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# Citizenship in Colonial Africa

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## An Overview of British and French Repertoires.

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*Mark Sizwebanzi Mngomezulu*

One of the leading characteristics of the British and French colonial experience in Africa in the 20th century—a period often referred to as late colonialism—was the systematic imposition of colonizing interests on the territory, and the institutionalized separation of master and colonial subject. This meant that the majority of native Africans, under the auspices of the British and French empires, did not enjoy the same rights to citizenship as European-born or African-born whites. This resulted in a form of bifurcated citizenship that confined the majority of the population to second-class citizenship. However, between the two empires, there are important differences of citizenship conceptualization that ultimately led to diverging local experiences between British and French Africa.

This paper aims to understand why the French and British empires applied the concept of citizenship differently in their African colonies. Scholars often argue that most Africans were denied citizenship in the French and British colonies for economic, political and social reasons. This reasoning is insufficient because the experiences within each empire are different. I argue instead, that historical experience led to distinct ways of understanding and deciding who was, or was not a citizen—producing a unique result in British and French African colonies. Chief among these historical experiences was the French revolution of 1789 that purported to equalize the rights of people before the law, and the lack of an experience of similar pretensions in Britain. This and other experiences had wider ramifications than could have been anticipated.

### Definition of Citizenship and Theoretical Framework

Barbalet argues that citizenship “defines those who are, and who are not, members of a common society.”<sup>1</sup> This infers that citizenship is an exclusive concept. Waters further argues, “It allows one to participate in a community while enjoying certain rights and obligations.”<sup>2</sup>

To be a citizen of a country entails an individual’s recognition by the relevant authorities, as such. The status extends certain protections over the person granted citizenship; be it social, political and economic protections. In exchange for that, the citizen must abide by the rules of the constituted authority—the state<sup>3</sup>. The sharp distinction of who belongs, also entails defining those who do not belong to a particular state and these “outsiders may be defined and identified informally through the use of tacit and internalized classification schemes” and also formally through specific documentation, as is the case in modern states<sup>4</sup>.

This understanding of citizenship has its genesis in Western Europe. It rose concomitantly, with the overarching theory of popular sovereignty in the 17<sup>th</sup> Century—challenging the unchecked rule of monarchs and emperors, and advocating for the

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<sup>1</sup> Jack Barbalet (1988) cited in Ndegwa, S. “Citizenship and Ethnicity. An Examination of Two Transition Movements in Kenyan Politics,” *American Political Science Review* 91.3 (1997), 599.

<sup>2</sup> Waters (1989), 160, as cited in Stephen Ndegwa, “Citizenship and Ethnicity. An Examination of Two Transition Movements in Kenyan Politics,” 599.

<sup>3</sup> Crawford Young, “Nation, Ethnicity, and Citizenship: Dilemmas of Democracy and Civil Order in Africa,” in *Making Nations, Creating Strangers: States and Citizenship in Africa*, ed. P. Nugent, et al. (Boston: Brill Academic Publishers, 2007).

<sup>4</sup> Roger Brubaker, *Citizenship and Nationhood in France and Germany* (Boston: Harvard University Press, 1992), 30.

inclusion of common people in decision-making. Burbank and Cooper assert that there was never a clean break between the rule of empires, and the ushering in of nation-states and popular sovereignty, with the latter's attendant principles of citizenship being extended to the vast majority of people. Nation-states and popular sovereignty were competing ideas in a world that was ruled by empires.<sup>5</sup>

These novel ideas brought to the fore certain questions. One of which, as Burbank and Cooper note, was: "Would citizenship be 'national'—focused on a people who represented themselves as a single linguistic, cultural, and territorial community—or would it be "imperial," embracing diverse peoples who constituted the population of a state?"<sup>6</sup> Such a question was important in colonial Africa, as the French and British empires tried to assert their authority over vast expanses of land on the continent.

History was to determine some of the answers to these questions. Writing on the salience of history in politics Marx, in the *Eighteenth Brumaire of Louis Bonaparte*, explains "Men make their own history, but they do not make it as they please; they do not make it under self-selected circumstances, but under circumstances existing already, given and transmitted from the past. The tradition of all dead generations weighs like a nightmare on the brains of the living." This highlights that every nation calls upon a collective memory to determine rules and norms.

The methods that colonial powers used in Africa to subdue populations were not new. They had been used previously, and in a sense part of the repertoire of each empire, as Burbank and Cooper note. But the idiosyncrasies of British and French methods can each be traced back to a complex yet

unique historical trajectory, from which they are selected. It is through this framework—a framework that privileges historical grounding—that the question of citizenship in the former colonies of France and Britain becomes clear.

## COLONIALISM IN AFRICA

Historians often describe European colonization of the African continent in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries as a "scramble for Africa". Ushered in by the Berlin Conference, a meeting in which representatives of western powers gathered in Berlin to determine the colonial future of Africa, this era of colonialism was marked by competition among the industrializing west for land and resources. To accomplish their goal, western colonizers employed a regime of domination over indigenous people.

Cooper<sup>7</sup> cautions against assuming colonialism in Africa as the natural step that Western Europe had to take toward Africa. He argues that there were competing ideas of how empires should extend their rule in colonies. Colonialism became a favored option because it had support from well-connected individuals in the metropolis. Powerful entities in the metropolis, such as private companies, saw virgin territory as a bastion of natural resources to be extracted and an abundance of cheap labor for production.

For Mamdani, colonialism in Africa was concerned about the "native question"; that is, "how can a tiny and foreign minority rule over an indigenous majority?"<sup>8</sup> Both empires looked into their repertoires for suitable strategies of domination. At the core of both became the de-humanization of the

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<sup>5</sup> Jane Burbank and Frederick Cooper, *Empires in World History: Power and the Politics of Difference* (New Jersey: Princeton University Press, 2010).

<sup>6</sup> *Ibid.*, 220.

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<sup>7</sup> Frederick Cooper, *Africa since 1940: The Past of the Present* (United Kingdom: Cambridge University Press, 2002).

<sup>8</sup> Mahmood Mamdani, *Citizen and Subject. Contemporary Africa and the Legacy of Late Colonialism* (New Jersey: Princeton University Press, 1996), 16.

African including the institutionalization of negative racial stereotypes.

Cooper states that:

Colonial empires differed from other forms of domination by their efforts to reproduce social and cultural difference. At some level, conquest implied incorporation: the loser had to be taught who the boss was and behave accordingly. But colonial conquest emphasized that the conquered remain distinct; he or she might try to learn and master the ways of the conqueror but would never quite get there<sup>9</sup>.

Here we see that order—as conceived by the colonial power—was an important principle in the colonies. And the distinction by skin color and ethnicity played a great role in both French and British colonialism.

Both empires saw the goal of citizenship as the preservation of the status quo balance of power that placed white European races on top of the social order. As the case study section will show, native Africans were later included, begrudgingly, as citizens—in a piecemeal strategy. The British, and to a greater extent the French, would eventually open the door for Western-educated Africans, but still a majority of uneducated Africans would remain excluded from legal citizenship status<sup>10</sup>.

Events beginning after World War I and through World War II changed the course of history. After the first war—having gallantly participated in the war on the side of the allied forces—many African soldiers returned to Africa believing they had earned the right to become citizens. They began to demand the social, economic and political benefits of citizens, the majority of whom, at the time, were white<sup>11</sup>. Paralleling this were

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<sup>9</sup> Cooper, *Africa since 1940: The Past of the Present*.

<sup>10</sup> Mamdani, *Citizen and Subject. Contemporary Africa and the Legacy of Late Colonialism*.

<sup>11</sup> Cooper, *Africa since 1940: The Past of the Present*.

the rising voices of educated Africans criticizing the colonial system and its institutionalization of citizenship based on skin-color. In their demand for equal rights, particularly in French Africa, native Africans in the colonies would pull from ideas initially planted in each empire's past, and seeking to avoid past mistakes, imperial powers pursued different appeasement techniques.

## **CITIZENSHIP IN FRANCOPHONE AFRICA: ASSIMILATION**

The French revolution of 1789 was a watershed in the French empire because the assembly passed the Declaration of the Rights of Man and Citizen. This declaration “stressed equality before the law and representative government.”<sup>12</sup>

However, it was unclear how far equality of men, and by extension citizenship, should extend to colonial holdings, and the criteria that would be used to determine who qualified and who was not. The arguments ranged from theories of how citizenship did not apply to Africans and Asians, while others took a more inclusive stance, arguing that colonization was an indefensible practice<sup>13</sup>.

Several years later, the revolution in the French colony, St. Domingue (now Haiti), complicated matters for the empire when black slave-owners toppled the French colonial structure and gained independence under the reasoning that “citizenship...should not be restricted by color.”<sup>14</sup> The events in St. Domingue resulted in “the 1795 constitution in France the colonies an ‘integral part’ of France. France became, for a time, an empire of citizens.”<sup>15</sup> Pandora's Box had been opened.

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<sup>12</sup> Burbank and Cooper, *Empires in World History: Power and the Politics of Difference*, 224.

<sup>13</sup> Burbank and Cooper, *Empires in World History: Power and the Politics of Difference*.

<sup>14</sup> *Ibid.*, 226.

<sup>15</sup> *Ibid.*, 227.

Such events in the history of France influenced its colonial policy in Africa in the early to mid-twentieth century, especially when Africans began to demand their rights as citizens in the empire. They invoked the Declaration of the Rights of Man and Citizen, arguing they should be recognized as citizens—their voices bolstered by other critics of colonial rule.

The French empire found itself in a conundrum because it desperately needed its colonies at this time to rejuvenate its economy that had been devastated by the wars, especially World War II. To maintain control, France appeased native African populations by offering them legal citizenship that was devoid of any rights that European French citizens enjoyed. As Young says, “the assimilative elements in French...colonial ideologies extended nominal citizenship to all, but not its full substance.”<sup>16</sup> The essence of the strategy was appeasement instead of recognition of Africans as citizens. However, this did not mean that Africans would not take such an advantage and use it to its fullest potential.

By the 1940s, there were already African deputies representing the colonies in the French legislature. Most notable among them, was Leopold Senghor of Senegal, who was instrumental in the abolishment of “forced labor and separate administrative justice.”<sup>17</sup> One idiosyncrasy of the French conception of citizenship is that the Africans agitated for inclusion as citizens in the French empire, as opposed to charting a path independent of the metropole. Political realities and perceived economic gains played a major role in such a course of action. The idea of African colonies as provinces of one

French empire, whose emphasis had increased over the years succeeding the Haitian Revolution, had influence on the thinking and strategizing of African natives in the colonies. Thus even though colonial rule was highly exploitative of natives, they still chose to be part of the empire. In addition, the colonies’ politics were intimately tied with that of France, as has been mentioned before that African deputies sat in the French legislature. This was unique because, as it will be observed in the British case, citizenship debates were territorially bound and rule was more indirect. Indeed, Cooper contends that it is historical experience that shaped the actions of the players at the time.<sup>18</sup>

Elkins argues, “France hoped to restore its international prestige and resist subordination to an emerging Anglo-American alliance through closer integration with its colonies.”<sup>19</sup> Its colonies presented the chance to counterbalance the ever-growing economic power of the British especially in world affairs. This further explains the nominal citizenship that France extended to residents of its African colonies: appeasement for the sake of buffering British power. Moves toward greater assimilation were reflected in the French constitution of 1946, which “proclaimed that inhabitants of all of these entities would now have ‘qualities’ of French citizens.”<sup>20</sup> As Elkins writes, “The assimilationist principles upon which it (the French empire) was originally established”<sup>21</sup> reaffirmed France as one with its colonies abroad. Yet, notwithstanding a constitution

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<sup>16</sup> Young, “Nation, Ethnicity, and Citizenship: Dilemmas of Democracy and Civil Order in Africa,” 254.

<sup>17</sup> Frederick Cooper, “Restructuring Empire in British and French Africa,” *Past and Present*, 10, Supplement 6 (2011), 200.

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<sup>18</sup> Cooper, *Africa since 1940: The Past of the Present*.

<sup>19</sup> Caroline Elkins, “Race, Citizenship, and Governance: Settler Tyranny and the End of Empire,” in *Settler Colonialism in the Twentieth Century: Projects, Practices, Legacies*, ed. C. Elkins, and S Pedersen (Kentucky: Routledge, 2012), 211.

<sup>20</sup> Cooper, “Restructuring Empire in British and French Africa,” 200.

<sup>21</sup> Elkins, “Race, Citizenship, and Governance: Settler Tyranny and the End of Empire,” 211.

extending citizenship to virtually all peoples of the French empire, there was ambiguity as to the full extent of the law and its practicality.”<sup>22</sup>

Again, we come to see how the French revolution and the early years after it led to a series of events that profoundly impacted France’s rule of its African colonies well into the mid-20<sup>th</sup> Century. Burbank and Cooper capture the effects by emphasizing that: “In 1946, an African political leader, elected to serve in the French legislature in Paris, Leopold Senghor, invoked the moment 150 years earlier when France recognized the citizenship of black slaves. He was trying to return to the promise of revolutionary France and make all subjects in the colonies into citizens, with the same rights as those of European France.”<sup>23</sup> Here, the values elucidated in the Declaration of the Rights of Man and Citizen were recalled and repurposed to advocate for the rights of French-Africans.

Of course, granting citizenship to black subjects en masse had social implications that threatened the stability of the empire at the time, which is why the colonial authorities were circumspect in their policies. This was seen in the extension of nominal citizenship to native Africans and especially those in the cities. Increasing the number of citizens implied the extension of welfare programs to an unsustainable number of people. There was also the problem of whether “citizens of European or African France could quickly set aside habits and expectations of privilege and authority, of discrimination and denigration, built up in decades of colonial rule.”<sup>24</sup> Citizenship entails an ‘us-them’ dichotomy, and extending it to groups that had been historically disadvantaged, threatens the privilege of those

who are citizens at the time. Most of the time, the latter resist such efforts.

## **SUBJECTS OF THE BRITISH MONARCH: INDIRECT RULE**

The foremost difference between the British Empire’s conception of citizenship as applied to their African colonies and that of the French, was that Britain never considered granting citizenship to native Africans within its colonies<sup>25</sup>. Instead there was a preference for indirect rule—the strategy of ruling through chiefs. The British did not invent this strategy—having been employed by other empires in the past.<sup>26</sup>

Mamdani argues that indirect rule was not a benevolent process of respecting the customs of African ethnic groups, or letting them develop in their own way either. The African was seen as a “tribesperson” subject to “customary law.” Such a process of separate administration for Africans effectively meant that they had separate rights from Europeans, and existed in a different society from that of the British.

One important reason for this fundamental difference in the techniques employed by the French colonial rule was that Britain never experienced a revolution that claimed to equalize the rights of people before the law. The only revolution that comes close is the Glorious Revolution of 1688, but this was mainly a tussle between Parliament and the monarchy concerning who was to wield more power. Hence, the British historical narrative did not have universal natures of freedom on which native Africans could base a case for demanding citizenship. This is not to argue that ideas of the Enlightenment period in the 20<sup>th</sup> Century—popular sovereignty, equality, amongst others—did not affect the British Empire, but that it

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<sup>22</sup> Cooper, “Restructuring Empire in British and French Africa,” 201.

<sup>23</sup> Burbank and Cooper, *Empires in World History: Power and the Politics of Difference*, 229.

<sup>24</sup> Cooper, “Restructuring Empire in British and French Africa,” 201.

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<sup>25</sup> Cooper, *Africa since 1940: The Past of the Present*.

<sup>26</sup> Burbank and Cooper, *Empires in World History: Power and the Politics of Difference*.

rationalized such arguments differently, and in turn translated into unique colonial strategies.

The notion of citizenship in British colonies is captured by Cooper, when he mentions that the, “ruling fiction was ‘self-government’: each territory would follow its own path; there would be no representation of Africans in the London parliament.”<sup>27</sup> The authorities channeled African political activity in territorially bounded institutions, thus avoiding any calls for citizenship equality of natives and white people, since territories were “independent.”

The fact that the British never considered Africans in the colonies to be citizens of Britain did not snuff out debates for equality and citizenship. Rather, it channeled them differently, especially after World War I through World War II. The British, unlike the French, never envisioned a possibility of Africans becoming citizens even nominally—let alone citizens with equal footing to the European settlers in the colonies, or those in the metropole. Mazrui disparages the British in these words: “I hope it is only a coincidence that the Anglo-Saxons...have been the worst offenders among the Westerners in institutionalized racism. The Anglo-Saxons were the architects of lynching and Jim Crow.”<sup>28</sup> The importance of racial thought in the mind of the colonial administrator was a great barrier.

The aforementioned can help us understand the different policies of both the French and the British. Assimilation, at the basic level, means acceptance—a capitulation to inclusiveness. On the other hand, indirect rule evokes aloofness, a preference for separation among peoples. And that is what the British did. British culture was seen as

almost naturally inaccessible to the native. Whereas in the French empire, an African could, with education and consumption of French culture, become a French citizen, the British had no such thing.

Like their French counterparts, the British also faced the real problem of trying to retain its empire because of its economic importance. As Cooper states: “attempts to get educated Africans to focus their ambitions on local government quickly failed. The focus was not London...but the center of each territory.” The result was that ambition for equality by most African leaders followed the avenue opened by the master: “political parties in colony after colony demanded full participation in each territory’s legislative and executive institutions,” without demanding to sit in London.<sup>29</sup>

After having served in the European wars—World War I and World War II—most returnee Africans of British colonies flocked to urban centers and began lives that depended to a larger extent on Western goods. Their bad experience in the cities, stemming from repressive colonial policies, fueled their demands for a better life<sup>30</sup>. Also, the newly-formed educated class saw the contradictions of the colonial state—that it oppressed Africans in their native land and extracted its resources—and sought to challenge that.

Instead of an incorporation of Africans as citizens in the empire, the British suggested a possibility of self-government in its separate colonies, in the future. To this end Cooper argues that, “the Nationalities Act of 1948 created something of an echo of what the French were doing—a second tier Commonwealth citizenship, derivative of the primary citizenship of the Dominions, but

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<sup>27</sup> Cooper, *Africa since 1940: The Past of the Present*, 49.

<sup>28</sup> Ali Mazrui, “Who are the Africans?” in *Who is an African? Identity, Citizenship and the Making of Africa-Nation*, ed. J. Adibe (London: Adonis & Abbey, 2009), 32.

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<sup>29</sup> Cooper, “Restructuring Empire in British and French Africa,” 202.

<sup>30</sup> Cooper, *Africa since 1940: The Past of the Present*.

applied to colonies as well.”<sup>31</sup> This only allowed British Africans to gain access to British Isles—a far cry from recognition among citizens. Africans could be considered as citizens in the British Isles but not in Britain itself—an obvious hostility towards native Africans in the metropolis.

In contrast to developments in the French empire around the same time, “in British Africa...the theme of equality surfaced, although without the same appeal to empire-wide citizenship and its norm of equivalence...in French Africa.”<sup>32</sup>

Such attempts by both colonial authorities to shape citizenship and the reaction of the subjects often degenerated into a violent process. This was more the case in settler colonies—colonies where Europeans were encouraged to settle in great numbers—where African populations were condemned into reserves. For example, the Mau Mau rebellion in Kenya in the around 1957 to 1960 was a reaction to the increasing brutality of white colonial settlers, as the Kikuyu people called for better treatment and rights<sup>33</sup>.

Cooper opines that “repression may have well reflected the self-perceived openness to political reform: that some Africans rejected the political inclusion and economic development that was being offered them now struck officials as an affront, not the backward inclinations inherent in the nature of the African.”<sup>34</sup> Because of the power to set agenda for reform, the colonists perceived a rejection of that agenda as ungratefulness on the part of those over whom they ruled. Therefore persistence on an agenda unsanctioned by the colonial masters led to the repression of native Africans,

especially in the period preceding independence.

## CONCLUSION

In the late 19<sup>th</sup> and early 20<sup>th</sup> Century, Britain and France were among the Western European nations that decided, without any input from representatives of the continent itself, to divide Africa into colonies in support of self-interested goals of industrialization and power. While France and Britain share a common Western European identity, the historical narratives that came into effect when each nation devised and employed its colonial strategy in Africa were quite different. And while scholars often combine the colonial experiences of British and French African colonies in their analysis, this is insufficient as there are major differences between them.

This paper has shown how historical experience impacted the unfolding of events relating to calls for equality in the colonies by Africans, and relating to citizenship in particular. In part, this proves the interconnectedness of historical experience. Also, the empires used tools which they saw fit for that particular time, although they could not control how events would unfold, once they had chosen their policies. The policy of assimilation pursued by the French had a lasting effect on citizenship conception in its African colonies, so much so that native Africans saw their rights as intrinsically connected with France itself. A shift towards more territorially bounded units in French Africa arises in the late 1950s, influenced to a certain extent by the reconfiguration of the Third World, which was breaking away politically from Western powers and forming new states. On the other hand, the policy of indirect rule pursued by the British channeled citizenship rights to more territorially bounded units, and it could be said that this was the model that inspired the form of statehood that now prevails in Africa.

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<sup>31</sup> Cooper, “Restructuring Empire in British and French Africa,” 202.

<sup>32</sup> *Ibid.*, 205.

<sup>33</sup> Elkins, “Race, Citizenship, and Governance: Settler Tyranny and the End of Empire.”

<sup>34</sup> Cooper, “Restructuring Empire in British and French Africa,” 203.

Lastly, this paper has drawn fairly broad strokes of citizenship in colonial Africa—a heuristic contribution at best. Thus it suffices to add that there are numerous potential avenues for further research in this topic. For one, this essay has hardly made mention of the variation—if any—of citizenship understanding within countries of colonized by the same power, and implication on state formation processes. Also, it has not examined the dynamics between the colonizer and the colonized in shaping citizenship, and the subsequent states. These omissions are largely a product of the essay’s scope. Thus it behooves other scholars of Africa to delve into the particularities in order to understand deeper the impact of past understandings of citizenship on the present.