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KEYWORDS	ABSTRACT
Constitutionalism; Constitutional Culture; Developing Democracies; Constitutional Democracy; Rule of Law; Democratic Backsliding; State Capacity; Constitutional Resilience; Pakistan.	In the general perception, constitutionalism seems to be related to the presence of a written constitution, separation of powers, judicial review, fundamental rights and democrats of any type of government. However, the actual incorporation of these principles does not always lead to a constitutional regime that functions. In countries with less established democracy, coexistence of constitutional institutions with practices that erode accountability and the fulness of independence and value of constitutional restraint. This paper explores the arguments put forward that constitutionalism does not just consist of a text – rather, a constitutional culture that supports constitutionalizing norms in the everyday political and institutional practice seems necessary. It examines and delves into the links between constitutional design, constitutional reality, the capacity of the state, democratic consolidation and democratic backsliding. Special emphasis is placed on the discrepancy between de jure constitutional promises and de facto political actions, the significance of institutional capacity-building, the significance of political and civic orientations, and the general fragility towards gradual erosion that constitutional systems face. But the paper suggests that what should be referred to as constitutional culture is a mixture of institutional practices and values, political traditions and expectations, social attachment and civic participation. The paper outlines structural and cultural hurdles that hinder constitutional guarantees from being effective means of restricting public power, with comparisons to other developing democracies, especially Pakistan. It states that durability of constitutionalism do not only depend on good constitutional design, but also on the institutional capacity, political will and civic constitutional literacy and commitment to the constitutional norms.
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Introduction

The principle of constitutionalism is one of the cornerstones of a democratic form of government: the exercise of public power is subject to institutional and normative restrictions and has to stay within certain legal boundaries. These limitations may be in the form of separation of powers, guarantees of fundamental rights, a judicial control mechanism, accountability and procedures of the legislature. The constitution can make these limitations by separation of powers, guarantees of fundamental rights, a judicial control mechanism, accountability and proceeding guards of the legislature. However, the mere presence of such provisions does not make for a constitutionalism. The crux of the matter lies in the gulf between constitutional text and constitutional practice (Voigt, 2021). This difference forms the basis to look at the constitutionalism in developing getting democracies.

The issue is all the more pressing in formally democratic systems of government in which political institutions are subject to potential executive interference, institutional clash or poor performance. Muhammad Bilal Zafar, Hafiz Muhammad Haseeb Ulla, Abdul Rehman and Ahsan Iqbal Hashmi make a case that one should not look into constitutionalism only in the light of ability of courts to check government. They argue that constitutional actions should also have the capacity to exercise decision-making, such as administrative and institutional capacity to deliver public services efficiently, as well as implement the decisions in accordance with the constitution (Zafar et al., 2024a). Thus, constitutionalism is accompanied by the two things: One is limitation of power, and other is ability to exercise public power lawfully and effectively.

Constitutional arrangements also have to work in and out of political contexts that are evolving. According to Zim Nwokora's discussion on the design of a constitution, the aspect of time is most emphasized. Constitutions can both be in greater and greater disaffirmation with political systems they're supposed to regulate as democracy develops (Nwokora, 2022). This insight is especially timely in the context of developing democracies where constitutional institutions might be experiencing multiple and simultaneous political, institutional and social transformations. Even a fully codified constitution cannot go into effect should there be political actors that build practice around it that are inconsistent with the principle of the constitution.

It's not only a matter of the design of the constitution or the strength of institutions. It also has to do with the traditions that political actors and citizens invest in constitutional government. Cheryl Saunders's comparative study of constitutional cultures shows the strong link between culture and the setting and sustaining of constitutional democracy. Her analysis of the constitutional experiences of Asian and African States teases out the difference between constitution-making, implementation and long-term consolidation; noting the challenge of getting constitutional 'culture' to speed up and keep up with significant constitutional change (Daly & Samararatne, 2024a). Constitutional culture offers an important leverage between formal decisions contained in the constitution and the constitution's survival.

Such a culture can also slowly foster the erosion of democracy, if they're missing or if he or she is subject to erosion. In the democratic backsliding story written by Fabio Wolkenstein, the authors particularly make the point that democratic retreat doesn't necessarily result from one clear break. It could instead come in a series of steps that stymie rights or undermine democracy, but maintain the "shell" of constitutional rule (Wolkenstein, 2023a). This is highly relevant especially as deterioration can happen through 'lawful processes' under the Constitution itself, which contributes to an increasing need to differentiate between legality and constitutionalism.

This paper demonstrates that constitutionalism without culture of the constitution is inherently fragile, considering the background. Formal constitutional provisions need to be backed by political actors who are willing to accept institutional constraints, public institutions that do enforce the law, independent courts and citizens who are aware of their rights and duties under the Constitution. Promoting democracies accordingly requires facing two challenges – building constitutional institutions and building the political, institutional and civic environment which makes them work.

In part 2 of the paper, the conceptualization of constitutional culture is introduced and the notions of constitutional culture, constitution text, and constitutional literacy are differentiated. It then explores the link between constitutionalism and democratic consolidation and finally the institutional, political and socio-cultural components which affect the weak constitutional culture in developing democracies. Constitutional backsliding, institutional capacity and the Pakistani context, are then focused. In the last section, it suggests ways to promote constitutional culture by institutional reforms, civic education, and constitutional accountability and devotion to the rule of law.

Conceptualizing Constitutional Culture

The constitutional culture is an intermediate phenomenon between the constitutional text and the constitutional practices. A constitution is a set of rules and structures that defines the government in power, provides a mean of distributing government power and determines constituted rights and institutional responsibilities. But constitutional culture relates to the attitudes, expectations, conventions and practices in which these formal institutions find their concrete meaning. It, therefore, gives an important explanation for how legal systems apparently with similar kinds of constitutions can be very different legally.

A basic point on which to start is the difference between constitutionalism and constitutional form. The key factor is that constitutionalism is not used up when there is a constitutional document which has been written down. Another argument raised by Nsongurua Udombana is that some African states have constitutions which explicitly affirm the rule of law, human rights and citizenship but this in practice does not necessarily equate to constitutionalism (Udombana, 2024). This difference matters a lot for emerging democracies because they rely not just on the institutions of the Constitution for their credibility, but for a commitment to constraints on

governmental power to be metabolized and sustained. A constitution might thus be a legal document but the constitutionalism itself might not be at all robust.

The need to realize that in developing a constitutional culture, one should avoid the narrow, court centric perspective of constitutionalism. Even if this liberal tradition in constitutional legal thinking is influential on the constitutional thinking in the West it is just one. Her research on Asian experiences reveals religious, socialist/ communitarian elements and highlights the fact that constitutional practice does not just occur in practices or documents of courts but also through other institutions and political processes (Thio, 2021). For developing democracies, in which constitutional powers can be influenced by other structures such as political parties, legislatures, administrative institutions, civil society, or traditional institutions and other social actors, this broader perspective is relevant.

Aileen Kavanagh's analysis of unwritten constitutionalism is further proof of the importance of informal constitutional norms. However even systems with a detailed written constitution rely on unwritten additional rules, conventions and political practices, for example, accountability, change of guard and relations between different institutions in the system (Kavanagh, 2023). The informal rules may be considered as part and parcel of constitutional culture in this sense, since they impact on the interpretation of the constitutional actors of the formally given powers. The written constitution provides the institutions and constitutional culture, many of the behavioral expectations through which the institutions operate.

ne should not however equate constitutional culture with what has been called with respect to constitutions, constitutional literacy. But as Maartje De Visser and Brian Christopher Jones note, constitutional literacy is itself a more malleable, more dynamic and multifaceted concept than knowing what is in a constitutional text (De Visser & Jones, 2024). It is important because citizens can have a great deal of information about what a constitution allows and does not allow, and still not have the sense of civic duty and respect that is correlated with constitutionalism as such. Similarly, with regards to constitutional culture, it is not simply about knowledge of the people, it is also about behavior of political and institutional players.

Last, there is a political dimension of constitutional culture in addition to its legal dimension. In political constitutionalism (as Robert Greaally demonstrates) constitutional orders can rely heavily indeed, not solely, on ordinary democratic politics. His comparative study on different ideological visions of political constitutionalism shows how or not constitutional institutions are upheld by assumptions of democracy, political authority and institutional responsibility (Greaally, 2024). Constitutional culture thus is not one 'true culture of the constitution'. It can be considered as an arrangement based on mutually accepted, contested, and evolving anticipations regarding the ways in which political power will be used within boundaries set by a sort of constitution.

As such, constitutional culture can be seen as the overall internal organization of the normative and behavioral framework inspired by the interpretation, acceptance and implementation of the constitutional rules. It is particularly evident where the formal design of constitutional platforms

are advanced, but political agents and citizens lack the conventions, restraints and democratic procedures that link the constitution to good governance.

Constitutionalism and Democratic Consolidation

Democratic consolidation is not just the continuous adoption of elections after the democratic change. It entails a gradual process of getting political rules, expectations, and restraints institutionalized where political competition takes place within the boundaries of an accepted constitution. Constitutional endurance and democratic consolidation, which are two processes interdependent, democratic values need to be known, applied and safeguarded in the light of political developments, explains Tom Gerald Daly and Dinesha Samararatne. Through their comparative study of seven Asian and African states, they show that there is not a uniform trajectory of consolidation but rather it takes different forms, in particular, when institutions, political parties, courts and civil–military relations are consolidated at different rates (Daly & Samararatne, 2024b).

Constitutionality and consolidation then ultimately rely on a basically institutional relationship. It could be said that constitutional orders are comprised of a collection of public offices that define the rights, powers, and duties of relationships between the citizens and state actors (Allen, 2024). This is important as the consolidation of democracy is more than just separation of powers. It expects those serving in office to take their office of the constitution seriously as a limited role, not as simply and authoritatively disempowering the people. Formal institutional structures can persist but with constitutional purpose eroding as constitutional offices are becoming 'personalized', and their powers regarded as 'political assets'.

The role of judiciary is also significant, if not paramount, in the process. The past few years have seen a growing body of research on democratic decay discussing how constitutional courts have often been created in new democracies to help consolidate the process of democratization, as well as to stem abuses of public power. But courts can't keep constitutional democracy alive by themselves if other actors don't pay attention to the constitutional limits (Allen, 2024). This means that constitutionalism needs to evolve within the relationship of constitutional law and political life, and not to be reduced to judicial interpretation.

A second dimension is that of the constitutional resilience. According to András Jakab, constitutional resilience is the ability of a constitutional system to resist efforts to change or violate its constitutionality (Jakab, 2023). Importantly, not all design is constitutional and this does not actually create resilience. Relies on interplay between constitutional rules and the political, social and cultural context in which they function. This is an important confirmation on the first instance of the present study that constitutional culture itself is a part of an environment that influences and decides whether constitutional protections become a reality or not.

Consolidation and economy and social status can also be influenced. The comparative analysis of the former Yugoslav republics by Miro Haček links the withstanding of democracy to economic

development, as well as democratic institutions, human rights, fundamental freedoms and rule of law (Haček, 2021). It is not that economic development is a prerequisite for constitutionalism but that constitutionalism exists within social and material layers. Public trust in constitutional government can be undermined where institutions are still not adequate to provide public goods, serve a basis of security, or safeguard fundamental rights.

Indian experience, in particular, reveals that the concept of constitutional endurance cannot be entirely used to account for the formal design of a constitution. In this context, Sujit Choudhry highlights the importance of checking the over-concentrated exercise of political power in the constitutional democracy of India by the mechanism of inherent institution and political competition (Choudhry, 2022). Indian history also shows that resilience of the Constitution does not necessarily arise from any single safeguarding provision but can come from the intertwining of constitutional form and function, constitutional dogma and political practices, and the federal system and competitive politics.

Democratic consolidation can thus be viewed as a process whereby constitutional rules are integrated into institutions' practices and expectations. Elections are a crucial component of democratic accountability, constitutional democracy involves more: it requires some understanding of limits to be placed by the institutions, respect for rights, lawful transfers of authority, effective checks and balances, and a willingness of political actors to abide by the rules of the game, even when that means a short-term political price. Unless developed through relations such as these, the constitutional framework perhaps can stand, whereas democratic institutions may be left standing without the Constitution relying on the will of those in power.

Why Constitutional Culture Remains Weak in Developing Democracies

The absence of constitutional culture in developing democracies cannot be only blamed on one fault in the system of institutions. It is usually the result of a combination of historical heritage, politics, institutional fragility and social identity fractures, as well as the differential incorporation of constitutional principles. The cultural and political behavior that is key to maintaining democratic institutions evolves much slower than a written constitution that can set them up quickly. Cheryl Saunders comparative-analysis of constitutional cultures shows that culture influences constitutional democracy at the constitution-making, implementation and long-term-consolidation phases (Daly & Samararatne, 2024c). It is significant especially for the reason that the formation of a constitutional culture cannot, in and of itself, be achieved by simply enacting a 'new' constitutional text.

One challenge is that of the old political traditions and the authoritarian system. Constitutional change is often part of a process of change that takes place inside societies where political institutions for years governed the dynamics from hierarchies, centralization or personalization. This is a problem that can be seen in the Ethiopian experience, which Adem Kassie Abebe studied, because it is possible to have a transition in the constitution with powerful socio-political traditions that hinder transition and democratic change (Daly & Samararatne, 2024d). Such

traditions are important because the running of constitutional institutions is not in a historical vacuum. Political actors can still rely on inherited conceptions of power in the exercise of their constitutional powers even after the playing rules of the game have shifted.

The second challenge is to the personalization of political power. Constitutionalism demands those who hold office to recognize that their power is delegated to them for a limited period of time, by virtue of institutions, and subject to a set of limits set forth by law. When political power is personalistic; i.e. when concentrated on individual political leaders or political networks, there can be instrumental readings of the Constitution. The study of constitutional amendments across Africa, the formal validity of parliamentary amendment procedures can be used as a tool to downstream the constitutionally imposed constraint and democratic competition by dominant political actors(Abebe, 2024a). The importance of "legitimacy" of a legal act is highlighted for him, noting that an act is legitimate only if due process has been followed, and broad political consensus can be important in averting outright change to basic constitutional rules.

The other important component is political parties. Rather than merely as electoral organizations Mouli Banerjee's comparative analysis of democratic transitions and backsliding in Asian and African states deems political parties as the key instruments of constitutional change (Ginsburg et al., 2024). Parties exist in specific tools and settings and are at the same time actors with the potential to enhance or weaken democratic institutions. Parties may be the only users of constitutional institutions in a way that serves partisan ends when they see them as primarily tools in the political struggle. On the other hand, if political competition is taking place under the rubric of constitutional rules that are routinely followed, then the parties help institutionalize democratic procedures.

Another challenge comes from weak and/or asymmetrical civil–military constitutional relationships. Shanil Wijesinhacum Daniel Alphonsus have shown that constitutional principles do not singularly define and establish the dynamics between civilian government and security forces. According to their analysis, the impact of constitutional reforms is greatly influenced by the prevailing distribution of power and other context factors (Crouch, 2025b). his is especially relevant during the process of a developing democracy, where it is possible for military institutions to have significant political and/or institutional power. There can be a formal indication that civilian rule has been established, but political practice may show otherwise, such as a constitution dictating civilian supremacy.

Presented as a related, but different challenge, is the judiciary. On the other hand, Julius Yam warns that it is not a foregone conclusion that the constitutional courts in transitional countries will work to consolidate democracy (Yam, 2023). There are very different modes of transition and even if there exists a constitutional court, there isn't a clear definition of the right judicial reach and how one can do it. This is an observation that calls into question court-focused notions of constitutionalism. While courts can enforce constitutional limitations, constitutional culture also relies on the acceptance of constitutional limitations by legislatures, executives, political parties, civil society as well as citizens.

Last but not least, emergency governances can reveal the extent of constitutional culture. In the comparative study of Asian and African states, Joelle Grogan demonstrates that emergency powers also have the power to put the constitution to the test, with an analysis focusing on parliamentary oversight, judicial scrutiny and any restrictions on the powers of the executive (Grogan, 2024). Merely having emergency provisions, therefore, is merely a part of the constitutional calculus. Much of their meaning depends on whether those that wield such powers, or those that would empower them to do so, are aware of such powers as limited and temporary, not rights to expand indefinitely the power of a political executive.

These factors reveal that constitutional culture is dilute if formal constitutional institutions grow at a faster pace than political norms necessary to uphold them. Historical authoritarianism, personalized power, partisan interpreting and enacting of the constitution, civil–military imbalance, lack of institutional capacity, and a perhaps excessive practice of emergency law can each contribute to the gap between constitutional law and constitutional conduct. This means that as much as it is a problem that there are no constitutional rules, it is a problem that there are not yet proper political habits that come from constitutional rules.

Institutional and Political Challenges

The lack of constitutional culture is more evident in the routine operations of politics and state institutions. The institutional element of constitutional democracy does not mean simply having legislatures, executives, courts, election-related bodies and institutions of accountability, it also requires their parties to respect their own constitutional limits. In contrast, formal institutional arrangements can stand, their real meaning slowly waning, where institutional actors see the constitutional barriers as counterproductive in meeting political goals.

Informal political power, which is one major challenge, typically rests with a small but powerful group of individuals, who occupy key decision-making positions and make up the ministerial elite. The importance of formal separation of powers in constitutional systems can be undermined by the fact that in many cases, political power is consolidated through informal means (Grogan, 2024). Superficial adherence to constitutional procedures may be maintained, and independent institutions might also be maintained, but political pressure in making appointments, running institutions and making decisions makes checks and balances ineffective. This is one important aspect of weak constitutional culture – institutions can be formally “right” and substantive “wrong.”

An instrumental use of the constitution on the part of amendment is a related issue. If there are changes, amendment of the Constitution is normally a proper way of society to evolve its Figured Document and to adapt to the change. However, Adem Kassie Abebe demonstrates that amendments can be used in a dominant-party context to have the same effect as an unconstitutional measure but on a legal guise (Abebe, 2024b). Thus, the problem is not the amendment per se but the lack of a political culture that sees constitutional change as something that has to be done in an institutional way that involves deliberation and a broad legitimacy.

Temporary political majorities are able to change basic structures as they see fit, when it is in their interest.

Another institutional difficulty is misleadingly called legislatures. Parliaments play a pivotal role in democratic constitutionalism, as they turn the will of the people into law, in a process that is designed to make lawmakers deliberative and accountable. But studies on legislative backsliding have shown that democratic setbacks can come in uncontroversial law-making ways, manifested in incremental legislative decisions, and not in a dramatic constitutional breach (Sebők et al., 2023). This is significant, as in order to have culture of constitution it has to be seen at the level of routine governance. When parliamentary majorities regularly act with a view of party rather than procedure, and do not abide by the constitution, including its weight in opposition rights, institutional checks, and minority protections, constitutional decay can take place with no formal derogation of the constitution having taken place.

The Judiciary is caught up with a special predicament. While the courts might safeguard the constitutional limits, the extent of judicialization can also cause the transfers of the political issues from the representative bodies. Expansion of the Judicial Review in Pakistan's case in relation to political questions (Amin, 2023). However, there is no question of its being compatible with constitutionalism, since it is a constitutional mechanism in place, but of the balance between judicial enforcement and democracy in decision making. Judicial independence and constitutional self-restraint are needed, then, in a constitutional culture.

One difficulty is that of ensuring that constitutional fundamentals themselves are not outlawed by law. The answers to why constitutional systems evolve means that enable unamendability and democratic backsliding, as set out in Suteu's comparative study, provide a worthwhile beginning to the discussion (Suteu, 2024). These mechanisms aim to guard against "temporary" political majorities from exercising formal amendment powers so as to erode core elements of constitutional democracy. Meanwhile, Suteu's comparative analysis reveals that these kinds of teachings have an unconfirmed history that is subject to contextual interpretation. No legal mechanism will supplant the need for political will to respect the constitution.

Lastly, constitutional culture is undermined by a lack of constitutional actors' common understanding of institutional legitimacy. Tarunabh Khaitan speaks about unwritten constitutionalism, focusing on how constitutional orders are not limited to the written law or courts but encompass all other constitutional actors including the executive, the legislative, the civil service, electoral institutions, civil society groups etc (Begicevic & Balint, 2023). This more comprehensive understanding showcases the failure to account for constitutional culture in terms of judicial doctrine. A constitutional form of government is based on a distributed system of institutions and practices, much of which consists of conventions and expectations that don't actually have a legal force.

There is also, therefore, a cumulative institutional challenge to the developing democracies. There may be a cumulative effect of executive centralization, partisan amending of the constitution,

legislative majoritarianism, judicialization, weak institutional independence and fading respect for constitutional norms. Individually they can be considered as small developments, but taken together they can undermine the informal bases without which constitutional restraints are likely to be ineffective. Constitutional culture thus is not maintained through the presence of a single institution as an atmospheric watchdog for the constitution, but by several institutions' constitutionality and their voluntary embrace of constitutional authority as a framework that introduces real constraints on the use of political power.

Constitutional Backsliding and the Erosion of Constitutional Culture

One of the most obvious examples of a poor-quality constitutional culture is constitutional backsliding. Backsliding is not necessarily dramatic constitutional collapse, and it often takes place step by step, and primarily by diminishing the efficacy of democratic checks and balances. Fabio Wolkenstein sees democratic backsliding as a soft form of regression that can start slowly with the progressive gradual erosion of the enjoyment of constitutional rights, or more abruptly by their actual suspension (Wolkenstein, 2023b). This is important as it reorganizes the focus from dramatic institutional crisis to small but ongoing evolution of the normal functioning of constitutional governance.

Thus 'backsliding' may be possible without formally rejecting a constitution. Gutmann and Voigt (2023) define the constitutional compliance problem as a key element of democratic erosion and stress the need to have institutional mechanisms which can withhold consent to political actors trying to "bypass the constitution" (Gutmann & Voigt, 2023). In "militant constitutionalism", their formal constitutional rules are not enough because actors' political incentives allow them to take advantage of loopholes and flaws in the constitutional rules. The difference between constitutional text and constitutional behavior is thus of particular significance: The continuity of constitutional provisions does not necessarily mean the continuity of constitutionalism.

It's an actor-based process as well. Democratic backsliding is a phenomenon that engages a variety of actors: elected political elites, courts, social movements, organized interests, media groups and the people themselves (Druckman, 2024). His schema can help to explain constitutional culture because it does not presume that democratic backsliding can only be attributed to executives. Conduct of various actors thus reproduces constitutional culture, and a bad constitutional culture can arise out of the dynamics between political elites, institutions and society.

Public constitutionalism is also a theme of recent scholarship. Formal institutional protection is not guaranteed to ensure the possibility of liberal democracy, and it is crucial to have an ethos supported by the public, which includes both democratic and constitutional dimensions (Tinnevelt, 2025). It is an observation directly related to the idea of democratic resilience and the culture of the constitution. When citizens and political actors see either affordances as simply technical requirements or adequate protective measures as merely formalities, then they are easily corroded.

Further steps to this can be taken through constitutional amendments. In the case of Turkey, Selin Bengi Gümrukçü's work showcases how constitutional amendments serve as a tool to reconfigure institutional mechanisms that have the potential to bolster judicial independence, authority, and legislative oversight, as well as political opposition, despite seemingly maintaining the veneer of legality (Gümrukçü, 2024). This phenomenon brings a concept of legal validity, and the importance of a distinction of constitutional legitimacy, into focus. A measure can be formally legal and in form meet the criteria for an amendment of the Constitution and have at the same time a damaging effect on the conditions that are the very foundation of constitutional democracy.

Consequently, this constitutional culture disintegration may be gradual. Taken individually, restrictions on institutional independence, manipulation of constitutional amendments, weakening of opposition, and rights over time may seem feasible. The cumulative impact can be broader changes in practical implications of constitutional government, however. Constitutional backsliding is thus not only an institutional, but also a cultural issue. When constitutional norms are not firmly embedded in the political and social consensus, those who want to use the power have few more or less informal constraints on the extent of constitutional erosion.

The most basic of lessons is that constitutional resilience is more than just institutional protections; it also depends on political culture that is committed to upholding constitutional protections. While courts, legislatures, electoral institutions and constitutional amendment mechanisms are important sources of protection, it will be the political actors and citizens' will to see constitutional constraints as constraints that will make the difference in effectiveness. In absence of this commitment, constitutionalism might only exist in name, but become more and more dilapidated over time.

Pakistan and Other Developing Democracies: A Comparative Perspective

Pakistan offers a very relevant perspective to explore the issue of tension between constitutionalism and constitutional culture. Since 1973 the country has an accurate written constitution comprising of fundamental rights, parliamentary system, judicial review, federalism, and institutional checks and balances. However, the history of such working provides solid evidence that the constitution alone is no guarantee of constitutional stability. Recent studies of the development process of the Pakistani constitution particularly highlight the interaction between the political institutions, judicial power, civil-military relations and democratic competition (Greene & Khosla, 2018).

The Pakistani example and the Maldives, who after a long monarchy and authoritarian rule adopted the 2008 Constitution, which brought multiparty democracy and additional constitutional rights expansion can be compared. As per Mariyam Zulfa's analysis, factionalized political parties and historical experience oriented political practices accompanied with the constitutional transformation (Daly & Samararatne, 2024e). As for the Maldivian example, this is therefore an illustration that constitution-making can proceed quicker than can be evolution of a

constitutional culture. There should be rights and democratic institutions formally recognized and political actors as well as citizens should get used to constitutional participation, and institutional restraint.

A different, but related example comes from Thailand. In the post-2014 period, Khemthong Tonsakulrungs characterizes the country's constitutional evolution as one of "abusive constitutionalism" between 2008 and 2014 in which the original sense of the Constitution as a tool of change became a means of affirming the existing political order (Crouch, 2025a). As the Thai case illustrates, constitutionalism can be undermined via constitutional means. The most important point to be made is that in developing democracies, the default form of attack on democracy is not necessarily a clear, illegal, unconstitutional grab for control: constitutional means are also frequently used to re-structure institutions so as to weaken democracy.

There are similar challenges in other African countries. Evaluation of constitutional amendments shows that meeting the constitutional mechanisms by which they are implemented does not mean necessarily that they demonstrate democratic legitimacy (Adem Kassie Abebe). Constitutional amendment can be a tool of democratic erosion when it is used by dominant political groups who can make changes with approval by other major political parties (Abebe, 2024c). But his advocacy of wide consensus is not confined to Africa: it's a core lesson – for fundamental constitutional change not to be an act of short-term, temporary political party's majority.

Malaysia presents a comparison that is a bit different. Over the course of 2018-2021, there were several developments on the constitutional front, both good and bad, as detailed by Dinesha Samararatne and Tom Gerald Daly, which illustrate with clarity the potential for constitutional change during a major political transition (Klug, 2018). As shown in the Malaysian experience, democracy relies on more than just turning journalists into a minority in the parliament, but rather on democratic change as a whole. Reform will need to be 'locked-in' through institutions and political actors will have to learn practices that can allow for constitutional commitments to persist beyond the initial political situation that facilitated reform.

Thus, the comparative evidence indicates that there are no unique constitutional issues in Pakistan. In every case of developing democracy, similar problems emerge due to the lack of constitutional culture, regardless of the institutional arrangement. The historical authoritarian legacies, politically divided parties, institutional rivalry, constitutional manipulation and poorly rooted democratic norms continuously reveal the disassociations between constitutional aspirations and constitutional practice. The cases also illustrate the non-linear nature of constitutional development which takes place through political participation, institutional learning, reform, judicial practice, and civic engagement. In the principal comparative lesson it therefore emerges that the endurance of the constitution is not just a matter of the sophistication of the constitutional text; one also needs a social and political embedding of constitutional norms.

Strengthening Constitutional Culture

In order to achieve the transition towards a "constitutional culture", we must move from a text-centred and narrow concept of constitutional culture to a wider one including institutional, political and civic development. While chances are important they ought to be allotted towards conditions where constitutional rules will shortly come to be conventional in each day institutional behavior. Recent comparative studies show that constitutional resilience is best found with legal protections combined with political norms and institutional practices that are likely to withstand democratic erosion (Amosu, 2022a).

First of all, constitutional education and literacy need to be enhanced, as it is until now, only basic information is provided about constitutional provisions. Citizens should be aware of their rights as well as the role of institutions, the boundaries of public power and the importance of lawful political participation as guarantees of the security of the rights they know. Constitutional literacy can then help to build citizens who are able to identify institutional abuse instead of using a constitutional issue as being lawyer's and judge's concerns.

Secondly, political parties should be considered as constitutional actors. My analysis of constitutional amendments reveals how parties can be critical both for politics of contestation and constitutional self-restraint (Abebe, 2024d). Major constitutional changes resulting in changes to elections, judicial independence, fundamental rights or the distribution of political powers should, therefore, be accompanied by cross-party consultation. These processes can help the amendment of the constitution to become more deliberative without ruling out constitutional adaptation as an acceptable option.

Lastly, institutional capacity needs to be added to constitutional rights. The authors of the comparative study on constitutionalism and state capacity conducted in 2024 in the present study contend that constitutionalism cannot just be explored through judicial accountability of public power (Zafar et al., 2024b). Constitutionalism, however, is important not only because it serves to bring an end to the rule of law, but because of the effectiveness of government institutions, including their ability to implement constitutional decisions and provide public services. Thus, the establishment of a constitutional culture of rights entails administrative mechanisms that can bring about a change in reality based on constitutional mandates.

Fourthly, they determine that constitutional institutions should have the capacity to be preventively resilient and not just "respond to crisis". Proactive Constitutional change is essential, and that the process of reversing democratic decay will be more challenging once key institutions are captured or weakened by political actors (Amosu, 2022b). Constitutional systems should audit how vulnerable their electoral processes, independence of justice, accountability mechanisms and emergencies powers are and make changes accordingly so that they do not fall into a major constitutional crisis.

Finally, public acceptance of constitutional restraint is needed. The practical meaning of constitutionalism has many facets, from courts to legislatures, from executives to political parties,

from media, to civil society, from universities to citizens. A permanence of delegating constitutional resilience can therefore not be delegated to courts or constitutional commissions. It demands a more general consensus around the idea that the exercise of political power is legitimate under law and that constitutional institutions are legitimate even if they limit the short-term preferences of those that run the government.

The purpose should not be to establish an unflexible, absolute, written Constitution. Instead, constitutional systems capable of accommodating political change without sacrificing democratic fundamentals are needed for the flourishing of democratic practices in developing democracies. Constitutional culture is strengthened when constitutional change is participatory, institutions function well, political competition is constitutionally framed and citizens' understanding of constitutional government is not static, but an ongoing phenomenon.

Conclusion

However, simply having a written constitution, constitutional courts, fundamental rights, or formally delineated limitations on government would not be sufficient to uphold the principle of constitutionalism. All these elements give the constitutional government a legal force, but not in themselves do they ensure the political behavior will be influenced by these constitutional principles. The sustenance of constitutional democracy ultimately relies on the evolution of a constitutional culture wherein public officials, political parties, institutions, civil society and citizens understand and embrace the restraints under the Constitution as legitimate and a normal way of conducting governance.

The gap, however, that can occur between the constitutional text and the insofar-as-practiced constitutional practice has thus become the central challenge to the development of a democracy. A constitution can offer great protections while political institutions still function through informal customs, personalized power, partisan political negotiations, official interference and/or whimsical interpretation of constitutional limitations. When constitutional norms are constantly relied on in political expedient fashion and fail to develop as lasting norms, they become more and more reliant on the preferences of those with power.

The culture of the Constitution therefore must be considered as necessary for the design of constitution. It is built up as a result of repeated institutional practice, political socialization, civic education, respect for the constitutional conventions, independence of the judiciary, accountability of the legislature and the public's expectations of lawful exercise of power. It cannot be imposed just by constitutional amendment or a judicial ruling. It entails the progressive integration of constitutional values in the institutions that hold public power and on society in general.

Experience of the construction of democracies also shows that the deterioration of the constitution can be a process of length of time. The democratic institutions can still remain and the curbing of power is gradually undermined. By themselves, political polarization, institutional conflict, emergency measures, executive centralization, manipulation of the constitution, and lack of

deference to institutional limits can lead to the erosion of the constitutional system; they do not immediately lose the democratic nature of the regime, but they contribute to its erosion.

The efforts of constitutionalism therefore, must not only consist of drafting sophisticated constitutional provisions. It needs political actors prepared to submit to institutional limits, courts willing to uphold constitutional limits within constitutional boundaries, legislatures willing to exercise any meaningful oversight, efficient public institutions, and citizens who gain knowledge about and advocate for the rule of law and the constitution. The promotion of constitutional education and civic engagement is crucial, as constitutional democracy cannot sustain itself institutionally if constitutional values are not understood outside of legal institutions.

Finally, the issue of constitutionalism without constitutional culture is one of implementation, legitimacy and political behavior. But for developing democracies to exist, they must be served by constitutions which will constrain the power of the government; more than this, however, they must have political and social settings where that constraint operates. Constitutional democracy's long-term health and vitality will therefore not only be tied to the goodness of the constitutional text itself, but to the will of successive generations of political and institutional elites to uphold its principles.

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