The Legacies of History? From Colonization to Integration in Britain and France

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“The tradition of all the dead generations weighs like a nightmare on the brain of the living.”
--Karl Marx, The Eighteenth Brumaire of Louis Bonaparte

How do we understand the effects of colonialism and decolonization on integration in Europe and the Americas? One important way is to gauge the institutional legacies of history. During the colonial era, countries such as Britain and France established a host of political and administrative institutions to rule beyond their borders. These had significant effects on how people worked, where they lived, what they learned, how they interacted with one another, and even how they understood themselves. It is natural to assume that some of these institutions have had enduring effects on metropolitan societies, particularly given the increasing diversity—in no small measure due to former colonial subjects migrating to the heart of the empire—in Western European societies after World War Two.

Yet the relationship between managing ethnically diverse societies in the colonies and managing them at home has rarely been carefully scrutinized. It is sometimes asserted that Britain and France had different colonial policies and that they now have different integration policies that seem in important respects similar to their colonial policies. Ergo, the logic goes, there must be a connection between colonial and integration policies in both Britain and France. Favell (1998: 3-4) sketches out the implicit argument as follows:

The responses of France and Britain [to the problematic of immigration], as befits their respective colonial reputations, appear to be almost reversed mirror images of one [an]other: France emphasizing

I am grateful for the excellent research assistance of Jill Parsons in the preparation of this paper.
the universalist idea of integration, of transforming immigrants into full French *citoyens*; Britain seeing integration as a question of managing public order and relations between majority and minority populations, and allowing ethnic cultures and practices to mediate the process.

How do we know, however, the extent to which colonial institutions affected integration policies? And what are the mechanisms by which the past affects the present?

This paper draws on the theoretical literature that has been developed over the past twenty years in the social sciences to illuminate the ways in which history affects current politics. It uses theoretically informed arguments to generate hypotheses about types of institutional legacies that might play a role in integration policies in Europe today. Specifically, it examines the role of policy legacies and state capacities, reactive decisions, and model transfer as potential connective tissue tying together the two eras. The paper then reviews the historical record to judge which types of legacy effects are most important in accounting for British and French integration policies. It finds that continuity in colonial and decolonization institutions had an important though primarily indirect impact on integration. Open immigration and citizenship regimes caused a large demographic influx of former colonial subjects. The arrival of these immigrants spurred policy decisions, which in some cases were reactions to the liberal policies established for colonial or decolonization purposes. This paper also finds little evidence to support arguments about model transfer. It demonstrates the complexity and lack of coherence of colonial and integration models, the absence of evidence that directly connects the two policy spheres, and the plausibility of alternative models for each country’s immigrant integration institutions. On the whole, the paper concludes that the relationship between colonial and integration institutions is less powerful than sometimes posited. It is certainly the case that colonial institutions played a significant, but indirect, role in a few key policy arenas, and it may be true that model transfer took place to a limited extent,
but it is not possible to argue that integration institutions owe their form primarily to colonial legacies.

In order to clarify this paper’s argument, it is necessary to be clear about what the paper does not argue. It does not attempt to offer a full account of integration policies in the two countries. Nor does it presuppose that the history of colonialism or decolonization was a central force in shaping integration strategies in Britain or France. In fact, one goal of the paper is to critically assess arguments that history matters in a clear and straightforward manner. The purpose here is to lay out a framework for objectively estimating the effects of institutional legacies of the colonial and decolonization periods on integration policies and structures in Britain and France. At first blush, this might seem a limited ambition, given that institutional legacies are hardly the only ones that matter (ideational legacies such as the construction of racial hierarchies and memories of the colonies immediately spring to mind). However, viewed from another angle, such an attempt might provide scholars with a vocabulary and a method for building a richer understanding of how the past influences the present.

Section one begins with a review of the relevant social scientific literature, using as a point of reference the concept of path dependence that has gained a foothold in economics, political science, and sociology since the early 1990s. Analyzing this literature leads to a focus on three particular institutional forces that might serve to connect the colonial era to integration polices and structures in contemporary Britain and France. The following sections examine each in turn. Section two looks at the effects of policy legacies and state capacities, section three at reactive decisions, and section four at
model transfer. The conclusion summarizes the findings and speaks to the relative importance of each factor, and of the institutional legacies as a whole.

I. History According to Social Science

Although many social scientists plumb the annals of history for empirical data, until recently few have sought to develop theoretical arguments about how the past affects the present. It is telling, for example, that the introductory chapter to a book subtitled *Historical Institutionalism in Comparative Analysis* spends pages describing, defining, and debating the term “institution” while hardly mentioning what must have seemed like the relatively unproblematic term “history” (Steinmo, Thelen, and Longstreth 1992).

Beginning in the 1980s, however, and picking up pace in recent years, economists, political scientists, and sociologists have begun to forge tools designed to help us understand not just *that* history matters, but *how* history matters. In particular, theorists have focused attention on dynamics of path dependence (David 1985; Mahoney 2000; North 1990; Pierson 2000a; Pierson 2000b; Sewell Jr. 1996).\(^2\) In its strictest versions, path dependence characterizes “historical sequences in which contingent events set into motion institutional patterns or event chains that have deterministic properties” (Mahoney 2000: 507). Put another way, unpredictable events—such as an assassination or an economic shock—set history on a course that cannot easily be changed (see esp. Pierson 2000a).\(^3\)

\(^2\) There are, of course, other effects of historical events on future politics that social scientists have long recognized (see, for example the literature on feedback effects, aptly summarized by Pierson [1993]). The focus of this essay is limited to discussing the effects of institutions at time 1 on institutions at time 2.

\(^3\) Another key element for social scientists interested in history is a concern with issues of timing and sequence (Mahoney 2000; Pierson 2000b; Sewell Jr. 1996). I set this aside here out of considerations of space, and also because this seems a less fruitful avenue to pursue given the particular topic at hand.
There are two types of paths that theorists typically look for when discussing path dependence. First, dynamics of “increasing returns” tend to produce continuity in politics and policies. Paul Pierson (2000a: 252) outlines this argument as follows:

This conception of path dependence, in which preceding steps in a particular direction induce further movement in the same direction, is well captured by the idea of increasing returns. In an increasing returns process, the probability of further steps along the same path increases with each move down that path. This is because the relative benefits of the current activity compared with other possible options increase over time. To put it a different way, the costs of exit—of switching to some previously plausible alternative—rise. Increasing returns processes can also be described as self-reinforcing or positive feedback processes.

The classic example of such an increasing returns process is that of the QWERTY keyboard (David 1985). Although the standard American keyboard is not the one on which individuals can type most quickly, alternative—and more efficient—keyboards have failed to replace QWERTY. Why? One reason is that typists have invested time in learning to touch-type on this keyboard. Any change would involve significant short-term costs in exchange for uncertain (or marginal) long-term gains. Moreover, because there is no market for alternative keyboards, there is no incentive for manufacturers to make them, further reducing incentives for typists to learn how to use them. In short, barring any dramatic transformations, the world is “locked-in” to using a keyboard where the most frequently used letters are not usually directly underneath typists’ fingertips.

Increasing returns variants of path dependent literature typically stress the continuities of politics or economics over time and the difficulty of changing paths due to initial sunk costs.

Another form of path dependent argument suggests that historical developments can sometimes be explained only with reference to their reaction to—and sometimes

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4 So named after the first six letters above the left hand on the keyboard.
5 This discussion relies heavily on that of Paul A. David (1985).
against—previous decisions. In these circumstances, an undeniable path of causation can be traced backwards from outcome to initial event, but that path is more likely to involve disruptions than continuity. Whether termed reactive or event sequences, Mahoney (2000: 509) outlines the logic as follows:

Reactive sequences are chains of temporally ordered and causally connected events. These sequences are “reactive” in the sense that each event within the sequence is in part a reaction to temporally antecedent events. Thus each step in the chain is “dependent” on prior steps. … For a reactive sequence to follow a specifically path-dependent trajectory, as opposed to representing simply a sequence of causally connected events, the historical event that sets the chain in motion must have properties of contingency. Furthermore, the overall event chain itself must be marked by processes of “inherent sequentiality.”

Mahoney cites Isaac, Street, and Knapp’s (1994) argument about the connection between Martin Luther King, Jr.’s assassination and the expansion of race-based poor relief as a paradigmatic example. According to their perspective, an unpredicted, contingent event such as King’s assassination resulted in the failure of the Poor People’s Campaign, which itself led to summer riots, which then generated welfare militancy, which ultimately increase pressure for expanded AFDC rolls (Mahoney 2000: 526).

As useful as path dependence theorizing has been at clarifying terms, Pierson and Mahoney’s definitions erect high hurdles for researchers who wish to label their explanations path dependent. In large part, this has been to prevent the concept from being stretched to the point where any argument about the past falls under the rubric of path dependence. Nevertheless, it is not clear that scholars concerned with the systematic influence of institutions over time need adhere to such a strict definition. Without participating in the watering down of path dependence, it is possible to explore other avenues of “path development”\(^6\) that have some of the important characteristics of path

dependence without necessarily having each of them. Such an approach remains analytical and theoretical, in as much as it looks for systematic connections across time and space (a standard social scientific endeavor) rather than staking out a position that everything is contingent or that no two situations are alike (arguments more often associated with post-structuralism or the discipline of history).

In particular, it is useful to focus on applications of path theorizing that preserve a role for the consequences of historical choices, but that are not limited to sequences that begin with a contingent event. Fortunately, there are some models available. Margaret Weir and Theda Skocpol (1985) stress the importance of prior decisions on current politics by focusing on what they call policy legacies and state capacities. The crucial insights here are that the organization of state institutions and existing policies form a web that informs and constrains future choices. This parallels the insights offered by the increasing returns branch of path dependency theory, in that it suggests that political choices do not occur in a vacuum, but rather in a preexisting and meaningful political context. As applied to the topic at hand, this suggests that we must examine whether integration institutions established in Britain and France in the post-war era developed out of colonial institutions or simply extended the types of policies established to manage ethnic difference in the respective empires to the home country. Are there obvious continuities in the way each country dealt with issues of citizenship, race, immigration, voting, schooling, and employment of minorities in the colonies and at home? Did officials and ministries designated to run the colonies transfer their energies to integration, once the heyday of decolonization was over?

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7 For this insight, they give credit to Hugh Heclo (1974).
Another path-sensitive effect of history to be explored when examining the institutional connections between the colonial and post-war eras draws inspiration from the notion of reactive sequences. Perhaps some of the integration policies and practices developed as a reaction to previous decisions about the colonies, or due to the effects of earlier policies. In this case, the original institutions—in this case, colonial ones—may not have been contingent in the fashion stressed by Mahoney, yet they nonetheless may have directly produced the reaction encoded into each country’s integration policies. We must therefore comb the historical record for examples of such “reactive decisions.”

Finally, there is a mode of institutional influence that goes beyond those discussed by theorists of path dependence. Scholars such as Frank Dobbin and Yasemin Soysal have argued that new institutions may take their shape due to a process of “model transfer” from institutions in other spheres formulated during earlier eras. These authors employ a definition of institutions that is somewhat less concrete than those alluded to above, in that Dobbin and Soysal analyze the ensemble of norms and structures that dominate a policy sphere, rather than limiting their inquiry to particular policies or state structures. For example, Dobbin (1994: 3) asserts that basic differences in industrial policy between Britain, France, and the United States can be attributed to similar differences in their political culture:

Most analysts have taken the parallels between political culture and industrial culture for granted, but I contend that they contain the secret to cross-national policy variation. My contention is that different conceptions of industrial efficiency originated in the traditions of political life. As modern industrial policies were devised, extant principles of social and political order were generalized to the economic sphere.

According to Dobbin, the model of political culture was transferred to the new realm of industrial policy as it developed in the early to mid-1800s. In a similar vein, Soysal
argues that variation in incorporation regimes across Europe can be attributed to “the conceptual and organizational configuration of the political order within which states frame their action” (1994: 35). In short, pre-existing institutional configurations helped to shape new ones. This is not, however, because of the increasing returns of policy legacies or state capacities, nor is it due to a reaction against past events or choices. Rather it is because the intellectual model that sustained the original set of institutions was transferred and applied to the new set.

The difficulty in applying these insights to the study of any concrete case, however, lies in developing standards of evidence that serve to support or to refute the hypothesis of model transfer. In other words, it is not sufficient to note that there are similarities across policy spheres or across time to conclude that model transfer has occurred. In examining the potential connection between models of colonial management and models of integration, we must ask several questions. First, how coherent were the models in the era of colonization and decolonization, and how coherent are the models of integration in the post-war era? If we find significant internal variation or fluctuations over time within the models, hypotheses of model transfer become more difficult to sustain. Second, to the extent that there are consistencies across time (between colonial and integration policies) within each country, what are the causes of this continuity? If it is due to model transfer, we are likely to observe politicians, bureaucrats and political leaders speaking about the institutional logic of each era in similar terms. If decision makers in the field of integration are making constant (and believable) references back to colonial institutions as their guides for action, the argument for model transfer becomes even more
convincing. If they are not, then perhaps the model is being transferred from another source, or perhaps the similarities are merely coincidental.

II. Continuity through Policy Legacies and State Capacities

The continuities between colonial and integration institutions in Britain and France are powerful in a few very significant domains, but weak or non-existent in others. Immigration and citizenship policies stand out as spheres in which policies designed—at least in part—to manage colonial relationships continued to impact the integration of minorities in the mother countries. As Randall Hansen (forthcoming) has argued most clearly, definitions of citizenship designed to encourage close ties between the metropole and its colonies were inclusive enough to spur post-war immigration (see also Freeman 1979). Until 1962 in Britain, for example, members of Commonwealth countries had unfettered access to British soil. Once in the United Kingdom, these West Indian, South Asian or other Commonwealth immigrants took full part in the rights and responsibilities of British citizens, including the right to work, the right to vote and the right to access the welfare state.

In a similar vein, in the aftermath of the Second World War, France granted formal citizenship to all Algerians (including Muslims) as the final logical outcome of its claim that Algeria was an integral part of France (Weil 1991: 64). While this step was taken in the context of colonial considerations, it had lasting effects on issues of integration. After the 1962 Evian Accords ended the war of decolonization, individuals born in Algeria prior to independence were eligible for French citizenship. Moreover, even if they chose

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8 Very few colonial subjects immigrated prior to 1948, when the British Nationality Act formally instituted equal citizenship for the United Kingdom and the colonies.
Algerian citizenship, their children born on French soil (a number that runs to the hundreds of thousands) were automatically granted French citizenship and did not have to wait for the third generation, as is customary in the nation’s laws (Brubaker 1992: 139-42; Hansen forthcoming). These laws of citizenship and immigration, established to deal with the colonies, had a lasting effect on integration in the metropoles themselves.

That said, a caveat is in order. Although the citizenship and immigration policies established for the colonies had a tremendous impact on integration, they did so in ways different from those identified by theorists of policy legacies. Typical arguments about increasing returns focus on a certain amount of policy “lock-in.” In the cases examined here, it is true that both countries maintained citizenship rights for people captured by the laws in the early post-war decades. In that sense, there was continuity across time. As great an impact as these laws have had on the possibilities for integration of millions of individuals in each nation, however, it must be noted that neither the citizenship nor the immigration policies themselves stood the test of time. Each was altered substantially, a fact that undercuts the argument that the policies were truly “locked in.” Here, it is useful to distinguish policy legacies (policies that remain over time) from the legacies of policies (their effects). Overall, it is important to bear in mind that these were important domains of limited policy continuity, but that integration policies in other areas—such as anti-racism, education, employment, health care, housing, voting, etc.—did not exhibit strong similarities to colonial policies.

If policy legacies were not direct connectors between colonial and integration policies, the legacies of policies are sometimes referred to as policy feedback (see Pierson 1993).
institutions, what was the effect of state capacities? Is it the case that structures set up to help manage civil, social, political, or cultural affairs in the colonies were adapted to deal with the integration of colonial immigrants in Britain and France? Surprisingly, there is little evidence that integration institutions in the post-war era were direct extensions of colonial structures. In the 1940s, the British Colonial Office had a small welfare department that took responsibility for the problems faced by colonial immigrants (Patterson 1969: 114). This seems like a natural pattern that could have become the norm for managing integration concerns. This path was not followed, however, and the office was closed in 1951 (Patterson 1969: 114). Instead, in the 1950s and 1960s, each country established integration organizations de novo, such as the Commonwealth Immigrants Advisory Committee (CIAC) and the National Committee for Commonwealth Immigrants (NCCI) in Britain and the Fonds d’Action Sociale pour les Travailleurs Immigrés et leur Famille (FAS)\textsuperscript{10} and SONACOTRA in France (see Patterson 1969; Silver 1993; Weil 1991). Although these organizations were initially intended to deal with problems associated with colonial immigration (as opposed to other sorts of immigration), they had no historical basis in the colonies themselves. Colonial offices and colonial institutions on the whole failed to expand into the area of integration, and ultimately withered in the aftermath of decolonization.

III. Discontinuities through Reactive Decisions

To understand the connection between colonial and integration institutions in Britain and France, we must look not only to the continuities across time, but also to the

\textsuperscript{10} The mandate of the organization when initially formed in 1958 was to construct housing for “Muslim workers in the metropole and their families” (Silver 1993: 493). As the domain of the institution was expanded, the name was shortened to simply the Fonds d’Action Sociale.
discontinuities. Can integration structures or policies be attributed to reactions against those employed to manage colonial relations? In the most straightforward of scenarios, we might imagine that anti-racism laws and policies in each country came about as a rejection of institutionalized racism in the colonies. In fact, cases of such direct causation are rare. However, several important decisions in the field of immigration, citizenship, and race relations were taken as reactions to the consequences of colonial institutions.

The continuities in liberal immigration and citizenship policies of the early post-war era resulted in the influx of hundreds of thousands of immigrants from the colonies. Borrowing Mill’s terminology, it is clear that these raw numbers were never a sufficient explanation of the subsequent integration institutions, yet they were a necessary condition for much that followed. As a response to the numbers of migrants, for example, Britain and France set up advisory bodies (such as the CIAC and NCCI in Britain) and administrative agencies (such as the FAS and SONACOTRA in France) to deal with issues of integration—bodies that were not deemed necessary in earlier eras of lower numbers of colonial immigrants. Moreover, the pressures that the new arrivals placed on the welfare state helped to generate policy initiatives such as Britain’s Local Government Act of 1966, whose Section 11 provided money for schools that had to hire additional staff “due to the presence of Commonwealth immigrants having a different language or culture from the rest of the community” (Rose 1969: 346).

Pursuing this logic, it may seem that every integration policy decision has been (at least in part) a reaction to the demographic changes of the post-war era. However, this is

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11 Here I use the term colonies to refer to current or former colonies as well as possessions such as Algeria deemed to be part of the state, yet destined to be future former colonies. For data on migration flows see Hansen (2000) and the annexes in Weil (1995).
not so. Although Britain’s anti-racist laws were passed with Commonwealth immigrants in mind, France’s cornerstone legislation of 1972 was inspired principally by a perceived resurgence of anti-Semitism in the aftermath of World War Two (MRAP 1984), and was passed prior to the wave of anti-immigrant violence that shocked the country in 1973 as well as before the economic slow-down caused by the oil crisis of that same year. In short, although the anti-racist law was important in the context of integration policies, it was not a direct response to post-colonial immigration.¹²

Arguments about reactive decisions are at their strongest when the links between colonial and integration institutions are very tight. In other words, at some point it is simply unenlightening to trace back integration policies to colonial policies just because there are large number of immigrants in a country. Of most interest and relevance are institutional changes that are direct (and usually acknowledged) reactions to colonial policies or structures. Decisions in the spheres of immigration and citizenship most clearly fall into this category in both countries.

Britain did not immediately close down entry once colonial migrants began to arrive on its shores in the late 1940s, yet there can be no doubt that the restrictive 1962 Commonwealth Immigrants Act was enacted in large measure as a backlash against the recent arrivals (see Hansen 2000; Layton-Henry 1992). Ironically, the policy continuity of a liberal immigration and citizenship regime generated an effect (large numbers of migrants) that in turn generated a policy discontinuity through a reactive decision.¹³

Moreover, because the newly elected Labour Government decided to maintain

¹² For an elaboration of this argument, see Bleich (2000).
¹³ Other factors undoubtedly also played a role in the decision to restrict immigration from the Commonwealth and thus effectively to restrict access to full British citizenship.
immigration restrictions in 1965, it passed a liberal Race Relations Act as part of what Home Secretary Frank Soskice referred to as a “package deal” to “integrate coloured immigrants.” Member of Parliament Roy Hattersley summed up the connection between the two decisions with the aphorism “Without integration, limitation is inexcusable; without limitation, integration is impossible” (quoted in Rose 1969: 229).

This progression from open immigration, to large influxes of colonial migrants, to restrictive immigration policies, to liberal integration policies thus evinces the tight links and “inherent sequentiality” that marks a paradigmatic reactive sequence.

In a similar fashion, French decolonization in Algeria left open the doors to large scale immigration even after the 1962 Evian Accords codified the independence of Algeria. In order to allow those who fought on the French side to leave the country, France maintained open borders with its former colony. This generated the migration of hundreds of thousands of individuals over the following half-decade, many of whom were fleeing the economic fallout of the eight-year independence struggle. In response to this situation, France pressured Algeria into accepting restrictions on trans-Mediterranean migration, limiting the annual number of workers to 35,000 in 1968 and capping it at 25,000 in 1971 (see Weil 1991). While this situation is not as sudden or as transformative as the British scenario, there is a clear connection between open borders, significant migration, and restrictive immigration policies. The missing link, at least in research thus far, is an acknowledged tie between immigration and integration.

Citizenship policies are one arena in which there is a clearer line connecting colonial policies and integration institutions. According to Rogers Brubaker (1992: chapter 7), the fact that children of individuals born in Algeria prior to decolonization were

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automatically considered French at birth if born on French soil (as opposed to simply being eligible for citizenship at 18, as would be the case if their parents were not born in what was considered—until Algerian independence in 1962—France) sparked heated debates beginning in the late 1970s, which in turn resulted in pressure for policy changes in the 1980s and 1990s. Many of these second-generation immigrants (not to mention the Algerian state) did not want French citizenship ascribed to them. Yet since they lived in France, the state was unwilling to release them from citizenship and required of them significant duties, such as military service. This post-colonial institutional quirk resulted in the signing of an agreement between France and Algeria in 1984 allowing dual nationals to perform their military service in only one country. It also helped to spark a debate about citizenship and integration that hit crescendos in the late 1980s, early 1990s, and late 1990s, when rules governing access to citizenship were discussed and/or altered (Brubaker 1992; Feldblum 1999). In this case, a legacy of colonization intersected with pre-existing rules on citizenship to generate an anomalous legal status that sparked a debate and a change in that status. Moreover, the entire process was framed as a debate about integration and national cohesion.

On the whole, it is safe to say that a few important integration institutions came about in part due to reactions against the effects of colonial or decolonization policies. It is interesting to note, however, that the relationship was seldom direct. Integration policy changes were more likely to be generated by the significant numbers of migrants, who were seen to put pressures on domestic welfare state structures, or to challenge a sense of national identity. Nor were the legacies of past institutions sufficient causes of many of the policy changes, since to comprehend the decisions we also need to account for factors
like pre-existing citizenship laws and the prevailing socio-economic context in each
country. Nevertheless, in certain cases, the connection between colonial or
decolonization institutions, their consequences, and integration policy decisions are
indeed tight enough to be understood as reactive sequences.

IV. Model Transfer

The third prospective link between institutions across time and place consists of a transfer
of colonial models to matters of integration. Such a tie has been posited by a variety of
scholars, such as Christian Joppke (1999: 224-25):

Britain’s readiness to acknowledge immigrants as ethnic minorities has deep historical roots. … British
citizenhood was elastic, or indeterminate, enough to live with groups set apart by ethnicity or race.
More concretely, the empire provided a pluralistic model for dealing with postimperial immigrants. If
imperial France had tried to assimilate her colonies, imperial Britain never had such pretensions. …
When the ‘natives’ moved from the periphery into the center of empire, there was no presumption of
their becoming ‘British’ or ‘English’ in any way.

By contrast, the French integration model is often seen as among the most assimilationist
available, far more so than the British, German, or even American models (Schnapper
1992; Todd 1994). Emmanuel Todd (1994: 386) asserts that “France is protected from a
racialization of social life by an a priori belief in the equality of men, inscribed in an
anthropological system the heart of which is egalitarian.” Egalitarian assimilation of
immigrants is seen by many to bear a striking resemblance to France’s colonial mission
civilatrice—the civilizing mission that provided the possibility of turning colonial
subjects into Frenchmen (see Conklin 1997).

Typically, model transfer statements are framed in broad terms. However, at least
one author argues for a direct and specific tie between an element of colonial institutions
and British integration structures. “A key feature of classic colonial patterns of social
control—indirect rule through a broker, native leadership—has been replicated in the mother country,” argues Katznelson (1976: 176-77). He contends that the 1965 Government White Paper, by setting up the NCCI, established structures that would manage minorities while keeping them at arm’s length. In this case, the perceived structural similarities between the colonies and the metropole are not due to straightforward policy continuity or to established state capacities, but rather to an institutional transfer from the domain of colonial management to that of immigrant integration.

Assessing model transfer arguments generates a number of challenges. Undoubtedly, there are similarities between colonial and integration institutions across time in each country. Nevertheless, it would be wrong to conclude from this observation that model transfer has occurred. To what extent can we call such a process model transfer, for example, if the colonial and integration “models” have limited coherence over time or place? Even if the colonial and integration institutions are arguably coherent, what are the vectors that transmit the models from one place and time to another? To be certain that there is a relationship between the colonial and integration institutions, it is necessary to specify precisely how the models were transferred. Moreover, it is important to attend to the possibility that the similarities between the eras are merely incidental. It is conceivable, for example, that the same forces that explain a country’s colonial model also—and independently—account for its integration institutions.

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15 Favell (1998: 225) strikes a similar note when he writes, “Short of really substantive political rights and recognition, the ethnic minorities in Britain—as they were in the former colonies—are given enough to keep them happy in terms of trivial localized autonomy and self-rule, while doing nothing to assure their full participation in the liberal-democratic political system.”
Scrutinizing the colonial models reveals that there were many more similarities in British and French organization and administration of their colonies than often assumed. It is frequently asserted that Britain favored indirect rule and preservation of cultural and social differences among the natives in order to govern efficiently, whereas France embarked upon a civilizing mission, using direct rule and favoring assimilation of its subjects in order to bring them French language, culture, and sophistication.\(^{16}\) This dichotomy is in part valid, but only at certain times and in certain places. For example, French rule in the *vieilles colonies* (Guyane, Guadeloupe, Martinique, and Réunion), Senegal, and Algeria did involve heavy elements of assimilationism, especially from the mid-19\(^{th}\) century onward, when citizenship rights were extended to all inhabitants (with the notable exception of Muslims in Algeria) (Fieldhouse 1981: 36; von Albertini and Wirz 1982: 258). The British, too, conformed to the model of indirect rule in much of Africa, following Governor-General of Nigeria Lord Lugard’s notion that it was a system that “met the need to rule broad areas with millions of subjects of diverse races and levels of development with the least possible outlay and a minimum of British personnel” (von Albertini and Wirz 1982: 309; see also Wallerstein 1961: 41).

However, it is not difficult to find examples of British policies that resembled direct rule, or of French policies that reflected indirect rule.\(^{17}\) For instance, one can observe important elements of direct rule in British colonial administrations in India, Ceylon, Burma, South Africa, parts of West Africa including Sierra Leone and Gambia, and in the

\(^{16}\) Indirect rule has been summarized by Wallerstein (1961: 40-41) as “leaving in place the traditional system and often the traditional ruler, and operating as much as possible through that system,” whereas direct rule implies “a rational bureaucratic hierarchy with all officials operating on a state payroll and within a single judicial framework.”

\(^{17}\) Portions of this paragraph and the following one were first written by my research assistant Jill Parsons in a memo on the role of direct rule in British and French colonialism.
West Indies (Fieldhouse 1981: 33). One expert in the field goes so far as to call India the “classic example of direct rule” (Fieldhouse 1981: 32). In 1858, the Crown officially took over Indian administration from the British East India Company. The Secretary of State for India became the “de facto Indian minister” and was responsible, along with the viceroy who was appointed by Parliament, for the development of Indian laws and legislative powers (von Albertini and Wirz 1982: 13). Thus, the viceroy was “in fact, subordinate to cabinet and Parliament,” so that the hierarchy of power flowed from the Secretary of State, as an extension of the British will, to the Governor General; to the viceroy; to the district officers, who were responsible for the tax collection and maintenance of law, order, schools, roads, and hospitals within the basic administrative unit, the district (von Albertini and Wirz 1982: 14-15). Such a chain of command echoes the philosophy of direct rule more typically associated with French colonization.

Moreover, in many ways the British shared the notion of a civilizing mission with the French, letting themselves be guided by the idea that “less favored races needed supervision by advanced peoples in order to proceed to higher levels of civilization” (Heussler 1971: 574).

Conversely, there was a move in the late 19th and early 20th century away from policies of assimilation and direct rule in the French colonies. By 1892, colonial policy objectives in Algeria that were geared towards subordinating the administration to Parisian ministries were “abandoned in favour of a combination of parliamentary representation and local autonomy” (von Albertini 1982: 386). Even more dramatic was the growing popularity among French governors and colonial officers of the idea that “French rule could be established more smoothly if one tried to win the co-operation of
the inhabitants, built on existing institutions and applied civilizing pressures slowly and ‘indirectly’” (von Albertini 1982: 286). In practice, the French policy of assimilation, signified by the granting of French citizenship to inhabitants in Senegal, Algeria, and the vieilles colonies, was not employed outside of those regions. Under the direction of the Colonial Ministry that was established in 1894, naturalization in French West Africa, French Equatorial Africa, Madagascar, and Indochina was not readily obtained.\textsuperscript{18}

Assimilation as a policy of converting natives into full fledged French citizens was rare in most French colonies as demonstrated by the fact that in 1936 there were fewer than 2,500 native citizens among the 15,000,000 inhabitants of French West Africa outside of Senegal (von Albertini 1982: 289). Moreover, when setting up school systems in Indochina in the interwar period, French Governor-General Albert Sarraut decided that instruction was to be exclusively in Vietnamese, a policy clearly not in keeping with the theory of assimilation (von Albertini and Wirz 1982: 212).

If British and French colonial models were more similar than usually portrayed, the same is true for integration institutions. As we have seen, France’s integration structures are typically characterized as assimilationist and centralized, whereas Britain’s are contrasted as multicultural and decentralized (Favell 1998; Todd 1994). And, of course, there is evidence to support this view. France has never recognized individuals according to racial criteria, and has shied away from crafting any integration policies that direct money or support to ethnic groups (Bleich 2000). Moreover, for the majority of the post-war era, its primary integration institution, the Fonds d’Action Sociale, was a centralized

\textsuperscript{18} Naturalization was “theoretically open to every native, but it had to be requested from the administration and was subject to a number of conditions: knowledge of the French language, conclusion of military service, etc. and above all it meant the renunciation of the applicant’s personal status and his subordination to French law” (von Albertini 1982: 279).
organization that gave relatively little leeway to local governments to craft their own integration policies (Silver 1993). Britain’s national-level integration bureaucracies such as the CIAC and the NCCI were relatively short lived (they did not survive the 1960s) and were designed primarily to assist local jurisdictions in formulating their responses to problems of in-migration. In addition, Britain has accepted the counting and categorizing of its citizens by race and ethnicity, a policy that was finally enshrined in the 1991 census (Coleman and Salt 1996; Peach 1996).

Nevertheless, there has been a substantial amount of subtlety, internal debate, and shifting policies within each country’s integration institutions. Although Home Secretary Roy Jenkins’ 1966 invocation that integration should be defined “not as a flattening process of assimilation but as equal opportunity, accompanied by cultural diversity, in an atmosphere of mutual tolerance” (cited in Joppke 1999: 225) is often touted as evidence of the prevailing British approach, it must be remembered that his statement is memorable principally because it marked a significant change from the attitudes that dominated integration debates until that time. In the early 1960s, government-sponsored groups such as the CIAC were concerned with “the role of the education system in bringing about the cultural assimilation of immigrant children into ‘British life’” (Tomlinson 1983: 16). Merely a year before Jenkins’ speech, a Labour party spokesman publicly suggested that “‘only immigrants most likely to be assimilated into national life’ should be permitted to stay in Britain” (see also Patterson 1969: 108-114; Tomlinson 1983: 12). Similar themes of monoculturalism and assimilation later resurfaced under the leadership of Margaret Thatcher and her Education Secretary Keith Joseph in the early 1980s (Tomlinson 1990).
Just as Britain has not always toed the multicultural line, so has France wavered from its assimilationist path. Compare, for example, Jenkins’ statement above with one advanced by France’s High Council on Integration (Haut Conseil à l'Intégration 1991: 18) to describe the basic French philosophy:

...it is a question of evoking the active participation of different and various elements in the national society, while at the same time accepting the maintenance of cultural, social and moral specificities and taking for granted that the whole is enriched by this variety, this complexity. Without denying differences, knowing how to take them into account without exalting them, a policy of integration accents similarities and convergence...

Such a balancing act between unity and diversity can be seen in French policies as well as in its rhetoric. In the 1980s and 1990s, just as the nation was undergoing passionate debates about the value of French citizenship and identity, political leaders were seeking to cultivate Muslim interlocutors that could represent the community’s interests vis-à-vis the government (Roy 1994). In addition, in the early 1980s the FAS underwent a reform that not only decentralized integration policymaking power to the regions, but also invited immigrant organization representatives to participate in the institution’s governing body (Silver 1993: 499). These steps are certainly not in keeping with France’s assimilationist reputation.

In assessing the coherence of colonial and integration models, it becomes clear that Britain and France are not polar opposites on a spectrum with indirect rule and recognition of racial and cultural differences at one end and direct rule and assimilation at the other. In fact, the picture is much more complicated, as each country has exhibited aspects of both strategies in its colonial and integration structures. On balance, it is safe to say that the two countries are closer to the middle of the spectrum than the edges, but it is true that France has more explicitly favored assimilation with respect to its colonies.
and its integration policies than has Britain. However, contra Katznelson (1976) and others, Britain has certainly not developed structures of indirect rule within Britain by granting substantial powers to minorities to govern themselves. Moreover, until the 1960s, British integration policies were fundamentally assimilationist, conferring upon immigrants full equality to native Britons. On the whole, therefore, it is correct to conclude that there are some basic parallels between colonial and integration models, provided that numerous exceptions are accounted for and that the parallels are not overstated.

This said, is it true that the similarities between integration and colonial philosophies and institutions are due to model transfer? To answer this question, it is necessary to develop a sense of the micro-processes that may link one model to another. So far, theorists of model transfer have not fully specified such mechanisms, nor have they exhaustively pursued evidence that would add credence to their arguments. The best reason for this is that such processes are usually quite difficult to track. Model transfer may occur because policy experts from one domain transfer into another, bringing with them notions of institutional organization or best practice policies. For example, it may have been the case that Colonial Office ministers or bureaucrats—having lost their jobs after decolonization—were moved to departments that dealt with integration, and thus fashioned integration institutions with colonial models in mind. Freeman (1979: 41-42) and Hansen (2000) emphasize that individuals with colonial careers did involve themselves in debates about immigration policies in the post-war era, even if they were eventually on the losing side of these fights. Nevertheless, the few lists of colonial and integration officials available (Ashton and Stockwell 1996: xix-xxii; Hyam and Louis
2000: xiii-xvi; Patterson 1969: 116-30) do not reveal a substantial influx of officials from one domain to another, and colonial bureaucrats had surprisingly little direct impact on integration policymaking.\textsuperscript{19}

The absence of this desirable smoking gun does not mean that there was no model transfer. It means, however, that researchers must fall back on speculating about socialization mechanisms that may have influenced policymakers with or without their conscious knowledge. For example, school textbooks might have been a source for individuals’ learning about colonial models of managing ethnic difference that imbued future integration policymakers with a sense of appropriate institutions. There may have been a broad political culture or a narrow “corporate” or “bureaucratic” culture encouraging policymakers to follow a certain template. Although there was not a large transfer of personnel from colonial administrations to integration institutions, many policymakers and politicians concerned with integration undoubtedly had experiences traveling in the colonies, or knew people who had visited overseas holdings. In addition, the media and popular literature conveyed the colonial model back to the metropole, providing yet another possible means of model transfer.

While each of these transmission scenarios is plausible, without a Herculean effort—and perhaps even with one—it is difficult to identify any concrete vectors of model transfer in this particular case. In short, model transfer remains a possible link between colonial to integration institutions (to the extent that they do resemble one another within each country), yet there is little hard proof that it took place. What we do know about the

\textsuperscript{19} Even where there is overlap, it is not necessarily the case that the lessons of colonial institutions weighed heavily on integration policy decisions. For example, René Pleven was Minister of the Colonies in the mid-1940s and then was the Minister of Justice for passage of the anti-racism law of 1972. But it is not clear that how the colonies were run in the 1940s had any bearing on the mind-set of Pleven by the 1970s.
initial stages of integration policy formulation implies that the process resembled more
closely a garbage-can model of hodge-podge policymaking (Cohen, March, and Olsen
1972; Kingdon 1995) than any carefully planned institutional modeling or lesson-drawing
(Rose 1993), raising further doubts about the directness of model transfer.

We know so far that integration institutions in some ways resemble colonial
institutions. However, we do not know whether colonial institutions caused integration
institutions, or whether both were caused by a third factor, rendering the relationship
between the two coincidental or spurious. What prevailing ideas informed each country’s
colonial model, and did those prior templates also influence integration institutions
independently of colonial legacies? When Frank Dobbin and Yasemin Soysal trace the
causes of burgeoning industrial policy and incorporation regimes, they look to “extant
principles of social and political order” (Dobbin 1994: 3) and to “institutionalized
resources and understandings of membership” (Soysal 1994: 4) that date back hundreds
of years and that presumably shape all major political choices within a country. Is it the
case that such deeply rooted domestic institutional models were an independent cause of
both colonial and integration institutions?

In the French case, there is substantial evidence that Revolutionary and Republican
principles had a large influence on both colonial and integration models. The egalitarian
and assimilationist bent of 18th and 19th century France is, of course, well known
(Brubaker 1992; Weber 1976). More important from the perspective of this paper,
however, is whether integration policy leaders have consciously drawn on these
principles when formulating their institutions. In fact, they have. When the High

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20 Didier Lapeyronnie (1993: 129-33) also raises this question.
21 Even if it must not be oversimplified or overstated.
Council on Integration (Haut Conseil à l'Intégration 1991: 19) spelled out the French integration logic, it insisted that “the identitarian and egalitarian principles which stretch back to the Revolution and to the Declaration of the Rights of Man and of the Citizen impregnate our conception, founded thus on the equality of individuals before the law, whatever their origins, their race, their religion … to the exclusion of an institutional recognition of minorities.” Interviews with high-level integration policymakers confirm that when French leaders look to the past for institutional models, they tend to mention the Revolution and the Republic (and the anti-model of Vichy), and not the colonies.

The British case is less clear. It is possible that the multi-nation United Kingdom found it more natural than the centralizing power of France to devolve authority to native rulers. However, we have seen that the use of indirect rule was not ubiquitous in the colonies, nor was it undertaken for philosophical reasons, nor was it replicated for colonial immigrants in the metropole. It is also tempting to conclude that recognition of racial and ethnic difference (and the institutionalization of such recognition in British censuses and laws) was handed down from liberal and pluralist models of social organization that date back centuries. Here, too, however, it is valuable to recall that during the early stages of colonial immigration into Britain, official policy was race-blind and even assimilationist. Embracing multiculturalism was a decades-long and sometimes painful process that was spurred more by looking to the North American model than to any domestic historical examples, colonial or otherwise (Lester and Bindman 1972; Rose 1969).

In sum, it might be the case that the similarities between integration and colonial institutions in each country are the result of model transfer from one arena to another. A
close examination of the cases, however, reveals little direct evidence that can be marshaled in favor of this argument, and many challenges that can be posed to it. It is simply not true, for example, that colonial or integration “models” were coherent, well-maintained sets of institutions either in Britain or in France. There were some general tendencies in each case, but there were also numerous contradictions over space and time. In addition, there is little to no direct evidence—thus far—of a “smoking gun” connecting colonial to integration policies. There are plausible paths of influence between the two policy arenas, but little systematic work has been undertaken to stitch together the spheres. Finally, there is grist to argue that the commonalities between colonial and integration models within each nation are coincidental more than causal. To the extent that model transfer mattered relative to other causal factors, much of France’s integration institutions reflect Revolutionary and Republican legacies, not colonial legacies. And although the British case is murkier, it is certainly true that important elements of its policies—such as devolution of power to local authorities and race-conscious elements—are due to factors that have little relation to its colonial past.

**Conclusions**

The institutional effects of colonization and decolonization on integration are fewer and less direct than sometimes presumed. Most significantly, open immigration and citizenship regimes that continued during and after decolonization had a tremendous demographic impact on Britain and France. This policy continuity generated reactions that eventually curtailed these liberal institutions. New restrictions in citizenship and

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22 Scholars such as Gary Freeman (1979: 20-42) and Didier Lapeyronnie (1993: 129-33) have also raised questions about the extent and form of colonial legacies.
immigration spheres themselves occasionally led to inclusive integration policies, such as Britain’s 1965 Race Relations Act. Somewhat more independent of colonial institutions, demographic changes also spurred new integration institutions (France’s FAS, Britain’s NCCI) and policy initiatives designed to help ease the pressures on the welfare state. And in spite of a popular presumption, it does not appear obvious that integration institutions were straightforward models of colonial ones.

All of this points to the fact that it might be fruitful to revise the way we think about the institutional legacies of colonization and decolonization on integration in contemporary Britain and France. This paper has argued that the links are less direct and less clear than many assume. However, this does not mean that it is possible to say with certainty that they are unimportant. Using the social science theoretical framework for examining history highlights types of connections between the past and the present that may have, to date, been overlooked or oversimplified. There are certainly realms of policy continuity and policy reaction linking the colonies and integration that have yet to be discovered. In addition, breaking down the logic of model transfer demonstrates the difficulty of making such an argument persuasively, but not the hopelessness of doing so. To decide whether and how much model transfer mattered in this case will require much more historical leg-work and empirical evidence.

Perhaps in the end this paper serves to highlight another question altogether: why have colonial and decolonization institutions seemingly had so little impact on integration in these two countries? Although it cannot be concluded that there was no effect, most observers tend to assume a much greater effect than can be supported by the evidence. One possible explanation has to do with the ways that integration concerns have been
framed in each country’s domestic politics. Issues of integration have been cast as problems of newcomers who need help with jobs, housing, social services and language training. They have been interpreted as challenges to national identity or as competition for resources that have generated significant political backlash. Rarely, however, have they been framed as problems of managing a subjugated population, or of extracting resources and national power from strange people in strange lands. Even when the colonial and integration issues were framed in relatively similar ways—managing ethnic diversity—post-war integration policymakers rarely seemed to look back to the colonies for lessons, preferring instead to model their institutions on domestic history (such as the French Revolution and Republican experiences) or even on foreign overseas experiences (such as the British use—and adaptation—of the American model). Just why integration policymakers framed their issue area in these ways is a topic for further research and debate.
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