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## Research Article

# Between Theocratic Republic and Democracy: Government Systems in Iran, the USA, and the UK

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**Abstract.** From monarchs and presidents to supreme religious leaders, the architecture of power varies—but its essence shapes the fate of nations. This study presents a comparative analysis of the government systems of the Islamic Republic of Iran, the United States of America, and the United Kingdom. It focuses specifically on the structures and functions of the executive, legislative, and judicial branches in each country. While the USA and UK represent two distinct models of democratic governance—a federal republic and a constitutional monarchy respectively—Iran’s theocratic republic offers a unique blend of religious and political authority. Through a structured examination of institutional design, constitutional principles, and practical dynamics, this research reveals both

convergences and contrasts among the three systems. The findings highlight how ideological foundations—secular liberalism in the West and Islamic jurisprudence in Iran—significantly shape institutional behavior and power distribution. The study concludes with reflections on the implications of these differences for governance, accountability, and the rule of law.

**Keywords:** Comparative Government, Executive-Legislative-Judicial Systems, Theocratic Republic, Iran-USA-UK.

## INTRODUCTION

The organization of political power lies at the heart of any nation's system of governance. How authority is distributed among the executive, legislative, and judicial branches defines not only the internal mechanics of a state but also its broader political identity and social contract. While many nations adopt structures that reflect democratic ideals, others root their systems in religious, historical, or ideological foundations that offer markedly different institutional logics. This study seeks to explore and compare three distinct models of governance—those of the Islamic Republic of Iran, the United States of America, and the United Kingdom—through the lens of their core political institutions.

The United States and the United Kingdom, despite both being long-standing democracies, represent different forms of state structure: one a federal republic with a codified constitution, the other a unitary constitutional monarchy with an uncoded constitution. In contrast, Iran's political framework, established following the 1979 Islamic Revolution, is based on a theocratic model where religious authority intersects with republican elements. At the center of Iran's government is the concept of Velayat-e Faqih (Guardianship of the Islamic Jurist), which places ultimate political power in the hands of a Supreme Leader.

This research focuses specifically on the comparative analysis of the executive, legislative, and judicial branches of government in the three countries. By examining their formal structures, legal foundations, and practical operation, the study aims to identify key similarities, major differences, and unique institutional features. The objective is not only to understand the formal distinctions between these systems but also to grasp how ideology, tradition, and constitutional design shape the balance of power and the functionality of governance in each context.

The rationale behind this comparison is grounded in the broader academic interest in comparative political systems and institutional design. In particular, the case of Iran offers a compelling contrast to the Western models of governance, raising important questions about the role of religion in state authority, the limits of democratic representation, and the nature of accountability in different political systems.

## METHODOLOGY

Research means a systematic finding and study of materials and sources in order to establish facts and reach new results (Arafat, 2024). This research adopts a qualitative comparative methodology to examine and contrast the government systems of the Islamic Republic of Iran, the United States of America, and the United

Kingdom. The study focuses on analyzing the structural and functional dynamics of the executive, legislative, and judicial branches in each system, with a particular emphasis on Iran as the core case. The qualitative approach is chosen to allow for in-depth exploration of institutional designs, legal frameworks, and ideological underpinnings that cannot be fully captured through quantitative methods.

It seeks to answer the following central questions:

1. How do the executive, legislative, and judicial branches function in Iran, the USA, and the UK?
2. In what ways do the structures and principles of Iran's government system diverge from those of Western democracies?
3. What unique institutional mechanisms distinguish the Islamic Republic of Iran?

Through these inquiries, the study aspires to enrich understanding of how contrasting ideologies and institutional designs shape the governance frameworks of modern states.

## LITERATURE REVIEW

The study of government systems in Iran, the United States, and the United Kingdom reveals their distinctive political traditions, institutional structures, and tensions between democracy and alternative forms of authority. The official designation of Iran as the "Islamic Republic of Iran" continues to provoke debate among scholars regarding its true political nature. While many political scientists classify Iran's government as a theocracy (Amuzegar, 2003), various other descriptors have been applied. These include terms such as "religious tyranny" (Behbudi, 2014), "mullocracy," "clerisy" (Chehabi, 2001), and "theocratic oligarchy" (Amuzegar, 2003). According to the Iranian Constitution, the state is defined as a unitary Islamic republic in which governmental authority is distributed among three primary branches: the executive, the legislative, and the judiciary. The definition of the Iranian political system which was structured after the 1979 Iranian Revolution has long been a matter of controversy among the political scientists. Although Iran is a self-declared Islamic Republic, scholars used or coined various terms such as democratic theocracy, oligarchic theocracy, and religious tyranny to define it. Iran has democratic institutions such as parliament and constitution, but the configuration of them does not make up a liberal democracy (Kurun, 2017). However, it is also claimed that there is broad dissatisfaction among the Iranian workers about their life standards (Rigi, 2012). There are exhaustive restrictions in banking and finance as well (Kurun, 2017). Furthermore, William Buchta's (2000) work "Who Rules Iran? The Structure of Power in the Islamic Republic" is widely regarded as one of the clearest and most penetrating explanations of Iran's political structure. The book of Nikki Keddie and Yann Richard (2006) "Modern Iran: Roots and Results of Revolution" also provides a prescient analysis of the antecedents of the revolution, the political system it engendered, and recent challenges to this system. Moreover, Fazeli (2006) traces how cultural politics have shaped Iran's governance. Consequently, these works show that Iran is neither a pure theocracy nor a full democracy, but a hybrid struggling with contradictions. The perennial conflict between ideological determinations and practical considerations continues to plague the Islamic Republic (Takeyh, 2006).

The United States presents a very different story, shaped by its federal system and strong tradition of separation of powers. Foundational analyses, such as *The American Political System* (1967) and *American Government and Politics* (1969), stress how institutions balance power among the branches of government. Fabbrini (1999) offers a historical-institutional interpretation, describing the “separated government” model as a defining feature of American democracy. Dennis and Owen (2001) study public satisfaction, finding that citizens’ trust in representative democracy depends heavily on how well parties and institutions function. Jillson (2025) provides an updated account of American political development, showing how institutional change has shaped governance over time. Similarly, Singh (2003) offers a concise introduction that places U.S. politics within a broader democratic tradition. Conlan (2017) highlights the changing dynamics of federalism, noting that power relations between states and the national government have shifted over decades. Together, these works present the U.S. system as a democracy marked by checks and balances, though challenged by partisan divides and questions of legitimacy.

The United Kingdom, in contrast, has evolved from a monarchical system into a parliamentary democracy grounded in the Westminster model. Taucar (2014) traces this evolution historically, showing how constitutional practices and traditions shaped governance. Berlinski, Dewan, and Dowding (2012) analyse the structure of British government, especially ministerial accountability. Tatham (2010) studies developments in the early 2000s, highlighting changes brought by devolution and European integration. More recently, Baldini, Bressanelli, and Massetti (2021) argue that Brexit marked a partial return to the Westminster model, while Kenny (2021) examines the political and economic challenges that followed. These perspectives show how the UK system balances continuity with adaptation, blending traditional institutions with modern reforms.

When the three countries are compared, striking contrasts appear. Iran represents a contested theocratic republic where religion and politics are inseparable. The United States demonstrates the endurance of a federal democracy with a constitutional separation of powers. The United Kingdom illustrates a parliamentary system rooted in tradition but responsive to contemporary political challenges. As Behbudi (2014) points out in a more journalistic critique, democracy can be fragile when confronted by tyranny, reminding us that each of these systems faces pressures that test their democratic claims.

Overall, the literature shows that Iran, the USA, and the UK represent different paths in balancing authority, representation, and legitimacy. Each system carries contradictions: Iran between faith and democracy, the United States between institutional ideals and political division, and the UK between tradition and reform. These insights provide the foundation for analysing how different systems of governance negotiate the tension between democratic ideals and the realities of political power. This article compares the political systems of these three countries and upholds the extra unique features of Iranian political system.

## RESULTS AND DISCUSSIONS

### Government Systems

Government systems and their features in case of Iran, the USA, and the UK are given below with Table 1:

**Table 1: Government Systems in Iran, the USA, and the UK**

FEATURES	IRAN	USA	UK
<b>System of government</b>	Theocratic republic combines religious authority (Islamic principles) with republican institutions	Federal republic democratic system based on a written constitution with separation of power	Parliamentary democracy with a constitutional monarchy - monarch is ceremonial, political power rest with parliament
<b>Source of sovereignty</b>	Ultimate authority rests with God, interpreted through the Supreme leader and Islamic jurists	Sovereignty lies with (we the people) popular sovereignty	Parliamentary sovereignty - ultimate authority lies in parliament
<b>Head of the state</b>	Supreme leader- holds religious and political authority	President elected by people	Monarch (King/Queen) Ceremonial role
<b>Head of the government</b>	President- elected, but must be approved by Guardian Council	President also head of the state	Prime minister – leader of the majority party in parliament
<b>Law system</b>	Based on Islamic sharia law + civil law	Common law + codified constitution	Common law + statutes and uncodified constitution
<b>Legislature</b>	Islamic consultative Assembly (Majles). Law subject to Guardian Council approval	Congress (House of Representatives + Senate). Fully independent	Parliament (House of Commons + House of Lords) is the sovereign law making body
<b>Judiciary</b>	Oversees by religious jurists, law must comply with Islamic principle	Independent judiciary (Supreme Court) ensures constitutionality	Independent judiciary, but bound by parliament sovereignty

<b>Election</b>	Citizens vote, but candidates are vetted by Guardian Council. Limited political pluralism	Free, competitive, multiparty elections (but power exchange mostly within two major parties)	Free, competitive, multiparty elections (mostly power exchange within two parties)
<b>Rights and freedom</b>	Limited civil liberties. Authority restricts freedom of speech, press, gender equality	Broad constitutional rights. Strong protection of civil liberties.	Strong human rights protections. Parliamentary acts and Conventions uphold freedom
<b>Separation of power</b>	Weak- Supreme leader dominates executive, legislative and judiciary oversight	Strong - clear separation of executive, legislative, and judiciary (Checks and balances)	Limited - fusion of powers between executive and legislature
<b>Political party</b>	Restricted, mostly conservative/reformist candidates vetted by Guardian Council	Strong multiparty system (mainly Democrats and Republicans dominate)	Multiparty system. Conservatives, Labour, Liberal Democrats and others
<b>Religion in politics</b>	Islam (Shia) is inseparable from state, laws must conform to sharia	Secular state, religion is separate from government (first amendment of constitution)	Largely secular, Church of England is established but politics is independent from religion

### Extra Unique Features of the Islamic Republic of Iran

The Islamic Republic of Iran exhibits a distinct blend of theocratic authority and republican institutions, resulting in a system unlike the governmental models of the United States and the United Kingdom. Below are the most prominent and unique features of Iran’s political structure:

#### Supreme Leader’s Centralized Authority

The Supreme Leader is the highest-ranking political and religious figure in Iran. He is not elected by the public and holds office indefinitely. The Supreme Leader exercises control over the military, judiciary, state broadcasting, and broad areas of domestic and foreign policy, making him the most powerful individual in the country.

#### Guardian Council’s Dual Oversight Role

Composed of twelve members—six Islamic jurists appointed by the Supreme Leader and six legal experts approved by Parliament—the Guardian Council has two major functions: vetting electoral candidates and reviewing parliamentary legislation for conformity with Islamic law and the Constitution.

### **Assembly of Experts and Leadership Supervision**

This body of Islamic scholars is elected by the people and has the constitutional mandate to appoint, supervise, and, if necessary, dismiss the Supreme Leader. Despite being elected, the scope of its independence is constrained, particularly due to the Guardian Council's role in approving candidates.

### **Dual Executive Model**

Iran maintains a dual executive structure. The President, elected for a maximum of two four-year terms, handles administrative affairs but operates under the authority of the Supreme Leader, who retains final say on matters of national strategy, defense, and foreign policy.

### **Institutional Influence of the Islamic Revolutionary Guard Corps (IRGC)**

The IRGC is a powerful parallel military and economic institution. It plays a major role in both national security and domestic politics and controls significant sectors of the Iranian economy. Its influence has no counterpart in the American or British systems.

### **Religious Vetting of Electoral Candidates**

All candidates for public office, including the presidency and Parliament, must be approved by the Guardian Council based on their loyalty to the Islamic Republic, adherence to Islamic principles, and personal conduct.

### **Integration of Sharia and Constitutional Law**

Iran's legal system is based on Islamic jurisprudence, with judges often trained as religious scholars. All laws passed by the legislature must align with Sharia principles, a feature that starkly contrasts with the secular legal systems in the UK and the USA.

### **Expediency Discernment Council of the System**

The Expediency Council serves as a high-level arbitration body designed to resolve legislative conflicts between the Parliament and the Guardian Council. It also advises the Supreme Leader on strategic matters. Its members are appointed by the Supreme Leader and include clerics, politicians, and technocrats. The Council enhances centralized decision-making and ideological consistency, with no equivalent body in Western democracies.

Iran's governmental framework integrates religious doctrine directly into state structure, granting unelected bodies profound influence over legislation, elections, and national policy. This fusion of divine authority with constitutional governance sets Iran apart from the secular democratic models of the UK and the USA. These unique features underscore the complexity of Iran's system — one that combines ideological rigidity with institutional control — and present substantial implications for comparative political studies.

## How Iran is an Islamic Republic

The Islamic Republic of Iran is a unique hybrid political system that blends elements of both a republican government and an Islamic theocracy, as codified in its 1979 Constitution. The term "Islamic Republic" reflects this dual identity—where the principle of popular sovereignty (through elections and representative institutions) operates under the ultimate authority of Islamic law (Sharia) and religious leadership. Iran's republican features include the direct election of the President, the unicameral Islamic Consultative Assembly (Parliament or Majles), and local councils, all of which allow the public to participate in governance. Citizens over 18 have voting rights, and parliamentary and presidential elections are held regularly. These institutions resemble those found in secular republics and serve legislative and executive functions. However, what makes Iran specifically an Islamic Republic is the presence of unelected religious authorities who exercise overriding power. At the apex stands the Supreme Leader, a high-ranking Shi'a cleric with sweeping authority over the military, judiciary, media, foreign policy, and key elements of domestic governance. This position is grounded in the doctrine of Velayat-e Faqih (Guardianship of the Islamic Jurist), which justifies clerical oversight over all state affairs to ensure alignment with Islamic principles. The Guardian Council, another powerful unelected body composed of clerics and jurists, vets all candidates for public office and approves or rejects legislation based on its compatibility with Islam. Similarly, the Expediency Discernment Council resolves disputes between Parliament and the Guardian Council and advises the Supreme Leader, further reinforcing religious control. In this system, Islamic law takes precedence over secular or popular will. While elected bodies exist, their decisions are subject to religious approval, ensuring that the republic operates within an Islamic ideological framework.

In final remarks, Iran is called an Islamic Republic because it combines popular electoral mechanisms with a religious supervisory structure, where democratic participation is permitted—but only within the boundaries set by Islamic doctrine and clerical authority.

## CONCLUSION

This comparative study of the government systems of Iran, the United States, and the United Kingdom reveals the diverse structural and ideological foundations on which states operate. While the USA and the UK exhibit robust democratic institutions marked by separation of powers, judicial independence, and media freedom, Iran demonstrates a theocratic governance model with significant clerical influence and limited political pluralism.

## FINDINGS

1. The USA adheres to a federal democratic system with strong institutional checks, while the UK operates a unitary parliamentary system rooted in tradition and constitutional conventions.
2. Iran's theocratic governance model blends religious authority with republican elements, resulting in a mixed system where clerical bodies exert supreme oversight.

3. Judicial independence is most prominent in the USA, moderately ensured in the UK, and weakest in Iran.
4. Parliamentary scrutiny is active and procedurally entrenched in the UK and USA but significantly constrained in Iran due to centralized power and limited opposition.
5. Civil liberties, political freedoms, and media independence are fully protected in the USA and UK but severely restricted in Iran, reflecting broader systemic differences in governance values.

### **Recommendations**

1. Comparative governance studies should be encouraged across non-Western systems like Iran to promote institutional reform if necessary based on democratic benchmarks and to learn from their system as well.
2. Iran could strengthen the independence of its judiciary and media to build greater public trust and transparency.
3. The UK and USA might draw lessons from Iran's centralized efficiency in crisis coordination, albeit without compromising democratic safeguards.
4. Researchers and policymakers should continue assessing hybrid models of governance to understand how religious authority can coexist — or conflict — with democratic norms. Future research may explore citizen satisfaction, bureaucratic efficiency, and electoral integrity in these systems to offer deeper insights.

### **Limitations**

The study is limited to institutional structures and does not deeply explore policy outcomes or performance indicators like economic stability, public trust, or international standing. It is purely qualitative in nature and relies on secondary data sources such as constitutions, scholarly analyses, and global indices. Given the nature of qualitative research, some information—especially regarding Iran—was interpreted through secondary sources that may carry biases or limitations in transparency. No field interviews or institutional surveys were conducted. Furthermore, the study focuses only on national-level governance structures, excluding local government dynamics, electoral financing, and informal power networks, which may also significantly influence overall state functioning. Lastly, and most importantly, political systems are not static. They evolve in response to changing leadership, constitutional reforms, and shifting geopolitical landscapes. As such, the functional realities of governance structures may significantly transform over time, warranting continuous scholarly observation and updated comparative analyses.

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### **Conflict of Interest Statement**

The authors declare no potential conflicts of interest with respect to the research, authorship, or publication of this article.

### **Informed Consent**

This study did not involve human participants, and therefore, informed consent was not applicable.

### **Ethical Approval**

As this research was entirely based on theoretical analysis, secondary data, and document review, no ethical approval was required in accordance with institutional guidelines.

### **Data Availability**

The data supporting the findings and conceptual insights of this study are theoretical in nature, derived exclusively from secondary literature and existing research. No primary datasets were generated or analyzed. All relevant information is contained within the article. For further queries, interested readers may contact the corresponding author.

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