

opposition criticising the policies of the majority. In addition, during this early period of the government of the Åland Islands, the members of the government were perhaps regarded more as civil servants than politically answerable ministers proper. It is only during the last two decades that such a governmental accountability has developed in the Åland Islands which was at issue in the *Memel* case above.

2. The Faroe Islands

The situation in the Faroe Islands is to a great extent similar to the one in the Åland Islands. The Home Rule Act of the Faroe Islands does not create any elaborate regulation concerning the relationship of the government of the Faroe Islands to the Legislative Assembly (the *Løgting*) of the Faroe Islands or to the Danish central government (Danish Act No. 11 of 31 March 1948). In fact, the vertical element is entirely absent from the context. As concerns the horizontal element, section 1 of the Act indicates that the Legislative Assembly is entitled to establish an executive, the government, and they shall assume the powers of Faroese Special Affairs as stated in the Act. Hence also in the Faroe Islands, it seems that legislative powers of the autonomous entity provide the basis for the executive powers of the same. This is, in fact, indicated quite clearly by section 4 of the Act, which states that the Home Government holds not only legislative but also executive powers over fields of responsibility within its purview. The Government Act of the Faroe Islands is the internal legal norm that specifies the position of the government and its governmental accountability (Faroese Act No. 103 of 26 July 1994).

Within the framework of its legislative competence, the Legislative Assembly of the Faroes may pass Acts, the entering into force of which is dependent on the assent by the Prime Minister of the Government of the Faroe Islands. The Prime Minister has normally no incentive to refuse assent, because if he or she did, the likely consequence would be a vote of no confidence in the Legislative Assembly. In case of a dispute between the central government and the Faroese authorities on whether the legislative powers were correctly utilised, the matter of dispute shall, under section 6 of the Home Rule Act, be referred to a tribunal consisting of two members appointed by the Danish Government and two appointed by the Faroese Government and three Supreme Court Judges appointed by the president of the Supreme Court, one of whom shall be designated as chairman. In case of agreement between the four members appointed by the Danish Government and the Faroese Government the matter is definitively decided. Failing this, the matter shall be decided by the three Supreme Court judges. The Danish Prime Minister may suspend the implementation of a decision which has been referred to the tribunal until the tribunal has decided the matter. The judicial procedure for

adjudicating competence disputes thus contains the possibility that the central government stays the application of the Faroese legislative decision, but the mechanism does not seem to institute any vertical dimension of governmental accountability. It also seems that the office of the High Commissioner of the Faroe Islands, which is a post of a representative of the central government created under section 15 of the Home Rule Act, does not seem to have any bearing on the issue of governmental accountability in the Faroe Islands.

In the Faroe Islands, the Prime Minister of the Faroe Islands is elected by the Legislative Assembly of the Faroe Islands on the basis of section 28 of the Government Act, after which election the Prime Minister according to section 27 appoints and distributes the governmental functions between the members of the government. The method of appointing the Prime Minister is particular, because under section 28(3), the Chairperson of the Legislative Assembly, after negotiations with the leaders of the fractions in the Assembly, submits a proposal for a new Prime Minister. The proposal is voted upon, and if a majority of the members of the Assembly reject the candidate, the proposal is defeated, but if no express rejection is at hand, the candidate for Prime Minister is accepted.⁹ Therefore, the confidence in government is assumed at the formation of the government, unless the contrary is proven. Currently, the government of the Faroe Islands consists of seven members, including the Prime Minister, although the statutory requirement is the Prime Minister and at least two members. Out of the 32 members of the Legislative Assembly, more than half, that is, 17 members, have to be in support of the government. If more than half, that is, 17 members of the Legislative Assembly, oppose the government or an individual minister, the government or the minister shall resign according to sections 29 and 30 of the Government Act. Hence the expression of governmental accountability turns on the principle of absolute majority in the Legislative Assembly, which is different in comparison with the national government, where the governmental accountability is operated under the principle of simple majority.

It seems that the party system of the Faroe Islands is home-grown, without much contact with the Danish party-system. The proportional election practised on the Faroe Islands in respect of the Legislative Assembly¹⁰ results in a multi-party basis for the Assembly and normally also in a coalition government.¹¹ Under the government, six ministries and the Prime Minister's office take care of the central administration of the Faroe Islands.

3. Northern Ireland

In comparison with the two Nordic autonomies dealt with above, the self-government of Northern Ireland has shown much less stability over time¹² and has also caused the central government of the United Kingdom to interfere in