

This article was downloaded by: [Sara Goodman]

On: 22 May 2015, At: 09:39

Publisher: Routledge

Informa Ltd Registered in England and Wales Registered Number: 1072954
Registered office: Mortimer House, 37-41 Mortimer Street, London W1T 3JH,
UK



West European Politics

Publication details, including instructions for authors and subscription information:

<http://www.tandfonline.com/loi/fwep20>

Migrants into Members: Social Rights, Civic Requirements, and Citizenship in Western Europe

Gregory Baldi & Sara Wallace Goodman

Published online: 22 May 2015.



CrossMark

[Click for updates](#)

To cite this article: Gregory Baldi & Sara Wallace Goodman (2015): Migrants into Members: Social Rights, Civic Requirements, and Citizenship in Western Europe, West European Politics, DOI: [10.1080/01402382.2015.1041237](https://doi.org/10.1080/01402382.2015.1041237)

To link to this article: <http://dx.doi.org/10.1080/01402382.2015.1041237>

PLEASE SCROLL DOWN FOR ARTICLE

Taylor & Francis makes every effort to ensure the accuracy of all the information (the "Content") contained in the publications on our platform. However, Taylor & Francis, our agents, and our licensors make no representations or warranties whatsoever as to the accuracy, completeness, or suitability for any purpose of the Content. Any opinions and views expressed in this publication are the opinions and views of the authors, and are not the views of or endorsed by Taylor & Francis. The accuracy of the Content should not be relied upon and should be independently verified with primary sources of information. Taylor and Francis shall not be liable for any losses, actions, claims, proceedings, demands, costs, expenses, damages, and other liabilities whatsoever or howsoever caused arising directly or indirectly in connection with, in relation to or arising out of the use of the Content.

This article may be used for research, teaching, and private study purposes. Any substantial or systematic reproduction, redistribution, reselling, loan, sub-licensing, systematic supply, or distribution in any form to anyone is expressly forbidden. Terms & Conditions of access and use can be found at <http://www.tandfonline.com/page/terms-and-conditions>

Migrants into Members: Social Rights, Civic Requirements, and Citizenship in Western Europe

GREGORY BALDI and SARA WALLACE GOODMAN

How do the states in Western Europe turn outsiders into insiders? This article examines that question by introducing a new qualitative framework that we term national membership conditionality structures (MCS). This framework includes not only status acquisition rules, such as those governing naturalisation and settlement, but also, crucially, civic integration requirements and social benefit eligibility standards. The article illustrates how linkages across these policy sectors shape different membership-making processes for third-country nationals by examining the MCS variation in Great Britain and Germany, two countries that both experienced significant migration inflows beginning in the first post-war decades. As a contrast to these two 'mature' MCS cases, a study of Spain is also included as a 'nascent' case, whose recent experience with large-scale immigration provides an opportunity to consider an MCS under active construction. The article concludes that while EU-level policies and institutions have extended their reach to cover ever more sectors, the components of national MCS remain largely outside supranational purview. As such, membership remains a core imperative of the contemporary nation-state.

Keywords: immigration; social benefit; welfare; citizenship; integration; nation-state

Immigration has brought about profound changes to conceptions of membership and belonging in the nation-states of Western Europe. During past periods of state formation and consolidation, national definitions of membership were set by rules that made clear distinctions between insiders and outsiders. Citizenship not only defined association within the political community; it also articulated the commensurate rights and obligations of membership. However, the influx of newcomers to Europe that began during the post-war economic expansion¹ has caused a renegotiation of both the formal-legal terms of membership and the symbolic identification of belonging in the countries of the region.

In the recent era of transnational population movements, national governments have harnessed both new and existing instruments to (re)assert state authority over the regulation of membership. In this paper, we examine policy responses in three of Europe's largest immigrant-receiving countries: Germany, the United Kingdom, and Spain. Each of these states has experienced significant immigration in recent decades, with third-country nationals (TCNs) from outside of the European Economic Area (EEA) achieving entry under a variety of labour, family unification, asylum, and co-national settlement programmes. We argue that this immigration has generated – and continues to generate – distinct national *membership conditionality structures* (MCS) that uniquely characterise each country's approach toward managing new populations. These structures are characterised by three policy spheres: access to status (including citizenship but also other statuses, such as permanent residency), social benefits eligibility, and civic integration requirements (e.g. language and country knowledge).

In noting the interconnections across these three policy components and emphasising a typology of membership conditionality, we highlight variation in membership promotion across our case countries. This evidence expands on contemporary understandings of membership as stratified, moving beyond dyadic notions of immigrant integration and legal inclusion as merely 'liberal' or 'restrictive', based on the perceived accessibility to entry and citizenship for newcomers. In emphasising the dynamics across policy sectors that comprise national promotion structures, our primary objectives are categorical reconceptualisation rather than causal explanation. Such an explanation lies beyond the scope of this paper, yet our analysis points to a crucial role for path dependence and political parties, and specifically how the inherited legacies of pre-immigration membership structures and the timing of immigration (i.e. when countries first began receiving large numbers of immigrants) along with the configuration, alignments, and incentives of party systems have shaped the particular structures we consider. In the conclusion, we discuss how our evidence speaks to claims of the post-national literature which emphasises the declining power and authority of national actors to define membership in an era of globalisation and increased competence for supranational and international organisations.² As such, we consider the role of the EU in the context of continued divergence of membership ascription. Evidence from our case studies not only supports a robust reinterpretation of membership, but also shows nation-states as more active than ever in self-regulation.

Capturing Stratification through Membership Conditionality Structures (MCS)

Membership is a vital element of the democratic polity; it both confers legitimacy in democratic political systems and provides a sense of common purpose by defining and reaffirming shared traits. Membership is, however, distinct from citizenship, which is a legal and formal category of *full* membership that

confers rights in exchange for obligations.³ Historically, membership was exclusively defined through the status of citizenship (Tilly 1996) and based on either ethnic or civic tropes of national belonging (Brubaker 1992; Kohn 1944). Today, however, this unitary notion of membership as citizenship (in which outsiders are dichotomized as aliens) is replaced by a more complex understanding of membership, labelled by Lydia Morris (2003) as ‘civic stratification’. In this layered view, multiple statuses of membership exist through the practice of various policies dealing with entry, residence, citizenship, and the overall permanence of migrants in host societies. In other words, there are a multitude of membership statuses beyond the insider-citizen and outsider-alien.

This dynamic and stratified understanding of membership permeates the migration literature. Post-nationalists (e.g. Jacobson 1997; Soysal 1994) focus on the source of stratification (i.e. the rise of international human rights norms). Other theoretical accounts, like Christian Joppke’s *Citizenship and Immigration* (2010), usefully unpack citizenship’s conceptual layers to identify distinct components of status, rights, and identity. Finally, empirical studies look at statuses and policies both directly and comparatively. These have ranged over time from Tomas Hammar’s (1990) qualitative account of denizenship (i.e. permanent residence without the opportunity of citizenship; also see Brubaker 1989) to the manifold policy index projects that seek to categorise and capture variation in migrant-related policies today (Banting and Kymlicka 2013; Koopmans *et al.* 2012; MPG 2011), which include – but crucially extend beyond – citizenship. Some of the more expanded policy arenas viewed to impact an immigrant’s degree of inclusion *qua* membership through socio-political integration include, but are not limited to, family reunification, multiculturalism, access to education, and labour market mobility. In light of these different treatments, and given the view of European immigrant-receiving societies in particular, citizenship no longer holds exclusivity as a category of membership as new conditions for belonging are attached to the acquisition of other status categories.

Given this stratified view of membership and the ever-expanding series of policies that create *de facto* categories of belonging, it is then perhaps not surprising that scholars observe significant variation and divergence in state approaches to conferring membership. Early scholarly consensus acknowledged cross-national changes in citizenship policy as a type of pan-European convergence of membership practices – ranging from liberalisation of dual citizenship laws (Hansen and Weil 2002) to civic integration, including language and country knowledge (Joppke 2007). Yet recent studies have challenged this view, identifying instead policy divergence where states adopt similar policies, like cultural requirements, for different reasons and to different effect (Goodman 2014), or identify how distinct national approaches endure through processes of path dependence (Koopmans *et al.* 2012). Even the wave of ‘restrictive backlash’ to counter early, turn-of-the-century liberalisation has not been uniform across Western European nation-states (Goodman and Howard

2013). As the number of policies that regulate membership increases, so too does the number of unique permutations that can exist at the national level.

To organise, categorise, and compare this expansive ascription process, we argue that immigration generates distinct national membership conditionality structures. These reflect a spectrum of institutional frameworks, policy legacies, and political calculations and serve to advance, restrict, and/or define specific membership standings for newcomers at all stages of legal status acquisition. In emphasising the policy areas of national conditionality structures, we seek to draw an important distinction between those policies that *regulate* membership and those policies that *encourage* it, such as anti-discrimination laws or funding for religious minorities. On a fundamental level, policies that encourage inclusion do not demonstrate the same interactions or reflect the same logic of politics as policies that structure formal member-creation by establishing conditionality.⁴ With this heuristic, we examine three components of MCS policy areas below.

I. *Status access*: As noted above, the number of legal statuses is increasing for those without traditional full membership, including permanent residents, asylees and refugees, and other temporary and conditional positions. Therefore, an exclusive focus on full access (i.e. citizenship) presents some fundamental problems for categorising and comparing approaches to member-making. While formal status access rules such as residency length requirements, allowance of dual citizenship, conferring of citizenship based on parentage (*jus sanguinis*) or place of birth (*jus soli*) are significant (see Howard 2009; Janoski 2010), the balancing of benefits and obligations that characterises the regulation of membership is not unique to citizenship, and is observed in the other two MCS policy spheres.

II. *Civic integration requirements*: One of the most prominent and novel developments in the evolving regulation of membership has been the introduction of civic integration, where those seeking citizenship and other legal membership statuses, including entry and permanent residence, fulfil mandatory requirements of language and knowledge of the country through tests, orientation and language training courses, interviews, and integration contracts (Goodman 2012). New civic integration agendas have become so prevalent that scholars have described this ‘civic turn’ as replacing existing national models of integration (Joppke 2007), and potentially reflecting a death knell of multiculturalism (Joppke 2004).⁵ Adoption of civic integration policy has been most prevalent in states where debates over immigration are central to political discourse, from Austria, Denmark, and Germany, to France, Britain, and the Netherlands (Goodman 2014).

III. *Social benefits eligibility*: The final leg to the MCS tripod consists of eligibility and utilisation requirements for social benefits. Contemporaneous to the aforementioned ‘civic turn’ has been what can be generally described as a ‘social downturn’, by which new European welfare state arrangements reflect – as with civic integration requirements – an emphasis on neo-liberalism and values of self-reliance that have had a disproportional effect on newcomers and

visible minorities (Guild *et al.* 2009; Sainsbury 2012; Schierup *et al.* 2006). This downward shift underscores the notion that welfare policy instruments have long been ‘internal’ mechanisms for regulating migration (Geddes 2003a: 153, 2003b). What is new, however, is the increased linking of benefit access and utilisation to the status and civic integration components of countries’ MCS.

To gain greater purchase on the question of how states in Western Europe shape membership through conditionality, and to illustrate the validity and utility of the systematised concept presented here, we begin with an examination of the dynamics of membership conditionality structures in Germany and Britain. These countries are among the largest receivers of immigrants in Europe, accounting together for nearly one in three of the 1.35 million newcomers to the EU reported in 2011,⁶ yet they demonstrate significant variation in MCS orientation and development.

Germany and Great Britain: Contrasting Membership Conditionality Structures

In Germany and Britain, we observe the deployment of status access, civic integration, and benefit eligibility policies in response to the immigration of TCNs that began in both countries after World War II. At the same time, however, we find that variation in these structures has led to different conditional outcomes. In aggregate, we describe German policy interactions as producing an inhibitory MCS. In this MCS, the citizenship regime has been moderated from its historical ethno-cultural orientation and citizenship is possible for non-ethnic newcomers, but the obligation costs – reflected in benefit and civic integration requirements and restrictions – serve effectively to elevate permanent residence as an additional barrier to naturalisation. In Britain, by contrast, we observe the confluence of policies yielding a more promotive MCS, extending meaningful membership acquisition through full incorporation. While Britain has a statutory prohibition on benefits for entrants until they gain permanent residence,⁷ which – as in Germany – is contingent on integration requirements, among other criteria, once this status is reached, most immigrants obtain full access and encounter few further conditions for citizenship.⁸

Germany

To understand the strategic effects across the German MCS, it is necessary to review the country’s traditional conception of membership. Germany was long viewed as a quintessential example of *jus sanguinis*, or citizenship by parentage or descent (Brubaker 1992; Howard 2008: 42). There has been a constant, if diverse⁹ flow of immigration in the post-war period, with the moratorium on economic migration following the 1973–1974 oil shock followed by other categories of migration, namely family reunification and asylum seekers. The

children of these families were raised as *immigrants* in Germany, and gained permanent residence but not citizenship.

Since the 1990s, developments in Germany's citizenship regime have been transformative (see Green 2013). Until then the FRG maintained one of the most exclusionary and ethno-cultural citizenship regimes in Europe, but since the 2000s this orientation has shifted dramatically, with enhanced opportunities for its considerable foreign population to achieve full incorporation.

Yet changes in citizenship policy have not occurred in isolation. Specifically, each significant attempt to liberalise citizenship in Germany to be more inclusive has been blocked or tempered, with escalating conditions, including benefit utilisation (Hemerijck *et al.* 2013: 29) and civic integration requirements (Goodman 2012). Starting with the earliest liberalising reform, the 1990 Foreigners Act drawn up by the Christian and Free Democratic coalition under Chancellor Helmut Kohl, first-generation immigrants could achieve naturalisation, but at the same time the Act introduced language as a general requirement for permanent residence¹⁰ and mandated that applicants for settlement make payments into the social insurance fund for at least five years, thus linking civic integration and social contributions to the achievement of higher membership status.

Such conditionality of access reoccurs as a restrictive bargaining strategy in Germany's second, and much larger, citizenship reform. The 1999 Citizenship Act – interpreted at the time as a significant break from the restrictive past – lowered the residency duration for naturalisation and introduced a type of *jus soli* for children which created the opportunity to obtain citizenship on the condition that one parent is a long-term resident. Applicants who met the residence requirements would be entitled to naturalisation as a right, but with conditions. Specifically, under Section 10 of the law, naturalisation was contingent on the applicant's demonstration of self-sufficiency without public assistance or unemployment benefits, except in cases where such dependence was proved to be not caused by the applicant's fault or negligence (Hailbronner 2012: 7).

Many of these compromises were demanded by the centre-right. The Social Democratic (SPD) and Green coalition government that took office in 1998 sought to initiate liberal citizenship reforms¹¹ but the Christian Democratic Union (CDU) and its Bavarian sister party the Christian Social Union (CSU), while open to some changes, remained opposed to any significant provision for dual citizenship in particular. Through a petition campaign and elections in Hesse that cost the SPD–Green coalition their majority in the Bundesrat, the CDU/CSU were able to block the coalition's plans to introduce dual citizenship (see Green 2004: 95–103; Howard 2009: 134–7). In return for liberalising citizenship reforms, the bill also carried with it the first round of what Hartnell (2006: 391) describes as an 'integration price tag', namely the introduction of language and loyalty requirements. The new law required proof of integration assessed through oral and written German language skills and a declaration of loyalty. Even with the addition of such measures, the CDU/CSU chose not to

support the proposed law in the Bundestag, claiming that it lacked sufficient integration measures and insisting that knowledge of the constitutional order be included with the language requirements.¹² In the end, restrictive oppositional pressure effectively offset a fuller liberalising reform and the policy that resulted was quite moderate, even weak.

The 2004 Immigration Act significantly increased the conditionality of membership in the FRG. Crucially, the Act introduced new civic integration requirements, extending the language requirement outward from citizenship to permanent residence and adding new integration expectations, including attendance of a state-mandated language course (*Integrationskurs*) and knowledge of society, conveyed through a civic orientation course (*Orientierungskurs*). These courses provide labour market skills, but have also proven to be rigorous, extensive, and expensive at a cost of €792 per course, consisting of 660 hours. And while the pass rate for the ‘Life in Germany’ exam remains high (approximately 92 per cent), acquiring German language proficiency at the B1 level proves challenging for many, forcing serial re-sitting and repaying of course fees. Table 1 shows the number of participants completing language certification. For every year, nearly half of participants need to complete one of more levels of language to complete the integration course and take the ‘Life in Germany’ test. This represents a significant impediment to those that are not near the B1 level¹³ and need additional training. Moreover, TCNs who failed to attend these courses or pass the final exam could see a suspension of benefits during their period of non-attendance and even long-term residents could be obligated to attend courses if they received the long-term unemployment benefit known as *Hartz IV* (Wiesbrock 2009: 305–7).

In addition to ties to civic integration, the self-sufficiency requirements under the Immigration Act mandate that – in addition to income – newcomers acquire health insurance coverage and, for some, pensions, without accessing public funds, though certain types of assistance, such as child benefits, could still be obtained (Residence Act, Sec. 1 (2)). Determining precisely which benefits were available for new residents was left vague by the legislation, creating considerable discretion for Länder authorities and variation in the relative restrictiveness of decisions regarding eligibility (Hailbronner 2012). Finally, the Act also retained the 1990 law’s provision that required applicants for permanent settlement to have paid compulsory or voluntary contributions

TABLE 1
COMPLETION PERCENTAGES OF LANGUAGE CERTIFICATION (DTZ), BY LEVEL

Year	B1 level	A2 level	Below A2
2010	49.9	38.2	12
2011	53.8	37.2	9.1
2012	55.9	35.4	8.7
2013	58	33.8	8.1

Source: Das Bundesamt in Zehlen 2013 (2014): 121.

into the statutory pension scheme for at least 60 months and extended the requirement of self-sufficiency for residence permits in addition to settlement permits.

In strengthening civic integration and benefit utilisation conditions for settlement, the 2004 Act established a new, formidable admissions barrier, as the governing coalition came to accept increased integration measures and continued the practice of linking benefit utilisation both to integration and the achievement of specific membership statuses. In short, welfare benefits became contingent on integration, while status became conditional on welfare independence.

Following a change in government in 2005, the CDU-led Chancellery and Interior Ministry added even more civic integration requirements and social benefit restrictions. Among the changes were new provisions cutting benefits by up to 30 per cent for immigrants who failed to complete courses, as well as reforms to the Citizenship Act that added a citizenship test as well as removing a provision of the 2000 law exempting applicants for citizenship under the age of 23 from self-sufficiency requirements, a further instance of benefit utilisation blocking the pathway to citizenship.

These rules and others like it are consistent with patterns in German policy-making in which the rights of membership remain contingent upon the requirements of integration and economic independence from the state, which have *disproportionately* impacted on economically vulnerable immigrants with informal or low-wage work.¹⁴ Even when benefits are available to newcomers, their utilisation – along with employment – has direct consequences for the achievement of further membership statuses. Stretches of unemployment during the first five years of residency may result in the revoking of a residence permit and eligibility for certain benefits and the utilisation of benefits by newcomers without settlement can threaten their resident permit renewals (Hansen and Weil 2002: 40; Ireland 2004: 39–40; Sainsbury 2012: 57).

On its own, changes in access rules paint a picture of growing inclusivity.¹⁵ In the context of other MCS policies, however, liberalisation is more tempered and the law has not brought about the anticipated rise in naturalisations (Green 2013: 341). In 2011, according to Eurostat data, citizenship acquisition rates in Germany were the 18th lowest in the EU-27 and well below the Union average. Indeed, as Table 2 shows, annual naturalisations have generally declined in the FRG since their peak around the time of the citizenship reform in 2000.

In considering the reasons for the lower than expected naturalisation rates, many observers have emphasised the general prohibition on dual citizenship as a particularly strong disincentive. According to a 2006/2007 survey, more than half (57.2 per cent) of Turkish migrants – the largest TCN group in the FRG – cited a desire to retain their Turkish nationality as a reason against seeking citizenship (Worbs 2008). The issue continues to serve as a source of political contention in the FRG. As the result of a compromise in the 2000 law between the SPD–Green coalition and the Christian Democrats, children born in Germany of parents with non-German citizenship could hold dual citizenship until

TABLE 2
NATURALISATIONS IN GERMANY, 2001–2013

	Total naturalisations	Rate (percentage of foreign-born)
2001	178,100	2.43
2002	154,500	2.10
2003	140,700	1.92
2004	127,200	1.74
2005	117,200	1.61
2006	124,600	1.72
2007	113,000	1.56
2008	94,500	1.30
2009	96,100	1.34
2010	101,600	1.41
2011	106,900	1.69
2012	112,300	1.69
2013	112,400	1.39

Source: Statistisches Bundesamt webpage <https://www.destatis.de/DE/Publikationen/Thematisch/Bevoelkerung/MigrationIntegration/Einbuengerungen.html> (accessed 27 August 2014).

the age of 23, at which time they were made to renounce their parents' nationality in order to retain German citizenship (the so-called *Optionsmodell*, or option model). At the SPD's initiative the current Grand Coalition announced plans in 2014 to relax this rule by allowing children born in Germany of migrant parents to apply for two passports provided they can demonstrate that they have lived in Germany for eight years or have attended school for six years by their 21st birthday. Opposition parties in the Bundestag and Turkish community representatives criticised the compromise, with the latter describing it as a 'bureaucratic monster' (*Spiegel*, 8 April 2014). Whatever the long-term effects of the new law, it remains the case that dual citizenship in the FRG is an exception rather than a rule.

Beyond the issue of dual citizenship are the effects of welfare and civic integration rules. As Schönwälder and Triadafilopoulos (2012: 61) note, it is also 'reasonable to assume' that such requirements have had an impact on citizenship acquisition levels and estimate that between 1.5 and 2 million foreign residents in Germany are ineligible for naturalisation because of dependency on unemployment assistance and welfare. Such connections play a critical role in shaping the overall composition of German membership. First, we see an inverse pattern between the decline in naturalisation and the rise in acquisition of permanent residence. While citizenship acquisition rates have declined or held steady in the last decade, between 2005 and 2013 the total number of TCNs holding one of the two types of indefinite residency permits¹⁶ in the FRG rose by more than 300,000, a nearly 7 per cent increase in permanent residents' share of the total TCN population (Statistisches Bundesamt 2014). Low citizenship rates were not due to a lack of potential applicants. In 2008, federal estimates found that as many as 4 million of Germany's 6.73 million foreigners had fulfilled the eight-year residency requirement and were thus eligible to apply for German citizenship (Schönwälder and Triadafilopoulos 2012: 57).

To conclude, these policies add up to an inhibitory membership conditionality structure. While citizenship has become more accessible to non-ethnic newcomers, its achievement has been linked to a demonstration by permanent residents of their ability to remain self-sufficient without relying on social assistance, to participate in the Germany's core contributory programmes, and – by the 2000s – and to obtain proficiency in language and knowledge of the country. This chain of obligations in exchange for the status of full membership and rights with ‘no strings attached’ sustains a policy configuration that – as we have shown in implementation data – is largely exclusive for significant portions of the migrant population. So where we see liberalisation of membership on paper, and generous access to welfare state provisions in principle, we see in practice continued restriction.

Great Britain

Great Britain offers a different image to Germany. Where the FRG attempted to liberalise a restrictive citizenship policy, only to temper it with a chain of conditionality up until and after permanent residence, Britain's traditionally liberal citizenship policy has been maintained, despite similar ties across other MCS policies. Specifically, laissez-faire integration and benefit utilisation rights after permanent residence frontloads restriction in Britain, but then differences with citizenship largely dissolve altogether. Thus, the case comparison highlights why it is insufficient to just look at policies at face value but rather it is necessary to examine how they are interlinked. On the surface, British policy may seem more restrictive but in the long run we observe more promotive membership practices than inhibitory one. This observation is supported most visibly in the very different patterns of citizenship acquisition in Britain since 2000 compared to those in the FRG.

Labelling the British MCS as promotive does not imply that it is necessarily fairer or more generous to newcomers than the inhibitory German MCS; the ‘frontloading’ of restrictions on welfare utilisation in Britain we observe may well contribute to the social marginalisation and general exclusion of migrants in the country. Rather, our conceptions of these two types are meant to highlight how states vary in what we view as the relatively novel practice of regulating belonging through the strategic distribution of social rights and integrative responsibilities (as opposed to residence or ethnicity) and in their efforts to locate newcomers in different positions along continuums of formal and symbolic membership.

Although the political rhetoric in Britain concerning *immigration* is often heated, there is comparative consensus over many core questions of *membership* (Sawyer and Wray 2012: 27–8). Citizenship in Britain has low residence requirements, allowance of dual citizenship, and conferring of citizenship through *jus soli*. Until the late 2000s, there was relatively little change to access rules. Where change was significant was in regard to the *content* of British

citizenship – i.e. what it means to be British. In 1997, a citizenship agenda was integrated into the national curriculum for schoolchildren (for more, see Kiwan 2011) and, with the 2002 Nationality and Immigration Act (NIA), this was extended to immigrants. These origins are distinct not only from Germany, but from all other civic integration-adopting countries (Goodman 2014). The NIA introduced a ‘Life in the UK’ knowledge requirement and an American-style naturalisation ceremony alongside a pre-existing English language obligation for citizenship. Immigrants who were proficient in English could proceed directly to the citizenship test, while immigrants needing English classes could fulfil the requirements instead by taking an English Speakers of Other Languages (ESOL) course with citizenship content. This ‘two-route’ approach aimed to encourage as many immigrants as possible to access citizenship. In contrast to Germany and other restrictive countries, civic integration in Britain was specifically and explicitly designed to ‘incentivize’ citizenship and promote a more meaningful naturalisation process (Kiwan 2013).

The expansion of civic integration requirements to settlement in 2007 reflects the view that, despite content investments and relative ease of acquisition, immigrants might still not see incentives to naturalise but will nevertheless need to achieve integration as permanent participants in the national polity. While the test proves difficult (77 per cent pass rate for settlement as of 2011¹⁷), it is not nearly as difficult as in Germany, where course participants had a pass rate of 67.6 per cent in 2011 and test participants who did not take the course only had a 53.8 per cent pass rate (BAMF 2012: 677). Moreover, British pass rates are the product of a different process, where immigrants *self-assess* to determine whether they are prepared to take the test or not. As such, the most common reason for test failure is not confusing content, but lack of language proficiency (BBC 2010).

In the context of these comparatively small changes in membership content, the most significant changes to membership conditionality occurred through welfare state restructuring. A set of legislative initiatives that began with the 1971 Immigration Act¹⁸ established key precedents for future policies concerning immigration and welfare access. Under the 1971 Act, all newcomers would be required to demonstrate that they possessed the means to support themselves as a condition for entry. Since that time, British policy has consistently emphasised the need for new arrivals to support themselves without relying on state assistance.

Broad retrenchment measures aimed at scaling back welfare benefits, such as the move from public to private provision of welfare and the increased use of means-testing, began during the Conservative Thatcher/Major governments. Both developments have been perceived as disproportionately impacting on immigrants, with reduced access to assistance programmes for many TCN entry categories. Moreover, given newcomers’ precarious position in the labour market, they are often rendered less likely to access private benefits, and the expansion of means-tested benefits, which are frequently harder in practice to

claim, has left many immigrants excluded even when eligible (Sainsbury 2012: 41–3).

A significant development directly targeting newcomers during this period involved the introduction of the ‘Habitual Residence Test’ in 1994, which was designed to limit so-called ‘benefits tourism’. Under the test many immigrants – and some returning British nationals – must prove, among other requirements, that they have resided in the UK for ‘an appreciable amount of time’ in order to be eligible to claim certain benefits, including housing assistance from local authorities (Kennedy 2011: 3–4).¹⁹

Further targeted measures would be enacted under New Labour. The Immigration and Asylum Act 1999 identified in statute for the first time those benefits that could not be legally claimed by people who were subject to immigration control. These included housing benefits, council tax benefits, disability allowances, income support and council tax benefits, child benefits, and income-based jobseeker’s allowance. In addition to its civic integration provisions, the 2002 NIA referenced above also included further benefit access restrictions for newcomers and added tax credits to the definition of ‘public funds’.

The 2009 Borders, Citizenship and Immigration Act aimed to increase the residency requirement from five to eight years as well as reconceptualise the progression from temporary residence to citizenship. In this new schema, permanent residence was reserved only for those whose sending country did not grant dual citizenship, creating a push mechanism for naturalisation while necessitating an interim stage of the unfortunately named ‘probationary citizenship’. The Act also included new restrictions on the benefits available to immigrants, requiring that probationary citizens demonstrate self-sufficiency with limited access to public assistance.

Though seemingly restrictive, the civic requirements and the new limits on social assistance were not intended to restrict access to citizenship *per se* but facilitate it, in the hope that incorporation would not stop at permanent residence (Ryan 2008: 289). Moreover, one could exit the ‘probationary’ stage and obtain a reduction in residency through demonstrations of ‘active citizenship’ such as participation in community service, enhanced facility with English, stable gainful employment, and avoiding legal problems (Home Office 2008: 25). However, reflecting the high fiscal, institutional, and political costs of policy change, the Conservative–Liberal Democratic coalition that took office in 2010 rejected the implementation of the 2009 Act’s core citizenship provisions. The coalition government has, however, made other changes in civic integration practices and immigrant social policies, including a revamped country knowledge test, removing the ‘two-routes’ approach whereby everyone is now required to sit a language (B1 level) and country knowledge exam,²⁰ and lengthening the period before benefits may be accessed by the foreign spouses of British nationals.

Significantly, the implemented changes in benefit eligibility and access for third-country nationals – as well as the new integration requirements – have

been focused largely on the period between entry and settlement. As Hemerijck *et al.* (2013: 19) sum up the shifts in social assistance access for non-EEA nationals:

On the one hand, a habitual residence rule denies several benefits to immigrants who are not yet residents or who have been in the UK for a short period. On the other hand, the waiting times and probationary period, before non-citizens could gain settlement status and become entitled to social benefits, have gradually become longer and the list of excluded allowance has expanded.

Generally, benefit access rights for permanent residents have been without the conditions for status promotion in the UK observed in Germany and are equivalent to those of full citizens. A 2014 UK parliamentary report on migrant benefit claims characterised the benefit access and utilisation rights of TCNs as:

Non-EEA nationals with indefinite leave to remain (often called ‘settled status’) have no time limit on their right to stay in the UK and no conditions may be attached to their leave. They can therefore access social security benefits and tax credits *on the same basis as UK nationals*.²¹ (House of Commons 2014: 3; emphasis added)

Such a focus is consistent with the promotive MCS in Britain that we describe. Even in the face of attempts to reduce ‘the scope of British nationality’ by ‘disentitling’ it for new arrivals in recent decades (Wray 2013: 1–2), overall the numbers of citizenship grants remain quite high by historical standards (Home Office 2013). Indeed, as Table 3 shows, naturalisations increased

TABLE 3
NATURALISATIONS IN BRITAIN, 2001–2013

Year	Total naturalisations	Rate (percentage of foreign-born)
2001	90,282	3.9
2002	120,121	4.6
2003	130,535	5.1
2004	148,273	5.4
2005	161,699	5.7
2006	154,018	5.1
2007	164,637	4.9
2008	129,377	3.4
2009	203,789	4.9
2010	195,046	4.5
2011	177,785	3.9
2012	194,209	n/a
2013	207,989	n/a

Source: Home Office Immigration Statistics webpage <https://www.gov.uk/government/collections/immigration-statistics-quarterly-release> (accessed 26 August 2014).

rapidly in the first years of the 2000s and remained high throughout the decade, with a 10-year average of 4.7 per cent of the foreign-born population naturalising, significantly greater than the 1.7 per cent figure observed in Germany across the same period.

If anything, this image reflects a key difference in how Germany and Britain conceive of their membership problems. In Germany, permanent residence was a solution to minimise potential new demands on citizenship – achieved through dense webs of benefit utilisation and civic integration conditionality. In Britain, permanent residence was a problem, where potential citizens saw no incentive or reason to naturalise. As stated in the ‘Life in the United Kingdom’ Advisory Group’s summary report, ‘There is much that could be done to encourage people to apply for British citizenship at an earlier stage, and that publicity and positive incentives could be targeted towards specific nationality groups’ (Home Office 2003: 7).

In sum, despite both countries’ use of social benefit constriction and civic integration requirements, we observe that *how* states complement citizenship access rules with these conditioning policies ultimately shapes unique membership structures. The within-case analysis of Britain reveals an MCS that emphasises individual promotion and responsibility, maintained in restrictions upon entry and the rise of language and country knowledge requirements for newcomers, but not ones that acts as barriers to full incorporation, as reflected in the general lifting of benefit restrictions and utilisation penalties following settlement and the citizenship incentivisation design of civic integration. In Germany, by contrast, we observe an inhibitory variety of membership, which through the policy obstacles of benefit non-utilisation rules and dense integration coursework create distinct disincentives for the citizenship status acquisition, despite a more general liberalising of naturalisation policy.

A Nascent Membership Conditionality Structure: Which Way for Spain?

The Spanish case is examined here to illustrate what might be termed a membership conditionality structure under active construction. In Spain we find the creation of a coherent MCS has been enervated by endogenous factors involving both the continuing salience of sub-national identity and a historically rooted, diaspora-focused citizenship regime. Among Western European countries, Spain has had one of the least direct experiences of the ‘civic turn’ and ‘social downturn’; we observe only a very recent narrowing of benefits alongside slight movements to promote individual autonomy through integration. The Spanish MCS has largely been driven by the status access component, and specifically its ethno-national citizenship policy that has given preference to newcomers from Ibero-American nations, descendants of Spanish emigrants, and, most recently, dual citizenship to Sephardic Jews who can trace their ancestry to expulsion in 1492.

Spain’s experience with newcomers differs from the other cases examined here, although these differences may prove to be more of timing and degree

rather than of kind. Developments in Spain since 2000 bear more than a passing resemblance to Britain and Germany in the first post-war decades, which were marked initially by large-scale inflows of migrants to both countries but concluded with the recessionary 1970s that brought an end to labour migration and the beginning of the social benefit contractions discussed above. Immigration is almost completely a twenty-first century development for Spain. In 2000, immigrants comprised only 4 per cent (1.5 million) of the total population, but by 2009 that proportion had increased to 14 per cent (6.5 million). Although the economic crisis that began in 2007 marked an end to the period of large-scale inflows, this occurred primarily in response to a tightening labour market rather than a restrictive shift in government policy (Arango 2013: 2). Also in contrast to these other cases, growth in immigration has not resulted in a backlash from the population and immigration has not become highly politicised.²² Finally, Spanish citizenship policy has not undergone a major reorientation in response to the rising levels of immigration. Instead, it has retained – even reinvigorated – its focus on co-ethnicism, maintained through practices of *jus sanguinis* and inclusive naturalisation.²³ In fact, nearly 70 per cent of the naturalisations between 1999 and 2008 involved newcomers from Latin America or former Spanish colonies (Martín-Pérez and Moreno-Fuentes 2012: 645). As such, citizenship ‘has not yet been included in the normative framework aimed at facilitating the integration of immigrant populations’ (Marín *et al.* 2012: 1). For example, while the Civil Code requires ‘evidence of ... sufficient integration’ for citizenship, this has long been assessed through a discretionary interview with a judge of the Civil Registry, who may evaluate proficiency in Spanish, proof of participation in social organisations, and other social habits as proof of adaptation to Spanish culture. This practice – predating the ‘civic turn’ – clearly reflects an orientation toward identifying and incorporating co-ethnics, not integrating immigrant newcomers.

There are, however, signs that Spain is poised for change. While the content of the personal interview has been at the discretion of the judge, the Directorate General of Registries and Notaries ‘has increasingly insisted that the judges of the Civil Registries must ask more specifically about Spanish democratic institutions or history’ (Marín *et al.* 2012: 26). Moreover, in March 2013, Spain’s conservative government presented a draft bill to introduce ‘formal review’ through language and integration tests for the nearly 100,000 foreigners that apply for Spanish citizenship each year (El País 2013). The bill also extends the current Oath of Allegiance to the King to include further commitments to democratic values. Regardless of whether this bill passes and is implemented or not, we see a belated awareness of immigrant integration. The delay in recognition is not only a product of old legal orientations and new budgetary realities; there are distinct effects of regionalism that prevent more comprehensive integration reform (e.g. could a requirement of Spanish instead be fulfilled by obtaining certification in Catalan?).

As the post-Franco welfare state evolved in Spain in the 1980s and 1990s, newcomers were granted extensive social rights and access to benefits

(Hemerijck *et al.* 2013: 40). Since the mid-2000s, however, there are indications that this, too, is trending towards other European practices of limiting access. Such a late arrival of practice would be consistent with patterns observed in the mature MCS of Britain and Germany, where restrictions only sharpened decades after the onset of immigration, but also with the broader development of Spanish social policy. In contrast to most other Western European countries, which experienced major welfare state development and expansion in the 1950s and 1960s, many key components of the Spanish welfare state have only come into place since the 1980s (Moreno Fuentes and Bruquetas Callejo 2011).

Across the 1990s, new legislation and reforms of existing rules progressively expanded non-contributory, tax-financed social assistance programmes to newcomers, most notably healthcare to cover pregnant women and children. Consistent with this expansionary trend at the national level but also driven by European-level developments (most significantly the European Council's Tampere Programme on border control and security issues), the People's Party government passed the Organic Law 4/2000 on the rights and liberties of aliens in Spain and their integration into society (Ferrero-Turrión and Pinyol-Jiménez 2009: 339–40). This extended access to healthcare and basic social services, such as non-contributory pensions and income maintenance programmes run by the autonomous communities, to all who could demonstrate residency.²⁴

However, under a subsequent PP government that took office in 2011 – in a climate of continued high unemployment and budgetary pressures – Spain would make significant steps toward its own 'social downturn'. Under Royal Decree-Law 16/2012, healthcare cards and access to the full services of the NHS, which had become universally available to immigrants under the 2000 law, became invalidated for those without legal residence permits. While emergency services and care for minors and pregnant women would still be provided at no cost, the law sharply limited access to medical services to some 150,000 undocumented immigrants in Spain. Although the government sought to soften its initial proposal by allowing immigrants who fail to qualify for legal residency to obtain health cards by paying an annual premium of €710.40 for those between the ages 18 and 65, the association representing primary care physicians in Spain called on doctors to ignore the law (*El País*, 7 August 2012). Several autonomous communities, including Andalusia, the Basque Country, the Asturias, and the Canary Islands, argued that the new system amounted to a 'restriction of a fundamental right' (*Le Monde*, 6 September 2012).

We anticipate that the austerity and unemployment of the recent economic crisis will lead to a greater deployment of the tools of social policy, and potentially even civic integration, as part of a changing Spanish strategy. In other words, Spain may not remain an outlier for much longer. However, the precise orientation of Spain's future membership promotion structure is difficult to predict. On one hand, the general absence of politicisation over new arrivals and emerging prohibitions on non-settled TCNs' access to social benefits point

towards a more promotive structure, as in Britain. On the other hand, the legacies of Spanish citizenship policy may lead to a more inhibitory German style of membership promotion. Clouding our crystal ball even further is the ongoing contestation between some regions and the central government in Madrid over the definition of national membership. It is possible that any future integration policies in regions such as Catalonia would differ significantly from those formulated by the central government, where dynamics of party competition differ²⁵ and ultimately resemble the asymmetry displayed in Belgium, where Flanders adopted a series of civic requirements that exceeded those of both Wallonia and the national government. For these reasons, we conclude that Spain is likely to develop a mixed MCS, whose membership structure varies depending on an immigrant's country of origin, the region in which he or she resides, and his or her level of economic self-sufficiency.

Conclusion

In general terms, the sources of the policies examined in this paper can be found in the common challenges of membership created by the experience of immigration to Europe that began in the post-war period and challenged long-standing conceptions of membership in its nation-states. As countries like Britain and Germany matured as immigrant-receiving nations, they began to deploy and develop 'internal' mechanisms for the regulation of membership – through citizenship and beyond – to fashion a myriad of formal and symbolic relationships between newcomers and the state. Yet as the same cases further demonstrate, the status access, civic integration and welfare benefit eligibility components of national membership promotion structures have been utilised in different ways and to different effect. We believe this observation demonstrates how nation-states facing broadly similar conditions of international migration can combine new tools with existing policy instruments in variable ways to regulate national membership in the twenty-first century.

In the end, significant differences in membership policy configurations across states unambiguously assert the continued relevance of the nation-state. While civic and social policy trends are widespread, states interpret them differently and devise solutions uniquely. The British and German divergence is particularly illustrative. Policy arrangements reflect national preferences for inclusion and exclusion, and these preferences do not appear to be converging. Instead, one can interpret these policy configurations as a form of adaptation to ensure continuity of national preferences and, thus, continued divergence.

There are no signs immigration will abate in the near future, and with the real but oftentimes unpopular ties of the European Union, there is every reason to suspect nascent policy structures will quickly mature. Germany and Britain offer alternative outcomes of this process of maturation. Either may serve as a trajectory for Spain and other states, which – despite EU attempts at coordination in citizenship, residence, and employment rights in member states,²⁶ and in light of EU-level policies that promote further movement, such as a

cross-national system of coordination for social security benefits²⁷ and the Directives on Family Reunification and Long-term Residents – must balance between internal accommodation or restriction. Yet *how* this balance is achieved remains squarely at the discretion of the nation-state.

Acknowledgements

The authors wish to thank Andrew Geddes, Diane Sainsbury, and two anonymous reviewers for helpful comments and suggestions. An earlier version of this article was presented at the 2013 Annual Meeting of the American Political Science Association in Chicago.

Disclosure Statement

No potential conflict of interest was reported by the authors.

Notes

1. To illustrate, at the time of Germany's founding in 1871, foreigners constituted only five of every 1,000 inhabitants of the country. A century later, in 1970, the number had increased to 42.9/1,000 and by 2011 stood at 90.5/1,000 (Statistisches Bundesamt 2013: Table 1).
2. For example, see Soysal (1994).
3. For an overview of this relational definition of citizenship, see Tilly (1996: 8).
4. As such, this approach provides a framework for theoretically approaching analysis using policy indices, like MIPEX (MPG 2011) or ICRI (Koopmans *et al.* 2012), which include – but do not distinguish between – policies that regulate and policies that encourage inclusion.
5. For a rebuttal, see Banting and Kymlicka (2013).
6. According to Eurostat (2013) data, Germany's share was 172,000 and the United Kingdom's was 313,000.
7. A separate system exists for asylum seekers.
8. These include 'good character' requirements that may render applicants involved in criminal activity or offences such as terrorism or genocide ineligible for citizenship (see Home Office 2014).
9. Migrants have arrived under various labour, family, and asylum schemes, swelling Germany's foreign population to 7.3 million, or nine percent of the population (Hansen and Weil 2002: 15).
10. Administrative guidelines in 1978 stipulated that basic knowledge of German and integration could be a condition under which permanent residence was issued. These rules made basic oral German a full requirement.
11. During the previous decade, the SPD and Greens along with the Free Democrats (FDP) had emphasised the need to reform German citizenship law, including the acceptance – to varying degrees – of simplified naturalisation, dual citizenship, and some form of *jus soli*.
12. Such requirements would be achieved under the CDU–SPD Grand Coalition government in 2008 with the addition of citizenship test to 'assess knowledge of the legal and social system and the way of life in the Federal territory' (see Goodman 2012: 682).
13. Those receiving unemployment benefits or social assistance (*Sozialhilfe*) can apply for fee exemption.
14. The decline in benefits for non-contributory unemployment assistance under the *Hartz IV* reforms in 2005 especially affected immigrants, since they have been more likely than native

- Germans to face unemployment and to rely on assistance programmes instead of contribution-based insurance schemes. For more, see Sainsbury 2012: 60–62.
15. According to Howard's (2009: 738–9) Citizenship Policy Index, which ranks the restrictiveness of countries' citizenship regimes, Germany's regime moved from the most restrictive in the EU-15 in the 1980s to sixth in 2008.
 16. The two unrestricted residency permit types in the 2004 Act are the *Niederlassungserlaubnis* and the *Erlaubnis zum Daueraufenthalt-EG* (since 2013, the *Erlaubnis zum Daueraufenthalt-EU*). For a discussion of differences, see Maassen 2009: 8–9.
 17. FOI #20784, 8 December 2011 (on file with authors).
 18. The Act is primarily known for limiting primary labour immigration from the Commonwealth and creating a unified system of controls for new immigrants under the Home Secretary, reducing the previous distinction between Commonwealth immigrants and aliens from non-Commonwealth countries (Hansen 2000: 192–206).
 19. A further 'right to reside' test was added in 2004.
 20. This is not much of a restriction, though, as applicants for permanent residence ('indefinite leave to remain') overwhelmingly opted for the test route instead of the course by choice (in 2010, 81,688 took the test versus 17,607 for the course). FOI #20784, 13 December 2011 (on file with author).
 21. There are exceptions to the full utilisation for those with settlement namely in instances in which the 'right to remain was awarded as a result of a formal undertaking by another person to maintain and accommodate them' (Kennedy 2014).
 22. With the possible exception of the *Plataforma per Catalunya* (Platform for Catalonia), the far right is non-existent (Arango 2013: 6).
 23. Technically, Spain has a prohibition on dual citizenship. In practice, however, most immigrants retain other citizenship as no formal renunciation practice is in place.
 24. Those with irregular or undocumented status were required to show residency by enrolling in municipal registers, with requirements varying from one autonomous community to another. Consequently, many immigrants faced barriers to health services to which they were formally entitled (Moreno Fuentes and Bruquetas Callejo 2011: 58–65).
 25. Jeram (2014) found that the main nationalist party in Catalonia, the Convergence and Union (CiU), did not initially take exclusionary or integrationist policy positions in response to immigration in the early 2000s. Following its defeat in regional elections in 2003, however, the CiU began pursuing more assimilationist policies in an effort to gain future support from more conservative voters.
 26. For an overview of developments in European case law regarding nationality and TCNs, see Ziemele 2012.
 27. This initiative emerged as a complement to – and indeed incentive for – the intra-EU mobility that has been a core feature of the Single Market project (see Benton 2013). Such a system, however, reflects a *market-enabling* logic that renders it largely (though not completely) distinct from the *member-conditioning* logic that we have considered here and owes its origins to a different set of political and economic imperatives.

Notes on Contributors

Gregory Baldi is Assistant Professor of Political Science at Western Illinois University. His articles have appeared in *West European Politics*, *The British Journal of Politics and International Relations* and *German Politics and Society*. His current book project focuses on the post-war development of general education systems in Britain and Germany. [g-baldi@wiu.edu]

Sara Wallace Goodman is Associate Professor of Political Science at the University of California, Irvine. Her research examines the impact of immigration and citizenship policies on immigrant integration. She is the author of *Immigration and Membership*

Politics in Western Europe (Cambridge University Press, 2014). She is also the author of articles that have appeared in *World Politics*, *Political Studies*, and *Journal of Ethnic and Migration Studies*. [s.goodman@uci.edu]

References

- Arango, Joaquín (2013). *Exceptional in Europe? Spain's Experience with Immigration and Integration*. Washington, DC: Migration Policy Institute.
- Banting, Keith, and Will Kymlicka (2013). 'Is There Really a Retreat from Multicultural Policies? New Evidence from the Multiculturalism Policy Index', *Comparative European Politics*, 11:5, 577–98.
- BBC News (2010). 'British Citizenship Test: One in Three Immigrants Fails', available at http://news.bbc.co.uk/2/hi/uk_politics/8707152.stm (accessed 28 December 2011).
- Beauftragte für Migration, Flüchtlinge und Integration (BAMF) (2012). *9. Lagebericht Der Beauftragten Der Bundesregierung Für Migration, Flüchtlinge Und Integration Über Die Lage Der Ausländerinnen Und Ausländer in Deutschland* [9th Review of the Representative of the Federal Government for Migration, Refugees, and Integration on the State of Foreigners in Germany]. Berlin: Besscom AG.
- Benton, Meghan (2013). *Reaping the Benefits? Social Security Coordination for Mobile EU Citizens*. Brussels: Migration Policy Institute.
- Brubaker, William Rogers (1989). 'Membership without Citizenship: The Economic and Social Rights of Noncitizens', in R. Brubaker (ed.), *Immigration and the Politics of Citizenship in Europe and North America*. Lanham, MD: German Marshall Fund, 145–62.
- Brubaker, Rogers (1992). *Citizenship and Nationhood in France and Germany*. London: Harvard University Press.
- El País (2013). 'Los extranjeros que pidan la nacionalidad pasarán un test de español e "integración"' [Foreigners Seeking Naturalisation will be Tested on Spanish and 'Integration'], 28 March 2013.
- Ferrero-Turrión, Ruth, and Gemma Pinyol-Jiménez (2009). 'Immigration and the Construction of Public Philosophy(ies) of Integration in Spain', in E. Guild, K. Groenendijk, and S. Carrera (eds.), *Illiberal Liberal States. Immigration, Citizenship and Integration in the EU*. Surrey: Ashgate, 337–56.
- Geddes, Andrew (2003a). 'Migration and the Welfare State in Europe', in S. Spencer (ed.), *The Politics of Migration: Managing Opportunities, Conflict and Change*. Oxford: Blackwell, 150–62.
- Geddes, Andrew (2003b). *The Politics of Migration and Immigration in Europe*. Thousand Oaks, CA: Sage Publications.
- Goodman, Sara Wallace (2012). 'Fortifying Citizenship: Policy Strategies for Civic Integration in Western Europe', *World Politics*, 64:04, 659–98.
- Goodman, Sara Wallace (2014). *Immigration and Membership Politics in Western Europe*. New York: Cambridge University Press.
- Goodman, Sara Wallace, and Marc Morjé Howard (2013). 'Evaluating and Explaining the Restrictive Backlash in Citizenship Policy in Europe', *Special Issue: Who Belongs? Immigration, Citizenship, and the Constitution of Legality*, 60, 111–39.
- Green, Simon (2004). *The Politics of Exclusion: Institutions and Immigration Policy in Contemporary Germany*. Manchester: Manchester University Press.
- Green, Simon (2013). 'Germany: A Changing Country of Immigration', *German Politics*, 22:3, 333–51.
- Guild, Elspeth, Kees Groenendijk, and Sergio Carrera, eds. (2009). *Illiberal Liberal States: Immigration, Citizenship, and Integration in the EU*. Farnham: Ashgate.
- Hailbronner, Kay (2012). *Country Report: Germany*. Florence: EUDO Citizenship Observatory.
- Hammar, Tomas (1990). *Democracy and the Nation State: Aliens, Denizens, and Citizens in a World of International Migration*. Aldershot: Avebury, Gower.

- Hansen, Randall (2000). *Citizenship and Immigration in Post-War Britain*. Oxford: Oxford University Press.
- Hansen, Randall, and Patrick Weil (2002). *Dual Nationality, Social Rights, and Federal Citizenship in the U.S. and Europe: The Reinvention of Citizenship*. New York: Berghahn Books.
- Hartnell, Helen Elizabeth (2006). 'Belonging: Citizenship and Migration in the European Union and in Germany', *Berkeley Journal of International Law*, 24:1, 330–400.
- Hemerijck, A.C., T.P. Palm, E. Entenmann, and F.J. van Hooren (2013). *Welfare States and the Evolution of Migrant Incorporation Regimes: Background Paper Reviewing Welfare State Structures and Reform Dynamics in a Comparative Perspective*. Oxford: Centre on Migration, Policy and Society (COMPAS) University of Oxford.
- Home Office (2003). *The New and the Old: The Report of the 'Life in the United Kingdom' Advisory Group*. London: Home Office Communication Directorate.
- Home Office (2008). *The Path to Citizenship. Next Steps in Reforming the Immigration System*. London: Border and Immigration Agency Communications Directorate.
- Home Office (2013). *Immigration Statistics: October to December 2012 – Publications – GOV.UK* available at <https://www.gov.uk/government/publications/immigration-statistics-october-to-december-2012>.
- Home Office (2014). *Booklet AN: Naturalisation Booklet – The Requirements*. London: Home Office.
- Howard, Marc Morjé (2008). 'The Causes and Consequences of Germany's New Citizenship Law', *German Politics*, 17:1, 41–62.
- Howard, Marc Morjé (2009). *The Politics of Citizenship in Europe*. Cambridge: Cambridge University Press.
- Ireland, Patrick (2004). *Becoming Europe: Immigration, Integration, and the Welfare State*. Pittsburgh, PA: University of Pittsburgh Press.
- Jacobson, David (1997). 'New Frontiers: Territory, Social Spaces, and the State', *Sociological Forum*, 12:1, 121–33.
- Janoski, Thomas (2010). *The Ironies of Citizenship. Naturalization and Integration in Industrialized Countries*. Cambridge: Cambridge University Press.
- Jeram, Sanjay (2014). 'Sub-State Nationalism and Immigration in Spain: Diversity and Identity in Catalonia and the Basque Country', *Ethnopolitics*, 13:3, 225–44.
- Joppke, Christian (2004). 'The Retreat of Multiculturalism in the Liberal State: Theory and Policy', *The British Journal of Sociology*, 55:2, 237–57.
- Joppke, Christian (2007). 'Beyond National Models: Civic Integration Policies for Immigrants in Western Europe', *West European Politics*, 30:1, 1–22.
- Joppke, Christian (2010). *Citizenship and Immigration*. Cambridge: Polity.
- Kennedy, Steven (2011). *The Habitual Residence Test*, House of Commons Library Standard Note SN/SP/416. London: House of Commons.
- Kennedy, Steven (2014). *People from Abroad. What Benefits Can They Claim?* House of Commons Library Standard Note SN06847.
- Kiwan, Dina (2011). "'National' Citizenship in the UK? Education and Naturalization Policies in the Context of Internal Division", *Ethnicities*, 11:3, 269–80.
- Kiwan, Dina (2013). 'Learning to Be 'British'? Education and Naturalization in the UK', in Dina Kiwan (ed.), *Naturalization Policies, Education and Citizenship: Multicultural and Multi-Nation Societies in International Perspective*. London: Palgrave, 25–49.
- Kohn, Hans (1944). *The Idea of Nationalism: A Study in Its Origins and Background*. New York: Macmillan Co.
- Koopmans, Ruud, Ines Michalowski, and Stine Waibel (2012). 'Citizenship Rights for Immigrants: National Political Processes and Cross-National Convergence in Western Europe, 1980–2008', *American Journal of Sociology*, 117:4, 1202–45.
- Maassen, Hans-Georg (2009). *Ausländerrecht: Textausgabe mit einer erläuternden Einführung*. Stuttgart: W. Kohlhammer Verlag.

- Marín, Ruth Rubio, Irene Sobrino, Alberto Martín Pérez, and Francisco Javier Moreno Fuentes (2012). *Country Report: Spain*. Florence: EUDO Citizenship Observatory.
- Martín-Pérez, Alberto, and Francisco Javier Moreno-Fuentes (2012). 'Migration and Citizenship Law in Spain: Path-dependency and Policy Change in a Recent Country of Immigration', *International Migration Review*, 46:3, 625–55.
- Migration Policy Group (2011). *Migrant Integration Policy Index*. Brussels: British Council and Migration Policy Group.
- Moreno Fuentes, F.J., and M. Bruquetas Callejo (2011). *Immigration and the Welfare State in Spain*. Barcelona: La Caixa Welfare Projects.
- Morris, Lydia (2003). 'Managing Contradiction: Civic Stratification and Migrants' Rights', *International Migration Review*, 37:1, 74–100.
- Ryan, Bernard (2008). 'Integration Requirements: A New Model in Migration Law', *Journal of Immigration Asylum and Nationality Law*, 22:4, 303–16.
- Sainsbury, Diane (2012). *Welfare States and Immigrant Rights: The Politics of Inclusion and Exclusion*. Oxford: Oxford University Press.
- Sawyer, Caroline, and Helena Wray (2012). *Country Report: The United Kingdom*. Florence: EUDO Citizenship Observatory.
- Schierup, Carl-Ulrik, Peo Hansen, and Stephen Castles (2006). *Migration, Citizenship, and the European Welfare State: A European Dilemma*. Oxford: Oxford University Press.
- Schönwälder, Karen, and Phil Triadafilopoulos (2012). 'A Bridge or Barrier to Incorporation? Germany's 1999 Citizenship Reform in Critical Perspective', *German Politics & Society*, 30:1, 52–70.
- Soysal, Yasemin Nuhoğlu (1994). *Limits of Citizenship: Migrants and Postnational Membership in Europe*. Chicago, IL: University of Chicago.
- Statistical Office of the European Communities (Eurostat) (2013). *EUROSTAT: Regional Statistics: Reference Guide*. Luxembourg: Eurostat.
- Statistisches Bundesamt (2013). *Bevölkerung Und Erwerbstätigkeit: Ausländische Bevölkerung [Population and Occupation: Foreign Population]*. Wiesbaden: Statistisches Bundesamt.
- Statistisches Bundesamt (2014). *Ausländerstatistik [Foreigner Statistics]*. Wiesbaden: Statistisches Bundesamt.
- Tilly, Charles (1996). 'Introduction', in C. Tilly (ed.), *Citizenship, Identity and Social History*. New York: Cambridge University Press, 1–18.
- Wiesbrock, Anja (2009). 'Discrimination instead of Integration? Integration Requirements for Immigrants in Denmark and Germany', in E. Guild, K. Groenendijk and S. Carrera (eds.), *Illiberal Liberal States: Immigration, Citizenship and Integration in the EU*. Farnham, Surrey: Ashgate, 299–314.
- Worbs, Susanne (2008). *Die Einbürgerung von Ausländern in Deutschland, Working Paper 17 der Forschungsgruppe des Bundesamtes für Migration und Flüchtlinge [Naturalisation of Foreigners in Germany: Working Paper 17 of the Research Group of the Federal Office for Migration and Refugees]*. Nürnberg: Das Bundesamt für Migration und Flüchtlinge (BAMF).
- Wray, Helena (2013). 'Naturalisation Procedures for Immigrants United Kingdom', in *Naturalisation Procedures Reports*. Florence: EUDO Citizenship, EUI.
- Ziemele, Ineta (2012). 'Nationality and Third Country Nationals', in *The Court of Justice and the Construction of Europe: Analyses and Perspectives on Sixty Years of Case-Law -La Cour de Justice et La Construction de l'Europe: Analyses et Perspectives de Soixante Ans de Jurisprudence*. New York: Springer, 471–84.