

Local Government Systems in United States of America and Britain: A Comparative Analysis and Lessons for Nigeria

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Abstract

The essence of the existence of Local Governments is to decentralise the authority and power of the Central or State Government and bring development to the grass-root. Scholars have failed to compare and analyse Local Government systems in USA and Britain to determine whether the Local Governments have achieved relative administrative and financial autonomy and grass-root democracy, and are efficient in the delivery of public goods and services at the grass-root, to serve as a model for Nigeria. The study which is descriptive relied on secondary source of data and was anchored on Democratic-participatory and Efficiency theories. It was revealed that while the Local Governments in USA and Britain enjoy relative autonomy, are democratically constituted/run, and efficient in the delivery of public goods and services at the grass-root, the reverse is the case in Nigeria. It concluded that Local Governments in USA and Britain have performed better than those in Nigeria. It recommended that State Governments should grant the Local Governments in Nigeria relative administrative and financial autonomy and ensure that efficient delivery of public goods and services and participatory democracy are achieved at the Local levels.

Keywords: Efficiency, Fiscal autonomy, Local authority, Local government, Participatory-democracy

Introduction

Local Government encompasses a vast array of issues such as structure, autonomy, democracy, efficiency, finance, decentralization of functions, territorial size, population and system of administration. The arrangement under which a Local Government is administered essentially depends on the system of government of the country concerned. Local Governments all over the world strive to meet the needs and demands of the people at the grass-roots level of government. The relevance of a comparative study of Local Government of countries lies in the fact that the findings obtained in such study can be utilized by the State or country to improve its Local Government system in terms of structure, functions, and operations, with a view to improving the living standard or condition of the people resident at the Local Government areas. The main focus of a comparative study of the Local Government systems of different countries is to measure the striking similarities and distinctions, and examine the extent to which solutions found in one Local Government can be applied to others.

Essentially, a comparative study of Local Government of countries affords these countries a vantage ground to evaluate their policies, strategies and programmes in order to advance the Local Government system and achieve a better living condition for rural dwellers. In many countries of the world, the reason for the existence of the Local Government include the need to decentralize the functions of the central and State governments and promote participatory democracy at the grass-roots level. The United States of America (USA) and Britain operate Federal and Unitary systems of government respectively. In a federalism, the powers and functions of government are shared between the central government and the other units in a manner that ensures that each tier of government has and exercises its constitutionally assigned duties and functions independent of the others (Chand, 1982: 250; Malemi, 2006: 26; Ikeanyibe, 2004).

The United States of America is a federalism and its Local Governments are created by the laws of the various states. Federalism may be strong or weak. In a strong federalism, the federal government is powerful, domineering and omnipotent. In a fiscal federalism, the source of finance determines the strength and power of the federating units. USA operates a weak federalism because the states control their resources, pay taxes, royalties and other forms of levies to sustain the federal government. In a unitary government on the converse, all the governmental powers reside with the central government. Other units of government do not have their independent existence. Their existence, functions and spheres of activities are provided for and determined by parliamentary Acts. Britain adopts a unitary government. Local authorities in Britain are created by parliamentary Acts which define their functions, duties and spheres of influence or activities (Chand, 1982: 251; Malemi, 2004: 26). The concept of Local Government, whether in a federal system as found in USA or in a unitary arrangement as practised in Britain, is to decentralize authority and powers from the central government to the grass-roots level of government to ensure effectiveness, efficiency, economy, grass-roots democratic-participation and administrative convenience (Alao et al 2015; Ohiole and Ojo 2014). Thus according to Osaghae (1990:84) as quoted in (Alao et al 2015), the concept of Local Government means “a system of dispersal of power from a central government to other units or agencies of government”.

The noble idea of the world society for the existence of Local Governments is to decentralize authority and power in order to provide a forum for democratic-participation and promote effective and efficient delivery of services at the grass-roots. USA and Britain are two major democracies in the world. Scholars have not done enough to compare and analyse Local Government systems in USA and Britain with a view to determining whether they have achieved relative administrative and financial autonomy and grass-roots democracy; and whether they are efficient in the provision and delivery of public goods and services at the grass-roots, so as to serve as models for Nigeria. The main objective of this paper is to compare and analyse the Local Government systems in USA and Britain, and draw lessons for Nigeria.

The specific objectives are:

- To examine the level of autonomy of the Local Governments in USA and Britain.
- To compare the degree of democratic governance at the grass-roots in both countries.
- To find out the various sources of revenue of Local Governments in both countries.
- To determine how efficiently the Local Governments in the two countries have performed to serve as models for Nigeria.

The work which is descriptive in nature is based on secondary source of information on Local Government system in USA and Britain. The secondary data source includes relevant books, scholarly journals, newspapers, magazines and internet. Content analysis of the documents was made.

Theoretical Framework

This study adopts democratic-participatory and efficiency theories to compare and analyse the Local Government systems in USA and Britain, and draw lessons for Nigeria.

Democratic-Participatory Theory

The focal point of the **Democratic-Participatory** theory is that Local Government is a cardinal factor in true democracy. A true democracy should have its foundation built from Local Government and not from the National and State levels, otherwise, the democratic arrangement is bound to totter and funder. Local Government is important in a true democratic system because it serves as training ground for emerging state and national leaders. The essential nature of Local Government lies in the fact that it provides the citizens the platform to have a voice in their own affairs, contribute to and participate in governance. This participation is fundamental to the

growth of democracy. The involvement of the citizens in the planning, execution and assessment of projects designed to improve their living condition promotes community commitment to the socio-economic development. Local Government is best regarded as the nursery bed of democracy (Cole,1974:64).

A foremost proponent of this theory is John S. Mills who exerted much influence on this theory through his work on utilitarianism, liberty and representative government. He states that the Local Government is a prime element of democracy irrespective of the service it provides for it. He further states that government is truly representative when all types of people can take part. The Local Government level offers the closest things to widespread contribution and participation. Panther (1953) lends his support to the advocacy. He claims that participation is vital to democracy since it is in the community that people appreciate and tolerate each other's view and learn the art of practical politics. According to Panther, Local Governments have become the training ground for political elites for higher level of government. Evidence of the advocacy abounds in some parts of the globe. As cited in Alao et al (2015); Tony (2011); Ajayi (2000); and Ademolekun, Olowu and Taleye (1988), President Shehu Shagari, Umar Dikko, Ali Mongumu and many others began their journey to national leadership from the Local Government as the first rung in the ladder. In Delta State of Nigeria, particular instances also abound. The Governor of Delta State, Senator Dr. Ifeanyi Okowa began his political journey from the Local Government level. Also, Senator James Manager representing Delta South Senatorial district, began from the Local Government. David Butler in 1964 carried out a study on the general elections held in Britain and the study revealed that 53% of the labour members of Parliament and 45% of the defeated labour parliament candidates were former Local Authority Councillors (Noun, 2010). The fact that Local Government is a nursery for democracy is further confirmed by Mackenzie (1954) in a work he proved that more than half of the Deputies and approximately the same number of Senators in Italy rose from the Local Government level. The goals of democratic-participatory theory may be difficult to achieve in developing democracies due to institutional arrangement and orientation. These inhibiting factors notwithstanding, the commanding significance of the theory continues to tower. Participatory-democracy at the Local Government level can record a great measure of success albeit with its attended difficulties (Alao et al 2015; Aragon and Sanchez-pages, 2008).

Efficiency Theory

The efficiency theory arose as a protest to the democratic-participatory theory advocated by J.S. Mills and Bricks. The thrust of the efficiency theory is that the main purpose for the existence of Local Government is to provide services to the local people. Thus, (Sharpe 1970:168), one of the major proponents of the theory has strongly contended that Local Government exists as the most efficient agent of government to provide those services that are essentially local in nature. He maintained that Local Government is the only or indispensable institution that has the capacity to carry out those services most efficiently and satisfactorily. It has a duty not to approximate the efficiency standard but to execute the assigned local performance at the highest efficiency standard and in the best tradition demanded by the Central Government. This advocacy finds the countenance of Mackenzie (1954:14) cited in Alao et al (2015) who stated that "Local Government exists to provide services and it must be judged by its success in providing services up to a standard measured by national inspectorate"

The efficiency theory is premised on the fact that many of the modern States are large in geographical area and population; it thus becomes very difficult, if not impossible for the Central Government to meet the basic needs of citizens resident at distance ends. This makes it imperative for the Central Government to decentralize authority and power to lower units in order to facilitate efficiency and administrative convenience. Essentially, Local Governments are created to decongest the burden and function of the Central Government in a unitary government or State in

a federalism and to deliver the basic needs to the local people. The efficiency theory therefore sees the Local Governments as the efficient agents of the Central or State Government to provide public goods and services to the people at the distant units of Government (Alao et al 2015). The theory has been criticized by (Sharpe 1970:168) on the ground that Local Government has been recognised as a bulwark of liberty and equality, and has failed to demonstrate that it has efficiently carried out or performed its obligation as a governmental unit or agency for providing services that are essentially local in nature (Alao et al 2015).

Local Government

The United Nations Articles of declaration, 1948 explained that Local Government is a political sub-unit or division of a nation which is constituted by law and has substantial control of local affairs including the power to impose taxes or to exact labour for prescribed purposes. The New Columbia Encyclopaedia (4th Ed) defines it as the “sub-political administration of the smallest sub-divisions of a country's territory and population”. Ugwu (2002) defines Local Government as “the lowest unit of administration to whose laws and regulations communities, who live in a defined geographical area with common social ties are subject. In the 1976 Local Government Reform, the Federal Government of Nigeria the presented Local Government as:

Government at local level exercised through representative councils established by law to exercise specific powers within defined areas. The powers should give the council substantial control over local affairs as well as the staff and institutional and financial power to initiate and direct the provision of services and to determine and implement projects so as to complement the activities of the State and Federal Government in their areas and to ensure, through devolution of functions to these councils and through the active participation of the people and their traditional institutes, that local initiative and responses to local needs and conditions are maximized.

From a the reading of the foregoing definitions, the following features peculiar to Local Governments have emerged: Local Government is government at the grass root; it has its autonomous existence and is endowed with legal status; specific powers are reserved for it; it can impose taxes and incur expenses; it exists within a defined territory; it is seen as a distinct tier of Government; it must provide authority over a given population; it must provide avenues for the promotion of the welfare of the members of the community; and it comprises elected members such as Chairman and Councillors.

Significance of Local Government

The concept of Local Government has emerged out of the necessity or compulsion to decentralize authority and powers in order to decongest the burden and functions of Central Government or State Government and to provide services that are local in character (Alao et al, 2015; Osaghae, 1990:84). Decentralization means the transfer of political, administrative and fiscal authority from the Central Government to sub-national authorities. Decentralization may take the form of deconcentration, devolution, delegation and privatization (Katorobo, 2004; Enemu, 1999:314). For our present purpose, we will define only decentralization by devolution. Decentralization by devolution must possess the following characteristics, that is, the authority or power that is transferred should include political, administrative and economic powers directed by Central Government, namely deconcentration. Devolution exists when it is established that the governing body of a sub-national government were democratically elected by the people resident in the sub-national area. The sub-national government must be a legal entity with power to sue and be sued and must have control over its finances. A country can only decentralize by

devolution when its sub-national government is autonomous and democratically elected and has the power to take binding decision in some policy matters (Katorobo 2004). It is on the account of the foregoing that Local Government can be properly regarded as devolution or deconcentration in arrangement (Alao et al, 2015; Enemuo, 1999:314).

In many countries of the world, the reason for the existence of Local Government includes the need to decentralize the functions of the central and State governments and promote participatory democracy at the grass-root level. It also includes the promotion of the spirit of liberty and equity, provision of effective solution for problems at the grass-root level of government and civic services. It serves as a training ground for future or emerging leaders, ensures effective and efficient management of grass-root affairs and serves as channel of communication between the State Government and the people at the grass-root (Alao et al, 2015; Ohiole and Ojo, 2014).

Relevance of Comparative Study

The relevance of a comparative study of Local Government of countries lies in the fact that the findings obtained in the study can be introduced or utilized by other States or countries to improve their Local Government system in terms of structure, functions, and operations with the necessary modifications, with a view to improving the living standard or condition of the people resident at the Local Government areas. The main focus of comparative study of Local Government systems of different countries is to measure the striking distinctions and similarities and examine the extent to which the solutions adopted in one Local Government can be applied in another. Essentially comparative study of Local Government of countries affords a country a vantage ground to evaluate its polices, strategies and programmes in order to advance the Local Government system and achieve a better living condition for its dwellers.

System of Local Government Administration in USA

The system of Local Government as found today in the United States of America (USA) has evolved from great antiquities. In the ancient times, the communities in the United State were known as Civic Republic. The government of the community in a Civic Republic was consensual or predicated on majority opinion. The citizens in a Civic Republic took part in public affairs and had common traditional belief. (Ohiole and Ojo, 2014). In the course of history, a community corporate enterprise promoted or motivated by economic interest arose. Finally, a consumer market community emerged. In the consumer market community, citizens are the consumers of public goods and services while the Government are the providers (Ohiole and Ojo, 2014).

The United States of America is a federalism of 54 States and operates both multi-tier and single-tier Local Government system. The USA is a population of diverse settlers on a vast territory. The adoption of federal system of government made it possible for USA to accommodate the divergent interests and competing rights existing within the vast province. The units of Local Governments in USA can be classified into multi-tier and single-tier. The spirit of Local Government as a tier of government in the USA federalism is to step down government at the local level and afford people at the grass-root to have a voice and participate in the affairs of government. The multi-tier are those Local Governments that exercise a wide range of governmental functions. The multi-tier includes three types of Local Governments namely: the counties, which are the main units of Local Government, municipalities which include cities, boroughs, villages and incorporated towns. Urban and rural municipalities are multi-tier Local Government units. The single-tier governments are the school districts and the special districts. The USA therefore has five types of Local Government namely: the counties, the municipalities, towns and townships, school districts and special districts (Ohiole and Ojo, 2014; Noun, 2010)

The counties are territories created by the State to function as the administrative agencies of the State. The nature and functions of the counties vary from State to State. Generally, the primary duties of the counties include the assessment and collection of taxes, maintenance of law and

order, road maintenance, appropriation of money, issuance of bonds. Counties also maintain hospitals and carry out health care services, pollution control, mass transit, industrial development, social and welfare services. It can also carry out certain optional functions that may, from time to time be assigned to it by the State.

The counties are governed by a body known as and called “board of commissioners or supervisors” and the body is democratically elected. The body is a central policy instrument in a county. The pattern of settlement in an area recognised by law is called a municipality or city. The people residing in a particular area of the county may apply to the State for the area to be recognised as a municipality or city. The area in view must satisfy certain essential standards or requirement such as population or density minimum. The required standard populations for the incorporation of a municipality vary from State to State. In most cases, a referendum is required. Once a city is incorporated, the State concerned grants them a charter which confers a legal personality to the city with the powers to elect officials, levy taxes and provide services to its residents.

Cities are general purpose units of Local Government like counties. Cities, however, essentially have greater decision-making powers and discretion than counties. Again, Cities offer a wider range of services to their residents or citizens than many counties. Municipalities/cities may operate any of these structures of government namely: A Mayor-council form, a Council-manager form, or a City-commission form. A common trend running through these three structures of city government is the existence of an elected governing body called a City Council. The City-Council has a policy making power or authority. The mark or line of division running through the three types of city structures is the manner in which the executive branch is organized (Ohiole and Ojo, 2014).

Towns/townships, like municipalities/cities are also general-purpose units of Local Governments but different from county and city government. In USA, many new towns practise direct democracy. This is a form of government exercised through town meetings. Every year, a town meeting or assembly is held in which residents or citizens of the city participate in policy decision making on matters affecting the community. The residents elect town officials, pass local ordinances, levy taxes and adopt budgets. The residents present at the town meeting exercise legislative functions and the town meeting functions as a legislative body (Ohiole and Ojo, 2014);

Special Districts: These are created to carry out projects which other Local Governments cannot or will not do. They are created to carry out specific projects that will meet the needs of particular area.

School districts: These are species of special districts. The spirit propelling the creation of school districts is that the fewer the number of people the more effective or efficient they are formed (Ohiole and Ojo, 2004).

Functions

The functions of municipalities/cities include city-sponsored festivals and city-constructed convention centres. Municipalities/cities pick up garbage and trash, sweep streets, inspect restaurants, maintain traffic signals and plant trees. Broadly speaking, the functions of Local Governments in USA include the management of schools, policing and fire protection, public works, libraries and recreation, public utilities, city planning, public health, airport, harbour and housing (Alao et al, 2015).

Despite the fact that Local Governments in USA are under the control of the State Governments, they enjoy relative autonomy in that, they exercise a wide variety of powers. They are juristic persons that can sue and be sued in their corporate names, have sources of revenue and are

democratically structured, constituted and administered (Noun, 2010).

Sources of Revenue

The major source of revenue to Local Governments in USA is the State. About 40% of all the State expenditures are given to the Local Governments. The State grants, however, have strings attached to them. Most of the State grants to Local Governments are earmarked for public education, social welfare, road, hospitals, public safety, and public health. Thus, the Local Governments have little discretion to exercise in terms of expenditure. Cities, counties and other Local Governments have their own direct sources of income. These include property taxes, user fees, and business license fees. The Local Governments bear the burden of increasing expenditure demands from their residents/citizens. This is in the face of very limited authority/power granted by the State to Local Governments to raise fresh finances. The Local Governments oftentimes run to the State for financial assistance, thus the major source of revenue to the Local Government is the money from the State account (Alao et al, 2015).

System of Local Authorities in Britain

Britain operates a unitary system of government and shares powers between the national or Central Government and the Local Government. The British Local Government system is indigenous to its sense of administration. The Local Governments in Britain go by the conventional appellation “Local authorities”. Local authorities in Britain are creations by Acts of Parliament. It operates a multi-tier Local authority system created to serve particular needs of the people of the area. The current structure of Local Government in Britain was created by the Local Government Act of 1972. The Act which is massive provided for a new system of areas and authorities to displace the equally massive Act of 1933 which contained the general law regulating local authorities, elections, proceedings, powers, functions and finance. This Act was followed by the 1994 Local Government Act. These two Acts brought radical changes to the local authority system in Britain (Wade and Fotsyth, 2004: 111-112; Wade and Philips, 1977:358; De Smith, 1981:392). The structures of local authority in Britain are as follows: Non-Metropolitan County Councils, Metropolitan County Councils, County Councils (Wales only), Non-Metropolitan County Districts, County District Councils (Wales only), Parish governments (England), Communities (Wales). Generally, Britain operates a three-tier structure of local authorities except that in Wales the name Parish has been changed to community (Wade and Fotsyth, 2004:112; Wade and Philips, 1977:241; Noun, 2010).

The Local authorities in Britain are structured into County councils, District councils and Parish Councils. The governing body of a council is composed of accredited representatives who act for themselves and in the joint behalf of the people. The main elected offices are: Chairman, Alderman and Councillors. The Chairman is elected from the council or pool of Aldermen. His tenure in office is one year. The Aldermen are elected by the Councillors. They hold office for six years. Aldermen are elected in a ratio of 1:3 with half of the total number retiring every 3 years. The Alderman must be persons of noble character who have distinguished themselves in contributing to the development of their immediate local authority. Councillors are elected by the people. They stand elections every three years and have the right to stand further elections or to continue to be elected. The position of or office of Alderman is unique in that the arrangement about succession provides for continuity in the management of the affairs of the local authority. When the council stands dissolved at the effluxion of three years, half of the total number of the Aldermen are gone. The remaining half would remain in office for the next three years when the newly elected Aldermen would have three years to vacate office.

In the urban and rural counties, the main offices are Chairman and Councillors. The chairman is selected from the council. The chairman must be a person who holds the position of justice of the peace of the county. Councillors occupy their positions through elections conducted either yearly or every three years. Every year, 1/3 of the councillors would leave office with the dissolution of

the council unless they are re-elected. Thus, by the end of three years, the whole council would have been renewed (Noun, 2010).

Rural Parishes: A rural parish council is made up of a population of not less than 300 people. The main offices are chairman and members. The governing body of a parish council is made up of a chairman and between 5 and 21 members as may be determined by the county council. They hold office for three years when the parish council is dissolved for a new election.

County and Non-County Boroughs Councils: The governing body of this council is like the administrative council. It is composed of the Mayor, Alderman and Councillors. The mayors are elected from the councils and hold office for one year. They exercise ceremonial functions and have their remunerations fixed by the council. They appoint their deputies from among the Councillors. The Councillors stand elected for three years with the tenure of office of the 2/3 of them expiring every year. The Aldermen are elected either from the pool of Councillors or on merit, that is, upon recognition as persons so qualified. The Aldermen consists of 2/3 of the total member of the Councillors. The Aldermen holds offices for six years with half of the members retiring every three years (Noun, 2010).

Sources of Revenue

The Local authorities in Britain derive their revenue from two major sources. These are revenue derived or generated by the Local authorities themselves, and grants from Central Government. The revenue generated or raised by the Local authorities consists miscellaneous receipts such as rents, fees, transport undertaking, entertainment and charges for services. Non-domestic rates and council tax also constitute major sources of revenue to Local authorities. Rates are local taxes imposed upon occupation of land and buildings (Wale and Forsyth, 2004:117; De Smith, 1981:403). The revenues which are generated or raised by the local authorities themselves are often grossly insufficient to serve or meet the demands of their vast and many functions. The local authorities thus heavily depend upon grants from the Central Governments to execute their obligations (Wade and Forsyth, 2004:117; De Smith, 1981:403). In 2014, the National Audit Office reported that in 2013-2014, the British Central Government funded the local authorities with £36.1 billion. This, however excluded funding passed directly to schools and individuals. It should be noted that the grants made by the Central Governments to the local authorities were not without certain conditions attached including ringed fenced grants and un-ringed fenced grants (Alao et al, 2015). The heavy reliance upon Central Government for grants has remained the age-long source of weakness for Local authorities in Britain (Wade and Forsyth, 2004:117).

Functions

The main functions of Local authorities in Britain are contained in many provisions of the Local Government Act, 1972. The assignment or allocation of duties and functions in non-metropolitan areas which are composed of County councils, District councils and parishes or community councils or meetings are as follows:

County Council: Education, town and country planning and development, social services, food and drugs, roads, refuse disposal, libraries, highway, traffic, public transport, recreation, fire service.

District Council: Housing, town and country planning and development, public health and sanitary services, food and drugs, minor urban roads, refuse collection, entertainment, recreation, coast protection, local licensing.

Parish or Community Council or Meeting: Footpaths, allotments, bus shelters, recreation grounds, village greens, burial grounds, parking places for motor cycles and bicycles, car-sharing schemes, grants for bus services, taxi fare concessions, traffic calming, crime prevention (Wade

and Forsyth, 2004:115).

Generally, Local authorities in Britain perform three broad functions classified as environmental, protective and personal (Alao et al., 2015). In spite of various controls which the Central Governments exercises over them, they are allowed appreciable autonomy and democratic independence or self-government (Noun, 2010).

Comparative Analysis of Local Governments in USA and Britain

The United States of America (USA) practises a federal system of government with governmental powers shared between the Federal, State and Local Governments. The USA practises three tiers of government. The Local Government in the United States of America (USA) is the third tier of government. Britain operates a unitary system of government and a two-tier government composed of the Central (National) and Local Governments.

In the USA, the existence of Local Government is provided for in the constitution, but the Local Governments are controlled by the States. The Local Governments are governed by the laws of the States and not by the national or Federal Government laws. The State Governments exercise direct control over the counties which exist as agencies of the State to execute the laws enacted by State Parliaments. Local Government in the USA is a third tier of government. By contrast, in Britain, Local Governments are called "Local authorities" and they are created by Parliamentary Acts. The Local authorities in Britain are under the control of the central or national government. Since there exists no State or second tier of government, the local authorities therefore exist as second tier of government in Britain.

The USA and Britain both practise multi-tier system of Local Government. While USA has five types of Local Governments, Britain has three. The five types of Local Governments in USA are the counties, municipalities, town and townships, special districts and school districts. In Britain generally, non-metropolitan Local authorities are structured into County Councils, Districts Councils and Parish Councils. The metropolitan councils are structured into two tiers namely, the metropolitan county councils and metropolitan council districts.

A striking and distinguishing feature of British Local Authorities are the Mayor (Chairman) or the Lord Mayor (in London), the Councillors and the Alderman. Britain operates a strong Mayor system while in USA the Mayor system is weak. The fact that 1/3 of the Councillors retire every 3 years from the Local authorities in Britain is a strong factor that propels the Councillors to brace up to the challenges of their noble duties. The Alderman system or Alderman factor promotes meritocracy and cultivates a culture of continuity in the British Local Authority system.

One common trend or pattern that runs through the mills of the Local Government system in both the USA and Britain is the fact that the units of Local Government, however small their territorial sizes and populations, are democratically constituted or the governing bodies are representatives of the people.

The Local Government in both USA and Britain lack financial autonomy. A larger part of the revenue of the Local Governments is derived from the State in USA or the Central Government in Britain. The financial grants to the Local Governments have strings attached to them. Thus, the Local Governments have no discretion to exercise in terms of the uses to make of their financial grants. It is therefore submitted that over dependence on financial grants from other tiers of government remains the bane or weakness of the Local Governments in both USA and Britain.

Local Government System in Nigeria

In Nigeria, Local Government has been defined in Section 7(1) and (5) of the Constitution of the Federal Republic of Nigeria, 1999, as a system which shall be constituted by democratically

elected Local Government Councils which the Government of every State shall, subject to Section 8 of the Constitution, ensure their existence under a law which provides for their establishment, structure, composition, finance and functions of such councils. Section 2(2) of the Constitution provides that Nigeria shall be a federation consisting of States and a Federal Capital Territory.

The Constitution acknowledges the existence of Local Government Areas in Nigeria in Section 3(6) of the Constitution but makes them appendages to the State Government. A combined reading of Sections 3(6) and 7(1) and (5) of the Constitution show that Local Government Councils in Nigeria are a tier of government but are under the control and management of the State Governments as appendages. The functions of the Local Government Councils in Nigeria set out in the Fourth Schedule of the Constitution can only be activated when the State Governments make laws providing for the functions of Local Governments Councils.

The provisions of Section 162 (6), (7) and (8) of the Constitution contain the external source of revenue to the Local Government Councils. It provides thus:

Each State shall maintain a special account to be called “State Joint Local Government Account” into which shall be paid all allocations to the Local Government Councils of the State from the Federation Account and from the Government of the State.

Each State shall pay to Local Government councils in its area of jurisdiction such proportion of its total revenue on such terms and in such manner as may be prescribed by the National Assembly.

The amount standing to the credit of Local Government Councils of a State shall be distributed among the Local Government Councils of that State on such terms and in such manner as may be prescribed by the House of Assembly of the State.

The State Governments, rather than pay the Local Government Councils the accrued allocations constitute a body known as “Joint Allocation Account Committee” (JAAC) through which the States re-allocated the funds accruing to the Local Government Councils from the Federation Account. At the end of the re-allocation exercise, the Local Government Councils are usually left with funds barely enough to service recurrent commitments. The States also fail or neglect to pay a proportion of the total revenue to the Local Government Councils on such terms as may be determined by the National Assembly as prescribed under Section 162(7) of the Constitution. The State Governments have also taken over from the Local Government Councils, those functions that have revenue yielding potential under the cover that the Local Government Councils do not have the financial powers to exercise them.

Section 198 of the Constitution gives the State Governments the power to constitute State Independent Electoral Commission (SIEC) which shall be responsible for scheduling and conducting Local Government Council elections. The State Governments instead, prefer to use Caretaker or Transition Committees to run the councils. The Constitution fails to provide for tenure of the Local Government Councils. This has given rise to diversity of tenure in the Local Government system in Nigeria ranging from 1 to 3 years according to the pleasure of each State Government.

From the foregoing, the Local Government Councils in Nigeria are not accorded autonomy as a tier of government but are treated as appendages to the State Governments. And the Local Governments lack both administrative and fiscal autonomy.

Conclusion and Recommendations

The study examined Local Government systems in USA and Britain on comparative basis and the lessons for Nigeria. The study revealed that Local Government systems in USA and Britain enjoy relative administrative and financial autonomy, are democratically constituted and run, and are efficient in the delivery of public goods and services at the grass-root. The Local Governments, however, do not enjoy absolute fiscal autonomy. This is because they largely depend on the State Governments in USA and Central Government in Britain for their revenue.

On the converse, Local Governments in Nigeria lack administrative and financial autonomy as they are treated as appendages to State Governments. In USA and Britain, Local Government elections are more democratic than in Nigeria. It is concluded that Nigeria has a lot to learn from USA and Britain in the areas of relative administrative and financial autonomy and grass-root democratic participation.

The study recommends that:

- i. The Local Governments in USA and Britain should strive to achieve a measure of financial autonomy by looking inwards to internally generate their own revenue. This will reduce heavy dependence on the State Government in USA and Central Government in Britain for financial grants and give them elbowroom to exercise their discretion on what use to make of their resources in terms of project execution.
- ii. The States in USA and Central Government in Britain should expand the powers of the Local Governments and enlarge their revenue generation base to enable them generate revenue from other sources with revenue yielding potentials.
- iii. The State Governments in Nigeria should grant relative administrative and financial autonomy to the Local Governments and ensure that efficient delivery of goods and services, and participatory-democracy are achieved at the local units of Government.
- iv. Local Governments in Nigeria should be creative and look inwards to tap other sources to generate their own revenue.
- v. The powers under Section 198 of the Constitution of the Federal Republic of Nigeria, 1999 should be transferred to the Independent National Electoral Commission (INEC) to schedule and conduct Local Government elections. This will usher in relative credible elections and promote grass-root democracy, and excitement in governance at the grass-root.
- vi. Nigeria should emulate USA and Britain to adopt multi-tier Local Government systems. This will promote effective security, service delivery and participatory democracy at the grass-root.

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