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– A Comparative Analysis of Language Requirements in Naturalization Processes in the United States, Canada, Australia, and New Zealand

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Citizenship is an extremely complex concept and, as such, can be utilized in sociolinguistic research in order to account for differences in language policies. Language requirements in naturalization processes point to differences in particular countries' language policies. Specifically, analysis of such language requirements reveals the different facets of the countries' language policies in terms of the ways in which applicants for citizenship via naturalization are expected to know and use the countries' official language(s) or the main language (in cases where there is no official language). The paper aims to address changes in such language requirements in four immigration countries which are bound by a specific past associated with colonialism and the fact that English is the medium of communication for the majority of the population. The countries are: the United States, Canada, Australia, and New Zealand. A comparison of past and current language requirements provides an insight into both past and current status of immigrants and their languages in the four countries. This, in turn, leads to assessments of citizenship increasingly being regarded more as an instrument of inclusion rather than as an instrument of exclusion.

Keywords: citizenship, language requirements, inclusion, exclusion, language policy, immigrants.

Ciudadanía como instrumento de inclusión y exclusión: estudio comparativo de los requisitos lingüísticos en el proceso de nacionalización en Estados Unidos, Canadá, Australia y Nueva Zelanda. La complejidad del concepto de la nacionalidad permite su uso en los estudios sociolingüísticos con el fin de interpretar diferencias entre las políticas lingüísticas. Los requisitos lingüísticos en los procesos de

nacionalización indican las diferencias entre las políticas lingüísticas de algunos países. Es decir, el análisis de requisitos lingüísticos desvela diferentes aspectos de las políticas lingüísticas en cuanto al conocimiento que se espera del solicitante de la nacionalidad de la(s) lengua(s) oficial(es) o dominante(s) del país (en el caso en que no exista una lengua oficial). El objetivo de este trabajo es señalar el cambio de esos requisitos lingüísticos en cuatro países receptores de inmigrantes que comparten un pasado caracterizado por el colonialismo y el hecho de que el inglés es el medio de comunicación de la mayor parte de la población. Los países en cuestión son: Estados Unidos, Canadá, Australia y Nueva Zelanda. La comparación entre requisitos lingüísticos del pasado y del presente ofrece una imagen del estatus pasado y del actual de los inmigrantes y sus lenguas en los cuatro países. Eso conlleva la conclusión de que la nacionalización cada vez más se considera más bien un instrumento de inclusión que de exclusión.

Palabras claves: nacionalidad, requisitos lingüísticos, inclusión, exclusión, política lingüística, inmigrantes.

1. Introduction

The scope of sociolinguistics encompasses research on language variation in relation to an array of social and cultural factors. Sociolinguists also engage in discussions on how different socio-political and historical contexts contribute to the establishment of a country's language policy and, consequently, how such language policies may affect individual language use and attitudes towards speakers of different language varieties. More recently, studies on language policies have frequently focused on the analysis of changes that occur both within the legal framework that regulates the status of immigrants and within the realm of creating attitudes towards immigrants and their language use. This is exemplified in the following parts of this paper where reference is made to authors who have dealt with such issues. Historical facts (e.g. changing immigration patterns, needs of particular countries to increase population growth rates, differences in economic dynamics, etc.) represent primary elements in accounting for both the countries' legal frameworks related to citizenship grants and attitudes towards immigrants and their linguistic repertoires. Citizenship is a multilayered concept that transcends the most obvious, legal framework, and is, therefore, frequently analyzed in relation to concepts of nationality and ethnicity. Ethnic issues have been particularly prominent in developed countries marked by colonial past, and are set not only in the broader, political framework, but also in specific socio-cultural and sociolinguistic contexts. Such prominence is evident in the different ways the concept of

citizenship has been viewed in terms of the cost-benefit ratios in relation to increasing immigrant inflows. For example, “the growing business presence of Asian-Americans has made it possible for them to be cast by media and politicians in more ethnicizing, less racializing terms than they were a few decades ago” (Urciuoli 1996: 18). Nevertheless, legal frameworks proposed by countries’ acts which unambiguously stipulate prerequisites which need to be met in order to be granted citizenship may also be effectively used for language policy analyses. Analyses of citizenship grants via the naturalization process allow for an in-depth analysis of language requirements placed before immigrants.

Selected countries, in which the English language is either the official or the main language and that are characterized by a common historical link related to colonisation, represent ideal candidates for a comparative analysis of their language policies in the context of the accompanying past and current changes of the English language requirements. On one hand, common features of past English language requirements among major immigration and English-dominant countries can be associated with a set of similarity traits identified in their socio-historical contexts. The countries’ colonial and post-colonial backgrounds provide valuable contexts within which language issues can be analyzed, as “the long term conjunction between English and colonial discourses has produced a range of linguistic-discursive connections between English and colonialism” (Pennycook 1998: 4). Accordingly, the colonial heritage of English-dominant countries reveals that the ways in which the dichotomies between the language of the majority and the languages of minorities had been constructed and perceived had an important impact on how past language requirements in naturalization processes were actually structured and considered relevant for granting citizenship. This may allow for the interpretation of their past view of citizenship more as an instrument of exclusion rather than inclusion. On the other hand, current socio-cultural contexts associated with features of the countries’ English language requirements and other language-related information (such as organization of English-teaching classes¹ and/or provision of help in the form of materials for the preparation for the test) lead to the identification of the nature of changes made to past language policies. Current English language requirements should be viewed in the context of globalization and the status of English as the global *lingua franca*². Such an approach could reveal whether and to what extent the cultural exchanges and a more widespread acknowledgment of the values of multilingualism in English-dominant countries are reflected in language requirements in naturalization processes of these countries.

2. Citizenship – an instrument of inclusion or exclusion?

The concept of citizenship is most frequently interpreted in terms of the basic functions it usually performs. The analysis of fundamental properties of such functions may lead to a classification in which the criterion of objectivity/subjectivity is singled out. Thus, if not only a sense of belonging and a feeling of security but also provision of the possibility to exercise a range of rights and responsibilities (Osler 2005: 4) are taken as the basic functions of citizenship, allocation of rights and responsibilities obtained through citizenship (either via birth or the naturalization process) clearly becomes a more objective function in comparison to a sense of belonging and a feeling of security which represent more subjective and individually perceived functions. Although access to rights and responsibilities represents a key factor in evaluations of different countries' citizenship statuses, a sense of belonging to a particular community can be put forward as a more crucial constituent in certain contexts. This is certainly true for analyses of the concept of citizenship with regard to immigrants, language policies of immigration countries, identity and a sense of belonging to particular language communities. In such contexts, there is a move from analyzing citizenship strictly in the context of political practices to investigating it in the broader framework in which special emphasis is placed on human relationships and in which such political practices serve "to shape and sustain the collective life of the community" (Bellamy 2008: 3). Undoubtedly, notions of citizenship and identity are profoundly intertwined, primarily from the viewpoint of regarding citizenship as a strong marker of various types of identities³. Accordingly, citizenship could be regarded as an instrument of exclusion. As such, it primarily serves to exclude individuals who are not granted citizenship from participating in the aforementioned objective functions it performs – the possibility to exercise a range of rights and responsibilities.

From a more subjective viewpoint, citizenship regarded as an instrument of exclusion may cause a sense of alienation and feelings of insecurity among members of immigrant communities, even when they are granted citizenship. This can be attested in a number of ways, including the analyses of particular countries' language policies towards immigrants. For example, a diachronic overview of language policies of major immigration countries would indicate that these language policies have changed during different periods. Although major immigration countries are highly multilingual, their language policies have not always attempted to preserve each and every language of ethnic minorities but have at times made attempts to uphold different facets of assimilation practices, regardless of the fact that the immigrants whose mother

tongues are different have been granted citizenship. On the other hand, citizenship can be predominantly viewed as an instrument of inclusion. As such, it primarily serves to ensure the possibility to exercise a range of rights and abide by responsibilities for those who are granted citizenship. From the subjective viewpoint, citizenship may be argued to cause feelings of security and a sense of belonging even in relation to members of immigrant communities, and especially if emphasis is placed on collective identities and assimilation processes. This can also be attested via analyses of particular countries' language policies towards immigrants. For example, in recent decades, immigration countries have also had to modify their language policies to different degrees in order to meet the current demands for full acknowledgment of multilingualism. This is particularly true if granted citizenship is viewed in relation to the different documents attesting the rights of ethnic minorities, such as the *Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities* (adopted by the UN General Assembly in December 1992) and the *European Charter for Regional or Minority Languages* (adopted by the Committee of Ministers of the Council of Europe in October 1992). However, from the subjective point of view, interpretations according to which citizenship grants cause feelings of security among immigrants seem more ambiguous than those interpretations according to which citizenship grants are associated with feelings of insecurity among immigrants.

Undoubtedly, citizenship reveals itself in the function of inclusion – to keep individuals “in”, but also in the function of exclusion – to keep others “out”. Therefore, citizenship, regarded as a dichotomy containing both the function of exclusion and inclusion, must be accounted for in terms of the degree of both functions it performs in a particular community. One way of doing so includes comparing the functions of inclusion and exclusion of citizenship to the same functions of other, closely related concepts representing different types of identities, primarily the concepts of nationality and ethnicity. If the notion of exclusion is taken into consideration, it is possible to accept that “while nationality and ethnicity as identities are exclusive and could generate inequalities, citizenship could be essentially inclusive and equality-oriented” (Oommen 1997: 20). In other words, although nationality and ethnicity, as aspects of the overall identity, predominantly refer to categories of exclusion, citizenship does not necessarily have to be exclusive. The key idea is emphasis on the possibility of the inclusive character of citizenship. However, such a possibility is contrasted with the reality of exclusion that many immigrant minority groups and their languages actually experience. This may be accounted for by the fact that, historically speaking, granting citizenship frequently depended precisely on predominantly exclusive categories, such as nationality and ethnicity. Nations and ethnic groups represent distinctive categories as

“ethnic groups are often subsets of nations or they function as collective entities across the borders of nation-states” (Extra and Gorter 2008: 7). A distinction between citizenship and nationality also needs to be taken into consideration, as “nationals belong to a nation-state but they may not have all the rights linked with citizenship (e.g., voting rights); in this sense, citizenship is a more inclusive concept than nationality” (Extra and Barni 2008: 18). Although citizenship represents a more inclusive category from such a perspective, the potential of the inclusive character of citizenship is not always maximally realized. Analyses of countries’ citizenship requirements in naturalization processes in different periods reveal that citizenship may be employed as an instrument of exclusion, and nationality and ethnicity represent the basic criteria upon which such exclusion rests.

Research on nationality and citizenship in relation to exclusion very frequently implies the distinction between their conceptualization in non-European English-dominant immigration countries and in the EU member countries. Taking into consideration the historical perspective, nationality and citizenship are deeply embedded within the concepts of *jus soli* and *jus sanguinis* (Extra, Spotti and Van Avermaet 2009: 10). Accordingly, non-European English-dominant immigration countries base their conceptualization of nationality and citizenship on *jus soli* (law of the ground; based on the country of birth), while the EU member countries base it on *jus sanguinis* (law of the blood; based on parental origins). Immigrants to European countries are predominantly faced with this principle, but European emigrants accept the *jus soli* principle when acquiring citizenship in non-European countries (Broeder and Extra 1999: 20-21).

3. Citizenship and language requirements in the United States, Canada, Australia, and New Zealand

Analyses of the relationship between citizenship and language requirements in naturalization processes can focus on different sets of countries, their language policies and, in relation to different language policies, requirements placed before immigrants in their attempts to acquire the countries’ citizenship. If the focus of interest is narrowed to those countries in which a historical presence of imperial power can be traced, the number of countries which should be identified in such an analysis is still a fairly substantial one. On the other hand, if the focus is placed only on language requirements in countries in which English is an official language, or at least the primary medium of communication (main or dominant language), a relatively large number of countries still need to be taken into account. If the aim is the analysis of a more limited

number of countries, both the broader, socio-historical and narrower, linguistic criteria need to be taken into consideration.

In this paper the choice of the countries is based on socio-historical and linguistic data. It focuses on the analysis of the relationship between language policies and language requirements in applications for naturalization in the United States, Canada, Australia, and New Zealand. Thus, insights into language requirements in naturalization processes of selected countries can be successfully related to different language policies. Smith (2004: 21) emphasizes the unique colonial experience of the United States, Canada, Australia, and New Zealand in the following way:

Canada and Australia are two of a handful of countries of settlement whose origins lie in the age of empire. Their experience is not the experience of formal imperial possessions in Asia, Africa or even South America. In them, as in the United States and New Zealand, new British societies based on mass immigration were replicated with little regard for the social, economic or political practices of existing people.

Additionally, a common socio-historical link related to the concept of citizenship in these four countries can be traced in similar acts proposed by the respective governments at the end of the nineteenth century. The primary aim of the acts was to use regulation of citizenship grants to ensure the exclusion of specific immigrant groups⁴. Language requirements represented a strong means of enforcing such restrictive measures of using citizenship as an instrument of targeted exclusion. What is more, in arguing “against the stipulation of ‘language’ and ‘language tests’ as criteria for obtaining citizenship”, Shohamy (2009: 45) claims that “these two categories represent biased, discriminating and unattainable requirements that can lead to invalid decisions about the rights of people in societies”. However, the nature of restrictions on immigrant inflows has changed throughout the countries’ histories, and the most evident changes started occurring from the 1960s. Namely, “for Canada, Australia, New Zealand, and the United States, some of the pressure for less restrictive policies came from the drying up of traditional sources of immigrants” (Cairns 1999: 34).

Although the analyses of naturalization processes in the analyzed countries might result in interesting comparisons of other prerequisites, such as required residency periods⁵, language requirements represent the focus of this paper. The shared historical and linguistic characteristics respectively correspond to the countries’ unique historical link to the British Empire and similar attitudes towards different types of immigrants during specific periods of their citizenship histories, and to

the fact that in each of them English is either an official language, or at least the basic medium of communication (main or dominant language).

For each of the four countries the analysis begins with a diachronic overview of the most important legal documents which were passed in order to regulate the countries' citizenship and immigrant inflows. Such an overview is followed by the presentation of the most prominent characteristics of the countries' policies towards immigrants in the periods in which the acts were passed. What follows is an overview of current requirements in naturalization processes with special emphasis on the language requirements, as well as other available language-related data, such as placing emphasis on the importance of learning the language as presented by authorized institutions, or provision of help to prepare for the language test. The shared historical and linguistic characteristics are interpreted in relation to the roles language requirements have in naturalization processes as elements of processes of either inclusion or exclusion in citizenship applications.

3.1. Citizenship and language requirements in the United States

Insistence on stricter language requirements in naturalization processes in the United States directly reflects the broader socio-historical context at different periods. The insistence on the language element was advocated by the Immigration Restriction League during the 1890s, when economic depression was in full swing (Del Valle 2003: 90). Since illiteracy in English was at the time used to deny citizenship to poor and uneducated immigrants, it is no surprise that this policy continued at the beginning of the twentieth century, especially after World War I and the economic situation of the time. Although "some degree of tolerance of non-English languages existed in the United States prior to the period of massive demographic influxes and significant changes in the shape of the country's economy (...)", it "must be seen as calculated, as a policy of sufferance rather than one which openly encouraged multilingualism" (Sagarin and Kelly 1985: 30-31). Similar to the Canadian, Australian and New Zealand policy towards immigrants of Asian origin, the United States history demonstrates its own peculiarities in terms of treatment of Asian immigration, especially if the Chinese Exclusion Act of 1882 is taken into consideration (Huebner and Uyechi 2004: 248-249)⁶. The Act refers to restriction of Chinese immigration for the period of ten years although the denial of citizenship on racial grounds lasted a relatively long time in the United States. Moreover, "segregation of Asian-origin students was legal in California from the late 19th century to the mid-20th century" (Wiley 2002: 55). Denying US citizenship on both racial and national grounds was definitely abandoned with the McCarran-Walter Act of 1952 (Bloemraad 2006: 21). The 1930s and the 1940s were

not marked by major developments in language policy, although even such a situation can be identified as a specific type of language policy. Namely, Ricento (1997: 138) notes that “the failure of the federal and state governments to address the educational needs of language minority students and other historically marginalized groups is an example of policy-making through inaction”. In comparison, the 1950s and the 1960s were decades of significant changes in the development of language policy in the United States. Although they were not motivated primarily by linguistic, but racial and ethnic issues, the changes that occurred in the period left a significant mark on the development of language policy (Hernández-Chávez 1995: 150). This primarily refers to creating adequate bilingual contexts, especially in the educational system. However, massive immigrant inflows that occurred in the United States in the following decades of the twentieth century, especially those of Hispanic origin, resulted in attempts to use the English language as a criterion for exclusion. Such attempts are imbedded within the English-only movement⁷ of the 1980s, the aim of which was to encourage activities that would lead to making English the official language of the United States. Promoters of such activities perceive “programs that accommodate immigrants in their native languages as a kind of ‘linguistic welfare’ system that lowers the incentive to learn English and restricts them to low-skilled, low-paying jobs” (Romaine 2010: 471). The aim of assimilationist attempts has been challenged by linguistic pluralists’ arguments who view “recently adopted pluralistic language policies as long-overdue efforts to ameliorate injustices stemming from the hegemony of the English language in a country that has never been monolingual” (Schmidt 2000: 77). Regardless of the different views on how the United States language policy should be developed in the future, it should be noted that, comparatively speaking, the process of immigrant assimilation and shift to English has been extremely rapid. Rumbaut (2009: 37) notes the different studies which have attested to “a rapid process of intergenerational ‘Anglicization’ that is effectively completed by the third generation”.

Language requirements in naturalization processes in the second half of the nineteenth century and throughout the twentieth century were clearly motivated by economic factors. The United States experienced a significant decrease in employment rates at the beginning of the twentieth century. This was the period when immigrant inflows had to be regulated more strictly, and one of the ways of achieving this was by means of higher standards in the English language competence as opposed to a more lax approach to language prerequisites prior to the second half of the nineteenth century (Dell Valle 2003: 90). This trend continued in the second half of the twentieth century when the language prerequisites were clearly stipulated.

Detailed information about the United States' naturalization process and current language prerequisites is available to prospective citizens via US Citizenship and Immigration Services⁸. USCIS drafted a document entitled *A Guide to Naturalization*⁹ in which all relevant information regarding the naturalization process is provided. Besides other criteria (being minimum eighteen years of age, having permanent US residency for at least five years (or, exceptionally, three years), knowing the basics of US history and government, being of good moral character, not ever have deserted from the US Armed Forces, being willing to perform military or civilian service for the United States, supporting the US Constitution and being willing to take an oath of allegiance to the United States), the document stipulates the language requirements. It states that applicants have to "be able to read, write, and speak basic English" (p. 26). The United States' framework appears to be fairly straightforward and detailed. It demands that, in addition to the civics test, a special test be taken in which reading, writing and speaking English is assessed. The civics test (referring to applicants' knowledge of US history and government) and the English test represent separate prerequisites. This is confirmed by the fact that, on the grounds of disability or impairment and their age and time as permanent residents of the United States, certain applicants may request an exemption from taking the English test, but they can request an exemption from the civics test only on disability and impairment grounds. Besides the aforementioned prerequisites in order to be eligible for the US citizenship grant, the ability to speak English is also determined by a USCIS Officer during the eligibility interview in which information on the Form N-400¹⁰ is discussed. The reading part of the test includes reading one out of three sentences correctly, and the writing part includes writing one out of three sentences correctly.¹¹ The US Citizenship and Immigration Services also provide free materials for the preparation for the test¹². Although the stated aim of the language test is to determine whether the applicant "can have a basic conversation in English" (Bray 2010: 150), applicants are advised to prepare well for the English test and to take it very seriously because "for some people, the English exam can be one of the most difficult parts of the citizenship process" (Bray 2010: 151). The gathered information concerning language prerequisites in the United States' naturalization process points to the conclusion that the United States' concept of citizenship as an instrument of inclusion is fairly restrictive. The knowledge of the English language is greatly emphasized as an important prerequisite for successful assimilation. Naturally, this is partly due to the historical reasons of the United States' creation of a successful multicultural, multilingual, and, above all, economic melting pot.

3.2. Citizenship and language requirements in Canada

Canadian policy towards immigrants in the first decades of the twentieth century was fairly restrictive as the policy of the time “clearly set out to encourage some (Europeans) and discourage others (Asians) on the basis of nationality or country of origin (race) and occupation” (Simms 1993: 337)¹³. In this sense, Canada’s policy towards immigrants bears resemblance to the United States’, Australia’s, and New Zealand’s policy of the time. The 1940s were clearly years of substantial socio-historical changes for countries whose earliest histories were marked by British colonial heritage. This is evident in the Acts concerning the countries’ citizenship. Canada drafted the *Canadian Citizenship Act* in 1946, two years prior to Australia’s *Nationality and Citizenship Act*. The privileged status of British subjects was terminated with the *Citizenship Act* of 1976¹⁴. Although the Canadian immigration policy bears many resemblances to all countries analyzed in this paper, scholars have frequently focused on the most obvious characteristics it shares with the Australian language policy. The similarities between the two countries’ immigration policies can be identified in the significant changes that occurred in the 1960s when both countries abandoned obvious preference for immigrants of European origin and opened up for immigrants of Asian origin, but also in the countries’ systems for the evaluation of immigration applications (Simmons 1999: 24). As in Australia, Canada’s citizens were not required to abandon their British citizenship (Nygren-Junkin 2009: 213; Galligan 2005: 288). Immigrants who applied for Canadian citizenship in 1947 were required to demonstrate their competence in either of the official languages – English or French (Mackey 1998: 25). Another parallel with Australia’s language requirements when applying for naturalization lies in the fact that immigrants to Canada who were experiencing difficulties with the language requirements were also encouraged to take language courses. They were organized in cooperation between the Canadian Citizenship Branch and different provinces, some of which (e.g. Québec) did not want to have any part in the organization of such courses (Burnaby 1997: 153; Mackey 1998: 25-26).

In comparison to Canada’s policy towards immigrants at the beginning of the twentieth century, which was fairly restrictive especially towards immigrants of Asian origin, the last decades of the twentieth century were marked by significant changes. This is attested by the fact that, in contrast to the previously known “White Canada”, “in 1996, the top seven source countries for immigration to Canada were Asian” (Cairns 1999: 34). However, Hébert and Wilkinson (2002: 15) claim that, regardless of the fact that multiculturalism is emphasized as one of the basic distinguishing features of Canadian identity as stipulated in the *Canadian Multiculturalism Act (Act for the Preservation and*

Enhancement of Multiculturalism in Canada), “the Canadian policy, which provides political recognition of social and cultural pluralism as inherent to citizenship, is articulated differentially, and this reality has significant implications for access to social and state resources”. Changes that have occurred in Canada’s immigration policy are justified in different ways. Lacking reference to other elements that contribute to the creation of Canada’s immigration policy (e.g. issues of political and social inequality), “state leaders have justified immigration primarily as a mechanism to ensure that Canada has the kind of workers necessary for economic prosperity” (Simmons 1999: 21).

There is a noticeable overlap of the characteristics of the United States and the Canadian language policies. One of the most obvious overlaps can be traced in the 1960s in the United States and Canada when “previously subordinated ethnolinguistic groups mobilized to seek greater ‘equality’ with a dominant anglophone majority” (Schmidt 1998: 40). In comparison to the United States language policy, the primary aim of which is to ensure the position of the majority group despite noticeable efforts of growing minorities, the focus of the Canadian language policy is placed on negotiations between the two dominant groups¹⁵. Language issues in Canada became especially important in the second half of the twentieth century with special emphasis on the relationship between anglophone and francophone groups. The Official Languages Act of 1969 provided equal status to English and French. However, the tensions between the groups have remained, mainly because “the use of English in majority French-Canadian environments is value-laden, and is inextricably linked to conscious (and sometimes self-conscious) reactions to the socio-political environment; the use of English *signals* identity” (Piper 1989: 169). The sociolinguistic situation in Canada is very complex. Major linguistic issues in Canada include the relations between anglophone and francophone groups, and the analysis of such relations requires a detailed account of the sociolinguistic context of particular provinces, especially of Québec, where, in comparison to other provinces, the cultural uniqueness is closely tied to the linguistic uniqueness, i.e. the fact that it is a predominantly francophone province. Besides anglophone–francophone issues, in recent decades Canada has had to face a new set of linguistic issues associated with the increase in the share of allophones. Namely, “despite the increase in *numbers* of both anglophone and francophone populations between the censuses of 1991 and 2001, their *share* of the overall population has decreased. (...). The drop in share of both populations is attributed to the increase of 2.7% in the share of allophones” (Conrick 2007: 236).

Immigrants applying for Canadian citizenship have to be permanent residents of Canada for at least three years (Kaltemback, Dorin and Rahal 2007: 74). In addition, they have to be able to speak English or French “well enough to communicate with people” and applicants are

not required to take a special language test, since their knowledge of the language is tested indirectly through a test of knowledge about Canada (Nygren-Junkin 2009: 215). The test is usually written, but competence in either English or French is assessed both on the basis of the written part (testing the knowledge about Canada) and communication with the CIC¹⁶ staff¹⁷. However, it seems that more emphasis is placed on oral rather than on written skills (Nygren-Junkin 2009: 215). This approach to language testing can be compared with the language testing process in the United States, where, in addition to the civics test, applicants for citizenship are expected to take a special test designed to test different language skills, and where the process of testing is clearly stipulated. Knowledge of the country's political system aside, such language prerequisites in the Canadian naturalization process seem more than reasonable and attractive to most applicants. The fact that these requirements are relatively loose is evident in the practice of decision making in approving or denying the applications of those who experience problems with either of the two official languages. Namely, the judges who are responsible for evaluating the criteria for approving citizenship are frequently "extremely lenient on the language and national knowledge criteria"; and these cases prove that "lack of knowledge of an official language is not really a barrier to citizenship and many people who are not functionally fluent in an official language have been granted citizenship" (Burnaby 1996: 188). In other words, inadequate fluency has rarely been used as a strong exclusive instrument in the process of immigrants acquiring Canadian citizenship.

In addition to taking into account written language performance, language abilities in either English or French are assessed by the CIC staff. Special attention is paid to applicants' "ability to understand basic spoken statements and questions", as well as to their "ability to communicate basic information or respond to questions". As an applicant, you are expected to:

answer simple questions on familiar topics, using short sentences; show that you know enough words for basic everyday communication; tell a simple story about everyday activities; speak about something you did in the past (or will do in the future); give simple everyday instructions and directions; and express satisfaction or dissatisfaction¹⁸.

In terms of availability of materials for the preparation for the test, citizenship applicants have at their disposal a study guide entitled "Discover Canada: The Rights and Responsibilities of Citizenship"¹⁹.

On the basis of the information gathered from the official web pages of Citizenship and Immigration Canada, we may assert that the language requirements are placed before citizenship applicants for the

primary purpose of their most successful integration in the Canadian multicultural community. This is attested not only by the fact that applicants have at their disposal all the necessary materials for preparing for the test, but also by the fact that the Canadian government provides help in the integration process, which includes classes for learning English. The help is substantial and represents evidence of Canada's "official multiculturalism policy", especially in comparison to similar help provided for immigrants in the United States which is also elaborate, but not to such an extent as the one in Canada (Bloemraad 2006: 2).

3.3. Citizenship and language requirements in Australia

There are two years in Australian history which are emphasized as crucial in determining Australian citizenship through efforts to move away from its long-standing relation to the British identity. They are 1948 and 1984²⁰. In accordance with the *Nationality and Citizenship Act* passed in 1948²¹ and the creation of the notion of "Australian citizen and British subject", Australians started being regarded as Australian citizens from 1949, and starting from 1984, "Australians were no longer British subjects but, instead, Australian subjects" (Haynes 2009: 51)²². The first half of the 20th century represents a crucial period in the history of Australian citizenship which can be divided into the period before and after the *Nationality and Citizenship Act* of 1948. The importance of the Act is confirmed by the "truncated version of Australian citizenship", according to which the earlier period of subjection of citizenship to the British is viewed as "a shadowy and distasteful prelude to more wholesome modern developments" (Galligan and Roberts 2004: 9).

According to the 2004 DIMIA²³ data, Australian policy towards designing the criteria for granting citizenship has undergone many changes with an increasingly pronounced orientation towards "a more inclusive approach to the acquisition of Australian citizenship" (Australian Bureau of Statistics 2006: 145). Although such changes have become especially prominent in recent times, it does not mean that they were not present throughout the second half of the 20th century as well. Quite the contrary, the massive immigrant inflows which started towards the end of the 1940s forced Australian policy makers early on to constantly readdress and modify their policies towards immigrants and their languages. The *White Australia Policy*, very much present at the beginning of the 20th century, has been a matter of frequent debates in relation to the concept of Australian citizenship. The peculiarity of this policy lies precisely in the ways in which language was used to discriminate and exclude non-white immigrants. In that period language was used (or abused) as an extreme and absolute instrument of exclusion.

The language test was administered in form of “dictation in a language that the undesirable immigrant did not speak, thereby ensuring failure on the test”. Also, “(...); passages for dictation were changed every two weeks and were available in a number of European languages” (McNamara 2009: 224-225). Throughout the second half of the 20th and in the first decades of the 21st century Australia has placed focus on the notion of “assimilation rather than exclusion” (Kalantzis 2000: 103), primarily because numerous incoming ethnic and linguistic minorities would have made the functioning of the nation less effective without “policies and practices that pointed in the direction of civic pluralism” (Kalantzis 2000: 103). More specifically, the period from the late 1980s and especially in the 1990s in Australian language policy is marked by “the advocacy for the teaching of key Asian languages” (Djité 2011: 56). In the analysis of the notion of “Asianism” in Australian language policy, Lo Bianco (2003: 25) identifies an “economically motivated Asian regionalism” and states that “Asianism has been a successful phase of language education policy, resulting in vast public investments in the teaching of Asian languages and in infusing Asian cultural and historical perspectives across the curriculum of mainstream schools”²⁴.

Naturally, situations of policies of absolute inclusion are extremely hard to identify (if they exist at all). As is usually the case with similar dichotomies, the Australian exclusion-inclusion dichotomy in relation to immigrants and their rights is mostly a question of degree. The existence of the policy of exclusion is implicitly evident in frequently occurring cases in which immigrants refuse to get an Australian passport. This usually happens when immigrants, whose country of origin or previous residence does not have a dual nationality agreement with Australia, would as a result be required to give up their previously held citizenship (Veltman 2000: 73). The economic factor has become prominent in the structuring of Australian immigration policy in recent decades, especially when compared to the past restrictionist approach. This might be reflected in Australia’s current prerequisites for citizenship grants, including the language requirements.

Australian citizenship can be acquired through birth, adoption, descent, and through grant. Section 13 of the *Australian Citizenship Act* of 1948 includes the necessary prerequisites for acquiring citizenship via naturalization or grant. Applicants have to be permanent residents; they have to have reached the age of eighteen; they have to understand the nature of the application; they have to have been living in Australia as a permanent resident for a period totalling not less than one year during a period of two years immediately preceding the date that the application was submitted; they have to have been living as a permanent resident in Australia for a period or periods of not less than two years during a period of five years immediately preceding the date that the application was submitted; they have to be of good character; they must have a basic

knowledge of English²⁵; and they have to have adequate knowledge of the responsibilities and privileges of Australian citizenship. (Zappalà and Castles 2000: 43-45).

What primarily concerns us here is the acquisition of Australian citizenship via the process of naturalization with special emphasis on language requirements framed within the overall requirements for its acquisition. Due to the aforementioned frequent legal amendments and changes in the policy towards immigrant communities, acquiring Australian citizenship through the process of naturalization seems relatively easy to achieve, especially in comparison to citizenship requirements of other countries (Irving 2004: 15-16). The changes made to the *Australian Citizenship Act* in 1984 undoubtedly contributed significantly to perceptions of a relatively easy acquisition of the citizenship. A person applying for the naturalization process had to meet only two criteria – “two years of residence and a basic knowledge of English” (Davidson 1997: 118). Prior to these changes, non-British immigrants to Australia had been subjected to discrimination in comparison to British immigrants in relation to acquiring Australian citizenship. Among other elements of discrimination, non-British immigrants were required to have a five-year residence and British immigrants only a one-year residence in Australia to be able to apply for citizenship (Zappalà and Castles 2000: 38). Such discrimination points to Australia’s historical shift from the inclination towards *jus sanguinis* to an inclination towards *jus soli*.

Although the change from claiming allegiance to the British Queen to claiming it to Australia is truly a significant one, it is much more symbolic in comparison to other changes introduced in 1984. This primarily refers to language requirements, which became more relaxed than before (Castles and Vasta 2004: 158). The relaxation is mostly evident in the fact that the applicants who were required to know “basic” English (those younger than fifty years of age) only had to demonstrate their ability to speak and understand, but not read and write it. In cases of spouses applying together for Australian citizenship, only one of them was required to know English, and those undergoing the naturalization process and having problems with the language were encouraged to attend English classes offered to them. Therefore, throughout the 1980s and well into the 1990s, the relaxation of the language requirement had as its consequence the fact that “(...) the traditional marker of ‘belonging’, knowledge of the official national language, had been so diluted that it could no longer be regarded as such. Language had been reduced from an affective to an instrumental status” (Davidson 1997: 119-120). Changes in the language requirement had substantial practical consequences in terms of the standard of the knowledge of English (level of proficiency) which needed to be met. This certainly made the application for Australian citizenship more attractive for those who were struggling

with the language barrier. However, as is the case with the changes in the oath requirement, these changes were also highly symbolic as more focus was placed on the ability of immigrants to function productively in mainstream society, rather than on their statement of belonging to the nation (which higher levels of required competence in English, as the official national language, might have implied).

Current information and instructions on how to successfully go through the naturalization process also show that the language requirement is relatively lax. According to the information on the official web pages of Australian Government's Department of Immigration and Citizenship, the objective of the citizenship test listed first is "to assess whether you have an adequate knowledge of Australia and the responsibilities and privileges of Australian citizenship". In addition, it states that an additional objective (listed second)²⁶ is "to assess whether you have a basic knowledge of the English language". What follows is an emphasis on the fact that English is the national language. This might imply that the importance of English lies largely in the fact that it is indeed the national language of Australia, which would resemble the 19th century equation of one language – one nation. However, this is clearly not so, not only because of an increasing number of minorities and their languages, but also because the benefits of knowledge of English are also clearly stipulated in what follows on the web page: "Communicating in English helps you to play a more active role in Australian society. It helps you to take full advantage of education, employment and the other opportunities Australia has to offer"²⁷. In addition, eligible applicants have the possibility of preparing for the test by using the Australian citizenship test resource containing 20 practice questions related to Australia's people, laws and government organization²⁸.

On the basis of the information gathered from the official web pages of the Australian Government's Department of Immigration and Citizenship, we may assert that the language requirements have diachronically become more lax and that special attention is paid to potential applicants having all the materials necessary for the preparation for the test at their disposal. Australia's language requirements appear relatively lax not only diachronically, but comparatively as well. In comparison to the United States' and Canada's language prerequisites, i.e. language testing in the naturalization process, and similarly to New Zealand's framework, the current policy in Australia appears to be less restrictive. Therefore, the analysis of Australia's language requirements in the naturalization process implies that most emphasis is placed on respecting the overall cultural complexity and the ability of applicants to function effectively within such a complex web of diversity²⁹. Diachronically, the analysis of language requirements in Australian naturalization processes proves that citizenship has drastically changed from an exclusive to an inclusive category.

3.4. Citizenship and language requirements in New Zealand

The two crucial New Zealand acts regulating citizenship status were also passed in the first half and the second half of the twentieth century. As was the case in Australia, the first relevant year was 1948, when the notion of New Zealand citizenship was first created via the *British Nationality and New Zealand Citizenship Act*. However, unlike other countries, such as the United States, which relatively successfully and, compared to New Zealand, early on developed its own sense of national identity, New Zealand of the time was somewhat hesitant to do the same and intensify attempts to break free from the image of British dominion (Pearson 2005: 26, 28). In that period, New Zealand immigration and citizenship grant policies were very similar to those of other British dominions, especially Australia. Such policies primarily referred to using various ways to exclude immigrants of Asian origin. In the process, language requirements were, among other things, enforced as a strong means of keeping immigrants of that particular origin out. The policies were not completely identical. While Australia of the time insisted mostly on a ‘Whites Only’ policy, New Zealand’s approach at the time was more restrictive, as it was additionally characterized by a ‘British Only’ policy. The second crucial document was passed in 1977. The *Citizenship Act* marked the beginning of the end of the ‘British Only’ policy. The act was crucial because it abolished the previous equal treatment of British persons who were born in New Zealand and other British persons, who were from then on treated the same as persons of ancestries other than British – as ‘aliens’ (Pearson 2005: 28; McMillan 2004: 279). Despite the long-standing British legacy, New Zealand seems to have adopted a shift from viewing citizenship as an instrument of exclusion to an instrument of inclusion. Partly due to the specific historical treatment of the Māori in terms of the recent, more developed “bicultural identity”, and partly because of pressing economic and political demands (Mutch 2008: 198), New Zealand citizenship policy has come a far way not only in terms of an inclusive policy towards Asian immigrants, but also towards all persons who apply for naturalization and are willing to participate in the successful economic developments of the country. However, on the basis of the last available 2001 Census data, Starks, Harlow and Bell (2005: 25) conclude that the data present New Zealand “as a monolingual nation, where English prevails, where Māori is struggling and where languages other than English are restricted to their particular ethnic group”. Such perceptions of New Zealand as a predominantly monolingual country in which immigrant minority languages are not adequately promoted is consistent with the views of the ways in which New Zealand language policy has been structured. The Māori language was declared official in

1987 with the *Māori Language Act*. Revitalization of Māori has been most evident in the educational system, especially throughout the last two decades of the twentieth century when “formal education through the medium of Māori was greatly expanded” (Benton 2007: 171). Although significant efforts have been made to promote the use and status of Māori as a valuable cultural and linguistic asset, there is still much work to be done in promoting multilingualism, especially with regard to minority languages. Focusing on the status of languages other than English, Benton (2007: 172) states that “the country’s immigration regulations give no indication that any language other than English is valued, officially or otherwise”. Accordingly, there seems to be “no clear comprehensive languages policy in New Zealand” (Peddie 1997: 132), despite the significant economic demands that “lie behind the recent calls for international languages of trade and tourism” (Peddie 1997: 143)³⁰. This can be contrasted with the situation in Australia where “language planning and language-in-education planning have become remarkably well accepted”, and where “language policy is now an accepted part of public discourse” (Lo Bianco 1997: 117). In this sense, the development of New Zealand’s elaborated language policy seems to be lagging behind Australia’s development of a more explicit language policy, despite the fact that both countries have been faced with the indisputable demands of economic factors. However, despite such deficiencies, it has also been noted that “New Zealand society has become more aware of its increasingly multilingual nature, of the shifts in language use of various sections of the population, and of the necessity for appropriate language planning in order to accommodate these changes” (Starks and Barkhuizen 2003: 248).

Information available on the web site of New Zealand’s Department of Internal Affairs states that the requirements to be granted New Zealand citizenship are the following: the person has to intend to continue to reside in New Zealand; has to be able to understand and speak English; has to be of good character; has to understand the responsibilities and privileges of New Zealand citizenship; has to have been a New Zealand resident for five years. Concerning the language requirements, the same web page states that the person must have “sufficient knowledge of the English language”. The requirement is assessed in the way that the applicant must be ready to demonstrate the ability “to manage independently in everyday situations”. What is more, meeting the language requirement also includes looking at the applicant’s level of education, nature of employment and face-to-face communication with the Citizenship Office. The most interesting part of the information concerning the language requirement is that applicants may be required to attend an English language interview³¹. Although the Citizenship Office “reserves the right to interview all applicants”, most of the persons applying for New Zealand citizenship “**will not** be interviewed

as part of the citizenship process”³². In comparison to information found on Australian Government’s Department of Immigration and Citizenship, New Zealand’s Department of Internal Affairs does not explicitly emphasize the fact that English is the national language, nor does it mention the benefits of the knowledge of English. However, the most surprising difference lies in the fact that applicants for New Zealand citizenship are usually not interviewed with the purpose of testing their English competence (as this competence is mostly assessed via any face-to-face communication with the Citizenship Office).

Although some positive changes have occurred in the context of “language services”, i.e. provision of help for people who have difficulties with English, this aspect of promoting New Zealand’s developing multilingual facet is still largely underdeveloped. Such lack of provision of help is evident in different areas. Although there have been some positive developments in the areas of translation, interpreting and publication of materials in languages other than English, there is significant work to be done in the areas of availability of English language teaching programs and materials on New Zealand radio and TV, and in the libraries (Peddie 1997: 130-131).

In comparison to the United States’ and Canada’s language prerequisites, i.e. language testing in the naturalization process, the current policy in New Zealand appears to be less restrictive. As stated above, in the past New Zealand enforced a more restrictive, ‘British Only’ immigrant exclusion policy in comparison to Australia’s ‘Whites Only’ immigrant exclusion policy of the time. Current information related to citizenship prerequisites in the two countries is therefore the more surprising, as it points to the fact that, in terms of language requirements, New Zealand’s practice in naturalization processes is more lax than Australia’s. Such an analysis of language prerequisites points to the fact that both countries’ current understandings of the concept of citizenship correspond to it being viewed not as an instrument of exclusion, but rather as an instrument of inclusion; even more so in the case of New Zealand.

4. Conclusions

The aim of this paper is to present both a diachronic and a synchronic comparative analysis of language requirements in naturalization processes in the United States, Canada, Australia, and New Zealand, and to relate such findings to a common socio-historical background specific for these countries and their language policies as reflected in the language requirements for obtaining citizenship. The common socio-historical background of the four countries has been identified not only in their colonial heritage, but also in similar policies towards immigration. This is especially evident in the analysis of racially-based

restrictions of immigration in the second half of the twentieth century. Taking into consideration their colonial past, their current status as the most prominent immigration countries, and their past and current language policies, as reflected in language requirements in naturalization processes, there are significant similarities (primarily similar wording of the language requirement and availability of materials for the preparation for the tests), but also some differences.

Current language requirements in the naturalization process in the United States reflect the most widely debated issues of language policy in the country. Opposed to the linguistic pluralists' arguments, assimilationist practices in the United States, that became very explicit in the 1980s with the English-only movement, seem to have been rather successful. The presented language requirements in the naturalization process in the United States seem fairly demanding as all four language skills are tested via a separate language test. The procedure for each part of the test is presented in detail, and emphasis is placed on the importance of passing the language test in the naturalization process, but also on the ability of understanding the rights and duties of being a citizen of the United States.

Similar to the explicit explanation of the types of English language tests in the naturalization process in the United States, the naturalization process in Canada also makes detailed and explicit reference to types of successful English or French language performance which are expected from applicants. However, unlike the United States language policy which is more focused on the single majority group and on ways of negotiating its dominance in relation to the growing number of minority groups, Canadian language policy is primarily concerned with balancing the status of English and French, despite the country's increasing multilingualism. The purpose of ensuring sufficient language competence in English or French is successful integration. This is evident in substantial help provided in the form of language courses for those who might experience problems with learning the language.

Although Australia imposed strict language requirements on immigrants at the beginning of the twentieth century, the policy changed towards the end of the century. Significant acknowledgment of the economic factor marked the process of constructing the current, fairly inclusive Australian immigration policy, especially towards immigrants of Asian origin. Current immigration policy has led to an increased awareness of the presence of immigrants in education, which can also be analyzed within the context of language requirements in the naturalization process. The inclusive character of both the immigration and language policy is evident in fewer English language skills being tested, but also in other markers of the changing policy, such as the stipulation of reasons why the knowledge of English is so important – for the successful functioning in the majority English-speaking

community and for a better understanding of the organization of Australia's government.

Taking into consideration New Zealand's past policy towards accepting immigrants, which was even more restrictive than Australia's, New Zealand's changes in language policy in the context of language requirements in the naturalization process represent an even more drastic move from citizenship regarded as an instrument of exclusion to it being regarded as an instrument of inclusion. This is evident in the formulation of 'how much' English is considered sufficient for a person to become eligible for New Zealand citizenship, as well as in other language-related elements of the naturalization process, such as the fact that there is no explicit mention of reasons why the knowledge of English is so important. However, current trends in New Zealand's language policy point to a need for a more comprehensive language policy that would place more focus on the country's increasing multilingualism.

On the basis of the presented data concerning language requirements in naturalization processes, it is possible to discuss the relatively recent changes of language policies in major immigration countries which are bound by a common colonial heritage. Since citizenship can be regarded both as an instrument of exclusion and inclusion, conclusions can be drawn in terms of whether the exclusive or the inclusive element is more dominant in a particular sociolinguistic context. Taking into consideration the current language requirements, other language-related elements in naturalization processes, and the changing language policies, it is possible to conclude that, regardless of the differences in the extent, all of the four major immigration countries demonstrate a substantial move towards a view of their citizenship as a predominantly inclusive concept.

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Notes

- ¹ Language classes helping immigrants learn the main language of the host country may be taken into consideration in the investigation of immigrants' identities. Analyzing "identity in adult migrant contexts", Block (2007: 75-111) emphasizes the importance of host communities in immigrants' second language learning.
- ² There is a substantial body of literature on the relationship between language and globalization and on English as a global lingua franca. See, for example, Blommaert (2010) about "the sociolinguistics of globalization", but also Pennycook (2007) about "global Englishes and transcultural flows" and House (2008) about "English as lingua franca in Europe today".
- ³ See, for example, Joseph (2004: 92-131) about the relationship between language and national identities.

- ⁴ According to Janoski (2010: 105), “conservative parties were the most instrumental in passing Chinese exclusion acts in the United States under a Republican president (1882), in Canada under a Conservative premier (1885), in New Zealand under the Liberal Party (1899), and in Australia under the Protectionist Party (1901)”.
- ⁵ See Janoski (2010: 96) about the comparison of minimum residency periods in applications for citizenship in the United States, Canada, Australia, and New Zealand.
- ⁶ See Gyory (1998) about the socio-political context of the Chinese Exclusion Act.
- ⁷ The “anatomy of the English-only movement” is analyzed in Crawford (2000: 4-30). For further elaboration of the movement see Baker (2011: 384-387) and Dueñas González and Melis, eds. (2001).
- ⁸ USCIS.
- ⁹ <<http://www.uscis.gov/files/article/M-476.pdf>>.
- ¹⁰ N-400 is a form which needs to be filled out when applying for US citizenship. It consists of 14 parts. The form can be found on the following USCIS webpage: <<http://www.uscis.gov/portal/site/uscis/menuitem.5af9bb95919f35e66f614176543f6d1a/?vgnnextoid=480ccac09aa5d010VgnVCM10000048f3d6a1RCRD&vgnnextchannel=db029c7755cb9010VgnVCM10000045f3d6a1RCRD>>. For instructions on how the form should be filled out, see: <<http://www.uscis.gov/files/form/n-400instr.pdf>>.
- ¹¹ <<http://www.uscis.gov/portal/site/uscis/menuitem.749cabd81f5ffc8fba713d10526e0aa0/?vgnnextoid=5efcebb7d4ff8210VgnVCM10000025e6a00aRCRD&vgnnextchannel=5efcebb7d4ff8210VgnVCM10000025e6a00aRCRD>>.
- ¹² <http://www.uscis.gov/portal/site/uscis/menuitem.749cabd81f5ffc8fba713d10526e0aa0/?vgnnextoid=b51777f48e73a210VgnVCM100000b92ca60aRCRD&vgnnextchannel=4982df6bdd42a210VgnVCM100000b92ca60aRCRD>.
- ¹³ For an account of “the history and racism in Canada” see the insightful contributions in Walker, ed. (2008). See also Brown (1996), James (1999) and Roy (2007) about Canada’s past citizenship policy towards immigrants of Asian origin.
- ¹⁴ See Hawkins (1988) about the overview of immigration to Canada in the period from the end of Second World War to the 1970s.
- ¹⁵ For a more comprehensive insight into the similarities and differences between the United States and Canadian language policies see Ricento and Burnaby (eds.) 1998. *Language and Politics in the United States and Canada: Myths and Realities*, especially the contributions by Roderic Beaujot, Thomas Ricento and Barbara Burnaby.
- ¹⁶ Citizenship and Immigration Canada.
- ¹⁷ Persons between the ages of 18 and 54 are required to take the test (see: <<http://www.cic.gc.ca/english/citizenship/cit-test.asp#about>>).
- ¹⁸ <<http://www.cic.gc.ca/english/citizenship/become-eligibility.asp#language>>.
- ¹⁹ <<http://www.cic.gc.ca/english/resources/publications/discover/index.asp>>.
- ²⁰ There was also the 1969 change, when the *Nationality and Citizenship Act* was renamed the *Citizenship Act*, according to which “Australian citizens ceased to be British subjects instead retaining only the *status of* British subjects” (Dutton, 2002: 17). However, this change seems minor, especially in comparison to the 1948 and 1984 Acts.
- ²¹ Nowadays known as the *Australian Citizenship Act 1948* (Eddy, 2001: 762).
- ²² There was also an additional change that occurred in 1976 when Australian citizens were no longer “required to record their nationality as British” on the census (Dutton, 2002: 16).
- ²³ Department of Immigration and Multicultural and Indigenous Affairs.
- ²⁴ See also Lo Bianco and Slaughter (2009) about emphasis placed on particular Asian languages within the context of Australian education policy.
- ²⁵ Australian Citizenship Act, 1948. 13(1)g. This requirement does not apply to those aged fifty years or more, or whose ability is affected by a physical or intellectual impairment.
- ²⁶ Although “a basic knowledge of the English language” is listed first as the objective in the “Do I need to sit the citizenship test?” section (compare <http://www.citizenship.gov.au/learn/cit_test/> and <http://www.citizenship.gov.au/learn/cit_test/need_sit_test/>).

- ²⁷ <http://www.citizenship.gov.au/learn/cit_test/>.
- ²⁸ <http://www.citizenship.gov.au/learn/cit_test/test_resource/>.
- ²⁹ See Galligan and Roberts (2004: 16) about the concept of citizenship regarded as an expression of citizens belonging “to a larger community with a specific cultural heritage that is valued and shared”.
- ³⁰ See Starks and Barkhuizen (2003: 247-248) on reasons why “New Zealand does not have a *national* language policy”.
- ³¹ <<http://www.dia.govt.nz/Services-Citizenship-General-Requirements-for-a-Grant-of-New-Zealand-Citizenship#two>>.
- ³² <http://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Services-Citizenship-Citizenship-by-Grant-Frequently-Asked-Questions?OpenDocument#three>.

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