The Law and Practice of Vote of No-Confidence Against Prime Minister: A Comparative Study of United Kingdom, India and Pakistan

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Abstract: The ouster of Imran Khan as prime minister in Pakistan sparked a significant academic and public interest, thereby requiring an in-depth investigation into the law and practice of vote of no-confidence. Therefore, this comparative study critically examines the utilization and implementation of this constitutional mechanism and instrument in the parliamentary democracies of the United Kingdom and her former colonies India, and Pakistan. While infrequently employed in the recent historical journey of the democracies in the UK and India, this motion has gained center stage in Pakistan, mostly due to the historic overthrow of the government of Pakistan Justice Movement party called The Pakistan Tehreek-e-Insaf or PTI in 2022. The PTI was founded and led by the cricketer-turned politician Imran Khan. Another dramatic motion of no confidence happened in Punjab provincial assembly of Pakistan. The use of no confidence motion was relatively infrequent in the early history of Pakistan compared to the relatively frequent use in early Anglo-Indian parliamentary history. The study found that in Pakistan, no confidence motion was a recent option where governments went packing through martial law or presidential powers. The study also found that philosophically the notion of collective responsibility inherent in the vote of no-confidence strengthens party politics and the opposition. Moreover, it was established that emerging parliamentary democracies lacking a robust democratic culture require comprehensive and stringent anti-defection laws to combat corrupt practices such as horse-trading. Thus, the motion is more of a boon than a bane in the Indo-Pak political context. It may also trigger instability in developing countries like Pakistan and India. The study acknowledged the pivotal role played by the Supreme Court of Pakistan in the landmark Suo Moto Case No. 1 of 2022. This judgment successfully averted a constitutional crisis and marked a significant milestone in the country's democratic development. Furthermore, a comparative analysis reveals that initiating a vote of no-confidence is comparatively more challenging in Pakistan than in India and the United Kingdom. This research further sheds light on the complexities and variations surrounding the parliamentary mechanism of vote of no-confidence, offering insights for scholars and policymakers alike especially taking the British and Indo-Pak parliamentary context.

Keywords: Vote of No-Confidence, Anti-Defection Law, Pakistan, India, UK

1. Introduction

The research topic explores the elaborate systems of votes of no-confidence against prime ministers in similar yet different political landscapes, focusing on the United Kingdom, India, and Pakistan. The political systems are

similar as all three are parliamentary and have Westministerian background. The three political systems are different too as the British system is conservative, the Indian political system has dynastic or populist tendencies while the Pakistani political system has developed into a hybrid regime of civilian administration masking a powerful military establishment after bouts of direct military interventions. This study digs into the legal frameworks, constitutional intricacies, and procedural nuances surrounding motions of no-confidence, aiming to unlock the underlying principles governing these rare yet important political processes in parliamentary democracies. By conducting a thorough comparative analysis, the research endeavors to offer unique insights into the functioning of democratic systems, utilizing case studies and legislative histories to provide a holistic grasp of the challenges posed to the leadership of a nation's highest executive office.

The researcher's selection of the thesis topic was motivated by the profound societal impact of the vote of no confidence in Pakistan against Imran Khan. The episode was extensively covered by both mainstream and social media in 2022. In Pakistan, the lack of both legal expertise and media ethics within the commercialized media sphere of Pakistan led to significant confusion and dissemination of misinformation regarding the legal framework and operational aspects of the no-confidence vote in Pakistan. This led to different people creating their own reality and so called facts about the events. Many people, especially those who supported Imran Khan or had sympathies with him due to the narrative of Western conspiracy, saw the vote of no confidence as an illegal action by the so-called corrupt mafia and foreign intervention in their country and self-determination. It nearly precipitated a political crisis in Pakistan. Accordingly, this study endeavored to elucidate the legal intricacies surrounding the no-confidence vote while undertaking a comparative analysis with the UK, recognized as the mother of parliamentary system of democracies, as well as Pakistan's twin neighbor India, which claims to be the biggest democracy in the world.

A vote of no-confidence, often referred to as a motion of no-confidence, represents a parliamentary procedure used in democratic systems especially parliamentary democracies to test the extent of majority support for government officials, usually the Prime Minister, although it may extend to ministers or speakers as well. Should the Prime Minister face a lack of majority support, they often historically speaking may opt to give their resignation prior to facing a serious no-confidence motion. It is crucial to distinguish the no-confidence vote from other types of voting mechanisms that express disapproval towards or criticize the actions of a government, as a successful no-confidence vote can lead to the sendoff of the Prime Minister from his or her office which is not the case with the usual criticism in the floor of the house against the government policies in the parliament (Parliament of Australia, 2016).

The underlying philosophy forming the basis of no-confidence vote posits that an office holder in the parliament, mostly the Prime Minister, has lost the confidence and the support of the parliament and therefore the peoples' representatives. In a democratic setup, government officials are said to be answerable to the parliament, which must be responsible to the parliament of the nation in order for the cabinet's ability to govern the nation (Global News, 2019). The practice of the no-confidence vote as a political convention originated and evolved into the UK and its House of Commons. The British system has been adopted as a convention in Canada, devoid of specific regulations. Occasionally, the contentious, controversial or important bills introduced by the cabinet are subjected to a confidence vote. Should such bills, especially money bills fail to get through parliamentary approval, the opposition in the parliament may initiate a no-confidence motion with the aim of ultimately a change of power within the government (Parliament of Canada, 2019).

In the event of a successful no-confidence vote, the head of government - The Prime Minister - must either resign before contesting the vote to avoid embarrassment or even may go as far as seek and request the intervention of the head of state, such as the President or Constitutional Monarch, to dissolve the parliament and pave the way for a new general election. However, the head of state such as the President or the King may decline to dissolve the parliament or call for an early election if an election has taken place recently or if they anticipate another parliamentary leader to secure a majority being a viable option (Dangerfield, 2017; Mcgregor, 2012).

The dynamics of no-confidence motions vary across nations, exemplifying diverse mechanisms for evaluating governmental support within parliamentary systems. Distinct countries exhibit varying requirements and procedures for the execution of a no-confidence vote. For instance, in Denmark, it transpired only three times during the 20th century and has not occurred since 1975 (Danish Parliament, 2022). In the European Union, a vote of no-confidence necessitates a two-thirds majority within the European Parliament to dismiss the European

Commission. In Greece, one-sixth of Parliament members initiate the process; Ireland dissolves Parliament upon a successful motion. Italy demands approval from both houses within ten days, while South Africa's President, ousted by a successful vote, sees the Speaker assume the acting role. Sweden permits motions against Ministers, with the ousted Prime Minister potentially acting until a new election. Russia grants the President discretionary powers post-no-confidence, potentially leading to cabinet dissolution or parliamentary elections. In the UK, failure to pass a supply bill triggers a no-confidence scenario, but censure does not oust the government. Historic UK instances are rare, marked by budgetary failures. India's Lok Sabha requires fifty members for a no-confidence vote, historically witnessed in the defeated motion by J.B. Kripalani. Pakistan extends the mechanism to various officials, with a 20% member support prerequisite. In essence, no-confidence votes serve as a nuanced accountability instrument, their procedures and repercussions intricately varying in global political landscapes (European Parliament, 2022).

1.1 Practical Implications

This study has huge practical implications for policy makers by looking at a narrow legal issue from a broad spectrum and studying it with in-depth analysis. After investigation, the research advocates for enhanced legislative checks and balances on horse trading and a vigilant state mechanism for a smooth and transparent as well as a non-chaotic no-confidence vote mechanism. Instability and corrupt practices such as horse trading poses a significant threat to democracy especially to developing ones like Pakistan and India. We can learn from the more resilient British system. Calling Article 63-A in the Pakistani constitution as insufficient, the study recommends the establishment of an empowered, independent, and fair Election Commission to ensure a corruption-free process for no-confidence and confidence votes in Pakistan. Such measures can avoid a political catastrophe.

Furthermore, the study proposes that Governments around the world should take pre-requisite Vote of Confidence from Parliament before presenting crucial legislation or policies. This practice will be very stabilizing in Pakistan. It can help avert the embarrassment of a successful no-confidence vote, especially in the case of a vulnerable coalition government. The study also suggests allocating the premiership seat to the party with the most seats (always in the parliament). It is not only ethical in a democracy but it is the democratic right of the party winning most seats. The research is against subversive and undemocratic practices during no-confidence motions. The study fears that such measures may result in a democratic crisis and reverse the already slow democratic evolution in Pakistan. It calls on key figures like the Speaker, Prime Minister, and Leader of the Opposition as well as other stakeholders like the Military Establishment to avoid unconstitutional actions and strategies before and during parliamentary proceedings. The study proposes strict penalties like lifelong bans and imprisonment rather than mere party or House member cancellations in Pakistan. A much more mature democracy in India can be undone if a vigilant civil society does not check totalitarian domination of one party over others.

Focusing on the need for strong, clear and open relationships within coalition governments, the study recommends a united front among coalition members to prevent opportunities for decisive votes of no-confidence by the opposition. While the study acknowledges that there can be no legislation on this front, the practical implications of not following this recommendation is not good for the overall stability of any parliamentary democracy even in established ones like the UK. Following the practices in developed parliamentary democracies, the study suggests that Pakistani and Indian Prime Ministers resign if they predict a loss of parliamentary majority, sparing themselves the humiliation of a successful no-confidence vote. Additionally, it advocates for losing parties to accept the results gracefully, assuming the role of a vigilant and democratically mature opposition rather than destabilizing the whole political setup. The study reiterates and reaffirms the importance of a vibrant, vigilant and stronger civil society and free but responsible media. The study thinks a shift in Pakistan and up to some extent in India as well from patronage, populist, revenge and dynastic politics towards a more ideological or policy-based politics to strengthen the democratic foundation of the nation as the chaos and uproar in Pakistan about the Khan ouster is a symptom of a weak democracy and a much larger problem.

1.2 Originality and Value

This research, after digging deep into Pakistan's democratic framework, finds it modeled (structurally) on the

British Westminster system (if not ideologically) as per the 1973 Constitution. The study reaffirms the significance of a full term for the populace to assess a Premier's performance and for the smooth evolution of democracy. The study also unveiled the rarity and perceived disgrace of leaders resigning prematurely. It defines the political career and stains the legacy of any PM. The paper highlighted the negative impact of untimely votes of no-confidence on democratic norms, highlighting the tendency for premature elections due to political instability, disrupting the government's intended term completion plans. The research also clarified the status of defected members in Pakistan which was much debated in the media and in legal circles. For this purpose, it drew comparisons with the UK and India. It seeks to clear the air and complexities surrounding conflicting narratives, offering a comprehensive understanding to readers, especially students of law and political science. While the British political system has political conventions to morally punish a party's defection, in India, a more strict punishment is given in India by parliamentary membership cancellation and ban on having ministries in the next term. The research proposed a more harsh punishment than just membership cancellation. The research specifically addresses the stance on party defection in Pakistani law, examining why it appears less severe in India or more harsh yet less effective than in Great Britain. By analyzing recent Supreme Court judgments amid the charged political atmosphere, the research provides an informed opinion on potential future consequences and legality or the lack thereof.

2. Theoretical Framework

The present study endeavors to establish a comprehensive theoretical background and base for the topic by identifying a theoretical framework helpful for conducting a comparative analysis of the vote of no-confidence in Pakistan, India, and the United Kingdom. To achieve this goal, a meticulous review of existing literature on the subject is undertaken, summarizing views of different authors to aid our understanding of the topic.

2.1 Defining Feature Theory

Lento and Hazan (2021) assert that the vote of no-confidence stands as a basic and defining feature of parliamentary democracy. They contend that the absence of this mechanism renders a democracy devoid of its parliamentary nature. Thus, we ought to keep this tradition even if it is not practiced and useful often.

2.2 Executive Legislative Relationship Theory

King (1976) theorizes the notion that the vote of no-confidence serves as a reflection of the constitutional interplay between the executive and legislative branches of government. His analysis illuminates divergences between countries such as the UK, wherein parliamentary supremacy is accentuated, and nations like France, characterized by stronger executive branches. In short, it checks the power of the executive and ties it to the legislative like in UK, India and Pakistan.

2.3 Constitutional Engineering Theory

Sartory (1997) posits that the framing of a nation's constitution exerts a great influence on the functioning of its political system. Due to the lack of the separation of powers in the UK Constitution unlike the US, the vote of no-confidence becomes a necessary tool to keep checks and balances.

2.4 Stability Over Accountability Theory

Pehl (2016) underscores that certain political systems, exemplified by India, prioritize stability over government accountability, resulting in the relegation of the practice of no-confidence votes. This is to avoid an economic crisis. Our study found that UK stands for its traditions of accountability although practicality demands the vote of no confidence is not to be used frequently.

2.5 Evolutionary Theory

McLeay (2011) envisioned a political evolution for the vote of no confidence due to social and political influences. Drawing on the case of New Zealand, she described the country's progression from exploitative practices to the

establishment of parliamentary governance, and its subsequent trajectory toward pragmatic republicanism. These evolutionary shifts have contributed to a decline in the prevalence of no-confidence votes can be found in the UK, India and Pakistan.

2.6 Coalition Politics Theory

Shomer, Rasch, and Akirav (2021) contend that coalition politics and partisan structure result in influencing the no-confidence motions. Governments formed through coalitions give priority to maintaining a minimal majority over having accountability. This is most common in Pakistan followed by India and the UK.

2.7 General Factors Theory

Walther and Hellstrom (2021) identify several overarching general factors that offer predictions into the occurrence of no-confidence votes and the stability of cabinets. These factors included:
- the nature of the government,
- the degree of parliamentary fragmentation,
- prevailing unemployment rates,
- And the stringency or leniency of no-confidence laws.

2.8 C.V.N.C. Theory

Rubabshi and Hasson (2021) propose a typology of no-confidence votes, distinguishing between Constructive Vote of No-Confidence (CVNC) and Regular Vote of No-Confidence (RVNC). CVNC motions are characterized by their constructive intent and anticipated positive outcomes, contributing to the formation of more stable governments. In contrast, RVNC motions are ad hoc in nature and tend to engender political instability within the system. This was the case in 18th century UK.

2.9 Previous Studies in Related Areas

A range of diverse perspectives on the efficiency of Parliamentary democracy and the motion of no-confidence were reviewed by the researchers, the summary of which are stated below. Riker (1962) challenged the notion that a clear majority guarantees efficiency compared to coalition governments. Coalition governments with a clear majority party is also effective against the threat of no-confidence vote. Rubabshi, Shitrit & Hasson (2021) highlighted the two face nature of the no-confidence motion, calling it both a threat as a check on government actions and also terming it a destructive weapon when used in its negative essence leading to instability and economic weakening. Huber (1996) said that a difficult vote of no confidence process will make a Prime Minister stronger and vice-versa. Both Beer (1996) and much earlier Cric (1964) had noted that the vote of no confidence was engineered to fine tune the notion of responsibility of government towards the parliament. Much recent study of Goplerud & Shleiter (2016) has reaffirmed this view.

Druckman (1996) had made an excellent observation that the vote of no confidence was more effective in a bi-party system than in multi-party system. This is because in a two party system, the majority party can lose seats to the opposition whereas when many parties are involved, the smaller parties join the ranks of the government most of the time. Warwick (1994) postulated that a clear mutual understanding on core issues among coalition partners can avert the threat of no confidence vote. Almond & Powell (1978) declared that party discipline is a great obstacle against the vote of no confidence. Lijphart (2012) noted that the motion of no confidence was a feature of parliamentary democracy that is in contrast to the notion of separation of powers in the Presidential system. Laver & Schofield (1990) stated that the vote of no confidence is a bargaining tool for coalition partners in a government.

Shepsle & Weingast (1984) had warned against the practice of logrolling which can only be averted by strict rules and regulations around the practice of the motion of no confidence.

2.10 The Current Study

The history turning and dramatic aftermath of the no-confidence vote against Prime Minister Imran Khan in April 2022 stirred political unrest and an economic meltdown, giving rise to opposing and polarized narratives in Pakistan. The parliamentary proceedings surrounding the vote were marked by intense political propaganda wars, with the Deputy Speaker initially deeming the vote unconstitutional and illegal, citing alleged American interference. In response, President Imran Khan announced the Assembly's dissolution, a move later reversed by the Supreme Court through Suo Moto action. The flash point occurred when around 20 members of the ruling party mysteriously defected to join the opposition in the vote of no confidence. The Supreme Court's judgment on a Presidential Reference against foul play led to a decision not to count the votes of defected members. This judgment caused widespread debate and uproar across Pakistan. This study comprehensively analyzed the subsequent unfolding events in Pakistan, drawing comparisons with the legal procedures, conventions, frameworks and practices of the UK and India.

This research undertook a comparative evaluation of no-confidence votes against the Prime Minister in the parliamentary systems of the UK, India, and Pakistan. It found that the 19th century British Empire saw a very high number of no confidence votes comparatively speaking. The trend slowed down in the 20th century and in the 21st century, no successful vote of no confidence has occurred. In India, 21st century saw no successful vote of no confidence while many such attempts were made in the 80s and the 90s. In Pakistan, the army held direct power for almost three decades and Presidential powers saw the demise of many popularly elected governments. The vote of no confidence has only recently entered the national imagination as a result. The study determined the non-permissibility of a Member of Parliament defecting from their own party during a no-confidence vote in a parliamentary government system. Additionally, the research looked into the consequences of the Supreme Court's opinion and judgment on the dynamics of no-confidence votes in Pakistan and compared it with India and the UK. The Pakistani law bars members of the parliament from voting against the directives of their parliamentary leader. The same is followed in India with certain differences. Therefore, the research illuminated the legal intricacies and practical implications surrounding these critical aspects within the political landscapes of the three parliamentary nations.

3. Method

This research had a meticulous and multi-faceted methodology, drawing from various approaches and perspectives to holistically explore the law and practice of votes of no confidence in Pakistan, the UK, and India. The research paradigm used in the study was empiricism and doctrinal legal research, mostly focusing on objective facts and looking into legal codes, statutes, regulations, and case laws. The interpretive perspective, leaning towards qualitative data analysis, therefore, guided the study, calling for in-depth understanding. The researchers aimed to be as factual as possible like any other research. The study was primarily a legal empiricist one which aimed to clarify and simplify the understanding of the law and practice of the vote of no confidence in the selected countries.

Doctrinal Legal Research was done by the researchers who searched the answers to the research questions in books, case laws, articles, papers and the media.

The research is structured around three main objectives and questions, guiding its course through literature review, data analysis, and conclusion. It adopts a qualitative approach, aligning with the exploratory nature of the topic, negating the need for sampling as the law is self-explanatory. Ethical considerations are carefully observed, ensuring unbiasedness, respect for individuals, historical neutrality, value neutrality, and cultural sensitivity in the study's portrayal. Interpretivism was used to come up with themes to clarify and break down the topic under scrutiny. It was therefore philosophically inspired from interpretivist German sociologist Max Weber and followed the procedure given by Corbetta (2003).

The literature was reviewed to connect the dots and find any gaps to be filled. It was a necessary step for meta-analysis done by the researchers. Historical analysis and case studies were also used especially in the case of the UK vote of no confidence history and the vote of no confidence against Imran Khan respectively. Comparative analysis of the UK, India and Pakistan was a vital part of this research. There are similarities and differences among the three that had to be studied. The using of multiple strategies above led to data triangulation making the study clearer and as precise as possible. Of course, peer examination of the methodology helped in removing any glitches and gaps. Adherence to ethical standards of social research was sought to present a fair and respectful

representation of information, avoiding bias and controversy.

4.1 Findings

The study produced some interesting results by reaffirming previous research and presenting a fresh perspective to compare the British, Indian and Pakistani law regarding the vote of no confidence and its practice. As an example, the following table summarized the history of successful votes of no confidence:

Table 1: List of successful votes of no confidence in the U.K

No	Year	PM	Party	By Votes
1	1742	Earl of Orford Sir Robert Walpole	Whig	1
2	1782	2nd Earl of Guilford Lord North	Tory	19
3	1784	William Pitt the Younger	Tory	19
4	1830	Duke of Wellington Arthur Wellesley	Tory	29
5	1835	Sir Robert Peel	Conservative	27
6	1841	2nd Viscount Melbourne William Lamb	Whig	1
7	1841	2nd Viscount Melbourne William Lamb	Whig	91
8	1846	Sir Robert Peel	Conservative	73
9	1851	Lord John Russell	Whig	48
10	1852	Lord John Russell	Whig	11
11	1852	14th Earl of Derby Edward Smith-Stanley	Conservative	19
12	1855	4th Earl of Aberdeen George Hamilton-Gordon	Peelite	157
13	1857	3rd Viscount Palmerston Henry John Temple	Whig	16
14	1858	3rd Viscount Palmerston Henry John Temple	Whig	19
15	1859	14th Earl of Derby Edward Smith-Stanley	Conservative	13
16	1866	Lord John Russell	Liberal	11
17	1873	William Ewart Gladstone	Liberal	3
18	1885	William Ewart Gladstone	Liberal	12
19	1886	3rd Marquess of Salisbury Robert Gascoyne-Cecil	Conservative	79
20	1886	William Ewart Gladstone	Liberal	30

21	1892	3rd Marquess of Salisbury Robert Gascoyne-Cecil	Conservative	40
22	1896	Earl of Midlothian Archibald Philip Primrose	Liberal	7
23	1924	Stanley Baldwin	Conservative	77
24	1924	Ramsay MacDonald	Labour	166
25	1940	Neville Chamberlain	Conservative	-81
26	1979	James Callaghan	Labour	1

The Fixed-Term Act of 2011 in the UK wanted to limit the negative use of the motion of no confidence but it was later repealed by the Dissolution and Calling of Parliament Act 2022 which revived the traditional powers of the PM to call early elections and was back to the traditional conventions regarding the vote of no confidence. Party defection is not a legal crime but a violation of the political norms and values of British political culture. In India, the central government tends to be very powerful and has many tools at its disposal to call off or defeat a vote of no confidence. The Modi regime is going to further go in that direction. The anti-defection law of India was inducted in the constitution in 1985 and it is stricter than the Pakistani law. The Speaker plays an important role in party defection compared to the Election Commission in Pakistan.

Initiating a vote of no confidence is difficult in Pakistan compared to India and the UK. The act of the Deputy Speaker Qasim Suri to call off the vote of no confidence as a foreign conspiracy was unconstitutional. His justification of Article 5 (1) was inadequate. He was bound by Rule 35 of the Rules of Business of the house to carry out the vote of no confidence without any delay. The subsequent Suo Moto by the Supreme Court of Pakistan was justified as a Judicial Review against the violation of the constitution as per Article 69. The announcement of the PM Imran Khan to dissolve the assembly was not in line with Article 58(1). According to Article 63A, a member abstaining from voting is also a party defector. In line with the spirit of Article 17 of the constitution, the votes of defectors cannot be counted. The judgment in favor of Pervez Elahi as receiving 10 votes to defeat the vote of no confidence being the parliamentary leader of Muslim League Quaid-e-Azam in the Punjab Assembly despite the opposition of Party head Chaudhary Shujaat Hussain showed the parliament party and not the party in general has to maintain party discipline in the parliament.

The importance of a suitable government duration was revealed to be important for enhanced governmental performance to which a negative use of the no-confidence motion can be a threat. Thus, the study emphasized constructive use of the tool. As a cited example as a strategic tool, noting instances where it was wielded positively, such as Prime Minister John Major's successful handling of the Maastricht treaty. The research points out a gap in psychological and sociological analysis, urging a deeper understanding of the psychological impact, rebellion, and conformity resulting from confidence votes from psychological perspective. It also emphasizes the role of personal charisma in the theatrical play of the vote of confidence. Social networks and the vote of no confidence should also be studied.

The Parliament and the cabinet uses strategic and bargaining tools in no-confidence votes. Motivations behind political parties calling for votes of confidence may vary, with some prioritizing long-term stability over short-term policy concessions. The research investigates into the complexity of confidence votes, revealing that sociological, economic, and political factors often outweigh policy differences. It further explores the factors influencing Prime Ministerial decisions, including procedural feasibility, political constraints, and the government's composition. The researchers suggest that toughening rules for bringing votes of no-confidence could reduce logrolling practices. This research unveils several key themes shaping the landscape of parliamentary democracy, providing both affirmations of established knowledge and novel insights.

Parliamentary sovereignty and vote of no-confidence which is in alignment with established views, particularly resonating with Huber, J. D. (1996). Crucial role of opposition in parliamentary democracy is a new finding through a fresh perspective. The study asserts that the opposition's significance is more pronounced in parliamentary systems due to the accessibility and efficacy of the vote of no-confidence, distinguishing it from presidential systems. Low success ratio of no-confidence motions is a phenomenon extensively discussed by scholars like Riddell (1994). Collective responsibility and no-confidence was discussed by Saini & Saini (1971), the research emphasizes that a vote against the Prime Minister is essentially a vote against the entire government and ruling party, discrediting any notion of a 'minus one' formula. Significance of anti-defection laws seems to be a unique contribution that emerges in the emphasis on the importance of robust anti-defection laws, especially in developing parliamentary democracies. The study condemns the exploitation of loopholes and advocates for updates, toughening up anti-corruption measures to preserve the integrity of the no-confidence motions. Judicial intervention and suo moto notice in Pakistan was a historic Precedent not to challenge Parliamentary Supremacy but to uphold it. Status of defectors in UK, Pakistan and India is a new comparative insight as no legal proceedings may be there against party defectors in UK but the political repercussions are more severe compared to South Asian nations.Dissolution of Parliament was found to be a common procedure with minor variations. Choice between accountability and stability also seems to be a new comparative insight as developing parliamentary democracies like India and Pakistan are more susceptible to instability after no-confidence motions. The research underscores a groundbreaking judgment affirming the Supreme Court's role in ensuring constitutional adherence during parliamentary proceedings. This move, far from threatening parliamentary supremacy, is seen as a safeguard against democratic mockery. Consequences of failed No-Confidence are widely acknowledged resonating with reports from BBC News (2022), Bhatti (2022), and Pehl (2016). The study hints at the strategic elements of political realism, encouraging future research in this theme. Capitalist concerns for stability seems to be a global Sociological Trend as capitalist entities favor stable governments and are against frequent votes of no confidence. Declining popularity of no-confidence is a trend acknowledged in the study. Votes of confidence for democratic decisions Aligning with the views of Dangerfield (2017).

5. Conclusion

This comprehensive study unravels critical conclusions, shedding light on the various dynamics surrounding votes of no-confidence in parliamentary democracies. The findings mentioned give a fresh look at the problem at hand. It gives an important comparative study of laws and its practice in the UK, India and Pakistan. It gives context to the recent saga of No Confidence Votes in Pakistan. The vote of no-confidence is a cornerstone of parliamentary sovereignty, underscoring its indispensable importance in maintaining the checks and balances within the democratic framework. The motion of no-confidence proves to be a potent tool granting relevance to opposition forces. The study reveals that, despite a seemingly low success rate, the mere threat of a no-confidence vote empowers the opposition, ensuring its decisive role in Parliamentary democracy. While the study acknowledged the fears posed by a vote of no-confidence, it predicts that, with evolving party systems and disciplined structures, the trend of low success rates will continue. The robust party discipline acts as a safeguard against successful motions and therefore ensures some stability. The doctrine of collective responsibility emerges as a significant obstacle against the success of no-confidence votes. A crucial finding is the necessity of comprehensive anti-defection laws, particularly in developing democracies. Unlike well-established systems, developing countries witness a patronage-driven model, necessitating stricter measures to counter corruption, horse trading and log rolling. The study also applauded the short and long-term positive impact of the Suo Moto case, viewing it as a positive moment in Pakistan's democratic evolution. Defection laws are absent in the UK but found yet inadequate in Pakistan and India. The study also credits increasing frequency of no-confidence motions in Pakistan due to the lack of direct military intervention and the diminishing of Presidential Powers. The study importantly correlates the declining practice of no-confidence motions with global economic trends, particularly in capitalist countries as chaotic changes resulting from successful motions are viewed unfavorably in consumer-driven economies. The study

underscores the uniqueness of each no-confidence procedure globally, with minor variations in philosophy and process among parliamentary democracies. The study aligns with established theories, affirming the validity of defining feature theory, executive-legislature relationship theory, constitutional engineering theory, stability or accountability theory, evolutionary theory, and general factors theory in understanding votes of no-confidence.

In essence, this research provides a panoramic view of the multifaceted dynamics surrounding no-confidence votes, enriching the scholarly discourse on parliamentary democracy.

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