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INDIRECT RULE—FRENCH AND BRITISH STYLE

MICHAEL CROWDER

IN his witty and thought-provoking Lugard Memorial Lecture, 'Et maintenant, Lord Lugard?' (*Africa*, xxxiii. 4, 1963), Gouverneur Deschamps has provided us with an excellent general appraisal of the relative achievements and failures of French and British 'native' administration in Africa. But he does not do full justice to the fundamental differences between the two systems. Though he hints at these differences on several occasions in his lecture, he contends that, far from what is generally supposed, the two were in practice very similar, since they both reposed on indigenous chiefs.¹ He insists that 'la seule différence est que nous n'avons pas tenté, comme vous, Lord Lugard, de moderniser ces états anciens, ni de créer des embryons d'états là où il n'en existait point'; or '... [our administrative practice] ne différait de la vôtre (au moins en Afrique noire) que par une allure plus familière et des buts moins définis'. This seems seriously to underestimate the nature of the differences between the two systems, which were rather those of kind than of degree.² M. Deschamps rightly insists that there has been a tendency on both sides of the Channel to over-simplify the basic characteristics of systems of colonial administration in Africa. Nevertheless there were such fundamental differences between the French and British systems that, even if both did make use of 'chiefs', it is not possible to place the French system of native administration in the same category as British Indirect Rule. It is true that both powers had little alternative to the use of existing political authorities as a means of governing their vast African empires, and in most cases these authorities were headed by chiefs. What *is* important is the very different way in which these authorities were used. The nature of the position and power of the chief in the two systems was totally different and, as a corollary, so were the relations between the chief and the political officer, who was inspired in each case by very different ideals.

The British in Northern Nigeria, which became the model for indirect rule,

¹ In the summary of the lecture in English it is put more explicitly: 'Indirect rule has been practised by local governors at least since the second empire; from the end of the nineteenth century the

official policy was that of "Association"—very close to Lugard's ideas.'

² See L. P. Mair, *Native Policies in Africa*, London, 1936.

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believed that it was their task to conserve what was good in indigenous institutions and assist them to develop on their own lines. The relation between the British political officer and the chief was in general that of an adviser who only in extreme circumstances interfered with the chief and the native authority under him. However, where chiefs governed small political units, and in particular where their traditional executive authority was questionable, the political officer found himself interfering in native authority affairs more frequently than ideally he should. This was true in many parts of East Africa and in parts of Yorubaland, where the borderline between 'advisory' and 'supervisory' in the activities of the political officer was not always clear. Though indirect rule reposed primarily on a chief as executive, its aim was not to preserve the institution of chieftaincy as such, but to encourage local self-government through indigenous political institutions, whether these were headed by a single executive authority, or by a council of elders.¹ In Northern Nigeria a policy of minimal interference with the chiefs and their traditional forms of government was pursued. But Lugard himself had insisted on a reform of the indigenous taxation system and of the administration of native justice when he was Governor of Northern Nigeria and believed that, while the colonial government should repose on the chiefs, their administration should be progressively modernized. And, though his successors left them largely to themselves, Sir Donald Cameron, Governor of Nigeria from 1931 to 1935, who had introduced indirect rule to Tanganyika and held similar beliefs to those of Lugard, was shocked by the situation in Northern Nigeria, where he felt the emirates were fast developing into Indian-style native states.

Indeed, in the earliest inter-war period many emirs and chiefs ruled as 'sole native authorities', a position which gave them for practical purposes more power than they had in pre-colonial days, where they were either subject to control by a council or liable to deposition if they became too unpopular.² They were permitted to administer traditional justice, which, in the case of certain emirs, included trying cases of murder for which the death sentence, subject to confirmation by the Governor, could be passed. They administered political units that corresponded to those they would have administered before the arrival of the colonial power. They were elected to office by traditional methods of selection, and only in the case of the election of a patently unsuitable candidate to office, would the colonial power refuse recognition. There was thus a minimal undermining of the traditional sources of authority. The main change for the Fulani Emirs of Northern Nigeria, for instance, was that they now owed allegiance to the British Government rather than to the Sultan of Sokoto, and collected taxes on its behalf, though they retained, in most cases, 70 per cent. of the amount collected for the administration of their native authority.

¹ See Sir Philip Mitchell's article on 'Indirect Rule', when Governor of Uganda, in the *Uganda Journal*, iv, no. 1, July 1936, where he says that indirect rule is founded on the assumption that 'every group of people must possess some form of . . . natural authority, normally, of course symbolized in the person of some individual or individuals'. 'The administrative system called "Indirect Rule" endeavours in each place where it is to be applied to ascertain what are the persons or institutions which

the people concerned look upon as the natural authority.'

² See P. C. Lloyd's article 'Kings, Chief and Local Government', *West Africa*, Saturday, 31 January 1953, where he remarks that the Yoruba kings became much more powerful under the British. 'They could only be deposed by the British administration which often tended to protect them against their own people.'

This system of indirect rule was, with modifications, practised wherever possible in Britain's colonies in West Africa and in most of her other African territories. There were notable exceptions, especially in Eastern Nigeria, where the absence of identifiable executive authority in most communities made indirect rule as practised in Northern Nigeria almost impossible to apply. In such societies, British assiduity in trying to discover chiefs, or invent them, might lend colour to M. Deschamps's argument; but, in practice, the goal of ruling through traditional political units on whom local self-government could be devolved was maintained, and after much trial and error a system of democratically elected councils was formulated as most closely corresponding to the traditional methods of delegating authority.

If, taking into account such variations, we use indirect rule in Northern Nigeria as a model we shall see just how greatly the French system of administration in Black Africa differed from that of the British.

The British system depended on the advisory relationship between the political officer and the native authority, usually a chief, heading a local government unit that corresponded to a pre-colonial political unit. The French system placed the chief in an entirely subordinate role to the political officer. M. Deschamps alludes only briefly to the role of the French political officer towards the end of his article, where he hints at the nature of his status as a *roi paternel* or *roi absolu*. But it is important to stress that the chief in relation to the French political officer was a mere agent of the central colonial government with clearly defined duties and powers. He did not head a local government unit, nor did the area which he administered on behalf of the government necessarily correspond to a pre-colonial political unit. In the interests of conformity the French divided the country up administratively into *cantons* which frequently cut across pre-colonial political boundaries. Chiefs did not remain chiefs of their old political units but of the new cantons, though sometimes the two coincided. In certain cases the French deliberately broke up the old political units, as in the case of the Futa Jallon where their policy was 'the progressive suppression of the chiefs and the parcelling out of their authority'.¹ Most important of all, chiefs were not necessarily those who would have been selected according to customary procedures; more often than not they were those who had shown loyalty to the French or had obtained some education. While the British were scrupulous in their respect for traditional methods of selection of chiefs, the French, conceiving of them as agents of the administration, were more concerned with their potential efficiency than their legitimacy. We need not wonder then that as a young French administrator, after serving in Senegal and Dahomey, M. Robert Delavignette should have been astonished, on his way to duty in Niger, to find that the British political officer in Kano actually called on the Emir when he had business with him and paid him the compliment of learning Hausa so that he could speak to him direct. 'Pour le jeune administrateur français, une telle manière d'administrer avait la charme d'un conte des *Mille et Une Nuits*.'² Contrast the position of the Emir of Kano with that of the Alaketu of Ketu in Dahomey. By tradition he was one of the seven most important rulers in Yorubaland, on an equal footing with the Oni of Ife and the Alafin of Oyo. A friend who

¹ Overall report on the general situation of French Guinea in 1906, Conakry, 1906, cited by J. Suret Canale in 'Guinea under the Colonial system',

Présence Africaine, no. 29 (English ed.).

² R. Delavignette in 'Lord Lugard et la politique africaine', *Africa*, xxi, no. 3, 1951.

visited him while Dahomey was still under French rule found him waiting outside the French Chef de Subdivision's office. He mentioned the fact that the King was waiting to the French administrator, who replied, 'Qu'est ce qu'il va se faire en-gueuler?', and kept him waiting a little longer.

It is clear then that the French explicitly changed the very nature of the powers of the chief and that 'his functions were reduced to that of a mouthpiece for orders emanating from outside'.¹ This is brought out clearly, for example, in the *Arrêté of 28th December 1936 on the organisation and regulation of the local indigenous administration in French Equatorial Africa* in the section dealing with *Chefs de Canton* (or *de Terre* or *de Tribu*).²

The *Chefs de Canton* (&c.) are recruited:

- (i) for preference from among the descendants of old families traditionally or customarily destined to command,
- (ii) from among notable natives, literate if possible, who have rendered services to the French cause and who are fitted to fill these functions by their authority or influence in the country,
- (iii) from among the *Chefs de Canton* (&c.) who have satisfactorily carried out their functions for at least four years,
- (iv) from among old soldiers who have completed more than the normal terms of service and who qualify for special treatment,
- (v) from among local civil servants (clerks, interpreters, &c.) who have worked satisfactorily for at least four years in the public service.

The following are the disciplinary measures applicable to *Chefs de Canton* (&c.):

- (i) Reprimand by the *Chef de Département*.
- (ii) Temporary withholding of salary.
- (iii) Temporary interdiction.
- (iv) Reduction of salary.
- (v) Dismissal.

Since the chiefs did not, except in rare cases, represent traditional authority and, since they were the agents of the colonial power for carrying out its more unpopular measures, such as collecting taxes and recruiting for labour, they were resented in most parts of French West Africa. While they retained no traditional judicial authority such as that of their counterparts in British West Africa in their Native Courts, they were agents of the law, in this case the unpopular system of summary administrative justice known as the *indigénat*.³ In many areas in the post-war period they became identified with pro-French administrative parties, particularly in Soudan (Mali).

¹ L. P. Mair, *op. cit.*, p. 210. R. L. Buell in his *The Native Problem in Africa* cites Joost Van Vollenhoven, Governor-General of French West Africa, 1912-17, as describing the chiefs as having 'no power of their own of any kind. There are not two authorities in the *cercle*, the French authority and the native authority; there is only one.'

² Translated by T. G. Brierly.

³ Concessions were made to customary law prior to 1946, when native penal law was abolished and all inhabitants of French Tropical Africa became

subject to the French code. Before that time only those Africans who were French citizens could claim justice under the Code. The vast majority of *subjects* were subject to the *indigénat* already referred to and to customary law. Customary law, however, was not administered by the chief but by the French administrator, who was assisted by two notables of the area who were versed in tradition. These courts could try both penal and civil cases. Now customary law survives in questions of inheritance, marriage, and land.

Hence it was not surprising that when, in 1957, just before the independence of Guinea, Sekou Touré (then Vice-Président du Conseil) decided to do away with chiefs, the operation was effected with remarkably little protest from either the indigenous population or from the French administration that had made use of them. Of the twenty-two Commandants de Cercle, still mostly French, called to Conakry to discuss the proposed removal of the chiefs (from 25 to 27 July) only four felt that the *chefs de canton* had a useful role to fulfil in the territory, and nearly all confirmed that the chiefs no longer possessed political traditional authority and had become mere agents of the administration. As far as the Commandant de Cercle for Labé was concerned: 'Pour moi, qu'ils soient là ou pas, c'est la même chose.'¹ This is a far cry from Nigeria of the day, where in the North the opposition party (N.E.P.U.) were trying unsuccessfully to rouse the people against the chiefs and where the Government of Eastern Nigeria, an area in which traditionally most societies did not have chiefs, commissioned a former expatriate administrative officer to 'investigate the position, status and influence of Chiefs and Natural Rulers in the Eastern Region, and make recommendations as to the necessity or otherwise of legislation regulating their appointment, recognition and deposition'.² In African countries where the British had imposed chiefs, as in Eastern Nigeria and parts of Uganda, their prestige had in fact gone up, but this has certainly not been true in the former French territories.

In formulating these general models it is once again essential to recognize exceptions to the general rule. For example, the kings of the Mossi in Upper Volta, the Fulani Emirs of the northern provinces of Cameroun, and a number of chiefs in Niger retained some power. But in general the French system of administration deliberately sapped the traditional powers of the chiefs in the interest of uniformity of administrative system, not only within individual territories but throughout the two great federations of West and Equatorial Africa. Thus it seems somewhat of an understatement to describe the French attitude, as Gouverneur Deschamps does, as 'notre pratique nonchalante à l'égard des chefferies'. Robert Delavignette in *Freedom and Authority in West Africa* (London, 1950) bears this out in his chapter on the Commandant. 'The man who really personified the *Cercle* was the Commandant. . . . He was the Chief of a clearly defined country called Damaragam (Zinder in Niger), and chief in everything that concerned that country.' Yet this was the Damaragam once ruled over by the powerful Sultans of Zinder, who are now reduced to little more than exotic showpieces of traditional Africa. So too does Geoffrey Gorer in *Africa Dances* (London, 1935), when he writes of the 'chefs de canton': 'In theory these local chiefs rule under the guidance of the local administrator: in practice they are the scapegoats who are made responsible for the collection of money and men. While they enjoy the administrator's favour they have certain privileges, usually good houses and land and in a few cases subsidies; but unless they are completely subservient they risk dismissal, prison and exile.' Gorer draws attention to a phenomenon that bears out just how much the French had changed the nature of chiefs in West Africa. In Ivory Coast, if a 'chef de canton' with no traditional rights to 'rule' were imposed

¹ *Conférence des Commandants de Cercle*, Imprimerie du Gouvernement, Conakry, 1957.

² G. I. Jones, *Report on the Position, Status and In-*

fluence of Chiefs and Natural Rulers in the Eastern Region of Nigeria. Government Printer, Enugu (1957/8).

by the administration, the people often elected in secret a 'real' chief. Delavignette also notes this in *Freedom and Authority in French West Africa*.¹

Why this great difference in approach by the two powers to the question of native administration, given that both for reasons of economy had to administer their vast African possessions with the aid of 'chiefs'? The difference has much to do with difference in national character and political traditions. While few would disagree that the British were inspired by the concept of separate development for their African territories, there is still much debate as to how far the French were inspired by the concept of assimilation even after its formal abandonment as official policy in favour of a *politique d'association*. Only by an examination of the extent of the survival of assimilationist goals in French colonial policy can we understand the reasons for the difference in the two approaches to native administration. This survival showed itself at two levels: as a dominant feature of the *politique d'association* and in the personal ethos of the French political officer.

One of the problems here is to define assimilation. M. D. Lewis has drawn attention to the many definitions of assimilation in use:² (1) Assimilation as the dominant colonial policy of France, i.e. its dominant and continuing characteristics; (2) Assimilation as the policy abandoned in favour of association; (3) Assimilation as opposed to autonomy, i.e. integration versus devolution; (4) Assimilation as a legalistic definition, i.e. representation in the mother of parliaments; (5) Assimilation as civilization; (6) Assimilation as representing racial equality as against British tendency to the colour bar; (7) Assimilation as a highly centralized form of direct rule of colonies. It is of course difficult to choose any one definition as the satisfactory one. Assimilation as practised in the four communes of Senegal, the only instance of its full-scale application in French Tropical Africa, had the following distinctive features: political assimilation to the metropolitan country through the representation of Senegal in the Chambre des Députés; administrative assimilation by creating a Conseil-Général for Senegal modelled on the Conseils du Département of France, and by the establishment of municipal councils on the French model; the personal assimilation of Senegalese in the communes by according them the status of French citizens, though they were allowed to retain their *statut personnel*; the extension of French educational facilities as part of the French *mission civilisatrice*. This policy was abandoned not so much because men like Lyautey and Jules Harmand advocated Lugardian ideas about the relationship between the colonial power and African peoples, but

¹ A somewhat extreme point of view with regard to the French attitude to chiefs, which is the exact opposite of that of M. Deschamps, is held by J. Suret-Canale in 'Guinea under the Colonial System', *Présence Africaine*, no. 29, p. 53 (English edition): 'Between 1890 and 1914 the system of "direct administration" was progressively established. The former sovereigns (including those who had rendered the best service to French penetration) were utterly eliminated and the former political leaders utterly overthrown; ethnic limits, the traditional limits of the former "diwe" in the Futa Jallon, all those were carved up and rearranged at the whim of administrative needs or fancies. The political reality was henceforward the Circle, and where appropriate,

the Subdivision, commanded by a European administrator, and below them, the canton and the village commanded by African chiefs described as "traditional" or "customary". In reality, these chiefs in their role and in the powers devolved upon them had absolutely nothing traditional or customary; designed to ensure the cheapest execution (under their own responsibility) of the multiple tasks of administration, taxation, forced labour, recruitment etc., they were the exact counterpart of the caids of Algeria, subordinate administrators.'

² M. D. Lewis, 'The Assimilation Theory in French Colonial Policy', *Comparative Studies in Society and History*, iv, no. 2, January 1962.

because, to use Lewis's phrase, the French were 'not prepared to undertake the massive work of social transformation which alone could make it a reality'. But the *politique d'association* that succeeded it was certainly not that advocated by Jules Harmand, whereby the colonial power would respect the manners, customs, and religion of the natives and follow a policy of mutual assistance rather than exploitation. Rather it was one in which, while recognition was given to the impracticability of applying a full-scale policy of assimilation to African societies, a number of assimilationist characteristics were retained. First, the goal of creating French citizens out of Africans was not abandoned; it was just made more distant and much more difficult of achievement. Second, there was a high degree of administrative centralization on the mother country, which was not compatible with a true *politique d'association*. We have already seen that the French made little concession to indigenous political units in dividing up their African territories for administrative purposes. Third, the French civilizing mission was not abandoned, and though education might be sparse, it was modelled on the French system. Children spoke French from the day they entered school. No concession was made to teaching in the vernacular as in the British territories. Fourth, individual territories were not considered as having special characters, so that the same administrative organization was imposed on them all. Political officers would be posted from one territory to the other sometimes every other year, which gave them little time to learn the local language or ethnography. On the other hand the British political officer remained in the same territory for a long period of time, and in the case of Nigeria, in the same region; and promotion depended in part on the ability of the political officers to learn indigenous languages. Thus under the French system the one constant for the political officer could only be French culture, while for the British officer every encouragement was given to him to understand the local culture. As a corollary the French did give some encouragement to the formation of a native *élite*, which was absorbed into the territorial and federal administrative services, albeit not on a very large scale. The British, on the other hand, in the twenties and thirties actively discouraged the formation of a class of Europeanized Africans, particularly at the level of the central colonial administration. Miss Perham in the late thirties was advocating that no African should be appointed to the administrative service, which she regarded as an alien superstructure.¹ Rather they should be encouraged to work with the native administration. Nigeria was, in the words of Sir Hugh Clifford, Governor from 1919 to 1925, a 'collection of self-contained and mutually independent Native States' which the educated Nigerian had no more business co-ordinating than the British administration. Thus Nigerians were by and large excluded from the senior service of government, while a number of French colonials reached high posts in the administration. Professor Lucy Mair writing in 1936² about the status of the educated African in the French colonies remarked that: 'The assumption which governs the whole attitude of France towards native development is that French civilisation is necessarily the best and need only be presented to the intelligent African for him to adopt it. Once he has done so, no avenue is to be closed to him. If he proves himself capable of assimilating French education, he may enter any profession, may rise to the dignity of Under-Secretary for the Colonies, and will be received as an equal by

¹ P. C. Lloyd, 'Lugard and Indirect Rule', *Ibadan*, no. 10, 1960.

² L. P. Mair, *op. cit.*, p. 189.

French society. This attitude towards the educated native arouses the bitter envy of his counterpart in neighbouring British colonies.' Jean Daniel Meyer in *Desert Doctor* (London, 1960) writes of his experiences in French Soudan in the Army Colonial Medical Service before the Second World War: 'My colleague was a full-blooded Senegalese. He had studied medicine in France, attending the Bordeaux Naval School, and had the rank of lieutenant.' Fifth, the African colonies were considered economic extensions of the metropolitan country, and as Albert Sarraut insisted in his *La Mise en valeur de nos colonies* (Paris, 1923)¹ the colonies should provide assistance to France in the form of raw materials for her industry, and, in addition to this, troops in time of war, in return for which the African would benefit from French civilization. Colonial policy in the inter-war period was to be 'a doctrine of colonisation starting from a conception of power or profit for the metropolis, but instinctively impregnated with altruism'.

Finally it was at the level of the political officer himself that the tendency to assimilation so often manifested itself. Whatever official colonial policy may have been concerning the status of chiefs and the necessity to respect indigenous institutions, it is clear that the majority of French political officers believed sincerely in the French civilizing mission and that it was their role to bring 'enlightenment' to the African. They certainly did not believe that indigenous culture or institutions had anything of value to offer except as a stop-gap. L. Gray Cowan writing in 1958 observed: 'The young *chef de subdivision* in bush is still a proponent of assimilation through the very fact of his education as a Frenchman although it is no longer a part of official policy.'² The administrator from republican France, particularly in the inter-war period, had little time for the notion of chiefs holding power other than that derived from the administration itself. This provides a marked contrast with the average British administrator, who believed sincerely that for Africans their own traditional methods of government were the most suitable, provided they were shorn of certain features that did not correspond to his sense of justice. Coming from a country which still maintained a monarchy that had done little to democratize itself on the lines of the Scandinavian monarchies, he had a basic respect for the institution of kingship and the panoply of ritual that surrounded it. The British officer respected his chief as separate but equal, though certainly not somebody with whom he could establish personal social relations. It was the educated African before whom he felt uneasy. Indeed many political officers openly expressed their contempt for the 'savvy boy' or 'trouser African'. In Nigeria, even as late as 1954, one could hear such epithets used by Northern political officers about Southern politicians. The African's place was in the Emir's court, not at Lincoln's Inn or Oxford.

The French political officer, on the other hand, was able to establish relationships with the educated African. M. Delavignette has published in *L'Afrique noire et son destin* (1962) a revealing letter which he received from Ouezzin-Coulibaly, late Prime Minister of Upper Volta, in 1939, concerning his application for French citizenship. Ouezzin-Coulibaly, then a young teacher in Upper Volta, had been friendly with Delavignette at that time for some ten years and expresses his devotion to France and her cause in the war in the warmest terms: 'J'ai été à Sindou et c'est là que la nouvelle

¹ Quoted by L. P. Mair, *op. cit.*, pp. 186-9.

² L. Gray Cowan, *Local Government in West Africa*, New York, 1958.

de la mobilisation m'est parvenue le 29 Août 1939. J'ai pu admirer dans ce coin de brousse l'affection que les indigènes portent à la France. Le mouvement s'est opéré en silence et avec une rapidité qui suppose une certaine compréhension de devoir. J'en ai été émerveillé et cela c'est votre œuvre, c'est l'œuvre de tous ceux qui ont passé par là et qui ont inculqué au paysan indigène, qu'on fruste à tort, l'idée de la France et de la Patrie.' It would be difficult to find such an intimate relationship between a British political officer and a Nigerian teacher at that period. Even as late as 1954, such contact would have been rare. It would be interesting to make a comparison of the philosophy of the colonial service training courses of France, which were much longer established, with that of the British Devonshire courses.

In conclusion, the differences between the French and British systems of administration in Africa were not only differences in degree but in kind. Both may have used chiefs, but the position of the chief in each system was radically different. The basis for these differences may be sought in the fact that though assimilation as an official policy was abandoned after the early experiment in Senegal, it continued to be a most important inspiration both for the *politique d'association* and for the political officer charged with carrying it out. An understanding of the nature of these differences is not only essential to an understanding of colonial history in Africa, but also to an appreciation of the differences between the two main language blocks in independent Africa today.

Résumé

STYLES FRANÇAIS ET BRITANNIQUES D'ADMINISTRATION INDIRECTE

LE Gouverneur Deschamps, dans sa conférence à la mémoire de Lord Lugard 'Et maintenant, Lord Lugard?' ne fait pas suffisamment ressortir les différences fondamentales entre les systèmes d'administration indigène français et britanniques. Ces deux pays durent utiliser, pour gouverner leurs territoires, l'autorité politique existante, mais la situation et le pouvoir du chef dans les deux systèmes, et ses rapports avec le représentant politique étaient totalement différents. Le système britannique était basé sur les rapports consultatifs entre le représentant politique et l'autorité indigène — habituellement un chef — tandis que le système français plaçait le chef dans un rôle entièrement secondaire, semblable à un simple agent du gouvernement colonial central. Les Britanniques utilisaient les méthodes traditionnelles dans le choix de leurs chefs, mais les Français choisissaient plus souvent ceux qui avaient été loyaux, ou avaient reçu une certaine éducation. En conséquence, les chefs étaient souvent mal vus dans certaines parties de l'Afrique Occidentale Française, tandis que leur prestige augmentait généralement dans les territoires britanniques. Les Britanniques s'inspiraient de l'idée de développement autonome pour leurs territoires africains, mais les Français de celle d'assimilation, qu'ils abandonnèrent plus tard en faveur d'une politique d'association. Le représentant politique français fut alors à même d'établir des rapports plus faciles avec l'Africain évolué que ne le fut le représentant britannique. Il est essentiel de comprendre la nature de ces différences entre les systèmes français et britanniques, non seulement afin d'être au courant de l'histoire coloniale en Afrique, mais aussi en vue d'apprécier les différences qui existent aujourd'hui entre les deux blocs linguistiques principaux de l'Afrique indépendante.