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**French and British models
of integration
Public philosophies, policies
and state institutions**

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Abstract

French and British integration policies have for a long time formed two mutually exclusive paradigms. Built on elements of the ideology introduced during the French Revolution, French citizenship is perceived as refusing any form of distinction on ethno-racial lines in the public sphere. In the eyes of this republican "philosophy", British policies have appeared to represent its antithesis with an approach based on the importance of minority groups and some recognition of multiculturalism as a social and political feature of British society. For the observer, this quick presentation of the dominant paradigms of citizenship in each country has the following consequence: "race" or "ethnicity" seem to form the hard edge between the two countries, with these concepts being rejected in France and central to the situation in Britain. Since the media, politicians and researchers have perpetuated this comparison between France and Britain, it has been set up as an insurmountable opposition between two different fixed "models". In recent years, however, we seem to have moved beyond this opposition. To make sense of this recent shift in both countries' integration policies, this paper proposes a renewed comparative approach which challenges the "mirror" image of a structural and essentialist opposition between French and British models of citizenship and integration. Also, the paper highlights key perspectives through which it is possible to envisage how far France and Britain share a common political future as globalised and multicultural societies, in spite of still largely dominant discourses focusing on the oppositions between the both nations.

Keywords

Integration policies (France/UK), Ethnicity, Citizenship, Discrimination, State institutions

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Introduction

In the 1990s, a rupture appeared in Europe between the grand national “philosophies” of citizenship on the one hand, state integration policies in relation to migrants and minorities of immigrant origin on the other. This is a new situation. It does not only concern the gap between “national philosophies” and the political responses to the presence of migrants and minorities because, in practice, every country deviates from an “integration model” claimed at an ideological level. When one deals with it in an empirical way rather than a normative one, the idea of a “model” is therefore relative.

But the rupture in question relates to something else: today, integration policies are not only justified *entirely* by referring to the traditional ideologies of “living together” within a nation but, above all, the social and political relevance of this classic ideological justification is now being *challenged* as a way of promoting integration, even by the institutions acting as guardians of national tradition in the area of citizenship. It is in this particular context that a “crisis” can be seen in the “integration models” of both France and Britain. By looking at this rupture, we must re-consider the comparison between the Republican citizenship “model”, which is based on the primacy of the individual citizen and a national political identity, and the plural citizenship “model” of Britain, where minority groups are both the subjects *of* and contributors *to* integration policy.

France and Britain: two citizenship «models»

French and British integration policies have for a long time formed two mutually exclusive paradigms. Built on elements of the ideology introduced during the French Revolution, French citizenship follows a framework of civic individualism and national modernity. Civic individualism sees the abstract individual as the only focus of rights, and refuses any form of distinction on ethno-racial lines in the public sphere, which is seen as a place where shared citizenship can flourish. National modernity, on the other hand, by lending almost monolithic sovereignty to the nation, has made national identity an affective notion to counterbalance the very abstract definition of members of the “community of citizens” (Schnapper 1994). According to this ideological system, everything that is not classed as national is seen as suspect in terms of identity. From a normative perspective, this explains why it was difficult to recognise the postcolonial social diversity in French society when immigrant workers who arrived in the 1960s and 1970s began settling for good in the 1980s, with their descendants becoming citizens with the full rights granted by the French Republic.

In the eyes of this philosophy of citizenship, British policies have appeared to represent its antithesis. Instead of using the abstract definition of the individual as a source of national citizenship, British policy has demonstrated an approach based on the importance of minority groups and has placed an emphasis on integration, not as a process of acculturation to the nation and civic values, but as a programme of equal access to the rights of British society, which itself recognises multiculturalism as a social and political feature. This “plural” form of liberalism, which came out of the imperial legacy and postcolonial immigration, placed an emphasis on fighting racial discrimination – also in the public sphere – by lending social and political influence to members of ethno-cultural minorities.

For the observer, this quick presentation of the dominant paradigms of citizenship in each country has the following consequence: “race” or “ethnicity” seem to form the hard edge between the two countries, with these concepts being rejected in France and central to the situation in Britain. Since the media, politicians and researchers have perpetuated this comparison between France and Britain, it has been set up as an insurmountable opposition between two different fixed “models”. In recent years, however, we seem to have moved beyond this opposition.

Ruptures within the “models”

In France the idea of the Republic is a discourse on the nation that is outstripped by reality, where a veil of ignorance over the issue of ethnicity has not prevented themes linked to discrimination from entering national debates. This began to happen in the late-1990s, in line with the Amsterdam Treaty (Bertossi 2007a). The 1996 annual report of the Council of State challenged the abstract approach of Republican equality and showed how the reality of discrimination in a diverse society reduced the relevance of the official programme of equality, which is at the heart of the political identity of the French Republic (Council of State 1997). In 2003, the Ministry of the Interior institutionalised Islam in France by creating the Conseil français du culte musulman (French Council of the Muslim Faith), whilst a debate began around the practice of “positive discrimination” when the “first Muslim *Préfet*” was appointed.

British race relations policy, which was formed in the 1960s, has itself been the subject of many attacks. The 2001 and 2005 riots, and the London attacks on 7 July 2005, were a serious challenge to their “model”. In a series of reports on the causes of the 2001 race riots, the Home Office turned away from a liberal approach in favour of a more civic and national approach to integration, and denounced the “refusal” of members of ethnic minorities to adhere to British identity. In 2004, the Chairman of the Commission for Racial

Equality also stressed the importance of shared civic values as a component of integration which had for too long been left out of the British “model”.

What are the ruptures?

Are we now experiencing a convergence of the two countries’ “integration models”? Is British integration policy becoming more Republican? And is French integration turning to anti-discrimination? The answers to these questions cannot be given directly. To do so, one has to better define the areas in which it is possible to find the ruptures we mentioned previously between the national philosophies of citizenship and integration policies. It is possible to pinpoint three different areas in which such ruptures are at play.

The first of these is external to the issue of “integration models”. It concerns the prior notion of the nation-state, and more specifically the crisis of the national as a sphere of shared belonging, welfare distribution, access to equal rights, mediation between institutions and citizens, a way of translating public concerns into public policy, and way of fitting power into a context of European integration, globalisation (including a greater amount of international migration) and the erosion of international borders since the end of the Cold War (including the issue of cultural and religious identities such as Islam). In other words, it is no longer possible to make sense of national citizenship in a socio-political context which is no longer that which was experienced by A.V. Dicey and Ernest Renan. One must certainly add to this crisis in the national arena the fact that, if the European integration process was, in the 1990s, perceived to be a prospect for a renewed programme of contemporary democracy, the crisis in the European Union has ended the possibility of modern citizenship being reformulated from a post-national perspective. This has considerable costs for the way in which the integration of migrants and European minorities is handled, especially when it comes to the issue of Muslims in Europe (Bertossi 2007c).

The second area of rupture is within the “integration models”, which have not “succeeded” in relation to their goals or have not been able to adapt to the changes in social and political issues which are tied to the integration of migrants and ethnic minorities. In France, the blindness of the Republic to the issue of ethnicity has never allowed people to recognise the “racial” divide which has developed in France, both by refusing to deal head-on with discrimination and the ever growing gap between state institutions and communities of immigrant origin, who are almost totally unrepresented. In Britain, whereas fighting discrimination has been the central goal of integration policy, this has not prevented antagonistic relations from developing between minorities and the police, and the under-representation of minorities in national political institutions. The most striking illustration of

this crisis of confidence in the French and British “models” is most certainly the scale of the French riots in November 2005 and the riots in Britain in 2001, and the attacks in London in July 2005, but also the impact that these events have had on public opinion in both countries.

A third rupture can be seen where the first two intersect each other, which is the consequences of the crisis of the national and the crisis of “integration models”. Whilst the principle of the national is in crisis, resistance at a national level to define citizenship in multicultural societies is still to be found in every European country, and particularly in those countries with a long history of immigration. This is increased by the crisis in the “integration models”. Migrants and ethnic and religious minorities have been identified as an explanation for this integration crisis, to which governments have responded with a return to the national. National identity is therefore being set up as a form of “common belonging” which is under threat from Islam and, at the same time, as a solution to the crisis of “common belonging”, which is particularly noticeable in the fact that themes which were traditionally held by far-Right parties have now become commonplace. This type of crisis is certainly the most important factor in the convergence of ways of dealing with issues related to the integration of migrants at a European level. This is taking place alongside another area of convergence in Europe: the communities which were the focus of integration policies on the basis of their nationality of origin (North Africans in France) or their ethnicity (Blacks and Asians in Britain), are now labelled everywhere as “Muslims”.

In short, the opposition between “national philosophies” of citizenship and integration policies is being played out in three areas: a crisis in the national, but a resurgence of nationalist discourses to make sense of solidarity within globalised, plural societies; a crisis in “integration models”, but calls from minorities of immigrant origin for full access to substantial, first-class citizenship; and a crisis, in public opinion, in the sense of “common belonging”, but the use of immigration and Islam to make sense of a global crisis whose only political response that “pays” is a return to national identity.

The consequences of a crisis in “integration models”

If it is possible to identify the ruptures inside the “models” of each country, these oppositions are ambiguous in nature. This is another aspect of their characteristics. As a result, traditional narratives about “common belonging” have not been replaced with new ideological programmes. Although the initial narratives have been challenged, they still remain a point of reference which prevents new, alternative ideological registers from being developed in order to take account of citizenship and integration. As a result, these dynamics of rupture in which the “national integration models” have been placed also create

ideological conflict within each “model”, which is based on tensions around national identity and ethno-cultural and religious diversity. The polarisation of the debate in each country has become a factor in the contradictory formation of new state integration policies.

In this way, new French anti-discrimination policies emerged at the same time that the law of 15 March 2004 banned the wearing of conspicuous religious symbols (including the hijab) in state schools. The law was adopted after debates surrounding the incompatibility between Islam and Republican values. In response to the 2001 riots, the new British agenda of community cohesion – which places an emphasis on shared values, national identity, active citizenship and civic virtue – has not resulted in the loss of race relations, but it has contributed to neutralise their very relevance as founding principles of the future of the integration of ethnic and religious minorities in Britain.

As a significant factor in these ruptures, the challenge to race relations from British state institutions has been accompanied by recognition of the fact that, in the end, the French “Republican model” might be useful for the development of new approaches to citizenship in Britain which is a multicultural and multi-faith society. Symmetrically, in France, Bernard Stasi, the President of the Commission set up by the French President to suggest reforms in the area of secularism in the education system, went to London to learn how the British authorities manage religious diversity. A recent statement given by the Haut Conseil à l’Intégration (High Council for Integration), which is the guardian of the Republican tradition in its most conservative form, focused on comparing the different policies used in other countries of the European Union (HCI 2006). Although this statement reveals all the Republican prejudices about integration policies in other countries, it nonetheless shows the importance of comparing the different national experiences to inform and inspire future French integration policies. A comparison is needed in this context not to justify differences, but to mutually enhance the ideological paradigms surrounding citizenship and the integration of minorities, which up until now have been far removed from each other.

Finally, the boundaries between the different national integration and citizenship “models” have become blurred, since they are all being faced with almost identical problems in relation to urban and ethnic segregation, unemployment, opposition to state institutions such as schools and the police, and the perceived “incivility” of ethnic and religious minorities who have been marginalised in spaces with a mixture of social and “racial” stigmas. All of this creates a shared backdrop for French and British public policy to resolve and take stock of the problem of integrating citizens of immigrant origin.

In such context, which is still in flux and where the idea of “models” is “melting away”, the aim of this paper is to go back over the development of French and British policies and national philosophies with regard to integration and citizenship, in order to allow us to measure how far they have changed.

At the same time as identifying the fundamental differences existing between the two “models”, the notion of a “model” needs to be relativised because it is mainly the result of the highly politicised nature of the themes of integration and immigration, and therefore closer to political discourse – to which academic discourse sometimes succumbs (part one). It is therefore necessary to evaluate how the differences between France and Britain have developed out of the resolution of an issue that is common to both countries: how can citizenship be turned into an instrument for the integration of communities of immigrant origin (part two)? When putting recent developments in each country in perspective, it is necessary to gauge the way in which both societies are now faced with challenges which go beyond the borders which are usually drawn between the two French and British integration paradigms. This is particularly the case in the relationship state institutions have with members of ethnic and religious minorities (part three). The aim of this paper is to allow a reasoned comparison between the philosophies, policies and state institutions of France and Britain, in order to make sense of a common programme of citizenship in globalised, multicultural societies, where France and Britain share a common political future, in spite of still largely dominant discourses focusing on the oppositions between the both nations.

I. The benefits and drawbacks of a comparison between France and Britain

Commenting on debates surrounding the integration of immigrant communities at the end of the 1980s, Philippe Lorenzo pointed out that he was “struck, when talking with English colleagues, by the fact that in France the essential problem is nationality, whereas in England it is race” (Philippe Lorenzo 1989). This contrast has remained at the heart of comparisons between France and Britain: on the one hand, there is the French Republic, the uniqueness of the individual, the importance of national identity and nationality, civic virtue and the separation of the public and private spheres; on the other hand, there is ethnicity, cultural and religious diversity, minority groups, race relations, pluralism in civil society and an apparently weak national identity. When approaching the issue of integration in France and Britain, one seems to be faced with a “mirror image” (Favell 2001: 4; Neveu 1993) which, in short, pits the “citizenship model” (France) against the “ethnicity model” (Britain).

This approach, which has slowly become entrenched in the reciprocal glances exchanged between France and Britain, has had significant effects. It has helped to maintain certain ambiguities which hinder dealing with it in a comparative way. How do we make a comparison and, above all, what are we comparing?

1.1. The drawbacks of a comparison

A comparison between France and Britain which crystallises *a priori* oppositions between two distinct “national models” presents at least three problems: it uses a discourse taken from the field of science to respond to issues that are of a different kind; it confines debate to fixed national frameworks, without recognising the shared issues that led to integration policy in each country; and it scarcely allows for any intellectual flexibility to respond to the social demands that can emerge from these issues.

When comparison becomes a justification

Leaving behind the caricature of the two models, which can be the result of such a simplistic approach that exaggerates the differences in order to construct one national paradigm against the other, the “mirror discourse” raises another, more substantial problem. This particular discourse often leaves behind the scientific discourse and places the comparison between France and Britain in a political agenda, mixing up, on the one hand, ideal types created in the social sciences with, on the other, political stereotypes constructed in debates that are often based around electioneering (Rex 2006a). This problem concerns, of course, research belonging to a perspective that is purely national, for instance in relation to the use

of the concepts of “integration” and “ethnicity”. These concepts are the focus of political debates and are therefore very ideologically loaded. They are also categories used by some researchers (Schnapper 1992; Todd 1994), but contested by others (Martiniello 1997; Bertossi 2002; Castles *et al.* 2002). Finally, they are concepts that are negotiated, adapted and used by people involved in public life, immigrant communities and minority groups, who can all play ethnic identity against Muslim identity, the recognition of ethnic and religious diversity against assimilationist discourses, and citizenship against calls to integrate from dominant society.

The comparative approach is all the more affected by these problems, since it shapes the oppositions between different “models” in order to reinforce certain normative positions which are at the heart of conflicts in the national debates of each country. In this way, French integration policy might be assumed to be racist in Britain, since it is not based on combating discrimination and it refuses to accept any “ethnic” categories. Conversely, since the 1980s, the use of the term “*communautarisme*” (communitarianism) in the French media and politics reveals a tendency to exploit the comparison with Britain in order to denounce the risk of identity groups being formed independently of the French nation, by referring to so-called “Anglo-Saxon *communautarisme*”, be it British or American. Scientific research has not been spared: it has even been based in part on this ambiguity, and has developed during a period where themes of integration and citizenship are highly politicised – and these are themes that only emerged in the 1980s in the social sciences in France and were imposed on them by the national political agenda of the time.

Occasionally, in order to better promote the French ideology of citizenship, this research has referred to experiences in other countries, particularly that of Britain. The project has therefore involved stereotyping other national integration “models” in order to lend a “saving” quality to the Republican approach at a time when debates surrounding nationality and immigration are most prominent (for example, Schnapper 1992; Todd 1994; cf. Favell 2001: 90). The example of Britain has been very present in French debates surrounding the meaning to be given to the concept of integration which people started discussing at the same time, influenced by the agenda in the areas of politics (nationality reform, 1986-93), society (the actions of immigrant organisations, 1983-86) and science (the first studies on Islam and integration: Leveau and Kepel 1985; Etienne 1989).

As for Britain, French debates surrounding citizenship have probably helped to put in perspective the response of national public policy to the immigration “problem” more so than helping to reinforce the validity of the idea of race relations. This has taken place

against a backdrop of this issue becoming highly politicised (Freeman 1979; Bleich 2003). But British research into immigration and integration has for a long time remained unreceptive to international comparison (Castles *et al.* 2002: 120). In other words, in terms of the integration of immigrant communities and ethno-cultural and religious minorities, the social sciences have been faced with a problem that is two-fold: on the one hand, the normative attack on the “other” model which diverts the comparative approach and, on the other, the national insularity of research that has given up on the comparative approach.

Breaking free from national insularity

This difficulty in making comparisons can be explained on a number of levels. Firstly, the very subject matter of the research (immigration, ethnicity, Islam) creates a great amount of sensitivity since it concerns national identity. Effectively, the scientific programme is rarely divorced from the political one with regard to such issues and the arena of debate is above all national, which on the face of it makes comparison difficult (cf. Miles 1993; Schnapper 1994, for a publication that was given an award by the French National Assembly; for the use in politics of the categories of these debates, see Guénif Souilamas *et al.* 2005).

Secondly, one probably has to look into the “sociological tradition” (Nisbet 1984), from the 19th century onwards, for the reasons why integration became an issue for the nation-state with regard to the advent of new forms of solidarity within national societies (Tönnies 1977; Durkheim 1996; Weber 1995), the outcomes of political modernity and the industrial revolution (Gellner 1983; Noiriel 1988; Turner 1993). Sociological theory, which was then in its early stages, questioned integration in these new modern and complex societies at the very moment when national identity in France and Britain was taking root and the two countries were embarking on the colonial venture.

Hence, finally, the issue of “national integration models” and the status attached to them by the social sciences. For researchers, these “models” can be interpreted in three ways. Firstly, they can be seen as “culturally formed” frameworks used to explain social questions (Brubaker 1992: 41). They can also be tackled as a model for validating certain subjects of research to the detriment of others (for example, what in France is still perceptibly difficult to do: to take “ethnicity” as a legitimate subject of research due to the Republican model of citizenship; cf. for example, Tripier 1999). Finally, they can be the very subject of scientific investigation, highlighting in particular the gap that exists between, on the one hand, the observable empirical reality and, on the other, national ideological paradigms (Neveu 1993; Lapeyronnie 1993; Silverman 1992; Schain 1999). In the first two cases, the issue of “models” reveals what is often an ambiguous relationship between the scientific sphere and the

political sphere, which very often prevents the scientific discourse from adapting to social demands, since the research also draws on the process of legitimising the subjects of public policy. The issue of statistics is at the heart of this ambiguity in France (Desrosières 1993; Simon 2002; *Le Monde* 8/03/2007).

“Translating” in order to respond to social demands

To put it another way, if one of the reasons given in the discourse of the social and political sciences is definitely to make sense of social demands and, to a certain extent, to respond to them (Rex and Moore 1967; Rose and Deakin 1969), this discourse is only valid if it succeeds in breaking free from the ideological instrumentalisation of the subjects it seeks to analyse. Since, in addition to “managing” the normative issues affecting a comparison of two countries (the Republic vs. race relations), it is necessary to “translate” not simply the studies conducted on either side of the border, but above all the terms that are prevalent in the debate in one country in such a way that makes them intelligible and relevant or legitimate in the other country. The two issues of moving beyond caricatured oppositions and translating the national contexts seem to be linked: sometimes “translation” companies are affected by the ideological influence of those defending a particular model (cf. Schnapper 1998).

This is radically connected to the issue of integration and citizenship. The questions passed to and fro across the Channel are closely related. Although they are based on different processes, the problem at the root of the ways in which the integration of minorities of immigrant origin is tackled is a common one: it relates to the relationship between diversity and cohesion, ethnicity and citizenship, cultural pluralism and the granting of rights.

British studies on citizenship from Thomas H. Marshall to Bryan Turner (1993) and Andrew Linklater (1998, 2003) largely go beyond the sole issue of ethnicity and work on national citizenship by Brian Barry (2001) and David Miller (2000), which take a very Republican line, have contributed to a British discussion of the future of race relations, particularly following the 2001 riots and the attacks in London in July 2005. On the other hand, the “issue of race” is now at the centre of political, social and intellectual works in France, particularly following the urban riots in October-November 2005, trying to make sense of diversity in social relations and the consequences of this in relation to rights and discrimination, and measuring these (Simon and Clément 2006; Fassin and Fassin 2006).

So, if these social needs continue to belong mainly to the national domain, reference to European integration reinforces attempts to compare different national solutions to integration and granting citizenship to immigrant communities (Joppke 1999; Bertossi 2007a).

The fact that the issues are being looked at at a European level (Geddes and Guiraudon 2007) is weakening the obsession with different “national models” because the questions European societies are faced with today seem to be converging, particularly in relation to Islam, within a context where international and national issues seem to be increasingly connected (Leveau, Mohsen-Finan and Wihtol de Wenden 2005). It is probable in this case that a comparison between France and Britain becomes most socially relevant, and it then becomes necessary to return to the processes which formed these two political frameworks in order to break with certain received ideas.

1.2. Nation, citizenship and integration: a common issue for France and Britain

France and Britain have experienced similar historical developments. They were the first two nation-states in history to embark on liberalism as a form of political division of labour and on the industrialisation and nationalisation of their societies. Citizenship in both countries was formed progressively around class conflict and the emergence of the welfare state. The two countries also share a comparable colonial venture, which ended with the end of Empire, where each country was faced with postcolonial migration and responded with integration policies through citizenship. It was within these similarities that differences between France and Britain, in the way in which they dealt with the integration of immigrant minorities – as well as variations in each country through different eras – became progressively structured.

Political liberalism and the modern nation

The first characteristic shared by France and Britain is probably the way in which their policies in relation to the reception and integration of migrants were established when migrants were given citizenship, unlike in other countries such as Germany and Japan (Castles 1995). This relates more generally to the place held by citizenship in the construction of the nation-state in both countries, where national identity was achieved as citizenship and voting rights were extended progressively (Marshall 1950; Leca 1990). National integration in this way did not follow distinct “communitarian” groupings, be they religious or ideological, which did happen in the Netherlands (Lipjhart 1968). In France, as in Britain, citizenship functioned as the thing which bound the nation together, and it was reinforced by institutions such as the school, organisations, unions, military service and political parties, which were real forces for national integration (Weber 1976). Adrian Favell sums it up as follows: “the two nations’ political solutions can be read as distinct applied versions of philosophical liberalism” (Favell 2001: 2).

It is within this shared political modernity that differences appeared between the two countries with regard to the way in which the relationship between citizenship and the nation was resolved. On the one hand, British parliamentarianism offered greater autonomy to certain institutions such as organisations, which have long suffered from a lesser degree of protection in France than the autonomy granted to unions under the 3rd Republic (Rosenvallon 2004: 343). On the other hand, French Jacobinism inherited from 1789 placed more emphasis on a centralised state and leant towards a direct relation between political institutions and citizens, which was a rejection of the corporatism of the Ancien Régime which had been abolished by the Le Chapelier law in 1791. This Jacobinic ideal was, however, adapted in such a way that it was transformed, at the end of the 19th century, to recognise the importance of intermediary institutions in the integration of French society (cf. Durkheim 1996 and 1999).

Another contrast relates more directly to the place of national identity within the idea of citizenship. If “Britain is the country of citizenship” (Lapeyronnie 1993: 41), France is the country whose national identity is at the core of the process of rights being conferred. In the first instance, citizenship is an issue of access to equal rights in a society that rests on public institutions and the market, whilst in the second, national identity forms “the third source of citizenship” (Habermas 1996: 21; Renaut and Mesure 2002; Patten 1995).

Rainer Bauböck summarises this divide: “for a liberal conception, in contrast with the republican tradition of Aristotle, Rousseau or Hannah Arendt, the inclusion of the inactive or even the incompetent as equal members in the polity is a basic achievement of contemporary democracy” (Bauböck 1994: 202). In Britain, T. H. Marshall’s classic definition of citizenship in the immediate post-war period falls into this liberal conception, which was inspired by the works of Lord Beveridge on social insurance (Beveridge 1942). Marshall considered the expansion of citizenship, from civil rights to political ones and then to social rights, to be a necessary condition for the working classes to transfer their class allegiances to an allegiance to national institutions (Marshall 1950). This definition of citizenship is not present in the Republican tradition which, on the other hand, posits that the ability and civic virtue of individuals is a precondition for their inclusion in the “community of citizens” (Schnapper 1994).

Colonisation and postcolonial migration

One further characteristic shared by France and Britain – the colonial venture, which is tied in both cases to a “civilising” and “universal” mission – added to the reinforcement of the nation-state and the unity of national institutions (Neveu 1993: 33; Saada 2006: 63). In

France, the universalist project was played out overseas and, even more so, in Algeria, whereas British national identity found cultural weight in “Britishness”, which was centred around the Crown (Crick 1991), whether it be for the immediate periphery (Scotland, Ireland, Wales) or the distant colonial periphery of the Commonwealth. As for the ideological differences that are often attributed to the two mother countries in relation to the management of Empire – assimilation for France and association for Britain – they are relative differences if one compares the variations in status of the various colonies within each empire (Lapeyronnie 1993: 130; on France, see Saada 2006).

In these two colonial situations, there are also elements of tension between the modern liberalism found in the metropolitan centre and the racist ideologies used in each case to justify the status of native colonial subjects (Rex 1981; Blanchard *et al.* 2005). This would have repercussions when the former colonial subjects, who had become economic migrants after World War II, were given French and British citizenship. Certainly, in France these contradictions were even more acute, due to the Jacobinic and republican ideology at the core of French identity, particularly in the context of Algeria. After being conquered in 1830 and organised as three French departments in 1848, Algeria was nonetheless divided between citizens and subjects, with the latter recognised as French nationals (from 1865), albeit without being granted active citizenship. They were given a second electoral college and only had the opportunity to become citizens if, among other conditions, they gave up their personal status as Muslims. Islam was therefore used as a cultural and political barrier, and the 1905 Laïcité law on secularism would never be applied to Algerians (Frégosi 1998).

Decolonisation did not bring these contradictions to a close, but rekindled them. If, for France, the loss of Alsace-Lorraine when she was defeated by Germany in 1871 had been the moment to elaborate a discourse focusing on the “political nation” (Renan 1992), the loss of Algeria sounded the death knell for the universalist approach at the heart of French nationalism. What is more, postcolonial immigration grew in intensity and was organised by recruitment offices in the countries of origin. After 1946, Algerians benefited from freedom of movement to the mother country. Already, “in terms of the law, immigrants are still Italian, Spanish, Polish and Portuguese; politically and socially, they are increasingly Algerian” (Weil 1991: 93). With independence, these immigrants no longer had access to French nationality, except for the Harkis and former civil servants.

As for Britain, decolonisation also had an effect on the “civilising” empire, but the liberalism applied to it offered a different solution to the management of postcolonial labour migration, which came from the “New Commonwealth” (the Caribbean, India and Pakistan). These

immigrants had, upon their arrival in Britain, access to all citizenship rights, including political rights. In contrast with France, immigrants are citizens as soon as they arrive in Britain. This has a major consequence: in France, the political activism from the 1980s onwards would focus on obtaining citizens' rights; in Britain, from the 1960s onwards, activism would have the goal of achieving equal rights for all citizens.

Citizenship and nationality

French notions of "*citoyenneté*" and "*nationalité*" are not easily translated into English since "citizenship" in English can refer equally to both and describe, on the one hand, a group of political, civil and social rights (French "*citoyenneté*") or, on the other, the way in which an individual officially belongs to a state as stipulated on one's passport (French "*nationalité*"). The rights of *nationalité* do not refer to the rights of *citoyenneté*, but to the conditions required to be granted rights according to the principles of birth (*jus soli*) or descent (*jus sanguinis*).

The distinction between the notions of "nationality" and "citizenship" is at the heart of the French conception, and paradoxically makes them more indistinguishable: the only way to achieve rights of a citizen is to officially belong to the nation, which traditionally combines *jus soli* and *jus sanguinis* in the Republican ideology of integration (Weil 2002). This mixed approach to nationality was, however, a late arrival because it was not until 1889 that French nationality reached this compromise with regard to the integration of foreigners into citizenship, after the development of what was exclusively *jus sanguinis* (1804) to *jus soli* (1831, 1851, 1857) (Noiriel 1988; Weil 2002).

It is more difficult to find the distinction between nationality and citizenship in the context of Britain, where the slow development of foreigners' rights (1905, 1914, 1919) was at first based on allegiance to the Crown, which determined belonging and united the Empire. This conception was seen again in the British Nationality Act of 1948 (Prakash 1995: 61). With the end of Empire and the migration that came with it, a gap developed between citizenship rights – which still remain – and the right to enter Britain, which has been increasingly limited (above all in 1962 and 1968).

The difference between the French context, where, in the 19th century, nationality rights became increasingly specific as they became connected progressively to citizenship rights and patriotic conceptions of the nation (Bertossi 2001: 73-82), and the British context, where the definition of a citizen was made according to colonial logic and political reactions to immigration (Dummett and Nicol 1990), can be seen today in what distinguishes the debates surrounding integration in the two countries. In France, there was an importance placed on

nationality in the 1980s as a way of absorbing foreigners, and in Britain, there was an importance placed on equal opportunities and access to institutions – including political ones – for immigrant minorities in return for a tightening of border controls.

2. Defining the politics of integration

Numerous studies have allowed these national characteristics to be placed within complex socio-historical processes, avoiding the simple “mirror image” contrast between France and Britain, and tackling themes other than national identity as a general category to be used to make sense of the differences between the two countries. These categories have included: variations in politics and institutions at a local level (Garbaye 2005); processes leading to the emergence of the welfare state and the crisis of the nation-state and its institutions (Lapeyronnie 1993); different types of social and “ethnic” activism (Rex and Drury 1994); and political responses to immigration (Geddes 1996; Layton-Henry 1992; Weil and Hansen 1999). All these have tried to identify reasons for the differences between French and British post-war integration policies.

Gary Freeman showed the different ways in which debates and immigration policy were constructed in each country (Freeman 1979). In France, immigration has been dealt with according to common law, with a purely economic perspective. The presence of migrant workers was not considered to be a long-term phenomenon. Labour migration was left to central administrative bodies without creating any public debate around the issue (Weil 1991; Laurens 2006). Conversely, the British authorities very early on managed immigration through the use of political frameworks that focused on the integration of migrants, while at the same time failing to reduce postcolonial immigration to a purely economic logic. From the 1950s onwards, British public debate very quickly centred around immigration, racism and discrimination, whereas in France, immigration only became a major issue in France at the start of the 1980s.

From here, national integration policies in France and Britain would develop divergent models, with Republican integration through nationality on the one hand and race relations and the fight against discrimination on the other. As was already mentioned, these two paradigms nonetheless deal with a shared issue surrounding the problem posed by ethnicity in relation to citizenship (Favell 2001). Above all, solutions to this problem would be reassessed in both countries at the end of the 1990s and the beginning of the new millennium, which shows how the “models” were not as absolute as had been claimed.

2.1. The construction of race relations policies in Britain

With the granting of citizenship to immigrant communities as soon as they arrived in Britain, which was due to the British Nationality Act of 1948, immigrants could be part of discussions concerning their integration into British society. This quickly became a highly

politicised issue. It allowed the initial public response of assimilation to develop and take account of ethno-cultural and religious pluralism as an important element of post-war Britain. It was possible to institutionalise and make more professional the public services dealing with the integration of immigrants due to the establishment of national and local structures focusing on anti-discrimination. The electoral weight of ethnic and religious minorities, in addition to their right to political representation, was an area of competition between the Tories and Labour, but also within the Labour Party itself, between the most progressive wing, which was firmly established at a local level, and a more centrist wing (Geddes 1996; Garbaye 2005).

From assimilation to race relations

Britain's first response to postcolonial immigration was assimilation. Migration increased rapidly from the end of the 1950s and culminated in 1961 in 136,000 new arrivals per year. The issue of the number of immigrants was the focus of a national debate, which soon moved to the issue of "colour" among these communities. Paul Gilroy has shown how notions of national belonging and homogeneity blurred the distinction between "race" and "nation" (Gilroy 1987; see also Balibar and Wallerstein 1988; Solomos and Black 1995). From 1955, the Conservative cabinet foresaw restrictions on "black" immigration, but was not able to get the bill to be adopted. In 1958, riots took place between "white" communities and ethnic minorities in Notting Hill and Nottingham, and were perceived as race riots, showing the limits of an approach that was based solely on the assimilation of immigrants.

The Institute of Race Relations commissioned Jim Rose and Nicolas Deakin to write a report on the state of relations between racial groups, which was a question little studied in the social sciences at the time (Rex and Moore 1967). The report, published in 1969, was entitled *Colour and Citizenship*. The text was inspired by the work of Gunnar Myrdal on the issue of race in the United States (Myrdal 1944) and located two paradoxes in British society that prevented the establishment of a viable integration policy for immigrants. The first element of this "British dilemma" relates to legislation on citizenship and the weight of the colonial legacy, where certain *de jure* citizens did not have the right to enter British territory. The second point relates more directly to racial discrimination and the gap between official liberalism – at the heart of British citizenship – and the situation of ethnic minorities without access to the substantial equal rights that citizenship formally guarantees them (Rose and Deakin 1969). This analysis had a big response in British society and transformed the approach taken towards integration: the issue of integrating ethnic minorities was no longer with minority groups themselves who were incapable of integrating, but with British society

as a whole and its ability to provide concrete equal opportunities to ethnic minorities in order to allow them to access social, economic, civil and civic integration (Daniel 1968; Smith 1977; Brown 1984; Modood *et al.* 1997).

In 1966, when legislation around race relations began, Home Secretary Roy Jenkins gave a definition of integration, which took account of this change of approach which had been suggested in the debate around the 1958 riots. The definition would remain a working tool for British integration policy, even when policy was questioned at the start of the new millennium. For Jenkins, “Integration is perhaps a rather loose word. I do not regard it as meaning the loss, by immigrants, of their own national characteristics and culture. I do not think that we need in this country a ‘melting pot’, which will turn everybody out in a common mould, as one of a series of carbon copies of someone’s misplaced vision of the stereotyped Englishman... It would deprive us of most of the positive benefits of immigration that I believe to be very great indeed. I define integration, therefore, not a flattening process of assimilation but as equal opportunity, accompanied by cultural diversity, in an atmosphere of mutual tolerance.” (Jenkins 1967: 267; for a discussion of this definition, see Rex 2006b).

Thanks to its longevity, this approach to integration has allowed the notions of “race” and ethnicity to be legitimised from an academic perspective, and allowed these notions to be used in public policy and for such categories to be validated in the national census (ethnic categories in 1991, religious ones in 2001; for the history of these categories in the census, see Simon 1997).

The politicisation of “race” and immigration

One of the contributing factors to the development of race relations was the highly politicised nature of integration and the competition between the two main political parties (the Tories and Labour) over this issue. After the political debate surrounding “race” reached a climax with the 1958 riots, the two parties came to a mutual agreement to stop competing over these themes between 1964 and 1966, which was when the first Race Relations Act was adopted in 1965, in order to depoliticise the issue of “race”. Rose and his colleagues saw this period as “a time of liberalism”, which Adlai Stevenson defined as a moment when “men in public life from all backgrounds, radical or conservative, accepted the need for a change in policy in relation to a social problem” (Deakin 1970: 19).

This consensus rested on the idea summed up by Roy Hattersley: “Without integration, limitation is inexcusable; without limitation, integration is impossible.” The Commonwealth Immigration Act of 1962 had just been adopted by the Conservative majority and the

Labour's return to government in 1964 did not question this first tightening of British border controls in relation to postcolonial immigration. In 1968, the Kenyan Asians' crisis was also handled by the Labour government in a very serious way. At the same time, the public authorities saw for the first time the extent of racial discrimination and established an anti-discrimination system. Public race relations policy aimed to neutralise the issues of "race" and immigration and to reduce their impact on public opinion (Geddes 1996: 54; Layton-Henry 1992). So, in the 1970s, a part of the working-class electorate, which had traditionally supported Labour, began being persuaded by the ideas put forward by the National Front, which were an extension of the ideas of Enoch Powell and the "rivers of blood" speech he gave in Birmingham in 1968. The dilemma for Labour was now different: "How to combat racism and consolidate support among ethnic minorities while, at the same time, not alienating white, working-class, anti-immigration voters?" (Geddes 1996: 72). A Labour Party Race Action Group was set up in the mid-1970s in response to this dilemma and Hattersley's idea remained.

The entrenchment of the National Front in society remained weak at a local level and in-existent at a national level (the case was the same for the British National Party in the 1990s and the new millennium). This can be explained by two factors. Firstly, the Thatcher government, from 1979, re-politicised the issue of race to compete directly with the discourse of the far Right, particularly with regard to the idea that national identity was being challenged by immigration. Nationality reforms in 1981 and the introduction of the idea of "partiality" broke with the imperial tradition of allegiance to the Crown and pushed rights more towards *jus sanguinis* (Layton-Henry 1986).

Secondly, Labour held on strongly at a local level during the entire period the Conservatives were in government, and the left of the party pushed forward the anti-racist agenda, promoted members of ethnic minority groups becoming involved in local institutions as representatives and launched initiatives to promote "good" inter-ethnic relations. In the 1980s, a campaign for Black Sections within the party (Shukra 1990) aimed to protect ethnic minorities' allegiance to Labour by making it a particular example of representation for minority groups. Mostly formed in London, in other cities these Black Sections came up against divisions between Black ethnic identity and the religious identity of Asians, which were particularly visible during the affair surrounding Salman Rushdie's *Satanic Verses* (1988) (on this topic, see Modood 1992).

The importance of local politics

To better depoliticise national debates surrounding “race” and immigration, the “time of liberalism” of the 1960s decentralised the management of the integration of ethnic minorities to local authorities and grassroots organisations. Community Relations Councils were set up at a local level whilst section 11 of the Government Act of 1966 allocated funds to local authorities to finance their activities in relation to ethnic minorities. In the same spirit, the Local Government Act (Social Need) of 1969, although not directly focusing on minority groups, set up an Urban Programme to finance disadvantaged urban areas, where minority communities were concentrated. Finally, an amendment to the Race Relations Act 1976 gave local authorities the task of eliminating racial discrimination and promoting equal opportunities.

But aside from these initiatives, “local democracy” is a site informing political life in Britain, inherited from the time when British society was nationalised and industrialised. The fact that postcolonial migrants mainly settled in the big industrial cities of England ended up making the city the area where the issue of ethnicity would be managed, following a perspective close to a theory inspired by the Chicago School. As a framework for the management of the welfare state, being close as it is to concrete socio-economic issues, but also a site of “resistance” from the British Left (particularly the Urban Left of the 1980s) both to the more centrist elements of the Labour Party at a national level and the policies undertaken by the Tory governments in the 1980s and 1990s, local politics is a domain where the problem of integration could be resolved. R. Garbaya has shown how it is at this level that ethnic minorities have been able to defend their interests and also that Labour has established itself and worked on consolidating the traditional allegiance of minority groups to the party (Garbaya 2005, not.: 59).

This type of local politics, which cannot be found in France (Geisser 1997), is also the site of another process – that of political socialisation and the insertion of elected representatives of ethnic minority backgrounds into their functions as representatives. Here, too, the embeddedness of Labour in local politics and its privileged links with minority groups has been a major factor in the political integration of these groups. However, at the end of the 1990s, certain ethnic groups would compete with Labour and the Tories on these issues, and the traditional allegiance of minorities to the Labour Party began to erode (Saggar 1998). At the start of the new millennium, the policies of New Labour cast doubt on what had been gained in race relations policy by promoting a new public issue surrounding the “failure of integration” among minority communities after the urban riots in North West England in the spring and summer of 2001 (Cantle 2001).

2.2. Immigration and the reinvention of the French Republic

At the start of the 1980s, twenty years after it happened in Britain, the French debate around immigration centred on the integration of immigrants and national citizenship. In the mid-1960s, when British society was questioning the condition of postcolonial migrants and making plans for their integration by fighting racial discrimination, French society did not perceive immigration as an issue of citizenship, since migrant workers were encouraged to return to their own countries. The long-term settlement of this foreign, postcolonial population was a “surprise” for the authorities managing the flow of labour between France and the countries of its former empire as well as for the French public. At the end of the 1970s, there were plans to forcibly repatriate immigrants, but these failed (Weil 1991; Laurens 2006).

With the borders being closed to all labour migration in 1974, the presence of immigrants changed. There were more foreign families by way of family reunification policies (Hollifield 1992). Furthermore, the children of these immigrants automatically became French citizens by virtue of nationality law. In this way, the issue of immigration moved into the public agenda when “immigrants turned to politics” (Wihtol de Wenden 1988).

National identity and immigrants

Immigration, which had become an issue of ethnic minorities and no longer one of migration, was then seen as a threat to national identity. Due to the ambivalent development of Republican ideology, under which the abstract universalism of citizenship was necessarily tied to a very strong national identity, the challenge of migration was seen on two levels: it was purportedly both a challenge to the principles of the Republic (the separation of the public and private spheres, civic responsibility and individualism) and national identity itself (Wieviorka 1997). The problem with immigration was not the number of immigrants; it was their origin (“non-European”, “North African”, “Muslim”). Islam brought about discussions about national citizenship being “in danger”. However, at the same time, the largest foreign community in France was those of Portuguese nationality (Cordeiro 1997). But the “visibility” of the North African community, the weight of the colonial legacy and the growing influence of the Front National (FN) on debates drew attention to this community, which was not dissimilar to the “colour problem” present in British debates in the 1950s.

There were the strikes in the car manufacturing industry in 1983 (Kepel 1991; Costa-Lascoux and Temime 2004), where “Muslims” demanded prayer rooms; the extended strike over rent payments in immigrant workers’ hostels (SONACOTRA) between 1976 and 1980; and the “Muslim headscarves” affair and the exclusion of three girls from a high school in the

Paris region (Creil) because they refused to remove their veils in class. While France was celebrating the bicentenary of the 1789 Revolution, these events shifted the issue of integration to the ethno-cultural and religious identity of communities who had, for the most part, already become French citizens.

These new French citizens, who were still described using the term “immigrants” for want of legitimate ethnic categories in France, were stigmatised as being “French without knowing it” or “French on paper”. The FN took up these ideas when it gained its first electoral successes, first in the municipal elections in 1983 (Dreux) and then in the European elections of 1984 and the general election of 1986, where 35 deputies were elected to the French National Assembly.

In what ended up being perceived as a “crisis of French integration”, the problem was not seen as one of French society adapting to the new social realities of its population, nor one of equal opportunities and discrimination. The problem was perceived to be the conditions required to access the rights of citizenship through nationality – conditions which were judged too liberal. It was therefore nationality which had to be reformed, following the line that certain people “do not deserve to be French” (an idea put forward by the FN) and that there was an issue of double allegiances, especially in the case of young men of North African origin who had reached the age where they had to complete their military service – even though only a very small number of such young men performed military duties in the land of their parents, due to conventions that were signed with Tunisia (in 1982) and Algeria (1983) (Tribalat 1995: 209); for a discussion of military service among bi-nationals, see Legomsky 2003; Bertossi and Wihtol de Wenden 2007: 37-40).

“Beur” organisations and “new citizenship”

New organisations, inspired by the civil rights movement in the United States, were set up by immigrant communities at the start of the 1980s. The October 1981 law, which gave foreigners the right to form organisations without prior permission from the Prefecture, brought the status of these organisations closer to that of French organisations which were governed by the law of 1901. This new law was part of a series of reforms brought in by the Socialist Party (Parti socialiste, PS) after the presidential elections of 1981 (in particular, the ten-year residence permit in 1984). Collective action by the immigrant community and those of immigrant origin then became a national phenomenon, and SOS Racisme and France Plus were created. These were two influential organisations during the 1980s which were tied to some parts of the Socialist Party.

In 1983, the first “*Marche des Beurs*” (“March of the Beurs”, using a word for “Arabs” in French slang) campaigned “for equality and against racism”, using the slogan “residents of different cultures and backgrounds for solidarity in France”. This was followed a year later by the “*convergence 1984 pour l’égalité*” (“1984 campaign for equality”), which used the slogan: “to live together in equality, with our similarities, whatever our differences” (Wihtol de Wenden 1987: 208). As the first anti-racist approach to fight the ideas of the FN, such activism developed and dealt with wider issues in French society in general – such as the position of these new French citizens and their parents; the place of immigration in the national collective memory; equal opportunities, discrimination, the “right to difference” (SOS Racisme) and the “right to resemblance” (France Plus); these new citizens registering to vote (France Plus); voting rights for foreigners in local elections (which was a pledge made by Mitterrand as a candidate in the presidential election of 1981, but never applied) (Wihtol de Wenden and Leveau 2001).

The project was about “new citizenship” (Bouamama *et al.* 1992), was separate from national identity and put forward a more liberal approach focused on “common belonging”. With internal tensions and difficult relations with the Socialist Party, and with no local institutional representatives like there were in Britain, this movement lost power in the 1990s, and less ambitious activism became more popular, which was more focused on urban areas or estates and looked at social issues (education, professional training, work, housing, drugs, women, discrimination). Although the movement played its part in the withdrawal of the initial plans for a reform of the Nationality Code in 1986, it did not succeed in diverting the political handling of integration, which took shape between the end of the 1980s and the start of the 1990s.

Nationality as an instrument for “French integration”

The political response to the politicisation of immigration first took shape in plans to reform the Nationality Code in 1986, against a backdrop of an unprecedented period of cohabitation between the parliamentary majority (and a Prime Minister) on the Right (RPR party) and a Socialist President of the Republic. The plans were mainly to replace the automatic right to citizenship by virtue of being born in France with a “demonstration of willingness” for young foreigners, aged 16 to 21 and born in France, to acquire French nationality. Since it was up against a very strong campaign, the project was withdrawn, and in June 1987 the Prime Minister set up an “Expert” Committee drawn from civil servants, academics and representatives from “civil society” to think of a way in which French nationality could be adapted to suit the “challenges” of integration (Long 1988a).

In the same way as J. Rose's report in 1969, the work of the Marceau Long Commission (taken from the name of its president, who was also vice-president of the Council of State) was a decisive element in the formation of political consensus surrounding the definition of integration. But this consensus worked according to principles which were very different. Furthermore, the method by which it was achieved was new in relation to the French tradition of developing public policy, for it was inspired by Anglo-Saxon public commissions into the big issues in society. Over a period of ten months, the Commission carried out around one hundred hearings, which were shown on national television (on the FR3 station). At these hearings, there were appearances by representatives of local organisations, "Beur" organisations and others focusing on defending human rights, but also social workers, demographers, sociologists, political scientists and civil servants in charge of policy surrounding nationality and the reception of migrants. These hearings revealed a new dimension in public debate in relation to migration and integration, which was access to the job market, housing and education. One could see clearly how immigration was now an issue of citizenship and the so-called "immigrants" were French citizens whose parents "shed blood" for France in the big conflicts of the 20th century. The full weight of racism and postcolonialism could finally be seen (Long 1988b). They weren't the "bogus citizens, citizens out of nowhere" that one historian who was a member of the Commission, had talked about (P. Chenu, *L'Express*, 24-30 October 1986).

The "France of integration" of the 1980s (Schnapper 1992) gave way to assimilation, which was a concept inherited directly from colonial history (even though it was already to be found in French nationality law, in articles 21-4 and 21-24. See Saada 2006: 68). In order to define integration, the Long Commission's report reconfigured the "Republican tradition" of France drawn from the 1789 Revolution and the Third Republic (Long 1988a: 235). The French nation was perceived as "political" in contrast to the German nation (Brubaker 1992), and "Republican" in contrast to "Anglo-Saxon communitarianism" (Schnapper 1994). The terms are those used a century beforehand by those promoting the 1889 law which gave a mixed model of French nationality based on *jus sanguinis* and *jus soli* (Noiriel 1988; Weil 2002; Bertossi 2001: 73-82). This mixed form of nationality was conceived as an institutional response to the societal problem of the integration of foreigners in French society, since "no country has an interest in allowing foreign minorities to develop too strongly within its own territory, since they would be conspicuous due to the claim to be different or stigmatised due to being excluded from social and national life" (Long 1988a: 235). Nationality, which was reformulated on the basis of that voluntary steps would be taken by applicants for French citizenship – whilst the Third Republic had based nationality on automatic access – was a "tool for such integration (...), a point of reference for national

identity. One should organise, all together, the right to integrate for those foreigners concerned, the recognition of their individual choices and an ability to verify, where needed, the degree to which such integration has worked” (Long 1988a: 87).

This conception was accepted by political parties across the board, with the exception of the FN. After the Socialist Party returned to government, the Haut Conseil à l’Intégration (High Council for Integration, HCI) was set up in 1989, whose mission was to inform and advise government policy. In 1990, the first head of the HCI was Marceau Long, the former president of the nationality Commission. In its initial reports, the HCI took up and developed this new definition of Republican integration. “French integration” (HCI, 1991 and 1993) was threefold: the incorporation of individuals and not groups (rejecting ethnic and minority issues); individuals being granted nationality (a formal concept based on equal rights due to national belonging); and the abstract concept of equality (rejecting equal opportunities and anti-discrimination). In short, the prevailing idea was that the granting of nationality was enough to make foreigners “citizens just like others”.

Depoliticising nationality and the debate surrounding secularism

When, in 1993, the RPR party (Rassemblement pour la République) won the general election, nationality reforms were adopted and were then immediately followed by a new law concerning “immigration control” (the Pasqua Law), which were justified with reference to a phrase identical to that of Roy Hattersley in the 1960s: to allow integration to happen, there must be immigration controls. Nationality law returned to the Civil Code (which it had been removed from in 1927), replaced automatic *jus soli* (article 44) with a “demonstration of willingness” (“*manifestation de volonté*”) and removed the colonial legacy from nationality (the dual *jus soli* in article 23, according to which children born to parents who had also been born on French soil was also applied to the descendants of former colonial subjects). But since it had been decentralised to the regional level, the practice of “demonstrations of willingness” revealed serious inequalities in the levels of success for applicants according to different regions (Fulchiron 1996). Once again in power in 1997, the Socialist Party commissioned P. Weil to write a report on the evaluation of the 1993 reform (Weil 1997). In 1998, a new reform was undertaken, which restored article 44 and, partially, article 23.

Since 1998, nationality has no longer shaped debates surrounding integration in France. It has been depoliticised in favour of a new agenda – that of French secularism in the face of the integration of Muslims, which follows a noticeable development at a European level. Immigrant communities were no longer identified according to their ethnic identity (e.g.

Blacks and Asians in the UK) or nationality (e.g. North Africans in France), but now according to their supposed religious identity as Muslims. After 2002, when the French Council for the Muslim Faith (Conseil Français du Culte Musulman, CFCM) was created, under the auspices of the Interior Ministry, to represent Muslims in France, a new debate about the future of the principle of secularism resulted in a law being adopted on 15 March 2004, which banned “conspicuous” religious symbols from state schools.

The debate surrounding secularism has many characteristics in common with the debate surrounding nationality two decades previously: a culturalist approach to integration, according to which the identity of those being integrated hinders their integration; Islam as a cause of debate; the setting up of a Commission on secularism which is similar to the 1987 Commission on nationality (Stasi 2003); a strong political consensus built around a conservative approach to the Republic; the adoption of a restrictive law which broke with the traditional institutional balance, where “Muslim veil affairs” were dealt with on a case-by-case basis in educational establishments (see the decisions made by the Council of State in 1989 and 1993). Once more, “French integration” rejected a so-called “communitarian” approach, but now the debate surrounding ethnicity found greater weight because, since 1997, there was an emphasis placed on considering importing anti-discrimination policies, which was enforced by article 13 of the Amsterdam Treaty and led to the adoption of several laws and the implementation of new public anti-discrimination initiatives.

2.3. The crisis of the French and British integration “models”

The starting point for some of the literature comparing integration in France and the UK during the 1990s is the analysis of a crisis in national integration (Lapeyronnie 1993; Neveu 1993; Favell 2001), particularly in the context of Europe (Bertossi 2001 and 2007a). So, if such a comparison has often highlighted, term by term, the contrasts between French and British debates and public policy, this crisis in the two national “models” has, at the same time, ended up providing an outline of elements where the two countries converge with regard to defining integration “problems”.

The reappraisal of British race relations after 2001 was echoed in attempts to redefine “French integration” at the end of the 1990s through the theme of anti-discrimination. The social sciences barely started to make sense of these parallel developments. We know little about the impact of the new British agenda called “community cohesion” in relation to the local functioning of integration policies. On the French side, literature on ethnicity has opened up widely thanks to the debate surrounding discrimination and the defence of an approach to integration which is more accepting of the issue of ethnicity, leading to a general

transformation of this “model” (De Rudder, Poiret and Vourc’h 2000; Fassin and Fassin 2006).

British liberalism on the defensive

Out of the factors contributing to an increased awareness of the levels of discrimination and racial segregation in Britain, the urban riots were among the most important. The national response in terms of race relations was first put into practice during the 1958 riots. The phenomenon of urban violence was repeated, specifically in Brixton, London in 1981 and then throughout the 1980s, 1990s and into the new millennium. In the same way that Rose’s report showed the need to fight against the social and racial exclusion of minority groups – which was the cause of violence in Notting Hill and Nottingham – Lord Scarman’s report on the violence in Brixton drew a link between the repressive nature of conservative government policy at the time and the social relegation of ethnic minorities (Scarman 1981). He drew particular attention to the problem of police attitudes, without yet talking about “institutional racism”.

Twenty years after the Scarman report, the urban riots in Bradford (Ouseley 2001), Burnley (Burnley Task Force 2001) and Oldham (Ritchie 2001) led to a change of direction in the normal liberal analysis drawn up by the national authorities. The report by the Home Office commission led by Ted Cantele at the end of 2001 tried to analyse the violence between young “Muslims” and the police. This report did not dwell on the exclusion felt among these communities. Rather, it described minority communities “leading parallel lives”, which became more pronounced due to arranged marriages with foreign spouses and a lack of command of the English language and the “values” constituting Britishness (Cantele 2001). In short, British society had “lost” a minority of its population who were refusing to integrate. The problem of integration was now perceived as a lack of citizenship, loyalty and civic responsibility. In response, a new agenda emerged from this analysis – that of “community cohesion”. Strongly inspired by the public “philosophy” of Home Secretary David Blunkett, community cohesion placed an emphasis on a participative conception of citizenship, formed out of moral and civic virtue and based on national values of “living together” that would be promoted. This was closer to Republican ideology than liberal ideology: there was a shared vision and sense of belonging for all the communities in British society; diversity was seen as a positive value; there were individual equal opportunities; and there would be positive and strong relations between individuals belonging to different communities, in the workplace, at school and in the neighbourhood (Cantele 2001).

However, another element in the debate concerned immigration, and more specifically asylum, an issue which had been highly politicised during the 1990s (July 1996), and illegal immigration. So, the Cattle report provided a link between the situation concerning the integration of minorities and the issue of immigration. The suspicion which was created by New Labour political debates with regard to the abuse of the asylum system became extended to undocumented migrants (cf. the closure of the Sangatte reception centre in December 2002 after agreements between the Home Office and the French Interior Ministry) and also legal immigration and immigrant communities. This development could also be seen in France (particularly in the political debate surrounding “*immigration choisie*” (“selected immigration”), which was at the core of the 24 July 2006 law concerning immigration and integration – see Héran 2007).

A year later, the Home Office published a report entitled *Secure Borders, Safe Haven* (Home Office 2002a), which announced a change in the legislation. The new Nationality, Immigration and Asylum Act of 2002 was based on three components: firstly, the symbolic strengthening of nationality (pledges of allegiance, citizenship tests, the importance of British values); secondly, the strengthening of asylum policy; and finally, in the post-9/11 context, increased security measures (increased powers for immigration and border police to conduct investigations, the withdrawal of nationality from anyone who acts in a way that could seriously harm British national interests) (Home Office 2002a).

Although we cannot yet assess the consequences of this change of agenda in British integration policy, it nevertheless seems that “community cohesion” is a turning point in the history of the policy of citizenship in Britain. Roy Hattersley’s belief – an end to immigration alongside liberal integration – which has been, since 1965, a guideline for policy in relation to ethnic minorities, has been largely reconfigured. The idea of an end to immigration remains, but the liberalism of integration policy seems to have shifted in part to a form of Republicanism close to the terms of debate in France surrounding “*communautarisme*” and Islam. This led Trevor Phillips, Chair of the Commission for Racial Equality, the institutional custodian of the race relations agenda, to declare in 2004 that “multiculturalism implies separation. We are no longer living in the 1970s, let’s create an active and shared citizenship” (The Times 3/04/2004). These issues surrounding the British model also entered debate in academia, with Brian Barry’s “egalitarian critique” of multiculturalism (Barry 2001; cf. Rex 2007: 79). In particular, his book was aimed at the theoretical approach of Bikhru Parekh, which had itself had an important impact on British debate after the Runnymede Trust published a report in 2000 (the “Parekh report”), which saw Britain as a “community of communities”, and suggested a “pluralist” approach as a critique of “conservative”,

“liberal” and “Marxist” approaches to ethnicity and made many suggestions (on fighting racism, education, institutions, employment, housing, the media, etc.), of which many were taken up by the government (Commission on the Future of Multi-Ethnic Britain 2000; Runnymede Trust 2004).

French Republicanism “improved” by anti-discrimination

The Republicanism which was “rediscovered” in the 1980s as a grounding for French citizenship (Feldblum 1998) eliminated all anti-discrimination measures to the benefit of a legalist and formal approach to equality between citizens. In short, the status of being a national now seemed to be a condition for being a citizen and being a citizen seemed to be sufficient in order to be granted equal rights. The constant reminder of the Republican equality at the heart of the French nation-state justified the denial of all pluralist approaches based on equal opportunities.

However, mainly due to European integration which, with the Amsterdam Treaty, included anti-discrimination in the European community, the definition of equality developed noticeably after 1997, at a time of a fresh change in power and the return of the Socialist Party. So, to include anti-discrimination in French national initiatives, one must first analyse the Republican notion of colour-blind equality, since anti-discrimination and equality within the Republic are not two sides of the same coin, as was shown by Marie-Thérèse Lanquentin (GELD 2000: 1). From the point of view of “Republican doctrine”, both anti-discrimination and equality draw on two contrasting issues – hence the political and social use, in the French media and politics in the 1980s and 1990s, of the contrast between “French integration” and British policy. The Council of State’s annual report in 1996 focused on this topic and showed how discrimination was eroding the social and political relevance of the Republican citizenship (Council of State 1997). Discrimination had become an issue for the Republic.

Importing the anti-discrimination agenda also created a political opportunity for a new discourse surrounding integration. In 1998, the Minister for Employment and Solidarity took the initiative over the issue and proposed that integration policy should be relaunched according to three elements: improving the reception of immigrants in an atmosphere of tolerance; fighting discrimination; and encouraging people to acquire French nationality. The Republican balance in the conservative guise shown in the Marceau Long report had disappeared. However, the transformation of this new programme into national initiatives was troublesome, and the first “pilot” institutions in charge of anti-discrimination had little impact, such as the Groupe d’Etudes et de Lutte contre les Discriminations (Group for

Studying and Fighting Discrimination, GELD) and the Commissions Départementales d'Accès à la Citoyenneté (Departmental Commissions for Access to Citizenship, CODAC). The most important factor was the voting in of several laws, which allowed the two Council of Europe directives of June and November 2000 to be included (the "race" 2000/43/EC and "employment" 2000/78/EC directives, respectively). Employment (the law of 16 November 2001) and housing (the law of 17 January 2002) were now covered, and sentences were increased for racist, anti-Semitic and xenophobic crimes (the law of 3 February 2003).

But the increased debate surrounding secularism and Islam between 2002 and 2004 and, above all, the urban riots across most French regions in October and November 2005 would harden the approach of the State. What is more, the presence of the leader of the FN in the second round of the presidential election in 2002 led to national identity becoming repoliticised in a big way, with an approach focused on security. This has resulted in a contrasting situation.

On the one hand, anti-discrimination remains a national priority (which was seen in a speech by the President of the Republic in Troyes in 2002 and the creation of the Haute Autorité de Lutte contre les Discriminations et pour l'Égalité – the High Authority for Anti-Discrimination and Equality, HALDE). Initiatives such as the Charter for diversity in business, anonymous CVs, "positive discrimination" conducted by prestigious university establishments, who selected pupils from disadvantaged neighbourhoods, have all been tied to the public debate surrounding discrimination. On the other hand, besides the use of these issues by the interior minister in 2003, when he appointed the so-called "first Muslim *Préfet* in France", Islam has continued to be seen as a "problem" for integration in France, and was identified by some intellectuals, the mainstream media and leading politicians as one of the reasons for the urban violence in 2005 (Fassin and Fassin 2006; Bertossi 2007b).

Besides the question of Islam, French policy on identity also became tougher in relation to the issue of postcolonialism. Article 4 of the 23 February 2005 law on the positive aspects of French colonisation – mainly in North Africa – which school syllabuses were supposed to highlight, created a new movement that hadn't been seen before, which was based around the "Indigènes de la République" ("Natives of the Republic") (Khiari 2006) and an unprecedented "black" organisational movement (Le Conseil Représentatif des Associations Noires – Representative Council of Black Organisations, CRAN). In the face of intense opposition to this article and after the Constitutional Council invalidated it, the law was repealed by the President of the Republic.

In other words, even though it allowed the anti-discrimination approach to be included in integration policy (between 1998 and 2002), the French “liberal hour” did not succeed in bringing about a fundamental shift in the national ideology of the Republic with regard to citizenship and ethno-cultural and religious diversity. Upon delivering her annual report for 2003 to the Prime Minister, the head of the High Council for Integration declared that this period “was a turning point where, by French society being questioned and held responsible for discrimination, we gave up on integration and kept urban policy in the dark”, which allowed “ethnic communities to be taken into account”. She concluded that it was necessary to “break” with the “logic of guilt and discrimination” (*Le Monde* 26/01/2004).

3. Aspects of integration: state policy and institutional relations

If France and Britain share the experience of having tried to resolve the “problem of integration” through access to citizenship, the politicisation of these themes ended up resulting in relatively different conceptions of “living together”. But these differences, which became more pronounced due to national discourses on integration, can be seen in a different light when one looks at the area covered by state policy in both countries.

Firstly, besides the different scale of anti-discrimination initiatives, which are more advanced in Britain and face a certain amount of resistance in France, national policy has placed an emphasis on key areas, such as urban areas, employment, education and housing. Secondly, relations with institutions have been seen, on both sides of the Channel, as the focal point for integration. The approach to integration put forward by citizens’ institutions, in their widest interpretation, is therefore not specific to France in relation to British policy, which supposedly aims for integration through ethnic communities, despite very widespread received wisdom in France (cf. HCI 2006). This means that the relationship between state institutions and minority communities is another social sphere where the two countries seem to be converging. The example of the police and the army illustrates this point well.

3.1. The field of integration policy

In both countries, state institutions have been created to fight discrimination and establish integration policies. Here, urban areas typify the issues of a crisis on a number levels, which has ended up being interpreted as an “integration crisis”, comprising a crisis in the city, in the welfare state and in housing and unemployment.

Public institutions in charge of integration policy

In France, the sphere of integration belongs to the ministry of social affairs, although it can concern other departments (the state education system, the ministry of justice, etc.). Furthermore, the interior ministry, which is in charge of immigration, is also in charge of religion. The interior ministry has been instrumental in the institutionalisation of Islam in France (Frégosi 2006; Laurence 2005), which, in particular, led to the Nainville-les-Roches agreement in December 2002 and the creation of the CFCM in 2003.

It was mainly from the 1980s onwards that the present-day measures were implemented nationally, although recent reforms have meant that it has developed. In 1989, an Interministerial Committee for Integration was set up to guide integration policy, alongside the HCI, which was formed in the same year and placed under the authority of the Prime Minister. Today, two agencies are entrusted with the implementation of integration policy.

The Agence Nationale de l'Accueil des Etrangers (National Agency for the Reception of Foreigners, ANAEM) ensures the reception of new immigrants within the framework of an "integration contract", which was created in 2004. The Agence nationale pour la cohésion sociale et l'égalité des chances (National Agency for Social Cohesion and Equal Opportunities, ACSE) is in charge of the integration of foreigners and part of urban policy. It was set up in 2006 and replaced the Fonds d'Action Sociale pour les Immigrés et leur Famille (Social Action Fund for Immigrants and Their Families, FAS), which had been set up in 1958 during the Algerian War and was in turn involved in anti-discrimination in 2001 (becoming FASILD). Finally, HALDE deals with all forms of discrimination, without focusing solely on ethnic or religious discrimination (the laws of 30 December 2004 and 31 March 2006).

The local implementation of these measures cannot be distinguished from the central power of the state, but is decentralised to local and regional representatives of the central authorities (regional and departmental prefectures, regional and departmental social and health affairs offices – directions pour les affaires sociales et sanitaires, DASS). As for the policies implemented by local authorities, they still fall into the framework of social policy, without dealing specifically with immigrant communities.

In relation to the national implementation of French policy, British policy leaves a prominent role to a completely decentralised local framework, particularly with regard to language teaching for new arrivals, but also the most practical aspects of anti-discrimination and social policy for ethnic minorities, in partnership with local organisations. The Home Office has long played a leading role in British integration policy. Since May 2006, it has transferred its functions concerning anti-discrimination to the Department for Communities and Local Government, whilst still being in charge of nationality.

The cornerstone of the British system has been the Commission for Racial Equality (CRE), which was the inspiration for the creation of HALDE in France (Belorgey 2001; Stasi 2004), but which has had greater levels of funding. The CRE was set up following the Race Relations Act 1976, and there are plans for it to merge with the newly established Commission for Equality and Human Rights (CEHR) in 2009, itself set up in 2006. More widely, all aspects of anti-discrimination measures will be affected, which fall under the remit of different laws (sex discrimination in 1975, "race" in 1976, disability in 1995). Although it has long been excluded from anti-discrimination legislation in England, Scotland and Wales (but not in Northern Ireland), religious discrimination began to be incorporated into anti-discrimination legislation after 11 September 2001. The Antiterrorism, Crime and Security Act 2001 provided stiffer sentences for religiously aggravated crimes. Another law moved the fight against religious

discrimination into the workplace in 2003 (the Employment Equality (Religion or Belief) Regulations).

The prospect of all this legislation merging under a common policy fighting all forms of discrimination (gender, ethnicity, race, religion, sexual orientation, disability) is part of a process of Europeanisation in line with article 13 of the Amsterdam Treaty. It is also part of recent developments in debates surrounding British race relations. The year 2009 is now seen by British practitioners in the field of ethnicity as a reappraisal of the specific nature of racial and religious discrimination in relation to other forms of discrimination.

Anti-discrimination policy and social cohesion (Britain)

Unlike in France, where “race politics” has for a long time only concerned anti-racism (Bleich 2003: 114-141), with the law of 1 July 1972, Britain developed what is today certainly the most advanced national policy in Europe in the field of anti-discrimination. The legislation, as we have seen, developed progressively with the first Race Relations Acts in 1965 and 1968. The 1965 law banned discrimination in public places (in pubs and hotels, for example). A limited Race Relations Board (RRB) was set up to establish Local Conciliation Committees in order to deal with complaints. In the same year, a White Paper announced the setting up of the National Committee for Commonwealth Immigrants (NCCI), which would support the activities of local organisations involved in work helping migrants (education, social needs, information, etc.). The 1968 law went even further – it took anti-discrimination to the workplace, housing, trades unions and employers organisations, banks, insurance and access to goods and services. The Community Relations Commission (CRC) was set up to replace the NCCI.

The Race Relations Act 1976 considerably reinforced anti-discrimination legislation: it included, under its remit, indirect discrimination, thereby introducing not only an individual approach to discrimination but also a logic of “group” equality (Bleich 2003: 102); it allowed plaintiffs to directly undertake civil proceedings; it gave guidelines for “positive action” in relation to minorities in order that they could be developed in the workplace; section 71 of the Act made local councils responsible for “equal opportunities” and “good relations between communities of different races” (quoted by Garbaye 2005: 51); and it set up the new Commission for Racial Equality (CRE), whose powers far exceeded those of previous bodies, the RRB and the CRC combined (powers to set up enquiries, pressure those committing discrimination, offer legal assistance and representation in courts, advise the government and offer financial support to organisations working towards “good relations” between ethnic groups). Finally, the major innovation was the Race Relations Amendment

Act 2000, which brought public authorities under the 1976 law, following the report into the murder of Stephen Lawrence, a teenager of Jamaican origin. The report highlighted institutional racism, particularly in the police force (MacPherson 1997).

The development of the areas in which anti-discrimination legislation could be applied and the way in which it became rooted in institutions are also particular issues at a local level where, from the 1980s, many structures had been set up to deal with the race relations agenda, varying from town to town (Joly and Candappa 1994; Garbaye 2005: 57-59).

But anti-discrimination policy was not the only mainstay of British integration policy. When the Race Relations Act 1968 was adopted, an Urban Programme – first implemented under the aegis of the Home Office before becoming the responsibility of the Department of Environment in 1977 – allowed the authorities to support areas with a high concentration of ethnic minorities by financing the social and educational projects of the local councils. From the end of the 1970s, it also undertook initiatives of a more economic nature (Moore 2001: 126-127). The issue of ethnicity entered urban policy, and research conducted in Birmingham brought an empirical and theoretical understanding of the issues related to problems accessing housing among ethnic minorities (Rex and Moore 1967; Rex and Tomlinson 1979). The problem of the inner cities which, out of a decline in industry and the welfare state, accumulated social and economic disadvantage, became the centre of attention. Since the 1980s, the method combined social development initiatives in disadvantaged areas and partnerships between the public and private sectors with calls for projects in certain neighbourhoods and towns which had been targeted (City Challenge in 1991 and the New Deal for Communities in 1998).

In January 2001, New Labour launched a new strategy (the National Strategy for Neighbourhood Renewal, NSNR) and, after the urban riots in the spring and summer of 2001, presented it as one solution to ethnic “segregation” – a new term which a report emphasised had not been given enough attention in Britain (Home Office 2001: 21). The NSNR involved Local Strategic Partnerships between the State, local councils and grassroots organisations. This was accompanied by a Neighbourhood Renewal Fund. An approach using urban regeneration initiatives became a way of building local inclusive communities, where social cohesion could be measured in terms of social capital (on this subject, see in particular Home Office 2002b). This is at the heart of the politics of community cohesion, where integration aims to restore disadvantaged urban areas (70% of ethnic minorities are concentrated in the 89 most disadvantaged areas in England: Home Office 2001). Above all,

it also emphasises working on social ties, including the new approach of active citizenship, rather than minorities “leading parallel lives” (Cantle 2001; Home Office 2002b).

“Territorial positive discrimination”: an indirect approach to ethnicity (France)

J. Donzelot stated that, in France, “urban policy might have called itself integration policy. But in France, as everyone knows, there are no integration problems, so they called it ‘urban policy’” (Donzelot 2004: 179). The point of departure for social cohesion as dealt with in the French territories goes back to 1977, when the first urban projects were set up to fight social exclusion by working on its spatial dimension (Simon 2002: 81), which began the approach called “*développement social des quartiers*” (“social development in the community”). These projects only became effective in 1982. Yet, the early 1980s was marked by a series of riots, which were linked to the issue of the integration of immigrant communities in “urban areas” (Martiniello and Piquard 2002): riots in Vaulx-en-Velin in 1979, between 1981 and 1983 in the “Minguettes” neighbourhood in Vénissieux, and later, once again in Vaulx-en-Velin in 1990 and in Sartrouville and Mantes-la-Jolie in 1991. After these riots were considered to be a combined issue of spatial segregation and social exclusion in urban areas (Dubedout 1983), “urban law” (“*droit à la ville*”) emerged progressively with the adoption of the *loi d’orientation pour la ville* (urban framework law, LOV) on 13 July 1991, which complemented the law on housing rights (the Besson law of 31 May 1990) and was followed by a law on social diversity in housing in 1995.

Here, we see the appearance of an approach from the State which diverged from the “high politics” of the same period, which were focused on nationality. In the wake of the setting up of the *Délégation Interministérielle à la Ville et au Développement Social Urbain* (Interministerial Delegation for Urban Areas and Urban Social Development, DIV) in 1988, a normative framework developed, whereby integration was not only an issue for immigrant communities or communities of immigrant origin, and citizenship could not be reduced to nationality (DIV 1993). The aim of urban policy was therefore to promote “territorial positive discrimination” (interministerial delegate for urban areas, cited by Moore 2001: 119).

This approach to social cohesion in the French territories goes beyond the simple framework of housing policy: it encompasses education (the creation of *zones d’éducation prioritaires*, education action zones or “ZEPs”, in 1981), delinquency (local councils for preventing delinquency in 1982) and employment (local taskforces to help find employment for struggling youths in 1981). The issue of urban areas was a question of citizenship (Conseil Economique et Social 1996). This weakened, “without removing them, the frontiers that had been drawn by the work of the state between contributors (‘youths’, ‘immigrants’,

'the unemployed', 'families', etc.) by grouping them together in a wider category – 'residents'. Immigrants are therefore understood to be residents who have certain problems requiring, where necessary, particular consideration" (Lorcerie and Geisser 1993: 750).

This led to the state directly targeting communities of immigrant origin, as was the case with the ZEPs, which included specific syllabuses to respond to the needs of the children of immigrants (Lorcerie 1995). Finally, these initiatives involved a set of local participants such as neighbourhood organisations, and the State became the "coordinator" rather than the "one giving orders" (Donzelot and Estèbe 1994), with an attitude focusing on delegation and "helping people to help themselves", where organisations played an important role (Wihtol de Wenden and Leveau 2001: 124). By "appointing" organisations which could be based on national, ethnic or religious solidarity, this was also a process of ethnicisation which could be supported by the state authorities, whilst local authorities could promote certain forms of "*communautarisme*" by negotiating electoral support from certain groups in exchange for responding to their cultural or religious needs, such as promising to build a mosque (Geisser 1997).

In the final analysis, the politics of "French" integration is paradoxical. On the one hand, by adopting a territorial and colour-blind approach to integration, French state policy stigmatised communities which were concentrated in these areas – this was the idea, in the dominant public analysis of the 2005 riots, that the *banlieues* (suburban areas) were equated to "immigration" (Fassin and Fassin 2006: 6; Joly 2007; Bertossi 2007b). On the other hand, whilst the situation of "immigrants" has been identified since the mid-1980s as an element of the "urban crisis", this issue continues to be ignored in state policy, which is blind to the issue of ethnicity being bound up with social issues (Simon 2002: 84; Fitoussi *et al.* 2004). Therefore, the response to the 2005 riots was, as a result of the law of 31 March 2006, an increased number of urban free zones to "encourage employment and benefit residents living in troubled neighbourhoods" and the setting up of the Agence Nationale pour la Cohésion Sociale et l'Égalité des Chances (National Agency for Social Cohesion and Equal Opportunities), "in order to increase State presence in sensitive neighbourhoods (...) to take action (...) for communities who are having difficulty finding social and professional integration across the country, *particularly* with regard to immigrant communities" (presentation of the law of 31 March 2006, Ministry of Social Affairs – my emphasis). Present-day French anti-discrimination measures are part of this ambiguity.

3.2. Relations with state institutions

Another place where we can see the usual contrast between the French and British integration “models” is in the position of state institutions and their relations with ethnic or religious minorities. In France, the presence of members of ethnic minorities in state institutions has for a long time received no specific attention. In Britain, on the other hand, the issue of an inclusive society has been raised at an institutional level, as we have seen. This has not only been about “access racism” (Bleich 2003), but also about the presence of members of ethnic minorities, with the concern being that “institutional society” should be a faithful reflection of the sociological composition of the whole of society. Without being turned into a policy of quotas, efforts have been taken to reach certain targets, particularly in institutions where minorities have been historically under-represented, in political institutions and also in institutions carrying a “racist” image (the police, fire brigade and the military).

Here, the contrast between France and Britain should be put in perspective for a number of reasons. Firstly, relations between state institutions and minority groups can be antagonistic in both countries, especially as far as relations with the police are concerned. Secondly, the development of debates surrounding discrimination in France has partially taken up the issue of the under-representation of minority groups in the French institutional setting (the media, political institutions, the senior civil service, universities and the Grandes Ecoles, leading higher education institutions with entry based on competitive examinations). Above all, the internal developments of institutions can change the traditional “doctrine” used to deal with the issue of ethnicity and religion. In other words, in both France and Britain, the issue of institutional relations comes out of, firstly, conflict between institutions and minorities and, secondly, the participation of minorities in institutions of the “dominant” society.

Antagonistic relations with institutions: the example of the police

As symptoms of the integration crises in France and Britain, urban riots raise the issue of relations between minority groups and institutions such as the school, the family and the police, whose role is increasingly being called to account (Centre d’Analyse Stratégique 2006a: 6). As a result, “riots almost always begin with incidents with the police” (Lapeyronnie 1993: 266).

In France, the issue became a political one at the start of the new millennium, with the rise of security in the electoral themes, which culminated in the presidential elections of 2002 and, above all, the media and political treatment of the urban riots in October – November 2005 (Fassin and Fassin 2006; Khiari 2006; Bertossi 2007b). In 2004, the annual report of the Commission Nationale de Déontologie de la Sécurité (National Commission for Deontology

in Security, CNDS) drew a link between racism and police treatment of immigrant communities and communities of immigrant origin, and revealed very low levels of awareness of these issues in the police force (both in the national police force and the border police) and a lack of training for police officers (CNDS 2004: 490-523). The issue of discrimination in the police force was then open to debate (Wihtol de Wenden and Body-Gendrot 2005).

These issues were given particular weight in Britain insofar as this antagonistic relationship between the police and minorities gave rise to the amendment in 2000 of the Race Relations Act 1976, which took anti-discrimination into state institutions (MacPherson 1997). Public hearings of the Commission in charge of the inquiry into the police force's "racially biased" attitudes when dealing with the murder of teenager Stephen Lawrence revealed the scale of a problem which was not limited to the police force. The conclusions of the MacPherson report identified institutional racism, which meant the "collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. This can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness, and racist stereotyping which disadvantages minority ethnic people" (MacPherson, cited in Abdallah 1999: 37).

The same issues have been raised in France. The antagonistic relations between the police and minority communities have been identified as a recurrent issue of humiliation, particularly in the case of identity checks and "security searches", disrespectful language, handcuffing, and so many "factors which have led to incidents deteriorating" (CNDS 2004: 508-509). Since they are more likely than average to experience identity checks (Centre d'Analyse Stratégique 2006a: 11), populations of immigrant origin in France experience things in a similar way to British ethnic minorities in their relations with the police. Although the MacPherson report identified institutional racism in the police force, it did not question the use of "stop-and-search" measures, which allow police officers to search individuals in cases of "reasonable suspicion", with young black males being stopped, on average, eight times more often than their white counterparts (Abdallah 1999: 36). However, the police in London have, for instance, taken this issue seriously, by offering some 30,000 officers training in diversity and ethnic relations at the start of the new millennium (Deputy Metropolitan Police Commissioner 2002).

Institutions as a mirror of society: the armed forces and minorities

The issue of the relations between minority groups and state institutions does not only concern types of conflict which can develop in societies affected by racism and

where discrimination penetrates institutions, which otherwise act as a basis for citizenship and agents of integration. It also concerns the way in which these institutions represent the sociological make-up of society.

From this perspective, the example of the armed forces is an interesting one. Effectively, the French and British armed forces have for a long time represented to ideal types in this matter: on the one hand, there is the French armed forces – shown in the Battle of Valmy in 1792 to be an “armed nation” (Castles 1998; Bertossi 2007c: 193-195) – which has been based on compulsory conscription since 1905 and has been perceived as a force for the integration of the French population, only recognising individuals and being blind to the issue of ethnicity; on the other hand, there are the British armed forces, which has for a long time been professional, and which has set “ethnic” recruitment targets so that the composition of its ranks meets requirements, since only 1.3% of those joining the armed forces are from minorities, whilst minorities make up 6% of the national population. In other words, in one case the Republican armed forces aim to be an institution focusing on integration which is blind to ethnic difference, since the armed forces serve the nation, which is directly linked to the historically dominant Republican ideology. In the other case, the armed forces aim above all to be in the image of the nation, and the Ministry of Defence has taken measures to increase the representation of minorities by 1% each year, until it reaches the proportion minorities make up of the British population.

Although they have for a long time been in contrast, these two models have ended up converging ever since the French armed forces became professional. This move towards the professionalisation of the armed forces has been seen in the need to replace conscripts after military service was ended in 1997, particularly where conscripts were in their greatest numbers (in the navy and army). This has led to a diversification in the recruitment process, with many soldiers of foreign origin entering the armed forces after being recruited in urban areas with high levels of unemployment. Although it has only one recruitment centre in each administrative department, the land-based army has opened two of them in the Seine-Saint-Denis department in the Paris region, which has the largest concentration of people of immigrant origin (and “Muslims”) in France. Here, once again administrative units are being used to target populations. With “targeted” recruitment, the military institution developed its recruitment strategy and rediscovered its social function in the integration process. This took place after the strong link between the armed forces and the nation was lost when the conscription of a whole age group of men (but not women) came to an end. To rebuild this link between the armed forces and the nation, the Ministry of Defence portrayed the armed forces as a “second chance” for people who had “integration problems” (Biville 1990).

Yet, without speaking of “institutional racism”, the situation of these people of foreign origin shows how social relations have become ethnicised even within the French military institutions (Bertossi and Wihtol de Wenden 2007: 135-183). On the one hand, new recruits find, while volunteering in the military, an escape from the discrimination they encounter in the civilian labour market as well as professional training and qualifications, which give them a greater degree of socio-economic integration upon returning to civilian life. On the other hand, they are faced with racism from their peers and their immediate superiors (mainly from non-commissioned officers), practices felt to be discriminatory (being posted to particular places, career development, recognition of abilities) and problems practising Islam (despite laws encompassing Islam since 1992, which were applied less and less often towards the end of the 1990s). Right up until the spring of 2006, the armed forces employed Catholic, Protestant and Jewish chaplains, but none for Muslims.

Amid these racist and discriminatory practices, people of immigrant origin have to deal with being given the image of the foreigner, of belonging to an ethnic group, of being a member of a religious minority (Islam), whilst most of these people want to break away from this stigmatisation and see themselves simply as “French citizens”. This brings up the problem of cohesion in the French armed forces, which is an institution faced with the need to deal with ethnic discrimination in a better way in order to continue attracting young French people of foreign origin – whom it needs – into the profession, and to show itself to be open to the issue of ethno-cultural and religious diversity in order to present itself as a model institution based on the Republican principles of citizenship and secularism (Bertossi and Wihtol de Wenden 2007: 43-72).

The situation in Britain demonstrates the specific problems associated with an institution whose performance depends on its ability to attract minority communities. According to a study conducted among 300 Hindus in the West Midlands and South-East England, only 20% of those interviewed thought that “the armed forces have tried to improve race relations” and 89% thought that it was “not possible to practice one’s religion” (Hussain and Hishaq 2002a). A similar study among the Sikh minority revealed that 31% did not intend joining the armed forces due to racism in the army (Hussain and Hishaq 2002b). Whilst the British armed forces are heavily involved in fighting for equal opportunities, the recruitment of minorities has remained weak. Conversely, whilst the French armed forces have long claimed to be an institution focused on integration – “France’s biggest employer” – it is now facing the issue of the representation of ethnic minorities within its structure in order to hold on to its ties with the nation and reinvent its social function as a force for integration.

Yet soldiers remain insensitive to the treatment of recruits of foreign origin, and people have for a long time failed to recognise the issue of Islam.

It can be seen in the armed forces, but it can also extend to other institutions such as the education system or the national health service. The issue of managing state institutions goes well beyond the big competing ideologies of the Republic and race relations, which share a common problem: the need to bind national institutions to the whole of society, otherwise there is a risk that these institutions will no longer be in a position to generate integration, will no longer be able to function properly, and will lose their social function and legitimacy.

Records and representation

Finally, the area where there is undoubtedly the greatest contrast between public treatment in the field of integration in France and Britain is the use of statistics. This concerns everything we have looked at and remains the “hard edge” between the two countries. The issue is of how we account for the fact that there are minorities, how we describe them and how we measure them.

In the final analysis, these issues relate to the way in which French and British societies see themselves as societies focused on integration, where the “issue of integration” is related to the presence of communities whose origins are in postcolonial immigration, which makes these societies multicultural as a matter of fact. At first glance, this diversity is almost the same in absolute terms and very close in terms of the proportions of different groups among the general population. In France, 8.1% of the population were “immigrants” in 2004 (4.9 million people), 40% of whom had French nationality and 40% of whom were concentrated in the Paris region (Ile-de-France) (INSEE 2006). On the other side of the Channel, “ethnic minorities” made up 6.9% of the population in 2001 (4.6 million people), 45% of whom lived in the London area. This broadly demonstrates the way in which the two countries have had a similar history of colonialism, postcolonial immigration and settlement, have experienced a diversification in the social make-up of their national political identities, and have responded to this diversity through a programme of common citizenship, but have also implemented border controls.

We have seen how citizenship, as a way of granting equal rights, quickly contributed to the politicisation of the themes of immigration and racism, and drew the lines of British policy in the fields of anti-discrimination and promoting “good race relations”. Conversely, French citizenship has never been able to completely separate itself from a culturalist understanding of national identity, which is of course also present in Britain, but which has, in France,

encompassed all dominant ideas surrounding equal rights, which has long been justified by the political legacy of the 1789 Revolution. According to this vision, which was formed in the 1980s, to be considered “equal”, populations of immigrant origin must become “similar” and must be dealt with with no reference to their origin, including in national statistics. This discourse was partially softened at the end of the 1990s, when the phenomenon of ethnic and religious discrimination was “discovered”, because the official citizenship of these “new Frenchmen” did not mean that they escaped being stigmatised and treated in a discriminatory way. So, how is it possible to measure the extent of discrimination if it is also impossible to record the “identities” certain groups have been given by dominant society, “identities” which have been the reason for their differential treatment in the labour market, housing and academic and professional life?

The issue is being raised in France thirty years after it was raised in Britain. As a result, the current methods of measuring “diversity” using national statistics are particularly different in the two countries. On the one hand, ethnic, racial and religious categories are in Britain official and legitimate public categories, are an indispensable tool for measuring the material inequalities experienced by minorities and are necessary for steering public integration policy. A question about ethnic origin was introduced in the 1991 census (after a first attempt in 1981). In 2001, the categories put forward were, in particular, “white”, “mixed-race”, “Indian”, “Pakistani”, “Bangladeshi”, “Caribbean”, “African”, “other black”, “Chinese”, and “other Asian”, combining categories based on national origin, geographical origin, ethnicity, race and colour – which raises the epistemological issue of how these categories were constructed, particularly in the way in which they perpetuate prejudices which structure the issue of race in British society. A question about religion was added in 2001.

For all this, and despite their heterogeneity, these categories give a precise idea of the access minorities have in different sectors where redistribution takes place, such as housing, education, employment and healthcare. Calculated in this way, the process of measuring “diversity” is tied to the fact that individuals belong to minority groups, that is they are British citizens. It is not only about the census: the practice of ethnic monitoring by state institutions (schools, hospitals, prisons), local authorities and businesses grew in the 1980s and worked alongside policies in the areas of race relations and equal opportunities, particularly in recruitment procedures.

In France, however, official statistics have included no criteria about minorities and only make a distinction between the “French”, “immigrants” (those who were born foreigners in foreign countries and who have or have not acquired French nationality) and “foreigners”

(people who aren't French). Based on records of nationality and country of birth, "diversity" in France is still linked to migration and nationality. Besides the fact that these categories also perpetuate dominant social perceptions as regards integration – which focus more on immigration than on the citizenship of these "new Frenchmen" – the use of French statistics as they exist causes a more serious problem in the field of anti-discrimination: the shelf life of these categories is limited because they will not be able to take account indefinitely of the "descendants of the descendants of immigrants" (Simon and Clément 2006: 68), who will continue experiencing discrimination but will disappear from national statistics. Another problem resides in the fact that these categories do not allow for systematic information about the "phenotype" or "colour" of different populations to be recorded, which can also be a reason for discrimination, such as in the case of French citizens in the overseas departments (DOMs).

One final thing characterises the French system. The very use, in certain institutions, of nationality and place of birth creates "greater suspicion in the people handling a file" (Simon and Clément 2006: 35). Out of fear of discriminating against someone, this type of monitoring is avoided, which again reinforces the failure of anti-discrimination policies. However, the two issues of "ethnic data" and anti-discrimination are closely linked. In a statement on 9 July 2005, the Commission Nationale de l'Informatique et des Libertés (CNIL, the French national data protection agency) stated that there was nothing really preventing institutions from using new, more explicitly "ethnic" categories in France as long as there was no "reference to national 'ethno-racial' typologies" in national statistics and the legislature clarified its "stance" in relation to anti-discrimination (Simon and Clément 2006: 36). Without this re-assessment, knowledge of discrimination in France will remain very patchy, since it currently rests on personal "accounts", tests organised by certain organisations, and qualitative research on the structure of racial, ethnic and religious discrimination, which does not show the scale of the problem if it is out of sight (Cedey and Foroni 2006). This is where the situations in France and Britain differ in a pragmatic way. However, because France is itself beginning to embark on anti-discrimination policies, the issues related to the treatment and measurement of "diversity" are converging in a surprising way, if only in debates surrounding ethnicity and integration practices.

These debates surrounding the categorisation and measurement of "diversity" are also important for another reason. Besides the fact that it is necessary to steer anti-discrimination policy, statistical data on "diversity" is directly linked to the issue of the relations between minority groups and national institutions, which as we have seen encourage citizenship but are also being challenged in relation to their social function in the

integration process. Here, there is another issue at play in the use of statistical data, which is not related to the different conceptions multicultural societies have in relation to their integration policies, but to the actual representation minorities have within state institutions in dominant society. As we have seen in the case of the French armed forces, the absence of data in relation to populations of immigrant origin prevents anybody from demonstrating a link between this institution and the rest of society (including populations of immigrant origin) and the attachment of minority groups to an institution that is important in the domain of citizenship.

This is an overall problem and it concerns the future of citizenship in both countries. Despite the “French integration model” being used as the main argument against the use of ethnic data, the representation of populations of immigrant origin in French state institutions is very low. A case in point is the fact that the country had to wait until the 2004 senatorial elections to see three representatives of immigrant origin elected to Parliament for the first time. The same observation applies to local politics and the European Parliament (Geisser 1997; Garbaye 2005; Bertossi 2005). The monitoring of diversity as a way of bolstering the representation of minority groups is at the centre of British integration policy, but, like in France, the problem is still that they are under-represented: in 2002, Ian Blair showed that, out of 50 police chiefs, only one was from a minority group. This was the case with only 12 district judges out of 1,200 being from ethnic minorities, and in the Church of England, where only 3 bishops came from an ethnic minority group. In the High Court, there were no black or Asian judges (Deputy Police Commissioner 2002).

As a result, representing diversity by way of categories allows it to be measured and is also a way of setting targets for the representation, in the liberal sense of the notion, of diversity in institutional and political life. This shows how complex the agenda of empowering and integrating minority populations through citizenship actually is. In both countries, the agenda is less an issue of ethnic or religious minorities “refusing to integrate” (as it is often portrayed in the mainstream debate of electoral campaigns and the media) and the “identity” of these minority groups being an obstacle to integration, than an issue of opportunities being offered by French and British society in terms of equal access to rights and economic, social, political and institutional resources.

This is something shared by France and Britain, as the riots in French towns and cities in the autumn of 2005 and the urban violence in England in 2001 and 2005 have reminded us. The fact that it has recognised this is the reason why British integration policy has developed and remains the most progressive in Europe today. The same analysis emerged in France in the

late 1990s and encouraged a fresh national debate surrounding the scale of racial and religious discrimination. Nevertheless, this liberal approach to citizenship for minorities is not (in the case of France) or no longer (in the case of Britain) based on consensus. The attacks in London on 5 July 2005 reinforced the critique of race relations policy. Islam has also been perceived as a “threat” to national identity in French public opinion. Hence the paradoxical situation which comes out of a comparison between French and British policy in the fields of citizenship and integration: on the one hand, there is a liberal stance, whereby individuals are given rights through anti-discrimination and the promotion of equal opportunities; on the other hand, there is a conservative stance based on security, which sees cultural and religious diversity as a challenge to “shared values” and national identity.

It is here that France and Britain are converging and there is an identical challenge to be drawn out, which goes well beyond the “mirror image” of these two so-called “national integration philosophies”. By shifting the framework of comparison towards a situation where there are fewer *a priori* normative oppositions; by identifying the social, cultural and political issues in each political framework in order to seek an effective form of citizenship; and by showing the similarities between the policies which have been developed in France and Britain in order to give citizenship to people who have often been treated as second-class citizens, it is possible to make sense of the experiences these two countries have had in relation to integration and to see how each “national framework” is ultimately limited.

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