

Brexit and the stratified uses of national and European Union citizenship

Last version established before publisher editing – for the final version please see <https://doi.org/10.1177%2F00113921211048523>

Reuse is restricted to non-commercial and no derivative uses

Abstract

In this article we explore how Brexit changes the social meanings and uses of formal national and EU citizenship and how these meanings and uses are stratified, including by migratory experience, class and age. We do so through in-depth interviews with Britons in Belgium, EU27 citizens ‘by birth’ residing in the UK, and Bangladeshis who naturalised in Italy before moving to the UK. We highlight the differences both between the three groups and within the groups, along lines of class and age, in the expectations regarding rights linked to citizenship, in the salience of different rights (eg freedom of movement, access to welfare, voting), and in the availability of alternative resources to contain the impact of Brexit. We argue that the Brexit process not only highlights the value of citizenship as well as the added value of a citizenship of an EU member state, but that it also reveals how the value of citizenships is internally stratified.

Keywords

Citizenship, European Union, Brexit, naturalisation, migration

Djordje Sredanovic and Francesco Della Puppa

Djordje Sredanovic, F.R.S.-FRNS/GERME/Université Libre de Bruxelles

djordje.sredanovic@ulb.be

GERME, Avenue Jeanne, 44 CP 124

B-1050 Brussels (BELGIUM)

(+44)07596382948

Francesco Della Puppa, Università Ca' Foscari di Venezia

Francesco.dellapuppa@unive.it

Dipartimento di Filosofia e Beni Culturali, Palazzo Malcanton Marcorà, Dorsoduro

3484/D 30123 Venezia, Italia.

Introduction

In this article we explore how Brexit changes the uses of EU and national citizenships, and the way in which it highlights how formal, legal citizenships have different values according to the social position of citizens (or aspiring citizens), including their ethnicity, migratory experience, class, age, and family networks.

Citizenship has been analysed as a source of inequality, showing how the early

development of formal citizenship has been accompanied by exclusion along gender and racial lines (Boatcă and Roth, 2016), how international inequality characterises citizenship as a property defining unequal opportunities (Schachar, 2007), as well as the commodification of citizenship through naturalisation-through-investment schemes (Boatcă and Roth, 2016). Such considerations can be linked to larger analyses of global inequalities along class, racial and colonial lines. Not only the development of dominant countries is based on the dependency of peripheral countries, but historically the relative decrease in inequality in dominant countries has been linked to the increase in inequality in peripheral ones (Bashi Treitler and Boatcă, 2016). Some of the literature exploring global citizenship inequalities has discussed the reasons for naturalising, focusing on issues such as the global hierarchy of passports and the accumulation of mobility capital (Harpaz and Mateos, 2019). While important, such approach however does not account for more fine-grained motivations, as it risks ignoring how citizenship increases capacity for settlement *and* for mobility (Della Puppa and Sredanovic, 2017), as well as obscuring intra-national inequalities and how the value of citizenship and the reasons to naturalise can be contingent on specific events (such as Brexit - Sredanovic, 2020a).

A second body of literature has focused on the multiple uses of citizenship. The traditional vision of naturalisation – which is still promoted by many governments – sees it as a completion of a process of settlement, integration and identification, and

transformation into an active member of the community holding full rights, and in particular full political rights. Qualitative studies of reasons for naturalising have shown that naturalisations are also linked to specific practical goals, including full protection against immigration control and deportation, full social and political rights, and mobility (eg Ruget and Usmanalieva, 2010; Sredanovic, 2014; Sredanovic and Della Puppa, 2017; Della Puppa and King, 2019). Such literature, however, has usually focused either methodologically on homogeneous groups of migrants or analytically on similar uses of citizenship across different groups. In this article we underline on the contrary how the uses of citizenship itself are differentiated internally along lines such as class, migratory background and age, a dimension that has been explored only in a limited number of studies. Among these, Surak (2021) looked at mobility and business opportunities as specific uses of citizenship among millionaires who pursue naturalisation by investment, while Mateos (2019) underlined the different uses of dual citizenship in Mexico between those of European descent pursuing EU citizenship in Mexico by ancestry and those more likely to migrate to the US and apply for citizenship there. Other dimensions of citizenship that have been studied in their stratification include the sense of legitimacy – with some European migrants in the UK presenting themselves as worthy of citizenship in opposition to non-European migrants (McGhee et al., 2018; Monforte et al., 2019) – and the sense of belonging linked to citizenship in Norway, with citizens by birth giving less thought to citizenship, and non-white migrants giving more

significance to formal citizenship as a dimension of belonging to the country (Erdal et al., 2018).

The post-national approach argues that the relevance of national citizenship is diminishing, either because of the strengthening of human rights and rights linked to permanent residence (Soysal, 1994) or because of the rise of non-national citizenships, such as EU citizenship (Sassen, 2002). However, theories such as these have been criticised as overestimating the strength of both human rights and EU-related rights (Hansen, 2009), underlining in particular how EU citizenship only exists as a status derived from the national citizenships of the member states. The specific relevance of EU citizenship is another issue we explore in this article. EU citizenship is inherently stratifying, as EU migrants hold less rights than citizens, but more than non-EU migrants, and a significant body of research (Urzi and Williams, 2017) has pointed to the EU premium, the rights and advantages that come with the citizenship of any EU member state. In this article we explore both the usefulness of EU citizenship in the context of Brexit, which represents one of the major crises for the institution, and more generally what Brexit can tell us about stratification within EU citizenship.

The Brexit context

Brexit is an unfortunate opportunity to examine the specific value of national and EU

citizenships. Theoretically speaking, Brexit reduces the value of British citizenship – as the rights linked to EU citizenship were lost on January 31st 2020 – as well as of EU citizenship and of the citizenships of EU27 member states – as the rights linked to those citizenships will be limited in the UK. At the same time, Brexit *increases* the value of British citizenship for EU27 citizens in the UK, and of the citizenships of EU member states for Britons, as these citizenships allow citizens to recover some of the rights lost with Brexit. While a minority of EU member states do not tolerate multiple citizenship, Belgium, the UK, Italy and Bangladesh have no limitations in this sense, which means that for almost all the interviewees naturalisation did not imply the loss of the citizenship of birth.

One of the aims of this article is to explore the degree to which these perspectives on the value of different citizenships are shared by the populations affected by Brexit. Brexit has been analysed as both in continuity and exacerbating structural inequalities in migration and economic relations between different EU member states, as well as inequalities along lines of class, and different forms of racialisation, in the migrations to the UK (Antonucci and Varriale, 2020). Moreover, research has highlighted the continuity between the withdrawal of rights enacted by Brexit and earlier withdrawals of rights targeting (former) British colonial subjects (Prabhat 2019), and how Brexit has an impact beyond the conventional boundaries of Europe, for example introducing a hard border between UK and French and Dutch territories in the Caribbean (Boatcă,

2021).

The groups affected by Brexit had, and continue to have, worries about their right to stay, work and move (Sigona and Godin 2019; Benson, 2020; Brahic and Lallement, 2020; Sredanovic and Della Puppa, 2020; Sredanovic, 2020b). In the UK there are further worries about the economy (Sredanovic, 2020b) and the rise of xenophobia (Lulle et al., 2019; Rzepinkowska, 2019). Such fears are also stratified, as white Britons in the EU often feel othered for the first time (Benson, 2020), while Britons of colour feel a continuity with pre-referendum forms of othering (Benson and Lewis, 2020). Similarly, Eastern Europeans in the UK are more likely to have had pre-referendum experiences of xenophobia than West Europeans (Rzepinkowska, 2019; Brahic and Lallement, 2020). Lulle et al. (2018) make a more specific link to the length of time a group has had rights of movement in the UK, with their Irish interviewees feeling safer than the Italian ones, who in turn felt safer than the Romanian ones.

Attitudes towards naturalisation among EU27 citizens in the UK also seem to be stratified: Moreh, McGhee and Vlachantoni show a stronger orientation towards naturalisation (rather than further migration) among Eastern Europeans, those who had resided in the UK for a shorter time, and those with children (Moreh et al., 2020 – see also McGhee et al., 2019). Meanwhile, Lulle et al. (2019) show a class stratification, with those with fewer resources seeing less chances both to naturalise and to migrate further.

In our previous research (Sredanovic and Della Puppa, 2020) we have shown different orientations to mobility according to class and between EU27 citizens ‘by birth’ in the UK and those who had naturalised to become EU citizens before moving to the UK. Those of a lower social class and those with a migratory experience as non-EU citizens had less expectations about the EU freedom of movement and were less likely to plan an onward migration to another EU member state (Della Puppa et al., 2021). In this article, we look at how the uses of citizenship – both national and EU – are stratified along these and other dimensions.

In the next paragraph we present our methods; we then present the experience of Britons in Belgium, EU27 citizens ‘by birth’ in the UK, and Bangladeshis who naturalised in Italy before moving to the UK.

Methods

This article is based on two distinct research projects. The first project, started in 2018 and still ongoing, is conducted by Sredanovic and includes in-depth interviews with EU27 citizens in the UK and British citizens in Belgium. At the moment 31 EU27 citizens and 16 British citizens have been interviewed. The interviewees were contacted through social media (posts on Facebook groups and on Twitter) and through the snowball procedure, and lived in different areas across Great Britain and Belgium. The

group of EU27 citizens includes more women than men (21 versus 10), are all in their 20s to their 40s, and the group is skewed towards the middle class. All interviewees except one are white and all but one were citizens by birth. Their countries of origin include Italy (seven interviewees), Spain (five), Croatia and Poland (four from each), France and Germany (three from each), Greece (two), and Austria, Belgium and Hungary (one from each). The British citizens interviewed in Belgium are balanced by gender, range between their 20s and their 70s, and are also prevalently middle class (which reflects the overall composition of the population, given the concentration of middle class professionals working directly or indirectly with EU institutions). Only one interviewee was British by naturalisation, but several had parents with a migratory background.

The second project involved Italian-Bangladeshis in London and was conducted in 2015-17 by Della Puppa. This research project consisted of 30 in-depth narrative interviews with Italian-Bangladeshis living in the London and Essex area. Respondents were accessed mainly by snowballing. Some respondents were contacted via key informants and the networks of various Italian-Bangladeshi associations in both Italy and London. All interviews were with male heads of nuclear households, aged in their 30s to 50s and who had lived in Italy for at least 15 years. They belonged to the educated middle class of Bangladeshi society, but in Italy they had worked mainly as factory workers, while in London they were mainly employed as mini-cab drivers,

security guards and dishwashers in restaurants. All the names used are pseudonyms.

While the two projects have been conducted separately by the two authors, we have a long-term collaboration on the themes of citizenship and mobility (Della Puppa and Sredanovic, 2017) and have developed common theoretical concepts applied in both the projects. Our analysis focuses on three groups – British citizens in Belgium, EU27 citizens in the UK and Italian-Bangladeshis in the UK – to show how, within the Brexit context, the different meanings and values linked to national and EU citizenship relate to stratified uses of citizenship. Such analysis goes beyond the focus on a single group or geographic area to show how people are unevenly positioned in relation to the securities and protections of citizenship – or lack thereof.

Class and citizenship

Migrants can have dissonant class positions both across the migratory career (Martiniello and Rea, 2014) and in different (national) contexts (Rye, 2019). Here we consider both the class position in the (main) context of residence and the class positions the interviewees felt they could occupy elsewhere in the UK/EU space. Further, three different dimensions of class are relevant for our analysis. Holding recognised professional skills emerged as relevant in the degree of security different interviewees showed about maintaining their economic status post-Brexit. Available

income made access to welfare more or less important for different groups of interviewees. Finally, class habitus in the sense of Bourdieu (1979) involved different expectations regarding rights that different interviewees expected to enjoy or obtain from naturalisation.

The Britons interviewed in Belgium and the EU27 citizens by birth in the UK had mostly profiles linked to the circulation of professionals within the EU. For some, especially the younger EU27 citizens by birth, the migration was a passage from precarious conditions in the country of origin to a better condition, but still characterised by precariousness and often overqualification, in the UK. The Italian-Bangladeshis in the UK belonged to the middle and middle-upper class in their country of origin and, in fact, the motivations at the basis of their onward migration – especially the search for opportunities for social mobility for their children – are shaped by their original class habitus. That is, Bangladeshi migration to Europe is seen as one of the few opportunities to reactivate the upward social mobility that has been blocked by recent socio-political events in Bangladesh. In spite of that, the South-North geographical mobility implies a social mobility from middle-upper class to working class. Therefore, in Europe, these migrants want to make their children recover their original social position.

Britons in Europe

Following the beginning of the Brexit process, all of the British citizens interviewed in Belgium were afraid of losing at least some of their rights, and most of them had applied (or were exploring applying) for the citizenship of an EU member state.

Some of the interviewees expressed doubts about the prospect of enjoying residence rights in Belgium:

For me personally I... I was concerned that at some point... I might have to leave Belgium. And that I would no longer have the right to live and to work in Belgium as I do now, so, yeah, that was the fear that I had, that I had to go back to the UK. (Kelly, British/naturalised Belgian)

For Kelly and most of the other interviewees, however, such fears were limited to the months immediately after the referendum. During the Brexit process this worry became more limited to those whose work was more strictly linked to their EU citizenship, including not only those working directly for the EU, but also some interviewees practicing EU law or who worked in lobbying EU institutions.

Transnational family links, such as ageing parents living in the UK, or adult children who had moved there, were among the reasons to try to become dual nationals to retain mobility rights between Belgium and the UK (Sredanovic, 2020b). Assuring continued access to healthcare and pensions in both countries was a further reason for the

interviewees in their 50s and older to try to strengthen their legal status in both countries, although, in this case, there were also worries linked to future agreements on pensions between the UK and the EU, and principal residence requirements for access to healthcare.

While for some interviewees with a very long history in Belgium, or who had Belgian spouses, the nationality of Belgium had a value in itself, for most interviewees it was more important to retain their EU citizenship status, as can be shown from another extract of the interview with Kelly:

The other thing I was concerned about is: when the UK eventually leaves the EU, will I still be able to work in another EU country? [...] I wanted to make sure to be able to maybe go to other EU countries to work, but even just on holiday. I wanted things to be easy for me, so it was just about maintaining an EU citizenship, if you like, not necessarily Belgian, but still being part of the EU, that was important for me. (Kelly, British/naturalised Belgian)

Kelly's interest in moving elsewhere was also linked with her qualifications and work experience in field of language teaching. While she was among the youngest interviewees, aspirations to move elsewhere were common with interviewees of all ages. While Kelly applied for Belgian nationality, other interviewees indeed explored the citizenships of other EU member states, including Ireland, France, Italy and Germany,

on the basis of ancestry or marriage (cf. also Ferbrache 2019).

One of the main reasons EU citizenship in particular was highly valued was the right to move to and work in another EU member state, something that has never been included in the UK–EU negotiations. In addition to Kelly, William was interested in being able to retain the option of applying for a job in the Netherlands without needing a visa and without being considered only in absence of other, EU, applicants. For a number of interviewees the interest was for their children retaining access to the EU labour market. In the interview with Gordon and Mira, Brexit was represented as problematic especially for their daughters, who, although born in Belgium, had never applied for Belgian citizenship, and who at the moment of the referendum (and the interview) were in the UK for studies:

Gordon: ... the problem is for our children.

Mira: We'd just like to make sure they have, you know, the options, 'cause they've just finished university [...] but when they are looking for a job, you know, to be able to look for a job in Continental Europe as well as in the UK. (Gordon: British; Mira: Serbian/naturalised British)

William held, and Mira and Gordon had retired from, highly qualified jobs. For each of them the expectation of unlimited access to the European labour market can be linked to a class habitus in which access to qualified positions plays an important role. For one

interviewee, Sarah, the Irish passport she obtained after the referendum was further a way to keep open the possibility of lifestyle migration (i.e. migration motivated by specific quality of life aspects beyond economic improvement, such as cultural activities, sociability or climate) elsewhere in the EU. In some cases, however, other resources emerged in the interview as alternatives to citizenship to safeguard the life opportunities of the interviewees. Mira and Gordon, for example, while worried for their daughters, considered the fact that they had resided and paid taxes in Belgium for decades to be a sufficient guarantee, and awaited the end of the negotiations to decide if they would apply for Belgian citizenship. Arthur was an interviewee who offered a particularly detailed reflection on his situation:

The thing is, my next career move is not going to be into a completely generic role. [...] I have skills and knowledge that I think could allow me to move into a role a bit above a junior role. Which means that I would be then applying for jobs and roles and organisations and companies which would be quite specific. [...] And I think that if they would want me, they would be able to get around the paperwork. [...] I mean, for some role it might make a difference, maybe. But I don't think I would go for a role where they've got ... maybe 10,000 people applying for that role. (Arthur, British)

In Arthur's account, the priorities are reversed: the important aspect was not the right to work in the EU, but the effect that having or not having an EU passport has on one's

desirability in the labour market. Being highly qualified, he expected to be both appealing for specific jobs and to be able to count on his employers to overcome any bureaucratic obstacles. Arthur's expectation reminds us of Favell's (2008) analysis of 'Eurostars': young professionals who move within the EU and obtain advantageous positions in the EU labour market thanks to their professionally 'unique' profiles, although in Arthur's case EU citizenship appears less essential.

EU27 citizens 'by birth' in the United Kingdom

Similar to the interviewees in Belgium, a majority of the EU27 citizens by birth who Sredanovic interviewed in the UK were worried about the impact of Brexit. In contrast to the first group, in which an orientation to naturalise was prevalent, however, EU27 citizens by birth were divided between those who had applied for or intended to apply for British citizenship and those who were more ambivalent about the prospect.

Like the interviewees in Belgium, the EU27 citizens by birth also considered applying for naturalisation to safeguard their rights to stay and work in the UK; worries about the rise of xenophobia and the UK economy, however, meant that many naturalisation plans were also linked to a larger need for security.

In the view of how much I think Brexit was a very, very racist reaction to multicultural

society, or austerity [...] I just don't think that we can trust the government, especially the current [2018] one, with not actually taking it out on EU citizens. (Krisztina, Hungarian/naturalised British)

As with the interviewees in Belgium, the naturalisations had also the aim of safeguarding easy mobility between the UK and the EU, as well as further mobility with the possibility of returning to the UK (Sigona and Godin 2019).

[by becoming a British citizen] I am more reassured about being able to live here. But also I am more reassured that [...] if we [he and his wife] wanted to try some other experience, another country, then we could come back here.

[...]

If we travel, go back, I don't want to be stuck in a different queue. (Bruno, Italian/naturalised British)

Krisztina and Bruno were younger than most of the Britons interviewed in Belgium and, while also holding qualified jobs, felt less secure in their social standing in the UK, with Krisztina further feeling that as a Hungarian and more generally a Central/Eastern European she was more exposed to xenophobia.

One aspect that was relevant for a number of these interviewees was the right to vote beyond the local level. This aspect was rarely mentioned by the Britons interviewed in

Belgium¹, as well as by the Italian-Bangladeshis (who, in any case, had voting rights as Commonwealth citizens).

I want to get the vote, I want to vote for the general elections, I want to vote for the referendum [...] I really want to have that rights, and it's the only way, you have to become British.

[...]

It's not like we [she and her husband] feel British, but it's our home now, so we really want to have a say. (Guacimara, Spanish)

In some cases, the interest in voting rights was linked to a personal interest in politics, but it can be also linked to a reactive Europeanness developed in response to the Brexit process, as many EU27 citizens (and, in different ways, many Britons in Europe) felt the need to politically oppose the Conservative UK governments. Guacimara was not the only interviewee to mention the possibility of a second referendum, which was seen as a concrete possibility throughout most of 2019.

One use of citizenship that attracted limited interest among this group was that of welfare rights. Renate, who had a degenerative disease, naturalised because she knew she would have needed welfare in the future, and a few other interviewees resented the possible restrictions in access to welfare on a symbolic level rather than for practical reasons. None of other the EU27 citizens by birth mentioned welfare, which shows a

difference from the older Britons interviewed in Belgium and from most Italian-Bangladeshis. This lack of salience of welfare rights mirrors that of the Polish respondents to McGhee et al.'s (2019) survey, in which the lack of use of welfare seemed to be part of a process of self-legitimation of one's presence in the UK (see also Sigona and Godin 2019, who whoever point out ensuring one's children access to university without the high fees for international students as a reason for naturalisation). As mentioned, some EU27 citizens by birth – a minority, but more than among Britons in Belgium – were sceptical about naturalisation. Apart from a few interviewees who felt they could not think meaningfully of naturalisation because they had only spent a limited time in the UK or because of a precarious migratory project, there were three main reasons (Sredanovic, 2020a). Some interviewees openly rejected any engagement with the procedure of naturalisation (and the high fee required), often as a reaction to the symbolic othering of the Brexit process. For others there was a notion that, even if citizenship could protect from a loss of formal rights, the rise of xenophobia – and even to a greater extent, worries about the UK economy – were problems from which formal citizenship could only provide partial protection. In these cases, there was doubt as to whether leaving the UK was a better choice than becoming British citizens (cf. Sredanovic, 2020b). Finally, similar to the Britons interviewed in Belgium, some interviewees in this group felt they had access to resources to limit the impact of Brexit. EU citizenship was rarely explicitly discussed, but for example it is implicitly

referenced in this passage from the interview with Ilaria:

I see more problems for England rather than for the rest of Europe; in any case I say ‘well folks, I have the rest of Europe I can go to’, I can go to work anywhere, I can decide to go back to Italy. It’s more of a problem for people from here [the UK]. (Ilaria, Italian)

Ilaria, who had no plans to apply for citizenship or any other kind of status and, more generally, was not worried about Brexit (apart from resenting its symbolic implications), also mentioned her younger age and lack of family links in the UK as making leaving the country less difficult. Her interview further implicitly shows a greater appreciation of her EU citizenship and the associated freedom of movement, arguing that Brexit is more of a problem for British citizens.

Valérie had an opposite perspective with regard to Brexit worries. Recently arrived in the UK, she did not exclude naturalising once she met the requirements, but she was already relatively optimistic that she could rely on her will to assimilate to UK society and, to a lesser degree, on her knowledge of the number of Britons who live or have property in her area of origin, the south of France:

We [she and her husband] were not worried by Brexit. [...] That’s exactly because we have decided to live 100% UK. We said ourselves that in any case we have put everything in our favour. And that it would be stupid in any case for a country [...] to rap on the

knuckles of people who do everything to live at 100%. (Valérie, French)

The social mobility (from precarious employment in France to a stable office job in the UK) that the Valérie's migration had allowed further gave hope for the future. Other interviewees (similar to the British interviewees in Belgium) expressed confidence that the personal impact of Brexit could be limited thanks to other resources such as qualified and/or well-paid jobs that could insulate them from some of the effects of Brexit or a long residence in the UK that seemed to make improbable losing the right to stay in the UK.

Italian-Bangladeshis in the United Kingdom

We already described the class position in the country of origin of this category of respondents, as well as their reasons for their onward migration. However, we also want to underline that, their migratory career, which involved more than 15 years of life in Italy, on the one hand, increased their 'migratory knowledge' (Ramos, 2017) as well, as their 'migration capital' (Kaufmann et al., 2004), alongside the trump card of Italian citizenship. On the other hand, it involved a process of social downgrading, typical of the migration from the Global South to the Global North, and reshaped their class habitus and their disposition towards EU citizenship. Having often experienced

administrative irregularity – that is, having lived for years without a residence permit – and having perceived the path towards formal citizenship as difficult and tortuous, EU citizenship is considered a precious, difficult and protective achievement. Therefore, the attitude towards European citizenship of these interviewees and the use they make of it must also be read in the light of the different habitus they developed and embedded: that of citizens of a country of the so called ‘global south’, devoid of any social protection and characterized by very wide social polarization; that inherited from their privileged class positioning in the country of origin; that shaped by the social downgrading inherent in south-north migration; and, finally, that related to the colonial relationship that binds the countries of the former British Empire to the former colonial capital and which, undoubtedly, has always exercised attraction and fascination in the educated middle classes of the former colonized countries.

The prospect of the departure of the UK from the EU obviously alarmed many Italian-Bangladeshi emigrants to London. One of the principal fears reported by interviewees regarding the outcome of the Brexit process, along with the aspiration for upward social mobility for their children, was related to their possible exclusion from the benefits system to which all EU citizens had access. It is important to note, as well, that one of the issues on which the electoral campaign for the referendum hinged was precisely the use of benefits by EU immigrants and so-called ‘welfare shopping’. With the imminent departure of the UK from the Union, the Italian-Bangladeshis were afraid to lose that

right and, thus, lose access to economic support in the case of unemployment or towards defraying living expenses and expenses connected to children and pregnancy – which would make their daily lives more difficult to sustain in a ‘Global City’ that is characterised by a high cost of living, like London:

Worry for the future, yes, because you know that Europe is not going very smoothly now. There is a crisis in the European Union; after the Brexit referendum, relations have worsened with Europe. The laws are changing. My concern is always here, how to stay here in the future. After Brexit it will be more difficult... (Mukul)

The fear of a decrease of what Zeitlyn (2015) defines ‘security capital’, through the loss of the right of access to a welfare, considered more inclusive and protective, can be traced back to the habitus developed in Bangladesh, a country, devoid of any social protection and widely socially polarized.

However, the interviews reveal a heterogeneity of positions with regard to the prospects of EU citizens in the UK. Indeed, some of the interviewees held that the possible departure of the UK from the EU would have not caused substantial repercussions on the destinies of immigrants with an EU citizenship who currently lived in British territory. Some pointed to the presence of Britons in Europe, presupposing an agreement which, in a framework of reciprocity, would protect their citizenship rights, and hence those of all EU citizens in the UK. Ziaur took as an example the agreements on free

circulation made between Switzerland and the EU:

If they decide to apply Brexit, they will be forced to give amnesty; whoever is inside cannot be the victim of a law. Moreover, relations with Europe will not be broken because the English [citizens] are in all of Europe, and if the Europeans cannot stay in England, then the English cannot live in Europe... In Switzerland, which is not a part of the European Union, but has made agreements regarding free circulation with Europe, they have accepted this and they have reciprocity. The same thing will be applied in the UK [for Italians]. (Ziaur)

Apon, on the other hand, trusted in the pressure that qualified British workers in Europe were to exert on the British government to ensure that the British exit from the EU would not have significant consequences for both sides:

They can't do a 'hard Brexit' because one million and 200,000 Britons live in Europe and three million Europeans live in England. The British people who live in Europe work, but not like us; they all have nice jobs, they are working in Europe in 'high' sectors [of the labour market], as directors or in banks or as factory managers. On the other hand, there are 3 million of us Europeans who are here and 80% of us are working... 'at entry level positions'. So if they do a 'hard Brexit', who loses the most, if all of us must leave? If we have to trade places? If all the Europeans have to leave and all the British people abroad have to come back? (Apon)

Thus, just as the referendum, which had sealed the victory of 'leave', seemed to accelerate departures towards the UK, analogously, many Italian-Bangladeshi who were living in London for years believed that the possible consequences of the rift between the UK and the EU would affect those arriving in the future or those who had more recently immigrated. Among these were Razzak:

Brexit doesn't worry me because I came here before the referendum; whoever came before won't have any problems. (Razzak)

However, Brexit pressed many to also consider another kind of international migratory mobility, which was oriented not so much towards a return to Italy, but rather towards another member state – thereby taking advantage of their acquired citizenship. The reactivation of intra-European mobility – which could be the result of a cosmopolitan habitus of the educated middle class to which the interviewees belonged in Bangladesh, but also of the international experience of migration in Europe – was an alternative contemplated, for example, by Abul:

I am thinking of changing, of going to some other country; within Europe it's no problem because I have my passport: Germany, Sweden, Holland... A higher standard of living than in Italy and, with a passport, no problem, you can live a normal life, just like any

other person. (Abdul)

Finally, some interviewees among those who had been residents in the British capital for years, planned to acquire British citizenship. In this way, they hoped to enjoy the civic condition and the social rights connected to citizenship and to fulfil the dream of ‘generations of Bangladeshis’ – to finally become citizens of their ‘former colonial motherland’ and the ‘centre of the Empire’, whose values and institutions are nostalgically represented as still being in effect. This is expression of the attraction and fascination that the educated middle classes of Bangladesh feel for the UK.

Some interviewees held the misconception that holding a third citizenship in addition to their Bangladeshi and Italian ones was not possible (when, as mentioned, none of the three citizenship laws has limits of this kind). As a consequence, they were reflecting on which citizenship they valued more. Selim, who was waiting to reach a sufficient number of years of residency on British soil to apply for citizenship, said he had decided on the loss of his Italian citizenship, so as to be able to participate in the political life of Bangladesh and, above all, to preserve the rights and the ability to manage more easily his properties in his country of origin:

I can't have more than two citizenships. I already have dual citizenship [Italian and Bangladeshi]. If I give up my citizenship in Bangladesh I can no longer participate in the elections, I can no longer have land and so I would lose everything. (Selim)

Monir, on the other hand, intended to neither renounce his citizenship in his country of origin – an option that he located in the realm of impossibility – nor his Italian citizenship because, after the experience of onward migration, he perceived Italy as the country in which he could ‘feel at home’. Italian citizenship, that is, constituted a cardinal element in the construction of his social identity. The interviewee had therefore developed a collective strategy, which involved all the members of his nuclear family, to ensure ‘immunisation’ (Della Puppa and Sredanovic, 2017) from the consequences of an equally collective Brexit. He planned to maintain his Bangladeshi and Italian citizenship, while his wife – whose acquisition of Italian citizenship had been delayed – would take British citizenship:

I have the Italian citizenship. I applied also for my wife, but we have been waiting for a very long time, almost two years. If her citizenship doesn’t arrive and Brexit does, I am thinking that she can get British citizenship. [...] I too could get it, but I don’t want to, because I don’t want to give up my Italian citizenship. [...] However, we will have all three in our family [Bangladeshi, Italian and British] and we will be all set. (Monir)

Conclusions

From the interweaving and comparison of the data gathered from these two studies,

conducted in the UK and in Belgium, we can show the impact of Brexit on the uses of EU and national citizenship, but also how Brexit highlights the way in which such uses are stratified along different axes.

On the one hand, EU27 citizens ‘by birth’ in the UK and British citizens in the rest of the EU feel, often for the first time, that they might be at risk of losing their rights of free movement, and some of them planned to naturalise in order to safeguard their rights to stay, work and move. On the other hand, Brexit reshaped the trajectories of many migrants who had moved or were planning to move to the UK after obtaining citizenship in another EU member state; these individuals had to reconfigure their tactics in order avoid being excluded a second time from UK territory and UK social rights.

More specifically, British interviewees in Belgium were, in most cases, planning to obtain the citizenship of a member state to face the loss of rights that the UK’s departure from the EU entails. Some from this ‘category’ of interviewees, however, in the light of their social and professional positions, relied on other resources (eg length of residence, recognised skills) to ‘immunise themselves’ from the possible negative consequences of Brexit.

The EU27 citizens ‘by birth’ who were interviewed in the UK were more ambivalent about naturalisation, mainly due to the rise of xenophobia and to expectations of an economic crisis in the UK. A minority of them did not see any advantage in remaining

in the UK in social or familiar terms. Others, however, saw in citizenship either a way to safeguard their presence in the UK, or to keep open the option of returning to the country after an onward migration.

Finally, some of the Italian-Bangladeshis in London felt that being EU citizens who had arrived before Brexit was enough to feel safe. For others, Brexit was a cause for fear of a loss of rights. Such loss was feared in symbolic and identitarian terms: backsliding into the condition of ‘foreigners’, a condition from which they believed they had emancipated themselves with the acquisition of EU citizenship, and the consequent humiliation represented by the potential need to apply for some sort of residence permit. Furthermore, in economic and material terms, they feared exclusion from the system of benefits, which is considered to provide a fundamental contribution in a city like London. A few of them were considering a further migration, at least within the UK, to an area less costly than London, while others were strategizing ways to secure British citizenship for at least part of their nuclear family.

The relevance and the security offered by the EU citizenship remain ambivalent. Brexit itself is a proof that EU citizenship does not protect one from extreme cases, such as a member state leaving the EU. Some of the Italian-Bangladeshis interviewed in London felt safe enough with their EU citizen status, while EU27 citizens ‘by birth’ had a more pessimistic outlook – a difference that perhaps reflects different migratory experiences and the fact that for the Italian-Bangladeshis, EU citizenship has been a conquest. Some

of the Britons interviewed in Belgium expressed their intention to obtain Belgian nationality explicitly to safeguard the EU citizenship rights, while others were pursuing the citizenship of *any* EU member state. In sum, while Brexit suggests that EU citizenship is not replacing national citizenship, there are also suggestions that at least for some mobile Europeans the content of EU citizenship is more valuable than that of specific national citizenships.

In general, it is possible to argue that formal citizenship is used for specific purposes, and that such uses are stratified. The choice to take the road towards naturalisation was influenced by a series of factors, including migratory and family plans and, above all, the interviewees' social class and the economic, cultural and social resources at their disposal.

First, expectations about the uses of citizenship were different: all the interviewees had expected before Brexit to have the right to stay, work, and perhaps have the opportunity to try to move to another EU member state. However, only some middle-class Britons conceived EU citizenship in terms of access to an EU-wide labour market for themselves and/or their children, and only a few interviewees had plans for lifestyle migration. Particularly for what concerns the access to the labour market such expectations can be linked to a middle-class habitus in which the free access to qualified jobs is to a degree expected.

Second, there were differences in the salience of different rights. Access to welfare was

pivotal for the Italian-Bangladeshis and important for the older British interviewees in Belgium. In these cases what can be seen at work is respectively class in terms of available income (without access to welfare London had prohibitive costs for many Bangladeshi interviewees) and age as a factor increasing the need for welfare. However, welfare was conspicuously absent from the interviews with EU27 citizens 'by birth', a result that can be linked to the combination of relatively higher available income and of a climate that became hostile to the use of welfare on the part of EU27 citizens. Mobility rights were relatively less salient for the Italian-Bangladeshis, as they were less inclined to move to another country, also because of their longer personal migratory histories (Sredanovic and Della Puppa, 2020). Short-term mobility, however, was essential for some of the Britons and EU27 citizens 'by birth' who had transnational families spanning the UK and the EU, with care responsibilities being a key factor. Moreover, voting rights were only salient for some EU27 citizens 'by birth'.

Third, the resources that could be mobilised as alternatives to formal national citizenship differed. We have already mentioned that the Italian-Bangladeshis were more confident than the EU27 citizens 'by birth' that their EU citizenship and their arrival before Brexit could be sufficient to safeguard them from a loss of rights (but this could be partly linked to the fact that the interviews with the Italian-Bangladeshis were conducted in the earlier stages of the Brexit process). However, some of the interviewees who held 'highly skilled' jobs were more confident that their job would

insulate them from the consequences of Brexit and that their line of work would facilitate their potential future mobility. Here cultural capital (in terms of formal qualifications and work experience) was one resource, but other interviewees relied on their profile and, according to their habitus, valorised their standing as taxpayers (especially among the middle class), their commitment to the country of residence, or their obtention of EU citizenship (especially among the working class).

These differences across different dimensions (ie class, ethnicity, migratory experience, age and family network) show how legal objects – EU and national citizenships – have different uses and assume different values according to the social position of those who hold – or aspire to – citizenship.

Acknowledgements and funding

Sredanovic's research project was funded through a Newton International Fellowship of the British Academy (grant number NF171438) and through a postdoctoral fellowship of the F.R.S.-FNRS (grant number FC22951). Della Puppa's research project was funded by a research grant senior of the University of Padua. Part of the data included in this article have been presented at the research symposium 'A citizenship lens on the links between migrant transnationalism and integration', PRIO, Oslo, 21-23/11/2018

and at the IMISCOE conference ‘Transforming Mobility and Immobility: Brexit and Beyond’, University of Sheffield, 28-29/03/2019. We thank the interviewees, and the participants to the two conferences and the two anonymous reviewers of *Current Sociology* for their comments.

Notes

¹ Britons in EU27 have had significant political mobilisations linked to Brexit (Ferbrache 2019; MacClancy 2019), in some cases building on previous experiences of political participation (MacClancy 2019). However, as even for the British interviewees in Belgium the main political target was the UK government, this did not translate in a specific interest in voting rights.

References

- Antonucci L and Varriale S (2020) Unequal Europe, unequal Brexit: How intra-European inequalities shape the unfolding and framing of Brexit. *Current Sociology* 68(1): 41-59.
- Bashi Treitler V and Boatcă M (2016) Dynamics of inequalities in a global perspective: An introduction. *Current Sociology* 64(2): 159-171.
- Benson M (2020) Brexit and the Classed Politics of Bordering: The British in France and European Belongings. *Sociology* 54(3): 501-517.

- Benson M and Lewis C (2019) Brexit, British People of Colour in the EU-27 and everyday racism in Britain and Europe. *Ethnic and Racial Studies* 42(13): 2211-2228.
- Boatcă M (2021) Thinking Europe Otherwise: Lessons from the Caribbean. *Current Sociology* 69(3): 389-414.
- Boatcă M and Roth J (2016) Unequal and gendered: Notes on the coloniality of citizenship. *Current Sociology* 64(2): 191-212.
- Bourdieu P (1979) *La Distinction : Critique sociale du jugement*. Paris: Minuit.
- Brahic B and Lallement M (2020) From 'Expats' to 'Migrants': strategies of resilience among French movers in post-Brexit Manchester. *Migration and Development* 9(1): 8-24.
- Della Puppa F and King R (2019) The new 'twice migrants': motivations, experiences and disillusionments of Italian-Bangladeshis relocating to London. *Journal of Ethnic and Migration Studies* 45(11): 1936-1952.
- Della Puppa F, Montagna N and Kofman E (2021) Onward migration and intra-European mobilities: A critical and theoretical overview. *International Migration* Epub ahead of print. DOI: 10.1111/imig.12815.
- Della Puppa F and Sredanovic D (2017) Citizen to Stay or Citizen to Go? Naturalization, Security and Mobility of Migrants in Italy. *Journal of Immigrant and Refugee Studies* 15(4): 366-383.

- Erdal MB, Doeland EM and Tellander E (2018) How citizenship matters (or not): the citizenship–belonging nexus explored among residents in Oslo, Norway. *Citizenship Studies* 22(7): 705-724.
- Ferbrache F (2019) Acts of European citizenship: how Britons resident in France have been negotiating post-Brexit futures. *Geography* 104(2): 81-88.
- Hansen R (2009) The poverty of postnationalism: citizenship, immigration, and the new Europe. *Theory & Society* 38(1): 1-24.
- Harpaz Y and Mateos P (2019) Strategic citizenship: negotiating membership in the age of dual nationality. *Journal of Ethnic and Migration Studies* 45(6): 843-857.
- Kaufmann V, Bergman LL and Joye D (2004) Motility: Mobility as Capital. *International Journal of Urban and Regional Research* 28 (4): 745-756.
- Lulle A, Moroşanu L and King R (2018) And then came Brexit: Experiences and future plans of young EU migrants in the London region. *Population, Space and Place* 24(1): e2122.
- Lulle A, King R, Dvorakova V and Szkudlarek A (2019) Between disruptions and connections: “New” European Union migrants in the United Kingdom before and after the Brexit. *Population, Space and Place* 25(1): e2200.
- MacClancy J (2019) Before and beyond Brexit: political dimensions of UK lifestyle migration. *Journal of the Royal Anthropological Institute* 25(2): 368-389.
- Martiniello M and Rea A (2014) The Concept of Migratory Careers: Elements for a

Theoretical Perspective on Contemporary Human Mobility. *Current Sociology* 62(7): 1079-1096.

Mateos P (2019) The mestizo nation unbound: dual citizenship of Euro-Mexicans and U.S.-Mexicans. *Journal of Ethnic and Migration Studies* 45(6): 917-938.

McGhee D, Moreh C and Vlachantoni A (2017) An 'undeliberate determinacy'? The changing migration strategies of Polish migrants in the UK in times of Brexit. *Journal of Ethnic and Migration Studies* 43(13): 2109-2130.

McGhee D, Moreh C, and Vlachantoni A (2019) Stakeholder identities in Britain's neoliberal ethical community: Polish narratives of earned citizenship in the context of the UK's EU referendum. *The British Journal of Sociology* 70(4): 1104-1127.

Monforte P, Bassel L and Khan K (2019) Deserving citizenship? Exploring migrants' experiences of the 'citizenship test' process in the United Kingdom. *The British Journal of Sociology* 70(1): 24-43.

Moreh C, McGhee D, and Vlachantoni A (2020) The Return of Citizenship? An Empirical Assessment of Legal Integration in Times of Radical Sociolegal Transformation. *International Migration Review* 54(1): 147-176.

Prabhat D (2019) The blurred lines of British citizenship and immigration control: the ordinary and the exceptional. In: Id. (ed.) *Citizenship in Times of Turmoil? Theory, Practice and Policy*. Cheltenham: Edward Elgar Publishing, pp.198-216.

- Ramos C (2017) Onward Migration from Spain to London in Times of Crisis: The Importance of Life-Course Junctures in Secondary Migrations. *Journal of Ethnic and Migration Studies* 44(11): 1841-1857.
- Ruget V and Usmanalieva B (2010) How much is citizenship worth? The case of Kyrgyzstani migrants in Kazakhstan and Russia. *Citizenship Studies* 14(4): 445-459.
- Rye JF (2019) Transnational spaces of class: International migrants' multilocal, inconsistent and instable class positions. *Current Sociology* 67(1): 27-46.
- Rzepnikowska A (2019) Racism and xenophobia experienced by Polish migrants in the UK before and after the Brexit vote. *Journal of Ethnic and Migration Studies* 45(1): 61-77.
- Sassen S (2002) Towards Post-National and Denationalized Citizenship. In: Isin EF and Turner BT (eds) *Handbook of Citizenship Studies*. London: Sage, pp.277-292.
- Schachar A (2007) Against birthright privilege: redefining citizenship as property. In: Benhabib S, Shapiro I and Petranović D (eds) *Identities, Affiliations, and Allegiances*. Cambridge: Cambridge University Press, pp.257-284.
- Sigona N and Godin M (2019) *Naturalisation and (Dis)integration for EU Families in Brexiting Britain*. Eurochildren Research Brief Series 6.
- Soysal YN (1994) *Limits of Citizenship: Migrants and Postnational Membership in Europe*. Chicago: The University of Chicago Press.

- Sredanovic D (2014) Quelle est la valeur de la nationalité/citoyenneté en Italie ? Résultats d'une recherche auprès des migrants et des ouvriers italiens à Ferrare. *Migrations Société* 153-154: 47-61.
- Sredanovic D (2020a) The tactics and strategies of naturalisation: UK and EU27 citizens in the context of Brexit. *Journal of Ethnic and Migration Studies* Epub ahead of print. DOI: 10.1080/1369183X.2020.1844003
- Sredanovic D (2020b) Brexit as a Trigger and an Obstacle to Onwards and Return Migration. *International Migration* Epub ahead of print. DOI: 10.1111/imig.12712
- Sredanovic D and Della Puppa F (2020) Aspettative, immaginari e progettualità di mobilità e stanzialità nel quadro della Brexit: cittadini dalla nascita e «naturalizzati». *Polis* 34(1): 85-108.
- Surak K (2021). Millionaire mobility and the sale of citizenship. *Journal of Ethnic and Migration Studies* 47(1): 166-189.
- Urzi D and Williams C (2017) Beyond post-national citizenship: an evaluation of the experiences of Tunisian and Romanian migrants working in the agricultural sector in Sicily. *Citizenship Studies* 21(1): 136-150.
- Zeitlyn B (2015) *Transnational childhoods: British Bangladeshis, identities and social change*. London: Palgrave.