

## Beyond Appearances: Citizenship Tests in Canada and the UK

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**Abstract** Citizenship tests are increasingly used by national governments as part of their naturalization procedures. Several analysts suggest that citizenship tests are indicative of a converging trend toward civic integration, especially in Europe. The reform of the Canadian citizenship test in 2009–2010 represents an opportunity to examine the mobilization of tests in different national context. Are citizenship tests necessary the central tools of civic integration policies? In order to answer this question, this article first argues that it is crucial to understand citizenship tests as public policy instruments. Using the approach developed by Pierre Lascoumes and Patrick LeGalès, the article compares the emergence and characteristics of the citizenship tests implemented by Canada and the United Kingdom. Stemming from this analysis, this article demonstrates that the two citizenship tests are different instruments despite their similar appearances. The Canadian test remains, despite the reform, an instrument to promote naturalization and integration. In contrast, in addition to promoting civic integration, the British test is also an instrument of immigration control.

**Keywords** Citizenship tests · Canada · UK · Civic integration · Public policy instruments

In 2010, Canada reformed the test that citizenship candidates must pass to become naturalized. The country had been testing newcomers for naturalization for a long time prior to the introduction of a standardized written test in 1995 (Joshee 2004). This test was subsequently reformed between 2009 and 2010. The introduction of this

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amended test—and the publication of a new version of the official study guide—was framed by the then Conservative government as a way to properly present Canadian values and ways of life, as well as to protect the value of Canadian citizenship. In the last decade, most of the work discussing citizenship tests has focused on their implementation and reform as part of a shift toward national “civic integration” policies. Observed primarily in Western European states, civic integration policies correspond to mandatory measures focused on the acquisition of language and on the demonstration of individual alignment with a set of national—often presented as liberal—values (Joppke 2007a, 1–14; Triadafilopoulos 2011, 861–862; Wallace Goodman 2010, 754–758). In political discourses, civic integration policies are presented as a break from previous multicultural and integration policies by their emphasis on newcomers’ capacity to participate in mainstream society and by the verification of their commitment to the tenets of a country’s citizenship values (Wallace Goodman 2010, 754). In practice, civic integration policies depart from integration policies by their use of “[...] punitive sanction to compel compliance” and by their concentration on immigrants’ individual responsibility to integrate (Triadafilopoulos 2011, 875). Citizenship tests are presented as one of the emblematic instruments of such policies. Considered from this perspective, the recent reform to Canada’s citizenship test might indicate a break with the country’s longstanding approach to the integration and naturalization of immigrants.

The central argument of this article is that, to understand the significance of the reform—and more broadly the use of citizenship tests by states—it is useful to view citizenship tests as public policy instruments. By bringing the test at the center of the analysis, this standpoint helps demonstrate that what seems alike at first may prove to be, under close scrutiny, very different. This analytical turn confirms that citizenship tests can be the instruments of a multiplicity of policies beside civic integration, ranging from citizenship promotion to immigration control.

To demonstrate the contribution of this approach, I will compare the test introduced in 1995 in Canada (including its 2010 version) with the test implemented by the UK in 2005. The comparison has a threefold rationale. First, despite differences in the countries’ histories and traditions in citizenship and immigration management (e.g., Smith 1993), there is now sufficient convergence in their institutional structures dealing with immigration to allow for comparison (Reitz 1988). Both countries share enough similarities in the areas of naturalization and citizenship policy to make them comparable cases (e.g., Kymlicka 2003).<sup>1</sup> Second, the Canadian case sheds light on the use of citizenship tests by countries other than those of Western Europe. The literature has yet to account for the recent mobilization or reform of citizenship tests by traditional immigrant-receiving countries such as Canada, the USA (e.g., Kunnan 2009), and Australia (e.g., Fozdar and Spittles 2009). These new cases create a need

<sup>1</sup> As described by Will Kymlicka in 2003, prior to the reforms, the two countries shared several characteristics in matters of naturalization and citizenship. He stresses that “[i]n particular, the requirements for naturalization are modest; dual citizenship is allowed, public support is provided to enable immigrants to meet these requirements, and the status of non-citizens is relatively well protected” (Kymlicka 2003, 200). Moreover, in a more recent comparative analysis, Marc Morjé Howard argued that “[...] Britain remains one of the most liberal countries within the EU-15”, despite the inclusion of civic integration requirements (Morjé Howard 2009, 161). This also reinforces the rationale for drawing the comparison; indeed, of all European countries, the UK turns out to be the one that is most like Canada.

to consider the portability of the findings from the current literature on citizenship tests outside of Europe. With this broader goal in mind, this comparative analysis helps gauge the magnitude and significance of Canada's 2010 test reform.

Using the public policy instruments perspective developed by Pierre Lascoumes and Patrick Le Galès (2004, 2007), this article argues that as a policy instrument the Canadian citizenship test differs from its British counterpart. First, each emerged in response to national circumstances that differed in nature and magnitude. Second, the citizenship tests in each country diverge in terms of their position in the naturalization process, their administration and implementation, as well as their content and their level of difficulty. The Canadian test (including its most recent version) complements the country's citizenship regime. Testing is used only once the major barriers to permanent residence and then citizenship have been passed. Thus, its net effect on naturalization is minor and its central role appears to be one of citizenship promotion. The British test, on the other hand, arrives much earlier in the process. Indeed, it acts as an additional and significant barrier to permanent residency even before acquisition of citizenship. Moreover, as a policy instrument, it establishes a highly visible approach to the content of citizenship and life in British society. These observable differences confirm that, despite the recent changes made to its test, Canada is not moving toward a policy of civic integration. The contrast between the Canadian and UK cases suggests that the British exam can be understood both as a civic integration measure, as well as a tool for immigration control.

The present article will first review the contemporary literature on citizenship tests, especially discussions of the convergence toward civic integration. It will then present Lascoumes and Le Galès' approach to public policy instruments. Lastly, it will analyze the Canadian and British tests in terms of their emergence, characteristics, and effects.

### Citizenship Tests: Sign of Convergence?

A major part of the literature on citizenship tests focuses on normative critics of the test (e.g., Fozdar and Spittles 2009; Cooke 2009; Ahmed 2008; Kunnan 2009; Wonjung Park 2008; Etzioni 2007; Olser 2009; Blackledge 2009; Bauböck and Joppke 2010). In addition, the fields of education (e.g., Joshee and Derwing 2005; White 2008), as well as language training (e.g., Mcnamara and Shohamy 2008; Derwing and Thomson 2005) have made several enlightening contributions on the topic. For the purposes of this article, the convergence thesis—in its various versions—is of particular interest. Several authors have identified the increased use of citizenship tests as a sign of convergence of national policies of different states, though they do not always account for the various characteristics and effects of tests.

The most cited convergence thesis stems from the work of Christian Joppke (2008, 2007a, 2007b, 2007c, 2004). Based on what he describes as the retreat of multiculturalism (Joppke 2004), Joppke suggests—in a comparative analysis of The Netherlands, France, and Germany—that the increased use of citizenship tests indicate a convergence towards civic integration policies (Joppke 2007a). He opens his analysis by stating that “[...] a key feature of the policy solutions that have been offered in response to the integration crisis is the weakening of national distinctiveness, and a

convergence with respect to the general direction and content of integration policy” (Joppke 2007a, 1–2) and that “[...] obligatory civic integration courses and tests for newcomers [...]” (Joppke 2007a, 2) represent an excellent example of those converging policies. Joppke defines civic integration policies by their compulsory character, the focus on knowledge of the country’s official language, history, and political institution (Joppke 2007a, 4–5) and their focus on duties rather than rights (Joppke 2007a, 14). The use of tests in Germany and in The Netherlands—and the French *contrat d’intégration*—are thus signs of the increasingly restrictive integration policies of these states (Joppke 2007a, 14–19).

Joppke also presents citizenship tests as a sign of a restrictively oriented modernization of citizenship laws and policies in Europe (Joppke 2008). Through an empirical analysis of the evolution of laws and policies in 15 European countries, the author shows transformations of the meaning of integration in government policies. Citing the work of analysts of citizenship law, he highlights that “[...] across Europe [v]ague concepts of integration and assimilation ... have...been replaced by standardized language and integration tests” (de Hart and van Oers 2006, 352; Joppke 2008, 22). As a consequence, integration is no longer presumed—even for long-term residents—and citizenship is increasingly becoming “[...] the end-point of, or reward for, integration” (Joppke 2008, 12). Four trends are described as illustrating changing European policies: (1) the reform of citizenship law, especially regarding principles of *jus soli*; (2) limitation of family reunification; (3) “[...] the attempt by states to tie citizenship more firmly to shared identities, civic competences, and public order concerns, as an antidote to the centrifugal tendencies of increasingly diverse and seemingly disintegrating immigrant societies” (Joppke 2008, 6); and (4) efforts to recruit migrants in diaspora communities (Joppke 2008, 6–31). Citizenship tests appear here as one of the preferred instruments of the increasingly restrictive European policies (Joppke 2008, 11).

The idea that the test is a sign of the homogenization of national policies is an interpretation shared by several analysts (Orgad 2010; Kostakopoulou 2010a; Extra et al. 2009; Hogan-Brun et al. 2009). For Silvia Adamo, citizenship tests are now conventional elements of contemporary naturalization policies in which citizenship must be earned, even after a long period of residency (Adamo 2008, 10). According to Maarten O. Vink and Gerard-Renée de Groot, citizenship tests in Western Europe are part of a general trend toward the increasing complexity of the processes resulting in naturalization (2010, 725–727).

Of course, not everyone subscribes to the convergence thesis. Some question the interpretation of the expansion of the use of tests as a sign of convergence. While acknowledging their increased use, these authors state that, to explain and interpret the presence of a citizenship test, one must first understand their characteristics and the context in which they are introduced (Peucker 2008; Jacobs and Rea 2007; Michalowski 2009). More recently, Sara Wallace Goodman systematically compared civic integration policies, including tests, and demonstrated that policy convergence in Western Europe “[...] is variegated, limited to some countries and not others” (2010, 769).

This literature review demonstrates a growing societal and academic interest in citizenship tests. However, informational gaps limit our understanding of this mechanism. While there are a growing number of studies on the topic, because of their

treatment of tests as signs of civic integration policies, they are often discussed in passing while the core of the debate revolves around the nature and the justifications of civic integration policies in a liberal context or the convergence of policy orientations. As a consequence, only a small number of analyses provide information on the evolution and consequences of the tests (Michalowski 2009, 3; Wallace Goodman 2010, 769).<sup>2</sup> Moreover, this creates analyses that do not pay serious attention to the implementation and administration of citizenship tests by governments.

### Citizenship Tests as Public Policy Instruments

In order to provide insight on the reasons states mobilize citizenship tests and to understand the consequences of such choices, this article considers citizenship tests as public policy instruments. In the study of public policy, one usually refers to instruments as the “[...] techniques at the disposal of governments to implement their public policy objectives” (Howlett 1991, 2). As stated previously, analysts point out that these tests are the preferred instruments of civic integration policies. The instrumentation perspective offers a framework where tests are the main empirical object of analysis. Instead of discussing and comparing civic integration policies and to identify the tests as an example of such policy direction, this article uses citizenship tests as sources of information about national policies. In addition, the public instrumentation perspective structures the comparison by highlighting the central analytical dimensions.

The political sociology perspective is preferred over other work on policy instruments, which stem namely from public administration and policy design literatures, because of the nature of citizenship tests. Mainstream approaches to policy instruments—often consisting of texts with an inductive style or approach—offers primarily middle range theories (Howlett 1991, 17) that remain hard to test in empirical settings (Hood 2007). This literature has produced numerous classifications of policy instruments,<sup>3</sup> highlighting the importance of policy consequences (Howlett 1991), activity types (Hood 1986), resources (Landry and Varone 2005), and levels of precision and uniformity (Linder and Peters 1991).

Citizenship tests do not fit easily into the major classifications of policy instruments developed by these literatures. Moreover, their use by states raises empirical questions that go beyond the dynamics of policy design. Citizenship tests resist functionalist interpretations since they neither objectively measure citizenship nor create it. They can be used for various purposes, in addition to their testing claims. They also have potentially direct and tangible effects on naturalization processes and influence the symbolic dimension of citizenship. Consequently, the study of citizenship tests is not well served by this body of literature on policy instruments, which focus primarily on classical conceptions of such instruments, especially those based on functions or resources.

A better understanding of these devices can be gained through a conception of policy instruments rooted in political sociology, as discussed in the work of Lascoumes and Le

<sup>2</sup> For an exception, see the analysis conducted by Van Oers (2010).

<sup>3</sup> Howlett (2011) presents an exhaustive and up-to-date overview.

Galès (2004; 2007). For these authors, instrumentation, that is, analysis of public action focussing on public policy instruments, is useful in demonstrating the tensions and logics inherent in the operationalization of government policy (Lascombes and Le Galès 2004, 12). Public policy instrumentation thus refers to “[...] the set of problems posed by the choice and use of instruments [...] that allow government policy to be made material and operational” (Lascombes and Le Galès 2007, 4). Here, a public policy instrument is understood as “[...] a device that is both technical and social, that organizes specific social relations between the state and those it is addressed to, according to the representations and meaning it carries. It is a partial type of institution, a technical device with the generic purpose of carrying a concrete concept of the politics/society relationship and sustained by a concept of regulation” (Lascombes and Le Galès 2007, 4).

This article argues that there are two central reasons why this approach to public policy instruments is the most fertile in examining citizenship tests. First, its conceptualization of instrument selection highlights and explains the particular nature of citizenship tests as instruments with purposes and effects that go beyond the supposed measuring of citizenship. Second, its insight into the symbolic and performative character of public policy instruments facilitates a dual interpretation of citizenship tests as devices that are simultaneously policy implementation mechanisms and means of presenting information about citizenship, naturalization, and integration.

Influenced by the sociology of public action and the sociology of knowledge, this conception of policy instruments goes beyond a functionalist account of instrument selection. From this perspective, instrument selection is rarely a rational decision based solely on efficiency, needs, or resources (Kassim and Le Galès 2010, 5). It is a technical as well as a political decision rooted in social and symbolic considerations. Moreover, this choice is constrained by the limited range of instruments available (Lascombes and Le Galès 2004, 359). As institutions, instruments are not only means of managing a specific problem; they also structure public action and future instrument selection (Lascombes and Le Galès 2004, 29).

In addition, Lascombes and Le Galès suggest that instruments are value-laden; they are not neutral technical devices of policy delivery (Lascombes and Le Galès 2004, 13). They incarnate knowledge about control and social relations (Lascombes and Simard 2011, 18–19). As such, they act as “particular policy frames and represent the issue in a particular way” (Kassim and Le Galès 2010, 5). This implies that the selection of policy instruments represents “[...] a means of orienting relations between political society (via the administrative executive) and civil society (via the administrative subjects), through intermediaries in the form of devices that mix technical components (measuring, calculating, the rule of law, procedure) and social components (representation, symbol)” (Lascombes and Le Galès 2007, 7).

Following Lascombes and Le Galès assertion that policy instruments are not neutral devices that emerge from functionalist logic, it is crucial to reflect on their selection and to analyze their validation in different contexts (Lascombes and Le Galès 2004, 358). Consequently, I will first analyze the contexts in which the tests emerged in Canada and the UK to reveal more about the framing of the issue and help situate the new instruments so as to contrast them with previous policies.

Second, I consider the characteristics of the two tests to gain insight into their indirect and direct effects. Following Lascombes and LeGalès’ suggestion that policy

instruments be understood as a theorization of the relationship between government and citizens (Lascombes and Le Galès 2004, 29), their careful analysis might reveal crucial information about representations of the process of integration, naturalization, and citizenship. In addition, the possible dissonance between the intended and actual effects of an instrument has implications for the study of citizenship tests. It requires that attention be paid to the empirical effects of the instruments.

Thus, in addition to a comparative assessment of the contexts in which citizenship tests in Canada and in the UK have emerged, I also compare four additional aspects of the two tests: (1) the position of the tests in the naturalization process; (2) their administration and implementation by governments; (3) the content of the tests; and (4) their level of difficulty and the consequences of failure for candidates.

### The Emergence of Citizenship Tests

*Canada* The standardized Canadian citizenship test was introduced in 1995, while the study guide was only periodically revised until 2010 (Chapnick 2011). The practice of testing immigrants for citizenship in Canada has a long history, though the systematization and centralization of citizenship education is a contemporary phenomenon (Joshee 2004, 128–129). Canada's contemporary citizenship regime has its origins in the creation of Canadian citizenship in 1947 (Jenson and Phillips 1996) and the introduction of a point system for migrant selection in 1967 (Galloway 2005), which is often presented as the first step towards the liberalization of the country's immigration policy. Notwithstanding certain modifications introduced periodically, Canada's contemporary orientation in the areas of immigration and citizenship has proved remarkably stable.

The Liberal government's decision in 1994 to create a standardized citizenship test and its implementation the following year did not represent a significant break from the previous naturalization procedure. The test replaced oral interviews with appointed citizenship judges. The standardization of the procedure did not mean the abolition of the function of citizenship judges; the judges are still responsible for final approval of citizenship, in certain circumstances, still interview candidates and assist in swearing-in ceremonies (Canada 2008).

The introduction of a standardized test in 1995 can be explained by two factors. First, in a period of budgetary austerity for the Canadian federal government (Courchene 2002), the test appeared as a low-cost alternative to costly individual interviews with judges. Second, the standardized citizenship test seemed to solve an important backlog in the handling of citizenship applications (Richet 2007, 34; Canada 1995, 29–30).

While successive governments made superficial revisions to the guide employed to study for the test, between the fall of 2009 and the spring of 2010, the Conservative government introduced the first major and publicized changes to the Canadian test itself. The changes reflected a general desire to reform certain elements of the country's immigration management—changes to citizenship by descent, residency requirements, regulation of immigration consultants, and proposed changes to the refugee system—and were a reaffirmation by the government of the importance of

ensuring immigrants' integration into Canadian society (Marwah and Triadafilopoulos 2009, 1; see also: Canada 2010c). Thus, Jason Kenney, then Minister for Citizenship, Immigration, and Multiculturalism, presented the changes to the test as a means to "[...]increas[e] the value of Canadian citizenship" (Kenney 2009). The new study guide, published in November 2009, stressed the social, political, and military history of the country and respect for the rule of law. The test was modified accordingly in March 2010 and now covers "[...] a wider range of material" (Canada 2010b). The reform was generally well received by the Canadian public (Ward 2009) even though some criticized it for its conservative orientation, omission of certain historical facts, and failure to mention lesbian and gay rights in Canada (e.g., Ivison 2009).

The emergence of a standardized citizenship test in Canada responded to technical problems, such as high costs and the backlog in application processing. The 2010 reform was a political decision by the Conservative government, but one that did not become overly politicized. While framed in a new discourse analogous to that of civic integration, the new guide and test kept the same general objective as the original procedure: to test general knowledge of Canada and to assess linguistic competency.

*United Kingdom* The current British citizenship test was introduced in 2005 to improve on certain routine naturalization procedures (Joppke 2008, 19–20). A test was added following implementation of the *Nationality, Immigration and Asylum Act* of 2002<sup>4</sup> and the recommendations of an advisory group report (United Kingdom 2002, 2003). The test's content was subsequently modified, and in 2007, the test became a requirement for indefinite leave to remain (i.e., for permanent residency) (Blackledge 2009, 12–13).

The emergence of a citizenship test in the UK can be linked to the growing importance of citizenship on the political agenda following the election in 2002 of Tony Blair. From the start, New Labour favored replacing the consumerist conception of citizenship that had prevailed since the Thatcher era with a communitarian ideal of citizenship (Greenwood and Robins 2002, 507–510). This conception of citizenship "[...] stress[es] community and responsibility and seek[s] to redress the balance between rights and community. Rights are seen as dependent upon community membership and accompanied by duties." (Greenwood and Robins 2002, 509–511). For some, this changing conception also placed social cohesion at the center of public discourse on citizenship emphasizing local communities, (Worley 2005, 489–490; Kiwan 2008, 64–72). This "thickening" of citizenship (Kostakopoulou 2010b) was not, however, antithetical to the overall history of British citizenship, where participation and duties have long been emphasized (Favell 1998, 113 and 124–126) and debated (Hampshire 2005, 180–185).

The introduction of the test was also a response to specific events. Following urban riots in areas with a high immigrant population (Jan-Khan 2003), the *Cantle Report* (2001) and the *Denham Report* (2002) recommended measures to ensure integration through active citizenship and language acquisition (Worley 2005). Finally, the

<sup>4</sup> The law modified the 1981 *British Nationality Act*, which can be understood as the pillar of Britain's contemporary citizenship regime (Hampshire 2005, 42; see also Hansen 2000, 222–464).



terrorist attacks of 2005 kept immigration, integration, belonging, and citizenship issues on the public agenda (Somerville and Cooper 2010, 130–132). In fact, as noted by Marc Morjé Howard, restricting immigration and managing integration now seemed to be a common concern for all political actors in the country: “[...] in the post-9/11 and especially “7/7” era, all parties now share a common fear of domestic terrorism committed by immigrants (or citizens) who are not integrated in or loyal to the United Kingdom, thus creating political competition to advocate for increasingly restrictive measures” (Morjé Howard 2009, 161).

The emergence of the test in the UK must be understood as part of a broader immigration reform encompassing greater border control, an improvement in the status accorded to qualified immigrants, the creation of new naturalization trajectories, and the concept, recently introduced, of “earned citizenship” (Kostakopoulou 2010b, 834–835). The use of a citizenship test in the UK signals a new version of the British philosophy of integration “[...] requiring migrants to demonstrate good behaviour and a willingness to integrate” (Kostakopoulou 2010b, 833; Asari et al. 2008). Its novelty, given the British context, might account for the malleability of the instrument, which has been modified twice since its introduction, and its continuous politicization.<sup>5</sup>

## Characteristics of Citizenship Tests

### Position in the Naturalization Process

In Canada, the citizenship test is one of the last steps in the naturalization process. Candidates for citizenship are asked to take the test following an assessment of their application by Citizenship and Immigration Canada (CIC). This implies that most of the test-takers are permanent residents and, theoretically, have lived in Canada for at least 3 years (Canada 2010a). Access to the test is limited to candidates who, according to CIC, “meet the basic requirements for citizenship” (Canada 2009a). Thus, the test seems to be an instrument mobilized at the end of the naturalization process and access to it is highly controlled by the public administration in charge. In light of its place in the process, it can hardly be construed as a means of selection or a major decision-making tool to deal with citizenship applications. Rather, given the structure of the Canadian naturalization process, the role of the citizenship test is primarily symbolic.

With regard to the test’s place in the UK naturalization process, two elements merit attention. First, the test is now a requirement for both naturalization and permanent residency (Ryan 2009). This makes it an instrument with a wider range of applications, and a device to which a variety of groups can relate. The test’s content and the level of difficulty are similar for both categories of applicants (naturalization and permanent residency applicants). Second, candidates must take the test before they

<sup>5</sup> As demonstrated by the debate surrounding the publication of *The Path to Citizenship* (United Kingdom 2008b), a report by the UK Border Agency, the test is still a prominent instrument for reform. During the preparation of the report, the idea of making the citizenship test a precondition for immigration was seriously discussed though ultimately rejected (Ahmed 2008).

submit their application and provide proof that they have passed it (United Kingdom, UK Border Agency 2010). A passing grade in the test is one of the preconditions for assessment of an application by the UK Border Agency. The test serves here as an active instrument at the start of the naturalization process. The decision to take the test is made by the applicant; access to test is not controlled by the administrative body in charge (Danzelman 2009, 4). Because of its position in the naturalization process, the test results in even more control over access to basic rights derived from permanent legal residence and full citizenship.

With regard to its place in the naturalization process, the Canadian test represents one of the last steps in the citizenship acquisition process, while the UK test serves as a gate-keeper for naturalization and permanent residency acquisition. This difference suggests that the two cases diverge in terms of the importance attributed to a candidate's knowledge of life in the country as a condition for naturalization. In Canada, this knowledge is largely assumed, using length of residency as a proxy; in the UK, for newcomers to be deemed ready for legalisation and naturalization, this knowledge must be demonstrated.

### Administration and Implementation

In Canada, Citizenship and Immigration Canada has the responsibility for the citizenship test. This federal department is the only body with an active role in its implementation. A study guide, *Discover Canada: The Rights and Responsibilities of Citizenship* (Canada 2009c), is available online and distributed to all test candidates free of charge. While there are direct and indirect costs associated with applying for citizenship, the citizenship test itself—held in government-sponsored testing centers across the country—is free of charge. This relative accessibility must be counterbalanced by the absolute control CIC exerts over access to the test. The department decides when to contact candidates to take the test (the criteria for this decision are not made public). As such, access to the test, more than the test itself, could be used as a tool to potentially and discretely impede or slow access to citizenship. In addition, and notwithstanding successful completion of the test, the final decision to grant citizenship remains in the hands of citizenship judges (Canada 2009b, 33). The citizenship test, taken at the end of the naturalization process, is an adaptable instrument theoretically allowing public servants to control access to citizenship.

In the UK, citizenship testing is the responsibility of the UK Border Agency. The administration of the test is devolved to private testing centers, which are often already involved in citizenship education. This multiplies access points for candidates to take the test; last totalled at 75 test centers across the country (United Kingdom 2009). Applicants pay between £5.99 and £9.99 for study materials, and £34 to take the test (in addition to the cost of the application). Moreover, applicants whose level of English is not adequate for taking the test<sup>6</sup> must undertake—and pay for—language and citizenship classes. The fact that the test must be taken using a computer

<sup>6</sup> Less than ESOL Entry level 3.

can represent a challenge for some applicants. While these factors constitute barriers, any applicant is free to take the test. Thus, the UK Border Agency does not control access to the citizenship test. In the UK, the test acts less as a discretionary instrument than as a device increasing the difficulty of access to naturalization and permanent residence.

The contrasts in administration and implementation of the tests reveal differences in the conception of the division of responsibility in regard to naturalization. The central role of Canada's federal public administration in implementing the test reflects the longstanding activism of the central government in promoting citizenship and Canadian identity (Bloemraad 2006, 110–118). By contrast, the decentralized administration of the British test indicates the significance attributed to individual responsibility in the naturalization process and the country's more explicit official recognition of private and community actors in the development of citizenship. As such, the UK test is more in line with the objective of civic integration described by Christian Joppke, namely, creating autonomous citizens who will participate in the community and the market (Joppke 2007c, 267–272).

### Tests Content

The Canadian citizenship test is a pencil-and-paper exam composed of 20 multiple-choice questions. The study guide focuses on themes such as democracy, citizens' rights and duties, and Canadian history, geography, economy, and political institutions. According to *Discover Canada*, the test includes questions on "[t]he rights and responsibilities of a Canadian citizen [...]; Canada's government and social, cultural, and political history; and, Canada's geography" (Canada 2009c, 52).<sup>7</sup> The test also tries to assess applicants' knowledge of one of the official languages. This assessment is usually noted in the file subsequently sent to the citizenship judge (Canada 2009b, 30).<sup>8</sup> The relative simplicity of the test and the broad scope of the study guide lead one to conclude that with proper preparation most candidates will be successful. Thus, the test has a rather minimalist conception of citizenship, and its content does not seem to be an obstacle to naturalization.

The British test is a computer-based exam with 24 questions. The topics covered are broad, and the test is concerned with practical aspects of daily life in the UK. Hence, the study guide is evocatively entitled: *Life in the United Kingdom: A Journey to Citizenship* (United Kingdom 2007). The test deals with topics such as immigration, women's rights, family life, population, the country's regions, religion and tolerance, traditions and customs, democracy and political institutions, housing, public services, banking and currency, health services, education, leisure, employment, and transportation (United Kingdom 2009). Linguistic ability being one of the precondition for taking the test, it is not a central dimension of testing. The instrument embodies an extensive conception of citizenship, mostly concerned with daily life.

<sup>7</sup> Examples of the questions used to prepare the Canadian and British tests are presented in [Appendix A](#).

<sup>8</sup> In discussing the reform, the Minister responsible, John Kenney, stated that this requirement would henceforth be strictly enforced (e.g., Kilpatrick 2009).

Consequently, to a certain extent, the test may be viewed as an integration test. The language precondition for taking the test, the wide range of subjects covered, and the content of the questions suggests that substantive experience of life in the country is the key to passing the test. The content of the British test, which favors candidates who already have a practical knowledge of the UK and of the English language, indicates that it is a potent instrument for selecting candidates for permanent residency and citizenship.

When Canada's citizenship test is compared with the test future UK citizens must take, symbolic and practical differences are evident. Canada's relatively simple test and questions of a more symbolic nature contrast with the specificity of experience-based questions of the UK tests. These differences points not only to divergence in the conception of citizenships but also in to contrasts in the significance they attribute to naturalization. Despite the recent reform in the Canadian test, the country continues to see naturalization as a step in the integration process (Kymlicka 2003, 199) whereas the British test is more aligned with the idea of citizenship as the "[...] reward for [...] integration" (Joppke 2008, 12) central to civic integration. These differences are buttressed by the previously discussed differences in the position of each test in the naturalization procedures.

#### Level of Difficulty and Consequences of Failure

Until 2010, the passing score for the Canadian test was 12 out of 20 (60%) while certain questions about the right to vote had absolutely to be answered correctly (Canada 2007, 6). In the case of failure, candidates had to meet with the citizenship judge, who might nonetheless grant them citizenship. This indicates that, for applicants who ended up taking it, the test did not represent a major obstacle to naturalization. On average, about 95% of candidates successfully completed the previous version of the test.<sup>9</sup>

The 2010 reform raised the passing grade to 75% and tightened controls for linguistic competency. Failures rose to a record rate of approximately 30% in the first months following the introduction of the new test (Beeby 2010). Changes were introduced to deal with this issue, including a temporary opportunity to rewrite the test in case of failure and the abolition of mandatory questions on voting (Beeby 2010). While it is too early to predict precisely how candidates will fare on the test, there are clear indications that failure rates will somewhat decrease. In fact, responding to the publication of data about the recent failure rates, CIC's representative stated that the Department "[...] anticipate[s] that the pass rate will settle in the 80-per-cent to 85-per-cent range, which would indicate that the test is not too easy or too difficult" (Beeby 2010). Thus, even post-reform, the Canadian test does not serve as an instrument designed explicitly to limit access to citizenship.

To pass the British test, candidates must correctly answer 18 out of the 24 questions (75%). Since passing the test is a required component of the application for naturalization and permanent residency, failed candidates may take the test again

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<sup>9</sup> Of the candidates who failed the test, about 80% were still awarded citizenship after an interview with a citizenship judge (Keung 2009).

but must pay a fee to do so. The nature of certain questions on employment, the economy, and practical aspects of life in society is such that it might be hard for certain candidates to pass the test by studying only the official guide. Since 2005, 68.5% of applicants for citizenship and 69.5% of applicants for permanent residency have passed the test.<sup>10</sup> These figures demonstrate that the British test is an instrument that can be used to control—or at least slow down—access to rights derived from citizenship and permanent residency. As such, it aligns with the punitive character of civic integration policies (Triadafilopoulos 2011, 861-863; 875)

While it is too early to predict the response of the Canadian government to the increased failure rates for the new version of the test, it seems reasonable to expect that these rates will not increase again in the near future. Consequently, it cannot be argued that the Canadian citizenship test is a policy instrument designed for the purposes of exclusion. In the UK, the high failure rates demonstrate that, in addition to supporting civic integration policy, the test has become yet another way of controlling immigration and permanent settlement (Wallace Goodman 2010, 767-768).

## Conclusion

The comparative analysis of Canadian and British citizenship tests as public policy instruments provides a fresh perspective on these devices. First, it demonstrates that the introduction and modification of citizenship tests are fundamentally dependent on national contexts and circumstances. Canada's introduction of a standardized test was primarily a technical decision. The Conservative government's recent reform, which was neither a response to a crisis nor accompanied by other changes in the naturalization regime, indicated a political change that failed to gather much attention. Since testing for citizenship in Canada was already a well-established practice, the 1995 and 2010 changes were akin to instrument adjustments, rather than paradigm changes (Hall 1993, 278-279) that would represent a shift toward civic integration. In the UK, by contrast, the introduction of a citizenship test was clearly part of a larger and ever expanding trend toward restrictive policies (Favell 1998; Morjé Howard 2009). It represented a new instrument conveying a new conception of citizenship and introduced a new practice in the process of naturalization in Britain. Moreover, the test responded to a crisis in the management of immigration and diversity in the UK. Similarly, the more highly politicized nature of the test points to a broader change in philosophy, one aligned with civic integration.

Second, the comparison of their characteristics demonstrates it would be misleading to present the two tests as equivalent instruments. In Canada, the citizenship test is mobilized as the end point of the naturalization process. Because the test arrives well after immigration selection and control, it is both an instrument for citizenship promotion, a symbolic rite of passage, as well as a potential way to control citizenship acquisition. As such, the instrument upholds Canada's historical preference for and

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<sup>10</sup> Numbers provided by the Home Office. The Home Office does not have information on the average number of times candidates take the test before succeeding (source: author's correspondence with the Home office, 04 May 2010).

promotion of naturalization of selected candidates (Bloemraad 2006, 110-114). In general, the Canadian test acts as a symbolic rite of passage projecting a minimalist version of liberal citizenship. In the UK, the test clearly constitutes a barrier at the beginning of the process of naturalization and permanent residency. Moreover, the instrument embodies a communitarian conception of citizenship. Beyond appearances, these two citizenship tests are actually different instruments. In light of this comparison, it would be misleading to read the 2010 reform of the test as indicative of a shift toward civic integration in Canada.

These contrasts demonstrate the interest of treating citizenship tests as public policy instruments. As a general standpoint, the policy instrumentation approach helps to concentrate the analytical attention on citizenship tests as a source of knowledge about broader policy objectives. In addition, Lascoumes and LeGalès' political sociology is especially suited for the study of instruments that are not mobilized solely for a functional purpose, such as citizenship tests. By emphasizing the symbolic and performative role of policy instruments in state–society relationships, the perspective helps assess the implications of the knowledge and the representations conveyed by tests. As this analysis has showed, these symbolic dimensions must be considered as they can reinforce the characteristics of the tests. Finally, by highlighting the political and contingent nature of instrument choice, Lascoumes and LeGalès' perspective makes it possible to account for the fact that citizenship tests emerge as a policy solution following different processes and in response to different issues. This is crucial, as the divergent nature of tests seem to be closely related to their contexts of emergence, as well as to the presence, orientation, and effectiveness of other instruments for controlling immigration and promoting citizenship.

The differences between the two tests have implications for the study of citizenship tests. The comparison confirms that a citizenship test cannot automatically be used as the indicator of civic integration policies. As public policy instruments, citizenship tests can be the tools of a diverse range of public policies, from citizenship promotion projects to civic integration schemes. The Canadian case aptly demonstrates that citizenship tests can be instruments with no connection to civic integration. Even in its contemporary version—based on Conservative government discourse that might evoke civic integration—the test projects a liberal conception of citizenship and serves as a tool for promoting, as well as theoretically controlling access to citizenship at the end of the naturalization process. As for Britain's test, it must be considered as the tool of a civic integration policy as well as a potent instrument for immigration control given its position at the beginning of the immigration process (Wallace Goodman 2010, 767-768).

More broadly, this analysis signals that caution must be exercised in interpreting the increased use of citizenship tests as an indicator of policy convergence. By showing that citizenship tests reflect the broader governance contexts in which they are embedded, the comparison aligns with the literature that presents test as a continuation of national models (e.g., Jacobs and Rea 2007; Peucker 2008). This reveals that, if one wishes to avoid confusing the dissemination of instruments and practices with the convergence of policies (Radaelli 2005), the various processes resulting in the increased use of tests in Europe and in traditional immigrant-receiving states still need to be explored.

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## Appendix A: Example of questions for the preparation of citizenship tests<sup>11</sup>

(The candidates are provided with multiple choice answers when taking the test)

Canada	UK
• "Name two key documents that contain our rights and freedoms"	• "True or false ? 'Adults who have been unemployed for 6 months are usually required to join New Deal if they wish to continue receiving benefit."
• "Identify four rights that Canadians enjoy"	• "What is a quango ?"
• "Name four fundamental freedoms that Canadians enjoy?"	• "Do women have equal rights in voting, education and work, and has this always been the case? "
• "What is the significance of the discovery of insulin by Sir Frederick Banting and Charles Best?"	• "When do children take tests at school? "
• "What is meant by the equality of women and men?"	• "What sports and sporting events are popular in the UK? "
• "What are some examples of taking responsibility for yourself and your family?"	• "What services are provided by local authorities? "
• "When you go to vote on election day, what do you do?"	• "Are newspapers free to publish opinions or do they have to remain impartial? "
• "Who is entitled to vote in Canadian federal elections?"	• "How and where is refuse (rubbish) collected? "
• "Who is your Member of Parliament?"	• "What is the film classification system? "
• "What is the capital of the province or territory that you live in?"	• "How can a person get a driving licence?"

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<sup>11</sup> From: Canada (2009c) and United Kingdom (2008a).

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