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The tactics and strategies of naturalisation: UK and EU27 citizens in the context of Brexit

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A sociologist specialising in citizenship and migration, Sredanovic has worked on the meanings and uses of citizenship among migrants and local factory workers in Italy, the implementation of citizenship policies in Belgium and the UK, the comparative study of citizenship policies, the representation of migrants in the media, and asylum policies in Italy. He is currently working on the impact of Brexit on the meaning and value of EU and national citizenships among UK citizens, EU27 citizens and third country nationals in the UK and Belgium.

Abstract: *Using in-depth interviews with British citizens in Belgium, British citizens in the UK who have explored applying for another citizenship and EU27 citizens in the UK, I explore how Brexit impacts decisions among the three groups on whether to apply for naturalisation. The Brexit process has introduced significant uncertainties about its outcome, its impact on the rights and*

mobility of the groups involved and, in the UK, about xenophobia and the economy. Most British interviewees have explored applying for the citizenship of an EU member state—including Belgium, but also Ireland, France or Italy—by residence, ancestry or marriage, in order to safeguard their rights. EU27 interviewees were more ambivalent about applying for UK citizenship, as citizenship would safeguard their rights, but they were uncertain about the desirability of remaining in the UK. I show that the uncertainties linked to the Brexit process make the naturalisation decision time-dependent, complex and uncertain. More generally, I propose to reconceptualise most naturalisation decisions as contingent, tentative and uncertain tactics, rather than well-calculated and foreseeable strategies.

Keywords: Brexit, naturalisation, citizenship, EU citizenship, tactics, United Kingdom

Word count: 8724

Introduction and theoretical frame

In this article, I explore the plans and meanings of naturalisation for UK citizens in Belgium and the UK and for EU27 (EU minus the UK) citizens in the UK, in the context of Brexit. I use Brexit as a moment of major loss of rights to examine the degree to which naturalisation decisions might be considered ‘strategic’. I argue that both the term ‘strategy’ (if used as in De Certeau 1984) and the conceptualisation of naturalisation present in much of the citizenship literature might overestimate the capacity of potential applicants for citizenship to control and plan their naturalisation. I argue that many naturalisations are tactical. This means, first, that naturalisation plans happen in a context in which the applicant has limited capacity to control or foresee the need, implications and outcome of a citizenship application. Second, it means that the plans themselves are not the precise rational calculation that some of the literature implicitly assumes.

The traditional conception of naturalisation (see e.g. the definition in Bloemraad 2004: 392-393), as a moment that follows and completes the settlement and integration of a migrant in a receiving state, has fallen relatively out of fashion in the citizenship literature, as it ignores the continuation of transnational links, mobility practices, 'instrumental' attitudes towards citizenship and the extension of external citizenship (that is, obtained without residence, mainly on the basis of ancestry or marriage). In a previous article (Della Puppa and Sredanovic 2017), my colleague and I argue for a conceptualisation of citizenship that is not necessarily full integration nor simply the acquisition of a passport (see also Ong 1993 for the more instrumental approach to conceptualising naturalisation and Finotelli et al. 2018 for a critique of such an approach). In this article, I tackle more directly the issue of strategising on the decision to naturalise.

The recent special issue of *JEMS* edited by Harpaz and Mateos (2019), is an excellent starting point in the existing literature on naturalisation decision. It has the merit of not only advancing the knowledge of external citizenship in particular but also making explicit theoretical points that are often left implicit in the previous citizenship literature. Harpaz and Mateos (2019) show how citizenship has practical uses that can influence the holders' life opportunities. A global hierarchy of citizenships, based on passport power and the rights available in each country, means that citizens of different countries can have very different opportunities. In such a context, and with a historical weakening of exclusive state allegiance and a rise in international mobility, applicants for naturalisation can take an instrumental approach to citizenship, aiming to increase their current and potential citizenship resources, rather than establishing allegiance to and identification with the state of which they are becoming citizens. Such theorisation continues the work of Schachar on citizenship as property (Schachar 2007), as well as the previous concept of flexible citizenship, which mostly focused on trans-Pacific migrants who managed to acquire U.S. or Canadian citizenship without establishing stable social or, indeed, residential links with the country of naturalisation (Ong 1993, Waters 2003; see also Kim 2019).

There are a few points to add to the analysis of Harpaz and Mateos. First, while the two editors focus on instrumental reasons for naturalisation, in the same special issue, Pogonyi (2019) describes the identity-focused uses of external citizenship. Further, Knott (2019) shows that in contexts in which the acquisition of external citizenship is widespread, naturalising can be routine rather than instrumental or identity-based. More generally, symbolic and practical uses of citizenship can be intimately linked. Being assigned rights is an essential part of the process of identification with the state, and many of those who naturalise may be interested in the availability of rights, even for symbolic reasons, without being sure that they will actually exercise them (Sredanovic 2014).

Second, while Harpaz and Mateos focus on instrumental attitudes on behalf of individuals, governments also pursue different aims when legislating on citizenship (see e.g. Finotelli et al. 2018). Cases in which both the state and the individuals treat citizenship instrumentally include investor citizenship, as Joppke (2019) recognises correctly (see also Džankić 2018, Surak 2020). States alone can also treat citizenship instrumentally, as in the case of the government of the United Arab Emirates buying Comoros passports for stateless UAE residents, rather than granting them local citizenship (see Lori 2019).

Third, focusing on external citizenship, Harpaz and Mateos primarily explore the mobility-related uses of citizenship. A substantial literature shows other practical uses of citizenship, including protection from deportation and migration controls, access to welfare and public jobs and political rights (e.g. Brettell 2006, Ruget and Usmanalieva 2010, Sredanovic 2014, Nunn et al. 2016), and indeed evidence that naturalisation simultaneously strengthens opportunities for both mobility and settlement (Della Puppa and Sredanovic 2017).

Fourth, while the special issue focuses on the strategies of dual citizenship, exchanging one citizenship for another in the absence of tolerance of dual citizenship or, indeed, a stateless person obtaining a first citizenship (see e.g. Petroziello 2019) also require strategies. Pan (2020) further points out how the decision to *not* naturalise, particularly when there is no access to dual

citizenship, also calls for strategising, in particular in reference to legislative changes in the rights of denizens.

Fifth, some research argues for the need to avoid methodological individualism, showing the role of family in guiding naturalisation—for example, a parent naturalising mainly to transfer the citizenship to the children (Street 2014; see also Soehl et al 2020; Labussière and Vink 2020).

Finally, and crucially for the present analysis, Harpaz and Mateos (Harpaz 2019, Harpaz and Mateos 2019), as most literature on citizenship, focus on the baseline inequalities, in terms of life opportunities, between holders of different citizenships, giving less attention to variations in such inequality between individual citizens and over time. While some studies (e.g. Mateos 2019, Surak 2020) focus on how class differentiates naturalisation chances (and on how external citizenship reinforces class inequalities), and recognise that citizenship can work as insurance against potential future crises in the country of residence (Ong 1993, Tintori 2011, Harpaz 2015, Surak 2020), there has been less examination of how the naturalisation decisions themselves develop in time. Some registry-based quantitative studies (Peters et al. 2016; Labussière and Vink 2020) consider legislative reforms as a factor in changing the volume and timing of naturalisations, but the registry approach limits the insight into the decisional process of those naturalising. The main theoretical contribution to the temporality of naturalisation remains the concept of protective naturalisation—that is, the idea that naturalisations increase in response to legislative change that reduces the rights of non-citizens, or even in response to political climates that might bring such legislative change (Coutin 2003, Gilbertson and Singer 2003, Nam and Kim 2012). More recent analyses specifically address the impact of the global economic crisis on the acquisition of citizenship among mobile EU citizens (with Graeber 2016 arguing that the crisis has increased the propensity to naturalise, and Alarian 2017 arguing the opposite).

Shifting the focus from baseline inequalities to specific right-changing events also suggests also that many naturalisation practices and plans could be tactics rather than strategies, if one follows De Certeau's (1984) definitions. Tactics, according to De Certeau, are practices one conducts in a

situation in which one does not have a complete vision of the context in which a choice is made, and in which one has limited control of that context. De Certeau defines strategies as choices of those who can see the entirety of the context in which the choice is taken and who, although not necessarily dominant, are among the actors that can have at least some influence on the rules of the game.¹ While the issue might seem semantic, distinguishing between strategies and tactics can bring a deeper theoretic understanding of naturalisation. Ideas such as that naturalisation aims to *maximise* the utility linked to a passport bring assumptions with them—sometimes explicit and sometimes implicit in the literature—that risk both overestimating the stability and the foreseeability of the hierarchies of citizenship and oversimplifying the decisional process behind a naturalisation.

In the next pages, I present Brexit as a context for the research, the methods I used, and the results of the interviews with UK and EU27 citizens, respectively, before presenting conclusions.

The Brexit context

In this article I explore Brexit as a process that is deeply changing the citizenship rights of several groups, including EU27 citizens in the UK, who will not be protected by EU norms starting in 2021; British citizens (in the EU27 or elsewhere), who have lost their EU citizenship; and third-country nationals with interests in both the UK and the EU27, who are losing the mobility opportunities between the UK and the EU based on naturalisation (see e.g. Della Puppa and Sredanovic 2017).

A long uncertainty has characterised the Brexit process. After the 2016 Referendum, the UK government and the EU started to reach an agreement about their future relationship and the rights of the groups impacted only in 2018. A long stalemate in the UK Parliament kept then open the possibility of a no-deal Brexit without a transition period and, to a lesser degree, of a cancellation of

Brexit for most of 2018 and 2019. Brexit was enacted on January 31st 2020 after the Conservative victory in the UK elections of December 2019. However, at the moment of writing there are still uncertainties about the relationship between the UK and the EU after the transition period ending on December 31, 2020.

In addition to the certain effects of Brexit enacted on January 31, 2020, EU27 citizens in the UK and UK citizens in the EU27 have had, and still have, worries about losing the right to stay and work (MacClancy 2019; Benson 2020; Genova and Zontini 2020; Luthra 2020; Sotkasiira and Gawlewicz 2020) and limits to their mobility (Sredanovic 2020a; Sredanovic and Della Puppa 2020). EU27 citizens in the UK also worry about the rise of xenophobia (Guma and Jones 2019; Lulle et al. 2019; Rzepinkowska 2019; Benedi Lahuerta and Iusmen 2020; Sime et al. 2020) and the future of the British economy (Sredanovic 2020a). Some research suggests the presence of internal differentiation within the two groups. Benson and Lewis argue that many white Britons in the EU27 felt othered for the first time (Benson 2020), while for Britons of colour the othering reflected continuity with pre-Referendum experiences (Benson and Lewis 2019). Similarly, some research shows how for Eastern Europeans in the UK the post-Referendum othering was in continuity with their pre-Referendum experience, while Western Europeans often found it a new experience (Lulle et al. 2018; Rzepinkowska 2019; Brahic and Lallement 2020).

In this context, research with EU27 citizens shows an increase in orientation towards both naturalising in the UK and leaving the country (Lulle et al. 2019, McGhee et al 2019, Moreh et al. 2020). Lulle et al. (2019) show an internal stratification in terms of unequal resources available to either settle or migrate again successfully. The survey that McGhee, Moreh and Vlachantoni conducted with EU27 citizens in the months before the Referendum led the authors to argue that Polish citizens in the UK in those months were shifting from ‘deliberate indeterminacy’ (i.e. having open-ended migration plans that EU freedom of movement enabled) to ‘undeliberate determinacy’ (i.e. opting for naturalisation in answer to Brexit uncertainty) (McGhee et al. 2019), and suggested a stronger orientation towards naturalisation among Eastern Europeans, those with children, and those

having more recently arrived in the UK (Moreh et al. 2020). More generally, the available studies suggest that further, Brexit-related, migration among EU27 citizens in the UK is mediated by the typology of migratory experience (Trąbka and Pustulka 2020) and imaginings about the future (Sredanovic 2020a) and that some of the current return migration might be linked to biographical moments more than to Brexit (Klimavičiūtė et al. 2020).

Methods

The research presented here is ongoing and based on in-depth qualitative interviews conducted starting in the summer of 2018, with UK citizens residing in Belgium, UK citizens residing in the UK who had explored applying for another citizenship as a result of Brexit, and EU27 citizens residing in the UK. The interviews are part of a larger study on Brexit's impact on the values and meaning of citizenship, in which I am also interviewing citizens of India in Belgium and the UK (interviews not presented in this article). I have conducted 16 interviews with UK citizens in Belgium, 5 interviews with UK citizens in the UK, and 31 interviews with EU27 citizens in the UK. The interviewees have been contacted mostly through social media (in particular through Facebook groups dedicated to national groups and to migrants in general, and through Twitter), with further contacts using the snowball approach.

The interviewees' ages range mostly from the mid-20s to the late 40s, with some among the UK citizens in Belgium in their 50s to 70s. Among the British interviewees in Belgium, the group of interviewees is balanced by gender, while the EU27 interviewees comprise 21 women and 10 men, and all the British interviewees in the UK are women. The group of interviewees is skewed towards the middle class, especially among the UK citizens in Belgium (this is also linked to the high number of professionals working in connection with EU institutions in the Brussels area). The EU27 interviewees slightly under-represent the Eastern European member states; they are from

Italy (7), Spain (5), Poland (4), Croatia (4) France (3), Germany (3), Greece (2), Austria (1), Belgium (1) and Hungary (1). The Britons interviewed in Belgium had resided in the country at the moment of the interview between few months and more than 40 years; only one had arrived after the Referendum and the majority had been in Belgium for more than 12 years. EU27 citizens in the UK were resident from one to 28 years, six had arrived after the Referendum, and the majority had less than nine years of residence.

In all the interviews I have started asking the interviewees to talk about their memories of the day after the Brexit Referendum, passing then to ask about the impact and expected future impact of Brexit on their life, about their plans (or lack thereof) for naturalisation, about the possibility of future mobility to another country and about their opinions about the process of negotiation between the UK government and the EU institutions. Except in the interviews with UK citizens in the UK, I have also asked about the pre-Referendum migratory experience. In particular, I have explored whether interviewees experienced bureaucratic problems in their past. I conducted most interviews in person, with some interviews by voice over IP or phone when the interviewee expressed this preference, and all interviews but two were recorded. The interviews took place in English, Italian, French or Bosnian-Croatian-Montenegrin-Serbian, according to the interviewee's preference. All names used are pseudonyms. Each interview has been first analysed individually through a biographic approach. I then compared systematically across the interviews the passages relating to naturalisation, either as answers to an explicit question or emerging from other themes. I firstly identified recurring themes, then single occurrences of a theme that added a further dimension to the analysis. I finally examined which major characteristics of different interviewees (e.g. class, gender, age) could or could not account for the different orientations.

UK citizens: Multiple tactics to remain EU citizens

Most of the UK citizens I have interviewed in Belgium and the UK had either applied for naturalisation or explored the procedure. The plans involved the citizenships of different EU member states, were in some, but not all cases, accelerated by the Referendum, were often driven by family reasons, and had the safeguard of EU citizenship as overarching aim. The reasons of the interviewees for applying were mostly linked to safeguarding their right to reside and work (for the interviewees in Belgium) and safeguarding the rights of movement within the EU (for all interviewees). The only interviewee forced to choose tactical non-citizenship (Pan 2020) was William, who had children enrolled in a British school in Belgium and, unable to afford the fees for children of those without expat status, was consciously delaying the application for Belgian citizenship for some years until the graduation of his youngest daughter.

In the other cases, one might expect that the natural choice for those residing in Belgium would be applying for Belgian nationality, but a number of interviewees had different options, such as Walter:

Soon after that [the Referendum] I started making enquiries about taking out the citizenship of another EU member state. I looked at two possibilities, and possibly three. One was for Italy, another was for Belgium, and another was for Germany. Germany, I dismissed because I haven't lived there for a long time, Italy I dismissed because it was more bureaucratic and more expensive than becoming Belgian. And so I opted for Belgium, having been living in Belgium since 1980. [Walter]

In addition to Belgian citizenship on the basis of residence, Walter could apply for Italian citizenship on the basis of marriage to an Italian, or for German citizenship on the basis of having been a civil servant in Germany. While he had qualified for several years for each of the three citizenships, he concretely explored the possibility only in the post-Referendum period. His choice of Belgian citizenship seems linked to both convenience (the Italian naturalisation procedure is considered cumbersome) and the long residence in Belgium. Other interviewees had a choice between Irish and Belgian citizenships, including Sarah and Nilay:

I've made the conscious choice to go down the easiest route [getting an Irish passport], because of course if you want to become Belgian you've got to do a language test, you've got to do this, you've got to do that. Whereas I had to go to Ireland, get my father's [birth certificate]

[...]

Now, because I own property here [in Belgium], because I have a permanent job here, because I've been paying taxes regularly here for the last X number of years, I could have become Belgian. But I have the opportunity to become Irish, I have the paperwork to become Irish, I probably feel more Irish than Belgian. [Sarah]

I thought obviously of applying for Belgian nationality, because I am entitled to, and I do fulfil all the requirements without any problems. I mean, obviously, they still have to accept my application, but generally speaking there would've been no problems with my receiving the Belgian nationality. [...]

Because of my Irish roots, I thought 'I will explore that path first', and, lo and behold, I was able to just get a passport. [Nilay]

During the post-Referendum exploration, Nilay discovered that, as a daughter of an Irish citizen, she was considered a citizen of Ireland at birth without the need to apply or register for the citizenship, and could simply apply for an Irish passport. In Sarah's case, as her parents had passed away, there were more complications, but obtaining a passport was not difficult. William had actually also explored becoming Irish on the basis of his mother's entitlement to an Irish passport, but as his mother was not registered as Irish before his birth, he did not qualify. Both Sarah's and Nilay's choice of applying for an Irish passport rather than for Belgian nationality seems to combine identity reasons ('Irish roots') with expediency. The Irish option was followed also by two of the British interviewees in the UK, who were also of Irish ancestry and saw in the acquisition of an Irish passport a safeguard for the future and, above all, their children's mobility chances (or motility; see Kaufmann et. al. 2004).

I actually feel very at home here [in Scotland], and I am very much settled, and I would like to stay here. I just want the option of going [to an EU27 country] if we need to. Well, it's just for our children. One of the things I have been talking to my siblings about is that we want them to have the chance to travel the way we've been used to. Things like the Erasmus programme, going to the university in the EU... [Vanessa]

Another interviewee in Belgium who had applied for a non-Belgian EU citizenship was Trevor, who had obtained French citizenship on the basis of marriage to a French woman, also considering to potentially retire to France in the future. In some cases in the UK, the EU27 partner was more interested in the British partner obtaining an EU27 citizenship, as was the case of Bruno and Leila, a couple with Italian and UK citizenship, respectively, whom I interviewed together. Bruno showed more interest in Leila obtaining Italian citizenship through marriage, while Leila, although open to the possibility, was less interested and more put off by the length of Italy's naturalisation procedures. Susanne, an Austrian citizen, also explored the possibility of her British husband obtaining German citizenship by descent, against his scepticism about the usefulness of an EU27 citizenship. Despite having a German mother, the partner did not qualify, as he was born when German law still did not allow women to transmit citizenship to their children.

Most of the interviewees in Belgium felt the need to explore naturalisation only with the Referendum, in some cases with a certain urgency:

As soon as the Referendum came in as 'Leave', it was like 'well, then we can't be British anymore, we have to take dual nationality'. So, although it took a while to sort it out, it was immediately in our [her and her husband's] heads. [Judy]

In other cases, the decision to explore naturalisation came only later, with the development of the Brexit process. For example, William started exploring Irish citizenship only with the stalemate in the UK Parliament. Nicholas was the only interviewee who had started planning to become Belgian

with the Conservative victory in the 2015 UK elections, anticipating that it could bring about Brexit, while Pauline accelerated long-standing reflections on whether to naturalise after the Referendum.

I knew that Belgian citizenship was a possible option, I had thought about it very vaguely in the past, I did even once, in the local council office, asked about it [...] but I gave up. But I had already at that point lived more of my life in Belgium than I had spent of my life in the UK [...] So, it wasn't an opportunistic thing from my point of view, I did identify strongly with Belgium. [Pauline]

Among the interviewees who applied for Belgian citizenship, the presence of children who had lived most of their lives in Belgium was an important factor, confirming, as in the case of those who applied for Irish citizenship from the UK, an intergenerational approach to naturalisation (Street 2014). In one case, the naturalisation plan was also linked to doubts about the future of dual citizenship. Rhys's daughter could apply on her own at 18, as she was born in Belgium, but he was still applying himself to transfer the citizenship earlier:

That's one of the reasons I'm applying for citizenship, so that the kids have the opportunity of working in Europe... 'cause they currently offer dual citizenship, who knows in 14 years' time, when it comes to our daughter to do it, who knows if that still will be feasible, but at the moment the dual citizenship is certainly a no-brainer. [Rhys]

One interviewee in Belgium, Beverley, did not see any good options for herself and her husband. British, with a Spanish husband, she did not have access to Spanish citizenship without living there for a period, something that she saw as impossible with children enrolled in a Belgian school. Moreover, she saw difficulties in obtaining Belgian nationality because, for part of the time spent in Belgium, she was a posted worker, something that she feared could make it difficult to fulfil the economic integration requirement for Belgian nationality. Finally, she was worried about the

possible condition for regrouping an EU27 spouse in the UK, if the restrictive condition for third-country spouses were to be extended to EU citizens after Brexit.

While most of the literature on external citizenship has focused on citizenship by ancestry, and on how more or less expansive norms of citizenship attribution can change the strategic advantage of having a specific ancestry, external citizenship by marriage has attracted less interest. For many of my interviewees in ‘mixed’ couples, the possibility of obtaining citizenship by marriage without residence emerges as a key factor that makes the difference between an easy answer to Brexit and a tactic that can be rather difficult to pursue.

More generally, the British interviewees showed varying levels of attachment and identification with the citizenship they have acquired or would like to acquire, but all of them see the EU dimension as central. Comparing Walter and Kelly, who have both obtained Belgian citizenship, shows the different feelings that can be linked to naturalisation. Walter underlined his decades of residence in Belgium and involvement with Belgian institutions to present his becoming Belgian as obvious, while Kelly showed hesitation in exercising her political rights in Belgium and a vague guilt about a relatively ‘instrumental’ naturalisation. However, both saw the naturalisation as above all safeguarding their EU citizenship, an approach that all the British interviewees shared. While the ‘EU premium’, the specific EU rights linked to citizenships of EU member states, has already been explored in a number of works (e.g. Harpaz 2015, Urzi and Williams 2017), it is of interest how explicit the interviewees were about this dimension, in a context in which EU citizenship loses some relevance for EU27 citizens in the UK.

EU27 citizens: Complex choices on whether to become British

The EU27 interviewees had a somewhat different orientation towards naturalisation than that of the UK citizens. Doubts about the desirability of permanence in the UK, together with obstacles to

naturalisation, meant that while some accelerated naturalisation because of Brexit, others were waiting to figure out the developments of Brexit, refused to engage with naturalisation, or felt unable to start the procedure despite thinking they needed to. Some of the interviewees, recently arrived in the UK and years away from qualifying for citizenship, as well as others who had a precarious migratory plan, felt that they could not make any plans about citizenship². Beyond these cases, there was some ambivalence about UK citizenship. Obtaining UK citizenship could alleviate some of the fears of EU27 interviewees, such as the right to reside and work (and rent) and continued mobility between the UK and the EU. Other fears, including the rise of xenophobia and the fear of an economic crisis, made UK citizenship less attractive and opened the possibility of leaving the UK (Sredanovic 2020a). Moreover, the Brexit process left many feeling less welcome and identifying less with British society. This disaffection towards the UK happened also to some UK citizens, but it was not an obstacle in deciding to apply for another citizenship. Since 2019, EU27 citizens have also had access to a specific application procedure to confirm their rights to stay in the UK, the 'settled status'. Strong criticism has been directed towards the settled status, linked to the fact that it is an application that can be refused, rather than a registration, and to the online-only nature of the procedure. At the same time the settled status establishes an intermediate status that might content some EU27 citizens, rather than also applying for citizenship. The settled status has also reduced the value of the previous intermediate status, the permanent residence, as even EU27 citizens with permanent residence are required to apply for settled status to maintain their rights.

Finally, the UK fee for naturalisation is rather steep, compared to Belgium's (indeed, compared to most EU member states'). At 1330 pounds versus 150 euros, the cost could be enough to dissuade from or impede naturalisation, while in Belgium, the fee itself is rarely a problem.

The majority of EU member states tolerate dual citizenship and the cases in which EU27 citizens in the UK cannot maintain their citizenship of origin have not attracted much attention in the literature (but see Klimavičiūtė et al. 2020 on the case of Lithuanians). Among my interviewees, only Susanne, an Austrian, was not eligible for dual citizenship, which made her exclude the idea of

applying for the UK's. However, Germany tolerates dual citizenship only in some cases, including with other EU member states. Anke, whom I interviewed in February 2019, was basically waiting for a decision on how dual citizenship would be dealt with post-Brexit, to decide whether to apply (the German government decided to continue tolerating it for pre-Brexit applicants in April 2019). Some interviewees who *were* entitled to dual citizenship also emphasised that they would never have given up the citizenship of origin.

In addition to the 'ordinary' factors in deciding whether to naturalise, the Brexit context meant that the EU27 interviewees had two lines of further uncertainty. The main question was whether Brexit and the loss of rights were certain enough to justify applying for UK citizenship; the second was whether the conditions in the UK post-Brexit would be such to justify remaining in the country. A few interviewees were not worried at all about Brexit, either because they did not think it could change their situation in the UK or, in the case of Nicola, a Eurosceptic interviewee, because he saw more problems in remaining within the EU (nevertheless, Nicola was planning to apply for citizenship). At the other end of the continuum were situations such as Krisztina's, who considered unthinkable not naturalising in the context of Brexit:

I was too scared not to go for it [the citizenship application], if that makes sense. And I really fear for all my friends who for whatever reason, whether they are Slovakian, and they can't actually, and they don't want to renounce their citizenship back there.

[...]

I did not know what... we still don't know what will happen to people. And I don't trust the British government to any degree. [Krisztina]

The lack of trust in the UK government in Krisztina's case extended to refusing categorically the settled status as a valid alternative to citizenship:

I understand that they will introduce now this kind of, whatever they call it right now, registration [the settled status]. There will be a couple of tiers, there will be people who went for citizenship, and they are fine, there will be people who only have that [the settled status], and there will be the people who come afterwards. And that's... you know, I don't trust them, with anything. [Krisztina]

Like Krisztina, most of the interviewees who decided to apply for naturalisation had done so after seeing the result of the Referendum, although some started to worry about Brexit only later during the negotiation, and one interviewee, Chiara, had naturalised in 2013, feeling already then an increase in xenophobia. As with some British interviewees, in Wioletta's case, the Referendum result accelerated previous measures taken to naturalise that started in 2014:

I started thinking about getting the citizenship, I didn't feel the urgent need. [...] I had [...] the book, *Life in the UK*, at home, which I read at some point, but I don't remember exactly now when it was, and I left the book, and I forgot about everything else in the book. And after finding out the results of the Referendum I thought 'OK, now I feel like I seriously have to stop thinking about it'. So, I started applying... [Wioletta]

More than the British interviewees, some of the EU27 citizens who applied for naturalisation (or permanent residence) felt particularly anxious about the outcome of the application, fearing that slight errors in the form or a discretionary decision could mean rejection.

The steep UK naturalisation fee was a problem for some interviewees, an onerous expense for some who naturalised, to the extent that one interviewee, Agata, turned to crowdfunding to find the fee. For a number of interviewees, it was also a reason to apply only for permanent residence or settled status, to postpone the naturalisation application to see how Brexit would develop, or to avoid naturalisation in general (class did not seem the main factor in these cases, as some of these interviewees defined themselves as relatively wealthy). In the interview with José, the fee emerges as the first factor, followed by identity reasons:

I've been here for a long time, you do wonder about if there might be any kind of benefit to doing that. [naturalising] [...] I guess that for me there are a number of reasons for ending up not doing it. First of all the cost, I mean, it's ludicrous, I'm not going to pay that amount of money for something like that, absolutely. No way. I mean, I think that the fees are exorbitant, and they are, by comparative standards. Second, you know, for me it would be barely a purely practical decision. It's not like I feel British, I don't feel British, I'm Spanish, and that's my heart. But you know, of course I have been here for a long time, of course I feel somehow close to the country, and I like a lot of this country, and, you know, in that context having that second citizenship, you know, is something that, yeah, it could have been convenient. [José]

José went on explaining that at first, thinking that he would have to renounce his Spanish citizenship was the main obstacle to naturalising. Once he understood that he would have been able to maintain the dual citizenship, the remaining obstacles were still too significant for a status that he saw as useful only in terms of the ability to vote in national elections (he had been very politically active until a few years before the interview). While José's attitudes towards citizenship before the start of the Brexit process fit somehow within the post-nationalist (e.g. Soysal 1994) ideas about citizenship, he recognised that post-Brexit the situation could be quite different:

... post-Brexit is a different game, right? Maybe, you know, if I were to stay here and [...] if that life with the settled status creates inconveniences, I might yet think about going for the full [citizenship].
But at the moment, you know, I don't even know whether I will be here next year. [José]

While citizenship was an open option for José to pursue if the settled status did not avoid significant inconveniences in post-Brexit Britain, the more general indeterminacy of his future (he was exploring the possibility of returning to Spain, where he had started a new romantic relationship) left the citizenship issue to be decided upon at a later date.

José was also not the only one to wait for Brexit to develop further before deciding whether to naturalise. Aleksandra applied for permanent residence and decided to marry her long-term British partner in answer to Brexit, but refused to apply for citizenship unless the situation would get worse with Brexit:

I am just pissed off. Yeah, I do feel safe enough [with the permanent residence] I suppose. And I know that I could easily apply for citizenship, if I need to. So, until I really need to, unless the situation changes, and I feel I really need to, I am not giving them any more of my money, and any more of my time. [Aleksandra]

Aleksandra was both quite settled in the country, having spent more than ten years there, and said that she was not planning to remain in the UK in the medium term. Claudia, who was settled in the UK, was waiting for the situation, and, in particular, the economy, to become clearer before deciding whether to link herself legally to the UK:

I will surely do the settled status, then, for the permanent residence I do not know, because to be honest I wouldn't want to link myself too much to a country in which I do not know how things will end [Claudia]

Especially in the interviews conducted close to March 29, 2019 (the date initially planned for Brexit), the possibility of the UK leaving the EU without a deal regulating the future relationship, several plans were left on hold, as in the case of Guacimara and Fernando, who were waiting to decide whether to register their British-born daughters for UK citizenship.

Guacimara: We just became permanent residents, now, in December, and now we can pay 1000 pounds each, and they [the daughters] can get their British passport, but we want to see what happens

with Brexit, deal or no deal, because maybe we need the money for [something else]. [...] we can apply for that [the citizenship of the daughters] if we get a deal, or no Brexit at all.

Fernando: Yeah, because if there is no [deal] we're even considering going back to Spain. Quitting jobs and just going back.

With the fear of a no-deal Brexit breaking down the supply of essential merchandise to the UK and, in the case of Guacimara and Fernando, a fear of many medical professionals quitting the country, the couple was waiting to see whether to spend the fee on their daughters' citizenship or to keep the money to move back to Spain. Different from other interviewees, Guacimara and Fernando were mostly worried about the no-deal Brexit, and they were otherwise hurrying to obtain citizenship for the children and themselves, to feel more secure and access political rights, but the negotiation process kept them uncertain.

In some cases, the indeterminacy was not limited to waiting for Brexit to develop more clearly. In the case of Isabelle, there was a feeling that she *had* to apply and, at the same time, a refusal to engage with the procedure:

...several years need to pass before that something happens [before she satisfies the requirements for permanent residence or naturalisation], and also, to be honest, I don't necessarily want to start procedures. [...] There is so much, so much incertitude, that I say to myself, 'I will wait, and we will see'. But in fact, it is a bit paradoxical, because I want to stay, I know that I will have to do some administrative procedures, such as renewing the residence or the settled status. I want to do something, but at the same time, I feel that it's true... that I will be forced. Or even make a nationality application later, but it is forced this way. [...] It's difficult, this change, because it's clear that one arrived in Great Britain, it was open, we were treated as Britons, and then one has to do, to battle, to make applications, to make procedures... [Isabelle]

As the interview was conducted before the settled-status procedure was open to the general public, and she had arrived in the UK less than five years before, all the procedures mentioned by Isabelle were more or less distant in the future. However, her interview shows an indeterminacy that is not linked to whether she might leave the country or to what Brexit will mean for her. She knew she would need to apply for some kind of status, but could not think of doing so while feeling she was being forced by a loss of rights and status.

Conclusions

In these pages, I have shown different cases of uncertainties and partial tactics linked to naturalisation, in the context of Brexit. In particular, I have shown how Britons in Belgium and the UK explore different possibilities for maintaining their EU citizenship rights, and the different ways that EU27 citizens try to figure out if Brexit makes it necessary and worthwhile to apply for UK citizenship.

Brexit shows the importance of protective naturalisation in response to legal measures and a political climate, and, more generally, the importance of conceptualising naturalisation as temporally variable and linked to specific events. For most of the interviewees, it was only Brexit (in most cases the Referendum result, but for a few, the earlier or later developments of the process) that brought them to consider naturalising. For some, the decision was rather brusque, as in the cases of Judy and Krisztina, but others hesitated on the decision for a time, waiting to see how Brexit would develop, and, in some cases (Pauline, Wioletta), Brexit accelerated existing plans for naturalisation.

Some of the uncertainties presented here are specific to Brexit. While a major collective loss of rights is not so rare for migrants, the categorical nature of Brexit and the fact that whole categories, those linked to EU citizenship, could potentially be abolished, make Brexit more exceptional.

Moreover, at least for the migrants from the pre-2004 enlargement member states, Brexit often represents the first challenge to their freedom of movement.

However, naturalisation decisions can also be temporally dependent and conducted in a context of uncertainty outside of major crises. In light of recent work on how the phases of one's biography influence migration decisions (e.g. Ryan 2018), it would be interesting to explore how naturalisation decisions are linked to biographical events. The degree to which the outcome of a naturalisation application can be anticipated is limited by discretionary powers, variation in implementation (Sredanovic 2020b), legislative change and changes in the interpretation of the law.³ Some studies show how the *process* of naturalisation itself is charged with complexity and ambivalence, linked to the symbolic values inscribed in the requirements and procedures (e.g. Byrne 2014, Fortier 2017, Bassel et al. 2018). While my interviewees have often displayed a good knowledge of the conditions of naturalisation and a capacity to make informed choices, I have shown how difficult it is to reduce naturalisation to a simple calculated choice. Most decisional processes were characterised by difficulty and uncertainties and, in some cases, a refusal to engage with the process (Aleksandra), even if the interviewee knew she would have needed to do so (Isabelle).

Returning to the question of how much naturalisation is a matter of tactics and how much it is a matter of strategy, the few interviewees who could choose among different naturalisation options had some space for a strategy; they could avoid applying for the citizenship of a country that establishes particularly difficult conditions and procedures for naturalisation. Those who have the resources for citizenship by investment, and for the services of a specialised agency (Surak 2020) probably have an even larger space for strategy. More generally speaking, one could consider as strategic the cases in which the conditions and the consequences of naturalisation are relatively stable and known, and those in which the potential candidate can avoid the worst requirements by applying for another citizenship. On the contrary, when the context and the procedures are unstable and uncertain, and there are no external alternatives, the decision could be considered more tactical.

The latter was the case with most of my interviewees, given also the specific uncertainties linked to Brexit. Moreover, this is also probably the case for most of those who qualify for naturalisation. While uncertain situations like the one Brexit created are the exception rather than the norm, there are often other sources of uncertainties, and probably only a minority of those with the opportunity to naturalise have more than one possible citizenship for which they could apply.

Considering how naturalisation could be decided upon following specific events, or, more generally, without the possibility of elaborating a definite strategy, invites us to reconsider the way in which we model the naturalisation decision. Modelling naturalisation as a purely economic decision, including the ‘capital accumulation’ description of flexible citizenship (Ong 1993), might overestimate the capacity of migrants to control and anticipate their losses and gains. Also, modelling naturalisation as a simple result of the degree of integration might not capture the degree to which naturalisation is, in most cases, a complex, contingent and tactical decision.

¹ De Certeau’s theoretical approach has been largely used to show how many among the everyday choices are tactical rather than strategic, including in the field of migration studies (see e.g. Lulle et al. 2018; Kahveci et al. 2020). The fact that most of my interviewees can be considered to have been tactical when deciding whether to naturalise is therefore hardly surprising. However, underlining the tactical nature of most naturalisations can help to correct the degree to which theoretical models of naturalisation continue to rely on simplified assumptions about rationality and decisional processes.

² Beyond these cases, there was no clear link between length of residence and naturalisation intentions: those with less time in the UK were in some cases unwilling to reinforce their links with the country, but the interviewees who had taken the most concrete steps to leave the country had all more than 15 years in the country. Similarly, some of those with the longest residence in the UK were among those refusing explicitly to engage with the naturalisation process. Among the Britons in Belgium the only interviewees not to plan a naturalisation were a couple resident in Belgium since the early 1990s, who felt they were reasonably safeguarded by their length of residence.

³ I thank Patrick Wautelet for calling my attention to this latter point.

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