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Welfare Regimes and Welfare Regions in Britain and Europe, c.1750s to 1860s

The literature on the historical roots of twentieth-century national welfare systems has burgeoned markedly. It is now clear that a broad extension of the scope and scale of European welfare from the 1860s onwards was accompanied by a convergence of welfare policies and informed by the extensive exchange of policy, information and people in an «emulative spirit». For all European countries, this process was inscribed in a vigorous debate over the dual issues of the desirability of the extension of the remit of the state and the relative balance of individual contributions (through insurance systems) versus taxpayer support for welfare measures. Developments within countries were often halting and rarely linear, and most surveys highlight multiple administrative, organisational and financial paths to similar policy outcomes. Nonetheless, where older surveys concentrated on differences in welfare state formation, more recent studies have focused on the similarities of process, ideology and outcome.


2 See J. Davis, «Health care and poor relief in southern Europe in the 18th and 19th centuries», in Health Care and Poor Relief in 18th and 19th Century Southern Europe, ed. O. Grell, A. Cunningham and B. Roeck (Aldershot, 2005), 10.

3 The Dutch were arguably leaders in social policy, particularly towards the sick poor, in the sixteenth and seventeenth centuries, but laggards by the twentieth century. See J. Israel, «Dutch influence on urban planning, health care and poor relief: The North Sea and Baltic regions of Europe, 1567–1720», in Health Care and Poor Relief in Protestant Europe 1500–1700, ed. O. Grell and A. Cunningham (London, 1997), 66–83; C. Nottingham and P. de Rooy, «The peculiarities of the Dutch: Social Security in the Netherlands», in King/Stewart, Welfare Peripheries, 39–66.

For the purposes of this article, four further features of the broad literature on the origins of modern welfare states are also important. Firstly, while historians have produced a range of excellent «national» surveys, systematic empirical comparisons between European states have been relatively rare. Perhaps one reason for this relates to a second feature of the literature: most studies have suggested that national welfare legislation, at least in its early stages, tended to build upon and codify (often after a substantial lag) existing practice rather than branch in entirely new directions. That is, prior to the closing decades of the nineteenth century it was municipalities, communes or other regional centres that drove or blocked welfare reform and innovation. Writing about welfare structures, either in their own terms or within the framework of understanding how twentieth-century welfare states evolved, thus necessarily involves writing about individual places, with all of the problems that this generates for issues of comparative research. A third, and related, feature of the literature has thus been an inevitable concentration on intraregional and micro-level variation, embodied in the concept of the «welfare republic» – the idea, in other words, that the character of local welfare arrangements was tailored in financial and ideological terms (even within the broad context of «national» laws or royal decrees) to local conditions. Thus, instead of seeing welfare «systems» on the European stage, before the late nineteenth century we see thousands of smaller welfare republics operating with only limited reference to other communities, and often with radically different policies, structures and expectations. To put this into perspective, Peter Hennock reminds us that there were some 47,000 (commune-centred) relief authorities in Prussia by the 1880s. Even in England and Wales, with their supposed overarching national


7 Hennock, The Origins, 27.
Against this backdrop, it is perhaps unsurprising that there is a continuing lack of inter-country comparative work and that a core narrative of both surveys and local studies on the European stage is an attempt by governments to systematise, centralise (control or oversight, if not funding) and bureaucratise welfare structures, processes and coverage. An equally strong narrative – whether we look at Belgium, Austria, France or the countries of southern Europe – is the patchy and fragile success of such endeavours. These observations do not mean that attempts to think more widely about the organisational, administrative, financial or mental/sentimental regularities of European welfare structures have been completely stymied, as will be demonstrated below. Indeed, a fourth feature of the general literature is that the English and Welsh Old Poor Laws stand out as qualitatively different to the welfare structures and underpinning mentalities found in other European states. Nonetheless, a focus on intraregional and micro-level variation has retarded the development of a broad theoretical framework to focus and contextualise comparative empirical work on the European stage.

Clearly, this is a partial rendering of a rich and diverse secondary literature. It serves to emphasise, however, that the process of understanding pre-1860 European welfare systems is also intimately tied up with multiple questions of spatiality. Such questions include: Should we accept the idea that national welfare systems represent the more or less spatially haphazard accumulation of the welfare practices and sentiments of innumerable welfare republics, themselves shaped by issues of finance, extent of demand, interpretation of the law, the scale of alternative resources in the economy of makeshifts, definitions of eligibility and above all local sentiment? Should welfare be regarded, in this context, as a dependent variable responding to exogenous stimuli, or was it an independent variable rooted in custom and precedent? Alternatively, was there more coherence to practice and...
sentiment? Is it possible, in other words, to suggest that the volume, scale, range and longevity of intraregional or inter-community variation in welfare practice and sentiment is sufficiently constrained to allow historians to discern the presence, even if unstable, of broadly based and physically locatable welfare regimes? What yardsticks might be used to compare welfare practices and to identify welfare sentiment? If one can talk in terms of typologies of welfare practice and sentiment – welfare regimes – then do these provide an effective framework for historians to systematically compare welfare provision between European states and, more ambitiously, to identify groupings of states that might be considered together as a «macro» welfare region? Or, does an understanding of European welfare systems and the development of a framework for comparative empirical research rest upon the identification and assembly of perspectives on similar welfare regimes at a sub-national level, juxtaposing not France, England or the Netherlands, but different parts of these European states?

These questions are too big to answer in a single article, but their essence lies at the heart of this piece, itself an initial attempt to establish a (spatial and analytical) framework within which broad comparative empirical work on welfare practices and mentalities might be conducted. Neither of the latter terms is unproblematic. For the purposes of this article, «welfare» is defined as the resources (cash or kind and however raised, dispensed or organised) expended directly on relief of the poor, thus excluding charitable or communal expenditure on measures such as education, public health or measures such as apprenticeship or vaccination. My focus is also on the «deserving poor», widely defined so as to encompass at the margins the seasonally under- and unemployed but not so widely defined as to include the work-shy, vagrants, etc., who were treated in a remarkably uniform way throughout Europe. Such divisions introduce potential biases to the analysis. Historian might, in conventional thinking, observe very different spatial patterning within and between European states if they were to map attitudes towards, and welfare outcomes for, the sick poor as opposed to the unemployed, for instance. Nonetheless, a wide definition of welfare in these terms is appropriate when trying to characterise local welfare systems where perceptions of deservingness (single women, for instance) fluctuated, where officials recognised that poverty often had multiple causation (unemployment and sickness usually coincided, for instance) and where a continuing lack of detailed empirical studies make accepted generalisations (the sick poor were usually seen as deserving and prioritised for treatment, for instance) potentially tenuous.


In turn, the concepts of mentalities or sentiments towards the poor – crucial to the identification and mapping of welfare regimes – are also problematic. Putting aside the issue of how we define mentalities and whose mentalities we should be identifying, the particular view of elites and ratepayers of any locality in relation to the poor and their welfare reflects the confluence of a wide range of past and current debates about religion, belonging, literacy, political culture, information circulation and identity played out at both a local and a national level, as well as the scale of poverty and ingrained perceptions of deservingness. If they exist, identifying mentalities and sentiments in the sources involves reading belief systems and feelings into documents that often do not embody them and trying to disentangle discretionary actions from those that flow from the legal and administrative process. I have addressed this issue in previous work on the clothing of the English poor, suggesting that the money recorded as being spent on clothing in charity and poor relief accounts was generally discretionary and that what clothing was purchased can tell us a considerable amount about the attitudinal biases of officials and ratepayers. Even sources that would seem to throw direct light on the mentality of ratepayers – for instance the minutes of charitable bodies or vestries – must be treated with caution as we disentangle formulaic proceedings and posturing from discretionary action that embodies belief and feeling. Yet, if the process of identifying sources and reading them is difficult, this does not mean that the attempt should not be made. In the final section of the article, I suggest how mentalities – or at least their proxies in the sources – might be identified and coalesced into yardsticks that identify broad welfare regimes.

Focusing on the period between the 1750s and the 1860s (the point at which there began a pan-European discussion of the purpose, structure and delivery of welfare, centred particularly around the rights of the unemployed, elderly, sick or children), the article begins with a brief discussion of historiographical approaches to the study of the spatiality of social welfare practices. It will then go on to consider and critique some of the existing ways that historians have attempted to discern spatial unities in welfare practice, organisation, thought and sentiment, and thereby to construct macro-welfare regimes. An ingrained model of English and Welsh exceptionality will receive particular attention. Suggesting that existing models are unsatisfactory, the article will propose a new framework of ideal types for locating and understanding European welfare regimes, and end with some examples – British and European – of how the typological framework might be used to classify existing micro-studies and to orientate future work. The article takes a decidedly socio-cultural approach to the local

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13 In this article, I use the term mentality as a shorthand for societal, particularly taxpayer, attitudes towards the poor and the welfare system in which they were enmeshed.

14 See contributions to King/Stewart, Welfare Peripheries.
history of poverty and welfare rather than engaging with public debate rooted in philosophy, politics or political economy, which would yield a different understanding of welfare regimes and their spatial dimensions while also being a step removed from welfare realities.\footnote{For work on such debates see E. Sage, A Dubious Science: Political Economy and the Social Question in 19th-Century France (New York, 2009) and F. Gouda, Poverty and Political Culture: The Rhetoric of Social Welfare in the Netherlands and France 1815–1914 (London, 1995).}

1. Space, Regions and Regimes

The issue of how, where and whether to draw lines on maps of Europe for the purpose of defining regions has engaged historical geographers, sociologists and historians with interests stretching from industrialisation and labour markets to courtship networks, local cultures, language and mentalities.\footnote{There are also, of course, strongly divergent European traditions of «regional history». See contributions to S. Brakensiek and A. Flügel, eds., Regionalgeschichte in Europa (Paderborn, 2000).} The engagement has not always been auspicious or easy, but one of its striking features is that few of those with interests in demographic, economic, topographical or cultural regions have afforded welfare structures and mentalities much attention, either as variables shaping regional boundaries or as factors in generating regional unity and identity.\footnote{S. King, «Locality and region in the industrialisation process: A European view», in Towns, Industries and Regions: Urban and Industrial Change in the Midlands 1700–1840, ed. J. Stobart (Manchester, 2005), 228–245.}

Axiomatically, welfare historians have, as we have seen, been reticent in considering (except at the broadest level, something to which the article returns below) the comparative spatial dimensions of European welfare structures. To some extent, this is unsurprising given the problems with defining a comparative frame of reference. European countries exhibit markedly different records of data collection and preservation in respect of the different strands of the economy of make-shifts, a reflection of factors such as the differing role and reach of the central state, the timing of the rise of the information state, and war and fluctuations in sovereignty. By way of a single instance, for England and Wales the historian can find many thousands of pauper letters, important documents for establishing the attitudes of paupers and officials, whereas these sorts of documents are completely missing from Ireland. In a situation common across Europe, where there was a disjuncture between what was supposed to happen in welfare terms according to the law or royal decree and what actually did happen, the presence or absence of quality local records impacts on the ability of the historian to recover a detailed perspective on welfare regimes. Even where records are of good and continuous quality, a second problem in defining a frame of reference is that it matters which elements of poor relief or the pauper host are chosen as the basis for identifying spatial regularities in welfare structures, outcomes and mentalities. Equally, times
of socio-economic or demographic crisis would be expected to yield different patterning in terms of policies, welfare outcomes and sentiment to those that might be found at «normal» times, as studies of England, Grenoble and various Prussian towns in the eighteenth and nineteenth centuries demonstrate to excellent effect.  

Of course, having defined a frame of reference, welfare historians also face the same sorts of problems that confront others when trying to identify regions physically, reconstruct their internal dynamics and central points of unity and compare them. Three particular generic issues stand out in the context of this article. The most obvious, and something already dealt with briefly above, is how to determine the point at which local and regional variation in practice, outcome and sentiment (in so far as these can be traced) is so broad that it becomes impossible to talk about a physical area having an essential unity of experience. A second and related issue is where to draw the physical boundaries of a region given that they shift to reflect exogenous (loss of sovereignty, for instance) or endogenous (the rise of a new town or the development/dislocation of industry) influences, nationwide changes in systems of belief or information exchange and knowledge. This issue is compounded by a third generic issue: a tendency for broad-brush conceptions of regions or regionality to become peppered with micro-studies that emphasise the exceptionality of certain areas or even whole countries. Without stable ideal types, or at least without a mechanism to categorise regions along an experiential, structural, attitudinal and organisational spectrum, it becomes very difficult indeed to talk on a pan-European basis about welfare regimes.

These issues are important, and the article returns to them below when it talks about the range of yardsticks that might be used to create ideal-type welfare regimes, but they have not prevented welfare historians from talking at the very broadest level about the spatial patterning of national welfare systems and mentalities. Cunningham, for instance, has drawn a contrast between Catholic southern and Protestant northern Europe in terms of the supply and origin of welfare resources, the organisation of welfare and the mentality that lay behind welfare provision. The overriding influences on this macro-contrast were the Reformation and Counter-Reformation, with their impact upon basic underlying ideological structures. For Cunningham there is a most striking north/south difference, running precisely along the fissure between Protestantism in the north and renewed Catholicism in the south. In the north from the Reformation onwards, provision of health care and poor relief, in all its changing ways, came to be seen as the responsibility of the community as a whole, not something to be left to the vagaries of individual charity. In the south, by contrast, from before and still after the Counter-

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Reformation, personal charitable giving was deemed to be in itself a Christian duty, which was an essential part of true Christian living.\textsuperscript{19}

Neither the Enlightenment nor Napoleonic attempts to impose large-scale centralised institutions for the treatment of poverty on these southern states made a profound impact on ingrained attitudes towards welfare.\textsuperscript{20} Indeed, «The Catholic church still jealously guarded charitable institutions from state takeover for as long as it could»\textsuperscript{21}, such that southern European countries by the late eighteenth century had a «vast range»\textsuperscript{22} of extra-state institutions and charities to provide relief for the deserving poor,\textsuperscript{23} although Lindert suggests that in such Catholic countries «church and private giving probably offered the poor a plethora of moral instruction and a pittance of material aid»\textsuperscript{24}.

This broad north-south characterisation, embedded in a distinction between the supposedly collective welfare ideas of Protestants and the charitable imperative of Catholics, is however insecure. Robert Jütte has pointed out that «centralisation, bureaucratisation and communalisation of welfare was by no means a Protestant prerogative» and that from the seventeenth century there was «a sort of secularisation of poor relief on either side of the confessional frontier».\textsuperscript{25} This does not mean that Catholic welfare had no distinctive features – the reasons for charitable donation,\textsuperscript{26} the moral intent of poor relief in whatever form, the longevity of relief etc., might still be seen as distinctive – but that welfare outcomes were neither so uniform nor so different from Protestant countries as a simple north / south or Protestant / Catholic characterisation of welfare regimes suggests. Thus, in both Catholic and Protestant areas there were wide differences in the scale, organisation, nature and outcome of welfare between communities of the same type or in the same area.\textsuperscript{27} This undermines the idea that anything called «Catholic» or «Protestant» welfare can be identified.\textsuperscript{28}
In terms of outcomes, organisation, power and structures of welfare, both southern and northern countries witnessed extensive state and community intervention in poor relief to combat extraordinary events linked to weather, war or economic dislocation. Even in «normal» times, there were important similarities between Catholic and Protestant communities along a spectrum of welfare organisation and finance that ranged from national tax-funded institutions in England and Wales or situations where «donors, churches and taxpayers were intertwined by law» as in France or the Netherlands, to systems based largely upon private philanthropy that were «simpler in [...] revenue base and negligible in amount» Thus, religious orders and charities dispensed welfare in nineteenth-century Protestant and Catholic Ireland, seventeenth- and eighteenth-century Protestant and Catholic France, and decidedly Protestant Scotland. Welfare in parts of Catholic Austria was largely focused in state-sponsored institutions, while McHugh and others have shown convincingly that personal charity remained the cornerstone of relief for the poor in general, and the sick poor in particular, in many parts of Protestant France. This partly reflects the fact that state / royal and municipal funding intertwined with religious and lay philanthropy (in so far as these are themselves useful distinctions) in complex and subtle ways in all or parts of most European states.

One place where there was little such complexity was Protestant Scotland. Here organised and voluntary charity was almost the sole recourse for the poor, and the scope, intent, administration, language and philosophy of welfare in most Scottish communities had more in common with some areas of Spain or Italy than with those closer to home in England or the Netherlands. More generally a revitalisation of the secondary literature on philanthropy has emphasised the pivotal role of

localities, see L. Frohman, Poor Relief and Welfare in Germany from the Reformation to World War I (Cambridge, 2008) and G. Steinmetz, Regulating the Social: The Welfare State and Local Politics in Imperial Germany (Princeton, 1993). See also P. Blum, Staatliche Armenfürsorge im Herzogtum Nassau 1806—1866 (Wiesbaden, 1987).

See N. Davidson, «Poor relief and health care in southern Europe, 1700—1900: The ideological context», in Grell / Cunningham / Roeck, Southern Europe, 34–51.

Lindert, Growing Public, 41 and 43.


M. Scheutz, «Demand and charitable supply: Poverty and poor relief in Austria in the 18th and 19th centuries», in Grell / Cunningham / Roeck, Southern Europe, 52–95; Timothy McHugh is currently working on a Wellcome–funded project to look at charitable networks in rural Brittany.

See for instance Davis, «Health care», 16–18, who notes the continuing importance of a «multiplicity of smaller foundations and institutions» for poor relief in Italy but also draws attention to the radical welfare reforms undertaken in Tuscany and to the secularising and bureaucratising tendencies to be seen across Italy in the late eighteenth century.


https://doi.org/10.17104/1611-8944_2011_1_42
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charitable donation even in societies – like England and Wales – with an organised and systematised poor law. In short, the differences between Protestant and Catholic and northern and southern welfare provision were by no means as distinct as has often been imagined, running at community or regional levels along a complex structural, ideological and experiential spectrum ranging from a reliance on charity and subventive (that is, responding only to immediate need) communal relief at one end, all the way to comprehensive, preventive and even generous communal provision (however funded) at the other.

Other commentators have attempted to construct spatially located macro-regimes that reflect similarities of structure, policy or philosophy between smaller groups of countries. For the very end of the period considered here, Christiansen and Petersen have suggested that there was a recognisably «Nordic» (including Norway, Sweden, Finland, Denmark and Iceland) welfare system, underpinned by a «strong capacity for national integration» and a common set of political structures and principles that resulted in sustained and comprehensive collective provision. Other groups of countries have also been yoked together. Riis, in his 1981 Aspects of Poverty in Early Modern Europe, offered a four-strand typology of early modern welfare systems, with a «North Sea» grouping (including England, Holland and later the Scandinavian countries) developing the most comprehensive non-institutional welfare systems. Van Voss also identifies a «North Sea» welfare state model, one in which early collective provision in the states or areas bordering the North Sea was at least partly driven by a belief in the idea that poverty was remediable rather than inevitable.

For the understanding of welfare state development in the twentieth century, such spatial divisions have some purchase. The period before 1860 is a rather different matter. Patriquin has argued eloquently that the countries bordering the North Sea can be shown to have had enduringly different welfare structures and

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37 For an overview, see R. Jütte, Poverty and Deviance in Early Modern Europe (Cambridge, 1994).


philosophies judged at the national level, themselves intimately related to the scale and speed of proletarianisation.\textsuperscript{42} Drilling further down, the work of Nottingham and de Rooy and Gouda points to very significant regional and intraregional variations in welfare practice and outcomes within North Sea countries.\textsuperscript{43} In terms of a Nordic model, it could be argued that some Danish cities, where welfare was consistently topped up by compulsory taxation, have more commonalities in welfare terms with the towns of western and southwestern England than with other Nordic communities, where a compulsory boarding system rapidly developed.\textsuperscript{44} Similarly, Markkola argues that the mixed economy of welfare in Finland (which included compulsory local taxation to fund institutional care, for instance) closely resembled that in England.\textsuperscript{45} In Norway, the differences in the scope, scale and organisation of welfare between Oslo and the northern regions, or the differences in the experiences of the native and indigenous populations, were as wide as between Scotland or Ireland and England.\textsuperscript{46} Thus, while efforts to discern macro-regions from groups of contiguous countries may be appealing, they are not unproblematic.

Attempts at drawing a wider comparative framework have been no easier. John Stewart and I have recently argued that we might conceive of a welfare core / periphery model in which «peripheral countries» such as Wales, Ireland, the Netherlands, Scotland, Sweden, Finland, Denmark and Norway shared many of the core characteristics that would lead to similar welfare development paths. Small numbers of individual policy makers, the need to develop welfare structures that (however they were financed) could deliver to relatively small populations over varied terrain, the particular nature of urbanisation, the symbolism of welfare structures as an expression of autonomy and contiguity in the face of often unstable national and international politics, the disproportionate impact of religious ideology and the often unbalanced nature of economic growth in these places, all worked, we argue, to create similar trajectories. To be sure, the nuances may have been different, but in terms of the underlying practical operation of welfare systems, the community ideologies that underpinned them, and their symbolic and practical value, we suggest that there was something about being «peripheral» that created distinctive welfare regimes. In this sort of theoretical construct,
Welsh communities, particularly in the northern and middle belts of the country, might be conceived as having more in common – in terms of the residualism of community support, harsh attitudes towards deservingness and the centrality of private charity to the economy of makeshifts – with communities in Scotland, Ireland or even Italy than with those of England with which they notionally shared a common welfare platform.\footnote{See S. King and J. Stewart, «Death in Llantrisant: Henry Williams and the New Poor Law in Wales», \textit{Rural History} 15 (2004), 69–87. See the important contrasts within Piedmont elaborated in G. Farrell-Vinay, «Welfare provision in Piedmont», in Grell / Cunningham / Roeck, \textit{Southern Europe}, 250–288, as a point of comparison.}

Yet, while such spatial interlinkages are appealing, they also present problems. We regarded Denmark and Scotland as peripheral, but Copenhagen did not resemble Glasgow either in terms of the scale and causation of poverty or the complex charitable and municipal responses developed by the Danes. In fact, Glasgow had more in common (in terms, for instance, of the scale and nature of charitable resources and the importance of personalised charity) with German industrial or port centres such as Hamburg than it did with urban areas in other «peripheral» welfare regimes.\footnote{See R. Jütte, «Health care provision and poor relief in early modern Hanseatic towns: Hamburg, Bremen and Lübeck», in Grell / Cunningham, \textit{Protestant Europe}, 108–128.} There are also important questions about the group of countries encompassed by the term «periphery». Switzerland, for instance, would certainly be regarded as peripheral in spatial terms and many of its core societal, socio-economic and political features would, in our scheme, cement its peripheral identity. And yet, as Anne-Lise Head and others point out, the Swiss welfare system has striking commonalities in terms of finance, structure and outcome with its English (and non-peripheral) counterpart.\footnote{A.-L. Head and B. Schnegg, eds., \textit{Armut in der Schweiz, 17.–20. Jahrhundert} (Zurich, 1989).}

None of these critical observations about attempts to discern macro-welfare regimes should suggest that the concepts themselves lack broad utility. Religion, cultural identity (in the Nordic fashion) or the rash of socio-economic, topographical and political variables that run together to define a country as «peripheral» matter considerably for the nuances of welfare policy and the experience of the poor. Other attempts to carve out welfare lines on the map of Europe are also important. Most recently, for instance, Patriquin has attempted to draw distinctions between the welfare regimes associated with the early and intensive onset of commercialised/capitalised agriculture and those linked to more traditional agricultural forms.\footnote{Patriquin, \textit{Agrarian Capitalism}, building on similar early observations by scholars such as Woolf, \textit{The Poor} and T. Horne, \textit{Property Rights and Poverty: Political Argument in Britain 1605–1834} (Chapel Hill / NC, 1990). Yet, if they retain utility, these and other attempts (not all of them documented here by any means) to classify welfare regimes are also flawed, most particularly by the persistent and significant «polluting factor» of regional and intra-regional variation in welfare structure, practice and mentality within...
nation states. The importance of this issue is best demonstrated in relation to one of the most enduring spatial distinctions on the European welfare map, the so-called English (and Welsh) exceptionality.

2. English and Welsh Exceptionality

England and Wales have long been characterised as uniquely early in having a legally defined national poor law system. Founded in 1601 against the backdrop of impertible inheritance, early commercialisation of agriculture, the Reformation and rampant price inflation that had eroded the value of charitable endowments at the same time as rapid population growth had exacerbated poverty, the Old Poor Law was well-established by the early 1700s.51

Until recently, this institution was regarded as distinctive in several ways in addition to its statutory basis. Firstly, it was financed by a local tax on property, enforcing obligatory income transfers, and was linked to settlement laws that defined broad entitlements to welfare. By 1700 «poor rates» (and their corollary of the cash dole as a major form of relief) were virtually universal in England, though in Wales they spread more slowly. Innes has argued that this local tax constituted England’s singularity within Britain and more widely.52 Secondly, England and Wales were relatively unique in using the secular parish (and in large parishes, individual townships) as the territorial basis of a national welfare system: elsewhere religious structures were more often the basis of relief, as in the case of religious confraternities in Italy, or the Kirk session in Scotland. Although the expense of the rate-based English system was often viewed unfavourably abroad in the eighteenth and nineteenth centuries, this was offset by admiration for the close supervision and involvement of local citizens – the parish overseers – in relief administration. Thirdly, from the sixteenth century the power of the English central government was mediated through the magistracy which, with numerous provisos raised by Peter King, did have a levelling influence on local administration.53 Magistrates, in effect, made and remade the poor laws. Finally England was distinctive, it has been argued, not so much in the range or types of relief for the poor (the concept of the mixed economy of welfare now being firmly entrenched) as in the early centrality of parochially financed relief in the overall economy of makeshifts.54

This sort of spatial patterning, crudely termed as «England versus the rest», has not gone unchallenged. Grell and Cunningham, for instance, have questioned...
whether there was any functional difference between a local tax and a «semi-public» system of subscriptions and door-to-door collections with a strong moral imperative to contribute. Commentators have also confirmed Woolf’s observation that many European communities had the theoretical power to tax property in order to fund relief and also extended his initial thought that only Scandinavian countries did levy such taxes. Innes has emphasised that at the broadest level, the similarities between England and the Continental states in terms of the way poverty was conceived, numbers were relieved and the nature of welfare was dispensed are striking. Lindert has gone further, claiming that English distinctiveness in the scale, nature and motivation for relief is to be located only between the 1790s and 1830s. At the other end of the Old Poor Law period, Warde uses evidence from Leonberg (in Württemberg) to suggest that English and Welsh distinctiveness in welfare terms was a product only of the eighteenth century and the fact that many Continental communities retained a sufficiently rich economy of makeshifts to avoid «the development of a dominant single mode of welfare provision». Even first impressions of the distinctiveness of the New Poor Law can be misleading. This supposedly draconian measure was nowhere near as intrusive as its Scottish or Irish equivalent, and English officials never got the power of their German counterparts to incarcerate paupers in workhouses under the force of the law.

Above all, to see England and Wales as distinctive depends upon viewing the Old and New Poor Laws as uniform or relatively uniform national systems. This is problematic. In 2000, I suggested that variation of local practice, sentiment and experiences of the poor was so pronounced in the century starting from the 1730s that, arguably, we might talk not in terms of one poor law but several contiguous, and to some extent overlapping, welfare regimes, each with a spatial unity and demonstrating a distinct tendency for the north to be much less generous than the south. Such a view is not uncontroversial: spatial variations might simply reflect different financial capacities in different regions rather than a difference of

55 Grell / Cunningham, «The Reformation», 32.
57 Innes, «State, church».
sentiment or mentality. Moreover, intraregional variation in poor law practice and the experiences of the poor might be more important than regional variations so that welfare historians’ attempts to understand the Old Poor Law should focus on the operation of the parish state and its corollary of a patchwork of welfare republics. Hindle has been particularly critical (though focusing on a slightly earlier time period to the one I employed) arguing that the idea and practice of regional welfare regimes has been significantly overdrawn. On the other hand, Elizabeth Hurren suggests that the broad spatial divisions outlined in my initial formulation of the argument survived and are emphasised during the crusade against outdoor relief under the New Poor Law of the late nineteenth century. Kim Price’s analysis of the attitudes of nineteenth-century poor law unions to medical care and their professional medical officers also confirms these divisions. And Margaret Lyle, while critical of the exact spatial divisions I employed, nonetheless uses data on the treatment of bastardy under the Old Poor Law to show that there were strong and enduring regional patterns here, too. Finally, John Stewart and I have argued that the regionality of the English poor law did not stop at the border of Wales. The Welsh border parishes had more in common with Lancashire than they did with other Welsh communities. They were, in other words, part of a wider welfare regime that strayed beyond established country boundaries.

For the purposes of this article, however, whether regional or intraregional variation in the practice, outcome and mentality of the Old and New Poor Laws was more important matters much less than the accepted fact of significant spatial variation. If such variation is to be found in a country supposedly subject to a single national welfare system, then it must have been writ large in other European states. In turn, significant spatial variation in practice and sentiment might amount to the observation that England did not have a «system» of poor relief that can be compared in broad shorthand to that in Continental states. Whether it does or not, the fact of spatial variation means that the residualist and exclusionary welfare regime in an area such as industrial Lancashire had much more in common with South Wales or urban Austria than it did with the capitalist agricultural areas of eastern and southeastern England. In short, to understand the spatial dynamics of welfare on the European stage, and to avoid «trying to find local, particular, explanations

61 Hindle, On the Parish?
for phenomena which in fact were common», there is a need for a new conceptual model for the classification of local and regional welfare regimes.

At one level, this should be a straightforward task. After all, some of the practical and ideological drivers in the provision of welfare transcended country boundaries across Europe: the constant need to ration welfare resources; the elision of the language and rhetoric of deservingness not only with economic circumstance, social position and religious belief, but also with the moral state of the applicant and his or her kin; the inadequacy of communal relief however it was financed and given; the fact that the depth and value of the economy of makeshifts varied more by region than it did by country; and the fragility of supply of welfare resources, whether funded by compulsory taxation or voluntary donation.

Notwithstanding this common backdrop, at another level refining a model to generate comparative welfare typologies is problematic. Such a model must do the following: transcend the «noise» of micro-studies and reactions to exceptional events in order to drill down deeper to core experiences, structures and official mentalities; be applicable both to the study of the poor as a group and subsets of the poor such as the aged or the sick; be sensitive enough to allow communities to move between ideal types as circumstances or mentalities are perceived to change, even if those changes are rapid and recurring; be sensitive to exogenous variables such as changes in the law; have enough typologies of welfare regimes to allow for their grouping and patterning on a physical map; be flexible enough to accommodate differences in the nature and scale of sources between areas and countries; and deal with welfare regimes as both dependent and independent variables. Of course, this is a Herculean task beyond the scope of a single piece or individual, but the final section of this article suggests some tentative steps towards such a model. In particular it draws on the English case because of the volume of published work on welfare compared to elsewhere and because modelling very different welfare ideal types in a country notionally unified by a single system of poor relief provides a controlled laboratory.

3. An Analytical Framework

Addressing all of the desirable criteria for a model of the welfare regimes outlined above, and in the process generating a portable classificatory system, involves two conceptual stages. The first is to define a series of key yardsticks that can be used to drive new, or interpret existing, micro and regional studies. These yardsticks must encompass indicators by which one might judge the essential character of a local / communal or regional welfare regime in terms of scope, finances, welfare practice, control / power, the experiences of paupers and the mentalities of officials and ratepayers. No lists of this sort will be uncontroversial or (especially within the

context of different country settings) complete. Nor will each be applicable to all situations given different contextual and source settings, especially when it comes to obtaining definitive evidence on mentalities. Nonetheless, generating a set of standardised measures by which one can characterise a local welfare regime is a crucial precursor to intra-national and pan-European comparisons. A reading of English and Continental micro-histories suggests that this list of key yardsticks might include seven variables, as set out in Table 1, page 59.

It will be clear from Table 1 that the suggested yardsticks focus little on the socio-demographic or religious context in which welfare was executed. In practice, very different coalitions of contextual variables of this sort can yield the same sorts of mentalities and welfare outcomes or experiences (evidenced in the patchwork of intraregional variations identified by increasing numbers of commentators) and it is this basic architecture of the local and regional welfare regime that the yardsticks are supposed to capture. The yardsticks do not include a direct assessment of the nature of funding. As we have seen, the source of welfare funding is not always clear even at the level of single institutions; primary source evidence on funding is often poor, the interrelationship between different elements of the economy of makeshifts sometimes unclear and, in any case, what matters is less where welfare resources came from than how regular they were, how they were dispensed and how generous the payments were. Moreover, Table 1 makes little reference to the legal dimensions of poor relief. As the sheer scale of intraregional variation in practice and resources devoted to welfare in England demonstrates, the national legal context was often unimportant.

Rather, and reflecting the work of Keith Snell on poor relief, identity and belonging, these yardsticks attempt to assess and typify the ingrained sentiment of the poor relief system (whether tax-based or charitable) and the related experience of being poor. They are numerous and interrelated enough to cope with the fact that data deficiencies may limit the detailed exploration of some variables (both within and between countries). They are also flexible enough so that addressing issues such as governance, for example, could be achieved both directly through analysis of minutes of ratepayer meetings or indirectly through newspaper reportage, pauper appeals or court data. And these yardsticks encompass both direct indicators of mentalities (inspection, surveillance, intent / sentiment) and proxies for sentiment (symbolism, contestability, adequacy and navigation), permitting all but the poorest source contexts to fall within the broad-based model. Collectively, at least in the English case, they provide the foundation for a systematic understanding of the experiential, structural and attitudinal spectrum of welfare.

Yardsticks of practice, structure, experience and mentality in the English poor law system

<table>
<thead>
<tr>
<th>Yardstick</th>
<th>Key empirical question</th>
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| Governance         | • Were poor relief resources, whether communally or charitably generated, controlled by independent office holders, the politico-taxpaying elite, religious leaders or groups with a wider democratic mandate? In other words, were governance structures open or closed?  
  • What were the exogenous checks (magistrates, etc.) on independent governance?  
  • What was the historically ingrained structure of local and regional welfare governance, in so far as this would influence the reception of new laws and discourses?  
  • How were regional or national welfare laws framed? Were they general and enabling, allowing local interpretation, or specific and obligatory, limiting local freedoms?  |
| Institutional focus| • To what degree were welfare resources (however generated) delivered institutionally, both at that point in time and over the pauper life-cycle?  
  • To what degree were these generalised, catch-all institutions rather than tailored to specific sub-groups of the poor?  
  • To what degree were paupers free to access and leave these institutions?  |
| Inspection and surveillance | • To what extent were the poor subject to, or thought themselves to be subject to, intrusive inspection by local officials and their agents?  
  • To what extent were different elements of the economy of makeshifts mutually exclusive?  
  • Were there definite and known mechanisms for applications and the distribution of relief?  
  • Did these issues vary according to the life-cycle stage of the pauper?  |
| Navigation         | • Were the rules of the welfare regime transparent, anchored in law and stable, or were they opaque, anchored in custom and past practice and unstable?  
  • Could paupers predict the response of a welfare regime to a given set of circumstances?  
  • Could paupers know or learn the rules?  
  • Were decisions contestable?  |
| Symbolism          | • Did poor-relief regimes (charitably, communally or individually financed) seek to mitigate, highlight or increase the symbolism of being poor in terms of material indicators such as clothing, housing, diet, etc.?  
  • To what degree was relief (however funded, organised or distributed) tied to structures of deference and gratitude?  
  • Where was relief given and with what strings attached?  |
| Adequacy           | • Did poor relief (in terms of the collective charitable, communal or individual resources available to people) provide enough for paupers to live on?  
  • If not, how «generous» was the welfare regime?  
  • If not, did officials seek partnership with paupers and families in their treatment of the poverty problem?  
  • Was relief regular and predictable and did it come in a utilisable form?  |
| Intent and sentiment| • Was the local/regional welfare regime based upon sentiments that were broadly disciplinary/dissuasive, customary, minimalist or humanitarian?  
  • Was the link between those who financed welfare and those who received it direct (as for instance in the payment of local taxes or charitable levies) or indirect (as for instance with bequests to centralised charities)?  
  • Were the poor seen as belonging to the community?  
  • How did beggars figure in the overall relief structures? |
Meanwhile, a second conceptual stage takes these empirical yardsticks and brings them together to create – and populate with existing and future micro-studies – ideal-type welfare regimes which can then be plotted on a map. In the English context, four such regimes, might be discerned, which are outlined below:

- **Entitling regimes.** That is, welfare systems where governance of access to poor relief was relatively open and exogenous checks on governance relatively strong; where institutional relief (communal or charitable) was uncommon/unstable, supportive and disproportionately tied to particular life-cycle stages; where inspection and surveillance were, and were seen to be, periodic and the outcomes usually benign; where paupers could negotiate clear rules; where officials and communities were sensitive to the material symbolism of poverty; where relief may not have been adequate but it was nonetheless substantial and regular and partnership with families was desirable albeit not a mainstay of the relief process; where the ingrained sentiment of those financing relief was favourable to the right of the poor to make claims on charity and community based upon a sense of belonging; and where decisions were, and were seen to be, contestable.

- **Exclusionist regimes.** That is, welfare systems where governance of access to poor relief was closed (particularly, for instance, through vestries or paid officials) and exogenous controls patchy; where institutional relief (communal or charitable) was used to deter present or future relief applications or to provide minimum possible levels of care; where inspection and surveillance were regular features of establishing and maintaining entitlement and the outcomes of such inspection were, for paupers, uncertain; where rules for establishing entitlement were not anchored and were difficult to learn; where the symbolism of poverty was a weapon for both pauper and provider in their attempts to establish entitlement; where relief was residual and potentially irregular, and partnership with families was a first, not a last, option for officials; where the ingrained sentiment of those financing relief in its different forms was to question the right of the poor to make claims; and where contestability was not a reality.

- **Obligatory regimes.** That is, welfare systems where governance of access to poor relief might be either open or closed, but was in any case usually subject to exogenous checks; where institutional relief was persistently uncommon; where inspection was irregular but nonetheless periodic and the potential outcomes of such inspection were well-known; where the rules for establishing entitlement were anchored in law and the moral economy, could be known in advance and would yield a broad range of known outcomes so long as communal obligations were balanced against pauper obligations; where the symbolism of poverty was a highly charged practical and socio-political issue; where relief was tailored to the
exact and changing needs of the individual; and where the ingrained sentiment of welfare providers was favourable to the claims of the *deserving* poor, however defined.

- **Disciplinary regimes.** That is, welfare systems where governance of access to poor relief was institutionalised and extra-local, with either few or many exogenous controls; where institutional relief was a main plank of welfare; where inspection was a key technique to discipline and deter and where the outcomes of such inspection could not be predicted; where the rules for establishing entitlement were anchored in law and precedent; where the symbolism of poverty was a problem for the poor rather than the community; where relief was residual; and where the ingrained sentiment of welfare providers was the minimisation of present and future claims on resources.

Naturally, any attempt to reflect widely and holistically on the English welfare system will be both contentious and susceptible to assertions of exceptionality. Moreover, it is also easy to imagine, and trace in micro-studies, different combinations of the key yardsticks outlined in Table 1, and thus to generate for England more or fewer «welfare regimes». Certainly, the process of generalising any such model to Continental states would probably require more ideal types. In this process, it would thus be possible or desirable to formulate a broadly defined «improvement regime», in which governance of access to poor relief in all of its forms was relatively narrowly controlled but with strong exogenous checks; where institutional relief (communal or charitable) was common; where inspection and surveillance were regular and the expectations of such inspection clear; where paupers could negotiate clear rules; where welfare agents were extremely sensitive to the material symbolism of poverty; where relief may not have been adequate but it was nonetheless regular; and where the ingrained sentiment of those controlling access to relief was the need to save / re-educate / improve the poor. In such a regime, relief would not be a *right* for the poor, but it might be an obligation for the community of which they were a part. There will, of course, be other potential ideal types. Indeed, historians have much to learn from attempts by modern commentators to make sense of the still-significant national, regional and intraregional variations in European welfare practice. Thus, Gough et al. and Saraceno develop an eight-strand spectrum of ideal types, ranging from «Rudimentary Assistance» and «Selective Welfare» at one end to «Centralised Discretionary» regimes at the other, in which the three main classificatory yardsticks are extant and salient features of welfare, structure and generosity.69

Focusing on the number of potential ideal types, however, is to miss the essential point. Whatever their number and underlying characteristics, these welfare regimes provide a reliable way to think about the essence of welfare spaces. They can be applied to the experiences of all paupers or simply subgroups, like the sick poor, such that a particular area or community might be classified as a disciplinary regime for one group and an entitlement regime for another. Moreover, the model is sensitive to change; it is perfectly possible for an area to demonstrate one ideal type in the 1750s and another in the 1790s, though collectively the underlying yardsticks are sufficient in number and depth to ensure that short-lived changes in practice, pauper experience or official sentiment would leave the characterisation of the welfare regime intact. The ideal types are also flexible enough to reflect community responses to fundamental changes in welfare law, while at the same time ensuring that real practice is elevated above the theory of the law. In the English context, the result of this flexibility is that relatively few communities would have changed their long term classification at the advent of the New Poor Law in 1834. Moreover, these ideal types provide a way of transcending the «noise» of micro-studies and intraregional variation in practice, experience or sentiment, and of thinking about wider spatial constellations of welfare places. Broadly speaking, it is possible for a region, say the industrial northwest of England, to have representation of all of the ideal types mentioned above. Indeed, and as Hindle has pointed out, this is quite likely. The key question, however, is whether an area generates a critical mass (the threshold of which might be moved to link the characterisation to a narrower or wider range of experiences) of the same «type» as multiple micro-studies emerge. In the industrial northwest of England, there is already a clear critical mass of micro-studies that favour the «exclusion regime». The rural counties in the immediate environs of London would probably have a critical mass in favour of the «obligatory regime», while in the east and southeast of England it is difficult to escape the characterisation of a wide-ranging «entitlement regime». More widely, applying this scheme to my own previous understandings of the regionality of the Old Poor Law yields a much more subtle gradation of experience, less orientated towards a harsh north and liberal south than I had first thought, but with a very distinct tendency for western England to demonstrate «disciplinary» and «exclusion» ideal types. And, of course, even a situation in which no obvious critical mass is found (as might be the case in much of Wales, for instance), the lessons of observing a truly «mixed» economy of welfare would be profound.

Above all, the application of the yardsticks and resulting ideal types suggested here facilitates comparison on the European stage, allowing historians to eschew broad country comparisons and instead look for welfare patterning that transcends religious, spatial, source, cultural and even socio-economic boundaries. Thus, my work on Liverpool and its hinterland would suggest that it oscillated between
«exclusionary» and «disciplinary» welfare regimes from the late eighteenth century, with a focus on institutional relief at an early date, patchy exogenous control of local welfare policy, residualist welfare payments, decision-making in which morals (and ethnicity) played a key part, and a determination to minimise future claims. In these terms, Liverpool (and the wider southwest Lancashire area) might be placed in the same ideal type as Hamburg, Toledo or Lyon rather than with Manchester or the manufacturing towns of Cheshire. In turn, the Manchester region, with a broadly conceived «obligatory regime» (one that I have explored extensively elsewhere), had much more in common with similar regimes in industrial and proto-industrial Yorkshire, Belgium (particularly Ghent) and Provence than with the exclusionary regimes of much of the rest of Lancashire. And, the «entitlement regime» of much of urban and rural southeast England, rooted as it was in a sense of the belonging of the poor, has significant resonance with welfare practice in Switzerland, southwest France and even Piedmont.

4. Conclusion
The study – particularly the comparative study – of welfare regimes raises multiple and interconnected issues of spatiality. While historians have often been content to draw the spatial comparisons in the broadest terms, defining macro-regimes based upon shared religious philosophy, cultural heritage, shared experience of capitalism or peripherality, these approaches sometimes obscure as much as they reveal. In each of the European states, regional and intraregional variation in the scale of welfare resources, the nature of their deployment, the experiences of paupers and the sentiment that underpinned welfare administration is increasingly shown to be profound. This applied even to England and Wales, notionally subject to the same standardising welfare law.

This article has suggested that we can make broad sense of such variation by creating ideal type welfare regimes against which to compare or orientate micro and regional studies. These ideal types are not uncontroversial, but they do allow welfare historians to investigate below the «noise» of who gets what, what the law says should have happened in welfare terms, how welfare was financed and whether welfare was communally, voluntarily or religiously orientated. They focus on the intent and sentiment – the mentality – of the welfare system and the experiences of the paupers that were subject to it, and in so doing facilitate comparison...
across European space and time. Naturally, problems remain. In particular, the yardsticks that underpin the welfare ideal types described here might need to be augmented to cope with the particular source problems of different European states, while the ideal types themselves probably need to expand in number to deal with some of the more complex Continental, particularly southern European, regional welfare regimes. These problems, however, are ultimately soluble and indeed must be so if European welfare historians are to generate the vital framework for systematic comparative studies of the sort which debates about eighteenth- and nineteenth-century welfare conspicuously lack.

**Welfare Regimes and Welfare Regions in Britain and Europe, c.1750s to 1860s**

This article is concerned with the models that might be used to classify and compare welfare regimes in different European states prior to the broad convergence of welfare debates and structures of the late-nineteenth century. Reviewing existing models («Nordic» welfare systems, confessional divides, welfare peripheries, etc.) the article contends that a more sensitive set of comparative yardsticks is needed if welfare historians are to break out of a cycle of research that has come to focus overwhelmingly on intra-state regional and intraregional differences in welfare inputs and outputs. It suggests that welfare historians might talk in terms of four broad regime types – entitled, exclusionist, obligatory and disciplinary – anchored less in how welfare was funded or organised and more in issues of sentiment and intent. Taking up such a model, the article argues, allows a much more sophisticated frame of comparative reference than one which is based upon broad confessional divides or the sense that countries like England and Wales were somehow «different».
Britische und europäische Wohlfahrtsregime und Wohlfahrtsregionen von den 1750er bis zu den 1860er Jahren


Régimes sociaux et politiques sociales régionales en Grande Bretagne et en Europe de 1750 jusqu’aux années 1860

Cet article se soucie des modèles qui pourraient être utilisés pour classer et comparer les régimes sociaux dans différents pays européens antérieurs à la large convergence des débats et structures relatifs aux politiques sociales de la fin du 19ème siècle. Passant en revue les modèles existants (les systèmes sociaux nor- diques, les divisions confessionnelles, les périphéries du système social etc.), l’article soutient qu’un ensemble de critères de comparaison plus sensible sera nécessaire si les historiens veulent sortir d’un cycle de recherche qui s’est lourdement focalisé sur les différences intra-région-Etat et intra-régionales des recettes et dépenses des systèmes sociaux. Il suggère que les historiens des systèmes sociaux pourraient parler dans les termes de quatre larges types de régimes – allocatif, exclusif, obligatoire et disciplinaire – moins ancrés sur la question comment le système social a été fondé ou a été organisé, mais et davantage sur les questions d’opinion et d’intention. Adopter un tel modèle, argumente l’article, permet un cadrage de référence comparatif bien plus sophistiqué que celui qui repose sur des larges divisions confessionnelles ou le sentiment que les pays comme l’Angleterre ou le Pays de Galle étaient de quelque manière différents.

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