

Becoming One of Us?

The politics of citizenship in France, Norway and the UK

Citizenship and naturalization legislation in France, Norway, and the UK has changed substantially more during the 2000s than in previous decades. In which areas of citizenship policy have changes occurred? And how do these changes relate to the trend of reinvigorating the citizenship institution to increase social cohesion? The Policy Brief is a publication from the research project 'Negotiating the nation: Implications of ethnic and religious diversity for national identity' (NATION).

Brief Points

- Citizenship legislation in France, Norway, and the UK has changed more in the 2000s than previously.
- Countering terrorism and striving for social cohesion are two clear areas of citizenship policy development.
- The conflation of citizenship, immigration, and terrorism questions in policy creates dilemmas.
- Permitting dual citizenship is increasingly becoming the norm in Europe.

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What is citizenship? Vertical and horizontal dimensions

Citizenship refers to the relationship between the state and the citizen (vertical) and the relationship between citizens (horizontal).¹ Citizenship is constituted by the mutually overlapping spheres: rights, duties, participation and membership. These are formalized through the citizenship institution. At a practical level, there is an objective distinction between those who are members of a particular political community: those who hold citizenship and have a passport, and those who do not, and thus are not formally members. A further distinction is subjective, between those who feel a sense of belonging and community with the people residing within the territorial boundaries of a state, and those who do not.

There are different intersections of objective and subjective forms of membership, where national and ethnic identities play a role. This may be illustrated with observed tensions in present-day Europe, where there is often a conflation of the nation: who are we – the people, with citizenship: who are we – the political community. In different languages the very terms citizenship and nationality are often used interchangeably. Or there is an unresolved relationship between these terms.

Citizenship in Europe today

Negotiation over collective ‘we-hood’ is characteristic of the politics of citizenship in European societies. Both states and citizens, but also non-citizen residents, negotiate the need for some categories to be exclusive: either you are a citizen or not, with the need for other categories to be inclusive: you can belong to a community, even if not formally a citizen. Simultaneously, the increasing possibility of holding dual citizenship leads to overlapping layers of exclusive categories, as citizens can be citizens of two states.

European citizenship policy is highly affected by regulations on intra-EU mobility. Many substantive rights are extended to residents, whether citizens or not, if they are citizens of an EU member state (or the EEA in Norway’s case). For instance, rights such as voting in local elections are extended to permanent residents. This erosion of citizenship, and development of quasi-citizenship like status

for other European citizens, adds another layer to contemporary European citizenship politics.

Within this landscape, citizenship policy development in the 2000s has in particular been focused around two sets of issues: countering terrorism and increasing social cohesion. States seek to reinvigorate the citizenship institution in relation to both these sets of concerns, resulting in dilemmas of inconsistency, where previous liberal and restrictive regimes are changing.

The citizenship institution in Norway, France and the UK

While changes in citizenship legislation have historically been rare, all three states have debated and considered amendments in their citizenship and naturalisation legislation continuously since the late 1990s. There has been a substantial increase in the frequency of changes in citizenship legislation. This is a recent development, where the past 15 years differ from preceding decades. The most recent legal amendments in the UK, France and Norway, are reflective of this trend.

In the UK, the government introduced an English language test, a citizenship exam, and compulsory citizenship ceremonies in 2002. In 2009, the ‘Borders, Citizenship and Immigration Act’ set the requirement for naturalization for non-EEA immigrants to eight years of residential status, compared to five years previously; and to five years of residential

status if married to a British citizen, compared to three years before.

In France, there have been several major changes in citizenship legislation during the 2000s. With the ‘Sarkozy laws I and II’ in 2003 and 2006, the rules for family reunification were tightened, and the period before a foreign spouse to a French national can naturalize was increased to two and thereafter four years. The 2006 law also required to-be citizens to have satisfactory knowledge of the French language, French history, and to accept dominant norms and values, all to be verified in an interview with a French official. In 2011, the ‘Immigration, Integration and Naturalisation Act’ introduced a language test including questions on history and culture, and requiring to-be citizens to sign a charter of rights and duties, confirming their adherence to the state’s principles and values.

The current Norwegian citizenship legislation is from 2005, when a major new Citizenship Act was put in place. While the option of dual citizenship was debated in the preparatory works for this legislation, dual citizenship was not permitted, leaving Norway among few European countries prohibiting dual citizenship. Amendments to the citizenship legislation have been discussed over the past decade, including current proposed amendments to add a citizenship test to the conditions for naturalization. In Norway, there is also a language requirement, where citizens-to-be have to document knowledge of Norwegian.

	Norway	France	United Kingdom
Dual citizenship allowed	No	Yes	Yes
Citizenship knowledge requirement	No	No (interview)	Yes (test)
Language requirement	Yes	Yes	Yes
Citizenship ceremony	Not mandatory	Not mandatory	Mandatory
Denaturalisation due to criminal offence	No	Citizenship can be removed from naturalized citizens Passport can be confiscated	Citizenship can be removed from naturalized citizens Passport can be confiscated

Figure 1: Citizenship policies in Norway, France and the UK. Orange: Restrictive citizenship policy. Blue: Liberal citizenship policy.

Across the Norwegian, French and British cases, we find that there are two dimensions of citizenship policy that are prominent in the changing policies throughout the 2000s: citizenship policy intersecting with the aims of countering terrorism, and increasing social cohesion. In the Norwegian case, the concern with dual citizenship and dual loyalties is a third dimension, which is more often than not conspicuously absent from debates on citizenship legislation.

Citizenship policy and countering terrorism

The intersections of citizenship policy with legislation on countering terrorism are both explicit and implicit. Since 2000, there have been several amendments to counter-terrorism legislation in both the UK and France.

In the UK, changes widened the definition of terrorism and enabled detention without charges or trial. In February 2015, a new Counter Terrorism Act was introduced, extending state powers to control individuals suspected of terrorism, including the power to issue temporary exclusion orders and invalidate citizens' passports (while citizens are abroad). In France there have been four major counter terrorism law amendments since 2000. The latest law, introduced in 2014, included a clause allowing the state to prevent citizens from leaving the territory on very broad grounds. Following the Charlie Hebdo attack in Paris in January 2015, the French government has announced a new counter terrorism Bill to be introduced in March, to reinforce the legal framework for terrorism surveillance.

In Norway, the government is exploring proposed legislative measures to withdraw citizenship from citizens who are perceived to be a threat to "vital national interests", in line with existing legislation in other European countries. Due to Norway's single-nationality policies, the option of withdrawal of citizenship is complicated by established human rights principles granting protection against statelessness. Thus legislative measures aiming to counter terrorism risk creating conflicts with other aspects of Norwegian citizenship legislation.

Counter-terrorism legislation in the 2000s poses a new challenge to the citizenship institution, as erosion of citizenship rights can be

a consequence of tougher security legislation. Thus, balancing concerns about security with concerns for civil liberties has become a central issue. Striking a balance constitutes a contested dimension of the politics of citizenship.

Reinvigorating citizenship to increase social cohesion

States across Europe are reinvigorating citizenship as part of efforts to increase social cohesion. This is articulated through symbolic manifestations of citizenship, most concretely in the form of citizenship ceremonies, books and a focus on values.

In the UK, citizenship ceremonies are compulsory, and have been carried out since 2004. In addition to giving the local authority an opportunity to welcome new citizens and encourage democratic participation in society, the ceremonies were introduced in order to give added salience to the attainment of citizenship. In France, ceremonies are not compulsory for new citizens, but it is compulsory for the local *préfet* to offer such ceremonies. By contrast to the UK, the French citizenship ceremony does not include swearing an oath of allegiance to the nation. The idea behind the introduction of ceremonies in France was nevertheless similar to that in the UK, to create a *rite de passage* for new citizens. Norway also has voluntary citizenship ceremonies, organized at the county level. Similar to the British version, there is an oath for new citizens, yet given the voluntary nature of the ceremonies, it is also a voluntary oath. The citizenship ceremonies exemplify a European trend where citizens-to-be must demonstrate their support for particular values, defined by the state. The formalization differs, where in the UK new citizens confirm their support for British values during the ceremony, while in France this happens during a pre-naturalization interview. Both are, however, examples of how the attainment of nationality is often conflated with questions about national identity.

However, the content of the values new citizens are to subscribe to, accept, or respect, is rather abstract. In both the UK and Norway, citizens-to-be are presented with a book, in the UK containing necessary knowledge to pass the compulsory citizenship test, in Norway as a gift book given to new citizens dur-

ing the citizenship ceremony. While these books have different purposes, both synthesize the countries' history, culture and values, albeit in different ways. A striking difference in how values are described becomes apparent when comparing: in the UK a list is presented (democracy, the rule of law, individual liberty, tolerance and participation in community life), while in Norway values are presented in abstract terms, with reference to well-known Norwegian literature, fiction for children and folk tales (*Kardemommeloven*, *Hakkebakkeskogen*, *Askeladden* and *Janteloven*).

Recent citizenship policy developments in Europe reveal an increasing focus on horizontal dimensions of citizenship, in addition to vertical ones. Citizenship ceremonies for those who have undergone naturalization and become new citizens are an example of how this is translated into practice. Citizenship ceremonies can be understood to be a formal part of the naturalisation process, and an affirmation of the vertical state-citizen relationship. However, it is evident that the intention and performance of citizenship ceremonies aims to increase new citizens' sense of belonging as citizens of a political community, in addition to their loyalty to the state. Here, inclusion within a shared national identity, often seen in relation to sharing specific 'national values', is a central concern. Citizenship ceremonies may thus be seen as a formalised script for 'becoming one of us'.

Dual citizenship and national identity?

An area where there is a clear contrast between the three countries is that of dual citizenship. French and British laws permit dual citizenship and do not require foreigners who are granted citizenship to renounce their original citizenship. Dual citizenship has been accepted in the UK since 1948 and since 1973 in France. Despite permitting dual citizenship, this is not explicitly encouraged. In the case of France, there is rather an explicit aim of limiting the number of cases of dual citizenship.

In Norway, single citizenship remains the main principle. However, in line with the European trend of increased acceptance of dual citizenship, the practice is increasingly debated. Among the reasons for debate is the fact that increasing proportions of those granted Norwegian citizenship are exempted

from the rule of renouncing previous citizenships. Exemptions are made chiefly as a consequence of renouncing previous citizenships being impossible in principle or practice, or both, or in cases where such renouncement has severe consequences for the individuals involved, such as the loss of right to inheritance, for instance.

The Norwegian Citizenship Act from 2005 retained the single citizenship principle, and although the matter is increasingly debated, no legal steps to change Norwegian legislation have been signaled. Given the parallel reinvigoration of Norwegian citizenship policy, including the introduction of citizenship ceremonies, citizenship policy developments have much in common with trends found elsewhere in Europe. A significant difference, however, is that Norway – as of the summer of 2015 – is the only Scandinavian state upholding the principle of single citizenship. This stance on citizenship policy has some clear implications both for the framework within which immigrants in Norway relate to Norwegian citizenship, and for the complicated interactions of citizenship with questions about national identity and social cohesion in diverse societal contexts. By contrast to France and the UK, the Norwegian state thus does not formally acknowledge Norwegian citizens' ties with other places, communities and states in the form of other citizenship(s).

types and, in practice, European states do not adhere to either, but adopt a mixed approach, as reflected in the varying principles that legislation on naturalization draws on. A third ideal type of citizenship is therefore increasingly emerging: *jus domicile* – citizenship based on location of residence.

Transformations in how citizenship policies define requirements for becoming a citizen are a significant feature of politics in Norway, France and the UK. This occurs in a context where questions about becoming – and being – a citizen in Europe, intersect with a reality of – and perceptions about – increased ethnic and religious diversity. In approaching contemporary diverse and multicultural realities, restrictive and liberal citizenship perspectives are often mixed, with states adopting a pragmatic position in relation to different parts of their citizenship legislation.

Contemporary citizenship policy is both concerned with integration, security and the threat of terrorism play a role, but also with emigration, and consequences of mobility and globalization. These diverging concerns result in dilemmas of inconsistency. Simultaneously, legislation on naturalization – or becoming one of us, as part of the political community within nation-states – is becoming politically more salient, as part of a new landscape of citizenship politics in Europe. ■

The politics of citizenship in contemporary Europe

The citizenship institution is among the state's instruments for nation-building. Two ideal types of citizenship and nation-building approaches are often referred to in Europe: *jus solis* - citizenship based on rights and membership in a territorially defined state, and *jus sanguinis* - citizenship based on ethnicity and blood ties. However, these are *ideal*

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THE PROJECT

This Policy Brief is part of the project 'Negotiating the nation: Implications of ethnic and religious diversity for national identity' (NATION). The project explores the ongoing negotiations of 'the nation' in contemporary European societies, based on the empirical cases of Norway, France, and the United Kingdom.

Notes

1. In Norwegian there are two different terms for these two dimensions, namely "statsborgerskap" (legal vertical) and "medborgerskap" (social horizontal).

Further Reading

- Erdal, M.B. & Sagmo, T.H., 2015, Tap av statsborgerskap og integrering, i NOU 2015:4 Tap av statsborgerskap, Vedlegg 2, p. 99-118.
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