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SCOTT BLINDER

# CITIZENSHIP AND NATURALISATION IN THE UK: TRENDS IN DATA, POLICY, AND THEORY

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Immigration has become one of the most salient issues for policy-makers and members of the public in Britain over the course of the past ten to fifteen years. Amidst historically high levels of immigration and growing ethnic diversity, all three major political parties—Labour, during the previous government from 1997-2010, and the Conservatives and Liberal Democrats, during the current coalition government—have participated in making policies that have restricted immigration to Britain, and added requirements for immigrants within the country who seek British citizenship or the right to settle permanently in the UK.

This article will show how citizenship and immigration have become increasingly intertwined in Britain, both in data and in policy-making. Of course, in the current context, it may seem natural or even inevitable that citizenship policy should be essentially a facet of immigration policy. Yet, as argued below, this has not always been the case; on the contrary, the current set of connections between citizenship and immigration are more recent developments, stemming largely from the political salience of immigration as an issue.

### **Citizenship and Immigration Policy**

For at least the past decade, immigration has been a heated political topic in Britain, widely discussed in highly polarized and often emotive terms. Immigration—along with the related policy areas such as citizenship and asylum—has been the subject of an active legislative agenda (Somerville 2007). In the thirteen years of the previous Labour government, there were six major acts of Parliament dealing with immigration, asylum and citizenship (Mulvey 2010). The current Coalition government has undertaken significant policy changes to family, work, and student immigration as well as changes to policy on settlement (or permanent residency) and citizenship.

This policy activity has taken place against a background of heightened public concern, and is quite likely a response to this concern. Since 2001, immigration (technically, “immigration and race relations”) has appeared consistently among the top five and usually the top three issues on the public’s list of the most important issues facing Britain, according to the polling firm Ipsos MORI’s monthly data (Jennings and Wlezien 2011). This growing salience overlaps with a

significant rise in the numerical level of immigration to Britain as well as “net migration”—the difference between immigration and emigration in any given period. Public attitudes continue to favour reducing the number of immigrants coming to Britain rather than increasing or keeping it the same. This preference has been consistent over a number of decades (Blinder 2011a); what is new is the consistently high ranking on the public agenda.

In this context, politicians have sought ways of creating barriers to migration to Britain, and have also created new barriers to attaining citizenship or its prerequisite for most new citizens: permanent settlement. The government has added requirements such as a minimum income for high-skilled labour migrants wishing to become permanent residents, a test of cultural integration (the Life in the UK test), and stronger and more broadly applied English language requirements. It has also restricted the number of categories on a “pathway to citizenship”, confining this path mainly to immediate family members of citizens or settled migrants and certain high-skilled labour migrants with jobs at high salaries (Tier 2 visa holders).

In this context, it is easy to presume that citizenship policy—and indeed the concept of citizenship—is essentially another form of immigration control policy. Citizenship may appear to be exclusively about determining which individuals have the legal status that entitles them to reside in a country without risk of removal by the state. After all, citizenship is that special status that belongs to full members of the political community. Most migrants do not partake of this status when they first arrive in Britain. The few who arrive as citizens—such as people born abroad to British parents—may technically qualify as migrants as well, but they are neither subject to immigration controls (Anderson and Blinder 2011) nor widely thought of as migrants among the general public (Blinder, forthcoming).

On the other hand, migrants are in other ways marginal to the discussion of citizenship. Although millions of people migrate internationally every year, the vast majority of the world’s population acquires citizenship or nationality at birth, and retains that status. Inheritance of citizenship or nationality as a birthright, then, is far more common than acquiring a new citizenship through migration.

In fact, migration and national borders were not prominent in earlier political and scholarly discussions of citizenship in Britain. T.H. Marshall’s tripartite conception of citizenship (Marshall 1963) dominated British academic discussion

in the post-war twentieth century (Turner 2001, 2009; Evers and Guillemard 2013). Marshall's historical-theoretical account of citizenship traced the development of the concept from its origins in civil rights through expansions to the inclusion of political and finally social rights as well. These stages show first the gradual transition from the feudal subject to the free and, ideally, equal citizen (although see, e.g. Pateman [1989: 184-5] on the inequality stemming from exclusion of women from the full package of rights and benefits available to male citizens as the British post-war welfare state was constructed).

Marshall divided citizenship into civil, political, and social components. The civil sphere marks out basic individual liberties, the political sphere involves participation in democratic or republican self-governance, and the social sphere involves rights to some basic level of economic security and well-being. (Marshall 1963). Viewed through this lens, what is most important about citizenship is not how it is acquired, but what it confers upon its holders. In fact, Marshall has been criticized for failing to emphasise the responsibilities that come with citizenship (see Turner 2001), although some argue this criticism is misplaced (Johansson and Hvinden 2013).

Equality was also critical to Marshallian citizenship, although in a particular, circumscribed way (Evers and Guillemard 2013). While citizens may receive different rewards from markets, civil society, and other individuals, the state must treat them all equally *qua* citizens. Marshallian citizenship was thus concerned with the rights and privileges of citizenship, and to some degree the duties as well. Citizenship was framed as a way to overcome class divisions in the name of a more integrated political community, although not as a way to eliminate market-based economic distinctions (Evers and Guillemard 2013). The notion of citizenship as a means of regulating the boundaries of the political community was at most an afterthought.

In the academy, Rogers Brubaker's work led a sea change in conceptions of citizenship, foregrounding its boundary-regulating function rather than the rights-granting function. Brubaker (1992) showed that citizenship fundamentally excludes as well as includes; while granting rights to citizens, it also prevents access to those same rights for those outside its boundaries—even if they reside within the state's territory (Joppke 2010a). His work highlighted the two different ideal-typical regimes for granting citizenship—*jus soli* and *jus sanguinis*—exemplified by France and Germany, respectively.

Reading Brubaker's alongside Marshall's and others' views of citizenship as conferring rights and responsibilities on its holders, we might view citizenship as regulating access to a particular package of rights and privileges. All citizens are entitled, equally, to this package, but non-citizens are presumptively not entitled to make the same claims. This is not to say that non-citizens have no claims on the state, particularly if they are residing within its borders (see Soysal 1994, Miller 2008). But it is normally seen as legitimate for the modern democratic state to grant a superior set of rights and privileges to citizens—in essence, discriminating on the basis of citizenship in a way that would be clearly illegitimate if done along the lines of, say, race, gender, or other identity categories (Miller 2000). States can regulate access to this package of right and privileges in two ways: by regulating access to its territory (immigration control) or by regulating access to citizenship for those already residing within its physical borders (citizenship policy). Thus, it is easy to see how, in today's context of immigration as a political issue in Britain and across Europe, immigration control and citizenship policy can become two sides of the same coin.

Some political developments in Britain were ahead of the academic literature in reconsidering the relationship of citizenship to access to the political community, rather than just a package of rights and privileges. It is worth noting that the concept of British citizenship emerged during the breakup of the British Empire (and, again, from the vestigial notion of the “subject”); as a result, early developments took a remarkably “laissez-faire” approach to citizenship as territorial boundary (Hansen 2000). As Hansen (2003) notes, in the 1940's, hundreds of millions of British Commonwealth subjects across the world had, in theory, full access to UK territory. This was “a nationality policy with immigration consequences” (Anderson 2013). The policy theoretically kept British territory open to many millions, but large-scale immigration was not envisioned as a likely result. The priority for policy-makers was in maintaining a system of nationality and subjecthood (Hansen 2000, 2003; Anderson 2013). Only later, as immigration flows increased (although still small compared to today's levels), did policy-makers begin to reshape citizenship policy in response to actual and potential migration to Britain. It was not until 1962, for example, that immigration controls began to apply to British Commonwealth (and Irish) citizens (Ryan 2010), and immigration and citizenship policy began to become more tightly linked.

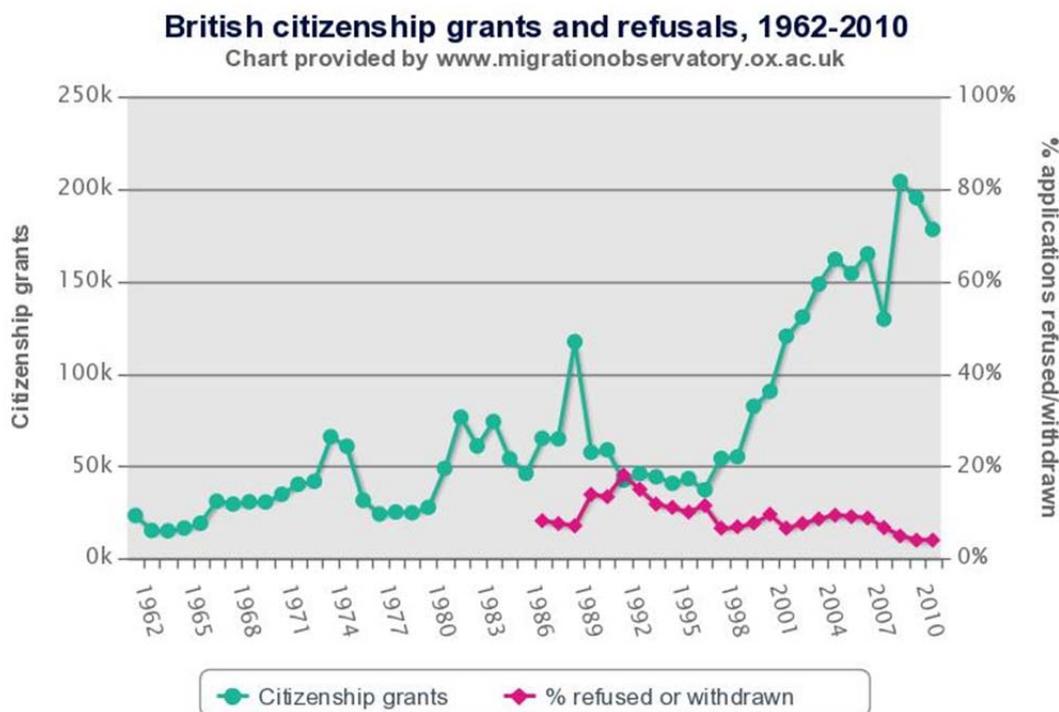
## British Citizenship: Data

The increasing attention to migration in citizenship policy is tied to an increasing prominence of immigrants—defined as the foreign-born or as former foreign nationals—in the British population. This is shown quite clearly in official data sources on citizenship, which track the rise of ‘naturalisations’ or grants of citizenship over time.

First, as befits an increasing concern with tracking new citizenship grants, the Home Office official administrative data dates from 1962, the same time that immigration controls began to apply to the Commonwealth. Second, consistent with higher levels of immigration, citizenship grants to foreign nationals have increased dramatically in recent years. As Figure 1 shows, British citizenship grants to foreign nationals reached 195,130 in 2010, the highest level in statistics recorded since the 1960’s (Blinder 2011b). Allowing for some year-to-year fluctuations, the trend has been sharply upward since the mid-1990’s. As late as 1997, there were only 37,010 new grants of citizenship to foreign nationals—the lowest annual number in the period since the implementation of the 1981 British Nationality Act (which took effect in 1983). Numbers were higher in the 1980’s, but did not approach the levels of the past five to ten years.

Figure

1



Citizenship data tables Immigration Statistics, Oct–Dec 2011, Table cz.03

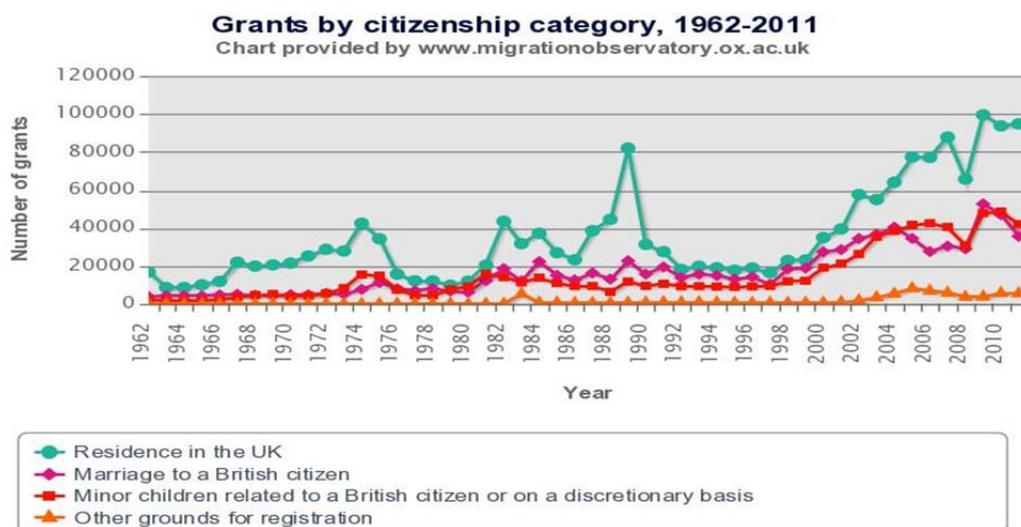
These high rates of naturalisations have continued even though aspirants to British citizenship now face a growing set of obstacles, including knowledge of the English language and of “Life in the UK” (a measure of cultural integration), six years of continued residency (for the residency path to citizenship), and a complex and expensive application (Sawyer 2009). But despite these increasing legal barriers to citizenship, Britain has granted citizenship to a growing number of foreign nationals in recent years, with only a relatively small decline in recent years after a much larger pattern of growth since the late 1990’s.

In light of policy changes creating or strengthening barriers to naturalisation (discussed below), it is notable that the pace of actual naturalisations has not slowed, at least so far. In fact, the take-up rate for citizens has increased from the 1990s to the 2000s, from 2.0% of the previous year’s foreign-born population in 1995 to 5.7% in 2005 (Castles and Miller 2009), although falling to 4.5% by 2010 (OECD 2012). Further, as Figure 1 also shows, citizenship applications have become more likely to succeed, with less than 4% of applications refused or withdrawn in 2011 compared to over 10% for most of the 1990s, although this seems to be mostly due to improved administrative procedures rather than policy change (Home Office 2010: 10). Still, it is worth noting the increase not only in the number of naturalisations but also in the take-up rate and success rate, especially in light of the new barriers to citizenship discussed later in this paper, such as the Life in the UK test and English language requirements.

### **Citizenship Data: Pathways to Citizenship**

This section discusses the main routes to citizenship, and trends in naturalisations in each of these main pathways. Residency in the UK, plus an additional year as a settled migrant (with ILR), is the most common path to naturalisation, as shown in Figure 2 below. The residency pathway to citizenship includes relatively extensive requirements. In most cases, UK citizenship is available to foreign nationals only after the attainment of “settlement,” or, officially, “indefinite leave to remain” (ILR). For eligible migrants—essentially, high-skilled labour migrants from outside the EU—ILR can be attained in five years of continuous UK residence. This means that citizenship by this route requires six years of residence: five to attain ILR, plus an additional year with ILR status. The requirement had been five years total, with ILR attainable in four years, but the additional required year was added in 2006.

Figure 2



Source : Citizenship data tables Immigration Statistics, Oct–Dec 2011, Table cz.03

Furthermore, it is important to note that mere residency does not suffice as a path to citizenship. Only individuals with particular sorts of immigration status accumulate time toward settlement and citizenship. Foreign nationals in Britain on student visas, temporary (‘Tier 5’) work visas, or, since 2010, Intra-Company Transfer (‘Tier 2’ ICT) visas, for example, are not on a “path to citizenship”; their presence on British territory does not amount to “residency” that will fulfil the requirements for citizenship. To attain ILR and then citizenship, such individuals would need to attain a new immigration status and then live in the UK under this new status for five years in order to be eligible for citizenship. This normally involves getting a high-earning job that qualifies for an employment-based Tier 2 visa, or marrying a British citizen or settled migrant (or becoming engaged or entering a civil partnership).

In April 2011, new income requirements were added for those seeking citizenship as high-skilled labour migrants from outside the EU or EEA (European Economic Area). To attain ILR, Tier 2 visa holders and similar visa holders must be earning £35,000 when they apply for settlement. This requirement does not apply to family visa holders, but there is a new minimum salary for those wishing to enter the UK under a family visa. The ‘sponsor’ (the spouse or partner in the UK) will now need to earn at least £18,600 per year under new family migration policy implemented in 2012. Language requirements for family-based migration have

also been heightened, and moved to affect entry rather than just settlement or citizenship.

As one might infer from the above discussion, family membership accounts for the other main routes to settlement and citizenship in the UK (see Figure 2). There are two distinct categories to note. Family-based citizenship grants go mainly to spouses (and fiancé[e]s or civil partners) who naturalise, and children who were either born in Britain to migrant parents or who come to Britain as migrants with their parents, and who can therefore be registered as citizens. For example, children of migrant parents can register for citizenship when their parents naturalise, without having to fulfill the same requirements themselves.

Taken together, grants based on residency, on family-based naturalisation, and on registration of minor (below age 18) children comprise the vast majority of citizenship grants in Britain. The few remaining grants, in the “other” category, are mainly related to people with various post-colonial forms of British nationality who wish to change to standard British citizenship. Official data from the UK government’s Home Office note that there are still six types of British nationality (Home Office 2013b: 51). The majority are simply British citizens, but there are several categories linked to British overseas territories and former colonies (British overseas territories citizens, British overseas citizens, British nationals (overseas)—a special category for people from Hong Kong), and even British subjects<sup>1</sup> and British protected persons. The “other” category in Figure 1 above, representing a small percentage of total grants of citizenship (3% of the total for 2011), includes individuals in such categories exercising their entitlement to “register” as British citizens. These cases, like grants of citizenship to children when their parents become citizens, are considered “registration” rather than “naturalization”.

In short, access to citizenship through employment and residency has become more difficult to attain, even though it is the most common type of new citizenship grant. Citizenship policies are relatively open toward marital partners, children, and British non-citizen nationals, but access to British territory as a migrant has become more difficult for spouses, who now face

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<sup>1</sup> British subjects “normally hold that status either: (a) by virtue of their birth in Eire (now the Irish Republic) before 1 January 1949; (b) because they were BSs before 1 January 1949 through a connection with a place which became a Commonwealth country on that date and, although they were potentially citizens of that country, did not acquire citizenship of that or any other country before 1 January 1983” (Home Office 2013b: 51).

English language requirements for themselves and income requirements for their marital partner in Britain.

### Citizenship Data: Who Naturalises and Why?

Citizenship data on the national origins of new citizens also show a continuing role for post-colonial immigration to Britain, extending well beyond the small fraction that become citizens due to status as a British national in another form. As shown in Table 1, the largest two prior nationality groups to gain British citizenship in 2011 were Indian and Pakistani nationals, together accounting for just a quarter of all new citizens.

**Table 1. Top ten prior nationalities of new British citizens, 2011**

Country	Number of British citizenship grants	Percentage of total citizenship grants
India	26,290	15%
Pakistan	17,641	10%
Nigeria	7,932	4%
Philippines	7,133	4%
China	6,966	4%
South Africa	6,351	4%
Sri Lanka	5,886	3%
Iraq	5,742	3%
Iran	5,540	3%
Bangladesh	5,149	3%

Source: UK Home Office, Immigration Statistics.

By contrast, European nationals are much less likely to become British citizens, even if they come from countries of relatively high migration to Britain. European nationals, including non-EU/EEA residents without freedom of movement to and from the UK, consistently represent only a small fraction of new British citizens. European nationals (including non-EU/EEA Europeans) accounted for 10% of grants of citizenship in 2011. EU nationals (excluding British citizens) comprise a much larger share of immigration in-flows to

Britain—31% of immigration in-flows to Britain in 2011, and 27% six years earlier in 2005 (Vargas-Silva 2011).

Lower rates of take-up among EEA nationals are suggestive evidence for the primacy of instrumental motives for seeking citizenship, and thus for the view that citizenship has become relatively less valuable, at least for those who already have territorial access and residence rights (Anderson 2011, Joppke 2010b, Rutter et al. 2008). Since nationals of EU/EEA countries have freedom of movement in and out of Britain, they have no need to acquire citizenship in order to secure residence rights. Similarly, as EU nationals they cannot be legally discriminated against in labour markets or in provision of social benefits. Ryan (2010) notes some practical advantages of citizenship with respect to security of residence and free movement: citizens are much more secure against deportation than non-citizens; Indefinite Leave to Remain can be lost by long-term absence from Britain; travel within the EEA becomes freely available. But again, these apply to non-EEA nationals (unless EEA nationals are worried about changes in Britain's relationship with the EU/EEA that would alter their freedom of movement across borders).

In this context, citizenship secures very few concrete benefits, especially for EU/EEA nationals. Voting rights in national elections are one benefit of citizenship; however, given the lack of instrumental value of a single vote in a large-scale election, voting is more a social act than an instrumentally valuable right in itself (Downs 1957, Rolfe 2012). Even then, EU citizens who are resident in the UK can vote in local and European elections.

Further examining grants of British citizenship to European nationals provides equivocal support for Anderson's and Rutter and colleagues' accounts. Grants of citizenship to European nationals were made disproportionately to Europeans in non-EU countries. As Table 2 shows, among the top ten European nationalities gaining British citizenship in 2011, only Poland (2<sup>nd</sup>) and France (10<sup>th</sup>) were EU members with full access to residence and work in Britain. The rest of the top ten European countries were either non-EU members (Turkey, Russia, Kosovo, Albania, Ukraine, and Serbia) or recent accession countries with only restricted access to labour markets (Bulgaria, Romania).

On the other hand, if the account from Anderson and Rutter and colleagues is correct, the increase in British citizenship among Polish nationals may come as a surprise. Polish migration to Britain increased sharply, of course, after Poland and the rest of the "A8" countries joined the EU in 2004 and Britain (along with

Ireland and Sweden) did not implement transitional restrictions on these nationals' access to its labour markets.

Migrants arriving in 2004 began to become eligible for citizenship through residency in 2010, or 2009 at the earliest—not coincidentally, grants of British citizens to Polish nationals rose sharply in 2010, and rose again in 2011 to 1,250. This may seem small relative to the half-million Polish-born residents of England and Wales as of the 2011 Census, but only the leading edge of the post-accession migration inflow will have eligibility for citizenship at this point, given the six year required residency (plus attainment of ILR) for labour migrants to become citizens.

**Table 2. Top ten prior European nationalities of new British citizens, 2011**

Country	British citizenship grants
Turkey	3,627
Poland (EU)	1,863
Russia	1,442
Kosovo	1,248
Albania	1,045
Ukraine	1,041
Bulgaria (EU with transitional labour market restrictions)	969
Romania	566
Serbia	533
France	491

Table Notes: Data from UK Home Office. \* = EU member; \*\* = EU member but with transitional restrictions on nationals' UK labour market access until 2014.

The naturalization rate has not kept pace thus far with the dramatic growth in the Polish-born population of Britain, which increased approximately tenfold between 2001 and 2011. Nonetheless, it has increased more than one might expect if citizenship had become purely instrumental. Between 2004 and 2009, Polish nationals received an average of 594 British citizenship grants per year; in 2011, the figure of 1,863 was more than three times the 2004-2009 annual average.

## Citizenship and Immigration Policy

The above sections have shown sharply increasing citizenship grants to migrants, even though EU/EEA free movement has tempered this trend by reducing incentives for migrants to naturalise. The remainder of this paper will shift from data back to policy, arguing that policy-making in Britain illustrates the growing intermingling of immigration and citizenship policy, as scholars such as Joppke, Anderson, and Hansen have argued. In particular, I further demonstrate two distinct ways that migration and citizenship are increasingly intertwined. First, the policy and politics of citizenship have become increasingly concerned with regulating access to citizenship for migrants, rather than with the rights and obligations of all citizens. Second, the policy and politics of immigration control have begun to reconfigure citizenship, in ways that may be marginal to the conception of citizenship overall but at the same time have significant consequences for particular citizens—including British-born as well as foreign-born citizens—who may find that their relationship with the state has changed markedly because of the politics of immigration control (Anderson 2013).

The tenor of UK citizenship legislation has changed markedly since the onset of larger-scale immigration in the late 1990's. When New Labour took power in 1997, immigration was estimated at 327,000 for the year, a figure that would rise to 589,000 by 2004. Net migration, the difference between arrivals and departures, would rise from 48,000 to 245,000 in the same period (Vargas-Silva 2011). Meanwhile, public preferences for reduced levels of immigration—always the position of a large majority of the British public—became much more politically salient over the same time period (Jennings and Wlezien 2009).

The political salience of immigration coincided with a shift in the Blair government's approach to citizenship that broadly maps onto a shift from Marshallian concerns with the content of citizenship to concerns with citizenship as a filter for would-be members of the national political community. As Anderson (2011) notes, the Blair government's initial agenda for citizenship policy contrasted its preferred vision of "active citizenship" with citizenship as involving "passive" use of public services with little sense of reciprocal obligation (Mayo and Rooke 2006).

It is worth noting that the Labour government's rationale for active citizenship was born at least in part out of pragmatic, instrumental concerns. Andrews and colleagues (2008) argue that New Labour's active citizenship was

intended simply to make provision of public services more effective, although Mayo and Rooke suggest multiple motives, including goals of “deepening democracy” and changing the balance between rights and responsibilities that reflect more abstract, political-theoretical concerns.

Nonetheless, even if this instrumental rationale was prominent in the government’s own justifications for its citizenship agenda, its actions extended into less immediately instrumental realms. The government initiated the 1998 policy review of citizenship education that ultimately led to a new requirement for citizenship education in secondary schools (Crick 1998). Led by the political philosopher Sir Bernard Crick, in this vision citizenship education was to be primarily about “political literacy” (Osler and Starkey 2006), equipping all citizens with the necessary knowledge to exercise their civic rights and responsibilities. The Crick Report cited Marshall approvingly, noting the importance of including all three elements of Marshall’s triptych. It did, however, claim that Marshall overlooked the role of society as opposed to the state in ensuring a robust form of social citizenship (Crick 1998: 10-11).

Crucially in this context, the Crick report treated citizenship as fundamentally about the rights and privileges (and duties) of citizens, broadly similar to Marshall in this sense. The boundary-maintaining function of citizenship did not play a role, nor did any other sort of relationship to migration. In fact, Osler and Starkey (2006) criticize Crick’s vision for its neglect of the “cultural and personal elements” of citizenship, or, in other words, the ways in which individuals of different cultural backgrounds or personal characteristics such as gender and sexual orientation might experience citizenship differently. Again, this mirrors Marshallian equality rather than later visions of citizenship that were more concerned with migration and multiculturalism.

However, the tenor of the political discussion was changing, even in the interim period between the Crick report and the resulting 2002 implementation of the citizenship curriculum. These changes would give new prominence to a boundary-drawing version of citizenship, at the expense of Marshallian citizenship as rights and privileges. Several events in 2001 increased the salience of migration and “social cohesion”—the September 11 terrorist attacks in the US, controversy over the French refugee camp at Sangatte, and perhaps most important in this context, a series of riots in the Northern England towns of Bradford, Burnley, and Oldham (Saggar et al. 2012, Anderson 2011). Government interpreted the disturbances in these Northern towns as indicating problems

with community cohesion, or integration of and relationships among diverse groups in society. The Home Office-commissioned “Cantle Report” featured a concern that residential segregation of migrants and ethnic minorities from majority-group white Britons was compounded by separation in all aspects of life, with harmful and even explosive consequences (Cantle 2001).

Soon thereafter, Crick again led another government-initiated review, but this time to aid in developing proposals specifically in the context of immigration and naturalization, under the auspices of the newly created Advisory Board on Naturalisation and Integration (Kiwani 2007). In this new climate, Crick’s group focused more on the relationship between migrants and British citizenship. In contrast with the outcome of the earlier Crick report—a universal recommendation for citizenship education—the outcome this time was a test of knowledge to be required exclusively of foreign nationals wishing to attain British citizenship. The “Knowledge of Life in the UK” test, first implemented in 2005, and then in 2007 shifted to the stage of settlement (ILR), became a necessary precursor on the road to citizenship for most types of migrants, although in some cases the Knowledge of Life in the UK requirement could be fulfilled by completing an officially-authorized course on the English language that included a citizenship education component (Kiwani 2007). As Joppke (2013) shows, this policy shift was part of a broader European trend that saw citizenship as something to be earned (for foreign nationals, of course, as it makes little sense to talk of earned citizenship for those who are born with that status).

By the time that Gordon Brown initiated a new review of citizenship in 2007, the concern for active citizenship, applied to all citizens in the 1998 Crick report and the new secondary school curriculum, had likewise become tied more explicitly to naturalising, foreign-born citizens. Late in the Brown government, Labour was developing plans to make “earned citizenship” a component of naturalisation, perhaps by adding a new requirement of community service.

Other changes to naturalisation policy in this period introduced additional barriers, some apparently linked to concerns with social cohesion and others less so. For example, English language requirements were strengthened and extended to spouses of citizens in 2004, and extended to apply to applicants for settlement in 2007. A citizenship ceremony and oath of loyalty were added as new symbolic requirements. The logic of social cohesion seems less relevant to increased fees, which might exert a deterrent effect on naturalisation,

particularly among those such as EU nationals with little concrete benefit to gain by becoming British citizens. Fees were increased in 2013 to £851 for an adult, £1317 for a couple, and £2144 for a family of four; these charges come on top of fees to obtain an initial entry visa and further fees (£750 per person) for indefinite leave to remain. On the other hand, given implicit associations among poverty, culture, and identity (Anderson 2013), it is possible to read increased fees as enacting an identity- or cohesion-based concern even while explicitly differentiating only on the basis of income. As citizenship becomes less exclusive to a set of people defined by common ethnic or ancestral ties, governments may feel pressure to take action to restore the traditional basis of citizenship in these forms of identity, yet given modern anti-discrimination norms, they can do so legitimately only in policies framed without explicit reference to these identities (Joppke 2010b).

The Conservative-led coalition government did not pursue Labour's plans to implement 'earned citizenship' requirements. It did maintain the Life in the UK test, and in fact developed and implemented a revised version that includes a new emphasis on British history and culture. At the same time, the new version deliberately removed items from the test that assessed would-be citizens' knowledge of their rights as citizens, particularly those rights involving access to the benefits of the welfare state (Home Office 2013a). Thus, Britain followed the Netherlands in the small group of liberal democratic countries that tested would-be citizens' knowledge of national culture rather than the more common, and more confined, set of topics on the legal rights and responsibilities of citizens (Joppke 2013).

### **Citizenship of Rights, Citizenship of Boundaries**

How should we assess these changes? First, recent trends in Britain seem to show a new emphasis on citizenship as boundary, rather than Marshallian equal privileges and duties for citizens. Successive governments have acted to make citizenship more difficult to attain, and in the process have tied discussions of citizenship more closely to discussions of immigration (and integration of migrants). Moreover, these changes have occurred in tandem with restrictions on immigration, and in the context of a formal government-led review of citizenship that have linked citizenship ever more tightly with immigration and related concerns about social cohesion across cultural lines. Citizenship policy

seems increasingly concerned with citizenship as a way of maintaining boundaries.

But what is the true relationship between citizenship-as-boundary and citizenship-as-rights? Are recent developments in citizenship and immigration policy evidence of tension between citizenship of civil, political, and social rights and citizenship of boundaries and regulation of access (Joppke 2010a)? This question raises at least two difficult empirical questions, which this paper will have space to answer only in a preliminary way.

First, we might ask how the trend toward boundary-enforcing citizenship policy affects the package of rights and privileges that citizens receive. Does it leave this basic package relatively undisturbed, or does it weaken citizenship for all? Or perhaps the reverse is true, and boundary-enforcing citizenship policy is necessary to preserve or strengthen the citizenship of the welfare state.

Second, we might ask how the new citizenship requirements fit into a picture of instrumentalised, devalued citizenship. Policies such as knowledge tests and language requirements have been portrayed as evidence of states fighting a minor, rear-guard skirmish in a battle that has already been lost—citizenship is no longer the exclusive province of an ethnically homogeneous group tied to the state by ancestry and primordial (or primordial-seeming) identities (Joppke 2007). The citizenship policies and debates of the last decade may have strong symbolic resonance but less practical impact on the course of citizenship in Britain and elsewhere in Western Europe.

On the first question, certainly foreign nationals rather than citizens are most directly affected by (most) policy changes in this area. The citizen's package of rights and privileges may well be untouched by restrictions on access to that package. Perhaps citizenship can confer substantial social rights only if access to the state is carefully limited and protected by robust policing of its boundaries, where boundaries may include territorial borders but also barriers to citizenship. Many have argued that an open immigration policy cannot co-exist with a strong welfare state, whether because poor immigrants will place financial demands on the state or because cultural diversity undermines the social solidarity needed to maintain public support for state-provided public goods (Goodhardt 2004, Alesina and Glaeser 2004, Putnam 2007, Joppke 2007). These claims have been contested, however, by research that has not found that ethnic diversity weakens social capital or solidarity, or does so only in a qualified way (Kesler and Bloemraad 2010, Letki 2008, Mouritsen 2012, Sturgis et al. 2011).

On the other hand, the changing migration/citizenship policy nexus may be changing the rights and privileges of at least some citizens in surprising ways. Most prominently, as noted earlier, the British government has recently implemented earnings requirements for British citizens who wish to “sponsor” the migration to Britain of their spouse (or fiancé[e] or civil partner), as well as strengthened English language requirements for the foreign-born spouse. While these are barriers to entry rather than to citizenship, it is worth considering in this context because of its effect on the rights of citizens to have the family life of their choosing within the territorial confines of the UK.

Two points have theoretical significance here. First is the way immigration policy can change the rights and privileges associated with British citizenship at the most intimate level. As part of a package of policy changes aimed at reducing net migration, the government has created policy that creates limiting conditions on its own citizens’ rights to marry and live with the person of their choosing. In other words, barriers to entry and eventual citizenship for foreign nationals have, at least on the margins, affected a right associated with British citizenship (and entrenched by the European Convention on Human Rights, incorporated into British law by the 1998 Human Rights Act).

The second point of theoretical interest is that the policy diminishes citizens’ rights in a way that explicitly differentiates according to income, and *de facto* along other lines such as gender and age. The policy sets an income requirement of £18,600 per year (more for families with children); only individuals earning below this annual level are affected. Particularly because only the income of the citizen and not the projected earning power of the migrant spouse is taken into account, the policy differentiates *de facto* along gender and other lines as well. Based on data available as of June 2012, under the new policy, 47% of British citizens in employment would not qualify to sponsor a spouse as a family migrant, but this percentage increases to 58% for people aged between 20 and 30 and 61% for women, compared to just 32% of men (Migration Observatory 2012). Thus, beyond the restrictions to individual rights, the new family migration policy exists in tension with the notion of equality in the Marshallian (and other) conceptions of citizenship (Miller 2008).

On the other hand, one could argue that this is nothing new or unique to the migration sphere. Citizens with low incomes often face *de facto* limitations on the exercise of their civil and political rights, as enforcement is often expensive in time and money. Thus, while many have argued that a citizenship of social

rights and privileges requires strict limits on immigrants' access to residence and citizenship, we can see one instance where the restrictive immigration/citizenship policy nexus limits the rights of pre-existing citizens, and does so in a way that differentiates access to rights according to income.

The second broader question involved the scale of recent restrictive changes to citizenship policy in the context of a larger trend toward liberalisation. New citizenship tests and language requirements may be simply a rear-guard action in the face of a much broader trend toward wider access to citizenship, including the broad triumph of *jus soli* across Europe (Joppke 2007). In this context, change to the Life in the UK may have symbolic significance but relatively little concrete impact. Only 9% of failed applications for citizenship are rejected for failure to meet the required level of knowledge of English and of Life in the UK (Blinder 2011b). This is not dispositive evidence, since it does not measure the impact of the test as a deterrent to applications. As this issue has yet to be fully studied, it is not yet clear whether the Life in the UK test has affected the number of new citizenship grants.

In addition, migrants may experience language requirements and knowledge tests in ways that defy researchers' and observers' expectations. Such requirements would seem to make the naturalisation process more demanding, especially for those with a weaker command of the English language. (The Life in the UK test is administered only in English.) On the other hand, some recent evidence suggests that most applicants for British citizenship view the experience positively, including those whose applications do not succeed (Gidley 2011, although see MacGregor and Bailey 2012 for an opposing view). Majorities of a sample of applicants reported a generally positive experience, and, importantly, a greater sense of belonging in Britain as a result of the application process (Gidley 2011). In addition, 2001 UK Census data revealed that the vast majority of foreign-born residents in Britain speak at least some English, and most speak it well (Centre on Dynamics of Ethnicity 2013); it appears that most immigrants to Britain do learn at least some English (if they do not arrive with sufficient language knowledge already). Migrants may even experience English language and knowledge requirements as helpful spurs to integration, as long as access to language education is plentiful. New citizenship policies may have positive effects on new citizens as well as posing obstacles.

This is relevant in light of citizenship theorists' debates over whether citizenship is becoming devalued or "lightened" in modern, transnational society

(e.g. Soysal 1994, Joppke 2010b). In evaluating this question, the perspective of naturalising citizens themselves is crucial and may provide surprising answers. As seen above, data show that thousands of Polish and other EU nationals choose British citizenship despite the lack of instrumental value, while Gidley and colleagues find that applying for citizenship has psychic benefits as well. Thus, some migrants continue to place considerable value on citizenship, enough to endure the monetary costs and complex application procedure, even when it confers few obvious instrumental benefits.

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