A Comparative Approach to Study the Electoral Systems of Selected Countries

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Abstract

Election is considered as one of the indicators of political development and interpreter of the people’s role in the government. According to the significance of voting system in the participation of people and the way they trusting the government, in this research the principle meanings and structures of voting systems has been compared among American, British and Iranian electoral system. Some main criteria for comparing includes: Qualification of Overseas Voters, Who/what may be voted, Voting Method, Voting Period, Deadline for Receipt of Ballots, Voting Statistics.

Keywords: Electoral Systems, Voting, Criteria for Comparing the Electoral Systems.
1. Introduction
A voting system or electoral system is a method by which voters make a choice between options, often in an election or on a policy referendum. A voting system enforces rules to ensure valid voting, and how votes are counted and aggregated to yield a final result. Common voting systems are: majority rule, proportional representation or plurality voting with a number of variations and methods such as first-past-the-post or preferential voting. The study of formally defined voting systems is called social choice theory or voting theory, a subfield of political science, economics, or mathematics. Electoral rules, its implementation and people’s turnout in election represents the relationship between governments and people and draw social constitution (Saeli, 2000). The Choice of Electoral System is one of the most significant institutional decisions for any democracy. In many cases the choice of a particular electoral system has a profound effect on the future political life of the country concerned, and electoral systems, once chosen, often remain fairly constant as political interests solidify around and respond to the incentives presented by them. However, while conscious design has become far more prevalent recently, traditionally it has been rare for electoral systems to be consciously and deliberately selected. Often the choice was essentially accidental, the result of an unusual combination of circumstances, of a passing trend, or of a quirk of history, with the impact of colonialism and the effects of influential neighbors often being especially strong (Reynolds et al., 2008). Election is a series of operations that has been devised in order to the selection of rulers to appoint observers to control the power. From this perspective, election means techniques of selection and different ways to select representatives. Although, signs of involvement of the people occasionally were seen in selection of officers in ancient times, but it must be said that the idea that considers the selection techniques as the most legitimate and lawful means of collecting power and the most common way of applying people's volition is a new issue, because before this, leaders of communities were seen as a natural coming things like climate, diseases, color and shape of people, who was not selectable, leaders also were imposed by a force out of people’s volition. The idea of the paranormal sovereignty with common root and more or less distinct forms were prevail in most parts of the world (Alaee & Abbasi, 2014). In this research the principle meanings and structures of voting systems has been compared among American, British and Iranian electoral system.

2. Principal electoral systems explained
2-1. An historical overview
Given the plethora of different electoral systems in operation throughout the world, it is difficult to escape the conclusion that each one ultimately is the product of particular national circumstances, of the whims of particular actors. It is possible to identify three main waves in the choice of electoral system, which correspond closely to Samuel Huntington’s influential thesis on the waves of democratization (Huntington, 1991). The first wave, from the 1820s to the 1920s, featured the processes of democratization in the USA and across much of Europe. The second wave was a phenomenon of post-Second World War decolonization and the rebuilding of democracies such as West Germany. The ongoing third wave, starting in the 1970s, features the burgeoning new democracies of Latin America, southern Africa, Central and Eastern Europe and the former Soviet Union.
In the cases of first wave democracies, the electoral systems emerged gradually, very much in line with the gradual evolution of the democracies themselves. Two broad patterns are apparent: first, there are the cases of Anglo-American democracies with relatively homogeneous societies and characterized by a single partisan cleavage and a simple two-party system. There was a desire by the established elite to retain maximum hold over the system, seeking to constrain the influence of minor groups and parties. Relatively early on, there was a focus on territorial links, tied in with the desire of local elites to hold on to their power bases. Once these countries had settled on Single Member Plurality (SMP) systems, which emerged as their favorite, there was little desire for change. Rather, attention was focused on questions regarding constituency boundary divisions and the gradual reform of electoral administration.

A different pattern occurred in the early continental European democracies, which tended to be characterized by more plural societies with no single dominant group. In these cases, the need to accommodate different groupings in the political system was recognized early on. Consequently, at the turn of the twentieth century a shift towards electoral systems based on lists often having a proportional representation was noticeable in this region. The writings of prominent scholars like Victor D’Hondt and André Sainte-Laguë influenced and supported this development.

The second wave was much shorter. It is focused on the post-war decades, which saw decolonization and the reestablishment of some democracies. Two central features of electoral system design in this wave were colonial inheritance and external imposition. There is a clear regional pattern in the selection of electoral systems, which coincides with historical colonial links. For instance, 37 out of the 53 former British colonies use SMP. It is also worth noting the influence of British electoral reformers in the adoption of Single Transferable Vote (STV) in some other former British colonies over the years, e.g. in Malta. Meanwhile, a significant number of francophone countries use the French two-round system, while many of the rest use Proportional Representation (PR) lists, also used in some elections in France. Former Spanish and Portuguese colonies tend to use list systems. Obviously the electoral systems adopted in many former colonies were not always appropriate to meet the needs of the particular country, as the colonial power was usually very different socially and culturally from the society colonized.

In other cases electoral systems were imposed on a country by an external power intentionally, in order to meet a specific purpose. The best example of an electoral system design resulting from such external imposition is post-war West Germany. The allied powers played an important role in the adoption of a mixed system (MS), which had two purposes. On the one hand it was designed to avoid the apparent mistakes of the Weimar period, when extreme proportionality was said to have influenced the instability of the political system. On the other hand, the mixed system incorporates some of the supposed strengths of the Anglo-American constituency-based system.

The ongoing third wave of democratization has produced new patterns of electoral system adoption. A central feature of this wave has been conscious design. This wave has seen a new appreciation of the necessity for and utility of well-crafted electoral systems as a key constitutional choice for new democracies. We can refer to the cases of democratic transition in Hungary, Bolivia, South Africa, Korea, Taiwan and Fiji, among a host of other cases, where there has been extensive discussion and debate about the merits of particular electoral systems. But it has to be remembered that many of these third wave democracies are far from completing
the process of democratization and therefore further electoral reform in the future cannot be ruled out (Norton, 2002).

Electoral reform in established democracies used to be a rarity. For a long time only France was an exception and seemed to be prone to fairly regular changes to its electoral systems; there were few other cases. It is difficult to establish exactly what caused electoral reform to be high on the political agenda. In a review of the debates in Israel, Italy, Japan, New Zealand and the UK, the researcher Pippa Norris discerned long-term factors which these countries have in common and which, at least in part, appear to have played a role in triggering demands for electoral reform: (1) electoral change, and in particular the weakening of electoral alignments; (2) political scandals and/or government failures which rock public confidence in political systems; and (3) the ability of voters (in Italy and New Zealand) to use referenda to force the hands of politicians (Norris, 1997).

Some scholars (Dunleavy and Margetts, 1995) suggest that the specific motivation for change is influenced by the nature of the existing electoral system and distinguish among factors at play in plurality rule countries (majoritarian systems) and proportional representation systems (PR) countries. In the case of plurality countries, the process of electoral change and the rise of new parties increased the disproportional tendencies of the electoral system. The SMP system can operate quite proportionally in a two-party system, such as in the USA, but when the party scene becomes more fragmented (as for example, the increasing votes for the Liberals/Liberal Democrats in the UK), the inherent disproportional tendencies of this electoral system become very evident. In PR countries, the push for electoral reform can have different roots. Here, by definition, there is less concern about the proportionality of the system. There is instead a concern about accountability and parliamentary representation, relating either to the large electoral districts in PR list systems, or the excessive degree of party control over the candidate lists.

The following sections outline the core principles and debates surrounding the main varieties of majoritarian, proportional and mixed electoral systems (the Inter-Parliamentary Union paper, 2005). They are by no means an exhaustive guide, but provide sufficient background information to enable a good understanding of the terminology and systems featured in the electoral system tables of Parts Two and Four of this paper.
2-2. Majoritarian (plurality) systems

Plurality (majoritarian) systems represent the oldest and simplest electoral system category, based on the principle that whichever candidate receives the most votes in a constituency is deemed elected. Its prime concern is with the creation of effective government. The following three varieties of majority systems operate on the basis of single-member constituencies, based on the simple rule that only one representative is elected in each electoral district: (a) the SMP (Single Member Plurality System), also called “first-past-the-post” (FPTP) or simple majority (in Canada, India, the United Kingdom and the United States of America); (b) the two-round system (2RS), also known as the double-ballot or run-off system (in France); (c) the alternative vote (AV), also known as instant run-off (in Australia and in Ireland for presidential elections).

Single Member Plurality System (SMP), also called “first-past-the-post”

The SMP can be seen as the simplest and most straightforward method of filling a single seat. To win, a candidate need only receive a plurality of the votes - that is, more votes than any of the other candidates running in the same electoral district. The winner does not need to receive a majority of all votes cast.

This system is clear and straightforward, but it can also result in the election of candidates whose support does not reflect the overall votes cast at the election. In other words, it can produce parliaments in which the distribution of seats does not reflect well the political preferences of the electorate as a whole. In addition, some voters may be convinced that there is no point voting for their preferred candidate, since that candidate has no realistic chance of being elected. Such voters may fear their vote will be wasted and may conclude that it makes better sense to vote strategically for a candidate they favor less, but who has more chance to win (Norton, 2002).
The two-round system (2RS)
This system, also known as the double-ballot or run-off system is also based on single-member constituencies, but it requires a candidate to obtain one more vote than half the votes cast in order to be elected. If no candidate achieves that many votes, a second round is held. In this system, an absolute majority is sufficient in the first round, otherwise a “run-off” election is held between the two candidates who received the most votes in the first round. The two-round system (2RS) is more widely used at presidential rather than parliamentary elections. Winning the absolute majority of votes in the first round is sufficient to be elected, otherwise a second round, also called a “run-off”, is held, usually between the two candidates with the best results from the first round. One of them then goes on to receive the absolute majority of votes (unless there is a tie) in the second round and is declared the winner. Other variations of the two-round electoral systems also exist (Gallagher and Mitchell, 2008).

The Alternative Vote (AV)
This system also seeks to ensure that a candidate is elected by an absolute majority, but does so in a single round using Preferential Voting (i.e. expressing a rank order of preferences) instead of the two-stage system. Rather than simply indicating their favoured candidate, under AV electors rank the candidates in the order of their choice, by marking a ‘1’ for their favourite, ‘2’ for their second choice, ‘3’ for their third choice and so on. The system thus enables voters to express their preferences between the candidates rather than just their first choice. It is used in Australia and also for the Irish presidential elections. Constituents vote for a single candidate but indicate, in descending order, their preferences for other candidates. If none of the candidates gets an absolute majority on the first count, the candidate who polled the fewest votes is eliminated and his or her votes are transferred to the other candidates in accordance with the second preferences marked on each ballot paper. This is repeated until one of the candidates has an absolute majority. The vote counting process may thus require several stages. The example below, from the Irish presidential election of 1990 (Gallagher and Mitchell, 2005) illustrates how this system works. The first preference votes cast were as follows:

2-3. Proportional Systems
Proportional representation (PR) systems are currently the most widely used in Europe. Their major intention is the creation of a parliamentary chamber which accurately reflects the diverse make-up of the electorate. However, as noted by scholars, “systems of proportional representation differ from each other in nearly every way conceivable” (Eckstein, 1964). The major categories of the PR systems are the List Systems and the Single Transferable Vote. Proportional representation systems (PR) require multi-member constituencies. Therefore, the number of seats in a constituency, also known as district magnitude, is very important as it can affect how accurately the results of the elections reflect the political preferences of the overall electorate. Under a PR system, district magnitude may be of any size. The bigger the district magnitude, the more proportionate are the election results. The ‘full PR’ system considers the whole country as a single constituency, with seats allocated on a pro rata basis according to the number of votes cast. This is considered to yield the most ‘pure’ form of proportional representation. “Limited PR” systems see elections taking place in several constituencies, and are considered to not produce as accurate a snapshot of the population, since the greater the number
of constituencies (and hence the fewer the number of seats available per constituency), the harder it is to ensure complete proportionality.”

**List Systems**

Under these systems, each party presents a list of candidates, and voters can choose between political parties, individual candidates, or both. Therefore, it is not just about dividing the seats among parties but also deciding which individual candidates will occupy those seats. The extent to which a voter can have choice in a party list PR system varies. The two most commonly used list systems are the “closed list” system and the preferential system. In a closed list system, the sequence of candidates on the list is determined by the party during the candidate selection process and voters cannot change it. If, for example, a party wins four seats in a particular constituency, those seats go to the top four candidates on its list. Preferential voting, on the other hand, allows voters to express a preference for one or more candidates on the list. The aggregate voter preferences decide the final order of the list, which may end up being different from that initially indicated by the party. The initial order of the lists is established by the political parties and the power of voters to change this order vary a lot in different preferential voting systems (Gallagher and Mitchell, 2008).

In some cases this voter power is significant, while in others a very high degree of coordination by voters is needed to overturn the initial order on the lists. In some preferential vote systems, voters have the right to indicate only one preference, while in others they may indicate more preferences, which can be as high as the number of seats to be filled in the respective electoral district. Where voters have many preference votes, they are usually confined to just one party list when casting them. Switzerland and Luxembourg are exceptions in that they practice the so-called “panache”, allowing voters to cast their votes for candidates from different party list (ibid, p. 590).

Once the votes cast for each list have been added, seats are allocated among the parties according to a particular formula as explained further.

**Seats Allocation Methods**

The seat allocation methods PR list systems can be classified as “highest average” methods or “largest remainder” methods. In the highest average methods, in order to get a seat, parties must have the highest averages after the votes they received are divided by a particular sequence of numbers. In the largest remainder methods, a quota that is a number of vote’s necessary for the allocation of one seat, is established. Some academics have tried to show that one of the two types of seat allocation methods yields more proportional results than the other, but A. Lijphart finds that this is not the case and that all depends on the specific details of each formula (Lijphart, 1990).

2-4. Mixed Systems and other systems

The twofold classification of electoral systems as majoritarian or PR - has recently been judged insufficient, given the recent trend to combine the two elements, especially in new democracies. Pippa Norris has instead suggested a different, threefold classification: majoritarian (further distinguishing between plurality and majority systems), proportional representation (further
distinguishing between list systems and the single transferable vote), and ‘combined’ systems (Norris, 2004). Yet it has become more common to refer to such combined systems as ‘mixed’, as they involve ‘the combination of different electoral formulas (plurality and PR or majority and PR) for an election to a single body’ (Massicotte and Andre, 1999). In the mixed systems a further distinction is made between “parallel” and “compensatory” systems. In the mixed parallel systems, election results are calculated independently in each system component (majoritarian and PR), while in the compensatory systems, the results in one component are taken into account when calculating the results in the other component (Gallagher, 1992).

Mixed electoral systems are very varied and can produce different results. It is possible theoretically to put together in various combinations any of the methods described above. In practice however, mixed systems usually involve electing some MPs from single-member electoral districts (constituencies) and other MPs from lists. In addition to the systems referred to earlier, some countries apply electoral systems which can be described as somewhere between the proportionality of PR and results offered by plurality/majority systems. A typical example is the Single Non-Transferable Vote (SNTV), which is used in Japan (Lijphart and Grofman, 1984).

The SNTV system has the advantage of simplicity: several seats are filled in each electoral district; voters cast their votes for individual candidates, not for party lists; the seats in each district are then allocated to those candidates who received the most votes. For example, in a three-seat electoral district the top three candidates with the most votes are elected. At first glance, SNTV bears similarities to the SMP system, the key difference being that in this case we have multi-member electoral districts. SNTV is not a proportional system, since formally it is not concerned with allocating seats among parties proportionally to their electoral support. In practice however it delivers outcomes that are relatively proportional and it is often called a semi proportional system. Researchers comment that an advantage of this system is that it provides an incentive to both parties and voters to engage in strategic behavior (Gallagher and Mitchell, 2005). Parties have to make calculations about their likely support in order decide to how many candidates to put forward in each district. For instance, if a party fields two candidates in an electoral district where it does not have enough support to get both of them elected, it risks seeing its vote split and both candidates may lose, leaving the party with no seats at all from that district. In other cases, if a party has a very strong and popular candidate who is likely to get far more votes than is necessary to be elected, the party may encourage part of its supporters to switch their vote to other party candidates in the same district. However, this balancing of the vote also entails risk. Voters, on the other hand, have an incentive to evaluate whether their preferred candidate has a realistic chance to be elected and may move their preference to someone they believe has a better chance (Norris, 2011).

3. American, British and Iranian elections
There are many obvious differences between the national/general elections held in both America and Britain but there are also some major similarities.
A British Prime Minister can call an election at any time in his 5-year term. In theory, he can use good economic news, for example, to boost his party’s representation in Parliament by calling a snap general election hoping that voters will be swept along by such good news. It is said that
Harold Wilson, the Labour Prime Minister in the 1960’s-1970’s used this feel good factor after England won the World Cup in 1966.

The US President has no such flexibility. The date of each US national election is set in stone and the President goes into it on the back of whatever news is around at the time – be it good or bad. He cannot call an election – as it has to take place in the first week on November. The next US national election is on the first Tuesday in November 2008 and there is nothing the Republicans or G W Bush can do about this. Iran elects on national level a head of state and head of government (the president), a legislature (the Majlis), and an "Assembly of Experts" (which elects the Supreme Leader). Also City and Village Council elections are held every four years throughout the country. The president is elected for a four-year term by the people. The Parliament or Islamic Consultative Assembly has 290 members, elected for a four-year term in multi- and single-seat constituencies. Elections for the Assembly of Experts are held every eight years. Mayors will be elected by popular vote for the first time in 2013. All candidates have to be approved by the Guardian Council.

The US has an election every 4 years – the UK every 5 years maximum and in Iran it is for every 4 years as same as US. The UK’s Prime Minister can serve any number of years. The US President is limited via the Constitution to two four-year terms – a maximum of 8 years as happened in Iran as the same. Though the Constitution can be amended, there has been no evidence in recent years that there will be any such change to this part of the Constitution. Even if the two countries populations are made into a comparable proportion, the amount of money spent during an American national election dwarfs the money spent during a UK general election. For the UK 2001 general election, political pundits spoke in terms of tens of millions being spent in total by all parties. In the 2004 American election, pundits spoke in terms of hundreds of millions of dollars being spent – possibly even a billion dollars. One of the main reasons for the above is the difference in duration of the two campaigns. In the UK, Tony Blair announced the 2005 general election for May 5th on April 5th – leaving just one month for campaigning. In America, the election campaign starts in January in the year of the election with primaries and caucuses, leaving 10 months until the actual election. In America, the national election is between two candidates – a Republican one and a Democrat one. (Other candidates do stand but they have no chance of being elected) Voters vote for a candidate. In the UK there is a totally different approach. There is a vote for all 646 constituencies (2005 figure) and voters will probably vote for a party rather than for a candidate. In America, the opportunity for a protest vote barely exists – unless you deliberately abstain. The Reform Party and Green Party do exist but the Electoral College system means that they have no chance of getting any form of power.

In the UK, there are plenty of opportunities to have a protest vote against the standing party/Prime Minister. The election of Michael Bell as an Independent anti-corruption MP in 1997 showed this. In 2001 an Independent candidate won Wyre Forest as the Kidderminster Hospital and Health Concern MP – his manifesto was based solely on keeping open the local hospital whatever the cost. He received the support of the local populace and became that constituency’s MP. The system in America does not allow for this at presidential level – though it does happen at Congressional level, especially in the mid-term elections. Turnout at both national/general elections is poor. In both 2001 (UK) and 2004 (US), 1/3rd of those who could have voted did not. The announcement of an election in the UK in April 05 was described in one
British broadsheet as “the lull before the lull.” The UK’s electoral system is based on the first-past-the-post system. All the winning party needs is a majority of MP’s elected to Westminster to win a general election. For 2005, all the winning party will need is 324 MP’s to have an overall majority in Parliament. In America, some say that there are 50 elections as opposed to just one. Whoever wins a state, gets all of that state’s Electoral College votes and the loser gets none. Once a presidential candidate gets a majority of Electoral College votes, he is declared the winner even if some states have yet to declare. In 2000, Bush won with fewer public votes but with a majority of Electoral College votes. The same oddity has happened in the UK. In 1951, the Conservatives won the general election with 11.62 million votes (including National Liberal and Conservative MP’s) while the Labour Party got 11.63 million votes. However, the Conservatives won 259 seats in Westminster to Labour’s 233.

4. Conclusion
A country’s electoral system is the method used to calculate the number of elected positions in government that individuals and parties are awarded after elections. In other words, it is the way that votes are translated into seats in parliament or in other areas of government (such as the presidency). There are many different types of electoral systems in use around the world, and even within individual countries, different electoral systems may be found in different regions and at different levels of government (e.g., for elections to school boards, city councils, state legislatures, governorships, etc.). Based on the importance of voting a democratic society, in this research we compare three selected countries including USA, UK and Iran. The summary of comparison, shown in the table 1. It is shown that in some aspects, the electoral system of Iran is nearer to US system rather than UK system.

Table 1. A Comparative Study of the Overseas Voting Laws and Systems of Selected Countries (Rojas, 2014)

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<td>UK</td>
<td>A citizen, age 18, and a registered voter in UK within the last 15 years.</td>
<td>Members of Parliament, Representatives to European Parliament, local and devolved assembly elections</td>
<td>Postal voting, Proxy Voting</td>
<td>From receipt of postal ballot, Election day</td>
<td>10:00 p. m. of election day in U.K.</td>
<td>N.A.</td>
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<td>USA</td>
<td>A citizen, age 18, and a registered voter</td>
<td>General, special, primary and runoff elections for federal offices such as the Office of the President, Vice President, or of Senator or Representative in, or Delegate or</td>
<td>Postal voting, Fax voting, E-mail</td>
<td>From receipt of postal ballot</td>
<td>Subject to State laws; up to 15 days after election in some States</td>
<td>37 %</td>
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<td>Country</td>
<td>Eligibility</td>
<td>Types of elections</td>
<td>Voting Method</td>
<td>postal ballot reception</td>
<td>Duration</td>
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<td>Iran</td>
<td>A citizen, age 18, and a registered voter</td>
<td>Presidential election, local elections, parliamentary election, Assembly of Experts election</td>
<td>Classic method of paper ballots</td>
<td>From receipt of postal ballot</td>
<td>Most of the time until 10:00 p.m. but it last to 00:00</td>
<td>72.7%</td>
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References


