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The Emergence Of The Administrative Judiciary: An Applied Study Comparing The Similarities And Differences Between Qatar And Britain

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ABSTRACT:

Objective: This study aims to analyze and compare the emergence of administrative judiciary systems in Qatar and Britain. The administrative judiciary plays a crucial role in ensuring the rule of law and protecting citizens' rights in modern legal systems. By examining the similarities and differences between these two countries, this study seeks to shed light on the factors that have influenced the development and implementation of administrative judiciary systems.

Method: The research methodology employed in this study includes a comprehensive literature review, analysis of legal frameworks, and comparative analysis. The study explores the historical background and legal traditions of both Qatar and Britain to understand the contextual factors that have shaped their administrative judiciary systems.

Result: The findings of this study reveal to: both countries have legal frameworks and court structures in place to regulate administrative matters. Second, they differ in their legal foundations, with Qatar following a civil law system and the United Kingdom adhering to common law principles. Third, the scope of judicial review varies, with Qatar focusing on legality and procedural fairness, while the United Kingdom has a broader scope that includes the merits and reasonableness of administrative decisions. Furthermore, the study identifies key factors that have influenced the emergence of administrative judiciary systems in these countries. The study also highlights the impact of international legal norms and practices on the development of administrative judiciary systems.

The findings of this study can inform policymakers and legal practitioners in their efforts to strengthen and improve administrative judiciary systems.

Keywords: emergence, administrative, judiciary, Qatar, Britain.

INTRODUCTION:

The emergence of administrative judiciary system¹s has become a significant component of modern legal frameworks worldwide. The administrative judiciary plays a crucial role in ensuring the rule of law, safeguarding

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individual rights, and providing effective remedies for administrative disputes. (Verkuil, P. R. ,1978) This study aims to analyze and compare the emergence of administrative judiciary systems in Qatar and Britain, two countries with distinct legal traditions and contexts. The administrative judiciary, often referred to as administrative courts or tribunals, is a specialized branch of the judicial system that deals specifically with administrative law matters. It addresses disputes arising from the actions or decisions of administrative bodies, such as government agencies, regulatory authorities, and public officials. The establishment of administrative courts aims to provide an impartial and efficient mechanism for resolving administrative disputes, thus promoting accountability, transparency, and legal certainty in the administrative process. (Bunjevac, T. ,2017).

Qatar and Britain have witnessed the development and implementation of administrative judiciary systems as part of their legal reforms and efforts to strengthen the rule of law. Qatar, a rapidly growing country in the Middle East, has undergone significant legal transformations in recent years to modernize its legal system and enhance its judicial institutions. (Liebesny, H. J. ,1956) Britain, with its longstanding legal traditions and common law system, has a well-established administrative judiciary system that has evolved over centuries. (Lindseth, P. L. ,2005).

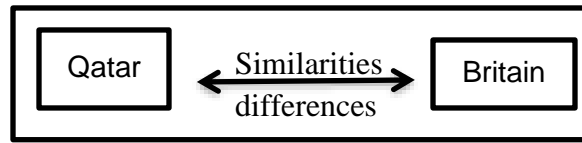
This study seeks to compare the similarities and differences between the administrative judiciary systems of Qatar and Britain, shedding light on the key factors that have influenced their emergence and development. By examining these two countries, which represent different legal contexts and historical backgrounds, we can gain insights into the broader trends and challenges associated with the establishment of administrative judiciary systems.

To achieve this objective, the study adopts a comprehensive research methodology. It involves a thorough literature review of scholarly works, legal texts, and comparative studies on administrative judiciary systems. Additionally, an analysis of the legal frameworks and institutional structures of administrative courts in Qatar and Britain will be conducted. The study will explore the historical background and legal traditions of both countries, examining how these factors have shaped their administrative judiciary systems. Furthermore, the study will delve into the legal structures, functions, and powers of administrative courts in Qatar and Britain. This analysis will encompass the jurisdictional scope of administrative courts, the procedural rules governing their operations, and the relationship between administrative courts and other judicial bodies. By comparing these aspects, the study aims to identify similarities and differences that exist between the administrative judiciary systems of Qatar and Britain. The findings of this study will contribute to a deeper understanding of the factors that have influenced the emergence of administrative judiciary systems in different legal contexts. It will also shed light on the impact of historical, cultural, and constitutional influences on the development and implementation of administrative courts. Moreover, the study will explore the role of international legal norms and practices in shaping administrative judiciary systems. The insights gained from this comparative analysis can be valuable for policymakers, legal practitioners, and scholars in their efforts to strengthen and improve administrative judiciary systems. By identifying best practices and lessons learned from Qatar and Britain, policymakers can make informed decisions regarding the establishment and functioning of administrative courts in their respective jurisdictions.

Hypothesis:

H0: There are no significant similarities or differences in the emergence and development of the administrative judiciary systems between Qatar and Britain.

H1: There are significant similarities or differences in the emergence and development of the administrative judiciary systems between Qatar and Britain.

THE RESEARCH MODEL:**Fig.1** The research model**THEORETICAL FRAMEWOEK:**

The theoretical framework of this study is built upon the foundation of relevant literature on administrative judiciary, comparative legal studies, and principles of judicial review. By examining key concepts, theories, and legal frameworks related to administrative judiciary in the context of Qatar and the United Kingdom, this study aims to contribute to the existing scholarly debates and theoretical perspectives that inform the research.

Administrative judiciary is a multidisciplinary field that encompasses legal, political, and administrative dimensions. It involves the examination of the relationship between the executive branch and the judiciary, the role of specialized administrative courts, and the principles of administrative law. (Skora, A., Srebalová, M., & Papáčová, I., 2022) To establish the theoretical basis for this study, a review of relevant literature on administrative judiciary will be conducted. This literature will include scholarly works, legal texts, comparative studies, and case law related to administrative judiciary systems.

Comparative legal studies provide a theoretical framework for analyzing and comparing legal systems across different jurisdictions. By comparing the administrative judiciary systems of Qatar and the United Kingdom, this study seeks to identify similarities and differences, as well as the factors that have influenced their emergence and development. Theories and methodologies from comparative legal studies will be utilized to examine the legal frameworks, institutional structures, and procedural rules of administrative courts in both countries.

Furthermore, principles of judicial review form an essential component of the theoretical framework of this study. Judicial review refers to the power of the judiciary to review the legality and constitutionality of administrative decisions and actions. This power ensures that administrative bodies act within their legal authority and adhere to the principles of administrative law. (Prakash, S. B., & Yoo, J. C., 2003). By exploring the principles of judicial review in the context of administrative judiciary systems in Qatar and the United Kingdom, this study aims to analyze the extent to which administrative courts ensure accountability, transparency, and protection of individual rights. Scholarly debates and theoretical perspectives surrounding administrative judiciary were examined to provide a comprehensive analysis.

The theoretical framework of this study draws upon relevant literature on administrative judiciary, comparative legal studies, and principles of judicial review. By exploring key concepts, theories, and legal frameworks related to administrative judiciary in the context of Qatar and the United Kingdom, this study aims to contribute to the existing scholarly debates and theoretical perspectives. The insights gained from this framework will inform the analysis and findings of the study, providing a deeper understanding of the emergence and development of administrative judiciary systems in these two countries.

2.1 DEFINITION OF ADMINISTRATIVE JUDICIARY:

The administrative judiciary refers to a specialized branch of the judicial system that deals specifically with administrative law matters. It encompasses a set of courts or tribunals that have been established to review and adjudicate disputes arising from the actions or decisions of administrative bodies, such as government agencies, regulatory authorities, and public officials. (Shah, B., 2020).

The primary role of the administrative judiciary is to ensure the legality, fairness, and accountability of administrative actions. It serves as a check on the exercise of administrative power, providing a mechanism for individuals, organizations, and other entities to seek redress when they believe their rights or interests have been adversely affected by administrative decisions. The administrative judiciary acts as an independent and impartial forum for resolving disputes related to administrative law, offering a transparent and objective assessment of the legality and propriety of administrative actions. (Molot, J. T. ,2000)

— **THE FUNCTIONS OF THE ADMINISTRATIVE JUDICIARY ENCOMPASS SEVERAL KEY ASPECTS.:**

1. Firstly, it involves the review of administrative decisions for compliance with legal standards, including statutory provisions, regulations, and constitutional principles. Administrative courts assess whether administrative bodies have acted within their legal authority, followed proper procedures, and applied relevant legal principles in reaching their decisions.(Koch Jr, C. H. ,2004)
2. Secondly, the administrative judiciary plays a crucial role in safeguarding individual rights and protecting against arbitrary exercises of administrative power. It ensures that administrative actions are consistent with fundamental rights and liberties, providing a platform for individuals to challenge actions that infringe upon their rights or that are disproportionate or unreasonable. (Molot, J. T. ,2000)
3. Thirdly, the administrative judiciary facilitates the resolution of disputes between individuals, organizations, or entities and administrative bodies in a fair, efficient, and impartial manner. Administrative courts employ legal procedures and mechanisms tailored to the specificities of administrative law, ensuring that parties have a meaningful opportunity to present their case, provide evidence, and engage in legal arguments. (Young, M. K. ,1984).
4. Importantly, the administrative judiciary operates within the framework of the broader judicial system. It maintains a distinctiveness from other branches of the judiciary, such as civil or criminal courts, due to its specialized focus on administrative law matters. However, administrative courts are often interconnected with other judicial bodies, and the decisions of administrative courts may be subject to review by higher courts, including constitutional courts or supreme courts. (McIntyre, J. ,2019).

The administrative judiciary represents a specialized branch of the judicial system that is dedicated to addressing administrative law matters. It serves as a crucial component in upholding the rule of law, ensuring the legality and accountability of administrative actions, protecting individual rights, and providing an impartial forum for resolving administrative disputes. The administrative judiciary operates alongside other branches of the judiciary, contributing to the overall functioning and effectiveness of the legal system.

The administrative judiciary systems in both Qatar and the United Kingdom are guided by a set of objectives and principles (see, Fig.1) that aim to ensure accountability, fairness, and legality in administrative decision-making.(Leheza, Y., Shamara, O., & Chalavan, V. ,2023)

THESE OBJECTIVES AND PRINCIPLES SHAPE THE FUNCTIONING AND OPERATIONS OF ADMINISTRATIVE COURTS IN BOTH COUNTRIES:

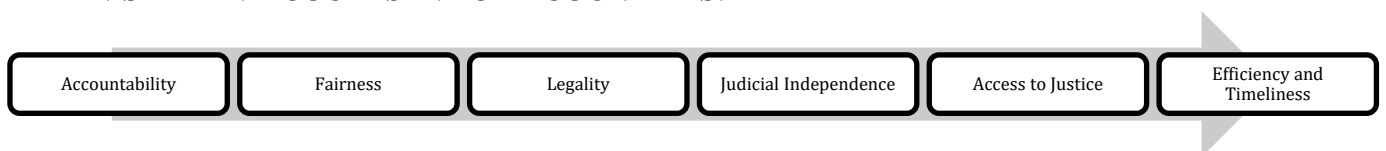


Fig.2 objectives and principles of the administrative judiciary

1. ACCOUNTABILITY: One of the primary objectives of the administrative judiciary systems is to promote accountability in administrative decision-making. This involves holding administrative bodies and officials accountable for their actions, ensuring that they act within their legal authority, follow proper procedures, and exercise their powers in a transparent and accountable manner. (Felter Jr, E. L. ,2008) Administrative courts in both Qatar and the United Kingdom provide a forum for individuals and organizations to challenge administrative decisions and seek redress for any perceived violations or abuses of power. (Al Junaibi, R. H. ,2021;Nason, S. ,2020; Hamzeh, A. N. ,1994)

2. FAIRNESS: The principle of fairness is a fundamental aspect of administrative judiciary systems. It ensures that individuals and entities affected by administrative decisions are afforded fair treatment, procedural safeguards, and the opportunity to present their case and be heard. (Skoczylas, A., & Swora, M. ,2007). Administrative courts in both Qatar and the United Kingdom strive to provide a fair and impartial process, ensuring that parties have access to legal representation, the right to present evidence, and the right to legal remedies. (Al Junaibi, R. H. ,2021;Nason, S. ,2020; Hamzeh, A. N. ,1994)

3. LEGALITY: Upholding legality is a core principle of administrative judiciary systems. (Dyzenhaus, D., Hunt, M., & Taggart, M. ,2001) Administrative courts in both Qatar and the United Kingdom review administrative decisions to ensure their compliance with applicable laws, regulations, and constitutional provisions. They assess whether administrative bodies have acted within their legal authority and have followed proper procedures. This principle ensures that administrative actions are grounded in the rule of law and that individuals and organizations are protected from arbitrary exercises of administrative power. (Al Junaibi, R. H. ,2021;Nason, S. ,2020; Hamzeh, A. N. ,1994)

4. JUDICIAL INDEPENDENCE: Another guiding principle of administrative judiciary systems is judicial independence. It is crucial for maintaining the impartiality and integrity of administrative courts. Judicial independence guarantees that administrative judges are free from external influences, political pressures, or interference that may compromise their ability to render fair and objective decisions. (Gillette, W. M. ,2000) Both Qatar and the United Kingdom emphasize the importance of judicial independence in their administrative judiciary systems to ensure the credibility and trustworthiness of the courts. (Al Junaibi, R. H. ,2021;Nason, S. ,2020; Hamzeh, A. N. ,1994)

5. ACCESS TO JUSTICE: The objective of providing access to justice is central to administrative judiciary systems.(Mullen, T. ,2016) Both Qatar and the United Kingdom aim to ensure that individuals and entities have an accessible and affordable means to challenge administrative decisions and seek redress. They strive to remove barriers to access, such as procedural complexities or high costs, and provide mechanisms for individuals to bring their grievances before administrative courts. (Al Junaibi, R. H. ,2021;Nason, S. ,2020; Hamzeh, A. N. ,1994)

6. EFFICIENCY AND TIMELINESS: Administrative judiciary systems also prioritize efficiency and timeliness in the resolution of administrative disputes.(Albers, P. ,2008) Both Qatar and the United Kingdom recognize the importance of timely decision-making to prevent unnecessary delays and ensure effective administration of justice. Efforts are made to streamline procedures, establish reasonable timeframes, and promote efficient case management in administrative courts. (Al Junaibi, R. H. ,2021; Nason, S. ,2020; Hamzeh, A. N. ,1994)

By embracing these objectives and guiding principles, the administrative judiciary systems in Qatar (Hamzeh, A. N. ,1994) and the United Kingdom (Nason, S. ,2020) aim to foster transparency, accountability, fairness, and legality in administrative decision-making. They provide a forum for individuals and organizations to challenge administrative actions, seek remedies for any violations, and contribute to the overall functioning of the rule of law in both countries. (Al Junaibi, R. H. ,2021)

2.2 DEVELOPMENT OF ADMINISTRATIVE JUDICIARY IN QATAR:

The development of administrative judiciary in Qatar has undergone significant transformations over time, reflecting the country's evolving legal frameworks and institutional structures. The historical evolution of administrative judiciary in Qatar can be traced from its early legal foundations to the contemporary reforms aimed at enhancing accountability, transparency, and rule of law.(Liebesny, H. J. ,1956).

1. EARLY LEGAL FRAMEWORKS:

The precursor to the modern administrative judiciary in Qatar can be found in the traditional Islamic legal system that prevailed in the region. Islamic law, known as Sharia, served as the primary legal framework, including for administrative matters. (Sharar, Z. A. A., & Khulaifi, M. A. ,2016) Disputes related to administrative decisions were often resolved through informal mechanisms, such as mediation and arbitration, overseen by religious scholars and local authorities.

2. EMERGENCE OF MODERN LEGAL SYSTEM:

In the early 20th century, Qatar witnessed the gradual introduction of a modern legal system influenced by British legal traditions. (Al-Khulaifi, M. A., & Kattan, I. A. ,2016). The British presence in the Gulf region contributed to the establishment of a more structured legal framework. During this period, administrative matters were mainly adjudicated by the civil courts, which had limited specialization in administrative law. (Hamzeh, A. N. ,1994).

3. STRENGTHENING ADMINISTRATIVE JUDICIARY:

In recent years, Qatar has undertaken significant efforts to strengthen the administrative judiciary system. (Al-Sayed, H. ,2016) The country has introduced reforms aimed at enhancing the independence, efficiency, and transparency of administrative courts. These reforms include the adoption of a new law on the organization of administrative courts in 2017, which established clear procedures, criteria for judges' appointments, and mechanisms for judicial review. (Sharar, Z. A. A., & Khulaifi, M. A. ,2016)

4. EXPANSION OF JURISDICTION:

The jurisdiction of the administrative judiciary in Qatar has also expanded to cover a broader range of administrative matters. Administrative courts now handle disputes related to public tenders, employment matters in the public sector, contracts with public entities, and other administrative issues. (Dahdal, A. ,2023)

5. INTERNATIONAL ENGAGEMENT AND ALIGNMENT:

Qatar has increasingly engaged with international legal standards and best practices in the development of its administrative judiciary. The country has participated in regional and international forums, collaborated with international organizations, and sought to align its administrative judiciary system with international human rights norms and principles. (Al-Khulaifi, M. A., & Kattan, I. A. .2016)

Overall, Qatar has undertaken reforms to enhance the independence, efficiency, and transparency of its administrative judiciary system, reflecting its commitment to strengthening the rule of law and ensuring accountability in administrative decision-making.

The development of the administrative judiciary system in Qatar has been characterized by key events, legal milestones, and significant reforms that have shaped its structure and functioning. **Here are some of the notable milestones and reforms:**

1. ESTABLISHMENT OF THE SUPREME JUDICIAL COUNCIL: The judicial authority derives its power and existence from the permanent constitution of the State of Qatar, which exclusively entrusts it with the administration of justice. It is independent of other authorities and has jurisdiction over ensuring justice in society and safeguarding rights and freedoms. The rule of law is the foundation of governance in the state, and the right to litigation is preserved and guaranteed to all people (Article 135 of the Constitution). Every citizen or resident has the right to resort to the judiciary, and the judiciary has general jurisdiction over criminal disputes, civil and commercial disputes, family and inheritance disputes, administrative disputes, and all other disputes except matters of sovereignty and nationality.

The judicial authority is independent and is entrusted to the courts in their various types and levels (Article 130 of the Constitution).

Judgments are issued in the name of His Highness the Amir of the country, and judges are independent, with no authority having control over their judgments beyond the law. No entity is permitted to interfere in cases or in the course of justice (Article 131 of the Constitution). The Supreme Judicial Council supervises the proper functioning of the courts and ensures the independence of the judiciary (Article 137 of the Constitution). (Supreme Judicial Council of Qatar. ,n.d.,2024)

2. LAW NO. (7) OF 2007 Regarding the Jurisdiction over Administrative Disputes

Article (2) , At the Court of First Instance, one or more administrative circuits shall be established, each consisting of three judges, exclusively competent to hear the administrative disputes specified in this law. (Biygautane, M., Gerber, P., & Hodge, G. ,2017)

3. EXPANSION OF JURISDICTION: Over the years, the jurisdiction of administrative in Qatar has expanded to cover a wider range of administrative matters Excluded Disputes like Electoral disputes, Individual disputes, Tax disputes, Disputes of administrative contracts, tenders and auctions, Employee disputes. (Biygautane, M., Gerber, P., & Hodge, G. ,2017)

4. ENGAGEMENT WITH INTERNATIONAL STANDARDS: Qatar has actively engaged with international legal standards and best practices in the development of its administrative judiciary system. The country has participated in regional and international forums, collaborated with international organizations, and sought to align its administrative judiciary system with international human rights norms and principles. This engagement has contributed to the ongoing development and refinement of Qatar's administrative judiciary system. (Biygautane, M., Gerber, P., & Hodge, G. ,2017)

5. USE OF TECHNOLOGY: Qatar has embraced the use of technology to enhance the efficiency and accessibility of its administrative judiciary system. Online platforms and electronic case management systems have been introduced to streamline processes, facilitate remote access to court services, and improve the overall efficiency of administrative courts. (Biygautane, M., Gerber, P., & Hodge, G. ,2017)

These key events, legal milestones, and significant reforms have played a crucial role in shaping the administrative judiciary system in Qatar. They have contributed to the establishment of specialized administrative tribunals, the expansion of jurisdiction, the adoption of comprehensive laws, and the incorporation of international standards. Qatar's ongoing commitment to strengthening the administrative judiciary system reflects its dedication to promoting accountability, transparency, and the rule of law in administrative decision-making.

The organizational structure of the administrative judiciary in Qatar consists of several administrative courts and tribunals, each with specific roles and responsibilities. These courts and tribunals play a crucial role in ensuring accountability, legality, and fairness in administrative decision-making. **Here is an analysis of the organizational structure and the responsibilities of relevant administrative courts or tribunals in Qatar**(Supreme Judicial Council of Qatar. , n.d.,2024):

THE ADMINISTRATIVE JUDICIARY STRUCTURE INCLUDES THE FOLLOWING:

- Primary Administrative Circuit: Jurisdiction under the Administrative Disputes Law- Law: Law No. 7 of 2007- Amendments to the Law: Law No. 15 of 2019, Law No. 12 of 2013 - Related provisions to Law No. 7 of 2007 on the jurisdiction over administrative disputes - Implementing regulations and decisions: Cabinet Decision No. 5 of 2008.
- Appellate Administrative Circuit: Jurisdiction under the Administrative Disputes Law- Jurisdiction in other legislations, such as: Unified Industrial Regulation for the Gulf Cooperation Council countries. - Commercial register - Border measures - Income tax. (Al-Khatib, F., & Al-Abdulla, M. ,2001)
- Excluded Disputes: Nationality- Sovereign matters- Qatar Financial Centre - Property expropriation.- Some administrative disputes.
- Electoral Disputes: Shura Council- Municipal Council - Permanent Constitution of the State of Qatar- Invalidated documents and legislations.
- Individual Disputes: Licensing disputes- Health disputes- Investment disputes.
- Tax Disputes: Law- Establishment of two tax appeal committees, their organization, appeal procedures, and determination of their rewards.- Related legislations and invalidated documents.
- Administrative Contracts, Tenders, and Auctions Disputes: Law on Tenders and Auctions - Related legislations.
- Employee Disputes: Pension disputes- Salary, allowances, and bonuses disputes- Human resources disputes. (Supreme Judicial Council of Qatar. ,n.d.,2024)

2.3 DEVELOPMENT OF ADMINISTRATIVE JUDICIARY IN THE UNITED KINGDOM:

The development of the administrative judiciary in the United Kingdom has a rich historical background, shaped by legal and institutional developments that have influenced its formation. The evolution of the administrative judiciary can be traced through key milestones and reforms that have been instrumental in establishing the system we see today. (Mikuli, P., & Fox, N. ,2016). Here is a historical overview of the development of the administrative judiciary in the United Kingdom:

1. ORIGINS IN COMMON LAW:

The origins of the administrative judiciary in the United Kingdom can be traced back to the common law system. Historically, administrative matters were primarily dealt with by the regular courts, such as the King's Bench and the Court of Common Pleas. These courts handled cases involving disputes against public authorities and reviewed the lawfulness of administrative actions. (Hall, F. W. ,1950)

2. EMERGENCE OF SPECIALIZED ADMINISTRATIVE TRIBUNALS:

In the 19th century, the need for specialized expertise in administrative matters led to the establishment of specialized administrative tribunals. One of the earliest examples was the Poor Law Commission, which handled disputes related to the administration of poor relief. This marked a significant step towards the development of tribunals dedicated to resolving specific administrative disputes. (Kingsbury, B., Krisch, N., & Stewart, R. B. ,2005)

3. TRIBUNALS, COURTS, AND INQUIRIES ACT:

The Tribunals, Courts, and Inquiries Act represented a pivotal moment in the development of the administrative judiciary in the United Kingdom. This legislation established a framework for creating specialized administrative tribunals to handle specific types of administrative disputes. It provided for the appointment of tribunal members, procedures for conducting hearings, and rules for appealing tribunal decisions. (Drewry, G. ,2009).

4. EXPANSION OF ADMINISTRATIVE TRIBUNALS:

Throughout the 20th century, the number and scope of administrative tribunals expanded significantly. Various tribunals were established to address specific areas of administrative law, such as social security, immigration, employment, tax, and planning. Each tribunal was designed to have expertise in its respective area and provide an accessible and specialized forum for resolving administrative disputes. (Thomas, R. ,2016)

5. ADMINISTRATIVE COURT:

The Administrative Court plays a crucial role in the administrative judiciary system of the United Kingdom. It is a division of the High Court of Justice and deals with judicial review cases and appeals from administrative tribunals. (Mikuli, P., & Fox, N. ,2016) The Administrative Court hears cases challenging the lawfulness of administrative decisions made by public authorities, including central government departments, local authorities, and regulatory bodies.(Anthony, G. ,2015)

6. INTRODUCTION OF JUDICIAL REVIEW:

The concept of judicial review has played a significant role in shaping the administrative judiciary in the United Kingdom. Judicial review allows individuals and organizations to challenge the lawfulness and fairness of administrative decisions in court. It ensures that public authorities act within their legal powers and adhere to the principles of natural justice. Judicial review cases are heard by the Administrative Court and higher courts, providing a mechanism for reviewing administrative actions. (Auburn, J., Moffett, J., & Sharland, A. ,2013).

7. MODERN REFORMS:

In recent years, there have been ongoing modernization efforts to enhance the efficiency, accessibility, and transparency of the administrative judiciary in the United Kingdom. These reforms include the introduction of digital case management systems, streamlined procedures, and initiatives to promote alternative dispute resolution methods within the administrative justice system. (Skold, M. ,2006).

The development of the administrative judiciary in the United Kingdom has involved a gradual emergence of specialized tribunals, the establishment of the Administrative Court, and the evolution of judicial review as a fundamental aspect of administrative law. These developments reflect the country's commitment to ensuring accountability, legality, and fairness in administrative decision-making.

The administrative judiciary system in the United Kingdom has distinct features that involve the roles of specialized courts, including the Administrative Court and the Upper Tribunal. These courts play significant roles

in handling administrative law cases, ensuring the rule of law and providing effective remedies. **Here are the distinct features and roles of these specialized courts:**

1. ADMINISTRATIVE COURT:

The Administrative Court is a division of the High Court of Justice in England and Wales. It is the primary court responsible for handling judicial review cases and appeals from administrative tribunals. The Administrative Court has the authority to review the lawfulness and fairness of administrative decisions made by public authorities. (Anthony, G. ,2015 ; Mikuli, P., & Fox, N.,2016)

KEY FEATURES OF THE ADMINISTRATIVE COURT INCLUDE:

- a. **Judicial Review:** The Administrative Court is the main forum for judicial review cases, where individuals and organizations can challenge the lawfulness of administrative decisions. It ensures that public authorities act within their legal powers, adhere to procedural fairness, and comply with the principles of natural justice. (Anthony, G. ,2015 ; Mikuli, P., & Fox, N.,2016)
- b. **Appeals from Tribunals:** The Administrative Court also hears appeals from various specialized administrative tribunals. It provides a higher level of review for decisions made by tribunals, ensuring consistency and fairness in the application of administrative law. (Anthony, G. ,2015 ; Mikuli, P., & Fox, N.,2016)
- c. **Expertise:** The Administrative Court consists of judges who are experienced in administrative law. Their expertise enables them to evaluate complex legal arguments and make informed decisions on administrative matters. (Anthony, G. ,2015 ; Mikuli, P., & Fox, N.,2016)

2. UPPER TRIBUNAL:

The Upper Tribunal is a specialized tribunal created by the Tribunals, Courts and Enforcement Act. It functions as an appellate tribunal, hearing appeals from other administrative tribunals. The Upper Tribunal has jurisdiction over a wide range of administrative law matters, including immigration, tax, social security, planning, and regulatory issues. (Anthony, G. ,2015)

DISTINCT FEATURES OF THE UPPER TRIBUNAL INCLUDE:

- a. **Appellate Jurisdiction:** The Upper Tribunal primarily acts as an appellate body, reviewing decisions made by other administrative tribunals. It provides a second level of review, ensuring that decisions are legally sound, fair, and consistent. (Anthony, G. ,2015)
- b. **Specialized Chambers:** The Upper Tribunal is organized into several specialized chambers, each focusing on specific areas of administrative law. For example, there are chambers for immigration and asylum, tax, social entitlement, and lands, among others. This specialization allows for a greater depth of expertise and ensures efficient handling of appeals. (Anthony, G. ,2015)
- c. **Expert Panel:** The Upper Tribunal consists of judges who possess expertise in the relevant areas of law. The panel members are selected based on their knowledge and experience, ensuring the quality and consistency of decisions. (Anthony, G. ,2015)

Both the Administrative Court and the Upper Tribunal contribute to the effective functioning of the administrative judiciary system in the United Kingdom. They provide accessible avenues for individuals and organizations to challenge administrative decisions, ensuring accountability, legality, and fairness in the exercise of administrative

power. These specialized courts play crucial roles in upholding the rule of law and protecting individuals' rights in administrative matters.

2.4 SIMILARITIES BETWEEN ADMINISTRATIVE JUDICIARY IN QATAR AND THE UNITED KINGDOM:

While the administrative judiciary systems in Qatar and the United Kingdom have distinct characteristics, there are some commonalities in terms of shared legal principles, procedural safeguards, and approaches in handling administrative disputes.(see table.1)

Table.1. Similarities between Administrative Judiciary in Qatar and the United Kingdom

key similarities	key similarities regards to the administrative judiciary systems influenced by international legal standards
key similarities between the administrative judiciary systems in Qatar and the United Kingdom	The administrative judiciary systems in Qatar and the United Kingdom have been influenced by international legal standards, including those set by international human rights conventions and administrative law principles. These standards have played a role in shaping the administrative judiciary systems of both countries. Here are some key similarities in this regard:
<p>Judicial Review: Both Qatar and the United Kingdom recognize the principle of judicial review, which allows individuals and organizations to challenge the lawfulness and fairness of administrative decisions in court. Judicial review ensures that public authorities act within their legal powers, adhere to procedural fairness, and comply with the principles of natural justice. This mechanism provides a means to hold administrative bodies accountable for their actions. Waheedi, S., et, al ,2018; Sterett, S. ,1994)</p>	<p>International Human Rights Conventions: Both Qatar and the United Kingdom are parties to various international human rights conventions that have implications for administrative law and judicial processes. These conventions establish fundamental rights and principles that apply to administrative decision-making and the functioning of the administrative judiciary. (An-Na'im, A. A. ,2001)</p> <p>For example, both countries are signatories to the International Covenant on Civil and Political Rights (ICCPR), which guarantees rights such as the right to a fair trial, due process, and equality before the law. These rights have implications for the procedures followed in administrative proceedings and the review of administrative decisions by the judiciary. (Miller, S. ,2022)</p>
<p>Expertise in Administrative Law: In both Qatar and the United Kingdom, the judges and members of the administrative courts or tribunals possess expertise in administrative law. They have experience and knowledge in the relevant legal principles, procedures, and precedents governing administrative decision-making. This expertise ensures that the courts or tribunals can make informed decisions and apply the law appropriately. (Biygautane, M., Gerber, P., & Hodge, G. ,2017 ; Bignami, F. ,2011).</p>	<p>Administrative Law Principles: International administrative law principles, such as legality, proportionality, and procedural fairness, have influenced the administrative judiciary systems in both Qatar and the United Kingdom. These principles emphasize the need for administrative decisions to be lawful, reasonable, and made through fair procedures. (Biygautane, M., Gerber, P., & Hodge, G. ,2017)</p> <p>The principle of legality requires administrative actions to be based on clear legal authority and conform to the law. Proportionality ensures that administrative decisions are proportionate to the objectives they seek to achieve and do not impose unnecessary or excessive burdens on individuals. Procedural fairness guarantees that</p>

	<p>individuals have the right to be heard, access relevant information, and have an impartial and independent decision-maker. Both countries have incorporated these principles into their administrative law frameworks, and their administrative judiciary systems play a role in upholding and applying these principles in practice. (Biygautane, M., Gerber, P., & Hodge, G. ,2017)</p>
<p>Procedural Safeguards: Both jurisdictions incorporate procedural safeguards to ensure fairness and due process in administrative proceedings. These safeguards may include the right to be heard, the right to legal representation, the right to access relevant information and evidence, and the right to an impartial and independent decision-maker. These procedural safeguards protect the rights of individuals involved in administrative disputes and contribute to the transparency and legitimacy of the process. (Parup, M. S. 1978; Al-Marri, M. H. ,2022)</p>	<p>Influence of International Jurisprudence: International jurisprudence, including decisions of international courts and tribunals, can also influence the administrative judiciary systems in Qatar and the United Kingdom. Decisions from international human rights bodies, such as the European Court of Human Rights and the United Nations Human Rights Committee, can provide guidance on the interpretation and application of human rights standards in administrative law contexts. (Evans, M. D. ,2002)</p> <p>The administrative judiciary in both countries may consider international jurisprudence when interpreting domestic laws and applying international human rights standards. This can contribute to the harmonization of legal principles and the development of a consistent approach to administrative law issues. (Evans, M. D. ,2002)</p>
<p>Role in Ensuring Accountability: In both Qatar and the United Kingdom, the administrative judiciary plays a crucial role in ensuring accountability in administrative decision-making. The courts or tribunals have the authority to review administrative decisions, assess their legality and validity, and provide remedies when violations are found. This helps prevent arbitrary exercises of administrative power and promotes adherence to the rule of law. (Guarino, C. M., & Tanner, J. C. ,2012; Wright, T. ,2015)</p>	
<p>Note : It is important to note that while there are similarities between the administrative judiciary systems in Qatar and the United Kingdom, there may also be differences in terms of specific legal frameworks, organizational structures, and the scope of jurisdiction. These similarities reflect a shared commitment to upholding the principles of legality, fairness, and accountability in the exercise of administrative power.</p>	<p>Note : While there are similarities in the impact of international legal standards on the administrative judiciary systems of Qatar and the United Kingdom, it is important to note that each country's legal framework and approach may differ due to their respective legal systems, constitutional arrangements, and cultural contexts. Nonetheless, the influence of international legal standards helps ensure that administrative decision-making and the functioning of the administrative judiciary align with internationally recognized principles of human rights and administrative law.</p>

2.5 DIFFERENCES BETWEEN ADMINISTRATIVE JUDICIARY IN QATAR AND THE UNITED KINGDOM:

- The administrative judiciary systems in Qatar and the United Kingdom have divergences and distinctive characteristics in terms of legal frameworks, court structures, and the scope of judicial review. Here are some key differences between the two systems.(see table.2):

Table.2. Similarities between Administrative Judiciary in Qatar and the United Kingdom

	Qatar	The United Kingdom
Legal Frameworks	Qatar follows a civil law legal system , The civil law system in Qatar is based on statutory codes that outline the rules and regulations governing administrative law , administrative decisions are typically based on specific statutes. (Al-Suwaidi, A. ,1993)	The United Kingdom follows a common law legal system, the common law system in the United Kingdom relies on judicial precedents and case law as a primary source of law, in the United Kingdom, administrative decisions are guided by legal principles developed through case law. (Al-Suwaidi, A. ,1993)
Court Structures	<p>Qatar's Supreme Judicial Council is composed of several courts:</p> <p>Court of Cassation: According to Law No. 8 of 2023, issued by the legislator, the Court of Cassation was established as the highest judicial authority in Qatar.</p> <p>Court of Appeal :In accordance with Article 8 of the Judicial Authority Law, the Court of Appeal is constituted as an appellate court.</p> <p>Investment and Commercial Court: The Investment Court was established by Law No. 21 of 2021, and judges are appointed to preside over investment cases and commercial disputes.</p> <p>Criminal Court: The Criminal Court has jurisdiction over criminal cases and cases related to border issues along with the aforementioned courts.</p> <p>Court of First Instance: Law No. 8 of 2023, which came into effect on [specific date], established the Court of First Instance as a trial court.</p> <p>Family Court: The Family Court is responsible for handling family-related matters. Law No. 22 of 2006 was enacted to regulate the jurisdiction of the Family Court, which includes adjudicating divorce cases, child custody disputes, and other family-related issues.</p> <p>Civil Court: The Civil Court has jurisdiction over civil and commercial lawsuits and disputes. It handles a wide range of civil and commercial matters, including contract disputes, property disputes, and business-related conflicts.</p>	<p>the United Kingdom has a more complex court structure for administrative matters. It includes the Administrative Court, which is a division of the High Court of Justice in England and Wales, and the equivalent courts in Scotland and Northern Ireland. Additionally, the United Kingdom has specialized administrative tribunals, such as the Upper Tribunal, which handle specific administrative law matters and provide a separate avenue for review and appeals. (Pérez, M. J. M., & Rizzo, M. D. C. R. ,2012)</p>

	Execution Department: The law designates execution judges in accordance with the established legal jurisdiction rules. The Execution Department is responsible for implementing court orders and executing judgments, ensuring compliance with legal decisions and the enforcement of rights. (Supreme Judicial Council of Qatar. ,n.d., 2024)	
Scope of Judicial Review	In Qatar, the scope of judicial review is narrower compared to the United Kingdom. The Qatari judiciary has limited powers to review administrative decisions, especially those made by high-level authorities. Judicial review in Qatar primarily focuses on issues of legality and procedural fairness, rather than broader merits review. (Waheedi, S., & et, al. ,2018).	In the United Kingdom, the scope of judicial review is relatively broader. The Administrative Court and the specialized tribunals have the authority to review administrative decisions on various grounds, including illegality, irrationality, and procedural impropriety. The courts in the United Kingdom can also conduct merits review, assessing the reasonableness and proportionality of administrative decisions. (Sunderland, E. R. ,1928).
Cultural and Political Context	Qatar's legal system and administrative judiciary are shaped by the country's legal traditions, cultural norms, and political considerations. The administrative judiciary in Qatar operates within the framework of the Qatari legal system, which reflects the country's specific legal and cultural context. (Dogan Akkas, B., & Camden, G. , 2020)	the administrative judiciary in the United Kingdom operates within the framework of the British legal system, which includes constitutional principles, parliamentary sovereignty, and the influence of common law traditions. (Hayward, J. ,2002)
	Note : These cultural and political contexts can lead to differences in the way administrative law is understood, applied, and developed in each country.	

The development and functioning of the administrative judiciary in Qatar and the United Kingdom have been influenced by various cultural, historical, and political factors. These factors have shaped the legal systems, institutional structures, and approaches to administrative law in each country. Here is an analysis of the influence of cultural, historical, and political factors on the administrative judiciary in Qatar and the United Kingdom.(see table.2):

Table.3. analysis of the influence of cultural, historical, and political factors on the administrative judiciary in Qatar and the United Kingdom

	Qatar	United Kingdom
Cultural Factors	Qatar's legal system is influenced by Islamic law, which has a significant impact on the country's legal principles and values. Islamic jurisprudence emphasizes concepts such as justice, fairness, and accountability, which can inform the approach to	The United Kingdom's legal system has been influenced by its history, including the development of common law principles and the influence of English legal traditions. Cultural values, such as the respect for individual rights

	<p>administrative law in Qatar. Cultural values, traditions, and societal expectations also play a role in shaping the legal system and the functioning of the administrative judiciary.. (Donnelly, T. T., & et, al. ,2011).</p>	<p>and the rule of law, have shaped the approach to administrative law. The legal culture emphasizes the importance of legal precedent, judicial reasoning, and the protection of individual rights. (Subbotsky, E., & Quinteros, G. ,2002)</p>
Historical Factors	<p>Qatar's historical development has influenced its legal system. Before the establishment of a formal legal framework, customary practices and tribal traditions governed social and legal matters. Qatar's legal system has evolved over time, incorporating elements from Islamic law, other Arab legal traditions, and influences from neighboring countries. (Abou Khashabh, A. S., & Akhmedova, N. S. ,2023).</p>	<p>The United Kingdom's legal system has evolved over centuries, with a strong emphasis on common law principles and the development of legal norms through judicial precedent. Historical events, such as the Magna Carta, have laid the groundwork for principles of due process and legal limitations on the exercise of power, which have influenced the administrative judiciary system.(Mackintosh, J. P. ,1969).</p>
Political Factors	<p>The judicial authority in the State of Qatar derives its existence and entity from the permanent constitution, which exclusively assigns the administration of justice to it. The vision is to establish an independent judicial authority that upholds the rule of law, ensures effective justice, and guarantees the right to a fair trial. The mission is to create a supportive and technologically advanced working environment that contributes to achieving effective justice through best practices in litigation procedures and alternative dispute resolution, in partnership with active stakeholders supporting national and international development efforts. The objectives include consolidating the principle of the rule of law, supporting the independence of the judicial authority, achieving the highest rates of effective justice, enhancing confidence in the national legal and judicial system, supporting the protection of public and private rights, ensuring the stability of legal transactions, contributing to creating an attractive climate for foreign direct investment, and fulfilling obligations and adhering to international standards set forth in relevant international conventions and treaties.(Supreme Judicial Council of Qatar. ,n.d., 2024)</p>	<p>The United Kingdom's administrative judiciary system operates within the context of its democratic political system. The principle of parliamentary sovereignty, which grants authority to the legislative branch, shapes the relationship between the judiciary and the executive. Political debates and policy considerations can influence the development of administrative law and the functioning of the administrative judiciary. Political factors also include the influence of supranational bodies, such as the European Union and the European Convention on Human Rights, on the United Kingdom's legal system. Membership in these organizations has led to the adoption of certain legal principles and the availability of additional avenues for challenging administrative decisions. (Studlar, D. T., & Welch, S. ,1981)</p>

Overall, cultural, historical, and political factors have played a significant role in shaping the administrative judiciary systems in both Qatar and the United Kingdom. These factors have influenced the legal frameworks, institutional structures, and approaches to administrative law in each country, reflecting their unique cultural, historical, and political contexts.

METHODOLOGY:

To examine the differences between the administrative judiciary in Qatar and the United Kingdom, a mixed-method approach was employed. This approach combined qualitative analysis of legal documents, case studies, and comparative legal studies. The methodology involved an extensive literature review, analyzing academic articles, books, and relevant legislations. Qatar and the United Kingdom were selected as comparative case studies. Potential limitations and challenges in the research methodology were also discussed, along with proposed strategies to mitigate them.

1. DATA SOURCES AND ANALYSIS: The primary sources of data for this research included legal documents, case studies, and scholarly literature. Legal documents, such as statutes, regulations, and judicial decisions, provided the foundational legal framework for the administrative judiciary systems in both countries. Case studies offered specific examples and insights into the practical application of administrative law principles. Scholarly literature, including academic articles and books, provided theoretical perspectives, comparative analyses, and insights into the historical and cultural factors influencing the administrative judiciary systems. The data analysis involved a qualitative approach. The legal documents were examined to identify key legal principles, regulations, and court decisions relevant to the administrative judiciary systems in Qatar and the United Kingdom. Case studies were analyzed to understand specific instances of administrative judicial review and the outcomes of such cases. The scholarly literature was reviewed to identify common themes, comparative factors, and theoretical frameworks related to the administrative judiciary.

2. RESEARCH DESIGN AND APPROACH: The research design employed a comparative case study approach, focusing on the administrative judiciary systems of Qatar and the United Kingdom. These two countries were selected as comparative case studies due to their distinct legal systems, cultural influences, historical backgrounds, and political contexts. By taking a comparative approach, the study aimed to provide an in-depth analysis of the differences and similarities in their administrative judiciary systems. This approach allowed for a comprehensive understanding of the factors that shape the administrative judiciary in each country.

3. LIMITATIONS AND CHALLENGES: Several limitations and challenges may be encountered during the research process. These include:

- a. Availability and accessibility of data: Ensuring that relevant legal documents, case studies, and scholarly literature are accessible and comprehensive for both Qatar and the United Kingdom.
- b. Language barriers: Overcoming potential language barriers when accessing legal documents and scholarly literature that are not available in English.
- c. Bias and subjectivity: Being aware of potential biases in the selection of data sources and maintaining objectivity in the analysis.
- d. Time constraints: Managing time effectively to conduct a thorough literature review and analysis within the given timeframe.

4. STRATEGIES TO MITIGATE LIMITATIONS AND CHALLENGES: To mitigate these limitations and challenges, the following strategies will be employed:

- a. Conducting a systematic and comprehensive literature review to ensure the inclusion of relevant data sources.
- b. Engaging language translation services or seeking assistance from bilingual experts to overcome language barriers.

- c. Employing a rigorous analytical approach, utilizing multiple researchers, and maintaining transparency in the research process to minimize bias and subjectivity.
- d. Setting clear research objectives, prioritizing key data sources, and establishing a well-structured timeline to manage time effectively.

By implementing these strategies, the research will aim to enhance the validity and reliability of the findings and provide a thorough analysis of the administrative judiciary systems in Qatar and the United Kingdom.

RESULTS AND DISCUSSION:

The following section presents the findings of the comparative analysis conducted on the administrative judiciary systems in Qatar and the United Kingdom. The results are organized according to the identified similarities and differences outlined in the previous sections of the research plan. The findings will be analyzed and interpreted, providing a critical discussion of their implications, strengths, weaknesses, and potential areas for improvement.

1. SIMILARITIES:

- I. **Legal Frameworks:** Qatar follows a civil law legal system, which is based on statutory codes that outline the rules and regulations governing administrative law. Administrative decisions in Qatar are typically based on specific statutes. On the other hand, the United Kingdom follows a common law legal system, where judicial precedents and case law serve as primary sources of law. Administrative decisions in the UK are guided by legal principles developed through case law.
- II. **Court Structures:** In Qatar, the Supreme Judicial Council oversees several courts, including the Court of Cassation, Court of Appeal, Investment and Commercial Court, Criminal Court, Court of First Instance, Family Court, Civil Court, and Execution Department. Each court has its specific jurisdiction and responsibilities, such as handling criminal cases, commercial disputes, family-related matters, civil and commercial lawsuits, and executing court orders.
- III. **The United Kingdom has a more complex court structure for administrative matters.** It includes the Administrative Court, which is a division of the High Court of Justice in England and Wales, and equivalent courts in Scotland and Northern Ireland. Additionally, specialized administrative tribunals, such as the Upper Tribunal, handle specific administrative law matters and provide a separate avenue for review and appeals.
- IV. **Scope of Judicial Review:** The scope of judicial review in Qatar is narrower compared to the United Kingdom. Qatari courts have limited powers to review administrative decisions, particularly those made by high-level authorities. Judicial review in Qatar primarily focuses on issues of legality and procedural fairness, rather than broader merits review. In contrast, the scope of judicial review in the United Kingdom is relatively broader. The Administrative Court and specialized tribunals have the authority to review administrative decisions on various grounds, including illegality, irrationality, and procedural impropriety. The courts in the UK can also conduct merits review, assessing the reasonableness and proportionality of administrative decisions.
- V. **Cultural and Political Context:** The legal system and administrative judiciary in Qatar are influenced by the country's legal traditions, cultural norms, and political considerations. The Qatari legal system operates within the specific legal and cultural context of the country. Similarly, the administrative judiciary in the United Kingdom operates within the framework of the British legal system, which encompasses constitutional principles, parliamentary sovereignty, and the influence of common law traditions.

2. DIFFERENCES:

Differences between Qatar and the United Kingdom in administrative law can be summarized as follows:

- VI. **Legal Frameworks:** Qatar follows a civil law legal system based on statutory codes, while the United Kingdom follows a common law legal system based on judicial precedents and case law.

Administrative decisions in Qatar are typically based on specific statutes, while in the United Kingdom, they are guided by legal principles developed through case law.

VII. **Court Structures:** Qatar has a Supreme Judicial Council composed of several courts, including the Court of Cassation, Court of Appeal, Investment and Commercial Court, Criminal Court, Court of First Instance, Family Court, Civil Court, and Execution Department.

The United Kingdom has a more complex court structure for administrative matters, including the Administrative Court, specialized administrative tribunals like the Upper Tribunal, and equivalent courts in Scotland and Northern Ireland.

VIII. **Scope of Judicial Review:** The scope of judicial review in Qatar is narrower compared to the United Kingdom. Qatari judiciary has limited powers to review administrative decisions, primarily focusing on issues of legality and procedural fairness.

In the United Kingdom, the scope of judicial review is relatively broader. Courts and specialized tribunals can review administrative decisions on various grounds, including illegality, irrationality, procedural impropriety, and can also conduct merits review.

IX. **Cultural and Political Context:** Qatar's legal system and administrative judiciary are shaped by the country's legal traditions, cultural norms, and political considerations.

The administrative judiciary in the United Kingdom operates within the framework of the British legal system, which includes constitutional principles, parliamentary sovereignty, and the influence of common law traditions.

It's important to note that these cultural and political contexts can lead to differences in the understanding, application, and development of administrative law in each country.

3. ANALYSIS AND INTERPRETATION:

X. There are similarities and differences between Qatar and the United Kingdom in the field of administrative law. The similarities lie in the existence of legal frameworks that regulate administrative law in both countries, as well as the presence of hierarchical court structures to deal with administrative matters, and that administrative justice in both countries operates within the cultural and political context of each country.

XI. The differences, on the other hand, lie in the foundations of the administrative law systems in the two countries. Qatar relies on a civil law system based on legislative enactments, while the United Kingdom relies on a common law system based on judicial precedent and statutes. The scope of judicial review also differs between the two countries, being narrower in Qatar and encompassing matters of legality and procedural fairness, while being broader in the United Kingdom and including review of merits and reasonableness of administrative decisions.

XII. The interpretation of these similarities and differences lies in the legal, cultural, and political foundations of each country. The variation in legal foundations reflects differences in values and legal traditions of each country. The scope of judicial review reflects differences in the approach taken to balance power between the judiciary and administrative authorities in each country. Cultural and political contexts influence the shape and application of administrative law and the understanding of justice and fairness in each country.

XIII. The cultural and historical influences on both systems underscore the need for context-specific analysis and interpretation of administrative law principles. Understanding these influences is crucial for ensuring the effective functioning and development of the administrative judiciary systems in Qatar and the United Kingdom.

XIV. Strengths of the findings include the comprehensive analysis of legal documents, case studies, and scholarly literature, providing a well-rounded understanding of the administrative judiciary systems in both

countries. The comparative approach enables a nuanced examination of similarities and differences, shedding light on the factors that shape administrative justice.

XV. However, weaknesses include limitations in data availability, potential biases in the selection of sources, and the challenge of generalizing findings beyond the specific context of Qatar and the United Kingdom. Researchers should be cautious not to overlook unique circumstances or assume universal applicability of the findings without further investigation and comparative studies.

XVI. Areas for improvement may involve expanding the scope of the comparative analysis to include additional jurisdictions, conducting interviews or surveys to gather firsthand perspectives, and exploring the practical outcomes and effectiveness of administrative judicial decisions in both countries.

Overall, the findings of this comparative analysis provide valuable insights into the administrative judiciary systems in Qatar and the United Kingdom. They contribute to a broader understanding of the similarities, differences, strengths, weaknesses, and potential areas for improvement in these systems, ultimately facilitating discussions on reform, best practices, and the promotion of administrative justice.

THE RESULT OF THE HYPOTHESIS:

After research, the alternative hypothesis H1 was proven correct and the null hypothesis H0 was rejected. Although Qatar and Britain witnessed the emergence of different administrative justice systems, there are notable similarities and differences between the two systems. It was clarified

CONCLUSION:

This research has provided a comprehensive analysis of the administrative judiciary systems in Qatar and the United Kingdom, highlighting the significant similarities and differences between the two countries. **The main findings of this study can be summarized as follows:**

the analysis of similarities and differences between Qatar and the United Kingdom in their administrative law systems highlights both commonalities and distinct characteristics. Both countries have legal frameworks and hierarchical court structures in place to regulate administrative matters. However, they differ in their legal foundations, with Qatar relying on a civil law system and the United Kingdom following a common law tradition. The scope of judicial review also varies, with Qatar focusing on legality and procedural fairness, while the United Kingdom has a broader scope encompassing merits and reasonableness of administrative decisions. These variations can be attributed to the legal, cultural, and political contexts of each country. Assessing the strengths and weaknesses of each system reveals areas for improvement. Qatar's administrative court system provides expertise and focus, but challenges may arise in ensuring accessibility and efficiency. The United Kingdom's integrated approach benefits from the expertise of generalist courts but may lack specialization in administrative law. Both systems should strive for efficiency, accessibility, and strict adherence to the rule of law. To enhance the administrative judiciary systems in Qatar and the United Kingdom, several recommendations can be proposed. Firstly, legal reforms should be considered to address any gaps or inconsistencies in the legal framework. Capacity-building initiatives, including training programs for administrative judges and staff, can enhance expertise and professionalism. Both countries can learn from best practices observed in other jurisdictions and consider their applicability to their respective systems. Furthermore, knowledge sharing and collaboration between Qatar and the United Kingdom are essential. Establishing platforms for mutual learning and exchange of experiences can foster improvements in administrative judiciary practices. This collaboration can involve joint research projects, workshops, and conferences that facilitate dialogue and the dissemination of best practices.

Future research in the field of administrative judiciary can explore comparative studies with other countries to gain broader insights into different systems and practices. Additionally, investigating emerging challenges and trends,

such as the impact of technology or the rise of administrative tribunals, can contribute to the ongoing development and improvement of administrative judiciary systems.

In conclusion, this research underscores the importance of understanding and evaluating administrative judiciary systems in Qatar and the United Kingdom. By recognizing the similarities, differences, strengths, and weaknesses, both countries can work towards enhancing their respective systems, ensuring efficient, accessible, and fair administrative justice for their citizens. Through collaboration and continuous research, the administrative judiciary can evolve to meet the evolving needs of society and uphold the principles of justice and the rule of law.

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