

The Queen can do no Wrong: An Examination of the Reign of Queen Elizabeth II in Africa and the Position of the British Monarch with Regard to International Crimes

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Abstract:

Queen Elizabeth II would be remembered by many as a great queen who ruled and reigned for more than seven decades. Her seventy years of reigned as the British Monarch has imparted the world and the African continent whom she has visited more any other continent even before she was crowned as the British Queen. Indeed, Queen Elizabeth II was even proclaimed as British Queen while in Africa. Although many African leaders have hailed the Queen for the roles she played as the leader of the Commonwealth besides being the crowned Monarch, others have accused her for colonial crimes and harsh British practises administered by British colonial administration in Africa. Accordingly, the Queen ascended into the throne during the peak of decolonisation of Africa. International law protects the Queen in her capacity as the British Monarch and as the head of state or leader of the Commonwealth nations. This article examines reign of Queen Elizabeth II and argued that the British Monarch is protected by international law rule on immunities as the head of state of the Commonwealth nations and as a Constitutional Monarch of the United Kingdom (UK), despite many accusations from the African continent. Consequently, the immunities accorded by customary international to senior state officials also protects the Queen in her capacity as the British Monarch and as head of state to the Commonwealth nations. It further maintains that the position of the Constitutional Monarch exempts them for committing crimes unlike the British Prime Minister who exercises political power and could be charged and prosecuted for international crimes.

Keywords:

Queen Elizabeth II reign; head of the commonwealth; British Monarch; international crimes; immunities

I. Introduction

The British Monarchy originates from the Petty Kingdoms of Anglo-Saxon England and the medieval Scotland (Monarchy of the United Kingdom, Wikipedia 2022). These Petty Kingdoms consolidated into the Kingdoms of England and Scotland by the 10th century. In 1066, the Normans conquered England and eventually, Wales gradually became under the control of the Anglo-Norman (Norman Conquest, Wikipedia 2022). The Magna Carter began the process of reducing the political power of the English monarchy in 1600 century (Magna Carta, Wikipedia 2022). After 1603, a single sovereign ruled the English and Scottish Kingdoms. From 1600 to 16649, republican Commonwealth of England broke the tradition of the Monarchy after the wars of the three kingdoms (Commonwealth of England, Wikipedia 2022). After the Glorious Revolution, William III and Mary II were installed and crowned as Monarch and co-Monarch representing England and Scotland respectively (History of the Monarchy in the United Kingdom, Wikipedia, 2002). The Bill of Rights 1689 and its Scottish counterpart, the Claim of Rights Act 1689 further curtailed and limits the power the Monarch and excluded the Roman Catholics from the succession to the throne. In 1707, the Kingdoms of England and

Scotland amalgamated to create the Kingdom of Great, and in 1801, the Kingdom of Ireland merged to create the United Kingdom of Great Britain and Ireland. The British Monarch was the head of a vast British Empire until 1921 (History of the Monarchy in the United Kingdom, Wikipedia, 2022). After the WWI, majority of the British colonies and territories became independent bring the end of the empire. King George VI (the father of Queen Elizabeth II) and his successor, Queen Elizabeth II and Charles III (the current King of England) adopted the title of Head of the Commonwealth. The United Kingdom and its 14 independent sovereign states share the same person as their monarch and Charles III currently leads this the Monarch. Although the Monarch is shared, each country is independent of the other.

Today, the United Kingdom is a Constitutional Monarch (Constitutional Monarchy, Wikipedia 2022). While the Queen or King is the head of state, the political power is administrated by the parliament under the leadership of the Prime Minister (Monarchy of the United Kingdom, Wikipedia, 2022).

II. Research Methods

This article used empirical qualitative research methods. This research method is an enquiry process of understanding based on distinct methodological tradition of investigation that explore a social or human problem. The method builds a complex, holistic picture and approach, analyses words, reports and conduct the study in a natural setting. In other words, the methods used in this investigation seeks to study phenomena in a naturalistic setting and attempts to interpret phenomena in terms of its legal meaning (Creswell, 2010). The methods consider context as very important and describes a process or set of conditions and experience. Finally, as qualitative research, the investigation used a biographical study (for example Queen Elizabeth), a grounded theory (for example immunity), and a case study. Empirically, drawing inspirations from cases involving the prosecution of senior state officials before the ICC and Rome Statute allows this investigation to arrive at its conclusion (Aghem, 2021).

III. Discussion

3.1 The Reign of Queen Elizabeth II

Queen Elizabeth II is the longest British Monarch who reign for more than seven decades. Her rise to the throne and her role as commonwealth leader characterised her reign. Elizabeth II succeeded her father King George VI who died while sleeping in February 1952. Accordingly, King George VI was discovered death at Sandringham by his servant delivering his morning tea during his royal retreat. Princess Elizabeth who became Queen Elizabeth II in 1952 was only 25 years old when she lost her father. Even though the death of King George VI grieved the British nation, the fact that Princess Elizabeth was next to the throne wiped their tears as it is always was a good sign for the nation when a female is on the throne. Accordingly, Britain prospers and grows great under the reign of a queen. Thus, the prosperity of Britain was noticed and experienced during the reign of Queen Elizabeth I from 1558 to 1603. Just like Elizabeth I, Queen Elizabeth II has certainly rebuilt Britain and made it to become a great modern nation after the post wars destruction. The beauty of Britain was displayed in the 2012 London Olympics and the role Queen Elizabeth II played with actor Daniel Craig (James Bond) during the opening ceremony. According to the Constitution of Britain, even though her role is mainly ceremonial to the nation, she is equally, seen as the symbol of unity to the nation (Queen Elizabeth II 15 Moments in her Reign, History 2022). In 2011, she was the first queen to visit Ireland for more than a century of strenuous relationship, mending over 800 years of hatred between the two countries (Queen Elizabeth II prophecy, Opinion CNN 2022). In nutshell,

Queen Elizabeth as head of State undertakes constitutional and representative duties developed many years ago. As a Sovereign, she is the focus of national unity, identity and pride of the nation. Finally, in exercising all these duties, she is supported by members of the royal family (The Royal Family, Express.co.uk 2022).

3.2 Queen Elizabeth II and the Commonwealth Nations

The Commonwealth is an association of independent nations, and an intergovernmental organisation that currently comprises of 56 states. The Commonwealth title was devised in the London Declaration of 1949 and it was headed by King George VI. The British Commonwealth was a group of eight countries in 1949 and these countries include the United Kingdom, Canada, Australia, New Zealand, South Africa, India, Pakistan and Ceylon. This Declaration mandated King George VI as head of the Commonwealth. However, when some of its members such as India and Ireland became a republic with a constitution, the King ceased to be their monarch.

Queen Elizabeth II became head of the Commonwealth on her accession to the throne in 1952. Since then, the Commonwealth bears no resemblance to the empires of the past. The Commonwealth is an entirely new conception built on the highest qualities of the spirit of men, friendship, loyalty and the desire for freedom and peace. Queen Elizabeth was also known to have been behind the scenes of ending apartheid in South Africa. The Queen had a personal Commonwealth flag created in 1960, which symbolises her as the head of the Commonwealth without being associated with her role as the Queen. Consequently, Queen Elizabeth II was the head of state of 15 member-states of the Commonwealth. However, she did not have any role in the governance of any of the Commonwealth states by virtue of her role as the head of the Commonwealth. Thus, the Queen kept in touch with the Commonwealth Secretary General and the Secretariat of the Commonwealth.

Furthermore, as the head of the Commonwealth she attends biennial Commonwealth head of government meetings. During the summit, she held several private meetings with Commonwealth countries head of government, reception dinner and a general speech. She also attends the quadrennial Commonwealth games. The Queen Baton Relay held prior to the beginning of the Commonwealth games carries a message from the head of the Commonwealth to all Commonwealth nations and territories. Finally, every year on Commonwealth Day, Queen Elizabeth II broadcasts a special message to all the 2.5 billion people of the Commonwealth (Head of Commonwealth, Wikipedia 2022).

3.3 Queen Elizabeth II and Africa

Queen Elizabeth visited more than 20 African countries during her reign as the Queen of Britain (Queen Elizabeth II and Africa, France 24, 2022). It was also during her reign that most African states got their independence from their colonial masters and eventually the end of British Empire. After independence, a special link to Britain continued through the Commonwealth of Nations led by the Queen (Mixed Feelings among Some in Africa for Queen Elizabeth, Reuters 2022). Indeed, it was a complicated and sometimes close relationship between British Monarchy and post-colonial Africa. While in Africa even before she was crowned Queen, Princess Elizabeth made a dedication to the service of the Commonwealth during her 21st birthday in Cape Town, South Africa. Moreover, Princess Elizabeth was in Africa when she got the news of her father's death and that she is next to the throne in 1952 (Queen Elizabeth's Death Renews British Empire Debate in Africa, The New York Times, 2022). Accordingly, after getting the news about her father's death, her status changed immediately from Princess to Queen while in Africa. In other words, she was first recognised as Queen in Africa because she left Britain as Princess and returned to Britain as Queen.

Queen Elizabeth was equally seen in many occasions across Africa even after independence from British colonial rule (Queen Elizabeth II and Africa: From an iconic dance in Ghana to friendship with Mandela, France 24, 2022). In Ghana, she was seen dancing with President Kwame Nkrumah in 1961 and was greatly welcome by Ghanaian authorities. Moreover, the Queen was also spotted in South Africa in many occasions before and after she was crowned Queen (Queen Elizabeth II and Africa: In Pictures, BBC News 2022). When Apartheid ended in South African, Nelson Mandela met the Queen in several occasion even before he was elected president in 1994. In 1995, the Queen travelled to South Africa to meet President Mandela. Indeed, Queen Elizabeth II and President Nelson Mandela were great friends and their cordial relationship grew up to an extent that both were address each other friendly. The Queen refers to President Mandela as Nelson while Mandela simply called the Queen Elizabeth. Many other African leaders met with the Queen after independence and she was greatly honoured and revered in the continent of Africa (Mixed Reactions in Africa to passing of Queen Elizabeth II, African Business 2022). Notwithstanding the great respect and admiration of Queen Elizabeth II in African, cloud of colonization hangs over her legacy in the continent, which has resulted in mixed reactions after her death on 08 October 2022, (Mixed Feelings among Some in Africa for Queen Elizabeth, Reuters, 2022). These mixed and ambivalent reactions regarding the reign of Queen Elizabeth II in the African continent have been expressed by diverse individuals in difference sphere of influence. In Nigeria, Professor Uju Anya said that in the 1960s, the UK supported a military dictatorship that crushed the Biafra rebellion in the eastern region of Nigeria and therefore the Queen should not be remembered. Similarly, in South Africa, the Economic Freedom Fight (EFF) said they would not mourn the Queen for her country's historical attempts to dehumanize the people of Africa according to EFF President Julius Malema (Cloud of Colonialism hangs over Queen Elizabeth's legacy in Africa, CNN 2022). Nevertheless, in Gambia, and Sierra Leone, the Queen was greatly honoured. In Gambia for example, Fatou Camara, an entrepreneur and communication advisor said the Queen's death should be celebrated because she spent most of her life doing great things for people. While in Sierra Leone, one resident said, the Queen has set an example for the rest of the World (Mixed reactions from across the continent of Africa to the death Queen Elizabeth, Euronews 2022).

In Kenya, the Queen legacy was also questionable. While the current and former President applauded the Queen, the Mau Mau uprising supported by the British colonial administration started in 1952 when Queen Elizabeth II took the throne. The colonial administration carried out extreme acts of torture, including castration and sexual assaults on over 150 000 Kenyans. However, the British government recognised the assault and human rights violation and the British court awarded 19.9 million pounds to be shared between 5000 claimants from Kenya (Africa Expresses Mixed Reactions to the Death of Elizabeth II, Le Monde.fr 2022).

3.4 The Queen can do no Wrong

As the head of the Commonwealth nations and the demised Queen of Britain, head of state immunity protected Queen Elizabeth II. These immunities include immunity *ratione personae* and immunity *ratione materiae* (Nanda, 1999). Immunity *ratione materiae* on the one hand attaches to the official acts that are exercised in accordance with certain state policy by using the apparatus of the state, and since the officials who performed such acts acted as instruments of the state, it is the state rather than the individual officials in his or her personal capacity that is responsible for such acts (Pedretti, 2016). Accordingly, immunity *ratione materiae* or functional immunity usually protects state officials from all official acts performed on behalf of the state (Dugard, 2005). This functional immunity attaches to all official acts executed by the officials representing the state. Most state officials, including the head of state, are accorded functional

immunity since the acts they perform are sovereign acts or *acta jure imperii* in their official capacity (Dugard, 2005). Accordingly, immunity exclusively covers the acts performed in an official capacity on behalf of the state and not the person (Bates, 2007). This is the reason why the acts performed in this capacity escape foreign scrutiny because they are sovereign acts (Koivu, 2001).

For these reasons, immunity *ratione materiae* will continue to protect the official acts even when the state official is no longer in office (Tomonori, 2001). Consequently, functional immunity will not cease but continue to shield both the current and former heads of state, as well as other state officials for acts they performed in their official capacity in the interest of the state or general public while in office (Bradley, CA & Goldsmith, 2009). Again, the rationale here is that the official acts would have been performed on the behalf and interest of the state (Mitchell, 1999). That is why even when the state officials are no longer in office; the acts will be regarded as official acts covered by functional immunity (Gaeta, 2009). Immunity *ratione personae* on the other hand or personal immunity (also known as status-based immunity) is attached to an office or status (Akanke, 2004), this immunity is absolute while the state official is in office and comes to an end when the person is no longer in office or has abdicated his or her office (Murphy, 2014). State officials entitled to this immunity are immune from the jurisdiction of other states in both civil and criminal jurisdictions for acts, which they would have performed in an official capacity and equally those carried out in private capacity (*R v. Bow Street Metropolitan Stipendiary Magistrate, ex parte Pinochet Ugarte (No.3)* [1999] UKHL 17, [2000]1 A.C.147). Immunity *ratione personae* also shields the state officials for actions amounting to international crimes irrespective of whether the actions concerned were executed before the person assumed office or when in office (*Democratic Republic of Congo v. Belgium, I.C.J., Judgment*, 14 February 2002).

Furthermore, immunity *ratione personae* is granted to only high-ranking and top state officials in office (*Khurts Bat v. The Investigating Judge of the German Federal Court*, 2011). It protects the holders concerned against any act of the authority of another state, which will hinder the high-ranking officials from the performance of their duties (Aghem, 2020). This personal immunity is now applicable to King Charles III who is both the current King of Britain and the head of the Commonwealth. The application of head of state immunity to the queen or king of England is different from any other head of state because the position of the Monarch is only relinquished by death. This means that only immunity *ratione personae* is applicable in this regard. In other words, neither Queen Elizabeth II nor King Charles III could be prosecuted for any international crime because this immunity is applicable to official acts that are not inconsistent with international crimes when the official is longer in office. Moreover, the position of the monarch in the UK is only ceremonial and most of the political decisions are made by the parliament under the leadership of the Prime Minister. Accordingly, given that most international crimes are politically inclined, the British Prime Minister may be prosecuted for international crimes committed while in office. Additionally, the United Kingdom is a state party to the Rome Statute and therefore does not recognise any form of immunities regarding international crimes (States Parties to the Rome States, 2022). The Rome Statute does not recognise both immunity *ratione personae* and immunity *ratione materiae*. (Article 27 of the Rome Statute). This Article provides as follows:

1. This Statute shall apply equally to all persons without any distinction based on official capacity. In particular, official capacity as a Head of State or Government, a member of a Government or parliament, an elected representative or a government official shall in no case exempt a person from criminal responsibility under this Statute, nor shall it, in and of itself, constitute a ground for reduction of sentence.

2. Immunities or special procedural rules which may attach to the official capacity of a person, whether under national or international law, shall not bar the Court from exercising its jurisdiction over such a person.

The general implication here is that if any member of the British Monarch especially the King or Queen is charged before the International Criminal Court (ICC), his or her status does not matter since the Rome Statute renounces both statuses based-immunity and conduct based-immunity. Fortunately, in the British Monarch, this is not the case as the position of the Queen or King is for life hence, the application of immunity *ratione materiae* is deterred. Additionally, the Monarch does not involve in politics but the Prime Minister, hence the Monarch might be considered criminally irresponsible with only very little option of committing international crimes. In other words, the British Prime Minister and other members of government are the ones likely to be prosecuted before the ICC for international if charged. Consequently, with regard to Queen Elizabeth II and King Charles III, it is safe to say the Queen or king can do no wrong. However, Queen Elizabeth II could only be prosecuted during her lifetime for colonial crimes committed by British administrators and officials during their colonial rule in Africa prior to independence. This position is difference with regard to her son, King Charles III who is the current reigning Monarch of Britain because he became King upon the death of her mother on 8 September 2022, many years after independence and therefore cannot be prosecuted for any colonial crimes, hence the King can do no wrong.

IV. Conclusion

Queen Elizabeth II will remember in Africa for her numerous visits to the continent and her friendly lifestyle with some of Africa's respectable leaders. She will also remember as the young princess who chose to celebrated her 21st birthday in Africa on the one hand and as the Queen who fought against apartheid behind the scene despite many accusations on the British colonial rule. She truly loved Africa as evident in her constant visitation to the continent even before she was crowned Queen of Britain. Indeed, the Queen once said "I think I seen more of Africa than anybody". After all, colonialism also has its own benefit even though the period was characterised by many evils. For example, the British educational and culture systems are still applicable to most former British colonies. With regard to the position of British Monarch and international crimes, the Queen or King can do wrong because of the following: (i) the British Monarch is constitutional monarch with very little or no political power. The Queen or King is a ceremonial head and therefore does not involve in political battle and power hunger which sometime results in human rights violation as seen in Africa; (ii) depending on who is on the throne either the Queen or the King is protected by both immunity *ratione materiae* and immunity *ratione personae*. In other words, the personal immunity of the Monarch is forever, since this immunity only ceases when the Monarch dies as the case with Queen Elizabeth II and finally; (iii) as the head of state of the Commonwealth nations, the Queen or King is also entitled to both personal and functional immunity like any other head of state. The functional immunity only is waived for acts that constitutes international crimes when the monarch is no longer on the throne. However, either situation is uncommon with the British Monarch because of the position of the Queen or King is for life. Accordingly, the adage that "the King can do wrong" is practically applicable to the British Monarch today. The position of a King or Queen in other countries is mostly held by presidents or heads of state who are often charged with international crime even while in office and usually prosecuted when their terms of office come to an end.

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