are to be noted down. They are the nominal and the real executives. Thus, in the UK and in India, there is a clear distinction between "head of state" and "head of government". In the USA, such distinction is ignored because the two are merged into one in the presidency. In India, the nominal executive is the president who is not directly elected by the people.¹⁸ He is elected by an electoral college consisting of members of the parliament and the state assemblies. In Britain, the nominal or ceremonial head of the state is the monarch. The constitutional monarchy in the

UK is hereditary. Sir Walter Bagehot mentioned that British monarch, as head of state holds a lot of symbolic, but not real, political powers. He or she "reigns but does not rule." The British government is headed by the Prime Minister and the Council of Ministers. The Prime Minister of the UK is the real executive, a politician and periodically has to fight electoral battle. The Prime Minister is the lynch pin of the British political system. He is appointed by the monarch from the single party after the general elections. Later, the Prime Minister selects his cabinet colleagues and this controls the cabinet which is the supreme policy-making body. Both in the UK and in India, the head of the state is only nominal or constitutional head of the-executive branch. They act only with the aid and advice of the real political executive which is the Council of Ministers. While the British nominal executive is hereditary, the Indian nominal executive is republic with an elected president. The concept of "Republic" is unique to India. It refers to that of state in which people are supreme and sovereign. There is no privileged class and the public offices are open to every citizen without any discrimination.¹⁹

The American president is the real and the only political executive. He is both the chief of state and chief of government combining the status and influence of offices which are separated in the British, Indian and French political systems. The USA President has guaranteed tenure for at least four years while the Indian, British and French executives may be overthrown by parliamentary votes of no confidence. He is the chief of the executive branch, while the Indian, British and French Prime Ministers are not clearly the hierarchical superiors of the other members of their cabinet. American and French presidents are directly elected by the people. Comparatively, the American president is relatively stronger than his French counterpart. Yet, the stronger position of the the USA president is somewhat neutralised, by his lack of control over the legislature. The Congress (legislative branch of the USA) is a powerful participant in the contest to control the executive branch. In fact, the conflict between executive and legislature is deliberately built into the constitutional system, making presidential control of the legislature difficult, if not impossible.²⁰ There is a cabinet to

assist the American president who appoints them. But they are not responsible to the legislature as in India, the UK and France. There is no collective responsibility among the members of the American cabinet. While in others, parliamentary cabinet members are politicians who are elected directly by the people. The American cabinet consists of experts from universities, law officers and politically unknown personalities.

The French executive is possibly the strongest executive. The French president makes all policy decisions. He is subject to weak external control of the electorate, and he controls a government with extensive, though far from total control of French society. The rules of the Constitution of the Fifth Republic provide executive powers in many ways. Since 1962, they have provided for the direct election of the president of the republic. He is the effective head of both the government and the state like that of the American president. The French executive since 1958 exercised considerable powers and it is regarded that the executive is independent of the government. Thus, in some respects the French executive resembles the American executive and in some other respect he follows the practices of parliamentary system like the appointment of Prime Minister to run the government, cabinet with collective responsibility etc. The French system has been rightly called "Semi-presidential."²¹

In Soviet Union, the Communist Party dominated the entire political system. Communist Party was the watchdog of the USSR government. Supreme Soviet was the legislative branch of the USSR. The Supreme Soviet was a bi-cameralist body and members had a four-year term. It elected a governing body known as the presidium of the Supreme Soviet. It consisted of 20 members of legislature elite whose membership overlapped with communist party's portfolio. The presidium functioned as collective presidency of the Soviet Union. The Chairman of the Presidium was considered to be the head of the state. The Supreme Soviet elected the functional equivalent of a cabinet. However, in practice, most of the members were from communist party politburo members. Therefore, the Soviet Council of Ministers and its chairman can be considered the

weakest of executives. They lacked autonomy whatsoever and existed only to implement the policy laid down by the presidium of the Communist Party of the Soviet Union. There was a unique blend of three organs of the government under the Communist Party. Thus, Soviet constitutional thought did not recognise the separation of powers as a cardinal principle. There was only one party system in Soviet Union where the executive or the party was dominant.²²

The comparative study of executives in these five countries clearly demonstrates that each of these countries developed varied types of executives according to their political needs and from their own historical experiences. Further, the power of the executive never remained static and they are constantly changing to the changing needs of politics. As we mentioned in the beginning whenever there is a slight change in the executive branch its impact is immediately felt in the entire administration. The executives of the countries compared above have the following core characteristic features. They are as follows:

1. United Kingdom: Parliamentary system.
Nominal Executive (Constitutional Monarch),
Real Executive (Prime Minister and the Council of Ministers).
2. India: Parliamentary System
Nominal Executive (Republican President),
Real executive (Prime Minister and the Council of Ministers).
3. USA (Presidential Type):
Real executive—The president who is both the head of the state and the government.
4. France: (Quasi president type)
Real Executive: President (Prime Minister and the Council of Ministers).
5. USSR:
Executive
Supreme Soviet—Chairman of Communist Party
Presidium – Party Leader.

There was a unique blend of executive and legislature under the overall control of the communist party. In reality, it was the party president who really enjoyed most of the executive powers under the direction of the Communist Party.

Policy-Making Institution—A Comparison

The relationship between politics and administration is that of one between ends and means. Political objectives of a state are much wider in their scope. Politics is specifically concerned with the use of state power and thereby realising its major objective. What are the major objectives of 'state' is a debatable question. According to Aristotle, the state exists for the goodness of the society. Since then, there is gradual increase of state activity and today it almost touches every aspect of human life. Traditionally the 'state' existed for protection of life and property of persons in the society. Political scientists in olden time referred to such states as 'police states'. The birth of various political ideologies in the early part of eighteenth century and during the nineteenth century altogether changed the concept of state. From 'police state' it changed into a 'welfare state' wherein the state activities have expanded and enlarged.²³

A comparative study of policy areas clearly shows the following standing for USA, UK, India, France and USSR.

USA

Despite bureaucratic intrusion in different fields of policy areas the congress successfully managed to reassert its fundamental role in policy-making. One of the unique features of major policies in the USA is its legitimacy and descriptive set of constitutional rules. The political party influence over the policy matters is effectively controlled in the USA by federal legislature. However, strong party caucus has never failed to influence the policy matters on specific issues that affect their region.

UK

The British parliament does not share much in policy-making. Policy is largely determined by the executive, *viz.*, Prime Minister and the Council of Ministers. Unlike the American

experience, the policy-making power of the legislature is influenced by the strong party machinery. The existence of two party system, the Conservative and Labour Party is one political reason—why there is great influence of party over the policy areas of parliamentarians? Further, the Upper House, the House of Lords, has since 1911 enjoyed only a suspensory veto over policy.

India

Out of 19 federal policy states in this universe, India is the largest populated country and in terms of territory it is fifth largest. The Constitution of India has an inbuilt bias in favour of greater centralisation power, and for allocation of larger jurisdiction to the centre. It cannot be called as a true federal state because the Constitution of India provides for single citizenship, a single integrated judiciary, uniform civil and criminal law for all federating states, a unified All India Service (vide: Articles 5, 11, 14, 15, 16, 44, 131-41, 312), general supremacy of the union parliament and executive in all matters *vis-à-vis* the states (Art. 365) residual powers to the union (Articles 245-46, 249-54, 356)²⁴ and easy procedure for constitutional amendment (vide Article 368). The federal system can be changed into a unitary system by using the powers of emergency under Articles 352, 356 and 360 by the central government.

It has a political system of parliamentary democracy. The parliament consists of the president and the two house—viz., the Rajya Sabha (Council of States) and Lok Sabha (House of the People). The members of Lok Sabha (543+2) are directly elected by the people on population basis. Members of Rajya Sabha are elected by the elected members of the State Legislative Assemblies in accordance with the system of proportional representation by means of single transferable vote [Article 80(4)]²⁵ The two houses of parliament enjoy co-equal power and status in all spheres except in financial matters and in regard to the responsibility, of the Council of Ministers, which are exclusively in the domain of Lok Sabha. Comparatively it is much powerless than that of American and French Senate.

In the field of policy-making, the Cabinet and the council of ministers are aided by 78 departments headed by civil servants. Besides, the Secretariat of the President, the Prime Minister, the Cabinet and the Planning Commission, consists in total 69 secretariat offices of the union government. However, the major policy initiative is largely confined to three important ministries such as the finance, commerce and industry. Seemingly, the rest of the ministries and other agencies of the government plays an in significant role in the making of the policies. As a result, the higher echelons of Indian bureaucracy turned into a substitute for the popularly elected representatives.²⁶

France

France is the example of a parliament under a hybrid presidentialist regime. The French government is responsible to parliament. But unlike India and the United Kingdom, parliament power is circumscribed in controlling the executive and to legislate. Like the American executive, the Fifth Republic favours executive powers in many ways. The president of France is stronger than the Indian executive or the real executive of the United Kingdom. The French president makes all the major policy decisions.²⁷ The role of the presidency, with seven years term of office, was strengthened substantially at the expense of parliament. In the field of legislation, the French president can refer back a bill that has been duly passed by parliament for reconsideration and on his decision a policy issue can be decided by referendum, by passing the parliament. Such ordinary executive power is not vested among the political executives of the UK and India as well as in the American presidency. Direct presidential election since 1962 further eroded the French parliamentary powers in policy areas. Thus, in the field of legislation, the parliamentary supremacy was removed under the 1958 constitution. In short, the real power house of policy-making is that of presidency and it is not answerable to the parliament. However, in India and the UK, the political executives are answerable to parliament and in the USA the executive powers are controlled by the Congress and the Judiciary.

USSR

In former Soviet Union, the relationship of the Communist Party and state was complex one. The party, however, was not to be identified with the government or state, despite its close links with them. The party was in effect the senior executive branch of the Soviet government where all decisions were made. The Supreme Soviet and the Council of Ministers acted as the junior administrative branch implementing decisions taken within the appropriate party committees. State and government in Soviet Union were controlled by the communist party. The party was the ultimate decision-making body and retained final control over the formulation of policy. Political parties in the UK, India, France and in the USA is something external to the political system but in Soviet Union, the party, state and government were locked into a complicated relationship governed by formal and informal relationship.²⁸ The political levels of decision-making (legislation) and the administrative level of decision implementation was thoroughly intertwined.

Problems of Comparative Policy Study

There is much scope for the discontent on what constitutes policy study. To say that policy-making is the field where political executives and legislators have much stake, means that we have not completely studied the other forces behind policy-making. For instance, without the co-operation of public officials public could rarely be formulated and never put into effect. In modern democratic countries like India, the UK, France and the USA bureaucrats acquire political significance and, therefore, they are indispensable as far as policy-making is concerned. However, in the democratic political systems of India, UK, France and USA they are expected to be the handmaidens of the people and their elected politicians.²⁹ To what extent, bureaucrats influence the public policies is a question very difficult to answer in an objective sense. Such bureaucratic influences much depends on the historical evolution of civil service and of the constitutional framework within which it operates. Besides, there are other factors such as:

1. Bureaucracy perception of its policy-making role and that of politicians.
2. The rules and conventions governing overt party political involvement of officials.
3. The impact of politicians on civil service appointment.

From the countries that we have studied it is clear that the historical development is the first important factor and secondly, the extent to which politicians insist that a relationship of trust between them and senior officials is to be buttressed by bond of political sympathy.

Historically both in the USA and the UK the first consolidated the system of representative government in the hands of elected politicians and thereby civil bureaucracy plays only a subservient role when compared to India. In France, historically there has been fusion of administration and politics at the top. In that case, French politicians openly recognised the significant role of administrators. In the USSR, since the October Revolution, 1917, centralised scientific planning was characteristic of Soviet Society which led to the overall control of public policy machinery by the members, Communist Party leaders and the bureaucrats. There was little scope for legislative or public initiative in the field of policy-making. It is the 'socialistic value'³⁰ perceptions of the party leaders which guided the policy initiative in the USSR. Bureaucracy in Soviet Union included management in industry as well as state and party administration.

On the contrary, India was compelled, for various historical reasons, to accept the entire colonial administrative machinery and even the high ranking personnel who had loyally served the British Colonial administration, on the one hand, and the democratic governments on the other which became the principal contradiction in the Indian situation. Though it is inherited the British legacy of colonial administration, it never failed to represent the 'values' and programmes of the Congress Party. The British practice of 'neutral bureaucracy' was changed to 'committed' bureaucracy in order to realise the social and political objectives as enshrined in the Constitution of India. The

political policy-making role is gradually on the increase by the civil servants in India.³¹

Public policy comparison is problematic since different countries have been evolved from varied historical settings. Besides, comparability depends on discovering common characteristics of historical events or development. Secondly, public policy comparative study is valid and reasonable only in those countries where an element of 'political stability' has been attained. Because instability is one major cause for civil servants to acquire more powers than they otherwise can acquire. During the periods of political instability, the policy-making political members would concentrate more on political manipulation and leave policy-making responsibility to the permanent non-political executives. The problems of political stability lie not in the bureaucratic structure but in the political sphere. While bureaucratic organisation limits the scope for political initiatives by politicians, it does not itself eliminate political authority.³² A bureaucracy initiated public policy does not necessarily produce bad, inefficient, arbitrary or even illiberal government, they are merely systems in which there is no public control.

Generally in policy-making, parliament or legislative powers are considerable. The position varies from country to country and from system to system and is determined by an interplay of fairly stable constitutional elements and of more ephemeral elements such as the political climate, the strength of parties, the nature of policy matter, and the character of the personalities involved. The various systems fall within a spectrum, one end lies the Soviet Union, where all effective power is denied to the supreme Soviet (legislature), and in the other is the USA, where the principle of checks and balances assures the legislature a co-ordinate role with the executive. France, India and the UK occupy intermediate positions. The party dynamics influences the situation. The knowledge of political dynamics, however, is unsystematic, and facts known about the various states are often acquired in different contexts so that comparison is extremely difficult. A general paradigm of policy studies is not only difficult but tends to lose sight of the political realities under which policy emerges.³³

It is interesting to note that public policy in liberal democratic countries are affected by various means by interest groups. Their impact or influence on public policies are not the same as it happens elsewhere. The powers of different types of interest groups classified by Almond and Coleman in their book *The Politics of Developing Areas* are as follows:

1. Institutional Interest Groups (legislature, political executive, armies, bureaucracies, churches and the like),
2. Non-associational interest groups: kinship and lineage groups, ethnic, religious, state and class groups,
3. Anomic Interest Groups (riots and demonstration), and
4. Associational Interest Groups (Trade unions, organisation of business or industrialists, ethnic associations and civic groups).

These interest groups are often less visible than the parties in their political activities and their exercise of influence are more varied. In certain cases, they are more influential in affecting the options and outputs of government. They usually confine themselves to specific issues or sectors of public policy. In the UK the most powerful pressure groups are mainly concerned with economic policy. The Trade Union Congress in the UK nearly represents over 12 million employees. Many industrialists in the UK come under the banner of Confederation of British Industry³⁴.

There are professional associations like British Medical Association, etc. In France also pressure groups are mostly formed to exert pressure on economic policies of the government. trade unions in France are much fragmented than the British and American Trade Unions. The largest organisation is the Confederation Generale du Travail (CGT). Agricultural trade unions in France are also fragmented on political lines. The dominant trade union for agricultur in France is Federation Nationale des Syndicates d' Exploitants Agricoles (FNSEA). Organisational fragmentation has considerably affected the influences of pressure groups on public policies more in France than in the UK and the USA.³⁵

In the USA, pressure groups bring their own concerns directly into the public policy-making process. Many of the USA government policies are, in fact, made for particular groups than being inclusive in scope. There are around 12,600 national level pressure groups devoted to everything from sports to religion, education, business, and science. The largest number of active pressure groups represent the business community, *viz.*, National Association of Manufacturers, American Bankers Association and the US Chamber of Commerce. As far as labour associations are concerned, they are not well organised as in the UK, India, and France. Unlike India, the UK and France, the labour unions in the USA are not formally affiliated with political parties. The American Federation of Labour (AFL) has been organised to represent skilled workers in craft unions. Besides, there are also professional pressure groups for lawyers, doctors, dentists, teachers, scientists and so on and so forth. The scene in Soviet Union was entirely different from the other countries. The state prohibited any form of pressure groups, which goes against the interest of communist parties. Even social and family values were nurtured and fed through the Communist party machinery at various levels.³⁶

Public policy in India is generally shaped within the constitutional framework. Nevertheless, it has been constantly influenced by political parties, pressure groups, linguistic, religions, ethnic, economic and professional groups. The CITU, INTUC and the Mazdoor Unions are major national level Labour Unions. These various labour groups are affiliated to some political parties and thus they are fragmented. The Kisan Sabha, the Union of Indian Farmers (70% of the labour force in India are dependent on agriculture) is becoming an important force to reckon with. The government and the administrative machinery in India are firmly closed or not very responsive to pressure group influences (as it happens in the USA, the UK and France) on major policy issues. This has resulted in information gap, a vital input in the policy process and considered to be a major crisis of political development.³⁷

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5

Administrative Structure— A Comparative Perspective

Administrative structure is not something that you can physically feel about it. It is not even the layout of offices or factories though they are a part of it. By administrative structure, we mean the tasks for which people are assigned, to whom they report, with whom they work and interact in order to get their job done. In the administrative structure of different countries we intend to study government's organisations and to observe how various functions are allocated, performed and co-ordinated.¹ Generally work of governments can be allocated on certain basic principles. They are known as 'bases of organisation'. According to Luther Gullick, there are four major aspects of organising administrative work. He classified it as follows:

1. The purpose;
2. The process;
3. The persons, and
4. The place.

The above referred four bases of organisations are competing principles of organisation and are useful for classifying the work of modern administration. Though its worthiness was debunked

by Hebert Simon, they are still used as 'diagnostic' criteria. Each base of administrative organisation has some unique characteristic features.

1. Purpose

Administrative organisation based on 'purpose' principle brings together those who are at work endeavouring to render particular service. Usually federal governments quite often opt for purpose-based administrative organisation in order to bring meaningful co-ordination of related programmes on behalf of the president by purpose-based organisation it is meant executive control over various administrative organisations.² In the UK and in India, functional or purpose division of work is very common. The Ministries of Education, Transport, Postal Services and the Railways in the Central Government of India have been formed on purpose basis. Purpose principle is recognised in Soviet Union by vertically organised branches such as agriculture, education or defence. But a state committee often cuts across several branches. In France also the administrative departments are created on the basis of purpose. All these departments have clearly defined administrative functions and a considerable administrative network. Examples of purpose-based administrative organisations are the field of justice, foreign affairs, interior, industry, agriculture, etc. It is very difficult to describe the allocation of other government functions because of the continuous changes that are being made. The basic problem with using purpose as a basis in all these governments is the difficulty in ascertaining the purpose of a particular programme.³

2. Process

In this base of administrative organisation it can bring together in a single department all of those who are at work making use of a given skill or are members of a given profession. It is more or less a specialist organisation. It is noted for its professionalism. No department in British government is generally organised on the process principle. In India, process principle is used for many functions of the government such as the department. At the local

government level in France, government, officials such as engineers, architects and valuers are appointed. Specialised organisations under US presidential control are on the increase these days like the Economic Council, National Housing and Education, etc.⁴

3. Persons

Organisation is based on either persons or things with which the organisation deals. It is exclusively responsible for some section of the population. It is believed that this kind of administrative organisation may lead to the benefit of a single powerful interest group. In India, the Department of Rehabilitation at the centre and the Department of Tribal Welfare in some states have been formed on this principle. American examples are the Bureau of Indian Affairs, the Veterans Administration and the Children's Bureau. In UK, there are few administrative organisations based on this principle.

An attempt to create a separate pension department for widows of police servants was made and later dropped. The Ministry of Repatriation which was created to solve the problems of the Algerians in France was based on clientele principle. It had regional offices at Paris, Bordeaux, Lyons, Marseilles and Toulouse. Later it was attached to the Department of Interior.⁵

4. Place

Government organisation extended its service towards the length and breadth of a country. As a basis for government organisation, geographic based organisation has advantages and disadvantages similar to clientele-based organisation. Generally, it facilitates access for the people even in the, remote corner of the country and it can be more responsive to local needs. Almost every modern governments whether parliament or presidential, democratic or non-democratic, larger or smaller have followed area principle.⁶

It should be understood that creation of administrative organisation on these four bases is impracticable. One can witness all the four bases in one administrative organisation. For example, the Department of Education based on purpose

principle may cater to specific needs of a particular section of the population. Then it becomes clientele organisation. By the way in which the benefit of research work may be useful for other organisations existence or development, it becomes process. When the Department of Education has its field offices apart from the headquarters then it assumes area or geographical principle.⁷ In short, in modern governmental organisations the characteristic features of all the four bases are there and therefore it can be rightly called a 'Hybrid Organisation'. A strict demarcation of administrative organisation on the basis of bases is something impracticable. Simon was particularly critical of these four bases and referred to it as "four proverbs" of classical theory of public administration. However, these bases provide some guidance as to how to maximise achievement of particular goals in public organisation structure.⁸

Every government organisation is modelled as a paramedical shape. The chief executive of the country occupies the apex of the pyramid-shaped administrative structure. However, the chief executive takes part only in the most important aspects of decision-making while leaving a great share of his duties and responsibilities to his subordinates. Besides, the chief executive is also incharge of general supervision, control and co-ordination of the administrative work. The chief executive of a country is helped by three important agencies such as Line, Staff and Auxiliary. The terms 'Line', 'Staff' and 'Auxiliary' are found in management literature in discussions of matters such as 'Line Authority', staff responsibility, and 'auxillary' service. They indicate aspects of organisational positions, line refers to a relationship of direct authority characterised by an organisational head having responsibility for a subordinate activities. Staff refers to the relationship with line authority and they assist the line agency in their endeavour. They facilitate the organisational activities of a line authority.⁹

If we consider line and staff relationship in detail it becomes evident that there is involved, the most fundamental type of authority based on the 'scalar' principle of a chain of command running vertically through the organisation, with subordinates

reporting directly to immediate supervisors from whom they receive direct orders.¹⁰ The chain is constructed in accordance with the principle of 'unity of command' whereby organisation is based on an uninterrupted series of steps in authority. Each person below the chief executive is accountable to someone else for the execution of instructions. Thus, line authority (starting from chief executive) is in effect, the continuing exercise of the right to decide, direct, give orders and insistence on the implementation of decisions.

1. Line Agency

In modern public organisation, the major functions of the line include:

1. provision of points, of reference for decisions within the organisational structure,
2. establishing official and authentic lines of communication, and
3. the creation of means of control.

Specific tasks of line agency may include: training, direction and control of subordinates, delegation of authority and responsibility, decision-making and use of sanctions wherever necessary.

2. Staff Agency

Staff agency has been characterised as including all elements of an organisation not classified as line. The nature of staff is essentially that of advice to the line agency. Staff assist, advise, investigate, recommend, solve specific problems, provide ideas derived from their expertise and generally facilitate the movement towards organisational goal.¹¹ Allen describes the relationship between line and staff as follows:

1. Functions designated as line must carry authority for final decisions related to the goal of the organisation,
2. Staff should have no authority over line or other staff functions except by express delegation from the top.
3. Staff should offer advice without being specifically invited to do so.

4. All offers of advice staff should be considered by line.
5. Line authority may accept, reject or modify advice from staff.
6. Where there is disagreement, line and staff should have their light to appeal to higher line authority.

The comments of Dimock on line and staff powers and position is noteworthy. He says "Generally speaking line connotes action, staff, advice. Line is hierarchical, staff is collateral, line is authority, staff influence." A bureau chief is line official, his research assistant is a staff officer. According to Piffner, "there are three kinds of staff services, general staff, technical staff, and auxillary." The general staff helps the chief with some of the management functions that cannot be delegated to line subordinates *e.g.*, advice, research, shifting important business. In fact, the staff reduce the burden of the chief executive by deciding things in less important matters. For chief executive, only the most important matters reach him for decision. Such relationship between line and staff will make the staff to become departmentalised, co-ordinating the advice given by those advising the chief on different issues.¹² They also consolidate various demands and present a practical recommendation within the framework of administrative rules and procedures. In the long run, the staff agencies will become specialists in their own field such as accounting, purchasing, auditing, personnel and business. The line agency is further helped by the staff on technical matters.

3. Auxiliary Agency

The third kind of agency identified by the management science is the auxiliary agency. They perform certain incidental functions which are common to various administrative departments. For example, an auxiliary agency extends the services like stationary, recruiting personnel, accounting, purchase, supply, storage, etc.¹³ According to Willoughby auxiliary agencies are mainly concerned with housekeeping activities. There is no direct link between the members of auxiliary agencies and the general public. Both staff and auxiliary agencies are helping the line

agencies in reaching its objectives or goals. In most of the cases the staff agencies are under the direct control of the line and placed within the organisation itself. But in case of auxiliary, they are indirectly controlled and quite often placed outside the purview of the organisation to which it is rendering its service. The other difference between staff and auxiliary are as follows:

1. Staff are to extend advisory services, while auxiliary perform or facilitate services.
2. Staff assist the chief executive and auxiliary the line organisation.
3. Staff branches off from the chief executive while auxiliary branches off from departments.
4. Staff is concerned with the formulation of major policies while auxiliary extends its service incidental to that.
5. Staff are concerned with general improvement of the goal reaching task of the department while auxiliary intend to see the maintenance of the department.

According to Peter Self staff concepts have provided a rationale for strengthening the instruments of control and co-ordination, and for lightening up the administrative framework. Though the distinction of line, staff and auxiliary agencies are more important to private enterprises, its distinction in modern governments quite often "overflows" due to various internal and external pressures. Besides, line, staff and auxiliary agencies are primarily management concepts basically aimed to foresee the future.¹⁴ It is a forward-looking concept and thus its importance in government is overlooked sometimes. However, in modern democratic governments the staff function is to assist the chief executive, and the line agency who work under chief executive, perpetuate the command. The staff and the auxiliary agencies assist directly and indirectly respectively. One should also note that there are many intermediate positions between the executive and the staff agencies. Certain executives, sometimes ignore the advisory role of the staff and will have personalised advisers. Thus the view-point of the chief executive is one variant factor affecting the traditional role assigned to staff and the line chief executive's major concern is not future

politics or future decisions but a solution to the present problem. Most of the chief executive decisions are *ad-hoc* and do not have a long perspective policy orientation. Today, the chief executive receives most of his personal advice only from his political sympathisers rather than from any other quarters of administrative organisation. Only routinised tasks of planning, reporting, budgeting, etc., are handled by civil servants who work in effect through line control.¹⁵

Broadly, line agencies in government are represented by departments, public corporations and commissions. A department is the fundamental organisation unit of administration through which governmental operations are carried out. A department is the highest organisational unit of administration, which functions below the chief executive. The formation of a department is vested in the parliament, or with the executive and the constitution.

In the USA, it is the congress (parliament) which regulates the formation and dissolution of departments. The American president is not free to recognise the executive branches of the government. On the contrary, the British Executive does not face such problems as in the USA. The ministers of the crown (Transfer of Functions Act, 1948) conferred such powers on the British Executive. In India, the formation and dissolution of ministers and departments is an executive function, whereas in the USSR there was constitutional sanction behind the ministries which could be abolished only after an amendment to the constitution. The basic unit of administration in France is also a department under ministries. There are now fourteen well-established ministries.¹⁶ French departments under the control of ministers have a wide network of regional and local branches. These branches do not come under the effective control of the ministers.

In the departmental system of the UK, the USA, France and India related activities operating in the same general field are grouped together into departments maintaining this close relation with each other, and consequently, the line of authority runs from the service to the department, and from the department to the chief executive. Generally in the USA, the

USSR and France there has been a tendency to fix the number of departments while the number is not fixed in the UK and India. Due to the enlargement of governmental functions the UK and India opted not to fix the number of departments in concrete terms.¹⁷

The operative methods of Soviet administrative organs were based on the concepts of 'Edimnonchalie' or "One-man management" and collegiate management. There are two forms of organisation within the Soviet System, one governed by the boards and the other individually managed by the agencies. But in practice, every type of administrative organisation is, in fact, controlled and directed within the Soviet System.¹⁸ Operational freedom was very much limited to whatever type of organisation that might be. While in the USA, some departments are headed by individuals and some of the other departments are headed by the boards. There are thirteen regular line departments which have not been systematically created but have grown, one by one to meet new conditions. The departments in the USA are generally considered the most important and comprehensive administrative units. They enjoy the highest formal status. There are marked differences in their size and budgets.¹⁹

The structure of departmental organisation in France is complex in nature. Regarding the hierarchical ladder, it is not as rigid as that of the USA, the UK and India. It is very flexible to accommodate any directions that come from the ministers and the chief executive. French central government departments are not usually headed by a single permanent official only a few ministers have a permanent secretary as in Britain and India. The pattern of departmental structures vary from department to department. The general administrative structure of central administration is organised in the following manner.²⁰ The most common major unit is the directorate, but some ministers are divided into directorate generals, while others are divided into secretariat généraux. The last two are generally larger than the British division,

It may be noted that some departments are placed under the direct authority of the minister. It is claimed to be a part of the ministry but having distinctive features. For instance the

National Institute of Statistics is a part of the Ministry of Finance, but it is also a legally distinct public corporation. While in the UK and in India homogeneity is the guiding principle of central administration, it is not the case with France. In contrast, the USSR central administration is highly rigid and is controlled and directed by extra-constitutional forces like the Communist party. The French systems have experienced administrators turned politicians in the majority of the departmental organisations²¹.

The central organs of state administration of the USSR, the Union Republic and the Autonomous Republic are executive and administrative organ of the state power in the Council of Ministers of the Union and the Autonomous Republic. Central spectral organs of the state administration such as ministers and departments of the USSR and state committees of the council of ministers, regulate, co-ordinate and plan the activity of the state in the exercise of specified functions. The entire soviet administrative system conforms to monocratic model.²² It is purposefully built in such a way so that internal conflict within the administration can be kept at bay. Party bureaucracy operates parallel to and almost penetrates into the state bureaucracy. Its members become Apparatchiki. A Soviet apparatchiki can opt either for a career in the party apparatus or in the state bureaucracy. Confusion over political area and administrative area arises because the policy formulation and policy execution are not separate functions performed by separate agencies. In former Soviet Union a ministry, department or state committee was responsible for administration of a specific activity. It was also responsible both for its formulation and execution. They believed that communist ideologies could be effectively implemented if Communist party organisations and the administration units overlap. Likewise, in the USA there are two kinds of federal civil servants those in classified (competitive) positions and those in unclassified (expected) positions. Most of the top administrative posts are filled by political appointment. They are politically in sympathy with the programmes of the chief executive and personally loyal to the president. They will be the chief executives in the

policy formulation. Finally, they execute the laws under their jurisdiction in such a way so as to bring the most credit to the chief executive and his party and programme.²³

In India and in the UK in the higher echelons of the administration there is no patronage appointments which are considered to be necessary in the USA government. However, in India a slight tinge of patronage transfers of civil servants is apparent in many incidents of change in government. The question of patronage of political appointment is never considered to be a big deal in France. Since most of the politicians are erstwhile administrators and the present civil servant of France will become the future politicians leading some departments. In France, thus, the system of administration has naturally affected an organic link in the policy-making and policy operation area.²⁴ After the Second World War, France attempted to imitate the British system of semi-permanent cabinet committees to fulfil the function of co-ordinating policy but later dropped the design and the task was assigned to inter-ministerial co-ordination committee. Today in France, each ministry is headed by non-permanent secretaries who are directly responsible to the minister (except the Ministry of Foreign Affairs). Only the director of his cabinet becomes the *de facto* source of administrative coordination within the ministry. A peculiar situation in France is that of Article 23 of the Constitution which allows a person to become simultaneously both a member of the executive and the legislature. The minister of the French cabinet is responsible for the legislature like British parliamentarism.²⁵

In India which operates under the system of parliamentary democracy with ministerial responsibility to the representatives of the lower house, under Article 73 of the Constitution, the executive power of the union extends to all matters with respect to which parliament may make laws. All executive powers of the union are vested in the president which are exercised by him either directly or through officers subordinate to him accordance with the constitution. Officers subordinate to the president also include the ministers. In fact, the president is only a figure-head as the British monarch. The Council of Ministers functions

through a number of ministries and administrative departments. Like the British administrative system, a department is the basic organisation unit within the ministry. It is headed by an administrative head unlike the American departmental head, who is usually a political nominee by the USA president. At present there are 57 ministries and each ministry consisting of one or more departments of the government. The major concern of the department or the ministry lies in evolving public policy within the constitutional framework, its implementation and periodic review. Each ministry under its control has subsidiary organisations which are called attached and subordinate offices. A ministry is divided into division, divisions into branches, branches into sections.²⁶ A section under the charge of a section-officer consists of clerical staff *e.g.*, assistants, upper and lower division clerks, typists, diarists, etc. A branch which is normally under the charge of an under secretary consists of two sections. Two branches ordinarily constitute a division which is normally under the charge of a deputy secretary. Fig. 5.1 shows the organisations structure of the ministry.

The top management of the department is managed by members of Indian Civil Service, who belong to the All India Services and the Central Services. The middle management consists of the central secretariat service and officers of the subordinate and attached offices. The upper division clerk, lower division clerk and the assistant belong to the category of ministerial services.

The multiple roles assigned to an American president has led to several structural ambiguities in the USA. The American president, unlike his counterpart in the UK, India and France is chief of the state, head of the government and party leader. It creates inevitable role conflicts for the American Chief Executive. The inherent powers of the president clearly brought out in Article II, Section 3. "The executive power shall be vested in a president of the United States of America, and Article II, Section 3 which states that the president shall take care that the laws be faithfully executed." The staff agencies of the president have grown in numerous ways and the important staff agencies are described in the following paragraphs.

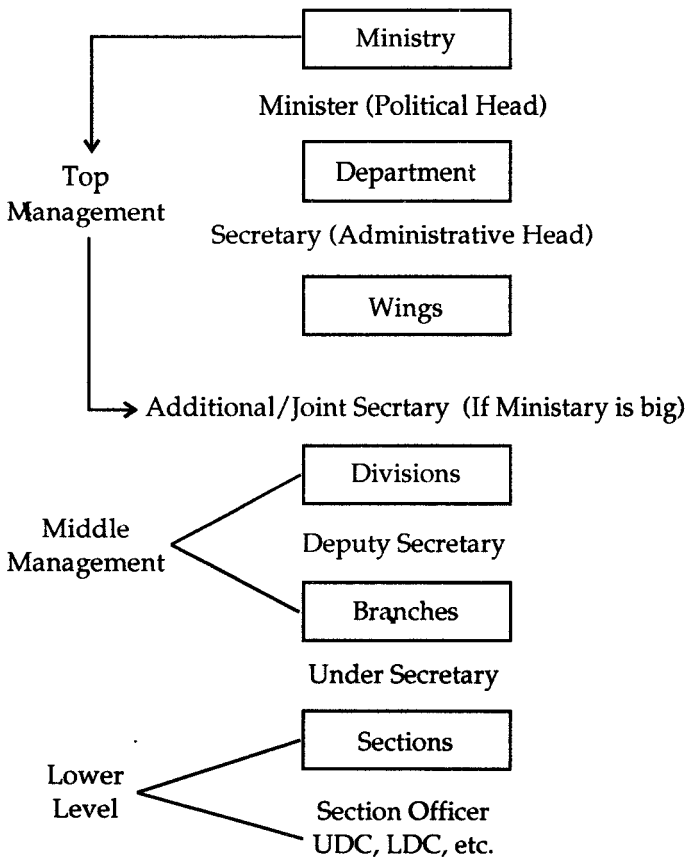


Fig. 5.1 Organisational structure of a ministry (India)

The executive office of the president was established in 1939. It dealt with the increasing number of matters requiring presidential attention. It came as a result of the recommendation by Brownlow report. The present executive office has four central units such as:

1. The Office Management and Budget (OMB),
2. The Domestic Council/Domestic Policy Staff,
3. The National Security Council, and
4. The White House Office (WHO).

The Office of Management and Budget

Before 1970 the office was known as Bureau of Budget. It helps to prepare the federal budget and suggests ways of improving the federal management. The director of OMB is appointed by the federal government. The director of OMB is appointed by the president with the advice and consent of the senate. The organisational structure of OMB is given in Fig. 5.2.

The Domestic Council Domestic Policy Staff

This was established in the year 1970 and its primary purpose is to co-ordinate domestic policy and develop integrated set of policy choices.

The organisational structure is presented in Figure 5.3.

The National Security Council

It was established in 1947 and it advises the president on the integration of domestic, foreign, and military policies. The council is composed of the president, vice-president and secretaries of state and defence. The chairman of the joint chiefs of state and the director of Central Intelligence Agency (CIA) serve as advisors to the council.

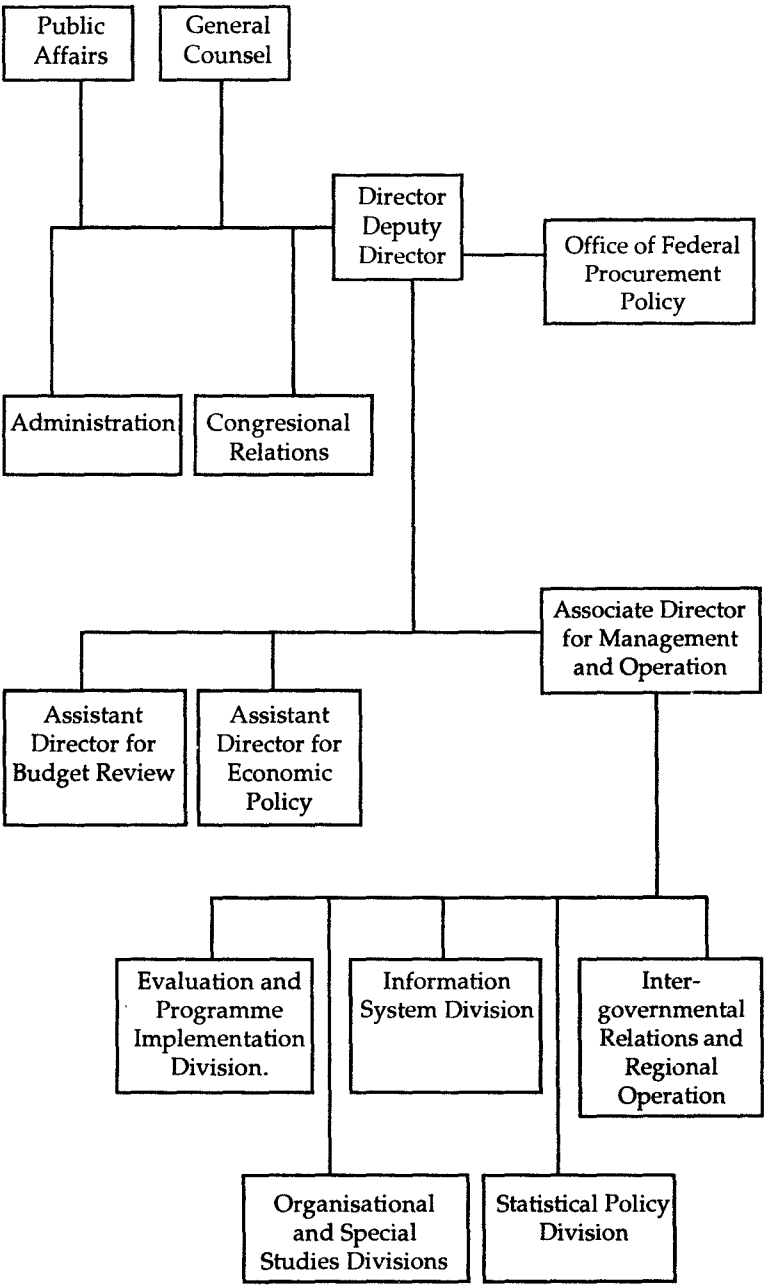
The White House

The White House staff assist the president in the performance of his routine duties. The White House analyses the problems of the president, and deals with appropriately. It conveys the decisions of the president to the various departments, deals with Congress party members and private groups etc.²⁷

The Council of Economic Advisers

Small groups of economists advise the president on important fiscal policies affecting the nation. The director of this council shall prepare president's annual economic report. It will also closely watch the economic growth of the country and pass the message to the president to take appropriate measures.

All the above said organisations play a vital role in advising the president. These staff agencies are ever growing in number



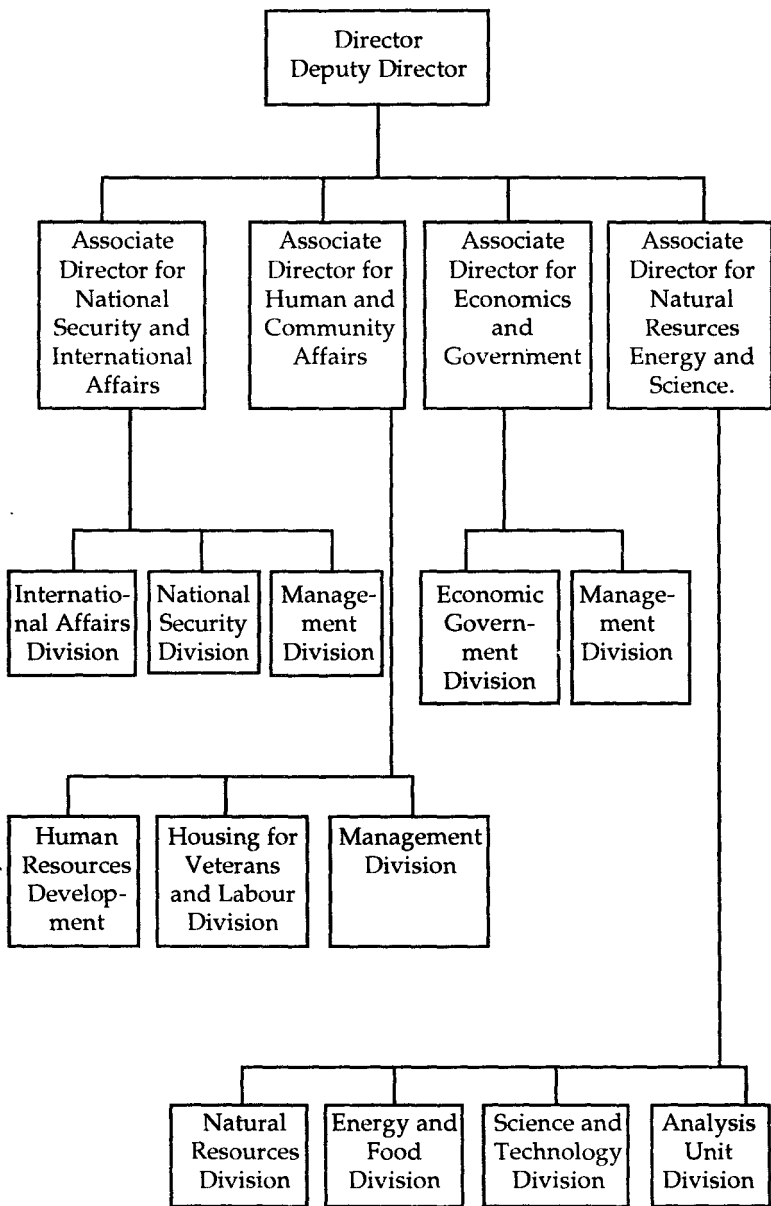


Fig. 5.2 The Office of Management and Budget (USA)

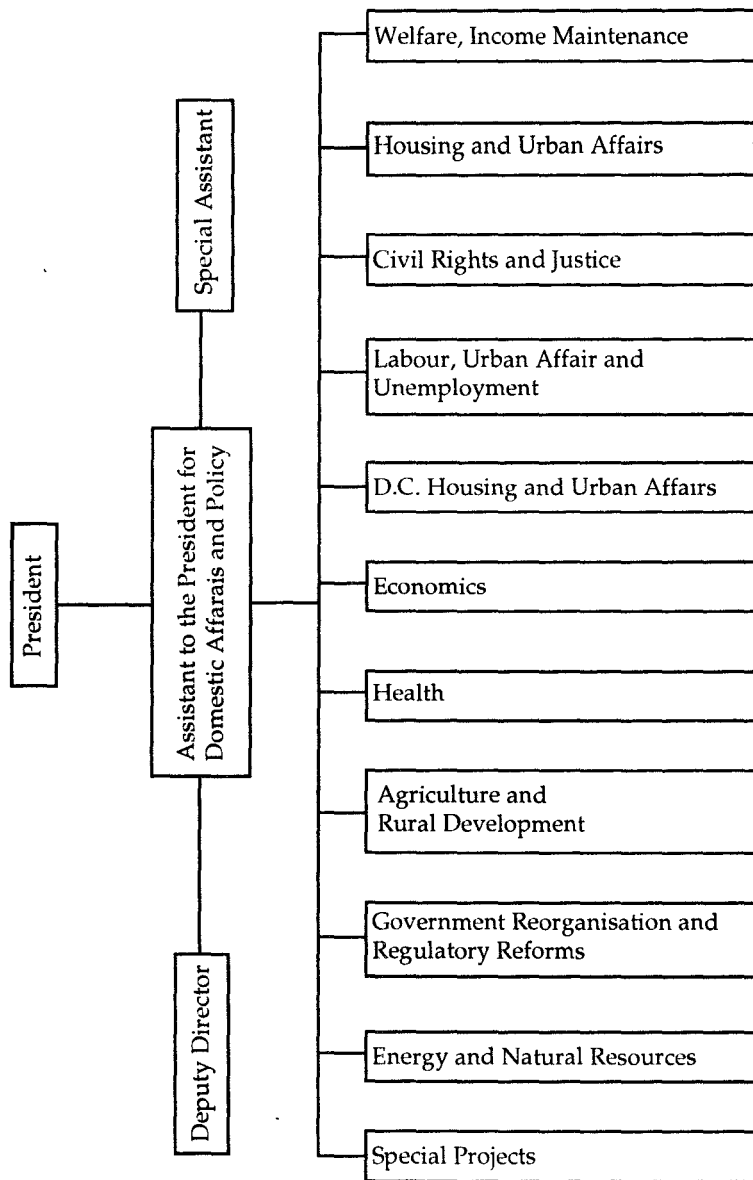


Fig. 5.3 The Organisational Structure of Domestic Council (USA).

and in their scope of power. It is this exceptional growth in American political system that worries the congress much.

Of course, as we have noted such outgrowth of presidential bureaucracy is part of the federal system. Despite a strong federal bureaucracy at the helm of affairs, the American president finds it more difficult to pursue 'national policies' than his counterparts in the UK, India, France and other European countries.

A striking difference between the USA and parliamentary system of government is that in parliamentary government the relation between the party and the members of the cabinet is much stronger and it is fainter in the USA. The president's cabinet is not a collegial body of peers or fellow party leaders. Besides, all the executive agencies since the recommendation of Brownlow Committee (1973) of Administrative Management are being absorbed into the presidentially supervised cabinet department. All the presidents of the USA have attempted to bring these various administrative units under centralised direction. There is a hierarchical control of administration by the president.²⁸ The major problems of American administration is that of ensuring the loyalty and co-operation of agency employees and of structuring their interactions with the president, his aides, the congress and the array of interest groups concerned with the agencies operation. Therefore, appointment and reorganisation of power the instruments of choice in the presidential attempt to control the bureaucracy.

However, in agencies and departments with standard executive functions the president's appointment powers are limited to the highest ranking positions. The federal national administrative structure is represented in the Fig. 5.4.

It is the departments and agencies which are responsible in assisting the president in shaping and implementing policies. There is a highly centralised direction by the Executive Office of the President (EOP) on the entire bureaucratic structure. The growth in a power and in number of EOP is much evident from Table 5.1.

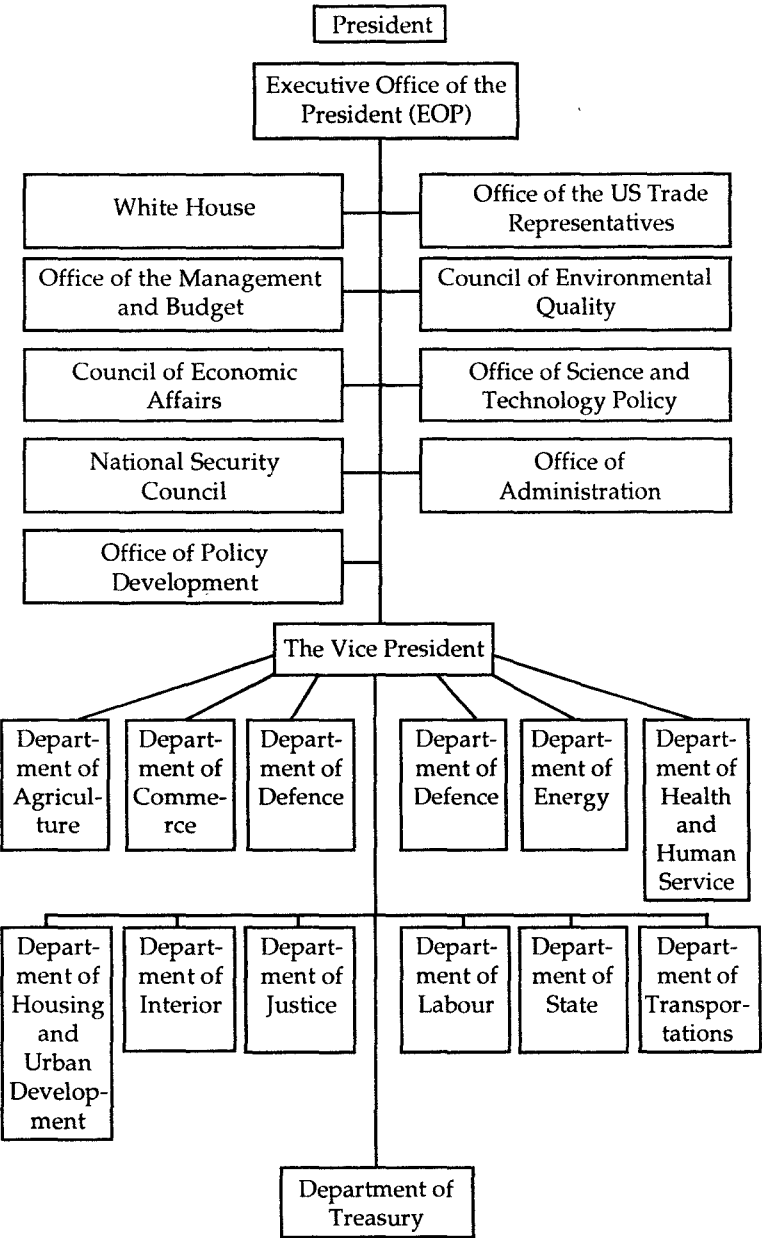


Fig. 5.4 Executive Branch of the United States

Table 5.1

Components of the Executive Office of the President

<i>Unit</i>	<i>Full-time positions</i>
White House	322
Office of the Management and Budget	594
Council of Economic Advisers	28
National Security Council	58
Office of Policy Development	45
Office of the US Trade Representative	130
Council on Environmental Quality	11
Office of Science and Technology Policy	15
Office of Administration	139
Office of the Vice-president	18

Source: Office of Management and Budget of the United States Government, Fiscal Year 1987, Appendix 1, SCI – C14, Office of the Federal Registrar, *the US Government Manual* 1985-86, pp. 78-80.

Administrative Structure: Territorial Dimension

For most of us public administration means the structure, function and scope of the machinery of central, state and local governments, the process of implementing political divisions and the administrative actors who process it. The scope of public administration is limited to these areas mentioned above, then we are only half way through in the study of administration of a country. According to Stanyer and Smith, the pattern of interactions and relationship between separate elements—the structure of the system—can never be studied properly from the view of only a small part with highly specialised characteristics. Therefore, it is important to recognise that the system of public administration is linked in a variety of ways with the rest of the government and with society as a whole. The structure of administration and the scope of its

relationship with political factors so far have referred only to one portion of the administrative staff of government—the central government administration. A further study of public administration rests with the territorial dimension of a country's administration and its relationship with the central administration.²⁹

There are various factors that govern decentralisation of an administrative system and extend the scope of public administration from its territorial functions. Geographical dispersion of population, social, economic and political factors are the major causes for varieties of public administrative institutions and its territorial decentralisation. For instance, in India, a complete picture of administration is possible only if we take into account the growing number of public sectors, autonomous bodies, quasi-government and quasi-judicial bodies.³⁰ Besides, it should also include the administration at the state and local levels. In a comparative study of administration one should understand. The criteria under which such geographical dispersion of administration and extending services under non-governmental or semi-governmental basis are taking place. The reasons are many and much depends on the socio-political complexity of individual nations.

In unitary system of government like the UK and France, there are only two levels of administration—one at the central level and the other at the local levels. In federal system like the USA, India and Soviet Union majority of the civil servants are recruited and controlled by the central and by state or provincial level. Apart from this, the local government has certain exclusive powers and functions as determined by the state or provincial governments. There are parallel structures, which operate at the central, state and local levels. In most of the cases like India, the central civil servants operating at the state level implement the policies of the central government. There are constitutional provisions to effect the division of functions between central and state governments. Mostly self-government functions are left to the local levels. Thus, federalism in the USA or quasi-federation as in India is an important factor for administrative decentralisation.³¹

In the USA, there are many important functions of administrative nature assigned to state and local levels, but the federal administrative structure itself is far from unified. The department that come under the control of Executive Office president (EOP) are responsible to the president.³² Besides some independent regulatory commissions such as the inter-state commerce commission and a host of other agencies and bureaux which have been created by act of Congress and which have separate, particular purposes are also responsible to the president. The main reasons for lack unity even in the USA at the federal level are:

1. The division of power between the president and legislature. In the USA, the Congress creates certain agencies and controls them more independently than that of the president, and
2. The appointments in the federal level departments are not given to career civil servants but to political appointees of the president.

These are the two major factors that influence the lack of unity between various departments, agencies and bureaux. As such in the USA a significant portion of officials are employed outside central ministries or in areas over which central or federal bodies exert a more or less powerful influence. Therefore, the American administrative structure at the federal level is noted for the problems of co-ordination and integration of various president controlled bodies and congress controlled bodies.³³

The Indian, British and French administrative structures are far more hierarchical and centralised than that of the the USA. Given the absence of a political service at the top and a more standardised system or recruitment, there is self-regulation within the administration. Departments in the UK, India and France are least independent from the control of the executive. In the UK and France regions are less important parts of administrative system than in India where there is a constitutional provision for administrative decentralisation. Even in France after 1986 there has been a move for greater decentralisation of administrative power. Both in India and the

UK, the most important functions (defence, currency and coinage, foreign affairs, atomic energy, science and technology, space and national planning, etc.) are the monopoly of the central government.³⁴ Most of the state and local government administered functions heavily depend on the grant-in-aid, loans and other assistance from the central government. This is one type of administrative control exercised by the central government over local administration in the UK and in India. Particularly in India (ex-colonial country) implementing the directive principles through preparation of national plans for economic and social development affected the powers of the state administration. The pace and volume of the work increased with central government direction. Not only new ministries and departments emerged in development field but the hierarchies of the central departments and their programmes reached down into the districts. The Indian civil service personnel recruited by the Union Public Service Commission (UPSC) is employed both central and state services. Central government personnel are there for the purpose of defence, postal service, railways, etc. and the state government personnel for regulating and controlling scarce commodities and implementing various development programmes initiated by the central government. The IAS (Indian Administrative Service formerly known as ICS) played a key role in maintaining a smooth relationship between centre and state in the field of administration since 1950. The existence of such a service in a federal system of democratic government has been remarkable feature. At present there are 29 states and 7 union territories.³⁵

The case with the nature of territorial dimension of administration in the USSR was totally different. The Soviet administrative structure was centralised, but the federal structure has some decentralisation. The Soviet Union was divided into 15 Union Republics, equivalent to the states of the USA and India. To accommodate the numerous distinct national grouping, which existed in the USSR within some of the Union Republics, there existed other subordinate units such as 20 Autonomous Republics, Autonomous Regions, and 10 National Areas. Most of these units were located in the Russian Republic

which covered half of the population of the USSR and three quarters of territorial area.³⁶

The 15 Union Republics had their own constitutions like that of 50 states in the USA. They also had a government and directly elected legislatures. There was a constitutional right to the Union Republic to secede from the Soviet Union. However, the formal structure of federal administrative organisation, in reality, operated as a highly centralised structure. The reason for such a centralised character of administration was:

1. The dominance and the pervasiveness of the communist party,
2. The operation of the ideological principle of democratic centralism,
3. The exercise of central political and administrative authority over subordinate units, and
4. The existence of a parallel bureaucracy in communist party.

There were four categories of Ministries/Departments in Soviet Russia which were as follows:

1. The all union ministries which existed at the USSR level and whose local branches and offices were directly subordinate to the centre,
2. The Union Republic ministries/departments, which existed at the USSR and the Union Republic level (certain ministries did not exist at all in Union Republic).
3. Republic ministries/departments which existed at the Union Republic level with no corresponding body at the USSR level; and
4. Autonomous Republican ministries/departments with no equivalent body at the Union Republic or USSR level.

These four types existed in descending order of the degree of central control.

As far as personnel of these four categories were concerned, there was no uniform system of recruitment. In general, each head of service had his own senior staff in conjunction with senior staffs recruited by appropriate party authority. At the

highest level, that of Union Ministry, for example, the minister was responsible for recruitment in co-operation with the department of the Central Party Secretariat in whose competence the particular ministry fell.

The constitutional framework for territorial expansion of administration was known from chapters V to VIII of the USSR constitution 1977. The Local Soviet existed in areas, regions, districts, towns and rural localities. In all they included in number a total of 1,820,000 deputies. Each Soviet elected an executive committee Ispolkom which formed the permanent administration for the particular administrative unit. They were treated officially as local agencies of the central government. In contrast to the UK, India, the USA and France, the functional and territorial expansion of administration was effectively controlled and checked by the Communist party machinery at appropriate levels and the overall control was exercised by the Supreme Soviet.³⁷ Further, the most significant difference of the Soviet administration was that Soviet bureaucracy also included industrial management, state and party administration. In the USSR, the party's over involvement in administration was criticised by many and considered to be the greatest weakness of public administration. The Nineteenth Communist Party Conference resolved in July 1988 to reduce the role of the party in administration and to increase the roles of state institutions, especially the Soviet. After the disintegration Soviet Union it is yet to be seen what kind of political administrative system they evolve on the basis of their past experiences.³⁸

France is noted for a highly centralised system of administration more so than British from the perspective of unitary type of government. Since 1964, various changes have been adopted to neutralise the highly centralised structure by means of decentralisation of powers. There are 96 'departments' which are grouped in 22 Regions, 320 Districts called Arrondissements, over 3,500 cantons and over 36,000 Communes.

While British and to some extent Indian ministries are fairly compact organisations located in London and in New Delhi respectively, the French ministries have a wide network of regional and local branches and a multitude of functional

agencies. Unlike its Britain and Indian counterparts, the organisational pattern of ministries in France varies from ministry to ministry. The designation of administrative units and to official posts vary even more. The central administration of France is organised in the following manner (Figure 5.5).

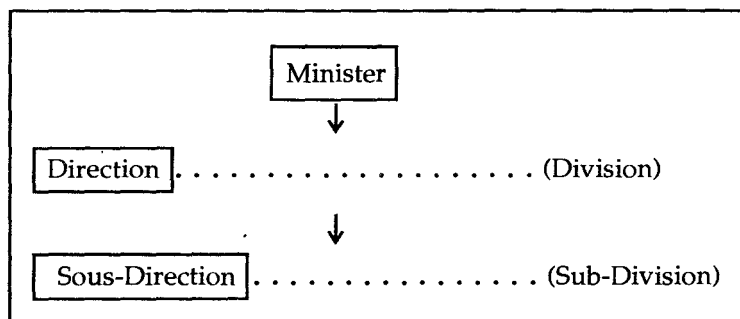


Fig. 5.5 Organisational Pattern of French Ministry.

The common unit of a division of the central ministry is the direction. Some ministries are divided into directions generates and some other as secretariats generaux. The counterpart of the French ministries direction is the division in India and in the UK. The directions are further divided into sub-division in sous-direction. Every division and sub-division is held responsible for the ministry to which it belongs. Below the level of directions and sous-direction, there is no uniform pattern of administrative organisation. In some, large ministries are usually further divided as bureau. The corresponding unit in India and Britain is the branch. There are also autonomous bodies which come under the direct authority of the minister known as bureaux.³⁹ On the whole, there is no homogeneity in the structure of administration at the central government level. Only in France, all teachers are central government employees. Among the countries of the USA, Britain and India, only in France more central government civil servants are employed. A comparative percentage of central, state and local government employees of the USA, the UK, Britain and India is given in Table 5.2.

Table 5.2
Central, State, District and Local Employees

	<i>(in Percentage)</i>			
	<i>India</i>	<i>USA</i>	<i>France</i>	<i>Britain</i>
1. Central/Federal	14	22	45	14
2. State and local	40	70	23	38
3. District	27	—	—	—
4. Local only	13	—	—	—
5. Others	6	8	32	48
	100	100	100	100

Others includes employees in public enterprises and other semi-governmental organisations.

In the USA local government organisations are the responsibility of the states and different states have different constitutions with regard to the organisation of local government. In 1977, the USA had a total of 79,863 local authorities including 3,042 counties, 18,863 municipalities, 16,822 townships, 15,174 school districts and 25,962 special districts. In Britain, the local system consists of counties countries, districts, London boroughs, the city of London, the Greater London Council, the Scottish regions, districts and islands. In India a committee on plan project under the chairmanship of Balwantrai Mehta submitted a report in 1957 recommending the establishment of rural local government with the help of three-tier system, the Village Panchayats as the basic grassroots institution, Panchayat Samiti at the block level, and Zilla Parishad at the district level. In urban areas, corporations, municipalities, notified areas and cantonment board. Urban population represents only 27 per cent in India. The recently passed 73rd Constitutional Amendment gave real powers for the local self-government in India. There are 22,50,000 panchayat raj institutions which represent nearly 5,78,000 villages of India.⁴⁰ The panchayat raj structure before the 73rd Amendment had some structural deficiencies such as:

1. The three-tier system led to the regimentation in local government which can only be relevant in a country following the Soviet system of local administration.
2. Its dependence on the field of administration which permanently subordinates local government to the state bureaucracy.

In India after independence the colonial structure of central and state administration was never changed drastically. In post-independent India, the Indian administrative service replaced the function of ICS (a British colonial legacy). Its authorised strength was 3,203 on 1st January 1971 which increased to 5,047 by 1st January 1984. The total number of civil personnel under central government rose from 17.57 lakhs in 1956 to 37.87 lakhs as on 1st January 1984. The total number of state personnel in 1984 was 63.3 lakhs⁴¹.

At the central level, secretaries of the ministries and departments of the government constitute its headquarter organisation. The number of secretariat department was 18 in 1947, 25 in 1957, 51 in 1971 and 71 in 1985. As in the United Kingdom, the administrative hierarchy of the central government, the secretary occupies a key position and he is at the helm of the affairs of policy-making. The central secretariat of the central government was manned by 878 officers of the rank of deputy secretary and above in 1984. A similar organisation exists at the state level, but one unique feature of India is that centrally recruited people also serve in state and Union Territories. Every state in India is divided into districts for administrative purpose and at present there are more than 500 districts.⁴² Thus, the basic territorial unit of public administration in India is the district. The District Collector belongs to the general administration department of the state government. He is the administrative head of the district controlled by the chief secretary of the respective states. The district collectors are normally the IAS officers, but it also accommodates 'promotees' from the state civil services. The districts are further divided into a number of units known as 'Revenue Divisions.' Each such unit falls under the charge of a

Revenue Divisional Officer (RDO). The revenue sub-division comprises one to five Tahsils which is headed by a Tahsildar. He is the principal official in the district administration responsible for revenue collection. The final unit of administration is at the village level.⁴³ Thus, the general administrative hierarchy in India is shown in Figure 5.6.

Besides these pure governmental organisations, there are also other types of organisations like public corporations, public enterprises and independent regulatory commissions both at the central and state government level. The control of these organisations is similar to those in the USA. There are overlapping functions among the different governmental organisations due to increase in number with the expansion of governmental functions in both the countries.

The comparative study of administrative structure of central, state and local levels present a very complex pattern. However, it is observed that modern bureaucratic organisation is based upon one of the fundamental principles of division of labour. Under no circumstances could any of the administrative system of each of the five politics examined in the study be classified as simple in structure.⁴⁴ The USA administrative system is the most complex administration. This is evident from the organisational diversity and uniqueness. America is a fertile ground for the emergence of new types of organisations, public corporations and other presidential executive agencies. There exist identifiable criteria to differentiate various administrative organisations such as executive departments, executive office of the president, wide independent regulatory agencies, foundations, institutes and institutions, claim commissions, regulatory agencies, government corporations, inter-agency boards, statutory advisory boards, Joint-executive Congressional Commission, inter-governmental (joint federal state) organisations, etc. American experiences when compared with the other democratic countries clearly show that the federal government withstands every kind of pressure due to the application of varied organisational principles in the federal administration.⁴⁵

Britain also presents a complex organisational situation. According to Barker, the British administration is complex

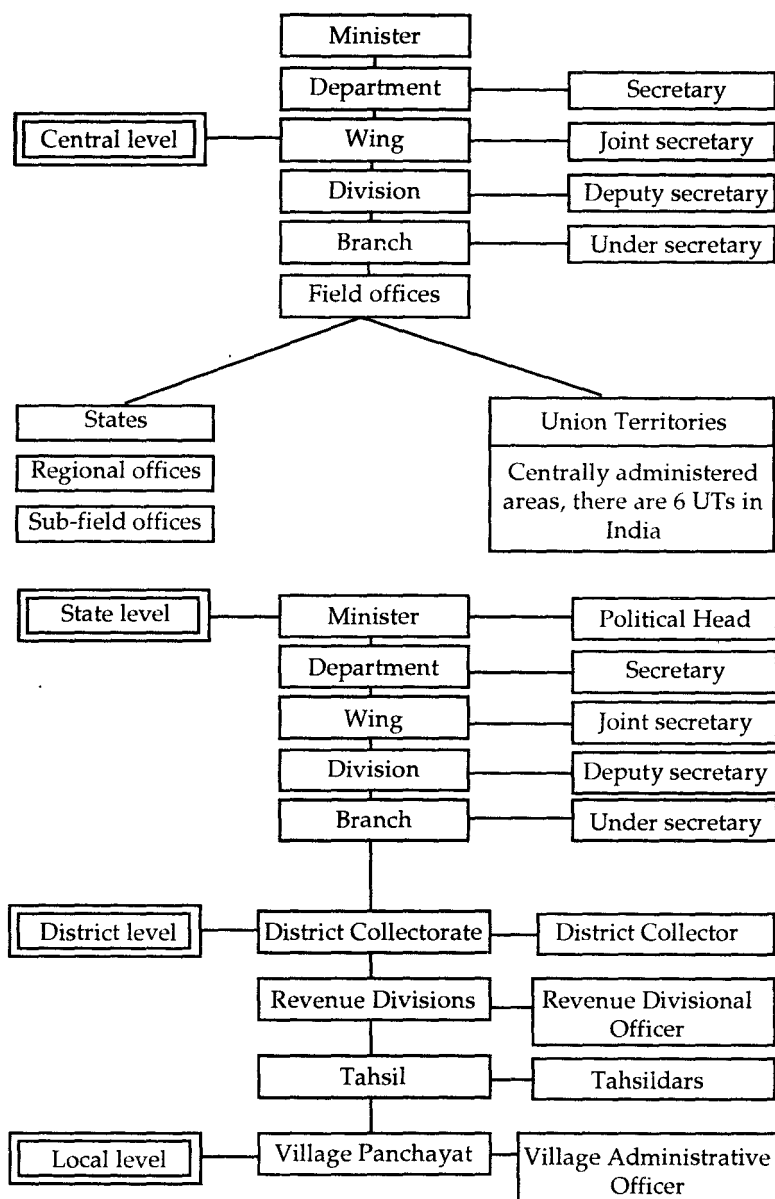


Fig. 5.6 Administrative hierarchy in the Centre, State, District and Local Levels (India)

because there are a variety of different non-departmental organisations, so called 'guangos'. The expansion of governmental activities under the concept of 'welfare state' encouraged the central government to create non-departmental type of organisation. In India, the vastness of its area and the need for rapid socio-economic development forced her to form certain new types of organisation unknown during the colonial administration. Soviet administration presents a gloomy picture about the distinctive nature of civil administration.⁴⁶ On the whole the various administrative units which were created acted just as a substitute or agency of the communist party.

France also presents a different pattern of complexity in its organisational type and structure. More than area principle it is the functional principle which guides the more hierarchical and centralised French administrative system. The political system of France is unitary and thus allowed for a centralised administrative system. Soviet administrative structure was also centralised, but the federal structure allowed a certain degree of decentralisation.

It is understood from our study that there exists a close nexus or relation between a country's political system and its administrative structure. It is important to understand the nature of administration from the study of political system. No doubt, there are other factors such as political parties, interest groups, voters, press and modern electronic media which greatly influence the public policies processed by political system.⁴⁷ In this context, the most important influential factor as far as policy areas are concerned is the bureaucracy. It is the body entrusted with carrying out decisions and thus has a particular importance in policy-making in any political system. There are certain comments that the administrative apparatus actually operates the machinery of government. For example, the French people will not worry much about the fall of government since most of their objectives get fulfilled by administration rather than by the government. Thus, a strong administrative policy or practice in France is a factor of stability for the government.

Even in India, political weakness at the central and state level is quite often compensated by the wide network of

administration. However, many critics have pointed out that increasing bureaucratisation diminishes the chances of exercising democratic political control. The development of the bureaucracy within a democratic framework can only be studied from observing the realities of political administrative situation. There are various devices adopted by countries to effectively control the emergence of a 'Bureaucratic Government' which is an anti-thesis of modern democratic concept. The constitution, nature of polity, role of legislative and executive control are some of the important factors required to understand the nature of administration. In the analysis of political system, the David Easton model showed the existing differences and similarities of a political system. Now, it is a well-established rule that policy-making is predominantly and legitimately the role meant for the politicians and the policy implementation role is that of the administrators.⁴⁸ But the line of distinction between policies and administration is not only blurred but quite often overlaps in the countries we have studied.

However, it is clear that the best comparative perspective in policy-making role of politicians (political system) and policy implementation role of administrative system. Having this as a paradigm we have demonstrated that such distinctions cannot be made in modern administrative state, because the traditional notion of bureaucracy is slowly changing in tune with a changing socio-political and economic situation. From our study it is self-evident that in the field of policy-making almost all the countries, bureaucrats in varying degrees, followed political superiority over bureaucracy.⁴⁹ In any excessive role or prominence of administration is found, it is due to an expanded concept of 'Welfarism'. Thus, the administrative system and the political system mutually reinforce each other. The nature of administration differs in these countries because political systems differ. Further, the relationship configuration of a complex type sharpens the differences between legislature and executive which determine the similarities and dissimilarities. Adding to this, the territorial dimension is another important factor to answer the question why a certain administration is centralised and certain others are decentralised. Of the countries

we have compared Soviet Russia was characterised by distinctive features. Even there, administrative system was used as a means to realise the political, social and economic objective of Marxian-Lenin ideology.

In the field of local government and administration we have studied different types and features. Almost in all the countries we have studied, it clearly shows that local governments require central/state governments statutes and finance to be able to provide local services. Britain offered wide ranging powers, functions and board discretion to local governments. Though there is a constitutional provision for democratic decentralisation in India through the establishment of local governments, experiences show that the centre and the states paid lukewarm response to local governments. In the USSR, local governments were mere political party, machineries and acted as a cushion for future politicians and civil administrators.⁵⁰

So, we conclude our study of administrative structure in these five countries on the following perspectives:

1. Unitary vs. federal government;
2. Policy-making vs. policy implementation role,
3. Territorial dimension,
4. Parliamentary vs. presidential,
5. Political vs. non-political.

If one uses these major comparative framework, one may infer the following as the nature of administrative system:

1. USA—Lacks integrative mechanism found in the UK and India,
2. UK—Highly co-ordinated centralised administrative system with a tendency to demarcate the line between policy-making and policy application.
3. India—Inherited colonial, co-ordinated and to a certain extent centralised administrative structure and the line of demarcation between policy area and administrative area much depends on the political stability factor.
4. France—Very distinctive, centralised and tailored to suit the political instability factor.

5. Russia—Administrative system which was constitutionally decentralised and co-ordinated system but which acted as and of communist political party.

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6

Civil Services— A Comparative Approach

Introduction

This chapter is devoted to the comparison of civil services/servants who assist the government in day-to-day affairs of various executive functions. As noted earlier, the government acts only as an agency of the state in carrying out the orders of the state. What constitutes a civil service? There is no universally accepted explanation. For instance, in India and the United Kingdom, there is no legal definition for civil servants.¹ Strikingly in France, college professors and school teachers are included in the civil servants list. The former Soviet Union presented the most peculiar example. In the USSR, both the party and state organisations possessed administrative staff, concerned with executive functions related to government. In India and the USA there are many field services wherein civil servants are appointed to take care of administration on behalf of the central or federal government. Besides the USA, India and the USSR have provincial or state civil services because of their structures as federal states. In all these countries (USSR was to some extent an exception) there are independent or quasi-independent governmental agencies such as civil service commissions (UK)

Ecole Nationale Administration (France), Executive Personnel Department (USA), Union Public Service Commission (India), and departmental recruiting agencies (USSR) for the purpose of recruiting civil servants. Federal countries like the USA and India have state-level recruiting agencies normally controlled and directed by national as well as state executives. Though there are some uniform pattern of establishing the civil service system in these countries, there are also significant differences among them in terms of recruitment, conditions of services, etc.² This chapter is largely confined to the national level civil service. Occasional references are also, provided in case of federal units in India, USA and Soviet Union. Let us first define the general meaning of civil service.

Meaning of Civil Service

What is civil service? Traditionally in political science subject, there has been no distinction between policy-making and implementing. The two major functions assigned to the government are rule making and rule application. It is also customary to distinguish between different roles of the political executives and the professional administration. The political executives are amateur administrators and the professional administrators are civil servants. Further in democratic countries the political executive is answerable to the parliament directly and the civil servants, through several hierarchies as indirectly answerable to their political executives. The political executives are not permanent elements of the government while the civil servants are. However, the dividing line between politicians and the civil servants is not clear.³ It is impossible to see top civil servants without any degree of policy initiative especially given the increasing complexity and scope of the policy-making process in modern 'welfare states'. Thus, in short, we can define the term civil service to these members of the executive staffs of ministerial departments and local level who occupy responsible positions in relation to the formulation and execution of the government policy. The civil service system provides a degree of continuity from government to government. No doubt, in most of the countries, the civil service positions are regarded as

‘political’ where the occupants will change, as governments change.⁴ But it varies in degrees indifferent countries. In India, the UK, the USA it is less, in France it is moderate and in the Soviet Union it was the extreme case wherein the civil service was highly political. Despite these political connections of civil service system there are certain significant features which are as follows:

1. Generally civil services are regarded as politically neutral,
2. The basic function of the civil service in all modern states is to assist the political executive to conduct the affairs of the government.
3. A general code of discipline and harmony exists in the work place,
4. Permanency of the post held by the civil servants,
5. The work of the civil government is mostly governed by written procedures and rules,
6. They are trained for general and specialised tasks set by the government,
7. They enjoy certain privileges compared to the ordinary citizens.
8. They are holders of administrative powers but subservient to their political masters.
9. Civil servants are usually referred to those persons who are occupying the top administrative post rather than the subordinate or clerical level employees.
10. There are certain professional ethics which should be followed by the civil servants.

It is only from these major paradigms that a meaningful comparison can be made. The variance in the civil service system arises because they evolved from various historical political settings. Further, they are continuously changing and the change agents are different in different countries. Thus, time is an important factor in analysing the features of civil services. Administrative reforms and modern public demands further erode the static nature of civil service.⁵ Internally, the organisational aspects of civil service affect the performance of governments

and the output they produce. However, the principal structural features of civil services even today stand to make a reasonable comparison.

Sources of Civil Service

During the early years of nineteenth century in Europe well-established civil service organisations were developed by Napoleon. The political and economic philosophy Jeremy Bentham expanded the need for wide governmental activities. There were historical landmarks which rejuvenated and revitalised the Civil Service system in different countries in different ways. Trevelyn has transformed the British Civil Service (1854). It was mainly concerned with the reconciliation of intellectual qualities with loyalty, integrity and discretion. The Haldne Committee of 1918 was concerned with the question of about how an administrator should reflect and think in the context of First World War reconstruction process.⁶ The Victorian model of civil service system survived virtually unscathed in the post 1945 era of welfare state and regulated the British economy also. The British Civil Service was further expanded and diversified during the Second World War and successfully met the challenges of that crucial time. However, the basic inputs into civil services in the UK remained the same which was formulated by Northcote-Trevelyn reforms. The recent structural reforms in British Civil Service was largely inflicted by the recommendations of the Fulton Report (1968). According to Nevil Johnson, the civil service since 1979 has been radically changed by imposing strong managerial view of civil service functions. Of late, the Management Consultancy Group's report offered the best and most radical re-assessment of the scope and purpose of civil services in the central government and the qualities they require.⁷ During 1988, Sir Robin's Report emphasised the need for greater accountability and responsibility of the civil servants with regard to budget proposal, policies and the increase of managerial efficiency. Therefore, the civil service in the UK at present has been gradually evolved from a traditional pattern to a modern managerial orientation.

The American experiences in relation to civil service development is quite in contrast with the British evolution. The civil service in the USA was first initiated to increase the efficiency of public service towards nurturing the federal policy and to strengthen the powers of presidential executive. The Civil Service System in the USA was created in the year 1883. Intellectual development and innovation in public administration has been largely a product of American experiences. Interest in the machinery of administration took a firm root in 1887 after the publication of Woodrow Wilson's article in the *Political Science Quarterly* entitled "The study of public administration."⁸ The Institute for Government Research in Washington established in 1927 promoted the scientific study of government in order to discover principles which could lead to its improvement. The influence of scientific management movement by F.W. Taylor had a great impact on American Civil Service. However, a great number of changes in the structure of federal state and local governments were initiated by the First Hoover Commission (1937) and the Second Hoover Commission (1949). The First Hoover Commission suggested the creation of separate staff agencies for the co-ordination of federal grant-in-aid, centre-field relationship, methods of overseas administration and the selection of public work projects. Managerial efficiency was firmly supported by the Second Hoover Commission. But these reports were not very specific about civil service reforms.⁹ The civil reforms initiated by President Carter constitutes the first major overhaul of the Civil Services. Since the system was created in 1883 Jimmy Carter proposed the Civil Service reform package of fulfil has promise of a government that was efficient, open and truly working for its citizens with understanding and respect.

While members of civil service are recruited by the open competition which is generally open to the society at large as it is practised in the USA, the UK, and India, the French system is somewhat different. The French Civil Service has been organised on the basis of 'corps' categories of staff which form the groups into which recruitment occurs. Members of the 'Grands Corps' (senior administrators) are recruited from the graduates of

specialist, competitive-entry training schools founded by the state. It has been claimed that among all the countries civil service system, the one which is practised in France, is the most efficient. Not only its organisation, but the history and tradition of France are responsible for its significance. Modern outlook and reform zeal appeared in French Civil Service during the reign of Fourth Republic. In the nineteenth century conditions of service in some corps were highly regulated. As far as specific codes for civil servants are concerned it is left to the individual ministries and the general code, even today, is prescribed by the council.¹⁰ The political instability factors were the major cause for initiating Civil Service reforms. Codifications of laws for civil service took place during the Vichy government in 1941. A general charter of Civil Service was drafted in the year 1946. The present Civil Service System in France is mainly governed by the new constitution which was promulgated in the year 1959. Even in the present codification it retains most of the basic laws of 1946. By taking some cues from the British administration, the French government established a civil service division in 1945. Its parallel body in India is Personnel and Administration Reform Ministry, in the UK the Ministry of Treasury and in the USA the Department of Personnel Management (1978). In these countries they are placed directly under the control of the chief executive (real). Thus, the prime minister of India, France and the UK are directly responsible for the management of the Civil Service. In the USSR it was the party at appropriate levels which exercised control over the Civil Service. The situation concerning the civil service in the USSR was complicated both by the existence of parallel bureaucracy in Communist party and the oversight of state functions.¹¹ The power of 'nomenklatura' was exercised by the party by its supervision of the appointments. The posts which were all sensitive or important were broadly termed as civil service in the USSR. But we may also take into account the other services which were once effectively controlled by the state such as the mass media, education, industrial production and even the military. Unlike the practice of Civil Service in democratic countries Soviet Civil Service was a distinctive class of its own. Civil Service in the USSR was classified in three broad senses:

1. It was a form of administrative management,
2. It was a social group functionary, and
3. It was a group of political elite (technical and non-technical) who ruled.

Soviet Civil Service was a byproduct of Bolshevik revolution. It was primarily shaped to meet the political-economic ideals of Marx and Lenin. It was developed mainly to neutralise the ill-effects of market forces of capitalism. Market regulation was replaced by attempts at the direct administration of economic life. The Bolsheviks under Lenin came to power with the promise of replacing the existing centralised state power structure based on civil bureaucracy and military—with newly based “armed workers.” Thus central civil service in Soviet Union unlike the USA, the UK, India and France was primarily related to the management of the level and the varied modes of production in the light of the social priorities at a given point of time. Civil service in Marxist-Leninist conception was an organ of political coercion in a class society. Even in democratic countries like France, India, the USA and the UK civil service has been used as an instrument of economic level playing.¹² Civil Service makes inroads in the business activities of the government like formation of numerous public corporations and public enterprises. They are much closer to the Soviet model of civil service economy, *viz.*, regulations. Regulation and indirect control by the civil service rather than direct ownership and administration are the rule in India, the UK, the USA and France. But there is no direct involvement of party politics in such interventions.

As noted in the preceding chapter, the method of recruitment in the former Soviet Union was highly centralised and it was also an extremely ‘political civil system’. Like in the USA the civil service in Soviet Union was largely drawn from the specialist groups, but the specialists were compelled to join the Communist party to become the privileged members of the *nomenklatura*. Such political compulsion is absent in the USA, India, the UK and France. However, an indirect loyalty or commitment towards ruling party policy programmes are some

of the major political criteria for the selection of civil servants to the top posts. Interestingly the USA top civil service post is almost similar to the practice of Soviet Union in the area of appointment and their dismissal.¹³

The Marxist-Leninist conception of civil service system was almost retained up to 1988. If at all there was any change in the style and functioning of the civil service, it was largely due to the personality factor of the Communist party leader. But drastic reforms in civil service system was made during the period of Mikhail Gorbachev, when he became the general secretary of the central committee of the communist party of the Soviet Union (CPSU). Thus, in the former USSR the party's over involvement in administration was identified as a major problem.

India has been in the transitional stage of development since its independence (1947). It engaged in the task of bringing about fundamental changes in the values, structures and the process of civil service. According to Riggs a phenomenon of the utmost significance in transitional societies "is the lack of balance between political policy-making institutions and bureaucratic policy implementing structures." Despite independence of India, we have deliberately inherited the colonial civil service system. During the British rule in India, the colonial administration was less concerned with development and change. They were more concerned with revenue collection, law and order problems. However, since independence several efforts have been made towards administrative modernisation in India starting from the Ayyangar Committee Report on the machinery of government in 1949, Gorwall Committee in 1951 and Paul Appleby Report (1953).¹⁴ They gave reports based on their survey of public administration in India.

But the greatest thrust on administration reforms at the national level came with the appointment of the Administrative Reforms Commission in 1966. It brought out 22 reports with over 500 recommendations. The commission was given a very wide power with the task of "giving consideration" to the need for ensuring the highest standard of efficiency and integrity in the public services and for making public administration a fit instrument for carrying out the social and economic goal of

development. The Committee on Recruitment and Selection Methods (Kothari committee 1976) was appointed to examine and report on the system of recruitment to All India Services and central A and B services. The colonial administrative practice was structurally inadequate and functionally unprepared to meet the new challenges of economic development and social change which came to be accepted by the nation as the new primary concern of the state policy. Thus, the civil service in India has been moulded and oriented in order to face the challenges of new nation. During the earlier stages of civil service development it was characterised by rigid adherence to rules, precedents and procedures, reluctance to delegate authority, feudalistic sycophancy towards superiors and wide disparities in calibre between higher and lower levels. Such problems are less in degree in countries like the USA, the UK, and France.¹⁵

In short, we can say that USA civil service system had managerial background which has been groomed by scientific management movement. The UK civil service system has been by and large evolutionary in its development and rooted firmly with conservative outlook. In France efficient civil service system took place in order to compensate the political system's weakness created by political instability factors. In contrast, the former Soviet Union civil service system was born of the revolutionary zeal and confined to the parameters set out by Marxist-Leninist ideals of creating classless society. Significantly, India has been distinct from the above said countries on three accounts:

1. the need to face the new challenges of newly emergent nation,
2. the need to reform the civil service inhibited with colonial ethos to a more responsible civil service system, and
3. to cope with the development, that is taking place outside India, particularly with developed nations.

Past colonial connections have made India face some unknown civil service problems, which are irrelevant in most of the advanced countries. The other differences in the civil service is only marginal and differ only in terms of degrees rather

than character. One can assume that such variation in degrees occurs because of its distinctive historical development of civil service system. Therefore, a theme or topic or issue wise comparison will definitely help the readers to appreciate the similarities and differences.

Civil Servants and Executive Relationship

It is important to study the relationships between the civil service and other centers of the political system, viz. executive, legislative and judicial.

of civil servants is increased by the delegation of powers of the executive to the civil servants. This is particularly the case of France, India and the United Kingdom. To lesser extent it is present in the USA and in the USSR. Complex administrative factors are by and large the domain of the civil servants. But the powers to control the civil servants, their removal and reforming the civil service develops a complex political relationship between the politicians and the civil servants.¹⁷

Political Rights of Civil Servants

No aspect of administration in modern times have aroused more heated political controversy than the issue of granting certain political rights to the civil servants. Civil servants indifferent countries enjoy a variety of political rights in different ways and in degrees. In most of the countries there are constitutionally protected political rights for the civil servants. Of course, the constitution and various judicial pronouncements also limited the enjoyment of certain political rights by the civil servants. Generally, the following are the important rights that have to be studied under the comparative perspective:

1. Right to vote in elections,
2. Right to contest in elections,
3. Right to freedom,
4. Right to form associations, and
5. Right to strike.

All these political rights are again constitutionally protected for the public. But it is applicable for the civil servants with some restricted sense or with some limitations. The purpose of such limitations is to ensure that the civil servants should not take partisan political attitude and develop political prejudice while extending public service to the public. Besides, politically charged civil servants quite often would be at loggerheads with the political executive in case they belong and subscribe to different political attitudes or groups. In France, the government extended an absolute freedom to civil servants to take part in active party politics. They can become members of the political parties and participate in their activities. The only restraint to

the political role of the civil servants is that they must not disclose the fact that they are civil servants when engaged in political activities and they must not use information which they have acquired by virtue of their office. If strictly followed, these restraints would prevent a senior civil servant to take part in an active political role.¹⁸ In the USA, the civil servants of the top-level in the executive branch can be removed from their positions only as a result of gross insubordination, undesirable personal habits, negligence, criminal acts, or as a result of their jobs being abolished. Many civil servants in the USA at the top-level executive branch play a dual role. They belong partly to civil service and partly to the political objectives of the executive branch. If any conflict develops between them and their politically appointed superiors, the degree of security they enjoy is considerable. Whatever may be the restriction imposed by the government on the political role of the civil servants, one must note that the civil servants are influenced in their choice of priorities partly by the way they perceive the demands of the political systems.¹⁹

1. Right to Vote

Right to vote in elections is generally granted to civil servants in the USA, the UK, India and France within the framework of democracy. In the USSR such rights were granted to civil servants under the strict directions of the central Communist party machinery at various levels. Anti-communist expressions or dissent opinions have resulted not only in expulsion but also imprisonment. They were branded as enemies of working labourers. Political participation of civil servants is not in exercising the votes alone. It also includes the right to collect political funds, to canvas for some elections, to share public political platforms and to use media to propagate the policies of a political party and thereby to solicit the support of the public. For various reasons these rights are restricted in degree, to civil servants in different countries.²⁰

Public employees in France enjoy absolute freedom to become members of political parties and to participate in their activities. Such active participative rights are denied to the civil

servants of the UK, the USA and India. As in the USA and the UK, the Indian civil servants are prohibited in the following political activities:

1. To be a member of any political party or organisation taking part in politics.
2. To be a member or otherwise be associated with or have connection with any banned organisation and other extremist left parties.
3. Taking part in, subscribing in and/or assisting in any way, any political movement in India relating to Indian affairs.
4. Taking active part in holding rallies in support of any political party.
5. Canvassing or otherwise interfering with or using his influence in connection with or taking part in an election to any legislature or local body.
6. Acting as an election agent, polling agent or counting agent of a candidate at elections.
7. A civil servant should endeavour to prevent any member of his family from taking part in aid of or assisting in any other manner, any movement or activity which is subversive of the government.

Thus, from the perspective of political rights the French civil servants enjoy maximum and unrestricted rights than their counterparts in India, the UK and the USA. Recently, the USA courts have substantially enhanced certain political rights, like freedom of thought and right for association. In Britain the political activities of its civil servants are monitored by the Treasury Department. The principles of anonymity, political neutrality and not taking active political role pervade the British civil service. However, there has been a debate on the desirability of making higher-level posts in the civil service more 'political' and to allow for passive political role for the civil servants. But so far it has not been granted by the parliament of Britain. The British conservative attitude believes that when a government changes in response to the expressed verdicts of voters, then the political neutrality of the civil servants is an essential

prerequisite of bureaucratic continuity. Incoming governments would not trust civil servants appointed by their predecessors, if neutrality was not guaranteed.²¹ In contrast, French occupants of senior posts may change as government changes, while in the USA most occupants holding senior posts change when the presidency changes. It is interesting to note that in the USA even today there are about 10,000 senior civil service positions which are politically made after every election of a new president. In contrast, in the USSR there was a practice of party scrutiny of appointments and promotions to civil service posts and the existence of parallel party apparatus to monitor the political commitment of the civil servants towards Communist ideology. Thus, in former Soviet Union unlike other western democratic countries, a high degree of political participation within the fold of communist ideology was something compulsory. To lesser extent in India there has been politicisation of civil service at the top level both in central and state governments.²²

It should be remembered that strict vigilance over the political perception of the civil servants is neither possible nor desirable. However, neutral the civil servants may be, they may involve themselves in terms of partisan politics, because day-to-day business of a civil servant has to do 'politics' in many ways.

For example, preparing policy options for ministers, (UK and India) assessing the strength and weaknesses, objections and desires of various interests is likely to be affected by choices among policies or by different ways of implementing policies, comparing relative costs of various methods of administering policy, evaluating on-going policies and so on. In these activities, the civil servants are directly involved in 'politics' of their political bosses. Particularly the role of special advisers and planning staff both in India and the UK are fundamentally political in nature.²³ By politically committing themselves, the civil servants may also want to promote their self-interest or thereby form a cordial relationship with the politicians. Likewise, the Senior Executive Service (SES) in the USA is composed of top-ranking civil servants. By virtue of Federal Civil Service Reform Act of 1978, 10 per cent of allocated positions in the SES can be purely political appointees. The rationale behind the SES

was to make these high ranking administrative officials, responsive to political executive. In India, also after every election of a prime minister and the council of ministers there was reshuffling and reassignment of posts in the top ranks of the self service. Therefore, realistic appreciation of the civil servant and politician warrants that under some context the political role of the civil servants at the top level is inevitable.²⁴

2. Right to Contest Elections

The right to contest elections by the civil servants has a divergent practice in different countries. Particularly France is noted for its liberal electoral laws for the civil servants. Irrespective of their level in administrative hierarchy, civil servants are allowed to contest in elections to any representative office in the country. Besides, they also eligible to enjoy their pensioner benefit and seniority of service rights while serving as representatives of certain public offices. But in the USA, the civil servants are allowed to contest for election only at the local level provided that such participation would not affect his efficiency. On the contrary in India, the Public Service Conduct Rules (PSCR) does not allow political activities. From 1947 to 1960 the Government of India, allowed the civil servants to contest for elections at the local level but later even this was prohibited.²⁵ In the USSR there was not much difference between politicians and the civil servants and the civil servants were allowed to contest for election under the direction of the Communist party command at appropriate levels.

3. Right to Freedom of Expression

Both in India and the UK civil servants do not enjoy the right for freedom of expression. Besides, civil servants are also expected to seek the prior permission of the competent authorities for publishing books, articles and speaking to general audiences. In the USA, the federal employees are allowed to express their views on political subjects not on the capacity of a civil servant but only privately. Above all, France further allows its civil servants even the right to criticise governmental policies and their manner of implementation subject to the observance

of the principle of reverse. A French official outside his official work can criticise the government and express his views contrary to the general policy of the government. However, there should not be any personal criticism directed at the work of the particular service to which he belongs.²⁶

4. Right to Association

Right to form a group of persons with some common interests has been recognised by the constitution for the general public. But such rights are extended with some limitations to civil servants in various degrees in different countries. The professional associations were recognised by the Soviet Union again under the strict observation of the communist party, but such an association should not associate itself against interest of the Communist party. In France, civil servants enjoy the right to association including the right to associate with the trade unions. The French civil servants can uphold their political ideologies by joining any of the trade unions. But both in India and the UK there are certain restrictions imposed upon public servant's rights to association.²⁷ Particularly in the UK, civil servants are not allowed to associate with the outside unions which believe in communism. In India, the right to association has been guaranteed to public servants by virtue of Article 19 of the Chapter on Fundamental Rights of the Indian Constitution. Civil servants therefore, are free to form associations or join associations already in existence. But the government would consult or negotiate with only those associations which have been recognised by it. So, there is a mandatory requirement that every association in order to negotiate or to interact with the government should register itself under the Registration of Society Act, 1956 and thus become eligible for recognition by the government. As noted earlier, the right to join unions has been upheld by the US Supreme Court in several of its judgements. However, the court in its verdicts prohibit civil servants joining illegal or unlawful associations. But the onus of proof that a particular civil servant actually participated in the unlawful objectives of the association lies with the employer (federal, state or local government).²⁸

5. Right to Strike

Strikes are the general means to convey the anguish of the employees over certain matters to their employer. It is mostly adopted only by the organised labourers in the industrial sector. But today such labour tactics have influenced the minds of civil servants as a means to negotiate with the government, while in former Soviet Union, strikes by civil servants were considered as an act against the state and ruthlessly controlled by state machinery. The KGB was the organ which was responsible for preliminary investigation of anti-communist activities of the civil servants. Disciplinary penalties were imposed on the soviet civil servants who stood against government policies or order.²⁹ The criminal codes contained more or less clearly defined cases of offences which could not be committed by the holders of office (civil servants). Besides, the Committee of party and state control which was set up in the year 1962 enjoyed considerable power in punishing the highest category of administrators. They could stop any action of officials which could cause harm to the interests of the state. So, the right to strike was absolutely non-existent in the former Soviet Union.

In France, barring certain categories such as top civil servants, foreign service and police personnel all other categories enjoy the right to strike. But the right to strike can be used only as a last resort of collective bargaining with the government. In contrast both in India and the UK civil servants have not been specifically denied the right to strike under the law, but the Constitution of India never granted the right to strike to public servants as a means of collective bargaining. In regard to the right to strike the US has a distinctive feature. Under the US Labour Relation Act public servants do not enjoy the right to strike. But gradually the various federal unions are asserting their right to strike. However, federal employees live under specific statutory prohibition of the strike. The law is tuned against the employment or retention in employment of any person who participates in any strike or asserts the right to strike against the government of the USA. Of course, there has been wide misconceptions about the right to strike.³⁰ In recent court care, the United Federation of Postal Clerks sought the

invalidation of portions of several federal laws that denied employment to those participating in any strike against the US government or asserting a right to strike. Thus, there is confusion over the issue of strike in the USA. However, it should be understood by us that at present public servants in the USA remain overwhelmingly prohibited to strike under law.

Political System and Political Rights

An overall comparative evaluation of political rights in these five countries can be reasonably listed as follows:

India

Still adheres to the colonial concept of political neutrality. Mass political participation and new administrative actors with economic, social background may tilt the concept of political neutrality. However, as far as granting of political rights to civil servants are concerned the government is rigid and conservative in outlook.

United Kingdom

There exists a fairly high degree of political rights for public servants despite the important factors enumerated below:

1. That there exists a constitutional monarchical form of government, and
2. Generally the British is noted for their high esteem of tradition and more influenced by conservative thoughts.

United States of America

Political rights to civil servants is rigid and recently the supreme court granted and safeguarded the legitimate constitutional rights to civil servants that would be normally allowed to the public.

France

It is noted for its most liberal position in granting political rights for its civil servants. Such liberal granting of political rights helps in co-ordinating the relationship between the politicians and civil servants in policy-making areas.

Soviet Union

Being a regime based on an ideology, all social relations were relevant to politics and that politics must shape all aspects of

In the USA, the UK, France, India and the USSR there is restriction for remunerative activities outside the service. It is also mandatory for the civil servants in these countries to declare the occupations of their spouse. Civil servants are generally prohibited business activities. All such restrictions are imposed on civil servants not only to safeguard the interest of the state but also to protect civil servants from becoming an easy prey to corruption.³⁴

In France civil servants could not be sued in any civil court of law unless the government permitted such an action. This particular privilege was repealed in the year 1870 and now suits can be filed against the civil servants when the damage in question was caused by the decision of the civil servant acting in his official capacity. On the other hand, the Soviet counterparts were only answerable to the party apparatus for their omission and commission. The involvement of party officials in administration prevented clear lines of authority from becoming established. There was no scope to get any sort of compensation from the erred public servants or from the government. However, there were checks of varying frequency by the procurators, the party and the various commissions or committees. Under the control of Communist party, various laws were enacted to streamline the attitude, behaviour and conduct of the Soviet civil servants. Unlike other western democratic countries, there were no common civil service conduct rules but there were specialised application of disciplinary laws to particular branches of service.³⁵

In subordination to official hierarchies was severely dealt with in the former Soviet Union. The penalties imposed generally consisted of a reprimand of varying degrees of severity, reduction in rank, or dismissal. Appeal by the civil servants was limited only to next authority in the hierarchy. When officials caused material damage by his neglect, his salary could be surcharged. Like in India, the USA, the UK and France, the soviet counterparts were liable for ordinary breaches of the criminal law such as embezzlement or fraud. In criminal suits, the Soviet civil servant was allowed to enjoy the provisions of the Code of Criminal Procedure.

In USA the common conduct rules of civil servants are again derived from the Hatch Act 1940. But the Act does not specify what they prohibit. However, in case of India, the All India services (Discipline and Appeal Rules, 1955) are specific in nature and wider in its scope. The rules of disciplinary procedure are similar for both central and state services.³⁶ In the USA, federal employees are forced to discourage the political activities of their spouse. Generally, public servants should not use their position to subvert the political goals being pursued by the elected government and the political community as a whole. Subscribing to communist ideology was considered as disloyalty to federal government during the 1940s and 1950s which is known as "McCarthyism." The loyalty of public servants was examined by a loyalty review board. Any adverse report of the board would result in the dismissal of the servant. A dismissed civil servant could appeal to Supreme Court. Today in the USA public employees enjoy constitutional rights to appeal to the higher court if

1. the basis of their actions was the exercise of an ordinary constitutional right such as freedom of association,
2. labelled as dishonest or immoral, and
3. dismissed.

There is also much scope for public employees liability in civil suits for damage resulting from the violation of an individual's constitutional rights through an employee's action within the sphere of his or her official duties. prescribing to democratic norms the civil servants are consulted in determining the nature of working conditions in government employment as in India, France and the UK.

Like in the USA the Indian civil servant's arbitrary dismissals are protected by virtue of Article 311 of the constitution. There is scope of appeal in disciplinary proceedings but it can be withheld by the deciding authority. The government of India in order to check corruption in public services appointed a committee in December, 1965 known as the Santhanam Committee on Prevention of Corruption. The committee

recommended and affected amendments in the Discipline and Appeal Rules for central government and ensured the satisfaction of a government servant that his case has received due consideration. There are also some special agencies to initiate, conduct and conclude disciplinary proceedings against civil servants (Central Administrative Tribunal and State Administrative Tribunal).³⁷

In the UK up to a certain level every civil servant's work is the subject of confidential annual reports by the head of this unit in which he serves. Like the USA, India and France discipline is maintained by the administration of reprimands and penalties such as stoppages and forfeiture of annual increments, loss of promotion, suspension from duty, in the last resort dismissal without pension or gratuity.

Other General Condition of Work

There are certain general condition of work which are similar in the UK, the USA, India, France and the USSR (with some exception) which are listed below:

1. Five days work in a week,
2. Overtime is allowed for civil servants of lower grade in the UK, the USA and France. In India and the former the USSR it was abolished,
3. There are public holidays and privilege holidays and special leave with pay.
4. Sick leave (paid and unpaid) is allowed.
5. Insurance coverage by the government is available in the UK, the USA, the USSR and France.
6. Established women civil servant are entitled for maternity leave which is allowed for two months with payment, and
7. Equal employment opportunity for representation of minorities in the public services (UK and USA). In India there is reservation of jobs for scheduled castes and scheduled tribes. Today in India even the most backward classes were included in the reservation category after the Mandal Commission Report.

Evaluation of Civil Servants

Top civil servants in India are evaluated on the basis of seniority-cum-merit and half yearly confidential report. The members of Union Public Service Commission are also involved in preparing the list of names for top civil service posts and the ministers select civil servants from the prepared list. But in the UK and France capacities and qualifications of employees are closely scrutinised and will be selected by the departmental head. In Soviet Russia, a combination of political agencies were involved in evaluating a person on various aspects. One is that officials must be evaluated with due regard to their political and practical or professional abilities.³⁸

The USA has an edge over other countries in evaluating their public servants known as Afficiency Rating System and it was the result of Scientific Management Movement (1920). It is a system for discovering, analysing and classifying the differences among employees *vis-à-vis* job standards. It gained greater attention as a part of federal civil service reforms. Appraisals are generally done by supervisors, peers, the employees themselves, by groups, by external evaluators, or by some combination of these. The major techniques in the appraisal are as follows:

1. Rating scale.
2. Essay Report—Focusing on an employee's need for further training and his or her potential and ability to obtain results.
3. Check-list—It consists of statements about the employee's performance. The rater checks the most appropriate statements. Some of these may be given greater weight than others in reaching an overall appraisal.
4. Critical incidents—It is an approach requiring the supervisor to keep a log of employees, performance, indicating incidents of both good and poor performance.
5. Forced choice—This requires supervisors to rate employees on the basis of descriptive statements.

6. **Ranking**—It is a process where there is comparison of employee with the other.
7. **Forced Distribution**—It requires the rater to place employee in categories such as top 5 per cent next 10 per cent, next 25 per cent and so on.

A combination of these techniques are used in appraising the civil servants for their promotion or for appointing them in top civil service posts. Thus, there is a strict application of scientific management principles in selecting meritorious people. In India public servants have to pass the efficiency bar test to justify grant of increments. Only the minimum level of efficiency is required to justify for promotion or for an increment. A committee is constituted in each department and it records its findings to the suitability otherwise, of an employee to cross the efficiency bar and the competent authority on the basis of the funding of the committee, issues orders either permitting or stopping the employee cross the efficiency bar.

Innovations were added to evaluate the efficiency of the servants in the UK during Thatcher's period. The government appointed Rayner as an adviser on administrative efficiency. An 'efficiency unit' was formed which was compared of civil servants and outside consultants. The unit aimed to improve the efficiency of civil servants within the White Hall. It was considered to be the first step towards managerialism of public service in Britain. But unlike the USA, the efficiency unit was applied only to an organisation as whole than individuals. It was now placed under the control of cabinet office.³⁹

There are problems in using these appraising techniques in different social settings of different countries. The problem with this system is that it is prone to subjectivity and negligence of the rating officer. However, in the USA the federal government established a Bureau of Efficiency in 1916 for looking after rating work in various departments. Any discrepancies, if found by any employees can be referred to Personnel Arbitrary Council and the minorities can make representation to EEOC, if there is any kind of racial prejudice. Such management orientation is conspicuously absent in India due to various social problems

like rigid caste system and heterogeneity of the population.⁴⁰ Despite the rhetorics about equal opportunity to all castes in India (particularly SC and ST) little progress has been made. A more realistic and humanistic appraisal method is of utmost important for the increase in the efficiency of civil servants.

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Personnel Administration— A Comparison

Introduction

The central question of public administration in modern government rests with the public personnel management. To a very large extent the nation's ability to achieve the goals through public administrative action depends upon the performance, honesty, and motivation of public employees. Personnel administration covers the problems of recruitment, training, remuneration, promotions and retirement. It also includes the allied activities such as performance evaluation, position classification, morale and discipline among the members of public services. Personnel administration is generally studied in terms of institutions and principles. But it should be remembered that the constitution of organisations and governments are not mere charts and works. It basically consists of human elements and therefore a careful understanding of human behavioural studies also becomes one important aspect of public personnel study. Every modern democracy has evolved its own public personnel system based on its history, social, political and economic conditions.¹ There are certain general and unique features of personnel systems in different countries.

By taking the major contents of personnel administration such as recruitment, training, promotion discipline, morale, and superannuation we can apply it to different countries and compare them with one another.

Such comparison is useful to identify the relative merits and defects of a system of personnel administration. Secondly, it may be helpful in importing new ideas and institutions from one country to the other. The purpose of comparison may well be more than describe two or more phenomena (objects, persons, areas, events and institutions).² One pre-requisite of judgement about the institutional arrangement is to compare and contrast them with other similar institutions. When we compare the administration and its working in the UK, the USA, France, the USSR and India, the primary intention is to tell the major differences. There is nothing wrong with the country-by-country approach as long as its major aim is to bring out the differences. The comparativist may try to develop certain generalisations about personnel administration and compare all countries with that generalisation. Thus we refer to as conceptual framework comparison. No doubt, there are obvious dangers in such comparisons. Firstly, there is the problem of criteria and secondly, it is the question of standard. The dangers are most obvious when we ask the question, "Which country's personnel system is more efficient?" Such questions are highly value-laden and if made may result in unscientific comparison.³

Every comparativist has a different set of mind. He can select different criteria to make comparisons. So long as criteria is exactly stated there is no problem of comparison. Comparison of personnel administration will be sensible only if it is studied from its socio-political environment. They are likely to differ and ultimately produce different kinds of personnel institutions. Comparing every aspect of personnel administration must inevitably lead to endless permutations.⁴

In comparing personnel administration of different countries, it would be sensible to select countries which roughly have similar socio-political and economic conditions. Our comparative study of personnel administration of the UK, the USA and France has many common characters. The common

features are that they are democratic governments, urbanised societies, have a high standard of living, with extensive social service, with legal rational administrative systems and large and highly qualified bureaucracies subject to various kinds of control. Though India subscribes to some of these common features, it is predominantly an agrarian society, less urbanised and is passing through a transitional period with more of unsettled personnel administrative problems.⁵

Soviet Russia presents an entirely different situation. Therefore, it is necessary to bring out the environment (political, social and economic) in our study. Otherwise there would not be reasonable comparison between democratic and non-democratic countries public personnel system. If there is no drastic environmental differences, we can simply ignore them for the purpose of comparison. Even here if we want to sharpen our comparison, the environmental background is far more essential.⁶ In Chapter 4, we have already developed some acquaintance with the nature of political system and the policy-making institutions.

As we stated earlier, comparative public administrative movement has identified the existence of two standard models of public administration in this universe. They are the British and the USA model of public administration. Britain is noted for its most co-ordinated system of administration and the USA for its unco-ordinated system which at the same time modifies itself to shift various environmental changes that occur. Based on these two different models, almost every other country's public administration is fixed. And if at all there is much deviation from this paradigm it may be because of other social and political reasons peculiar to those countries.⁷

French Model for Personnel System

What could be the standard personnel administrative system to which another country's personnel system can be reasonably compared in their different environmental settings? Possibly the one country referred to by F.F. Ridley is France (perhaps from his point of view it may be appropriate). For Indian students it is worth-while to compare and contrast other nations, personnel

system from the point of Indian personnel administrative establishment. But there are practical difficulties if one chooses India as a standard for certain known reasons. They are as follows:

1. Most of the modern techniques of personnel system are borrowed largely from the United Kingdom.
2. It is not as stabilised relatively as that of France, the UK and the USA.
3. It is not an outgrowth of our own socio-political environment. It was first imposed on us by the colonial rule and was tinkered here and there to suit the post-independent period.
4. Our own national experiences on personnel system is not only of a short period but are exceptionally limited.
5. New ideas and experimental experiences on personnel system and institutions have not been generated as our own. It is still coming from elsewhere (example ombudsman-like institutions, organisation and method, most of the budgetary innovations).

The above mentioned facts have added doubtful credential to consider Indian personnel system as a 'standard' for comparison. Therefore, the most simplest way is adopted. That is, first to select major themes of personnel administration and to state how it is differently observed in different nations. It is a straight-forward comparison which is primarily intended to highlight both the similarities and the differences.⁸ To the extent possible, the reason for its similarities and differences can also be made in order to satisfy some of the scientific theories and observations already in the field of public personnel administration. The major conceptual areas under which the personnel system is going to be compared are recruitment, training, remuneration, promotions and retirement.

Before taking the areas one by one a short profile of history of personnel administration in the USA, the UK, France India and the USSR is greatly appreciated. The historical background can also explain why a certain feature of personnel system is so unique in some countries and not in others. Let us examine the

history of personnel system of the five countries more from comparative framework than individually treating them distinctly.

Historical Background of Personnel System

France claimed to be the oldest form of public personnel system even through there are historical accounts which subscribe that well-established personnel system existed in China (353 BC) and Kautilya has accounted the existence of a well-established administrative system in his most celebrated book *The Arthashastra*. But these earlier personnel, institutions and practices of administration has been considered by western scholars for various reasons shall we refer, it was never western scholars' academic hegemony or they were ignorant such historical truths.⁹

The earliest known modern personnel system in France was the institution of prefects. It is an inheritance of the pre-1789 System of Intendants. Pre-1789 French society was administered by 30 Intendants under the direct control of the king of France. Each intendant was responsible for the administration of a single province and there were totally 30 provinces. In 1800, Napoleon Bonaparte provided successors to the Intendants and replaced provinces with territorial divisions. Each territorial division was administered by prefects. During the nineteenth century the prefects took charge of the entire administration of the territory under their control. They were charge of public order, the police and the preparation of elections. In the course of Second, Third and Fourth Republic the prefectural administrative power had steadily increased and they were also largely represented as the advisers of the cabinet ministers from earlier times.¹⁰

In England during the same period of historical development it was the parliament which asserted the right to control the crown, while in France a highly centralised administration was being established which asserted the right to assist the king and to control him. The French prefects were appointed based on the patronage, kinship and appointed by feudal lords. Despite various changes in the prefectural system of administration since 1800, the basic original features are still maintained. Today, the

prefects and sub-prefects are government's appointees at the local level in charge of local administration. However, the prefectural career is now a regular civil service career. It is open to graduates of the Ecole Nationale d'Administration. The other pattern of personnel system was started by the French king and was reaffirmed by Napoleon. Democratic and rational legal administrative elements were introduced later by successive regimes, where liberal or authoritarian.

The historical development of personnel system in the USA was under a free political atmosphere since 1789. David H. Rosenboom classified the history of personnel system in the USA under three categories. They are:

1. The gentleman era (1789-1828),
2. Spoil system (1829-1882), and
3. Merit system (1883-till date).

The gentlemen period of personnel system was started with Washington's first administration in 1789 after the formation of the United States of America. Washington adopted 'fitness of character' as the basic criteria for appointment of personnel. And most of the appointments were given only to persons of high social status (only to the rich). The gentleman era attempted to develop political neutrality in the administrative branch. But for political reasons it was put to an end by the advent of Jackson as the American president in 1829.

He institutionalised the spoils system by developing politically convincing rationale for it. His system of merit recruitment was introduced only by 1865-1869 during the tenure of Andrew Johnson as the USA president. Merit system was backed by legal provisions by the passing of Civil Service Act in 1883 (also known as Pendleton Act). Further reforms in personnel administration were introduced during the tenure of Jimmy Carter (Civil Service Reform Act, 1978). The unique contribution of American personnel administration to the world is certainly the 'Spoils System'. It was not purely based on patronage or kinship or an appointment of a person to civil service based on his social status. In a spoils system, public service posts were given to persons who politically helped the incoming

American president after facing the highly competitive elections¹². Even today in the USA the legacy of spoil system is practised in the top appointments by the president. It is a unique blend of spoil system at the top followed by career bureaucracy of permanent tenure selected on the basis of merit by an autonomous recruiting board.

While the USA and France were successful enough to differential the role of administration and government as a distinctive one, such distinctions never occurred in Britain till the beginning of the nineteenth century. The evolution of state system from the twelfth century to the nineteenth century, there were no clear distinctions between administrative and political role. Recruitment was largely by patronage to the members of royal families and to the feudals of landowning classes.

Merit based recruitment and rational-legal modes of personnel administration in the UK started only by the nineteenth century. The modern personnel administrative system in the UK was formed by two major official investigations of civil service:

1. The Northcote-Trevelyan Report, 1854.
2. The Futton Report, 1968.

Generalist administrators' has been a unique contribution by the British experience of administration to the world. The Northcote-Trevelyan report recommended for merit system of recruitment and also firmly affirmed the need for generalist service. The Futton committee strongly apposed the generalist cadre of British top civil posts and it wanted to induce more professionalism into the service. Out of 158 recommendations the most striking recommendation was the creation of career management approach to public services. Thus, a permanent civil service systematic recruitment, and a clear division of authority and uniform rules for civil servants emerged only in the early part of the nineteenth century. The American experience of spoil system never took root in Britain. In the same way, the legacy of past administrative institutions like that of the prefectoral system of France has not been an experience of the British personnel system. However, by the beginning of the nineteenth century the UK, the USA and France never failed to

induct merit system in the recruiting process. Secondly, the clearly differentiated the political role from the administrative role. In these three countries civil service is largely regulatory in nature. But by the beginning of twentieth century, it expanded very widely and included many social services under the control of permanent civil servants. For instance, in the UK new kinds of services were included with the passage of the Old Age Pension Act of 1908, the Labour Exchange Act of 1909 and the National Health Insurance Act of 1911.¹³ It was rightly recommended by Professor Greaves that “the social service democracy of the twentieth century was born before the maladministration and paternalism of the eighteenth century had wholly disappeared. The only major difference is that both France and Britain developed their personnel system from a centralised administrative framework. On the other side the USA expanded its civil service from the requirement of a federal polity.

Indian personnel system of administration has been largely a product of British colonial rule. In fact, the present roots of Indian administration can be traced back since the establishment of East India Company in India on December 31, 1599. In 1858, the company was abolished and the ruling power was assumed by the British Crown. Recruitment to top civil service posts was done by the British Imperial Power in London.¹⁴ The rest of the subordinate and clerical service was recruited locally. The Indian Civil Servants (ICS) were the agent of the British government recruited by the Secretary of State for India. To recruit Indians for civil service, a separate civil service called the Statutory Civil Service called the Statutory Civil Service was created in 1879.

In 1877 Britain appointed Aitchison Committee and recommended the admission of Indians in the civil service. Later, improvements in the Personnel System coincided with various political movements for freedom in the country. After independence the Indian leaders allowed for the continuance of the British Personnel System with slight modifications. The British legacy was completely served only by the year 1980 when the last ICS cadre retired. On the whole, independent

India inherited two important features of British administration—maintaining a distance between the government officials and the public, and elaborate rules and regulations to ensure both honesty in the administrators and effectiveness in the maintenance of law and order. Subsequent commissions and committees appointed by the central government of India have totally changed to the larger expectations of the mass.¹⁵

The important committees are:

1. G.S. Bajpai Committee (July 1947) to investigate the question of personnel shortage.
2. Gopalswamy Ayyangar Committee (1949) to improve the efficiency of administration.
3. Paul Appleby (1954) to introduce action-oriented administration and the establishment of O and M (Organisation and Methods).
4. Administrative Reform Commission (1966) to make a comprehensive study of administration at all levels.
5. Balwantrai Mehta Committee (1957) to improve the rural development administration.
6. Ashok Mehta Committee (1977) to improve the machinery of administration at the rural side.
7. Kothari Commission (1978) to induct new recruiting methods for top-level civil servants in India. This commission has more relevance with respect to the personnel administration in India.

Unlike the USA, the UK and France, India inherited a personnel system under an enslaved condition. The British colonial service was largely confined only to tax collection and for regulatory purpose. People were totally alienated to such civil service system. That is why after independence India instituted several committees and commissions to reform the system of administration in order to cope up with the development attained by European countries.

In more democratic states like the UK, the USA, France and India one can witness the evolutionary nature of personnel system. The system of personnel administration differed in these

countries on the basis of peaceful constitutional development, new economic challenges, expansion of social services, changes of leadership through peaceful means and a host of other non-revolutionary factors in the respective countries against their historical and social factors. On the contrary, the situation concerning the personnel system in the former the USSR was complicated by the existence of a parallel bureaucracy in the communist party. Personnel system in Soviet Union was largely a product of the Bolsevik revolution of October 1917. The revolution drew its inspiration from the legacy of western political thought as interpreted by Marx and Engles. Communist political ideals become the force in shaping and moulding the personnel system. The revolution put an end to the feudal patronage of bureaucracy which was there in Russia for nearly 304 years. Since 1917 there has been complicated interaction between communist ideological principles and the realities of power. The collision gave rise to an entirely novel personnel system. It was essentially antidemocratic, anti-capitalist and developed under the watchful eyes of the communist party.¹⁶ It is difficult to characterise soviet personnel system in a true Weberian sense. Most elements of personnel rationality such as open competition, professionalism, established procedures and political neutrality were all missing. The involvement of party officials in administration indeed prevents clear lines of authority from being established. In fact, the entire administrative apparatus has become an intrinsic part of the structure of power itself. Such feature makes difficult the comparative study to Soviet personnel administration. In short, personnel system in democratic countries are totally different from that of the USSR. Communist leader proclaimed that their personnel system was anti-bureaucratic and strived to develop egalitarian elements within the system. Unlike the western system, the USSR personnel system was mutually in support of the party. Administrative machinery was treated more as vehicle to carry forward the orders from the communist party in various social and economic services of the largest territorial country of the world.¹⁷

Recruitment

Recruitment to public services is of central concern to administrative organisations. A firm recruitment policy is something essential to an efficient administration. According to Stahl, "It is the cornerstone of the whole public personnel structure." In ancient times there existed a very good system of recruitment in China for public service personnel based on competitive examinations. In modern times, Prussia was the first country to introduce merit-based recruitment. Competitive merit system was later introduced in the UK (1859), the USA (1860), India (1853) and France. A combination of merit and political party affiliation was the criteria for recruiting people for civil service in the USSR since 1917. Despite the fact that merit system is being followed, in reality in all these countries only the upper strata of society is predominantly appointed.¹⁸ There is a class bias of recruitment, irrespective of political, social and economic differences.

Recruiting Methods

Though the recruiting methods in most of the countries are marching towards merit-cum-competitive system, however, there are countries which differ in their recruiting policy, principles and practices. The dominant pattern of recruitment in the USA is the application of managerial approach. In purely competitive examination the person who achieved the highest score would be hired first, while the person who scored the lowest passing grade would be hired last.¹⁹ If enough positions are available, passed candidates are enlisted in eligible register and they are ranked in accordance with their individual scores. In the USA, they follow four different kinds of recruiting techniques. They are:

1. Performance examinations.
2. Written examinations.
3. Oral examinations.
4. Ranking tests.

The two major federal examinations administered to college graduates for general administrative careers are the Federal Service Entrance Examination (FSEC) and the Professional and Administrative Career Examination (PACE). In the USA minimum educational qualification is not needed. He should only qualify himself in the above said competitive examinations. But in India, the UK, and France definite educational qualification is required. In the USA, if a person wants to be appointed to a civil service post, he should prove his residential qualification. The Equal Employment Opportunity Commission (EEOC) in the USA has the power to oversee whether minorities, particularly Blacks, Hispanics and women are adequately employed or not. In India there is 30 per cent reservation for female sex. The reservation also extends to the scheduled castes and scheduled tribes in India. Reservation of civil service posts for certain minority classes is not much in vogue either in Britain or France. A striking feature of recruitment after the Fulton Committee Report (1968) has been on tapping private sector expertise in civil service recruitment in the UK.²⁰

In contrast to American and French experience, India and the UK relied more on non-specialists in the career civil service system. It rested on open written examinations set by the civil service commission in academic subjects. After the successful written examinations, the candidates personality is tested by interview methods. For the past 50 years in the UK, there are three kinds of non-specialist civil servants being recruited by fixing the following qualifications.

1. Administrative class—recruited primarily from university graduates. Age 21-28 years.
2. Executive class—recruited at matriculation standard, minimum age 18 years.
3. Clerical class—required qualification is a pass in the first major school examination (General Certificate of Education). Minimum age is 15 years but recruits are accepted up to the age of 59.

In India, young men and women in 18-28 age group enter the services. For specialised jobs experienced persons are

appointed. Like the UK practice even in India, a university degree is not essential to all clerical, central class III and state subordinate non-clerical services. The minimum educational qualification fixed for these services is a secondary or intermediate certificate (+2 certificate of general education). For Upper Division Clerk (UDC) and central class III non-clerical services, a pass in plus 2 is essential. A university degree is required for All India and central, class I, central class II (gazetted and non-gazetted) and state subordinate (gazetted) services. Recruitment to the All India Central Services (class I) is made on the basis of common entrance examination. It consists of three sequential examinations. They are:

1. Civil service preliminary examinations (objective type question—for screening purpose).
2. Civil service main examinations.
3. Interview (personality test).

The three levels of recruiting method somewhat unique in India, is a time consuming process not found in the USA, the UK and France. It is practised in India in order to filter the non-serious and average candidate. This system of recruitment has been followed in India since 1978 on the recommendation of Kothari Committee Report (1977).²¹ Unlike the practice as we had seen in the USA, the UK and India the French recruiting method of civil servants are somewhat very different. The French civil service is organised on the basis of "Corps"—categories of staff which form the groups into which recruitment occurs. The National School of Administration (NSA), the Ecole Normale, Supérieure, the Ecole Polytechnique (School of mining public works, etc.) and Ecole Centrale des Arts et manufactures gives the country the greater part of its upper technical staff and also many of its managers. Members of the 'grands corps' (which includes the senior level of general administrators) are recruited from the graduates of special competitive entry training schools founded by the state.²²

Compared to Britain the USA and India, the process of pre-entry training ensures that entrants to the civil service are already trained specifically for the requirement of government services.

Even at the school level, the average students are skimmed off and the best-suitable candidates undergo rigorous training. Among all the schools which were started during the Napoleon period, the newest one is that of Ecole Nationale of Administration (ENA) created after the Second World War.

After graduation from ENA, the age of 25 years, the ENA graduate obtains a high position in government or diplomatic service. There are at present 7,500 strong civil servants and they make policies side by side with the elected officials. The informal co-ordination among the French civil servants is much more than that of their counterparts in the USA, the UK and India, because in countries other than France, the civil servants have no specialised administration education or training prior to entering service. According to Peter Self, the intellectual background of French administrators is highly homogenous, and of a kind which inspires of competence and superiority feelings that are less apparent in the British case.²³

Another important feature to Britain, India and the USA is that in France it is common for civil servants to interpolate periods of elective office or even to hold local office whilst still acting as an administrator. Historically also, the recruiting methods in these countries have been ordained for particular class of administrators. For instance, Britain and India prefer only generalists, USA for specialists, and France for technocrats. Though the functions and powers are the same they differ on the matters of their recruitments. Of course, Soviet Union civil servants needs to be separately treated as they were of distinctive class as far as their a recruitment is concerned.²⁴

However, there is one common characteristic feature that has been noted down by V. Subramanian in the general recruitment of civil servants in these four countries. He opines that there is a disproportionate representation of those with middle class origins. Despite different social, economic and political structures, such trends are visible in the USA, France, and India (author wants to add Britain also in such a category). Let us study the recruiting method that was adopted in former USSR as an example of non-democratic country.

The description of the administrative personnel must be confined to the personnel show who falls into the category of 'holders of office'. All state employees, higher or low, were subject to the same conditions of recruitment. Further, there was no uniform system of recruitment to state service in Soviet Union. It was governed by various legislative enactments, which vary from one branch of service to another. In general, each head of service recruited his own senior staff in conjunction with the appropriate party authority.²⁵ In this respect, it is apparently much close to the American practice of appointing 'political executive' to the heads of the various departments. At the highest level, the union minister and the minister were responsible for recruitment in co-operation with the department of the Central Party Secretariat in whose competence the particular ministry fell. The following criteria was adopted for recruitment to all kinds of civil administrative posts:

1. Officials were recruited with due regard to their political and practical or professional qualification.
2. Basic education and loyalty to party policy and discipline.
3. Practical qualifications as were prescribed by the departments by numerous legislative enactments.

The conditions and methods of recruitments to various administrative levels were not only made by legislative enactments but also directives of the council of ministers and by the members of the state committee. Many enactments generally pronounced that there would not be any discrimination based on sex, and ethnic origin. Thus, the most important contrasting feature of Soviet case in relation to the USA, the UK France and India is that appointment to civil service was made on the basis of party membership, political, activity and 'correct' political attitudes.²⁶ There were additional factors influencing decisions concerning appointments. On the other side, 'political neutrality' has been the watchword of the administration for civil servants in the USA, the UK, and India. As far as political affiliation is concerned France and the USSR come closer and in other aspects they are different.

Personnel recruiting policy suffered from two important constraints in the USSR. Such constraints are not faced by the USA, the UK, France and India. They are:

1. the problem of maintaining a balance between the subjective consideration (*i.e.*, loyalty to communist party) and more technical requirements.
2. the personnel system in recruiting sphere failed to evolve a common framework in evaluating professional standards for various administrative units.

On the whole Soviet model presents a system in which there was a single bureaucratic chain with no constitutional division between the politburo or ministerial policy members and the lower officials who executed them. Every union and state ministerial network in total, employed hundred of thousands of trained officials. Staffs were recruited not according to strict civil service criteria but largely through informal networks. Elements of competitive entry appeared to be only rudimentary.²⁷

Training

The second important aspect of personnel administration is training. According to William G. Torpey, "Training is the process of developing skills, habits, knowledge and attitudes in employees for the purpose of increasing their effectiveness in their present government positions as well as in preparing them for future government positions. Generally, there are two types of training called formal and informal."²⁸ The following are for formal training type:

1. Pre-entry training.
2. Orientation training.
3. In-service training.
4. Post-entry training.
5. Departmental training.
6. Skill and background training.

The informal training can be classed as:

1. Training by experience,
2. Training by communication,
3. Conference method,
4. Syndicate method.

Students are aware of such training methods from a reading of general public administration books. Here, we are going to compare the most important training methods such as pre-entry and some of the other informal training methods.

The best methods of training is imparted to the civil servants only in France. And to the other extreme we find former Soviet Russia where the government paid scant regard for pre-entry training, while other countries like the UK, the USA and India have varied kinds of training and try to follow on the footsteps of France as far as training methods are concerned. In case of Soviet Union there was no practice of civil servants training in a formal way as we see in the rest of the countries. There are reasons for this. Unlike the other countries Soviet Union emphasised training only through party political machinery.²⁹ Such training to administrative service is not technical or managerial in approach. The party believed that the required training had been already imparted to them by enlisting them in the communist party as a primary party member. Therefore, we are left with a comparative study of training imparted to personnel in the USA, the UK and India. Both India and the UK offer training to their civil servants from a more generalist service requirement in contrast to France and the USA where they impart training for 'specialist' cadre of civil servants.³⁰

Training both in India and Britain are fashioned in such a way as to fulfil the needs of generalists. Unlike France, they generally lack an indepth training in a particular specialised field. In Britain, the Civil Service College (CSC) (1970) imparts training in three main ways:

1. Post-entry training for administrative recruits in economic, financial or social areas of government.

2. Courses in administration and management for specialists.
3. Conducting research into administrative problems.

In India, there are varied types of training for the highest civil servants (IAS). It is conducted by the Lal Bahadur Shastri National Academy of Administration at Mussoorie. The training consists of the following:

1. A foundation course which provides an introduction to the constitutional, political, social, economic, legal, historical, and cultural administrative framework within which the service function (3 months).
2. Winter study tour.
3. One year district training organised by each state government.

One unique feature of the British training institute is that it also organises a wide range of shorter training courses for local government staff, industry, and the lower rungs of the civil service.

While the British training programmes are largely a product of their own tradition and based on the functional requirements of 'generalist' cadre of various departments, the Indian counterpart on the other side still holds the legacy of ICS tradition. Training for IAS officers is more oriented towards emulating the life-style of British officers. They are generally provided with training in riding, shooting, trekking, hiking and other sports activities.³¹ Communication and language proficiency training is also stressed. British attitude over food and table manners, wearing of tie, trousers, shoes are also a part of the general training.

Attendance for lecture classes and for physical training is compulsory. But in British attendance at any or all of the courses is not mandatory. An Indian trainee on the whole spends two years in the training period, but the total period of formal training for British civil servants covers only 22 weeks. In contrast to Indian and British practice, the higher civil servants in France who have job relevant degrees undergo a thirty month course at Ecole National d'Administration (ENA). Half of the courses at

ENA is academic oriented and the rest is of practical experience. French civil servants are also allowed to receive training experience even from private sectors. Training in France, unlike in the UK, the USA and India, starts before recruitment.³²

Non-technical civil service training by Ecole Nationale d'Administration provides the best training for the administrators than its counterparts elsewhere. The total training period is about 3 years and consists of the following packages:

1. One-year practical learning about public administration in prefectural provinces.
2. Specialised training by attending lectures and seminars which are necessarily spent at ENA, Paris.
3. At the end of the second year, the student joins a department of his own option and remains there on probation for 2 or 3 years.

The Ecole Nationale d'administration is attached to the prime minister's office unlike the Indian counterpart Lal Bahadur Shastri Academy of Administration which is attached to the Ministry of Home Affairs and the Civil Service Commission of the British to the Treasury department. However, all these three training institutes have been criticised as elitist and they nevertheless produce civil servants of remarkable quality according to the prevailing socio-economic and political development of the respective countries. They are not static in their approach to the training of the civil servants and have developed an inbuilt capacity to change themselves and the training methods according to the change formulated by the socio-economic forces.³³

The major weakness of training in Britain is largely due to the lack of in service training or indoctrination for specialist groups. In India, the kind of training imparted to the civil servants moulds them into colonial officers in proxy and in fact, they are highly isolated from the rest of the mass. In the same way, a high degree of technical training for the French administration has produced 'technocrats' civil servants without 'human values.'³⁴

In the USA, the Civil Service Reform Act 1978 introduced during Carter's tenure was a landmark in the history of American personnel administration. This act created four important offices under the control of the American president. The offices are:

1. Merit System Protection Board (MSPB) concerned with legalistic concerns of the federal personnel management.
2. Federal Labour Relations Authority (FLRA) concerned with resolution of disputes between unions and the government.
3. Equal Employment Opportunity Commission (EEOC) concerned with providing equal employment opportunities to ethnic minorities in the USA.
4. Office of the Personnel Management (OPM) concerned with recruitment, training and evaluating federal personnel.

In the past OPM role was supervised by Civil Service Commission. The OPM is the largest of these four organisations. It employs about 6,000 employees. France and the USA come closer as far as training is concerned. For instance, there are different schools imparting training for different administrative and non-administrative class in France. In the same way, the various departments in the USA have special and general training for their incumbents. It varies from one department to the other. Overall training supervision and co-ordination are the functions assigned to the OPM. Thus, the USA and France are much oriented towards pragmatic training than Britain and India. There is also the problem of co-ordination and communication in the field of training both in the USA and France. Again in the field of training, the French civil servants are relatively in better position than their counterparts as far as the broad outlook of modern administrators are concerned.³⁵

Economics, mathematics, statistics and quantitative techniques are included in the training programmes at the pre-entry level for the civil servants in France and the USA. Such highly valuable training has been introduced in Britain since 1963 by the Centre for Administrative Studies (CAS). These

features are absent in the administrative training for the Indian Civil Servant. As a result, the administrative training in the UK, the USA and France look more scientific than the Indian training system. However social sciences still occupy an important role in shaping the behaviours of civil servants for general administration of the country.

A managerial approach in the field of training is much in vogue both in the USA and Britain. It is unfortunate that Indian civil servants have not so far been exposed to the world of 'Management Sciences,' particularly in the field of quantitative techniques to measure social and economic development of the country. The Seventh Plan in India focussed the need for an overall reform in training of government personnel. Upgrading training capability, particularly in the context of policy advice, organisation, management of information and manpower planning are some of the important strategies aimed for socio-economic development in the Seventh Plan of India.³⁶ An independent ministry of personnel and training was brought into being in March 1985. This ministry is under the charge of the prime minister and distinctive wings, *viz.*, the Personnel and Training Department and the Administrative Reforms and Public Grievances Department.

In almost every country of our study, except Soviet Union, post-entry training at senior levels is primarily concerned with aiding the civil servants to manage conflicting policies and its related organisational issues. The senior federal civil servants in the USA undergo an eight-week course in order to equip themselves with the knowledge of tackling policy issues. They generally emphasise on various modern management theories, concentration of federal issues, financial relations and any other broad policy matters.³⁷ The potentiality of federal civil servants has been rightly tapped in these training methods. Policy-oriented training for Indian civil service for reasons unknown has not been so far imparted. Policy implementation is much dependent on the practical knowledge of policy-making or participation, however, participation is only allowed on the basis of trust, sympathy to political parties and various other political connections. There exists policy-training in Britain and France.

Administrative traditions in Britain are wary of policy discussions.

Training Institutions

In the UK, training is imparted to civil servants by Civil Service College (CSC). It comprises a headquarter and two regional centres. It was established on the recommendation of Asheton Committee Report. The headquarter is a residential centre at Sunningdale Park. The regional centres are in London (non-residential) and Edinburgh (residential). Most of the training for executive and clerical staff is carried out by departments with some inter-departmental co-ordination, and the CSC gives general guidance and advice. External training in management is provided at the Administrative Staff College at Henley.³⁸ Training for diplomatic service is provided by the Royal College of Defence Studies of London.

The office of personnel management is in charge of imparting training to federal civil servants in the USA. This agency is designed to serve as the president's arm for positive, effective, personnel management. It inherited from the Civil Service Commission (CSC) such managerial functions as responsibility of testing, training and operating retirement. Its headquarter is situated at Washington and has regional offices at Boston, New York, Philadelphia, Atlanta, Chicago, Dallas, St Louis and San Francisco.³⁹ It is headed by a director appointed by the president who is assisted by a deputy director. All the state governments have their own training institutions for the state services and they receive training guidelines from OPM.

- In India, training institutions were under the control of Home Ministry and in 1985, it was separated and now it is under the control of Ministry for Personnel and Administrative Reforms. In the post-independent period, the first training institute was started in 1957, known as IAS Staff College at Shimla.⁴⁰ An amalgamated sister training institution was formed in the year 1959 known as Lal Bahadur Shastri National Academy of Administration. It is headed by a director and assisted by a deputy director. There is also separate training institutes for other services which are as follows:

1. Indian Police Service—Central Policy Training College, Mount Abu.
2. Indian Audit and Account Service—Indian Audit and Accountant Training School, Shimla.
3. Income Tax Service—Income Tax Service School, Nagpur.
4. Railway Staff College, Vadodara.
5. Central Secretariat Service—Central Secretariat Training School, New Delhi.
6. Administrative Service (Middle level)—Administrative Staff College, Hyderabad.
7. Community Development Service—Central Institute of Study and Research in Community Development, Mussoorie.

Apart from these central government civil service training institutions, there are also state government training for state level civil servants. Unlike the practice in the UK, France and the USA, there is systematic training arrangement for clerical employees both in central and state administrative services. In France, the Ecole Nationale d'Administration and Ecole polytechnique are most important training centres for non-technical civil servants and technical civil servants at post-entry

4. Ecole Centrales des Arts et—Manufacturers of upper technical class.

Soviet Russia—A Special Case

The official view maintains that in Soviet Union there were only two classes—the peasantry and working class (industrial labour). These two classes also included within itself, the intelligentsia class which in due course would merge with the working and peasantry class.⁴² Officially, in 1987, the total number of working force was:

1. Industrial and Semi-industrial Workers—61.8 per cent
2. Intelligentsia—23.5 per cent
3. Collective farmers—15.1 per cent.

All were considered to be state workers and were controlled and regulated by various administrative departments. Soviet law however, drew a clear distinction between these types of workers and the persons holding true civil service authorities. This category was much wider because it not only included the administrators in a government department but managers of factories, judges, procurators, bookkeepers, higher local government officers, etc.⁴³

The minister of each department was responsible for personnel policies, recruitment and training. The ministry had many networks throughout the country. The minister for a department in collision with party secretariat would select all personnel administrative, executive, clerical, technical and manual. There was no centralised common institutional arrangement to impart training to various classes of administrative working force. Thus, training was the responsibility of the respective ministries. At the national level, the politburo issued necessary policy guidelines as far as training was concerned. Down the hierarchy appropriate party machinery representatives recruited personnel and there also existed training institutions at major administrative level.⁴⁴

Promotion and Performance Evaluation

The term 'promotion' means advancement moving ahead,

securing greater recognition and status. A promotion is a change of position that involves the assumption of greater responsibilities, a movement up the ladder of authority. It refers to the status structure of organisation and to prestige accorded to various positions. In our ultimate analysis, promotions are changes in rank with some enhanced authority and responsibility. According to Dale Doder, a mere increase in pay or adjustment of compensation is not essential to promotion. He also describes about 'dry' promotion wherein there will be an advance in prestige, authority and responsibility without any accompanying increase in compensation.⁴⁵ Both promotion and 'dry' promotion are part of the personnel system in modern bureaucracies.

Promotion is a tool for motivating civil servants to achieve greater loyalty to the organisation. The sound policy consideration for promotion rests on the following aspects:

1. It is the most important motivational factor in governmental organisation.
2. It is easy for the government to identify the persons for higher position.
3. A promotion involves a chain of posting in an organisation and leaves room for induction of fresh blood from outside on merit recruitment.
4. It reduces the turnover of personnel as well as indiscipline among the staff.

Different Types of Promotion

There are generally, two types of promotion—seniority and merit principle. Seniority principle is the oldest used widely in government services. In this system, the length of service of individual person is taken into account for promotion. It is free from political consideration, favouritism and can be exactly fixed. In merit principle a person's promotion depends on his individual merit, personality, leadership qualities and other factors, but there is also much scope for prejudicial judgement. The merit system is open to severe criticism by others.⁴⁶

Both in Britain and in India, seniority is the primary basis of promotion of civil servants. But in India, there are certain reservation of positions for certain castes such as SC and ST not based on the length of service. At present reservation at the rate of 15 and 7.5 per cent scheduled castes and scheduled tribes respectively exists.

1. Promotion by limited department competitive examination in groups B, C, and D.
2. Promotion by seniority subject to fitness in all groups A, B, C, D.
3. By selection from group B to the lower rung group A and groups B, C and D. In all modes of promotion, where reservation is applicable, 40-point roster is to be maintained to determine the number of vacancies going to the share of SCs/STs.

Besides, there are certain defined categories of the handicapped for which the Indian government has provided reservation in Class III and Class IV posts to the total tune of 3 per cent of the vacancies. It should be noted in recruitment process that there are reservation of job for the handicapped in different countries as follows:

1. France—10 per cent vacancies are reserved for the war disabled. Within this quota-3 per cent vacancies given to civilian disabled.
2. United Kingdom—3 per cent various categories of handicapped.
3. United States—2 to 3 per cent for Native Americans and physically handicapped.
4. USSR—Special reservation for physically handicapped and women in some selected services which range from 5 to 10 per cent.

Reservation in promotion in career civil service is very rare in the USA, the UK, France and the USSR.

In the USA and France, a combination of both seniority and merit principle is followed for promotion. There is a written competitive promotional examination in the USA. Any dispute

with regard to promotion can be referred to the Labour Board. Most of the civil service unions in the USA stress only on the method of promotion by seniority. In France, promotion is affected only within the same corps and there is less scope for promotion unlike the USA, the UK and India where the scope of promotion is not limited but goes well beyond the compartmentalised administrative hierarchy. The restricted scope for promotion in France is due to the fact that each category and corps are classified on a three-fold basis⁴⁷ such as grades, classes and echelons. Each of these grades differs in their authority and responsibility. Promotion of echelon is automatic and mainly based on seniority and to some extent annual rating. A list is prepared every year by ENA and is submitted to an advisory committee composed of an equal number of staff representatives and the representatives of the official side. The committee is empowered to approve the list for promotion and can also solve any conflict of interests in the promotional list. Promotional disputes in India can be first referred to the departmental authorities, followed by Central Administrative Tribunals (CATs) for central administrative services or State Administrative Tribunal (SAT) in case of state administrative services. The last resort of solving the dispute of promotion rests with the Supreme Court of India (both from CAT and SAT). This is an appellate power of the apex body of judicial system in India.

There is also an existence of promotion outside the government organisation to provide bodies which is legally allowed in France. A civil servant can retain his authority of corps and is also empowered to get back his post after serving sometime in the private organisation. But such civil servants may lose their pension rights. Thatcherison (1979-89) strongly favoured such kind of disguised promotion and exchange of public and private pensions at the managerial level.

At the top of civil service administration in the UK, promotions are made on merit but at the lower levels promotion tends to take place in accordance with seniority rules agreed to by the staff union. Such automatic promotion at the lower levels was criticised by Fulton Committee report and suggested

introduction of the system of promotion by merit for the entire system of administration. In similar line of thinking the Civil Service Act, 1978 of the USA wanted a gradual introduction of merit principle in federal civil services as well as administration at the state and the local levels. Administrative Reform Commission (1966) in India also voiced similar viewpoints in some selected administrative departments both at middle and top level.⁴⁸ But it has not been implemented so far and the seniority principle is continued in India in the field of 'pure' administrative services. After the introduction of 'open economy' in India (1990-94) merit principle based on performance appraisal has been gradually introduced in most of the public sector units in order to increase the spirit of competition at the international level.

In the USA there are several ways of appraising performance as per the Civil Service Act of 1978. They are part of a merit pay programme. The performance appraisal of public service employees are conducted by a combination of various techniques. There are self-appraisals, peer ratings, and group or external ratings. A meaningful performance appraisal has not been introduced in India for public services. In a highly stratified society, such appraisal could lead to a lot of prejudices and nepotism. However, the ARC has lamented about the character of the system of performance appraisals, as it existed in the government.⁴⁹

In the USA, promotion of civil servants to the highest position in the federal service is made by officials in the White Office but the president appoints them. The Classification Act of 1949 established general schedule of graded responsibility where one can make use of promotional benefits. The grade ranges from G.S.-1 to G.S.-15. In such grades, there are super grades like G.S.-16, 17, and 18.

1. G.S. 1 to G.S. 4—includes low-level clerical employees.
2. G.S. 5 – G.S. 7—lowest executive echelon.
3. G.S. 8 – G.S. 12—middle management officials.
4. G.S. 13 – G.S. 15—top level career officials.

Automatic promotion is generally restricted within these

major four categories. For super grade promotion the president's approval is required. In the UK, promotions of civil servants are made partly through centrally conducted competitions and partly by departments. In this regard, promotion to most of the highest positions in civil service, for instance, permanent secretaries, deputy secretaries, are approved by the prime minister who is advised in these matters by Head of the Home Civil Service. From 1, January 1986 numbered grades having been introduced at the top of the service have the following appearance in the UK.⁵⁰

- Grade 1 – Permanent secretary
- Grade 1A – Second permanent secretary
- Grade 2 – Deputy secretary
- Grade 3 – Under secretary
- Grade 4 – Executive director
- Grade 5 – Assistant secretary
- Grade 6 – Senior principal
- Grade 7 – Principal.

Automatic promotion based on seniority principle applies to Grade 7 from Grade 4 while a combination of merit based performance appraisals and seniority applies to Grades 3 and 4 for Grades 1 and 2 on purely political and merit consideration.

In contrast to the USA federal polity, Indian federalism (in actual practice it is quasi-federal) offers unique promotional chances for state civil servants. There are nearly 25 per cent of IAS officers being promoted from the state as well as from other central services. Regional level civil servants' promotion to central administrative service is not generally practised as a way of promotion in the UK and France, in lieu of the unitary type of political system.⁵¹

Promotion of civil service employees in the USSR unlike other countries was governed by department as well as the appropriate party machinery. There were general enactments which were contained not only in legislation, but in various directives of the state committees of the council of ministers of the USSR on labour and wages, which generally co-ordinates the problems of promotions and payment. Higher officials were

promoted through firm scrutinisation of the individual commitment to communist political ideologies. The highest administrative officers known as "holders of office"⁵² were further constantly watched and checked in varying frequency by the ministry of finance, procurators, the party and the various commissions or committees of control. Such multiple control and the need for political commitment for promotion was something unknown in other countries. Party membership, conduct record and correct attitudes were additional factors influencing decisions concerning promotions. These factors were applied with even greater force to those who sought promotion within the party apparatus, the "parallel civil service."⁵³

Salary for Personnel

From the point of view of general standard of life in respective countries, the most highly paid civil servant was only from the USSR and the least paid is from India. Even if we compare with other Asian countries like Pakistan and Sri Lanka, the Indian counterparts are less compensated. In India, fixation of salaries for civil servants has been made by several pay commissions constituted by the centre for central civil servants and state pay commission by the state government.⁵⁴ For example, Fourth Pay Commission was setup by the Government of India in July 1983 with justice P.N. Singhal as Chairman. The terms of reference of the Commission included the following:

1. To examine the structure of emoluments and conditions of service, taking into account the total packets of benefits, personnel belonging to all India services and employees of Union Territories and armed forces personnel and to suggest changes which may be desirable and feasible.
2. To examine the variety of allowances and benefits in kind that are presently available to the employees in addition to pay and to suggest nationalisation thereof with a view to efficiency in administration.

The commission took into consideration the prevailing pay structure under public sector undertakings, and state

• governments, etc. The economic condition in the country, the resources of central government and the demands thereon while formulating its recommendations. The terms of references of this commission are wider than those of earlier pay commissions. It recommended 36 scales of pay.

In the United Kingdom, fixation of pay for civil servants is done by appointment of a committee of the Treasury Department. Salary for civil servants since 1971 was fixed on the basis of 'priestly formula' which recommended relatively higher pay scales. It is based on government income policies and by a fair comparison with outside world and private sectors. There is also Civil Service Pay Research Unit in the Treasury Department which may also come with proposals of recommendations. During 1980, the Civil Service Pay Research Unit was abolished and the government appointed Megaw Committee of 1981-82.⁵⁵ It recommended two major considerations:

1. a basis minimum decided in a normal way.
2. housing cost as a supplementary to the pay scale.

The criterion for fixation of pay structure is more simple in the UK and more complex in India. In contrast, France has a rigid formula for salary fixation for its servants and in a flexible approach and relative pay outside the civil service is compared the USA thereby the Bureau of Labour Statistics. Comparability becomes difficult with regional level difference in pay. Pay fixation in recent times is approached managerially. The federal merit pay arrangements for employees in Grades GS-13-15 are based on the employee's performance rating and his other levels of pay.⁵⁶ The other considerations are national income, increased productivity, comparing pay with private sector, nature of tasks and its importance to the public. The managerial approach to pay scale fixation in the USA is a distinctive feature when compared to the USSR, the UK, India and France.

A noteworthy feature of the French system of pay fixation is the introduction of a general grid in 1948. Each post is given a fixed index number (Indice) on the grid. Salaries are calculated

Comparative System of Pay Fixation

<i>Contry</i>	<i>Pay Control Department</i>	<i>Pay Recommending Department</i>	<i>Principles Adopted</i>	<i>Nature of Pay Fixtion</i>
USA	Office of Personnel Management	Bureau of Labour Statistics	1. Comparability 2. Standard of Life 3. PSP Party	Management neither flexible nor rigid
UK	Treasury and Personnel Department	Civil Service Pay Research Unit/ Megaw Committee	1. Comparability 2. Party with PSP 3. Basic Minimum HRA	Simple and marching towards, managerial approach
France	Ministry of Finance and Personnel Department	Enactment of Grid System, 1948	Differences of Indices, numbers, and the existing salary	Rigid
India	Ministry of Finance	Pay Commissions Approach by Prime Minister	Private Index Resources of Government PSP Difference	Flexible
USSR	Union Ministry of Finance	Political Party Marchinery/Committees	Standard of Life Output Efficiency	Political Decisions

PSP = Private Sector Pay.

HRA = Hosing Supplement.

on the basis of differential set by these numbers. Indices are expressed in figures, except for the very top post. The highest salary is generally about eleven times the lowest. One defect of the grid system is that it never included the allowance along with the grid. In fact, allowances are calculated on a flat rate. Fixation of allowance in the USA, the UK and India are based on the prevailing price index. Thus, in France salary may increase as per dictates of indices (price-index) but allowances on the basis of flat rate to different sales of pay. The table (given on p. 184) provides a comparative system of pay fixation.

The theory of public service has been in practice since a long time. In fact, pay is not a remuneration for the actual work done, but a salary given to enable the civil servant to maintain his status and make him attached to the organisational interests. Irrespective of the nature of political administrative system, payment to public servants is more influenced by economic factors. It is primarily dependent on the economic pressures and the collective bargaining strength of the various trade unions. Invariably, almost every country negotiates with the staff unions in order to find a compromise formula between the government and the public servant. However, both the USA and the UK, since the beginning of 1970, planned to reduce the spending on public service salaries.⁵⁷ Privatisation has been on the fast move both in the USA, the UK and India. Of all the countries, India has allowed the highest share of budgetary allocation for public servant payment and the least is by the United Kingdom.

Retirement Benefits

Tenure system in public services are of three kinds. They are:

1. A fixed term of years or on attaining maximum age for retirement.
2. At the will of the appointing officer.
3. For life.

Almost in all modern democratic countries, retirement benefits like pension become a legal right and countries are different only in fixing the age of retirement and other benefits that are associated with retirement. Normally, retirement age

is fixed on the basis of life expectancy on an average as well as on other administrative, socio-economic factors. For instance, in highly populated countries like India, the retirement age can be considerably reduced for certain administrative jobs. A less populated state may fix the retirement age at the maximum.⁵⁸

In France, the retiring age for a civil servant is fixed at 60 years, 58 years in India, 65 in the USA, 60 in the UK and in the USSR it is 60 years. There are certain services in the USA for which the retirement age is 70 (Judges of Federal and State Courts). In India, for Supreme Court Judges it is 65 years and for High Court Judges it is 62 years. To qualify for pensionary benefits different yardsticks are applied in these countries.⁵⁹

France

1. Pension calculated as a proportion of the last salary received.
2. Those who worked for 30 years will receive half the salary received last.
3. Those who spent 40 years in service will receive two-third of the salary received at the time of retirement.
4. To qualify for pension, a minimum of 15 years must have been spent in service.
5. Pension amount increases automatically when there is a pay increase in the civil service.
6. The widow of the pensioner will receive half the pension.
7. Children of the demised pensioner will receive 10 per cent of the pension amount till they attain 21 years of age.

United Kingdom

1. Civil service pensions have been governed comprehensively by non-statutory (superannuation act) enabling act. Therefore, it is possible to make any change pension without further legislation.
2. Ten years minimum service is required to receive pension.

3. A civil servant is eligible to receive an annual pension of one-eighth of his average salary over the last three years of service.
4. Temporary civil servants who have served five years or more are eligible to receive a lump sum quantity.
5. No. contribution is made by a civil servant towards his pension.
6. Widows and children of the pensioner will get pensionary through contributory scheme.
7. Superannuation benefits are the same for men and women, except that an established women civil servant who chooses to resign on marriage after not less than six years of reckonable service may be granted a marriage gratuity of one month's pay for each completed year of her established service, subject to a maximum of 12 months pay.⁶⁰

India

1. Pension is related to the length of qualifying service rendered by the civil servant.
2. Pension is calculated on the average of the emoluments drawn by him during ten months immediately preceding the date of retirement.
3. Full pension is admissible to a civil servant who retires after completing 33 years of qualifying service. The amount of pension is determined at 50 per cent of the average emoluments subject to a maximum fixed by the latest pay commission.
4. Proportionate pension is admissible after completing 10 years of qualifying service.
5. Family pension is payable to the family of an employee on his death in service/after retirement on monthly pension. There are three kinds of percentage fixed for different pension amount (30% – 20% and 15%).
6. Pension will automatically increase after the pay increase of the civil service.

USSR

1. Pension benefit covered not only the civil servants but the entire working force of the USSR.
2. For civil servant the pension benefits were very sound.
3. Equal pension is given for both men and women.
4. Compulsory 30 years of service is required for pension benefit.
5. Pension was usually determined by various departments on various criteria.

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