
SEPARATION OF POWERS BETWEEN LEGISLATIVE AND EXECUTIVE: A COMPARATIVE ANALYSIS OF INDIA AND USA

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ABSTRACT

In a democracy, the government wields its sovereign authority on behalf of the populace through three principal functions: legislating, executing, and interpreting laws. For the effective operation of government, there must be a delineation of authorities and functions among its branches. Essentially, it signifies the division of authorities and functions between different branches of government. Aristotle was the inaugural individual to classify governmental responsibilities into deliberative, magisterial, and judicial branches. However, it was the eminent French jurist Montesquieu who formulated the concept of the division of powers in his renowned work 'Spirit of the Laws.' He asserts that one organ should not relinquish the authority of another organ. As per the provisions of the Constitution of India, legislative authority is conferred onto both houses of Parliament in accordance with Article 79, while executive powers are assigned to the President at the central level. This notion had varying ramifications across different nations. In the United States, the principles of 'separation of powers' and 'checks and balances' were instituted to safeguard rights, liberty, and equality, while preventing the misuse of authority within the governmental framework. The separation of powers and checks and balances must be implemented in every nation to ensure constitutional, political, and democratic advancement. The division of authorities in India is not absolute. Should any organ of authority be misused or fail to operate adequately, another organ may intervene in accordance with the constitution.

INTRODUCTION

The division of powers is a core tenet of democratic governance, preventing any single body or branch of government from acquiring excessive power. The division of government functions into several branches—legislative, executive, and judicial—facilitates checks and balances, so averting power abuse and protecting individual liberties. The notion, though generally recognised, manifests differently according to a nation's constitutional framework. India and the United States are two major democracies that exemplify this notion; nevertheless, their governmental systems markedly differ in the distribution and exercise of power between the legislative and executive departments. India, being a parliamentary democracy, integrates the executive and legislative functions, with the executive being answerable to the legislature. Conversely, the United States functions under a presidential system, characterised by the separation and independence of the executive and legislative branches, which facilitates a system of checks and balances that can occasionally result in disagreement or impasse. This study examines the division of powers between the legislative and executive branches of India and the United States, emphasising the principal parallels and differences in their frameworks. This examination investigates the responsibilities, functions, and interconnections of these branches within each nation, offering a comparative assessment of how the principle of separation of powers influences the political and governmental frameworks in both democracies. This analysis seeks to elucidate how the constitutional framework of each nation affects the distribution of power, accountability, and the overall efficacy of governance.¹

BACKGROUND

The separation of powers is a core principle in the structure of contemporary democratic states, designed to prevent any single branch of government from gaining excessive power and to enable each branch to regulate the authority of the others. This notion was initially expressed by Montesquieu in his publication *The Spirit of the Laws* (1748), whereby he contended that political authority ought to be segmented into several branches to avert misuse and protect individual freedoms. The implementation of the separation of powers principle, however, differs among countries due to variations in their political systems and

¹ <https://www.ijlsi.com/wp-content/uploads/Separation-of-Powers-A-Comparative-Study-under-India-UK-and-USA-Constitution.pdf>

constitutional structures. A comparative analysis of the separation of powers between the legislative and executive branches in India and the United States offers a critical perspective for comprehending these distinctions.²

Historical and Constitutional Context

India, a parliamentary democracy, inherited its political and legal framework from the British colonial era, encompassing the Westminster style of governance. The Indian Constitution, enacted in 1950, established a parliamentary system in which the executive is derived from the legislative branch. The Prime Minister and the Council of Ministers are constituents of Parliament and are directly accountable to it. This framework establishes a fusion of powers, as the executive is unable to operate without the backing of the legislative, especially the lower house (Lok Sabha). The U.S. Constitution, ratified in 1787, instituted a presidential system in which the executive branch, led by the President, is independent from the legislative branch, Congress. The President is chosen autonomously from Congress, and the two branches operate independently. The separation of powers establishes a system of checks and balances, wherein each branch possesses certain rights and responsibilities, and the executive may only be ousted by Congress through impeachment, a notably arduous and infrequent procedure.

Differences in the Separation of Powers

India functions under a system of collective responsibility, wherein the executive is directly accountable to the legislative. Should the government lose the confidence of the majority in the Lok Sabha, it is obligated to resign. The United States, however, functions under a fixed-term system in which the President governs independently of Congress. The President possesses veto authority over legislation, although Congress can annul those vetoes with a two-thirds majority in both chambers. This leads to increased institutional competition and a heightened focus on preserving a balance of power. In India, the Prime Minister and Cabinet are constituents of the legislature, resulting in a closer integration, but in the United States, the President and Congress are distinct entities, with no overlapping membership between the executive and legislative institutions.

² <https://doi.org/10.33545/26646021.2025.v7.i1c.446>

CONTEXT

The comparative analysis of the separation of powers between India and the United States reveals the following key distinctions:

The governmental framework of India promotes cooperation between the legislative and executive departments within its parliamentary system, whereas the United States' presidential system emphasises a division of powers, assigning specific tasks and authorities to each branch.

Executive Accountability: In India, the executive is answerable to the legislative, signifying that the government may be disbanded through a vote of no confidence. In the United States, the President is chosen autonomously and cannot be readily dismissed by the legislature, leading to increased friction and checks among the departments of government.

Policy-Making and Governance: In India, the amalgamation of authorities frequently facilitates more efficient policy-making when the administration possesses majority backing in Parliament. The U.S. system may result in deadlock when the executive and legislative branches are governed by opposing political parties.³

1. CONSTITUTIONAL FRAMEWORK⁴

- **Constitutional Framework of India**

The Constitution of India (1950) establishes a parliamentary style of governance, predominantly influenced by the British Westminster model. The principal characteristics of the Indian framework concerning the division of powers between the legislative and executive departments are:

Fusion of Powers:

In India, the executive, comprising the Prime Minister and the Council of Ministers, is derived from the legislative, specifically Parliament. This indicates that the executive is a fundamental component of the legislative, and the executive is directly accountable

³ <https://www.ijnrd.org/papers/IJNRD2311056.pdf>

⁴ <https://lawbhoomi.com/comparison-of-separation-of-powers-in-india-usa-and-uk/>

to the legislature. This amalgamation establishes a framework wherein the Prime Minister serves as the head of government, appointed from the majority party or coalition within the Lok Sabha (the lower house of Parliament). The Council of Ministers, consisting of Cabinet Ministers, Ministers of State, and Deputy Ministers, is collectively accountable to the Lok Sabha. Should the government lose the confidence of the Lok Sabha, it is compelled to resign, highlighting the interdependence of the two branches.

Role of the President:

The President of India serves as the ceremonial head of state, with a constitutional role in appointing the Prime Minister and other ministries; nevertheless, their powers are predominantly symbolic and executed upon the Cabinet's counsel. This indicates that the President's authority is limited, with actual executive power residing with the Prime Minister and the Cabinet.

Accountability:

The executive, being derived from the legislature, is answerable to it. The Prime Minister and his Cabinet must maintain the confidence of the Lok Sabha to remain in power. This establishes a direct accountability link between the two branches. Should the administration lose a vote of confidence, it is compelled to resign, and a new government may be established.

Separation of Powers:

The separation of powers in India is less pronounced than in a presidential administration. There exists a functional separation of powers between the executive and the legislative, with the former significantly reliant on the latter for legitimacy and continuity. The judiciary, as the third branch, preserves its autonomy and serves as the ultimate adjudicator of constitutional conflicts.

❖ Constitutional Framework of the United States⁵

The U.S. Constitution (1787) instituted a presidential system of governance that

⁵ <https://lawbhoomi.com/comparison-of-separation-of-powers-in-india-usa-and-uk/>

delineates a distinct separation of powers among the executive, legislative, and judicial departments. The principal characteristics of the U.S. framework concerning the division of powers between the legislative and executive branches are:

Separation of Powers:

In contrast to India's parliamentary system, the U.S. system distinctly delineates the functions of the executive and legislative branches. The President, as the leader of the executive branch, is chosen independently of Congress, which comprises the Senate and the House of Representatives. The President's authority is independent of Congressional support, and Congress can only remove the President from office via impeachment, a challenging and infrequently employed procedure.

Executive's Independence:

The President of the United States wields considerable authority over foreign policy, the military, and law enforcement, among other domains. The President functions as the commander-in-chief of the armed forces, granting considerable executive authority separate from the legislative branch. This autonomy is underscored by the stipulation that the President's term is set at four years and is not contingent upon a vote of confidence from the legislative branch.

Checks and Balances:

The division of authority between the executive and legislative branches in the U.S. is intended to establish a system of checks and balances. For instance: The President possesses the authority to veto legislation enacted by Congress; but, Congress can override this veto with a two-thirds majority in both chambers. The Senate is required to confirm essential executive appointments, such as cabinet members, judges, and ambassadors. The Senate plays a crucial role in treaty-making, necessitating a two-thirds majority to ratify treaties negotiated by the President.

Impeachment and Accountability:

The President of the United States may be impeached by the House of Representatives for "high crimes and misdemeanours," and upon impeachment, the President undergoes

a trial in the Senate. This system guarantees the executive's accountability to the legislature; however, it is a more intricate and high-stakes procedure than India's legislative approach to executive accountability.

Role of the Judiciary:

The U.S. judiciary possesses the authority of judicial review, enabling courts to invalidate legislation enacted by Congress or actions undertaken by the President if found unconstitutional. This further solidifies the division of powers and inhibits either branch from beyond its constitutional authority.

2. INSTITUTIONAL DESIGN

Institutional Design of India

India, functioning within a parliamentary system of governance, is predicated on a synthesis of powers between the executive and legislative branches. The institutional design embodies this integration, as the executive (Prime Minister and Council of Ministers) is derived from the legislature (Parliament).

Parliamentary System:

The executive branch of India is answerable to the legislature, specifically the Lok Sabha, which ensures governmental accountability through regular sessions and votes of confidence. The Council of Ministers comprises members of Parliament, predominantly from the Lok Sabha, and is led by the Prime Minister. The Prime Minister serves as the head of government and requires the backing of the majority in the Lok Sabha to maintain authority. Should the government forfeit its majority, it is obligated to resign, perhaps leading to the formation of a new administration or the conduction of elections. The President of India functions as the ceremonial head of state, although the actual executive power is vested in the Prime Minister and the Council of Ministers. The President's authority is predominantly executed upon the counsel of the Prime Minister, rendering the President's function largely ceremonial in

practice.⁶

Accountability and Responsibility:

The Indian executive is collectively accountable to Parliament; so, if the Prime Minister or any minister loses the confidence of the majority in the Lok Sabha, the entire Council of Ministers is obligated to resign. The legislature is pivotal in overseeing the administration, with substantial authority to sanction budgets, enact legislation, and interrogate the government via debates, committees, and motions.

The Role of the Prime Minister:

The Prime Minister is the preeminent figure in the executive branch, overseeing the government and steering the policy agenda. The Prime Minister often serves as the head of the majority party or coalition in the Lok Sabha and possesses executive authority. The Council of Ministers, designated by the Prime Minister, aids in the administration of the government.

Role of Parliament:

India's Parliament has two houses:

The Lok Sabha (House of the People) and the Rajya Sabha (Council of States). The Lok Sabha serves as the principal legislative assembly, with the dominant party constituting the executive branch. The Rajya Sabha functions as a revising chamber but possesses restricted authority over legislation. The Parliament's function in sanctioning the budget, enacting laws, and determining major policies establishes it as the principal legislative entity wielding considerable authority over the executive branch.

Judiciary: The Indian Judiciary is autonomous, and its function in judicial review enables it to intervene in instances of executive and legislative excess. It guarantees that the executive and legislative branches function within the constitutional parameters.

⁶ <https://ijlr.iledu.in/wp-content/uploads/2024/10/V4I3102.pdf>

❖ Institutional Design of the United States

Conversely, the U.S. Constitution delineates a presidential system characterised by the separation of the executive and legislative branches, ensuring a distinct separation of powers. This institutional framework establishes specific functions, authorities, and interrelations among the branches of government.

Presidential System:

In the United States, the President serves as both the head of state and the head of government, centralising executive authority in one position. The President is chosen independently from the legislature (Congress), with a fixed tenure of four years. The President possesses a direct mandate from the populace, in contrast to the Indian Prime Minister, who is elected indirectly by Parliament members. The President's authority is independent of Congressional approval and remains distinct from the legislative branch.

Checks and Balances:

The institutional framework of the United States is fundamentally based on a system of checks and balances, wherein each branch possesses the authority to restrict the powers of the others, so preventing any single branch from attaining excessive power. The Senate is required to ratify the President's selections, which encompass Cabinet members, Supreme Court Justices, and ambassadors. The President may negotiate treaties, which require ratification by a two-thirds majority in the Senate. The Supreme Court possesses the authority of judicial review, guaranteeing that both the executive and legislative branches operate within the confines of the Constitution.

Separation of Powers

The U.S. system is structured to maintain a distinct separation of powers between the executive and legislative branches. This results in a robust autonomous executive (the President), who is not reliant on the legislature for their continued existence. The President is exempt from a vote of confidence or a motion of no confidence by Congress. The President's term is established, and removal is solely possible through impeachment by the House of Representatives and subsequent conviction by the Senate.

for grave crimes and misdemeanours.⁷

- **Role of Congress**

Congress consists of two houses:

The Senate and the House of Representatives. The Senate is essential for confirming presidential nominees and ratifying treaties, whereas the House of Representatives possesses the authority to commence impeachment procedures. Congress wields substantial authority over government expenditures, encompassing the ability to sanction the budget, enact legislation, and supervise the executive branch through hearings and enquiries.

Role of the President

The President of the United States possesses significant authority on foreign policy, national defence, and executive orders. The President possesses the authority to issue executive orders and command the military; nevertheless, these powers are subject to oversight by Congress and the judiciary. The President possesses a cabinet composed of appointed officials; but, in contrast to the Indian Council of Ministers, the President's cabinet is not required to be selected from Congress and does not function as a collective entity accountable to Congress.

Judiciary:

The U.S. Judiciary operates independently and is pivotal in interpreting the Constitution. The Supreme Court possesses substantial authority to evaluate the legality of legislation enacted by Congress and acts undertaken by the President, so serving as an essential check on both the administrative and legislative institutions.

3. FUNCTIONAL DYNAMICS

United States:

The United States employs a presidential form of governance, characterised by a strict

⁷https://www.researchgate.net/publication/352180591_A_comparative_study_of_Separation_of_Powers_India_and_usa_by_jasdip_kaur_phd_research_scholar_law

separation of powers among the executive, legislative, and judicial departments. The founders of the U.S. Constitution devised this arrangement to avert the concentration of power within a single branch.

Legislature (Congress):

The United States Congress is bicameral, comprising the Senate and the House of Representatives. It possesses substantial authority, including enacting legislation, ratifying the budget, declaring war, and endorsing presidential appointments. The legislative functions autonomously from the executive and possesses the power to curtail the president's powers through measures such as impeachment and veto overrides.

Executive (President):

The executive branch is led by the President, who serves as both the head of state and the head of government. The president is chosen independently from Congress and is not a constituent of the legislature. The President possesses substantial authority, encompassing the ability to veto legislation, command the military, manage foreign affairs, and issue executive orders. The division guarantees that the president cannot directly affect the legislative procedure.

Separation of Powers:

The distinction is underscored by the exclusion of executive branch personnel, such as cabinet officials, from the legislature, and vice versa. This establishes a system of checks and balances, wherein each branch can constrain the authority of the others to uphold an equilibrium of power.

❖ India:

India, conversely, employs a parliamentary style of governance that amalgamates aspects of the separation of powers with a more cohesive relationship between the executive and legislative branches. The interaction between the two branches is more dynamic than in the United States.

Legislature (Parliament):

The Indian Parliament is bicameral, comprising the Lok Sabha (House of the People) and the Rajya Sabha (Council of States). The Indian Parliament is tasked with legislating, sanctioning the budget, and ensuring executive accountability. The executive is derived from the legislative, indicating that the Prime Minister and other ministries are members of Parliament.⁸

Executive (Prime Minister and Cabinet):

The President of India serves as the head of state, while actual executive authority resides with the Prime Minister, who functions as the head of government. The Prime Minister is selected from the majority party or coalition in the Lok Sabha and heads the Cabinet, which consists of additional ministers who are also Parliament members. The Cabinet is collectively accountable to Parliament, implying that the government may be dismissed through a vote of no confidence in the legislature.

Separation of Powers:

Although a distinction exists between the executive and legislative branches, the merger of powers in India is more evident than in the United States. The Prime Minister and the Cabinet constitute components of the legislature, so establishing a more intimate connection between the two parts. This system prioritises collaboration between the executive and legislative branches, in contrast to the U.S. system, where the branches are more delineated and frequently at odds.

United States: Presidential Influence over Congress

In the United States, the President plays a unique and pivotal role in the legislative process; yet, the division of powers establishes a system of checks and balances between the executive and legislative branches.

Independent Election:

The President is elected directly by the citizens of the United States via the Electoral

⁸ <https://www.ijnrd.org/papers/IJNRD2311056.pdf>

College system, granting the executive a mandate independent of Congress. This indicates that the President is not reliant on the legislature for election or continuity, hence fostering a distinction between the two branches.

Veto Power:

The President possesses the authority to veto legislation enacted by Congress. If the President opposes a bill, they may use their veto, returning the bill to Congress. Congress can override the veto with a two-thirds majority in both the House of Representatives and the Senate, preserving the separation of powers while permitting presidential influence over legislation.

State of the Union Address

The President yearly presents the State of the Union Address to Congress, delineating their legislative agenda, which functions as a mechanism to shape legislative priorities. Despite lacking legal enforceability, the address functions as a tool for presidential influence, providing a venue to mould public sentiment and indirectly urge Congress to endorse essential policies.

Executive Orders and Legislative Influence:

The President may issue executive orders to govern the operations of the federal government; however, such orders generally cannot supersede laws enacted by Congress.

The President can influence policy through executive orders, so influencing the legislative landscape by directing the implementation of laws, despite without explicitly enacting legislation.

Appointments and Confirmations:

The President nominates judges and other significant officials, although these nominations require Senate confirmation. The Senate possesses the power to either obstruct or endorse these selections, so indirectly shaping presidential policy through its influence over crucial office appointments.

Impeachment Power:

The House of Representatives possesses the authority to impeach the President, whereas the Senate is responsible for conducting the trial. This imposes a limitation on presidential authority, guaranteeing that the President remains subject to congressional scrutiny.

❖ India: Presidential Influence over Parliament (Congress)

In India, the President occupies a predominantly ceremonial position within the parliamentary system, wherein the Prime Minister and the Cabinet are selected from the majority party in the Lok Sabha (the lower house of Parliament).

Ceremonial Head of State:

The President of India serves as the ceremonial head of state, possessing restricted authority in the legislative process. The actual executive authority is conferred upon the Prime Minister and the Council of Ministers. The President's influence over Parliament is limited in comparison to that of the U.S. President, as the majority of executive authority resides with the Prime Minister, who is answerable to Parliament.

Assent to Legislation:

In India, the President is required to provide assent to bills approved by Parliament prior to their enactment into law. Nonetheless, this is a mere formality, and the President lacks the veto authority possessed by the U.S. President. The President may withhold assent or return a measure to Parliament for reconsideration; however, this action is infrequently executed and is typically seen as a procedural formality.

Prime Minister's Influence:

The Prime Minister, as the head of government, exerts direct influence over Parliament via their role in the legislature (as a member of the Lok Sabha) and through the Cabinet (which is constituted from Parliament). The Prime Minister and Cabinet bear collective accountability to Parliament and must sustain the confidence of the Lok Sabha majority to retain office. The President technically convenes Parliament sessions and dissolves

the Lok Sabha; however, the Prime Minister is pivotal in determining legislative objectives and advancing the government's agenda.

No Direct Veto Power:

In contrast to the U.S. President, the Indian President lacks the authority to veto legislation. When a law is approved by both houses of Parliament, the President's function is predominantly ceremonial. The President can merely postpone a law or submit it for reevaluation, although in fact, this seldom occurs unless the bill is contentious or unconstitutional.

Appointments:

The President officially appoints judges and other senior officials based on proposals from the Prime Minister and the Cabinet. The President's involvement in these appointments is predominantly ceremonial. The President's influence over significant appointments is limited, as the Prime Minister's administration predominantly directs these choices.

Impeachment:

The President may be impeached by Parliament; however, the procedure is arduous and necessitates a two-thirds majority in both chambers of Parliament. The power is seldom utilised and is intended as a safeguard against any possible abuse of authority by the President.

4. COMPARATIVE ANALYSIS OF SEPARATION OF POWERS BETWEEN LEGISLATIVE AND EXECUTIVE OF INDIA AND USA

ASPECTS	INDIA	USA
Constitutional Framework	India follows a Parliamentary System of government.	The USA follows a Presidential System of government.
Separation of Powers	While there is a separation of powers, there is a fusion between the Legislative and Executive branches.	The separation of powers is distinct and clearly defined between the branches.

Role of Executive	The Prime Minister (head of government) and Council of Ministers are part of the Legislative body (Parliament).	The President (head of state and government) is separate from the Legislature (Congress).
Election of Executive	The Prime Minister is elected indirectly by the members of Parliament. The President is elected indirectly by an electoral college.	The President is directly elected by the people of the USA.
Accountability	The Executive (Prime Minister and Cabinet) is accountable to the Legislature (Parliament) and can be removed by a vote of no confidence.	The President is directly accountable to the people, and can only be removed through impeachment (a complex legal process).
Formation of Executive	The Prime Minister is usually the leader of the majority party in the Lok Sabha (lower house of Parliament).	The President is elected independently from the Congress (Legislature), which means no overlap.
Power to Make Laws	The Cabinet (Executive) proposes bills, but Parliament (Legislature) passes them. The President has limited powers in legislation.	The President may propose legislation, but Congress (Legislature) has the final power to pass laws.
Legislative-Executive Overlap	There is significant overlap, as the executive is drawn from the legislature, creating a fusion of powers.	There is a clear separation of powers; the President and members of Congress belong to separate institutions.
Emergency Powers	In case of an emergency, the Prime Minister and Council of Ministers hold significant powers, though subject to judicial review.	The President has emergency powers, particularly in foreign affairs and national defence, but subject to checks from Congress and judiciary.
Checks and Balances	The Executive is checked by the Legislature through votes of confidence, no-confidence, and by Judiciary through judicial review.	The Executive (President) is checked by the Legislature (Congress) through impeachment and legislation, and by the Judiciary through judicial review.
Power to Dissolve Legislature	The Prime Minister can advise the President to dissolve the Lok Sabha (lower house) and call for fresh elections.	The President cannot dissolve Congress, but their term is fixed at four years. Congress has fixed terms for both chambers.
Type of Government	Parliamentary (fusion of Legislative and Executive) system where the	Presidential (clear separation) system where the Executive (President) is

	Executive is dependent on the confidence of the Legislature.	independent of the Legislature (Congress).
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CONCLUSION

A comparative investigation of the separation of powers between the legislative and executive branches in India and the USA uncovers both common principles and notable distinctions stemming from their constitutional systems and political histories. The United States adheres to a stringent separation of powers, characterised by precise delineations and strong checks and balances among the executive, legislative, and judicial departments. The President and Congress function autonomously, with procedures like veto powers, congressional overrides, and judicial scrutiny preventing any branch from becoming excessively dominant. Conversely, India employs a more adaptable, hybrid approach shaped by its colonial history and legislative framework. Although the Constitution anticipates a separation of powers, the executive (Council of Ministers led by the Prime Minister) is derived from and remains answerable to the legislative, resulting in a more integrated synthesis of authorities. The Indian court, endowed with judicial review, is essential in upholding constitutional limits. Notwithstanding these fundamental disparities, both nations utilise checks and balances to avert the concentration of power and maintain democratic administration. The American model prioritises independence and reciprocal oversight, while the Indian system harmonises isolation with practical integration, mirroring its distinct socio-political setting. Both systems ultimately exhibit resilience in upholding democratic ideals, although each confronts persistent obstacles in sustaining the careful balance among branches.

⁹<https://ssrn.com/abstract=3193479>

¹⁰<https://nliulawreview.nliu.ac.in/wp-content/uploads/2021/11/SEPARATION-OF-POWERS-A-COMPARATIVE-STUDY-OF-INDIA-USA-UK-AND-FRANCE-Article-6.pdf>

¹¹ Comparative Public Law, Shashwatu Sahu, Navonita Mallick, 1st Ed., 2024

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