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# Comparative Analyses Of Local Government: Case Of Afghanistan, India And Türkiye

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## ABSTRACT

This study analyses the systems of local government in Afghanistan, India and Türkiye. Despite of many efforts the local government in Afghanistan has still remained vulnerable and inefficient, India on the other hand as a country with a high population has built their local government based on the country's ancient populist structures which has proved to be very efficient. Türkiye which is a country with the experience of local government practices from the times of Ottoman Empires to the current day's republic has been able to positively improvise the local government system of the Ottoman era and make it more useful. Based on above facts this thesis studies the local government systems in terms of their concept, history, structure, public participation and local autonomy in the mentioned countries in order to find out why the local government in Afghanistan has been inefficient, why Indian local government system has proved to be very successful and how the Turkish local government system managed to be more efficient despite of having a strong centralized system of government. The findings of the research show that Afghanistan has never experienced a government that shows willingness to share their power with local authorities for this reason the country has always suffered from ineffectual local government system. While in India the authorities have been able to successfully incorporate their ancient populist structures into their legal governmental system which has proved to be very useful for the country. Türkiye is also found to have been able to build a functional local government system by changing the elitism approach of the Ottomans to the populism approach of the republicans.

**Keywords:** Local Administration, Autonomy, Authority, Power

## 1. INTRODUCTION

Özer and Akçakaya (2014) (as cited in, Kpentey, 2019, p. 172) reported that local governments, in broad sense, are governmental institutions with distinct resources, expenditures, and employees, with constitutional responsibilities and powers, and whose decision-making bodies are selected by the local people to satisfy the collective needs of the people living in a specific territory. Therefore, one can say that local government is an administrative unit of the central government that is responsible to administer the affairs of a specific territory and provide services to the people of that specific territory. It is the local government that connects the local people with the central government. The local government is responsible towards local people residing in the areas under its jurisdiction. The aim of the local government is to empower the local people and enhance their capabilities by creating an environment for their healthy growth so that the people themselves get involved in the government decision making process because making and implementation of policies in the process of which the local people are not involved cannot produce the desired results. People participation in democratic countries can help solve multi-dimensional problems. This itself takes the burden off the shoulder of the government in the local as well as the central levels. Local government within the boundaries of law gives a substantial amount of a power and authority to the local officials which they can use for the interests of the local people and area under their jurisdiction (Thapa, 2020, p. 4-7).

Local government from Wraith (1964)'s point of view is referred to locally chosen councils for whom the primary goal is to deliver or govern functions with as much autonomy as modern conditions allow (Wraith, 1964, pp. 15-16). Local government, according to Golding (1999), is the administration of local issues by the people of the same community (Golding, 1959, p. 19). Local government, according to Oyediran (1979), is the dissemination of political process on a local level, i.e., local governance with values of fairness, rights protection, and justice, all of which are regarded important to the formation of a free democratic society while Wraith and Golding's idea of the local government is based on the delivery of services by the elected representatives of the local community. Oyediran provides further and talks about the values which are essential for the modern-day local government (Oyediran, 1979, p. 171). Görmez (as cited in, Özden, 2007, p. 386) reported that local government is a political concept which is referred to a branch of government that is responsible for a particular territory and population, has a legislative

purpose and has been given power and authority within the boundaries of law of the state. The democratic values such as integrity, justice and protection of rights in the local government makes the foundation of liberal democratic society. The local government plays an important role in restricting the power of central government and giving more freedom to the citizens of the local areas. Hence, throughout the process of the modernization of the states, the decentralization has been in the center of focus by those who do not want the power to be at the hand of certain individuals controlling the whole country. Decentralization is defined by Eryilmaz (2007) as the transfer of authority from the centralized administration to regional organizations and local governments outside of the central administration (Eryilmaz, 2007, P. 103). The implementation of democracy in smaller administrative units is easier and it enables the citizens to act more democratically and influence the actions and policies of the local authorities and actively participate in the decision-making process of their countries. Accordingly, in order to promote democracy and increase efficiency of the government policies most of the scholars in the world have come to the conclusion of providing local administration with political and economic autonomy. The main obstacle against the occurrence of this idea is the will of the central governments. Wilson and Graham (as cited in, Wilson, 2000, P. 59) reported that for many reasons central governments always want to keep the whole power within their hands. This could be because of distrust between central and local authorities, usage of the resources, and etc. Keeping the whole power inside the center results in centralization of the power at the hands of certain groups which will eventually lead to sidelining of the local democracy and local participation. Therefore, most of the countries in the world have started to implement some reforms in order to improve the relationship between the central and local bureaucratic units in their countries. Solving of problems at the local level and resource deployment that was determined locally were both significant achievements. (Wilson, 2000, p. 59) illustrated that compared to the previous stricter administrative orientation, the new management orientation had the potential to improve government activity. But there are challenges underway. Firstly, Local governments may lack the capability to run local taxation system, and tax collection and new levies may pose a political challenge. Economic decentralization, especially in terms of increasing local fiscal autonomy, will certainly put poor regions at a significant disadvantage in compared to more prosperous regions from a national perspective. Secondly, the increased importance of interorganizational relations is another problem for decentralized administration. Therefore, organizations should learn to work together and complete tasks as part of one network. This requires significant internal reforms in most centralized state institutions.

## 2. LITERATURE REVIEW

Local government from Wraith's point of view is referred to locally chosen councils for whom the primary goal is to deliver or govern functions with as much autonomy as modern conditions allow (Wraith, 1964, pp. 15-16;). Local government, according to Golding, is the administration of local issues by the people of the same community (Golding, 1959, p. 19). Local government, according to Oyediran, is the dissemination of political process on a local level, i.e., local governance with values of fairness, rights protection, and justice, all of which are regarded important to the formation of a free democratic society while Wraith and Golding's idea of the local government is based on the delivery of services by the elected representatives of the local community. Oyediran provides goes further and talks about the values which are essential for the modern-day local government (Oyediran, 1979, p. 171). Görmez (as cited in, Özden, 2007, p. 386) reported that local government is a political concept which is referred to a branch of government that is responsible for a particular territory and population, has a legislative purpose, and has been given power and authority within the boundaries of the law of the state. The democratic values such as integrity, justice, and protection of rights in the local government make the foundation of a liberal democratic society. The local government plays an important role in restricting the power of the central government and giving more freedom to the citizens of the local areas. Hence, throughout the process of the modernization of the states, decentralization has been in the center of focus by those who do not want the power to be at the hand of certain individuals controlling the whole country. Decentralization is defined by Eryilmaz as the transfer of authority from the centralized administration to regional organizations and local governments outside the central administration (Eryilmaz, 2007, P. 103). The implementation of democracy in smaller administrative units is easier, and it enables the citizens to act more democratically and influence the actions and policies of the local authorities and actively participate in the decision-making process of their countries. Accordingly, in order to promote democracy and increase the efficiency of the government policies most of the scholars in the world have come to the conclusion of providing local administration with political and economic autonomy. The main obstacle against the occurrence of this idea is the will of the central governments. Wilson (2000, p. 59) reported that for many reasons central governments always want to keep the whole power within their hands. This could be because of distrust between central and local authorities, usage of the resources, etc. Keeping the complete power inside the center results in the centralization of the power at the hands of certain groups which will eventually lead to sidelining of the local democracy and local participation. Therefore, most of the countries in the world have started to implement some reforms in order to improve the relationship between the central and local bureaucratic units in their countries. Solving of problems at

the local level and resource deployment that was determined locally were both significant achievements. Wilson (2000, p. 59) illustrated that compared to the previous stricter administrative orientation, the new management orientation had the potential to improve government activity. But there are challenges underway. Firstly, Local governments may lack the capability to run local taxation systems, and tax collection and new levies may pose a political challenge. Economic decentralization, especially in terms of increasing local fiscal autonomy, will certainly put poor regions at a significant disadvantage compared to more prosperous regions from a national perspective. Secondly, the increased importance of interorganizational relations is another concern for decentralized administration. Therefore, organizations should learn to work together and complete tasks as part of one network. This requires significant internal reforms in most centralized state institutions. Other studies that comparatively examine metropolitan municipality administrations as another model of local governments are Yaman & Büyükyılmaz (2021), Yaman & Aydın (2018), Topçuoğlu & Yaman (2017), Comba and Yaman (2016), Batal (2010), Gül & Batman (2013), Eken, Köseoğlu & Tuzcuoğlu (2020) and Çelikyay (2010).

### 3. AFGHANISTAN , INDIA AND TÜRKIYE'S LOCAL GOVERNMENT SYSTEM

#### 3.1.Afganistan

Afghanistan's local government has been a point of focus for many national and international scholars especially after the establishment of modern local government system in the country. Shabnam Habib in her article *Local Government in Afghanistan: How it works and main challenges, 2013* mentions that: *modern local government system which common for western countries is in fact a new experiment in Afghanistan*. She further illustrates that: *The existence of autonomic and modern government for Afghanistan requires a system of efficient governance* (Habib, 2013, p.3). Since it is a new experiment in Afghanistan, it is facing a lot of challenges. Therefore, most the scholars have focused on the challenges in the Afghanistan local government system and provided their recommendations in order to deal with the relevant issues. Sarah Lister a research analyst in the Crisis States Research Centre concluded a working paper named as *Understanding State-Building and Local Government in Afghanistan, 2007*. The article discusses the power structures in the Afghanistan local governance system. In this paper she writes about the history of centralized form of government in Afghanistan by quoting that: *Centralized state institutions in Afghanistan have co-existed uneasily with fragmented, decentralized traditional society since attempts at state-building began there. For centuries, tribal and religious leaders created 'micro-societies' that related to central and other powers on the basis of negotiation and patronage* (Lister, 2007, p.3). Shurkin (2011) in his research paper *Subnational Government in Afghanistan, 2011* which is focused on the current problems of the local government in Afghanistan points out the problems to be the lack of performance and representation in the Afghanistan local government system. He provides some recommendations such as encouraging public participation, strengthening informal and semiofficial bodies, promoting national development programs and seeking innovative ways to measure success of the government officials in order to deal with the aforementioned challenges (Shurkin 2011, pp. 16 -17). Thier (2020) in her study *The Nature of the Afghan State: Centralization vs. Decentralization, 2020* points out the lack of accountable and inclusive government to be the main challenge ahead of peace in Afghanistan. He states that; *Afghanistan is among the most highly centralized states in the world on paper, yet among the most highly atomized in reality. This tension has shaped much of Afghan history for the last century. Most of the Afghan population has always been remote from the center, and infrastructure and institutions have been insufficient to impose high levels of control* (Thier, 2020, p. 1). In order to deal with the mentioned issues, he recommends equal devolution of power, talking about people demands, paying attention to the budgetary, and having a clear understanding of decentralization and federalism. Evans et al (2004) in their study *A guide to government in Afghanistan, 2004* focused on the Administrative, Financial structures and process of government in Afghanistan at the central as well as local level. The findings of this study show that Afghanistan's centralized government is facing the major challenge of the existence of the de facto states run by local warlords at the subnational levels. It states that; *Today, there is a widespread desire for the power of the center government to be extended to the provinces, replacing currently illegitimate de factor states run by the local regional commanders* (Evans et. al., 2004, p. 21). In response it suggests that there is a need for the implementation of strategies to promote the rule of law alongside the construction activities and measures to decrease the power and influence of local warlords at the subnational level. Douglas Saltmarshe is a senior research manager in Afghanistan Research and Evaluation Unit. He along with his collogue Abhilash Medhi in their synthesis paper; *Local Governance in Afghanistan A View from the Ground 2011*, which's objective was to examine the development of local government in Afghanistan, states that: *Development planning and budgeting at the provincial level is dysfunctional largely as a result of the highly centralized nature of these processes, which leaves provincial administrations unable to make development decisions in line with local needs*. It goes on to say that: *Coordination among provincial line ministries is difficult to achieve since budgetary flows are controlled by centralized line ministries in Kabul and local planning bodies are essentially symbolic* (Saltmarshe and Mehdi, 2011,

pp. 2-3). The research paper recommends that the management responsibility of the all levels of local government should be brought under single executive authority.

### 3.2. India

Nayak (2016) concluded that Indian local government is indeed a developed form of ancient structure of the local government in this country. As George Birdwood stated: *“India has undergone more religious and political revolutions than any other country in the world; but the village and town communities remain in full municipal vigour all over the peninsula. Scythian, Greek, Saracen, Afghan, Mongol, and Maratha have come down from its mountains, and Portuguese, Dutch, English, French and Dane up out of its seas, and set up their successive dominations in the land; but the religious trades-union villages and towns have remained as little affected by their coming and going as a rock by the rising and falling of the tide”*. Charles Metcalfe’s point of view which was reported by Nayak, (2016, p. 3) was also of the same opinion about the Indian Local Government system. He stated that, *“The village communities are little republics, having nearly everything they can want within themselves, and almost independent of any foreign relations. They seem to last where nothing else lasts. Dynasty after dynasty tumbles down; revolutions succeed to revolution; ... but the village community remains the same... This union of the village communities, each one forming a separate little State in itself, has, I conceive, contributed more than any other cause to the preservation of peoples of India, through all the revolutions and changes which they have suffered, and is in a high degree conducive to their happiness and to the enjoyment of a great portion of freedom and independence”*.

The leaders of Indian freedom movement had known about the importance of people participation in the administrative process of the governance. For that reason, they have made the village panchayats the base of democracy in Independent India. The 73<sup>rd</sup> and 74<sup>th</sup> amendments of the constitution of India has been a milestone that has helped the Indian local governance strengthen and reform. R.P. Joshi In his book *“Constitutionalisation of Panchayati Raj” published in 1998* argues that the administrations of several states have issued new laws based on the framework established in the 73<sup>rd</sup> Constitutional Amendment, preceded by implementation of reservation rules, according to a reappraisal that includes writings by academics. As a result, women and the underprivileged are filled with a level of excitement that has never been witnessed before. While some devolution may have occurred, the issue of resource scarcity remained as pervasive as always. Soumyadip Chattopadhyay an associate professor of economics at the Visva Bharati University, He illustrated that: *“The need for mayor and council, under whom serves the commissioner and municipal bodies should be empowered with all the above departmental sectors and smart city SPV should function under the municipal corporations as to ensure the democratically elected local self-government’s say in the local decision-making process”* (Pasricha and Aayush, 2019, p. 11).

### 3.3. Türkiye

Özdemir (1995), and Parla (1994) (as cited in, Karadağ And Göktolga, 2009, p. 244) reported that the strong central government model inherited from the Ottoman Empire continued to exist with its proclamation during republican era. The centralized system of local government in Türkiye is indeed the remaining’s of the ottoman empire. Scholars have different perspectives on how to describe the Turkish political system. Some scholars even say that the Turkish political system is a kind of Bonapartism. In opposition to the democratic approach, the early republican era saw the expansion of the central authority in government. According to Keleş (as cited in, Ersoy, 1992, p. 3) *“in countries where independence is new prime emphasis is laid upon the central government, since the power of the state is a condition for national unity”*. This approach was initiated in order to maintain the unity among the people of the newly independent Türkiye. The centrality of the authority had created some issues in the Turkish administrative field. Three key concepts, "administrative integrity," "centralized authority," and "decentralization," were approved at the constitutional level with this article.123 of Turkish Constitutional. This article provides the central government with a task of protecting the administrative integrity of the whole government system. By doing so it has created an opportunity for the central government to have strong control on the local entities. As Palabıyık and Kabucu (as cited in, Çakır, 1999, p. 69) points out that: *Interferences by the central government, specially imposing of resource management restrictions by the central authorities has resulted in local government incompetence and service delays, which undermine public satisfaction and trust*. Ipek Sayan, professor at the Ankara University (as cited in, Çakır, 2019, p. 69) in her book *“Türkiye’de İdari Sistem ve Örgütlenme”* shares view the traditions in administrative system of Türkiye as an obstacle on the way of the people to gain information from the central and local government authorities. She states that: *Turkish bureaucracy has a habit of keeping information about public concerns hidden and non-disclosed due to traditional reasons. As a result, availability of information has been an issue in the field local administration. Despite efforts to encourage transparent democracy and openness through newly enacted laws like the Freedom of Information Law of 2004, openness and transparency remain the exception in Türkiye’s public administration*. Therefore, Sezen (as cited in, Tan, 2018, p. 116) reported that in order to promote service delivery,

Transparency, and improve local and central government relations some decentralization reforms were implemented under New Public Management (NPM) project.

#### 4. ANALYSIS AND FINDINGS

A comparative research is a process for analyzing phenomena's and evaluating them to identify elements of difference and similarities (Miri and Shahrokh, 2019, p.25). As stated above the main intention of the comparative analysis research paper is to find out the similarities and differences between the cases in order to obtain the intended result of the research paper.

##### 4.1. Concept of the local government

Based on the study in the chapter two of this research paper, the experiment of the western style of the local government system is a new concept in Afghanistan. According to the country's constitution the local government is a branch of the central government that has limited authority to take decisions of its own. Article 136 of the Afghan constitution calls for centralized system of governance in the country. Apart from the members of the provincial council all of the local authorities are elected by the central government. Article 137 of the constitution calls for the election of the provincial members by the free and democratic elections. However, the provincial council members do not have any executive authority and the constitution calls for the advisory role of the provincial council. It is concluded that the current local government system that has been copied from the western countries hasn't proven to be beneficent due to its incompatibility with the traditions and ancient practices of the country which used to provide the local people the power to take decisions of their own.

In India meanwhile, the concept of the local government is found to be a developed form of the ancient practices. It is found that the local government in India is referred to government by democratically elected local authorities that are vested with power, authority and responsibility to practice and execute them while remaining subject to the central administration's dominance. Local government in the country is named after its ancient traditional name "Panchayats". According to the part IX and IX A of the country's constitution, Panchayats are the local government bodies in the rural areas. The study observed that India has been able to use its traditions positively. The use of the ancient populist structures such as the panchayats have not only promoted political equality in the class-based society of India, but it also helped in the development of the institutionalization and people participation.

The concept of the local government in Türkiye is inherent in the Turkish public administration since the times of the great Ottomans. According to the article 127 of the Türkiye's constitution, local government is an institution which is primary tasked to provide services to the local people in order to meet the needs of the people residing in the local areas. Special Administrative Unit (SPA) is the main organ of the local government in Türkiye. The SPA is consisted of the governor, Executive committee, and provincial council. It's worth mentioning that SPA has the relevant executive power to take decisions regarding the local affairs. It is indeed a service unit of the central government responsible for the local administration. The study found that in the process of the modernization of the structure of local government that is left to the republic from the Ottoman Empire the only local government organ that hasn't been changed are the Villages. However, it's observed that unlike the Ottoman periods when only the elites were given the authority to take relevant decisions regarding the local affairs and people were kept in sidelines, the modern local government system of the republic emphasizes more on the public engagement and participation in the local decision-making process. The headman who is traditionally called as "Mukhtars" are chosen by the people. The headman in accordance with the opinions of the local people points out the needs of the local people and reports them to the relevant authorities.

While in Afghanistan the concept of local government is to be organizations at the local areas that are under direct dominance of the central government and the elected bodies like provincial councils are left without any executive authority. On the other hand, In India and Türkiye the concept of the local governance is to be locally elected organs that are vested with the relevant authorities to take decisions on their own. Unlike, Afghanistan the two other countries developed their ancient local governance bodies as in India the local governance is called Panchayats and in Türkiye the local governance is called Special Provincial Administration..

##### 4.2. History of the local governance

According to the chapter two Afghanistan's local government history is divided into 3 periods. The medieval era. The post-independence era and the modern era. The study has found that the most important event in the medieval era for the local government in Afghanistan was the period of Amir Abdul Rahman Khan's rule 1880 to 1901. In order to protect his dominance in all over Afghanistan, the king built a strong centralized system of government. He was the founder of centralism in Afghanistan. In the post independent era Afghanistan remained strongly centralized until 1953 when the former president Daud Khan did a successful coup against kingdom of Zahir Shah and changed

the government system from monarchy to republic. The president then brought many reforms in order to regulate and decentralize the power by allowing the cities with 10.000 population to elect their mayors and provincial councils. From 1964 until 2001 Afghanistan again experienced a unitary form of government where all the power was vested in the center. In the modern era (2001-Present) Afghanistan has experienced a western style of local government. The Study illustrates that due to incompatibility of the western style of local government with the culture and traditions of the country, which hasn't proved to be very successful. It states that the only improvement was the establishment of the Independent Directorate of Local Government (IDLG) which is an independent body responsible for the management of the local government in the country.

Similarly, the history of local government in India is also divided into 3 parts. The Ancient Era, the Medieval era and Modern era. Its observed that alike Afghanistan during the medieval era India also experienced a centralized form of government which had become prominent in the country. This was because both the Muslim and Mughal who used to rule the country during the medieval age did not give particular importance to the Panchayats. All of the decisions regarding local governance were taken by the crown in the center. The British invaders were fully aware of the importance of self-government organizations at the community level during their rule in India. Therefore, they implemented some reforms and devolved some powers from centers to provinces. In the final years of their rule in the country the establishment of the provincial independence in 1937 resulted in the improvement of local administrative bodies and democratization of the panchayats. After the independence India experienced problems such as service delivery and low level of public participation in its local administrative system. Therefore, it appointed several committees such as Balvantray Mehta Committee 1957, Ashok Mehta Committee 1977, and GVK Rao task force 1985 in order to investigate the issues and provide their recommendations to the government. All of the committees had come to the conclusions of providing more power and authority to PRIs and advocate a 3-tier local government system in the country. Despite of these efforts the issues remained unsolved because the reforms didn't have constitutional support. Therefore, it forced Indian authorities to make some important amendments to the Constitutions. The 73<sup>rd</sup> and 74<sup>th</sup> amendments of the Indian have been noted to be the most important occurrences after the independence in India. The mentioned amendments paved the way for more decentralizations as well as giving the needed autonomy to the PRIs in India.

The history of local government in Türkiye is basically divided into two periods. The Ottoman Era and the Republic Era. Just like Afghanistan and India, the system of local government in the Ottoman period was heavily centralized. The ottoman empire had taken some initiatives in order to meet the needs of the local people, especially the minorities. It is found that most the current local administrative institutions of Türkiye have indeed been founded during the Ottoman empire period. The first municipality was established in year 1855. Special Provincial Administration was established in 1840 and various councils such as provincial councils, large-small council and country councils were established by the Ottoman rulers. Local government during the republican period has observed to be the same as Ottoman empires period but with a difference of giving importance to the public participation against the elite's bureaucracy of the Ottomans. The most important event was the relocation of capital to Ankara. This is found to be due to two reasons such as security and intentions to break ties with previous administration. Rural to urban migration due to modernization of agriculture system and neoliberalism economic policies such as TOKI the Housing Development Agency of Türkiye which were adopted in 1980 are the significant events of the republican era.

It is scrutinized that all of the mentioned cases experienced a centralized form of government in their early ages. In Afghanistan the Amir Abdul Rahman Khan, in India the Muslims and Moghuls and in Türkiye the Ottomans were the founders of centralism. Moreover, it was found that in India the British empire was the one establishing and promoting decentralization based on the deep understanding of the efficiency of the ancient local bodies like Panchayats in the multi class country like India. In the modern era India and Türkiye has been one step further from Afghanistan. In India many commissions had been assigned in order to evaluate the local government and provide their recommendations. In Türkiye also many efforts have been done to promote public participation and power sharing for instance the preferring people engagement over elitism in the local level. Oppositely, in Afghanistan nothing essential has been done in this regard.

### **4.3. Structure of the local governance**

Afghanistan has a centralized system of government which is divided into three parts, the executive , the legislative and the judiciary .Furthermore, the local government in Afghanistan is consisted of institutions, the province, the provincial council, the districts, the villages and the Municipalities

The province is headed by a governor who is directly elected by the president of Afghanistan. The provincial council is the only local government body whose members are chosen by the local people but their role is advisory. The districts are supervised by the district governor who are the central government representative. Furthermore,

Municipalities are noted to be the service delivery bodies in the cities. Although, the Constitution of Afghanistan asks for the mayors to be elected by the people yet due to some political reasons the central government appoints the mayors.

It is found that previously it was the ministry of interior that managed the local government affairs but in order to enhance the local government system and provide better services and cut other agencies interferences in the local government affairs the Kabul government established the Independent Directorate of Local Governance. The IDLG is an autonomous organ which administers the local government's affairs and reports to the president. The president appoints governors based on the suggestions of the IDLG.

India, on the other hand is observed to have three tier system of government. Indian government in the center is elementally divided into three branches: the executive, the legislative and the judiciary. It is noted that India has 28 states and each state is made up of three authorities: the Chairman, Council of Ministers and State Assembly. Local government in India is divided into two main branches: Municipalities and Panchayats

The municipalities are local government bodies responsible for urban population. They are divided into three categories. The Municipality Corporations, Municipal councils and Nagar panchayats.

Corporations are found to be established for areas with over one million population. Municipal councils are made for the regions with one hundred thousand populations and Nagar panchayats are municipal organs responsible for the areas with no more than twelve thousand inhabitants. It is worth mentioning that according to chapter two Municipalities are headed by municipal commissioner who are directly elected by the central government. The panchayats are local government institutions tasked with rural areas in India which are also divided into three sections. The Zilla Panchayat, Mandal Panchayat and Gram Panchayat.

At the apex it is the Zilla Panchayat or district panchayat directed by a president who is appointed by the state government. After that comes the Mandal Panchayat which is primary responsible to connect the Zilla Panchayat with Gram Panchayat. It is consisted of heads of gram panchayats, legislative assembly and parliamentarians and members of district administration or Zilla Panchayat. At the bottom level are Gram Panchayats. They are established to administer and provide services to the areas with less than 200 people. Gram Panchayats are guided by village leaders also known as Sarpanch.

Türkiye, according to its Constitution has a centralized system of administration and the Constitution divides the local government of Türkiye into three below parts. Special Provincial Administration, Municipality and Village.

Special Provincial Administration is made of the three government organs. The General Assembly of Province, The Provincial Executive Committee and The Governor.

The general assembly is the decision-making organ of the province which's members are elected by the people through elections. Provincial Executive Committee is consisted of general assembly of the province, and the governor. It performs the resolutions of the general assembly of province. It is noted that municipalities are autonomous legal organs of the government in Türkiye. Municipalities are established in regions with minimum of 5000 populations. They are headed by a mayor who is elected by the local people. Municipalities in Türkiye are consisted of two branches: Municipal council and Municipal Executive Committee

Municipal council is the decision-making body of the municipality. Villages are the smallest administrative units of public administration in Türkiye. Its noticed that Villages are given particular consideration in Türkiye's local government system. They are headed by headmen also named as Mukhtar who is elected by the villagers and are counted to be central government representatives in the village. Villages in Türkiye are made up of Mukhtars, Elderly Assembly and the village association.

The study observed that in India and Türkiye the local administrative bodies enjoy freedom while taking decisions about the issues related to the areas of their jurisdiction. In India for example the panchayat raj institutions at all level are elected democratically and has their fiscal and administrative autonomy. In Türkiye also the Special Provincial Administration is said to be an institution with complete autonomy. The provincial general assembly is the decision-making authority of the local government in the province has be provided with relevant executive authority to decide on their own. In contrast Afghanistan the local government authorities are directly elected by the central government and are observed to under direct control of the central government. They do not have administrative and financial autonomy. While in Türkiye the provincial council is the decision-making authority of the province in Afghanistan the same council is elected by the people but it only has advisory role.

While India and Türkiye both have implemented certain policies and enacted a series of laws that have proven to be efficient in tackling the relevant challenges in the field of local governments. For instance, the 73<sup>rd</sup> and 74<sup>th</sup>

amendments of the Constitution by the Indian government, and passing of the municipality law No.5302 by the government of Türkiye. However, the governments in Afghanistan has observed to have never taken minimum initiatives in order to solve the challenges their local government organs are facing.

Table 1: Local Government Comparison of Afghanistan, India and Türkiye

PARAMETERS	AFGHANISTAN	INDIA	TÜRKİYE
<b>Administrative Model</b>	Heavily Centralized	Decentralized	Centralized
<b>Authorized Organs</b>	Powerful President, Governor.	Panchayati Raj Institutes	Governor, Provincial General Assembly, Provincial Committee
<b>Election</b>	Elected by the IDLG, Independent Directorate of Local Government	Apart from the CEO and other High-level authorities of only the Zilla Panchayat, Gram and Mandal panchayats including all other authorities are elected by the local people vote.	Provincial Assembly is elected by the local vote. However, Governor is appointed by the central government and Provincial committee is consisted of locally elected and centrally appointed members.
<b>Authority</b>	Central	Local	Local and partially Central
<b>Number of Municipalities</b>	217	State per state, the quantity of municipalities varies.	1390
<b>Municipality Elections</b>	Elected by the Central government	Elected by the Local Vote	Elected by the Local Vote
<b>Municipality Service Area</b>	Narrow	Wide	Wide
<b>Local Participation</b>	Average	High	High
<b>Local Engagement and Influence</b>	Very Low	High	High

## 5.CONCLUSION

This research has done a comparative study of the local government systems in three countries namely as Afghanistan, India and Türkiye. Firstly, Local government systems of the mentioned countries have been studied based on their concept, history, structure, reforms and decentralization, local government democracy and problems and solutions of the local government issues in these countries. Secondly, a comparative analysis of the local government in the aforementioned countries are provided by scrutinizing each one of the above-mentioned issues individually in order to determine the similarities and differences between the mentioned cases on the bases of the relevant issues. In the case of Afghanistan, the concept of the local government has found to be central government institutions in the local areas that do not have their enough authority and power to act on their own. While in India the concept of the local government is built based on the ancient local level administrative practices which is named as Panchayats. India is found to have been very successful in utilizing the ancient populist local structures by regulating and providing them with the enough autonomy to act on their own. In Türkiye the concept of local government has remained from the times of Ottoman empire where the elites were authorities to carry the local government related affairs and obey the sultans however in the modern Türkiye a significant change has been brought into this idea by giving priority to the local people and removing the system of elitism. While in the course of history of local government both Afghanistan and India have experienced heavily centralized government systems while being ruled by Mughals and Muslims. The things for India however were changed as the English imperialists stepped in into the country. The British understood the importance of populist's administrative structures at the local level in India. Therefore, they put the base of the decentralization in the country by improving the panchayat system. On the other hand, in neighboring Afghanistan in order to protect his dominance the emir of that time Amir Abdul Rahman khan put the base of strong centralized government, this trend has unfortunately been continuing until now. In Türkiye meanwhile the history of local government illustrates that since the republicans got into power and the elitism was abolished and populism through public participation were promoted and improved. In order to achieve this goal, SPAs were established and they were provided with full freedom and authority to carry on their duties. The study observed that in India and Türkiye the local administrative bodies enjoy freedom while taking decisions about the issues related to the areas of their jurisdiction. In India for example the panchayat raj institutions at all level are elected democratically and has their fiscal and administrative autonomy. In Türkiye also the SPA is said to be an institution with complete autonomy. The provincial general assembly is the decision-making authority of the local government in the province has been provided with relevant executive authority to decide on their own. In contrast Afghanistan the local government authorities are directly elected by the central government and are observed to under direct control of the central government. They do not have administrative and financial autonomy. While in Türkiye the provincial council is the decision-making authority of the province in Afghanistan the same council is elected by the people but it only has advisory role which is the key difference between the two government systems. In terms of local government democracy, it has been illustrated that Afghanistan has a heavily centralized system of



government and local institutions does not have decision making authority. An interesting fact about Afghan local government democracy is that mostly in this country the local warlords act as state bureaucrats which eventually undermines the central government dominance in the local areas. Unlike Afghanistan, India has very decentralized form of government and the country has successfully amended its Constitution in order to provide the local authorities with the relevant authority to decide on their own. The 73<sup>rd</sup> and 74<sup>th</sup> amendments of the Indian Constitution are seen to be the milestones that helped the Indian local government system get the freedom it needed in order to perform their services efficiently. Türkiye on the other hand just like Afghanistan is found to have a strongly centralized system of government but unlike Afghanistan the Turkish government has brought certain reforms and issued certain laws such as 2004 and 2005 laws on the local government which gave the local government institutions with the adequate authority and power to freely take their own decisions. Fiscal autonomy is the second factor that has been investigated to examine the level local government democracy in the relevant cases. At the result of this it has been concluded that Afghanistan has heavily centralized government that controls every aspect of the local government affairs including the local government finances. The central government decides on where to use the local budget and local authorities along with the provincial councils only have advisory roles. India meanwhile has a decentralized type of local government where the local officials have sufficient fiscal authority. In Türkiye the parliament has the taxing authority and municipal councils set municipal income rates and send them to the ministries for approval. Local authorities in Türkiye specially the municipalities also have enough fiscal freedom. While India and Türkiye have observed to have alike approaches towards the issue of people participation and laws in both of these countries have provided the people with relevant rights to have a say in the bureaucratic process. In Afghanistan meanwhile the villages have not been given the required importance and at the same time the only elected local body which is provincial council has not been provided with the executive authority which resulted in extreme centralization and decreased the people engagement that had ultimately distanced the locals from the government. It is normal for every government to face challenges in their local administrative system but the efficiency of the approaches they take is factor to be focused on. Just like the rest of the countries Afghanistan, India and Türkiye have also faced several challenges. Afghanistan has always had the problems centralization of power, low level of local people participation and engagement and recently the country have faced the issue of warlord's bureaucracy on its way to implementing its local policies. India on the hand has faced the challenges of lack of digital professionalism and lack of effective coordination among the relevant agencies in the local government. Finally, the republic of Türkiye has faced the issues of strong centralism, transparency and low level of public participation. While India and Türkiye both have implemented certain policies and enacted a series of laws that have proven to be efficient in tackling the relevant challenges in the field of local governments. For instance, the 73<sup>rd</sup> and 74<sup>th</sup> amendments of the Constitution by the Indian government, and passing of the municipality law No.5302 by the government of Türkiye. However, the governments in Afghanistan have observed to have never taken minimum initiatives in order to solve the challenges their local government organs are facing. Although Afghanistan and Türkiye both have centralized forms of Administration the level of decentralization in Türkiye is found to be more than Afghanistan. The governments in the history of Afghanistan have always been greedy for the power and have never wanted to share their powers with the local authorities. Türkiye unlike Afghanistan has implemented several decentralization reforms in order to make it up to the requirements of the modern era and meet the needs of its people. The New Public Management policy by the government of Türkiye could be an example for it. In India on the other hand the 73<sup>rd</sup> and 74<sup>th</sup> amendments at the result of which the local government institutions got their Constitutional recognition and the needed authorities to make their own decisions could be mentioned as reforms that the Indian government initiated in order to bring efficiency in its local government.

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