INTRODUCTION

Citizenship Matters: Towards an Interdisciplinary and Global Perspective on Naturalization

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ABSTRACT
This article makes the case for an interdisciplinary and global perspective on naturalization before highlighting the key contributions of this special issue to the field of citizenship studies, relating to three research themes: the history, regulation and the lived experiences of naturalization. It then prepares the analytical ground for the following studies by discussing the most relevant conceptualizations of naturalization in the field: naturalization as social closure, as gentle violence, and as subject-formation. The article concludes by outlining the individual contributions to this special issue.

ARTICLE HISTORY
Received 1 February 2021
Accepted 13 April 2021

KEYWORDS
Citizenship; naturalization; history; regulation; lived experiences; social closure; gentle violence; subject-formation

Introduction

Taking stock of research on migration and citizenship policies more than a decade ago, Liza Schuster (2010, 346) argued that:

There is an urgent need for sobriety, based on the accurate and irresistible gathering of empirical data (especially comparative data), which can illuminate the very real potential and actual dangers associated with government policy and its implementation, and the extent to which they shape and impact on the lives of migrants.

This call for an ‘empirical turn’ is still highly topical today, and it is particularly relevant for the field of naturalization policies which continues to be the subject of reforms in different regions of the world. Naturalization is the culmination of state control over migrants’ access to citizenship that still constitutes the most secure legal status for migrants and significantly enhances their life chances and those of their descendants (Carens 1987; Brubaker 1992; Shachar 2009). Yet, there is a persistent lack of data on the historical emergence, policy implementation, local practices and migrants’ lived experiences of naturalization, especially beyond the West (Schwarz 2016, 7). This is because existing naturalization research has concentrated on written policies and on European and Anglo-Saxon settler nations (e.g., see Bauböck et al. 2006; Joppke 2010; Janoski 2010; Goodman 2014).

This special issue addresses that gap. Bringing together scholars from history, law, political science and sociology, this collection offers insights and case studies from different regions in the Global North (Western Europe, United States) and the Global...
South (Latin America, Africa, South East Asia). While the focus of each article is necessarily limited to specific places and periods, collectively they contribute to the global as well as interdisciplinary re-orientation of naturalization and citizenship studies, thereby further advancing the research initiative of the Global Citizenship Observatory (GLOBALCIT, https://globalcit.eu/). In so doing, the articles assembled here investigate the history, the regulation, and the lived experiences of naturalization.

Firstly, by tracing the origins and evolution of naturalization in various places and moments in time, they contribute to the systematic reconstruction of the historical emergence of naturalization as the standard administrative procedure by which states around the world today admit migrants to formal citizenship. While the origins of this procedure can be found in early modern Europe (see Fahrmeir 2021), the practices and laws of naturalization were exported around the globe in the course of European colonialism and imperialism. Initially defined to privilege white European settlers in colonial contexts, these laws and practices have often been transformed during the transition of the former colonies to independence so as to serve pan-African identity politics and to benefit co-ethnic Asians (see Miki 2021; Low 2021; and Manby 2021).

Secondly, the articles in this special issue analyze the laws and policies that regulate and govern naturalization, as well as the role of various subnational, national and transnational actors. Bestowing state membership is traditionally regarded as a matter of national sovereignty; yet the centralization of naturalization is, in fact, a relatively recent development, a process consolidated in Europe by the end of the 19th century (see Fahrmeir 2021). In the African context, local identification practices and central citizenship admission grants are still in conflict with each other (see Manby 2021). Moreover, since the end of World War II, there have been regulation attempts to induce states to facilitate naturalization and to commit them to relieve the situation of stateless and undocumented people by international law. For example, article 15 of the 1948 Universal Declaration of Human Rights affirms that: ‘(1) Everyone has the right to a nationality. (2) No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.’ And yet, even the most inclusive legal provisions on citizenship may bely those who would need it most – the discrepancy between the law on the books and the law as enforced in practice that Miki (2021) illustrates in her case study of postcolonial Brazil. On the other hand, we observe an inter-state learning process and the transnational diffusion of restrictive naturalization policies, such as the growth of investor citizenship programs (see Low 2021; Shachar 2021), or naturalization tests, courses and ceremonies (see Badenhoop 2021; Bassel and Khan 2021).

Thirdly, the contributions to this special issue share an interest in the lived experiences and perspectives of migrants, as well as in the local practices of citizenship admission, which is still an under-researched dimension of naturalization and citizenship studies. The articles in this special issue reveal a divergence between naturalization laws and regulations on the books and their implementation on the ground, across different geographical and political contexts (Miki 2021; Manby 2021). This divergence facilitates the exclusion from citizenship of particular groups of people, including ethnic minorities, indigenous people and undocumented migrants. Moreover, naturalization becomes less accessible as the desirability of certain groups of migrants is being re-defined along socio-economic lines, e.g., through income thresholds and investor citizenship programs (Low 2021; Shachar 2009). The contributions in this special issue also show that, even in states
with supposedly liberal naturalization regimes, such as the UK and Germany, citizenship applicants become the targets of subject-formation attempts, such as the informal expectation to transform themselves into a political, economic and cultural asset to the state (Badenhoop 2021; on the UK, see also Bassel and Khan 2021). While migrants have little choice but to meet the formalized, legal naturalization requirements, their individual responses to the more discursive aspects of naturalization procedures are neither determined nor consistent, ranging from contestation or disaffection to embrace, as Badenhoop (2021) demonstrates. The ambivalent experiences of naturalization procedures by migrants thus highlight the profoundly conflicting effects of equalization and alienation that naturalization regimes may produce, even when they are supposedly based on meritocratic rules and regulations.

Before I introduce the individual perspectives and core arguments of the articles of this special issue, the following section prepares the conceptual ground by discussing the three most important conceptualizations of naturalization in citizenship studies: naturalization as social closure, as gentle violence, and as subject-formation.

**Conceptualizing naturalization**

*Social closure, discretion and entitlement*

In his seminal work comparing French and German citizenship laws and policies, Rogers Brubaker conceptualized citizenship as both an ‘instrument’ and an ‘object of social closure’ (Brubaker 1992, 31). Drawing on Max Weber, Brubaker argued that, through citizenship, states can include nationals and exclude foreigners and thus employ citizenship as an instrument of inclusion and exclusion. Citizenship is ‘globally inclusive’ because everyone is assumed to belong to one state or another; yet it is ‘locally exclusive’ because every state reserves the right, and exercises its sovereignty, to define its own membership admission criteria (ibid.). Brubaker thus offered a state-centred, nuanced perspective on naturalization, conceiving of the state not only as ‘territorial’ but also as a type of ‘membership organisation’ (ibid., 22).

The articles assembled in this special issue suggest that Brubaker’s definition of citizenship as social closure is still relevant, in different regions and periods. For example, naturalization in 19th century postcolonial Brazil privileged white European settlers (see Miki 2021). In the Asian context of the 20th and 21st centuries, it functions as a tool of population control with regard to class, gender and ethnic selection criteria (Low 2021). However, various contributions in this special issue also suggest that citizenship may, in fact, be globally exclusive and (in some cases) locally inclusive, thus reversing Brubaker’s definition. Historically, naturalization developed from a local to a national, centralized procedure with international ramifications: the more states engaged in naturalization, the more of them were forced to define their own criteria for naturalization and denaturalization, as Fahrmeir (2021) demonstrates in his article. From a global perspective, the current transnational trend of raising income requirements and selling naturalization certificates makes citizenship highly exclusive (Shachar 2009). At the local level, naturalization and identification practices by municipal authorities may sometimes be experienced by migrants as empowering and inclusive (for example in Germany and the UK,
see Badenhoop 2021), and they may be more effective and pragmatic than those managed by central administrations (as, e.g., in some African states, see Manby 2021).

Brubaker (1989, 108–9) distinguishes two different legal systems of naturalization. In the ‘discretionary system’, naturalization is an exceptional privilege granted to a small number of selected candidates as a favor by a powerful state authority whose decision remains intransparent, not open to justification or challenge. In the ‘as-of-right system’, by contrast, naturalization is considered a migrant’s entitlement, a ‘matter of course’ (ibid., 109) for state governments to promote and facilitate, as well as a duty expected from all long-term immigrants. In this case, naturalization is a regular administrative procedure with clear guidelines and relatively low costs.

While this distinction appears useful for comparative legal analyses, it seems to suggest two ideal types that often overlap in practice. Historically, naturalization in Europe emerged from a purely ‘discretionary system’ toward a more standardized one, close to the ‘as-of-right system’ (see Fahrmeir 2021). Miki (2021) shows that, even if the constitution provides a broad, open definition of citizenship, naturalization may be inaccessible in practice for indigenous and African people in Brazil. Similarly, Manby (2021) highlights that regular naturalization provisions exist in most African states but are rarely enacted; and that some exceptional, discretionary grants to specific groups such as Rwandan and Burundian refugees in Tanzania may effectively produce higher naturalization numbers than ordinary grants. In the United Kingdom, where the ultimate decision about a naturalization grant is at the discretion of the Home Secretary, naturalization as well as English language skills may be expected especially from female migrants without adequate state support, as Bassel and Khan argue in this issue. In Germany, an example of the as-of-right system, migrants may experience their naturalization procedure as arbitrary as they find themselves being encouraged or discouraged by officials to submit their application (see Badenhoop 2021).

Whilst Brubaker thus provided a useful analytical vocabulary for studying naturalization, his work has two limitations. The first relates to the Weberian framework of social closure from which he draws normative conclusions about ‘closed’ versus ‘open’ states (Brubaker 1992, 34). That normative approach tends to rank states on a scale of liberalism, according to their supposedly inclusive or exclusive naturalization regimes, and has been adopted by a large part of the literature on citizenship tests which runs the risk of providing academic legitimation for specific tests (see the critical discussion in Badenhoop 2021, pp. 3–4). Moreover, the assumption that citizenship is ‘globally inclusive’ ignores the situation of undocumented and stateless people as valid identity papers are a basic requirement to be eligible for naturalization regardless of the system (see Miki 2021; Manby 2021). The second limitation of Brubaker’s work relates to its methods. Because Brubaker’s analysis is based on policy, legal and archival sources, it neglects the practical implementation of naturalization policies and migrants’ lived experiences on the ground.

**Gentle violence**

Writing at a similar time as Brubaker yet with a focus on the specific experiences of Algerians in France, the sociologist Abdelmalek Sayad offered a migrant-centred, highly critical perspective on naturalization. For Sayad, naturalization is the ‘absorption of […]

nonnationals into the nation’ (Sayad [1999] 2004, 226), it is ‘an act of annexation’ because it is not a ‘mutual’ or ‘fair exchange’ of rights and duties, but rather a ‘relationship of force’ (ibid., 228). Drawing on Pierre Bourdieu’s concept of ‘symbolic violence’, Sayad conceptualized naturalization as a form of ‘gentle violence’ because it creates the ‘illusion that the balance of power has been reversed’ (ibid. 229, emphasis added).

While it remains questionable how an act of naturalization can ever ‘reverse’ the structural imbalance of power between migrants/citizens and the state, Sayad’s work helps to shift the analytical focus to the lived experiences of naturalization from the perspective of migrants who go through citizenship changes. His research highlights the complicated legal situation and personal dilemmas of persons born and resident in France whose parents or grandparents had immigrated from Algeria before Algeria became an independent nation-state. This group of people found themselves subject to frequently changing nationalities. They were considered French when Algeria was still a French département, then deprived of their French citizenship and regarded as foreign Algerian immigrants, and later given French citizenship once again either through optional naturalization or through automatic right of birth (ius soli) since 1963 (ibid., 230–231, 241). Their state memberships were re-assigned and withdrawn due to colonial and postcolonial state developments beyond their control. For these French Algerians, naturalization was ‘their common lot and not the result of an individual and voluntary act’, as Sayad pointed out (ibid., 249). The significance of this empirical observation cannot be overstated as it contradicts the common theoretical assumption according to which citizenship through naturalization is based on consent, as opposed to citizenship through involuntary birthright ascription or attribution.

Sayad’s approach is particularly useful for research in colonial and postcolonial settings where state governments arbitrarily assign, withdraw and re-assign citizenship (although the contributions on Brazil, Africa and Asia in this special issue all suggest that the refusal of citizenship status is a more pressing issue than its involuntary bestowal). However, Sayad’s conceptualization of naturalization as ‘gentle violence’ around the themes of ‘guilt’ (237), ‘betrayal’ (235) and immigration as ‘sin’ (283) entails the risk of structural determinism and overstating the significance of naturalization in portraying naturalization as an exclusively top-down, negative experience. Moreover, Sayad’s work is not necessarily applicable to the experiences of diverse migrant groups in various local and national contexts in the 21st century where immigration movements and naturalization practices are shaped by complex forces beyond bilateral postcolonial relations.

**Subject-formation**

While the conceptualizations of naturalization as social closure and gentle violence highlight the important dynamics of inclusion and exclusion, they tend to neglect the productive effects of naturalization; that is, the ways in which naturalization requirements and procedures provide guidance to migrants in defining and structuring the field of possible actions. Conceptualizing naturalization as a regime of subject-formation helps address that shortcoming in the literature. Informed by poststructural governmentality studies (cf. Foucault 1983; Rose 1999; Bröckling 2016), a subject-formation approach to naturalization examines the ways in which state policies and officials attempt to induce migrants to model their self-conduct and self-understanding towards a certain ideal
subjectivity, as well as the effects of these attempts (Badenhoop 2021). A subject or subjectivity in this understanding exists as a normative vanishing point; it is the product of certain administrative procedures, institutions, narratives that suggest a particular image of an ideal (naturalized) citizen that migrants can never fully achieve, as it is performative and has to be constantly aspired and produced.

One striking example for such a subjectivity is the ‘Super Citizen’ found in current naturalization procedures in the UK and Germany, which requires citizenship applicants to assess and model themselves to become a political, economic and cultural asset to the liberal-democratic, capitalist nation-state (Badenhoop 2017). The ‘Super Citizen’ offers a concept of critique because it draws attention to the state’s overburdening expectations toward citizens by application as opposed to citizens by birthright. Such expectations are expressed, e.g., in citizenship test questions, course curricula or ceremony speeches. Moreover, this subjectivity highlights the discrepancies between a supposedly meritoratic system and migrants’ lived experiences of the naturalization process (Badenhoop 2021).

The subject-formation approach has the advantage of offering a more balanced perspective, combining a state-centered and a migrant-centered focus of analysis. On the one hand, the subject-formation approach shifts the focus of analysis to the ‘problematizations’, ‘rationalities’, ‘techniques’ and ‘authorities’ (Badenhoop 2017, 413) and therefore helps to examine how state governments and naturalization policies suggest to migrants a certain ideal citizen through statutory legal requirements, as well as informal expectations voiced in local naturalization offices, test questions, classroom exercises or ceremony speeches. On the other hand, it allows for scrutinizing the active role of migrants who apply for naturalization because they aspire for citizenship status, while also considering their reaction and response to attempts of subject-formation, as Badenhoop (2021) demonstrates in this issue. (Badenhoop 2021).

Naturalization is an example of subject-formation par excellence as it not only selectively includes migrants; it also attempts to activate and optimize citizenship candidates. While the outcome of the process legally eradicates migrants’ difference (by giving them equal status with ‘natural-born’ citizens), the persistent existence and practice of naturalization procedures in many states re-enacts the distinction between nationals who automatically obtain membership at birth on the one hand, and non-nationals on the other who have to apply for, and be tested to attain, citizenship status. The widespread introduction of naturalization tests, courses and ceremonies (see Badenhoop 2017, Forthcoming 2021; Bassel and Khan 2021) is but one example to demonstrate this point.

**Outline of contributions**

In their diversity in discipline and argumentation, the articles comprising this special issue reflect the multi-disciplinarity of citizenship studies, as well as the fact that the comprehensive scrutiny of naturalization requires a global perspective. We have here case studies from Europe, the USA, Latin America, Africa and South East Asia which are analyzed through the disciplinary lenses of history, law, political theory, and sociology. Some articles combine multiple disciplinary perspectives and country case studies within a region.
This special issue begins with two articles, each of which examines the historical emergence of naturalization in the 19th century, yet in different geographical regions and from different analytical perspectives. In ‘Citizens in Limbo: Naturalization Concepts between Privilege and Membership in 19th-Century Western Europe and the United States’, Andreas Fahrmeir (2021) reconstructs how naturalization as the main route to citizenship and equal political membership status for immigrants was established in the United Kingdom, France, Germany and the United States during the 19th century. Beforehand, naturalization was a rare and expensive economic privilege mainly relevant for foreign wealthy merchants who bought naturalization certificates to gain access to international markets and trading activities, similar to the current global trend of citizenship investor programs (see Shachar 2021). Only during the 19th century did naturalization gain wider political significance, in three specific ways. First, naturalization evolved into a standardized and centralized administrative procedure, diminishing the role of previous intermediate legal statuses and local authorities. Second, naturalization became integrated into the ongoing process of nation-state building as physical residence and proof of cultural integration became standard requirements, e.g., with the introduction of language tests in the UK in 1906. Third, while naturalization now offered a broader range of rights (economic, political and social), the status itself was less secure than before because it could be revoked and leave the naturalized individual stateless.

In ‘Citizens of Nowhere: Illegal Slavery and Racial Silence in the African and Indigenous Histories of Postcolonial Brazil’, Yuko Miki (2021) examines the (in)accessibility of citizenship status in 19th century Brazil, once the largest slave society in the Americas with a remarkably inclusive legal definition of citizenship. Yet, in her article, Miki shows the stark discrepancy between the liberal laws on the books and citizenship denial and exclusion in practice, thereby highlighting the urgent need to move beyond formalistic analyses of legal texts and definitions. Based on archival research, Miki contrasts the racist discourses of European civilization and superiority in the elite debates of the 1824 Constitution drafters with the personal experiences of individuals struggling to win recognition of their illegal enslavement and to gain access to Brazilian citizenship. In pointing to the experiences of undocumented or falsely documented people, Miki argues that citizenship and naturalization laws in postcolonial Brazil were formally inclusive yet inaccessible in practice and therefore largely irrelevant to those who would have needed it most: illegally trafficked Africans and indigenous people who found themselves ‘citizens of nowhere’ (this argument resonates with other Global South contexts, see Manby 2021).

Then follow two articles on the regulation of naturalization that shift the regional focus to East and Southeast Asia, as well as to Africa. In ‘The historical development of the nature of “desirability” in naturalization regimes in East and Southeast Asia’, Low Choo Chin (2021) compares the evolution of naturalization regimes in China, Japan, Korea, Taiwan, Malaysia and Singapore based on a comprehensive review of citizenship legislation from 1910 to 2019. Although her comparison of the six cases reveals different understandings of the nation-state, Low is able to identify a cross-national ‘hierarchy of desirability’ that emerged over four key phases: (1) the origins of naturalization regimes during the early 20th century, (2) desirability based on assimilation of ethnic minorities in the post-war period, (3) desirability based on population control in spousal naturalization regimes, and (4) desirability based on economic contributions by highly skilled
migrants. Her analysis shows that desirability is defined along class, gender and racial attributes in so far as highly skilled professionals and financial elites are placed at the top in the ‘hierarchy of desirability’ whereas low-skilled migrants and spouses occupy the bottom. Low shows that, unlike some Western European states offering pathways to citizenship through *ius domicile* or *ius soli*, naturalization in East and Southeast Asian countries is a tool for population and immigration control.

In her article entitled ‘Naturalization in African states: its past and potential future,’ Bronwen Manby (2021) examines naturalization laws and practices in 54 African states from the early and mid-20th century until today. Based on an extensive dataset of regulations, statistics and media reports, Manby contrasts the legal provisions with the actual practice of naturalization grants. Her analysis shows that, while legal provisions for regular, residence-based naturalization exist in all African states, these are only rarely enacted. Challenging the dominant theories of naturalization which have largely been built on European and Anglo-Saxon experiences, Manby argues that naturalization does not only function as a contract, as a test or as a means of nation-building (e.g., as argued by Orgad 2017). In African contexts, naturalization fulfills the additional, ‘performative’ function of ‘signalling’ to domestic voters that the former colonial rulers from Europe and Chinese business elites will no longer be privileged. Similar to Miki’s argument in relation to post-colonial Brazil, Manby critically highlights that naturalization is de facto inaccessible for those who would need formal citizenship most: long-term labor migrants, refugees and their descendants from other African states who lack identity documentation and/or financial resources.

Ayelet Shachar (2021) examines the role of material wealth (and its absence) in shaping access to citizenship from the perspective of law and political theory in her contribution entitled ‘Unequal Access: Wealth as Barrier and Accelerator to Citizenship.’ Analyzing income requirements and fast-track investment-based routes to entry, residence and citizenship in Europe, the Caribbean and the United States, Shachar argues that access to citizenship (as well as entry and settlement) is made easier for the wealthy, regardless of their social ties to the admitting country, and made more difficult for those with established links but modest means. Shachar critically examines the role of state agents, cliental as well as transnational law firms and the inter-state dynamics, pointing to two competing developments. On the one hand, we see transnational learning between governments, e.g., in the spread of investor programs from small offshore island states to Europe and the US. On the other hand, there are supranational attempts to curb this trend, e.g., through initiatives by the European Union against Malta and Cyprus. Shachar’s analysis forcefully reminds us that, while economic requirements for citizenship are by no means new, the current policy trend to raise economic hurdles poses a fundamental challenge for conceptualizations of citizenship as membership in a political community of equals.

The final two contributions study the lived experiences of contemporary naturalization procedures based on original interview data with migrants and citizenship applicants. In ‘Responding to the call for the Super Citizen: migrants’ ambivalent experiences of naturalization in Germany and the UK’, Badenhoop 2021) provides an empirical analysis of the local implementation and migrants’ reception of naturalization policies, such as citizenship tests, courses and ceremonies, in two major European immigration destinations. Moving beyond the predominant paradigm of inclusion/exclusion in citizenship and migration
studies, Badenhoop argues that the naturalization procedures in Germany and the UK encourage naturalized citizens to transform themselves into political, economic and cultural assets to the nation-state, a subjectivity which she terms the ‘Super Citizen,’ alluding to its overburdening character. Based on original interview data, Badenhoop examines the efficacy of this subjectivity and reveals that the ‘Super Citizen’ call impacts on all migrants but does not produce a uniform answer. Instead, Badenhoop identifies three different types of migrants’ responses: embrace, contestation and disaffection. These responses do not seem to be determined by gender, age, nationality, class, or immigration route as they were found to be scattered across a highly diverse sample. Moreover, the responses were highly inconsistent, sometimes even fluctuating in the same participant’s response, thereby illustrating the highly ambivalent equalizing and alienating effects of naturalization regimes.

Leah Bassel and Kamran Khan (2021) conclude the special issue with their article entitled ‘Migrant women becoming British citizens: care and coloniality’ which provides a qualitative empirical analysis of the experiences of female migrants in the United Kingdom who have taken the British citizenship test. Combining Nancy Fraser’s (2016) critique of austerity measures with postcolonial critiques of citizenship and naturalization, Bassel and Khan examine how care work and the English language and citizenship test requirements impact on migrant women in the UK. Bassel and Khan argue that, through the English language requirement for naturalization, British colonialism continues to shape migrant women’s lives, their access to education and citizenship status. They show that women from a wide range of countries, from Europe and the Global South, negotiate the various public and private expectations regarding their care work and integration work in passing on English language and values as mothers and wives. Bassel and Khan find that, despite these multiple challenges, migrant women find ways of belonging beyond the formal naturalization process, both for themselves and for other female migrants.

Note

1. http://www.un.org/en/universal-declaration-human-rights/ (accessed 03/03/2017).

Acknowledgments

This Special Issue originates in a research project on the genealogy and effects of naturalization conducted from 2018 to 2020 at the Ethics, Law and Politics Department of the Max Planck Institute for the Study of Religious and Ethnic Diversity, Göttingen (Germany). I am indebted to the former Director of the Department, Ayelet Shachar, who provided generous support and encouragement for that project, as well as for this Special Issue. Moreover, I would like to thank the editors of Citizenship Studies, especially Peter Nyers, the anonymous external reviewers, Rainer Bauböck and René Wolfsteller for their helpful comments and support of this Special Issue.

Disclosure statement

No potential conflict of interest was reported by the author(s).
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