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The Institution of the Vote of no Confidence in European Countries: Main Forms and Mechanisms of Implementation

Abstract: This article examines the procedural and functional variations of the vote of no confidence across European political systems. It explores how this parliamentary tool serves as a critical mechanism for governmental accountability and political stability, enabling legislatures to express formal disapproval of a government or executive leadership. The article details different forms of no confidence votes, including the constructive vote of no confidence practiced in countries such as Germany, Spain and Poland where a motion must include an alternative candidate to replace the incumbent government. The article outlines procedural requirements – such as initiation thresholds, timeframes for consideration, voting majorities, and restrictions on repeated votes – intended to prevent misuse and maintain governmental stability. The consequences of a successful vote of no confidence traditionally include the resignation of the government or the dissolution of parliament and calling of early elections, thus subjecting political disputes to public judgment. The study also considers the complexities of votes of no confidence in mixed presidential-parliamentary systems, where the balance of power between president and parliament affects the efficacy of this parliamentary tool. The aim of the article is to identify the main types and forms of votes of no confidence used in different European countries, to highlight the differences in procedural rules and mechanisms for implementing votes of no confidence, and to analyze the limitations that affect the frequency and success of votes of no confidence in the government.

Key words: vote of no confidence, government accountability, parliamentary control, political stability

Introduction

The essence of parliamentary governments lies in the formation of cabinets by political forces that command a majority in the parliament, ensuring ongoing cooperation between the government, which implements its agenda, and the parliament, which holds it accountable. This symbiotic relationship is crucial for maintaining political stability and effective governance. When cooperation fails, it often results in a governmental crisis. One of the fundamental instruments designed to resolve such crises within parliamentary systems is the vote of no confidence. This parliamentary tool enables the legislature to express formal disapproval of the government or its leadership, signaling the withdrawal of political support and potentially leading to the government's resignation or the dissolution of parliament.

Votes of no confidence constitute a classic mechanism of parliamentary control over the executive branch, embodying the principle of collective or individual responsibility of the government before the legislature. They serve as an essential check and balance ensuring that the government retains the confidence of the elected representatives. However, the forms, procedural requirements, and political consequences of no-confidence

votes vary significantly across European democracies, shaped by historical traditions, constitutional norms, and political culture.

The issue of the institute of votes of no confidence in European countries is actualized by the fact that in recent years parliaments have increasingly used this mechanism in the political process. Since 2022, there have been seven political crises on the European continent as a result of which parliaments have adopted votes of no confidence in governments.¹ In addition, in July 2025, President Ursula von der Leyen and her Commission had to endure a vote of no confidence. Although only 175 MEPs voted in favour of the vote of no confidence (360 did not support the motion, and 18 abstained), the European Parliament's support for the European Commission was shaken.

This article seeks to explore the procedural and functional variations of the vote of no confidence in European political systems. It aims to provide answers to the following key questions: What are the main types and forms of no-confidence votes used in different European countries? How do procedural rules and mechanisms for implementing these votes differ? What effects do various forms have on government stability? And how do restrictions such as initiation thresholds, voting majorities, and timing influence their frequency and success rates?

By examining these dimensions, the study contributes to the broader understanding of how parliamentary systems in Europe use the vote of no confidence to maintain governmental accountability and political stability, while addressing the challenges posed by diverse institutional frameworks.

Main types and forms of the vote of no confidence used in European countries

A vote of no-confidence, often referred to as a motion of no-confidence, represents a parliamentary procedure used in democratic systems especially parliamentary democracies to test the extent of majority support for government officials, usually the Prime Minister, although it may extend to ministers or speakers as well. In the event of a successful no-confidence vote, the head of government – The Prime Minister – must either resign before contesting the vote to avoid embarrassment or even may go as far as seek and request the intervention of the head of state, such as the President or Constitutional Monarch, to dissolve the parliament and pave the way for a new general election. However, the head of state such as the President or the King may decline to dissolve the parliament or call for an early election if an election has taken place recently or if they anticipate another parliamentary leader to secure a majority being a viable option (Basim

¹ In June 2022, the Bulgarian Parliament passed a vote of no confidence in the coalition cabinet led by Kiril Petkov. Twice in 2022, members of the Montenegrin Skupština (parliament) passed a vote of no confidence in the Prime Minister: in February, against Zdravko Krivokapić, and in August, against Dritan Abazović. In December 2022, the Slovak Parliament passed a vote of no confidence in the government of Prime Minister Eduard Heger. On 11 December 2023, the Sejm of the Republic of Poland passed a vote of no confidence in the government of Mateusz Morawiecki. On 16 December 2024, the German Bundestag passed a vote of no confidence in the government of Chancellor Olaf Scholz. On December 5, 2024, French President Emmanuel Macron was forced to accept the resignation of Prime Minister Michel Barnier after the French National Assembly (lower house of parliament) voted for a vote of no confidence in his government.

Jana et al., 2023). There are two types of votes of no confidence: constructive and simple (destructive by nature). Unlike the destructive type, a constructive vote of no confidence involves the parliament or one of its chambers expressing no confidence in the government while simultaneously appointing a new head of government.

In European countries, there are several forms of expressing a vote of no confidence in the government, which depend on the reasons and peculiarities of the procedure that have traditionally developed. First, it is important to distinguish the direct vote of no confidence – a separate, independent proposal not linked to other votes in parliament. This has a special, clearly defined constitutional procedure, which usually requires the support of a certain number of deputies and a defined voting time frame. At the same time, a vote of no confidence can be associated with other parliamentary controls, called an indirect vote of no confidence. It has two main forms:

1. Vote of no confidence following an interpellation. An interpellation is a written demand submitted by one or a group of deputies to the prime minister, a particular government member, or the government as a whole, requesting explanations about specific actions or general policy issues. The interpellation procedure involves a government report or a report by a government member, followed by a parliamentary discussion on the issue. The outcome can be a parliamentary resolution either approving or not approving the government's activities. Following disapproval, the question of mistrust toward the government or a member can be raised, which leads to a vote. For instance, according to the Statute of the Seimas of the Republic of Lithuania, an interpellation to the prime minister or minister can be submitted by at least one-fifth of Seimas members, and a written reply must be provided within two weeks. After consideration, the Seimas can adopt a no-confidence vote requiring the majority of votes from more than half of all members, which can result in the resignation of the government or minister (*Statute of the Seimas...*, art. 219–222). This method links parliamentary control with the government's political responsibility and is transparent, clearly showing the reason for dismissal – which can sometimes be difficult with a simple vote of no confidence. This procedure exists in many European countries, including Italy, Germany, Denmark, Spain, Slovenia, France, and Sweden. However, in France, although foreseen by Article 156 of the National Assembly Rules, the interpellation coincides procedurally with a motion of censure and is almost never used (*Règlement de l'Assemblée nationale*).
2. Vote of no confidence linked to parliamentary bill or resolution. For example, failure to approve the government's budget implementation report can trigger a no-confidence vote. There have been cases, such as in Denmark in 1984, where the government interpreted the rejection of the budget bill as a parliamentary vote of no confidence, which led to the dissolution of parliament and new elections (Damgaard, 2003, p. 287). In France, Article 49(3) of the Constitution links the question of the government's political responsibility to a vote on a specific bill. The absence of a reaction from the deputies in the form of a motion of no confidence, followed by its adoption, means that the bill is passed in the National Assembly without the need for a vote. From 1959 until early 2025, prime ministers have decided to apply this provision 116 times, and motions of no confidence have been submitted 87 times (*Engagements de responsabilité...*, 2025). A similar situation can occur in Poland

if the report on budget execution (called absolutorium) is rejected. The 1997 Polish Constitution does not explicitly provide legal consequences like government or minister resignation for such rejection, but it can lead to parliamentary responsibility. Previously, the 1992 Small Constitution had such a provision (art. 22) stating that failure to receive absolutorium requires the Council of Ministers to resign (*Ustawa konstytucyjna...*, p. 401).

Special attention should be paid to the consideration of the forms of expressing no confidence in the government in Great Britain. Due to the fact that in this country the relations between the bodies of state power are regulated exclusively by the norms of constitutional rules of conduct that have traditionally developed, there is no single clearly defined parliamentary procedure that can lead to the resignation of the government. A vote of no confidence can take the form of both an independent separate proposal and an amendment to another proposal that is the subject of the work of the parliament. And if, in the first case, it is clearly stated that the government has lost the confidence of the parliament, for example, “regarding the ability to conduct state affairs,” as was the case in 1965, or “regarding the competence of the government to manage the economic affairs of the country” in 1966, then in the second case, the content of the proposal can be expressed quite generally. If the wording is unclear and it is difficult to understand whether it is a vote of no confidence or just a critical assessment of the government’s activities, as was stated in the resolution of the House of Commons in 1981: “The House has no confidence in the economic policy of the government... and at the same time calls on the government to submit to Parliament proposals at the end of the year to reduce the existing catastrophic trends” (Kelly, Powell, 2010, p. 22), then it is clear that this was not regarded as a vote of no confidence.

Let us briefly list the main forms of no-confidence votes known to the parliamentary practice of Great Britain:

1. An amendment to a bill that is the subject of parliamentary debate, but it can be interpreted as such only when its purpose is not to modify the bill, but to dismiss the government.
2. A vote on the “royal speech” (the government’s legislative program), which is announced before each session of parliament. And although the parliament does not actually provide for the rejection of this speech, the opposition can propose amendments to it, which will be interpreted as a motion for a vote of no confidence. The approval of such an amendment by the House of Commons will mean expressing a vote of no confidence in the government. This is exactly the situation that developed in January 1924, when a vote of no confidence was expressed in the government of S. Baldwin.
3. A motion to postpone a parliamentary session, again in clearly defined cases, for example, when the Prime Minister links this to a vote of confidence in the government or if a similar statement comes from the leader of the opposition (Wiecech, 2010, p. 95).
4. Rejection of a government bill by the parliament. This may be a finance bill or a bill that was a key promise in the election program of the government party (*Parliamentary Elections*, 2022, p. 3). But it should be noted that the once relevant statement that every defeat of the government during a parliamentary vote on a government bill

means a loss of confidence in the government has long lost its relevance. This can only happen if the government declares in advance that it links the adoption of the bill to a vote of confidence.

Mechanisms and procedures of the vote of no confidence

The procedure for adopting a vote of no confidence in the government by the parliament is quite complicated, which should exclude attempts by certain parliamentary forces to use this institution for their own purposes without the explicit support of the majority of deputies, as well as the possibility of excessive parliamentary influence on the government and destabilization of the system of public administration. Therefore, the Constitutions of European countries establish requirements for initiating and adopting a vote of no confidence in the government, which can be reduced to the following areas.

1. A vote of no confidence in the government can be expressed only by the chamber to which it is responsible (if it is a bicameral parliament). This is, as a rule, the lower chamber of parliament, whose representatives are elected by direct universal suffrage. The exceptions to this rule are Italy and Romania, where a vote of no confidence is adopted by both chambers of parliament. In Great Britain, until 1832, the House of Lords also had the opportunity to express a vote of no confidence, but since then only the House of Commons has had such a prerogative. The House of Lords will continue to have procedurally possible vote of no confidence, but it will not have legal consequences in the form of resignation of the government or dissolution of parliament. An example of a vote of no confidence initiated by the House of Lords, as an exception, was the 1993 proposal rejected by the house.
2. A motion of no confidence is collegial in nature and must be put forward at the initiative of a clearly defined part of the deputies. This part of the deputies can be from 1/10 to 1/4 of the members of parliament. At the same time, a feature of such parliamentary monarchies as Belgium, Denmark and the United Kingdom is that a vote of no confidence can be initiated by any member of parliament. Let us recall that in Ukraine, 1/3 of the deputies of the Verkhovna Rada can initiate a vote of no confidence in the Government, and this indicator is the highest among all European countries.
3. Mandatory postponement of consideration of the motion for a specified time. This is done so that the decision is not made under the influence of emotions without appropriate reflection and assessment of the situation. At the same time, government representatives have the opportunity to obtain additional information, discuss the situation with members of parliament, influence the decision-making process and assess its possible consequences for the government. It should be noted that such a norm narrows the control powers of parliament in the process of applying a vote of no confidence. For example, the break between the proposal and the vote on it is two days in France, Austria, Germany, Portugal, Belgium, three days in Italy and Sweden, five days in Spain, seven in Poland. Only in some countries this norm is not provided for and the proposals of a vote of no confidence are put to a vote according to the usual procedure, such as in Luxembourg and the Netherlands.

4. Establishing a time limit for debate on the proposal of a vote of no confidence. This norm, on the contrary, is intended to prevent the decision from being delayed. For example, in Portugal, no more than three days are allotted for debate, in Lithuania – five days.
5. Adoption of a decision on no confidence in the government by an absolute or relative majority of members of parliament. For example, in Spain, Portugal, France and Sweden, such a decision requires an absolute majority of votes, and in Austria, Denmark and Italy – a relative majority.
6. Restrictions on the application of a repeated no confidence procedure. This norm can take various forms. The most common is a ban on re-initiating a no confidence vote within a certain period of time if the previous proposal was rejected. In Portugal and Romania, a question of no confidence in the government cannot be raised twice during the same parliamentary session, in Bulgaria the corresponding period is six, and in Estonia, Croatia and Poland – three months. However, in Poland, a second motion of no confidence in the government can be submitted before a previously determined deadline, provided that it is proposed on behalf of deputies who make up a quarter of the lower house of parliament. In France, the restriction is that a deputy cannot sign more than three resolutions of censure during a regular session and one during an extraordinary session.

The following pattern is also important: the fewer restrictions on the application of the no-confidence motion procedure, the stronger the role of parliament in the interaction process; under conditions of a complex procedure, on the contrary, the role of the government in relations with parliament is strengthened. The adoption of the latest constitutions has shown a tendency to limit the right of parliament to express a no-confidence motion, although, for example, in France, after the adoption of amendments to the Constitution in 1995, such powers of parliament were expanded. In the old version of the Constitution, Article 49 stated that if a no-confidence motion is rejected, its signatories cannot propose a new one at the same session, except in the case when the Prime Minister may, after discussion in the Council of Ministers, hold the government responsible before the National Assembly for voting on the draft law. In this case, this text is considered adopted if only a no-confidence motion submitted within twenty-four hours after that is not put to a vote. In accordance with the amendment to the Constitution in 1995, Article 49 received a new wording: “Except for the cases provided for in the subparagraph below, a deputy may not sign more than three votes of no confidence in one regular session and more than one in one extraordinary session” (*Loi constitutionnelle...*, 1995).

Almost all of the above-mentioned special requirements for the procedure for a vote of no confidence, inherent in the state systems of European countries, are absent in Great Britain. The fact is that a motion of no confidence submitted to the House of Commons is not much different from other projects considered in parliament. It can be proposed by an individual deputy, although in practice only the proposals of the leader of the opposition are considered, only they, according to the constitutional rules of conduct, must be immediately debated, having precedence over other matters submitted to parliament. Moreover, if such a proposal is made during a break in the parliament, it may even be specially convened for its consideration (Kelly, Powell, 2010, pp. 3, 5–6). There are no restrictions on the number of proposals that the opposition leader can propose during the session, as

well as the requirements of a qualified majority for their adoption. However, despite the fact that the British system lacks classic mechanisms for rationalizing the government's responsibility, it is very rare for a motion of no confidence to be adopted. Only 4 times in the country's history has such a proposal been adopted – in 1895, twice in 1924 and in 1979. This is due to the strongest element that rationalizes the parliamentary responsibility of the government in Great Britain – the presence of a stable two-party system, which allows the creation of single-party majority governments. The exception to this rule is the current coalition government, formed after the 2010 elections, which calls for the search for new mechanisms to rationalize the parliamentary responsibility of the government. In particular, the 2010 Coalition Agreement between the Conservative Party and the Liberal Democrats actually includes such a proposal – the adoption of a law that would introduce the need for a qualified majority of 55% to pass a motion of no confidence (*The Coalition...*, 2010, p. 26).

We have considered the main forms and procedures for implementing a vote of no confidence in the government in European countries, and now we will analyze the consequences that the adoption of such a decision may have for the subjects of state power and the system of public administration. It is quite obvious that the main result of a parliamentary vote of no confidence in the government is its resignation. However, the executive branch's response to the parliament's decision may be its dissolution and the appointment of new elections. It is precisely this possibility that ensures the balance of the branches of state power that most European constitutions provide for. The dissolution of the parliament by the head of state (usually at the proposal of the prime minister) brings the conflict between the legislative and executive branches of power to the court of voters. If they support the government, as a result of the elections in parliament, a majority of its supporters will be formed, and vice versa, if they do not agree with the government, then the composition of the parliament will be appropriate, and the government will be changed. It is clear that the dissolution of the parliament, which may be a consequence of a vote of no confidence, destabilizes the system of public administration and requires significant material resources. Therefore, there are also certain limitations on this prerogative of the executive. There are prohibitions on dissolving the parliament during a certain period after its election and until the end of the term of office of the President, as is for example stipulated in Art. 172 of the Constitution of Portugal: "The Assembly of the Republic may not be dissolved during the six months following its election, during the last six months of the President of the Republic's term of office, or while a state of siege or a state of emergency is in force" (*Constitution of the Portuguese Republic*). There may be other limitations on dissolution, which are clearly illustrated by the examples of countries such as Austria and Hungary. The Federal President of Austria can dissolve the National Council, but for the same reason he can do so only once (*Austria, the Federal Constitutional Law...*, art. 29). The Hungarian National Assembly may be dissolved by the President if it has passed a vote of no confidence in the government at least four times within 12 months during one term of office (*The Constitution of the Republic of Hungary*, art. 28).

When considering the specifics of the application of a vote of no confidence in European countries, attention should be paid to the complexity of its adoption in mixed presidential-parliamentary and parliamentary-presidential republics. This is influenced

by various factors, starting from the initiation procedure and ending with the possible consequences of adopting a vote of no confidence. In some of these countries, a constructive vote of no confidence is generally provided for, such as in Poland and Slovenia, the application of which is quite difficult for the parliament. In other countries, a motion for a vote of no confidence can be initiated by a sufficiently solid group of parliamentarians, and adopted only with the support of an absolute majority. Finally, the presence of strong presidential power leads to the fact that the parliament is actually limited in applying a vote of no confidence due to the simplified procedure for its dissolution by the head of state. An example of this is France, where the President of the Republic may, after consulting the Prime Minister and the Presidents of the Houses of Parliament, declare the National Assembly dissolved. No further dissolution shall take place within a year following said election (*Constitutional Council*, art. 12). Lukasz Jakubiak notes the presence of a certain paradox of the broadly understood rationalization of parliamentarism, one that not only strengthens the government in its relations with parliament, but also significantly raises the constitutional status of the president, who – by equipping him with significant instruments of political arbitration – is responsible for restoring the necessary systemic balance. This paradox lies in the fact that, as a result of this rationalization, the government is, on the one hand, immune to hostile actions by the parliamentary opposition (hence the negligible effectiveness of initiatives aimed at passing a vote of no confidence), and on the other – the clearly revalued head of state rises to the rank of an entity capable of independently influencing changes in cabinets, which are in most cases perceived as presidential cabinets (Jakubiak, 2019, p. 58–59).

It should also not be overlooked that under the conditions of the functioning of a mixed presidential-parliamentary republic, the parliament's insignificant influence on the government is felt, in contrast to the similar influence of the president. This is confirmed again by the practice of the already mentioned France, where, according to the Constitution, the government's resignation occurs after a vote of no confidence by the parliament and the President formally cannot do this alone, but in practice he does it upon the proposal of the head of government. Given the above, the significance of the institution of a vote of no confidence in mixed republics is somewhat less than in parliamentary ones, where the president cannot dismiss the government alone, and a vote of no confidence is the main mechanism for controlling the government.

Constructive vote of no confidence in European countries

The type of collective responsibility of the government, which was already mentioned above, as a constructive vote of no confidence, deserves special attention. The constructive vote of no confidence is a variation on the motion of no confidence that allows a parliament to withdraw confidence from a head of government only if there is a positive majority for a prospective successor. The principle is intended to ensure governments' stability by making sure that a replacement has enough parliamentary support to govern (Lento, Hazan, 2022). This means that a parliamentary decision of no confidence in the incumbent Prime Minister is simultaneously a decision to express confidence in the new Prime Minister. A constructive vote of no confidence is one of the

most effective methods of rationalized parliamentarism, aimed at preserving the stability of the government while preserving the main features of the parliamentary system.

Let us turn to the history of the creation of this institution. A constructive vote of no confidence appeared in the German state doctrine during the Weimar Republic (1919–1934) as an essential element of the dualistic concept, which provided for the balance of the president and parliament. The weakness of the Weimar coalition governments, which led to a deep parliamentary, and as a result, economic crisis, prompted the search for state mechanisms that would limit the excessive dependence of the government on parliament and at the same time make it possible to create and operate a cabinet that would rely more on the authority of the head of state. Such aspirations were embodied in the concept of the so-called positive vote of no confidence, which made the resignation of the government dependent on the ability of the parliamentary opposition to form a new government, while at the same time relieving the president of the obligation to recall the chancellor and the government, in respect of which the parliament passed a vote of no confidence without providing a real personal and programmatic alternative. This concept, which for some time was considered an attempt to undermine the essence of the system of parliamentary governments, was implemented in the Basic Law of the Federal Republic of Germany in 1949 20 years later. Later, a constructive vote of no confidence was introduced in the state systems of other states – Spain, Poland, Belgium, Hungary, Slovenia.

Let us turn to the features of the regulation and practical application of a constructive vote of no confidence in individual European countries. In its pure form, a constructive vote of no confidence is enshrined in Germany. In Art. 67 of the German Constitution of 1949 states: (1) The Bundestag may express its lack of confidence in the Federal Chancellor only by electing a successor by the vote of a majority of its Members and requesting the Federal President to dismiss the Federal Chancellor. The Federal President must comply with the request and appoint the person elected. (2) Forty-eight hours shall elapse between the motion and the election (*Bundesministerium der Justiz*).

Countries that have adopted the constructive vote of no confidence procedure have certain peculiarities in its application. The main difference is that only in Germany and Hungary the vote of no confidence is expressed personally to the head of government, who is responsible to the parliament for both his activities as a whole and for his individual departments. The adopted constitutional solution is based on the principle that only the head of government received the confidence of the parliament during his election to office and only he can lose it as a result in the event of a vote of no confidence being expressed to him. Unlike this option in other countries, no confidence is expressed to the government as a whole, and not to its head.

The constructive vote of no confidence procedure in Poland and Spain is very similar to the German one. According to Art. 158 of the Constitution of the Republic of Poland of 1997 the Sejm shall pass a vote of no confidence in the Council of Ministers by a majority of votes of the statutory number of Deputies, on a motion moved by at least 46 Deputies and which shall specify the name of a candidate for Prime Minister (*Konstytucja Rzeczypospolitej Polskiej*). In Spain the motion of censure must be proposed by at least one tenth of the Members of Congress and shall include a candidate for the office of the Presidency of the Government (*Senate of Spain*, art. 113). The procedure for a vote of

no confidence in Belgium is quite peculiar, as it can be both constructive and destructive according to the Constitution. However, if the parliament adopts a destructive vote of confidence, the King has the right to dissolve the House of Representatives (*The Belgian Constitution*, art. 46). A feature of a constructive vote of no confidence in the Republic of Slovenia is that the procedure for electing a new Prime Minister by the lower house of parliament, the Assembly, is itself considered a manifestation of no confidence in the government and means that the Prime Minister currently in office is considered to be relieved of his official duties (*The Constitution of the Republic of Slovenia*, art. 116].

Given that the resolution of the parliament on a constructive vote of no confidence actually considers two issues at once – the vote of no confidence itself and the appointment of a new Prime Minister, it has a special form. For example, according to Article 97 of the Rules of Procedure of the German Bundestag, it can be put forward by at least one fourth of the constitutional composition and only together with the nomination of a candidate for the position of Chancellor. Proposals that do not meet these requirements cannot be included in the agenda of the Bundestag (*Bundesministerium der Justiz*). Therefore, the proposals for a vote of no confidence and for the election of a new Chancellor, despite their actually different content, constitute a single legal act. Thus, the constructive vote of no confidence adopted by the Bundestag in 1982 had the following wording: “The German Bundestag expresses a vote of no confidence in Federal Chancellor G. Schmidt and elects Deputy G. Kohl as his successor to the position of Federal Chancellor of the Federal Republic of Germany. We ask the Federal President to dismiss Federal Chancellor G. Schmidt” (Zwierzchowski, 2009, p. 87). Similar wording is used in proposals in other countries that have a constructive vote of no confidence procedure.

In general, the use of such an institution of parliamentary accountability of the government as a constructive vote of no confidence is an exceptional phenomenon, which is associated with the complexity of this procedure. Like any process, a constructive vote of no confidence has both positive and negative sides. Among the positives, the following should be highlighted:

1. A constructive vote of no confidence as one of the main mechanisms for rationalizing the parliamentary system strengthens the stability of coalition governments and prevents the parliamentary dictate of the so-called negative majority. The negative majority here should be understood as that critically minded part of the parliament that is able to overthrow the government, but cannot unite to form a new cabinet.
2. Such a system allows preventing long-term government crises caused by the fact that the parliament, having removed the government, cannot find a replacement for it for a long time.
3. Practice shows that the institution of a constructive vote of confidence has allowed optimizing certain processes and relations within the parliament. In particular, this norm has deprived the meaning of a motion of no confidence if there are no real chances to create a new government coalition. It can also be a priori an obstacle to the split of the existing government coalition, whose deputies, although they may oppose the government, are likely to not support the candidacy of the new chancellor during the vote of no confidence. This is exactly the situation that occurred in the case we have already mentioned when the Bundestag rejected a vote of no confi-

dence in 1972. Despite the fact that the majority was ready to oppose the incumbent Chancellor W. Brandt, it was unable to support the candidacy of the opposition leader R. Barzel. Thus, the existence of a constructive vote of no confidence deprives the meaning of introducing a motion of no confidence when the parties have no real grounds to create a new government majority.

There are also a number of critical remarks regarding the institution of a constructive vote of no confidence. Thus, according to K. Sontheimer, a constructive vote of no confidence cannot prevent a government in crisis from falling, which is confirmed by the example of the fall of L. Erhard's cabinet in 1966, after the withdrawal of representatives of the Free Democratic Party of Germany from the government coalition (Sontheimer, 1998, p. 178).

The use of constructive votes of no confidence in practice, according to Prado, can be used due to its "destructive" nature (to overthrow the government), rather than for constructive purposes. Analyzing the vote of no confidence in Spain, which was put forward against the government led by former Prime Minister Mariano Rajoy on June 1, 2018, he came to the conclusion that political groups, using this instrument, were not thinking about a stable future, but about the need to overthrow a government mired in corruption.

The author agrees with this opinion, but believes that in reality a constructive vote of no confidence, like any other rationalization of the parliamentary system, cannot in itself ensure government stability. Along with a constructive vote of no confidence, there are also other means of combating government crises. In particular, in a situation where the government loses the support of the parliament, it can initiate a vote of confidence for itself, and in case of failure to receive it, propose to the head of state to dissolve the parliament and call new elections, which takes place in the practice of European countries. Therefore, a constructive vote of no confidence is not a panacea; there is a set of procedures provided for by the constitution of each individual country to overcome administrative crises.

Critics of a constructive vote of no confidence point out that it weakens the system of parliamentary governments, because it can lead to the functioning of a government that currently does not have the support of the parliament (Zwierzchowski, 2009, pp. 88–89), and this significantly weakens the control function of the parliament. Indeed, according to the German Constitution, if the opposition has a majority but is unable to elect a new chancellor, the minority chancellor remains in office. It is clear that the benefits of such a situation, when the government is not supported by a majority in parliament, are very small for the system of public administration. In this case, the Constitution gives him the opportunity, together with the president, to try to overcome the existing government crisis. He does this by asking parliament for a vote of confidence for himself, and if it is not received, he suggests that the president either dissolve parliament or declare a state of legislative necessity. This situation most recently occurred in 2005 and 2024. Most recently, in December 2024, Prime Minister Olaf Scholz requested a vote of confidence in his government after the ruling tripartite coalition collapsed in early November. After the government did not receive confidence, German President Frank-Walter Steinmeier decided to dissolve parliament and early elections were initiated. In 2005, the current chancellor, Gerhard Schröder (like Scholz, a social democrat), provoked early elections using a similar procedure.

Conclusions

In conclusion, the vote of no confidence remains a fundamental parliamentary instrument for ensuring government accountability and maintaining political stability within European democracies. Its diverse forms – ranging from direct independent motions to those associated with interpellations or linked to specific parliamentary bills – reflect the constitutional traditions and political cultures of individual countries. Procedural mechanisms, including initiation thresholds, required majorities, timing regulations, and restrictions on repeated votes, are thoughtfully designed to balance effective parliamentary oversight against the need to prevent political instability and excessive governmental disruption.

The institution's significance varies notably between pure parliamentary systems and mixed presidential-parliamentary republics. In pure parliamentary systems, the vote of no confidence is a crucial tool for legislative control over the executive, often leading directly to government resignation or parliamentary dissolution. Conversely, in mixed systems like France, the enhanced role of the president as political arbiter modifies the vote's impact, diminishing parliamentary influence and increasing executive discretion in managing government crises.

The constructive vote of no confidence, adopted in several European countries, illustrates an advanced mechanism aimed at rationalizing parliamentarism by coupling government dismissal with an immediate alternative leadership proposal. This approach fosters governmental stability by preventing prolonged crises and ruling through mere negative majorities. Nevertheless, it is not a panacea; its effectiveness depends on broader institutional contexts and complementary constitutional mechanisms, such as votes of confidence initiated by the government or presidential dissolution powers (Prado, 2019, p. 1266).

As the analysis has shown, a constructive vote of no confidence is directly a tool for overcoming a government crisis, unlike a destructive vote of no confidence, which is only a stage in this process and, moreover, can lead to the government crisis developing into a crisis of the entire system of public administration. This advantage of a constructive vote of no confidence is due to the fact that it allows the parliament to implement two functions at once – control and establishment. The following functions of a constructive vote of no confidence can be distinguished: 1) dismissal of a government that does not enjoy the support of the parliament; 2) election by the parliament of a new head of government and simultaneous granting of confidence to him; 3) preservation of the stability of the system of public administration.

Ultimately, the vote of no confidence embodies a delicate equilibrium: it empowers parliaments to hold governments accountable while safeguarding against frivolous or destabilizing challenges to executive authority. Its design and application across Europe demonstrate an ongoing effort to rationalize parliamentary government, adapt to evolving political realities, and uphold democratic legitimacy through structured mechanisms of control and stability.

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Instytucja wotum nieufności w krajach europejskich: główne formy i mechanizmy wdrażania

Streszczenie

Niniejszy artykuł analizuje proceduralne i funkcjonalne różnice wotum nieufności w europejskich systemach politycznych. Bada, w jaki sposób to narzędzie parlamentarne służy jako krytyczny mechanizm odpowiedzialności rządu i stabilności politycznej, umożliwiając organom ustawodawczym wyrażenie formalnej dezaprobaty dla rządu lub kierownictwa wykonawczego. W artykule szczegółowo opisano różne formy wotum nieufności, w tym konstruktywne wotum nieufności praktykowane w krajach takich jak Niemcy, Hiszpania i Polska, w których wniosek musi zawierać alternatywnego kandydata na miejsce głowy obecnego rządu. Artykuł przedstawia wymogi proceduralne – takie jak progi inicjacji, ramy czasowe rozpatrzenia, większość głosów i ograniczenia dotyczące powtarzalności procedury – mające na celu zapobieganie nadużyciom i utrzymanie stabilności rządu. Konsekwencje udanego wotum nieufności tradycyjnie obejmują rezygnację rządu lub rozwiązanie parlamentu i zwołanie przedterminowych wyborów, poddając w ten sposób spory polityczne osądowi publicznemu. Badanie uwzględnia również złożoność głosów wotum nieufności w mieszanych systemach prezydencko-parlamentarnych, w których równowaga sił między Prezydentem a Parlamentem wpływa na skuteczność tego narzędzia parlamentarnego. Celem artykułu jest wskazanie głównych rodzajów i form wotum nieufności stosowanych w różnych krajach europejskich, różnic w przepisach proceduralnych i mechanizmach przeprowadzania wotum nieufności oraz analiza ograniczeń, które wpływają na częstotliwość i skuteczność wotum nieufności wobec rządu.

Słowa kluczowe: wotum nieufności, odpowiedzialność rządu, kontrola parlamentarna, stabilność polityczna

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