Race Politics in Britain and France

Ideas and Policymaking since the 1960s

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Introduction

We live in an age of diversity. Relatively porous borders and inexpensive international transportation have promoted ethnic mixing on every continent. Post-World War II migration has unfurled to the tremendous benefit of hundreds of millions of people. It has generated economic prosperity, provided new cultural repertoires, and enhanced understanding of different values and worldviews. Diversity is celebrated in the media, in schools and universities, and in the workplace as the essence of the contemporary world.

At the same time as diversity brings indisputable advantages, however, it also generates challenges. Fears related to economic well-being, social status, or national identity can make people suspicious of difference and can heighten tension across what anthropologist Clifford Geertz (1973) refers to as primordial lines – those of race, ethnicity, language, region, and religion.[1] In particular, racism in its many guises has singled out individuals and groups for differential treatment. It has inspired quotidian injustices, structural disadvantages, and passionate hatreds. In its extreme forms, racism has resulted in violence, murder, and genocide. Coping with racism is therefore a crucial challenge for enlightened societies that seek to reap the rewards of diversity while minimizing its dangers.

Throughout most of the second half of the twentieth century, people concerned with race and racism have focused primarily on places like the Jim Crow United States or apartheid South Africa, and on the civil rights and anticolonial movements that have fought racial domination around

[1] Geertz (1973: 261–3) identifies the following primordial attachments: assumed blood ties, race, language, region, religion, and custom.

TABLE 1. *Foreign Population in Selected European Countries (Absolute and Percent of Total Population)*

	1960		1976		1990		1998	
	Absolute	%	Absolute	%	Absolute	%	Absolute	%
France	–	4.7	3,442	6.6	3,608	6.4	3,697	6.3
Germany	686	1.2	3,948	6.4	5,242	8.2	7,320	8.9
Great Britain	–	–	1,542	2.9	1,875	3.3	2,208	3.8
Netherlands	118	1.0	351	2.6	692	4.6	662	4.2

Sources: Soysal (1994: 23) for 1960, 1976, and 1990; SOPEMI (2000) for 1998 foreign population, except France; INSEE (1999) for 1998 French foreign population (http://www.recensement.insee.fr/); United Nations (1998) for 1998 total populations.

the world.[2] Almost one hundred years ago W. E. B. Du Bois famously proclaimed that "the problem of the twentieth century is the problem of the color line," defined as "the relation of the darker to the lighter races of men in Asia and Africa, in America and in the islands of the sea" (Du Bois 1989 [1903]: 10). As perceptive as Du Bois and other scholars have been, they have typically overlooked one troubled region now faced with similar tensions – Western Europe.

In recent decades, European countries have been forced to confront racism, largely due to the influx of millions of "nonwhite" immigrants since World War II.[3] Of course, in comparison to the United States, South Africa, or Brazil, Europe does not appear to be highly ethnically diverse. Nonetheless, it is incorrect to perceive Britain, France, Germany, the Netherlands, and most other West European countries as racially homogeneous. Over the past half-century, the percentage of ethnic minorities in these states has climbed significantly, as Table 1 suggests. Foreigners comprise between 3 and 10 percent of many European countries, and although not all of those foreigners are nonwhite, many nonwhites are not captured in statistics on foreigners because they are full citizens of these states. It is difficult to trace precisely the color line across the European continent, but as Tables 1 and 3 illustrate for Britain and France, ethnic minorities make up considerable percentages of national

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[2] For one of the best of the recent comparative books in this vein, see Marx (1998). For a clarion call for decolonization, see Fanon (1966 [1961]).

[3] It is difficult to find neutral, accurate terms to describe populations in a book on this topic. With full knowledge of the drawbacks of terms such as nonwhite and ethnic minority, I use them here – synonymously and usually without quotation marks – for the sake of simplicity and because they convey to most readers a common-sense understanding of the population to which I refer.

TABLE 2. *Population in Britain by Ethnic Group, 1991 (Absolute and Percent of Total Population)*

	Absolute	%
Black	890,700	1.6
Chinese and others	644,700	1.2
South Asian	1,497,600	2.7
Total ethnic minorities	3,015,100	5.5

Source: NEMDA Key data on minority and ethnic groups in Great Britain (http://www.warwick.ac.uk/~errac/keyinf.htm).

TABLE 3. *French Residents Born outside of France by Region, 1999 (Absolute and Percent of Total Population)*

	Absolute	%
Born in the EU	1,839,606	3.1
Born outside the EU	4,028,636	6.9
Total born outside France	5,868,242	10.0

Source: INSEE (1999) (http://www.recensement.insee.fr/).

populations. Moreover, because of their concentration in metropolitan areas, they have become an extremely visible and integral part of life in most major European cities.

European countries were not always quick to recognize or to embrace their multiculturalism. By the last two decades of the twentieth century, however, the issues associated with diversity began to rise to the fore of political agendas across the continent. Most frequently, this manifested itself as a concern about immigration and immigrant integration. Because much of the present ethnic diversity in Europe owes its origin to large-scale postwar immigration, the topic of racism must in part be seen as linked to issues of immigrant integration. Consequently, any exploration of race in Europe must orient itself within (and draw inspiration from) the field of integration studies, defined broadly to include scholarship on issues of civil, social, and political rights; citizenship acquisition; and overviews of policies toward immigrants in one or more countries.

Numerous works have demonstrated that countries faced with similar challenges of integration are capable of dramatically different responses, a conclusion that also holds for the domain of race policies examined in this book. Cross-national divergence in the sphere of European immigration policies was highlighted as early as the late 1970s by Gary Freeman,

who noted the more economic approach of the French as contrasted with the more racial approach of the British (1979: 309). Rogers Brubaker's (1992) landmark study of the distinction between Germany's ethnic and France's civic conceptions of citizenship helped to draw renewed attention to integration policies across European countries in the 1990s. More recent research has underlined the different national approaches to incorporation (Soysal 1994), citizenship (Thomas 1998), identity negotiation (Kastoryano 1996), managing immigrant political activity (Ireland 1994, Soysal 1994), and integration broadly defined (Favell 1998, Joppke 1999, Lapeyronnie 1993, Schnapper 1992, Todd 1994).[4] To the extent that works on integration of immigrants have treated issues of race and racism, however, they have done so only partially. The way a country fights racism is typically analyzed in passing, with much more attention devoted to the rights accorded to immigrants or to the nation's citizenship policies.

One major goal of this book is to turn the spotlight of inquiry squarely on race policies. Race policies are those that seek to manage the issues that arise from racial and ethnic diversity, the most prominent of which is racism itself. Although concerns about race and racism cannot be wholly divorced from issues of immigrant integration (as is often done in North America), they must be seen as semi-autonomous, because race policies are not simply targeted at immigrants. Moreover, as growing percentages of ethnic minorities within Europe become citizens through birth or naturalization, race and racism will stake out increasing independence from concerns about immigration and integration. In short, sorting through the complex relationship between immigration, integration, and race in Europe does indeed demonstrate that there are interactions between the spheres, but it also draws attention to the importance of race policies as objects of inquiry in their own right.

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[4] Equally important as background for this study and for my thinking are works that investigate immigration policies per se, highlighting similarities and differences across European countries (Guiraudon 2000, Hollifield 1992, Money 1999), cross-national studies of race relations that compare a European country to the United States (Glazer and Young 1983, Katznelson 1976, Lamont 2000, Lieberman 2001), and individual country studies of integration in Britain and France (Feldblum 1999, Hansen 2000, Hargreaves 1995, Layton-Henry 1992, Modood and Berthoud 1997, Paul 1997, Silverman 1992, Tribalat 1995, Weil 1991). In addition to the book-length treatments, there have been a number of shorter explorations of comparative aspects of integration that also serve as orientation points for this study (Crowley 1993, Lloyd 1991, Weil and Crowley 1994, Weir 1995).

Even a cursory glance reveals that racism is a critical issue in Europe, deserving of much more attention than it has traditionally garnered. Fourteen percent of respondents in a 2000 European Union (EU) survey were categorized by their opinions as openly intolerant because they "display strong negative attitudes towards minority groups. They feel disturbed by people from different minority groups and see minorities as having no positive effects on the enrichment of society" (SORA 2001: 24). Extrapolating from this information implies that there are tens of millions of EU citizens that feel this way. Beyond the hard core of intolerant Europeans lies a soft core of residents who are skeptical of the value of ethnic pluralism. When asked if their country's diversity in terms of race, religion, and culture added to its strengths, 37 percent of respondents tended to disagree (SORA 2001: 45). Although it would be wrong to conclude from this data that racism is rampant in Europe, it is clear that there are many millions of people in the EU who are openly dubious about diversity, and among them, potentially millions who are actively racist in one form or another.

Such racism manifests itself in myriad ways. Far right political parties have elbowed their way to notoriety in a number of countries in recent decades, capitalizing on anti-immigrant sentiment and feelings of economic and personal insecurity to capture millions of votes in local and national elections.[5] France's National Front (FN) leader Jean-Marie Le Pen has drawn both fire and publicity for statements about the gas chambers of the Holocaust being a mere "detail of history" and for his open declaration about the "inequality of the races."[6] Jörg Haider's Freedom Party won 27 percent of the vote in the 1999 Austrian elections, catapulting his party into a share of power and instigating a European Union crisis as Austria's EU counterparts ostracized a government it suspected of taking a turn toward fascism.[7]

The statements of politicians and the support of their voters are not the only troubling turns of events. The quotidian injustices of discrimination and the effects of racial harassment and violence are also widely felt. Local antidiscrimination bureaus in the Netherlands have registered

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[5] For accounts of the success of far right parties in Europe see especially Kitschelt (1995), Betz (1994) and the contributions in Betz and Immerfall (1998) and Schain, Zolberg, and Hossay (in press).

[6] *Le Monde*, September 15, 1987; *Le Monde*, September 2, 1996.

[7] *International Herald Tribune*, June 23, 2000.

an average of 3,000 complaints per year over the past few years,[8] and a hotline set up by the French government to assist victims of discrimination was overwhelmed by 13,933 phone calls in its first five months (Commission Nationale Consultative des Droits de l'Homme 2001: 131). The British police recorded 47,814 racial incidents in 1999/2000,[9] of which 21,750 were categorized as "racially aggravated offences," such as assault, criminal damage, harassment and wounding.[10] In Germany, the Federal Criminal Office reported 10,037 proven or suspected right wing crimes in 1999, a figure that rose almost 40 percent in 2000.[11] A particularly brutal instance of racially motivated violence occurred on June 11, 2000 in Dessau, Germany. Three skinheads attacked Alberto Adriano, a black immigrant married to a German woman and father to their child, Gabriel. They threw him down, kicked him in the head until they dislodged an eye, and then trampled his body, leaving him dead. In a final act of contempt, they stripped him of his pants and hung them from a bush.[12]

Given such a grim accounting, it is surprising that racism has been so little noticed for so long. As the following chapters of this book demonstrate, states began paying attention to this issue in the 1960s and 1970s.[13] Yet it has really been only in the past decade that the problems of diversity associated with race have generated substantial government and scholarly interest across the continent. These issues have steadily climbed up the political agenda in a number of countries since the 1990s and remain salient today. In addition to state-sponsored efforts, the European Union has begun to address racism at the multi-national level. 1997 was an

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[8] U.S. Department of State, Bureau of Democracy, Human Rights, and Labor, Releases, Human Rights Report, 2000, Europe and the New Independent States, Country Report, The Netherlands. Available at http://www.state.gov/g/drl/rls/hrrpt/2000/eur/index.cfm?docid=872.

[9] Defined as "any incident which is perceived to be racist by the victim or any other person."

[10] Statistics on Race and the Criminal Justice System (2000: 49, 52), available at http://www.homeoffice.gov.uk/rds/pdfs/s95race00.pdf.

[11] U.S. Department of State, Bureau of Democracy, Human Rights, and Labor, Releases, Human Rights Report, 2000, Europe and the New Independent States, Country Report, Germany. Available at http://www.state.gov/g/drl/rls/hrrpt/2000/eur/index.cfm?docid=765.

[12] *The New York Times*, August 21, 2000.

[13] During those decades, the United Nations also became active in the field. In 1965 it passed the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD) and it designated 1971 as the International Year for Action to Combat Racism and Racial Discrimination. For an introduction to the UN's antiracism efforts, see Banton (1996).

especially pivotal year, as it saw the establishment of the European Monitoring Center on Racism and Xenophobia and the passage of a provision into the Treaty of Amsterdam that permitted the EU to combat discrimination based on racial or ethnic origin – all this in the officially designated European Year Against Racism. As racism becomes the subject of political scrutiny and action, it is necessary to understand how the issue rose to prominence and what tools have been used to manage this particular challenge.

This book seeks to illuminate European race policies by undertaking a detailed case study of their development in Britain and France. Before retracing the history of policymaking in these countries, it is important to define race policies precisely, and to explain why Britain and France are fruitful locations for an examination of this topic. Race policies are policies aimed at managing the challenges of racism and race relations in diverse societies.[14] Promoting intergroup harmony and vitiating racism can be done in a wide variety of ways. Grass-roots initiatives by civil society groups, conscious efforts by private industries to achieve racial equality, the teaching tolerance in schools, and of international gatherings of experts can all make progress toward these goals. National policies and laws designed to fight racism and to influence interactions across racial or ethnic boundaries, however, are among the most important tools a society has at its disposal. These race policies respond to actual episodes of racism, particularly those that shock us as a nation or terrorize their victims. They set a public tone for what will or will not be tolerated, sending signals to potential perpetrators as well as to society as a whole. Race policies are certainly not the only forces affecting racism or race relations. However, a close examination of national race policies offers crucial insights into these pressing concerns.

Britain and France are particularly important countries to consider in the European context. Among European nations, they have been at the forefront of the field of race policies, having developed their laws and administrative structures in the 1960s and 1970s. Each country's elite proudly asserts that its system is the most advanced available; and each country stands out as a potential exemplar for other continental nations and for the European Union as a whole. Yet the two states diverge substantially in the types of institutions they have established. While France maintains a strict color-blind code, Britain has accepted a number of

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[14] By race relations, I refer to the interactions of people across boundaries commonly thought of as racial or ethnic.

race-conscious policies. Whereas France has traditionally preferred to use the criminal law to fight racism, Britain relies heavily on the civil law for punishing discrimination. Britain has erected a quasigovernmental organization to encourage good race relations, in contrast to the pride of place granted to non-governmental associations in France's antiracist structures.

Why these differences? Factors that at first blush might seem to account for such policy divergence do not offer satisfactory explanations. Britain and France share more similarities than differences in their economies and democratic political systems; both were leading colonial powers and experienced decolonization at approximately the same time; and both received large and comparable quantities of ethnic minority immigrants in the decades following World War II (see Hansen 2000, Rose 1969, Weil 1995).[15] Moreover, Britain and France – in contrast to other large European countries such as Germany – have turned their minority populations into citizens at a relatively rapid rate (Brubaker 1992; Hansen 2000).[16] Although Britain's percentage of ethnic minority citizens is greater than France's, this has by no means dictated the different outcomes in the two countries. Britain and France are not perfectly parallel societies; nevertheless, it is difficult to find two countries that share more in common along so many critical dimensions. Policy variation in light of such economic and demographic similarities demands further inquiry.

The goal of this book is to describe, analyze, and explain the differences between the British "race relations" model and the French "antiracism"

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[15] By 1966, England and Wales combined were estimated to have just over 900,000 "coloured" residents (Rose 1969: Appendix table III.v.). In 1968, the French census enumerated just under 700,000 foreign residents of African or Asian origin (Weil 1995: Appendix VI), a count that did not include ethnic minority citizens (for which France keeps no statistics).

[16] As of the 1991 census, 1.42 of the 3.02 million total ethnic minority population in Britain were native born and therefore UK citizens (Salt 1996: 132). Combined New Commonwealth and non-European alien naturalization in the UK averaged 56,400 per year between 1983 and 1994 inclusive (Hansen 1997: 341). Foreign nationals of African or Asian origin in France totaled 2,069,890 in 1990. Nationality acquisitions in France averaged 50,242 per year from 1980–9 and rose to a 1990–3 average of 70,487 per year. These figures include acquisitions of nationality from all immigrant groups, of which Africans and Asians together comprised 57.4 percent in 1990 (Weil 1995: Appendices VI and VII). In contrast, annual acquisitions of citizenship for the combined group of Turks, Yugoslavs, Italians, Greeks, and Spanish (the core immigrant groups) in Germany from 1981–8 averaged 4,500 (Brubaker 1992: 83).

approach. Doing so illuminates not only the cases at hand, but also proves relevant at a broader geographic level. Both in Europe and North America, scholars, activists and policymakers are searching for solutions to problems of racism. Britain and France have over three decades of experience with their antidiscrimination institutions. Examining and understanding how these policies came into being, how and why they differ, and what effects they have had in their settings will hopefully enrich intellectual and policy debates in all advanced industrialized countries struggling with this challenge of diversity.

Race Relations Versus Antiracism: The British and French Approaches Compared

What are the principal differences between the British race relations approach and the French antiracism model? British and French race policies diverge along a variety of major and minor dimensions.[17] While many of the smaller differences are revealed in the following chapters, this project focuses its attention on the most significant differences between the two nations. In order to identify the critical policies, I look to the passage of legislation that has defined race policies in each country. British race relations legislation, established through three major rounds in 1965, 1968, and 1976, has formed the core of Britain's race institutions, setting out most of the general rules and founding many of the official organizations devoted to race issues. France passed its cornerstone antiracism law in 1972, and then passed two subsequent laws in 1978 and 1990 that reinforce its institutions.[18]

Before looking to race policy differences, it is helpful to distinguish among access, expressive, and physical racism. Access racism involves discrimination in employment, housing, and provision of goods and services; expressive racism is manifested through inflammatory statements or written expressions made against individuals or groups; and physical racism relates to attacks against persons or destruction of property

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[17] See also Lloyd (1991), Crowley (1993).

[18] Each country has other sources of race policies, such as those that emanate from the cabinet or bureaucracies. These policies will be described in passing, although no attempt is made to cover them exhaustively since the primary race institutions in each country have their origins in the passage of antiracist legislation. Each country is also in the process of adding new elements to its race structures. Because these are ongoing developments, they cannot be analyzed as exhaustively as previous laws. They are, however, treated in the concluding chapter.

motivated by racial hatred.[19] At first blush, policies in Britain and France appear to be quite similar, as each country has outlawed essentially the same gamut of racist crimes, penalizing especially access and expressive racism, while resisting new laws to counter physical racism. Moreover, in contrast to the United States, each country has rejected "hard" affirmative action.[20] But these surface similarities mask important differences between the countries. Five central factors distinguish the two countries:

1. The legal procedures used to punish certain types of racist infractions
2. The actors responsible for spearheading the fight against discrimination
3. The existence (or absence) of punishment for denying the Holocaust
4. The existence (or absence) of penalties depriving convicted racists of their civil rights
5. The existence (or absence) of race-conscious policies covering indirect discrimination, positive action, and ethnic monitoring.

Access racism is punished in a significantly different manner on either side of the English Channel. Britain uses the civil law to penalize acts of discrimination in employment, housing, and provision of goods and services. French laws have favored the punishment of these kinds of racist acts by the criminal law.[21] The use of criminal versus civil law has significant implications. In 1991, for example, British civil procedures led to 1,471 cases of employment-related discrimination. By contrast, in 1991 employment-related convictions in France totaled four (Banton 1994: 485). These figures reflect the fact that getting convictions for access racism is extremely difficult when using criminal standards of proof (Costa-Lascoux 1994: 26, Vourc'h, de Rudder, and Tripier 1996: 159).[22]

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[19] This typology is intended to facilitate discussion. It is akin to the distinction between discrimination, hate speech, and hate crimes, although it differs from this distinction based upon how Britain and France categorize certain offenses.

[20] Hard affirmative action involves hiring goals required of government contractors, accepted by consent decrees or ordered by courts, and often involves a deliberate adjustment of standards in employment and education (Teles 1998: 1004).

[21] In the past few years, France has turned its attention to the potential for punishing access racism through the civil law, a move discussed in the concluding chapter.

[22] These figures are not perfectly comparable, however, since not all British cases resulted in convictions and since the number of French convictions is higher than officially enumerated, given that, as Costa-Lascoux (1994: 376) notes, the statistics only contain the primary offense for which the guilty party was convicted. Nevertheless, the cross-national differences in cases brought to court and convictions obtained remains substantial.

TABLE 4. *Race Policies in Great Britain and France*

Race Policies	Britain	France
Criminal or civil law predominant for access racism?	Civil	Criminal
Help to victims from:	Administrative agency	Non-governmental groups
Provision against Holocaust denial?	No	Yes
Provisions depriving racists of civil rights?	No	Yes
Race-conscious policies:		
• positive action?	Yes	No
• provisions against indirect discrimination?	Yes	No/Yes*
• ethnic monitoring?	Yes	No

Note: *No for the majority of the postwar years; yes as of law 2001–1066 of November 16, 2001.

The second central dimension along which policy in the two countries can be contrasted is in the locus of responsibility for combating racism. In France, official responsibility is shared by both the state and civil society. Because France uses the criminal law to punish acts of racism, the state (the police and the courts) has, in theory, pride of place in dealing with race problems. French laws, however, also allow nongovernmental antiracist groups to instigate criminal proceedings for racist crimes, even without the state's approval. Approximately 50 percent of racism cases are brought into the courts – or at least to the public prosecutor's attention – by the antiracist associations, which gives them substantial influence in this policy domain (Costa-Lascoux 1994: 376).

Britain, by contrast, established a quasigovernmental organization that takes the lead in dealing with race relations. The Commission for Racial Equality (CRE) has a budget of some £15 million per year and a staff of over one hundred full-time workers. It undertakes national campaigns against discrimination, collects and analyzes statistics on discrimination, publishes an annual report on racism in Britain, funds local bodies that fight racism, helps individual victims of racism with legal advice, and, most important, it undertakes audits of industries or government departments it suspects are acting in a discriminatory manner. Although the CRE is by no measure a powerful national institution, it has more leverage and

authority than its French counterparts to combat racism and do so in a wider variety of spheres.[23]

Third, the French antiracism law of 1990 rendered it illegal to contest the existence of crimes against humanity committed during World War II. No such provision exists in Britain. The French law aims to punish revisionist historians who promote anti-Semitic views through denial of the Holocaust. Yet, to the dismay of many, it has also created an "official" interpretation of history, dissent from which can result in fines or imprisonment – a highly controversial step in an open democracy. Fourth, the same French law of 1990 provided for sanctions depriving convicted racists (at the judge's discretion) of certain civil rights. Although the right to vote cannot be withdrawn,[24] the right to stand for public office can be denied to an individual if he or she has been found guilty of racism. To some, this may seem a reasonable and perhaps necessary provision against demagoguery; to others, however, this is a dangerous affront to freedom of speech which risks being put to highly political uses.

Finally, Britain has developed a series of race-conscious policies that France has eschewed. Certain British policies focus on categorizing, protecting, and aiding minorities defined by group rather than by individual characteristics. Indirect discrimination, for example, concerns acts of racism that affect groups of individuals defined by race, rather than those perpetrated against a particular individual. Classic examples, drawn from 1960s America, are literacy tests or educational requirements that had a disparate negative impact on blacks trying to vote or find a job.[25] Indirect discrimination has been outlawed for over twenty-five years in Britain. By contrast, in France the concept has only entered into public and elite consciousness in recent years. Positive action – "soft" forms of affirmative action such as actively recruiting minority job applicants and targeting training resources at minorities – is permitted in Britain to aid disadvantaged racial groups, but is strictly forbidden in France. Britain has also begun to collect extensive ethnic statistics, even incorporating an ethnic question into its 1991 census; France, on the other hand, passed a law

[23] France has three government-sponsored organizations that have issues of racism within their bailiwick: the National Consultative Commission on Human Rights (CNCDH), the recently formed Group for the Study and Fight against Discrimination (GELD), and the recently renamed Fund for Action and Support for Integration and the Struggle against Discriminations (FASILD). None is as influential as Britain's CRE.

[24] This possibility was initially considered.

[25] See the U.S. Supreme Court case Griggs v. Duke Power, 401 U.S. 424 (1971).

in 1978 that virtually prohibits collection of ethnic data. Although the effects of color-blind versus race-conscious policies on immigrant and minority integration are contested and uncertain, the difference in approach between Britain and France is likely to affect both the degree of ethnic self-identification and the strength of minority mobilization in each country.[26]

How can such differences be explained?

Frames and Race Policy Outcomes

To understand why Britain and France have chosen different paths in the fight against racism, it is essential to recognize that instituting race policies requires a process of policymaking. Turning to the literature on comparative policymaking can therefore help to generate insights into race policy differences between the two countries. In order to account for the trajectory of race policies in these countries, I begin by examining three popular schools of thought on policymaking: the power-interest, problem-solving, and institutional perspectives. Each is fleshed out in detail in the following chapter. In brief, the power-interest school highlights the role of influential actors such as political parties or pressure groups in lobbying for policies that best complement their electoral or other interests. Problem-solving perspectives emphasize the role of groups of actors that cut across bureaucratic, policy expert, and interest group lines to try to resolve policy problems. Institutional theories focus on the role of political structures and path dependent policy legacies in shaping the policy process. Each perspective is compelling on theoretical grounds and has also been substantiated by empirical research in a variety of policy spheres.

While each of these schools of thought sheds light on the policy process, none can successfully account for the range of race policy outcomes in Britain and France. Even taken together these approaches cannot adequately answer two essential questions: What motivated actors to make the decision they made, and why did actors choose such different options in such similar contexts? These are questions that pose problems for the three perspectives not only in the cases presented here, but also in other spheres of policymaking. To explain the content of policies within a country and cross-national differences in policy outcomes, it is necessary to turn to the role of ideas.

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[26] For a collection of essays on the topic of ethnic mobilization in Europe, see Rex and Drury (1994). For a seminal text on the role between institutional configurations and ethnic identities and actions, see Nagel (1986).

The key finding of this study is that ideas in the form of *frames* best account for race policies in Britain and France. As I demonstrate through detailed historical case studies, British and French policymakers operated with sets of ideas that significantly influenced the trajectory of their domestic race policies. Moreover, the difference between these sets of ideas explains much of the policy divergence between the two countries. The contents and contours of these race frames will be specified in more detail in the next chapter. They can, however, be summarized as follows: British policymakers have largely accepted the categories of race and ethnicity; they have conceived of racism primarily in "color" terms and have devoted the majority of their energy to fighting access racism; and they have strongly identified their problems of racism with the North American context. By contrast, prevailing French frames have downplayed or denied the categories of race and ethnicity, they have focused more on expressive racism and on anti-Semitism, and they have rejected the North American analogy because of its perceived irrelevance to understanding France's domestic context of racism. French race frames have therefore propelled French policies down a substantially different path from that taken in Britain. In short, it has been the different political and public conceptions of race, racism, and antiracism that have had the most important impact on the precise nature of each country's concrete policies.

In making this argument, this book differentiates itself from studies that focus primarily on the role of political or pressure group interests (Freeman 1995, Money 1999) or national institutional structures (Hansen 2000, Ireland 1994, Soysal 1994) in driving actions in the realm of immigration and integration.[27] Although it prioritizes ideas as the central factor determining outcomes, this study stands in contrast to influential work that underlines the impact on migration or incorporation of international ideas such as liberal rights or norms of universal personhood (Hollifield 1992, Soysal 1994). Race policy decisionmaking processes in Britain and France in the decades after World War II have proven relatively insulated from supranational or transnational forces, perhaps surprisingly for those that have noticed their influence in a variety of domains. Like Favell (1998) and Freeman (1979), I argue that prevailing modes of thought in the two countries are particularly worthy of attention. But whereas

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[27] The authors identified with a school of thought are, of course, sensitive to a range of variables in their studies. Boiling down their sophisticated work in this way is therefore a simplification of their arguments. Nevertheless, doing so points out some of the major axes of difference prevalent in explanations of immigration and integration concerns.

Favell's principal goal is to describe each nation's "philosophy of integration" and understand its durability in the face of obvious pathologies, my goal is to analyze the causal relationship between race frames and race policies within each country. And unlike Freeman, who views ideas as falling within a problem-solving rubric and sees them as one among several equally important explanations of cross-national differences,[28] I seek to isolate frames as variables in their own right and to argue that they are the most significant factors accounting for British and French race policy outcomes and divergences.

Demonstrating the impact of frames requires a careful process-tracing of policy developments in each country. Arriving at a comprehensive history of when, how, and why policymaking took the course that it did has entailed examining numerous archives, conducting dozens of interviews, and weighing evidence from books and articles written by hundreds of scholars and race policy participants. Scrutinizing the facts in the light of theoretical perspectives available in the field of comparative public policymaking encourages a skeptical analysis that pays attention to a wide variety of potential influences on each country's policy trajectory. At its base, this study highlights the significance of frames in British and French race policymaking. Yet, it also seeks to reflect on the role of ideas more broadly. To this end, I develop a definition of frames that can be applied to numerous policy spheres; I map out a method for locating frames among actors in a polity; and I examine the questions of where frames originate and when and how they change. This book thus seeks to formulate a model of the interaction between ideas and policymaking that illuminates the influence of frames on the policy process in general.

To accomplish this, the theoretical framework for analyzing the cases is outlined in the following chapter. It sketches the power-interest, problem-solving, and institutional perspectives on policymaking, highlighting their strengths and weaknesses, and explores in depth the ideational perspective, defining frames, and developing tools for understanding their role in the policymaking process. The historical case studies comprise the second part of the study. Chapters 2, 3, and 4 retrace the passage of the British Race Relations Acts of 1965, 1968, and 1976, while Chapters 5 and 6 perform the same task for the French antiracism laws of 1972 and 1990. This segment of the project uncovers the origins and influence of frames on policymaking in each country and examines how frames interact with

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[28] See especially Chapter 9 in Freeman (1979), in which he favors the term social learning over problem-solving.

important variables (such as power, interest, and institutions) highlighted by other theoretical perspectives. In order to present the material in a systematic format, each historical chapter utilizes Kingdon's (1995) analytic distinction between two basic segments of the policymaking process: agenda setting and alternative specification.

The third part of the book summarizes the lessons learned from the analysis of the theories and the history. Chapter 7 assesses the role of frames, emphasizing both that they are identifiable and that they are necessary to explain race policy outcomes and cross-national policy differences. Furthermore, it addresses three issues at the heart of debates on the role of ideas in policy analysis. It explores how frames interact with variables associated with the power-interest, problem-solving, and institutional schools of thought in order to integrate ideas into more comprehensive models of comparative public policymaking. It reflects on the conditions under which frames are likely to be most influential in the policy process. Finally, it sketches an outline of the sources of British and French race frames and argues that as a general rule, examining the socialization of key actors is likely to prove the most fruitful first step in understanding the origin of policy frames. This study therefore demonstrates not only that frames matter, but also illuminates how they matter, when they matter most, and where they come from.

Chapter 8 concludes by returning to the overarching questions of race and integration central to the new multiethnic Europe. It touches on the developments in race policy that have taken place in the most recent years in Britain, France, and elsewhere in Europe – developments for which the policy dust has not quite settled. The chapter then reflects upon the costs, benefits, and trade-offs associated with different policies designed to promote harmonious ethnic relations.