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The Impact of Brexit on the Transformation of Majoritarian Democracy in the United Kingdom of Great Britain and Northern Ireland

Abstract: The article attempts to answer whether, and if so, to what extent, the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union (the so-called Brexit) impacted the British model of democracy. The starting point for the analysis is the famous classification of Arend Lijphart, who distinguished two main models of democracy – Westminster and consensus – identifying the United Kingdom as a prime example of the first of them. Using the method of institutional and legal analysis and the historical method, the author tries to prove the thesis that Brexit has shaken the foundations of the majoritarian democracy in the United Kingdom. However, the transformations of this model are not a new phenomenon, as they are part of the trend of changes occurring in this country, at least since the end of the 1990s. The article also proves the thesis that the serious political and systemic tensions to which Brexit – for very different reasons – led can be treated as temporary, as there is little indication that these tensions would permanently undermine the foundations of the Westminster model of democracy in the United Kingdom.

Keywords: *United Kingdom, Brexit, Westminster democracy, majoritarian democracy, Arend Lijphart*

Introductory Remarks

Researching the transformation of the British democracy model in recent years, especially in the context of Brexit, is a huge challenge. It is in danger of falling into many methodological traps that result from the attempt to describe the dynamically changing reality using

terms and models traditionally used in relation to the British political and constitutional system. The point of departure for such research is usually the theory put forward by the Dutch political scientist Arend Lijphart (1999), who analysed 36 democratic countries and divided them into two main democracy models: majoritarian democracy and consensus democracy. The majoritarian model is also known as the Westminster model since its original and best-known example is the United Kingdom of Great Britain and Northern Ireland. The relatively pure cases of majoritarian democracy also exist in many countries whose political systems are based on the British one.

Naturally, it is true that the entire Brexit process, initiated through the June 23, 2016 referendum, shook British politics and was a major dent in the foundations of the British political system, otherwise known for its stability. In order to prove this, no deep analysis of these changes is required; ordinary observation of political reality will suffice. In the United Kingdom, in 2017 and 2019, the general elections were snap elections. The first resulted in a hung parliament, where the winning party had no absolute majority of votes. Consequently, the Cabinet of Theresa May was a minority government supported in the major votes (under a confidence-and-supply agreement) by one of the smaller third parties. Prime Minister May, much like her predecessor, David Cameron, stepped down due to losing control over the Conservative Party. This lack of control was noticeable on many occasions, where the government lost important votes or, quite often, was unable to influence the pace and organisation of the Parliament's work. Other manifestations of this situation include numerous resignations by ministers, cases of crossing the floor, blatant opposition to the party line, voting in discordance with the instructions from party whips, and the punishment of unruly and rebellious MPs by removing them from factions in the Parliament. All of this not only deviates significantly from the majoritarian democracy model described by Lijphart but is also contrary to how the power and position of the particular institutions making up the British political system (and especially the Parliament) were described by Walter Bagehot (1867) in his classic work, *The English Constitution*.

Considering that, it seems justified to ask whether Brexit – in addition to other changes it has caused – will also be perceived as the source of far-reaching and perhaps irreversible transformations of the Westminster model of democracy, which, according to the conclusions drawn by some of the scholars researching British constitutionalism, could even start to gradually evolve towards the consensus democracy model. This article attempts to investigate this research problem by proving that Brexit has actually disturbed the functioning of British democracy and has visibly shaken the foundations of the Westminster model of democracy, at the same time showing, however, that such transformations are nothing new. They were initiated by Brexit but are in line with the tendencies occurring in the United Kingdom since the end of the 1990s and, in some respects, since as far back as the mid-1970s. Consequently, they should be analysed in a much wider historical context, significantly affecting their assessment.

However, on the other hand – and this will also be demonstrated in this article – one cannot help but notice that the United Kingdom leaving the European Union has become a generator of multiple political and system tensions¹. Nonetheless, a proposition could be put forward that, considering the nature of the “European factor”, this constitutional commotion could not have been avoided. Still, these tensions are mostly temporary, and their impact on the functioning of British majoritarian democracy will not be substantial. Certainly, it will not be more extensive than, e.g., the political and constitutional reforms introduced at the end of the 1990s by the Labour Party government under Tony Blair. Brexit has changed British democracy, but this democracy was changing anyway; what is more, in the years to come, further transformations will occur. At the same time, very little suggests that this will have any major impact on the foundations of the Westminster model, which, over recent decades, has been evolving, including natural evolution, and will continue to do so in the future. A scenario where Brexit could, paradoxically, consolidate this model even further cannot be ruled out, either.

Lijphart’s Westminster Model of Democracy and the Transformation of British Democracy

For Lijphart, the point of departure for dividing democracy into majoritarian democracy and consensus democracy² was the question of who, in whose name, and in whose interest holds power in a situation where people have different opinions and preferences. A majoritarian democracy is a democracy where a majority government holds power in the name and interest of those who support it. Their numerical superiority may be minimal, but this is irrelevant. In a consensus democracy, this majority is perceived in a completely different way, with attempts being made to expand it to the maximum extent so that the government represents the interests of as many people as possible. What naturally follows is that the majoritarian model entails exclusivity, competition, and an antagonistic style in politics, while the consensus model features openness, negotiations, and striving for a compromise to a larger extent (Lijphart, 1999, pp. 1–2).

The initial assumptions allowed Lijphart to identify each model’s ten most important features (by juxtaposing these models based on dichotomies) and then to attempt to place the particular countries on a spectrum ranging from the Westminster model to the consensus model. These features are grouped into two dimensions: the executives-parties dimension and the federal-unitary dimension. In the executives-parties dimension, the classic Westminster model features a concentration of executive power in the hands of a single-party

¹ For more on the constitutional tensions caused by Brexit, see Bogdanor (2019).

² These terms were borrowed from Dixon (1968). As a matter of fact, there are many more classifications of the forms of democracy; these are based on similar criteria, but use different nomenclatures; see, e.g., Dahl (1980).

majority cabinet, domination of the executive over the legislature, a two-party system, a majoritarian electoral system, and a pluralist system of groups of interest that freely compete against each other. In the federal-unitary dimension, majoritarian democracy is defined by a unitary and centralised government, a concentration of legislative power in a unicameral parliament, a flexible constitution that can be amended with a simple majority of votes, the principle that the parliament itself determines whether its acts are constitutional, and the principle according to which the central bank is controlled by the executive (Lijphart, 1999, pp. 3–4).

From a constitutional perspective, for Lijphart, one of the model examples of a relatively rare majoritarian democracy was the United Kingdom of Great Britain and Northern Ireland. This country developed solutions that were subsequently – and to a different degree – adapted by many former British colonies and dominions across the world, including New Zealand, Canada, Australia, and Barbados. However, when carrying out a more detailed analysis of the particular features of this model, the Dutch scholar himself correctly noticed that the political and constitutional systems of countries undergo constant changes and, as a result, their democracy models continue to evolve. The nature and sources of these changes may vary – some of them are a result of a modification of the political system or the legal regulations that define its nature, others may be caused by social and political changes, and others still may be a consequence of even more extensive processes, such as globalisation-related transformations. New Zealand, considered by Lijphart to be an even more distinctive prototype of the Westminster model, is a good example. The modifications introduced to the New Zealand electoral system in 1993 came into effect during the 1996 election. It consisted in abandoning the plurality system and moving towards the so-called mixed-member proportional system (MMP), which resulted in New Zealand moving significantly away from the classic Westminster democracy model (Żukiewicz, 2020, pp. 34–35).

A similar evolution of the majoritarian model can be observed in the United Kingdom of Great Britain and Northern Ireland. After World War II, this model existed in its purest form until the beginning of the 1970s. The sole fact of The European Communities Act 1972 coming into effect and the resulting accession of the United Kingdom to the European Communities in 1973 left a mark on the British political and constitutional system. Transferring some of the competencies from London to the European Union significantly weakened the British Parliament, further unbalancing the relationship between the legislature and the executive in favour of the latter³. Soon afterwards, in 1975, the British voted in a referendum on whether their country should remain a part of the European Community (Common Market). It was the first UK-wide referendum in history; this precedent could be considered constituting another major change in how the role and importance of the Parliament are defined (Danel, 2022, p. 47), but also a substantial modification of the British model of

³ For more on the EU's impact on parliamentary institutions in the UK, see Giddings and Drewry (2004).

democracy. It is worth remembering that using direct democracy tools, which are so foreign to the British political tradition, is, according to Lijphart's theory, characteristic not of the Westminster model but the consensus model⁴.

Similarly, in the federal-unitary dimension, the 1970s in the United Kingdom saw major changes to the initial assumptions of Lijphart's theory. Although the first acts intended to achieve devolution of Scotland and Wales, initiated by a Labour Cabinet and adopted by the Parliament, were rejected by the Scots and Welsh in the 1979 referendums, it certainly was the beginning of an extensive discussion concerning devolution. The Local Government Act 1972 was a breakthrough in many ways, introducing a solution that was considered revolutionary (and still largely functions in England): a system of elected, two-tier metropolitan and non-metropolitan county and district councils. It could be seen as an important stage in the decentralisation of power and establishment in the constitutive parts of the United Kingdom of local authorities with democratic legitimisation⁵.

A real breakthrough occurred towards the end of the 1990s when the Labour Party came back to power and implemented constitutional reforms. Of particular note is the devolution of central power, which was carried out under The Scotland Act 1998, The Government of Wales Act 1998, and The Northern Ireland Act 1998, which established the relevant legislative and executive authorities in the respective parts of the United Kingdom. Additionally, under the Greater London Authority Act 1999, the Greater London Authority was set up, comprising the Mayor of London (elected in direct election) and the London Assembly, composed of 25 members⁶. These changes should be considered an important stage in the United Kingdom's territorial decentralisation and deconcentration of power. However, this was not the last stage because, for instance, neither was the legal dilemma known as the West Lothian Question (or the English Question) solved (Danel, 2017, pp. 109–127; Russell & Lodge, 2005), nor were elected regional assemblies and mayors (following the example of London) introduced.

However, the reforms introduced by Tony Blair's Cabinet also significantly impacted the executives-parties dimension. Of particular note in this respect is The Constitutional Reform Act 2005, establishing, among others, a Supreme Court of the United Kingdom,

⁴ As a matter of fact, this aspect may be considered to be a certain shortcoming of Lijphart's theory. On the one hand, he was right to conclude that direct democracy is an emanation of the diffusion of power, which is typical of the consensus democracy model. On the other hand, the principle that what matters in the decision-making process is the will and expectations of the majority (any, even the slightest) which constitutes the essence of the Westminster model, corresponds to the concept of a referendum, where the will of the people is in fact the will of the majority (any, even the slightest) of the people. For more on this dilemma, see, e.g., Vospernik (2018, pp. 143–170).

⁵ Many of the solutions introduced by this Act were significantly modified by the Local Government Act 1985 introduced by the Cabinet of Margaret Thatcher. This Act also abolished the Greater London Council that had been functioning since 1965.

⁶ For more on devolution reforms in the United Kingdom, see Bogdanor (2001) and Mitchell (2009).

which replaced the House of Lords as the Supreme Court of Appeal. The House of Lords was thoroughly reformed under The House of Lords Act 1999⁷. In the context of European integration, the shape of British democracy was largely impacted at the beginning of the 1990s by the Treaty of Maastricht, which established the European Union, and then by The European Parliamentary Elections Act 1999, which changed the voting system to the European Parliament. According to this Act, from 1999, voting in these elections was proportional and took place in 11 electoral regions, with MEPs being elected in each of them; the seats were allocated using the d'Hondt method⁸. The ratification of the Treaty of Maastricht, which laid the foundations of the establishment of the Economic and Monetary Union, resulted in one more reform introduced by Blair's cabinet – this time with regard to the variables defined by Lijphart within the federal-unitary dimension. It was the granting of operational independence to the Bank of England, which was given the power to set the British base interest rate autonomously. It was another example of a change that ran counter to the assumptions of the Westminster model (Busch, 2007).

These far-reaching constitutional changes were the basis for questions related to whether the United Kingdom still fell under the definition of the Westminster democracy model. Interesting conclusions were drawn, e.g., by M. Flinders (2005, p. 63), who described these reforms as a “critical juncture that challenges Lijphart's characterisation of Britain as a majoritarian democracy”. Nonetheless, he concluded that significant changes only occurred for the federal-unitary dimension. In contrast, in the executives-parties dimension, they had led to an even bigger concentration of power, which means that it was unjustified to claim that the United Kingdom had dramatically tilted towards the consensus democracy model, as it was still the Westminster model that offered a better description of what democracy looked like in the United Kingdom (Flinders, 2005, p. 63). Carrying out a more detailed analysis of these reforms, Flinders (2002, p. 39) pointed out one more key aspect: in the British constitution, power is constantly shifting between institutions at the national level (Parliament, Cabinet, courts), the regional level (authorities established as a result of devolution reforms), and the supranational level (European Union institutions), this being a completely natural phenomenon⁹.

⁷ An interesting discussion of the impact of the 1999 reform of the House of Lords on the relevance of the categories used by Lijphart with respect to the British Parliament was offered by Russell (2010, pp. 866–885).

⁸ Direct elections to the European Parliament were held in the United Kingdom from 1979, but before that, the first past the post system, which is used for general elections, had been used. It was only in Northern Ireland that the MEPs were elected according to the single transferable vote system – this was not changed by the 1999 reform.

⁹ On the topic of the nature and evolution of the British constitution over the years, see also Flinders (2010), Leyland (2012), Bogdanor (2009), and Hazell (2008).

Although Lijphart's (2012, p. 20) first edition of *Patterns of Democracy* did not cover that period, in its second edition, published in 2012, he made it clear that "recent changes in British politics do not change the overall character of Britain as a prime example of majoritarian democracy". However, Lijphart's approach is contested by some scholars of the British constitutional system. For many years there has been an ongoing debate (sometimes even a dispute) on the merit of the concept of the Westminster model itself. For example, for Rhodes et al. (2009), this concept accommodates a set of ideas, beliefs and constitutional features of a "loose family of governments" and may be interpreted differently in different countries. Strohmeier (2015) is among those who emphasise the gradual 'consensualisation' of the British Westminster model due to the mentioned constitutional reforms and the consequences of the 2010 general election (though after the 2015 general election, this process has been reversed). Russell and Serban (2021; 2022), in turn, claim that the concept of a Westminster model is "stretched beyond repair" and should be "retired from comparative politics". Answering them, Flinders et al. (2021) suggested that the concept is "stretched but not snapped" and remains useful in comparative research.

The Dynamics of Changes after 2010

Before analysing the impact of Brexit on British democracy, it is worth recalling that the sequence of political events that led first to the referendum and then to the United Kingdom leaving the European Union started in May 2010. The general election that was held back then not only ended 13 years in power for the Labour Party but was also a point of departure for actions and decisions that, once again, were a basis for questioning whether the initial assumptions of Lijphart's model still correspond to the British political and constitutional reality. The election result itself could be seen as an anomaly or a distortion of the traditional principle of the Westminster model, where full executive power rests with a majority, one-party cabinet. The 2010 election was the first one since 1974 that produced a hung parliament, which resulted in the formation of the first coalition government during peace since the 1930s¹⁰. It was also the first coalition in the history of the United Kingdom that was formed immediately after the general election (and not in an extraordinary situation, such as war or a political or economic crisis), was not announced to the voters in any way, and, what is more, those voters were not given the possibility to express their acceptance (or the

¹⁰ In academic literature, this coalition is referred to as an *executive coalition* or a *governmental coalition*, which means that it was formalised through the execution of a *coalition agreement* and the parties that form it divide between themselves, in the relevant proportion, the positions in the cabinet. Another category is a *legislative coalition* or a *parliamentary coalition*, which is typical of a minority government and means that the cabinet is formed by the largest party, but, as a result of the agreements signed with another party (or other parties), it is supported by this party (or these other parties) in the most important votes in the Parliament. For more, see, e.g., Riker (1962) or Laver and Schofield (1990).

lack of it) for such a way of forming the British government. It raised questions concerning this new situation, unknown to the British political tradition. There were even fears that hung parliaments and coalitions (which, according to Disraeli, “England does not love”) could become a norm, completely altering how the British political system functions. That, in turn, could become a hotbed for future political conflicts and, consequently, the beginning of far-reaching legal and constitutional changes¹¹. Some steps were taken to prepare for this new reality and protect the United Kingdom against a potential constitutional crisis. Examples of such actions include the adoption of the *Cabinet Manual* (Cabinet Office, December 14, 2010), which sets out the previously unwritten laws, customs, and procedures concerning the appointment and functioning of cabinets, including if an election results in a hung parliament. Works on this document were started towards the end of the Labour Party’s spell in power, with it being announced that it could be the first step to codify the British constitution, which would be a revolutionary change.

However, the *Cabinet Manual* has not become the beginning of a written constitution of the United Kingdom¹², and the 2010 election results turned out to be an exception to the rule rather than the introduction of a new rule. The coalition agreement between 2010 and 2015 resulted from a compromise between the Conservative Party and the Liberal Democrats, with each party making certain concessions concerning their manifestos (Quinn et al., 2011, pp. 295–312). There was an attempt to reform the electoral system; however, it was not intended to replace the first past the post system with a proportional system but with the alternative vote (AV) system, which is only a certain variant of the majority system. Regardless, the British decisively rejected the proposed reform in the 2011 national referendum. Significant changes within the executives-parties dimension boiled down to the adoption of an act making the parliamentary term fixed¹³, which not only took away the Prime Minister’s right to bring forward the elections (by way of royal prerogative) but also introduced a procedure – previously unknown in the British political tradition – of voting on whether to shorten the term of the House of Commons, substantially strengthening the position of the Parliament¹⁴. Changes to the federal-unitary dimension also turned out to

¹¹ For more on the potential implications of such constitutional changes, see Matthews (2015, pp. 308–334) and Bogdanor (2011).

¹² Treating this document as such was questioned already in 2011 by the Constitution Committee of the House of Lords; see Constitution Committee – Twelfth Report (March 7, 2011).

¹³ *Fixed-term Parliaments Act 2011*.

¹⁴ The procedure was applied in 2017, when the MPs, with a majority of two thirds of the votes, decided on an early election. The next election was scheduled for 2022, but it was held already in 2019, when the MPs decided to circumvent the 2011 Act by means of another act, the Early Parliamentary General Election Act 2019, which was adopted with a simple majority of the votes. In its manifesto, the Conservative Party promised to abolish the Fixed-term Parliaments Act (as it was causing a decision-making paralysis) and return to the old, traditional solutions, i.e., to reinstate the Prime Minister’s right to use the royal prerogative to dissolve the Parliament, as well as to protect this right against checks by the Supreme Court.

be slight, even though the Liberal Democrats attempted to further federalise the United Kingdom. However, these efforts ended in minor amendments to the Scotland and Wales Devolution Acts. In turn, the 2014 Scottish independence referendum¹⁵, resulting in Scotland remaining in the United Kingdom, once again sparked discussion on the English Question. Consequently, the Standing Orders of the House of Commons were amended in 2015: the English Votes for English Laws (EVEL) procedure was introduced, where legislation affecting only England required the support of most MPs representing English constituencies¹⁶.

The results of the general election held on May 7, 2015 shattered the forecasts of some experts on the British constitutional system, according to which British democracy was to undergo permanent and far-reaching changes after 2010. It turned out that, despite continued high support for third parties (mainly the Scottish National Party) and a continued decrease in the number of marginal seats, this election brought back the British two-party system and, with it, a certain traditional system of dependencies between various institutions of power, affecting the features of the Westminster model listed by Lijphart. However, the result of this election was of fundamental importance for another reason: in light of the statements made by David Cameron in January 2013 (the so-called Bloomberg Speech), the victory of the Conservative Party and its ability to form a single-party Cabinet automatically meant that, soon afterwards, the British would have to vote in a referendum on whether they wanted the United Kingdom to remain in the European Union. As it turned out, this referendum became another critical juncture in discussing the condition of British democracy.

Brexit and the Westminster Democracy Model in the United Kingdom

The result of the referendum held on June 23, 2016 caused major political turbulence in the United Kingdom, which developed into political chaos – a situation normally never associated with British democracy. Another hung parliament, produced in 2017 by the early general election, did not lead to the formation of a coalition government (like in 2010). Instead, the Conservative Party formed a minority government, which depended on the support of the Democratic Unionist Party of Northern Ireland. The accumulation of system anomalies over a relatively short time once again gave rise to the question of whether British politics still was, according to the assumptions of the Westminster model, “exclusive, competitive, and adversarial” (Lijphart, 1999, p. 2), or whether perhaps it had

This was finally done by means of the Dissolution and Calling of Parliament Act 2022, which should be seen as a clear return to the Westminster democracy model.

¹⁵ Such a frequent use of referendums, as it has already been mentioned, is another phenomenon at odds with the initial assumptions of the Westminster model.

¹⁶ The procedure was suspended in April 2020 and, a year later, the House of Commons abolished it completely, which meant a return to the previous solutions. This, in turn, resulted in the re-emergence of the West Lothian Question.

become closer to the consensus democracy model, which is based on bringing together rather than dividing and features compromise, cooperation, and the need to consider different interests and points of view. In order to see if Brexit-related events could completely alter the nature of British democracy, M. Giuliani (2022, p. 554) developed a model he used to analyse four behavioural dimensions: voting in the Parliament against the party line, government defeats in parliamentary votes, resignations from ministerial positions, and MPs changing party affiliation. Giuliani's observation covers a period of approx. 40 years, as it concerns all terms of the House of Commons from 1979, i.e., starts more or less at the time when Lijphart's assumptions concerning British democracy begin to show the first cracks. The conclusions from Giuliani's analysis are slightly surprising, suggesting that the constant dynamics of the changes occurring during the functioning of the Cabinet – a central institution in a majoritarian democracy – started long before Brexit. Consequently, everything that happened between 2017 and 2019 is exceptional to the same extent as the events of the mid-1970s when considered against a background of the entire post-war history of the United Kingdom. The transformations of the Westminster model are identified through and equated to Brexit; therefore, they are only a result of certain underlying frictions that had been piling up since the mid-1990s, with the Brexit referendum simply setting them off (Giuliani, 2022, pp. 554–559).

These changes have not always been so clear and unidirectional in the executives-parties and federal-unitary dimensions. In the former, between 2017 and 2019, there were several interesting confrontations between the Parliament and the government, suggesting tensions between the legislature and the executive, typical of the Westminster democracy model. One example in this respect is the legal dispute that broke out at the beginning of 2017: whether, from a constitutional point of view, initiating the procedure provided for in Article 50 of the Treaty on the European Union is within the competence of the government or whether prior consent of the British Parliament, expressed in the form of an act, is required. For this dispute to be solved, a ruling of the High Court was necessary, followed by an examination by the Supreme Court of the appeal filed by the government (Danel, 2022, pp. 161–163). A similar controversy occurred soon afterwards when the first version of the bill of an act on leaving the European Union (*European Union (Withdrawal) Bill 2017–2019*) granted the British government (and, in practice, the members of the Cabinet) certain special rights allowing the creation of secondary legislation when transposing European law into British law, which was intended to ensure legal continuity in the United Kingdom following Brexit. The use of the Henry VIII clauses in this respect was seen as an attempt to skip the Parliament in this complex legal operation (Danel, 2018, pp. 167–169). Finally, there was a lengthy dispute concerning the votes concerning the final shape of the withdrawal agreement (referred to as “meaningful votes”): to what extent, and in fact whether at all, the Parliament could affect the contents of that agreement or if it could only accept or reject it. The latter option could end with the United Kingdom leaving the European Union without agreement (a no-deal Brexit).

In each of these political and legal disputes, the Parliament was ultimately successful in ensuring that it would have a say – although it is difficult to imagine that things could be different in a country where the sovereignty of the parliament is one of the paramount political principles. However, in practice, the executive remained the driving force behind the system, confirming that the British institutional system is primarily based on the principles of majoritarian democracy¹⁷. If one were to assume that European integration weakened the British Parliament because of London transferring some of its competencies to the European Union, then Brexit should produce an opposite effect, i.e., these competencies returning to Westminster Palace. However, such a theory would excessively simplify political reality (Baldini et al., 2018, pp. 539–540). The Parliament's increased control over the government, observable between 2017 and 2019, was a result not so much of the Parliament becoming stronger because of Brexit but of the weakness of the minority government, which, in important votes, had to not only count on support from the Democratic Unionist Party but also on discipline among the members of the Conservative Party itself (which fairly often was difficult to enforce)¹⁸. To some extent, the situation has returned to normal after the early general election on December 12, 2019, which ended with a clear win for the Conservative Party, allowing it to form a single-party Cabinet. Boris Johnson's term as Prime Minister saw many controversies and legal and political tensions related to finalising Brexit. These include the said circumvention of the Fixed-term Parliaments Act in order to hold the 2019 election, the suspension of 21 MPs who voted for an amendment intended to force the Cabinet to explicitly reject the possibility of a no-deal Brexit, or the legal and constitutional dispute caused by Prime Minister Johnson's sudden decision to prorogue the Parliament, which the Supreme Court ultimately held to be illegal. However, disregarding the controversies, one could claim that the 2019 election also ended the crisis into which British democracy descended¹⁹. But this election did not completely end the political turbulence in the United Kingdom. In 2022 two more changes to the position of Prime Minister of the British Cabinet took place. However, they were to a greater extent a consequence of factors other than Brexit – the pandemic (which, by the way, led to further centralisation of power

¹⁷ For more on the relations between different branches of government in the UK, see Russell & Cowley (2018, pp. 18–28).

¹⁸ This problem was faced not only by Theresa May, but also her successor, Boris Johnson, for instance, when, against the Cabinet, the House of Commons accepted The European Union (Withdrawal) (No. 2) Act 2019 (known as the “Benn Act”), which imposed on the government an obligation to apply for another postponement of the final date for the United Kingdom leaving the European Union if the Parliament refused to accept the withdrawal agreement agreed with Brussels or to approve a no-deal Brexit. This in fact happened, forcing Boris Johnson to ask Donald Tusk, the then President of the European Council, to extend the deadline for the United Kingdom's withdrawal from the EU until January 31, 2020.

¹⁹ For more on the implications of 2019 general election on the condition of British democracy, see, e.g., Cutts et al. (2020, pp. 7–23) and Danel (2021, pp. 992–1006).

and strengthening of the executive)²⁰, the difficult socio-economic situation in which the British state found itself, or the rising cost of living caused by high energy prices and inflation, which in turn were the result of the destabilisation of the political and economic situation in Europe after Russia invaded Ukraine.

If we, however, want to prove that the 2019 general election was another of the many returns to Lijphart's initial assumptions for majoritarian democracy, we need to concentrate on three main issues: single-party rule, domination of the executive over the legislature (which in practice must cooperate), and the two-party system. The last of these issues seems especially important, as the two-party system is the foundation of a strong, single-party majority government. And, in fact, from 2005, British Cabinets were not strong, and sometimes not even single-party. Meanwhile, the number of seats won by the winning party in the 2019 election (365 out of 650) was the largest since 1987. In the 2010s, one could be under the impression that the British party system was increasingly fragmented, with third parties (such as the United Kingdom Independence Party or the Scottish National Party) on the rise, which could open prospects for the two main players to be pushed out from their traditional areas of influence or even for the electoral system to evolve towards proportionality. Moreover, Brexit was supposed to be a variable defining new lines along which political divisions would run within that system. It seems that none of these scenarios came true, which resulted in UKIP's political downfall, which was confirmed by the 2017 general election. Various indexes showing the level of fragmentation of a party system or the disproportional nature of an electoral system seem to suggest that recent years have been a return to the situation that existed before rather than a move to another stage of a significant evolution of the British democracy model (Baldini et al., 2018, pp. 540–542). It is also worth emphasising that, even though since 2015 we have been analysing the British party system mainly in the context of Brexit, these transformations are also affected by factors related to the general dynamics of the changes in contemporary electorates. This problem exists in the United Kingdom exactly to the same extent as in other European democracies (Baldini et al., 2018, pp. 539–540).

As for the federal-unitary dimension, it should be clearly emphasised that Brexit became another stage in the discussion on the rights of the devolved governments. Not the first and presumably not the last stage at that, as this is an element of a wider discussion concerning the territorial structure of the country that has been ongoing in the United Kingdom for some time now: to what degree it still is a unitary state and how much it has evolved and will continue to evolve, especially towards some special type of federal state. The results of the referendums in Scotland and Northern Ireland provide a new dimension for this discussion since (for different reasons in both cases) the Scots and Northern Irish mostly voted against the United Kingdom leaving the European Union, so one could claim that Brexit was carried

²⁰ For more on the impact of the COVID-19 crises on British politics, see, e.g., Baldini et al. (2023, pp. 140–152).

out against their will, mainly through the votes of the English and Welsh. And yet, there is even more complexity since the residents of Greater London, who also enjoy the benefits of the devolution reforms, were against Brexit, too, while following the referendum, the Welsh – much like the Scots and Northern Irish – started to articulate far-reaching fears of the economic consequences of Brexit for their region. The constitutional tensions caused by the decision made in the 2016 referendum boiled down to whether the devolved governments would have any impact on what, from a legal point of view, the process of withdrawing from the European Union would look like (e.g., in terms of the division between central and regional authorities of the powers regained by the United Kingdom) and whether they would have to accept (or could veto) the entire British legislation related to the withdrawal agreement (Baldini et al., 2018, p. 541).

The decisions in these matters were made, also before the UK Supreme Court, in a clear manner, confirming – at least in this respect – the unitary nature of the United Kingdom, as the central institutions of power in Westminster (the government and the Parliament) were responsible for preparing Brexit and approving the final deal with Brussels. Naturally, this has not ended the extensive discussion concerning the status of the constituent parts of the United Kingdom. The Scottish National Party demanded that London agree to another independence referendum. At the same time, the Democratic Unionist Party caused a deep political crisis in the Northern Ireland Assembly, protesting against the Northern Ireland Protocol, which was part of the package of agreements concerning the withdrawal of the United Kingdom from the European Union. Therefore, one could say that Brexit has caused new tensions (and deepened existing ones) for the division of power in the United Kingdom. On the one hand, these tensions are part of a wider process, also from a historical point of view. On the other hand, none of the decisions made so far has fundamentally shaken the foundations of the Westminster democracy model. However, it cannot be ruled out that in the long term, Brexit's political and constitutional consequences will be much more extensive in this respect.

Summary and Conclusions

The discussion concerning the impact of Brexit on majoritarian democracy in the United Kingdom boils down to a confrontation of two different interpretations of the events that followed the referendum of June 23, 2016. One of these interpretations is an attempt to prove the theory that the Westminster democracy model is slowly declining in a country that, according to Arend Lijphart, was a prime example of what this model is. It is supposedly confirmed by the changes that started to occur in the British political system even a few years before that, and the withdrawal referendum and the legal and constitutional chaos caused by the decision to withdraw were simply unfortunate outcomes of these changes. However, the analysis in this article shows that such conclusions go too far and are unjustified in many aspects.

The point of departure in the other interpretation is the assumption that changes are something natural in every country, and the model of democracy within which a country operates accumulates these changes and adapts to them. The case of the United Kingdom is much more in line with this concept of internal system changes and constitutional transformations. And if so, then we should look at Brexit as one of the many factors that have, over the last several decades, shaped majoritarian democracy in the United Kingdom, disrupting its functioning but also reflecting the natural evolution it has been undergoing. Some scholars even believe that Brexit was not so much a driving force behind these changes and transformations but one of their consequences (Giuliani, 2022, pp. 560–561).

This research perspective entails the need to emphasise the special importance of the European factor in the process. From the British point of view, membership in the European Union was never in line with the Westminster democracy model, which is based on competition and an adversarial style of politics. It is the attachment to these traditional values that generated opposition from British political elites, but also from British society, against the deepening and speeding up of European integration; it also determined the unwillingness to negotiate, reach a consensus, and cooperate at the supranational level – and all of these have always been the foundations of the politics of the European Communities and then the European Union. The consensus model, found, to varying degrees, on the Old Continent and based on striving for a compromise and on other principles allowing for going beyond cooperation between individual governments, is much more in line with the assumptions of European politics. This diversity of institutional conditions and the form of making politics in the United Kingdom and continental Europe, as well as the interrelation between the given democracy model and the support for European integration, seem crucial for understanding why the European Union had always been, in many aspects, a foreign entity for the British.

The hermetic nature of the Westminster model was also supposed to be a certain barrier against the impact of the social changes we all witnessed. But even this was impossible since British politics does not function in a vacuum. Over the last several decades, the Westminster democracy model has transformed in the United Kingdom, these being a result of, e.g., globalisation processes that impacted the behaviour of the voters of the particular political parties, which in turn affected the outcomes of elections: at times, deviating from the preconceived norm. Legal, political, and constitutional changes caused by the actions and decisions of the particular Cabinets have also made their mark on majoritarian democracy. From this point of view, the United Kingdom today is a completely different country than when it joined the European Communities, and even more so after World War II, where Arend Lijphart's analysis begins.

From the current perspective, Brexit plays a central role in this analysis. Its reasons constitute certain variables that show the transformation of the Westminster democracy model: what caused Brexit has also changed and will continue to change British democracy. Today, we do not know exactly where these changes will go, but, e.g., further devolution to

keep the unity of the United Kingdom cannot be ruled out. So far, many things suggest that Brexit was more of a consolidating factor for British democracy than an event that shook its foundations (Baldini, 2022). The future, however, remains unclear and seems difficult to predict. Regardless of the political or constitutional changes described in this article, it will also be important to how the British will find themselves in this new, post-Brexit reality – whether they will accept it or question it, thus questioning the legitimacy of Brexit itself. If the latter were to occur, the United Kingdom could face a much more far-reaching constitutional transformation than we think today.

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