



**HAL**  
open science

# Governing Access to Nationality Through Paperwork: The Discretionary Uses of Documentation for Naturalisation in Belgium, France and the United Kingdom

Djordje Sredanovic, Émilien Fargues

► **To cite this version:**

Djordje Sredanovic, Émilien Fargues. Governing Access to Nationality Through Paperwork: The Discretionary Uses of Documentation for Naturalisation in Belgium, France and the United Kingdom. *Social Policy and Administration*, 2024, 10.1111/spol.13098 . hal-04808943

**HAL Id: hal-04808943**

**<https://hal.science/hal-04808943v1>**

Submitted on 3 Dec 2024

**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.



Distributed under a Creative Commons Attribution 4.0 International License

ORIGINAL ARTICLE OPEN ACCESS

# Governing Access to Nationality Through Paperwork: The Discretionary Uses of Documentation for Naturalisation in Belgium, France and the United Kingdom

Djordje Sredanovic<sup>1</sup>  | Émilien Fargues<sup>2,3,4</sup>

<sup>1</sup>Division of Social and Political Science, University of Chester, Chester, United Kingdom of Great Britain and Northern Ireland | <sup>2</sup>Centre for Sociological Research on Law and Penal Institutions (CESDIP), Université de Versailles Saint-Quentin-en-Yvelines, Versailles, France | <sup>3</sup>Centre for Political Research (CEVIPOF), Sciences Po Paris, Paris, France | <sup>4</sup>Collaborative Institute on Migration (ICM), Collège de France, Paris, France

**Correspondence:** Djordje Sredanovic ([d.sredanovic@chester.ac.uk](mailto:d.sredanovic@chester.ac.uk))

**Received:** 26 April 2024 | **Revised:** 24 September 2024 | **Accepted:** 7 October 2024

**Funding:** This work was supported by Fondation nationale des sciences politiques, Doctoral grant: 2014-2017 and by Fédération Wallonie-Bruxelles.

**Keywords:** bureaucracy | citizenship | documents | implementation | nationality | paperwork

## ABSTRACT

In this paper, we examine the discretionary uses of documentation in the implementation of naturalisation through a comparative perspective focusing on Belgium, France and the United Kingdom. We investigate the organisational and professional factors that are likely to impact variation in the uses of discretion based on documentation. Belgium, France and the United Kingdom represent three interesting case studies involving different actors with different mandates. In Belgium, municipal agents are responsible for a mandatory check of applicants' documents before transferring the naturalisation application to public prosecutors. While only the latter have the mandate to check that the legal requirements are met, most municipal agents are involved in the examination of the requirements. In France, before the digitisation of nationality acquisition in 2023, the initial acceptance of an application involved prefectural agents who had the power to refuse application registration if the documentation was deemed insufficient or 'non-compliant'. In the United Kingdom, 'Nationality Checking Services' (NCS) were available until 2019 in local register offices for an optional check of the application before the transfer to the Home Office, which remains the decision-making body on nationality applications. As United Kingdom law regulates strictly immigration advice, NCSs were often unwilling to express themselves on the chances of an application. Drawing on ethnographic fieldwork consisting of interviews with implementation agents in the three countries and observations of their interactions with applicants, this paper contributes to shedding light on what drives variations in the governance of access to nationality through paperwork.

## 1 | Introduction

In this article, we use ethnographic data to analyse the role of documents in naturalisation procedures in Belgium, France and the United Kingdom. Such comparative work allows us both to advance the understanding of the implementation of nationality policies and to contribute to a wider understanding of the role of documents in policy implementation. We observe, indeed, that while documents might seem the 'objective' and

'stable' component of policy, opposed to the flexible and variable practices of street-level bureaucrats (Lipsky 2010), there is significant margin in the practical, and often discretionary, use of documents. In particular, we propose three ideal-typical understandings of the use of documents, each linked to one of the countries included in our analysis. These include the 'right documents' (Belgium)—that is, an interpretation of which kind of document matches the (usually standardised) requirements set in law; the 'authentic documents' (United Kingdom)—that

This is an open access article under the terms of the [Creative Commons Attribution](https://creativecommons.org/licenses/by/4.0/) License, which permits use, distribution and reproduction in any medium, provided the original work is properly cited.

© 2024 The Author(s). *Social Policy & Administration* published by John Wiley & Sons Ltd.

is, a discretionary analysis based on the suspicion of fraud and falsified documents; and the ‘convincing documents’ (France)—that is, the involvement of documents in flexible evaluation procedures that require some degree of subjective judgement on the part of the state agent. The three ideal-types can draw light on the procedures in the cases we have studied but can also be translated to other countries and other policy domains.

In the following pages, we first locate our analysis theoretically and within the legal and institutional context of the three countries. We then present our method and discuss the differences between the three countries, dealing first with the registration of applications and then with their evaluation. Finally, we present a discussion about the wider implications of our result.

## 2 | Theoretical Frame

Documents are a fundamental pillar of any administration. Grand theories (e.g., Giddens 1987; Scott 1998) have criticised documentation as linked to government processes that engineer society to make it ‘legible’ rather than managing to produce accurate understandings of social situations. More specifically, discussions of registration, censuses and identity documents have been divided between analyses that see them as oriented to surveillance and the extraction of value (in particular taxes) and those that also identify aspects that are beneficial for those registered or holding ID (see e.g., Torpey 1999; Lyon 2009; Szepter and Breckenridge 2012; Sredanovic 2023).

On the other hand, documents can be considered the other face of the policymaking enacted by street-level bureaucrats (Lipsky 2010). Where the practice of street-level bureaucrats makes their work doable by redefining policy day by day, documents represent to a certain extent the more fixed aspects of policy. While some formulations of discretion describe it as delimited by what is fixed in (written) norms (Dworkin 1977), others point out how norms would never be applicable without the exercise of discretion (Pratt 1999). Dubois (2012) in particular argues that street-level bureaucrats do not necessarily ignore the formal policy, but aim to pursue the spirit of the law. In this sense, street-level bureaucrats could be seen as operating on two levels: the level of the practice, in which the policy is remade according to the organisational needs of the job, and the level of documentation, in which the actual work is rewritten to match the formal requirements of policy. These two levels interact and influence each other, with street-level bureaucrats using and producing documents, such as guidelines and instructions, to implement policy in their daily tasks. Furthermore, users of street-level bureaucracies heavily rely on documentation to access services and benefits, and their ability to navigate the system often hinges on providing the documents deemed valid and necessary by the administration (Siblot 2006; see also Hull 2012).

Paperwork, in both physical and digital formats, thus remains a crucial aspect of policy implementation that scholars often underline (on the importance of paperwork in the allocation of social benefits, see e.g., Tarshish and Holler 2024). However, within migration policy, there has been relatively little exploration into how documentation shapes interactions between

migrants and the bureaucrats or support personnel involved in implementation tasks (with some exceptions, such as Borrelli and Andreetta 2019). Among the existing research, scholars have emphasised the role of documentation in (de)legitimising the presence and rights of migrants (see e.g., Tuckett 2018; Borrelli and Lindberg 2019). Additionally, they have highlighted bureaucrats’ discretionary power in determining the ‘right documents’ migrants are expected to provide (Spire 2008; Alpes 2017), as well as in creating internal documentation such as administrative guidelines and regulations (Vetters 2019; Frost 2024).

In the field of access to nationality specifically, research has focused on the implementation of specific conditions for naturalisation—especially conditions of ‘civic integration’ (Goodman 2010)—and paid less attention to documentation in the registration and processing of applications. The rare studies that have considered the role of documents have pointed to the importance of providing well-ordered application files to increase one’s chance to acquire nationality (Hajjat 2012; Mazouz 2017; Fortier 2021). Discussing naturalisation policies in the United Kingdom, Fortier (2021) has further observed how applicants are required to conduct a curatorial work to produce documents that present an image of themselves that is acceptable and believable for the Home Office. Other studies have underlined the wide margin of manoeuvre that street-level bureaucrats enjoy when requesting and screening the documents provided by naturalisation applicants (Badenhoop 2023), and their capacity to reject applicants for lack of a specific document without the need to produce any reasoned decisions (Spire 2005; Sredanovic 2022a).

Nationality policies represent one of the essential components of state sovereignty, and they are usually defined by high levels of discretion, with most naturalisations representing a concession of the state. We have observed elsewhere (Sredanovic 2022a) that, differently from visas, border controls, asylum and residence, nationality is not on the ‘frontline’ of migration policies, as in most cases the permanence on the territory of the applicants is not immediately in question. A combination of this and of nationality being often coded as a concession is that, while civil society actors have a variable involvement in the procedures (which we detail later), the concept of the ‘battleground’ between different kinds of actors (Ambrosini 2021; Dimitradis et al. 2021) is less applicable to this domain of migration policies.

Importantly for our analysis, nationality acquisition has historically tended to follow ad hoc evaluation procedures, with agents using the powers reserved to the state to decide on the suitability of candidates to nationality (Sredanovic 2024). Such tendency has been limited since the late 1990s by the spread of standardised integration requirements for nationality (Goodman 2010), including tests, mandatory integration courses, and the use of documents, such as degrees. While in most cases such reforms have increased the requirements demanded from the applicants, they have also somehow limited the discretion available to agents, and, importantly from the present analysis, shifted some of the weight from ad hoc evaluations to the use of documents (Badenhoop 2023; Sredanovic 2024). Still, such shift to a degree simply transfers some of the discretion and power to evaluate from the agents of nationality to other institutions (e.g., degree-granting educational institutions), and, as we show also in this

article, does not exclude that the discretionary evaluation of the applicant is partly transformed in a discretionary evaluation of the documents (Sredanovic 2024).

### 3 | Context

Belgium, France and the United Kingdom share a similar residence requirement—5 years in most cases—for nationality candidates, and each of the three countries have some kind of integration requirements that apply to most candidates. All three countries are also former colonial powers, and in France and the United Kingdom (but less so in Belgium) a significant part of the resident, non-citizen population has origins in former colonies. However, even looking only at the main norms in nationality legislation, the similarities end here, as the three countries define integration differently, have different structures and procedures and different degrees of discretion involved.

In the United Kingdom, the integration requirements are fulfilled through two tests, one for language (but, e.g., holders of diplomas or degrees obtained in English-speaking institutions are exempted) and one for culture ('Life in the UK'), administered through externalised testing centres. All applications are centralised in a Liverpool branch of the Home Office (the UK equivalent of a ministry of the interior) and processed by civil agents without a background in law. The attribution of nationality is highly discretionary in the letter of the law, as most cases are concessions on the part of the UK authorities, and the right of appeal is limited to points of law and factual errors.

In Belgium, integration is assessed almost exclusively through documentation, with a complex system to verify 'social' integration, the knowledge of one of the three national languages, and the participation in the economy (e.g., 5 years of uninterrupted employment cover all three the requirements, and a diploma or degree obtained in Belgium counts both towards the language and towards the participation in the economy requirement). The applications need to be introduced in the register (*bureau d'état civil*) of the municipality of residence and are transferred to one of 14 local public prosecution offices, in which they are evaluated by magistrates. The obtention of nationality is as-of-right if the documentary requirements are fulfilled and there are no law infractions or security issues linked to the candidate, and there is a full right to appeal.

In France, proficiency in French (referred to as *assimilation linguistique*) is a requirement for both the standard naturalisation process, based on residence and applications for French nationality through marriage to a French citizen. Previously, this requirement was assessed through interviews with prefectural agents. However, since 2011, it necessitates either holding a diploma or passing a test. On the other hand, the evaluation of 'cultural assimilation' (*assimilation culturelle*) for standard naturalisation remains subject to discretionary assessment through interviews conducted within prefectures (see Fargues, Pélabay, and Sénac 2023). The processing of applications for French nationality based on marriage to a French citizen follows a two-step process. Initially, the applicant submits their application to the local prefecture, which collects all necessary documents and provides favourable or unfavourable opinions (*avis*) to the

central administration responsible for French nationality access (*sous-direction de l'accès à la nationalité française*, hereafter, SDANF). However, the ultimate decision lies with the SDANF. As for standard naturalisation, applicants also submit their documents to local prefectures, which are responsible for gathering required documentation and, since 2010, also making negative decisions on applications. Prefectural agents cannot approve applications for naturalisation without a final decision from the SDANF. Under French law, a distinction is drawn between applications for standard naturalisation, which are discretionary and based on concessions, and the marriage procedure, which follows an as-of-right approach provided the applicant meets necessary requirements. In both procedures, applicants have the right to appeal.

### 4 | Method

This article is based on a comparative study of the implementation of nationality policies in Belgium, France and the United Kingdom, which the two authors conducted in part separately and in part jointly between 2016 and 2018, mostly based on qualitative in-depth interviews. In Belgium, Sredanovic has conducted interviews with 23 civil registers (a total of 27 officers interviewed), seven *parquets* (a total of nine between magistrates and jurists interviewed) and six between associations and institutions helping with nationality applications. In France, Fargues has made non-participatory observations in three prefectural boards, conducted 17 interviews with prefectural agents and one collective interview with five officers from the SDANF. The French fieldwork was conducted mainly in one prefectural board (PR1) located within a Paris suburb.<sup>1</sup> Several sessions of observations were made there in March and May 2016, as well as January, June and July 2017, counting for 15 full days in total. Other observations have been conducted on shorter periods in another prefectural board within another Paris suburb (PR2), and in another located in a major city in the South of France (PR3), respectively, in June and July 2017. In the United Kingdom, the two authors have jointly interviewed 14 officers of the Nationality Checking Team, 2 officers of the Nationality Policy Team and 1 officer of the denaturalisation team, all of the Home Office in Liverpool, a collective interview with 7 officers of UK NARIC (agency certifying non-UK degrees, including for nationality application purposes) and one interview with an individual officer of Learndirect (agency involved in the Life in the UK and English language tests). In addition to this, we have individually conducted interviews and observations with Nationality Checking Services (Sredanovic: 7 NCSs with 8 officers interviewed in Northern England and Wales; Fargues: 7 NCSs in Southern England including 17 staff interviews and 12 days of observations within the NCS of two different London boroughs—8 days and 6 days each).

While the two projects were autonomously conducted with the exception of the joint fieldwork in the United Kingdom, we have used similar procedures to reach out to the interviewees, as well as similar interview guides. In all cases, we have contacted interviewees mostly through direct emails, with some snowball mediation, and, in the cases of the Home Office and UK NARIC, the collaboration of the institution in setting up interviews. The interviews have covered the organisation of the work, including

numbers of officers, volume of applications processed, and interactions with other institutions and internal division of labour and routines. Further, we have explored points of law and policy that emerged from our analyses of legislation and official documents, to understand how the officers dealt with such points, and we have invited them to discuss further points that needed their interpretation. The interviews were generally audio-recorded, except when the interviewee preferred not to be recorded, case in which we took ethnographic notes; in particular, in the interviews with the Home Office in the United Kingdom, we have always taken separate notes and compared them. The interview-based approach has allowed us not only to cover different countries and kinds of institutions, but also to identify variations between local institutions (registers and *parquets* in Belgium, prefectures in France, NCSs in the United Kingdom). The present article is based on a re-analysis of the data collected that is both theory-driven (guided by specific debates about documents, discretion and practices within the literature) and inductive (in particular to identify the ideal-types of logics applied to documents). A comparative approach across the three countries and, in the cases of decentralised procedures, across different local branches, has also been essential to identify the variation in the uses of documents.

## 5 | The Uses of Documents in the Registration Phase

The introduction, or registration, of a nationality application is one of the main moments in which the bureaucracies of nationality in the three countries work as street-level bureaucracies in contact with the public, at least before the digitisation of application submission in France (2023) and the UK (2019). Indeed, in all the three countries, the decisions on attributing nationality are largely taken in contexts to which the applicants have no direct access (except in France where prefectural agents gained the authority to refuse naturalisation applications in 2010). Comparing the role played by the registration phase between Belgium, France and the United Kingdom shows how the interaction between legislation and bureaucratic organisation brings different configurations, as well as how this apparently banal passage tends to have more influence than expected on the whole policy. In a previous comparison of Belgium and the United Kingdom, Sredanovic (2022b) has shown the different role played by the institutions involved in the initial introduction of nationality applications—registers (*bureaux d'état civil*), which are a mandatory step in Belgium—and NCS, a facultative service that applicants could use to help with the introduction of applications in the United Kingdom.<sup>2</sup> Such analysis has shown how difference in policy, inter-institution relations, professional culture and fees (see also below) mean that in Belgium the registers actively filter out nationality applications, often despite the insistence of the applicants, while in the UK, NCSs had a more limited filtering role and indeed were often reluctant to advise on the chances of success of an application. In this section, we extend the comparison to include France, and focus more specifically on the role of documents in the practices linked to the introduction of applications.

As mentioned, in Belgium, nationality applications can be only introduced at the register of the municipality of residence of the

applicant. Controlling that the application includes all the documents required is the only role that the law attributes to municipalities before the application is transferred to the magistrates. However, Belgian registers exercise such role in an extended way, controlling not only the presence of the required documents but also that each document fulfils the requirements set in the law (Sredanovic 2020, 2022a). This extended role taken upon by the registers seems to derive in some cases from pressure exercised by the magistrates to forward only applications that meet the requirements set in the law, but in other cases appears a mere show of zeal on the registers' part. In any case, the evaluation role taken by the registers has very limited backing in the letter of the law, and limits applicants' right to appeal negative decisions (see immediately below), and as such is criticised by the associations helping the applicants (Sredanovic 2020, 2022a). Given this extended role taken by the registers, refusals of applications for incomplete documentation can cover a wide range of questions, such as the degree to which part-time work can fulfil the economic participation requirement, or what kind of degrees can be considered to fulfil the knowledge of one of the national languages required by the law (see Sredanovic 2020, 2022a for a more detailed discussion). A refusal of this kind is technically appealable in the Council of State, if a formal document of the refusal is produced. In practice, however, this seems an exceptional case. First, most of these refusals remain at the stage of verbal answers, without a formalised, written refusal that could be appealed in front of a court. Second, of 23 registers interviewed, only one was categoric about refusals, with all others mentioning that in the case of sufficiently insisting applicants the dossier is forwarded to the magistrates even when the registrars think it does not fulfil the requirements (Sredanovic 2020).

In France, the initial acceptance of an application for nationality acquisition can vary depending on the procedure and differs across prefectures. For instance, while at PR3, applications for both naturalisation and declaration by marriage were submitted via postal mail, at PR1 and PR2, only applications for declaration by marriage followed this route. Applications for naturalisation, the most common, were handled in person at the counter.<sup>3</sup> Interestingly, the rationale behind this organisation was based on the perceived characteristics of the local populations. PR1 and PR2, both situated in the same department, had populations considered to be poor and less educated. The decision to maintain a 'pre-reception' (*pré-accueil*) at the counter was rooted in the belief that these populations might struggle to meet bureaucratic requirements, making it impractical to examine documents via postal mail due to time constraints. The organisation of application submissions influenced the likelihood of applicants providing complete documentation. At PR3, naturalisation applicants were contacted 2 months prior to their regulatory 'assimilation interviews' and given the chance to complete their dossiers. However, at PR1 and PR2, where assimilation interviews immediately followed application registration, this opportunity was either not available or depended on the discretion of the agents. Consequently, applicants faced a higher risk of encountering 'refusals at the counter' (*refus de guichet*). In all prefectures, agents retained the power to refuse application registration if the documentation was deemed insufficient. These refusals, termed 'refusals at the counter', do not leave documental or statistical trace, differently from others based on allegations

of incomplete dossiers or submission of documents considered 'non-compliant'. This includes decisions of inadmissibility (*ir-recevabilité*) under Article 47 of Decree No. 93-1362 and decisions to close applications without further action (*classements sans suite*). Historically, inadmissibility accounted for around 8% of total refusals, while *classements sans suite* remained low, constituting less than 2% of refusals.<sup>4</sup> However, following the decentralisation of decision-making power to prefectures in 2010, the number of inadmissibility decisions significantly declined. From 2012 to 2015, fewer than 10 cases per year were recorded. This shift can be attributed to the reform implemented in 2010, which encouraged agents to reject applications 'at the counter' rather than registering the application and later having to provide a reasoned decision of inadmissibility or *classement sans suite*. Rejecting applications at the counter saves time for agents and helps them in meeting their individual processing targets.

Both the Belgian and the French case show not only the relevance of document-based refusals but also the difficulties of obtaining comprehensive statistics on the rate of acceptance of nationality applications. In both countries, indeed, a significant part of the refusals, likely constituting the majority in Belgium, are never officially registered, which limits the validity of official statistics on refusals.<sup>5</sup> Moreover, attempts to compare statistics across countries are hindered by variations in how different types of refusals are recorded or omitted in these statistics.

In the United Kingdom, as mentioned, filtering at the introduction of applications is limited. This is firstly because there is no mandatory intermediate step, as the applications can be sent directly by mail (or, more recently, online) to the nationality team of the Home Office. A further factor in such difference is the fee attached to an application. The main fee (which does not include some other potential costs to obtain documents and/or undergo tests) is limited at the moment of writing to 55 euros in France and 150 euros in Belgium, but is of 1580 pounds in the United Kingdom. This does not only mean that the fee itself has the effect of filtering out some applicants in the United Kingdom but also that there is a specific interest for the Home Office of having a higher number of applications, as the fee is explicitly established at a level above the cost of processing an application (Fargues 2019a; Sredanovic 2022a), becoming effectively a source of income for the institution. Still, our interviews with the NCS show that they did have some filtering role, as well as a role in making the applications more in line with the requirements of the Home Office, although such process was limited to advice. For example, following the Home Office's 2014 guideline change regarding the assessment of the good character requirement, which prohibited naturalisation for applicants suspected of 'illegal entry' or 'evasion from immigration control', the NCSs used a helpline to contact the Nationality Team in Liverpool and conduct checks on applicants they suspected fell into this category (usually former asylum seekers). Should the Home Office have confirmed that the applicant was likely to fall into the prohibited category, the NCSs would advise the applicants on the potential refusal and the risk of losing the fees. However, they would also emphasise that the decision to submit the application rested with the applicant and take precautionary measures to protect themselves for being blamed for not alerting applicants

on their potential ineligibility (Fargues 2019a).<sup>6</sup> Considering that NCS-processed applications were estimated to constitute about half of all the incoming applications, the filtering role of the NCS still significantly impacted the overall process.<sup>7</sup>

Beyond state actors, associations in Belgium were involved in giving advice and help to applicants and, at least in the Brussels region, were occasionally contacting municipalities or *parquets* to advocate for an interpretation of the requirements more favourable to a specific applicant. In France, however, except in a few departments where prefectures collaborated with local associations known as PIMMS, NGOs played a relatively limited role during the application submission stage.<sup>8</sup> Their involvement was more frequent when naturalisation requests had been rejected, as they would provide guidance to applicants on the appeal process. In contrast, in the United Kingdom, where it is technically illegal to provide immigration advice without specific qualifications, we found less evidence of a strong role for NGOs.

## 6 | Documentation Logics in Application Evaluations

Once an initial application has been accepted for evaluation it undergoes a more extensive examination, although we have seen in the previous section that this follows a filtering which can range from substantial (in Belgium and France) to more limited (in the United Kingdom). At this stage, the decisions on nationality applications are also themselves regularly documented, and, at least in the three countries here considered, also need to be motivated in case of refusal. However, the degree to which motivation is required, and especially the range of acceptable motivations for a refusal, significantly change the functioning of nationality attribution in the three countries. Moreover, as anticipated in the introduction, the evaluation phase shows quite defined tendencies in the three countries, which can be understood ideal-typically as logics. These include a logic of the 'right documents' in Belgium, of 'authentic documents' in the United Kingdom and of 'convincing documents' in France.

In Belgium, the documentary system (Wautelet 2014) means that all requirements (except those linked to law infractions and national security) must be proved through closed lists of documents provided by the applicant, and that the oppositions can be based only on shortcomings of these documents or, again, on law infractions or security issues. Belgium is indeed a case of as-of-right nationality acquisition for applicants who fulfil all requirements. As a consequence, the main questions in the implementation of nationality law in Belgium are whether specific kinds of document fulfil the requirements set in the law. To a large extent, these are issues of interpretation of the highly codified, but also relatively complex, Belgian nationality legislation, which we have covered elsewhere (Sredanovic 2020, 2022a). However, some aspects are specifically about the match between the documentation and the legislation. A typical example are certificates of integration courses, which in Belgium can be used to prove both social integration and, as integration courses usually include a language component, the knowledge of one of the national languages. However, during our interviews we found that for example Flemish integration courses created issues when the

language component was not followed, usually because the applicant was already proficient in Dutch.<sup>9</sup> As the requirement in law demands specifically the *completion* of an integration course (or a diploma, or obtaining a language certificate in a testing institution), the fact that the document explicitly exempted the applicant from following the course was seen as an issue. This passage from an interview with an organisation helping with applications presents part of the issue:

A2: *[there are documents that mean] that you do a test, and you already have the knowledge about what you will learn ...*

Sredanovic: *... as an alternative to following the whole course ...*

A2: *... yeah. And then the question was 'is this document for example also proof of having followed the integration course?' Literally you could say 'no', because it doesn't prove you have followed, but there was a parliamentary question about that, and the Minister [...] said that's logic ... So, I mean, it's a parliamentary question, so it's not law ... (Interview with A2, Organisation helping with applications in Belgium, 25/04/2016)*

A similar case, which we collected at the municipality level rather than at the level of the magistrates, was the evaluation of secondary degrees. The Belgian legislation specifies that 'diplomas' taught in one of the national languages and within the EU can be used to prove knowledge of the national language—which one of the interviewees interpreted as excluding secondary degrees which are not qualified as 'diplomas' as they are more oriented towards professional formation.

*you have two types of school degree. A certain type gives you just a certificate, attestation. Others give you a diploma, and it's only a diploma that is valid. Many people also follow part-time education, normally high school is six years, while many young kids come here and just follow 2-3 years part-time education. And then we cannot accept it as proof of 'school'. It's like adult professional education. We struggled with that a long time, and it's only recently [...] that we got a clarification from [the] parlet.*

(Interview with V2, civil register in Belgium, 24/05/2016)

It is worth noting that while in this case, a clarification was given by the local magistrates on what was an acceptable degree, discussion on what is a diploma and what kind of degree can be accepted showed different interpretations across the Belgian territory.<sup>10</sup>

A third example of the issues in defining requirements through documents is linked to the birth certificate that needs to be included in every application: the Belgian legislation states that

the certificate needs to be *original* and *recent*. Apart from the cost that obtaining a recent birth certificate poses for applicants from the more remote countries (cf. Peset 2023), some interviewees have observed how this can create issues for applicants from countries (e.g., some countries in Eastern Europe) in which only one 'original' birth certificate is produced at birth, and all the others are technically 'copies'.

Across these cases, the constant is the focus on identifying the 'right documents' in a context in which the nationality legislation is highly codified, the fulfilment of requirements is largely delegated to the possession of documents, and the agents are limited in their discretion. Indeed, while the latest reform of the nationality legislation in 2012 has oriented it towards integrationism, the powers given to the agents have not been expressed in terms of the verification of integration as such, but rather in terms of control of pre-defined documents (cf. Sredanovic 2020, 2022b).

In the United Kingdom, a different relation to the documents is partly linked to the legislation, but shows also a greater role played by the internal organisation of the Home Office. In the interviews we have conducted at the Home Office, indeed, one of the main points highlighted has been the strong attention towards the identification of fake documents (on this, see also Fortier 2021; Badenhoop 2023). This is shown firstly in the attention given to checking the documents: our interviewees discussed often the time spent in ensuring that the documents they had were authentic, focusing their suspicion on formats they did not see before and to a degree targeting specific national groups, such as Bangladeshis (Sredanovic 2022b). Second, the suspicion of fraud goes beyond the documents themselves, extending to signs within the documentation that are not considered convincing. For example, the interviewees mentioned that when they examine the tests completed by applicants, rapid completion times from applicants whose English proficiency is in doubt could raise suspicion of fraud.<sup>11</sup> Similarly, a degree from a university considered 'too good' in relation to the profile of the applicant could bring further checks. At the level of NCS, similar concerns were also expressed in the case of applicants who provided language or citizenship test certificates that were obtained from distant test centres. In situations where NCS agents were concerned about the authenticity of certificates or diplomas, they would report to the Home Office by submitting a request for further investigation (Fargues 2019a).

Nationality attribution in the UK is largely a concession rather than an as-of-right procedure; moreover, while refusals need to be motivated, the burden of proof is on the applicant, and the right to appeal is relatively limited. As a consequence, Home Office agents can make a wider use of refusals when they are not entirely convinced by an application. At the same time, the centralised Nationality Checking Team in Liverpool was more oriented towards standardising, in particular through internal guidance, the evaluation of applications, rather than towards using the large discretion given by the letter of the law to conduct ad hoc evaluation of the applicants' suitability (Sredanovic 2022b). As a consequence, the main logic in relation to the documents was not so much looking for a convincing proof of integration, but rather filtering out applicants who did

not meet the formal requirements, or who could be suspected of using unauthentic documentation.

In France, similar concerns existed regarding the authenticity of documents provided by applicants, particularly civil status documents. Specific controls were in place for these documents, such as legalisation and *apostille* (apostil).<sup>12</sup> These controls were mandatory for naturalisation applicants from countries with which French authorities had not concluded agreements on the mutual recognition of authentic documents, while applicants from EU countries and most former French colonies were exempt. At the time of the fieldwork, ‘fraud correspondents’ had even been appointed within each prefecture, including nationality services. These correspondents were responsible for verifying the authenticity of documents submitted by applicants and could refer problematic cases to departmental referees.

However, in the discourse of the prefectural officials interviewed, suspicions of fraud tended to focus more on the applicants’ declarations rather than the documents they provided. Civil servants specifically mentioned paying close attention to applicants’ declarations regarding their family situation, particularly the presence of their children in France or their country of origin.<sup>13</sup> In this context, suspicions sometimes targeted specific categories of immigrants, especially those from sub-Saharan Africa, echoing a narrative often seen in public debates regarding nationals from African countries, who are associated with the threat of mass immigration to France due to perceptions that they necessarily have large families (Fargues 2019b).

Although suspicions of fraud exist within French prefectures, document control for naturalisation is primarily part of a logic of proving ‘proper’ integration. Scholars have underlined that this proof of integration is understood differently depending on the applicant’s profile, with Muslim applicants being subject to specific tests aimed at verifying their adherence to the ‘values of the Republic’ (Hajjat 2012; Fargues, Pélabay, and Sénac 2023). In the context of document control though, this targeting does not necessarily manifest in the same way.

The proof of good integration through documentation can revolve around various aspects, including ‘linguistic assimilation’. As previous research has shown, there tends to be a ‘confusion between administrative skills and language skills’ and measuring assimilation also involves assessing the ability to produce a ‘good dossier’ (Hajjat 2012, 190—our translation). Already at the stage of registering applications, prefectural agents seek to assess ‘the candidate’s ability to understand administrative writing and to follow administrative rules, which in turn reflects their disposition towards the legitimate culture’ (Hajjat 2012, 190—our translation; see also Mazouz 2017). Since the introduction of language tests or other documentary requirements (such as diplomas obtained in French) in 2011, prefectural agents are not the only actors involved in assessing applicants’ linguistic assimilation, which was previously the main purpose of interviews. However, in certain circumstances—notably when a test or other document was submitted but the expected B1 level was not confirmed in the eyes of the official examining the

application—prefectural agents were required to fill in a special form to assess linguistic assimilation. Within the French prefectures, the outsourcing of the assessment of language skills in access to nationality procedures had not completely removed the traditional competence of prefectural agents in this matter. The assessment of language skills was still considered an essential element in verifying the good integration of applicants, starting from the submission of their dossiers.

In addition, the fieldwork in France also revealed that prefectural agents were able to request additional documents that did not necessarily appear on the official lists provided by the ministry of the interior or the prefectures themselves. These requests for additional documents were interpreted as necessary to carry out further checks on the integration of applicants, beyond the cultural aspects related to French language skills or knowledge of French society. To take but one example, at PR1, prefectural officials involved in examining applications for nationality by marriage sometimes requested additional documents such as pay slips, even though, unlike naturalisation, there is no requirement to have a certain level of financial resources to obtain nationality by marriage (see Fargues 2020). Such requests were presented as a means of assessing the applicants’ overall integration into French society, including their ability to support themselves financially, as illustrated by this interview:

Fargues: *So you are going to ask for pay slips, even though they are not on the list of documents that candidates are expected to provide?*

O.: *Yes, but the current list sucks. The previous one was better [i.e. pay slips were on the previous list, which was edited by the former head of PR1]. People think it's easy to get French nationality through marriage, but it's not. We do a lot of research, we're entitled to go quite far into applicants' privacy, that's how we distinguish between those who can integrate [into French society] and those who can't. (Interview with O., prefectural agent at PR1, 12/01/2017)*

In contrast with Belgium or the United Kingdom, the verification of documents in France tends to follow a ‘logic of conviction’. Through the paperwork they provide, applicants are expected to convince prefectural agents of their linguistic assimilation and overall integration into French society. The way access to nationality procedures have been recently reorganised in France, giving more power to prefectural agents in the decision-making process, coupled with the increased emphasis on integration in public discourse and administrative guidelines (see Fargues, Pélabay, and Sénac 2024) certainly contributed to reinforcing this logic of conviction.

## 7 | Discussion and Conclusion

Across this article, we have shown how the need to evaluate documents, with some degree of discretion, is part of the implementation of nationality policies in Belgium, France and



the United Kingdom. Specifically, such evaluation can be relevant both at the stage of introduction of a nationality application, as well as at the moment of its actual formal evaluation. We have further shown how the implementation of the respective policies can be seen as following different logics in each country. This means looking for the ‘right documents’ in Belgium—interpreting legal requirements and deciding whether degrees or integration certificates, for example, fulfil such norms. It focuses on ‘convincing documents’—a complex examination based on an only partially defined idea of assimilation—in France. In the United Kingdom, the dominant logic is that of the ‘authentic documents’—an attempt to avoid potential fraud, in terms of potentially fake documents, but also for example in terms of test results that the officers consider suspicious. Comparing such results with the institutional context can allow to explain some differences: Belgium has less discretion in the letter of the law than the United Kingdom and France, and both Belgium and France have a higher access to judicial review. However, these differences do not explain, for example, why the similarly positioned officers in the United Kingdom and France diverge in their practices, focusing more on fraud and avoiding holistic evaluation in the British case, and explicitly pursuing holistic evaluation in the French one. Indeed, the ways in which the institutions involved have organised their work, and the practical logics of everyday implementation, are also needed to understand the origin of a specific logic.

The three logics we have identified are ideal-types that do not exhaust the data we have collected in each country. We have for example encountered discussions in the United Kingdom, which were oriented towards what were the ‘right documents’ according to the norms, rather than towards the authenticity of the document (cf. also Fortier 2021); always for example, we have encountered a civil register in Belgium that directed the applicants to build a ‘convincing’ dossier for the local magistrates (Sredanovic 2020). However, such ideal-types do not only allow us to reconstruct the dominant logics in the specific policy domain of nationality, as it is implemented in the three countries considered. They also show the tension we have mentioned in the introduction, between paper and ‘the real world’, the map and the territory, the letter of the norm and actual practice. While documents can be considered more stable and unambiguous, compared with the malleability of practice, it does not mean that they strictly delimit the discretion of practice. Yet, documents cannot simply be equated with another form of discretion—the introduction of documental requirements, from degrees to tests to fiscal documentation, can be considered a limitation to the discretion of earlier naturalisation procedures (Sredanovic 2024). However, even a case such as the Belgian nationality legislation, in which the orientation towards documents was explicitly a measure to limit discretion (Sredanovic 2022a), shows how documents open other practices that are at least diverging in interpretation, if not opening to discretion.

Such a consideration has wider implications for this specific component of policy implementation. While we have already theorisations of how the practice is translated in documents to make it appear in line with the letter of the law (e.g., Dubois 2012), there is less reflection on how everyday implementation is done around, with and through documents. The ideal-types we

have identified constitute also potential tools that could be translated and tested to other policy domains. The ‘authentic documents’ logic might be the one more specific to migration policies, where concerns about potential fraud by migrants have become increasingly prevalent in recent years (see e.g., Fargues 2019b). However, questions of authenticity can be relevant for other policy domains as well, where suspicions of fraud are not necessarily exclusively directed against migrants, such as in welfare schemes (see e.g., Fenger and Simonse 2024). The ‘convincing documents’ and ‘right documents’ logics seem more generalisable and the prevalence of one or another might be an indication of how discretionary a policy domain is. The ‘right documents’ logic might be more likely to show up for policies that are highly codified, straightforward and low-discretion. On the other hand, the ‘convincing documents’ logic may be more likely in complex or discretionary policies, where evaluations can vary significantly from case to case. However, our analysis also shows that the nature of the policy does not necessarily dictate how documents are used.

As mentioned, all three countries considered are former colonial powers. The United Kingdom still has partial citizenship statuses of colonial origin (cf. Sredanovic 2017), and France has a facilitated discretionary procedure for people originating from former French domains (cf. Blanchard et al. 2024), while in Belgium, post-colonial procedures have been historically limited (Sredanovic 2022a). However, we have not found signs that former colonial subjects are systematically treated differently by the bureaucracies in the control of their documentation. That said, suspicions of fraud can be directed against certain categories of naturalisation applicants, such as those originating from African countries in France—with suspicions going beyond the control of their documents—and Bangladeshis and Albanians in the United Kingdom, particularly if former asylum seekers (Fargues 2019b; Sredanovic 2022a). As for EU citizens, they can be advantaged in the consideration of some documents that are relatively standardised across the EU, such as degrees, but in the United Kingdom, they can also find themselves lacking some of the paper trail that most other migrants have (Sredanovic 2023—cf. also Gargiulo 2024).

Future research on the practices related to documents, on other migration-related policies, but even more so on policies in entirely different domains, would have the potential to improve significantly our understanding on how administration and policies work.

### Acknowledgements

Sredanovic’s research was made possible by a postdoctoral fellowship conducted at the Migration Asylum Multiculturalism (MAM) and the GERME research groups of the Université Libre de Bruxelles funded through an Action de recherche concertée of the Fédération Wallonie-Bruxelles. Fargues’ research was supported by a doctoral grant awarded by the *Fondation nationale des sciences politiques* (FNSP) at Sciences Po Paris, along with two visiting fellowships at the London School of Economics and Political Science and the University of Oxford in 2016 and 2017.

### Data Availability Statement

The data that support the findings of this study are available on reasonable request from the corresponding author. The data are not publicly available due to privacy or ethical restrictions.

## Endnotes

- <sup>1</sup> To protect the anonymity of the civil servants working in these services, we are not naming the precise places. We have also organised the interviews with a primary focus on participants' ordinary routines in their places of work, rather than centring on their specific background and opinions—this has limited the kind of personal information collected in the first place.
- <sup>2</sup> NCS have since been abolished in 2018, with a more limited service now offered through public libraries (Fortier 2021; Sredanovic 2022a).
- <sup>3</sup> In addition to the prefectures examined by Fargues (2019a), other prefectures organised the registration of nationality applications differently. For example, certain prefectural boards required that applicants have their documents verified by local associations, called *Points d'information médiation multiservices* (PIMMS), closely cooperating with the French government to 'facilitate access to public services'.
- <sup>4</sup> Personal communication of statistics by the SDANF to Fargues (2016).
- <sup>5</sup> In France, official statistics on naturalisation refusals used to be published in yearly reports from the SDANF until 2006—the figures did not include 'refusals at the counter' though. Since the SDANF came under the control of the ministry of the interior, the publication has stopped.
- <sup>6</sup> A question from the Client Care Record that NCSs users were asked to sign after reading by the registrar checking the application was specifically designed so that individuals could not hold the NCSs accountable if their application was rejected by the Home Office due to illegal entry into the territory ('Have you ever been in breach of immigration rules?').
- <sup>7</sup> An indirect estimation of the impact of NCSs can be obtained from the official statistics of the Home Office, which distinguish 'rejected' applications from the 'refused' applications that underwent a deeper evaluation. NCSs were introduced in 2005 and abolished in 2018. The number of rejected and withdrawn applications decreased (to under a thousand per year) between 2008 and 2015 before rising again, surpassing 6000 in 2023. This increase has been particularly sharp since the digitisation of application registration in 2018.
- <sup>8</sup> See footnote 3 on PIMMS.
- <sup>9</sup> Belgium has different integration policies for Flanders, Wallonia, Brussels and the Germanophone community, each producing their own sets of integration course certificates. In the case of the Wallon integration course for example the language component can also be omitted (Sredanovic 2022a), but, as the courses were still in their first steps when we conducted the interviews with nationality institutions, the specific issue did not emerge in the data collected.
- <sup>10</sup> Variations in the kind of diplomas accepted as proof of linguistic competence has been shown also for naturalisation procedures in Germany and the Netherlands by van Oers (2014).
- <sup>11</sup> This is also linked to a specific scandal in which Language Testing Centres have been accused of providing fraudulent test certificates, a scandal that has had repercussions beyond nationality, with for example a large number of student migrants expelled because they underwent a test in a suspect centre, even without any specific proof of individual fraud (cf. Harding, Brunfaut, and Unger 2020).
- <sup>12</sup> Like legalisation, an apostil certifies the authenticity of a signature and the authority of the official issuing the document. However, unlike legalisation, the apostil is issued by an authority designated by the state in which the document was created.
- <sup>13</sup> French nationality law indeed stipulates that naturalisation applicants should have the centre of their family interests in France and thus have their children and spouse living with them in the country.

## References

- Alpes, M. J. 2017. "Papers That Work: Migration Brokers, State/Market Boundaries, and the Place of Law." *PoLAR: Political and Legal Anthropology Review* 40, no. 2: 262–277.
- Ambrosini, M. 2021. "The Battleground of Asylum and Immigration Policies: A Conceptual Inquiry." *Ethnic and Racial Studies* 44, no. 3: 374–395.
- Badenhoop, E. 2023. *Calling for the Super Citizen. Naturalisation Procedures in the United Kingdom and Germany*. Basingstoke: Palgrave Macmillan.
- Blanchard, E., L. Guerry, L. Kesztenbaum, and J. Lepoutre. 2024. "La réintégration, une façon de redevenir français." *Population & Sociétés* 619: 1–4.
- Borrelli, L. M., and S. Andreetta. 2019. "Introduction: Governing Migration Through Paperwork." *Journal of Legal Anthropology* 3, no. 2: 1–9.
- Borrelli, L. M., and A. Lindberg. 2019. "Paperwork Performances. Legitimizing State Violence in the Swedish Deportation Regime." *Journal of Legal Anthropology* 3, no. 2: 50–69.
- Dimitradis, I., M. H. J. Hajer, E. Fontanari, and M. Ambrosini. 2021. "Local "Battlegrounds". Relocating Multi-Level and Multi-Actor Governance of Immigration." *Revue Européenne des Migrations Internationales* 37, no. 1–2: 251–275.
- Dubois, V. 2012. "Ethnographier l'action publique. Les transformations de l'État social au prisme de l'enquête de terrain." *Gouvernement & Action Publique* 1, no. 1: 83–101.
- Dworkin, R. 1977. *Taking Rights Seriously*. Cambridge, MA: Harvard University Press.
- Fargues, É. 2019a. "Exclu-es de la naturalisation. Analyse des frontières de la « communauté nationale » en France et au Royaume-Uni." PhD Dissertation in Political Science, Sciences Po Paris.
- Fargues, É. 2019b. "Simply a Matter of Compliance With the Rules? The Moralising and Responsibilising Function of Fraud-Based Citizenship Deprivation in France and the UK." *Citizenship Studies* 23, no. 4: 356–371.
- Fargues, É. 2020. "The Making of 'Self-Sufficient' Citizens: The 'Civic Turn' and the Neoliberal Vision of Integration in the French Naturalisation Process." *Revue Européenne des Migrations Internationales* 36, no. 4. <https://doi.org/10.4000/remi.20915>.
- Fargues, É., J. Pélabay, and R. Sénac. 2024. "The Contemporary Uses of the 'Values of the Republic' in the French Naturalisation Process." *Journal of Ethnic and Migration Studies* 50, no. 18: 4563–4580.
- Fenger, M., and R. Simonse. 2024. "The Implosion of the Dutch Surveillance Welfare State." *Social Policy & Administration* 58, no. 2: 264–276.
- Fortier, A.-M. 2021. *Uncertain Citizenship: Life in the Waiting Room*. Manchester: Manchester University Press.
- Frost, L. 2024. "Ambiguous Citizenship Policies: Examining Implementation Gaps Across Levels of Legislation in Jordan." *Comparative Migration Studies* 12: 23. <https://doi.org/10.1186/s40878-024-00375-2>.
- Gargiulo, E. 2024. "Internal Status Borders: Municipal Registration Between Emancipation, Exclusion and Omission in Italy." *Ethnic and Racial Studies* 47, no. 12: 2499–2519.
- Giddens, A. 1987. "The Nation-State and Violence." In *Volume 2 of a Contemporary Critique of Historical Materialism*. Berkeley Los Angeles: University of California Press.
- Goodman, S. W. 2010. "Integration Requirements for Integration's Sake? Identifying, Categorising and Comparing Civic Integration Policies." *Journal of Ethnic and Migration Studies* 36, no. 5: 753–772.

- Hajjat, A. 2012. *Les Frontières de l'«identité nationale»: L'injonction à l'assimilation en France métropolitaine et coloniale*. Paris: La Découverte.
- Harding, L., T. Brunfaut, and J. W. Unger. 2020. "Language Testing in the 'Hostile Environment': The Discursive Construction of 'Secure English Language Testing' in the UK." *Applied Linguistics* 41, no. 5: 662–687.
- Hull, M. S. 2012. *Government of Paper: The Materiality of Bureaucracy in Urban Pakistan*. Berkeley: University of California Press.
- Lipsky, M. 2010. *Street-Level Bureaucracy: Dilemmas of the Individual in Public Service*. 30th ed. New York: Russell Sage Foundation.
- Lyon, D. 2009. *Identifying Citizens: ID Cards as Surveillance*. Cambridge: Polity.
- Mazouz, S. 2017. *La République et ses autres: Politiques de l'altérité dans la France des années 2000*. Lyon: ENS Éditions.
- Peset, C. 2023. "Acquérir la nationalité belge par déclaration. Une analyse sociologique d'un parcours du combattant en Région Bruxelles-Capitale." Master's thesis, Université libre de Bruxelles.
- Pratt, A. C. 1999. "Dunking the Doughnut: Discretionary Power, Law and the Administration of the Canadian Immigration Act." *Social & Legal Studies* 8, no. 2: 199–226.
- Scott, J. C. 1998. *Seeing Like a State: How Certain Schemes to Improve the Human Condition Have Failed*. New Haven, CN: Yale University Press.
- Siblot, Y. 2006. *Faire valoir ses droits au quotidien. Les services publics dans les quartiers populaires*. Paris: Presses de la FNSP.
- Spire, A. 2005. *Étrangers à la carte: L'administration de l'immigration en France, 1945–1975*. Paris: Grasset.
- Spire, A. 2008. *Accueillir ou reconduire: Enquête sur les guichets de l'immigration*. Paris: Raisons d'agir.
- Sredanovic, D. 2017. "Was Citizenship Born With the Enlightenment? Developments of Citizenship Between Britain and France and "Everyday Citizenship" Implications." *Miranda*: 15. <https://doi.org/10.4000/miranda.11118>.
- Sredanovic, D. 2020. "Barriers to the Equal Treatment of (Aspirant) Citizens: The Case of the Application of Nationality Law in Belgium." *International Migration* 58, no. 2: 15–29.
- Sredanovic, D. 2022a. "Variable Filters: Local Bureaucracies in Citizenship and Nationality Procedures in the UK and Belgium." In *Migration Control in Practice: Before and Within the Borders of the State*, edited by F. Infantino and D. Sredanovic, 181–198. Bruxelles: Éditions de l'Université de Bruxelles.
- Sredanovic, D. 2022b. *Implementing Citizenship, Nationality and Integration Policies: The UK and Belgium in Comparative Perspective*. Bristol: Bristol University Press.
- Sredanovic, D. 2023. "The Vulnerability of In-Between Statuses: ID and Migration Controls in the Cases of the 'Windrush Generation' Scandal and Brexit." *Identities* 30, no. 5: 625–643.
- Sredanovic, D. 2024. "Standardised Integration Requirements for Naturalisation: Less Rights and Less Discretion? A Meta-Analysis of Ethnographic Studies of Naturalisation Procedures in Europe." *Comparative Migration Studies* 12: 33.
- Szreter, S., and K. Breckenridge. 2012. "Recognition and Registration: The Infrastructure of Personhood in World History." In *Registration and Recognition: Documenting the Person in World History*, edited by K. Breckenridge and S. Szreter, 1–36. Oxford: Oxford University Press.
- Tarshish, N., and R. Holler. 2024. "'You Didn't Ask, so You Don't Know': Information and Administrative Burden in Social Benefit Claims." *Social Policy & Administration* 58, no. 5: 800–813. <https://doi.org/10.1111/spol.12992>.
- Torpey, J. 1999. *The Invention of the Passport: Surveillance, Citizenship and the State*. Cambridge: Cambridge University Press.
- Tuckett, A. 2018. *Rules, Paper, Status: Migrants and Precarious Bureaucracy in Contemporary Italy*. Stanford, CA: Stanford University Press.
- van Oers, R. 2014. *Deserving Citizenship: Citizenship Tests in Germany, The Netherlands and the United Kingdom*. Leiden: Nijhoff.
- Vetters, L. 2019. "Administrative Guidelines as a Source of Immigration Law? Ethnographic Perspectives on Law at Work and in the Making." *Journal of Legal Anthropology* 3, no. 2: 70–90.
- Wautelet, P. 2014. "La nationalité belge en 2014—l'équilibre enfin trouvé?" In *Droit de l'immigration et de la nationalité: fondamentaux et actualités*, edited by P. Wautelet and F. Collienne, 274–382. Bruxelles: Larcier.