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Stakeholder citizenship: the complexities of Polish migrants' citizenship attachments in the context of the Scottish independence referendum

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ABSTRACT

This article focuses on the experiences of Scotland's largest foreign-born minority group, namely Poles, in the run-up to the Scottish independence referendum in 2014. We draw on 20 in-depth interviews to explore our participants' intentions and justifications for voting (or not) in the referendum. We found that our participants tended to emphasise the *jus domicili* principle when justifying their eligibility to vote in the referendum. However, our participants extended the *jus domicili* principle in their justifications to also include the intention to stay in Scotland as a central aspect of their continuing stake in (and right to vote in the referendum to determine) Scotland's future. Through exploring our participants' justifications for voting in the referendum, we were able to examine and better understand how migrants constitute their citizenship through articulating their substantive attachments (social, economic and relational or familial) in their adoptive country and in their country of origin.

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Introduction

While voting rights have traditionally been associated with citizenship, migration has undermined the traditional ideas about how citizenship, residence and voting rights are connected. By crossing territorial borders, migrants create populations of foreign residents inside, and expatriate citizens outside the state territory. As a result, the inhabitants of nation-states do not share the same citizenship rights. For that reason, Beckman (2006) indicates that the association of voting rights with citizenship works more in the direction of political exclusion and citizenship itself has become a source of unequal rights amongst inhabitants of the same country. This article engages with the debates concerning the relationship between citizenship attachments, status and residence by examining Polish migrants' citizenship attachments in the context of the historic event of the Scottish independence referendum in September 2014. While the debates on external voting rights and citizenship attachments tend to focus on expatriates and non-citizen residents, this article will only concern the

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second group, namely Polish migrant residents in Scotland and their citizenship attachments in the context of Scottish independence referendum. This article will thus explore how Polish migrants justify and articulate their sense of voting rights in this referendum.

On 18 September 2014, people in Scotland voted in the Scottish independence referendum. The terms of the referendum were agreed between the UK Government and the Scottish Government in October 2012. The eligibility criteria for voting in the independence referendum introduced in the Scottish Independence Referendum (Franchise) Bill were based on the franchise for Scottish Parliament and local government elections (which is set out in Section 2 of the 1983 Act). Accordingly, the voters of the independence referendum included the UK citizens aged 16 or above, who are habitually resident in Scotland. It also included Irish citizens, Commonwealth citizens (who are eligible to vote in general UK elections) and EU nationals who are habitually resident² in Scotland. UK citizens who were not habitually resident in Scotland were however excluded from voting in the independence referendum. As a result, Poles as EU citizens were invited as a consequence of the sub-national electoral rights in the EU to become active participants in deciding of Scotland's future through the independence referendum. By examining migrants' intentions and experiences in the context of this referendum, this article will present migrants' perspectives on the normative principles that they consider pertinent with regard to the inclusion of foreign residents in this historic referendum.

The debates on the membership of the demos seek to define the general principles of who should be included (as well as excluded) in the demos. By examining the normative principles of inclusion in the demos, political scientists have tried to answer the question whether it is possible for the demos to determine its own boundaries through the democratic procedures or application of democratic principles (see: Bauböck 2005, 2009, 2010; Beckman 2012). In answering this question, political scientists tend to refer to the 'all affected' principle to articulate that all individuals who are affected and/or are subject to the rules of a government, should also democratically elect their country's leaders. The term 'affected' however is often subject to debate and diverse interpretations. For example, Beckman (2006) refers to contributivist, causal and legal views to suggest that all 'affected' are those who have a financial or economic stake in a polity (contributivist view), or those whose life prospects are affected by the laws and policies of a polity (casual view) and those who are subject to the legal authority of a government (legal view). The all-affected principle has also been largely criticised for its over-inclusiveness and therefore being indifferent with regard to the boundaries of membership. However, Beckman (2006) argues that the vagueness of the all-affected principle is no obstacle in assessing whether foreign resident should have voting rights. This is because, according to Beckman, the rights of foreign residents to participate in the democratic processes refer to all three (contributivist, causal and legal) interpretations of this principle.

In order to resolve the over-inclusiveness of the all-affected principle, Bauböck proposed the 'stakeholdership principle', which is best described as expressing an interest in membership that makes an individual's fundamental rights dependent on the protection of a particular polity and that ties an individual's well-being to the common good of the polity (2005, 686). With the stakeholder principle, the criteria for inclusion derive from the link between the individual's life prospects and the common good of the political community. Following from Bauböck, those individuals who have a stake, depend on the political community for the long-term protection of their basic rights (dependency criterion), or have

been subjected to that community's political authorities for a significant period of time over the course of their lives (biographical subjection criteria) (2009, 479). Bauböck's biographical subjection criteria correspond with Beckman's causal and legal interpretations of the all-affected principle. As such, individuals who have a stake in the political community should have a claim for the citizenship rights including the voting rights in that community. The stakeholder principle proposed by Bauböck (2005, 2007, 2009) resolves some of the problems of the over-inclusiveness of the all affected principle, by stressing that not all those 'affected' have individual interests linked to the common good of the political community or have been long-term subjects of the political community. While Bauböck (2009) provides criteria (dependency and biographical subjection) for defining stakeholdership, the understanding of stakeholdership from the perspective of the stakeholders still requires further investigations.

While Bauböck (2009) argues for voting rights to be an integrated part of citizenship status, Kostakopoulou (2008) proposed replacing citizenship with the civic registration of residents in the area of one's domicile. Kostakopoulou's proposal privileges the principle of *jus domicili* (rights based on residency) and the reality of residence in determining citizenship rights, including voting rights. By examining the future of the citizenship attributions, Kostakopoulou (2008) argues for citizenship to be based on a shared future, in this context – the factual residency and intension of making a place a permanent home, rather than shared past – in terms of, for example, prolonging ethnicity or nationality. Similar to Kostakopoulou, Isin (2013) articulates the importance of a shared future in defining citizenship. Isin argues that citizens are engaged in creating their status rather than following predetermined scripts and thus citizenship should be understood as 'a process through which subjects, by claiming their rights, and regardless of their citizenship status, constitute themselves as citizens' (Isin 2009, 383). While Kostakopoulou focuses on the relation between citizenship and residency, Delanty (1997) theorises diverse forms of citizenship that go beyond the spatial domain of residency. Delanty argues that citizenship is more than rights and other dimensions such as duties, responsibilities, participation and identity should also be included in the definition of citizenship. These dimensions, according to Delanty, express the different aspects of what membership of a political community entails (1997).

Given the complexity of citizenship attributions as well as the importance of the debates about how membership in democracy should be defined, our research responds to the need for further research to understand the eligibility criteria underpinning stakeholdership in a given political community from the perspective of migrant stakeholders. While political scientist tend to refer to the political theory and legal frameworks in supporting or rejecting electoral rights beyond citizenship, this study focuses on the experiences, discourses and practices of foreign residents, namely Poles in Scotland in the context of Scottish independence referendum. By so doing, it focuses on Polish migrants forms of citizenship attachments and potential corresponding obligations to participate in this political community by examining their justification for having voting rights and voting their intentions in the Scottish independence referendum. This article therefore investigates how Polish migrants reflect upon being a stakeholder in the Scottish independence referendum and whether the dependency, biographical subjection and contributist criteria are pertinent in migrants' perspectives on their participation in the referendum. This article will contribute to debate on citizenship attachments by examining insights derived from migrants' narratives and

thus providing a greater understanding of how migrants define and justify their intention to 'act on' their attachment to the political community.

The data presented in this paper derive from the study funded by the Economic and Social Research Council (RES-625-25-0001). The findings presented in this article are based on 24 semi-structured interviews with post-accession³ Polish migrants in Edinburgh and Glasgow, who were eligible to vote in the Scottish independence referendum. Polish migrants were selected for this study because they are the largest foreign-born minority group in Scotland (55,231 in 2011). Both cities, Glasgow and Edinburgh, were selected for this study as according to the National Population Census in 2011 they experienced the highest concentration of Polish migrants living in those areas, with 13,000 Polish migrants living in Edinburgh and 8305 of Poles living in Glasgow. Participants included in this study were selected in response to an online survey. The survey questionnaire was distributed through diverse channels including Polish community organisations, Polish businesses and Polish online networks across Scotland. Our interview sample was selected from the list of volunteers who expressed their interest in taking part in the follow-up interviews and from participants contacted directly by the research team. Participants (12 interviews in each location) varied in terms of gender, age, education, marital and employment statuses. The purpose of the interviews was to explore Polish migrants' forms of engagement, attitudes, experiences, opinions and perceptions in relation to their participation in the independence referendum. The interviews thus provided an opportunity to gather data on how Polish migrants give meaning to their experiences and how these meanings are illustrative of their stakeholder status in Scotland (and in the UK), as well as, in some cases, their stake in European citizenship. A thematic analysis of the interview transcript was undertaken using a technique advocated by Boyatzis (1998). Initially, an overview thematic grid was produced to identify and collate the migrants' views on the topics discussed. Relevant sections of the transcripts were then assigned appropriate thematic codes and refined sub-categories emerged.

The paper will include three sections focusing on data analysis. In the first section, the focus will be on Polish migrants' justifications for voting rights in the Scottish independence referendum. This section will explore the extent to which dependency, biographical subjectivity and contributist criteria are pertinent in migrants' perspectives on their participation in the referendum. The second section will focus on Polish migrants' articulation of their stake and their appreciation of their stakeholder status and its implication on their voting intentions in the independence referendum. The final section will examine the diverse forms of Polish migrants' membership entitlements in distinct political communities.

Polish migrants' justifications for voting rights in the Scottish independence referendum

The franchise for the Scottish independence referendum followed the criteria employed to determine eligibility for voting in the local government elections in Scotland. As a result, the principle of *jus domicili* was central in determining the franchise in the referendum (Scottish Government 2012). Residence criteria were also pertinent in our participation justifications of their voting rights in the independence referendum. Long-term residence in Scotland but also the intention to stay in Scotland were indicated by our participants, such as Mariusz, as key criteria for having a say in the independence referendum:

If you're not planning on staying here but you decide to vote, and you play a trick on somebody, then I think it's inappropriate. (...) I would prefer if all immigrants were given the right to vote after five years of living and getting to know this country, and not after a year. After five years you can identify yourself with a region or town.

Mariusz, 41, a driver, Glasgow

Mariusz explains that the rights to vote should be given to those individuals who are living in the country of residence for several years and have the intention to reside there permanently. From Mariusz's perspective, a certain period of time (five years) was required to accumulate the necessary knowledge of social and cultural rules, norms and regulations and thus contribute to a migrants' ability to make an accountable decision in the referendum. Obtaining voting rights according to Mariusz (as well other participants) required meeting the requirements of long-term residence and the intention to settle in the country of their residence. This justification reflects Bauböck's (2009) biographical subjection criteria that migrants' long-term and intentioned permanent residency result in their individual interests being linked to the common good of the community in which they reside. Our participants' intentions to stay also correspond with Bauböck's dependency criteria for establishing individuals' stakeholderhood, where those individuals (and only those) who depend on that community for long-term protection of their basic rights (2009, 479) should have access to certain citizenship rights. For that reason, those participants who despite being residents for a number of years but were uncertain about their continuing residence in Scotland in the future, took an 'ethical stance' on whether they should participate or not in the referendum. For example, Adam who was undecided about a potential move to Finland at the time of the interview expressed his ethical dilemma over participation in the independence referendum:

I don't know yet, because if I was to go away, then I don't think ethically I have the right to do so. If I stay, then absolutely, I'll be voting.

Adam, 32, a driver, Glasgow

From Adam's perspective, those migrants who are planning to move away from Scotland, and therefore no longer link their personal interest with this country, should not be eligible to vote in the referendum or hold the voting rights.

For our participants, being a resident in Scotland also refers to the fact of being a subject to the laws and policies of their country of residence. For example, Olek indicated that as a resident in Scotland, he is subject to the policies of his country of residence and therefore should participate in their making:

Firstly, I live in this country and, as I say, I'm planning to stay here for now. I'm planning my future here and so whether Scotland becomes independent or stays within the UK, it'll affect people's lives and the entire society, and it will also affect me.

Olek, 33, a researcher, Edinburgh

Here, the perception of migrants' right to vote in the independence referendum is justified by the fact that they have been subjected to political authorities in Scotland (which we refer to as 'subjection biographical criteria') for a significant period over the course of their lives. As the outcome of the referendum will affect our participants' life prospects, they feel justified in taking part in the referendum. In so doing, our participants emphasise the 'subjection' and the 'biographical' alongside the 'length of stay' criteria in their justification of their stakeholderhood with regard to the referendum. The rationale provided by Olek implies

that being a subject of a government's (or a future government's) policies and laws entails rights to participate in their making. A similar view was shared by Adam:

Those who are directly concerned and will be affected should have the right to vote. I think it's really good that the right to vote is given to people who live here. (...) I agree with the rule that those who are directly concerned and who live here have the right to vote, regardless of the passport they hold.

Adam, 32, a driver, Glasgow

Both Olek and Adam argued that being affected and subjected to laws, policies and legislation of a country or future country provide a reasonable justification for their voting rights in this independence referendum. Both responses suggest that it is reasonable that individuals who are subjected to the state politics over significant period of time should be eligible to participate in collective decision-making processes regardless of their nationality.

The participants further 'unpacked' the biographical subjection criteria presented by Bauböck (2009) by demonstrating the links with and commitment to their country of residence through their contributions to Scottish society. For example Daniel articulated a number of economic, social and cultural contributions that Polish migrants make in Scotland:

We live here, we pay taxes, we participate in public life, I think it's actually advisable for us to take part in issues that are important. It's very important and for this reason we should vote, we will live here so we should vote and have an influence on shaping the reality, a lot of people are here long term. They start families, they have children here, they take decisions for the next generation, if you live here and your children are born in this country, they will be a part of this society, there will be an element of Scottish culture in them so people should definitely participate and vote.

Daniel, 32, a web designer, Edinburgh

Daniel's claim to voting rights in the referendum follows the contributivist view (Beckman 2006), where the inclusion of all foreign residents who participate in the economy and contribute to the public finances in forms of taxation, labour or property ownership, should be allowed. Daniel's justification for Polish residents in Scotland having a say in the independence referendum extends Beckman's thesis, to also include social, cultural and future demographic contributions that Polish migrants already make and could make in the future country of their residence. Indeed, Bauböck (2010) argues that membership in the polity depends not only on the fact of individuals having a 'genuine' link to that polity but also the nature of their link. This implies that foreign residents are not only subject to the legislation and policies of their country of residence but they are also affected in socio-economic terms as they establish economic links and social bonds within the country of their residence including their progeny becoming part of Scotland's future. According to Daniel, long-term Polish residents in Scotland are already integrated in their country of residence; therefore, their inclusion in the independence referendum should be expected.

Despite participants expressing perspectives supporting aspects of Bauböck's (2005, 2009) stakeholder principle in justifying their rationales for intending to act on their voting rights in the independence referendum, they did not consider these voting rights as an integrated part of 'natural' citizen rights. For example, Monika explained why she considered that the right to take part in political elections should be granted to those who are living in the country and should not be limited to only citizens:

I think that the right to vote should be given to people who live in the country and not just to its nationals; or to those who're planning to move or come back to the country (...) I'm taking

part because, even though nothing is for certain, the chances of me leaving this country are very small. I don't think I'll be going back to Poland; if anything I might move somewhere else in Scotland. For the time being I can see myself living here and so it feels totally natural to want to take part in the referendum. Scotland has is a very old country but its future lies in the hands of those who live here.

Monika, 30, a civil servant, Glasgow

The long-term physical presence in the country of residence was considered by Monika as one of the main conditions in determining who should be enfranchised in political elections. According to Monika, voting rights should be determined by *jus domicili* principle. As such, voting rights should be based on de facto presence in the territorial community, rather than by nationality. As Monika considered herself as a long-term resident with intentions to stay in Scotland, it seemed *natural* for her to have a say over Scotland's future, since she will be part of that future even if not offered 'Scottish' citizenship post-independence (if the vote had been Yes). Monika's justification provides a more nuanced appreciation of Isin's definition of citizenship 'as a process through which subjects, by claiming their rights, and regardless of their citizenship status, constitute themselves as citizens' (Isin 2009, 383). Monika's perspectives correspond to academic arguments with regard to uncoupling citizenship rights from nationality defined through the principles of *jus soli* (the right of anyone being born in the territory of state). In a sense, participants such as Monika are exhibiting an understanding and rationalisation with regard to the enfranchisement of foreign residents akin to Kostakopoulou's proposal (2008) for replacing citizenship with the civic registration of residents in the area of one's primary domicile, which is defined in terms of the intention of making a place a permanent home.

Polish migrants' sense of stakeholderhood and its implication on voting intentions in the Scottish independence referendum

While our participants were able to articulate the rationales for their enfranchisement in the independence referendum, the decision as to whether or not to take part in the referendum were more complex. Participants' decisions on casting their votes in the referendum depended on their perception as to whether they had an interest (stake) in the outcome of the Scottish independence referendum or not. With regard to how our participants perceived their interest (stake) in the outcome of the referendum, we propose the following a typology of ambivalent, withdrawal or indifferent and willing participants in the independence referendum.

The ambivalent attitudes referred to participants' inability to make a decision as to whether to cast their vote in the referendum or not. Like Adam above, Agata's dilemmas with regard to whether she should have the right to vote in the referendum is associate with her inability to decide whether her residence in Scotland is permanent:

I want to participate because I have lived here for a while now, at the same time I ask myself whether it's a fair thing to do because I can't say for sure that I'll stay here.

Agata, a social worker, 30, Edinburgh

As noted above, one of the criteria informing our participants' intention to act on their voting rights was *jus domicili*; however, this principle was considered as not enough and intention for staying permanently in the country of residence was also crucial. Despite Agata

at the point of interview did not have plans to migrate from Scotland, she was not in the position to conclusively decide whether or not she would settle in Scotland for good. Some of our participants' perspectives concurred with suggestions that the Scottish referendum franchise was over-inclusive in granting a vote to other resident EU and Commonwealth citizens. For example, some of our participants believed that their long-term residence in Scotland did not provide them with the moral and political legitimacy for taking part in the referendum. These participants tended to exclude themselves from voting in the referendum and withdrew from exercising their voting rights. For example, Jan indicated that he would not cast his vote as he did not feel eligible to do so:

I prefer to leave the decision about the future of the country to people who live here. I don't entirely understand Scotland. I don't entirely understand Scotland. I know that they had constantly fought for their freedom, so if it was to make them happy, let them be independent. It's not for me to say. I've come here to take care of my own life and it's not my place to have opinions or say what better or worse thing to do is (...) Yes, I have the right to vote but ethically... Is seven years here enough....?

Jan, 57, a warehouse operator, Glasgow

Despite Jan living in Scotland for seven years, he felt that his physical presence in the country of residence was not sufficient for acting in his voting rights and thus he decided to withdraw from participation in the referendum. Jan saw his 'connection' to Scotland in purely economic terms and as a consequence he did not consider Scotland to be 'his place' and thus he decided he should not have a say in the referendum. Similar to Jan, Jądrzej explained that he had not yet established long-term and genuine links with his country of residence and therefore he decided not to cast his vote in the referendum:

I haven't made a final decision, from the ideological point of view I would rather not vote since it's not my country, I don't feel Scottish, I don't understand their tradition

Jądrzej, 27, a warehouse operator, Glasgow

Jan and Jądrzej's narratives suggest that they have not developed sufficient forms of attachment to Scotland despite being resident for a similar length of time (about seven years) and thus expressed the attitude of indifference to referendum. In a sense, participants such as Jan and Jądrzej are also exhibiting the relevance of the stakeholder principle, as they did not feel attached to Scotland (despite both being long-term residents) and thus they both felt that they did not have a sufficient stake to participate in deciding the outcome of the referendum. This means that stakeholder principle can be matter of migrant's perception with regard to how one's stake is perceived and defined in relation to diverse forms of attachments to the country of residence. Lack of established links and thus an insufficient stake in the country of residence expressed by Jan and Jądrzej is however problematic and may stem from their lack of social and economic integration in their country of residence.

In comparison to Jan and Jądrzej, the vast majority of interviewed participants (19 out of 24) expressed their willingness to participate in the independence referendum. Similar attitudes were also outlined in our online survey that indicated the Scottish independence referendum was a very salient issue for Polish migrant residents in Scotland. The vast majority of our survey participants (208 out of 245) declared to take part in referendum (see Piętka-Nykaza and McGhee 2014). As noted above participants such as Monika, Daniel or Olek justified their intention to take part in the referendum through emphasising their social and economic links with Scotland established through their long-term residency.

Participants' decisions to vote in the referendum was also dependent upon their perceived interest (or stake) in the outcome of the Scottish independence referendum and their concerns about the UK's and Scotland's continuing membership of the EU. Indeed, the UK's and Scotland's membership of the EU was one of the main concerns of Polish residents in Scotland articulated by our participants, for example Jozef:

I could vote Yes [in the Scottish independence referendum] if I knew that the UK would leave the EU and Scotland would stay in it. I would vote Yes then. It's uncertain though whether the Tories win and it's uncertain whether they would announce the EU referendum⁴ at all, and, if they did, whether the British would decide to leave the EU. And finally, if the UK left the EU, would it have any consequences for Polish people at all...? (...) Things like the right to stay, work, ease of access to certain rights; whether we would have to apply for visa extension or whether we could simply stay like we can now....

Jozef, 31, a Ph.D. student, Edinburgh

Protection of their EU migrants rights and the lack of clarity in relation to the UK's membership of EU were central to Polish migrants' reflections on and ambivalence towards the Scottish independence referendum. As well as participants who voted to protect their stake (in terms of their rights to stay and live in Scotland or maintaining their standard of living and quality of life) some participants such as Edyta, expressed a more ambivalent attitude towards voting in the referendum and were resigned to letting others decide the future of Scotland:

If I was to vote in the referendum, I wonder what difference it would make.... I'm here and will adjust to whatever will be decided... what I am to change here....?

Edyta, 56, a cleaner, Glasgow

What our data from our admittedly small-scale research project suggest is that the concern with regard to the over inclusiveness of the Scottish referendum franchise may not in fact have resulted in an over inclusiveness effect. What was clear from our research was that participants self-excluded themselves from taking part in the referendum if they considered themselves as not to having a sufficient stake in the future outcome of the referendum. However, that being said, having the ability to take part in the referendum had further implications for enhancing some of our participants' sense of civic integration. For example, Dawid indicated that having accumulated greater 'country knowledge' in the process of engaging in referendum debates had had a positive impact on his familiarity, knowledge and attachment to his country of residence:

I also have to say that the referendum forced me to seek information and ask questions. The more I know, the more attached I feel to this country, the bigger my knowledge about this country, the more familiar and homelike it becomes.

Dawid, 29, a warehouse cleaner, Edinburgh

Other participants such as Marta perceived her voting rights in the referendum as a 'gesture' and recognition of migrants' presence and contribution to the host country:

I think it has been a token of trust on the part of the government. I think it was a very valid and positive gesture, because no matter how you look at it, the immigrants who come here not only join the army of labourers but also settle down here and contribute to the economy, plan their lives here and shape the culture of the country, and so I think they should totally have the right to vote as well.

Marta, 28, a web developer, Glasgow

Here the perception of Marta's right to vote in the referendum is regarded as a sign of appreciation and recognition of migrants as integrated members of the host community. This however emphasises the role of host countries in creating possibilities and assisting migrants in accessing their rights. For example Szymon indicates the two-way relation between migrants' civic participation and the host country creating opportunities for migrants to participate in political processes:

It's fantastic that those who live here can vote [in the referendum], regardless of their documents, it's unthinkable, I was really surprised by this and I think it's great. I probably wouldn't care if they didn't allow me to vote, but it's really inclusive that they let me vote, if the Polish community couldn't vote they wouldn't care about the whole debate

Szymon, 32, an HR adviser, Edinburgh

According to Szymon, there is a relationship between the extent to which Polish migrants will 'care' about the referendum and their enfranchisement in the Scottish referendum. Thus, inclusion in civic processes for Szymon and also Dawid and Marta had increased their familiarity with Scotland and their sense of recognition and value as part of the people of Scotland. This has also given them justification and permission to express their stake in the future of Scotland.

Polish migrants' membership entitlements in different political communities

While the participants were able to articulate their rationales with regard to why they should have a say (or not) in the independence referendum, there was lack of agreement as to whether the right to vote in their country of residence should preclude them from voting in their home country. Polish residents in Scotland have relevant stakes in more than one polity. As Polish citizens, Polish residents in Scotland hold expatriate voting rights in Poland and as EU citizens, they have a sub-national (local and European Parliament election and referenda) voting rights in other EU states where they take up residence. For example, Franciszek in the exchange below indicates that as a Polish citizen he still has a duty to take part in the national elections in Poland.

From what I remember I have taken part in all elections since I was entitled to vote. I'm talking about presidential elections in Poland, and parliamentary and local government ones too.

Researcher: But this rule of having to live in a place in order to vote which you have just talked about, doesn't it apply to you voting in Polish elections?

Franciszek: But I am still a Polish citizen – this is a reason why I want to be able to decide on things that take place there...

Franciszek, 31, an architect, Glasgow

Franciszek was one of those participants who expressed multiple stakes and a desire in participating in multiple polities. For Franciszek, eligibility to vote in Scotland should not preclude Polish residents in Scotland from casting their votes in national elections in Poland. Owen (2009) argues that citizens living abroad are still subject to the authorities of their home country (and thus have a stake), even if most of their rights and duties will remain inactive until they re-take residence in the state's territory. Polish residents in Scotland could therefore be described as 'political transnationalists' (Bauböck 2003, 700) who enjoy overlapping membership that creates different claims in the country of origin and country of residence. This political transnationalism was not however articulated by all participants;

for example, Monika indicated that as a permanent resident of Scotland she has little stake in Poland and therefore should not take part in political elections in Poland:

Researcher: Did you vote in Polish national election?

Monika: No, I didn't, because I don't think I should do if I don't live there (...) I think it's not my business and that I shouldn't interfere.

Monika, 30, a civil servant, Glasgow

The result of our online survey indicated that many Poles who have settled in Scotland shared Monika's view (Piątka-Nykaza and McGhee 2014). That is, our survey indicated that despite Poles having the right to participate and vote in both sub-national elections in the UK and national elections in Poland, most of our participants, vote in one or the other, not both.

The diversity of transnational voting patterns amongst our participants was justified through their equally intended diverse forms of citizenship attachments. For example, Anna described her participation in Polish elections as a 'duty', associated with protecting the interest of her remaining family in Poland. However, her enfranchisement in the Scottish independence referendum was perceived as a privilege:

Because I see it as my privilege. I perceive any elections in Poland as my duty but here I haven't got British citizenship yet... I will apply for it at some point but not just yet (...) Yes, my duty in Poland as it is my homeland where I was brought up; my parents and grandparents live there; I have a duty to prevent something that's bad in my opinion from happening or support something I believe is good. Here I see it as my privilege and not my duty or legal obligation because I've been here for six years. Initially I was a guest here and was welcomed with open arms. So I don't think it's that obvious that Polish people can vote here and decide on the future of the country. What's quite strange is that this privilege is granted to us because of the fact that we're EU members.

Anna, 42, a teacher of German language, Glasgow

By explaining the difference between the privilege and the duty to vote Anna gave examples of different forms of attachment towards her country of origin and her country of residence. These insights illustrate the different dimensions (privilege versus duty) of what membership in different political communities can mean for migrants. Anna also indicated that her enfranchisement in the independence referendum was given voluntarily through the EU citizenship rights. Despite most participants not considering voting rights as being an integral part of citizenship, they also recognised different dimensions of citizenship and the rights of residents:

If someone comes to visit he stops being a guest after some time. It becomes problematic and annoying when these guests don't take part in housework, for instance washing up sometimes, cooking etc. It annoys me a little that some emigrants have this attitudes that we must be quiet, calm and we can't say anything. I think there are areas which we can speak about, but there needs to be a certain moderation, because I can't compete, because I'm here only 8 years, I don't feel to be true-born Scottish and I probably wouldn't call myself that, maybe if I had a passport, but it's more about what I feel inside, I don't think that I have no right to decide and vote, especially when it comes to things which are close to me, for instance local government elections, parliament elections

Marek, a psychotherapist, 44, Edinburgh

Marek's perception is that while traditionally citizenship laws of democratic states are based on the principle of *jus soli* (birth rights), these rights should not be considered as a sufficient

condition of the democratic process of decision-making and political participation. Here, Marek makes a reference to inclusion into two distinct units: national citizenship (*true born Scots*) and political community (*the local, EU and parliamentary electorate*). For Marek, the eligibility criteria for inclusion in the political community differ from that of the citizen. The former relates to participation in self-governing political communities, the latter relates to collective identities and common ties. Marek's reasoning corresponds with Delanty (1997) distinctive dimensions of citizenship. In that sense, residence rights refer to membership in a political community and are primarily defined by rights and participation in that political community. Following Delanty (1997), there is more to citizenship than just rights other dimensions including identity also define citizenship. By recognising the difference between citizen and resident rights, Marek is adamant that voting rights should not be limited to national citizens. In the context of the Scottish independence referendum, the distinction between residence and citizenship rights had however further implications for Polish residents in Scotland. Despite being eligible to take part in the referendum, they were not considered as putative citizens of Scotland and would not automatically become Scottish citizens when Scotland gained independence (the referendum vote had been Yes) (Scottish Government 2012). Indeed the issues concerning the status and terms of residence of Poles in Scotland in the event of a Yes vote for independence in Scotland was discussed by number of our participants, including Agata:

It's interesting that even though we weren't born in this country, we can still vote. I spoke to a good friend of mine yesterday. He's 65, British, and he said that the fact that foreigners are allowed to vote doesn't mean that they will be given Scottish passports afterwards. He thinks that this is not right and believes that it would only be OK if foreigners were allowed to vote and then be given Scottish citizenship, but – as it's not the case – what will my status here be if Scotland becomes an independent country?

Agata, 30, a social worker, Edinburgh

Agata's narrative highlights the lack of congruence between those who are eligible to take part in the Scottish independence referendum and those who are considered as potential citizen of Scotland. Our participants' narratives suggest that they consider themselves in disconcerting position. That is as, EU residents in Scotland, they are eligible to participate in the constitutive political act of potentially establishing a new state; but as non-UK citizens they would not be recognised as a putative citizen of that new state. Furthermore, they were at potential risk of loosing their rights to stay in the new state (as European citizens) as a knock on effect of the uncertainty of the future membership of Scotland in the EU. This lack of congruence between eligibility for participation in independence referendums and eligibility for citizenship in the potential new Independent State was also articulated by Ziegler (2014). This however should not be understood as simple a matter of our participants' articulating a desire to acquire citizenship, but instead the desire to have their status (in terms of rights and responsibility) clearly defined in the event Scotland becoming independent. This was also indicated by the authors (McGhee and Piętka-Nykaza 2014) that Poles' 'stakeholdership' in the future of Scotland did not seem to follow Bauböck's assumptions that limited (sub-national) voting rights could lead to naturalisation by application (Bauböck 2005, 686). Instead, the participants, such as Agata, articulated the desire to have their legal status, or what Shaw calls 'long-term alienage' (2007, 70–71) clearly defined and articulated in a potentially independent Scotland. In that sense, clarification of foreign

resident status (rights and responsibilities) was more salient than naturalisation for many of our participants.

Conclusion

This article has explored the narratives through which subjects, by justifying their right to a right they have already been granted (that is, the right to vote in the referendum), constitute themselves as citizens and as being a legitimate part of the referendum electorate. Our participants' justifications are interesting because they are not performing an act of citizenship through claiming a right they do not have, rather they are justifying their right to have a right they have (but did not necessarily expect to have). As a consequence of not expecting to have this right (this was after all an unprecedented referendum), their justifications for having this right to vote and their intentions to act (or not) on this right could be described as the acts of citizens engaged in creating rather than following predetermined scripts (Isin 2013, 41).

The findings suggest that the majority of our participants emphasised the principle of *jus domicili* in justifying their eligibility and the intention to act upon their right to vote in the independence referendum. However, the principle of *jus domicili* alone was felt to be an insufficient justification or acting on their eligibility to vote in the referendum. Our participant also insisted that the intention to settle in Scotland was key to legitimising their participation in the election. That is, for our participants, the residency requirements underpinning their eligibility to vote in the referendum were defined by two criteria: length of stay and intention to stay. Long-term and intended residence implied that our participants were subject to legal and political actions but also were affected in socio-economic terms for a significant period over the course of their life and this would be potentially extended to the lives of their progeny. Thus, their narratives illustrate the pertinence of Beckman's (2006) contributivist and Bauböck's (2009) biographical subjectivism and dependency criteria in their justifications for taking part in the referendum. These interpretations however extend our understandings of Beckman's and Bauböck's criteria to introduce a compelling generational and futurist aspects to the contributivist and biographical subjection criteria.

This article critically engages with Bauböck's stakeholder principle (2005, 2009) by illustrating migrants' understandings and perspectives of their stakeholder in the Scottish independence referendum. Whereas our participants articulate their stakeholder in the future of Scotland in making their subjective claim for participation (voting) in the independence referendum, they did not support Bauböck's (2005, 2009) assertion that voting rights should be integrated part of the citizenship rights. Instead, participants articulated the *jus domicili* principle in determining the voting rights to those who are factual residents and whose lives are 'tied up' with their future country of residence. This could imply from the perspective of these migrants that suffrage should not be the privilege of citizens and that political rights should be more generally available for permanent foreign residents.

This study also illustrates the complex forms of migrants' citizenship attachments. There was a lack of agreement amongst our participants as to whether the right to vote in their country of residence should preclude them from voting in their home country. That is, not all participants expressed political transnationalism (Bauböck 2003) with regard to taking part in both sub-national elections in the UK and national elections in Poland. Despite this our participants did not consider voting rights to be an integrated part of citizenship rights,

they also articulated the substantive differences between citizen and residence rights and the eligibility criteria for inclusion in the political community and as citizens. Our participants privileging of residence rights stems from their understanding that membership in a political community entails rights and some degree of participation in that community. Citizenship, however, for our participants includes additional dimensions such as identity and common ties and is therefore a multidimensional phenomena. This understanding of membership entitlements corresponds with Denalty's (1997) assertion that citizenship is more than rights and that it should be also defined by duties, participation and identity. Furthermore, the distinction between resident and citizen rights in the context of the Scottish independence referendum resulted in Polish migrants not being considered as putative citizen of the potentially future Scotland, despite their eligibility to take part in the referendum, which was to decide the future of both the UK and Scotland (Ziegler 2014). This however did not result in our participants considering applying for citizenship in the potentially independent Scotland. Instead of naturalisation, the clarification of foreign resident status (rights and responsibilities) in potential independent state was more salient for many of our participants.

By examining migrants' experiences and reflections on their multiple citizenship attachments, this article offers greater understanding of the transformation of traditional state-centric concepts of citizenship rights into broader overlapping circles of membership affiliations. What is clear from our study is that those participants who were indifferent in their decision or perceived not to have a stake in the future of Scotland, excluded themselves from taking part in the elections. Lack of a sufficient stake for acting on their referendum voting rights was, according to some of our participants, related to their lack of attachments to Scotland. Lack of developed forms of attachments, despite migrants' long-term residence, can be problematic and may indicate migrants' socio-economic exclusion in their country of residence. Equally, this might also be a symptom of different types of 'migrant integration'. That is, integration in economic or labour terms as opposed to also integrating in wider 'socio-economic' terms across social, civic and cultural dimensions. This however raises the questions as to how 'stakes' and 'stakeholderships' (and thus subjective claims to political rights) are articulated by long-term foreign residents. Further investigation is therefore needed to explore the relationship between migrant's integration (including socio-economic integration) and their political participation in their country of residence.

Finally, despite being a small-scale study, what our study shows is that a right to vote and take part in the referendum could have further implications for migrants' greater civic integration expressed in their increased familiarity with the political processes in their country of residence or sense of recognition and value in their country of residence. This could imply that rather than over inclusiveness, the inclusion of foreign-born residents in the political processes in their country of residence (through granting them political rights) could result in forging a greater sense of belonging to polity (Mason 2000) and thus enhancing their sense of attachment to their country of residence.

Notes

1. Email: D.P.McGhee@soton.ac.uk.
2. Usual residents are defined as anyone who had stayed or intended to stay in the UK for 12 months or more.

3. Post-accession migrants are the citizens of the eight countries that joined the EU in 2004 (Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia and Slovenia).
4. In January 2013, British Prime Minister David Cameron called for ‘in/out’ referendum on British membership of the European Union in 2017.

Disclosure statement

No potential conflict of interest was reported by the authors.

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