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Comparing Upper Chambers Across the World

Paper Two: Composition and Selection

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Introduction

This is the second in a series of papers that explore and compare upper chambers across the world with the British House of Lords. By describing and analysing the variety of experiences that different countries have had with their upper houses, lessons can be learned. This topic has gained increased salience with the election of the Labour government in 2024, which has promised various reforms of the House of Lords in its election manifesto. This series of papers will provide information about upper houses in different countries to inform the debate over future reform of the Lords.

This paper will explore the composition and selection of different upper houses, considering issues such as size, methods of selection and the basis of composition. Building on the previous paper in this series, Canada, Australia, Germany and the United States will be the main cases for comparison, although other countries will also be considered. This paper will conclude that when compared to other upper houses, the Lords is a clear outlier in terms of its size, however, in terms of selection and composition it is not that unusual, with every upper house being a product of its historical context and creating its own unique series of advantages and disadvantages. Further papers in this series will examine the membership of upper houses, their powers and roles, as well as reforms to upper chambers across the world.

1. Composition and Selection of Upper Chambers

1.1 Upper chambers are extremely diverse. Whilst lower chambers, in general, tend to have a similar composition and role, when it comes to upper chambers there is no set model. This comes from the fact that there is no 'obvious answer' when it comes to upper chambers. The aims and tasks of the second chamber vary from country to country, much more so than lower chambers, which have a fairly clear democratic role. In terms of size, upper chambers can go from single digits to the high three figures. When it comes to selection, they can be fully elected, fully appointed, or something in between. The logic of composition also does not follow one single model. This means that comparing upper chambers can be extremely useful – since each bicameral nation has a different model, resulting from its unique democratic development, it is possible to 'pick and mix' the best aspects of each model when reforming an upper chamber, or creating a new one from scratch.

2. Size

2.1 Upper chambers vary in size. The largest legislative chamber in the world is the Chinese National People's Congress with 2,997 members; the second largest is the British House of Lords with 834.¹

¹ IPU Parline, "Current Number of Members: Compare Data on Parliaments," *Inter-Parliamentary Union*, February 6th, 2025, accessed February 6th, 2025, https://data.ipu.org/compare/?field=current_members_number®ion=0&structure=&chart=map&year_to=#;

In many ways, the size of the Lords makes it an international outlier. Not only is it large as a legislature, but it is also large as an upper house. The next largest upper house in the world is the French Senate with 348 members, less than half the size of the Lords, though this must be tempered with the fact that French Senators are full-time and are paid as such, unlike British peers.² The Lords is also an outlier in that it is the only upper house in the world larger than its lower counterpart.³ The international norm is for lower houses to be larger, often substantially so.⁴ Typically, lower houses tend to be between one-and-a-half times to five times bigger than their upper counterparts, although there are some extremes at either end. For example, the National Assembly of Bahrain has 40 members in both chambers of the legislature (a one-to-one ratio), whilst the House of Representatives of the Philippines is more than thirteen times bigger than the Senate of the Philippines.⁵

2.2 Table of Upper and Lower Chamber Sizes⁶

Country	Name of Lower House	Name of Upper House	Lower House Members	Upper House Members	Lower House to Upper House Ratio
Australia	House of Representatives	Senate	151	76	1.99
Canada	House of Commons	Senate	338	105	3.22
France	National Assembly	Senate	577	348	1.66
Germany	Bundestag	Bundesrat ⁷	733 ⁸	69	10.62
Ireland	Dáil	Seanad	174	60	2.90
Italy	Chamber of Deputies	Senate	400	205	1.95
Japan	House of Representatives	House of Councillors	465	248	1.88
Spain	Congress of Deputies	Senate	350	265	1.32
United Kingdom	House of Commons	House of Lords	650	834	0.78
United States of America	House of Representatives	Senate	435	100	4.35

UK Parliament, “Lords Membership,” *UK Parliament*, February 8th, 2025, accessed February 8th, 2025, <https://members.parliament.uk/parties/lords>.

² French Senate, “Senators,” *Senat.fr*, February 10th, 2025, accessed February 10th, 2025, <https://www.senat.fr/lng/en/senators.html>.

³ Henry Bolshaw, “Second Chambers Around the World: Size and Membership,” *UK Parliament*, September 5th, 2024, accessed February 10th, 2025, <https://lordslibrary.parliament.uk/second-chambers-around-the-world-size-and-membership/>.

⁴ R. L. Borthwick, “Methods of Composition of Second Chambers,” *Journal of Legislative Studies* 7, no. 1 (2001): 20.

⁵ IPU Parline, “Bahrain,” *Inter-Parliamentary Union*, February 6th, 2025, accessed February 6th, 2025, <https://data.ipu.org/parliament/BH/BH-LC01/>; Congress of the Philippines, “Legislative Information,” *Congress.gov.ph*, February 10th, 2025, accessed February 10th, 2025, <https://www.congress.gov.ph/legislative-information/for-students/>.

⁶ This table shows the legislatures of ten democracies that are comparable with the United Kingdom. Data on parliamentary membership taken from IPU Parline in February 2025. Lower house to upper house ratio calculated by the author.

⁷ Whilst formally the *Bundesrat* is not a classic second chamber since the German Basic Law establishes two legislative bodies rather than a lower and upper chamber of parliament, functionally the *Bundesrat* is an upper house; Matthias Niedobitek, “The German Bundesrat and executive federalism,” *Perspectives on Federalism* 10, no. 2 (2018): 208.

⁸ The 2021 size of the *Bundestag* was a result of ‘overhang’ and ‘levelling’ seats that stem from the mixed-member proportional representation electoral system. Since 2002, the minimum size of the chamber has been 598 seats, but it has often exceeded that, reaching 736 members and making it larger than the European

2.3 Overall, there is not much of a pattern when it comes to the size of upper chambers. The subject has only been studied in a limited way and only limited conclusions have been drawn.⁹ In general, like lower chambers, upper chambers tend to grow with population size.¹⁰ It can also be observed that the larger the lower chamber, the larger the upper chamber tends to be.¹¹ Above is a table showing the size of the legislatures of ten democracies that can be compared with Britain's own.

2.4 In some ways, the size of the House of Lords is not a problem. Since average attendance during the 2019-2024 session was 46%, there are few physical barriers given that the whole House does not attend all at once and the chamber has a possible capacity of up to 400 members (though in practice 200 is a more comfortable capacity).¹² Indeed, average attendance has never exceeded 500, which would put the Lords on par with the lower chambers of many other countries such as Japan and France.¹³ Moreover, as the Lords is well-known for the expertise of its members, it makes sense to draw from a large pool of peers. More peers should theoretically result in a greater amount of expertise, especially if peers are selected for that reason.

2.5 However, if the size of the Lords is excessive then this can become a problem. The Report of the Lord Speaker's Committee on the Size of the House (Also known as the 'Burns Report') argued that since there was no fixed cap on the number of Peers the size of the House has continued to grow, and that this has become untenable.¹⁴ In modern times, the size of the House has continued to increase, with the only major fall occurring as a result of the House of Lords Act 1999, when the majority of hereditary peers were excluded. This reduced the size of the chamber from a record 1,330 to back under 700.¹⁵ Current membership of the House stands at 834, despite changes like the House of Lords Reform Act 2014, which allowed peers to resign and retire, something that was previously unavailable to life peers.¹⁶

2.6 Allowing the Lords to continue to grow to an 'unsustainable' size, would, according to the Burns Report, bring the House under strain, prevent it from working in an efficient manner, increase the costs of the House and tarnish its reputation.¹⁷ In response, the committee recommended reducing the size of the Lords to 600 and capping it at that number, as well as setting fixed fifteen-year terms and reforming the appointments system to ensure there is a fair allocation. The report was supported by the majority of speakers during a House of Lords debate, with Lords Burns stating that

Parliament. Due to changes in electoral law, the 2025 *Bundestag* will have a fixed 630 members; Sven T. Siefken, "Electoral Reform in Germany: An End to a Never-ending Story?," *American-German Institute*, August 15th, 2024, accessed February 10th, 2025, <https://americangerman.institute/2024/08/electoral-reform-in-germany/>.

⁹ Rein Taagepera and Steven P. Recchia, "The Size of Second Chambers and European Assemblies," *European Journal of Political Research* 41, no. 2 (2002): 168.

¹⁰ Taagepera and Recchia, "The Size of Second Chambers," 172.

¹¹ Taagepera and Recchia, "The Size of Second Chambers," 173

¹² Henry Bolshaw, "Lords Reform: Membership, Attendance, Voting and Participation Data (2019-2024 Parliament)," *UK Parliament*, September 16th, 2024, accessed February 11th, 2025, <https://lordslibrary.parliament.uk/lords-reform-membership-attendance-voting-and-participation-data-2019-2024-parliament/>.

¹³ UK Parliament, "Average Attendance for Previous Sessions," *UK Parliament*, February 11th, 2025, accessed February 11th, 2025, <https://www.parliament.uk/about/faqs/house-of-lords/faqs/lords-sittings/>.

¹⁴ Lord Speaker's Committee on the Size of the House, *Report of the Lord Speaker's Committee on the Size of the House*, First Report, (London: Lord Speaker, 2017), 8, accessed February 11th, 2025, <https://www.parliament.uk/globalassets/documents/lords-committees/size-of-house/size-of-house-report.pdf>.

¹⁵ Lord Speaker's Committee, *Report on the Size of the House*, 8.

¹⁶ IPU Parline, "Current Number of Members".

¹⁷ Lord Speaker's Committee, *Report on the Size of the House*, 8-9.

‘there is substantial consensus about the need for reform and... there is a lot of support for the proposals.’¹⁸ However, the size of the House has still not been reduced.

2.7 Whilst Prime Minister Theresa May was receptive to the report, Prime Minister Boris Johnson was less so, and there was considerable controversy regarding his appointments, with issues being raised both to their quantity and appropriateness.¹⁹ Concerns about the size of the House seem unlikely to fade; though the exclusion of the remaining hereditary peers would reduce numbers, appointments are in the hands of the Prime Minister and are almost unconstrained meaning that a large number of new peers may still be appointed, and there remains no Prime Ministerial buy-in to the Burns Report’s recommended ‘two-out, one-in’ formula.

2.8 Overall, it can be said that the size of the House of Lords is unusual. It is the largest upper house in the world by quite some margin, and it is larger than all but one of the lower houses. It is the only upper house in the world that is larger than its lower house. In terms of size then, the Lords is an international outlier. However, it is important to remember that a focus on pure numbers can exaggerate the size of the Lords given the part-time nature of the House. Whilst opinions vary on how much this matters, there is widespread agreement that the Lords should be reduced. Even at a reduced size House of Lords may still be large (in terms of the number of members) when compared to upper houses around the world, but there is no reason why it would not continue to live up to its reputation as a second chamber, indeed, it would be better functioning and more efficient.

3. Basis of Composition

3.1 As discussed in Paper One of this series, upper houses have different functions than lower houses. Whilst lower houses are often designed to reflect the democratic desires of the people, upper houses play a different role, and this can affect the basis of composition of their members. Professor Meg Russell has identified several different models of bicameralism which provide different justifications for the composition of upper houses.²⁰

The Elite Model

3.2 One model is described as the *elite model* whereby the second chamber represents a financial and political elite.²¹ Whilst this model was popular in Europe, especially historically, and served to represent the interests of groups like the aristocracy and the clergy, many upper chambers have since been abolished or reformed – the House of Lords is unusual in that it is a remaining example of the elite model, though one adapted for the realities of a 21st century democracy.

The Territorial Model

3.3 Another model of upper chambers is the *territorial model*.²² This model also has early historical beginnings, originating with the creation of the modern federal state, where it became important to

¹⁸ Philip Norton, “What’s the Point? Resolving the Conundrum of Second Chambers,” *Journal of International and Comparative Law* 10, no. 1 (2023): 6; House of Lords, “Lord Speaker’s Committee Report, HL Deb, December 19th, 2017, vol 787, col. 2107, accessed March 4th, 2025, <https://hansard.parliament.uk/Lords/2017-12-19/debates/B1BAFA9E-A6DC-4748-AF63-F877404342C6/HouseOfLordsLordSpeaker%E2%80%99SCommitteeReport>.

¹⁹ Lord Speaker’s Committee on the Size of the House, *Report of the Lord Speaker’s Committee on the Size of the House*, Fifth Report, (London: Lord Speaker, 2023), 1, accessed February 11th, 2025, <https://committees.parliament.uk/publications/40909/documents/199241/default/>.

²⁰ Meg Russell, *The Contemporary House of Lords: Westminster Bicameralism Revived*. (Oxford: Oxford University Press, 2013), 42-46.

²¹ Russell, *The Contemporary House of Lords*, 45.

²² Russell, *The Contemporary House of Lords*, 43.

ensure that each part of the nation was adequately represented. The Swiss Confederation in the 13th century had a system like this, where the legislature comprised of ambassadors from the different Swiss cantons; only later did this legislature become democratically elected.²³ The classic example of this model comes from the United States. The country adopted a first chamber along the lines of the Westminster model, with the allocation of seats based on population to ensure that every citizen was equally represented. However, this caused concerns from the smaller states who worried they would be overruled too often. A compromise between the larger states and smaller states was reached through the creation of a Senate where each state received an equal number of representatives, regardless of population. The two chambers were given co-equal powers so that no law could be made without the support of both the people, and the states.²⁴

3.4 The territorial model also applies to Canada and Australia, where the states are represented in the upper house. Both countries are federal and so their upper houses have a territorial role: to balance the interests of the people with the interests of the provinces.

3.5 In Australia, each of the six states elect twelve Senators each. Two Australian territories are entitled to elect two Senators each, bringing the total to 76. The Senate is co-equal to the House, with its powers being equivalent, apart from the fact that it cannot originate nor amend money bills.²⁵ This fact, along with the written constitution has led the Australian system to be dubbed the 'Washminster Model', drawing as much from Washington as it does from Westminster.²⁶

3.6 In contrast, the Canadian Senate is an appointed chamber, and one that is less powerful than the Canadian House of Commons. Its function is to be a chamber of 'sober second thought', in the words of the first Canadian Prime Minister John A. Macdonald.²⁷ The Senate has a fixed number of seats: 105, allocated to the provinces and territories.²⁸ Some provinces form their own division in the Senate, giving them 24 senators each, whilst others join together to form a division – Alberta, British Columbia, Manitoba and Saskatchewan for example, have six Senators each forming the Western Provinces Division in the Senate. Four divisions have 24 senators each, the territories have three senators in total and Newfoundland and Labrador have an additional six senators bringing the total to 105. Whilst not equally represented like in the United States, Canada's least populated provinces have a disproportionate number of Senators.

3.7 Despite the fact that Canada and Australia follow the territorial model, the behaviour of their upper chambers remains largely unaffected, making their territorial role only nominal. Though members are meant to represent their states and provinces, this does not occur much in practice as members sit and vote in party groups (at least they did before Canada's 2014 and 2016 Senate reforms which were designed to make the chamber less partisan).²⁹ Party groups are powerful in Australia, and were powerful in Canada, but even setting that aside, there is still a lack of formal territorial powers for these two upper chambers as they have no special territorial debates or

²³ Meg Russell, "The Territorial Role of Second Chambers," *Journal of Legislative Studies* 7, no. 1 (2001): 105.

²⁴ Russell, "The Territorial Role of Second Chambers," 106.

²⁵ John Uhr, "Explicating the Australian Senate," *Journal of Legislative Studies* 8, no. 3 (2002): 4.

²⁶ Elaine Thompson, "The 'Washminster' Mutation," *Politics* 15, no. 2 (1980): 32-40.

²⁷ Thomas Brown, *Canadian Senate Reform: Recent Developments*, House of Lords Library Note, LLN 2016/046, (London: House of Lords Library, 2016), 1, accessed February 20th, 2025, <https://researchbriefings.files.parliament.uk/documents/LLN-2016-0046/LLN-2016-0046.pdf>.

²⁸ Thomas Brown, "Canadian Senate Reform: What Has Been Happening?," *UK Parliament*, March 17th, 2020, accessed February 13th, 2025, <https://lordslibrary.parliament.uk/canadian-senate-reform-what-has-been-happening/>.

²⁹ Russell, "The Territorial Role of Second Chambers," 113.

committees.³⁰ In Australia, this perceived limitation has led the Senate to be described as a ‘House of Review’ rather than a ‘States House’, meaning that it is closer to a House of Lords-style chamber of second opinion, rather than a body with a unique perspective based on its composition.³¹

3.8 A final example of a territorial chamber worth considering is the German *Bundesrat*. Germany is a federal state made up of sixteen *Länder* or states, that are represented in the upper house. The *Bundesrat* has 69 members with each *Länder* sending between three and six members; the smaller states send fewer members, but they are still disproportionately represented. It is known as the ‘very federal house’ because of its unique membership.³² Each state delegation to the *Bundesrat* is appointed by the state executive and these members vote on a state basis since they do not have a free mandate. The body does not have fixed legislative periods, and its members frequently rotate because there are no set terms.

3.9 The contrast between the Canadian and Australian examples of the territorial model and the German example are illustrative because they show that an upper house must exercise its territorial role in order to achieve proper territorial representation rather than just rely on its historical basis of composition. The fact that the *Bundesrat* members sit and vote in territorial groups rather than by party, and that they report to territorial assemblies means that the chamber is very effective in its constitutional role.³³

The Vocational Model

3.10 Other models of upper chambers can focus on groups rather than territorial or class minorities such as linguistic minorities, as is the case with the Belgian Senate, or religious minorities.³⁴ Upper chambers can also adopt an entirely different basis of composition, as the example of the Irish *Seanad* shows, which would fall under the *vocational model*. In this model, the upper chamber is designed to represent different sectors of society such as professions and interest groups like farmers, medical professionals and teachers. Currently, the *Seanad Éireann* has 60 members, of which 43 are elected from five vocational panels (the Administrative, Agricultural, Cultural and Educational, Industrial and Commercial, and Labour Panels) by members of the lower house, outgoing senators and local government representatives. Of the rest of the members, six are linked to the universities and are elected by graduates of the National University of Ireland and the University of Dublin, whilst eleven are appointed by the *Taoiseach*.³⁵

3.11 In theory the vocational model should ensure that all sectors of society are represented, and bring their own expertise to the role, in practice, the vocational aspect is very weak indeed. Although nominees by the vocational panels are required to have ‘knowledge or practical experience’ of the relevant vocation, this requirement has been interpreted only loosely meaning that the *Seanad* is arguably not really vocational. Instead, since the nomination process and elections are tightly controlled by political parties, the vocational members are not independent in nature as

³⁰ Russell, “The Territorial Role of Second Chambers,” 113; David, C. Docherty, “The Canadian Senate: Chamber of Sober Reflection or Loony Cousin Best Not Talked About,” *Journal of Legislative Studies* 8, no. 3 (2002): 33.

³¹ Richard Mulgan, “The Australian Senate as a ‘House of Review,’” *Australian Journal of Political Science* 31, no. 2 (1996): 192; Campbell Sharman, “The Australian Senate as a States House,” *Politics* 12, no. 2 (1977): 64-66.

³² Russell, “The Territorial Role of Second Chambers,” 114.

³³ Meg Russell, *Representing the Nations & Regions in a New Upper House: Lessons from Overseas*. (London: Constitution Unit, 1999), 11-13.

³⁴ Russell, *The Contemporary House of Lords*, 44.

³⁵ Meg Russell, *A Vocational Upper House?: Lessons from Ireland*, (London: Constitution Unit 1999) 2-3.

was originally intended.³⁶ Whilst a vocational model may seem like a good idea, in practice, it is tricky to implement especially if it is elected; the appointed members of the Lords may do a better job ensuring that a wide range of professions and vocations are represented than the formally vocational model of the Irish upper house.

The Partisan Model

3.12 A final model of upper houses is the *partisan model*.³⁷ In this model, the focus is still on representation, but this time through different voting systems. The purpose of this model is to have a system designed to bring about different majorities in each chamber so that the two chambers are not merely mirrors of one another. For example, whilst the Australian House of Representatives uses the Alternative Vote, a majoritarian system, the Senate uses the Single Transferable Vote, a form of proportional representation. This has meant that the government rarely has a majority in both the House and Senate, acting as a check on power.³⁸ The House of Lords can also be described as an example of the partisan model, ironically because of its unpartisan nature; the 20% or so of peers that are non-partisan crossbenchers, weaker party discipline and greater independence by members ensures that it is very difficult for any one party to engineer a guaranteed majority.

3.13 Whilst the different models of composition are a useful way of categorising upper chambers, an upper chamber may fall into one category, several, or none at all. Instead, the models help to shine a light on the historical development of upper chambers, as covered in Paper One. The powers and roles of upper chambers will be covered in future papers.

4. Method of Selection

4.1 Upper chambers have a variety of methods of selecting their members. In modern democracies, lower chambers are elected on a universal franchise – the electoral system may vary, but the broad method remains the same. Due to varying historical circumstances, and differing bases of composition, upper houses can run the range from fully elected, to fully appointed, to somewhere in between.

Direct Election

4.2 Direct election is in some ways the obvious method of selection; if it is good enough for the lower house, then it should be good enough for the upper house too. However, it is not as obvious and popular as its proponents think. According to Professor Russell's categorisation of all 76 national second chambers from 2011, there are only five countries with wholly elected second chambers that are parliamentary democracies.³⁹ Updated information from February 2025, as can be seen in the appendix, suggests a similar result today. Out of 80 second chambers, only six parliamentary democracies have wholly elected second chambers. A further thirteen presidential democracies have a directly elected second chamber, meaning that only 24% of democracies have a wholly directly elected second chamber.

4.3 Direct election as a method of selection does have some advantages: it increases the democratic legitimacy of the chamber as well as voters' engagement with it. However, direct election has

³⁶ Russell, *A Vocational Upper House?*, 3-4; Muiris MacCarthaigh and Shane Martin, "Precarious Bicameralism? Senate in Ireland from the Late Middle Ages to the Present," in *Reforming Senates: Upper Legislative Houses in North Atlantic Small Powers 1800-Present*, ed. Nikolaj Bijleveld, Colin Grittner, David Smith, Wybren Versteegen, (London: Taylor and Francis, 2019), 244.

³⁷ Russell, *The Contemporary House of Lords*, 45.

³⁸ Uhr, "Explicating the Australian Senate," 17-19.

³⁹ Meg Russell, "Elected Second Chambers and Their Powers: An International Survey," *The Political Quarterly* 83, no. 1 (2012): 120.

downsides as well. It can also create tension with the lower house: if the membership of the two chambers is too similar in nature the upper chamber can become truly 'redundant' by not performing a different function from the lower chamber. Alternatively, if the upper chamber is too powerful (partially on account of its democratic legitimacy) then this can create the risk of gridlock.

4.4 In order to reduce these issues several approaches can be taken.⁴⁰ A different electoral system can be adopted for each house to ensure a different result and make-up, as is the case in Australia for example, where the House of Representatives uses a majoritarian election system whilst the Senate uses a proportional system resulting in a relatively large number of crossbench and minor party representatives.⁴¹ Another solution is to create staggered terms so that both houses are not elected at the same time, or elected all at once, thus only reflecting the temporary political mood of the day. The Japanese House of Councillors, for example, has members who serve six-year terms, with half of the chamber being elected every three years. Finally, membership restrictions can also be placed on directly elected members. This is often done in terms of age. In the United States, you can be a Representative from the age of 25, but a Senator from the age of 30, and President from the age of 35, originally aiming to ensure that different sorts of people are elected to each position.

Indirect Election

4.5 Another method of selection for upper houses is indirect election. Eighteen upper houses are fully indirectly elected, whereas nineteen include some method of indirect election. This form of selection means that the upper house is chosen by a select electorate of those that have been directly elected in the first place. In France, local councillors and MPs elect senators, arguably giving the chamber a rural and right-wing slant. In Ireland, most senators are chosen by councillors and MPs, though from a nominally vocational group of candidates. A final example of indirect election is the *Bundesrat* where members are chosen from democratically elected state governments.⁴² From these examples it is also clear to see that indirect election is often used by states that have a territorial basis of composition for the upper house, creating a bridge between the regions and the legislature. This method of selection is seen as a good balance between direct election and appointment, avoiding both the potential gridlock of direct election and the perceived lack of democratic legitimacy of appointment.

Appointment

4.6 Upper houses can also be appointed. Fifteen upper houses are currently wholly appointed, and by and large these are in Commonwealth countries such as Jamaica, Grenada and Canada.⁴³ The Lords is unique in that it is majority appointed, and minority hereditary, with the hereditary aspect being unusual. Whilst the Belgian Senate used to have 'Senators by right' taken from the monarchy, this was abolished in 2013, leaving the United Kingdom as the only Western democracy with a hereditary element, though Zimbabwe and Lesotho have hereditary representation in the upper house in the form of chiefs to this day.

4.7 Appointment can ensure that members of the house are not drawn into the everyday business of democratic politics and so should be more concerned with acting out their legislative role rather than being re-elected. In the Lords, appointment can be argued to result in the house having a large number of members who are experts in their fields (this shall be covered in more detail in a future paper), though in places such as the Canadian Senate appointments (pre-reforms) were said to be

⁴⁰ Russell, *The Contemporary House of Lords*, 48-49.

⁴¹ Ian McAllister, and Damon Muller, "Electing the Australian Senate: Evaluating the 2016 Reforms," *Political Science* 70, no. 2 (2018): 152-153.

⁴² Russell, *The Contemporary House of Lords*, 49.

⁴³ Russell, "Elected Upper Chambers and Their Powers", 120.

too politicised for this to be the case.⁴⁴ As a method of selection, appointment can face some criticism in terms of a lack of democratic legitimacy, however, it has its upsides as well and is not as unusual and anachronistic as is sometimes portrayed.

4.8 As should be clear from this overview, there are successful and functional upper houses across the world that use all three major methods of selection. There is also a large number of upper houses that use a combination of methods. Drawing on IPU data, from the 80 countries for which data was available, about 65% are wholly composed of one method of selection, whilst 35% are composed from a mix of one or more methods, with an indirectly elected majority and an appointed minority being the most popular of these mixed approaches. There is no one method of selection that is dramatically more popular than the other, with each method (directly elected, indirectly elected, appointed, and mixed) being used by about a quarter of bicameral countries, although mixed selection is most popular. Below is a table that illustrates the different methods of selection and basis of composition used by some upper houses. The appendix also features a full version of this table which looks at methods of selection of upper houses (Table 6.1).

4.9 Table of Upper Chamber Composition and Selection⁴⁵

Country	Name of Upper House	Method of Selection	Basis of Composition ⁴⁶
Australia	Senate	Wholly directly elected	Partisan/Territorial
Canada	Senate	Wholly appointed	Elite/Partisan/Territorial
France	Senate	Wholly indirectly elected	Partisan/Territorial
Germany	Bundesrat	Wholly indirectly elected	Territorial
Ireland	Seanad	Majority indirectly elected, plus directly elected and appointed	Vocational
Italy	Senate	Majority directly elected, minority appointed	Territorial
Japan	House of Councillors	Wholly directly elected	Partisan/Territorial
Spain	Senate	Majority directly elected, minority indirectly elected	Territorial
United Kingdom	House of Lords	Majority appointed, minority hereditary	Elite/Partisan
United States of America	Senate	Wholly directly elected	Territorial

5. Further Papers

Looking ahead to further papers in this series, the next paper will cover the membership of upper houses and how the Lords compares to its international counterparts. Future papers will also consider the role and powers of upper houses, as well as both successful and unsuccessful experiences of upper chamber reform.

⁴⁴ Meg Russell, *An Appointed Upper House: Lessons from Canada*, (London: Constitution Unit 1998), 5.

⁴⁵ This table shows the upper houses of ten democracies that are comparable with the United Kingdom. Data on methods of selection taken mainly from IPU Parline. Data on basis of composition taken from Meg Russell and the author.

⁴⁶ Categories for basis of composition are not always clear-cut, and the author's judgement was used to decide which model fit each country best. Often countries may fall under more than one model, or not cleanly fit into either. For more detail see section 4 above.

6. Appendix

6.1 Table of National Second Chambers by Method of Selection and Regime Type⁴⁷

	Parliamentary (38)	Presidential (42)
Wholly directly elected (19)	Australia, Czech Republic, Japan, Poland, Romania, Switzerland (6)	Argentina, Bolivia, Brazil, Chile, Dominican Republic, Liberia, Mexico, Nigeria, Palau, Paraguay, Philippines, United States, Uruguay (13)
Wholly indirectly elected (18)	Austria, Belgium, Bosnia and Herzegovina, Ethiopia, France, Germany, Morocco, Netherlands, Pakistan, Slovenia, Somalia, South Africa, Tunisia (13)	Congo, Democratic Republic of Congo, Namibia, Russia, Thailand (5)
Wholly appointed (15)	Antigua and Barbuda, Bahamas, Barbados, Belize, Canada, Grenada, Jamaica, Jordan, Saint Lucia, Trinidad and Tobago (10)	Bahrain, Gabon, Oman, South Sudan, Yemen (5)
Majority directly elected, minority indirectly elected (1)	Spain (1)	
Majority directly elected, minority appointed (6)	Italy (1)	Bhutan, Colombia, Egypt, Equatorial Guinea, Kenya (5)
Majority directly elected, minority hereditary (1)		Zimbabwe (1)
Majority indirectly elected, plus directly elected and appointed (1)	Ireland (1)	
Majority indirectly elected, minority appointed (15)	Cambodia, India, Nepal (3)	Algeria, Belarus, Burundi, Cameroon, Chad, Côte d'Ivoire, Kazakhstan, Madagascar, Rwanda, Tajikistan, Togo, Uzbekistan (12)
Majority appointed, minority indirectly elected (2)	Malaysia (1)	Eswatini (1)
Majority appointed, minority hereditary (1)	United Kingdom (1)	
Majority hereditary, minority appointed (1)	Lesotho (1)	

⁴⁷ Table based on Meg Russell, "Elected Upper Chambers and Their Powers", I20, with data updated for February 2025, taken from IPU Parline. Countries with suspended or non-functioning upper houses were excluded. Data on regime type taken from CIA World Factbook. Edge cases classified by author.

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