



Citizenship: tool or reward?

The role of citizenship policy in the process of integration

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policy network paper



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Abstract

This paper offers a critical analysis of the tendency observable in a number of European countries to introduce stricter naturalisation requirements, including language tests and examinations on the history, constitution and so-called “public values” of those states. Focusing on the case of Britain, the paper argues that, if what we want is to create an integrated society with an inclusive political culture, these policy changes are unlikely to work. The paper advances a conceptual model for understanding the relationship between citizenship and integration, where citizenship is either conceived as a “tool” facilitating the integration of multi-ethnic societies, or as a “reward” to be handed to immigrants that have successfully “completed” the integration process. The example of Estonia, which has explicitly pursued the “reward” model, is used to highlight the dangers of this approach. Instead, the governments of multi-ethnic societies should opt for the “tool” approach to citizenship, which prioritises the role of equality and participation rather than language and identity in the integration process.

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1	Introduction	4
2	Thematic remarks on citizenship and integration	6
3	Citizenship and integration in Britain	8
4	The value of international comparison	12
5	Drawing lessons from Estonia	14
6	Findings and recommendations	16
	References	20

1 Introduction

Since the late 1990s and especially since the events of 9/11, the acquisition of citizenship has become more difficult for immigrants living on a permanent basis in a number of European states. Governments in the Netherlands, Denmark and Germany have introduced stricter naturalisation requirements, including more stringent language tests and additional examinations on the history, constitution and so-called “public values” of their states. This trend is also visible in Britain, where citizenship policy is being transformed as part of a broader set of policy changes based on a widespread perception that previous “multicultural” approaches to integration have failed. Evidence of residential segregation and social and economic disadvantage among certain groups in Britain, especially non-European and Muslim groups, is being blamed on the “excessive tolerance” for cultural differences that characterised earlier policies.¹ In 2002, after decades of boasting one of Europe’s most liberal citizenship policies, the British government introduced new legislation requiring citizenship applicants to pass an English language test and a test on “knowledge of life in the UK”. More recently, the government has announced proposals to reform Britain’s citizenship rules in line with a new concept of “earned citizenship”, which, if accepted, would see the introduction of further integration requirements ahead of citizenship. British and other European governments seem to think that by moving concerns about language and identity to the centre of debates about citizenship and immigration they will succeed in transforming their populations of immigrant origin into more integrated and loyal citizens.

This paper assesses the effectiveness of the changes that are being made to citizenship policy in Britain by taking a closer look at the relationship between citizenship and integration. More specifically, it examines the role that language and identity – as opposed to other factors associated with citizenship such as equality and participation – play in the success of the integration process.

Naturalisation remains the most potent measure of integration for immigrants

Focusing on Britain, but drawing implications for all European states, the paper argues that the government is right to raise the status of becoming a British citizen, for naturalisation remains the most potent measure of integration for immigrants in a receiving society. However, the paper also argues that the recent policy changes reveal a lack of understanding, or at least confusion, on the part of the government about the dynamics of the citizenship process and its implications for the integration of culturally diverse societies. Much more will be said about the government’s confusion in this paper. By way of introduction, it is sufficient to recall the proposal made by the government last summer to withdraw the system of universal free English language tuition for immigrants (a proposal that was later reversed). An enigmatic proposal for a government bent on arguing that lack of English language skills is the biggest barrier to integration for immigrant communities.²

The government’s recent publication of a green paper, *The Path to Citizenship*, initiating a three-month consultation process on its most recent citizenship proposals, therefore comes at a critical moment.³ Coinciding with the Citizenship Review initiated by Lord Goldsmith QC last summer, due to report to the government in March 2008,⁴ the government’s consultation process provides a welcome opportunity to engage in the type of sustained thinking about the role of citizenship in the integration process that policymakers have so far failed to do. It is hoped that the insights of this paper will be useful not only to the British government but also to policymakers in other European states as they struggle to redefine their citizenship policies.

1. Trevor Phillips, former chair of the Commission for Racial Equality and current chair of the for Equality and Human Rights Commission, has spoken about Britain as “sleepwalking to segregation” as a result of the way that multicultural policies have been implemented (Gillan 2005). Concern about multiculturalism and its tendency to “exacerbate divisions” has in turn informed the government’s decision to emphasise “community cohesion” as the new platform of its integration policies (Kelly 2006).

2. Migrants language lessons rethink, BBC News [online], 1 January 2008. Available at: <http://news.bbc.co.uk/1/hi/education/7170125.stm> [accessed 3 February 2008].

3. Home Office 2008, *The path to citizenship: next steps in reforming the immigration system*, London, Border and Immigration Agency Communications Directorate.

4. See the official website of Lord Goldsmith QC’s citizenship review, available at <http://www.justice.gov.uk/reviews/citizenship.htm>

The first part of the paper offers some general remarks on the relationship between citizenship and integration. It suggests that this relationship can be usefully conceived in terms of a two-fold metaphor where citizenship is understood either as a tool facilitating the integration of multi-ethnic societies, or as a reward to be handed to immigrants that have successfully “completed” the integration process. The second part of the paper examines the British case. It argues that, possibly owing to the origins of the concept of “British citizenship” in Britain’s imperial past, successive British governments have failed to develop a clear conception of the relationship between citizenship and integration. This failure, which the paper argues continues to characterise British policy-making, means that citizenship, as a legal status and as a policy, has to this day played a negligible role in efforts to integrate Britain’s multi-ethnic society. While welcome in providing a clearer articulation of the importance of citizenship, recent amendments to British citizenship policy, including the government’s current green paper, continue to draw confusingly on both models of citizenship as a “tool” and as a “reward”, although there is an increasing tendency to emphasise the latter approach.

The third part of the paper explains why it is valuable to analyse the citizenship policies of other European states in order to assess the merits of the British approach, notwithstanding each country’s particular national historical trajectory. The fourth part highlights the potential dangers of the “reward approach” to citizenship by reviewing the recent experience of one European country—Estonia—that has explicitly pursued policies based on this model, policies which have only served to create greater disaffection among the country’s ethnic Russian minority. The final part of the paper identifies a series of recommendations for British (and other European) policymakers that flow from this analysis, making a clear case in favour of adopting a model of citizenship as a “tool” for integration.

2 Thematic remarks on citizenship and integration

Before moving on to the empirical discussion, some general remarks on the relationship between citizenship and integration are in order. Integration can be defined, in the most general sense, as the process of ensuring the full participation of an individual in a society's economic, social, cultural and political life. The terms of integration vary from one state to another however, as each state embarks on its own process of negotiating the adjustments that newcomers and native-born residents should make in order to ensure that minority and majority groups are able to participate in shaping society on equal terms. Where newcomers are expected to do all or most of the adjusting, the integration model can be described as "assimilationist". On the opposite extreme, where native-born residents (their practices and institutions) are called on to make adjustments as well, the model of integration can be described as multicultural. All models of integration—wherever they are located on the multiculturalism versus assimilation spectrum—depict the acquisition of citizenship as a crucial step for individuals who enter and wish to be integrated in a society. Although there is a trend in international law to provide permanently residing non-citizens with an ever greater number of socio-economic and cultural rights, the citizens of a state continue to remain privileged in having exclusive access to an important set of political rights.⁵ Only the citizens of a state have the right to stand for local, parliamentary or presidential elections, and the right to vote in parliamentary elections (and in some countries, in local elections as well). Whatever other rights non-citizens may enjoy, therefore, without access to citizenship they will remain excluded from the democratic process.

Where the different models of integration diverge is in the role that they ascribe to citizenship within the integration process. In the assimilationist model, citizenship is viewed as the "reward" to be handed to individuals who have proven their loyalty to the state, often by renouncing their previous "national identity". Individuals can acquire the citizenship of a state only when they are understood to have "completed" or are close to "completing" the integration process. States that subscribe to this view will generally demand that immigrants pass arduous naturalisation tests, including high levels of proficiency in the dominant language, knowledge of a state's history and/or constitutional system and subscribing to the "public values" of a state. Access to dual nationality—the most visible way for immigrants to develop and maintain multiple identities—is normally restricted in these states, even if certain exceptions to this rule are often made. Austria's naturalisation criteria, which one study describes as the most onerous in Europe, illustrates this model well.⁶ Here, long-term residents of immigrant origin who wish to acquire Austrian citizenship are required to either pass a language certificate test or participate in a mandatory integration programme which consists of language and civic education courses (the cost of which must partly be borne by immigrants themselves). Failure to participate in the course can lead to non-renewal of the residence permit and even threat of expulsion. Immigrants who naturalise as Austrian citizens must renounce their previous nationality.

In the multicultural model, citizenship is understood as an important tool for integrating societies of heterogeneous origin rather than as a reward.⁷ According to this conception, the rights and responsibilities that come with citizenship are themselves a factor encouraging further integration. The acquisition of citizenship helps to shape individual loyalties, not in an exclusive way but by accepting the likelihood of multiple identities. In contrast to the assimilationist model, which considers proficiency in the dominant language and culture of a receiving state to be a "marker" of integration, the multicultural model assumes that immigrants will develop a sense of loyalty to the state not by absorbing

The rights and responsibilities that come with citizenship encourage integration

5. The exception of course is the case of EU nationals living in other EU member states, who also enjoy certain (but still limited) political rights in their host society.

6. See the Migrant Integration Policy Index developed by the Migration Policy Group and the British Council, available at: <http://www.integrationindex.eu/integrationindex/2291.html>.

7. Bauböck (2006) and Kymlicka (2003) both make a similar distinction between states that see citizenship as a tool and states that see citizenship as a reward for integration.

elements of the dominant culture, but rather by participating actively in a state's economic, cultural and political institutions. Since citizenship is a necessary (although not sufficient, as we shall see) pre-condition for immigrants to participate as equal members of a society, the naturalisation requirements of states that subscribe to this view will be limited to modest residency requirements and simple language tests, which immigrants can pass with little effort. Sweden's nationality legislation, considered among the most generous in Europe, is often identified as exemplifying this model. In order to naturalise as a Swedish citizen, immigrants need only fulfil a series of residence requirements; there are no language or other "integration" tests whatsoever. Sweden also accepts dual nationality for immigrants (Howard 2005).

3 Citizenship and integration in Britain

Looking back at the period between 1948, when the concept of citizenship developed in British law, and the present, one is struck by the failure of British policymakers to develop a clear conception of the relationship between citizenship and integration.⁸ Certainly, decisions concerning the scope and implications of citizenship have been and continue to be taken, as the government's current green paper illustrates, but the resulting policies have failed to follow any coherent approach. To the extent that the policy decisions have been articulated using the language of "citizenship as a tool" or "citizenship as a reward" for integration, this has been more by accident than by design.

At a first glance, the concept of citizenship in the British Nationality Act of 1948 appeared to articulate a model of citizenship as a tool binding together the Empire and Commonwealth. The act, which was adopted by the government of Clement Attlee in the closing days of the British Empire, brought into being two concepts: "citizenship of the United Kingdom and colonies" (CUCK), and "Commonwealth citizenship". Both types of citizenship, which were used interchangeably, were conferred indiscriminately to all British subjects living in the colonies and independent Commonwealth countries. By virtue of this act, CUCKs and Commonwealth citizens enjoyed full rights of entry in the UK. However, by the 1960s, as more than half a million non-white British subjects moved into the UK, British policymakers went back on this system and introduced a series of immigration controls, which put British nationals born in the Commonwealth (with certain exceptions) on the same legal footing as aliens—that is, facing quotas for entry and naturalisation criteria. By the 1960s, the concept of British citizenship had therefore become meaningless: it was neither a symbol of nationhood, covering as it did persons from across the multi-national Commonwealth; nor was it a status conferring any substantive equality in relation to the right to enter and settle in any particular part of British territory (Lester 2007).

The Nationality Act of 1981 went some way towards correcting this situation by finally defining "British citizenship" as excluding British nationals born in the colonies,⁹ thereby bringing the concept closer to the way that citizenship was understood by that time in other European states as signifying a "genuine link" between an individual and a state.¹⁰ The 1981 act also enshrined a generous set of naturalisation rules—at least relative to the rules that existed in other European countries—suggesting that Britain was developing a conception of citizenship as a tool for integration, based on facilitating access to citizenship for immigrant groups. First-generation immigrants wishing to apply for British citizenship needed only to live in the UK for five years, demonstrate nominal proficiency in the English language (to be verified by the applicant's affirmation rather than a test) and demonstrate "good character", which was interpreted as financial solvency, the absence of a significant criminal record and no attempt to provide false information in the naturalisation process. In contrast to the strict *ius sanguinis* (citizenship by descent) rules that operated in some European countries like Germany, the children and grandchildren of migrants born in the UK could become British citizens at birth or, depending on the status of their parents, through a simple process of registration. In addition, dual nationality was allowed, one of the earliest citizenship laws in Europe to do so (Hansen 2001, p. 81).

The fact that British citizenship was developing along the lines of a "tool" for integration also seemed to be reflected in the explicitly multicultural model of integration which was espoused by British policymakers at the time. This did not stress the acculturation of individuals but rather put the emphasis of integration on combating discrimination and the need to respect cultural differences (Bertossi 2007). Indeed, during the 1980s and 1990s, Britain developed some of Europe's most advanced provi-

8. Hansen (2000) and Karatani (2003) offer two excellent surveys of the evolution of British citizenship.

9. The latter were given one of two different statuses: British overseas citizenship, which was conferred to persons who, for various reasons, did not acquire the citizenship of the newly independent Commonwealth states where they lived, and British dependent territories citizenship conferred to residents of Britain's remaining dependent territories. Neither BOCs nor BDTs had the right to enter the UK. See Hansen (2001) for further details.

10. The notion of a "genuine link" between the state and an individual is the generally accepted criterion for the conferral of citizenship, following the International Court of Justice's famous *Nottebohm Case* of 1955. However, there is still no generally accepted definition of a "genuine link", although this is understood to be established by one or more of the following rules: parental descent, birth on the territory of a state, years of residence and/or knowledge of a state's official language. See Thiele (2005) for further details.

sions concerning non-discrimination and equality, including a Race Relations Act, which (in its 2000 amended form) can be considered a model for the rest of Europe, prohibiting direct and indirect discrimination on the grounds of race or ethnicity by both private and public bodies, and introducing an innovative system of positive duties which requires public authorities to actively promote race equality and good race relations (Fredman 2001, p.9-44).

However, a closer look at the experience of minority groups in Britain during these years indicates that, in practice, the laudable principles enshrined in British non-discrimination legislation have not been systematically applied. Although progress has been made in terms of reducing inequalities, persons belonging to certain minorities, especially persons of Bangladeshi, Pakistani and black African descent, continue to face greater difficulties in their access to employment than members of the majority population (Commission for Racial Equality 2007, p.18-25). The introduction of mandatory “equality schemes” by public authorities in Britain—with the aim of promoting race equality in all their recruitment and policy-making functions—has likewise only proceeded slowly and unevenly. Where equality schemes exist, they are often implemented by focusing on procedures rather than by identifying targets in order to achieve equality of outcomes. The result, according to the government’s own statistics, is that persons belonging to certain ethnic minorities are still more likely to experience sub-standard housing conditions and to suffer more serious health disorders than the rest of the population (Department for Communities and Local Government 2007, p.34, 43). In the sphere of criminal justice, persons belonging to certain minority groups, especially black and Asian groups, continue to be disproportionately targeted by police stop-and-search practices, adding to the general feelings of disaffection felt by these groups (Reza & Magill 2006).

A similar gulf between principles and reality characterises Britain’s citizenship policy. The rules established for British naturalisation in 1981 may have been comparatively lenient, and indeed, the rate of naturalisation in Britain was one of the highest in Europe, along with France (Hammar 1985, p.442). However, little was done during these years to encourage the active participation in British political life of the new cohorts of naturalised citizens. By the late 1990s and early part of this decade, a number of critical reports (Anwar 2001, p.533-9; Ali & O’Cinneide 2002) had been published indicating the poor levels of ethnic minority participation and mobilisation in British front-line politics. The same British governments that facilitated access to citizenship gave insufficient attention to the institutional and structural barriers that hindered the effective exercise of political citizenship rights by Britain’s minority ethnic populations. It is significant that the government has recently announced that it will examine this problem by commissioning a report which will look at whether introducing specific and time-limited positive action measures would be likely to achieve the desired outcome of more diverse ethnic representation within the elected community.¹¹ However, no specific measures to remedy the under-representation of minority ethnic groups in British politics have yet been adopted.

By the late 1990s, and especially after the events of 9/11 and subsequent terrorist attacks in several European countries, a consensus emerged in British policy-making circles about the need to reform Britain’s integration model. Residential segregation and social and economic disadvantage among minority ethnic groups was considered evidence of the “failure” of multicultural policies—even if, as we have seen, these policies were poorly implemented and cannot be described as “multicultural” in practice. The government’s response, however, has been ambiguous. On the one hand, it has introduced legislation and policies that comes closer to the “reward” model by placing concerns about language and identity at the centre of debates about citizenship. In 2002 a new Nationality, Immigration and Asylum Act was adopted which required citizenship applicants to pass an official language test or provide documentary evidence that they had achieved competence in English,

11. *Comments of the government of the United Kingdom on the opinion of the advisory committee on the implementation of the Framework Convention for the Protection of National Minorities in the United Kingdom*, received by the Council of Europe on 26 October 2007, GVT/COM/II(2007)003, p.31.

Welsh or Scottish Gaelic at ESOL (English for speakers of other languages) entry three level, where necessary by enrolling in specially designed language courses. Applicants must now also pass a new test on “knowledge of life in the UK”, consisting of 24 multiple-choice questions including, among other things, questions about “British” customs and traditions.

The government’s most recent reform proposals point even further in the direction of the “reward” approach. This is first of all discernable in the language of the green paper, which refers to putting would-be citizens “on probation” to ensure that they have “earned” their right to full British citizenship. The “reward” approach is also evident in the green paper’s proposal to introduce further integration requirements for citizenship, including the need for immigrants to pass English language tests at an earlier stage in the application process, to be economically self-sufficient, and to play an active part in their local community, which the green paper refers to as demonstrating “active citizenship”, a phrase that was coined by the European Commission with a rather different meaning, as will be explained later in this paper. The proposed introduction of a multi-speed naturalisation system, in which immigrants who undertake voluntary work speed up their progress, while those convicted of minor offences will have their applications delayed, is still further in line with the “reward” approach.

In other ways, however, British policymakers continue to emphasise the importance of citizenship as a “tool” for integration. The same 2002 act that introduced the citizenship tests brought into being new citizenship ceremonies which, in the

The government’s green paper points even further in the direction of the “reward” approach

words of one expert, were intended to give “added significance to attaining citizenship [by] providing an occasion at which the applicant, their family and close friends could celebrate a life-defining moment” (Rimmer 2007, p.3). Organised by local councils, the citizenship ceremonies, if properly conducted, can provide the first, symbolic step for naturalised citizens to participate in public life at local level. The decision in 2002 to introduce citizenship education as a compulsory subject within the national curriculum also appears to emphasise the value of citizenship as a tool for integration. By covering issues of identity and diversity alongside the workings of government, elections and the rule of law, citizenship education, if properly implemented, is designed to empower minority ethnic school children while raising awareness among all students of the rich diversity of British society.

Even the government’s current green paper, which in most respects seems to drive British policy and discourse closer to the “reward” model, refers to citizenship in a number of places as an important tool for integration. Indeed, one of the green paper’s more controversial proposals—to delay access to benefits and council housing for immigrants until they have completed their probationary period—is justified by the authors of the green paper in terms of providing more “incentives” for people to take up citizenship “so that they can become fully integrated into our society”. This positive message about the role of citizenship in the integration process does not fit easily with the main thrust of the green paper, which aims to increase the number of hoops that immigrants should jump through in order to become full British citizens.

Since 2002, therefore, the initiatives taken in relation to citizenship appear to be following two competing impulses. On the one hand, the government is using the language of “citizenship as a tool” for integration: the measures, we are told, are not intended to exclude immigrants from participating in the country’s economic, social, cultural and political life but rather to provide more incentives for immigrants to progress to British citizenship. On the other hand, by making competence in the dominant language, knowledge of the “British way of life” and, following the latest proposals, even “active citizenship” a pre-condition for obtaining citizenship, the new measures seek to ensure that

immigrants have achieved a considerable degree of integration before they are awarded citizenship.

Regardless of these conflicting policies, the tightening of Britain's naturalisation rules indicates that there is, at minimum, a temptation among British policymakers to opt for a conception of citizenship as a reward. If this is the route that British policymakers end up pursuing they will be following a trend that is visible in several other European countries (Odmalm 2007, p.29). The Netherlands, which was a front-runner in introducing "citizenship trajectory" schemes in the mid-1990s, has recently toughened the content of these schemes considerably. Foreign nationals who wish to re-unite with a spouse in the Netherlands now have to pass a citizenship exam (including a Dutch language test) in their countries of origin. Belgium and Germany have recently introduced their own "integration courses" modeled explicitly on the Dutch example (Jacobs & Rea 2007, p.2). These changes have led Joppke and Morawska (2003) to talk about "a renewed emphasis on assimilation" across Europe as a whole. In view of these tendencies, the following section will analyse the case of one country, Estonia, which for many years advanced a citizenship policy based purely on the idea of "rewarding" immigrants for becoming proficient in the Estonian language—an approach that, I argue, not only failed to reach its proclaimed objectives but also had negative long-term consequences for inter-ethnic relations.

4 The value of international comparison

It was Brubaker (1992) who first alerted us to the difficulties of making cross-national comparisons in the field of citizenship, pointing out that citizenship policy is a reflection of deep-rooted historical national traditions which vary fundamentally from state to state. Comparisons between “western” and “eastern” European citizenship policies are likely to meet with even more resistance: the sceptic would argue that citizenship problems in eastern Europe are often the result of large-scale violent transformations, resulting in border changes or mass involuntary population transfers which left large numbers of individuals stateless or constituting “national minorities” within newly configured states. This is certainly the case in Estonia, which acquired a large population of ethnic Russians when it proclaimed independence from the Soviet Union in 1991. The sudden and forcible manner in which ethnic Russians in Estonia – and other ethnic groups elsewhere in the former Soviet bloc – became minorities is widely considered to render more legitimate their claims for recognition and assistance in preserving their distinct cultures. In contrast, citizenship problems in western Europe are typically associated with individuals who have knowingly and voluntarily moved across borders, and who therefore can be held more responsible (the argument goes) for making the necessary adjustments.

This paper does not deny the different national historical trajectories that have shaped the citizenship policies of each European country. Indeed, these differences explain why, in contrast to other aspects of minority policy, including access

by persons belonging to minorities to education in their mother tongue, efforts to reach common European standards in relation to citizenship criteria have progressed slowly and with difficulty. Nevertheless, in the 1990s, as migration flows into Europe increased and as migrants began settling permanently in their “host” societies, European governments began to acknowledge the benefits of developing more coordinated approaches to certain aspects of their citizenship policies. Slowly but surely a series of European standards on immigrant naturalisation began to develop. In 1997, the Council of Europe took an important step in this direction by opening for signature a new European convention on nationality. The convention did not remove the right of states to regulate their own citizenship policies. Nevertheless, it broke new legal ground by proclaiming it a duty for states to facilitate naturalisation to immigrants living permanently within their borders.¹²

The European Union has also taken a series of cautious steps in the direction of establishing a pan-European approach to citizenship. In a number of communications adopted in recent years, the Commission has promoted the idea of “active citizenship” and joined the Council of Europe in calling on states to facilitate access to citizenship for second and third generation immigrants.¹³ It should be noted that the meaning of “active citizenship” promoted by the European Commission is quite different to the way the notion is used in the British government’s green paper. Whereas in the latter “active citizenship” is a requirement for immigrants to progress from “probationary” to “full” citizenship, the European Commission coined the term to encourage EU member states that have restrictive citizenship policies to promote integration by extending political rights, among other entitlements, to third country long-term residents.

However weak in substance and in “bite”,¹⁴ these nascent European standards in the field of citizenship indicate that, whatever the historical trajectories of each European state’s citizenship policies, and whatever variations exist in the position of different minority groups, all states ought to pursue

The EU has taken a cautious step towards establishing a pan-European approach to citizenship

12. To date, the convention on nationality has obtained 16 ratifications from Council of Europe member states, and 11 additional signatures that await ratification from national parliaments. The United Kingdom is so far not a party to the convention.

13. Commission communication on a common agenda for integration – framework for the integration of third country nationals, COM (2005) 389 final, adopted on 1 September 2005; Commission communication on immigration, integration and employment, COM (2003) 336 final, adopted on 3 June 2003.

14. Both the convention on nationality and the commission’s communications are worded in the form of recommendations, rather than binding instructions on the naturalisation criteria that states should apply.

the same goal in laying down their citizenship criteria: to provide immigrants who enter and wish to settle in a new state with a sense of belonging and a stake in their new society. Some states will pursue this goal by making it difficult for immigrants to acquire citizenship, on the basis that only those immigrants that have acquired proficiency in the dominant language and culture can be trusted to “belong”. Other states will endeavour to create a sense of belonging to the state among immigrant groups by issuing citizenship relatively quickly and encouraging the development of a sense of loyalty through participation. In all cases the desired outcome is the same: to create citizens out of immigrants who are able and eager to participate as equals in the society they live in. In view of this essential similarity, it is easy to see the benefits that can be obtained from engaging in cross-national comparison in this field.

5 Drawing lessons from Estonia

In February 1992, less than six months after the proclamation of Estonian independence and the dissolution of the Soviet Union, Estonia adopted a resolution on citizenship that denied automatic citizenship to any person living in Estonia who had not been an Estonian citizen (or a descendant of an Estonian citizen) prior to 1940, when the territory of Estonia was brought under Soviet control. The vast majority of Estonia's Russian population, who had either been born in or had moved to Estonia in the Soviet era, were transformed overnight into aliens. Estonian policymakers denied charges of discrimination by appealing to the principle of "legal continuity": the aim of the resolution, they argued, was to reconstruct the citizenry of pre-war Estonia, the existence of which had been "illegally terminated" by the Soviet "annexation" of 1940. Anyone who entered Estonia in the Soviet period was therefore an immigrant and should apply for naturalisation accordingly. However, by imposing Estonian language requirements on the process of naturalisation, the new legislation denied Estonian Russians, whose knowledge of Estonian was minimal, the chance to become citizens for many years to come.

This situation was compounded by the scarcity of opportunities during the 1990s for Estonian Russians to learn the Estonian language. State-funded language courses were rare and a combination of economic hardship, residential segregation

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and lack of motivation meant that few Russians in Estonia were able or willing to devote the necessary time and resources to improving their knowledge of Estonian. In 1995, a new citizenship law was adopted in Estonia that introduced even stricter naturalisation criteria, including a longer residence requirement, a more demanding language test, and a new examination on the constitution. Not surprisingly, throughout the 1990s, the rate of naturalisation remained very low: if in 1992 the number of persons with "undetermined citizenship" was over 300,000, in the year 2000 there were still more than 175,000 persons with this status.

Estonia's restrictive approach to citizenship during the 1990s was reflected in the first Estonian state integration programme, adopted in March 2000. This programme gave only negligible attention to the role that the acquisition of citizenship could play in the integration process. While the programme identified the "reduction of the number of persons without Estonian citizenship" as one of its key aims (alongside the "formation of a population loyal to the Estonian state"),¹⁵ the activities outlined in the programme with a view to achieving this aim focused entirely on identifying the necessary resources (financial, technical, human) needed to help non-citizens learn the Estonian language. This persistent connection between citizenship and language acquisition indicates that Estonian policymakers conceived of citizenship purely as a reward to be handed to those non-citizens who "completed" the integration process, understood in terms of acquiring proficiency in Estonian. From 2000 onwards, these activities were carried out in earnest by the government of Estonia, which invested considerable amounts of funding in the development of Estonian language textbooks, language courses and in training Estonian language teachers. The effectiveness of these policies, however, remains so far unclear. In 2006, there were still more than 127,000 "stateless" persons in Estonia, just under 10% of the country's total population. According to the Estonian government's own mid-term appraisal of the integration programme, the average Estonian-language ability of Estonian Russians has not improved significantly (we are told that approximately 60% of adult Estonian Russians have less than average proficiency). Moreover, those who have acquired citizenship through naturalisation (mostly Estonian Russian youth) do not seem to be participating actively in Estonian political life, as there

15. Estonian government state programme, *Integration in Estonian society 2000-2007*, approved by the government of Estonia on 14 March 2000, p.14.

are only six Estonian Russians in the Estonian parliament and none at all in the government.¹⁶ These numbers suggest that Estonia's approach to integration—based on encouraging Russians to become proficient in Estonian and offering citizenship as a “reward” for their efforts—has not been successful.¹⁷

16. European Union 2005, *Integration in Estonian society 2000-2007*, Mid-term Appraisal Report, p.5-6.

17. See Jurado (2006) for a more comprehensive analysis of Estonian citizenship policy, which also points to evidence that this policy has, in recent years, began to shift in a more inclusive direction.

6 Findings and recommendations

The previous section has reviewed in detail the approach to integration advanced by Estonia, based on the logic of citizenship as a “reward”. Conceptually superior to the British approach in so far as it advances a coherent account of the role of citizenship in integration, the “reward” model of citizenship implemented in Estonia has been shown to be problematic as well. The following is an attempt to summarise the findings that emerge from the preceding analysis in the form of principled recommendations that, while offering a response to certain key elements of the British government’s green paper, *The Path to Citizenship*, are also intended to be useful to policymakers in charge of citizenship in other European states.

1. Governments that seek to foster the integration of multi-ethnic societies should put access to citizenship at the heart of their integration strategies.

The acquisition of citizenship remains the most potent measure of integration for immigrants in a receiving state. Only citizens have access to the full set of political rights that are necessary to participate fully and effectively in a society’s economic, social, cultural and political life. By launching a public discussion on the rights and responsibilities of British citizens, the government’s green paper on citizenship could, if managed in a spirit of inclusiveness, be beneficial for the integration of society by helping to raise awareness of the importance of citizenship in the eyes of immigrant and non-immigrant communities alike.

Governments should be explicit about the role they ascribe to citizenship in the integration process

2. When developing strategies for integration, governments should be explicit about the role that they ascribe to citizenship within the integration process.

The role of citizenship can be usefully conceived either as a “tool” facilitating the integration of multi-ethnic societies, or as a “reward” to be handed to immigrants that have successfully “completed” the integration process. The conception of citizenship as a reward presupposes that identity considerations are central to integration and that the receiving society already has a homogeneous set of values that immigrants can “integrate into”. It therefore diagnoses disaffection among individuals or groups as the result of “excessive” cultural diversity. States that subscribe to this view will demand that immigrants pass arduous naturalisation tests to “demonstrate” their degree of integration. The conception of citizenship as a tool presupposes that participation in the life of a society itself helps to shape individual loyalties, not in an exclusive way but by accepting the likelihood of multiple identities. The naturalisation rules of states that subscribe to this model will be modest as according to this view the process of integration only begins when persons of immigrant origin are able to participate as citizens in the life of a society. The British government’s current green paper draws confusingly from both models, claiming, on the one hand, to be introducing greater incentives for immigrants to progress towards citizenship “so that they can become fully integrated into our society” while, on the other hand, referring to citizenship as a status that immigrants need to “earn” by fulfilling a series of prior “integration requirements”.

3. Governments should ensure that their chosen approach to citizenship informs all aspects of their integration policies in a coherent manner.

The importance of developing a coherent approach to citizenship and integration cannot be underestimated. The British approach, which has been to avoid any clear conceptualisation of the role of citizenship in the integration process, has been shown to be ineffectual and even counter-productive. By raising expectations among persons of immigrant origin about access to citizenship and thus the right to participate as equal members of

society only to see those expectations dashed, the contradictions in Britain's citizenship policy have contributed to the very feelings of disaffection that today threaten to undermine the cohesion of British society. The British government should therefore ensure that it advances a coherent approach to citizenship in any new immigration bill that it presents to Parliament this autumn following the green paper consultation.

4. Societies characterised by deep social and economic divisions along ethnic lines are often tempted to opt for the “reward” approach to citizenship, believing that policies which prioritise the role of the state language and identity will be more effective at creating cohesion than policies which respect and accommodate cultural differences – but this logic of insecurity is mistaken.

The case of Estonia, where citizenship has been conceived for many years as a reward to be handed to non-citizens that have developed sufficient competence in Estonian and thus proven their commitment to the state, is a case in point. Fearful that Russians living in Estonia would feel more loyalty towards the Russian Federation than the newly independent Estonian state, the Estonian government felt it necessary to ensure that this population acquired proficiency in the Estonian language as “proof” of their commitment. A similar logic of insecurity is arguably influencing British policymakers, especially since the events of 9/11 and Britain's own July bombings in 2005. It is clear that there are members of certain minority ethnic groups in Britain who feel high levels of disaffection towards the British state. However, the government's response has been to wrongly assume that past policies of “multiculturalism” are responsible for this – even if, as this paper has shown, these policies were far from multicultural in practice – and therefore to favour a more assimilationist approach, based on emphasising the English language and adherence to so-called “British values” as a “marker” of integration.

5. In fact, governments that seek to foster cohesion in multi-ethnic societies should opt for the “tool” approach to citizenship, which prioritises the role of equality and participation rather than language and identity in the integration process.

Today, more than 15 years after the “reward” approach to citizenship was initiated in Estonia, a large portion of Estonia's Russian population continues to be “stateless” and those that have acquired citizenship demonstrate high levels of political disaffection. The Estonian example should act as a reminder to British policymakers that efforts to promote knowledge of the English language and so-called “British values” among immigrants are important but not sufficient for the goal of integration. Minority ethnic participation and mobilisation in British front-line politics, while not as low as in Estonia, is still much lower than that of the majority population. The closer we get to removing the structural barriers that hinder the effective participation of minority ethnic groups, the easier it will be for persons of immigrant origin to identify with mainstream political institutions and embrace “Britishness” as part of their identities. Ensuring that immigrants become citizens with equal rights and responsibilities as rapidly as possible is a necessary pre-condition for achieving this. From this point of view, the introduction of a new immigration status of “probationary citizen”, lasting from one to three years, in the government's current green paper, is potentially problematic as it risks creating even further inequalities, not only between immigrant and non-immigrant groups, but also between immigrants with “probationary” and “full” citizenship status. Even if, in the long-run, as the government hopes, more immigrants are encouraged to apply for a UK passport in order to access the social benefits that would be denied to them as “probationary citizens”, in the short-term, the introduction of this new and vulnerable status would produce yet another tier of rights and responsibilities, and thus engender further social fragmentation.

A logic of insecurity is influencing British policymakers, especially since 9/11 and the July bombings

6. If language tests for citizenship are considered necessary, they should be made as simple as possible, and language-training opportunities should be made widely available and free of charge. The controversial proposal, introduced by the government last summer, to withdraw the universal system of free English language tuition for immigrants would have undermined efforts to strengthen integration in Britain. According to this proposal, free English language tuition would only have been available to asylum-seekers who had been granted leave to remain in the country; in the case of other migrants, they and their employers would have had to contribute to the cost. Such a model—justified by the government in terms of a continuing rising demand for English language tuition that threatened to become “unsustainable”—risked creating a situation similar to that in Estonia during the 1990s, where a scarcity of state-funded language courses combined with the economic and social exclusion faced by many Russians meant that few of the latter were able to acquire the necessary Estonian language skills to apply successfully for citizenship. The British government’s recent decision to go back on this proposal and replace it with a new one, where free language training would be channelled to certain key priority groups among migrants (including those expected to stay in the country for the foreseeable future, but also those with the most economic and social need) is therefore a step in the right direction.¹⁸

7. Citizenship ceremonies, introduced in England and Wales in 2002, should continue to be supported and encouraged by local and national authorities. Developing greater appreciation for the value of citizenship, and the political rights that flow from it, among the general public (including persons of immigrant origin) is a pre-condition for the development of a genuinely inclusive and participatory political culture. Citizenship ceremonies are one of the only instruments currently being used for this purpose. Reports suggesting that local authorities are tiring of citizenship ceremonies should therefore be examined and, if substantiated, the factors contributing to this tendency should be identified and remedied.

8. Governments should introduce further active measures of support in order to remove any structural barriers that make it more difficult for citizens of immigrant origin to participate in the economic, cultural or political life of a state. Citizenship ceremonies, where they exist, constitute only the first step in a new citizen’s participation in the public life of a receiving society. The government must supplement citizenship ceremonies with other measures, including, where appropriate, specific and time-limited positive action measures, such as producing minority ethnic group party lists in certain areas of the country inhabited predominantly by minority ethnic groups, in order to remedy the current under representation of minority ethnic groups in political life.

9. Those involved in the instruction of citizenship education in schools should give a more prominent position to information about the ethnic and religious diversity of British society. One of the key findings of a review on diversity in schools, written by Sir Keith Ajegbo and commissioned by the government in January 2007, was that “issues of identity and diversity are more often than not neglected in the teaching of citizenship education” (Ajegbo 2007, p.7). Teachers who instruct on this subject are said to give more attention to the workings of government and elections than to questions about the diversity of British society, not least because they perceive the latter subject to be “too sensitive” and therefore difficult to teach (Brett 2008, p.4-5). Such findings are problematic and point to the need for more adequate training to be provided to teachers who instruct on this subject and school inspectors who monitor the teaching.

10. Citizenship education should be made available to everyone, not only to schoolchildren but also, through public awareness campaigns, to adult members of society of immigrant and non-immigrant origin. Public authorities are right to see school education as the key moment in the

18. This proposal is currently undergoing a public consultation process, running from 4 January to 4 April 2008. See Kingston, P 2008, Esol funding to focus on long-term immigrants, Education Guardian, 4 January.

life of individuals where the values of equality and respect for cultural differences can be fostered. However, when children exit their schools each evening, and indeed when they graduate and enter the life of adulthood, they need to see that the values they are taught at school do not only exist in textbooks but are part of the living and everyday reality.

11. Governments should be more aware when drawing up new legislation of the existence of European standards in the field of citizenship, which call on states to facilitate naturalisation for persons of immigrant origin living permanently within their borders as an important measure to encourage their sense of belonging in national life. Legislative developments taking place at the European level are not separate from domestic politics; indeed, they have important moral and legal implications for persons living in Britain and other European states. The UK should sign the Council of Europe's convention on nationality and should ensure that knowledge of this convention, and of the European Union's communications in the field of citizenship, are better known among the British public through country-wide information campaigns and by introducing information about these European standards in the school curriculum.

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