



HAL
open science

Brexit, or Theresa May's Headache

Pauline Schnapper

► **To cite this version:**

Pauline Schnapper. Brexit, or Theresa May's Headache. Observatoire de la société britannique, 2018, 21, pp.21-34. 10.4000/osb.2048 . hal-03790388

HAL Id: hal-03790388

<https://hal.science/hal-03790388>

Submitted on 28 Sep 2022

HAL is a multi-disciplinary open access archive for the deposit and dissemination of scientific research documents, whether they are published or not. The documents may come from teaching and research institutions in France or abroad, or from public or private research centers.

L'archive ouverte pluridisciplinaire **HAL**, est destinée au dépôt et à la diffusion de documents scientifiques de niveau recherche, publiés ou non, émanant des établissements d'enseignement et de recherche français ou étrangers, des laboratoires publics ou privés.

Brexit, or Theresa May's Headache

Pauline Schnapper

Résumé

Theresa May has been faced with the complexities of negotiating how to leave the EU with her European partners while presiding over a divided Cabinet, party and country as a whole with no majority in Parliament since the failed June 2017 General Election. This two-level game, always a challenge, is made even more difficult by the fact that the future of the UK outside the EU was never really debated during the 2016 referendum campaign and that no consensus exists on the outcome of the negotiations.

Mots clés: *Theresa May, referendum, Brexit, European Union, Conservative Party*

Introduction

The aftermath of the referendum on leaving the European Union has understandably dominated the eighteen months of Theresa May's leadership of the Conservative party and Prime Ministership. The complex consequences of leaving the EU had barely featured in the referendum campaign as the Leavers claimed it would be an easy and quick process while the Remainers focused on the negative economic consequences of Brexit. But the process and practicalities of actually leaving the organisation after 45 years as well as the type of relations between the UK and the EU in the future were never discussed. Theresa May faced a blank sheet with no precedent to refer to.

This first challenge was compounded by the fact that she had a small majority in Parliament, which she lost when she chose to call for a general election in June 2017, and that the country as a whole was deeply divided over the principle of Brexit and the type of Brexit to negotiate. She was under particularly strong pressure on the one hand from the 'hard' Brexiters who insisted on severing all links with the EU in 2019 before negotiating a free trade deal in the future, and on the other by the Remainers or 'soft' Brexiteers who hoped to maintain the UK in the single market in order to limit the economic disruption that the country would necessarily face. As she started the negotiation process after triggering article 50 of the Lisbon Treaty in March 2017, Theresa May therefore found herself torn between contradictory pressures at home and a united front in Brussels keen to make Britain pay its dues and safeguard the rules of the single market.

This situation, similar to the one David Cameron faced during his doomed renegotiation in 2015-2016, brings us back to the classic "two-level game" described by Robert Putnam when analysing an international negotiation, although this is here applied to the European Union as the international arena. His point was that international negotiations were not insulated from domestic concerns. As he put it, 'At the international level, national governments seek to maximize their own ability to satisfy domestic pressures, while minimizing the adverse consequences of foreign developments' (Putnam 1988: 434). He stressed the fact that, in a

modern democracy, parallel negotiations actually took place at the national (Level II) and international level (Level I), because the negotiators' domestic constituency (voters, Parliament, the media, etc.) were going to ratify the agreement once it was reached, whether directly by referendum or through Parliament. They could therefore only sign a deal which would be acceptable to their constituents. In order to achieve this goal, 'there are likely to be prior consultations and bargaining at Level II to hammer out an initial position for the Level I negotiations. Conversely, the need for Level II ratification is certain to affect the Level I bargaining' (Putnam 1988: 436). Putnam then defined the 'win-set' for the domestic constituency as 'the set of all possible Level I agreements that would "win" - that is, gain the necessary majority among the constituents - when simply voted up or down' (p. 438). This is the deal that can be acceptable to both the international partners and the domestic constituency. The smaller the win-set, for example the bigger the demands at home, the more difficult it will be to reach a deal at level I. In the case of Theresa May since the 2016 referendum, the level II constraints have been multi-faceted and often contradictory, which is making the fate of the Brexit negotiations particularly uncertain.

At the time of writing, in the Autumn of 2017, the Prime Minister had failed to disentangle herself from this conundrum and reach a settlement that could be palatable to Brussels and London. It was an impossible task, but she made it more difficult by never clearly explaining what the real constraints were to the British public and what compromises would need to be made to avoid post-Brexit economic chaos. In order to understand how she could not achieve a positive result, I will first look at the period between September 2016 to February 2017, when May seemed to have become a convert to 'hard Brexit'. Then I will explain how her two-level game proved extremely difficult to sustain until June 2017, when she failed to secure a majority in the General Election she called. Finally, the question will be asked of whether this defeat led to a few concessions by the May government in Brussels and an ever-bigger divide within the British political class.

Theresa May's Conversion to Hard Brexit

The first few months of Theresa May's premiership were supposedly devoted to establishing the UK government's position before triggering article 50 of the Lisbon Treaty, which started a two-year process of negotiation with the EU-27. But May's own stance on Brexit was unclear for several months, as she kept repeating that 'Brexit means Brexit' without any further explanation.

Having been a Remainer during the referendum campaign, though not a very active or vocal one, she needed to establish her credentials as somebody who would deliver Brexit and therefore swiftly turned, in rhetoric at least, into an enthusiastic Brexiter when she became Prime Minister. This probably had also to do with her experience as Home Secretary for six years (2010-2016) where her main focus had been to try to achieve the promised reduction in the number of immigrants coming into the UK to less than 100,000 a year. Her failure to do so had been blamed, at least in part, for the negative vote in the referendum, as anxieties about the level of immigration had played a major role in the vote (Swales 2016). She therefore drew the conclusion from the ballot that her priority should be to address these concerns and reject the free circulation of people in the future deal that would be negotiated in Brussels, even though that would make any attempt to stay in the single market almost impossible. Indeed, since the signing of the Single European Act in 1992, the single market rests on the principle of the freedom of circulation of goods, people, services and capital and these freedoms are inseparable.

As David Cameron had forbidden the civil service from making any plans for a Brexit scenario, Whitehall was also in flux throughout the Autumn. The Prime Minister created a new Department for Exiting the EU, led by the long-time eurosceptic David Davis, which deprived the Foreign Office of part of its traditional role as far as relations with Europe were concerned.

Tensions about strategy and confusion among the different departments were widely reported in the media during that period.¹ In January, the UK's ambassador to the EU, Ivan Rogers, resigned from his job and complained about the lack of preparedness of the government and the need for civil servants to tell ministers 'unvarnished – even where this is uncomfortable – and nuanced understanding of the views, interests and incentives of the other 27', implying it was not the case at the moment.²

At the October 2016 Conservative party conference, Theresa May attempted to put some flesh on her 'Brexit means Brexit' motto while reassuring the Leavers in her party. Her message was blunt and clearly leading towards a 'hard Brexit', with the UK outside the single market and customs union in the future, and no longer under the jurisdiction of the European Court of Justice:

But let's state one thing loud and clear: we are not leaving the European Union only to give up control of immigration all over again. And we are not leaving only to return to the jurisdiction of the European Court of Justice. That's not going to happen. We are leaving to become, once more, a fully sovereign and independent country – and the deal is going to have to work for Britain.

This was confirmed on 17 January 2017 in her Lancaster House speech:

What I am proposing cannot mean membership of the Single Market. European leaders have said many times that membership means accepting the "four freedoms" of goods, capital, services and people. And being out of the EU but a member of the Single Market would mean complying with the EU's rules and regulations that implement those freedoms, without having a vote on what those rules and regulations are. It would mean accepting a role for the European Court of Justice that would see it still having direct legal authority in our country. It would to all intents and purposes mean not leaving the EU at all... So we do not seek membership of the Single Market. Instead we seek the greatest possible access to it through a new, comprehensive, bold and ambitious Free Trade Agreement. (May 2017a)

'Access to' rather than membership of the single market was left undefined but implied that a free trade deal would be negotiated in the future.

In order to keep control of her party, May also attempted to sideline Parliament to start the process of leaving the EU, arguing that the people had voted already. But this was taken to court and the High Court and then the Supreme Court dismissed the government's case, ruling that Parliament was required to give its approval to the triggering of article 50.³ This caused an anti-judge furore in the Eurosceptic press, the *Daily Mail* famously calling them 'Enemies of the People' on 3 November 2016.

In terms of managing Level II, this episode strengthened May's hand in that she was able to show hard Brexiters that she was on their side but had to comply by the ruling. In Brussels though, her radical rhetoric was much less popular. In spite of the divisions between member-states on many topics, she was confronted by a united front on two main issues. The first one was about the four freedoms of circulation which all other member states and the Commission insisted would remain indivisible, which confirmed that the UK could not control EU immigration while staying in the single market. The second was that there could be no sector-by-

¹ See for instance 'Leaked Brexit memo: Whitehall struggling to cope and no single plan', *The Guardian*, 15 November 2016.

² 'Sir Ivan Rogers' letter to staff in full', BBC News, available at www.bbc.com/news/uk-politics-38503504, accessed 14 September 2017.

³ 'Supreme Court Brexit ruling : what happens next ?', BBC News, 25 January 2017, <http://www.bbc.com/news/uk-politics-38721650>, accessed 18 September 2017.

sector participation in the single market, which May had alluded to in her Lancaster House speech.

By the time article 50 was actually triggered, on 29 March 2017, Theresa May had already dug a hole for herself: indeed, anything that pleased her radical backbenchers antagonised her European partners and put her in a weaker position in the Brussels negotiations. The divisions within the party also made any articulation of a clear policy very difficult if not impossible, which led to a lack of explanation to the general public about the compromises that would need to be done to the general public. This left unchallenged the Brexiters' repeated assertions that Brexit would be painless and almost costless, at least by the government.

The impossible two-level game: March-June 2017

The contradictions between the demands made at Level I and Level II were exacerbated during this second phase, explaining to a large extent why Theresa May chose to ask the Queen to dissolve Parliament in May.

At home, the pressure from Hard Brexiters did not abate, whether in Parliament or in Cabinet. Jacob Rees-Mogg became one of the most vocal MPs, joining veteran anti-Europeans in Parliament such as John Redwood in arguing that there should be no compromise in Brussels and that 'no deal is better than a bad deal', an idea that Theresa May herself had dropped at that point. The actual consequences of returning to trade under World Trade Organisation rules for tariffs on goods, agriculture and services and what a 'bad deal' would be were never articulated or defined. In Cabinet, Boris Johnson, supported by Liam Fox, launched a campaign to refuse to pay any 'divorce' bill to the EU, referring to Margaret Thatcher's famous 'I want my money back', which was sure to please traditional Conservative MPs and supporters.⁴ About 40 Tory MPs supported this radical ideological line based on a nostalgic view of a 'Global Britain', returning to its ties with the Commonwealth and the Anglosphere (Wellings 2017).

On the other side, at home also, pro-EU MPs and Lords were emboldened by the Supreme Court judgement to oppose the government, after months when they had felt unable to speak against the 'will of the people' expressed in the referendum. Symbolically, the House of Lords voted an amendment demanding that the government should guarantee the rights of EU citizens living in the UK within three months of triggering article 50, but it was overturned in the Commons. Peers also voted in March to give Parliament the right to vote on the final deal concluded with the EU. John Major, the former Prime Minister, made a rare foray into domestic politics when he criticised the government's strategy and called for 'a little more charm, and a lot less cheap rhetoric' when dealing with Brussels.⁵ Other Conservative and Labour MPs, such as Anna Soubry, Amber Rudd (the Home Secretary) or Chuka Ummuna, were also heard.

Confronted with these contradictory pressures, May chose to announce the introduction of what was then called a Great Repeal bill, which became more simply the EU (Withdrawal) bill later. In a way, it was a perfect embodiment of the ambiguities, if not absurdity, of the whole process, as the withdrawal bill was actually about importing, at least in the short term, the whole body of EU law into British law before deciding on which piece of legislation would be kept.⁶ She also hinted at a possible transition period after March 2019, which might involve keeping the free movement of people for some time. This had been obvious to outside observers for months as it was clear that no agreement would be reached on time on the future of EU/UK relations but was very hard to swallow for those Brexiters for whom border control was the very essence of Brexit.

⁴ 'Boris Johnson urges Theresa May to resist £50bn EU bill', *The Guardian*, 9 March 2017.

⁵ 'John Major attacks government over approach to Brexit', *The Guardian*, 27 February 2017.

⁶ 'What is the great repeal bill and how will it work?', *Financial Times*, 28 March 2017.

In Brussels, during that same period, the 27 remaining member states agreed on a two-stage time frame for the negotiation. First, the divorce issues would have to be settled, which included the financial divorce bill, the question of avoiding a hard border in Ireland and the rights of the EU citizens living in the UK and the British citizens living in the EU. Only when these three issues were settled would the next stage of negotiations start on the future trade deal and possibly a transition period. Michel Barnier, the Commissioner in charge of the negotiations, insisted in his first press conference that they would be hard, in an explicit rebuke to Conservative Brexiters – illustrating the fact that the negotiations were taking place simultaneously at all levels:

‘Some have created the illusion that Brexit would have no material impact on our lives or that negotiations would be concluded quickly and painlessly. This is not the case. There will be consequences. Those who pretend, or who did pretend, that you can leave the EU and there are no consequences simply aren’t telling the truth.’⁷

In late April, in what appeared afterwards as a dangerous gamble, May decided to call for a snap election on 7 June, in the hope that an increased majority would give her more room for maneuver both in her dealings with the Hard Brexiters and the Remainers in her own party. In the end, the campaign, which did not go well for the Prime Minister, was hardly about Brexit, outside platitudes about the rosy future of ‘Global Britain’ repeated by Eurosceptics and May herself. The Labour party chose not to tackle the issue either, focussing instead on domestic policy and thereby avoiding a display of the leadership’s ambiguities about their position on Europe.

The outcome of the election was not what the Prime Minister had anticipated in view of favourable opinion polls. In spite of an increase in the number of votes to 42%, the Conservative party lost its lead during the campaign and ended up losing the small 17-seat majority it had in Parliament while Labour won 40% of the popular vote. Interestingly, youth turnout (which had been a key factor in the referendum) was much higher than a year before, suggesting that worries about Brexit had belatedly encouraged young voters to turn out. Theresa May had to sign a deal with the ten Northern Irish DUP MPs, who had campaigned for leaving the EU (unlike a majority of voters in Northern Ireland) but worried about a possible hard border between the Republic and Ulster following Brexit. She was more than ever at the mercy of a rebellion by her own backbenchers, whether from the pro or anti-European wing.

Reality starts to kick in – or not

The immediate consequence of the election was that the Prime Minister fired her two chiefs of staff, Fiona Hill and Nick Timothy, who had drafted her speeches on Brexit and were responsible for the claim that you could have both high control (of borders and legislation) and high access (to the single market) at the same time after Brexit. It could be hoped that some element of realism would return to the domestic debate after that. But Theresa May’s semi-defeat had several consequences on the Brexit negotiations at the two levels. The first, obvious one, was that her leadership was fatally weakened at home and in Brussels, leaving her in a much weaker position to negotiate in both arenas. Her lack of authority was as much a problem in London as in Brussels, where there were fears that she would not be able to impose whatever agreement was found and that she might not even survive for long as Prime Minister. On the other hand, her political weakness at home could give her a bargaining chip in Brussels, as there was no wish to see her replaced by a hard Brexiter, especially somebody like Boris Johnson. But it also worried her partners that whatever deal they would achieve with her could unravel if she was replaced in 10 Downing Street before March 2019.

⁷ Quoted in ‘Brexit talks will not be quick or painless, says EU’s chief negotiator’, *The Guardian*, 3 May 2017.

The second one, at home, was to embolden soft Brexiters by giving them more leverage in spite of their limited number in the Conservative party. In Cabinet, this line was represented by the Chancellor, Philip Hammond. In Parliament, a cross-party group of backbenchers in the House of Commons, led by Chuka Umunna (Labour) and Anna Soubry, which included also Liberal Democrats, SNP, Plaid Cymru and Green MPs, was established to oppose a hard Brexit as the EU Withdrawal Bill was introduced in Parliament in July. Some element of clarification from the Labour leadership (which was not involved in the cross-party group as such) came when the Shadow Brexit Secretary, Keir Starmer, announced that Labour would support remaining in the single market and the customs union during the transition period in order to protect British business from a ‘cliff edge’ situation on 29 March 2019.⁸

The Brussels side of the negotiation showed no sign of changing its position on the schedule and refused to open talks about the future before the three standing issues were resolved, even when the British government argued that there could be no financial agreement without an idea of the future status of the UK after March 2019. In an effort to give ground for discussion in Brussels, the government published a number of policy papers covering issues such as the Irish border, customs, the role of the European Court of Justice (which it conceded might last during the transition period) or future cooperation on defence and security issues over the summer of 2017.⁹ But Theresa May suffered a number of setbacks from the EU-27. Her wish to start discussing trade deals with third parties during the transition was immediately dismissed by the Commission.¹⁰ Her ideas of seamless trade and an invisible border in Ireland were also considered as unrealistic and unfeasible as she gave no practical details on how both could be achieved.

May was still hampered by the lack of consensus in her Cabinet, with the exception of the need for a transition period where most if not all of the EU rules would continue to apply.¹¹ One glaring illustration of the chasm between ministers came when Boris Johnson, supported by Michael Gove (who had been appointed as Environment Secretary following the general election) broke rank with the official Cabinet line when he spelled out his own view of Brexit in the *Telegraph* just days before the Prime Minister was due to give a speech in Florence. In the article, he claimed that there was no need to pay any due to the EU and he failed to mention a transition period.¹² That Theresa May refrained from sacking him after that episode was a telling sign of her own weakness as leader, especially as at the same time hard Brexiters attacked Philip Hammond, for being too negative about leaving the EU.¹³

Seen from Brussels, Theresa May’s speech in Florence in September 2017 was more constructive than her Lancaster House one a few months before. She insisted on the need to keep a high level of cooperation between the UK and the EU after Brexit, mentioning security, terrorism, climate change and North Korea as examples of challenges that the UK and the EU would still be confronting together. She also mentioned the ‘progress’ which had been made in the negotiation on the Irish border and EU citizens’ rights, and the fact that British judges would ‘take into account the judgements of the European Court of Justice’, which was a concession. She mentioned again, for the future, the possibility of reaching a new kind of agreement, which would be neither like Norway’s (which follows EU rules without having any say in them) nor a simple free trade agreement like the one signed by the EU with Canada:

⁸ Keir Starmer, ‘No constructive ambiguity. Labour will avoid Brexit cliff edge for UK economy’, *The Guardian*, 26 August 2017.

⁹ All the documents are available at <https://www.gov.uk/government/latest?departments%5B%5D=department-for-exiting-the-european-union>, accessed 26 October 2017.

¹⁰ ‘A fantasy: EU leaders dismiss UK’s post-Brexit customs plan’, *The Guardian*, 15 August 2017.

¹¹ ‘While May’s away: Hammond leads cabinet reshuffle on Brexit policy’, *The Guardian*, 29 July 2017.

¹² The full text is available at <https://www.facebook.com/borisjohnson/posts/10155036320191317>.

¹³ ‘Conservative Brexiters turn fire on Philip Hammond’s Treasury’, *The Guardian*, 8 October 2017.

'As I said at Lancaster House, let us not seek merely to adopt a model already enjoyed by other countries. Instead let us be creative as well as practical in designing an ambitious economic partnership which respects the freedoms and principles of the EU, and the wishes of the British people.'

She was once again short on any concrete details as to how this could be achieved though. For the first time, she also mentioned a figure for the financial settlement that the UK government would be ready to pay - £20bn, far short of the Commission's calculation. She confirmed that there would be in practice almost a status quo during the two-year transition period (May 2017).

The speech was well-received in Brussels and considered as more realistic than previous statements by the government but optimism was short-lived as no progress was made in the round of talks that followed.¹⁴ This gave the opportunity to hard Eurosceptics to argue again for no deal at all.¹⁵ At the same time, David Davis, who insisted that his lack of clarity in talks was instead 'constructive ambiguity', refused to publish the conclusions of internal government reports on the future impact of Brexit on different economic sectors because it would supposedly undermine the negotiation.¹⁶ It took a Labour motion under the "humble address" parliamentary procedure, which was voted in Parliament and was considered as binding, to get the government to agree to disclose this advice, although no timetable was mentioned.¹⁷

The conundrum in which Theresa May found herself was epitomised by her difficulty to pass the repeal bill in Parliament. The second reading of the bill took place on 7 September but was then stalled, as it appeared that MPs intended to introduce hundreds of amendments, and could well defeat the government on some of them.¹⁸ Pro-EU Conservative rebels agreed to ally with Labour to demand guarantees that powers repatriated from Brussels (such as agriculture) would be devolved to Scotland and Wales; that there would be full parliamentary scrutiny rather than resorting to so-called Henry VIII powers which enable governments to bypass Parliament to pass technical legislation; that the Charter of Fundamental Rights would be incorporated into British law; and that there would be a statute vote on the future deal before it came into force. The cross-party group mentioned earlier was also adamant that 'no deal' should not be an option and that a binding vote on the final deal should be added to the bill.¹⁹

At the same time, May was unable to change the timetable which had been agreed by the EU-27 in order to start discussions on the final status and future partnership. So May's position in Brussels was clearly further weakened especially as, in spite of what Leavers argued, the partners were not equal in the negotiation – the UK needed a deal more than the EU, and could not control its timetable.²⁰

By November 2017, two parallel developments were clear. At home, the government was far from certain to pass its Withdrawal bill because of its lack of majority in Parliament. In Brussels the negotiation was in quasi deadlock, with the shift to the second phase of the negotiations on the transition (or implementation, as May called it) phase and future cooperation not due until after the December European Council at best. This would leave less than ten months for the second phase, as several months would be needed to ratify the agreement before the UK leaves the EU in March 2019.

¹⁴ 'Liam Fox accuses EU of trying to 'blackmail' UK over Brexit deal', *The Guardian*, 1 September 2017.

¹⁵ 'Tory donors tell May; no deal is better than a bad deal', *The Guardian*, 28 October 2017.

¹⁶ 'David Davis to avoid putting Brexit payment on table in Brussels', *The Guardian*, 23 August 2017; 'Government refusing to publish 50 'secret' studies on Brexit impact', *The Independent*, 14 August 2017.

¹⁷ 'Ministers 'could be in contempt of parliament over Brexit papers'', *The Guardian*, 5 November 2017.

¹⁸ 'EU withdrawal bill debate postponed as Brexit talks hit buffers', *The Guardian*, 12 October 2017.

¹⁹ 'MPs move to block May from signing 'no deal' Brexit', *The Observer*, 15 October 2017.

²⁰ 'Britain yet to face facts on Brexit, EU's Barnier warns', *Financial Times*, 6 July 2017.

Conclusion

The two-level game proved impossible to play for Theresa May, mostly because the domestic level (II) itself was too divided to give the Prime Minister clear preferences and a mandate to defend at the international level (I), because Level II was constantly interfering with Level I, and because she lacked authority over her own party and a majority in Parliament after June 2017.

It was not just the political environment that made the negotiation extremely difficult. The trap in which Theresa May found herself was also of her own making. Her lack of vision and her repetitive empty statements ('Brexit means Brexit', 'Global Britain', 'frictionless trade', etc) prevented her both from asserting authority over her warring Cabinet and from putting forward to the public the real choices that needed to be made, such as between more/less control over borders and more/less access to the single market. Instead she insisted from the start that Britain would leave the single market and the customs union, which had never been debated or even contemplated during the referendum campaign.

As a result, May has yielded to her European partners on a number of topics, especially on a Brexit financial settlement and on the authority of the European Court of Justice during a future transition period, but without explaining them to the British public. Furthermore, these concessions were too limited to allow for substantial progress in the negotiations. More worryingly, the government failed to articulate a realistic vision of what its future relationship with the EU could look like beyond the transition period, except for the inevitable bland statements about close cooperation.

All of this points to a deeper issue which makes the position of any government on Brexit untenable, beyond the failing two-level game and May's own lack of strategy, which is the contradiction between the immediate political legitimacy given by the referendum result to the government which accepted to deliver Brexit, and the sovereignty of Parliament on which the British constitution continues to be theoretically based. The whole debate about whether Parliament should vote on a final deal illustrates this contradiction. There is no majority in Parliament for a Hard Brexit, let alone no deal at all, and yet MPs will be under pressure to accept whatever deal is reached, if one is indeed reached, for fear of being accused of betraying the people. And yet the No vote in the referendum gave no mandate on what type of ties Britain should keep with the continent, and Parliament is not really debating this either through its scrutiny of the withdrawal bill. As a result, the sovereignty of Parliament, which Brexit was supposedly meant to restore, is being undermined, which is one of the many paradoxes brought about by the referendum.

References

May, T, speech to the Conservative Party conference, 5 October 2016, available at <http://www.independent.co.uk/news/uk/politics/theresa-may-speech-tory-conference-2016-in-full-transcript-a7346171.html>, accessed 16 October 2017.

May, T, speech at Lancaster House, 17 January 2017, available at <http://www.telegraph.co.uk/news/2017/01/17/theresa-mays-brexiteer-speech-full/>, accessed 14 September 2017.

May, T, 'A new era of cooperation and partnership between the UK and EU', speech in Florence', 22 September 2017, available at <https://www.gov.uk/government/speeches/pms-florence-speech-a-new-era-of-cooperation-and-partnership-between-the-uk-and-the-eu>, accessed 26 October 2017.

Putnam, R, 'Diplomacy and Domestic Politics: the Logic of Two-Level Game', *International Organization*, Vol. 42, No. 3, pp. 427-460, 1988.

Swales, K, *Understanding the Leave vote*, NatCen Social Research, 2016.

Wellings, Ben (2017), 'The Anglosphere in the Brexit referendum', *Revue Française de Civilisation Britannique*, Vol. 22, No. 2, <http://rfeb.revues.org/1354>, accessed 15 October 2017.