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**THE COMPARISON OF TÜRKİYE AND FRANCE POLITICAL
SYSTEMS: 2014-2018 PERIOD**
TÜRKİYE VE FRANSA SİYASAL SİSTEMLERİNİN
KARŞILAŞTIRILMASI: 2014-2018 DÖNEMİ

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Abstract

Government systems are categorised as presidential, semi-presidential and parliamentary systems. The categorisation is based on the relationship between the legislative, executive and judicial powers. The aim of this study is to compare the semi-presidential systems of Türkiye and France and to identify the mechanism through which power is concentrated. The dynamics of Türkiye's semi-presidential system, the division of powers and the way the balance of powers is formed will form the basis of the study. Accordingly, Türkiye's political system between 2014-2018 will be compared with France. The only reason for choosing 2014 as the beginning of the study is that the 'election of the President by the people', which was accepted as a result of the referendum held in October 2007 in Türkiye, came into force for the first time with the presidential elections held in 2014. The reason for limiting the study to 2018 is that the transition to the 'Presidential Government System' was accepted with the referendum held in April 2017 in Türkiye and entered into force with the elections held in June 2018. It is theoretically possible to say that Türkiye, which has been governed by the parliamentary system since the 1960s, has been governed by the parliamentary system until 2018. However, considering the actual situation between 2014-2018, it is possible to say that the semi-presidential system was implemented. The claim that the Semi-Presidential System was practically implemented in Türkiye between the election of the president by the people, which came into force for the first time in 2014 after the 2007 referendum, and 2018, when the Presidential Government System, which was accepted with the referendum held in 2017, came into force, formed the basis of this study. The study is a qualitative study. In addition, descriptive methods, historical research theories and document analysis will be applied.

Keywords: Government Systems, Comparison of Political Systems, Türkiye, France

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Özet

Hükümet sistemleri başkanlık, yarı-başkanlık ve parlamenter sistemler olarak sınıflandırılmaktadır. Bu sınıflandırma yasama, yürütme ve yargı erkleri arasındaki ilişkiye dayanmaktadır. Bu çalışmanın amacı, Türkiye ve Fransa'nın yarı-başkanlık sistemlerini karşılaştırmak ve gücün hangi mekanizma aracılığıyla yoğunlaştığını tespit etmektir. Türkiye'nin yarı-başkanlık sisteminin dinamikleri, kuvvetler ayrılığı ve kuvvetler dengesinin nasıl oluştuğu çalışmanın temelini oluşturacaktır. Bu doğrultuda, Türkiye'nin 2014-2018 yılları arasındaki siyasal sistemi Fransa ile karşılaştırılacaktır. Çalışmanın başlangıcı olarak 2014 yılının seçilmesinin tek nedeni, Türkiye'de Ekim 2007'de yapılan referandum sonucunda kabul edilen 'Cumhurbaşkanının halk tarafından seçilmesi' ilk kez 2014 yılında yapılan Cumhurbaşkanlığı seçimleri ile yürürlüğe girmiş olmasıdır. Çalışmanın 2018 yılı ile sınırlandırılmasının nedeni, Türkiye'de Nisan 2017'de yapılan referandum ile 'Cumhurbaşkanlığı Hükümet Sistemi'ne geçişin kabul edilmesi ve Haziran 2018'de yapılan seçimler ile yürürlüğe girmesidir. Teorik olarak 1960'lardan bu yana parlamenter sistemle yönetilen Türkiye'nin 2018 yılına kadar da parlamenter sistemle yönetildiğini söylemek mümkündür. Ancak 2014-2018 yılları arasındaki fiili durum dikkate alındığında yarı başkanlık sisteminin uygulandığını söylemek mümkündür. Türkiye'de 2007 referandumundan sonra 2014 yılında ilk kez yürürlüğe giren cumhurbaşkanının halk tarafından seçilmesi ile 2017 yılında yapılan referandumla kabul edilen Cumhurbaşkanlığı Hükümet Sisteminin yürürlüğe girdiği 2018 yılları arasında Yarı Başkanlık Sisteminin fiilen uygulandığı iddiası bu çalışmanın temelini oluşturmuştur. Çalışma nitel bir çalışmadır. Ayrıca betimsel yöntemler, tarihsel araştırma kuramları ve doküman analizi uygulanacaktır.

Anahtar Kelimeler: Hükümet Sistemleri, Siyasi Sistemlerin Karşılaştırılması, Türkiye, Fransa

INTRODUCTION

Modern governments generally fall into three categories: parliamentary, presidential, and semi-presidential. Parliamentary systems feature interdependence between the executive (led by a prime minister) and legislative branches. Presidential systems have a strict separation of powers, with a president leading the executive branch independently. Semi-presidential systems blend these two, featuring both a president and prime minister who share executive power. The core difference between these systems lies in how they structure the relationship between the legislative and executive branches.

In Türkiye, the Parliamentary System of Government was implemented with the 1921 constitution and a mixed system between the Parliamentary System of Government and the Parliamentary System was implemented with the 1924 constitution. The implementation of pure parliamentary system in Türkiye started with the 1961 constitution and continued with the 1982 constitution. With the 1982 constitution, the parliamentary government system (as a result of the referendum held on 16 April 2017) continued until the general elections in 2018. With the elections in 2018, the system described as the 'Presidential Government System' was adopted and is still being implemented. In France, with the amendment made to the 1958 constitution in 1962, a semi-presidential system was adopted and it has been governed by this system until today.

The main argument of this study is to examine the process that started with the popular election of the president, accepted after the referendum held on 21 October 2007 in Türkiye, and the use of this practice for the first time as a result of the presidential elections held on 10 August 2014, before the government system, which was the result of the referendum on 16 April 2017 and entered into force in 2018. This examination will examine the implementation of the constitution of

France, which came into force as a result of the referendum of 28 September 1958, from the day of the transition to the semi-presidential system as a result of the amendment made in 1962 to the present day, and whether the government system in Türkiye between 2014-2018 has been switched to the semi-presidential system in practice rather than theory. The basic assumption of the study is that in the semi-presidential system in Türkiye, the power is concentrated in the president compared to the French semi-presidential system.

Firstly, government systems are defined in this study and the historical processes of government systems in both Türkiye and France are briefly mentioned. Then, the constitutional powers of the legislative and executive powers are analysed. Subsequently, these governmental structures of Türkiye and France are compared. The comparison is based on the distribution of powers and duties between the president, the parliament and the prime minister, the election of organs, the mechanisms of influencing each other (veto), and the appointment methods of senior officials. As a result of the comparison, it is aimed to determine the distribution of 'power' between the president, prime minister and parliament in each country and to identify the mechanism where power is concentrated.

This study is a qualitative research in general. As supporting elements of qualitative research, descriptive research method and historical research methods were used to answer the question of whether the semi-presidential system was actually implemented in Türkiye between 2014-2018 by comparing the legislative and executive powers of Türkiye and France.

GOVERNMENT SYSTEMS

There is no clear and single definition agreed upon in the literature on the definition of government systems. However, it is possible to describe government systems as the whole set of rules applied in non-democratic regimes and/or constitutional democracies in terms of the organisation and distribution of power within the state power (Hekimoğlu, 2009: 5). In a study by Gökçe (2019), government systems are defined as 'a set of institutions and rules that are classified today as a result of the effort to find the best form of government and that explain the establishment, functioning and interrelation of the powers within an organised state with unique expressions'. The basis of government systems lies in the relationship between the legislative, executive, and judicial powers, which are categorized into presidential, parliamentary, and semi-presidential systems. In a presidential system, such as that of the United States, there is a rigid separation of powers, with the executive (president) and legislature operating independently under a system of checks and balances. In contrast, a parliamentary system, like the United Kingdom's, features a fusion of powers, where the executive (prime minister and cabinet) is drawn from and accountable to the legislature, creating a softer, more interdependent relationship. A semi-presidential system, exemplified by France, combines elements of both, with a directly elected president sharing power with a prime minister accountable to the legislature, resulting in a dual executive structure. These systems reflect different approaches to balancing power, with each offering distinct advantages and challenges based on a nation's political and historical context (Gökçe, 2019: 183).

Presidential System

The country where the presidential system was born, grew and developed is the United States of America (USA). Some of the most prominent and distinguishing features of this system are the election of the president by the people, the

president's sole use of executive power and the sharp implementation of the separation of powers (legislative, executive and judicial) (Gözübüyük, 2013: 37). In the presidential system, executive and legislative elections are held in different time periods. In this system, neither the executive power has the authority to overthrow the legislative power nor the legislative power has the authority to overthrow the executive power (Kaynar, 2017: 320). In the presidential system, a 'checks and balances' mechanism has been established in order to eliminate the breakdown in relations between the legislative and executive powers (Gözübüyük, 2013: 37). The USA, which was originally a British colony, has included the separation of powers as the most fundamental principle in its constitution. This obvious presidential system structure in the USA has secured itself especially by using checks and balances mechanisms, and the checks and balances system aims to prevent possible political monopoly and political abuse. Presidential systems are characterized by a strict separation of powers, where the president, as head of the executive branch, is elected for a fixed term and does not require a vote of confidence from the legislature. This independence is a defining feature, distinguishing presidential systems from parliamentary ones. However, despite this separation, the executive and legislative branches are interdependent. The legislature typically controls the budget, giving it significant influence over the president's agenda. Conversely, the president often possesses veto power over legislation passed by the legislature, creating a system of checks and balances. This necessitates cooperation and negotiation between the two branches, as the president needs legislative support for funding and the legislature must consider the president's potential veto. Further examples of this interdependence include presidential appointments requiring legislative confirmation and treaty ratification often needing legislative consent. While the separation of powers is fundamental, it is the interaction and interdependence between the branches that allows the government to function effectively (Ekinci and Yıldırım, 2017: 135-136).

In the presidential system, where there is a deep difference between the executive and legislative powers, there is a sharp balances and check system between the executive and legislative powers. In the USA, one of the countries that the presidential system is effectively implemented, the executive power consists of a single person. This person/authority is elected by the people. Besides, the legislative power consists of a structure (parliament) with one or two chambers elected by the people. The election of these two parliaments is completely independent of each other. The executive power does not have the power to overthrow the legislative power and the legislative power does not have the power to dissolve the executive power. However, the president can veto the laws enacted by the legislative power. On the other hand, the budget prepared by the president can be rejected by the parliament (Kuzu, 1996: 14). Dual legitimacy emerges in a situation where the losing party loses everything and the winning party gains everything due to the rigidity of the system and the election results. One of the weaknesses of the presidential system is that the losing party, which becomes the opposition, is less able to control the executive power until the next election. Strong and stable government is among the advantages of the presidential system. It should not be forgotten that if there is a president whose powers are expanded in the presidential system, the legislative power loses its function, and the checks and balances between the powers work in favour of the executive power, it will be usual for this system to move away from democratic values (Tunçkaşık, 2017: 4-7).

Parliamentary System

Sirey (2002) defined the parliamentary system as ‘a form of government based on the co-operation of powers, in which the government and the legislature have common spheres of activity and mutual means of action’ (Sirey, 2002: 83 cited in Kaboğlu, 2019: 138). England is accepted as the cradle of the parliamentary system. This is because this system has completed its institutionalisation process within the social conditions and traditions of England. The cornerstone of this system, which is based on elections, is the existence of a representative government that is responsible to the parliament. (Gözübüyük, 2013: 31; Bağce, 2016: 21).

In the parliamentary system, the executive branch has two (dualist) heads. In this structure, it is the head of state/president who is irresponsible (what is meant by irresponsibility is ‘political irresponsibility’). The prime minister represents the executive branch and is responsible. In this structure, the head of state has a complementary, inclusive, stimulating and conciliatory position. He closely follows the government policies and supports the government in some cases and criticises it in others. In this system, which has a dual structure, there is a government responsible to the parliament. This appointed government takes office after receiving a vote of confidence from the parliament (assembly). One of the general characteristics of the parliamentary system is that ‘the government is generally based on an absolute majority in parliament’. Moreover, stable, strong and decisive governments are formed by political parties that have won an absolute majority in parliament. In this system of government, ministers are responsible and accountable to the parliament both individually for their policies and actions and collectively with the ministers and the prime minister for the policies developed by the council of ministers. Another basic feature of the parliamentary system is that the executive and legislative powers act within the framework of a mechanism of mutual influence and cooperation (Gözübüyük, 2013, pp. 31-32; Aksu, 2021, p. 27).

Semi-Presidential System

France is widely regarded as the birthplace of the semi-presidential system. At the heart of this system lies a dual executive structure, where executive power is divided between two key figures: the president, who is directly elected by the people, and the prime minister, along with the cabinet, who are accountable to the parliament. This unique arrangement creates a shared authority framework, in which the head of state (the president) and the head of government (the prime minister) coexist, each with distinct roles and responsibilities. A defining feature of this system is the president's ability to operate independently of the prime minister and parliament, without being directly accountable to them. In contrast, the prime minister and ministers must secure and maintain the confidence of the parliament, to which they are ultimately accountable. This dual authority structure ensures a balance of power within the executive branch, allowing both the president and the prime minister to function autonomously within their respective domains. However, this duality also introduces the potential for shifts in the balance of power within the executive branch. Depending on political dynamics, the collaboration between the prime minister and the president can evolve, leading to the emergence of new power centers and altering the traditional equilibrium. This flexibility is both a strength and a challenge of the semi-presidential system, as it allows for adaptation to changing political circumstances while requiring careful management to avoid conflicts or inefficiencies (Erdoğan, 2011: 23; Aksu, 2021: 29).

Presidential systems are characterized by a strict separation of powers, where the president, as head of the executive branch, is elected for a fixed term and does not require a vote of confidence from the legislature. This independence is a defining feature, distinguishing presidential systems from parliamentary ones. However, despite this separation, the executive and legislative branches are interdependent (Shugart, 2005: 334). The legislature typically controls the budget, giving it significant influence over the president's agenda. Conversely, the president often possesses veto power over legislation passed by the legislature, creating a system of checks and balances. This necessitates cooperation and negotiation between the two branches, as the president needs legislative support for funding and the legislature must consider the president's potential veto. Further examples of this interdependence include presidential appointments requiring legislative confirmation and treaty ratification often needing legislative consent. While the separation of powers is fundamental, it is the interaction and interdependence between the branches that allows the government to function effectively (Duverger, 1980: 171-172; Elgie, 1993; Sartori, 1997: 83).

The semi-presidential system aims to bring together some positive aspects of the parliamentary and the presidential system. However, this system also has some negative aspects. The lack of a clear separation of powers between the powers of the head of state, who has broad powers, and the powers of the ministers council and the prime minister may lead to a confusion of powers and may cause the executive branch to deadlock (Kaynar, 2017: 322). Moreover, the existence of head of state may lead to the personalisation of many political processes and prevent the application of the rules of law (Gökçe, 2019: 149).

GOVERNMENT SYSTEMS IN TÜRKİYE

The Historical Adventure of Government Systems in Türkiye

When analysing the history of the governmental system in Türkiye, it is important to evaluate it together with the Ottoman legacy. Almost all of the modernisation efforts undertaken by the Ottoman Empire to catch up with the world civilisations were based on constitutionalism. However, this was in the direction of restricting the powers of the sultans. However, this was not very successful. In general, some of the powers of the sultans were curtailed and the powers of the sultan became a written text. Although these attempts did not result in success, it is possible to say that they paved the way for the birth and development of ideas such as parliament, national sovereignty and representation, which are the basic concepts of political language as a legacy to the republic (Ay, 2006: 3-4).

The origins of parliamentary system debates in the Ottoman Empire date back to the 1830s. These debates increased in the 1860s and as a result, the Constitutional Monarchy was declared in 1876. Although the Parliament was dissolved by Abdülhamid II in 1878 and the constitution was suspended, this process indirectly continued until the re-enactment of the Law-u Esasi in 1908. It is possible to state that the experience of the parliamentary system in the Ottoman Empire continued until 1 November 1922, when the empire actually came to an end.

The 1921 Constitution, which came into effect prior to the proclamation of the Republic of Türkiye, served as a foundational framework for the new state. Article 3 of this constitution vested legislative and executive powers in the Grand National Assembly of Türkiye (TBMM), while Article 4 explicitly established a parliamentary system of government. Following the proclamation of the Republic on 29 October 1923, a new constitution was adopted in 1924. This constitution, which remained

in force for 36 years, underwent numerous amendments before being replaced by the 1961 Constitution. The 1921 and 1924 constitutions were characterized by a parliamentary system in which legislative and executive powers were concentrated in the hands of the TBMM. However, the 1961 Constitution marked a significant shift by abandoning this centralized model and adopting a parliamentary regime based on the principle of separation of powers. Under the 1961 Constitution, legislative authority was assigned to the Parliament (Article 5), while executive authority and responsibility were entrusted to the President and the Council of Ministers (Article 6). This change aimed to create a more balanced distribution of power between the branches of government. The 1982 Constitution, like its predecessor, maintained the parliamentary system. However, it introduced important modifications in response to perceived weaknesses in the executive branch relative to the legislature. During its drafting, the powers of the Parliament and the government were curtailed, while the authority of the President was significantly expanded. These changes were intended to strengthen the executive branch and ensure a more effective balance of power within the political system. Despite these adjustments, the parliamentary framework remained the cornerstone of Türkiye's constitutional structure (Kuzu, 1982:45).

From the late 1980s until 16 April 2017, there were intense debates on presidential and semi-presidential systems in Türkiye. These debates addressed both in the academic and political arena that the parliamentary system was blocking the country and that the country was facing crises. One of the debates points to the fact that a total of 8 different coalition governments were formed between 1991 and 1999. Some sources have argued that the semi-presidential system was implemented in practice, if not theoretically, in Türkiye with the 1982 Constitution. However, in Türkiye the president was elected by the Parliament until 21 October 2007 (the 11th President was elected by the Parliament on 28 August 2007 and his term ended on 28 August 2014). With the Presidential Election Law No. 6271 published in the Official Gazette dated 26 January 2012, when the amendments introduced by the referendum entered into force, the presidential election on 10 August 2014 was held by popular vote (Güvenç & Turan, 2024:90).

Election of Bodies (2014-2018 Period)

Following the adoption of the referendum, significant changes were introduced to the presidential election process. Starting with the 2014 elections, the President began to be directly elected by the people, marking a pivotal shift in the country's political system. Additionally, the presidential term was reduced from seven years to five years, aligning it more closely with the terms of other elected officials. The presidential election process operates in two rounds. In the first round, if no candidate secures more than 50% of the votes, the two candidates with the highest number of votes advance to a second round. The candidate who receives the majority of votes in the second round is elected as President. This two-round system ensures that the elected President enjoys broad popular support, thereby enhancing their political legitimacy. To become a presidential candidate, individuals must meet specific requirements. They can either be nominated by political parties that have a group in the TBMM or gather the signatures of at least 100,000 eligible voters. This dual pathway for candidacy ensures that both established political parties and independent candidates with significant public backing can participate in the election process. By transitioning to a direct popular vote and implementing a two-round system, the new presidential election process strengthens the democratic legitimacy of the President, as it requires candidates to secure widespread support from the electorate. This change reflects a broader

trend toward enhancing democratic accountability and responsiveness in Türkiye's political system (Yılmaz, 2018:16).

According to the 1982 Constitution, as amended, the President of the Republic of Türkiye is the head of the executive branch. Elections for President are held within sixty days before the expiration of the current term, or within sixty days of a vacancy. The President is elected by universal suffrage, with the candidate receiving a majority of votes declared the winner. The outgoing President remains in office until their successor assumes the role. Following a 2007 constitutional amendment, the President is directly elected by the people. Recep Tayyip Erdoğan's election in 2014 was the first presidential election held under this new system, making him the 12th President of Türkiye and succeeding Abdullah Gül (Yılmaz 2018:51).

Parliamentary elections are held every five years. In Türkiye, the parliament is represented by a unicameral body called the Grand National Assembly of Türkiye (TBMM), which has 550 members. Members of the TGNA are elected through general elections and the electoral system is based on the d'Hondt proportional representation principle. There is a national threshold of 10 per cent, which requires parties participating in the elections to exceed a high threshold. As the members of parliament are directly elected by the people, the legislature reflects the will of the people. MPs fulfil tasks such as legislating, proposing bills and scrutinising the government. Parliamentary elections are an important mechanism to ensure democratic representation and the election process is conducted within the framework of the procedures set by the constitution (Kahraman, 2012:270).

The Prime Minister and the Council of Ministers are formed after the parliamentary elections by appointing the leader of the political party with the largest number of seats as Prime Minister. The Prime Minister appoints the Council of Ministers and submits it to the President for approval. In order for the Council of Ministers to take office, it must receive a vote of confidence from the Parliament. Ministers exercise executive power in their respective areas of responsibility but are generally responsible to the Prime Minister. This system ensures the functioning of checks and balances between the legislature and the executive (L'Europe, 2004:26).

In Türkiye, the appointment of members of the judiciary is carried out by designated institutions, with the aim of ensuring impartiality and independence in the judicial system. However, the process has sparked debates regarding the balance of power and the influence of the executive branch. The Constitutional Court, which serves as the highest judicial authority for constitutional matters, consists of 15 members. Of these, 12 are directly appointed by the President of the Republic, while the remaining 3 are elected by the Turkish Grand National Assembly (TBMM). Critics argue that the extensive influence of the executive in judicial appointments could undermine the separation of powers and the autonomy of the judiciary. This has led to ongoing debates about the need for reforms to strengthen judicial independence and ensure a more balanced distribution of power in the appointment process. Ultimately, while the current system aims to maintain an impartial judiciary, the dominant role of the executive branch in appointments continues to raise questions about the potential impact on judicial independence and the rule of law (Çelik, 2018:1064).

Distribution of Powers and Duties between the President and the Prime Minister (2014-2018 Period)

In the 1982 Constitution, the powers and duties of the legislative power can be categorised under two headings. The first one is related to the supervision of the

government and the second one is directly related to the legislative power. The 1982 Constitution, just like the 1961 Constitution, has clearly stated the main duties and responsibilities of the Parliament in one article (Article 87). It also regulated some of these duties in detail in separate articles (Gözübüyük, 2013: 222, Demir, 2000: 66).

In Article 87 of the 1982 Constitution, the powers and duties of the TBMM, which is the legislative power, are stated as follows: 'To make, amend and repeal laws, to supervise the Council of Ministers and ministers, to authorise the Council of Ministers to issue decrees with the force of law on certain issues, to discuss and adopt the budget and final accounts bills, to decide on the declaration of war and the printing of money, to adopt international treaties, to decide on the declaration of general and special amnesty, to use the powers stipulated in other articles of the Constitution' as stated above. The principle of supremacy of the legislature, which was present in the 1961 Constitution, was preserved in the 1982 Constitution (Gözübüyük, 2013: 237-245).

Executive power belongs to the President and the Council of Ministers. Compared to the 1961 Constitution, the executive has been strengthened a little more in the 1982 Constitution. It is possible to say that this is one of the typical characteristics of parliamentary systems. The dismissal of ministers is done in the same way. The Prime Minister, as the leader/chairman of the Council of Ministers, oversees the general policy of the governmental power and establishes the basic functioning and co-operation among ministers. The Prime Minister is obliged to establish regulatory and preventive mechanisms to ensure and supervise that ministers act in accordance with laws, codes and relevant binding provisions with regard to their actions and duties in their respective fields of interest. The Prime Minister is the hierarchical superior of the Council of Ministers rather than the first among equals. In this parliamentary system as practised in Türkiye, ministers are both individually politically responsible for their individual tasks and the Council of Ministers is collectively responsible to the Parliament for the main policies of the government. In addition, the government can be overthrown by the Turkish Grand National Assembly through the policies pursued by the Council of Ministers (government) through censure, parliamentary investigation, vote of confidence and rejection of the budget (Hekimoğlu, 2009: 191-192).

The President promulgates laws, can send legislation back to Parliament for reconsideration, and files annulment cases with the Constitutional Court. They appoint the Prime Minister (where applicable) and ministers, convene the Council of Ministers, sign international treaties, and decide on the use of the armed forces. While the President enjoys political irresponsibility, meaning they are not accountable for actions taken in office, they can face criminal liability only in cases of treason. Despite these broad powers, the President's role is balanced by the parliamentary system's principles of separation of powers and legislative oversight, though debates persist about the influence of the executive on judicial independence and the overall balance of power (Gözübüyük, 2013: 236-245).

Mechanisms of Influence of Bodies on Each Other (2014-2018 Period)

The Grand National Assembly of Türkiye (TBMM), which is the legislative body, has significant control over the executive body. The fact that the government is accountable to the TBMM has enabled the legislature to control the executive. The TBMM has been able to directly influence the government through the vote of confidence and interpellation mechanisms. While the vote of confidence requires the approval of the Parliament in order for the government to assume office, interpellation has become a mechanism that enables the removal of the

government or a minister from office. Such powers have increased the influence of the legislature over the executive, making democratic control possible.

The legislature's control over the executive has not been limited to votes of confidence and interpellation, but has also been maintained through parliamentary investigations, general discussions and written and oral question mechanisms. The written and oral questions posed to the government by members of parliament have enabled the transparent evaluation of the government's actions through public discussion. Parliamentary research has become an important control tool for obtaining information on a specific issue and informing the public (Bektaş, 2019:205).

The influence of the executive branch on the legislature became evident in the process of preparing and submitting bills to the Parliament. The laws sent back by the President were reconsidered in the Grand National Assembly of Türkiye and a way was found for their acceptance. Another influence of the President on the Grand National Assembly of Türkiye was related to the termination of the legislative period. According to the Constitution, the President could dissolve the Parliament and decide on early elections when necessary. While this authority allows the executive body to make quick decisions in times of crisis, it could also be considered as an element of pressure on the legislative body (Güvenç & Turan, 2024:92).

The interaction between the legislative body and the judiciary has occurred within the framework of the judiciary's supervision of legislative activities. The Constitutional Court is the most important body that monitors the constitutionality of laws adopted by the TBMM. In the 2014-2018 period, the Constitutional Court undertook the task of protecting the fundamental rights and freedoms of citizens through the individual application mechanism. During this process, it was ensured that the laws enacted by the TBMM remained within the constitutional framework (Yaman, 2016:88).

Another influence of the judiciary on the legislature has been realized through the supervision of elections. The Supreme Election Council (YSK) is a body that ensures that elections are held honestly and fairly. The legitimacy of the TBMM elections has been secured through the election processes carried out under the supervision of the YSK.

The relationship between the executive body and the judiciary is fundamentally rooted in the judiciary's role in overseeing the legality of the executive's decisions. The Council of State, as the highest administrative judicial body, plays a critical role in monitoring the legality of the executive's regulatory actions. This judicial review ensures that the executive operates within the bounds of the law, upholding the principle of the rule of law. During this period, it was widely recognized as essential that the executive's decisions be subject to judicial scrutiny, as this serves as a safeguard against potential overreach or abuse of power. By allowing the judiciary to review and, if necessary, annul unlawful executive actions, this system reinforces accountability, transparency, and the protection of individual rights, all of which are cornerstones of a democratic and law-based state (Kömürçüler, Emin; Özçağ, 2015:90). The President of the Republic has exerted indirect influence on the judiciary through the appointment of certain members of the Constitutional Court and other high judicial bodies. However, the appointment of some members of the Supreme Council of Judges and Prosecutors (HSYK) by the executive branch has sparked significant debates about the independence of the judiciary. While these appointments have strengthened the executive's influence over the judiciary, they have also raised concerns about the potential

erosion of judicial autonomy. Critics argue that such practices could undermine the principle of the separation of powers and the judiciary's ability to function as an impartial check on the executive. This tension highlights the ongoing challenge of balancing executive authority with the need to preserve an independent and impartial judiciary, which is essential for upholding the rule of law and protecting democratic principles (İnceoğlu, 2011:242).

Appointment of Senior Executives (2014-2018 Period)

Ministerial appointments are directly related to the prime minister's determination and management of the government program. As the head of the government, the prime minister held the authority to select ministers. In the appointment of ministers, the prime minister's proposal resulted in the approval of the president, and these appointments were of great importance in terms of political control and effectiveness. Ministers were appointed as senior executives who were at the head of various public institutions in Türkiye and implemented the government's policies, to ensure the executive body. In the appointments, the ministers' political identities and experience in the fields in which they would serve were taken into consideration (Lamba et al., 2014:163).

To be eligible for the esteemed position of a Constitutional Court member in Turkey, candidates must be at least forty-five years of age and possess substantial professional experience. Academics must hold professorships or associate professorships, lawyers require a minimum of twenty years of practice, senior executives must have twenty years of public service alongside higher education, and judges/prosecutors need two decades of service including their candidacy period. Adding to this framework, four members are chosen from within the Constitutional Court itself by a secret ballot from the majority. Internally, the court is led by a Chairman and two Deputy Chairmen, elected annually and eligible for re-election. Crucially, members of the Constitutional Court are dedicated solely to their judicial duties, prohibited from holding any other official or private positions, ensuring their undivided focus on their constitutional responsibilities (Constitution, 2017:47-48).

According to the Constitution of the Republic of Turkey, it explains the appointment procedures of some senior public officials in Turkey. The process for appointing the Chief of the General Staff in Turkey is constitutionally and legally defined, significantly shaped by the 2017 constitutional amendments. These amendments centralized the appointment power solely with the President. The Chief, selected from the Commanders of the Army, Navy, and Air Force, serves a four-year term, potentially extendable by the President. The official appointment is formalized through publication in the Official Gazette. Prior to 2017, the Prime Minister and Minister of National Defense were involved, but the amendments streamlined the process, consolidating authority under the President. As the Turkish Armed Forces' highest-ranking officer, the Chief leads military operations planning and execution, while also collaborating with the Ministry of National Defense on national defense strategy (Anayasa Mahkemesi, 1982:38).

The Council of State is the highest authority for reviewing administrative court decisions, except when the law assigns this role to another body. It adjudicates cases, provides opinions on concession agreements and public service contracts within two months, resolves administrative disputes, and performs other legal duties. Key officials, such as the President, Attorney General, and department heads, are elected by the General Assembly for four-year terms and can be re-elected. The Council's structure, functions, and election procedures are regulated

by law, ensuring the independence of the judiciary and the security of judgeship (Anayasa, 2017:52-53).

In Türkiye, ambassadors are appointed with the proposal of the Minister of Foreign Affairs and the decision of the Council of Ministers, and are finalized with the approval of the President. Consuls are appointed directly by the Ministry of Foreign Affairs (Bakanlığı, 2019:53).

In Türkiye, the six candidates who receive the most votes among the faculty members who are elected within the university are presented to the Council of Higher Education, which notifies three of these six candidates to the President, who then selects one of the three candidates as Rector in accordance with Article 130 of the Constitution. The term of office of a Rector is four years, and a person can be Rector for a maximum of two terms (Sur, 2013: 155).

The members of the Military Court of Cassation are elected among first class military judges. The General Assembly of the Military Court of Cassation determines three candidates for each vacant seat by secret ballot and by the absolute majority of the total number of members. The President of the Republic shall elect one of the three candidates as a member of the Court of Military Appeals.

The Military Court of Cassation operates with a hierarchical structure, where the President, Chief Public Prosecutor, Second President, and department heads are all appointed from within its existing members. These appointments are strictly governed by rank and seniority, ensuring that leadership positions are filled by those with the most experience and established standing within the court. The selection and appointment process for members of the Military High Administrative Court (AYİM) is also a critical element of the broader military judicial system, highlighting the AYİM's importance and distinct procedures (Anayasa, 2017:52-53).

The selection and appointment procedure of the members of the Military High Administrative Court (AYİM) constitutes an important part of the military judicial system. The members of the High Military Administrative Court who are military judges are elected from among the first class military judges. Three candidates shall be nominated for each vacant seat by secret ballot and by an absolute majority of the total number of the presidents and members of the Court from this class. One member shall be elected by the President of the Republic from among these three candidates.

The non-judge members shall be elected from among the officers whose ranks and qualifications are specified in the law. The General Staff nominates three candidates for each vacant seat. The President of the Republic shall elect one of the nominees. The term of office of these members shall be a maximum of four years.

The members of the Military High Administrative Court shall be elected from among military judges and officers. While members of the military judge class are elected from within the court, non-judge members are nominated by the General Staff and appointed by the President of the Republic. The term of office of non-judge members is limited to four years (Anayasa, 2017:53).

FRANCE AND THE SEMI-PRESIDENTIAL SYSTEM

The Historical Adventure of the Semi-Presidential System in France

Until the Fifth Republic, French politics struggled to choose between the “search for order” and the “search for democracy and equality”, and after the increasing

economic power and a series of coups experienced by the bourgeoisie, a strong government order was urgently needed. The political crisis experienced especially after the Algerian war reached an unresolved state, and this situation especially ignited the class struggle in the country. Then, De Gaulle, who came to power again, reorganized the constitution and established the semi-presidential system with French political characteristics, and built the balance between the executive and the legislature with the so-called dual parliamentarism. Although the model French political genetics is a constitutional order in fact, it can be said that it put the country into a new parliamentary order in 1958 (Liu, 2024:2). In this context, it is possible to examine the ongoing regime trials in the country before the new constitutional order in the table below.

Table 1. Chronology of French Regimes from 1789 onwards

1.	1789–1792: Constitutional Monarchy
	<ul style="list-style-type: none"> ○ The French Revolution led to the establishment of a constitutional monarchy. ○ King Louis XVI's powers were limited by the National Assembly, which held legislative authority.
2.	1792–1804: First Republic
	<ul style="list-style-type: none"> ○ The monarchy was abolished, and France became a republic. ○ Political power shifted between the Committee of Public Safety (during the Reign of Terror), the Directorate, and the Council. ○ The period was marked by internal turmoil and external wars.
3.	1804–1814: First Empire
	<ul style="list-style-type: none"> ○ Napoleon Bonaparte declared himself Emperor Napoleon I. ○ His rule was legitimized by plebiscites, though these were often rigged. ○ The empire expanded across Europe before collapsing in 1814.
4.	1814–1830: Restoration Monarchy
	<ul style="list-style-type: none"> ○ The Bourbon monarchy was restored under Louis XVIII and Charles X. ○ A parliament with limited powers was established, but the monarchy retained significant authority.
5.	1830–1848: Orleanist Monarchy
	<ul style="list-style-type: none"> ○ A constitutional monarchy was established under Louis-Philippe. ○ Ministers were responsible to a parliament elected by limited suffrage.
6.	1848–1852: Second Republic
	<ul style="list-style-type: none"> ○ The monarchy was overthrown, and a republic was established. ○ Both the National Assembly and the President were elected by universal male suffrage.
7.	1852–1870: Second Empire
	<ul style="list-style-type: none"> ○ Napoleon III (Napoleon's nephew) declared himself Emperor. ○ His rule was initially authoritarian but gradually introduced parliamentary concessions.
8.	1870–1940: Third Republic
	<ul style="list-style-type: none"> ○ A parliamentary republic was established. ○ The Chamber of Deputies was directly elected by universal male suffrage, while the Senate was indirectly elected. ○ The President and Prime Minister had limited powers, with the legislature holding significant authority.
9.	1940–1944: Vichy Regime
	<ul style="list-style-type: none"> ○ After France's defeat in World War II, Marshal Philippe Pétain established an authoritarian regime in Vichy. ○ The regime collaborated with Nazi Germany and had limited sovereignty due to German occupation.
10.	1944–1946: Postwar Provisional Government
	<ul style="list-style-type: none"> ○ A provisional government was established after the liberation of France. ○ Unicameral Constituent Assemblies were elected by universal adult suffrage, including women for the first time.

11. 1946–1958: Fourth Republic

- A parliamentary system similar to the Third Republic was established.
- The Senate was weaker, and women's suffrage was fully implemented.
- The period was marked by political instability and colonial conflicts.

12. 1958–Present: Fifth Republic

- Established under Charles de Gaulle, the Fifth Republic introduced a semi-presidential system.
 - The President holds significant executive powers, while the Prime Minister and Government are responsible to the National Assembly.
 - The National Assembly is directly elected, and the Senate is indirectly elected
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Knapp, E. (2006). *The Government and Politics of France*.

According to Table 1: After the revolution of 1789, the king's powers were limited and were replaced by supervisory and regulatory committee and council powers until the First Empire period, however, the dubious votes tried during the reign of Napoleon I created the need for a parliament, albeit with limited powers, for sixteen years. The constitutional monarchy period, in which voting rights were limited, gave way to the President and the National Assembly, who were directly elected by universal suffrage, with the Second Republic. However, the Senate of the Third Republic period, which was directly elected by universal male suffrage, established the unicameral Constituent Assembly with a new election including women voters after the German occupation, and by 1958, the President, Prime Minister and the Government, the National Assembly and the Senate elements, with full participation and more power compared to the Fourth Republic period, took their place in French democracy.

Election of Bodies

The highest executive body in France is the President. The election of the President is one of the most important steps in the political structure of France and is carried out by direct popular vote. The President of France is elected for a five-year term. The system applied in the election of the President is a two-round majority system. In the first round, all candidates for the Presidency compete. If a candidate receives 50 percent of the total votes in the first round, he/she wins the election. However, if no candidate exceeds 50 percent, the next stage is advanced to. This is a system in which the will of the people is directly effective at the basis of the highest election in France. In order to become a presidential candidate, it is necessary to be a French citizen, to be at least 18 years old, and to collect a sufficient number of signatures from a political party or independently. This number of signatures must usually be supported by the signatures of 500 public officials. The candidate aims to gain the support of the voters by presenting his/her own program and political vision. The French President not only has executive power, but also plays a major role in the country's foreign policy. He also oversees the implementation of laws, appoints the prime minister, and exercises some constitutional powers. In the election of the president, the people's right to direct vote and a mechanism that reflects the voters' views come into play (Ackerman, 2000:32). In France, the legislative body has a parliamentary structure consisting of two wings. The National Assembly (Assemblée Nationale) and the Senate (Sénat) are these two wings. The election processes of these bodies also differ and aim to ensure different popular representation. The most powerful of the legislative bodies in France is the National Assembly. The National Assembly consists of deputies directly elected by the people. These elections are held every five years and are usually based on a two-round electoral system. This system is the basic feature of elections in France and grants representation to many voters. In the first round, votes are cast for the

election of one deputy from each electoral district. Deputies in the National Assembly are not only elected directly by popular vote, but candidates can also apply as party lists or independently. While party lists are usually determined by the major political parties, independent candidates also aim to enter the assembly by seeking support from the public. The Senate is the second chamber of France's legislative bodies and is based on a different electoral system. The Senate is composed of members elected not by the public, but by local councils, mayors and various local governments. Elections to the Senate are held every five years, and members of the Senate are elected by the local administrators of each region. This election is an election process formed by local representatives rather than direct participation by the public. The Senate's electoral system mostly works in an indirect way. This system allows local councils and administrators to have a say instead of the public. The purpose of the Senate is to add a supervisory function to the legislative process of the national assembly. At the same time, the Senate plays a supervisory role, acting as a check on the President (Jančić, 2013:27)

Senators are elected only by local election officials and members of the Assembly of French Citizens Residing Abroad. Senators can form temporary special information and advisory boards on certain issues. Unlike the National Assembly, the Senate, which cannot be dissolved, is an institution different from the National Assembly in that its president can serve as the Interim President as mentioned above (Senat, 2023:6) The Council was established by the Constitution of the Fifth Republic. Technically, it is not a constitutionally higher court than the Conseil d'État or the Cour de Cassation. It organizes hearings and sessions according to the applications received. The Council, which always makes decisions and holds sessions in full session, is a body where decisions are made by seven members with a majority. In the event of a tie, the president's vote is decisive, but unlike public trials, voting and deliberation information is not made public. The authority to investigate is given to a member appointed by the president. This member is called a rapporteur. While the parties are granted the right to representation in hearings, the proceedings are conducted in writing. Public hearings can also be held, especially in cases involving election disputes. The Constitutional Council, which has judicial authority, has 9 members and ensures that laws comply with constitutional rights and freedoms. It is the institution that checks whether the President's extraordinary powers, including presidential elections, Senate elections and referendums, are exercised within a one-month period. With the constitutional amendment made on July 23, 2008, plaintiffs have the right to individually apply to the Constitutional Council regarding the constitutionality of cases (Conseil Constitutionnel, 2025). The election processes of bodies in France are not limited to the President and the Parliament. In France, local governments, European Parliament elections and some special bodies are also elected by the people. In France, mayors, local council members and regional bodies are also elected by the people. These local governments play a critical role, especially in the organization of local services and make important decisions to meet the needs of the local people. France, as a member state of the European Union, is also represented in the European Parliament elections. These elections are carried out through political parties and independent candidates in France. Elections for the European Parliament are held every five years and French citizens have a say in these elections (Senat, 2023:6).

Distribution of Powers and Duties between the Legislative and Executive

Elected for a five-year term, the French President is not simply a figurehead. Beyond the conventional executive roles, the French President wields significant influence, notably demonstrated by their power to name the Prime Minister and

guide defense and foreign policy. However, the President's reach is not limited to these traditional "hard power" areas. Importantly, their impact extends into the realm of "soft power," encompassing cultural, economic, and scientific foreign policy initiatives. This dual nature of presidential authority, spanning both traditional and less conventional domains, enables the President to be a key agenda-setter on national and international fronts. The system itself, therefore, reflects a deliberate equilibrium: it grants substantial leadership to the executive branch, embodied by the President, while simultaneously embedding it within a framework of parliamentary governance, ensuring a balance of power (Schmidt, 1999:23).

In France's semi-presidential framework, executive power is deliberately divided between the President and the Prime Minister, each holding specific and significant responsibilities. As head of state, the President commands the international stage and national defense. This is evident in their role as commander-in-chief of the armed forces, their representation of France in global affairs, and their authority in shaping interstate agreements. Furthermore, the President exerts influence over key appointments, selecting the Prime Minister, proposing government officials, and, upon the Prime Minister's recommendation, appointing leaders to state-owned enterprises. In a display of political leverage, the President also possesses the power to dissolve the National Assembly and initiate new legislation. Crucially, the President actively chairs the Council of Ministers, a central forum for major political decisions, thereby directly participating in policy creation, even as the Prime Minister is charged with its execution. Conversely, the Prime Minister, as head of government, is the central figure in domestic governance and the daily operations of the state. Their domain encompasses managing government policy, initiating legislation within the National Assembly, and enacting decrees and regulations. The Prime Minister is responsible for coordinating the efforts of government ministers, ensuring the practical implementation of government policies, and overseeing public services. It is critical to note that the Prime Minister's position is contingent upon maintaining the National Assembly's confidence; a lost vote of confidence necessitates resignation and the President's appointment of a successor. This carefully structured dual executive system fosters a division of labor: the President concentrates on broader strategic and international matters, while the Prime Minister manages the intricacies of domestic administration and legislative processes. Together, their distinct roles are designed to achieve a balance of power, promoting both governmental stability and democratic accountability within the French political landscape (Awasthi, 2024:5). According to Article 20 of the Constitution, the Prime Minister is responsible to the government. His duty to manage the government's work and operations and to operate in accordance with the legislation is specified in Article 21. In France, the government consists of the Prime Minister, ministers, full ministers, delegated ministers, state ministers and high commissioners. The powers and responsibilities of each minister are not fixed. The current political balance and implementation priorities therefore determine the duties and responsibilities of the ministers.

Mechanisms by Which Bodies Influence Each Other

There is a parliament in France consisting of 577 deputies and 322 senators. Deputies are elected by the people for 5 years, while Senate members are elected by regional and local assemblies for 6 years (on condition that half of them change every three years). It should be noted that the Senate has limited legislative authority. If a disagreement arises between the Senate and the Assembly, the competent assembly has the final say. In France, the government plays an

important role in determining the basic agenda of the assembly (Gül, Kamalak and Gül, 2017:111-112; Çeliksoy and Güler, 2020: 2245-2246).

In France, parliamentary meetings are limited to 9 months by the constitution. It has been stated that these meetings should not exceed 120 sessions. However, a door has been opened in this regard and it has been foreseen that these meeting periods can be extended upon the request of the prime minister. As stated above, the government determines the main agenda of the parliament and has the authority to bring forward any draft law it wants for discussion. However, the parliaments are authorized to determine their own agendas every month. The government can also obtain the authority to make laws with the force of law from the parliament. However, the basic situation here is that the parliament cannot use the authority it has given on a subject itself, and loses its competence and authority to make laws on that subject. Along with all these issues, the parliament can express its objections to the law-making authority given to the government during the legislative process in order to prevent the government from going beyond the drawn boundaries and misusing the given authority. Despite all these issues, if the parliament attempts to enact a law despite giving the government the authority to make laws on a subject, the government can apply to the Constitutional Council and gain the authority to make laws directly on that subject. In France, the government is responsible to the National Assembly. However, this situation has also been limited so that it is not abused. Members of parliament who sign a rejected vote of confidence cannot sign another motion for a vote of confidence within one year. The Prime Minister can also request a vote of confidence on any bill. (This issue has been included with the amendment made in 2000.) (Eyüboğlu, 2014: 161-165). When members of parliament are appointed as ministers, their mandate is terminated/it is assumed that they have left office. The basic situation stated here is that ministry and membership of parliament are incompatible. The meaning and importance of the distribution of authority in the context of the legislative power is the erosion of its authority/power and weight against the president within the political system. In this context, the legislative power and authority to monitor the government has been restricted. Although the cabinet is responsible to the legislative power in France, the president has been given executive power in the context of the executive power. The concepts of cabinet and government are different in France. The Council of Ministers or the Government is formed by the ministers under the leadership of the President and meets once a week. In short, this is called the Presidential Government. If the president does not attend and the ministers meet under the leadership of the prime minister, this is called the cabinet. In cabinet meetings, the president gives the prime minister a written power of attorney in advance, and the agenda is determined in advance. In general, issues related to the routine functioning of the administration, internal security and the economy are discussed in cabinet meetings). Despite this power, the president has no responsibility other than treason. Just as in the parliamentary system, the president's irresponsibility continues. Although the parliament has the authority to overthrow and supervise the government, it does not have the authority to oversee the President openly. The basic meaning of this is that the accountability and responsibility of the President are limited to elections (Eyüboğlu, 2014: 75; Kaboğlu, 2019: 151-152).

In this dualist political system, the president holds a position of significant power that overshadows the prime minister, contrasting sharply with parliamentary systems. While the prime minister leads the government and the formal law-making process, the president effectively controls the government's agenda and can prevent laws by rejecting the prime minister's proposals. Beyond this, the

president can issue decrees with the force of law and even dismiss the prime minister, solidifying their dominant role, particularly in international politics and as a mediator within the government. This structure establishes a hierarchical relationship where the president, despite lacking a formal veto on laws, wields considerable influence over the legislative and governmental direction, making the prime minister a subordinate figure (Ataöv, 2011: 185).

Appointment of Senior Executives

In France, the appointment of senior executives is a shared process between the President and the Prime Minister, but the most influential decision-maker is the President. The executive branch in France is shaped by the President, who is the highest authority. The President's powers are not limited to appointing the Prime Minister alone, but also play a decisive role in the appointment of many senior executives and the organization of the most important organs of the state. The Prime Minister's appointments are generally subject to the President's approval, but the Prime Minister's recommendations are quite effective in some appointments. The President's appointment powers are quite broad within the framework of France's semi-presidential system. The President, who holds the highest executive authority, appoints the Prime Minister, as well as members of the Council of Ministers such as ministers and state secretaries. These appointments are generally made in line with the President's political line.

According to Article 56 of the French Constitution; In France, 9 members are elected to the Conseil Constitutionnel (Constitutional Council) for a 9-year term. 1/3 of its members are renewed every three years. The President appoints the President of the Council. The assemblies do not have a direct veto power regarding these appointments. However, they can express their opinions. When the President's term of office ends, nine members are directly elected as natural members to the Constitutional Council. In France, the Force Commanders (Air, Sea and Land) and the Chief of General Staff are appointed directly by the President without the approval of the assemblies. The persons to be appointed as an additional here can be discussed in the Council of Ministers, but as stated, the President holds the appointment authority (Gönenç, 2002:221).

In France, the Council of State consists of more than 300 members. The president and members are directly elected by the president without requiring parliamentary approval. The president appoints the members from among lawyers who have gained many years of experience in administrative justice. (Generally, some of the members are graduates of the French School of Administrative Justice and people who have proven their legal maturity in the field of law.) The term of office of the appointed members is lifelong. The Court of Cassation in France consists of approximately 250 members. The president appoints its members and president directly without any parliamentary control and approval. The members of the Court of Cassation are selected by taking into account the experience of the members and the opinion of the High Council of Judges and Prosecutors (U. Gönenç, 2024:126).

The administrative structure of the French Court of Accounts consists of a president, seven chamber heads and inspectors. The first president, appointed by the president, is the head of the institution and continues his duty until he is 68 years old. The chamber heads appointed by the first president remain in office until he is 65 years old. Approximately 250 personnel are also responsible for carrying out support services. The majority of its members are from the ENA (Ecole Nationale d'Administration) and have received higher education in public law, economics and finance (Yilmaz, 2018:74).

The French High Council of Judges and Prosecutors (CSM), established by Article 65 of the Constitution, is crucial for judicial independence in France. Chaired by the President and vice-chaired by the Minister of Justice, it has two chambers (judges and prosecutors) with diverse membership including judges, prosecutors, a Council of State member, and non-political figures. The CSM recommends/appoints judges to high courts, provides opinions on prosecutor appointments (except those by the Council of Ministers), and acts as a disciplinary board. By balancing executive involvement with independent oversight, it safeguards judicial independence, upholds the rule of law, and maintains public trust in the French legal system (Langer, 2017:109).

The Legion of Honour, the highest French decoration, is the highest award given by the French Republic for distinguished service to France, regardless of the recipients' social status or nationality. The President is the Grand Master of the Legion of Honour. The President decides who receives the Legion of Honour. Governors are appointed with the approval of the President upon the recommendation of the Minister of the Interior. The Prime Minister assumes the operational management of the government and is influential in the appointment of certain senior executives. After the Prime Minister forms the Council of Ministers, he submits them to the President for approval. The Prime Minister also plays an important role in the appointment of lower-level executives, such as Secretaries of State. The approval of the President is the most important element in the appointment process of the Prime Minister. Appointments proposed by the Prime Minister are approved in accordance with the policies of the President. Control mechanisms have been established in the appointment of senior executives in France to ensure the balance between the powers of the state. The most powerful control mechanisms are carried out by the judiciary and the legislative bodies. The Parliament supervises the appointments of the President and the Prime Minister and, when necessary, discusses whether some appointments are appropriate (Suleiman, 2016:365).

In France, ambassadors are appointed upon the proposal of the Minister of Foreign Affairs and the approval of the President. Consuls are appointed directly by the Ministry of Foreign Affairs.

The President may, upon the proposal of the Government and the two Houses published together in the Official Gazette, decide to seek the opinion of the voters of a local authority on the form of organization, powers or legislative regime of that local authority. When this request concerns a change foreseen in the previous paragraph and is organized upon the proposal of the Government, it shall be made in the form of a declaration following the discussion before both Houses.

France is divided into 23 educational regions called Académie. The Recteur de l'Académie, appointed by the Minister of Education, coordinates all educational activities in his/her region from primary to higher education. The Recteur, representing the Minister, is the inspector of all higher education institutions in his region. He participates in all boards, or sends his representative. The Recteur is informed of the decisions taken by the University Rector and the University Boards and examines whether they comply with the relevant legislation in force. If it is determined that these do not comply with the current legislation, the Recteur applies to the court with a request for annulment or, if he believes that irreparable damages will occur, he can directly stop these transactions within a period of 3 months (Publications, 2021:219).

COMPARISON BETWEEN TÜRKİYE AND FRANCE

Election of Bodies

In the Semi-Presidential System implemented in France, the executive power consists of the strong president and the prime minister, who is responsible to the National Assembly, and the cabinet. In Türkiye, between 2014 and 2018, the executive power has a dualistic structure. It is just like the system implemented in France. The president and the government exercise executive power. However, it is the government that is responsible to the Turkish Grand National Assembly. In France, there are strong parliaments and local governments within the framework of the unitary structure. In Türkiye, local governments are subject to the tutelary control of the central government (Kariman, 2019:4).

The election of bodies in Türkiye and France is an important element that reveals the fundamental differences between the political systems of both countries. Türkiye had a parliamentary system between 2014 and 2018, but during this period, the election of the President was made by the people, while the Prime Minister and the Council of Ministers were appointed by the President. In France, in the system that existed between 2014 and 2018, the election of the president was again made by the people. However, the political structure of France is based on a semi-presidential system, and therefore, there are differences between the election of the president and the appointment of the prime minister. Although the president of France is elected by the people, he does not take office as the head of the government. Instead, the president must appoint the prime minister. The prime minister serves as the head of the government and the president does not have the authority to interfere with the internal functioning of the government. However, the election of the president by the people ensures that he is in a strong position (İşçi, 2021:14).

France and Türkiye both have democratic systems but differ significantly in their government structures and power distribution. France operates under a semi-presidential system, where power is shared between the President, who holds significant authority in areas like foreign policy, and the Prime Minister, who manages domestic policy and government operations. In contrast, Türkiye has a presidential system where the President serves as both head of state and government, wielding extensive executive authority, especially after the abolition of the Prime Minister role in 2017. Both countries allow for the removal of the President for violating duties, requiring a two-thirds majority vote in Parliament. While France's President and National Assembly serve five-year terms, Türkiye's President and legislature serve four-year terms, reflecting differences in political dynamics and stability (Kubicek, 2020:28).

Distribution of Powers and Duties between the President and the Prime Minister

The first president elected under this system was Charles de Gaulle. In Türkiye, the 1982 constitution initially provided for a different method of presidential selection. However, following a referendum held on October 21, 2007, the constitution was amended to allow for the direct election of the president by the people. This change marked a significant shift in Türkiye's political system, aligning it more closely with the French model in this regard. Both countries exemplify a blend of presidential and parliamentary systems, where the directly elected president holds significant authority, while the prime minister and Cabinet are responsible for day-to-day governance and require parliamentary support. Following this amendment, the president was elected by the people for the first

time on August 10, 2014. In France, the president can dissolve the parliament once a year, if he deems it necessary, after consulting both the speaker and the prime minister. In Türkiye, the president can decide to call early general elections. In France, the president cannot veto laws passed by the parliament, delay their promulgation or referendum, while in Türkiye, the president can veto laws passed by the parliament only once, send them back to the parliament again, and if the parliament re-adopts the same law “down to the dot” and sends it to the president, the president must approve that law. Unlike France, in Türkiye, the president can take the law that has been accepted to the Constitutional Court and file a lawsuit for annulment. In the semi-presidential system in France, the president can continue his relationship with his party and become the party leader, while in Türkiye, until the change made in 2017, the president was prohibited from being a party member. In Türkiye, the distribution of duties between the president and the prime minister was clearly separated between the years 2014-2018. While the president had the authority to appoint the prime minister and manage the government, the prime minister made important decisions together with the president in the executive branch. However, during this period, the president's expanded powers and the prime minister's limited duties could affect the functioning of the government. The president's greater say in the government led to the president having a strong leadership position. While the president's greater authority over the prime minister in Türkiye leads to a concentration of power in the system, in France, the prime minister's ability to act more independently makes the system more balanced (Elgie, 2011:126).

Mechanisms by Which Bodies Influence Each Other

Between 2014 and 2018, Türkiye operated under a dual executive system where power was shared between the President and Prime Minister. While the President formally appointed the Prime Minister and cabinet, parliamentary majority and the Prime Ministry itself provided some checks. However, particularly when from the same party, the President often exerted significant influence over the Prime Minister, setting the agenda and expecting alignment. This period, characterized by negotiated authority and inherent tensions, was ultimately transitional. It culminated in the 2017 constitutional referendum and the 2018 shift to a presidential system, abolishing the Prime Ministry and consolidating executive power under the President, marking a significant change from the prior era of shared authority and oversight (Kaan, 2019:8).

In both France and Türkiye, the two-term election of the president is determined by the constitution. In France, the president can dissolve the parliament once a year, if he deems it necessary, by consulting both the speaker and the prime minister. In Türkiye, the president can decide to call early general elections. In France, the president cannot veto laws passed by the parliament, can delay their promulgation or can take them to a referendum, while in Türkiye, the president can veto laws passed by the parliament only once, can send them back to the parliament again, and if the parliament accepts the same law “down to the dot” and sends it to the president, the president must approve that law. Here, unlike France, in Türkiye, the President can take the enacted law to the Constitutional Court and file a lawsuit for annulment. In the French Semi-Presidential System, the President can continue his/her relationship with his/her party and become the party leader, while in Türkiye, the President was prohibited from having party affiliation until the changes made in 2017. In France, the interaction between the Prime Minister and the President takes place at a more independent level. While the Prime Minister manages the daily functioning of the government, the President is more influential in areas such as foreign policy and defense. The interaction in

France is based on the independence of both bodies and involves a less hierarchical relationship. This situation allows the Prime Minister to exhibit effective management alongside the President's leadership in decision-making processes in France. In the interaction between bodies in France, the duties of both positions are clearly separated, and this determines the relations of control and cooperation (Kuru, 2009:109).

Appointment of Senior Executives

In France, the President appoints the Prime Minister, usually from the majority party in Parliament, but formal parliamentary approval is not required. The Prime Minister proposes ministers, who are appointed by the President. The government is accountable to Parliament, which can remove it through a no-confidence vote. In Türkiye, prior to 2018, the President appointed the Prime Minister from the majority party in Parliament, and the government required parliamentary confidence. However, after the 2017 constitutional changes, Türkiye shifted to a presidential system, eliminating the role of the Prime Minister. The President now directly appoints ministers and governs without requiring parliamentary confidence, though Parliament retains some oversight Powers (Güler, 1994:15).

In France the President of the Constitutional Court is appointed by the President of the Republic, and former presidents of France hold lifelong membership on the court after their terms end. Members serve non-renewable 9-year terms, with one-third of the court being renewed every three years to ensure continuity. In contrast, Türkiye's Constitutional Court comprises 17 members, with the President of the Republic appointing 14 and the Grand National Assembly (TBMM) electing 3. The President of the Constitutional Court in Türkiye is chosen by the members themselves, rather than by the head of state. Members serve 12-year terms, and there is no provision for lifelong membership after their terms expire. While in France the legislative bodies play a significant role in electing the majority of the court's members, in Türkiye, the presidency holds decisive influence over the composition of the Constitutional Court, reflecting a more centralized approach to judicial appointments. These differences highlight distinct approaches to judicial independence and the balance of power between branches of government in the two countries (Demir, 2021:32).

In France, as in the Council of State, all members of the Court of Cassation are directly elected by the president. In Türkiye, members of the Court of Cassation are elected by the president from among candidates determined by the election held within the board with the candidacy of people from the specified professional group.

In France, the High Council of Judges and Prosecutors consists of 12 members, while in Türkiye, the HSYK consists of 22 members. In France, the president presides over the board, while the minister of justice acts as his deputy. In Türkiye, the president of the board is the minister of justice. In France, members are elected by the legislative, executive and judicial authorities in a wide range. In Türkiye, the majority of members are elected by the president.

In France and Türkiye, general managers and undersecretaries are appointed with the approval of the government. However, in France, general managers are appointed by the prime minister and the president, and in Türkiye, with the approval of the relevant ministry and the prime minister. Undersecretaries are appointed by the prime minister and the president in France. In Türkiye, they are appointed with the approval of the prime minister and the council of ministers. In France, governors are appointed directly by the decision of the president, while in

Türkiye, governors are appointed with the recommendation of the Ministry of the Interior, the decision of the Council of Ministers and the approval of the president. There is no district governorship in France.

In France, the election of rectors is made directly by the university community, while in Türkiye, the selection of faculty members within the university, the involvement of the higher education institution and finally the president's selection of one of the three members is finalized. The term of office in France is five years, while in Türkiye it is four years. In both countries, rectors are limited to being elected a maximum of two times.

CONCLUSION

This study attempted to compare the semi-presidential systems of Türkiye and France between 2014-2018. The comparison generally covered the distribution of authority and power, and the bodies where power is concentrated. It was observed that the distribution of authority of the executive branch in the 2014-2018 political system of Türkiye and the semi-presidential system of France was structured differently. The transformation of the political system in Türkiye resulted in the election of the president by the people in a referendum held in 2007, and the evolution of the system to the “Presidential Government System” in 2018 as a result of the referendum held in 2017. However, this study mainly focused on the transition period between 2014-2018.

The President is in a strong position in France. He has authority over important issues such as defense, veto and foreign policy. The Prime Minister leads the government and is active in public order, economic policies and domestic policy. The National Assembly, on the other hand, has the authority to approve decisions and monitor the government. This situation can be said to indicate that the presidency in France emerged as the body where power is concentrated, but there is also a distribution of power in cooperation with the supervisory mechanism of the legislative power and the prime minister. In Türkiye, after the first president was elected by the people, the executive power had a dual structure as it did before the 2014 process. The president was on one side and the council of ministers on the other. With the election of the president by the people in Türkiye and his assumption of office, the president was not responsible to the parliament as he was before 2014. In this context, the situation of the president after the 2014 process is in line with the parliamentary system. After 2014, a person can be both a member of parliament and a prime minister or a minister. In this respect, the functioning of the parliamentary system is seen in Türkiye. Ministers can participate in the work of the Turkish Grand National Assembly, they have the authority to submit draft laws to the Assembly, ministers and the prime minister have the right to sit in the parliament, participate in discussions and speak. In terms of these features, it is not similar to the semi-presidential system implemented in France, but rather resembles a typical parliamentary system. When all the functioning explained in this paragraph is examined, the situation of the election of the president by the people, which was approved by the 2007 referendum and actively implemented after the 2014 presidential elections, and the functioning in Türkiye between 2014-2018 are similar to the Semi-Presidential system implemented in France only in terms of the fact that the president is elected by the people. When the veto power of the president in France is compared with the veto power of the president in Türkiye, it is seen that it is different from Türkiye. In France, the government submits the bills of both houses to a referendum after the bills of the members are published in the Official Gazette, and also submits the bills to a referendum if the bills submitted by the members of the assembly are

not discussed in the parliament within the legal period. The first can be done upon the proposal to be submitted by one fifth of the Members of Parliament with the support of one tenth of the voters registered on the electoral roll. In the second case, there is a condition of discussion within the specified period. If this process is not carried out, the president can directly submit it to a referendum.

If the French people do not vote on a subject that is put to referendum, the same issue will not be brought up again for two months. Thus, while the will of the people is followed, it is foreseen that a period of two years will be added and the conditions that may change can be discussed again. If it is accepted by the people, it is published by the president.

In France, there is no administration for re-arranging the law and submitting it to the president for approval. In Türkiye, if the issues or laws vetoed by the president are approved as is by a two-thirds vote, the president must publish it.

Therefore, while the parliament has a slightly greater weight in the balance of power in Türkiye, it is seen that the people are involved in the process in France. It is seen that in France, the referendum cannot be held without the support of one-fifth of the parliament members and one-tenth of the registered voters in the referendum of the government's bill and the laws made by the two houses of parliament. In Türkiye, there is no support from the people in initiating the referendum.

The appointment processes for members of the Constitutional Council in France and the Constitutional Court in Türkiye share some similarities, such as the use of quotas for appointments and the prohibition of re-election for members, but they differ significantly in terms of power distribution and checks and balances. Türkiye's system centralizes significant appointment authority in the presidency, allowing the President to unilaterally appoint members of the Constitutional Court, high-level judges, prosecutors, ambassadors, and other key officials, which has raised concerns about the monopolization of power and reduced institutional independence. Additionally, France involves the Council of Ministers in high-level appointments, fostering collective decision-making, while Türkiye's legislature plays a limited role, primarily in the election of some Court of Accounts members. These differences highlight France's emphasis on checks and balances and Türkiye's trend toward executive dominance, reflecting broader contrasts in their democratic structures.

REFERENCES

- Ackerman, B. (2000). The new separation of powers. *Harvard Law Review*, 114(3), 634. <https://doi.org/10.2307/1342286>
- Aksu, M. (2021, 04 26). İnsani Gelişmişlik Seviyesi İle Hibrit Rejimler Arasındaki İlişki. İnsani Gelişmişlik Seviyesi İle Hibrit Rejimler Arasındaki İlişki. Gaziantep: Gaziantep Üniversitesi, Sosyal Bilimler Enstitüsü Yüksek Lisans Tezi.
- Anayasa Mahkemesi. (1982). Türkiye Cumhuriyeti Anayasası.
- Anayasa, T. C. (2017). Türkiye Cumhuriyeti Anayasası.
- Ataöv, T. (2011). Federasyon Başkanlık Yarı-Başkanlık. İstanbul: Destek Yayınevi.
- Awasthi, A. (2024). Hybrid System of Governance in France : Semi Presidential System. 2(6), 77-89.

- Ay, Ş. (2004, Mayıs). Türkiye'de Parlamenter Sistem ve Hükümet Sistemi Tartışmaları. *Mevuzat Dergisi*(77).
- Bağce, H. (2016). Parlamenter Sistem Mi, Başkanlık Mı? Yoksulluktan Hukukun Üstünlüğüne Ülkelerin Dünyadaki Yeri. İstanbul: Gonca Yayınevi.
- Bakanlığı, A. ve S. H. (2019). Genel Olarak Devlet Teşkilatı.
- Bektaş, E. (2019). Cumhurbaşkanlığı Hükümet Sisteminde Yasama-Yürütme İlişkisi ve Bu Sistemin Türkiye Demokrasisine Etkileri. *Yasama Dergisi*, 39, 199–218.
- Conseil Constitutionnel. (2025). General Overview. <https://www.conseil-constitutionnel.fr/en/general-overview>.
- Çelik, D. B. (2018). 16 Nisan Anayasa Değişikliği ve yeni Hâkimler ve Savcılar Kurulu üzerine bir değerlendirme. *Ankara Üniversitesi SBF Dergisi*, 73(4), 1057–1094. https://doi.org/10.1501/sbfter_0000002527
- Çeliksoy, E., & Güler, T. (2020). Türkiye ve Fransa'da Yasama ve Yürütme. *Üçüncü Sektör Sosyal Ekonomi Dergisi*, 55(4), 2242--2253.
- Demir, F. (2000). Cumhuriyet Dönemi Türk Anayasaları ve Hükümet Sistemleri. 05 26, 2023 tarihinde <https://hukuk.deu.edu.tr:https://hukuk.deu.edu.tr/wp-content/uploads/2020/01/Fevzi-Demir3.pdf> adresinden alındı
- Demir, F. (2021). Public policy making in Turkey: Foundational concepts, current practice, and impact of the new presidential system. In *Public Policy Making in Turkey: Foundational Concepts, Current Practice, and Impact of the New Presidential System*. <https://doi.org/10.1007/978-3-030-68715-1>
- Duverger. (1980). New Political System Model Semi-Presidential Government. *European Journal of Political Research*, Sayı: 8(8), 165-187.
- Ekinci, A., & Yıldırım, S. N. (2017). Brezilya'nın Başkanlık Sistemi Uygulaması. İ. H. Dört Kıtada Başkanlık Sistemi (Ülke Örnekleriyle Hukukun Üstünlüğü içinde, Doğan, İlyas.; Ünver, Serdar. (s. 130-187). Ankara: Astana Yayınları.
- Elgie, R. (1993). The Politics of Semi-Presidentialism, <http://fdslive.oup.com/www.oup.com/academic/pdf/13/9780198293866.pdf>.
- Elgie, R. (2011). *Semi-Presidentialism Sub-Types and Democratic Performance* (Oxford Uni).
- Erdoğan, M. (2011). *Anayasa Hukuku*. Ankara: Orion Kitabevi.
- Eyüboğlu, E. (2014). Fransa: Parlamenter Bir VI. Cumhuriyet'e Doğru. İ. Kamalak içinde, (Yarı)Başkanlık Sistemi ve Türkiye: Ülkeler, Deneyimler ve Karşılaştırmalı Analiz. İstanbul: Kalkedon.
- Gökçe, A. (2019). Hibrit Rejimlerde Hükümet Sistemleri ve Demokrasi. *ASSAM Uluslararası Hakemli Dergi*, 6(15), 182-200.
- Gökçe, A. (2021). *Siyaset Bilimi Kavram ve Tanımlar*. Ankara: Nobel Yayınları.
- Gönenç, L. (2002). Prospects for Constitutionalism in Post- Communist Countries. In Brill.
- Gönenç, U. (2024). *Class , Capital , State , and Late Development*.
- Gözübüyük, Ş. (2013). *Anayasa Hukuku*. Ankara: Turhan Kitabevi.

- Gül, H., Kamalak, İ., & Gül, S. (2017). Amerikan Başkanlık ve Fransız Yarı-Başkanlık Sistemleri Işığında Türkiye'nin Cumhurbaşkanlığı Hükümeti Sistemi. *Strategic Public Management Journal*, 3(Özel Sayı), 101-120.
- Güler, H. S. (1994). The Post-1989 Experience With The Presidency In Turkey: A Comparative Analysis Of The Presidencies Of Turgut Öz Al And Süleyman Demirel With Special Reference To Their Respective Conceptions Of The Presidency.
- Güvenç, C., & Turan, H. (2024). Yasama, Yürütme ve Yargı Organları Çerçevesinde 2017 Anayasa Değişikliği Ve Cumhurbaşkanlığı Hükümet Sistemi. *Memleket: Siyaset Ve Yönetim*, 19(42), 81-108. <https://doi.org/10.56524/msydergi.1296750>
- Güvenç, C., & Turan, H. (2024). Yasama, Yürütme Ve Yargı Organları Çerçevesinde 2017 Anayasa Değişikliği Ve Cumhurbaşkanlığı Hükümet Sistemi. *Memleket: Siyaset Ve Yönetim*, 19(42), 81-108. <https://doi.org/10.56524/msydergi.1296750>
- Hekimoğlu, M. (2009). Anayasa Hukukunda Karşılaştırmalı "Demokratik Hükümet Sistemleri" ve Türkiye. Ankara: Detay Yayıncılık.
- Info.gouv.fr/Composition du Gouvernement. (2025). Composition du Gouvernement.
- İnceoğlu, S. (2011). Yeni Anayasada Bağımsız Bir Yargı İçin Neler Yapmalı? Uluslararası Belgeler Işığında Öneriler. *TBB Dergisi*, 24(95), 234-267.
- İşçi, D. (2021). Turkey's Presidential Executive System: Reactions From The Opposition Parties (Issue September).
- Jančić, D. (2013). Recasting monism and dualism in European parliamentary law: The Lisbon Treaty in Britain and France. Novakovic, Marko, (Ed.) *Basic Concepts of Public International Law: Monism and Dualism*, 803-829. <http://eprints.lse.ac.uk/51484/>
- Kaan, O. (2019). 2017 Anayasa Değişikliği'nde Yeni Hükümet Sistemi. *Kırklareli Üniversitesi İktisadi ve İdari Bilimler Fakültesi Dergisi*, 8(1), 14-28.
- Kaboğlu, İ. (2019). Anayasa Hukuku Dersleri. İstanbul: Legal Yayıncılık.
- Kahraman, M. (2012). Cumhurbaşkanının Halk Tarafından Seçilmesi ve Cumhurbaşkanı Seçim Kanunu. *SÜ İİBF Sosyal ve Ekonomik Araştırmalar Dergisi*, 263-287.
- Kariman, R. A. (2019). The Role Of Parliaments In The Semi-Presidential Systems: The Case Of The Federal Assembly Of Russia. In *School Of Social Sciences Of Middle East Technical University*.
- Kaynar, M. (2017). Anayasa, Yasama, Yürütme ve Yargı. Y. Taşkın içinde, *Siyaset Kavramlar, Kurumlar, Süreçler* (s. 285-325). İstanbul: İletişim Yayınları.
- Kömürcüler, Emin; Özçağ, M. (2015). Bir Regülasyon Kurumu Olarak Yargı Organı: Anayasa Mahkemesi ve Danıştay Kararlarında Devletin Düzenleyici Rolü. *Yönetim ve Ekonomi*, 22(1), 83-97.
- Kubicek, P. (2020). *European Politics; Third Edition*.
- Kuru, A. T. (2009). *Secularism and State Policies toward Religion: the United States, France, and Turkey*.

- Kuzu, B. (1982). Parlamenter Rejimde Devlet Başkanının 1961 -1982 Anayasalarında Durum.
- Kuzu, B. (1996). Türkiye İçin Başkanlık Sistemi. *Liberal Düşünce* I(2), 13-43.
- L'Europe, C. of E. de. (2004). *Constitutions of Europe* (2 vols.) Texts Collected by the Council of Europe Venice Commission.
- Lamba, M., Aktel, M., Altan, Y., & Kerman, U. (2014). Türkiye'de Bakanlık Tipi Örgütlenme: Tarihsel Ve Yasal Süreç. *Yönetim ve Ekonomi: Celal Bayar Üniversitesi İktisadi ve İdari Bilimler Fakültesi Dergisi*, 21(1), 173. <https://doi.org/10.18657/Yecbu.63403>
- Langer, M. (2017). *Prosecutors and Democracy*.
- Liu, H. (2024). A brief analysis of the differences between the French semi-presidential system and the American presidential system (Issue Icsed). Atlantis Press International BV. <https://doi.org/10.2991/978-94-6463-459-4>
- Publications, E. (2021). *The International Directory of Government 2021*. In Taylor and Francis Group. http://scioteca.caf.com/bitstream/handle/123456789/1091/RED2017-Eng-8ene.pdf?sequence=12&isAllowed=y%0Ahttp://dx.doi.org/10.1016/j.regsci.iurbeco.2008.06.005%0Ahttps://www.researchgate.net/publication/305320484_Sistem_Pembetulan_Terpusat_Strategi_Melestar
- Sartori. (1997). *Karşılaştırmalı Anayasa Mühendisliği*. (E. Özbudun, Çev.) Ankara: Yetkin Yayınları.
- Schmidt, V. (1999). The Changing Dynamics of State-Society Relations in the Fifth Republic. *West European Politics*, 22(4), 141–165. <https://doi.org/10.1080/01402389908425337>
- Senat, P. (2023). The Senate. In *Parliamentary and political channel*. <https://doi.org/10.5040/9781718225237.ch-004>
- Shugart, M. S. (2005). Semi-Presidential Systems: Dual Executive And Mixed Authority Patterns. *French Politics*, 3(3), 323–351. <https://doi.org/10.1057/palgrave.fp.8200087>
- Suleiman, E. N. (2016). *Politics, Power, and Bureaucracy in France: The Administrative Elite*.
- Sur, S. G. (2013). Türkiye'de Parlamenter Sistem Uygulaması. *Beykent Üniversitesi - Yütksek Lisans Tezi*.
- Tunçkaşık, H. (2017). Başkanlık Sistemi: Teori, Pratik ve Tartışmalar. S. Gökçimen içinde, *Karşılaştırmalı Hükümet Sistemleri* (s. 1-16). Ankara: TBMM Araştırma Hizmetleri Başkanlığı Yayınları.
- Yaman, A. (2016). Başkanlık Sistemi, Uygulamaları ve Türkiye'de Uygulanabilirliği. *Fırat Üniversitesi Sosyal Bilimler Dergisi*, 24(1), 83–98. <https://doi.org/10.18069/fusbed.92578>
- Yılmaz, F. (2018). Türkiye'de Anayasalarda Yürütme Süreci. *Uluslararası Akademik Birikim Dergisi*, 1(1), 43–54.
- Yılmaz, B. (2018). *The Presidential System in Turkey: Opportunities and Obstacles*.