

Reconstructing Citizenship After Brexit: European Identity and Legal Membership Among British Nationals Living in France

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Abstract

This article examines how the United Kingdom's (UK) withdrawal from the European Union (EU) in 2016, commonly known as '*Brexit*', has affected the lives, citizenship status, and European identity of British nationals who continue to reside in EU Member States.

Focusing specifically on the experiences of British nationals living in France, this study used qualitative interviews conducted between 2023 and 2025 to explore whether the loss of European citizenship had altered their sense of belonging (to the UK, the EU, and their country of residence), and how they had coped with the legal and administrative consequences of Brexit.

The interviews revealed that some British nationals applied for French citizenship to ensure they could remain in France following the 2016 referendum, identifying themselves as '*British and European*'. Conversely, whilst some British nationals remained in France after obtaining a residence permit under the EU–UK Withdrawal Agreement, others were refused this permit and were not considered eligible to remain in France. This study focused specifically on the views of British nationals who had worked for European and international organisations regarding their identity and citizenship. The findings suggest that the particular circumstances of these international civil servants, who fall outside the scope of the Withdrawal Agreement, have created a situation of vulnerability. To address this situation, the study examined the current status of their efforts to reconstruct their citizenship in order to continue living in France. It revealed that tracing ancestral roots to an EU Member State and applying for naturalisation, regardless of place of residence or the presence of a national identity, is emerging as a strategy for regaining EU citizenship rights.

Keywords: Brexit, European Identity, European Citizenship, Migration

Introduction

Five years have passed since the United Kingdom (UK) withdrew from the European Union (EU), an event commonly known as Brexit. This article examines how Brexit has affected the lives, citizenship status, and European identity of British nationals who have continued to reside in EU Member States.

For the first time since the EU was founded, a Member State withdrew from the Union, and, as a result, its citizens lost their EU citizenship. As EU citizenship guarantees the right to move freely, reside, and participate in political life within the EU, the impact on everyday life has been significant. Consequently, the UK and the EU concluded the Withdrawal Agreement under Article 50 of the Treaty on European Union (TEU) and established a transition period lasting until 31 December 2020 to protect citizens' rights.

Following Brexit, more than 3 million EU nationals residing in the UK lost the rights of entry, residence, and employment previously granted to EU citizens. There has been considerable qualitative research on changes in their residence status and citizenship (Castellani, 2024), as well as on the residential insecurity resulting from these changes (Zontini & Genova, 2022). In particular, attention has focused on the changes brought about by Brexit for migrants from Central and Eastern Europe (CEE), who constitute a particularly large proportion of the UK migrant population (Siklodi, 2023; Moscal, 2025). In contrast, there has been very little research on British nationals who have migrated to continental Europe. Suzuki (2020) highlighted that approximately one million British nationals residing in EU Member States are at risk of losing their EU citizenship and revealed that some of them are choosing to naturalise because of concerns about their livelihoods in their countries of residence and dissatisfaction with losing their right to vote in local elections. Furthermore, Benson (2020) pointed out that Brexit has created new boundaries among British nationals residing in France regarding the acquisition of residence rights and that they are being judged on whether they are eligible to reside in Europe.

This article aims to update these findings five years after the end of the transition period. It presents a qualitative analysis based on interview data to clarify changes in the lives, citizenship, and identity of British residents in France.

This article is organised into four sections. First, it explains the background to the emergence of '*European identity*' and '*European citizenship*'. Second, it examines the implications of the loss of EU citizenship, using British residents in France as a case study, by analysing the Brexit process and its impact on EU citizens. It then outlines the interview survey conducted with British residents in France between July 2023 and March 2025 and presents the analytical framework. The findings focus specifically on the views on identity and citizenship held by British nationals who had worked for European or international organisations. Finally, the article identifies the forms of identity found among British residents in France and outlines the current state of their efforts to reconstruct their citizenship in order to continue living in France.

European identity and European citizenship

The concept of European identity emerged during the 1970s and 1980s as the European Community (EC) sought to strengthen political cohesion among its Member States (European Communities, 1976). In pursuing the idea of a '*Citizens' Europe*', the EC attempted to foster a European identity through the introduction of rights associated with European citizenship—including freedom of movement, residence, and political rights within the EC—as well as through the promotion of European symbols such as the flag, passport, and single currency. These principles were later codified in Article 8 of the Treaty on European Union (the Maastricht Treaty), signed in 1992.

European citizenship does not replace national citizenship granted by sovereign states. Rather, it allows individuals to maintain multiple forms of belonging and thus facilitates multiple identities (Heater, 1997). Similar to Habermas's concept of constitutional patriotism, European citizenship may be understood as a form of post-national citizenship founded upon shared legal and political principles. All nationals of EU Member States are EU citizens and enjoy equal rights, including freedom of movement and residence within the EU, as well as the right to vote and stand as candidates in municipal and European Parliament elections in their country of residence. Today, these rights are guaranteed under Article 21 of the Treaty on the Functioning of the European Union (TFEU) and Article 45 of the Charter of Fundamental Rights of the European Union.

Citizenship is generally understood to consist of three dimensions: rights and duties, participation, and identity (Lister & Pia, 2008). EU citizenship has often been criticised for emphasising rights without imposing corresponding obligations (Wihtol de Wenden, 1999). Furthermore, while acquiring the nationality of an EU Member State automatically confers EU citizenship, the EU itself has no authority to determine who qualifies as a citizen. This limitation became particularly visible in debates surrounding so-called '*golden passport*' programs, through which some Member States, such as Cyprus and Malta, granted nationality to third-country nationals. In response, the European Commission argued that EU citizenship requires a '*genuine link*' with the Union (European Commission, 2020).

Consequently, there is a tendency for people to acquire the citizenship of another country in order to gain easier access to it (Kim, 2019; Mateos & Durand, 2012). In particular, the recognition of dual nationality lowers the psychological barrier to obtaining a second passport. This constitutes '*compensatory citizenship*' (Harpaz, 2019); in countries such as Italy and Spain, where citizenship is granted to descendants of South American nationals based on *jus sanguinis*, a European passport allows free movement within the EU. However, because this external citizenship is granted without any residence requirement, it lacks a '*genuine link*' with the state. For this reason, external citizenship, citizenship by investment, and European citizenship have been described as forms of '*citizenship light*' (Joppke, 2018). Indeed, the question has been posed: '*citizenship on paper or at heart?*' (Yanasmayan, 2014).

Moreover, EU citizenship is defined solely by the nationality of a Member State. It does not require loyalty to Europe, linguistic competence, or self-identification as European. Consequently, European identity differs from national identity in that it lacks a fixed

and clearly defined foundation. In response to this situation, Joppke (2018) termed this phenomenon citizenship's '*liberal de-dutification*'. This raises an important question: to what extent does EU citizenship foster a sense of European identity among its citizens?

Brexit and its consequences

The UK joined the EC during a period when debates surrounding European identity were particularly prominent. However, Eurostat surveys consistently demonstrated that national attachment among British citizens remained stronger than attachment to Europe when compared with the average across the Member States. British Euroscepticism towards the transfer of sovereignty to European institutions became particularly visible under Margaret Thatcher's government in the 1980s, when she famously demanded, '*I want my money back*', in negotiations concerning the UK's contribution to the EC budget.

Similar rhetoric reappeared during the 2016 referendum on EU membership. Advocates of withdrawal promoted the slogan '*Take back control*' and ultimately succeeded in securing a majority vote in favour of leaving the EU. Brexit represented the first withdrawal of a Member State in the history of the European Union.

For the EU, Brexit constituted a profound crisis. One interpretation suggests that the process exposed political instability and democratic deficiencies within the UK (Berrod, 2020). Following the unexpected referendum result, in which approximately 51 per cent voted in favour of leaving the EU, Prime Minister David Cameron resigned. His successor, Theresa May, formally notified the EU of the UK's intention to withdraw under Article 50 of the Treaty on European Union (TEU) in March 2017.

However, the two-year withdrawal negotiation process failed to produce a final agreement within the prescribed timeframe, leading to significant conflict between the government and Parliament. Furthermore, the concerns of Scotland and Northern Ireland, where majorities of 56 per cent and 62 per cent, respectively, had voted to remain in the EU, were largely disregarded. In Gibraltar, which is directly connected to Spain, a striking 96 per cent of voters supported remaining in the EU (Sacramento & Castan Pinos, 2000, p. 196). Gibraltar became the only British Overseas Territory to be granted full British citizenship in 1981; a decisive factor was Gibraltar's status within the European Economic Community (EEC). Following Brexit, as the only British territory on the European continent, the people of Gibraltar once again found themselves in a unique position as supporters of Europe (Norton, 2024).

According to Berrod (2020), this series of events revealed the internal and external undemocratic consequences of the Brexit referendum. It thus laid bare the irony that, although Brexit was intended to '*take back control*', it instead resulted in political deadlock and a loss of control.

Another democratic problem concerned the voting rights of British citizens residing abroad. Under UK electoral law, British citizens who had lived outside the country for more than fifteen years lost their right to vote. As a consequence, many British citizens

residing in other EU Member States were not allowed to vote in the 2016 referendum, despite the fact that its outcome would directly affect their lives (Suzuki, 2020). Although many had lived and worked in EU Member States for decades, they were denied the opportunity to vote on whether the UK should remain in the EU.

The effect of Brexit on EU citizens' rights and British nationals living in EU countries

Brexit also created uncertainty regarding EU citizenship. The rights of EU citizens residing and working in the UK, as well as those of British nationals residing in other EU countries, became central issues during the withdrawal negotiations. Following the UK's formal departure from the EU on 31 January 2020, the EU–UK Withdrawal Agreement established a transition period lasting until the end of that year, during which EU law continued to apply in the UK. During this transition period, more than three million EU citizens residing in the UK and over one million British nationals residing in EU Member States were required to apply for residence permits in order to maintain their legal status in their country of residence. The Withdrawal Agreement was designed to preserve existing rights, yet the loss of EU citizenship meant that residence permits effectively became substitutes for the rights previously guaranteed by European citizenship.

From 1 January 2021 onwards, EU citizens wishing to enter or remain in the UK for longer than ninety days became subject to immigration controls applicable to third-country nationals. Conversely, British citizens lost their freedom of movement, residence and employment throughout the EU, as well as their voting rights in municipal and European Parliament elections in their country of residence.

The consequences of losing EU citizenship had never previously been experienced because no Member State had ever withdrawn from the Union. While EU nationals living in the UK also experienced changes to their rights as a result of Brexit, they retained EU citizenship through their national citizenship. British nationals therefore became the first population in the history of European integration to lose EU citizenship collectively.

Since Brexit, research has been conducted focusing on EU citizens residing in the UK, particularly those from CEE (Siklodi, 2023; Moscal, 2025), Italians and Bulgarians (Zantoni & Genova, 2022), and French nationals (Castellani, 2024), examining their anxieties regarding residency, perceptions of citizenship, and sense of belonging. In contrast, there has been little research addressing British citizens residing in EU Member States or their anxieties regarding residence rights and citizenship following Brexit. According to Auer and Tetlow (2023), statistics show that the number of British nationals migrating to EU countries has increased significantly since the referendum. This trend was observed among British nationals residing in Germany who naturalised by the end of 2020, aiming to reduce the adverse effects of Brexit on their lives, particularly uncertainty about the

future and a worsening economic outlook. In particular, the availability of dual nationality has provided British nationals with a strong incentive to obtain a second passport, with relatively little additional administrative burden (Auer & Tetlow, 2023).

British nationals living in France

This article investigates whether British nationals who have continued to reside in the EU have been able to maintain their previous way of life under the protections provided by the Withdrawal Agreement and whether their citizenship status and identities have changed. France was selected as the principal case study for three reasons.

Firstly, France has long been a major country of immigration, receiving migrants from the Maghreb, Spain, Italy, Portugal, and elsewhere throughout the twentieth century. Less widely recognised, however, is the significant increase in British migration to France since the early 2000s, particularly following the global financial crisis when migration flows from other regions declined (Suzuki, 2011, p. 46–47). British migrants differ substantially from other immigrant groups in France. Whereas many migrants arrive in urban areas seeking employment, a large proportion of British migrants are retirees, generally not economically active and living in the countryside. Previous ethnographic research has identified a broader phenomenon of International Retirement Migration (IRM), particularly towards Mediterranean regions (King, Warnes & Williams, 2000). Southern France, such as the Nouvelle-Aquitaine, has become one of the preferred destinations for British retirees seeking a better climate, lower living costs, and a higher quality of life than that available in the UK (Benson, 2010; King, Warnes & Williams, 2000).

Secondly, British nationals, known as Eurosceptics, have benefited from the positive effects of European integration and European citizenship. Developments in transport infrastructure, including Eurostar rail services (Favell, 2008) and low-cost airlines such as Ryanair, have facilitated increasingly affordable mobility between Britain and France. Combined with EU citizenship rights guaranteeing freedom of movement, residence, and employment, these developments enabled British nationals to engage easily in travel and cross-border mobility. Furthermore, British nationals living in France have demonstrated relatively high levels of political participation compared with other EU migrant groups. A notable number of British residents have served as municipal councilors in local French governments (Suzuki, 2015, p. 27). However, as a result of losing their EU citizenship due to Brexit, they have been excluded from political participation. This point had a strongly negative impact on their way of life.

Thirdly, France is host to a large number of international organisations. Many diplomats from the UK, a founding member of the Council of Europe (CoE) and a member of the EC since the 1970s, are also stationed there; they are engaged in specialist work directly related to European integration and have been resident in France for many years.

Thus, amongst British nationals residing in France, there are two distinct groups: ‘*newcomers*’—non-economic migrants who utilise their EU citizenship for tourism or settlement—and ‘*oldcomers*’—long-term residents engaged in specialised professional work, often directly linked to European integration. It is rare to find an EU Member State encompassing both of these categories with a large enough population. Although these British nationals living in France have relied on European integration and the rights of European citizens, maintaining their previous way of life has become more difficult following the UK’s withdrawal from the EU.

The meaning of losing EU citizenship for British nationals in France

How has Brexit transformed the citizenship status of British nationals residing in France? Prior to Brexit, British nationals enjoyed the same rights as French, Polish, and other EU citizens, including freedom of movement, residence, and employment. Following Brexit, however, British nationals ceased to be EU citizens and became third-country nationals, legally comparable to Japanese and other third-country nationals residing in the EU.

The EU–UK Withdrawal Agreement guarantees residence rights for British nationals who had already exercised their right to free movement before Brexit; however, it does not guarantee political rights. Since EU citizenship is reserved for nationals of EU Member States, British nationals who lost EU citizenship also lost the political rights associated with it.

Consequently, Members of the European Parliament elected from the UK ceased to hold office on 1 February 2020. Voting rights in local elections became dependent upon national legislation in each Member State. Some countries concluded bilateral arrangements with the UK allowing British nationals to continue participating in local elections. Others, including France, announced that British citizens would no longer enjoy the right to vote or stand as candidates in municipal elections following Brexit (EPRS, 2020, p. 15–17). As a result, 760 British local councillors living in France were unable to stand as candidates in the local council elections held in March 2020. For these British residents, who had been deeply involved in community activities, exclusion from the candidate lists was a major blow; for the local authorities, it also meant losing an important link with their British residents (Leduc, 2020).

Existing sociological research has explored changes in European belonging among British residents in France following Brexit. According to Suzuki (2020), British residents in Dordogne and Alsace expressed frustration during interviews that they had been excluded from the Brexit referendum because of the UK’s electoral rules and anxiety about whether they would have been able to vote to remain. As a result, many found themselves in a situation in which they had lost political rights in both their country of nationality and their country of residence. That study also revealed that political participation and attachment to local communities contributed to a stronger sense of citizenship, leading some respondents to consider acquiring French nationality in order to regain citizenship

rights. Benson (2020) also argues that the loss of European citizenship generated significant insecurity among British residents in the Lot region and points out that Brexit introduced new border procedures for British citizens residing within the EU. Because their legal status had previously been guaranteed through freedom of movement, they had rarely needed to apply for residence permits. As a result, British nationals increasingly found themselves evaluated according to whether they were considered ‘*deserving*’ or ‘*undeserving*’ of ‘*the privilege of staying put*’ (Benson, 2020, p. 508). Some British nationals sought to secure their future by applying for residence permits, permanent residence status, or French nationality. Others, however, encountered significant obstacles: retirees who failed to satisfy financial requirements or individuals lacking family support occasionally faced rejection of residence applications and, in some cases, were even issued orders to leave French territory (Benson, 2020).

Overview of the survey

Research purpose, questions and methodology

Therefore, Brexit has rendered life in France more insecure for many British nationals. In response, they have sought to reconstruct forms of citizenship through new legal status and alternative pathways to residence. However, the aforementioned studies were published in 2020 and therefore did not examine the longer-term consequences following the end of the transition period. This paper seeks to fill the five-year gap following Brexit by examining the impact that the loss of EU citizenship has had on the sense of belonging and identity of British nationals residing in France. It is based on the assumption that citizenship rights may contribute to the development of attachment to the political community that grants those rights. From this perspective, two principal research questions were formulated: Does the loss of EU citizenship also lead to the loss of European identity? (RQ1); How has Brexit affected British nationals’ sense of belonging and citizenship? (RQ2).

The author therefore conducted a follow-up study based on interviews with British nationals residing in France, carried out immediately after the referendum. Adopting a phenomenological qualitative research approach, the author sought to elucidate the changes in everyday life and sense of belonging brought about by Brexit. As this method aims to capture each individual’s unique experiences, the relatively small sample size is consistent with the aims of phenomenological qualitative research. Five respondents had previously participated in interviews conducted by the author in 2017, allowing for a longitudinal comparison of their experiences before and after Brexit.

To supplement these accounts, a further 10 participants were recruited using snowball sampling during a sabbatical in France, and semi-structured interviews were conducted with a total of 15 participants between August 2023 and March 2025, including fieldwork conducted in August 2023, June–December 2024, and January–March 2025. Eleven of the interviews were conducted face-to-face at their homes, offices or caf  s, whilst four were conducted online.

As the author is fluent in French, the interviews were often conducted in French; however, most of the interviewees spoke French extremely fluently. Some interviewees, who were not comfortable with French, were interviewed in English. This reflected the fact that those interviewees had lived in France for less than ten years. In this article, interview content was translated into English and kept anonymous.

Each interview took about an hour, and if there were any questions, these were asked later by email. The questions are as follows: the date and reason for coming to France; occupation; if retired, the date of retirement; educational background; family composition; frequency of return visits to the UK; whether they voted in the referendum and their reaction to the result; any inconveniences or changes in their daily life following Brexit; their views on European citizenship; and their sense of belonging.

Analytical framework

Based on the two research questions (RQ1, RQ2), this analysis focused on respondents' sense of belonging and identity following Brexit. It aimed to explore changes in their European identity and citizenship through the following questions:

'Do you still consider yourself European after Brexit?'

'Are you considering acquiring citizenship of an EU Member State after Brexit?'

From the responses to these questions, we first extracted those relating to 'citizenship', 'nationality' and 'sense of belonging/identity' and categorised the respondents' sense of identity as 'European', 'British' or 'French'. Next, we extracted descriptions of the changes they perceived in their citizenship or status due to Brexit.

Overview of the respondents

The respondents ranged in age from 34 to 84 years, with eight individuals aged over sixty. The sample consisted of nine men and six women.

Thirteen of the fifteen respondents were permanent residents of France. One respondent resided in France only for part of the year because of visa restrictions, while another resided only temporarily during visits. Thirteen respondents had worked or were working in France, one had worked in Switzerland, and one in Belgium. Nine respondents had worked or were working for European institutions. Seven respondents were retired.

The sample exhibits five notable characteristics. Firstly, approximately half of the respondents had family members who were citizens of EU Member States. Five had French family or partner, while three had relatives from other EU countries (A Czech, a Portuguese and a Pole). Five respondents were part of British–British couples, and two were not mentioned.

Secondly, 85 per cent of respondents (13 individuals) had worked or were working in France, while 60 per cent (nine individuals) had professional experience within European institutions. Among them were three individuals who had exercised European political rights directly, including one former member of the European Parliament and two former municipal councillors.

Thirdly, the respondents had generally resided in continental Europe for long periods. Their average length of residence exceeded thirty years, ranging from two to fifty-seven years. Approximately 60 per cent had been unable to vote in the 2016 referendum because of the UK's fifteen-year rule for overseas voters. Only one respondent had moved to continental Europe after Brexit.

Fourthly, although respondents were geographically dispersed across France, there was some regional concentration. Seven resided in the Grand Est region including Strasbourg, three in Nouvelle-Aquitaine, two in Île-de-France, one in Auvergne-Rhône-Alpes, one in Provence-Alpes-Côte d'Azur, and one in another European country.

Finally, the sample reflects a degree of social and cultural selectivity. Respondents generally possessed high levels of education, strong political awareness, substantial interest in European affairs, and relatively privileged socio-economic positions. The study therefore does not include individuals in particularly vulnerable social or economic circumstances. Also, issues of racial discrimination are not addressed in this analysis. All respondents identified as White British. Interestingly, two interviewees remarked that while they personally had not experienced discrimination because they were white, they considered some aspects of EU citizenship policies to be discriminatory in principle.

European identity after Brexit

Three principal findings emerged from the analysis. Firstly, responses concerning European identity were highly diverse. Some respondents described themselves as *'French and British'*, while others simply identified as *'European'*. Several characterised themselves as *'a convinced European'*, *'British-European'*, or *'European and British'*. These responses suggest that European identity is not necessarily exclusive. Rather than replacing national identity, it often coexists alongside it. Some respondents simultaneously expressed attachment to both Britain and Europe, while others referred to dual national identities that reflected their legal citizenship status. European identity may therefore be understood as both singular and plural.

Secondly, two broad patterns emerged regarding the characteristics of those expressing different forms of identity. British nationals who had acquired French nationality tended to emphasise their attachment to France. Their narratives frequently linked naturalisation with deeper integration into French society and political life. By contrast, respondents who had retained British nationality while obtaining residence rights in France—or those who had not yet acquired French nationality or permanent residence status—more often

described themselves as both British and European. In these cases, respondents did not perceive European identity as incompatible with British identity despite the UK's withdrawal from the EU.

Thirdly, although the expression of identity differs between these two patterns, both naturalisation and permanent residence status in France function as mechanisms through which British nationals seek to recover the rights previously associated with EU citizenship. This suggests that they were actively reconstructing new forms of citizenship following the loss of EU citizenship as a consequence of Brexit.

The findings therefore suggest that Brexit has not led to the disappearance of European identity among British nationals residing in France. Rather, European identity continues to coexist with national identity and is often reinforced through efforts to regain the legal rights associated with EU citizenship.

Changes in belonging after Brexit: International civil servants and the reconstruction of European citizenship

The second research question examines whether Brexit has altered the sense of belonging and citizenship of British nationals residing in continental Europe.

A particularly significant finding concerns British nationals who have spent much of their professional lives working for European and international institutions. Because many European institutions are located on the continent, a considerable number of British citizens have built careers in organisations dedicated to European integration and international cooperation. Although the UK left the European Union in 2020, British nationals who were already employed by these institutions before Brexit have continued to work for the European Commission and the European Parliament (hereafter referred to as '*the European institutions*').

The present study includes several such individuals and reveals that, paradoxically, some of the strongest supporters of European integration have experienced considerable insecurity following Brexit. Several of the interviewees are or were employed by international organisations. Their professional careers were dedicated to promoting European integration, and they were opposed to or deeply disappointed by Brexit. Some were severely affected by its consequences. To highlight this irony, the following analysis focuses on these international civil servants' perceptions of Europe, sense of identity and residence status.

Former Council of Europe officers

Strasbourg, often described as one of the capitals of Europe, hosts numerous European institutions. Among them, the Council of Europe (CoE), founded in 1949 with the UK as one of its founding members, continues to employ many British nationals despite Brexit because the UK remains a member of the Council of Europe.

Interviews with current and former British employees of the CoE reveal a significant divide between those who retired before Brexit and those whose retirement occurred during or after the transition period.

Respondents who had retired before Brexit had already secured French residence permits and therefore reported relatively little disruption to their lives after the UK's withdrawal from the EU. Interestingly, however, several abandoned earlier plans to apply for French nationality.

One respondent, *A*, former Council of Europe official, who had lived in Strasbourg since 1983, had previously expressed a strong desire to acquire French citizenship because Brexit would deprive him of voting rights both in the UK and in France, when I first interviewed him in 2017. During a follow-up interview conducted on 28 February 2025 in Strasbourg, however, he explained that his priorities had changed: due to old age, his principal concern was now access to healthcare rather than political participation. Because permanent residence status already guaranteed access to French public services, he no longer considered French nationality necessary.

Similarly, another retired CoE official, *B*, who had moved to France in 1967 and has lived in Strasbourg ever since, remarked that he had been '*working throughout my life to achieve greater integration*' (interview conducted in Strasbourg on 12 March 2025). For him, Brexit was '*a disaster, of course*'. He explained that permanent residence status enabled him to maintain his existing lifestyle and that he was now too old to justify the additional administrative burden associated with naturalisation in order to recover EU citizenship.

Both former European officers described themselves as '*British and European*'. Having worked for European integration throughout their careers, they continued to regard Europe as an important component of their identity despite no longer holding EU citizenship.

Their decisions not to pursue EU citizenship through naturalisation in an EU Member State should not therefore be interpreted as a rejection of Europe. Rather, they reflect a pragmatic assessment that, at their stage of life, the benefits of acquiring French nationality in order to remain in France no longer outweigh the additional administrative burden. British nationality remains sufficient for travel to the UK, whilst advancing age has reduced the practical importance of freedom of movement elsewhere in Europe. Their decisions therefore illustrate that legal citizenship and European identity do not necessarily develop in parallel.

Administrative exclusion and post-retirement insecurity

The experiences of younger former international civil servants present a markedly different picture. *C*, who moved to Strasbourg in 1990 to work for the CoE, was an international civil servant when we met him in 2017. Although he was not eligible to vote in the Brexit referendum, he told us that Brexit would have no particular impact on him. However, he faced significant difficulties after his retirement. While employed by

the Council, his legal status in France was governed by a special residence regime issued through the Ministry of Foreign Affairs rather than by ordinary immigration procedures. During the transition period, under the EU–UK Withdrawal Agreement—which grants British nationals already residing in EU Member States the right to continue living there upon application—he attempted to apply for residence rights. However, local authority (*préfet*) informed him that the CoE’s employees were not eligible to apply for standard residence permits while employed and advised him to wait until retirement. Consequently, when he applied again after retiring, he was informed that his previous status excluded him from protection under the EU–UK Withdrawal Agreement.

As a result, despite having lived in Strasbourg for more than thirty years and having no intention of returning permanently to the UK, *C* found himself trapped in an administrative limbo. Although he has repeatedly demonstrated long-term residence in France and obtained temporary extensions, he continues to await a definitive decision regarding his legal status. As he explained: *‘And now, I’m waiting. It’s a long process because I don’t think I fit the typical criteria anymore.’* (interview on 14 March 2025 in Strasbourg)

The consequences extend beyond administrative exclusion. Now that the UK has left the EU, *C*, a British national without a residence permit, risks being unable to return to his home in France if he travels abroad. Ironically, a person who devoted much of his professional life promoting European integration now faces uncertainty regarding his right to remain in Europe. Despite these difficulties in his life in France, *C* continues to identify as both English and European. Brexit has not altered his sense of belonging. Instead, it has transformed the legal conditions under which that identity can be realised.

European institution official: Importance of family-based EU citizenship

A similar pattern emerged in the case of *D* (interview online on 11 November 2024), who retired from the European institution in 2022. After leaving the UK in 1988, *D* lived and worked in Poland before democratisation. Following Poland’s accession to the EU in 2004, his language skills led to recruitment by the European institution. Upon retirement, he applied for residence rights in Belgium, where he had been living. Like *C*, he was informed that his status as an international civil servant excluded him from protection under the EU–UK Withdrawal Agreement. Faced with legal uncertainty, *D* reconsidered his retirement plans. Rather than remaining in Brussels, he purchased a house in southern France and relocated there in 2022. However, after discovering the complexity and length of French residence procedures, he chose a different strategy: Because his wife is Polish, he applied for residence rights in Poland instead.

His case highlights the growing importance of family ties to EU citizens in the post-Brexit environment. Through his wife’s nationality, *D* gained access to a legal pathway that enabled him to reconstruct rights associated with European citizenship. Nevertheless, *D* does not identify with Poland. He continues to describe himself as both British and European. He explicitly distinguished legal status from cultural belonging, explaining that

Poland's social and cultural environment felt less familiar to him than France. In other words, the citizenship rights he seeks are not necessarily linked to the places with which he feels the strongest emotional attachment.

This finding reveals an important tension between legal status and identity. While citizenship is often assumed to reflect belonging, Brexit has encouraged some individuals to pursue citizenship or residence rights primarily as pragmatic strategies for maintaining mobility and security.

Like *A* and *B* mentioned earlier, *D* is able to live securely with a residence permit for an EU country. So, what sort of British people needs citizenship of an EU country?

Current European civil servant and naturalisation

A Council of Europe (CoE) official, *E*, who moved to France in 1988, stated during our interview in March 2017 that he was applying for French nationality through his wife. Then, he had acquired French nationality in 2020. Asked why, *E* replied:

It was more of a question of stability for the future. (...) If I didn't become French, then at the point of retirement, I would have to get a French residence card and that would be more difficult after Brexit. Even though there's a special card for people who were living here before Brexit, I wouldn't have had one of those because we have a different card when we are international civil servants' (interviewed on 21 June 2024 in Strasbourg).

To avoid the same experience as *C*, *E* applied for French nationality through his wife. It should be noted that, like *D*, he is seeking a family-based pathway to EU citizenship linked to the nationality of an EU member state, rather than the nationality of the country in which he continues to reside.

Cross-border workers and the search for EU citizenship

The experience of *F* demonstrates how Brexit has affected British nationals whose professional lives depend upon cross-border mobility. She resides in Auvergne-Rhône-Alpes but works for an international non-governmental organisation located in Geneva, Switzerland. Prior to Brexit, EU citizenship facilitated free movement between Switzerland and EU Member States. Following the UK's withdrawal, British nationals lost automatic access to these arrangements.

Although the agreement between the UK and Switzerland on citizens' rights following the UK's withdrawal from the EU and the free movement of persons agreement signed in 2019 protects certain categories of workers, obtaining the necessary permits became substantially more difficult. Swiss employers must now demonstrate that no EU citizen is available to fill a position before hiring a British national, creating additional administrative and financial burdens. As *F* explained:

My office needs to prove to the Swiss authorities that nobody else in Europe who applied for the job can do this job. It's a complicated process for my office to do. It's expensive' (interview

online, on 15 July 2024).

F further noted that if she were to lose her current position, obtaining similar employment in the future would be significantly more difficult because she no longer enjoys the rights associated with EU citizenship.

Although she successfully obtained a French residence permit under the EU–UK Withdrawal Agreement and later secured Swiss work authorisation, the experience increased her sense of vulnerability. Consequently, she had begun the process of applying for Irish citizenship, several weeks before our interview. Why did she choose Irish nationality rather than that of her French partner? She explained as follows:

‘Because we know the process takes time, two years minimum in our region, because of course, in our region of France, there are many “frontaliers”, there are many British people who have been living in France for more than five years who are applying’ (interview online, on 15 July 2024).

Moreover, her motivation was not based on Irish national identity. Rather, the application represented a pragmatic strategy for recovering rights lost through Brexit. Because her grandmother had been born in Ireland, she was eligible for Irish citizenship by descent. Observing her mother’s successful naturalisation encouraged her to pursue the same route. As she explained: *‘I do start to feel less secure’*.

F’s case illustrates particularly clearly how citizenship can become detached from subjective belonging. Although she continues to describe herself as British, international and European, she seeks Irish citizenship primarily as a means of restoring freedom of movement and securing future employment opportunities.

Taken together, these cases demonstrate that Brexit has encouraged British nationals to distinguish between legal citizenship as a means of securing rights and European identity as a continuing sense of belonging.

Discussion

Based on the interviews with current and former employees of European and international organisations, three principal findings emerge.

British–European identity unchanged

Firstly, these findings demonstrate that Brexit has not fundamentally transformed the identities of British nationals who have devoted their professional lives to European and international organisations. The loss of EU citizenship has not led to the disappearance of European identity among them. Although they no longer possess EU citizenship, many continue to identify as European. Their European identity coexists with their

British national identity, as illustrated by respondents such as *A* and *B*, who consistently described themselves as ‘*British and European*’. These findings demonstrate that Brexit has not fundamentally altered their sense of belonging to Europe.

Without EU citizenship, these British nationals continue to regard themselves as Europeans. These findings may be interpreted as the reverse of Yanasmayan’s argument, which distinguishes between the legal and emotional dimensions of citizenship. Whereas Yanasmayan argues that individuals may acquire dual nationality without developing an emotional attachment to the state concerned in order to secure legal rights, the respondents in this study retained a strong sense of European belonging despite losing the legal status of EU citizenship.

Thus, what has changed is not their identity but their legal security in Europe. For many respondents, Brexit created new administrative barriers that challenged their ability to live, work, and move freely across Europe, generating uncertainty about their ability to continue their previous way of life. Faced with this uncertainty, many applied for residence permits under the EU–UK Withdrawal Agreement as an alternative legal means of restoring legal security, since British nationals residing in France were entitled to apply for residence permits during the transition period in order to preserve the residence rights guaranteed under that Agreement.

Are the British European officers undeserving of the privilege of staying put?

However, this study also demonstrates that British officers working for European institutions were unable to change their residence status during the transition period because they already held a special residence status as international civil servants. Consequently, *C* and *D* were unable to regularise their residence status upon retirement. According to *E*, this situation could affect anyone who had been employed by an international organisation since before the transition period and who intended to continue living in an EU Member State after leaving their post.

Thus, despite having devoted their professional lives to European integration, these international civil servants—who might reasonably be regarded as exemplary Europeans—found themselves excluded from the legal protections designed to preserve existing rights after Brexit. Their ability to continue residing in Europe now finds itself under threat. In response to Benson’s argument that Brexit has created a new distinction between those who are ‘*deserving*’ and ‘*undeserving*’ of ‘*the privilege of staying put*’, an important question arises: should these individuals also be regarded as undeserving? Paradoxically, it is precisely those who contributed most directly to European integration who now find themselves facing the greatest legal uncertainty as a consequence of the decision taken by their country of nationality.

Reconstructing citizenship among British living in Europe

The findings further demonstrate that, even in such cases, as illustrated by the cases of *D* and *E*, respondents whose spouses were EU citizens could avoid this risk by applying for a residence permit or naturalisation on the basis of their family ties. Similarly, as illustrated by the case of *F*, some respondents sought citizenship of an EU Member State that was their ancestor's country of origin, despite having never lived there.

In this way, obtaining residence rights or naturalisation through family ties or ancestral links has become a means of reconstructing the legal rights formerly associated with EU citizenship. These findings support previous arguments that European identity is compatible with multiple and overlapping forms of belonging, rather than being exclusive or territorially bounded.

Furthermore, respondents who considered residence rights to be insufficient sought naturalisation. By contrast, a few respondents, such as *A* and *B*, changed their views as they grew older and came to regard residence rights as sufficient. Since most European countries recognise dual nationality, acquiring the citizenship of an EU Member State represents a form of compensatory citizenship that has acquired particular value for British nationals following Brexit. Moreover, as illustrated by the case of *F*, the relative ease of the application process also influenced respondents' decisions. These findings indicate that strategic citizenship practices have become increasingly evident among British nationals living in Europe.

Cases such as *D*, who obtained residence rights through his wife's nationality while expressing little sense of belonging to that country, and *F*, who acquired citizenship by descent despite having no intention of residing there, may be understood as examples of Yanasmayan's '*thin sense of citizenship*'. In *F*'s case, such citizenship can be regarded as a non-territorial legal status. As Joppke (2018) argues in relation to external citizenship, granting citizenship without a residence requirement raises questions concerning the absence of a '*genuine link*' with the state concerned. Furthermore, whilst ancestral citizenship reflects states' efforts to maintain ties with their diasporas, for many applicants it primarily functions as a means of securing mobility within the EU (Blanchard, 2025).

These strategies for mitigating legal insecurity include not only the conventional route of obtaining permanent residence under the EU–UK Withdrawal Agreement, but also securing residence rights or citizenship through family ties or ancestral links to an EU Member State. Accordingly, Brexit did not simply result in the loss of EU citizenship; it also generated a new process through which British nationals sought to reconstruct the legal rights formerly associated with EU citizenship in order to preserve their lives in Europe. In this respect, the concept of reconstructing citizenship provides a useful analytical framework for understanding British nationals' responses to Brexit.

Rather than passively accepting the consequences of Brexit, many British nationals have actively sought to reconstruct forms of legal membership that enable them to remain and work within a European space. Taken together, these findings suggest that reconstructing

citizenship is not simply a legal response to Brexit but also a strategic process through which British nationals seek to restore rights while maintaining a continuing sense of European belonging.

On family reunification as a fundamental right of EU citizenship

Under Article 21 of TFEU, EU citizenship guarantees freedom of movement and residence, while Directive 2004/38/EC extends these rights to qualifying family members. Although this Directive establishes family reunification as a fundamental right of EU citizens, its application to third-country nationals has historically been less clear. Since the *Zambrano* judgment, however, there has been a discernible trend towards extending the scope of family reunification to include certain categories of third-country nationals (Bouveresse, 2020, pp. 92–93). Against this background, an important question arises: to what extent does this fundamental right continue to protect British nationals following Brexit?

In *D*'s case, as the family member of an EU citizen, he appears to retain the right to family reunification and is therefore entitled to continue residing in France. However, the situation is more complex for British couples who have become third-country nationals. Although their residence rights remain protected so long as they continue living in their country of residence, it remains uncertain whether equivalent protection would apply if they were to relocate to another country (Bouveresse, 2020, p. 92–93). Consequently, all of the British couples interviewed were careful to ensure that their stays outside France did not exceed the permitted 90-day period.

Family ties with citizens of EU Member States therefore broaden the opportunities for British nationals to remain within the EU. Nevertheless, even when respondents continue to regard themselves as Europeans, regaining EU citizenship is often neither straightforward nor automatic. For this reason, many have strategically reconstructed their citizenship status through family ties or other legal pathways. However, the legal status acquired through such strategies does not necessarily imply a corresponding sense of belonging to the Member State whose nationality has been acquired. Rather, these legal arrangements function primarily as mechanisms for preserving rights of residence and mobility within Europe, while European identity itself continues to be directed towards Europe as a whole rather than towards any single nation-state.

Conclusion

This article has examined the impact of Brexit on the lives, citizenship status, and European identity of British nationals who continue to reside in EU Member States, focusing in particular on British nationals living in France who have worked for European and international organisations. Through a phenomenological qualitative analysis of interviews conducted between 2023 and 2025, this study found that British international civil servants retained a strong sense of European identity even after losing EU citizenship

and that many were unable to obtain residence rights under the EU–UK Withdrawal Agreement upon retirement. Ironically, those who devoted their professional lives to European integration found themselves unable to continue living securely in Europe because of decisions taken by their country of nationality—a country in whose referendum many of them were not even entitled to vote.

To respond to this legal insecurity, many respondents strategically reconstructed their citizenship through family ties, ancestry, residence rights, or naturalisation in EU Member States. Although these legal strategies were often motivated by a continuing sense of European identity, they did not necessarily imply a corresponding sense of belonging to the Member State whose nationality was acquired.

This study therefore argues that Brexit has generated a new process of reconstructing citizenship, through which British nationals seek to recover the legal rights formerly associated with EU citizenship while maintaining a continuing sense of European belonging.

The findings concerning the legal status of former international civil servants and the reconstruction of citizenship are particularly relevant for EU Member States such as France and Belgium, where dual nationality is recognised but where complex administrative procedures continue to shape access to residence rights and naturalisation.

Ultimately, this study demonstrates that, although Brexit has fundamentally altered the legal foundations of EU citizenship, it has not necessarily diminished European identity. Instead, it has encouraged British nationals to reconstruct legal forms of membership while maintaining a continuing sense of belonging to Europe.

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AI Statement

Artificial intelligence (AI) tools were used solely to assist with English language editing, including improvements to grammar, style, clarity, and academic expression. All aspects of the research, including the study design, theoretical framework, data collection, data analysis, interpretation of the findings, and conclusions, were conducted by the author. The author reviewed and verified all AI-assisted revisions and takes full responsibility for the content of the manuscript.

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