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Multi-Level Citizenship and the Experiences of Roma EU Citizens in the UK:

Evidence from Sheffield and Glasgow

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A thesis submitted in partial fulfilment of the requirements for
the degree of Doctor of Philosophy.

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Submission Date: August 2022

Abstract

This thesis examines how European Union citizenship was experienced by migrant Roma in the UK by asking the following questions. What opportunities did this 'multi-level' form of citizenship afford to migrant Roma in the UK? What constraints did it impose on them? How were the opportunities and constraints of multi-level citizenship experienced similarly or differently by migrant Roma in different places in the UK, with a particular focus in this study, on the cities of Sheffield and Glasgow? To answer these questions, the thesis deployed an abductive research strategy that explored both the broader economic, legal and local bureaucratic structures and considered the lived experiences of Roma, via a series of semi-structured interviews with Roma and policy stakeholders conducted in 2017/18 in Sheffield and Glasgow. The thesis shows that the right to free movement entailed in EU citizenship, coupled with important gaps in UK labour markets, presented Roma - who frequently experienced endemic discrimination in CEE countries - with important opportunities to create a better life for themselves. However, the right of EU citizens to reside in a 'host' member state comes with conditions, particularly associated with the maintenance of a level of economic 'self-sufficiency', which proved difficult for many Roma to satisfy. This created significant hardships for Roma as they negotiated the vagaries of the UK's flexible labour markets and welfare state. A key finding of this PhD thesis was that many Roma EU citizens were not engaged in the formal labour market and/or welfare state. The primary contribution of this thesis is to show how these opportunities and constraints were experienced by Roma in the UK, but also, crucially, the ways in which they were mediated at the local level leading to common but also divergent experiences for Roma in Sheffield and Glasgow. In so doing, the thesis offers an illustrative example of multi-level citizenship in action, contributing to the broader scholarship on EU citizenship, Roma and EU citizenship, and Roma in the UK.

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In loving memory of my father, Robert Duncan (1951-1993)

Disce pati


Acknowledgements

I am indebted to many people for the support that they have offered to me during the course of this project. First, I would like to express my gratitude to my supervisor, Dr Owen Parker, for his guidance, patience, and unwavering belief in my capacity and potential to realise this thesis. His expertise and suggestions have informed every stage of this project, from the original application for funding to this, the final submission. Special thanks are also due to Professor Peter Dwyer who steered this project until all but the final year, and Professor Alasdair Cochrane who would supersede him thereafter. I am indebted to them all and eternally grateful. I would also like to thank Professor Andy Hindmoor for his advice and guidance on best practice in the classroom, and Sarah Cook for both the efficiency with which all administrative queries and worries were resolved and the compassion that she showed to all PhD researchers in the Department of Politics at the University of Sheffield.

A special thanks, of course, goes to my research participants without whom this project would not have been possible. Thank you for trusting me with your experiences and your stories - I will be forever in your debt. I am grateful, also, to the late Andy Shallice, the Roma Support Group, Arthur Ivatts and Dave Zabiaga for so willingly sharing their knowledge and time.

Thank you to the PhD community at Sheffield (Sam Morecroft, Mary Anne Hill, Katherine Smith, Indra Mangule, Blagovesta Tacheva, Andrew Arnott, James Chamberlain, Davide Schmid, Charlotte Godziewski, Sam Jarvis, Vanessa Bilancetti, Robbie Pye, Scott Lavery, Basia Yoxon, Zhang Shizhi, James Weinberg, Jonny Webb) for the warm welcome, the laughter, and the friendships that have lasted the test of distance and time. I should also extend my gratitude to Alice Welsh for the conferences, the cocktails and the hangovers that ensued.

A note of thanks also to my colleagues at Citizens Advice for their understanding and empathy these last two years. Balancing work and a PhD was never going to be easy but your encouragement and support made it that much more feasible. Particular thanks to Dr Elizabeth Blakelock, Dr Amy Smith and Farhana Begum without whom I may never have finished writing this thesis.

I am thankful too to my non-academic friends and family. In particular, I would like to thank my Mum, Denis, my brother (Robbie), sister in law (Heather) and my beautiful nieces (Grace and Casey) for always reminding me that there is more to life than my studies. And, of course, thanks to my most loyal and spoiled companion - Fonzie. I like to think that you are my sidekick, but in reality I am yours - and despite your independence, eccentricities, and bourgeois proclivities, you'll always be my boy .

Last but by no means least, to my partner, Greg Herman: you have borne witness to the trials and tribulations of this PhD project and have remained my constant cheerleader throughout. I am and will remain eternally grateful to you for both your patronage and your proofreading. Nb any errors of grammar or lexis in the pages which follow are his fault.

Finally to those whom I have forgotten or excluded from this list, I apologise. Without you all this thesis would not exist.

Declarations

I, the author, confirm that this thesis is my own work. I am aware of the University's Guidance on the Use of Unfair means (www.sheffield.ac.uk/ssid/unfair-means). This work has not previously been presented for an award at this, or any other, university.

This work was supported by the Economic and Social Research Council [grant number: ES/J500215/1].

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Table of Acronyms

Attendance Allowance	AA
Central and Eastern Europe	CEE
Disability Living Allowance	DLA
Department of Work and Pensions	DWP
English for Speakers of Other Languages	ESOL
Employment Support Allowance	ESA
European Court of Justice	ECJ
European Union	EU
Genuine Prospects of Work Test	GPOWT
Her Majesty's Revenue and Customs	HMRC
Jobseekers Allowance	JSA
National Roma Integration Strategies	NRIS
Non-Governmental Organisations	NGOs
Minimum Earnings Threshold	MET
Pay As You Earn	PAYE
Personal Independence Payments	PIP
Scottish National Party	SNP
Special Non-Contributory Benefits	SNCB
Treaty on the Functioning of the European Union	TFEU
UK Independence Party	UKIP
Universal Credit	UC
Workers Registration Scheme	WRS

Introduction: Why are Roma EU citizens' experiences of multi-level citizenship in the UK important?

Roma are the largest and most discriminated against ethnic minority group in Europe (World Bank, 2017). Their unemployment rate is between two and five times higher than that of non-Roma in Central and Eastern Europe (CEE); only 15% of young Roma adults have completed upper-secondary education, compared to 70% of the non-Roma population; and around 45% of Roma households lack basic housing amenities such as electricity, an indoor kitchen, an indoor toilet, and an indoor shower or bath (World Bank, 2017). However, in 2004, the Czech Republic, Slovakia, Poland, Hungary, Slovenia, Estonia, Latvia and Lithuania (the A8 member states) joined the European Union (EU). Subsequently, in 2007, Romania and Bulgaria (the A2 member states) were also permitted membership of the EU. The accession of A8 and A2 countries was important for Roma EU citizens resident in CEE countries because all nationals belonging to the member states of the EU have the right to move freely within its borders and to enter and reside in any other EU member state (Article 21 of the Treaty on the Functioning of the European Union). As such, EU citizenship and the right to free movement presented Roma EU citizens with an opportunity to escape endemic racism and create a better life for themselves.

There are, however, certain restrictions to this freedom. In EU law those who wish to claim residency rights are required either to be a worker or self-employed person, or have sufficient resources and comprehensive health insurance so that they do not become a 'burden' on the social system in their host state (see Chapter 5). Therefore, Maas (2013a: 93) has suggested that the rights of EU citizens¹ are conditional upon the 'desirability' - i.e. the economic status - of the individual. As a result of the endemic discrimination that Roma experience, the employment rates of Roma are lower than those of non-Roma EU citizens (FRA, 2011). Thus, intra-EU mobility has reinforced pre-existing prejudices

¹ The term EU citizens is used throughout this PhD thesis to refer to EEA nationals – i.e. those who are national citizens of Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden.

towards Roma as workshy, uneducated, predisposed to criminality and reliant on handouts (Martin *et al.*, 2017). This has had significant implications for Roma in Europe with Roma in Italy being collectively expelled in 2008 and Roma in France being targeted and then deported in 2010 (see Aradua, 2009; Van Baar, 2011, Parker, 2012). However, while many of the debates about the expulsions of Roma from France were framed in terms of controversy between the EU and one its member states (see Van Baar, 2011; Parker, 2012), EU law permits member states to remove those EU citizens who are either not exercising their treaty rights or who are perceived to pose a threat to public policy, public security or public health. There is a 'securitizing and exclusionary potential within the EU law pertaining to citizenship and free movement and within a multi-level liberal or cosmopolitan government in general' (Parker, 2012: 488). Accordingly, EU citizenship can be seen to present both opportunities - i.e. the opportunity to engage in free movement and access paid employment in another EU member state - and constraints - i.e. limited access to social and residence rights in their host member state - for mobile Roma EU citizens.

There are also significant variations between the EU's member states' application and understanding of citizenship. This means that 'on the ground' EU citizenship will be experienced very differently in different member states. First, an individual's location within Europe has a major influence on the extent and quality of rights available to them (Dwyer, 2010: 174) with paid labour markets and welfare systems differing depending on the mobile EU citizen's chosen host member state. Secondly, EU member states have significant leeway to interpret the EU law pertaining to free movement as they see fit. And finally, an EU citizen's experiences of EU citizenship can change over time with shifting political structures at the supranational, member state, national and local levels interacting to constitute different rights for EU citizens in different historical periods. Rather than being a 'fundamental status' then, EU citizenship is a 'conditional promise' (Dwyer *et al.*, 2019) with the rights of EU citizens first and foremost being dependent upon, at least in the vast majority of cases: intra-EU mobility; the economic criteria; the chosen state of residence; and the interaction of shifting political structures at various levels. This PhD thesis thus investigates EU citizenship as a 'conditional

promise' (Dwyer *et al.*, 2019) through the prism of Roma EU citizens' experiences in Sheffield and Glasgow.

In order to capture the ambiguity within EU citizenship, the multi-level citizenship (Maas, 2007; 2013b; Faist, 2001) framework is utilised throughout this thesis. This framework not only draws attention to the fact that EU citizenship is situated at various levels (the EU, member state, national and local levels) but also deals explicitly with the interaction of different levels of citizenship in order to show that changes on one level have feedback effects, and often entail potential adaptations on another level (Faist, 2001). The central research question that underpins this research is, therefore, how is multi-level citizenship experienced by migrant Roma in the UK? More specifically, the research seeks to understand the opportunities and constraints presented to migrant Roma by multi-level citizenship in the UK. In addition, whilst existing literature has engaged with the topic of Roma EU citizens' experiences of multi-level EU citizenship (Parker and López Catalán, 2014), the ambiguity inherent within multi-level citizenship has thus far *only* been explored across the EU member states rather than *within* an EU member state. With this in mind, the research also explores how the opportunities and constraints of multi-level citizenship are experienced similarly or differently by migrant Roma in Sheffield and Glasgow. The overarching aim of the thesis is thus to provide an illustration of the concept of multi-level citizenship (Maas, 2013b) in practice (explored further in Chapter 2), with reference to both a vulnerable group and the local level *within* an EU member state. In so doing, it builds on the existing literature (Parker and López Catalán, 2014) concerning the contingent nature of post-national citizenship.

This introductory chapter outlines the key reasons why the research is focused on Roma EU citizens' experiences in Sheffield and Glasgow before presenting the research questions that will be answered and the key contributions that the research will make to the existing literature. The chapter proceeds in 10 sections. Section 1 is concerned with the treatment of Roma in CEE countries. Section 2 outlines the reasons why the research was concerned with Roma as EU citizens. Section 3 gives a

brief overview of EU citizenship as conditional citizenship with the aim of highlighting that the rights that mobile EU citizens can access vary depending upon their chosen EU member state. Section 4 discusses the theoretical conceptualisation of EU citizenship as multi-level citizenship (Maas, 2007; 2013b; Faist, 2001). Section 5 outlines the reasons why this PhD project was focused on mobile Roma EU citizens in the UK. Section 6 extends the previous discussions of EU citizenship as multi-level in that it highlights that the different discourses, paid labour markets and welfare systems at the national level (England and Scotland) may have substantial implications for the ways in which Roma EU citizens experienced their EU citizenship status. Section 7 outlines the reasons why the research was concerned with Roma EU citizens' experiences in Sheffield and Glasgow. The research questions that the PhD project will answer are presented in section 8. The academic contributions that the project makes are outlined in section 9. Finally, the chapter outline is presented in section 10.

Section 1: Why Roma?

The term 'Roma' is contested (see Kovats, 2001). Nonetheless, it is now widely used throughout Europe to refer to a diverse range of communities including Kalderash in South-Eastern Europe; Romanichals in England; Sinti in Germany, Italy and France; Kale in Wales, Finland, Spain and Portugal; and Gitano from Spain, as well as many others (Amnesty International, 2015). As such, Roma are one of the largest ethnic minorities in Europe with an estimated population of 10-12 million (Amnesty International, 2011: 3). Two thirds of Europe's Roma population reside in CEE countries where they make up between 5 and 10% of the population (Amnesty International, 2015).

It is believed that Roma migrated from Northern India to Europe from the 9th century onwards (Amnesty International, 2015). However, the political establishment and the church soon started to view Roma as suspicious outsiders (Amnesty International, 2015). As a result, up until the 19th century, Roma in Europe were often forced into slavery, expelled from their homes and/or sentenced to death (see Amnesty International, 2015). Moreover, during the Second World War (1939-45), the Nazis perceived Roma to be 'racially inferior' and so stripped them of their citizenship, forced them

into ghettos and deported them to concentration camps. It is estimated that 25% of Europe's pre-war Roma population died as a result of Nazi persecution (Haider, 2020). However, with the end of the Second World War, the situation for Roma in CEE countries improved on account of the rapid industrialisation at the heart of the Soviet economy which required an almost unlimited supply of manual labourers (Guy, 2001). As a result, Roma achieved a limited legitimacy within state socialism (Guy, 2001). The fall of communism in the CEE region, however, resulted in Roma being almost universally unemployed, and so seeking security for themselves through claims for social benefits, engagement in the informal economy and subsistence crime (Guy, 2001). A further consequence of the inability of Roma to access paid employment then, often as a direct effect of institutional discrimination, alongside rising unemployment rates and political instability in CEE countries, was that Roma found themselves cast in their familiar if involuntary role of scapegoats (Guy, 2001). As Guy (2001: 23) notes:

[M]any Roma are forced daily to conform to their negative stereotype in local eyes as work-shy, scrounging thieves, while those who behaved quite differently are nevertheless branded in the same image.

This situation is further compounded since Roma communities in CEE countries experience endemic discrimination and exclusions in relation to housing (European Agency for Fundamental Rights, 2011); health (Council of Europe, 2011), education (Marusak and Singer, 2009) and employment (Guy, 2001, 2009). And yet, prior to the A8 enlargement, the fragmentation of Yugoslavia meant that Western Europe regarded the possibility of ethnic conflict to be one of the primary threats to European security. As a result, and in contrast to previous EU enlargements, the key principle of conditionality was enshrined within the Copenhagen Criteria. The Copenhagen Criteria required that candidate states had achieved stable institutions guaranteeing democracy, the rule of law, respect for human rights and the protection of minorities, as well as a functioning market economy (Guy, 2001). Within the context of EU enlargement then, the entrenched discrimination and exclusion of Roma

minorities in their countries of origin was acknowledged as a significant factor undermining CEE states' entry into the EU (Guy, 2001).

The PHARE financial support programmes sought to improve the situation of Roma within CEE countries through a focus on their political, civil, economic and social rights. However, the material conditions of Roma minorities in CEE countries were addressed through the non-binding Framework Convention for the Protection of National Minorities. This meant that while the political and civil rights of Roma minorities were highlighted as a result of the requirement in the Copenhagen Criteria, the candidate countries largely ignored their social and economic rights (Guy, 2009). The result of this was that whilst the PHARE programmes may have improved respect for Roma's political and civil rights, they did little to improve Roma EU citizens' access to the paid labour market. Moreover, rather than improve the material conditions of Roma in CEE countries, the Copenhagen Criteria reinforced and reshaped pre-existing racialised understandings of Roma as economically 'inactive' (Guy, 2009; see also Van Baar, 2012). Accordingly, there is a need to develop an understanding of the ways in which a 'particularly vulnerable' (Dagilyte and Greenfields, 2015) group of EU citizens experience their EU citizenship status in their everyday lives.

Section 2: Why Roma EU Citizens?

Given the aforementioned endemic discrimination that Roma experienced (and continue to experience) in the CEE region, many Roma sought to claim asylum in Western Europe during the 1990s. Perhaps unsurprisingly, their asylum claims were often unsuccessful because not only was the mobility of Roma largely perceived to be economic (Guy, 2001) but also all CEE states were perceived to be safe (Guy, 2003). As such, EU membership following the A8 and A2 enlargement, and the EU citizenship that this delivered, presented an opportunity for Roma to move away from their 'home' state with greater ease. Nonetheless, Roma persecution (in both 'home' and, as we shall see, also 'host' member states) means that their mobility can be seen to occupy a grey area between

seemingly *free* movement and *forced* mobility (Poole and Adamson, 2008; see also Cook *et al.*, 2011).

EU citizens have a right to free movement and non-discrimination on the grounds of nationality in their host state. Consequently, Bellamy (2001; see also Bellamy, 2019) has suggested that EU citizenship amounts to a 'right to have rights' because outside of the EU's legal framework it is impossible for an individual to claim rights. However, as outlined in greater detail in Chapter 5, the right to non-discrimination on the grounds of nationality is constrained in important respects: EU citizens, who wish to claim residency rights in their host state, are required to be a worker or self-employed person, or have sufficient resources and comprehensive health insurance so that they do not become a 'burden' on the social system in their host state. Whilst EU citizenship can thus be seen to amount to the 'right to have rights' (Bellamy, 2001; see also Bellamy, 2019), this 'right' only exists for those who meet the requisite conditions.

In practice then, EU citizenship presents both opportunities and constraints for mobile EU citizens. In the case of Roma EU citizens, EU citizenship provides them with the opportunity to escape the endemic discrimination that they experience in CEE countries. However, and as a result of that discrimination, the employment rates of Roma are lower than those of non-Roma EU citizens (FRA, 2011). Accordingly, there is a need to understand how Roma EU citizens experience their EU citizenship status since they are both more likely than non-Roma EU citizens to benefit from the opportunities presented by EU citizenship but also less likely than non-Roma EU citizens to meet the economic conditions required for residence.

Section 3: EU Citizenship as Conditional Citizenship

On the 25th July 1952, the Paris Treaty entered into force. This established the European Coal and Steel Community and the free movement of workers in the coal and steel industries. As such, it is often heralded as the first step towards a common citizenship within Europe (Maas, 2007). However,

the free movement of workers was slow to implement and so, on the 1st of January 1958, the Treaty of Rome was introduced. The Treaty of Rome not only established the European Economic Community but also set firm deadlines for the implementation of free movement and established the European Commission in order to enforce them. In doing so, it recast employment provisions as individual rights and established the principle of non-discrimination between member state nationals in order to ensure an ever closer union between the European people (Maas, 2007).

The Treaty of Rome and the subsequent case law in relation to the social rights of workers within the European Economic Community were underpinned by a view that the free movement of workers was a vehicle not only for economic integration but also political integration. As Maas (2007: 5) notes 'free movement is the bedrock upon which the entire construction of European rights has been built.' Accordingly, free movement, which was established by the Maastricht Treaty in 1992, gave all EU citizens – that is, all citizens of a member state of the EU – the right to free movement within the EU, and the right to non-discrimination on the grounds of nationality.

EU law thus grants EU citizens the right to move to, reside in and work in the territory of a member state other than that in which they are citizens and access, at least theoretically, the same social benefits as national citizens. However, the EU's economic origin was also enshrined in secondary EU legislation with EU citizens being required to show a 'real link' with their host member state. As such, the 'real link' issue has been a recurrent theme in EU case law. Initially, European Court of Justice (ECJ) decisions implied that over time the status of European citizens would be dissociated from engagement in economic activity (Menedez, 2010). However, since 2010, ECJ case law has made it increasingly permissible for member states to restrict access to social rights for the economically vulnerable (see Chapter 5). It is for this reason that it has been suggested (O'Brien, 2017) that the EU's legal framework creates disadvantages and exacerbates destitution along the lines of class and gender whilst penalising those who have, or are, children.

There are, however, significant variations between the EU's member states. These variations mean that 'on the ground' EU citizenship will be experienced very differently in different member states. First, different member states will have different labour market conditions. For instance, on the one hand, liberal market economies tend to be characterised by more flexible labour markets and so they are associated with easier labour market access, but fewer employment rights and protections (Ruhs and Martin, 2008). On the other hand, coordinated market economies tend to have more regulated labour markets and so are less open but associated with greater employment rights for workers (Ruhs and Martin, 2008). In short, as Ruhs and Martin (2008) have suggested, there is likely to be an important asymmetry in the relationship between the number and the rights of migrant workers (see Chapter 3) even within the context of the EU and EU citizenship. In the UK - the focus of this study - we see a combination of open and flexible labour markets (providing work opportunities for migrants) and relatively limited worker protections.

Moreover, member states have significant leeway to interpret EU law pertaining to free movement. In EU law the definition of a worker is very broad with part-time workers and low-paid workers still fulfilling the criteria for 'worker' status (see Chapter 5). Nonetheless, the ways in which EU member states define and implement EU worker status differ across Europe. The UK, for example, required EU citizens to meet a Minimum Earnings Threshold (MET) before classifying them as EU workers (see Chapter 5). With this example, it becomes apparent that whilst EU law permits EU citizens an unconditional right to leave their country of origin and enter a host member state, their right to claim rights in their host member state is still *conditional*. In many cases, rights can – as noted above - only be claimed by residents and residency is, in turn, dependent upon worker status. Notwithstanding the guidance offered by EU law and jurisprudence, definitions of who constitutes a worker vary in different member states.

In addition, there is also considerable variation in the substantive welfare provision of the EU member states: even where EU citizens are able to claim their 'right to have rights', when they have

recourse to welfare, what is on offer will differ substantially in different member states. Indeed, with the exception of Italy, the welfare systems of the founding member states can be classified as conservative regimes in which benefits are often contributory and aimed at maintaining existing social patterns (Esping-Anderson 1990). However, the accession of the UK and Denmark to the EU in 1973 added liberal and social democratic welfare states and the disparities in these regimes grew yet further with the accession of the CEE states (Bruzelius *et al.*, 2018). In the UK, we see a liberal welfare state, meaning minimal welfare, modest social provisions and frequent means testing (and so often 'non-contributory' benefits) (see Chapter 5).

The experience of EU citizenship can therefore vary for three principal reasons. First, it will be dependent upon the structure of the paid labour market in a given host member state: this will have implications for both the availability and security of work. Second, a right to claim rights is dependent upon the recognition of an EU citizen's economic status within a host member state (with worker status still particularly important). And third, if an EU citizen's 'right to have rights' (Bellamy, 2001) is recognised at the member state level, the social rights that they can access will depend on the institutional structure of the welfare system in the host member state.

Section 4: Why EU Citizenship as Multi-Level Citizenship?

As noted in Section 3, EU law grants EU citizens the right to move to, reside in and work in the territory of a member state other than that in which they are citizens and access, at least theoretically, the same social benefits as national citizens. The establishment of EU citizenship in 1992, and subsequent case law of the ECJ generated both excitement (Kostakopolou, 2005) and criticism (Menedez, 2010) from academic audiences because ECJ decisions implied that over time the status of European citizens would be dissociated from engagement in economic activity. However, and as also illustrated in Section 3, recent ECJ case law has made it increasingly permissible for member states to restrict access to social rights for the economically vulnerable (see Chapter 5). Moreover, the EU's commitment to 'subsidiarity' (see Chapter 5) - i.e. the idea that decision making

should be as close as possible to citizens and that policy decisions should be taken at the lowest tier of government that is compatible with effectiveness - not only reflects a wider understanding of the role of regions within the European project (Painter, 2008) but may also lead to very different experiences for both EU citizens and national citizens on the ground.

There is thus a need for a conceptual framework of EU citizenship that captures the ambiguities of Roma EU citizens' lived experiences. In this regard, Parker and López Catalán's (2014) research is of interest since it utilises a multi-level citizenship approach (Maas, 2007; 2013b; Faist, 2001) to explore the lived experiences of Roma EU citizens in France and Spain. In so doing, it finds that despite the more permissive legal framework in Spain, the rights of mobile Roma EU citizens were nevertheless being withheld at the local level in Barcelona. In many ways their study of Roma EU citizens' experiences in France and Spain can be seen to be the catalyst of this research project with their use of the multi-level citizenship (Maas, 2007; 2013b; Faist, 2001) approach not only allowing the authors to highlight the opportunities and constraints presented to Roma by EU citizenship but also the increasingly complex, multileveled dimensions of citizenship in practice.

The multi-level citizenship (Maas, 2007; 2013b; Faist, 2001) approach starts from the observation that EU citizens enact their rights as EU citizens when they engage in free movement. However, the rights of mobile EU citizens are also perceived to be conditional upon the 'desirability' of the individual (Maas, 2013a: 93). This is important because it allows us to capture the ways in which agency is both possible and constrained (i.e. the opportunities and constraints) within the framework of EU citizenship (see Chapter 2).

The multi-level citizenship approach (Maas, 2007; 2013b; Faist, 2001) also moves beyond a simple analysis of such opportunities and constraints. Within the multi-level citizenship approach (Maas, 2007; 2013b; Faist, 2001) the structure of EU citizenship is not perceived to be pre-determined but rather constituted by the practices of multiple actors at multiple levels. Therefore, instead of viewing either the EU or the EU's member states as the primary drivers of EU citizenship and the producers of

the rights of EU citizens, the multi-level citizenship (Maas, 2007; 2013b; Faist, 2001) approach draws attention to the ways in which political authority is shared and negotiated among a variety of actors at multiple levels. As Faist (2001: 46) notes, 'what has evolved in the EU is an extraordinarily intricate network of overlapping social rights in which Member States play a central role but by no means an exclusive role.'

This is important because within the legal literature (Kostakopolou, 2005; Menendez, 2010; Thym, 2015; O'Brien, 2013; 2015; 2017; 2021a; Welsh, 2021), in many ways dominant in relation to the study of EU citizenship, the focus tends to be on the legal framework at the EU level, its transposition into national law and the subsequent case law. These factors are undoubtedly significant. But the legal literature has failed to encapsulate the full experiences of EU citizens. The multi-level citizenship (Maas, 2007; 2013b; Faist, 2001) perspective, in contrast, offers a more holistic understanding of those experiences than the legal literature, because it brings to the fore the opportunities presented by labour markets, the constraints presented by welfare systems and the impact of the variable implementation of laws and rules by local level bureaucrats. In other words, it emphasises the subjective experiences of mobile EU citizens. Admittedly, the subjective experiences of mobile EU citizens have to some extent been captured in some of the ethnographic accounts of EU citizenship, notably the work of Favell (2008a). However, his account was focused on educated and highly skilled mobile EU citizens who to a large extent faced very few barriers when they enacted their right to free movement and residence within a host EU member state.

The multi-level citizenship (Maas, 2007; 2013b; Faist, 2001) approach then captures both the opportunities and the constraints presented to Roma by the legal framework of EU citizenship. But it does not perceive these opportunities and constraints to be manufactured solely by the EU or the EU member states. Rather, the multi-level citizenship (Maas, 2007; 2013b; Faist, 2001) approach perceives EU citizenship to be a political project that is not necessarily tied to a particular state but rather exists over, under, around and through nation states (Maas, 2013b: 3). Accordingly, this

approach was selected as the conceptual framework for this PhD because it allows me to ‘*capture the nuances of citizenship in practice* both at different levels and in different places and times’ (Maas, 2013b: 6 - emphasis in the original) (see Chapter 2).

Section 5: Why Roma EU Citizens in the UK?

The UK had the most flexible labour market of the EU15 (Anderson, 2010). As such, the flexibility of the paid labour market in the UK created the necessary opportunities for EU citizens to access their rights as EU workers. Prior to 2004, intra-EU migration had only risen slightly since the 1970s (Favell, 2008b). However, the CEE member states not only had significantly lower living standards when compared to the EU15 but also had significantly higher levels of unemployment (Pollard *et al.*, 2008). Accordingly, in 2019, it was estimated that there were 3.7 million EU citizens living in the UK with 47% of these EU citizens having come from the CEE member states (Migration Observatory, 2020).

Roma EU citizens have been included in these flows of CEE EU citizens with research (Brown *et al.*, 2013) estimating that in 2012 there were at least 197,705 migrant Roma living in the UK. Roma settlement in the UK can be understood to have originated from the settlement of a small number of Roma refugees prior to the 2004 enlargement. However, the paid labour market has also played a key role in attracting migrant Roma with Fremlova *et al.* (2009) (see also Dagylites and Greenfields, 2015; Clark, 2017), for example, finding that a majority of their research participants had migrated to the UK in order to find work and provide a better life for their children: indeed the flexibility of the UK’s paid labour market may have provided opportunities for Roma EU citizens to access paid employment (see Chapters 3 and 4).

It is also important to remember that support for the EU had generally been lower in the UK than it had in other European countries. Following the 2004 EU enlargement, over a million EU citizens from CEE countries migrated to work in the UK and Ireland (Ruhs and Martin, 2008). This had substantial implications for the UK for two reasons. First, prior to the ‘big bang’ enlargement, the Westminster

government was under the impression that Germany, Denmark and the Netherlands would also permit the free movement of A8 EU citizens. Ultimately Germany, Denmark and the Netherlands did not permit the free movement of A8 EU citizens in 2004 and so, the number of A8 EU citizens who migrated to the UK was much higher than expected. This created the idea that it was impossible to accurately forecast the number of EU citizens who would move to the UK. Second, A8 EU citizens tended to settle in rural areas, small towns and medium cities which had little or no previous experience of immigration (D'Angelo and Kofman, 2018). This created localised challenges for local authorities (D'Angelo and Kofman, 2018; see also Cook *et al.*, 2011). Thus the free movement of EU citizens, and in particular CEE EU citizens (see D'Angelo and Kofman), to the UK became highly politicised (Balch and Balabanova, 2016; Parker, 2017) .

The structural differences between the EU member states are, arguably (see Parker, 2017; Parker, forthcoming), important in explaining the politicisation of free movement within EU member states because not only do different labour market conditions and different welfare systems result in different fiscal costs and economic tensions but they also create different perceptions of fairness (Ruhs, 2017). For example, in liberal welfare systems, provisions are often means tested (Esping-Andersen, 1990) and so, are based on need rather than prior contribution. This may raise questions about the fairness of granting provisions to newcomers (Ruhs, 2017) because it allows individuals to benefit from the social and legal systems of the member states without taking on the responsibilities of national citizenship (see Bellamy, 2019). Indeed, in British parliamentary debates both prior to and following the UK's vote to leave the EU there was a considerable preoccupation with the fiscal cost of EU free movement (Dagilytes and Greenfields, 2018).

Nevertheless, concerns about free movement were for the most part not backed up by evidence but rather were socially constructed (Parker, forthcoming; see also Parker, 2017). For example, after 2004 EU citizens were increasingly referred to as EU migrants rather than EU citizens (Bruzelius *et al.*, 2014). Furthermore, the UK Independence Party (UKIP) increasingly portrayed EU citizens as in

competition with UK citizens for supposedly scarce or limited resources (see Parker, forthcoming). UKIP's electoral success had an important impact on the narratives and policies of other political parties in the UK with the Conservative Party, for example, pledging to limit net migration to the tens of thousands in 2010 and the Labour Party pledging to end free movement in 2017 (see Parker, forthcoming). However, concerns around competition for resources were not the only supposed issues with EU citizens, in particular A2 EU citizens, increasingly being linked to criminal practices and organised crime (see Parker, forthcoming; Balch and Balabanova, 2016; Fox *et al.*, 2012). As a result, the free movement of EU citizens was not simply politicised (Balch and Balabanova, 2016; Parker, 2017) but also securitised (Parker, forthcoming).

Stereotypical representations of Roma have been central to representations of A2 EU citizens in the UK (Balch and Balabanova, 2016; Fox *et al.*, 2012). For example, the welfare chauvinism narrative was prominent in debates around free movement in the UK (Balch and Balabanova, 2016). Roma were central to this narrative with Martin, Scullion and Brown (2017: 11), for example, noting that '[t]he 'benefit tourism' discourse would have us believe that access to the welfare system in the UK is the primary motivating factor in Roma migration.' Moreover, Roma were depicted as arriving in the UK with large families, living in overcrowded and squalid conditions and as having a propensity for crime, begging and spreading disease (Guy, 2003). This discourse is important because in connecting Roma with crime and disease, the idea is propagated that welfare chauvinism would increase on account of their ill health and/or criminal activities. Finally, in recent years, these representations of Roma, Gypsy and Traveller groups have also been liberally applied to CEE EU citizens who would not consider themselves to be Roma (Fox *et al.*, 2012). This has particularly been the case for Romanian EU citizens with Fox *et al.* (2012: 688; see also Wemyss and Cassidy, 2017) noting not only that the tabloid media repeatedly conflates Roma with Romanian but also that 'attaching the Roma label to Roma conveys the stigma that has accrued to the label; attaching it to Romanians transfers that stigma to them.'

These representations of Romanian EU citizens and, in particular Roma EU citizens, as less European than other EU citizens (Fox *et al.*, 2012) have substantial implications in relation to the rights of all European citizens resident in the UK. On the 1st January 2014 – i.e. the day that restrictions to the free movement of Romanian and Bulgarian EU citizens ceased to apply - the UK government brought in a number of changes to the social rights of EU citizens resident in the UK. These changes included the introduction of a three-month residence requirement for Jobseekers Allowance (JSA), Child Benefit and Child Tax Credit; the scrapping of Housing Benefit for all EU Jobseekers; the introduction of a three-month cut off for JSA; and the introduction of both a Genuine Prospects of Work Test (GPOWT) and the MET (see Chapter 5). In response to this O'Brien (2017; see also O'Brien, 2013) has suggested that EU citizens resident in the UK were subjected to an 'activation plus regime' - i.e. a regime within which the key principles of activation – conditionality and responsabilisation – went beyond what was required of UK citizens. However, the 'activation plus regime' (O'Brien, 2013; 2017) was a double-edged sword. In the UK, migrant workers were presented not only as a threat to the welfare system but also as model neo-liberal citizens on account of their willingness to engage in low-paid and precarious forms of employment. These attributes were often used to highlight the seemingly 'work shy' nature of British citizens (O'Brien, 2013). As O'Brien (2013: 110) notes:

EU migrants can represent an epitome of autonomy - exerting life choices to migrate and find work - so prove useful models of personal responsibility, in spite of the non-comparability to non-working nationals [...] The menace messages fortify this approach - in scrapping benefits, introducing greater conditions for migrants, and restricting exportability, they reduce the protections offered to EU migrants, who can then be pointed to as even greater exercisers of autonomy. The more the 'menace' approach reduces support for EU migrants, the more those migrants become 'models' for national welfare allocation along more responsabilized lines.

Within this model-menace construct (O'Brien, 2013), Roma are the exemplar of conditional citizenship (Dagilyte and Greenfields, 2015) because not only does the 'benefit tourist' narrative imply that access to the welfare system was the primary motivation for Roma free movement to the UK (Martin, Scullion and Brown (2017: 11) but Roma are also willing to engage in any form of employment in the UK in order to bring money into the family (Dagilyte and Greenfields, 2015).

The UK then presents an interesting context for exploring the ways in which Roma EU citizens experienced EU citizenship for four key reasons. First, the UK is home to a substantial Roma population. Second, the free movement of CEE EU citizens to the UK was politicised. Third, representations of Roma EU citizens have been key to the politicisation of free movement in the UK. Fourth, the politicisation of free movement in the UK has resulted in the rights of EU citizens and British citizens being rescinded at the member state level.

The empirical research undertaken for this PhD project took place between October 2017 and October 2018 (see Chapter 2). A number of changes have taken place since the empirical research was completed (see Conclusion) with the most significant being the UK's withdrawal from the EU. In response to the electoral success of UKIP and growing internal divisions within the Conservative Party the then Prime Minister, David Cameron, promised that if the Conservative Party won an overall majority in the 2015 general election, he would renegotiate the UK's terms of membership with the EU following an 'in or out' referendum. At the time that David Cameron promised the referendum on EU membership, it was considered unlikely that the Conservative Party would win the 2015 general election (D'Angelo and Kofman, 2018). However, the Conservatives did win the election and so the referendum on the UK's membership of the EU took place on the 23rd of June, 2016. Much of the debate in the run up to the UK's referendum on EU membership was centred on the impact of EU migrants on the UK economy with there being considerable discussion about the impact of large scale EU migration on jobs and wages, in particular for those at the bottom end of the paid labour market (D'Angelo and Kofman, 2018). There was also considerable discussion of

welfare chauvinism in these debates with a poll undertaken in 2015 finding that 60% of respondents thought that free movement should be restricted due to pressure on public services and that migrants were largely coming to claim benefits (D'Angelo and Kofman, 2018). As such, access to benefits became the cornerstone of the New Settlement Agreement with the European Council. This agreement included an 'emergency break' which would have allowed the UK government to impose a waiting period of up to 4 years before EU citizens could access non-contributory benefits in the UK. The New Settlement Agreement did not come into force because on the 23rd of June 2016 the UK voted to leave the EU and, unsurprisingly, the changes following the UK's withdrawal from the EU look likely to have further undermined the rights of EU citizens resident in the UK (see Conclusion). The implications of my research in relation to the UK's withdrawal from the EU are reflected upon in the concluding chapter of this PhD thesis.

Section 6: Why Roma EU Citizens in England and Scotland?

Of the EU15 member states, economic tensions and concerns about fairness were likely to be greatest in the UK and Ireland because these were the two EU member states with relatively flexible labour markets and relatively non-contributory welfare systems (Ruhs, 2017). However, the extent to which the combination of a relatively flexible labour market and a relatively non-contributory welfare system will result in policy preference on reforming free movement rules also depends on how the national interest is defined (Ruhs, 2017; see also Parker, 2017; Parker, forthcoming). As Ruhs (2017: 33-34) notes:

because the Irish are more likely than the British to evaluate the consequences of free movement in terms of its impacts on all EU citizens, Ireland is less likely than the UK to consider the employment of relatively large numbers of EU workers in low waged jobs with immediate access to non-contributory benefits as a reason for calling for policy change.

Brexit can, in many ways, be seen to have resulted from the increasing politicisation of EU free movement in the UK. At the national level, however, voting preferences differed with 55.8% of voters in Northern Ireland and 66% of voters in Scotland casting their vote in favour of remaining in the EU (BBC, 2016). The differences in how voters in Scotland perceived the EU can be understood in relation to the definition of the national interest because Scotland has historically had difficulties in attracting its share of the migrant population (de Lima and Wright, 2009).

The way in which migration is framed in Scotland differs from the way that it is framed in both the rest of the UK and Europe (Hepburn and Rosie, 2014) with the rhetoric in Scotland having been based in particular on the settlement of economic migrants. In contrast, in the rest of the UK, especially in the South of England, the focus was increasingly on forms of circular migration with rights to permanent residence becoming more restricted (Shaw, 2009). However, powers over migration policy are reserved to the UK government under the Scotland Act 1998. As de Lima and Wright (2009: 391) argue: '[t]he crux of the issue is that Scotland has historically been a country of net emigration, with a declining population that has been identified as the single biggest challenge to policy makers, whereas England has long been a country of net immigration that serves as the primary reference point for the design of common UK immigration law.' Notwithstanding devolution in a number of areas then, and different policy needs on migration, EU citizens' residence rights remain a so-called reserved matter (controlled by Westminster) (see Chapter 5).

It is nonetheless significant that there are also differences in the paid labour markets in Scotland and England. For example, a distinguishing feature of Scotland's labour market is presented by the patterns of settlement with one fifth of the population of Scotland residing in the central belt (Bertram and Wright, 2012). This concentration of the host population in urban areas, alongside high levels of youth out-migration and low levels of unemployment in some rural areas of Scotland, opened up space for substantial labour migration into rural communities in Scotland (de Lima and

Wright, 2009). Thus the need for migrant labour in Scotland has been central to the SNP led government's positive migration narrative (Pietka-Nykaza, Leith and Clark, 2020).

Moreover, devolution may have also opened space for divergence in areas that are formally reserved matters (Mulvey, 2018). For example, although the UK has centralised both unemployment benefits and labour market policy, the devolved administration has authority over related issues such as training and education. As such, Scotland has developed its own employability programmes with Fair Start Scotland, for example, providing voluntary employment support services to help people living in Scotland find work (Scottish Government, 2019). Helms and Cumbers (2006) have therefore suggested that while employment policy is made at the member state level, given that it was adapted to specific local and historical contexts, Scotland could have been seen as having its own distinct labour market policy.

There are also differences in relation to the generosity of provisions that EU citizens could claim in Scotland. For example, Scotland offers more generous provision than the rest of the UK for student support, elderly care and health care (Painter, 2008). In addition, in 2012, the Westminster government brought in the UK's Welfare Reform Act which abolished the discretionary social fund, community care grants and crisis loans and introduced an under-occupancy penalty (the so-called 'Bedroom Tax') for social housing tenants who were in receipt of Housing Benefit and a Benefits Cap for those claiming Housing Benefit or Universal Credit (UC). The Scottish parliament sought to mitigate the impacts of the UK's Welfare Reform Act 2012 by offering discretionary crisis and community care grants and discretionary housing payments to social tenants subject to this 'bedroom tax'. As such, EU citizens resident in Scotland were, in certain circumstances, able to access more generous provisions than if they had been resident in England, Wales and/or Northern Ireland.

Finally, the political environment may have had an impact on EU citizens' ability to exercise their rights. For example, Dwyer *et al.* (2019) have highlighted how conditionality operating at three levels (the EU level, the member state level and the 'mundane street level' - i.e. encounters with social

security administrators) came together to restrict the social rights of EU citizens living in the UK. As such, street level bureaucrats could be seen to mould and shape the law through their own interpretations of it (Lipsky, 2010). These processes were not neutral but were structured by the rules and programmes that bureaucrats implemented as well as their individual backgrounds and experience (Lipsky, 2010). The different political environments, and in particular the differential narratives in relation to EU free movement in England and Scotland (see Pietka-Nykaza, Leith and Clark, 2020), may have meant that the law was moulded and shaped differently at the local level.

As Maas (2013a: 109) argues, 'even in unitary states, local or regional authorities may develop administrative practices which discriminate between residents of one part and another part of the overarching jurisdiction.' The rights of mobile EU citizens can then be seen to be contested and contingent (Parker and López Catalán, 2014). Differences in the discourses of EU free movement in Scotland and England (Pietka-Nykaza, Leith and Clark, 2020) as well as differences in the paid labour markets and welfare systems at the national level may have had substantial implications for the ways in which Roma EU citizens experienced their EU citizenship status in their everyday lives.

Section 7: Why Roma EU Citizens in Sheffield and Glasgow?

In opting to explore Roma experiences in two cities we are able to gain an understanding of the ways in which the rights of EU citizens could be granted or withheld at the local level. Sheffield and Glasgow are similar in that both had the same legal frameworks in relation to the rights of mobile EU citizens. Roma migration to both cities also began before the 2004 EU enlargement when a small number of Slovakian and Czech refugees and asylum seekers were housed in each city (Migration Yorkshire, 2018a; Social Marketing Gateway, 2013). Migration to these cities subsequently increased following the 'big bang' enlargement (Migration Yorkshire, 2018a; Social Marketing Gateway, 2013).

As a result, both cities house approximately 3-4,000 Roma EU citizens (Social Marketing Gateway, 2013²; Migration Yorkshire, 2018a).

However, there are of course also key differences between the two cities. First, as noted in the previous section, EU free movement was not politicised in Scotland in the same way that it was in England. As such, the selection of Sheffield and Glasgow allows for an exploration of how the legal framework of EU citizenship was interpreted at the national (meaning English and Scottish) level and the effects of such interpretations for Roma in both cities.

Second, there are differences in the paid labour markets in Scotland and England which may result in differing needs for low paid labour at the local level (see Chapter 3). For example, Scott and Brindley's (2012) research found that Scotland had experienced a 125% increase in net EU migration between 2001 and 2010, while Yorkshire and the Humber had only experienced a 79% increase in the same period. This implies that, when compared to Sheffield, there may have been more labour market opportunities available to EU citizens resident in Scotland. However, if Roma experienced the paid labour market differently at the local level (see Chapter 4) then they would have had different welfare needs at the local level and so, were likely to be claiming different types of social benefits (see Chapter 6). For example, EU citizens resident in the UK could access benefits during times of both employment and unemployment (see Chapter 5). However, the types of benefits that Roma could access and their conditions of access differed depending on whether the claimant was engaged in employment, had previously been engaged in employment or had never been or was unable to document that they had previously been engaged in employment in the UK (see Chapter 5). Further differential treatment could also be found at the local level with Scotland, for example, having authority over issues such as training and education (see previous section) and the Localism Act 2011 giving local authorities in England the powers to 'promote economic growth' (Communities and Local Government, 2011: 6). Accordingly, the ways in which Roma EU citizens experienced welfare

² This data is not methodologically robust. However, public and voluntary sector organisations in Glasgow regarded these numbers to be reliable and credible (Clark, 2014a).

conditionality - i.e. the principle that eligibility to certain basic, publicly provided welfare entitlements should be dependent on an individual first agreeing to meet particular duties or patterns of behaviour (Deacon, 1994) - may have differed at the local level (see Chapter 4).

Third, there are differences in the quality of services that Roma could access at the local level with research (Migration Yorkshire, 2018b) finding that services in Sheffield tended to be uncoordinated: there were gaps in the knowledge of many staff working in statutory services and those same services failed to adapt quickly to changes in the Roma community. In contrast, Govanhill in Glasgow (alongside Redbridge in London and Normanton and Arboretum in Derby), was identified as an example of 'high quality integration work and service provision involving Roma communities' because provisions were coordinated, mainstream services were adapted and frontline staff had the cultural understanding and skills needed to support Roma (Morris, 2016: 13). As such, Roma EU citizens would have had differing experiences of engaging with local services in Sheffield and Glasgow (see Chapter 4).

Finally, the populations in Sheffield and Glasgow differed with the Roma community in Sheffield being predominantly Slovak (Migration Yorkshire, 2018a) and the Roma population in Glasgow consisting of both Slovak and Romanian Roma (FRA, 2015; Community Infosource, 2016). The selection of Sheffield and Glasgow as research sites thus allows for a consideration of not only the different and multifaceted ways in which similar groups of Roma (i.e. Slovak Roma) experienced their status as EU citizens, but also how different Roma populations (i.e. Slovak and Romanian Roma) experienced their EU citizenship status in the UK.

In conclusion, by selecting Sheffield and Glasgow as research sites we are able to explore whether the legal framework of EU citizenship was interpreted similarly or differently at the national level; the impact of differing labour markets on EU citizens' access to their social rights; and the impact of different governance structures at the city-level on the rights of EU citizens. We are also able to compare both how similar Roma populations' experiences of their EU citizenship status differ at the

local level, and how different Roma populations experience their EU citizenship status at the member state level and supra-national levels.

Section 8: Research Questions

The above discussion has highlighted not only the manner in which EU citizenship presented both opportunities and constraints for migrant Roma but also the ways in which differing interpretations of the legal framework of EU citizens, differing labour market opportunities and differing governance structures may have had an impact on the way in which Roma EU citizens experienced their EU citizenship status in the UK. Therefore, my research questions are as follows:

Central Research Question: How was multi-level citizenship experienced by migrant Roma in the UK?

Sub-Questions:

1. What opportunities did multi-level citizenship offer to migrant Roma in the UK?
2. What constraints did multi-level citizenship impose on migrant Roma in the UK?
3. How were the opportunities and constraints of multi-level EU citizenship experienced similarly or differently by migrant Roma in Sheffield and Glasgow?

Section 9: Literature Review and Contributions

Much of the literature on Roma has focused on the inclusion/exclusion of Roma at the local (Poole and Adamson, 2008; Poole, 2010; Leggio, 2019), UK (Craig, 2011; Brown, Martin and Scullion, 2013; Brown *et al.*, 2014; Morris, 2016) and European levels (Vermeersch, 2002; Guy, 2009; Sigona and Vermeersch, 2012, Vermeersch, 2012; Brown, Dwyer and Scullion, 2013; Goodwin and Burjjs, 2013; Martin, Scullion and Brown, 2018; Magazzini *et al.*, 2019). This literature has, however, been largely focused on the impact that various inclusion policies have had on Roma EU citizens and so, has not directly engaged with Roma EU citizens' experiences of EU citizenship.

Similarly, there is a small body of literature that has focused on the racialised production of Roma at the local (Mullen, 2018), UK (Nagy, 2016a; 2018) and the EU levels (Van Baar, 2012; 2018; see also Kóczé, 2018). For example, Mullen (2018) analyses how place-based racialisation has resulted in problems such as overcrowding and poverty in the Govanhill area of Glasgow being often exclusively attributed to Roma and presented as a 'Roma problem.' As Mullen (2018: 221) notes:

Through a process of territorial stigmatisation over time, Roma have thus been through distinctly place-based constructions, while Govanhill has been constructed as a problem place through its association with Roma, such that it has become possible to evoke the 'Roma problem' locally without naming Roma at all.

Similarly, Nagy's (2016a; see also Nagy, 2018; 2019) multi-sited ethnographic research explored the mechanism through which Roma were sorted into productive newcomers and 'benefit tourists' in the UK and the coping strategies enacted by Roma in response to these surveillance techniques, finding that the objectivity and efficiency of digitalised surveillance systems were overestimated. And finally, Van Baar has analysed how neo-liberal structures have created and normalised the exclusion of Roma both within their countries of origin (Van Baar, 2012) and within Europe more generally (Van Baar, 2018). These works (Mullen, 2018, Nagy, 2016a; 2018; Van Baar, 2012; 2018; see also Kóczé, 2018) are therefore important contributions with Nagy's (2016a; 2018: see also Nagy, 2019) work in particular not only having highlighted some of the constraints that Roma may experience when they attempt to access social provisions in the UK but also some of the economic coping strategies that they may enact. However, this body of literature has not directly engaged with the question of opportunities and constraints for Roma as EU citizens.

A small proportion of the work on migrant Roma in the UK has focused on the construction of Roma at the local (Richardson, 2014) and UK level (Leggio, 2017; Richardson and Codona, 2018). For example, Leggio's (2017) work examined narratives on Roma in the build up to the UK referendum on EU membership and found that images of migrant Roma were not only central to reshaping debates

around the impact of migration on the welfare system but also on the need to reform the welfare system in order to reduce migrants' access to it. Similarly, Richardson's (2014) work examined the media and political discourse surrounding the Roma population in the Page Hall area in Sheffield in the 2013/2014 period and found that negative political and media discourse had had a negative impact not just on the Roma in the area but also on the larger community. Consequently, Richardson (2014) called for academics, community groups and Roma activists to challenge negative narratives about Roma communities. This call has been taken up within the academic literature with a small number of studies seeking to counter negative narratives about Roma in the UK. For example, Clark (2014a; see also Clark, 2017) examines the experiences of Slovak and Romanian Roma communities who are living in the Govanhill area of Glasgow and suggests that despite the negative narratives, the issues that migrant Roma experience are not dissimilar to the issues faced by other migrant groups. Similarly, Martin *et al.*'s (2017) work examined the reasons why Roma EU citizens engage in free movement and found that Roma free movement was primarily linked to a lack of labour market access in their countries of origin and the relative ease of finding employment in the UK rather than access to the welfare system. These studies (Clark, 2014a; 2014; Martin *et al.*, 2017) are important in that they have not only focused on or included the Roma population in Glasgow but they have also highlighted some of the opportunities and constraints presented to Roma by EU citizenship. However, while this thesis utilises and builds on this work, the focus is on the opportunities and constraints that multi-level citizenship afforded Roma EU citizens in Sheffield and Glasgow.

Similarly, a significant proportion of the literature on Roma in the UK has focused on Roma EU citizens' access to social entitlements. For example, Paterson *et al.* (2011) examined the impact of the 2011 changes to the rules determining A8 Roma migrants' ability to access welfare benefits and public funds in Glasgow and found that administrative delays, inefficiencies, barriers and inequality were endemic within the public authorities (HMRC, DWP and Glasgow City Council) charged with administering those benefits. However, their research (Paterson *et al.*, 2011) did not include Roma respondents and took place prior to the 2014 changes. Therefore, while they provided important

insights, they did not present the perspectives of Roma themselves post-2014. In contrast, Dinu and Scullion's (2019) research not only included Roma respondents but was also conducted post-2014. Their research (Dinu and Scullion, 2019) focused on Roma EU citizens' experiences of the increasingly conditional social security regime in the UK and found not only that Roma EU citizens experienced considerable barriers when they attempted to access social security entitlements in the UK, but also that some Roma were considering whether to exit from the UK social security system as a result. However, while this study (Dinu and Scullion, 2019) provided important insights into both Roma EU citizens' experiences when they attempted to access welfare benefits in the UK and the economic coping strategies that Roma may enacted in response, it did not directly engage with the legal framework of EU citizenship (see Chapter 5).

Humphris's (2019) ethnographic work with Romanian Roma families in Luton (UK) emphasised the ways in which rights could be granted or denied in 'intimate state encounters' between frontline workers and Romanian Roma mothers. As such, Humphris's (2019) research is significant in that it highlighted not only the importance of the local level, and in particular the relationships between frontline workers and Roma, in the acquisition of rights but also the intersection between the legal framework of EU citizenship and the Children's Act 1989. Humphris (2019) found that a failure to meet the conditions outlined in Section 2 of this chapter left mobile Roma EU citizens with a choice between destitution in the UK (and the possibility of their children being taken into care) or further free movement. However, Humphris's (2019) research was focused on a single city and conducted prior to the 2014 changes to the social rights of EU citizens resident in the UK. As such, there is a need to not only update the existing literature but also consider how Roma EU citizens' experiences may differ at the local level.

To some extent, Dagilytes and Greenfields' (2015; Greenfields and Dagilytes, 2018) exploratory research can be seen to have updated the pre-2014 work of Humphris (published in 2019) in that it focused on the experiences of Roma EU citizens and their families when claiming Income Based JSA

and Housing Benefit in two English cities. This focus on Roma families resulted in Dagilytes and Greenfields engaging directly with the legal framework of EU citizenship. In particular, they explored the conditions that EU citizens needed to meet in order to demonstrate that they were legally resident in the UK and found that it was extremely difficult to find definitive guidance. As such, they suggest that considerable numbers of Roma applicants chose to cease their claim for social provisions in the belief that they would not be able to provide the necessary documentation thus waiving their rights as EU citizens on account of the administrative burden (Dagilytes and Greenfields 2015: 483). However, while their research included two case studies, it did not explicitly consider how the constraints inherent in the EU's legal framework were experienced similarly or differently by migrant Roma at the local level.

Finally, much of the literature that has engaged with the question of opportunities and constraints for Roma as EU citizens in Europe has focused on the removal of Roma from France and Italy (Aradua, 2009; van Baar, 2011; Parker, 2012; Carrera, 2014). This literature has contributed to understandings of how Roma EU citizens experience their EU citizenship status in that it has highlighted both the ways in which Roma mobility has been 'irregularised' (Squire, 2011) and also the inherent tendency within multi-level governance to exclude Roma EU citizens. The importance of the municipal level has, however, been largely ignored within the literature that has engaged with the question of Roma as EU citizens at the European level. That said, there are a small number of exceptions. For example, Baracsi's (2018) research analysed the interplay between multi-level policies in Naples and subsequently the ways in which Roma shape their economic strategies. However, while Baracsi does engage with the EU level, she was primarily concerned with the 'Roma agenda', or in other words, European policies aimed at Roma inclusion, and so, her work does not engage with the legal framework on EU citizenship. In contrast, as noted in Section 4, Parker and López Catalán's study (2014) of the lived experiences of Roma EU citizens in France and Spain found that despite the more permissive legal framework in Spain, the rights of mobile Roma EU citizens were nevertheless being withheld at the local level in Barcelona. However, their study explored the

lived experiences of Roma EU citizens in two EU member states and so did not seek to understand the ways in which the opportunities and constraints inherent to multi-level EU citizenship may differ *within* a single EU member state.

In relation to the extant literature, this research therefore makes three primary contributions. First, it adds to the very limited research on the opportunities and constraints for mobile Roma EU citizens in the EU (Aradua, 2009; Van Baar, 2011; Parker, 2012; Carrera, 2014). Second, it builds on the limited literature that has engaged with the question of opportunities and constraints for Roma as mobile EU citizens in the UK (Paterson *et al.*, 2011; Clark, 2014a; 2017; Nagy, 2016a; Martin *et al.*, 2017; Dinu and Scullion, 2019; Humphris, 2019) and in particular the literature on the impact of the 2014 changes for Roma families (Dagilyte and Greenfields, 2015; Greenfields and Dagilyte, 2018). And finally, it provides an illustration of the concept of multi-level citizenship (Maas, 2007; 2013b; Faist, 2001) in practice (explored further in Chapter 2), with reference to both a vulnerable group and the municipal level and so, builds on Parker and López Catalán's (2014) work on the contingent nature of post-national citizenship.

Section 10: Chapter Outline

As outlined in the introduction to this chapter, the legal and policy framework of EU citizenship presents both opportunities and constraints for mobile Roma EU citizens. In addition, the methodological approach taken in the thesis also proposes both a 'top-down' approach - i.e. presenting an overview of the legal and policy frameworks at the EU, UK, national and local levels that may or not create opportunities and constraints for Roma in Sheffield and Glasgow - and a 'bottom-up' approach - i.e. a presentation of Roma EU citizens' experiences of the opportunities and constraints inherent in the multi-level framework of EU citizenship (see Chapter 2). These conceptual divisions – 'opportunities' versus 'constraints' and 'top-down' versus 'bottom-up' – inform the structure of the thesis.

Chapter 2 is concerned with the methodology used to conduct the research and so outlines the 'top-down' and 'bottom-up' methodological approach, the methods used to generate data and the key strengths and limitations of the research.

In Chapter 3, a 'top-down' approach is adopted in order to explore the opportunities that may have been created for migrant Roma resident in the UK by multi-level citizenship. Thus Chapter 3 explores the push that may have contributed to Roma EU citizens' decision to engage in free movement and the pull factors that may have drawn them to the UK. A central consideration in this chapter is the labour market conditions in the UK with the key argument being that the combination of the UK's liberal market economy and liberal welfare system may have meant that Roma EU citizens could access economic opportunities as EU workers post-2004. Nevertheless, the chapter goes beyond this argument in that it emphasises not only the ways in which Roma EU citizens' experiences of the opportunities presented by EU citizenship may have changed over time but also differed in accordance with their residence in either Sheffield or Glasgow.

In contrast, Chapter 4 adopts a 'bottom-up' approach in order to understand the similarities and differences in the ways in which migrant Roma experience the opportunities created by multi-level citizenship in both Sheffield and Glasgow. In doing so, it confirms that the combination of the UK's liberal market economy and liberal welfare system was an important factor for Roma respondents. However, the experiences of Roma EU citizens in Sheffield and Glasgow not only differed at the local level, but also changed as result of the 2008 financial crisis.

In Chapter 5, the constraints inherent in the legal and policy frameworks at the EU and UK levels are explored from the 'top-down' with the aim of highlighting the constraints that multi-level citizenship may impose on migrant Roma in the UK. A key consideration is the increasingly restrictive framework at the EU and UK levels. Thus the chapter maps both the changing legal framework at the supra-national level and the ways in which this was implemented at the UK level and suggests that the post-2014 changes in the UK may go beyond what is permissible in EU law. With reference to the

existing literature on Roma experiences of the welfare system in the UK (in particular, Nagy, 2016a; Dagilyte and Greenfields, 2015; Dinu and Scullion, 2019), the chapter proceeds to outline the constraints that multi-level citizenship may have imposed on the everyday lives of Roma EU citizens in the UK and notes that the existing post-2014 literature (Dagilyte and Greenfields, 2015; Dinu and Scullion, 2019) has not considered the ways in which Roma EU citizens experienced the constraints inherent in multi-level citizenship as EU workers.

Finally, in Chapter 6, the similarities and differences in the ways in which migrant Roma experience (i.e. the bottom-up perspective) the constraints of multi-level citizenship in Sheffield and Glasgow are analysed. Thus, Chapter 6 not only confirms some of the findings in the existing post-2014 literature (Dagilyte and Greenfields, 2015) but also analyses Roma EU citizens' experiences when they attempted to access social provisions as EU workers. Moreover, and in line with the multi-level citizenship (Maas, 2007; 2013b; Faist, 2001) approach adopted in this PhD thesis, this chapter highlights not only the differences in Roma EU citizens' experiences of the constraints inherent in multi-level citizenship in Sheffield and Glasgow but also the different economic strategies employed by Roma, in these locales, in response to the 2014 changes.

Having analysed the opportunities and constraints that multi-level citizenship offered and imposed on Roma EU citizens from both the 'top-down' and the 'bottom-up', the concluding chapter reflects on the ways in which multi-level citizenship was experienced by migrant Roma in the UK, outlines the implications that the research has for Roma in Europe, the contributions that the research has made to the existing literature, as well as outlining the Post-Brexit context and possible implications for Roma EU citizens and so, not only the continued relevance of this research but also the need for further research moving forward.

Chapter 2: Methodology

Having outlined the reasons for conducting this project, the research questions posed and the key contributions that the research makes in the previous chapter (see Chapter 1), this chapter outlines the methodology used to conduct the research. The primary aim when choosing a research strategy is to achieve the best procedure for answering the research questions (Blaikie, 2010: 107). As such, the abductive research strategy (Blaikie, 2007; 2010) was selected for this research project because it was able to answer what and how questions pertaining to the experiences of Roma migrants in the UK (see Blaikie, 2010: 105) (see Chapter 1).

The abductive research strategy includes what deductive and inductive research strategies can often ignore - the meanings and interpretations that people use in their everyday lives - and elevates them to the central place in social science (Blaikie, 2010: 89). The researcher's task then, is to discover and describe the 'insider' view. However, the abductive research strategy (Blaikie, 2007; 2010) goes beyond these lay descriptions of social life: the fundamental aim of the abductive research strategy is to construct theories from social actors' language, meanings and accounts of their everyday activities.

The abductive research strategy can be seen to be based on an idealist ontology (i.e. the view that the external world consists of representations that are creations of individual minds (see Blaikie, 2007: 16-17) and constructivist epistemology (i.e. the view that knowledge is the outcome of people having to make sense of their encounters with the physical world and with other people) (see Blaikie, 2007: 22-23). However, the extent to which a researcher opts to extract social scientific categories and concepts from lay descriptions of social life remains fundamentally linked to the ontological and epistemological position of the researcher in question. To this end, Blaikie (2010; see also Blaikie, 2007) has suggested that understandings obtained in the abductive research strategy can be further refined and elaborated through the inclusion of other social actors in the same context and/or the inclusion of more than one research site. As such, two sets of research participants in two research

locales were included in this PhD project so as to develop an understanding of the underlying structures of EU citizenship and then, tentatively, explain why Roma EU citizens' experiences of their EU citizenship status may have differed at the local level. The abductive research was particularly useful in this regard because its ability to deal with specific experiences in context allowed for an exploration of multi-level citizenship in practice (see Chapter 1).

The chapter proceeds as follows. In section 1, the methodological approach that underpinned the research is presented. In section 2, the ways in which data was generated are explored. And finally, in section 3, the key strengths and limitations of the research are outlined. The chapter concludes by reiterating some of the key points raised.

Section 1: Methodological Approach

The project adopts a social realist approach (see Blaikie, 2007: 145-151) in order to understand the opportunities and constraints created for migrant EU Roma, resident in the UK, by the multi-level framework of EU Citizenship. Within the social realist tradition (Blaikie, 2007), structure and agency are conceptualised as ontologically separate with the relationship between structure and agency being viewed as dialectical. The benefits of this theoretical position are three-fold. First, in viewing structure and agency as ontologically separate, both are seen as influencing the other. Second, structure is seen to both facilitate and constrain agents who, in acting, change structures which, in turn, constrain or facilitate different types of agency. Third, social realism implies that structures of which agents may not be aware can have an effect on agents (see Marsh, 2010).

This theoretical position lends itself to an abductive research strategy (Blaikie, 2007). Abduction refers "*to the process of moving from lay descriptions of social life to technical descriptions of social life*" (Blaikie, 2007: 91 - emphasis in the original). Within the abductive research strategy the aim of the researcher is to uncover the mutual knowledge, symbolic meanings, intentions and rules that provide direction to the everyday lives of the research participants and subsequently to develop

social scientific concepts and theories from these lay accounts. Blaikie (2007: 90 – emphasis in the original) summarises the layers in the abductive research strategy as follows:

*Everyday concepts and meaning
provide the basis for
social action/interaction
about which
social actors can give accounts
from which
social scientific descriptions can be made
from which
social theories can be generated
or which can be understood in terms of existing
social theories or perspectives*

In line with social realist methodology the abductive research strategy moves beyond a ‘bottom-up’ analysis of interview data in order to include reference to ‘top-down’ structures and processes of which social actors may be unaware (Blaikie, 2010: 102-103). This is important in relation to both the overall aim of the PhD project and the research questions posed (see Chapter 1). As noted in Chapter 1, a key aim of this PhD thesis is to provide an illustration of the concept of multi-level citizenship (Maas, 2007; 2013b; see also Faist, 2001) in practice *within* an EU member state. The abductive research strategy permits this, with its focus on both broader economic, legal and local bureaucratic structures (‘top-down’) *and* Roma EU citizens’ everyday lived experiences (‘bottom-up’), allowing for an exploration of the realities of multi-level citizenship.

Section 2: Data Generation

The methodological approach taken within this thesis develops theory, data generation and data analysis simultaneously and in a dialectical and iterative fashion in order to develop a model of the underlying structures of EU citizenship and then understand how these mechanisms relate to Roma EU citizens’ experiences of their EU citizenship status at the local, national, member state and

supra-national levels. There were three systematically linked phases of data generation within this project.

Phase 1: Mapping the Frameworks of EU Citizenship at the EU and UK Levels

A systematic mapping of the contemporary legal and policy structures at the supra-national EU and UK level was undertaken and analysed in line with the understanding of EU citizenship as multi-levelled. This involved a review of literature available in relation to the rights of EU citizens in Europe and the UK and the experiences of Roma EU citizens in particular. As such, a number of appropriate keywords or phrases were identified (EU citizens; European citizens; Roma EU citizens; European Roma; Roma EU citizens' experiences; EU citizens' experiences; EU citizens' social rights; EU citizens' legal rights; EU citizens in the UK; Roma EU citizens in the UK etc.). These were then used as a means to search for relevant material via generic academic databases (Google Scholar; ProQuest; Scopus etc.) and subject-specific databases (Social Policy and Practice; Sociological Abstracts; Applied Social Sciences Index and Abstracts etc). The insights and understandings developed in Phase 1 were then used to explore how these structures may or may not relate to Roma EU citizens' experiences in the subsequent fieldwork sites of Sheffield and Glasgow (Phase Two). As such, the empirical findings from this study are organically connected to the wider literature and findings of previous research, with the prior theoretical concepts and models suggesting patterns and order in the emerging data (Layder, 1998).

Phase 2: Carrying out two Sets of Qualitative Semi-Structured Interviews with Migrant EU Roma and Key Informants in Sheffield and Glasgow.

Empirical data was collected through the use of semi-structured interviews in two research locales. Purposive sampling (Mason, 2018; Lewis *et al.*, 2014) in combination with snowball sampling (Coleman, 1958; Lewis *et al.*, 2014), was used to recruit participants.

A brief comment on the funding which facilitated this project is also necessary for its impact on the collection of data. The research project was funded through the Economic and Social Research Councils White Rose Network on European Citizenship and Free Movement. The White Rose Network on European Citizenship and Free Movement consisted of academics at three universities (The University of Sheffield, University of Leeds and University of York) and a number of organisations working with EU citizens (Migration Yorkshire, The AIRE Centre and Citizens Advice). As such, in the first instance access to research participants was sought through the White Rose Network on European Citizenship and Free Movement.

However, as the research progressed, participants were also sought through a range of local organisations. Local level contacts were developed through a range of activities including participation in Roma events and voluntary work with local organisations in both Sheffield and Glasgow. Key policy stakeholder participants were selected based on the work that they were undertaking with Roma communities in either Sheffield or Glasgow. Roma participants were selected based on their self-identification as Roma who had migrated from other EU member states to the UK, their EU citizenship status, and their residence in either Sheffield or Glasgow.

All interviews took place between October 2017 and October 2018. In accordance with the University of Sheffield's Ethics Policy and ESRC's Framework for Research Ethics, all fieldwork was governed by the principles of informed consent and anonymity. Before each interview, research participants were provided with an information sheet, given the opportunity to ask questions and were made aware of their right to withdraw from the project at any time. Written consent forms were used to reiterate understandings of consent. Interpreters and translated material were made available as required. Interviews were conducted in places that were convenient for participants: these included workplaces, municipal buildings, cafés and participants' homes. All interviews were conducted face to face. Roma participants were required to complete a short demographic questionnaire in addition to the interview. All Roma participants received a £20 Love to Shop gift

card after each interview as an acknowledgement of their time. Appropriate anonymised code numbers and agreed identifiers (where appropriate) were assigned to each interview and subsequently, each transcript.

A separate question guide was prepared for Roma and Key Policy Stakeholder Respondents, but the question guides remained linked through the interview themes (free movement, paid labour markets, social rights and Brexit). As the interviews took place after the referendum on the UK's membership of the EU but before the UK left the EU, research participants were asked to reflect on their feelings about Brexit. Due to the timings of the interviews, the interview data did not, however, capture Roma EU citizens' experiences of applying to the EU Settlement Scheme and/or their experiences of Brexit (see Conclusion). The duration of each interview was dependent upon the participants' engagement with the interview questions and ranged from 20 minutes to 2 hours, taking on average one hour.

Roma Interviews: Fifteen interviews were conducted with Roma EU citizens in each locale (30 interviews in total).³ All migrant Roma EU participants had migrated to the UK post-2004, self-identified as Roma and were aged between 19 to 55 years old. The sample included 1 Czech Roma, 21 Slovak Roma and 8 Romanian Roma and consisted of 11 men and 19 women (30 interviews in total). In Sheffield the sample includes a total of 13 Slovak Roma, 1 Czech Roma and 1 Romanian Roma respondent. In Glasgow the sample included 8 Slovak Roma and 7 Romanian Roma respondents (See Appendix Table 1: Roma Respondents).

Key Policy Stakeholder Interviews: A second set of interviews was conducted with key policy stakeholders, civil servants and practitioners working with Roma at UK, national (England and Scotland) and local (Sheffield and Glasgow) levels. Fifteen interviews were conducted in each locale

³ A total of 31 interviews were carried out with Roma participants during the project. However, it became apparent after one interview with a Roma participant that the individual may not have been able to give informed consent. Consequently, this interview has been excluded from the data set on ethical grounds.

(30 in total). Participants were drawn from a range of organisations including Citizens Advice, DWP, Universities, Local Government, Non-Governmental Organisations (NGOs) and Charity Organisations. (see Appendix Table 2: Key Policy Stakeholder Respondents).

Phase 3: Analysis of Data

Documents: The documents extracted via the academic database searches (see Phase 1) were analysed using a thematic analysis (Mason, 2018) in order to identify structures that may or may not have impacted Roma EU citizens' experiences at the national and local level. Thematic analysis refers to the extraction of key themes from a data set (Bryman, 2016: 697). As such, all of the material that was to be analysed was read through in order to ensure that I developed a familiarity with the data (see Mason, 2018; Ritchie *et al.*, 2014; Bryman, 2016). The data set was then entered into the QRS NVivo database. Open coding (Bryman, 2016) was then used in order to develop thematic codes from the data before the themes that emerged from the initial thematic analysis were refined in relation to the research questions.

Interview Data: All research interviews were audio recorded, fully transcribed and then analysed using a thematic analysis (Mason, 2018). An iterative approach underpinned the data analysis in this phase. All interview data was formatted for entry into the QRS NVivo database. The NVivo software was used in the first instance to cross-section (Mason, 2018) the data according to the interview themes (free movement, paid labour markets, social rights and Brexit). This not only allowed systematic overview of the scope of the data but also permitted the creation of theoretically informed analytical mechanisms which were then applied across the whole data set and used as a means of searching for and retrieving interview extracts in accordance with the main themes and sub-themes of the project.

However, the project is also responsive to the order suggested by the data itself (Layder, 1998). In the second and third rounds of coding, a non-cross-sectional method was adopted in order to develop

thematic codes that would support analysis that involves explaining phenomena in context (Mason, 2018; Ritchie *et al.*, 2014). This combination of cross sectional and non-cross-sectional coding enabled a systematic comparison of different participants' views and experiences in relation to the main themes and sub-themes across the whole data set. This combination simultaneously allowed themes that were specific to particular cases to be identified (Ritchie *et al.*, 2014) with the aim of building explanations based on the alternative ways of slicing the data (see Mason, 2018: 187-218).

Finally, having established the main themes and sub-themes, an NVivo software package was used to construct three case nodes (Sheffield and Glasgow; Roma Respondents; Key Policy Stakeholder Respondents). Relevant interview transcripts were then assigned to each node and then cross categorised according to specific categorical values. This approach served as a valuable tool for comparing the main themes and sub-themes across and between the cases, while also permitting comparisons to be made across and between sub-groups (see Bazeley and Jackson, 2013: 122-153). Accordingly, the abductive research strategy (Blaikie, 2010) was central to the analysis of interview data with the NVivo software permitting comparisons across and between the data sets (Roma Respondents and Key Policy Stakeholder Respondents) and across and between the research sites (Sheffield and Glasgow).

Section 3: Strengths and Limitations

Having outlined the methodological approach taken and the ways in which data was generated, this section will highlight the key strengths and limitations of the research. Within the social realist approach, the purpose of comparative research is not to look for universal laws in empirical data but rather to identify the mechanisms that function within specific research locales and then to develop an understanding of why these mechanisms are present in some cases but not others (see Bergene, 2007; Easton, 2010). Accordingly, the understanding of EU citizenship as multi-level citizenship can be seen to have been central to the selection of research locales and research participants, the research methods and the sampling strategy employed in the research (see also Chapter 1).

Sheffield and Glasgow housed similar numbers of Roma EU citizens and had the same legal frameworks in relation to the rights of mobile EU citizens, with the conditions of access to economic, social and residence rights being defined at the supra-national (EU) and member state level (UK) level (see Chapter 1). However, the existence of differing policy frameworks at the national (England and Scotland) and local levels (Sheffield and Glasgow) meant that that access to services was variously the responsibility of local authorities, NGOs and voluntary sector organisations which may have lead to variations in the experiences and outcomes of the Roma populations resident in each city (see Chapter 1). As such, the conceptualisation of EU citizenship as multi-level (Maas, 2007; 2013b; Faist, 2001) was an integral part of the overall research process in that the cases were selected on the basis that they should provide insights into the impact of subsidiarity on the rights of Roma EU citizens (see Chapter 1).

Moreover, Phase 1 of the research involved a systematic mapping of the contemporary legal and policy structures at the supra-national and member state level in order to produce a topic guide for exploration in Phase 2 of the research. This is important because not only did this mapping generate the structural concepts that were central to the research but it also connected the empirical findings of the study to the wider literature and findings of previous research - or in other words, the emergent standing conditions of society (Layder, 1998: 88). It is worth noting that the project was *also* responsive to the behavioural or agential elements of EU citizenship. In Phase 2 of the project, semi-structured interviews, which are often seen to enhance the validity of research findings, were utilised. These permitted the depth and complexity of research participants' accounts to come to the fore (Mason, 2018). As such, in generating data derived from 'top-down' and 'bottom-up' analysis, each method of data generation was perceived to provide a distinct kind of evidence that, when used together, could offer a powerful resource to inform and illuminate both policy and practice (Ritchie *et al.*, 2014; Mason, 2018).

Furthermore, the project included two sets of research participants in two locales. The inclusion of two sets of research participants is important for two reasons. First, in comparing Roma EU citizens and key policy stakeholders' accounts in each research location, I was able to check that a 'nuanced understanding' (Beitin, 2013: 12) of Roma EU citizens' experiences had been reached at the local level. However, the aim when including two groups of research participants in two research locales was not simply to build a coherent narrative of Roma EU citizens' experiences. Rather, within the social realist approach, the purpose of comparative research is to identify the mechanisms that function within specific research locales and then to develop an understanding of why these mechanisms are activated in some cases but not others (see Bergene, 2007; Easton, 2010). Thus the inclusion of two sets of research participants in two research locales is particularly important because it allowed for the structures and mechanisms that explained Roma EU citizens' experiences at the local level to be identified and compared to the structures and mechanisms identified in Phase 1 of the research project with the aim of refining the conceptual framework and then generating explanations as to why some mechanisms were activated in some cases but not in others (see Bergene, 2007; Easton, 2010). As Blaikie (2010: 156 - emphasis in the original) notes:

Theory and research in the abductive research strategy [...] are intimately intertwined; data and theoretical ideas are played off against one another in a developmental and creative process. Regularities that are discovered at the beginning of the research will stimulate the researcher to ask questions and look for answers. The data will then be reinterpreted in light of the emerging theoretical ideas, and this may lead to further questions, the entertainment of tentative hypotheses, and a search for answers.

Research becomes a dialogue between data and theory mediated by the researcher.

Accordingly, in the case of this PhD research project, I engaged in a dialogue between EU citizenship theorised as multi-level (see Chapter 1) and the data that emerged on the lived experiences of Roma in my two research contexts.

Nevertheless, while efforts were made to ensure that the research was as robust as possible, the limitations of the chosen approach need to be acknowledged. As a white, working class, Scottish woman, I could be considered to hold an 'outsider' position - i.e. an individual who lacks experience, knowledge, status and trust within the Roma community (Minkler, 2004). Efforts were made throughout the project to build trust with Roma individuals in Sheffield and Glasgow. This involved attending a significant number of events aimed at Roma; engaging in volunteering work with local organisations in both Sheffield and Glasgow; and where necessary, using gatekeepers to access Roma participants. It was felt that these measures would help engender trust in the research process. That being said, it also has to be acknowledged that identities are complex and multifaceted and so it was not easy to predict how research participants and researchers would position themselves within the research encounter (Ryan *et al.*, 2011). Consequently, although positioned as an 'outsider' in some research encounters, my subjective position as a woman also meant that at times during the fieldwork, notably when interviewing women, I was at once an 'insider.'

Moreover, as noted above, gatekeepers were sometimes utilised in order to access Roma participants. As Ritchie *et al.* (2014: 90) note:

[T]here is real value in working with gatekeepers, particularly in studies involving vulnerable groups, where their close relationship with and knowledge of the participants can ensure that appropriate approaches are made.

It is nonetheless acknowledged that when gatekeepers are used to access excluded populations, there is a risk that the gatekeepers may be selective in whom they recruit (Lewis *et al.*, 2014). In order to counter this, throughout the fieldwork stage, a number of gatekeepers, including members of the Roma community, Romani, Slovak and Romanian interpreters and key policy stakeholders, were utilised in order to recruit a diverse range of people and maintain a gender balance and age distribution within the Roma sample. Nonetheless, during fieldwork in Glasgow, it became challenging to maintain the gender balance within the Roma sample. This was especially the case in

Glasgow due to many male Roma respondents being employed and unable to spare the time for a research interview (see Chapter 4). Therefore, while every effort was made to be inclusive and to access more excluded members of Roma communities in both research locales, the sample dynamics in relation to Roma participants are skewed with more women than men being interviewed. The purpose of this research is not however to make statistical correlations between variables. Rather, it seeks to develop an understanding of the policy and practice of EU citizenship grounded in the experiences and views of Roma in the UK. Consequently, the Roma sample meets the requirements of 'symbolic representation' (Ritchie *et al.*, 2014: 116) in that Roma research participants were chosen because they 'represent' and 'symbolise' Roma EU citizens as a group. Moreover, as Beitin (2014: 10) notes, '[a]sking who can provide a different perspective on a topic by nature of their role can be just as important as asking how many people are needed to answer the question.' By including two groups of research participants (Roma and Key Policy Stakeholders) the aim of the project was to add credibility to the research findings and conclusions by presenting a 'nuanced understanding' (Beitin, 2013) of the ways in which migrant Roma EU citizens' experienced their EU citizenship status in their host communities.

Finally, suitable interpreters were used based on the requirements of the research participants. As such, Slovakian, Romanian and Romani interpreters were utilised for 23 of the 30 Roma interviews. While aware of the ways in which interpreters may shape and/or distort research encounters (Jentsch, 1998; Temple and Edwards, 2006), for example, by speaking for the participants or through loss of meaning, interpreters were recruited from appropriate organisations, carefully selected on the basis of their experience, and provided with clear instructions on the procedures to be used in each interview.

Therefore, while there are limitations within the research, efforts were made to include a diverse range of people in the study and to minimise factors that may undermine the research findings. In addition to the measures outlined above, I was also conscious of my own role within the research

and the potential for bias. Accordingly, considerations of reflexivity were essential throughout the project: these included the use of a field journal and regular debriefings with my PhD supervisors in order to minimise this possibility.

Conclusion

To summarise: this PhD project adopts a social realist approach to research (see Blaikie, 2007: 145-151) in order to explore the opportunities and constraints created for migrant Roma resident in the UK by a multi-level framework of EU citizenship. Accordingly, both the research locales of Sheffield and Glasgow and the research participants were consciously selected based upon a theoretical understanding of EU citizenship as multi-level citizenship. Thereafter, the abductive research strategy was used in order to identify structures during the analysis of the empirical data and develop an understanding of how these structures work in context. The use of the abductive research strategy permitted me not only to analyse Roma EU citizens' experiences from the 'bottom-up' but also to include reference to 'top-down' structures and processes at the supra-national, UK, national and local levels (see Blaikie, 2007; 2010). This is the key strength of the approach adopted in this research project because, in building strategic comparisons into the research practice and analysis, I was able to show how things work differently or similarly in other relevant contexts and so develop cross contextual generalities which are well founded and can be demonstrated in relation to the wider universe (Mason, 2018: 59). As Mason (2018: 245) notes this 'is a particularly strong way of generalising from qualitative data because it is based on the logic of demonstrating how contexts and explanations are intimately connected, and which [sic] uses rather than glosses over specificity and difference.'

That being said, while the ontological and conceptual understanding of EU citizenship as multi-level citizenship was central to the overall research process, it is not considered to be a template from which to test theory (see Blaikie, 2007; 2010). The reason for this is that while I perceive there to be an external real world, I have no direct access to it and so my theories about it may not be correct

(see Layder, 1985). Accordingly, the abductive research strategy (Blaikie, 2007; 2010) was utilised to integrate the relationships between structure and agency and the micro and the macro because the empirical findings of the study were seen to be 'already theoretically saturated' (see Layder, 1998).

As Layder (1998: 8) notes:

[A]daptive theory proposes that greater adequacy and validity should be understood as the best approximation to truth given the present state of knowledge and understanding. It is not a once-and-for-all notion, and in this respect, adaptive theory, fully formed, simply represents the 'latest stage' in the elaboration of theory. It is always, potentially at least, revisable in terms of future research and theoretical developments.

In this respect, the project contributes to social theory by providing evidence and explanations in relation to the underlying social processes and structures that form Roma EU citizens' experiences of multi-level citizenship (see Ritchie *et al.*, 2014: 353). In the next chapter then, we begin our exploration of the ways in which multi-level citizenship was experienced by migrant Roma in the UK through a 'top-down' evaluation of the opportunities that multi-level citizenship may have offered to migrant Roma in the UK and how these opportunities may have differed in Sheffield and Glasgow (see Chapter 3).

Chapter 3: EU Citizenship as Opportunity I: Roma in the UK

The previous chapter outlined the methodological approach taken within this PhD project (see Chapter 2). This chapter adopts a 'top-down' approach - i.e. the presentation of an overview of the legal and policy frameworks at the EU, UK, national and local levels that may or may not have created opportunities for Roma in Sheffield and Glasgow. It does this in order to explore the opportunities that may have been created for migrant Roma by multi-level citizenship in the UK (see Chapter 1) and so, some of the differences in Roma experiences that we may see in Chapter 4.

Given that Roma communities in CEE countries experience endemic discrimination and exclusion, it has been suggested that Roma mobility occupies a grey area between free movement and forced migration (see Chapter 1). However, an individual's location within Europe has a major influence on the extent and quality of rights available to them, with paid labour markets and welfare systems differing according to the mobile EU national's chosen host member state (see Chapter 1). The structure of the paid labour market in the UK may have been particularly important in this regard with liberal market economies being associated with higher numbers of low paid jobs and so a high number of migrant workers (see Chapter 1). However, while the structure of the UK's paid labour market may have permitted Roma EU citizens to access employment in the UK, liberal market economies are also associated with fewer protections for workers (see Chapter 1). To this end, Dagilyte and Greenfields (2015; see also Brown *et al.*, 2016, Clark, 2017; Martin, 2021) have shown not only that Roma EU citizens migrate to the UK in order to access the paid labour market but also that Roma EU citizens are predominantly engaged in low-paid and precarious positions that involve some combination of instability, a lack of protection, and social or economic vulnerability (Rodgers and Rodgers, 1989).

The structure of the welfare system in the UK, however, may have created specific advantages for Roma, with low-paid workers in the UK being entitled to claim social assistance provisions - i.e. means tested provisions - that are designed to support those who are on a low income (Nagy,

2016b). Therefore, the combination of the UK's liberal market economy and liberal welfare system may have meant that Roma EU citizens could access economic opportunities as EU workers.

In 2004, the UK was one of only three countries to permit EU citizens from A8 member states unlimited access to the paid labour market. However, the free movement of A8 EU citizens not only created localised challenges for local authorities but also, due to media and political narratives, created the perception that A8 EU citizens were in competition with the host population for a finite number of jobs and local resources (see Chapter 1). As such, in 2007, the access of A2 EU citizens to the paid labour market in the UK was restricted because it was felt that A8 EU citizens had already filled labour market shortages and there were concerns about the social impacts of the free movement of migrants from CEE countries to the UK (see Chapter 1). Nonetheless, the UK's labour market performance following the 2008 economic crisis was also distinct, with the loss of employment, for example, being relatively benign (Gregg and Wadsworth, 2011; Coulter, 2016). As such, the number of EU citizens who migrated from Southern Europe to the UK increased sharply following the 2008 financial crisis (see D'Angelo and Kofman, 2018; Clark *et al.*, 2014). The 2008 financial crisis may have also presented A2 Roma EU citizens with an opportunity to access the paid labour market in the UK given that many of the jobs that were created in the 2008 to 2012 period were either part-time or self-employed positions (Coulter, 2016).

This chapter therefore proceeds as follows. Section 1 provides an overview of the free movement of Roma in Europe. Section 2 considers the opportunities created for Roma in the UK by the combination of the liberal market economy and the liberal welfare system. Section 3 highlights the ways in which the opportunities available to migrant Roma in the UK have changed over time. In this regard, section 3 is primarily concerned with the impact that the 2008 financial crisis may have had on Roma EU citizens resident in the UK. Section 4 is concerned with the different opportunities that were available to Roma EU citizens resident in England and Scotland. Thus it highlights the importance of different labour market opportunities; a differing approach to migrant inclusion;

variation in the generosity of social provisions and access to training and support services. Finally, section 5 highlights the different opportunities that may have been available to Roma in Sheffield and Glasgow. The chapter concludes by reiterating the key points raised.

Section 1: The Free Movement of Roma in Europe

In order to understand the situation for Roma in the UK, this section accounts for the wider context of Roma within Europe (Clark, 2014a). In CEE countries, Roma are, and historically have been, subject to endemic discrimination and exclusion (see Chapter 1). For example, it is estimated that during the Second World War, 25% of Europe's pre-war Roma population died as a result of Nazi persecution (see Chapter 1). Thereafter, with the end of hostilities, the situation for Roma in CEE countries improved on account of the rapid industrialisation at the heart of the Soviet economy which required an almost unlimited supply of manual labourers (see Chapter 1). As a result, during the Communist period 'the overall structure of the economies of CEE countries shifted decisively in a way that benefited Roma by opening to them new opportunities that never existed before' (Guy, 2001: 9). Simultaneously, however, all aspects of Roma culture were regarded by the Communist regime to be relics of the past and so Roma were required to abandon their identity in order to take advantage of the opportunities available to them. As Guy (2001: 12) notes:

While Communist rule had the effect of strengthening the social identity of Roma through their increased integration into the general labour force, it simultaneously endeavoured to destroy their ethnic identity by denying its existence in the vain hope that Roma would somehow dissolve into wider society.

While Communist economies needed low-skilled Roma labour, the post-Communist CEE states did not. Thus, with the fall of the USSR in 1991, Roma not only became almost universally unemployed but also experienced escalating discrimination and increased segregation in education and housing (Guy, 2001).

A few years later, in 1993, ten former Soviet states in the CEE region (Bulgaria, the Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Romania, Slovakia and Slovenia) applied for membership of the EU. However, after the fragmentation of the former Yugoslavia, Western Europe regarded the possibility of ethnic conflict to be one of the primary threats to European security. In contrast to previous European enlargements, the principle of conditionality was thus enshrined within the Copenhagen Criteria. The Copenhagen Criteria required candidate states to have stable institutions guaranteeing democracy, the rule of law, respect for human rights and the protection of minorities, a functioning market economy, and the ability to take on the obligations of membership. However, not only did the PHARE programmes do little to improve the material conditions for Roma in CEE countries (see Chapter 1) but the requirement that CEE candidate states had a functioning market economy in effect exacerbated the exclusion of Roma within CEE states, with reforms to the welfare systems having a disproportionate impact on them (Van Baar, 2012).

For example, the Slovak government and the European Social Fund co-funded an activation programme in Slovakia (see Van Baar, 2012). This had a significant impact on Roma for two reasons. First, while the policy did not specifically target Roma, not only are Roma more likely to be unemployed than non-Roma (European Agency for Fundamental Rights, 2014) but Roma were often discriminated against when they engaged with employment offices in Slovakia (see Van Baar, 2012). The consequence of this was that practically all of those who were registered in activation programmes were Roma (Van Baar, 2012). Second, the policy allowed for unemployed workers to be continuously engaged in activation work and so, employers fired their employees and replaced them with individuals from the activation programmes. The continuous engagement of unemployed people in activation activities had a particularly significant impact on Roma: 60% of those who were involved were dismissed as a result of the policy before being required to carry out the same work as they did before in exchange for unemployment provisions (Van Baar, 2012). As such, Van Baar (2012: 1300) concludes:

The governance of activation has frequently led to a situation where Roma who are formal citizens do not enjoy basic rights because their marginalised and second-class work position, rather than their official citizenship status, determines their living conditions.

In addition, during the enlargement period, there was a tendency for policy makers and elites in Europe to frame Roma as a 'transnational European minority' (Vermeersch, 2012). As Van Baar (2011: 204) notes:

Reframing Romani identities as 'European' had become a catalysing tool to empower Roma, to facilitate their inclusion, to guarantee their access to justice and public services, and to renounce the authoritarian Roma approaches of former communist regimes in Central and East Europe.

This reframing of Roma as 'a true European minority' (Council of Europe 1993 quoted in Van Baar, 2011: 204) proved to be highly problematic for two reasons. First, during the 1990s many Roma sought to escape the endemic discrimination that they had experienced in CEE countries by claiming asylum in Western Europe (see Chapter 1). Roma claims for asylum were often unsuccessful because not only was their mobility perceived to be economic but also because all CEE states were considered safe (see Chapter 1). This created a perception within Europe that Roma were 'bogus asylum seekers' (see Guy, 2003). Thus, prior to the A8 enlargement, Roma mobility within Europe had been 'irregularised' (Squire, 2011) with the European Commission (quoted in Vermeersch 2002: 88), for example, arguing in reference to the Copenhagen Criteria, that it is 'important to allay fears of large-scale migrations that can exist in the EU countries by taking steps to improve the situation of the Roma, so that there would be no impetus for such migrations.' Second, while the Copenhagen Criteria was introduced in order to reassure enlargement-sceptic states such as France, rather than represent a process of negotiation, the Copenhagen Criteria were a form of 'governance by conditionality' for the candidate states (Schimmelfennig and Sedelmeier, 2004). Therefore, the

introduction of the Copenhagen Criteria led to the perception within CEE states that it was Roma, rather than inadequate minority protections, that were hindering accession to the EU (Vermeersch, 2012). As Vermeersch (2012: 1197) argues:

[T]he new tendency to single out the Roma as a European priority and a special European concern has also, rather paradoxically opened up new opportunities for nationalist politicians to plead against the new measures to help the Roma [...] [and] to exclude them symbolically from their own national space.

Endemic discrimination towards Roma continues in the CEE region today. For example, the Roma population in Slovakia constitutes just 10% of the total population but Roma children represent 60% of children in segregated schools and 85% of children in segregated classes (Amnesty International, 2011: 6). Similarly, many Roma in CEE countries live in segregated housing, or on the peripheries of towns and cities, spatially segregated and excluded from the majority population, and with limited access to mainstream services and basic sanitation (Marusak and Singer, 2009; European Agency for Fundamental Rights, 2014). Housing segregation and Roma's low socio-economic status confound the problems that Roma experience when they try to access education in CEE countries because they are required to pay the costs of transport, clothes and school materials (Amnesty International, 2015). It is on account of this discrimination that Roma EU citizens often have significantly lower levels of education than non-Roma CEE EU citizens, with 82-85% of Roma school leavers in Slovakia and the Czech Republic not completing upper secondary education (European Agency for Fundamental Rights, 2014: 34). This low educational attainment, alongside labour market discrimination, limits the economic opportunities available to Roma in CEE countries (European Agency for Fundamental Rights, 2014). As Marusak and Singer (2009: 188) note '[t]he education system itself further reproduces Roma exclusion.'

On 1st of May 2004, the Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia and Slovakia, alongside Cyprus and Malta, became EU member states. Subsequently, in 2007, Romania

and Bulgaria also became EU member states. This represented an important opportunity for Roma with the European Commission (2005: 2), for example, stating that EU Citizenship, which includes the right to free movement and non-discrimination (see Chapter 5), would empower Roma to seek 'social justice and active participation [...] in economic and social life' within Europe. However, the reception that Roma received in Western Europe has not been welcoming (Clark, 2014a) with Roma being collectively expelled from Italy in 2008 and the French government targeting and then deporting Romanian and Bulgarian Roma from France in 2010 (see Chapter 1).

As a result of the expulsion campaigns in Italy and France, the EU Framework for National Roma Integration Strategies (NRIS) up to 2020 was established. The NRIS was considered to be complementary to existing EU legislation (see Chapter 5) but also proposed 'addressing the situation of Roma in terms of employment, poverty and education in order to progress towards Europe 2020 employment, social inclusion and education targets' (European Commission 2011: 4). As such, NRIS called on all member states to develop targeted and integrated approaches to Roma inclusion in order to address the situation of Roma in relation to education, employment, health and housing (European Commission, 2014). Member states were asked to include regional and local authorities in the implementation, monitoring and review of the NRIS and to make use of the European Social Fund. However, the NRIS placed significant emphasis on economic inclusion as the core challenge for Roma (Martin, Scullion and Brown, 2018). Accordingly, Goodwin and Buijs (2013: 2044) have suggested that as a 'consequence of how social progress is defined, if Roma wish to be the recipients of the benefits of EU citizenship, such as free movement, they must first learn to be good EU citizens.'

Section 2: Opportunities for Roma EU Citizens in the UK

This section will outline the economic opportunities available to Roma EU citizens in the UK. The UK, alongside Ireland and Sweden, chose to immediately open its labour markets to the new A8 EU citizens following the 2004 EU enlargement. The UK introduced the Workers Registration Scheme

(WRS) for A8 free movers. The WRS required A8 EU citizens to register as soon as they started working in the United Kingdom and restricted their access to EU Jobseeker Status until they could show that they had been engaged in the paid labour market for a period of 1 year with no more than a 4-week break. The purpose of the WRS was therefore not to restrict CEE EU citizens' access to the paid labour market, but rather their access to welfare (Anderson *et al.*, 2006), in particular, JSA (see Table 1: The rights of CEE EU citizens during the transitional periods in the UK). JSA is designed to facilitate access to the paid labour market (see O'Brien, 2015; 2017) and so, the restriction to A8 EU citizens' access to JSA would have made it difficult for Roma EU citizens who did not have friends or family resident in the UK to access the paid labour market.

By 2007, over a million CEE EU citizens had migrated to the UK (Pollard *et al.*, 2008). However, the UK was largely unprepared for the free movement of substantial numbers of arrivals. Dustman *et al.* (2003), whose analysis was based on the assumption that Denmark, Germany, Ireland, the Netherlands, Sweden and the United Kingdom would all allow A8 EU citizens access to their paid labour markets, had estimated that the net inflows of A8 EU citizens following the 2004 enlargement would be between 5,000 and 13,000 annually. Thus the discrepancy between the forecasted figure and the actual number of A8 EU citizens who migrated to the UK can partially be explained by the decision of the majority of EU15 member states to restrict the free movement of CEE EU citizens (see Chapter 1).

The structure of the UK's paid labour market, however, also played a significant role in attracting CEE free movers (Ruhs and Martin, 2008). The UK has a liberal market economy and so, when compared to more coordinated market economies, it is easier for workers to access paid employment (see Chapter 1). The importance of this factor was confirmed by a key policy stakeholder who noted that the UK may have been a favoured destination for Roma:

I think the pull factors in terms of the UK are pretty important – the way in which the UK economy has, as we know, failed to in the last ten years, since the financial crash,

has failed to invest in increasing productivity of workers and has relied upon the availability of casualised, unskilled or lower skilled workers to an extent that say the French or particularly the German economy haven't had. It is has meant that people have quickly found out that even without competence in spoken English it's pretty easy if you are determined to start picking up shifts in big employers, as well as small casualised sectors of the economy, without a lot of training and without a lot of vocational skills and, I think, the examples are agriculture, food processing, picking and packing – the ASOS and Amazon worlds. I mean, these jobs just aren't available in Northern Romania, Eastern Slovakia – they are deserts, as we know, in terms of employment. Combined with the push factors which is the continuing impact of increasingly reactionary and xenophobic regimes Eastern Europe - Czech Republic, Slovakia, Hungary, Poland and in Romania. Despite massive attempts by the EC to persuade the national governments to have a more aggressive attitude towards Roma inclusion, it's quite clear that has had no effect on the ground. So, the push factors in terms of the institutional instability in those countries is the same as it was for the last twenty years. But that combined with the attractiveness of the UK economy, I think is really helpful in explaining this. (SKPS02: Policy and Information Worker, Male)

The issue of labour market access has also been addressed within the academic literature on Roma in the UK with Dagilyte and Greenfields (2015; also see also Clark, 2017) finding, for example, that access to the paid labour market was the primary reason for Roma EU citizens' free movement to the UK and Martin *et al.*, (2017) finding that free movement was often an emancipatory experience for Roma because it permitted them access to employment in the UK. However, within liberal market economies workers are also accorded fewer employment rights and protections than if they were engaged in a more regulated paid labour market (see Chapter 1). As a result of the limited protections offered to workers in the UK, the New Labour government introduced a series of

measures in 1997: these measures included the Minimum Wage, Tax Credits and support with childcare costs. This meant that low-income workers who were engaged in the paid labour market were entitled to claim social assistance provisions, or in other words, in-work benefits.

While A8 EU citizens were permitted access to the paid labour market in 2004, the free movement of A8 EU citizens not only created challenges for local authorities but mediated debates about free movement created the perception that A8 EU citizens were in competition with the host population for a finite number of jobs and resources (see Chapter 1). Therefore, when Romania and Bulgaria joined the EU in 2007, not only did their citizens' relocation to the UK face similar restrictions to A8 EU citizens in that they could not access JSA until they could show that they had been engaged in the paid labour market for a period of 1 year with no more than a 4-week break, but their access to Pay As You Earn (PAYE) was restricted to the Seasonal Agricultural Workers Scheme and the Sector Based Scheme (see Table 1: The rights of CEE EU citizens during the transitional periods in the UK).

Table 1: The rights of CEE EU citizens during the transitional periods in the UK

Group	Economic Rights	Social Rights
A8 EU Citizens (2004 - 2011)	Unlimited access to the paid labour market but required to register on WRS.	<p>Access to social assistance provisions while engaged in paid labour.</p> <p>Access to Jobseekers Allowance if they could document that they had been engaged in the paid labour market for 1 year with no more than a 4 week break.</p>
A2 EU Citizens (2007 - 2014)	<p>Access to PAYE was restricted to the Seasonal Agricultural Workers Scheme and the Sector Based Scheme.</p> <p>Unlimited access to self-employed work.</p> <p>Unlimited access to the paid labour market if they could document that they had been engaged in the paid labour market for a period of 1 year with no more than a 4 week break.</p>	<p>Access to social assistance provisions while engaged in paid labour.</p> <p>Access to Jobseekers Allowance if they could document that they had been engaged in the paid labour market for 1 year with no more than a 4 week break.</p>

Many Romanian Roma EU citizens opted to migrate to other EU countries, particularly those with languages similar to Romanian, such as France, Italy and Spain (Morris, 2016). Shortly thereafter, however, Spain and Italy were two of the countries most affected by the 2008 financial crisis. The migration of Italian and Spanish EU citizens thus increased between 2008 and 2011 (Clark *et al.*, 2014), as citizens of those countries chose to migrate in search of better employment opportunities. The UK was a significant recipient of these increased migration flows with National Insurance registrations from Spain, for example, more than doubling between 2009 and 2011 (Clark *et al.*,

2014). At the same time, the 2008 financial crisis also exacerbated the socio-economic position of many Roma EU citizens in those countries (see Parker, 2012; Parker and López Catalán, 2014; Hepworth, 2015). Romanian Roma EU citizens who had previously migrated to Spain and Italy may therefore have opted to engage in further free movement in order to access economic opportunities in the UK (see Chapter 4).

The economic opportunities that Romanian Roma EU citizens were able to access would have been limited by the transitional arrangements: indeed one of the easiest ways for A2 EU citizens to establish themselves as EU workers in the UK was through self-employment (see Anderson, 2010). This may, however, have been beneficial to A2 Roma EU citizens because self-employment can provide a route into work for many disadvantaged unemployed groups, including women and mothers as well as migrants (Hatfield, 2015). Indeed both Spain and Italy have a high proportion of self-employed workers due to the prominence of agricultural, service-based and informal work in these countries (Hatfield, 2015). However, the earnings of self-employed workers tend to be much more volatile than those of PAYE workers (Hatfield, 2015). Access to in-work benefits would, therefore, would have been of particular importance to A2 Roma EU citizens.

A2 Roma EU citizens' access to in-work benefits soon came to the attention of influential figures within the UK with Simon Ashley, the then leader of the Liberal Democrat Party, pressuring the Roma Strategy Group, a subsidiary of Manchester City Council, to intervene in relation to the 'Big Issue loophole' (Leggio, 2019: 86) - i.e. a supposed loophole which gave Roma EU citizens who were not engaged in 'genuine' (see Chapter 5) self-employment access to in-work benefits. The Roma Strategy Group wrote to the Big Life Group in 2010 and requested that Roma be excluded as Big Issue vendors: their argument was that employment through the Big Issue allowed Roma to establish themselves as self-employed for the purposes of claiming in-work benefits when they supposedly had no intention of seeking other forms of employment (see Leggio, 2019). The Big Life Group regarded the letter as mis-representing the intentions of Roma and so sought the legal advice of

Cherie Blair, a human rights lawyer and wife of the former Prime Minister Tony Blair. Cherie Blair (quoted in Leggio, 2019: 77) stated:

In my opinion, this attempt to use the public order powers of the Council to achieve a reduction in the benefits given to Roma only vendors is both for an improper purpose and discriminatory and therefore void and the Big Issue is entitled to refuse to comply.

The combination of the UK's liberal market economy and liberal welfare system meant that Roma EU citizens could access economic opportunities as EU workers in the UK (see Chapter 4). However, the economic opportunities that Roma groups were able to access would have differed with A8 Roma EU citizens having, at least theoretically, unlimited access to the paid labour market after 2004 and A2 Roma only being permitted to access PAYE employment in 2014 (see Table 1). The labour market position of A2 Roma would thus have been more precarious than the labour market position of A8 Roma prior to 2014. In many ways, therefore, the restrictions on the free movement of A2 Roma EU citizens can be seen to have reinforced and reshaped pre-existing and widespread prejudices towards Roma (Van Baar, 2011) in the UK with mediatised debates about the free movement of Romanian and Bulgarian EU citizens to the UK in 2012 contributing to David Cameron's January 2013 pledge to renegotiate the relationship between the UK and the EU (Leggio, 2019) (see Chapter 1).

Section 3: Changing Opportunities for Roma in the UK

This section will highlight the ways in which the opportunities available to migrant Roma in the UK have changed over time. The UK has a substantial Roma population (see Chapter 1), located across the country: primarily in the North West of England, London, Yorkshire and the Humber, the East and West Midlands, the South East, the South West of England, Scotland and Wales (Brown, Martin and Scullion, 2013). Roma migration to the UK began prior to 2004 but increased following the 2004 enlargement (see Chapter 1). The settlement patterns of Roma EU citizens are often linked to chain migration and the presence of familial networks and informal contacts who act as an informal social

security system within Roma communities (Clark, 2017). As Dagilyte and Greenfields (2015: 478) note:

[Roma] commonly expressed a preference for co-residence with family members whilst adapting to life in the UK, and developing networks and saving money towards establishing their own households. In common with findings from studies of Pakistani migration and accommodation pathways, once a new household has been set up, often in close proximity to immediate kin, it was regarded by all Roma participants - and confirmed by support workers in one locality - as 'commonly accepted' that accommodation in the new house would be offered to kin participating in chain migration who were seeking to establish themselves in the UK.

Dagilytes and Greenfields (2015: 478; see also Greenfields and Dagilytes, 2018) report that Roma EU citizens indicated that they would engage in any form of employment in order to 'bring money into the family.' Indeed, it is not uncommon for newly arrived migrants to engage in the grey labour market - i.e. parts of the economy that are not taxed or regulated by the government - with Piore (1979), for example, having shown that language barriers in combination with a limited understanding of the paid labour market in their host state and lower subjective expectations meant that newly arrived migrants were more likely than national citizens and more established migrant groups to accept grey labour market employment. This may have been a particular problem for CEE EU citizens in the UK for two reasons. First, an important consequence of the lack of labour market enforcement is that 'on average, a firm can expect a visit from Her Majesty's Revenue and Customs (HMRC) inspectors once every 250 years and can expect to be prosecuted once in a million years' (Migration Advisory Committee, 2014 quoted in Ruhs, 2017: 27). Second, prior to 2004, the flexibility of the UK labour market, combined with a restrictive immigration policy, resulted in high numbers of irregular migrants within the UK (Wright, 2010). However, since 2004, the legislation in relation to the employment of irregular migrants in the UK has been strengthened (see Ruhs and Anderson,

2010; Yuval Davis *et al.*, 2018). As a result, a number of irregular workers were displaced from the UK's agricultural sector following the 2004 EU enlargement (Scott *et al.*, 2008).

Since the 1980s there has been a reduction in the number of low-waged British workers who are willing to work in the agricultural sector (see Anderson and Ruhs, 2010; Geddes and Scott, 2010; Scott, 2013). The reasons why British workers are reluctant to engage in the agricultural sector in the UK are complex (see Scott *et al.*, 2008; Ruhs and Anderson, 2010b; Geddes and Scott, 2010; Scott, 2013), but at a basic level, unemployed British workers do not engage in the agricultural sector for three key reasons. First, agricultural work is very physically demanding and so would not be suitable for older and/or disabled workers (Geddes and Scott, 2010). Second, these forms of employment tend to be seasonal and highly precarious and so, forgoing regular benefits payments in favour of irregular employment and uncertain income would be a risk for an unemployed British worker (Geddes and Scott, 2010). Third, the employment opportunities that are available in the agricultural sector tend to be located in rural areas, while low-paid British workers tend to be geographically fixed in more urban areas on account of childcare responsibilities and mortgages etc (Geddes and Scott, 2010; Anderson and Ruhs, 2010). However, CEE EU citizens tended to be younger than British nationals (Pollard *et al.*, 2008), were not geographically fixed to a particular location in the UK (see Anderson and Ruhs, 2010) and had limited access to EU Jobseekers' status between 2004 and 2011 (see Table 1: The rights of CEE EU citizens during the transitional periods in the UK). The result of this was that post-2004, a number of rural regions, which are not typically associated with migration, recorded a sharp rise in the number of CEE migrants resident in the area (Bauere *et al.*, 2007) leading Scott and Brindley (2012) to suggest that a new geography of migrant settlement had materialised in the UK – one which is specifically linked to the geography of the UK food industry.

We would therefore expect the settlement patterns of Roma EU citizens to be similar to the settlement patterns of non-Roma CEE EU citizens. There were, however, similarities and differences between the free movement of Roma EU citizens and non-Roma CEE EU citizens. Roma, like their

non-Roma counterparts, tended to be younger than the host population with Dagilytes and Greenfields (2015), for example, finding that the average age of their A8 Roma respondents was 35 years old. However, while non-Roma CEE migrants tended to perceive their free movement to be temporary (Pollard *et al.*, 2008), Roma free movement is driven by the desire to escape endemic persecution in the CEE region (see Chapter 1) and so provide a better life for their children (Fremlova *et al.*, 2009). The settlement patterns of Roma EU citizens then, have been linked not only to the existence of wider family networks but also their access to affordable housing (Brown, Martin and Scullion, 2013; see also Clark, 2017). Access to affordable housing would have been of particular importance to Roma EU citizens wishing to settle in the UK because residence in poor quality housing and overcrowded accommodation can lead to social care interventions under the Children's Act 1989 (Dagilytes and Greenfields, 2015: 477). Social care interventions have been a significant problem for Roma in the UK with Kostka (2022), for example, reporting that between 2009 and 2015, there had been a 733% increase in the number of Roma children in foster care in the UK. As a result, it could be argued that access to adequate welfare benefits relates to social justice for migrant Roma populations both in the UK and the EU more generally (Dagilyte and Greenfields, 2015: 447; see also Clark, 2014a).

Grey labour market employment, however, may not have permitted Roma EU citizens access to social benefits in the UK (Greenfields and Dagilytes, 2018). For example, within the agricultural sector the use of gangmasters is common. Gangmasters are responsible for the recruitment of workers and the provision of transportation and accommodation for their workers but they charge fees for their services and so it is not in a gangmaster's interest to provide their employees with regular employment (Scott, Craig and Geddes, 2012). Therefore, while Roma EU citizens who were sharing accommodation with family and friends may have been prepared to engage in any form of employment in order to 'bring money into the family' (Dagilytes and Greenfield, 2015), these forms of employment are unlikely to have permitted Roma to access social assistance provisions as EU

workers with the result being that they would have been unable to secure their own accommodation in the UK.

However, within the UK food industry itself there has been a large-scale shift as a significant number of jobs have moved 'from the field to the factory' (Geddes and Scott, 2010). These jobs are similar to jobs in the agricultural sector in that they are very physically demanding and often seasonal (Geddes and Scott, 2010). Nevertheless, they differ from jobs in the agricultural sector in the UK in two key ways. First, only 8% of workers who work in food processing roles in the UK work less than full-time hours (BRES, 2018 cited in Webb *et al.*, 2018). Second, food processing factories are predominantly located on the 'urban fringes' (Cheshire and Lancashire, South and West Yorkshire, the West Midlands, the Central belt in Scotland and South Wales) or spread along major arterial routes (M1, A1, M6, M62, M4 and M5 motorways) and close to a number of key ports and airports. These 'clusters' of food processing work may be important in relation to the settlement patterns of Roma EU citizens because not only were A8 migrants accessing food processing jobs in established migrant neighbourhoods post-2004 (Scott and Brindley, 2012), but the areas outlined by Scott and Brindley (2012) were more or less the geographic areas highlighted in Brown, Martin, and Scullion's (2013) attempt to estimate the size of the Roma population in the UK.⁴

It follows, therefore, that even at the bottom end of the labour market there may be employment hierarchies (Scott *et al.*, 2008) with Dagilytes and Greenfields (2015), for example, reporting that Roma EU citizens were predominantly engaged in picking, packing and driving roles in the UK. However, after 15 years of near continuous employment growth in the UK, the 2008 financial crisis and the subsequent 'great recession' were both longer and deeper than the recessions in the 1980s and 1990s (Gregg and Wadsworth, 2011). During the 2008 financial crisis, the expectation was that the fall in employment would be in line with the percentage fall in GDP as this was what had

⁴ Brown, Martin, and Scullion (2013) found that 38,976 Roma people were residing in the North West of England; 35,997 were residing in London, 25,451 Roma were residing in Yorkshire and the Humber, 23,530 in the East Midlands ; 23,316 were residing in the West Midlands; 19,853 in the South East; 3,030 in Scotland (see Chapter 4); 2,994 in South West of England and 878 in Wales.

happened during previous recessions (see Gregg and Wadsworth, 2011). However, when compared to both previous recessions and other OECD countries, the UK's labour market performance following the 2008 economic crisis was distinct.

The recessions that took place in the 1980s and 1990s took place against a backdrop of high inflation. The 2008 financial crisis, however, differed in that it reflected a downsizing in the credit cycle rather than being a consequence of a contraction in monetary policy (Coulter, 2016). Therefore, while profitability prior to the previous recessions was already being squeezed, prior to the 2008 recession profits were much higher (Gregg and Wadsworth, 2011). As such, the immediate pressure on firms to cut jobs in order to survive was reduced. Moreover, there were also differences in relation to the macro-economic policies that were enacted following the 2008 financial crisis. These were considerably more expansive with policy makers, for example, opting to cut interest rates, introduce financial stimulus and cut taxes for low earners (see Coulter, 2016). As such, Coulter (2016: 199) has suggested that there:

are grounds for supposing that the supportive macro-economic environment played an important part in the United Kingdom's rebound from the recession and stands in considerable contrast to the response to the recessions of the early 1980s and 1990s when policy was a lot tighter.

Therefore, while in other EU member states, such as Spain and Ireland, the rise in unemployment exceeded the fall in output (Gregg and Wadsworth, 2011), in the UK the loss of employment was relatively benign when compared to the fall in GDP (Gregg and Wadsworth, 2011; Coulter, 2016).

The 2008 financial crisis still had four key consequences for workers in the UK. First, there was a uniform fall in real wages across all sectors (Coulter, 2016; see also Gregg and Wadsworth, 2011). Second, in retaining employees, employers were under-utilising the labour available to them and so, may have been able to grow during the recovery without recruiting new staff (Gregg and Wadsworth, 2011). As a result, the economic opportunities that were available to unemployed workers would

have been limited when compared to the economic opportunities that had been available prior to 2008 because not only were there lower rates of job creation (Coulter, 2016) but there were also lower rates of employee turnover. As Gregg and Wadsworth (2011: 19) note:

The overall picture for employment has been surprisingly good, but whilst job shedding has been less common than before, firms have frozen recruitment and vacancies have become scarcer. Cutting back on hiring doesn't involve the loss of experienced staff and any natural outflows caused by quits and retirements are a relatively costless way of reducing employment numbers. This does, however, create acute problems for those who are trying to enter the labour market.

Third, during the 1980s and 1990s the UK labour market became increasingly polarised with increases in employment in high and low skilled sectors but decreases in employment in medium skilled sectors. Between 2008 and 2012 there was a sharp increase in this polarisation with the number of low-skilled jobs expanding considerably, the number of high skilled jobs expanding albeit at a slower rate, and the number of medium skill jobs continuing to decline (Coulter, 2016). Consequently, post-2008 there was a higher availability of low-paid employment in the UK.

However, the fourth key consequence for workers is that many of the jobs that were created in the 2008 to 2012 period were either part-time or self-employed positions (Coulter, 2016). In 2010, 40% of the growth in UK employment was accounted for by a rise in self-employed workers (Hatfield, 2015). In this regard, the UK can be seen to be an 'outlier' in Europe with the rapid rise in self-employment following the 2008 financial crisis driving its overall growth in total employment (Hatfield, 2015). The extent to which workers in the UK were opting for self-employment over PAYE employment can be questioned as the percentage of self-employed workers who were looking for another job almost doubled between 2007 and 2012 (Hatfield, 2015). Consequently, there has been an ongoing debate in the UK about whether the rise in self-employment following the 2008 financial

crash was indicative of a strong labour market recovery or a lack of alternative economic opportunities (see Hatfield, 2015).

While unemployment differentials between migrants and UK nationals had increased during previous recessions, following the 2008 financial crisis, similar increases in unemployment were observed for both migrants and nationals (Greg and Wadsworth, 2011). CEE EU citizens resident in the UK then, may not have been significantly impacted by the 2008 financial crisis with Clark *et al.* (2014) suggesting that the number of Polish workers resident in the UK declined as a result of their increasing access to paid labour markets in other European states, alongside an improving economy in Poland and the appreciation of the Złoty relative to the pound from 2007 onwards.

However, the 2008 financial crisis did have a significant impact on Roma. The labour market relations of Roma EU citizens tend to be structured according to gender, with women staying at home as housewives and mothers and men engaging in paid employment (see Martin, 2021; Migration Yorkshire, 2018a). The financial crisis had a more significant impact on the employment opportunities available to men than women with the initial recession particularly affecting male dominated professions such as construction and manufacturing (Ruberty and Rafferty, 2012). Furthermore, some Roma EU citizens experienced significant obstacles when they attempted to access the paid labour market in the UK with language barriers, in combination with low levels of education and at times illiteracy, having been well documented in the existing literature (Poole and Adamson, 2008; Poole, 2010; Dagiltyle and Greenfields, 2015; Clark, 2017; Martin *et al.*, 2017; Dinu and Scullion, 2019). Given that the employment rate for people with low levels of education declined substantially during the recession (Gregg and Wadsworth, 2011), the financial crisis not only made the employment situation of Roma EU citizens even more precarious but also led to increased levels of activity within the grey labour market (Brown, Dwyer and Scullion, 2013).

As noted above, the flexibility of the paid labour market in the UK and lack of labour market enforcement meant that migrant workers were often engaged in the grey labour market. This

situation is beneficial for employers as it allows them to lower their labour costs (Ruhs and Anderson, 2010). The proliferation of self-employment in the UK, however, may have been particularly beneficial for employers who wished to engage migrants in the grey labour market because not only would this have allowed them to lower their labour costs (Ruhs and Anderson, 2010) but it would also have allowed them to avoid their tax and national insurance responsibilities (Clark, 2014b). Thus, in the UK, there was an increasing suspicion that many self-employed workers were effectively employees by another name (Hatfield, 2015: 32) or in other words were engaged in 'false self-employment' (Clark, 2014b). These forms of employment may have been particularly beneficial for Roma EU citizens because they would have allowed them to access the paid labour market (Hatfield, 2015). However, these forms of employment would also have differed from the forms of self-employment that EU citizens had previously engaged in - i.e. the construction industry (see Anderson et al., 2006; see also Anderson, 2010) - because the 2008 financial crisis had a significant impact on that sector (see Ruberty and Rafferty, 2012).

That said, the impact that the 2008 financial crisis had on Roma EU citizens may also have been dependent upon their status as either A8 or A2 EU citizens. In 2011, the WRS ended, meaning that A8 EU citizens resident in the UK had access to their full rights as EU citizens - i.e. they were able to access social assistance benefits as both EU workers and EU Jobseekers. This upgrade in status would have been beneficial for A8 Roma EU citizens for two reasons. First, during the A8 transitional period, A8 Roma resident in Glasgow had been engaging in the grey labour market because they could not access EU Jobseekers Status and so the support services provided by JobCentre Plus (Poole and Adamson, 2008). Second, as noted in Section 2, JSA is designed to facilitate access to the paid labour market (see O'Brien, 2015; 2017) and so, the restriction to A8 EU citizens' access to EU Jobseekers Status during the A8 transitional period would have made it difficult for A8 Roma EU citizens who did not have friends or family resident in the UK to access the paid labour market in the UK.

In 2014, however, the Westminster government made two significant changes to the rights of EU citizens resident in the UK (see Chapter 5). First, the introduction of the MET required that an EU citizen earn £162 (2018/19) for a period of three months in order to 'have their work classified as work' (O'Brien, 2015: 112). Second, EU citizens were prevented from accessing Housing Benefit - a means tested provision that could be considered part of the package designed to facilitate access to the paid labour market (see O'Brien, 2015; 2017; Dagilyte and Greenfields, 2015) - during times of unemployment unless they could show that their previous employment had met the conditions of the MET (see Chapter 5).

The economic opportunities available to Roma in the UK can thus be seen to have changed over time with the 2008 financial crisis not only meaning that the labour market positions (see Clarke and Cominetti, 2019) became more precarious but also that it would have been easier for Roma to enter the paid labour market post-2008 than it had been in 2004. However, the impact that these changes in the paid labour market had on Roma EU citizens would have varied in accordance with their status as either A8 or A2 EU citizens, with the ending of the WRS in 2011 meaning that A8 Roma EU citizens would, like British citizens, have had a choice between forgoing regular benefits payments in favour of irregular employment and uncertain income while A2 Roma would not. Post-2014, access to social assistance benefits was restricted for all EU citizens unless they could show that they had attained EU worker status. This would have been particularly problematic for Roma with the stricter conceptualisation of an EU worker having disproportionately adverse impacts on groups of EU citizens with more limited and/or patchy engagement in the paid labour market (O'Brien, 2015). Nevertheless, the impact of the 2014 changes would also have differed depending on the point at which an EU citizen had migrated to the UK because once employment networks become entrenched in particular sectors they often continue to function even if the legislative framework shifts (Massey, 1990).

Section 4: Opportunities for Roma EU Citizens in England and Scotland

This section will highlight the different opportunities for Roma in England and Scotland. As noted in Section 1, the EU's Framework for NRIS up until 2020 was the EU's first attempt to implement a co-ordinated, 'top-down' strategy on all EU member states (Martin, Scullion and Brown, 2018). However, stereotypical representations of Roma EU citizens as 'welfare tourists' have been central to the politicisation of free movement in the UK and the subsequent referendum on EU membership (see Chapter 1). Perhaps for this reason, the UK's NRIS effectively ignored migrant Roma and instead focused on indigenous Gypsy and Traveller groups (see Craig, 2011; Brown, Martin, and Scullion, 2014). However, Scotland and England have adopted very different approaches to migration/migrants in general and to Roma migrants in particular.

The reasons for this divergence in approach are predominantly economic. The flexible labour market structure is similar throughout the UK and so the paid labour markets in both England and Scotland are characterised by a demand for migrant workers. However, the demand for migrant labour may be greater in Scotland for three reasons. First, Scotland has traditionally been a country of net emigration (see Chapter 1). Second, in Scotland there have been high levels of youth out-migration and low levels of unemployment in some rural areas of Scotland (see Chapter 1). And third, one fifth of the Scottish population is located in the Central Belt (see Chapter 1) – i.e. in urban areas. As such, Hepburn (2014) has suggested that Scotland's divergent approach to migration is not related to public opinion but rather issues of demographics and economic growth.

Powers over migration policy are reserved to the Westminster government (see Chapter 1). Thus, while the Scottish government may want to increase migration to Scotland, their ability to influence border policy is limited. That being said, with the creation of devolved legislatures in Scotland, Wales and Northern Ireland, the responsibility for migrant inclusion has been *de facto* decentralised. Accordingly, it is not just Scotland's approach to migration that differs from that of England (see Chapter 1) but also its approach to migrant Roma with the Runnymede Trust (2016: 6), for example,

reporting that while ‘Scotland, Wales and Northern Ireland have given specific and targeted attention to Roma inclusion, through the development of a Roma Integration Strategy [...] this has not been the case for England.’

The UK does not have a distinct migrant inclusion policy. Rather, policy that addresses migrants’ needs tends to be subsumed within the UK’s approaches to race relations, ethnic minorities and equalities (Hepburn, 2014). As a result, the UK has some of the most advanced anti-discrimination legislation in Europe (Hepburn, 2014). However, while historically the UK has embedded its approach to migrant inclusion in a ‘race relations’ model which prioritised the language and principles of multiculturalism (i.e. an approach that attempted to foster tolerance and respect for different cultures), since the early 2000s the race relations model has come under increasing attack as it was perceived to create ethnically segregated ‘parallel lives’ (see Hepburn, 2014; Lewis and Craig, 2014). Consequently, the UK’s approach to migrant inclusion changed from an approach that saw migrant inclusion as a two-way process towards one that perceives migrant inclusion to be a one-way process and thus downplays difference at both the national and local levels (Lewis and Craig, 2014). To this end, in his speech at the Munich Security Conference in 2011, the then Prime Minister David Cameron, noted:

We must build stronger societies and stronger identities at home. Frankly, we need a lot less of the passive tolerance of recent years and a much more active, muscular liberalism. A passively tolerant society says to its citizens, as long as you obey the law we will just leave you alone. It stands neutral between different values. But I believe a genuinely liberal country does much more; it believes in certain values and actively promotes them [...] It says to its citizens, this is what defines us as a society: to belong here is to believe in these things (Cameron, 2011 quoted in Themelis, 2015: 445).

This discourse of community cohesion has, however, been largely absent in Scotland. With the exception of refugee inclusion, there is no specific policy framework for migrant inclusion in Scotland. Moreover, while the New Labour government was developing the community cohesion framework at the member state level, the Labour led government in Scotland created the Scottish Human Rights Commission and developed the 'One Scotland, Many Cultures' campaign which, in contrast to the approach taken by Westminster, aimed to address long standing complacency about racism within Scotland and build on existing UK equalities and anti-discrimination legislation (Hepburn, 2014). Hepburn (2014: 25-26) further notes that while England was 'focused on shared civic values, the race relations equality agenda in Scotland has been focused on combating racism towards ethnic groups and promoting the vision of Scotland as a plural society that is welcoming of different cultures.'

Moreover, government funding for local authorities in both England and Scotland has also fallen since the 2008 financial crisis. Thus Clark (2014a) has suggested that Roma have become a scapegoat for budget cuts within the Govanhill area of Glasgow. However, spending cuts have been less severe in Scotland with English local authorities experiencing 27% real terms cuts compared to 11% in Scotland (Joseph Rowntree Foundation, 2015). Accordingly, the Joseph Rowntree Foundation (2015: 24) notes that: '[i]t is clear that the slower pace and smaller scale of cuts in Scotland can enable more investment in preventative work, with the capacity to generate future savings.' Furthermore, the cuts to local authorities in deprived areas of England were experienced differently than in more affluent areas, with the Joseph Rowntree Foundation (2015: 6) finding that local authorities in deprived areas saw cuts of more than £220 per head, while the least deprived areas experienced cuts of only £40 per head. This has not been the case in Scotland, with the most affluent local authorities experiencing cuts of 5% while the least affluent have experienced cuts of 7% (Joseph Rowntree Foundation, 2015: 6). A consequence of this is that Roma EU citizens' access to statutory services may have differed substantially at the local level. That said, given the endemic discrimination against Roma both historically and in the present day, many Roma continue to see the authorities as

a threat (Council of Europe, 2012: 8) and so, may have been reluctant to engage with services at the local level.

Finally, the Scottish National Party (SNP) have held power in Scotland for 15 years. The SNP are predominantly a nationalist party with the primary aim of securing Scottish independence. Sub-state nationalism represents a powerful force for the decentralisation of social policy (Beland and Lecours, 2007: 405) for two reasons. First, social policy interventions are more likely to affect the everyday lives of citizens and so, nationalistic governments can establish direct and tangible links with the population (Beland and Lecours, 2007). Second, discussion around specific social policy alternatives can be conducted as a debate over core values, principles and identities (Beland and Lecours, 2007). Accordingly, in 2018, the Scottish government introduced landmark social security legislation based on the principles of 'dignity, fairness and respect' for human rights in the delivery of 11 benefits. However, at the time of the fieldwork (see Chapter 2), the Social Security (Scotland) Bill had not been implemented (see Conclusion). That said, when compared to England, there were still some differences in the social rights that EU citizens resident in Scotland could claim. For example, Scotland offers more generous provision than the rest of the UK for student support, elderly care and health care and implemented discretionary crisis grants, community care grants and discretionary housing payments following the introduction of Westminster's Welfare Reform Act 2012 (see Chapter 1). Moreover, while labour market activation policies are UK based, the Scottish administration has authority over issues such as training and education (see Chapter 1). As a result, the Scottish government has developed a range of policy interventions which aim to improve the access of unemployed, marginalised and excluded groups to the paid labour market (see Scott, 2006).

In a multi-level state such as the UK, national location (whether Scotland or England) matters for migrants, including Roma EU citizens. Those resident in Scotland encountered different labour market opportunities; a differing approach to migrant inclusion; access to more generous social

provisions and access to additional training and support services that were designed to improve the labour market participation of disadvantaged groups. That said, there were also differences between the opportunities that were available to Roma EU citizens at the local city level.

Section 5: Opportunities for Roma EU Citizens in Sheffield and Glasgow

This section will outline the opportunities that may have been available to Roma EU citizens resident in Sheffield and Glasgow. Sheffield and Glasgow are former industrial cities which have undergone profound transformations in the last half century. In common with the experiences of other former industrial cities, there has been a marked shift from manufacturing towards a service based economy in both cities (see Helms and Cumbers, 2008; Thomas *et al.*, 2021). As such, there are some similarities between the two cities. For example, both cities have seen a reduction in the number of full-time employment opportunities available, alongside a proliferation in the number of part-time jobs available (Helms and Cumbers, 2008; Thomas *et al.*, 2021).

Nonetheless, there are also some key differences between the economic opportunities that may be available to Roma at the local level. For example, job density – i.e. the number of jobs divided by the working age (16-64) population resident in a particular area - in Sheffield has fallen significantly since 2008 and by 2020 was well below the national average (Thomas *et al.*, 2021). Job density in Glasgow, by contrast, is above the Scottish average (The Glasgow Centre for Population Health, n/d). There may therefore be greater demand for migrant labour in Glasgow with the The Glasgow Centre for Population Health *et al.* (n/d), for example, reporting that 18% of workers who are engaged in the paid labour market in Glasgow are migrants.

In addition, there are differences not only in the local governance structures in Sheffield and Glasgow but also in the governance structures that have existed over time. In Scotland, all local authorities have been unitary councils since the 1990s. Prior to 2014, South Yorkshire had four unitary councils (Sheffield, Barnsley, Doncaster and Rotherham); thereafter, the Sheffield City Region Authority, which includes Sheffield, Barnsley, Doncaster and Rotherham as full members and Bolsover, Chesterfield,

Derbyshire Dales and Northeast Derbyshire as associate members, was established. Thus the devolution of powers to the local level (see Chapter 1) changed not only the services that Roma EU citizens could access but also the availability of these services over time in Sheffield. For example, in the UK all jobseekers, including UK nationals, are required, under the threat of benefits sanctions, to engage in and document up to thirty-five hours of job seeking activity and training per week to retain eligibility to their benefit. Roma EU citizens' access to services was often limited (Scullion and Morris, 2009a; 2009b) with language barriers, for example, meaning that it was difficult for migrants to understand the work search and training requirements inherent in a claim for out of work benefits in the UK (Dwyer *et al.*, 2016). However, in 2013, the Westminster government announced a new policy of mandating new JSA claimants with low levels of English language to attend English for Speakers of Other Languages (ESOL) classes in order to receive their benefit during the first six months of their claim (see Association of Colleges, 2014). Additional funding was allocated by the government for people with ESOL needs in England to access ESOL classes within six months of commencing their claim with this funding being routed through the Skills Funding Agency (Association of Colleges, 2014). The Sheffield City Region Devolution Agreement included an agreement for the combined authority to form a joint partnership with the Skills Funding Agency to re-commission adult skills. Accordingly, there is evidence to suggest that some Roma EU citizens resident in Sheffield may have been engaging with the Department of Work and Pensions (DWP) as EU Jobseekers in the 2011 to 2014 period with the Association of Colleges (2014: 34 – parenthesis in the original), for example, noting that:

JCP [JobCentre Plus] was identifying places where there was a need for ESOL Plus funding, but no provision had been allocated and noted that Sheffield, for example, was already up to capacity [...] There were, for example, increasing numbers from the Roma community around the country (which allied with providers' perceptions).

Finally, whilst Roma often use informal networks of support to apply for benefits in the UK (Greenfields and Dagilyte, 2018; see also Rolfe and Metcalf, 2009; Scullion and Morris, 2009a; 2009b), there are also differences in initiatives aimed at Roma inclusion at the local level. Although both Sheffield and Glasgow received substantial funding for projects that sought to promote Roma inclusion (see Morris, 2016), the distribution of these funds and their utilisation differed at the local level. As a result, while both Sheffield Council and Glasgow City Council can be seen to have benefited from the EU's Fundamental Rights and Citizenship Programme funding, the concentration of funding would have differed significantly at the local level with funds accessed by Migration Yorkshire being distributed across the entirety of South Yorkshire. In contrast, funds in Glasgow were predominantly targeted at the Govanhill area of the city.

The ways in which these funds were spent also differed at the local level. Migration Yorkshire opted to focus on women's health, training on redress and reporting, networking, the production of a range of resources and a Roma mentoring programme, in collaboration with local authorities, during the Roma Matrix Programme (see Migration Yorkshire, 2020). In contrast, Glasgow City Council chose to focus on employability support. For example, they developed a scheme to provide mentoring opportunities for Roma people with public authorities in order to connect Roma communities with public services (Glasgow Roma-Net, 2013). Moreover, Jobs and Business Gateway - one of Glasgow City Council's external partners - received funding from the European Social Fund in order to provide employability support to Roma (see Social Marketing Gateway, 2013; Morris, 2016). The aim of this employability programme was to improve the quality of life of participants by providing pre-employment training to improve understanding of the labour market, followed by on the job training and employment support to develop horticultural and landscaping skills (Social Marketing Gateway, 2013:19). And finally, Glasgow City Council opted to implement an awareness raising project to educate public sector employees and improve understanding of issues affecting Roma people (Social Marketing Gateway, 2013).

Therefore, there are differences between the approaches taken in Sheffield and Glasgow with projects aimed at Roma inclusion in Sheffield, for example, being predominantly concerned with Roma health and redress, and projects in Glasgow being predominantly focused on Roma inclusion in the paid labour market. That being said, there were of course also some similarities with both cities, for example, opting to implement Roma mentoring programmes. Mentoring programmes aim not only to provide individual employment opportunities for those Roma who are engaged in them but also to enhance the engagement of the Roma community with service providers (Brown *et al.*, 2015).

The impact of Roma mediators however has been criticised as they are often disregarded by more powerful policy actors at the local level (Brown, *et al.*, 2015). In this regard, the differences in the approaches taken in Sheffield and Glasgow may have been important. Relations between Roma and non Roma communities typically play out across a spectrum that ranges from indifferent ambivalence to overt hostility and violence (Brown *et al.*, 2015: 10). However, the Glasgow City Council's awareness raising project aimed to improve understanding and challenge stereotypes and so change individual and institutional views and stigma towards Roma (Social Marketing Gateway, 2013). This may go some way to explaining why services in Glasgow have been identified as an example of good practice when it comes to the inclusion of Roma EU citizens, while services in Sheffield have been criticised because they, and their staff, have not adapted to the needs of Roma (see Chapter 1).

The local level can have a significant impact upon Roma EU citizens. Similarities and differences in the labour market opportunities available to Roma EU citizens in each city, coupled with different local governance structures, different conditions when accessing EU Jobseekers Status and similarities and differences not only in the initiatives aimed at Roma inclusion but also the quality of those initiatives mean that Roma EU citizens' may have had significantly different experiences depending on whether they chose to settle in Sheffield or Glasgow.

Conclusion

This chapter has presented a 'top-down' evaluation of the opportunities that multi-level citizenship may have presented to Roma EU citizens in the UK (see Chapter 1). The importance of both the labour market structure and the structure of the welfare system in the UK have been highlighted as key factors that may have driven Roma free movement to the UK. It is important to stress, however, that the economic opportunities available to Roma would also have varied over time with low-paid employment opportunities in the UK becoming more precarious post-2008 and 'atypical' employment becoming increasingly normalised (see Clarke and Cominetti, 2019). This proliferation of 'atypical' employment would have made it easier for Roma EU citizens to access paid employment in the UK and subsequently may have led to increased numbers of Roma EU citizens opting to migrate to the UK post-2008. It would also, however, have made Roma EU citizens more reliant upon social benefits with social assistance provisions, for example, being designed to support those who are on a low income (Nagy, 2016b).

That said, the impact of the 2008 financial crisis may not have been as severe for those who were engaged in picking, packing and food processing roles in the UK because while 'atypical' employment contracts are the norm within the food processing sector, only 8% of workers who work in these roles work less than full-time hours (BRES, 2018 cited in Webb *et al.*, 2018). In this regard, those Roma who settled in either Sheffield or Glasgow because they could access food processing roles in those locales may not have been significantly impacted by the 2014 reforms to the rights of EU citizens because their employment networks were located in less precarious sectors of the paid labour market (see Massey, 1990).

Moreover, the ability of Roma EU citizens to access economic opportunities in the UK would also have been dependent upon the economic opportunities available to them at the local level post-2008. In this regard, the differences in factors such as job density, differential conditions when accessing EU Jobseekers Status and differences in both the initiatives and quality of the initiatives

aimed at Roma inclusion at the local level may have meant that Roma EU citizens' experiences of the opportunities created by the legal and policy framework of multi-level citizenship differed significantly in Sheffield and Glasgow.

The 'top-down' approach (see Chapter 2) adopted in this chapter then, has highlighted some of the differences of experience we may expect to see when Roma attempt to access the opportunities inherent within the legal and policy framework of multi-level citizenship. However, in order to ascertain whether Roma EU citizens resident in Sheffield and Glasgow experienced the opportunities presented by multi-level citizenship similarly or differently (see Chapter 1) we need to obtain a clearer understanding from the perspective of Roma and those working with them. Chapter 4, presents the empirical research carried out in this project in order to assess the ways in which the opportunities presented by multi-level EU citizenship have been experienced similarly or differently by migrant Roma in Sheffield and Glasgow (see Chapter 1). In this regard, Chapter 4, is central to our understanding of multi-level citizenship as it presents Roma experiences at the local level and so situates Roma as social actors who are facilitated by structures at the supra-national, member state, national and local levels. Moreover, the use of the abductive research strategy allows us to understand the experiences of Roma in Sheffield and Glasgow with reference to the broader economic, legal and local bureaucratic ('top-down') structures outlined in this chapter (see Chapter 2).

Chapter 4: EU Citizenship as Opportunity II: Experiences of Roma in Sheffield and Glasgow

Having explored the opportunities created by multi-level citizenship for Roma in the UK in general terms (see Chapter 3), this chapter draws on the empirical research conducted during the course of this study in order to assess the ways in which the opportunities presented by multi-level EU citizenship have been experienced similarly or differently by migrant Roma in two different locales: Sheffield and Glasgow (see Chapter 1).

As such, the abductive methodology is central to this chapter. The aim of the abductive research strategy is to uncover the mutual knowledge, symbolic meanings, intentions and rules that provide direction to the everyday lives of the research participants (see Chapter 2). In this respect, the abductive research strategy perceives the accounts of social actors to contain the concepts that research participants use to structure their world and the theories that they use to account for what goes on in their social world (Blaikie, 2007). However, the abductive research strategy goes beyond a 'bottom-up' account of research participants' social worlds in that it seeks to develop social scientific concepts and theories from these lay accounts (see Chapter 2). Therefore, the 'top-down' account of the opportunities created by multilevel citizenship for migrant Roma in the UK presented in the previous chapter (see Chapter 3) included references to structures and processes of which research participants may not necessarily be aware (see Chapter 2). It is in moving between these 'top-down' and 'bottom-up' accounts that the process of abduction is applied (Blaikie, 2007: 90).

The chapter proceeds as follows. Section 1 gives an overview of Roma EU citizens' reasons for their free movement to the UK and their settlement patterns at the local level. Section 2 presents the similarities in Roma EU citizens' experiences in Sheffield and Glasgow. Section 3 is concerned with the different ways in which Roma EU citizens experienced the opportunities inherent in multi-level citizenship in Sheffield and Glasgow. And finally, Section 4 assesses the opportunities presented for Roma by different policies of inclusion in Sheffield and Glasgow. The chapter concludes by reiterating the key points raised.

Section 1: Roma in Sheffield and Glasgow

This section presents an overview of the reasons given by Roma for their free movement to the UK and their settlement in either Sheffield or Glasgow. Given the endemic discrimination that Roma experience in their countries of origin (see Chapter 3), several Roma respondents viewed free movement as an opportunity to escape prejudice and persecution (see Chapter 1):

My parents decided to move to the UK to prevent poverty, to escape racism, discrimination, hate crime, bullying by skin heads and there were a few times rape. Basically, when they found out that we're Roma and where we live, they came and they burned the flat, we had to escape from the windows, jump out in the middle of the night and find a place to live again. So, we were running about because we're Roma. We tried to live in different places, trying to settle but they would say 'no you belong in the village, in the ghettos, in segregation, you move there'. So, that's the reason why my Dad and Mum decided to move to England (SR03: Slovak Roma, Male, 26)

Discrimination in CEE countries also had an impact on Roma EU citizens' ability to access the paid labour market and so, for the majority of respondents, an inability to access the paid labour market, and in particular the formal paid labour market in the CEE region, had been central to their decision to engage in free movement:

It was very difficult for my father to get work because he did not have any qualifications, he did not have a certificate of qualification and it made it difficult because whenever he applied for work, they said, 'oh you are Roma and you're unqualified, we don't want you' and it was very hard to live on social benefits only (GR05: Slovak Roma, Female, 29)

I was a labourer, I was working the land for people, go and dig the land or harvest. I wasn't employed, it was like, you know, finding work on a daily basis from other people in the village (GR12: Romanian Roma, Female, 47)

As EU citizens, Roma were able to choose to which EU member state they wished to migrate. However, for the majority of Roma respondents, the UK was their preferred destination. The reasons why Roma had chosen to move to the UK varied somewhat with some respondents noting that they had either seen television programmes or heard from friends and family that discrimination was lower in the UK:

We heard it from different sources that life in the UK is better. We saw it on TV, we heard it from people who were living here and came back to visit, we heard that they make no differences between people in terms of nationality, and it is true that people of different nationalities have equal access to work here. (GR03: Slovak Roma, Female, 55)

As the above quote makes clear, lower levels of discrimination and the easier access to the paid labour market that this granted were key factors that influenced the migratory decisions of an overwhelming majority of Roma respondents included in the research (see Chapter 3):

Mainly because of work, it was very difficult to find work in Slovakia. It might have changed over the years I've been here, but work was the main reason. (GR06: Slovak Roma, Female, 42)

We weren't managing well in Romania and noticed that wages are better here. (GR14: Romanian Roma, Female, 20)

As a result of the endemic discrimination towards Roma in CEE countries, a small number of Slovak and Czech Roma refugees had sought asylum in the UK prior to the 2004 'big bang' enlargement (see Chapter 1). Some of these Roma refugees and asylum seekers had been housed in Sheffield and

Glasgow (see Chapter 1). Consequently, the settlement patterns of Roma EU citizens post-2004 have been linked to the existence of wider family networks (i.e. chain migration) and access to affordable housing at the local level (see Chapter 3). Nevertheless, the Roma populations in Sheffield and Glasgow are not homogenous. In Sheffield, the Roma population is predominantly Slovak but does also include a small number of Czech and Romanian Roma (see Chapter 1). The Slovak Roma population can in effect be split into three groups - those who engaged in family reunification following the 2004 enlargement; a larger group of Roma from urban areas of Slovakia who had no pre-existing relationship with Sheffield; and a smaller group of Roma who again had no pre-existing relationship with Sheffield but who had migrated from rural areas of Slovakia (see Table 2: Roma Settlement in Sheffield and Glasgow). As a key policy stakeholder respondent explained:

Our first wave after the rules changed, so after 2004 not a lot happened, a few came and then like I said, 2009/10 a wave of migration came from those northern villages of Slovakia, and they were mainly urban Roma. So, from the big towns and villages. What happened more recently, 2013 onwards, we had more rural Roma. (SKPS06: Community Services Manager, Female).

In Glasgow, the Roma population in Glasgow is predominantly Slovak and Romanian but also includes a small number of Czech Roma (see Chapter 1). The Slovak Roma population in Glasgow originates from villages and small towns in Eastern Slovakia – predominantly Pavlovce in the Michalovce region, while the Romanian Roma population came from the Bihor province and Arad City in Western Romania (see Table 2: Roma Settlement in Sheffield and Glasgow).

Table 2: Roma settlement in Sheffield and Glasgow

Sheffield	Glasgow
1990s: Slovak and Czech Roma refugees and asylum seekers	1990s: Slovak and Czech Roma refugees and asylum seekers
2004: Slovak Roma (chain migration)	2004: Roma from Eastern Slovakia (chain migration)
2009/10: Roma from urban areas in Northern Slovakia	2007/08: Romanian Roma population from the Bihor province and Arad City in Western Romania
2013: Roma from rural areas of Slovakia	2014: Romanian Roma settlement continued

Table 2: Roma Settlement in Sheffield and Glasgow (Sources: interview transcripts, Social Marketing Gateway, 2013; Zabiega, 2013; Migration Yorkshire, 2018a)

Key policy stakeholder respondents in both locales considered there to be significant differences between established Roma groups and more newly arrived Roma groups:

I'm summarising this, we got Roma from different places so much more rural smaller villages, I don't even know what to call it, shack town but, you know, little settlements, they're very different – harder to integrate, very poor English, lack of understanding of systems, education, health, waste, whatever, housing, because it's a different client group (SKPS06: Community Services Manager, Female).

I don't think on a fundamental level there's any real difference between Slovakian Roma and Romanian Roma like when they first arrive but I just think that we're not seeing new arrivals in the Slovakian community particularly so, you know, it's like that

community is fairly static and settled and within the Romanian community there's a real spectrum which is not I wouldn't say a full kind of spectrum of being fully integrated, you know, so you've got people that are coming who are just almost at the lowest levels in terms of their ability to get jobs, their ability to speak English, you know, they're living in the worst housing, they're not accessing services (KPSG02: Community Worker, Male)

However, key policy stakeholder respondents rarely had any clear sense of why additional groups of Roma had settled at the local level (see also Brown, Martin and Scullion, 2013). As a result, Roma EU citizens were asked why they had settled in Sheffield or Glasgow: the vast majority of Roma respondents linked their settlement decisions to having members of a wider family and/or friend network present in the area (see Chapter 3):

So usually they already have family here, somebody over here, the families try to get them into the factory jobs, so they get them the national insurance number and everything and then through friends they get into the factory jobs (SR01: Czech Roma; Female; 33)

10 years ago, me and my wife decided to move here and my brother, he came here a year before us, and he worked as a bus driver on the bus that is taking people from here to Vital Recruitment company – that's a potato factory. So, he took us, me and my wife to the factory and we started working there. (GR04: Slovak Roma, Male, 54)

There were however a small number of first wave migrants included in the sample which informs this research. All first wave Roma migrants and a small number of key policy stakeholder respondents, noted that they had settled in either Sheffield or Glasgow because they found access to the paid labour market in those locales:

I don't really know why Sheffield, we just moved here and then there was jobs for us.

(SR14: Slovakian; Roma; Male; 55)

We came [to Glasgow] with intentions that work wise it's better here (GR02: Slovak Roma, Female, 35).

It seems like the main driver around most of their settlement in the UK, at least in first few months, maybe years, is around where they're going to get the best chance of employment really, linked to kinship and family. (SKPS09: Researcher, Male)

The settlement patterns of first wave Roma EU citizens thus appeared to be related to the employment opportunities that were available to them at the local level. However, the concentration of Roma EU citizens differed quite significantly at the local level with the Page Hall/Fir Vale districts in Sheffield having the highest concentration of Roma EU citizens (Sheffield City Council, 2015), but with Roma also settling in the Darnell and Firth Park areas of the city (Migration Yorkshire, 2018a). In contrast, 90% of Scotland's Roma population is located within the Govanhill area of Glasgow (Community Infosource, 2016), or in other words, within a one-mile radius (see Chapter 3).

Section 2: Similarities in Roma Experiences of Opportunities in Sheffield and Glasgow

This section is concerned with the similarities between the ways in which Roma EU citizens experienced the opportunities inherent within EU citizenship in Sheffield and Glasgow. A majority of Roma respondents noted that their free movement had been an emancipatory experience not only because it had permitted them access to employment in the UK (see Chapter 3) but also because it had permitted them access to higher status forms of employment in the UK:

[M]y country, for example, if I want to start in the factory picking, packing in Slovakia people ask me about education. This country no need education (SR07: Slovakian; Roma; Male; 47)

Excellent, excellent job [in a food processing factory], excellent people. I have never had a better work before [...] When I used to work in Czech Republic in the railways it was kind of difficult work. This is finer work and I have time to speak with people and we have, you know, fun discussing things and the only drawback is that most of my colleagues are Polish, so I speak better Polish than English. (GR09: Slovak Roma, Male, 34)

What I like about UK is that they don't care as much about [...] how much study you've done or how much qualification you have [...] whereas in Czech Republic it's all the other way around [...] in Czech you need papers to be a cleaner (SR01: Czech Roma, Female, 33)

Thus the majority of Roma respondents were found to be engaged in low-paid and precarious picking, packing and food processing roles in the UK (see Chapter 3). Nevertheless, some Roma in both cities were also found to be employed in local work in support of the broader Roma communities (see Chapter 3): this work sought to ease the considerable pressure that was placed on local organisations by the arrival of new Roma groups. Indeed, several key policy stakeholders in both locales noted the complexity of needs within the Roma community. To address this issue, a number of specific roles were created in order to facilitate communication between Roma communities and service providers at the local level (see Chapter 3) (see also Brown *et al.*, 2015). Roma EU citizens who held these intermediary roles had more advanced English language skills and often had significantly higher levels of education than other Roma respondents (see Brown *et al.*, 2015). As such, these Roma respondents were often perceived by key policy stakeholder respondents to be 'Roma Role Models' (Brown *et al.*, 2015), particularly if they were Romanian and female:

The younger generation I see coming through now who have gone through it and have got themselves into university, gone to college that's great to see so there's more female role models coming through now as the generations come through. You

don't have to do that, you can get a good job, have families. We have a lady called [person's name] who works here with us at the council [...] So for each child she's going back to work, she's coming back and that's great to see, she's very ambitious so that's lovely to see. The female role models are appearing so talk about 10 years ago that was never there, female Roma would be at home looking after kids and then looking after the family home so there's been a big shift going off. (SKPS06: Community Services Manager, Female).

[A]t the other end of the spectrum you've got Romanian individuals like [person's name] who works with [local organisation] and who volunteers with [local organisation] who, you know, you know her she's been through a lot of education, has settled here [...] you know, she's really well established and she's somebody who could move quite easily into a good job, she's very exceptional so you've got like people here, they're at the beginning of the journey, I hate that expression, and others who are kind of almost there, you know, but I think within the Romanian community the ones who are kind of almost there are so few, whereas within the Slovakian community it's almost the norm, you know, like you're much more settled, you've got a job, you've maybe got a better housing situation, you're much more economically viable, you know. (GKPS02: Community Worker, Male).

However, these intermediary roles were offered on a part-time basis and/or on 'Roma projects' which had short-term funding (Migration Yorkshire, 2018a) and so those Roma EU citizens who held these roles were also found to be engaged in precarious employment. As both a Roma respondent and key policy stakeholder respondent noted:

In my job [...] I've worked for 5 years but they've never given me a permanent contract, every year they extend it (SR04: Romanian Roma, Female, 30)

For those Roma who are more sort of professionals, they certainly talked about feeling like they were on non-permanent contracts which they felt was unfair compared to their peers. I don't know how much that is really the case because a lot of people enter on temporary contracts into this kind of work. (SKPS04: Policy and Research Manager, Female)

A number of Roma respondents who held intermediary roles also worked as self-employed interpreters and/or were engaged in Higher Education in the UK. While these Roma EU citizens were able to utilise their language skills in order to set up their own businesses or engage in education and so, substitute the income that they received from their intermediary roles, it is important to remember the endemic discrimination experienced by Roma when engaged in education in their countries of origin (see Chapter 3). As such, the labour market opportunities available to Roma EU citizens in the UK were often limited (Rutter, 2015; Dinu and Scullion, 2019) by extant low levels of education and at times illiteracy, as well as language barriers (see Chapter 3). As several Roma respondents noted:

I find it easier to find work here, for me if I was to speak English better and even learn how to read and write in English, I feel that I would find a much better job easier.
(GR12: Romanian Roma, Female, 47).

The respondent quoted above was found to be working as a Big Issue seller at the time of interview, however she was the only respondent who was engaged in self-employment as her primary means of employment.

Thus all Roma EU citizens who were engaged in the paid labour market at the time of interview (see Chapter 6) were found to be engaged in low-paid and precarious forms of employment in the UK (see Chapter 3). Nonetheless, there were differences between the free movement of non-Roma CEE EU citizens and the free movement of Roma EU citizens (see Chapter 3). Non-Roma CEE EU citizens tended to perceive their free movement to be temporary at the outset (see Chapter 3). In contrast,

the vast majority of Roma EU citizens engaged in this research tended to perceive their free movement to be permanent and so they wanted their families to be with them:

So around January/February 2012 was when I lost the work in Czech Republic and around May time 2012, I was coming here and we discussed with my brother how things could be and whether it was worth it and he said 'definitely come, I will find a job for you here' and I also discussed it with my wife, that if I went, it would be all of us as a family, that it would not be like myself just going to Czech Republic to work and being on my own and them being in Slovakia, so we all came in May 2012. (GR09: Slovak Roma, Male, 34)

Roma participation in free movement was often conducted not only to permit them access to the paid labour market but also, through this engagement in the paid labour market, to provide a better life for their children (see Chapter 3). As several Roma respondents noted:

I would say in terms of children, here the children have access to healthcare for free, they can have medication for free, there is so much done for them. My daughters are in the schools, my older daughter now attends secondary school and education is very important for them [...] I appreciate every single thing, the way my children, what they can afford here and what I can afford to provide for them. I would never be able to provide for them if we lived in Slovakia. (GR09: Slovak Roma, Male, 34)

To further improve the quality of life that they were able to provide for their children, access to in-work benefits were found to be of particular importance to Roma EU citizens (see Chapter 3). As a number of Roma respondents explained:

I'm working 2 hours a day and I get like £500. In order to get those 500 euros in Slovakia, it would have to be like maybe over 12 hours per day for a whole month to get the same money I get here for 2 hours per day. (SR11: Slovakia Roma; Female; 36)

I'm thinking that, you know, they will not throw us out of the UK [when the UK leaves the EU] but what they can do is stop the Tax Credit and all these other benefits like Child Benefit [...] It would be very difficult because the children need food, school, bus, clothes and all the money would go on that and we would not have enough money to pay rent. (SR09: Slovak Roma, Male, 37)

The combination of the UK's liberal market economy and liberal welfare system, therefore, meant that Roma EU citizens could access economic opportunities as EU workers in the UK post-2004 and so, provide a better life for their children (see Chapter 3). Nevertheless, as I shall now move on to discuss, the ways in which Roma experienced the paid labour market were found to differ at the local level.

Section 3: Differences in Roma Experiences of Opportunities in Sheffield and Glasgow

This section will address the different ways in which Roma experienced the opportunities presented by multi-level citizenship in Sheffield and Glasgow. In Glasgow, Roma respondents noted not only that it was easier to access the paid labour market in the UK than it had been in their countries of origin but also that it was easier to access employment in Glasgow than it had been in other parts of the UK (Martin *et al.*, 2017). As several Roma respondents explained:

It's easier to arrange things and to get things done here than in London, in London you have to wait for a longer time, it takes longer to get work and go through all the procedures. (GR02: Slovak Roma, Female, 35)

However, Roma in Sheffield noted that while they had previously found it easy to access the paid labour market, in recent years this had become increasingly difficult:

[A] lot of them still live on benefits. Not because they want to but because it's difficult for them [...] I mean look at the 2004, 5, 6, 7, 8, even 9. A lot of them were in employment, lot of them were working. After 2010, 11 everything slowed down

because of the factories, the bakeries moved to locations like the Prime Recruitment sausage factory [...] the ones who employ all Roma [...] When they moved to different locations then they could not work because it's far away. (SR03: Slovak Roma, Male, 27)

In 2011, the largest employer of Roma in Sheffield - Vion Sausage factory - relocated from Sheffield to Broxburn in Scotland (see Holter, 2011). The closure of this factory would have had a significant impact on the ability of Roma EU citizens resident in Sheffield to access employment at the local level as food processing roles tend to be concentrated within a few large employers at that level (Scott and Brindley, 2012). Regardless, a number of employers were still offering low-paid employment in Sheffield. As a key policy stakeholder noted:

[B]ecause of where they're located in Sheffield [...] they're sat very close to some of the [...] big employers, manufacturing and a steel works is still going around in Sheffield and there's a massive sorting office for the post office on Brightside Lane, there's also a big distribution plant for Morrison's home shopping right at the end of the estate so we know that's where people get employed, we know there's plenty of work out there for people (SKPS06: Community Services Manager, Female).

Although Roma had attempted to access employment through these other employers, they had been largely unsuccessful as in recent years these employers had required their employees to pass an English language proficiency test. As several respondents explained:

When I came it was easier to get factory jobs 'cos the English people didn't want the jobs so it was easier for them to get there and it was less barriers as well, you have to do the tests [...] there are certain agencies, people tell you where to go, you register [...] you're on the list, they'll probably never get to you and if they do you have these tests, you know, English, whatever, and then it's all zero hours space. (SR01: Czech Roma, Female, 33)

[S]ome companies were introducing, allegedly under health and safety requirement that you have got to sign a form saying that your English is of a standard to be able to understand safety instructions and supervisory instructions – it was felt that that was sometimes used as a way of getting rid of Roma where they decided that they no longer wanted so many Roma to be working. (SKPS02: Policy and Information Worker, Male)

It is clear, therefore, that different barriers were experienced by Roma when they attempted to access employment at the local level. In Glasgow, employers facilitated Roma EU citizens' engagement in the paid labour market by providing bus services from their places of residence to their place of employment. As both Roma and key policy stakeholder respondents noted:

[I]t was great, the bus came and collected us here in Govanhill and took us there [to our place of employment] and we were back after lunch. (GR05: Slovak Roma, Female, 29)

There's 3 or 4 pickups a day. So, it allows people to be flexible. There's a bit of flexibility attached so that people can actually work in the evenings after the partner comes home to look after the kids, somebody can be go out and do some work, you know, so there's pickups later on till the middle of the night and things like that (KPSG07: Roma Inclusion Specialist, Female)

In contrast, in Sheffield both Roma and key policy stakeholder respondents noted that Roma EU citizens regularly had to travel outside of the city to access employment. As a result, access to transportation was a particular problem for Roma EU citizens in the city:

Transport – the endless problems of row about people meeting at 4.30 in the morning outside someone's house waiting for them to get up because there are five people

waiting for the car to go to Doncaster and therefore everyone in the street is getting woken up at 4.30. (KPSS02: Policy and Information Worker, Male)

I've registered with people so then we can be more people, people who drive and sit in one car (SR11: Slovak Roma, Female, 36)

Moreover, there were also differences in the types of employment that Roma were engaged in at the local level. The lack of labour market enforcement in the UK, alongside restrictive legislation in relation to the employment of irregular migrants from 2004 onwards, has meant that it is more beneficial for employers who wish to engage migrants in the grey labour market in the UK to employ EU citizens as they have a legal right to work in the UK (see Chapter 3). However, while key policy stakeholders in Sheffield were concerned that Roma were engaging in the grey labour market, a small number of key policy stakeholder respondents in Sheffield also noted that many of the employers who had previously offered Roma employment in the grey labour market had closed down in recent years:

Originally it was around field work as I call it, farming work, it was around the infamous car washes, see I don't want to stereotype because a lot of Eastern Europeans, not just Roma go to car washes. Car washes sprang up and then the scrap metal or scrap anything, vans, they're not around so much now you see 'cos that's how it all changing, originally you would go 'oh the scrap metal' , some of them now are becoming taxi drivers or drivers for all sorts of different things, it's changing, I think it's changing as people integrate more (SKPS06: Community Services Manager, Female)

In contrast, Roma engagement in the grey labour market was an overwhelming theme in Glasgow with all key policy stakeholder respondents stating that Roma EU citizens, in particular Romanian Roma, were often engaged in the grey labour market (see Chapter 3):

[P]eople at least are able to get work here but by no means is the work that they have access to in Glasgow, you know, what we want it to be, people are happy to get paid like £4 an hour but that's not nearly enough. (GKPS10: Development Worker, Female)

[W]hen you're saying 'paid work' well being paid below the minimum wage is fairly standard for people from the Roma community and there's quite prolific exploiters, they know how to do this very, very well (GKPS13: Social Welfare Lawyer, Female)

[T]here's a huge amount of exploitation, you know, in terms of landlords maybe becoming employers as well and coming to some kind of deal about rent or, you know, so then people are in this really precarious position where they're not they're maybe sort of working for rent or working for part rent but they've been expected to work huge hours and therefore are getting equivalent of like a pound an hour or something like that. There are people who are literally getting paid a pound an hour or two pounds an hour for fairly tough manual work as well, so the kind of employment opportunities just aren't really there and the ability for people to get themselves jobs are really limited. (GKPS02: Community Worker, Male).

Those Roma EU citizens who were engaged in the grey labour market in Glasgow tended to be employed in car washes (Humphris, 2017; Nagy, 2018) and small local businesses such as restaurants and takeaways. These jobs are similar to the roles offered in the agricultural sector in the UK (see Chapter 3) in that they are very physically demanding and often pay below the minimum wage (see Scott, Craig and Geddes, 2012; Director of Labour Market Enforcement, 2020). However, they also differ from jobs in the agricultural sector in three key ways. First, they are not seasonal positions (see Scott, Craig and Geddes, 2012; Director of Labour Market Enforcement, 2020). Second, they are located often in urban areas (see Scott, Craig and Geddes, 2012; Director of Labour Market Enforcement, 2020). And finally, the use of self-employed workers is common in restaurants and takeaways and car washes (see Scott, Craig and Geddes, 2012; Director of Labour Market

Enforcement, 2020). Therefore, while the 2008 financial crisis may not have an impact on Roma EU citizens' access to the paid labour market in Glasgow, it may have had an impact on the forms of employment that they were engaged in at the local level (see Chapter 3).

It appears then, that Roma EU citizens' experiences of the paid labour market both varied at the local level and also changed over time in Sheffield on account not only of the closure of the Vion Sausage factory but also the increasingly stringent demands of other large employers with regards to English language proficiency. These differences were most likely related to the differences in job density at the local level: in Glasgow, this is above the Scottish average, whilst in Sheffield it is significantly below the national average (see Chapter 3). The 2008 financial crisis, therefore, may have had a more significant impact on Roma resident in Sheffield than Roma resident in Glasgow. That said, whilst the proliferation of 'atypical' employment that followed the 2008 financial crisis would have made it easier for Roma EU citizens to access the paid labour market in the UK, there was also a rise in grey labour market employment (see Chapter 3). Glasgow is interesting in this respect as a large Romanian Roma population settled in the city following the 2007 enlargement (see Social Marketing Gateway, 2013). Newly arrived migrants are more likely than British citizens and established migrant groups to engage in grey labour market employment because they tend to have limited English language skills, a limited understanding of the paid labour market in their host country and lower subjective expectations (see Chapter 3). Therefore, while the financial crisis may not have had an impact on Roma EU citizens' access to the paid labour market in Glasgow, it may have had an impact on the type of employment that was available to Roma at the local level. As Morris (2014: 4; see also Martin *et al.*, 2017) notes: 'the evidence from Glasgow suggests that Roma often work in unregulated sectors of the economy, taking temporary jobs through non-statutory employment agencies, with very low wages, illegal deductions and poor working conditions.'

Section 4: Variable Inclusion Policies in Sheffield and Glasgow

We have considered above the similarities and differences in the ways in which Roma EU citizens experienced the opportunities inherent within multi-level citizenship in Sheffield and Glasgow, but we have not as yet assessed the opportunities presented by differing inclusion policies in Sheffield and Glasgow. Given the endemic discrimination against Roma both historically and in the present, many Roma continue to see the authorities as a threat (see Chapter 3). However, following the 2008 financial crisis, social assistance provisions would have been of particular importance to Roma EU citizens because not only are they designed to support those who are in low-paid work but they are arguably also designed to support workers to enter the paid labour market (see Chapter 3). As a Roma respondent explained:

[I]t was a difficult period of time then [when I arrived in Glasgow]. So, I got help from some friends who lived here and they told me not to be afraid, just to be brave and apply and they will help me and that's how I did it [...] It was easy, it was straightforward [...] I went to a local office [charity] that was open in the area here (GR12: Romanian Roma, female, 47).

Thus, in both cities opportunities may also have emerged in relation to community-based services. Such services, located in areas with the highest concentration of Roma, were often the first point of call for newly arrived Roma (Migration Yorkshire, 2018b; Social Marketing Gateway, 2013). However, Sheffield and Glasgow have taken different approaches to Roma inclusion (see Chapter 3) and so, there were significant differences in Roma EU citizens' engagement with local services. In Sheffield, Roma tended primarily to turn to family and friends to aid their engagement:

It was difficult in terms of language, speaking and also filling form and it was kind of more difficult because it was kind of very confidential, so I found somebody in my family who I can rely on and speaks English to help me (SR14: Slovak Roma, Male; 55)

In contrast, Roma EU citizens in Glasgow were not only found to be actively engaging with services (see Chapter 3) on account of the provision of interpreters but a number of Roma respondents noted that their lives had improved as a result of their access to services at the local level:

Four years of being here, I got used to it and I feel like I belong despite the fact that language is still a problem, we are lucky that we have many interpreters everywhere [...] I lived in France and in Spain before, Hungary, but what I like about being here is the fact we have interpreters. [...] the only difference was that we were not physically in Romania, but it is like we were, seriously, it's good. (GR10: Romanian Roma, Female, 27)

I moved here for a better life. Life is better here we've got good access to doctors, there no discrimination here, we get help. Get help from every point of view really, Tax Credits being an example. I got help in my case for the Housing Benefit application. (GR12: Romanian Roma, Female, 47).

Knowledge of access to services in Glasgow may have been acting as a 'magnet' drawing Roma EU citizens to the city (Social Marketing Gateway, 2013: 31). As a key policy stakeholder respondent in Glasgow noted (see also Chapter 3):

Lots of them came from other countries in Europe, I mean the highest number of Romanian Romas that moved abroad in the past years I think if I am not wrong were in Spain [...] Italy a lot of them in Italy, Spain, Italy and Germany these are the countries that most of them went to. Ireland as well and they started to come to the UK in large numbers when things didn't work out anymore in these countries after 2008, you know, when the crisis hit hard 'cos I'm thinking Romania joined the EU in 2007, and we barely had any clients at the beginning, you're talking about, don't know, tens of Romas in Govanhill but to go from tens to thousands in ten years I mean that's huge. (GKPS14: Sessional Worker, Female).

The link between access to services and opportunities for Roma is particularly apparent in relation to the settlement of Romanian Roma in Glasgow, with key policy stakeholder respondents resident in the city noting that in the 2007 to 2014 period (see Chapter 3) much of their time was taken up supporting Romanian Roma EU citizens who were seeking to legalise their status as EU workers:

[M]aintaining records of self-employment was a particular type of drag, you know, and kind of maintaining genuine and effective self-employment has its own kind of significant difficulties for people who can't read or write very well and that's not so much for employment [...] when people came to us looking for support to provide evidence of their self-employment, we can give people template invoices, we could show them how to use a cash book and, you know, and help people do that (GKPS08: Advice Worker, Male).

However, this situation may not have been unique to Glasgow. Between 2011 and 2014, A8 EU citizens resident in the UK could access EU Jobseekers Status (see Chapter 3). The end of the WRS would have been beneficial to A8 Roma for two reasons. First, access to JobCentre Plus support services would have allowed A8 Roma EU citizens to progress in the paid labour market with a Roma respondent in Sheffield noting, for example, that it was engagement with JobCentre Plus that had allowed him to access an intermediary or 'Roma Role Model' (Brown *et al.*, 2015) role at the local level (see Chapter 3):

I remember one day when my personal advisor rang me and said '[Respondent's name] there is a job for you, can you apply?' and it was at [a local school] looking for a Roma teaching assistant. The same day they advertised was the same day I applied and that's when I got the job through the JobCentre. So, the JobCentre helped me change my life. (SR03: Slovak Male, 26).

Second, JSA is designed to facilitate access to the paid labour market and so, the lifting of the restriction on A8 EU citizens' access to EU Jobseekers status would have made access to the UK

easier for Roma who did not have friends or family resident in the UK (see Chapter 3). Moreover, whilst the language barriers that Roma experience in the UK mean that it is often difficult for them to understand the work search and training requirements inherent in a claim for JSA (see Chapter 3), from 2013 onwards, jobseekers who experienced significant language barriers in Sheffield were not required to undertake the usual work search requirements but were instead only required to attend ESOL classes in order to receive their benefits (see Chapter 3). Therefore, it is notable that a group of Roma EU citizens who had no prior connection to Sheffield - Roma from rural areas of Slovakia - decided to settle in the city in that very same year (2013) (Table 2: Roma settlement in Sheffield and Glasgow).

Therefore, the settlement patterns of post-2008 arrivals may have been linked not only to their access to the paid labour market (see Section 1) but also their access to services and, therefore, social assistance provisions. This is particularly apparent in Glasgow with the Social Marketing Gateway (2013: 31) noting that the 'Slovakian population have become quite settled and the Romanians, whose income generation activities take them far afield, still retain an address in Govanhill.' However, the services that Roma could access at the local level differed because services in Sheffield were largely concerned with supporting the existing A8 Roma population, while services in Glasgow aimed to attract new Roma EU citizens to the city (see Chapter 1). As a result, there are two significant differences in the impact of inclusion policies in Sheffield and Glasgow. First, the number of Roma EU citizens who migrated to each city differed quite significantly with Romanian Roma in Glasgow, for example, being a significant Roma group and Roma from rural areas of Slovakia being a minority group in Sheffield. Second, the geographical distribution of Roma differs significantly at the local level with Roma in Sheffield settling in Page Hall, Darnell and Firth Park areas of the city (Migration Yorkshire, 2018a) and 90% of Scotland's Roma population being located within the Govanhill area of Glasgow (Community Infosource, 2016), or in other words, within a one-mile radius (see Chapter 3).

In assessing the opportunities created for Roma by inclusion policies in both Sheffield and Glasgow it becomes apparent that local services not only created opportunities for Roma at the local level but that some opportunities may have been more beneficial to Roma: the differences in both the number and concentration of Roma in Glasgow implies that access to services created a more significant 'pull' factor in Glasgow than it did in Sheffield. In this regard, location can be seen to be of the utmost importance given that Roma in Sheffield and Glasgow not only had very different experiences of accessing services but the services themselves also had a very different impact on the economic opportunities that Roma EU citizens were able to access.

Conclusion

This chapter has adopted a 'bottom-up' approach in order to understand the similarities and differences in the ways in which migrant Roma experienced the opportunities created by multi-level citizenship in Sheffield and Glasgow. The aim when employing the abductive research strategy, however, is to move beyond a 'bottom-up' analysis of Roma EU citizens' everyday experiences to include references to structures and processes of which research participants may not be aware (see Chapter 2). There are two key advantages to this approach. First, it includes the meanings and interpretations that people use in their everyday lives - and elevates them to the central place in social science (see Chapter 2). Second, within the abductive research strategy, theorisation takes place in relation to existing theories and perspectives (see Chapter 2). In this regard, this chapter complements the literature that has engaged with the question of Roma experiences of multi-level citizenship in EU member states (see Chapter 1), focusing on the particularities of the UK context. Moreover, it highlights not only the opportunities that were created for Roma by free movement in general but also, in accord with a 'multi-level' citizenship approach, the similarities and differences in Roma EU citizens' experiences of those opportunities in two local contexts: Sheffield and Glasgow.

The chapter builds on claims in the existing literature, which highlight that Roma EU citizens moved to the UK in order to access the paid labour market (see Chapter 3). Engagement with Roma in the

two cities revealed that free movement to the UK allowed Roma EU citizens to access higher status jobs: for instance, employers in the food processing sector offered less precarious forms of employment than Roma were accustomed to in their 'home' CEE states (see Chapter 3).

More generally, in highlighting the opportunities presented to Roma by differing inclusion policies in Sheffield and Glasgow, this chapter has shown that the local level matters when analysing Roma EU citizens' experiences. For instance, access to services in Glasgow created a more significant 'pull' factor than in Sheffield. This insight is important because if the opportunities presented to Roma differ at the local level, we would also expect Roma EU citizens' experiences of the constraints created by multi-level citizenship to differ at the local level (see Chapter 6).

Having so far concentrated primarily on the opportunities afforded to Roma in the UK by a multi-level EU citizenship, Chapter 5 turns to focus on the constraints of such a citizenship. In particular, it focuses on the legal and policy conditionality that applies to mobile EU citizens at the EU and UK levels from the 'top-down', before turning in Chapter 6 to consider Roma experiences of those constraints from the 'bottom-up' (see Chapter 2).

Chapter 5: EU Citizenship as Constraint I: Roma in the UK

Having explored the opportunities created by the multi-level citizenship framework from both the 'top-down' (see Chapter 3) and the 'bottom-up' (see Chapter 4), this chapter will explore the constraints that multi-level citizenship imposed on migrant Roma in the UK (see Chapter 1) from the 'top-down' (see Chapter 2). The establishment of EU citizenship in 1992, and subsequent case law of the ECJ generated both excitement (Kostakopolou, 2005) and criticism (Delanty, 2007, Menedez, 2010) from academic audiences because some of the ECJ decisions implied that over time the status of European citizens would be dissociated from their engagement in economic activity. From the cosmopolitan perspective (Kostakopolou, 2005), EU citizenship may have been the beginning of post-national citizenship. The critiques of this perspective are two fold. First, it has been suggested that EU citizenship had the potential to undermine national citizenship (see Delanty, 2007). Second, EU citizenship remained a form of market citizenship (see Menedez, 2010). However, since 2010, ECJ case law has made it increasingly permissible for member states to restrict access to social rights for the economically vulnerable. Arising from this, critics have noted the many 'limits and conditions, upon which the not quite so "fundamental" status of Union citizenship continues to be built' (Thym, 2015: 50). As this chapter will show, such 'limits and conditions' fall, in particular, on the most economically vulnerable.

In Chapter 4, it was shown that free movement to the UK offered Roma EU citizens the opportunity to access the paid labour market and so provide a better life for their children. However, all Roma respondents who were engaged in the paid labour market at the time of interview were found to be engaged in precarious forms of employment (see Chapter 4). As such, Roma EU citizens resident in the UK are economically vulnerable and therefore will potentially need to access state support. The limits and conditions inherent to the legal and policy framework of EU citizens then, are of particular importance to Roma not only because they set the framework for Roma EU citizens' access to state support but because they also set the framework that permits or denies Roma EU citizens legal

residence in the UK. This chapter, therefore, outlines the constraints that multi-level citizenship may impose on migrant Roma in the UK (see Chapter 1).

The chapter proceeds as follows. Section 1 is concerned with the constraints that the supra-national framework imposes on EU citizens and notes that ECJ case law has increasingly restricted EU citizens' access to rights. Thus it sets out the key pieces of legislation that govern the residence rights of EU citizens at the EU level and gives a historical overview of the ways in which these have evolved over time. Section 2 outlines the framework at the UK level post-2014 - i.e. the framework that was in place when the fieldwork was completed (see Chapter 2) - and notes that the constraints imposed at the member state level go further than the constraints at the supra-national level. With reference to the existing literature on Roma experiences of the welfare system in the UK (in particular, Nagy, 2016a; Dagilyte and Greenfields, 2015; Dinu and Scullion, 2019), Section 3 outlines the constraints that multi-level citizenship may have imposed on the everyday lives of Roma EU citizens in the UK (see also Chapter 6). In this regard, Section 3 is primarily concerned with the administrative and policy barriers that Roma EU citizens experienced when they attempted to access social provisions in the UK. The chapter concludes by reiterating the key points raised.

Section 1: Constraints at the European Level

This section will outline the constraints that the legal framework as set out at the EU level may impose on EU citizens. Directive 2004/38/EC gives effect to the Treaty on the Functioning of the European Union (TFEU) and the subsequent case law in relation to free movement. As such, it provides the central architecture of the EU's citizenship legislation. It permits EU citizens the right to move to and reside in any EU member state for a period of three months subject only to not posing a threat to 'public policy, public security or public health.' However, the Directive permits mobile EU citizens to access social rights only under specific conditions during the first five years of their residence in another EU member state. In order to access such rights, an EU citizen needs to prove that they satisfy the conditions of the Directive and so, have a right to reside. To ensure a right to

reside for a period that exceeds three months, an EU citizen needs to be a worker or self-employed person in the host member state or have sufficient resources for themselves and their families not to become a burden on the social assistance system of the host member state, as well as possessing comprehensive health insurance (Article 7, Directive 2004/38/EC). EU workers and self-employed persons therefore have the same rights to access social assistance as nationals of the host member state. Economically inactive EU citizens, however, are required to have comprehensive health insurance and not become an 'unreasonable burden' on the host member state. And yet, while the Directive is central to understandings of the residence rights of EU citizens and their family members, the right to equal treatment on the grounds of nationality is protected in primary law by Article 18 of the TFEU and regulated in secondary law by Regulation 833/2004. The latter lays down the principles for the coordination of social security and social assistance rights for mobile EU citizens. Finally, Article 16 of Directive 2004/38/EC permits EU citizens to acquire the right to permanent residence. Those who hold permanent residence status have virtually the same rights as nationals of the host member state. However, in order to acquire it, EU citizens are obliged to have been 'legally' (in line with Directive 2004/EC/38) and continuously resident in their host member state for a period of five years. Thus an EU citizen who breaks their legal right to reside by, for example, not registering as an EU Jobseeker during a period of unemployment, has effectively restarted the clock on acquiring permanent residence in their host member state.

The purpose of Regulation 833/2004 is to prevent disincentives to free movement. The aim of the Regulation is not to harmonise member states' social security systems, but rather to coordinate them so that the social security rights of mobile EU citizens are not undermined by the act of free movement and residence in another member state. It requires that member states take into account the contributions made by an EU national in another member state (Article 50 – 52) and, in certain circumstances, permits mobile EU citizens to take their benefits with them when they move between member states (Article 7). Article 64 of Regulation 883/2004 guarantees that an EU Jobseeker may, under certain conditions, take unemployment benefits with them to another member state for three

months. However, while the Regulation permits EU jobseekers to protect their entitlement to contribution-based benefits, and under certain circumstances to export these for a period of three months, EU jobseekers have an automatic right to remain in a host member state for a period of six months (Case C-292/89, *Antonissen*). Therefore, while Article 24(2) of Directive 2004/38/EC states that the 'host Member State shall not be obliged to confer entitlement to social assistance during the first three months of residence', EU member states are required to provide an EU citizen with social security benefits after a period of three months.

EU law thus permits mobile EU citizens to access three different forms of social benefits - social assistance benefits, social insurance benefits, and social security benefits. Social assistance benefits are means tested benefits and so are delivered on the basis of need (see Chapter 3). Social insurance benefits are contributory benefits and so require the claimant to have a prior record of National Insurance contributions and so prior contributions through employment. Social security benefits are defined as 'special non-contributory benefits' (SNCB) in EU law and are intended to provide supplementary, substitute or ancillary cover against general social security risks.

SNCB provisions are outlined in Annex X in Regulation 883/2004. Article 11 of Regulation 883/2004 suggests that member states should, for the purposes of granting access to SNCBs, take account of an EU citizen's length and continuity of residence and the person's family ties and intentions, rather than their right to reside when granting access to SNCBs (Verschuere, 2007). As such, Regulation 883/2004 overrules member states' national laws on nationality in that it operates as a distinct, alternative route that offers economically inactive EU citizens access to SNCBs in their host member state. However, the extent to which certain provisions can be defined as social security provisions has been a recurrent controversy in ECJ judgments with many of the benefits listed in Annex X having characteristics of social security benefits but also links with social assistance in that they are *not* linked to periods of work or contributions but *are* intended to relieve a financial need (Verschuere, 2007).

As primary law, Article 18 of the TFEU which gives all mobile EU citizens the right to equal treatment on grounds of nationality, should theoretically be the overarching legal framework of EU citizenship with the 'limitations and conditions' laid out in Directive 2004/38/EC being specific expressions of that right (O'Brien, 2017). As such, the ECJ's initial approach to the social rights of mobile EU citizens underscored EU citizens' right to non-discrimination on the grounds of nationality. For example, in *Maria Martinez Sala v Friestaat Bayern* (Case C-85/96 *Maria Martinez Sala*) the ECJ was asked to decide whether a Spanish national who was not a worker could access child rearing allowance in Germany and found that (Case C-85/96 *Maria Martinez Sala v Friestaat Bayern* EU: C: 1998: 217: 61):

As a national of a Member State lawfully residing in the territory of another Member State, the appellant in the main proceedings comes within the scope of application *ratione materiae* of the Treaty.

However, Martinez Sala had been resident in Germany since 1968 and so, although the Court permitted her access to child rearing allowance in Germany, the Court stated that it did not need to enter into the question of whether the Directive 2004/38/EC conferred lawful residence upon the claimant because she had already been authorised to reside in Germany under national law (O'Brien, 2017). As a result, the ECJ's approach did recognise Martinez Sala's right to non-discrimination on the grounds of nationality but left open the question of how to ascertain whether an EU national has been lawfully residing in a host member state (O'Brien, 2017).

Similarly, the legal question underpinning *Baumbast and R v Secretary of State for the Home Department* (Case C-413/99, *Baumbast*) can be compared to that of Ms Sala (Case C-85/96 *Maria Martinez Sala*) because in essence Mr Baumbast, a German national, asked for an acknowledgement of his right to reside in the UK even though he was no longer a worker. The Court was asked whether Article 18 of the TFEU applied when the EU citizen in question did not fulfil the right to reside conditions set out in Directive 2004/38/EC and decided that the limitations outlined in secondary law

had to be applied in line with Article 52 of the Charter of Fundamental Rights. Article 52 of the Charter of Fundamental Rights of the European Union states:

Any limitation on the exercise of the rights and freedoms recognised by this Charter must be provided for by law and respect the essence of those rights and freedoms. Subject to the principle of proportionality, limitations may be made only if they are necessary and genuinely meet the objectives of general interest recognised by the Union or the need to protect the rights and freedoms of others.

Accordingly, the principle of proportionality means that an EU member state cannot apply secondary law in a manner that is disproportionate to the objectives of the EU.

In *Grzelczyk* (Case C-184/99, *Grzelczyk*) a French student studying in Belgium applied for a minimum subsistence payment but his request was refused on the grounds that Mr Grzelczyk was not a worker. The Court decided that as Belgian students in the same position as Mr Grzelczyk would have met the conditions for obtaining the minimum subsistence payment, Mr Grzelczyk *had* suffered discrimination on the grounds of his nationality. This decision did not, however, amount to a direct entitlement for equal treatment for non-nationals but, and similarly to the *Baumbast* (Case C-413/99, *Baumbast*) judgement, a much more muted right to have restrictions on benefit eligibility applied proportionately (O'Brien, 2017: 37).

Accordingly, prior to 2013, the limitations and conditions laid out in Directive 2004/38/EC had to be applied proportionately (Case C-413/99, *Baumbast*) and could not amount to an automatic exclusion from social security provisions for the economically inactive (Case C-184/99, *Grzelczyk*). However, since *Brey* (Case C-140/12, *Brey*), the ECJ has limited the legal relevance of Regulation 883/2004 for the free movement of and equal treatment of the economically inactive (Thym, 2015). In *Brey*, a German couple who had relocated to Austria in 2011 applied for a pension supplement which had previously been classified as an SNCB but was subsequently restricted by the German government to

those who had a legal residence status. The central questions in *Brey* were whether the provisions being sought were SNCBs and, if so, whether Mr Brey had an *ex-ante* right to reside as a self-sufficient person. The Court (Case C-140/12, *Brey*) not only decided that the Austrian pension supplement did fall within the scope of Article 70(4) of Regulation 883/2004, but also invoked Directive (2004/38/EC) and noted that the conditions on the right to reside for self-sufficient persons (i.e. non-workers) were ‘intended [...] to prevent such persons becoming an unreasonable burden on the social assistance system of the host Member State’ (Case C-140/12, *Brey*: 57). Nevertheless, the Court did not permit EU member states to exclude economically inactive EU citizens automatically from accessing the provisions outlined in Annex X of Regulation 883/2004. Instead, it required that member states conduct a proportionality assessment of the ‘specific burden which granting that benefit would place on the national social assistance programme as a whole, by reference to the personal circumstances characterising the individual situation of the person concerned’ (Case C-140/12, *Brey*). Therefore, while the *Brey* judgement diluted the entitlements of economically inactive mobile EU citizens, the ‘consolation prize’ was that it required EU member states to undertake a proportionality assessment (O’Brien, 2017: 48).

In *Dano* (Case C-333/13, *Dano*) the Court would go further still. In this case, a Romanian Roma EU citizen who had been living in Germany for four years but had not sought employment was denied access to social assistance benefits. The Court concluded that ‘so far as concerns access to social benefits [...] a Union citizen can claim equal treatment with nationals of the host member state only if his residence in the territory of the host member state complies with the conditions of Directive 2004/38’ (Case C-333/13, *Dano*). Therefore, while *Brey* (Case C- 140/12, *Brey*) did not result in legislative reforms but rather an adjustment of administrative practices (Blauberger and Schmidt, 2014), *Dano* effectively reversed the objectives of Directive 2004/38/EC (Thym, 2015: 25) in that it

transformed it from a means to facilitate free movement into a means to ‘prevent economically inactive Union citizens from using the host Member State’s welfare system’ (Case C-333/13, *Dano*).⁵

The trend of discounting proportionality has been reiterated in recent ECJ judgements. In *Alimanovic* (Case C-67/14, *Alimanovic*) a Swedish Roma woman and her daughter, both of whom were resident in Germany, sought to access unemployment benefits as former EU workers. Article 7 of Directive 2004/38/EC allows EU citizens who have been engaged in paid employment in their host member state to retain their worker status for a period of one year. However, EU citizens who have worked for less than one year are only permitted to retain worker status for a period of six months. Given that the claimants had been employed for a period of eleven months and had received social benefits for a period of six months, the ECJ found that the claimant had no pre-existing right to equal treatment. However, while Ms Alimanovic could not enact her rights as a former EU worker, the Court found that she could enact EU citizenship rights as an EU jobseeker. As such, in the *Alimanovic* case the ECJ acknowledged that if the benefit in question was a provision provided to facilitate access to the paid labour market then it could not be social assistance from which EU jobseekers are excluded.

Nevertheless, and as noted above, the extent to which certain provisions can be defined as social security provisions has been a recurrent controversy in ECJ judgments. Therefore, and in contrast to previous judgements (*Case C-22/08 and C-23/08 Vatsouras and Koupatantze*), in *Alimanovic* the court found that EU jobseekers cannot access social assistance benefits even if they form part of a scheme which facilitates labour market access. The reason for this was that the ‘predominant function of the benefits at issue in the main proceedings is in fact to cover the minimum subsistence costs necessary to lead a life in keeping with human dignity.’ Accordingly, while Annex X of Regulation 883/2004 does provide EU jobseekers with access to SNCB, in its targeting of means tested benefits, the *Alimanovic* judgement suggests that ‘jobseekers may be entitled to benefits unless that

⁵ Since the fieldwork was completed (see Chapter 2), ECJ case law has offered some clarity on the residence rights of EU Jobseekers (see Conclusion).

entitlement stems from need (i.e. unless their human right to dignity is at stake)' (O'Brien, 2017: 53 – parenthesis in the original).

The explanations for the shift in the ECJ approach to social rights tend to emphasize the ECJ's responsiveness to EU member states' preferences (see Blauburger *et al.*, 2018). However, while these explanations do capture important elements of the Court's behaviour, they do not take into account the importance of public opinion (Blauburger *et al.*, 2018). In contrast, Blauburger *et al.*'s. (2018) research has shown there is a close parallel between the politicisation of free movement (see Chapter 1) and deviations in ECJ case law. Blauburger *et al.* (2018) suggest that while the ECJ is indeed responsive to the preferences of EU member states, the ECJ's jurisprudence also corresponds with the politicisation of EU citizenship. This may have especially been the case in the run-up to the UK's referendum on EU membership with the *Commission v UK* judgement taking place nine days before the referendum. In this case, the *European Commission (Case C-308/13 Commission vs UK)* asked the ECJ to decide whether the UK's right to reside test was an example of direct discrimination on the grounds of nationality because UK nationals automatically have a right to reside, while EU citizens have to demonstrate that they meet the criteria outlined in Article 7 of Directive 2004/38/EC. The Court decided that the UK's right to reside test was indirectly discriminatory and so, permissible:

[T]he legislation gives rise to unequal treatment between United Kingdom nationals and nationals of the other Member States as such a residence condition is more easily satisfied by United Kingdom nationals, who more often than not are habitually resident in the United Kingdom, than by nationals of other Member States, whose residence, by contrast, is generally in a Member State other than the United Kingdom' (ECJ Judgement Case C-308/13 *Commission vs UK*, para 78).

It has, therefore, been suggested that '[t]ogether, the UK and the ECJ [...] kicked over the dying embers of Union social citizenship' (O'Brien, 2017: 3).

The trajectory of the ECJ thus elevated the conditions of the Directive (i.e. secondary law) into the position of constitutive elements of the basic right to equal treatment (i.e. primary law), meaning that persons not meeting those conditions are simply ineligible for protection against non-discrimination (O'Brien, 2017: 60). Moreover, it rendered EU Jobseekers ineligible for social assistance provisions. That said, EU law does provide some limited protection to mobile EU citizens. First, the definition of a worker in EU law is very broad in that part-time workers and low-paid workers can still fulfil the criteria for 'worker' status (Case C-14/9, *Genc*). It follows therefore that while EU citizens have increasingly been required to be economically active in order to acquire the right of equal treatment, at EU level the criteria for doing so is not particularly onerous. In EU law worker status is an economic status, not a legal one (*JA v. Secretary of State for Work and Pensions* 2016) meaning that EU citizens do not need to have been engaged in the formal labour market in order to have a right to reside as an EU worker. This acknowledgement of grey labour market work as work may be particularly important in the case of Roma EU citizens with Roma in Europe often working in informal sectors (see FRA, 2014) (see Chapter 3). Second, an EU worker who stops working on account of incapacity (i.e. ill health) can acquire permanent residence provided that they resided in the host member state for more than two years (Article 17 of Directive 2004/38/EC). Third, EU workers who take time off work due to childbirth can retain worker status for a period of one year without affecting the five-year period of continuous residence required for permanent residence (Case C-507/12 *Saint Prix*). However, outside of this maternity period, EU law does not allow women who have left the paid labour market to engage in unpaid care work to retain their worker status (see Shutes and Walker, 2018: 140). Fourth, the *Teixeira* (Case C-480/08 *Teixeira*) based right to reside permits a continuing right to reside and equal treatment in relation to social assistance for the primary carers of EU national children who are engaged in education. As such, O'Brien (2017: 78) found that the *Teixeira* right to reside acted as a 'lifeline' for single parent families in her study. However, time spent exercising the *Teixeira* right to reside does not count towards permanent residence (see below) because in essence the rights attach to the child rather than their parent.

Moreover, in order to qualify for a Teixeira based right to reside, the EU national parent has to demonstrate that they are a former worker. Finally, the EU's Social Security Coordination rules allow economically inactive EU citizens and their family members to access 'cash sickness benefits' in their host member state. However, the EU citizen in question must have had a right to claim benefits or have made sufficient contributions in either their home state or their host member state (see Child Poverty Action Group, 2020).

In conclusion, this section has shown that EU citizenship does provide limited protections to mobile EU citizens who relocate to another EU member state. However, these protections are only available for a limited period of time, in very specific circumstances and, in the vast majority of cases, only if the EU citizen in question has previously fulfilled the conditions contained in Directive 2004/38/EC.

Section 2: Changing Constraints in the UK

This section outlines the legal policy changes imposed on EU citizens in the UK post-2014. The EU's power to intervene in welfare systems at the national level is limited by the principle of subsidiarity. As Article 5(3) of the Treaty on the European Union states:

Under the principle of subsidiarity, in areas which do not fall within its exclusive competence, the Union shall act only if and in so far as the objectives of the proposed action cannot be sufficiently achieved by the Member States, either at central level or at regional and local level, but can rather, by reason of scale or effects of the proposed action, be better achieved at the Union level.

Therefore, the implementation of European social policy remains the prerogative of the EU's member states with the principle of subsidiarity resulting in the continuing existence of a diversity of welfare systems across the EU. As such, even when EU citizens have recourse to welfare benefits in their host member states, the provisions that they can access differ substantially in different member states (see Chapter 1) (see Table 3: Overview of EU social welfare provision in the UK).

Table 3: Overview of EU social welfare provision in the UK

Definition in EU Law	Provision at UK Level
Social Assistance	Working Tax Credit, Housing Benefit, Council Tax Reduction, Income Based Employment Support Allowance
Social Security (SNCB)	Jobseekers Allowance, Child Benefit, Child Tax Credit
Cash Sickness Benefit	Disability Living Allowance, Carer's Allowance, Personal Independence Payments, Contributory Employment and Support Allowance

Table 3: Overview of EU Social Welfare Provision in the UK (Sources O'Brien, 2015; 2017; Child Poverty Action Group, 2020; DWP, 2020)

At the same time, member states have scope to diverge in the ways in which they allow EU citizens to access their particular welfare systems, albeit in accordance with the evolving and complex EU legal framework outlined in the previous section. In other words, the particular transposition and implementation of primary and secondary EU law has significant implications for mobile EU citizens. Notably, the conditions inherent within Directive (2004/38/EC) have been implemented in different ways within EU member states based on 'divergent theoretical visions on how to perceive EU citizenship and the limits of solidarity' (Thym, 2015: 5).

In the UK context, free movement had become increasingly politicised and the restrictive trajectory of ECJ case law (which may have owed something to such politicisation) made it possible for the Westminster government to respond to growing Euroscepticism in the UK by limiting access to welfare (see Chapter 1). This is particularly apparent in relation to the 2014 measures: David Cameron (2013), the then Prime Minister in the UK, had published an article in the Financial Times announcing the measures entitled 'Free movement within Europe needs to be less free.' Similarly, the press release that accompanied the MET stated that it was 'part of the government's long-term plan to cap welfare and reduce immigration' (DWP, 2014a). Thus the politicisation of free movement

of free movement in the UK had significant implications in relation to the social rights of EU citizens in the UK.

The social rights of EU citizens in the UK were governed in accordance with the right to reside and habitual residence tests. The right to reside test was not a residence condition *per se* but rather a legal status that determined whether an EU citizen is considered to be 'legally resident' for the purpose of claiming benefits. Immigration (European Economic Area) Regulations 2016, formerly Immigration (European Economic Area) Regulations 2006, represented the UK's attempt to transpose the Citizenship Directive (Directive 2004/38/EC) with the legislation including the categories laid out in Article 7 of Directive 2004/38/EC and establishing the concept of the right to reside.

EU citizens who were classified as EU workers had virtually the same rights as UK nationals. They could access a range of social assistance provisions (Working Tax Credit, Child Tax Credit, Child Benefit, Housing Benefit, Council Tax Reduction, Pension Credit, Income Based JSA, Income Support, Income Based Employment and Support Allowance) (see Table 4: Overview of EU legal status and provisions available in the UK) provided that they met the eligibility criteria. However, in 2014, the Westminster Government introduced the MET. The MET required that an EU national who was engaged in the paid labour market earned a minimum of £162 per week (correct 2018/19) for three months in order to qualify as a worker and therefore pass the right to reside test. Accordingly, the introduction of the MET can be seen to have redefined the status of EU worker at the UK level (O'Brien, 2015; 2017). However, while the MET required that PAYE workers earn £162 per week in order to have their work count as work (see Chapter 3), self-employed workers were required to show that their business had turned a profit of £162 per week for a period of three months (see DWP, 2014b). The introduction of the MET, therefore, not only redefined the status of EU worker (O'Brien, 2015; 2017) but also redefined the forms of work that count as work at the UK level.

Moreover, while the MET was supposed to be a two tier test – meaning that those who did not earn this amount would still have an opportunity to claim their rights on other grounds – it was in effect

implemented as a blanket rule (O'Brien, 2017). In the second tier of the test, those who had not earned £162 per week for three months were, in principle at least, to be assessed to see whether their work was 'genuine and effective' or 'marginal and ancillary' (DWP, 2014a). To this end the decision maker guidance (DWP, 2014b) stated that when determining whether or not someone was a worker, the following were relevant considerations:

1. Whether work is regular or intermittent
2. The period of employment
3. Whether the work is intended to be short term or longer term at the outset
4. The number of hours worked
5. The level of earnings

Criteria 4 and 5 were simply repeats of the tier one test, with the other factors being regularity and duration of work and whether the work was intended to be long term. So, in the second tier, the factors that had already been assessed in the first tier were then levelled against these other criteria. As O'Brien (2017: 156) argues, this steered decision makers towards using tier one to inform the assessment of the extent to which work is genuine and effective at tier two. Moreover, the guidance also stated that 'work that is part-time or low paid is not necessarily always marginal and ancillary' (DWP, 2014b). The assumption here, then, was that part-time and low paid work is usually marginal and ancillary but not always (O'Brien, 2017).

Furthermore, in order to access JSA, Child Benefit and Child Tax Credit as an EU Jobseeker (see Table 4: Overview of EU legal status and provisions available in the UK), an EU citizen was required to be habitually resident in the UK. The habitual residence test assessed whether an EU citizen and returning British citizens had resided in the UK for 'an appreciable amount of time' (Sibley and Collins, 2014). Under the Social Security (Jobseekers Allowance: Habitual Residence) Amendment

Regulations 2013 (SI 2013/3196) an EU citizen had to demonstrate that they had been resident in the UK for a period of three months before they could be considered to be habitually resident. As such, the DWP did not provide EU jobseekers with access to any form of right to social security provisions until they had entered into formal employment or been resident in the UK for a period of three months.

Habitual residence on its own, however, did not permit EU Jobseekers to access benefits with Social Security (Habitual Residence) Amendment 2004 (SI 2004/1232) requiring that EU citizens also pass the right to reside test. In order to have a right to reside as an EU jobseeker, an EU citizen was required to be registered with JobCentre Plus and sign on as available for and seeking employment (DWP, 2014c). As such, all jobseekers, including EU citizens, were required, under the threat of benefits sanctions, to engage in and document up to thirty-five hours of job seeking activity and training per week to retain eligibility to their benefit (see Chapter 3). Moreover, from 2014 onwards, all EU citizens deemed to have insufficient English language skills were required to attend mandatory ESOL classes for a period of six months (DWP, 2014c) (see Chapter 3).

Finally, after an EU Jobseeker had been receiving JSA for a period of three months, they were required to pass the GPOWT. The GPOWT required that EU citizens provide 'compelling evidence of genuine prospects of work' (DWP, 2014c). In order to pass the GPOWT:

1. An EU jobseeker had to provide either evidence of a job offer (with a start date, confirmed income, hours per week and duration). However, the work had to be genuine and effective – meaning it satisfied the MET and started in the next three months. It has therefore been suggested that the GPOWT did not actually test for a genuine chance of employment but 'instead require[d] evidence of a practical certainty of imminent employment' (O'Brien 2017: 138) that was due to start within the next three months and met the requirements of the MET.

2. Or the EU Jobseeker had to provide evidence of a change of circumstances within the last two months that makes it ‘likely the claimant will receive a job offer imminently’ and as a result of the change ‘they are awaiting the outcome of a job interview’ (DWP, 2014c: para 15). This allowed for a two-month extension of the right to reside. However, a guidance memo issued in 2014 (quoted in O’Brien, 2017: 139) stated that the decision maker ‘should note that it is irrelevant whether the evidence is compelling if the change in circumstances does not meet the “date of change” requirement.’ As O’Brien (2017: 139) notes, the memo ‘suggests a deliberate limiting of discretion to narrowly circumscribed circumstances with little relationship to testing for evidence of a genuine chance of work.’

Table 4: Overview of EU legal status and provisions available in the UK

Legal Status in EU Law	Provisions Available in the UK
EU Worker	Working Tax Credit, Child Tax Credit, Child Benefit, Housing Benefit, Council Tax Reduction, Pension Credit, Jobseekers Allowance, Income Support, Income Based Employment and Support Allowance
EU Jobseeker	Jobseekers Allowance, Child Benefit and Child Tax Credit
Economically Inactive EU Citizen	Disability Living Allowance, Carer’s Allowance, Personal Independence Payments, Child Tax Credits, Child Benefit, Housing Benefit, Contributory Employment and Support Allowance

Table 4: EU Legal Status and Provisions Available in the UK (Sources O’Brien, 2015; 2017; Child Poverty Action Group, 2020; DWP, 2020)

Finally, the MET and GPOWT also placed significant restrictions on those who had retained worker status - i.e. those who had previously been engaged in the paid labour market for either 6 or 12

months. While EU jobseekers faced a three month delay in accessing SNCBs and had been disqualified from accessing Housing Benefit, an EU citizen who had retained worker status could access social assistance benefits immediately upon the involuntary loss of their employment. However, there were a number of conditions attached to this. First, the EU citizen in question needed to have been employed for a period of 6 or 12 months and their previous employment had to meet the conditions of the MET (DWP, 2014c). Second, they needed to register with JobCentre Plus without undue delay. However, former workers often conduct job searches independently using their own networks and then later find out that they have not retained worker status on account of their unregistered job seeking (O'Brien, 2017). Third, while EU law permits those with retained worker status a right to reside of up to one year depending upon the length of their previous employment, in the UK, the GPOWT took place six months after the former worker had submitted a claim for social assistance (DWP, 2014c). As such, the GPOWT created a significant hurdle to retaining worker status for longer than six months (O'Brien, 2017). Fourth, while new arrivals could rely on their initial three months of residence to begin job seeking before running down the clock on the reasonable period of time, EU citizens who had been engaged in the paid labour market in the host member state but had not retained worker status could not (Welsh, 2021; see also O'Brien, 2015; Dagilyte and Greenfields, 2015). Accordingly, O'Brien (2015: 115) notes:

The new rule appears to, counterintuitively, treat people who have worked and then become jobseekers (without retaining worker status) less favourably than newly arrived jobseekers: new arrivals have a total of six months' right to reside as jobseekers, with the first three unpaid; people who have had another status and become jobseekers, face losing their right to reside after only three months of jobseeking.

The UK's broadly restrictive approach to EU citizens' social rights, which was driven by a hostile political climate (see Chapter 1), was facilitated by the hardening ECJ jurisprudence described in the

previous section. However, the criteria for attaining EU status in the UK were arguably more onerous than the conditions permitted in EU law with some critics questioning whether the restrictive legislation in the UK was in compliance with that law (O'Brien, 2015; Bruzelius *et al.*, 2016).

Section 3: Constraints for Roma in the UK

This section outlines the constraints that multi-level citizenship may have imposed on Roma EU citizens in the UK. As discussed in Chapter 3, Roma EU citizens have been drawn to the UK by the liberal structure of the paid labour market, however the jobs in which they were engaged were often precarious (see Chapter 4). It follows, therefore, that Roma EU citizens were likely to need to draw on social welfare in the UK. However, the UK's restrictive approach to the social rights of EU citizens can be seen to have extended conditionality (see Chapter 1) to an additional group - i.e. those who were engaged in the paid labour market but did not earn the required £162 per week - while simultaneously reducing the entitlements of those who did not meet these conditions. As such, the 'burden of proof, in terms of demonstrating employability and longevity of employment, was much greater for migrants than that required by UK citizens' (Dwyer *et al.*, 2016: 5).

While Roma EU citizens were not explicitly targeted by the 2014 measures, they can be seen to have been implicitly targeted with their willingness to engage in part-time and low-paid work meaning that they were more likely than other EU citizens to be impacted by the 2014 changes (see Chapter 1). It is for this reason that Dinu and Scullion (2019) have explored the experiences of A2 Roma EU citizens in the UK's increasingly conditional social security regime and highlighted not only why Roma EU citizens needed to claim social security provisions in the UK but also the barriers that they faced when they tried to move back into employment (see Chapter 1). All of the Roma respondents included in their research were found to have worked previously in the UK but had become unemployed and so had claimed financial support in the form of JSA while they attempted to re-enter the paid labour market. However, for a majority of respondents, the behavioural conditions, or 'hassle' (Dinu and Scullion, 2019: 137) attached to a claim for JSA were found to result in

significant stress. Accordingly, Dinu and Scullion (2019: 135) suggest that the increasing 'burden of proof' and an intensified level of conditionality linked to the application of the GPOWT may have resulted in some A2 Roma EU citizens disengaging with Jobcentre Plus and seeking to support themselves through engagement in the informal labour market and/or self-employment.

Similarly, Dagilyte and Greenfields' (2015) exploratory research focused on the experiences of A8 Roma EU citizens and their families when claiming Income Based JSA and Housing Benefit in two English cities (see also Chapter 1). Their research confirms some of the points raised by Dinu and Scullion (2019). For example, they found not only that the primary aim of Roma EU citizens' free movement was to avoid discrimination in their countries of origin and access employment opportunities denied to them in their home member states (see Chapter 4), but also that Roma EU citizens had an extremely limited understanding of their right to access social provisions in the UK. Accordingly, both Dinu and Scullion (2019) and Dagilyte and Greenfields' (2015) argue that a claim for JSA was a last resort for Roma EU citizens.

However, Dagilyte and Greenfields' (2015) analysis of Roma families' experiences of claiming JSA and Housing Benefit in the UK resulted in their research engaging directly with the question of the protections outlined in EU law. In particular, they explored the conditions that EU citizens needed to meet in order to demonstrate habitual residence and a right to reside in the UK and found that it was extremely difficult to find definitive guidance. They noted Citizens Advice guidance which suggested that mortgage or rental documents, proof of registration with a GP or evidence of children in school may be sufficient. Nevertheless, 'it may prove difficult if not impossible for new migrants to evidence this' (Dagilyte and Greenfields 2015: 482). Furthermore, they found that habitual residence and right to reside tests were no longer undertaken by a postal application but rather that EU citizens were required to attend an interview at JobCentre Plus. This increased the likelihood of a lack of uniformity in decision making. As such, considerable numbers of applicants chose to cease their claim in the belief that they would not be able to provide the necessary documentation, thus waiving their rights

as EU citizens on account of the administrative burden (Dagilyte and Greenfields, 2015: 483). Furthermore, even when Roma EU citizens were able to meet the administrative burden, there was evidence to suggest that frontline welfare administrators were not only failing to take into account the length and continuity of residence when ascertaining an EU citizen's habitual residence/right to reside, but were also using delaying tactics such as sending Roma back and forth to seek additional evidence, or to return for additional interviews which ultimately led to a deepening of social exclusion and poverty (Dagilyte Greenfields, 2015; also see Paterson *et al.*, 2011; O'Brien, 2017).

Accordingly, the derived right of residence - i.e. being classified as the family member of an EU worker became increasingly important for Roma post-2014 (Dagilyte and Greenfields, 2015). This protection, however, was dependent not only upon the labour market engagement of a family member (see Dagilyte and Greenfields, 2015) but also the existence of a continuing relationship with that family member. As a result, O'Brien (2017) found that women often fell through the cracks in EU law at the point at which their relationship with their partner or husband broke down.

Neither Dinu and Scullion (2019) nor Dagilyte and Greenfields' (2015) research, however, engaged with the question of Roma EU citizens' access to benefits as EU workers (Working Tax Credit, Child Tax Credit, Child Benefit, Housing Benefit, Council Tax Reduction, Pension Credit, Income Based JSA, Income Support, Income Based Employment and Support Allowance). In contrast, this project has shown that access to in-work benefits were of particular importance to Roma EU citizens (see my findings in Chapter 4) with these provisions being designed to support low-income families who were engaged in the paid labour market (see Chapter 3).

As noted in Section 1, EU law permits those who are engaged in the grey labour market to access EU workers status. However, this protection may have been undermined at the UK level. In order to access EU worker status in the UK, an EU citizen is required to be registered with Her Majesty's Revenue and Customers (HMRC). However, HMRC has strict measures in place to ascertain when a worker is engaged in the grey labour market. HMRC uses Connect software to uncover hidden

relationships between organisations, customers and their associated data links. The software uses data from 28 different sources, cross referencing one billion internal and third party data sources and transforms the client's data into a spider diagram (Nagy, 2016a, 2016b). When someone is operating in the grey economy, the spider diagram has a different shape. As Nagy (2016b: 88) notes, the HMRC's surveillance gaze:

is a crucial technique in the neoliberal strategies of nation states, making it possible to identify, differentiate, monitor and intervene with populations and individuals who deviate from cultural values and accepted forms of individual responsibility.

The policy structures in the UK can thus be seen to have redefined the forms of work that count as work in the 2011 to 2014 period. However, while these processes sort workers based on their financial parameters, Roma EU citizens understood and explained them as ethnic targeting and responded to them accordingly (Nagy, 2019: 91).

In the 2011 - 2014 period, A8 Roma EU citizens who were resident in the UK but employed in the grey labour market employed one of two strategies in order to negate HMRC's surveillance gaze (Nagy, 2016a) and so, access their rights as EU workers (see Table 4: Overview of EU legal status and provisions available in the UK). The first economic strategy employed by A8 Roma EU citizens who were employed in the grey labour market was to engage with the DWP rather than HMRC because EU citizens from the A8 countries could access social assistance provisions as EU Jobseekers in the 2011-2014 period and so, subsidise their income (Nagy, 2016a; 2016b). However, the stringent conditions attached to a claim for JSA, and the personal nature of such claims, meant that Roma EU citizens preferred to claim provisions through HMRC. Thus the second, and preferred, economic strategy employed by A8 Roma who were engaged in the grey labour market in the 2011 to 2014 period was to use fictitious employment contracts and payslips when submitting their Working Tax Credit applications. Nevertheless while this economic strategy may have initially allowed Roma families to access in-work benefits, at the end of the tax year HMRC matches the details of an initial

claim for Working Tax Credit to the Tax and National Insurance data submitted by the worker's employer. As a result, several of Nagy's (2016a; 2016b) respondents were required to pay back the monies that they had received from HMRC in the next financial year. Self-employed workers, however, are responsible for submitting their own Tax and National Insurance data to HMRC. As such, Nagy (2016b) notes that one of her respondents switched from using fictitious employment contracts and payslips in her Tax Credit application to self-employment, in the hope that she would not be required to repay the monies that she received from HMRC in the next financial year. Self-employment, therefore, may have been mutually beneficial for both employers who wanted to engage EU citizens in the grey labour market (see Chapter 3) and Roma who were engaged in the grey labour market because not only would it have allowed Roma to access the paid labour market (see Chapter 3) but it may also have allowed them to avoid HMRC's surveillance gaze.

From 2014 onwards, a claim for JSA would no longer have permitted EU Jobseekers to access social assistance provisions in the UK (see Section 2). Nagy (2016b: 86) notes that '[w]hen restrictions on claiming Jobseeker's Allowance were introduced, applications for tax credits increased among research participants.' However, in 2014, HMRC compliance checks were extended to 'all EEA migrant claims' (HM Government, 2014 quoted in O'Brien 2015: 129). As O'Brien (2015: 126) notes:

This systematic testing resonates with the overall EU benefit reform package, feeding a corrosive xenosceptism within the system. These changes are not merely 'Euroseptic' - which suggests a wariness of EU institutions; they target people.

This extension of HMRC Compliance Checks may have had a particular impact on Roma EU citizens with Paterson *et al.*'s (2011: 05) research – which was carried out in Glasgow in 2010 (i.e. prior to the 2014 changes discussed in this chapter) - finding that 44% of Roma cases were dealt with by HMRC's 'Compliance Team'.

Thus, in 2014 it may have become increasingly difficult for Roma EU citizens who were engaged in the grey labour market to legalise their residence status in the UK. However, the recognition of an EU

citizen's residence status not only had implications in relation to their access to benefits but also their ability to remain in the UK. Immigration (European Economic Area) Regulations 2016 allowed the UK authorities to administratively remove an EU citizen if they had never had or had stopped having a right to reside.

Administrative removal differs from deportation in two ways. First, those who are deported are normally convicted of a crime. Second, administrative removal only prevented EU citizens from re-entering the UK for a period of 12 months. However, Dagilyte and Greenfields (2015) found evidence of a 'Kafkaesque cycle' - i.e. a system where a rejection of a welfare benefit claim gave rise to further investigations about an EU citizen's right to reside and then the subsequent administrative removal of an EU citizen. As such, Dagilyte and Greenfields (2015: 491) concluded that:

[T]he impact of the 2013–2014 welfare benefits changes, viewed by the EU/EEA Roma migrants we interviewed, is that the Government's aim is not just about limited access to benefits, but to reduce access to UK territory in general, replicating the centuries of discrimination and economic exclusion experienced by these vulnerable minority groups.

Administrative removal was a growing concern for EU citizens in the UK post-2014 with evidence emerging of a distinct policy (perhaps unwittingly assisted by civil society organisations) pertaining to the removal of homeless or otherwise socially excluded EU citizens, particularly those from the A2 member states (Greenfields and Dagilyte, 2018: 93). Notably, just prior to my own fieldwork in Glasgow, 'Operation Mighty' – an operation involving Police Scotland, the Home Office, HMRC, DWP and the National Crime Agency that claimed to have uncovered nearly £1 million in fictitious Tax Credit claims (Stewart, 2017) - had been undertaken. Those involved in 'Operation Mighty' had been arresting and detaining Romanian Roma, refusing them entry at Scottish airports unless they could provide evidence of employment (Romano Lav, 2019), and administratively removing Romanian Roma from Glasgow (see also Chapter 6).

It is thus clear that post-2014, the UK context was a particularly challenging one for many Roma EU citizens. This has been confirmed by the literature that has engaged with the question of Roma EU citizens' experiences of constraints in the UK, particularly following the hardening of conditionality post-2014 (Dinu and Scullion, 2019; Dagilyte and Greenfields, 2015). However, previous research has not explored Roma EU citizens' experiences when they attempt to access social assistance provisions as EU workers. Roma EU citizens were particularly vulnerable to being denied EU worker status post-2014 because not only did the introduction of the MET redefine the status of EU worker (O'Brien, 2015; 2017) but it also redefined the forms of work that count as work. Nevertheless, the exclusion of EU Jobseekers from social assistance provisions and the extension of HMRC compliance checks to all EU citizens post-2014 would not only have meant that some of the economic strategies employed by Roma in the 2011 to 2014 period would no longer have been sufficient post-2014, but also that Roma were more likely to be referred to immigration authorities (Greenfields and Dagilyte, 2018).

That said, interaction between the protections at the EU and UK levels may have offered some respite for Roma EU citizens. For example, the birth rate in Roma populations tends to be higher than that of the majority population in Europe (Fundación Secretariado Gitano, 2009). However, in the UK single parents are not required to work more than 16 hours per week. As such, this protection may have been important in the case of Roma single parents in that it permitted a reduction in the level of conditionality to which those who were engaged in the paid labour market were exposed. In addition, it may also have permitted the EU citizen in question to access the Teixeira right to reside (see Section 1) if at some point in the future they were unable to engage in the paid labour market. However, in order to acquire the Teixeira based right to reside, the EU national parent has to demonstrate that they are a former worker - i.e. that they had been engaged in the paid labour market in the UK for a period of one year (see Section 1). Thus the Teixeira right to reside may have been particularly difficult for Roma single parents to acquire with the introduction of the MET

meaning that those who were engaged in precarious forms of employment (see Chapter 4) were more likely to have gaps in their legal status (see O'Brien, 2017).

Similarly, when compared to their non-Roma peers, Roma children are twice as likely to have a disability (Vincze *et al.*, 2019). However, not only did the EU's Social Security rules allow economically inactive EU citizens to access 'cash sickness benefits' in the UK but people who cared for claimants of Disability Living Allowance (DLA), Personal Independence Payments (PIP) and Attendance Allowance (AA) were permitted to access Carer's Allowance in the UK (Table 4: Overview of EU legal status and provisions available in the UK). Carer's Allowance was in essence a benefit given in recognition of a person's reduced capacity to work as a result of their caring obligations (O'Brien, 2017: 175). However, while those EU citizens who had significant caring responsibilities could access Carer's Allowance in the UK, not only was there an income threshold of £122 per week (correct as of 2018/19) but the carer was only indirectly entitled to this provision on account of the cared for person's needs rather than their own needs. This highlights a key gap in EU law because while unpaid care work contributes £132 billion to the UK economy a year (Buckner and Yeandle, 2015), care work is not considered to be an economic activity within the EU's legal framework (see O'Brien, 2017). As O'Brien (2017: 94) notes '[t]he very conception of 'dependence' built into the free movement framework is skewed, since workers are in many senses functionally dependent upon those facilitating the work through providing care for children and adults.'

Finally, in the UK, there were two different types of means tested benefits available to those who were not engaged in the paid labour market. JSA for those who were unemployed, and Employment Support Allowance (ESA) for those who had disengaged with the paid labour market on account of illness. There were also two types of ESA available to EU citizens resident in the UK - Income Based ESA and Contributory ESA (see Table 3: Overview of EU social welfare provision in the UK). A claim for either type of ESA may have been beneficial to Roma EU citizens resident in the UK for two reasons. First, Roma populations in Europe frequently face barriers to accessing good-quality health care, with

one third of Roma aged between 35 and 54 years of age having reported health problems that limited their daily activities (European Commission, 2014: 4). Second, the behavioural conditions inherent in a claim for ESA may differ from those inherent in a claim for JSA with those who are in the Work Related Activity Group being required to perform some work related activity but on a less regular basis and those who are in Support Group not being required to engage in work related activities. Transferring disabled claimants from JSA to ESA - i.e. the correct welfare provision for disabled people - can reduce the level of conditionality to which they are exposed (Fletcher, 2016). However, in order to qualify for ESA an EU citizen not only had to be experiencing significant health issues that 'limit their capacity to work' (Child Poverty Action Group, 2020: 708) but they to document that they have EU worker status (Income Based ESA) or that they have a right to claim benefits as economically inactive EU citizens (see Table 4: Overview of EU legal status and provisions available in the UK) (see also Section 1).

Therefore, the interaction between the protections at the EU and UK levels, may have provided some respite for Roma EU citizens. However, these protections were only available in very specific circumstances.

Conclusion

The preceding chapters focused on the various opportunities that EU citizenship and free movement afforded Roma migrants choosing to relocate to the UK. However, while Roma were often drawn to the UK for work opportunities, the often precarious nature of that work drove a potential need to access welfare. As shown in this chapter, accessing such welfare is often not easy for EU citizens, particularly the most economically vulnerable, including many Roma.

This chapter has highlighted the importance of the legal framework at the supra-national level and noted that while the Charter of Fundamental Rights of the European Union specifies an expansive vision of EU social rights, the trajectory of ECJ case law with respect to free movement and EU

citizenship has become increasingly restrictive since 2010. Such a restrictive turn made it permissible for member states to restrict access to social rights and welfare for the economically 'inactive' – in other words, the most vulnerable – non-national EU citizens present on their territory.

The UK has always taken advantage of such conditionality in transposing EU law into domestic legislation and in 2014 made it harder than ever for EU citizens to legitimately access and retain welfare. Indeed, the post-2014 changes arguably go beyond what is permissible in EU law. Such changes took place against the backdrop of increased politicisation of free movement in the UK and the aforementioned restrictive trajectory of ECJ case law (which may have owed something to such politicisation). The implementation of the new framework relied largely on frontline decision makers, who are not neutral but rather required by the structure of frontline administrative work to interpret rules and processes in accordance with their background and experience (Lipsky, 2010). Accordingly, the governmental discourse, and the decision maker guidance outlined in Section 2 of this chapter, will have been central to the constraints experienced by EU citizens post-2014, with O'Brien (2015; see also Dwyer *et al.*, 2019; Dagilytes and Greenfields, 2015) suggesting that decision maker xenoscepticism - i.e. scepticism regarding the genuine nature of an EU citizens' claim - had been imported into the UK welfare system.

Thus, the UK context was a particularly challenging one for vulnerable EU citizens, including, of course, and in particular, many Roma. This has been confirmed by the literature that has engaged with the question of Roma EU citizens' experiences of constraints in the UK (see Chapter 1), particularly following the hardening of conditionality post-2014 (Dinu and Scullion, 2019; Dagilyte and Greenfields, 2015). However, prior research did not explore Roma EU citizens' access to social assistance provisions as EU workers. Roma EU workers may have struggled to access their legal rights as EU workers for three reasons. First, the measures that HMRC put in place to ascertain whether a worker is engaged in the grey labour market in effect redefined the forms of work that count as work in the UK, with those engaged in the grey labour market not being regarded as EU workers. Second,

the MET in effect redefined the status of EU workers at the UK level with those who could not meet the conditions being relegated to a no man's land because they were neither EU workers nor EU Jobseekers (see O'Brien, 2017). Third, the MET also redefined the forms of work that count as work, even when the worker in question was engaged in the formal labour market, with those who were engaged in self-employed work being required to meet different conditions than those who were engaged in PAYE work. As such, Roma EU citizens were particularly vulnerable to being denied EU worker status in the UK because they were more likely to be engaged in low-paid, precarious and grey labour market employment (see Chapter 3). The denial of EU worker status not only had significant implications for Roma EU citizens – rendering them ineligible for social assistance benefits – but also meant that they were more likely to be referred to immigration authorities and potentially 'removed' from the country (Greenfields and Dagilyte, 2018).

Having provided a 'top-down' analysis of the various constraints imposed on Roma in the UK in the context of multi-level citizenship, Chapter 6 offers a 'bottom-up' analysis, reporting my empirical findings on the ways in which Roma EU citizens navigated these issues in Sheffield and Glasgow. In so doing, it both confirms and expands upon the findings of previous research.

Chapter 6: EU Citizenship as Constraint II: Experiences of Roma in Sheffield and Glasgow

Chapter 5 presented a 'top-down' account of the constraints created by multi-level citizenship for Roma EU citizens in the UK. In so doing, it highlighted the increasingly conditional nature of social rights at the European level, the link between ECJ jurisprudence and the UK's restrictive approach to the social rights of EU citizens post-2014, and the impact that this may have had on vulnerable Roma EU citizens in the UK. This chapter, in contrast, draws on my empirical research in order to assess the similarities and differences in the ways in which the constraints created by multi-level EU citizenship have been experienced by Roma in Sheffield and Glasgow (i.e. the 'bottom-up' perspective)(see Chapter 1).

This chapter is therefore concerned with the administrative and policy barriers that Roma EU citizens experienced when they attempted to access social provisions in Sheffield and Glasgow, the protections that Roma EU citizens were able to access in each locale, and the economic strategies employed by those who were neither able to meet the conditions of the MET nor offered protection by the legal framework at the EU level (see Chapter 5). The abductive methodology is thus central to this chapter with the process of moving between these 'top-down' and 'bottom-up' accounts allowing the development of an understanding of the ways in which Roma EU citizens experienced the constraints of multi-level citizenship in the UK.

The chapter proceeds as follows. Section 1 analyses the similarities between the ways in which Roma EU citizens experienced the constraints of multi-level citizenship in Sheffield and Glasgow post-2014. Section 2 explores the different ways in which Roma EU citizens resident in Sheffield and Glasgow experienced the constraints inherent in multi-level citizenship post-2014. Finally, Section 3 outlines the similarities and differences in the economic strategies employed by Roma resident in Sheffield and Glasgow post-2014. The chapter concludes by reiterating the key points raised, noting the key contributions that the research makes to the existing literature and highlighting the importance of the abductive research strategy (see Chapter 2) to the project's findings.

Section 1: Similarities in Roma Experiences of Constraints in Sheffield and Glasgow

This section will analyse the similarities in the ways in which Roma EU citizens experienced the constraints of multi-level citizenship at the local level. The UK's restrictive approach to the social rights of EU citizens can be seen to have extended conditionality to an additional group - i.e. those who were engaged in the paid labour market but did not earn the required £162 per week - while simultaneously reducing the entitlements of those who did not meet these conditions (see Chapter 5). Thus several respondents noted there was a higher 'burden of proof' post-2014 (see Chapter 5):

The biggest problem we've got is production of evidence to demonstrate that people have worked and have worked meaningfully in the UK and it's at the end of the day what it effectively comes down to is the productive evidence to prove that people have done what they say they've done and that's not a position which UK citizens would face. (GKPS05: Welfare Rights Officer, Male)

Obviously, if you work for a year and you lost your job, but you have continuous employment then you can receive Jobseekers Allowance for longer but in the majority of cases they are not able to prove it. If you work for an agency or for more than one employer then it's difficult to prove that you were actually continuously employed because you have gaps, so it wasn't twelve months, so this is the main difficulty to prove it. (SKPS03: Citizens Advice Worker, Female)

There was also evidence to suggest that some Roma EU citizens may have opted to discontinue a claim for JSA in the belief that they would be unable to provide the necessary documentation, thus waiving their rights as EU citizens, on account of the very real administrative burden associated with the application process (see Chapter 5): no Roma respondents in either locale were found to be in receipt of JSA. As a key policy stakeholder respondent explained:

We did the application [for JSA] and they followed the route. I think they struggled because they couldn't understand the concept, they don't understand and also Jobseekers now it is only for three months and it doesn't allow them to claim Housing Benefit. So it's very little help for 3 month so they obviously cannot rely on it and the amount of paperwork and the amount of hassle involved in the application I guess it puts people off (GKPS09: Outreach Officer, Female)

Moreover, even when Roma EU citizens were able to provide the necessary documentation in order to evidence that they had met the habitual residence and right to reside requirements, key policy stakeholder respondents reported that decisions made by JobCentre Plus were inconsistent (see Chapter 5):

Actually, it is not consistent. I have two Roma brothers, in the same situation, they arrived in the country together and one got awarded Jobseekers and the other was refused. Now the question is do we challenge the brother who was turned down or just keep quiet because the first one shouldn't be entitled. It's a very tricky and difficult situation. It's not easy (SKPS03 – Citizens Advice Advisor, Female)

The findings, therefore, imply not only that Roma EU citizens were ceasing their claims for JSA on account of administrative barriers, but also that frontline welfare administrators were failing to take into account the length and continuity of residence when ascertaining an EU citizen's habitual residence/right to reside (see Chapter 5).

The 2014 reforms, however, did not only affect EU citizens' ability to access provisions during times of unemployment: they also impacted their ability to access social assistance provisions during times of employment (see Chapter 5). In order to access welfare provisions as EU workers, Roma EU citizens were required to document that their employment met the conditions of the MET. All Roma respondents who were engaged in the paid labour market at the time of interview were found to be

employed in precarious labour market positions - i.e. short term, zero hour contracts etc. (see Chapter 4). Thus the MET was found to act as a significant constraint for Roma respondents (see Chapter 5). As a Roma worker who had recently failed to demonstrate that she met the conditions of the MET testified:

The impact is huge. You have no money to look after your family, to pay rent and to survive. So, you end up having to go into debt or leaving the country [...] it is causing me huge stress, it made me cry, it made me angry and it gave me stress. Why are they doing this to me? (SR04: Romanian Roma, Female, 30).

Failure to meet the conditions of the MET was particularly problematic for Roma because in effect it relegated them to a legal no-man's land (see Chapter 5). The MET, however, was also found to have been incorrectly administered with the first tier of the test - i.e. the requirement to earn at a rate of £162 per week for a minimum of three months - being implemented as a blanket rule (see Chapter 5). As several key policy stakeholder respondents noted:

I mean we've certainly had cases in the past where a decision letter has simply said you have not, you know, you have not earned 150 whatever, it was at the time pounds per week for the last three months therefore you are not a worker [...] we have seen decisions of that nature and yeah it looks as though tier two just hasn't, you know, hasn't kind of occurred to the decision maker. (GKPS08: Advice Worker, Male)

One thing that concerns me is [...] the definitions of work and marginality [...] and the way the DWP has written the guidance on that doesn't reflect the way it is being carried out. It's, you know, what's meant to be a two-stage test for workers is actually a one stage test [...] what they are told is, 'oh you're not earning enough'. I've just never met anyone who says 'I've got this case where someone has gone into the second stage' at that point (SKPS08: Policy Advisor, Female)

The UK thus represented a difficult environment for Roma EU citizens post-2014 because not only had their rights in times of unemployment been undermined but so had their rights in times of employment. EU law did, however, offer some limited protections to mobile EU citizens insofar as it gave family members of an EU worker or EU Jobseeker the right to equal treatment on the grounds of nationality (see Chapter 5). The derived right of residence - i.e. being classified as the family member of an EU worker - was found to be particularly important for Roma with most Roma women in the study deriving their right to reside from their partners or husbands (see Chapter 5). That being said, given that this right to reside was based upon the economic status of a family member, while a number of Roma women engaged in the study were protected by it, they risked losing their right to access social assistance provision if their relationship with that family member dissolved (see Chapter 5). As a Roma respondent who lost her right to access social assistance provisions when she left her husband and subsequently became the primary carer for nine children noted (also see Chapter 3):

It was very hard, the money was stopped but also the money was sent to another account and the bank cards my husband had them and I did not have access to those cards, so it was difficult and social work had to help us. (GR08: Slovak Roma, Female, 41)

Moreover, in some instances it was in fact Roma women who were found to be the primary earners in their household. These women often experienced problems in accessing social provisions. For example, one respondent was found to be engaged in the paid labour market as a self-employed worker (see Chapter 4). The respondent was a Romanian Roma EU citizen who had been resident in the UK and engaged in the paid labour market as a Big Issue Seller since 2008. At the time of interview, she had recently found out that her claim for social assistance had been terminated as she did not meet the conditions of the MET. She explained the impact that this was having on her and her family:

So, at the moment the benefits have stopped [...] talking about tax credits and child benefit [...] housing benefit has stopped as well. [...] [I]t's a bit difficult now until God will help the benefits start again. (GR12: Romanian Roma, Female, 47)

The respondent had approached a local organisation in Glasgow for support (see Chapter 4) and was advised that in order to access social welfare provisions as an EU worker, she or her adult daughter would need to show that they were engaged in work that met the conditions of the MET. The respondent attempted to find another job but was unable to do so as she was illiterate and had a limited understanding of the English language and so experienced significant labour market barriers (see Chapter 3). However, her adult daughter (GR13: Romanian Roma, Female, 19), who was a single parent to three young children, was able to secure employment through a local cleaning agency. Accordingly, GR13 (Romanian Roma, Female, 19) became the primary earner for the family. As her mother explained:

So, my daughter works now so everything should go on her name, she would be the one claiming housing benefit as well, and she works 16 hours per week now because she's got three children so she can't work more than that. (GR12: Romanian Roma, Female, 47)

As such, the protections offered to welfare claimants at the UK level - i.e. the fact that single parents are required to work 16 hours per week - can be seen to have been important in permitting this Roma family to gain access to social assistance benefits in the UK (see Chapter 5). However, at the time of the interview, GR13 (Romanian Roma, Female, 19) had only been employed for around two and half months and so the family were only just approaching the three-month requirement inherent within the MET (see Chapter 5). As a result, this family were found to be experiencing destitution, with their primary concern when handed the £20 Love to Shop Gift Cards after the interview (see Chapter 2) being whether or not they could use them to buy food for themselves and their children. Therefore, while the protections offered to welfare claimants in the UK were found to be important

for Roma single parents, they were to some extent undermined by the requirements of the MET (see Chapter 5).

Moreover, the Teixeira based right to reside permits a continuing right to reside and equal treatment in relation to social assistance for the primary carers of EU national children who are engaged in education, provided that the EU worker in question could document that they had retained former worker status (see Chapter 5). However, no Roma single parents among the respondents were found to be exercising the Teixeira right to reside, with gaps in their employment, often as a result of their caring responsibilities, meaning that they were unable to document that they were a former worker (see Chapter 5). That said, a small number of Roma single parents *were* found to be accessing social assistance provisions through the EU's Social Security Coordination rules (see Chapter 5) - i.e. claiming DLA for a disabled EU national child (Table 3: Overview of EU social welfare provision in the UK). In this regard, the EU's Social Security Coordination rules were found to act as a 'lifeline' (see Chapter 5) for some Roma single parents in that they permitted them a freedom that many of the other single parents engaged in the research did not have. As a Roma single parent explained:

Just recently I had a job and I abandoned it unfortunately. It was housekeeping work in a hotel and I had to abandon the work [...] because my son has a special needs school [...] they called me from the school [...] and I had to leave work and go and attend to my son (GR08: Slovak Roma, Female, 41)

Paradoxically, the protections outlined for claimants of DLA at the UK level (see Chapter 5) were also found on a small number of occasions to undermine Roma EU citizens' access to employment. For example, at the point of interview, a single parent had recently submitted a claim for DLA for her disabled child and had subsequently been awarded Carer's Allowance. Those who are in receipt of Carer's Allowance are subject to an income threshold of £122 per week (see Chapter 5) which in effect capped the number of hours of work in which they could engage. As a result, her employer terminated her employment. As the respondent explained:

I did not really have any problems until the Carer's Allowance application was put in, they told me I could not work as many days I used to, that I could only earn a limited amount something £122 per week which meant that I could only work like two days per week and the agency didn't like it, at first they called me for two days but they said like they needed people who would be able to work full time so I have not been able to find anything else since I stopped, since they stopped giving me work. I want to go back to work but just two or three days would be good. (GR05: Slovak Roma, Female, 29)

This respondent's access to social assistance provisions was conditional upon her child's residence in the UK rather than her own (see Chapter 5). Therefore, if at any point in the future the respondent's child could no longer access provision through the EU's Social Security Coordination rules, the respondent would also lose her right to access social assistance provisions in the UK. However, the UK conditions not only created a gap in her 'legal' residence but also made it impossible for her to restart the clock on her acquisition of permanent residence with the £122 per week equating to approximately 14 hours of work at the National Minimum Wage (2018/2019) rather than the 16 hours required for a single parent (see Chapter 5).

That said, the protections outlined at the UK level were found to be important for other Roma respondents. In Europe, Roma populations frequently face barriers when attempting to access good-quality health care with one third of Roma aged between 35 and 54 years of age having reported experiencing health problems that limited their daily activities (see Chapter 5). As a result, some older members of the Roma community were found to have significant health problems which were often linked not only to the barriers that they had experienced when they attempted to access good quality health care (European Commission, 2014) but also the forms of employment and in particular the physically demanding manual labour that they had been engaged in, either in the UK or in their countries of origin (see Chapter 4):

I broke my back, I fell from scaffolding, 3 vertebrae were broken. And I'm still suffering the consequences until now. And the boss did not pay me. I didn't get money; I didn't have money to pay for painkillers. I was hungry, and I decided no matter what I would never do it again to work without a contract and I knew that life would be better here, so I decided to leave [Slovakia]. (GR04: Slovak Roma, Male, 54)

From 2004, we did 8 hour shifts and then it changed to 12 hour shifts. That was a very heavy job, we always had to lift something like boxes [...] and I got ill because of that. (SR13: Slovak Roma Female, 50)

Such health problems had a significant impact on Roma EU citizens' ability to access low-paid employment in the UK and so, despite having been successful in accessing and sustaining employment in the UK, often for a number of years, these Roma respondents had often been forced to disengage from the paid labour market on account of ill health. As a Roma respondent explained:

I used to work at Vital recruitment, but my back started aching as I said I had broken vertebrae. I was running out of energy, I was exhausted, and my boss sent me to the GP and twice he sent me home saying 'don't go to work, go to the doctor' because at work I used to work 16-hour shifts. (GR04: Slovak Roma, Male, 54)

However, in the UK those who have a limited engagement with the paid labour market on account of a disability or illness are entitled to claim ESA (see Chapter 5). Therefore, all of the Roma EU citizens who were found to have disengaged with the paid labour market on account of the health conditions that they were experiencing were found to be in receipt of ESA.

In analysing the similarities in Roma EU citizens' experiences of the constraints inherent in multi-level citizenship in Sheffield and Glasgow, it becomes apparent that while the legal and policy frameworks at the UK and EU level did offer Roma EU citizens some protections, not only were they

both extremely limited and extremely fragile but they were also, in some cases, undermined by legal and policy structures at either the EU or the UK level.

Section 2: Differences in Roma Experiences of Constraints in Sheffield and Glasgow

Section 1 focused on the points of commonality in the experiences of Roma in Sheffield and Glasgow. In contrast, this section is concerned with the different ways in which Roma EU citizens experienced the constraints inherent in the multi-level citizenship framework in the two cities. As noted above, Roma EU citizens in both locales were found to be in receipt of ESA. However, the circumstances that led to these claims differed at the local level.

In Sheffield, accessing paid employment had become more difficult since the 2008 financial crisis (see Chapter 4) and so, a number of Roma EU citizens resident in the city had been claiming JSA prior to 2014 (see Chapter 3). Post-2014, EU Jobseekers did not have access to Housing Benefit and EU workers who had been in receipt of JSA for a period of 6 months were required to meet the conditions of the GPOWT (see Chapter 5). Therefore, a small number of key policy stakeholders in Sheffield noted that disabled Roma EU citizens who were experiencing a period of unemployment often opted to claim ESA instead of JSA:

Since this Jobseekers Allowance restriction came into place, I have noted that more Roma clients claim ESA instead due to some illness or disability and more people ask for the disability forms because ESA income is not for three months, it won't stop
(SKPS03: Citizens Advice Worker, Female)

The above quote implies that these claims for ESA were being made in accordance with the EU Social Security Coordination framework - i.e. they were claiming Contribution Based ESA (see Table 4: Overview of EU legal status and provisions available in the UK) - with the three month cut off for JSA only applying to those who are EU Jobseekers, not EU workers. Thus it is somewhat ironic that the introduction of the GPOWT may actually have had a positive outcome for disabled Roma EU citizens

in Sheffield as the transfer of a disabled claimant from JSA to ESA (i.e. a provision designed to support disabled people) significantly reduced the level of behavioural conditionality to which they are exposed with even those who are in the Work Related Activity Group being tested less regularly than those in receipt of JSA (see Chapter 5). As a Roma respondent in Sheffield explained:

Personally, I don't have an issue with that [behavioural conditionality] and it's kind of okay for us because I don't work now, I claim Employment Support and that's like every six months and that's kind of okay (SR10: Slovak Roma, female, 38)

However, and in contrast to Roma in England where a claim for JSA was the last resort (see Dagilyte and Greenfields, 2015; Dinu and Scullion, 2019), in Glasgow a claim for ESA, rather than JSA, was found to be less common and the last resort (see Chapter 5). As a key policy stakeholder respondent in Glasgow explained:

[M]y experience is if you're working, then you're working you get your Tax Credits, your Housing Benefit and all the rest of it. My experience also is that when people stop working it's usually for health reasons so health reasons wouldn't take you into Jobseekers, health reasons would take you into Employment Support Allowance (GKPS05: Welfare Rights Officer, Male).

Therefore, while Roma in both cities were accessing ESA the EU legislation governing their access to this provision differed with disabled Roma EU citizens in Sheffield accessing ESA as economically inactive EU citizens, disabled Roma EU citizens in Glasgow claiming ESA as EU workers (see Table 4: Overview of EU legal status and provisions available in the UK). This is important because it implies that Roma in Sheffield and Glasgow had different welfare needs, especially post-2014. The different welfare needs of the Roma populations in Sheffield and Glasgow are predominantly related to Roma EU citizens' differential access to the paid labour market at the local level (see Chapter 4). This finding was confirmed by key policy stakeholder respondents in Glasgow with several key policy stakeholder respondents, for example, noting that Roma EU citizens tended to be in receipt of social assistance as

EU workers rather than JSA or ESA (see Table 4: Overview of EU legal status and provisions available in the UK):

We don't have very many Jobseeker Allowance applications, it tends to be Tax Credits, Child Tax Credits and Working Tax Credits, Housing Benefit, Council Tax Reduction and Child Benefit are the main applications that we've been dealing with. (GKPS08: Advice Worker, Male)

However, the labour market opportunities that were available to Roma in Glasgow were also found to differ from those that were available to Roma in Sheffield with the evidence from Glasgow suggesting that Roma often work in unregulated sectors of the economy, taking temporary jobs through non-statutory employment agencies, with very low wages, illegal deductions and poor working conditions (see Chapter 4). This was also reflected in the findings in this chapter with the ways in which Roma experienced local level bureaucracy in Glasgow being found to differ from Roma experiences of bureaucracy in Sheffield.

In Sheffield, Roma respondents noted that frontline decision makers were often using delaying tactics such as sending them back and forth to collect additional evidence (see Chapter 5). As a Roma respondents who had experienced delaying tactics when she switched jobs explained:

In the past you applied for something, they asked for something, you sent it to them, you get the money. Now even if you send them, they keep sending you other information and they keep asking for things. The Housing Benefit we've been trying to sort this out since October [5 months], they keep asking us for different information all the time. (SR11: Slovak Roma, Female, 36)

Administrative delays were highly problematic for Roma EU citizens because claimants bear the brunt of delays. Indeed, some Roma families were found to be experiencing poverty and destitution as a

result of the actions of frontline administrators (see Chapter 5). As the respondent quoted above would go on to elaborate:

It is difficult because with the money that I earn, I have to pay rent and then I cannot fully provide for my children (SR11: Slovak Roma, Female, 36)

In contrast, the administrative barriers to which Roma EU citizens were exposed were found to be more severe in Glasgow. As noted in Chapter 5, in EU law the definition of a worker is quite broad in that it includes not only those who are engaged in part-time work but also those who are engaged in the grey labour market. However, this protection may be undermined by bureaucratic practices in the UK because HMRC's surveillance gaze aims to discover when someone is operating in the grey labour market (see Chapter 5). This was a significant theme in Glasgow with numerous key policy stakeholder respondents noting that the most substantial barrier that they faced was HMRC decision makers' reluctance to acknowledge that Roma were engaged in the paid labour market. It is worth quoting one such key policy stakeholder at length:

I would say probably the main barriers, I think there is a culture of disbelief in HMRC particularly. In the compliance teams that deal with the reviews. I've come across cases where decision makers have denied the existence of a restaurant that you could find on Google maps, you could actually find a photo on Google maps. We sent it as evidence and mandatory reconsideration of that, I mean that sort of level of disbelief it wasn't just 'we don't believe that you are working for them' they were like 'we don't believe this cafe exists' it's like, you know. So, I think there is a culture of suspicion, some of which in a sense is well founded because a lot of the employers aren't reliable. We've had issues with restaurants' constant kind of changes of ownership. You know, every year the ownership of the restaurant changes. Therefore the employers change and quite often our clients aren't aware of that, you know, as a phenomenon, they're still going to work for the same people in the same place just as they have done for ages but

when they are asked to provide kind of evidence that, you know, they're saying 'my employer is called this' but it's not and it hasn't been for a while and they might have had two other employers since that. So these kinds of changes are, you know, difficult and from a HMRC decision maker's point of view it wouldn't surprise me if that does look quite suspicious but it's not in the control of our clients. (GKPS08: Advice Worker, Male).

The findings in relation to constraints experienced by Roma in Sheffield and Glasgow thus confirm my findings in Chapter 4 with differences in the labour market opportunities available to Roma in Sheffield and Roma in Glasgow resulting in the Roma populations in each city having different welfare needs and therefore, different experiences when they attempted to access their rights as EU citizens in the UK. Nevertheless, the findings in this section also go beyond the findings in Chapter 4, in that they highlight that the protections offered to EU citizens who were engaged in the grey labour market were being undermined by bureaucratic practices in the UK. As we will see below, this was highly problematic because an EU citizen could have been administratively removed from the UK if they were deemed not to be exercising their treaty rights (see Chapter 5).

Section 3: The Economic Strategies Employed by Roma EU Citizens in Sheffield and Glasgow

Having explored the similarities and the differences between the ways in which Roma EU citizens experienced the constraints of multi-level citizenship in Sheffield and Glasgow, this final section is concerned with the similarities and differences in economic strategies that Roma EU citizens employed at the local level post-2014. As noted in Chapter 3, the 2008 financial crisis not only made the labour market position of Roma EU citizens more precarious but also led to increased activity within the grey labour market. The impact of these changes in the paid labour market would have differed depending on the point at which an EU citizen had migrated to the UK, with the employment networks of those who migrated in 2004, for example, having been established in less precarious labour market sectors (see Chapter 3). In this regard, those Roma who had migrated to the UK before

the 2008 financial crisis can be seen to have had significant advantages when compared to Roma EU citizens who migrated post-2008 because, having been resident in the UK for a significant period of time, they were less likely to be engaged in highly precarious forms of employment. This was reflected in the findings of this project with the more recent arrivals highlighted by key policy stakeholder respondents - Roma from rural areas of Slovakia in Sheffield and Romanian Roma in Glasgow (see Table 2: Roma settlement in Sheffield and Glasgow) - enacting economic strategies designed to permit them access to social assistance provisions post-2014.

In Sheffield, Roma EU citizens had been submitting fictitious claims for DLA for their EU national children (see Sheffield City Council, 2019). In the UK, a claim for DLA also permitted an EU citizen access to Child Tax Credit, Housing Benefit and Carer's Allowance. As a key policy stakeholder respondent explained:

With Roma there are issues, allegedly, around claiming benefits. People kind of go to the stage of going 'oh my child's got an incontinence issue' so I get benefits and it increases my income. (SKPS10: Local Councillor, Male).

The economic strategy employed by Roma in Glasgow however differed from that employed by Roma in Sheffield. As noted in Chapter 5, the introduction of the MET not only redefined the status of EU workers, but it also redefined the forms of work that count as work at the UK level with self-employed workers being required to show that their business had turned a profit of £162 per week. Concerns about the effect that the MET was having on self-employed workers were expressed in statements from key policy stakeholders in both cities:

More concerning in a way [...] the guidance issued by DWP, applies the same marginality test to the self-employed. Now actually the rules don't say that. I mean as far as self-employment is concerned it's meant to be genuine and effective, there's nothing about marginality because that reflects the reality of self-employment which is when you're establishing yourself in business you may not earn anything for a while, you

know, in fact you may owe everybody money for years before you actually turn a profit, you know, that's how everybody started out, you know, it's how Richard Branson started out [...] so, basically they're applying a completely inappropriate test. (SKPS08: Policy Advisor, Female)

So, for most people, it [the MET] doesn't seem to be a particular issue, we still do have some clients who are self-employed Big Issue sellers in particular who are, you know, still earning kind of significantly below that tier one threshold and they are being turned down on the basis that, you know, that they don't satisfy that [...] they seem to be, you know, seen as doing marginal and ancillary work in a way that five years ago they wouldn't have been. (GKPS08: Advice Worker, Male)

Nevertheless, not only did Glasgow have a significant Romanian Roma population (see Table 2: Roma settlement in Sheffield and Glasgow) but prior to 2014, A2 EU citizens' access to PAYE employment was restricted (see Chapter 3). The introduction of the MET was thus found to have had a significant detrimental impact on Romanian Roma EU citizens with several key policy stakeholders in Glasgow (see Chapter 4) noting that Romanian Roma EU citizens had switched *en masse* from self-employment to PAYE following the introduction of the MET:

[P]eople did shift from, you know, from being almost all self-employed one way or another to being employed in particular sectors, you know, from the beginning of January 2014 onwards, you know, so yeah to that extent it's changed quite significantly (GKPS08: Advice Worker, Male)

The employers who were offering Romanian Roma EU citizens employment in Glasgow were however found to be employers who often offer migrant workers self-employed work in the grey labour market (see Chapter 5). It is not in the interests of employers who wish to engage migrants in the grey labour market to provide them with PAYE employment because false self-employment permits the employer to not only lower their labour costs and avoid their tax and national insurance contributions

(see Chapter 3). Romanian Roma EU citizens, therefore, were found to be using fictitious employment contracts and payslips - i.e. employment contracts that stated that they were working 24 hours per week (the minimum required to meet the conditions of MET) when they were in fact working significantly more hours - in their Working Tax Credit applications (see Chapter 5). As an overwhelming majority of key policy stakeholders in Glasgow reported:

I suppose the way that employer's kind of exploit and appease like Roma workers is by providing them with enough documentation where like Roma families can access benefits. They'll give them like contracts where it says that they work 24 hours which is enough for them to get access, or it was enough for them to get access [in reference to UC (see Conclusion)], to benefits. In reality most people work like 60 hours a week and they're getting paid £30 per day for like 10 or 12 hour shifts. It is not easy work, it is exploitative and just based on what I've been told by clients it's humiliating but it's better than what you encounter in Romania and other similar countries (GKPS10: Development Worker, Female)

Somehow, they got this information [...] they got this information that as long as they work 24 hours per week between the two of them, I'm talking about partners, they are able to claim working tax credits so then nobody works full time, they're all part-time, they're all 24 hours. But then all these employers are Asian as I said so I got this feeling that, you know, there's some sort of mutual agreement really between employers and the Romas. So they are all employed 24 hours per week and no more where in reality they probably work more than that and that suits the employers as well, you know, [...] it would just be a huge coincidence that you've got hundreds of clients and they all work 24 hours a week, you know, it just doesn't make sense. (GKPS14: Sessional Worker, Female)

The differences in the economic strategies employed by Roma in Sheffield and Glasgow can be explained in relation to the differing welfare needs of the Roma populations at the local level. In EU law, DLA is classified as 'cash sickness benefits' and so can only be claimed by economically inactive EU citizens, while Tax Credits are classified as social assistance benefits and so can only be claimed by EU workers (see Table 3: Overview of EU social welfare provision in the UK).

There were, however, similarities and differences in the state's response to the economic strategies employed by Roma EU citizens at the local level. In Sheffield, Roma EU citizens' claims for DLA were discovered by the Multi-Agency Support Team - a Sheffield City Council team that responds to requests for a service about a child or young person - as many of the referrals into the service had been in relation to this (see Sheffield City Council, 2019).

In contrast, in Glasgow, and as noted in Chapter 5, the primary response to Roma EU citizens economic strategies was 'Operation Mighty' – an operation involving Police Scotland, the Home Office, HMRC, DWP and the National Crime Agency - which claimed to have uncovered nearly £1 million in fictitious Tax Credit claims.

The scale of the state's response to the economic strategies employed by Roma EU citizens in Sheffield and Glasgow can be seen to differ significantly for three key reasons. First, the Roma populations in Sheffield and Glasgow had different welfare needs. This resulted in Roma engaging with different social providers at the local level and so, being subjected to differing assessments with claims for DLA, for example, being submitted through DWP - i.e. an organisation that assesses claim through interaction with DWP staff - and claims for Working Tax Credits being submitted to HMRC - i.e. an organisation that assessed all EU citizens' claims using surveillance technology (see Chapter 5).

Second, the A2 and A8 Roma populations in the UK would have had different experiences of applying for social assistance provisions as EU workers prior to 2014 because while A8 EU citizens had unlimited access to the paid labour market from 2004 onwards, A2 EU citizens did not receive unlimited access to the paid labour market until 2014 (see Table 1: The rights of CEE EU citizens

during the transitional periods in the UK). This is important because it is through interactions with the state, particularly when applying for in-work benefits provisions, that migrant workers gain an understanding of the types of work that are socially accepted. Thus Nagy (2016a) documented the economic strategies that A8 Roma employed prior to 2014 in order to make their grey labour market employment appear to conform to socially defined labour market norms (see Chapter 5). Whilst self-employed, and in line with the A2 restrictions (see Table 1: The rights of CEE EU citizens during the transitional periods in the UK), Romanian and Bulgarian Roma would, however, have been responsible for submitting their own Tax and National Insurance data to HMRC. A consequence of this, when the A2 restrictions eased and they were able to access PAYE employment post-2014, was that they lacked familiarity with the types of employment that conformed to socially defined market norms: this left them unwittingly exposed and vulnerable to HMRC's surveillance gaze (see Chapter 5).

Third, the concentration of Roma differed quite significantly at the local level with 90% of Scotland's Roma population located within the Govanhill area of Glasgow (see Chapter 4). This would have made it very easy for HMRC to target Roma EU citizens in Glasgow, with their surveillance technology able to uncover hidden relationships between organisations and their associated data links (see Chapter 5). As a key policy stakeholder respondent in Glasgow noted:

[T]he suspicion of fraud being carried out, you know, when it comes to making benefit claims because there seems to have been that on a fairly large scale but that just affects everybody, you know, everybody's being tarred by the same brush and I think, although it is a suspicion because I don't have data to compare, it seems to me as though if you are Romanian and you live in a G42 postcode you're going to find the likelihood of your benefits being stopped and having more difficulty to restart much, much more likely than elsewhere. (GKPS08: Advice Worker, Male).

These differences in the concentration of Roma at the local level can, of course, be linked to the demand for migrant labour in Sheffield and Glasgow (see Chapter 4). Nevertheless labour market policy is driven by actors at the EU, UK, national and local levels (see Chapter 1). This was particularly apparent in the case of Glasgow. Through the provision of services designed to support Roma to legalise their status as EU workers (see Chapter 4), Scottish policy towards Roma (see Chapter 3) more actively sought to attract A2 Roma to Scotland (see Chapter 1). The result of this was that a sizeable and particularly vulnerable community of Roma EU citizens settled within a one mile radius in Scotland (see Chapter 4). The local level can thus be seen to be intimately related to the scale of the state's response to the economic strategies employed by Roma in Glasgow post-2014. This sentiment was shared by a key policy stakeholder in Glasgow who noted:

I did a talk back in 2013, just before Romania and Bulgaria got full accession [end of transition period] and it was all the community groups in the area and what I said at the time was [...] 'I can't stand here and say for definite that you're going to create a wave of crime, what I am saying is you're creating the perfect circumstances for criminal activity to take place.' (GKPS05: Welfare Advisor, Female)

Nevertheless, the outcome for Roma EU citizens remained largely the same in both locales. As noted in Chapter 5, EU citizens could be deported from the UK if they were convicted of a crime. At the time of the fieldwork in Sheffield, those Roma EU citizens who had submitted fictitious claims for DLA were under investigation for benefit fraud. As a key policy stakeholder in Sheffield explained:

So there's some organised benefit fraud going off [...] that's obviously an on-going case, I can't talk too much about that. We're fully aware of it and it's being investigated at the moment (SKPS06: Community Services Manager, female).

If convicted of benefit fraud, these Roma EU citizens would likely be deported from the UK.

The denial of EU worker status, however, also had significant implications for EU citizens in that it not only rendered them ineligible for social assistance provisions but also meant that they were more likely to be referred to immigration authorities (see Chapter 5). Thus several key policy stakeholders in Glasgow explained that those involved in 'Operation Mighty' had been arresting and detaining Romanian Roma, refusing them entry at Scottish airports and administratively removing them from UK territory (see Chapter 5). It is worth quoting one such respondent at length:

The other thing that happened, I think is still happening in the background now and was definitely at the forefront of this hostile environment I'm describing happened maybe like September around about a year ago maybe when a series of questioning, investigations and deportations started in the Romanian Roma community some of them based on like benefit fraud but it definitely, definitely felt like a very disproportionate reaction to a non-violent crime where people would just sort of be taken from the street and taken to like an interviewing room at the Home Office, then they would be given an interview without an interpreter which I think is not adequate when someone's like full rights and like livelihood is at stake then if the answers weren't you know, satisfactory or again like the boss was called or they couldn't produce the contract they get put in Dungavel, which is a detention centre, where either their families would help them to get a lawyer and then they'd be able to like go back on the decision of getting a deportation, like administrative removals, or they would get deported or administratively removed. (GKPS11: Development Worker, Female)

In analysing the similarities and differences in economic strategies that Roma EU citizens employed at the local level post-2014, it becomes clear that the 2014 welfare changes not only limited Roma EU citizens' access to benefits but also their access to UK territory, replicating centuries of discrimination and economic exclusion experienced by Roma groups (see Chapter 5). However, the means through

which this exclusion took place differed at the local level. The local level, therefore, can be seen to be intimately related to the state's response to the economic strategies employed by Roma post-2014.

Conclusion

This chapter has utilised the abductive research strategy (see Chapter 2) in order to explore the similarities and differences between the ways in which Roma EU citizens experienced the constraints inherent to multi-level citizenship in Sheffield and Glasgow (see Chapter 1). The aim of the abductive research strategy is to uncover the mutual knowledge, symbolic meanings, intentions and rules that provide direction to the everyday lives of the research participants (see Chapter 2). However, the abductive research strategy goes beyond a 'bottom-up' account of research participants' social worlds in that it seeks to develop social scientific concepts and theories from these lay accounts (see Chapter 2). The key advantage of this approach is that it allows for data generation, data analysis and theory development to take place in a dialectical and iterative manner and so, findings of the research project are 'theoretically saturated' because they were developed in relation to existing theories and perspectives (see Chapter 2).

The findings presented in this chapter largely confirm the findings of previous research (Dagilyte and Greenfields, 2015; Greenfields and Dagilyte, 2018; Dinu and Scullion, 2019) with the 2014 welfare changes not only limiting Roma EU citizens' access to welfare benefits in the UK but also reducing their access to UK territory. However, this chapter expands on existing research (Dagilyte and Greenfields, 2015; Greenfields and Dagilyte, 2018; Dinu and Scullion, 2019) in two key ways.

First, the existing literature on the impact of the 2014 changes for Roma families (Dagilyte and Greenfields, 2015; Greenfields and Dagilyte, 2018) does not engage with the question of Roma EU citizens' access to social assistance provisions as EU workers (see Chapter 5). In contrast, this chapter has shown not only the impact that the introduction of the MET had on Roma EU citizens, but also the importance of different definitions of work at the UK and EU levels (also see Chapter 4).

Second, within this PhD research project, EU citizenship was conceptualised as multi-level and so, while the existing literature (Dagilyte and Greenfields, 2015; Greenfields and Dagilyte, 2018; Dinu and Scullion, 2019) has largely sought to understand how Roma in England experienced the constraints inherent within the EU citizenship framework, this chapter has addressed the similarities and differences pertaining to how Roma in Sheffield and Glasgow experienced those same constraints. In so doing, it has brought to the fore not only the importance of the differing labour market access in Roma EU citizens' experiences, but also the different ways in which the securitizing and exclusionary potential within EU law (see Chapter 1) was exercised at the local level post-2014. This contribution is important because it shows that local level governance structures were intimately linked not just to the experiences of Roma EU citizens at the local level within the UK, but also to their exclusion from a former EU member states' territory. As such, this chapter also contributes to the literature that has engaged with the question of Roma EU citizens in Europe and the literature that has engaged with the topic of Roma EU citizens' experiences of multi-level citizenship. To do this, it has both highlighted the inherent tendency within EU law to exclude Roma as well as the ways in which the constraints inherent to the multi-level citizenship framework could and did differ within a single EU member state (see Chapter 1).

Having explored the constraints presented to Roma EU citizens by multi-level citizenship (see Chapter 5) and the ways in which Roma experience these constraints in Sheffield and Glasgow, the concluding chapter reflects on the ways in which multi-level citizenship was experienced by migrant Roma in the UK (see Chapter 1), the implication of the research for Roma EU citizens in Europe, the changing legal and political contexts since the research was conducted, and the implications of the research for policy moving forward. Brexit and the legal and policy changes that it entailed are central to the discussions in the concluding chapter because while the research was conducted prior to the UK's departure from the EU, this thesis not only raises important questions about the status of Roma in the UK post-Brexit, but has also shown that multi-level citizenship both imposed constraints upon Roma in the UK and offered Roma opportunities to improve their quality of life.

Conclusion

Having analysed the opportunities and constraints that multi-level EU citizenship offered and imposed on Roma EU citizens resident in the UK (see Chapters 3 and 5) and the ways in which they were experienced similarly or differently by migrant Roma in Sheffield and Glasgow (see Chapter 4 and 6), this PhD thesis has investigated EU citizenship as a 'conditional promise' (Dwyer *et al.*, 2019) through the prism of Roma EU citizens' experiences in Sheffield and Glasgow (see Chapter 1). This conclusion begins by summarising the key findings of the project and offering explicit answers to the guiding research questions.

In the second section, it explores the implications of the research for Roma EU citizens in Europe and EU citizenship more generally. Section 3 is concerned with the contributions that the research has made to the existing literature as well as the limitations of the research and the changing legal and political context since the research was conducted. In light of the changing legal and political context, Section 4 provides an overview of recent policy changes – focused in particular on post-Brexit policy towards EU citizens and the introduction of UC – and considers the implications of my research in light of those changes. The chapter concludes by reiterating the key points raised.

Section 1: Research Findings

This core research questions of the thesis were as follows:

Central Research Question: How was multi-level citizenship experienced by migrant Roma in the UK?

Sub-Questions:

1. What opportunities did multi-level citizenship offer to migrant Roma in the UK?
2. What constraints did multi-level citizenship impose on migrant Roma in the UK?

3. How were the opportunities and constraints of multi-level EU citizenship experienced similarly or differently by migrant Roma in Sheffield and Glasgow?

This section aims to offer brief answers to these sub-questions in turn, drawing on the findings from chapters 3-6. First, however, it briefly restates the motivation for asking these questions and the approach that was taken to answering them.

Roma are the largest and most discriminated against ethnic minority group in Europe (see Chapter 1). As such, the inclusion of Roma within Europe has been a priority for the EU for a considerable period of time. Prior to the A8 and A2 enlargements, and in contrast with previous enlargements, the key principle of conditionality was enshrined within the Copenhagen Criteria. The Copenhagen Criteria required that candidate states had achieved stable institutions guaranteeing democracy, the rule of law, respect for human rights and the protection of minorities, as well as a functioning market economy (see Chapter 3). However, while the protection of minorities' civil and political rights was made a condition of EU membership, the material conditions of Roma minorities in CEE countries were addressed through the non-binding Framework Convention for the Protection of National Minorities (Chapter 1). As such, the candidate countries largely ignored the social and economic rights of Roma and so, rather than improve the material conditions of Roma in CEE countries, the Copenhagen Criteria reinforced and reshaped pre-existing racialised understandings of Roma as economically 'inactive' (see Chapter 1).

Endemic discrimination towards Roma continues in the CEE region today (see Chapter 3) and so, the right to free movement and non-discrimination on the grounds of nationality presents Roma EU citizens resident in CEE countries with the opportunity to escape endemic discrimination and make a better life for themselves within Europe (see Chapter 3). However, the endemic discrimination that Roma experience in CEE countries has resulted in Roma EU citizens subsequently experiencing considerable barriers when they attempt to engage in the paid labour market in their 'host' member state (see Chapter 3).

The UK presented an interesting context for exploring the ways in which Roma experienced EU citizenship because not only is the UK home to a substantial Roma population, but the politicisation of free movement, and in particular Roma free movement, in the UK has resulted in the rights of EU citizens being rescinded at the member state level (see Chapter 1). Nevertheless, Roma EU citizens' experiences may also have differed at the local level for three reasons. First, Scotland and England have different needs for migrant labour (see Chapter 1). Second, there are differences within the paid labour markets, local governance structures and approaches to migrant inclusion (see Chapter 3). Third, there were differences within the Roma populations (see Chapter 4). This thesis provides an illustration of the concept of multi-level citizenship (Maas, 2007; Maas, 2013b; Faist, 2001) in practice with reference to a vulnerable group of EU citizens *within* an EU member state (see Chapter 1).

In order to do so, it utilised the abductive research strategy (Blaikie, 2007; 2010) because the focus on both broader economic, legal and local bureaucratic structures ('top-down') and the lived experiences ('bottom-up') of Roma allowed for an exploration of the realities of multi-level citizenship. Or, in other words, it allowed me to engage in a dialogue between EU citizenship theorised as multi-level citizenship (Maas, 2007; 2013b; Faist, 2001) and the data that emerged on the lived experiences of Roma in Sheffield and Glasgow. As Layder (1998: 27) notes:

[A]daptive theory focuses on the construction of novel theory in the context of ongoing research by utilizing elements of prior theory in conjunction with theory that emerges from data collection and analysis [...] The theory that results from such an interchange and dialogue always represents an attempt to depict the linkages between lifeworlds and system elements of society [...] Adaptive theory is accretive, it is an organic entity that constantly reformulates itself both in relation to the dictates of theoretical reasoning and the 'factual' character of the empirical world. Prior theoretical concepts and models

suggest patterns and 'order' in the emerging data while being continuously responsive to the 'order' suggested or unearthed by the data themselves.

Thus, the combination of the multi-level citizenship perspective (Maas, 2007, 2013b, Faist, 2001)- with its focus on the levels and the importance of different places and times - and the abductive research strategy - with the focus on both the lived experiences of Roma EU citizens ('bottom-up') and the economic, legal and local bureaucratic structures ('top-down') allowed me to both confirm and expand on the findings of the existing literature that has engaged with the question of opportunities and constraints for Roma EU citizens in the UK (Paterson *et al.*, 2011; Clark, 2014a, 2017; Dagilyte and Greenfields, 2015; Nagy, 2016a; Martin *et al.*, 2017; Greenfield and Dagilyte, 2018; Dinu and Scullion, 2019; Humphris, 2019). And to contribute to the literature that has engaged with the question of opportunities and constraints for mobile Roma EU citizens in the EU (Aradua, 2009; van Baar, 2011; Parker, 2012; Carrera, 2014; Parker and López Catalán, 2014).

This PhD thesis has analysed how multi-level citizenship was experienced by migrant Roma in the UK (see Chapter 1) from both the 'top-down' and the 'bottom-up' (see Chapter 2). In doing so, it has shown that migrant Roma's experiences of multi-level citizenship in the UK differed both in time and space (see also Parker and López Catalán, 2014). Chapter 3 adopted a 'top-down' approach - i.e. it presented an overview of the legal and policy frameworks at the EU, UK, national and local levels - in order to explore the opportunities that were presented to Roma EU citizens in the UK by multi-level citizenship. In so doing, it found that the opportunities available to Roma may not only have differed at the local level but may also have changed over time. In contrast, Chapter 4 adopted a 'bottom-up' approach - i.e. it presented Roma EU citizens' experiences - in order to understand the similarities and differences in the ways in which migrant Roma experienced the opportunities created by multi-level citizenship in Sheffield and Glasgow. In so doing, it found not only that the opportunities available to Roma differed at the local level but also that they had changed over time. These insights are important because while the local level is often forgotten within both the UK and EU literature that

has considered Roma EU citizens' experiences of the constraints inherent within the legal and policy framework of EU citizenship (see Chapter 1), we would expect to see differences in Roma experiences of the constraints given the differences in the opportunities available to them. In Chapter 5 then, we explored the constraints inherent in the legal and policy frameworks at the EU and UK levels from the 'top-down' with the aim of highlighting the constraints that multi-level citizenship may impose on migrant Roma at the local level. This exploration revealed not only that the UK context was a particularly challenging one for vulnerable EU citizens, but also that the constraints inherent in the multi-level citizenship framework had changed over time. Finally, Chapter 6 adopted the 'bottom-up' approach in order to assess the ways in which the constraints created by multi-level EU citizenship had been experienced similarly or differently by Roma in Sheffield and Glasgow with local governance structures not only leading to Roma having very different experiences in Sheffield and Glasgow but also being intimately related to the exclusion of Roma EU citizens from a former EU member state. In other words, this chapter showed that the interaction of different levels of citizenship had feedback effects on another level (see Chapter 1).

More specifically, I have answered the above Sub-Research Questions as follows. The opportunities offered to migrant Roma by multi-level citizenship in the UK were two-fold. First, free movement was found to have allowed Roma EU citizens to escape endemic discrimination in CEE countries (see Chapter 3). Second, the combination of a liberal labour market and liberal welfare system was found to have permitted Roma EU citizens to access the economic benefits of free movement and so create a better life for themselves and their families (see Chapter 3).

Nevertheless, the constraints that multi-level citizenship imposed on migrant Roma in the UK were to be three fold. First, the legal and policy frameworks at the EU and UK levels limited Roma EU citizens access to state support as EU Jobseekers (see Chapter 5). Second, the legal and policy framework at the UK level limited Roma EU citizens' access to state support as EU workers. Third, as it was the legal

and policy framework at the EU and UK levels that permitted or denied EU citizens legal residence in the UK, they also limited Roma EU citizens access to the UK territory (see Chapter 5).

In terms of the ways in which the opportunities of multi-level EU citizenship were experienced similarly by migrant Roma in Sheffield and Glasgow: Roma experiences of free movement were largely the same in both locales with free movement having permitted them to escape endemic discrimination, access economic opportunities and access higher status forms of employment in the UK (see Chapter 4). Nonetheless, the opportunities of multi-level EU citizenship were also experienced differently by migrant Roma in Sheffield and Glasgow as not only did the labour market opportunities available to Roma differ, but so did the opportunities created by inclusion policies at the local level (see Chapter 4).

Finally, in terms of the ways in which the constraints of multi-level EU citizenship were experienced similarly by migrant Roma in Sheffield and Glasgow: Roma experiences of the constraints were largely the same in Sheffield and Glasgow with the legal and policy frameworks at the EU and UK levels limiting not only Roma EU citizens' access to state support as both EU workers and EU Jobseeker but also their access to UK territory (see Chapter 6). However, the ways in which migrant Roma experienced the constraints of multi-level EU citizenship were also found to differ in accordance with not just their access to the paid labour market at the local level but also the forms of economic activity that they were engaged in (see Chapter 6).

Thus in summary there was no singular experience of being a Roma EU citizen in the UK. In engaging in a dialogue between EU citizenship theorised as multi-level and the data that emerged on the lived experiences of Roma in my two research contexts, this PhD project has captured the nuances of citizenship in practice both at different levels and in different places and times (Maas, 2013b: 6) (see also Chapter 1) and so confirmed the insights of the multi-level citizenship literature (Maas, 2007; 2013b; Faist, 2001). In addition, this PhD has built on, confirmed and added to the literature that has engaged with the question of opportunities and constraints for mobile Roma in the UK (see Section

3). And finally, it has also contributed to the discussion of Roma in Europe more generally and Roma EU citizens' experiences of multi-level citizenship in Europe in particular.

Section 2: Implications for Roma in Europe

This section explores the implications of this PhD research project for Roma EU citizens in Europe and EU citizenship more generally. The free movement of Roma within Europe has been subject to significant controversy with Roma being collectively expelled from Italy in 2008 and targeted and deported from France in 2010 (see Chapter 1). As a result, the EU Framework for NRIS up to 2020 was established. NRIS called on all EU member states to develop targeted and integrated approaches to Roma inclusion in order to address the situation of Roma in relation to education, employment, health and housing (see Chapter 3). However, not only did the NRIS place considerable emphasis on economic inclusion as the core challenge for Roma (see Chapter 3) but the legal framework at the European level has increasingly made the residence rights of EU citizens dependent upon their engagement in the paid labour market in their host member state (see Chapter 5).

In essence, the principle of proportionality should act as a balancing mechanism between EU citizens and the EU's member states, with any limitations on the exercise of free movement only being permitted when they meet the objectives and interests of the EU or the need to protect the rights and freedoms of others (see Chapter 5). As such, not only is proportionality one of the core general principles of EU law, but it is one of the key measures to promote European solidarity (see Sauter, 2013). However, since 2010, ECJ case law has made it increasingly permissible for member states to restrict access to social rights for the economically vulnerable.

This PhD thesis has thus highlighted the intersections of the legal and policy frameworks at the EU and UK level when determining the rights and subsequently the experiences of Roma EU citizens resident in the UK with the decision to restrict EU Jobseekers access to Housing Benefit, for example, being directly linked to the ECJ's decision in *Alimanovic* (see Chapter 5). However, the UK's approach

to free movement rights could arguably also be seen to go beyond what was permitted in EU law (see Chapter 5). In 2016, the European Commission asked the ECJ to decide whether the UK's approach was lawful (see Chapter 5). The ECJ condoned the UK's approach on the grounds that it was indirectly discriminatory rather than directly discriminatory (see Chapter 5). However, the UK's right to reside test was not 'more easily satisfied' by UK citizens, it was always and automatically satisfied by UK citizens (O'Brien, 2017). Accordingly, O'Brien (2017: 273) notes that:

The UK's cautionary tale to the EU is one of the perils of ignoring questions of social justice and of manufacturing rights that reward the well-off and instrumentalise the poor. To the other Member States, the cautionary tale is one of the corrosive effects of declaratory discrimination. Discriminatory law making does not promote solidarity and tolerance, and it does not make populations feel sufficiently accepting of each other's nationals so as to vote to remain in the EU. It promotes discrimination. It segregates EU nationals within the administrative processes and 'others' them, subjecting them to different requirements, different conditions and different exclusions.

Roma EU citizens are not strangers to discrimination and segregation (see Chapter 1) and so, while the measures enacted by the Westminster government in 2014 were targeted at all low-paid precarious EU workers resident in the UK, Roma themselves understand processes that sort workers based on their financial parameters as ethnic targeting (see Chapter 5). Thus, a small number of Roma EU citizens in Sheffield and Glasgow responded to the changing legal and policy framework by enacting economic strategies and were removed from the UK as a result (see Chapter 6). In permitting the discrimination of economically 'inactive' EU citizens, the legal framework of EU citizenship may not only condone, but also promote, the ethnic targeting of Roma (see also Patel et al., 2022).

That said, there have been some changes in EU law since this project's fieldwork was completed (see Chapter 2). In *G.M.A v État belge* (Case C-710/19, *G.M.A.*), a Greek national (*G.M.A.*) who had moved

to Belgium to seek employment was denied residence as an EU Jobseeker - i.e. residence that extended beyond the initial three month period outlined in Directive 2004/38/EC - as he failed to demonstrate a 'genuine chance of being engaged' in the paid labour market. As a result, the ECJ was asked to consider whether EU member states are required to allow EU Jobseekers a reasonable period of time to find suitable employment and whether this period of time should be no less than six months and cannot be conditional upon proving a real chance of employment. Relying on the judgement in *Antonissen* (see Chapter 5), the Court reiterated that providing EU citizens with a reasonable timeframe in which to seek employment is necessary, before finding that the reasonable period starts at the point at which the EU citizen registers as a Jobseeker. As such, the initial findings of the ECJ added a small caveat to the *Antonissen* (see Chapter 5) judgement in that they clarify when the reasonable period should begin. This is important because at the time that the fieldwork for this PhD project was undertaken (see Chapter 2) those EU citizens who had previously worked but then became EU Jobseekers without retaining worker status were treated less favourably than newly arrived EU citizens (see Chapter 5). Consequently, the judgement in *G.M.A* ends this privileged treatment of newly arrived EU citizens (see Chapter 5) because the ECJ found that the reasonable time period should begin at the point of registration as a jobseeker, regardless of whether or not this registration occurs in the first three months of residence (Welsh, 2021).

However, the Court also went further in that it set a timeline for when certain conditions should be applied. The Court decided that in the first three months of residence an EU Jobseeker cannot be required to prove either that they are seeking employment or have a genuine chance of being engaged in employment. Furthermore, in the second period, the EU Jobseeker must seek employment but cannot be required to show that they have a genuine chance of being engaged. While in the third period of residence as an EU Jobseeker, the EU citizen is required to show that they are both seeking employment in their host member state and that they have a genuine chance of being engaged in the paid labour market (Case C-710/19, *G.M.A*). As documented in Chapter 5, after an EU Jobseeker had been receiving JSA for a period of three months, they were previously required

to pass the GPOWT. However, the ECJ judgement in *G.M.A* means that no judgement can be made in relation to an EU citizens' chances of being engaged within the paid labour market until they have had a reasonable period of residence. Accordingly, the judgement could contradict the approach taken in the UK and a number of current EU member states (Welsh, 2021). However, the judgement did not assess EU jobseekers' access to social assistance benefits in their host member state (see Table 3: Overview of EU social welfare provision in the UK) but rather the ability for a jobseeker to continue to reside lawfully in a host member state. Accordingly, Welsh (2021: 1609) notes that:

While the ECJ in this case and *Antonissen* relied on ensuring the effectiveness of the free movement of workers and jobseekers, it begs the question, for whom are the rules effective? For many, it is likely that a lack of unemployment benefits will be a barrier that is just as prohibitive to free movement than [sic] an early exposure to the 'genuine chance of being engaged' condition.

Therefore, while the judgement reinforces an EU Jobseeker's ability to stay in the host member state for a reasonable time without being exposed to the subjective conditions imposed post-2014 in the UK, the ECJ's failure to consider the structural barriers that exclude jobseekers from the paid labour market and in particular the exclusion of jobseekers from social assistance provisions limits the effectiveness of this judicial intervention for those who already experience discrimination (Welsh, 2021).

It is, however, possible to improve the situation of mobile Roma in Europe. As we saw in Chapter 5, the trajectory of the ECJ has elevated the conditions of the Directive [i.e. secondary law] into the position of constitutive elements of the basic right to equal treatment [i.e. primary law] meaning that those not meeting those conditions are simply ineligible for protection against non-discrimination. Nonetheless, the reaffirmation of the primary law as well as the reintroduction and re-enforcement of proportionality would not only re-establish the right to non-discrimination on the grounds of nationality in EU law but would also require that departures from equal treatment

could only take place when they were not disproportionate (O'Brien, 2017). Proportionality however is not enough. O'Brien (2017) has suggested a second revision to the legal framework at the supra-national level - the importation of principles of social justice into EU law such as, for example, the protection of child welfare and the promotion of gender and racial equality. This approach would raise the questions of need and vulnerability when making decisions and so not only facilitate an assessment of the disproportionate impact of welfare restrictions (O'Brien, 2017) but also prevent the ethnic targeting of Roma EU citizens at the member state level (see O'Nions, 2015; O'Nions, 2016).

Section 3: Contributions and Limitations

This section is concerned with the contributions that the research has made to the existing literature as well as the limitations of the research. As outlined in Chapter 1, this project makes three contributions to the existing literature.

First, this PhD project provides an illustration of the concept of multi-level citizenship (Maas 2007; 2013; Faist, 2001) in practice, with reference to both a vulnerable group and the local level within an EU member state. In so doing, it builds on and adds to Parker and López Catalán's (2014) work on the contingent nature of post-national citizenship. Their work (Parker and López Catalán, 2014) emphasised the different ways in which Roma resident in France and Spain experienced multi-level citizenship. This PhD project, in contrast, has emphasised the ways in which Roma EU citizens resident *within the same member state* experience their EU citizenship status similarly or differently at the local level.

Second, much of the literature that has engaged with the question of opportunities and constraints for Roma as EU citizens in Europe has focused on the removal of Roma from France and Italy (Aradua, 2009; van Baar, 2011; Parker, 2012; Carrera, 2014). This research project confirms the findings in the existing literature that has engaged with the question of Roma as EU citizens in Europe

in that it has confirmed that the legal framework at the EU level provides opportunities to exclude (and remove) Roma. However, the research also goes beyond the literature that has interrogated the ‘irregularisation’ (see Chapter 1) of Roma mobility in Europe, in that it has also shown the ways in which structures at the local level are intimately related to the exclusion of Roma at the member state and EU levels (see Chapter 6) (see also Parker and López Catalán, 2014).

Third, the project builds on the limited literature that has engaged with the question of opportunities and constraints for Roma as mobile EU citizens in the UK (Paterson *et al.*, 2011; Clark, 2014a; 2017; Nagy, 2016a; Martin *et al.*, 2017; Dinu and Scullion, 2019; Humphris, 2019) and in particular adds to the literature that has focused on constraints for Roma families post-2014 (Dagilyte and Greenfields, 2015; Greenfields and Dagilyte, 2018). As noted in Chapter 1, much of the literature that has engaged with the question of opportunities and constraints for mobile Roma in the UK has either not engaged directly with the legal framework at the European level (Paterson *et al.*, 2011; Clark, 2014a; Nagy, 2016a; Clark, 2017; Martin *et al.*, 2017) or it took place prior to the 2014 changes to the legal rights of EU citizens resident in the UK (Humphris, 2019). This PhD research therefore builds on the work of Paterson *et al.*, (2011); Clark (2014a; 2017); Nagy (2016a); Martin *et al.*, (2017) and updates the work of Humphris (2019). Moreover, with the focus on the constraints that Roma experience when they attempt to access their rights as EU citizens post-2014, it also confirms the findings of the literature that has focused on Roma experiences of the 2014 changes on Roma (Dinu and Scullion, 2019) and in particular the literature focused on Roma families’ experiences of constraints (Dagilyte and Greenfields, 2015; Greenfields and Dagilytes, 2018). This PhD research, however, also moves beyond the insights from previous research (Dagilyte and Greenfields, 2015; Greenfields and Dagilytes, 2018) in two key ways. First, the existing literature on Roma families experiences (Dagilyte and Greenfields, 2015; Greenfields and Dagilytes, 2018) did not engage with the question of Roma EU citizens’ access to social provisions as EU workers. In contrast, this PhD has highlighted not only the impact that the introduction of the MET had on Roma EU citizens but also the importance of different definitions of work at the EU and UK levels. Second, the existing literature on the

constraints that Roma experienced post-2014 (Dagilyte and Greenfields, 2015; Greenfields and Dagilytes, 2018; Dinu and Scullion, 2019) has largely sought to understand Roma experiences of constraints in England. This PhD thesis in contrast, has addressed the similarities and differences pertaining to how Roma experienced those same constraints in Sheffield and Glasgow.

In seeking to understand how multi-level citizenship is experienced by migrant Roma in the UK, this PhD project has thus made key contributions to three different but related academic literatures (see Chapter 1). Nevertheless, the limitations of the research also have to be acknowledged. For example, I held an outside position in relation to Roma research participants, gatekeepers were used to access participants, interpreters were utilised at various points throughout the fieldwork and there was, of course, a potential for bias (see Chapter 2). However, and as discussed in Chapter 2, not only were measures taken to minimise the limitations inherent in the research design but at times throughout the research, I was also positioned by research participants as an 'insider' on account of my gender.

Finally, policy changes meant that the wider legal and political context was changing throughout the fieldwork, which was undertaken between October 2017 and October 2018 (see Chapter 2). There have been a number of legal and policy changes since the fieldwork took place. For example, UC had not been rolled out when the interviews took place in Sheffield and was introduced around a month before the fieldwork was completed in Glasgow. Additionally, and even more significantly, on the 31st of January 2020, the UK left the EU. This meant that Roma EU citizens in the UK were, after this date, no longer able to enjoy the limited rights that EU citizenship had previously offered to them, and Roma EU citizens (and other EU citizens) outside the UK were no longer able to take advantage of free movement to reside and work in the UK.

Section 4: The Post-Brexit Context

This section considers recent policy changes – focused in particular on post-Brexit policy towards EU citizens and the introduction of UC – and considers the implications of my research in light of those

changes. Despite the legal and policy changes that have taken place since the fieldwork was completed, the findings of this PhD thesis remain relevant.

As highlighted in Chapter 4, the UK was often a preferred EU member state for Roma with the combination of its liberal market economy and liberal welfare system meaning that Roma families could access economic opportunities. As such, Clark (2020: 413) reports that while some Roma families resident in Govanhill opted to return to their countries of origin after the UK's referendum on EU membership, other Roma families sought to 'get in quick' before the borders closed. The UK's departure from the EU and the subsequent end of freedom of movement means that there are now limited opportunities for Roma EU citizens who were not resident in the UK prior to 30th June 2021 to access economic opportunities in the UK. This is problematic for Roma because while some of the remaining EU member states also have a liberal market economy and liberal welfare system, for example Ireland, the UK's labour market is, of course, much larger and was the most flexible of the EU15, offering significant opportunities for work (see Chapter 1).

The UK's departure from the EU has, however, also presented both opportunities and constraints for those Roma EU citizens who were resident in the UK prior to 30th June 2021. In terms of opportunities, the so-called 'Settlement Scheme' for EU citizens offered the chance for some EU citizens, including Roma, to acquire effective permanent residence under less stringent criteria than those in operation in the context of EU law. EU citizens in the UK needed to show that they had been resident in the UK for a minimum of one day prior to 30th June 2021 in order to receive Pre-settled Status and a period of 5 years in order to be granted Settled Status. Settled Status is the equivalent of permanent residence as outlined in Directive 2004/38/EC in that it gives an EU citizen almost the same rights as a British citizen (see Chapter 5). Pre-settled, on the other hand, is an interim status that permits an EU citizen to retain their residence in the UK after the 30th June 2020. After an EU citizen who has Pre-settled status has been resident in the UK for a period of 5 years, they can then submit a further residence application which will, in principle, upgrade their Pre-settled Status to

Settled Status. Accordingly, the Settlement Scheme may have presented Roma EU citizens resident in the UK with an important opportunity to legalise their residence status and perhaps also secure permanent residence.

However, the need to register constitutes a potential constraint or obstacle for Roma citizens seeking to legalise their post-Brexit situation. Within the Withdrawal Agreement, and subsequently the UK's EU Settlement Scheme, registration is constitutive of the right to stay in the UK for EU citizens (O'Brien, 2021a). The requirement for EU citizens to register to stay in the UK not only represents a pivotal departure from the custom of EU law (O'Brien, 2021a) but may be particularly problematic for Roma EU citizens for two reasons. First, Roma EU citizens may have been reluctant to apply to the EU Settlement Scheme (O'Brien, 2021a; Yeo, Sigona and Godin, 2022) with the endemic discrimination against them meaning that many Roma continue to see authorities as a threat, particularly if they are required to register (Council of Europe, 2012). Second, Roma may not be aware of the requirement to register with the authorities (O'Brien, 2021a; Yeo, Sigona and Godin, 2022): the Roma Support Group (2020) found that considerable numbers of Roma people were not aware that they had to register to remain in the UK. Failure to register may have significant consequences for any EU citizen because, while the Withdrawal Agreement provides for a case by case consideration where the applicant has missed the deadline and the guidance for making late applications is expansive, the guidance is inevitably incomplete, and will be open to interpretation (O'Brien and Welsh, 2021). As shown in this thesis, such bureaucratic interpretation has rarely been generous with respect to Roma. The deadline for non-exceptional cases, therefore, can be seen to have created a potential cliff-edge (O'Brien and Welsh, 2021) over which many Roma may be particularly susceptible to falling (see O'Nions, 2015).

Moreover, applications to the Settlement Scheme had to be made in English and in the vast majority of cases required an internet connection. As a result, research by the Roma Support Group (2020) found that only 3% of Roma were able to submit an application to the Settlement Scheme

independently. In addition, the first thing that the Home Office verified when an EU citizen applied to the Settlement Scheme was that they were in fact an EU citizen. The Home Office stated that evidence of nationality was required in order to limit fraud and abuse of the system (Brown, Shallice and Brown, 2018: 4). However, the requirement to possess a valid national I.D. card or passport was likely to have a disproportionate impact on Roma communities (Brown *et al.*, 2018: 4) with Brown (2021: 8) reporting that 10-15% of Roma not only did not have valid identification documents but also that Roma were experiencing particular problems when they attempted to obtain these documents. Furthermore, when an EU citizen made an application to the Settlement Scheme, the Home Office consulted HMRC and DWP records in order to verify the length of residency. My research findings suggest that this may have caused problems for Roma EU citizens since those who are economically inactive, officially at least (see Chapter 5), will not appear on official records (see also Martin, 2021). To some extent, this has been acknowledged by the Home Office with the Home Offices' (2020: 73) Equality Statement stating that the automated checks may put disabled people at a particular disadvantage 'because they may find it more difficult to evidence their UK residence through the automated checks, as a smaller proportion of this cohort are in employment, and the application process may therefore be more onerous for them.' The Home Office, therefore, had attempted to mitigate any potential disadvantage suffered by disabled people by including DLA, ESA, Incapacity Benefit, PIP, AA and Severe Disablement Allowance and Carer's Allowance within the automated checks (see Home Office, 2020). However, as also discussed, not only is the paid labour market in the UK highly precarious (see Chapter 3) but the welfare system is highly conditional (see Chapter 5). As a result, not only are Roma EU citizens more likely to engage in precarious and informal forms of employment in the UK (see Chapter 4) but they are also, at least since 2014, less likely to have registered as EU Jobseekers (see Chapter 6). Accordingly, it is highly probable that Roma EU citizens will have had gaps in both their HMRC and DWP records (see also Martin, 2021).

Moreover, the Home Office opted to exclude Working Tax Credit, Child Benefit and Child Tax Credit from the automated residence checks because 'their payment does not provide reliable evidence of

UK residence' (Home Office, 2020: 71). The Equality Statement (Home Office, 2020: 71) therefore states that women may be at 'a particular disadvantage as they are more likely to be receiving these payments.' However, given that many EU families, and in particular many Roma EU families, were in receipt of these provisions, not only does the exclusion of these benefits from the automated checks disadvantage women but it may also have created a significant barrier for all low-income EU families resident in the UK.

The economic criteria inherent to the EU's legal framework (see Chapter 5) can be seen to have snuck into the Settlement Scheme through the back door (see also Martin, 2021). That said, those EU citizens who were unable to evidence their residence in the UK through the automated checks *were* given the opportunity to provide other forms of evidence in the form of payslips, lease agreements, Council Tax Bills, utility bills, annual bank statements, letters and/or appointment cards from healthcare professionals, used travel tickets and letters or certificates from schools, colleges and universities (see UK Visas and Immigration, 2021). However, this still equates to a 'greater burden of proof' (see Chapter 6) for those who were engaged in precarious forms of employment in the UK (see Chapter 4). Therefore, while the EU Settlement Scheme may have presented Roma EU citizens resident in the UK with an opportunity to legalise their residence status and perhaps also rights correspondent with permanent residence, the Settlement Scheme also presented significant constraints for Roma (Martin, 2021; Patel et al., 2022; O'Brien, 2021a).

The rights awarded to those with Pre-settled status were notably fewer and less robust. This is particularly significant for Roma because while the national average for Pre-settled Status was 42%, 62% of Roma EU citizens who applied were awarded Pre-settled Status (Brown, 2021: 8). Those with Settled Status have virtually the same rights as British citizens. However, post-Brexit UK law (specifically, Social Security (Income-related Benefits) (Updating and Amendment) (EU Exit) Regulations 2019) limits access to rights for those with Pre-settled Status (O'Brien, 2021c). Concretely, EU citizens who have been granted Pre-settled status are still required to show that they

have a right to reside – in most cases meaning that they must be employed or a registered jobseeker (see Chapter 5) - before they can access social provisions in the UK.

This requirement has been challenged twice. In 2020, the Child Poverty Action Group (CPAG) brought judicial review proceedings (*Fratilla and Tenase v SSWP 2020*) on behalf of two EU citizens: a severely disabled man and his carer, who had been refused UC on the grounds that they had limited leave to remain. On 27th of April 2020, the High Court dismissed the claim but on the 18th December 2020 permission was granted to appeal this decision. However, on 15th July 2021, the ECJ was asked to make a decision on a similar case (Case C- 709/20, *CG*). In this case an EU citizen who had lived in the UK since 2018 and was granted Pre-settled Status in 2020 made a claim for UC but this was refused on the grounds that *CG* did not have a qualifying right to reside for those purposes. The ECJ found that the claimant was not entitled to protection from discrimination on the grounds that the claimant did not meet the conditions outlined in Directive 2004/38/EC (see Chapter 5). As such, while both *Fratilla* and *CG* had a right to stay in the UK, neither were found to have a right to access social assistance benefits. This situation has been shown to have caused high levels of destitution and homelessness for EU citizens in the UK and subsequently led to their removal from the UK (*Bramley et al., 2021*).

Thus, for some Roma EU citizens - i.e. those who are able to register and subsequently secure Settled Status - the EU Settlement Scheme presents opportunities (for them it will mean an enhanced legal status). Yet, for those Roma EU citizens with a Pre-Settled Status, the constraints will be similar to those experienced by Roma when the fieldwork was undertaken. And for others - i.e. those who did not register or were unable to prove residence - the constraints will no doubt be far greater with the loss of EU citizenship legal status meaning that they will lose their right to work, rent housing, access certain hospital treatments and are potentially subject to removal from the UK (Sumpton, 2021; Yeo, Sigona and Godin, 2022; see also O’Nions, 2020).

There have also been significant changes to the welfare system in the UK since the fieldwork was completed. All Roma respondents who were in receipt of social provisions in the UK at the time of the fieldwork (see Chapter 2) were in receipt of legacy benefits. With the introduction of UC, the Westminster government replaced six existing provisions (Income Support; Income Based JSA, Income Related ESA; Housing Benefit; Working Tax Credit and Child Tax Credit) for working age people. Following the full implementation of UC in December 2018, Roma EU citizens who submit new claims for social assistance provision will be subject to the UC regime. However, UC has been classified as a social assistance provision and so, the only provision that those who have Pre-settled Status and a right to reside as an EU Jobseeker (see Chapter 5) can now access in the UK is Child Benefit.

Furthermore, UC incorporated a 'major extension and intensification of conditionality that has significant implications for the rights and responsibilities of poorer citizens' (Dwyer and Wright, 2014: 28; see also O'Brien, 2017). UC imported an 'Individual Earnings Threshold' (Dwyer and Wright, 2014) set at 35 hours per week at the National Minimum Wage (£274.05 for a single person in 2018/19). Accordingly, UC subjects low paid workers who are not engaged in full-time employment to the same requirements (to actively seek work) as they would face if they are claiming JSA (see Chapter 5). The difference between the legacy benefits system and the UC system then 'is that the reserve army now includes those in work but on low pay or low/variable hours who may be forced to seek several sub-standard jobs' (O'Brien, 2017: 109). It seems likely, therefore, that for the majority of Roma EU citizens, the stringent conditionality attached to UC will do more harm than good with research (Dwyer, 2018) having shown that some low paid British workers have chosen to relinquish their rights to housing and low wage supplements in order to avoid the obligatory work searches and work focused interviews contained within the UC regime.

That said, UC does make allowances for those who have severe disabilities, are the lead carer for someone with severe disabilities or have a limited capacity to work due to health issues and/or

caring responsibilities for a child under five years of age (DWP, 2012). Consequently, the exclusions provided to those who have a limited capacity to engage in the paid labour market may allow for a reduction in conditionality for female and disabled claimants under the UC regime (O'Brien, 2017: 167). However, while both UK citizens and EU citizens are now subject to the UC regime, it is likely to have a more significant impact on EU citizens who have been granted Pre-settled Status since they will be required not only to engage with the 'conditionality threshold' (Dwyer and Wright, 2016), but also to meet the conditions of the MET (see Chapter 5) prior to submitting a claim. Therefore, while female and disabled EU citizens may be entitled to a reduction in conditionality if they are eligible for UC, they may be ineligible in the first place due to a higher conditionality imposed by the MET (O'Brien, 2017: 167). In light of these changed realities, Roma EU citizens may be more likely to attempt to claim 'in cash benefits' (i.e. DLA) as economically inactive EU citizens (see Chapter 6). However, their access to such benefits will now, of course, be dependent on their registration in the EU Settlement Scheme.

With the introduction of both the EU Settlement Scheme and UC, the situation for Roma EU citizens resident in the UK looks likely to deteriorate overall. Nevertheless, national and local factors will also play a key role in how Roma EU citizens experience these constraints at the local level (Godin and Sigona, 2019; Godin and Sigona, 2022; O'Nions, 2016; Patel et al., 2022). For example, following the referendum on Scottish Independence in 2014, the Scottish Parliament was given additional welfare powers. Accordingly, in 2018, the Scottish Parliament passed the Social Security (Scotland) Bill. The Social Security (Scotland) Bill marks a 'distinctly Scottish approach' in that it enshrines 'respect for the dignity of individuals' (Partick and Simpson, 2020: 476) into the delivery of welfare benefits and includes the reform of PIP and DLA (Wright, Stewart and Dwyer, 2018). Moreover, UC recipients resident in Scotland also have more choice over their payment frequency and can have the housing element of their claim paid directly to their landlord (Wright, Stewart and Dwyer, 2018). As such, Roma EU citizens resident in Scotland may experience their social rights differently to those resident in England. The Scotland Act 2016 does, however, preclude any alteration of welfare conditionality in

the delivery of UK working age benefits and so, Roma EU citizens resident in Scotland would still be required to meet the conditions outlined above. Moreover, the local level will have been central to the ways in which Roma experience UC. For example, this research has shown that while there are similarities in Roma experiences of constraints at the local level, there are also differences with differing labour market opportunities (see Chapter 4) resulting in Roma EU citizens having differing welfare needs at the local level (see Chapter 6). Accordingly, it seems likely that the introduction of UC will have a more significant impact on Roma in Sheffield. Nevertheless, it also seems unlikely that those employers who had previously engaged Roma EU citizens in the grey labour market in Glasgow (see Chapter 6) will be prepared to pay Roma for 35 hours of work at the National Minimum Wage because employers who offer workers employment in the grey labour market do so in order to reduce their labour costs (see Chapter 3) - i.e. in order to pay their employees less than the National Minimum Wage.

Likewise, access to services at the local level will have a significant impact on both Roma EU citizens' ability to apply for EU Settlement Scheme Status and the likelihood of Roma EU citizens being awarded the correct status when they do apply. Roma EU citizens resident in the UK may however face a 'triple whammy of risks' with 'uncertainty over their legal status, rising concerns about hate crime, and a potential loss of EU funding for integration and support services' (Morris, 2016: 28). Thus Roma EU citizens' access to services, particularly in Glasgow (see Chapter 3), may change as a result of the UK's withdrawal from the EU. That said, not only may an SNP led government in Scotland be more willing than a Conservative led government in England to take proactive measures to support Roma EU citizens (see Chapter 3), but the UK's withdrawal from the EU may also lead to Scottish Independence and so, perhaps opportunities for Roma free movement to Scotland in the future (see Clark, 2021).

Therefore, while this research project allows us to make reasonable speculations on the ways in which Roma – in Sheffield, Glasgow and beyond – will experience and navigate their lives in

post-Brexit Britain, there is clearly a need for further research in order to test and investigate those speculations (see Benson et al., 2022; see also Eby, 2022; Eminson, 2021).

Section 5: Conclusion

This PhD project aimed to develop an understanding of the ways in which migrant Roma experienced multi-level citizenship in the UK (see Chapter 1). The UK presented an interesting context for two key reasons. First, not only is the UK home to a substantial Roma population but the politicisation of free movement, and in particular Roma free movement, in the UK has resulted in the rights of EU citizens being rescinded at the member state level (see Chapter 1). Second, since 1997 governing powers have increasingly been transferred from the Westminster Government in London to governments at the national and local levels. As such, the UK offered an interesting context for exploring multi-level citizenship in action because not only have the rights of EU citizens resident in the UK changed overtime, but different parts of the UK have been developing diverse political systems and welfare arrangements.

Sheffield and Glasgow were chosen as research sites because they housed similar numbers of Roma EU citizens and had the same legal frameworks in relation to the rights of mobile EU citizens. However, the existence of differing policy frameworks at the national and local levels meant that access to services were variously the responsibility of local authorities, NGOs and voluntary sector organisations and so these locales allowed for an assessment of both the opportunities presented to and constraints imposed on Roma by multi-level citizenship from the ‘top-down’ and the ‘bottom-up’ (see Chapter 2).

In this regard, the abductive research strategy was central to the PhD project in that it not only seeks to discover and describe the meanings and interpretations that people use in their everyday lives but it also elevates them to the central place in social science (see Chapter 2). However, once I had abstracted understandings from the meaning and interpretation that people use in their everyday lives, the abductive research strategy allowed me to supplement the understandings derived from

social actors' accounts with an explanatory account from my own point of view (see Chapter 2). I therefore analysed how the opportunities and constraints of multi-level citizenship were experienced similarly or differently by migrant Roma in Sheffield and Glasgow to identify the mechanisms that function within specific research locales and then develop an understanding of why these mechanisms were activated in some cases but not others (see Chapter 2) and found not only that there is no singular experience of being a Roma EU citizen in the UK but also that many Roma EU citizens are not engaged in the formal labour market and/or welfare state.

These findings are important for two reasons. First, Maas (2013) has shown that even within a state, local and regional authorities can develop administrative practices that discriminate between residents. However, this has not been addressed in the literature that has engaged with the topic of Roma EU citizens' experiences of multi-level citizenship in Europe (Parker and López Catalán, 2014). Accordingly, this PhD project, with the focus on the similarities and differences in Roma EU citizens' experiences in Sheffield and Glasgow, makes a central contribution to the literature on Roma EU citizens' experiences of multi-level citizenship in Europe. Second, the literature that has engaged with the topic of Roma EU citizens in the UK post-2014 (Dagilyte and Greenfields, 2015; Greenfields and Dagilyte, 2018; Dinu and Scullion, 2019) has been primarily concerned with the barriers that Roma experience when they attempt to access their rights as EU Jobseekers in the UK. However, Roma EU citizens resident in the UK not only engaged in free movement in order to access the paid labour market but were often not engaged in the formal labour market (see Chapter 4) or in receipt of out of work provisions (see Chapter 6). Accordingly, this research project has added to the literature that has engaged with the topic of Roma EU citizens in the UK in that it has highlighted the barriers that Roma experience when they attempt to access their rights as EU workers rather than EU Jobseekers.

Since the fieldwork was undertaken (see Chapter 2), there have been a number of legal and policy changes at the EU and UK level, most notably with Brexit and the introduction of UC. Brexit, of course, excludes the possibility of easy migration to the UK for the majority of EU citizens, including

most Roma. Simultaneously, for those already in the UK, their continued right to reside is conditional upon their registration for the EU Settlement Scheme. Given the substantial obstacles that they encountered pre-Brexit, it may be that many Roma experience Brexit as a less significant event in their lives than many other (more privileged) EU citizens. However, Brexit certainly provides significant extra obstacles for the most vulnerable EU citizens in the UK. As already noted, registration may prove problematic for Roma unable to access information, support and documentation. Meanwhile, those who are only able to acquire 'Pre-settled' Status but not EU worker status will struggle to access welfare rights in post-Brexit Britain, leading, in many cases, to destitution (Bramley *et al.*, 2017).

Moreover, the extension and intensification of conditionality within the UC regime (Dwyer and Wright, 2014) is also likely to have a detrimental impact on Roma EU citizens because those who are engaged in low-paid part-time work are now required to actively seek more work. Accordingly, Brexit and the introduction of UC are likely to do more harm than good for Roma EU citizens who already faced numerous challenges when residing in the UK.

That said, this thesis suggests that national and local factors will also play a key role in mediating how Roma EU citizens experience these constraints, with local services, for example, having different capacities to enable Roma EU citizens to apply to the EU Settlement Scheme and acquire the correct status. Similarly, the extension of additional welfare powers to Scotland may open up space for a less restrictive approach to social rights there and so go some way to providing access to adequate benefits and therefore social justice for the Roma population in Glasgow (see Clark, 2014a; also see Dagilytes and Greenfields, 2015).

Bibliography

Domestic Cases

Fratila v Secretary of State for Work and Pensions [2020] EWHC 998.

JA v. Secretary for Work and Pensions [2012] UKUT 122 (AAC).

Domestic Legislation

Social Security (Habitual Residence) Amendment 2004 SI 2004/1232

Social Security (Income-related Benefits) (Updating and Amendment) (EU Exit) Regulations 2019 SI 2019/872

Social Security (Jobseekers Allowance: Habitual Residence) Amendment Regulations 2013 SI 2013/3196

The Immigration (European Economic Area) Regulations 2016 SI 2016/1052.

European Court of Justice Cases

Case C-22/08 and C-23/08 *Athanasios Vatsouras and Josif Koupatantze v Arbeitsgemeinschaft Nurberg 900* EU:C:2009:344

Case C-413/99 *Baumbast and R v Secretary of State for the Home Department* EU: C: 2002: 493

Case C-316/85, *Centre public d'aide sociale de Courcelles v Marie-Christine Lebon* EU:C: 1987: 302

Case C- 709/20, *CG v Department for Communities in Northern Ireland*, EU: C: 2021:602

Case C-308/13 *Commission v United Kingdom* EU:C: 2016:436

Case C-333/13 *Elisabeta Dano and Florin Dano v Jobcenter Leipzig* EU: C: 2014: 2385

Case C -14/9 *Hava Genc v Land Berlin* EU:C: 2010: 57

Case C-710/19, *G. M. A. v. État belge* EU:C:2020:1037

Case C-67/14, *Jobcenter Berlin Neukö I In v Nazifa Alimanovic and Others*, EU:C:2015:597

Case C-85/96 *Maria Martinez Sala v Friestaat Bayern* EU: C: 1998: 217

Case C-480/08 *Maria Teixeira v London Borough of Lambeth and Secretary of State for the Home Department* EU:C: 2010: 83

Case C-140/12, *Pensionsversicherungsanstalt v Peter Brey* EU:C:2013:565

Case C-184/99, *Rudy Grzelczyk v Centre public d'aide sociale d'Ottignies-Louvain-la-Neuve* EU:C:2001:458

Case C-507/12 *Saint Prix v Secretary of State for Work and Pensions* EU:C: 2014: 2007

Case C-292/89 *The Queen v Immigration Appeal Tribunal, ex parte Gustaff Desiderius Antonissen* EU:C: 1991: 80

European Union Legislation

Directive 2004/38/EC of the European Parliament and of the Council of 29 April 2004 on the right of citizens of the Union and their family members to move and reside freely within the territory of the member states [2004]

Regulation No 883/2004 of the European Parliament and of the Council of 29 April 2004 on the coordination of social security systems [2004]

Treaty Establishing the European Community [1957]

Treaty on European Union [1992]

Treaty on the Functioning of the European Union (2012)

References

Amnesty International, (2011), *Briefing: Human Rights on the Margins, Roma in Europe*, Amnesty International: London, available at: https://www.amnesty.org.uk/files/roma_in_europe_briefing.pdf (accessed 21/02/2020).

Amnesty International, (2015), *Roma in Europe: 11 things you always wanted to know but were afraid to ask*, Amnesty International: London, available at: <https://www.amnesty.org/en/latest/campaigns/2015/04/roma-in-europe-11-things-you-always-wanted-to-know-but-were-afraid-to-ask/> (accessed 08/10/21)

Anderson, B., (2010), 'Migration, immigration controls and the fashioning of precarious workers', *Work, employment and society* 24(2): 300-317

Anderson, B., Ruhs, M., Rogaly, B., and Spencer, S., (2006), 'Fair Enough? Central and East European migrants in low-wage employment in the UK', Research Report: Joseph Roundtree Foundation, available at: <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/1617-migrants-low-wage-employment.pdf> (accessed 23/11/20)

Anderson, B., and Ruhs, M., (2010), 'Migrant Workers: Who Needs Them? A Framework for the Analysis of Staff Shortages, Immigration and Public Policy' in Ruhs, M., and Anderson, B., *Who Needs Migrant Workers?: Labour shortages, immigration and public policy*, Oxford University Press: Oxford

Angelov, G., and Ivanova, I., (2011), *Bulgarian Labour Migration: Do restrictions make sense?*, Research Report, Open Society Institute: Sofia, available at: http://www.osf.bg/downloads/File/2011_New/Bg_trudova_migracia_ENG_kor.pdf (accessed 15/03/20).

Aradua, C., (2009), 'The Roma in Italy: Racism as Usual?' *Radical Philosophy*, 153: 2-6

Aradau, C., Huysman, J., Maciotti, P.G., and Squire, V., (2013), 'Mobility interrogating free movement: Roma Acts of European Citizenship' in Isin, E., and Saward, M., *Enacting European Citizenship*, Cambridge University Press: Cambridge, pp. 132-154

Association of Colleges (2014), *English for Speakers of Other Languages in England*, Policy Report, Association of Colleges, available at: https://www.aoc.co.uk/sites/default/files/Language%20and%20employability%20skills%20provision%20for%20JCP-mandated%20customers_0.pdf (accessed 20/02/21)

Balch, A., and Balabanova, E., (2016), 'Ethics, politics and migration: public debates on the free movement of Romanians and Bulgarians in the UK, 2006-2013', *Politics*, 36(1): 19-35

Baracsi, K., (2018) 'The Multi-level (Mis)Governance of Roma Migration in the City of Naples' in Lacroix, T., and Desille, A., (eds.), *International Migrations and Local Governance: A Global Perspective (Migration, Diasporas and Citizenship)*, Palgrave Macmillan: London, pp. 169-190

Bauere, V., Densham, P., Millar, J., and Salt, J., (2007), 'Migrants from central and eastern Europe: local geographies', *National Statistics Population Trends*, 129, pp. 7-19

Bazeley, P., and Jackson, K., (2013), *Qualitative Data Analysis with NVivo*, 2nd Edition, Sage: London

BBC, (2016), 'EU Referendum Results', The BBC (25th June 2016), available at: https://www.bbc.co.uk/news/politics/eu_referendum/results (accessed 08/10/21)

Beitin, B., K., (2014), 'Interview and Sampling: How Many and Whom' in Gubrium, J., Holstein, A., Marvasti, A., and McKinney, K., (eds.), *The SAGE Handbook of Interview Research: The Complexity of the Craft*, Sage: London

Bellamy, R., (2001), 'The 'Right to Have Rights': Citizenship Practice and the Political Constitution of the EU', in Bellamy, R., and Warleigh, A., (eds.), *Citizenship and Governance in the European Union*, Continuum: London and New York, pp. 41-72

Bellamy, R., (2008), 'Evaluating Union Citizenship: Belonging, Rights and Participating within the EU', *Citizenship Studies*, 12: 597-611

Bellamy, R., (2019), 'On Mushroom Reasoning and Kostakopoulou's Argument for Eurozenship' in Orgad, L., and Lepoute, J., (eds.), *Should EU Citizenship Be Disentangled from Member State*

Nationality, EHI Working Papers, Robert Schuman Centre for Advanced Studies in Global Citizenship Governance, available at https://cadmus.eui.eu/bitstream/handle/1814/62229/RSCAS%202019_24rev2.pdf (accessed 05/10/21)

Beland, D., and Lecours, A., (2007), 'Federalism, nationalism and social policy decentralisation in Canada and Belgium', *Regional and Federal Studies*, 17(4): 405-419

Beland, D., and Lecours, A., (2008), *Nationalism and Social Policy: The Politics of Territorial Solidarity*, Oxford University Press: Oxford

Benson, M., Sigona, N., Zambelli, E., and Craven, C., (2022), 'From the state of the art to new directions in researching what Brexit means for migration and migrants', *Migration Studies*, 10(2): 374-390

Bergene, A., (2007), 'Towards A Critical Realist Comparative Methodology: Context-Sensitive Theoretical Comparison', *Journal of Critical Realism*, 6(1): 5-27

Bertram, C., and Wright, S., (2012), 'Working Scotland', in Mooney, G., and Scott, G., (eds.), *Social justice and social policy in Scotland*, Bristol University Press

Blair, T. (2000), *Prime Minister's Speech to the Polish Stock Exchange in Warsaw*, October 6: 2000.

Blaikie, N., (2007), *Approaches to Social Enquiry*, 2nd Edition, Polity: Cambridge

Blaikie, N., (2010), *Designing Social Research*, 2nd Edition, Polity: Cambridge

Blauberger, M., Heindlmaier, A., Kramer, D., Martinsen, D.S., Theirry, J.S., Schenk, A., and Werner, B., (2018), 'ECJ Judges read the morning papers. Explaining the turnaround of European citizenship jurisprudence', *Journal of European Public Policy*, 25 (10): 1422-1441

Blauberger, M., and Schmidt, S., (2014), 'Welfare Migration? Free Movement of EU citizens and access to social benefits', *Research and Politics*, 1(3): 1-7

Bramley G., Morris M., Mort L., Netto G., Sosenko F., Webb, J., (2021), 'The scale, causes and impacts of homelessness among EEA citizens'. Crisis Report, Heriot-Watt University and IPPR.

Brown, P., Dwyer, P., and Scullion, L., (2013), *The Limits of Inclusion?: Exploring the views of Roma and non-Roma in six European Member States*, Research Report, Roma Source, available at: <https://huddersfield.app.box.com/s/lrslwdqlt6feslgcx1y0gymyg852kwsh> (last accessed 05/03/22)

Brown, P, Martin, P. and Scullion, L., (2013), *Migrant Roma in the United Kingdom: Population Size and the Experiences of Local Authorities and Partners*, Research Report, University of Salford, available at: <https://huddersfield.app.box.com/s/b3tv28x0e75yrkul7x9gdlank1jgk87a> (accessed 23/11/20)

Brown, P., Martin, P., and Scullion, L., (2014), 'Migrant Roma in the United Kingdom and the need to estimate population size', *People, Place and Policy*, 8(1): 19-33

Brown, P., Dwyer, P., Martin, P., Scullion, L., and Turley, H.C., (2015), *Rights, Responsibilities and Redress: Research for Policy and Practice for Roma Inclusion in 10 Member States*, Research Report, Roma-MATRIX, available at:

<https://usir.salford.ac.uk/id/eprint/35774/1/Roma%20Matrix%20final%20report.pdf> (last accessed 03/03/22)

Brown, P., Allen, D., Czureja, S., Dinu, L., Glowacki, S., Hesk, G., Ingmire, S., Martin, P., Orsos, O., Palmi, M., and Rostas, T., (2016), *Supporting Roma Voices*, University of Salford, available at:

<https://usir.salford.ac.uk/id/eprint/44112/1/SRV-Final-Report-Dec-2016.pdf> (accessed 23/11/21)

Brown, P., Shallice, A., and Brown, G., Ivatts, A., (2018), *Roma and Brexit: Report on the Joint All Party Parliamentary Group roundtable event*, available at:

<https://huddersfield.app.box.com/s/8p8n70bn6w72ao0ifh049hoc17hukck7> (accessed 23/11/21)

Brown, P., (2021) *Falling through the gaps: the EU Settlement Scheme and the case of Roma communities in the UK* Report on an All-Party Parliamentary Group event held on the 17 November 2020, available at

<https://www.romasupportgroup.org.uk/uploads/9/3/6/8/93687016/sm03 - euss report v9.pdf> (last accessed 03/02/22)

Bruzelius C, Chase, E., Hueser C. and Seleib-Kaiser, M., (2014) *The social construction of European citizenship and associated social rights*, Barnett papers in social research WP 14–01.

Bruzelius, C., Chase, E., and Seeleib-Kaiser, M., (2016) Social rights of EU migrant citizens: Britain and Germany compared, *Social Policy and Society*, 15(3): 403–416

Bruzelius, C., Jacqueson, C., and Seeleib-Kaiser, M., (2018), '(Dis)united in Adversity? Social policy and social rights in the EU', in Pennings F., and Seeleib-Kaiser, M., [eds.], *European Citizenship and Social Rights: Entitlements and Impediments to Accessing Welfare: Interdisciplinary Perspectives on EU Citizenship*, Edward Elgar: Cheltenham, pp. 173-198

Bryman, A., (2016), *Social Research Methods*, 5th Edition, Oxford University Press: Oxford

Buckner, L., and Yeandle, S., (2015), *The Value of Carers 2015: The rising value of carers' support*, Research Report: Carers UK, available at:

<https://www.carersuk.org/for-professionals/policy/policy-library/valuing-carers-2015> (last accessed 02/03/22)

Cameron, D., (2013), 'Free Movement within Europe needs to be less free,' *The Financial Times* (26th November 2013) available at <https://www.ft.com/content/add36222-56be-11e3-ab12-00144feabdc0> (last accessed 05/10/21)

Campbell, J., Thomson, E., and Ross, S., (2017), 'Recession and recovery in Scotland: the impact on women's labour market participation beyond the headline statistics', *Journal of Research in Gender Studies*, 7(1): 123-136

Carerra, S., (2014), 'The Framing of Roma as Abnormal EU Citizens in France: Assessing European Politics on Roma Evictions and Expulsions in France', in Guild, E., Gortazar Rotaeché, C. J., and Kostakopoulou, D., (eds.), *The Reconceptualization of European Union Citizenship*, Brill: The Netherlands, pp. 33-64

Child Poverty Action Group (2016), *European Nationals and Sickness Benefits*, Child Poverty Action Group: London, available at: <https://askcpag.org.uk/content/200112/european-nationals-and-sickness-benefits> (last accessed 23/05/22)

Child Poverty Action Group (2020), *Welfare Benefits and Tax Credits Handbook*, 22nd Edition, Child Poverty Action Group: London

Cities for Local Integration Policy, (2008), *Equality and diversity in jobs and services for migrants in European cities: Good practice guide*, European Foundation for the Improvement of Living and Working Conditions

Clark, C., and Campbell, (2000), 'Gypsy Invasion': A critical analysis of newspapers' reaction to Czech and Slovak Romani asylum seekers in Britain, 1997, *Romani Studies*, 10(1): 23-47

Clark, C., (2014a) 'Glasgow's Ellis Island? The integration and stigmatisation of Govanhill's Roma population', *People, Place and Policy*, 8(1): 34-50

Clark, C., (2017) "'For work, we came here to find work": migrant Roma employment and the labour of language' in Beresford, P., and Carr, S., (eds.), *Social Policy First Hand: An international introduction to participatory welfare*, Policy Press, pp. 107-117

Clark, C., (2020), 'Stay or go – Roma, Brexit and European freedom of movement', *Scottish Affairs*, 29(3): 403-418

Clark, K., Drinkwater, S., and Robinson, C., (2014) *Migration, Economic Crisis and Adjustment in the UK*, Institute for the Study of Labour, available at: <http://ftp.iza.org/dp8410.pdf> (accessed 11/06/21)

Clark, T., (2014b), 'Unwilling freelancers give the lie to unemployment statistics', *The Guardian* (28th October 2014), available at: <https://www.theguardian.com/society/2014/oct/28/unwilling-freelancers-lie-unemployment-statistics> (last accessed 10/08/22)

Clarke, S, Cominetti, N (2019) *Setting the Record Straight: How Record Employment has Changed the UK*, Resolution Foundation: London, available at: <https://www.resolutionfoundation.org/app/uploads/2019/01/Setting-the-record-straight-full-employment-report.pdf> (last accessed 06/03/22)

Clasen, J. and Clegg, D. (2007) 'Levels and levers of conditionality: Measuring change within welfare states', in J. Clasen and N.A. Seigel (eds) *Investigating welfare state Change: The 'Dependent Variable Problem' in comparative analysis*, Cheltenham: Edward Elgar, pp 166–197

- Clasen, J., and Clegg, D., (2011), *Regulating the Risk of Unemployment: National Adaptations to Post-Industrial Labour Markets in Europe*, Oxford University Press: Oxford
- Clegg, D., (2010), 'Labour market policy in the crisis: the UK in comparative perspective', *Journal of Poverty and Social Justice*, 18(1): 5-17
- Coleman, J.S., (1958), 'Relational Analysis: The Study of Social Organisation with Survey Methods', *Human Organisation*, 16: 28-36
- Communities and Local Government, (2011), *A Plain English Guide to the Localism Act*, Department of Communities and Local Government: London, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/5959/1896534.pdf (last accessed 05/05/22)
- Community Infosource, (2016), *The Roma Community in Scotland 2016*, Research Report, Scottish Churches Racial Justice Group, available at: <https://www.renfrewshire2023.com/wp-content/uploads/2016/06/The-Roma-Community-in-Scotand-2016.pdf> (accessed 23/04/2021)
- Cook, J., Dwyer, P., and Waite, L., (2011), 'The Experiences of Accession 8 Migrants in England: Motivations, Work and Agency', *International Migration*, 49(2): 54-79
- Council of Europe, (2012), *Human Rights of Roma and Travellers in Europe*, Council of Europe Publishing: Strasbourg, available at: <https://rm.coe.int/the-human-rights-of-roma-and-travellers-in-europe/168079b434> (last accessed 11/08/22)
- Coulter, S., (2016), 'The UK labour market and the 'great recession'', in Myant, M., Theodoropoulou, S., and Piasna, A., (eds.), *Unemployment, Internal Devaluation and Labour Market Deregulation in Europe*, European Trade Union Institute: Brussels, pp. 197-227
- Craig, G., (2011), *United Kingdom: Promoting Social Inclusion of Roma - A Study of National Policies*, Research Report: European Commission DG Employment, Social Affairs and Inclusion, available at: <https://www.york.ac.uk/inst/spru/research/pdf/Roma2011.pdf> (accessed 23/11/20)
- Dagilyte, E., and Greenfields, M., (2015), 'United Kingdom welfare benefit reforms in 2013-2014: Roma between the pillory, the precipice and the slippery slope', *Journal of Social Welfare and Family Law*, 17(4): 476-495
- D'Angelo, A., and Kofman, E., (2018), 'From Mobile Workers to Fellow Citizens and Back Again? The Future Status of EU Citizens in the UK', *Social Policy and Society*, 17(2): 331-343
- Deacon, A., (2004), 'Justifying conditionality: the case of anti-social tenants', *Housing Studies*, 19:6: 911-928
- Delanty, G., (2007), 'European Citizenship: A Critical Assessment', *Citizenship Studies*, 11(1): 63-72

de Lima, P., and Wright, S., (2009), 'Welcoming Migrants? Migrant Labour in Rural Scotland', *Social Policy and Society*, 8(3): 391-404

Director of Labour Market Enforcement, (2020), *Worker Voices in the Hand Car Wash Sector*, *The Office for the Director of Labour Market Enforcement*: London, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040232/worker-voices-in-hand-car-washes.pdf (last accessed 14/08/22)

Dinu, L., and Scullion, L., (2019), 'Exploring the impact of welfare conditionality on Roma migrants in the UK', in Dwyer, P., (ed), *Dealing with Welfare Conditionality: Implementation and effects*, Bristol University Press: Bristol, pp. 119-147

Dustmann, C., Casanova, M., Fertig, M., Preston, I. and Schmidt, C., (2003) *The Impact of EU Enlargement on Migration Flows*, Research Report, Home Office: London, 25/3.

DWP (2012), *Explanatory Memorandum for the Social Security Advisory Committee: Universal Credit Regulations 2012*, Department of Work and Pensions, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221579/uc-draft-regs-2012-memorandum.pdf (last accessed 13/06/2020)

DWP (2013), *Tough new migrant benefit rules will come into force tomorrow*, Press Release 31st December, 2013, Department of Work and Pensions, available at: <https://www.gov.uk/government/news/tough-new-migrant-benefit-rules-come-into-force-tomorrow> (last accessed 13/08/2019)

DWP (2014a), 'New Rules to Stop Migrants Claiming Housing Benefit', Press Release 20th January 2014, Department of Work and Pensions, available at: <https://www.gov.uk/government/news/new-rules-to-stop-migrants-claiming-housing-benefit> (last accessed 02/07/2020)

DWP (2014b), *Decision Maker Guidance, Part 3: Habitual Residence & the Right to Reside*, IS/JSA/SPC/ESA, Department of Work and Pensions, available at: https://www.rightsnet.org.uk/pdfs/DMG_Memo_1_14.pdf (last accessed 13/06/2020)

DWP (2014c), *Habitual Residence and Right to Reside – JSA*, Memo DGM 15/14, Department of Work and Pensions, available at: https://webarchive.nationalarchives.gov.uk/20140730104053/https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/324534/m-15-14.pdf (13/08/2019)

DWP (2016), *Decision Marker Guidance, Chapter 42: Limited Capability for Work and Limited Capability for Work-Related Activity*, Department of Work and Pensions, available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/794983/dmgch42.pdf (last accessed 13/04/2021)

DWP (2020), *EU Social Security Coordination Impact Assessment*, Department of Work and Pensions, available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/965871/EU_Social_Security_Coordination_Updated_Impact_Assessment.pdf (accessed 10/08/22)

Dwyer, P., (2004), 'Creeping Conditionality in the UK: From welfare rights to conditional entitlements', *Canadian Journal of Sociology*, 29(2): 265-287

Dwyer, P., (2010), *Understanding Social Citizenship: Themes and perspectives for policy and practice*, Policy Press: Bristol

Dwyer, P., Jones, K., Scullion, L., and Stewart, A., (2016), *First Wave Findings: Migrants and Conditionality*, Welfare Conditionality: Sanctions, Support and Behaviour Change, University of York, available at:

<http://www.welfareconditionality.ac.uk/wp-content/uploads/2016/05/WelCond-findings-migrants-May16.pdf> (last accessed 13/04/2021)

Dwyer, P., (2018), *Final Findings Report: Welfare Conditionality Project 2013-2018*, Welfare Conditionality: Sanctions, Support and Behaviour Change, University of York, available at: http://www.welfareconditionality.ac.uk/wp-content/uploads/2018/06/40475_Welfare-Conditionality_Report_complete-v3.pdf (last accessed 15/05/2021).

Dwyer, P., Scullion, L., Jones, K., and Stewart, A., (2019), 'The impact of conditionality on the welfare rights of EU migrants in the UK', *Policy and Politics* 47(1): 133-150

Dwyer, P., and Wright, S., (2014), 'Universal Credit, ubiquitous conditionality and its implications for social citizenship', *Journal of Poverty and Social Justice*, 22(1): 27-35

Easton, G., (2010), 'Critical realism in case study research', *Industrial Marketing Management*, 39: 118-128

Eby, D., (2022), 'The Role of Antiziganism in Brexit', *The Journal for Social Thought*, 6(1): 1-14

Eminson, R., (2021), 'Caught in the Cross-fire: LGBT+ Traveller Intersectionality in Post-Brexit Britain', *Journal of Roma Studies*, 3(3): 288-231

Esping-Andersen, G., (1990), *The Three Worlds of Welfare Capitalism*, Princeton University Press: Princeton

Eurocities, (2013), *Employability of Roma*, Peer Review Report, Eurocities, available at: https://nws.eurocities.eu/MediaShell/media/Report_RomaEmployability_PR_Glasgow_FINAL.pdf (accessed 23/05/21)

European Commission, (2004), *The Situation of Roma in an Enlarged European Union: Fundamental Rights and Discrimination*, Employment and Social Affairs: United Kingdom

European Commission, (2005), *Working Together, Working Better: A New Framework for the Open Coordination of Social Protection and Inclusion Policies in the European Union*. European Commission: Brussels

European Commission, (2011), *An EU Framework for National Roma Integration Strategies*, European Commission: Brussels, available at: http://ec.europa.eu/justice/policies/discrimination/docs/com_2011_173_en.pdf (accessed 30/08/16)

European Commission, (2014), *Report on the implementation for National Roma Integration Strategies*, European Commission: Brussels, available at: http://ec.europa.eu/justice/discrimination/files/roma_implement_strategies2014_en.pdf (accessed 18/08/16).

European Commission, (2014), *Report on the health status of the Roma population in the EU and monitoring data collection in the area of Roma health in the Member States*, Research Report, European Commission, available at: https://ec.europa.eu/health/sites/health/files/social_determinants/docs/2014_roma_health_report_en.pdf (accessed 23/11/20)

European Agency for Fundamental Rights, (2014), *Poverty and Employment: The Situation of Roma in 11 EU Member States*, Research Report, European Agency for Fundamental Rights: Austria, available at: <https://fra.europa.eu/en/publication/2014/poverty-and-employment-situation-roma-11-eu-member-states> (20/03/20)

Faist, T., (2001), 'Social Citizenship in the European Union: Nested Citizenship', *Journal of Common Market Studies*, 39(1): 37-58

Favell, A., (2008a), *Eurostars and Eurocities: Free Movement and Mobility in an Integrating Europe*, Blackwell: Oxford

Favell, A., (2008b), 'The new face of East-West migration in Europe', *Journal of Ethnic and Migration Studies*, 34: 701-716

Fletcher, D., R., (2016), *First Wave Findings: Offenders, Welfare Conditionality: Sanctions, Support and Behaviour Change*, University of York, available at: <http://www.welfareconditionality.ac.uk/wp-content/uploads/2016/05/WelCond-findings-offenders-May16.pdf> (last accessed 13/06/2020)

Fox, J.E., Morosanu, L., and Szilassy, E., (2012), 'The Racialization of the New European Migration to the UK', *Sociology*, 46(4): 680-695

FRA, (2015), *Local Engagement for Roma Inclusion: Community Summary Glasgow, United Kingdom, Research Report*: European Agency for Fundamental Rights, available at: https://fra.europa.eu/sites/default/files/fra_uploads/fra-2015-leri-community-summary-uk-glasgow_en.pdf (accessed 23/04/2020)

Fremlova, L., Ureche, H., and Oakely, R., (2009), *The movement of Roma from new European member states: A mapping survey of A8 and A2 Roma in England. Patterns of settlement and the current situation of new Roma communities in England*. Equality: London

Fundación Secretariado Gitano (2009), *Health and the Roma Community, analysis of the situation in Europe*, Research Report: Fundación Secretariado Gitano, Spain, available at: https://www.gitanos.org/upload/78/83/Health_and_the_Roma_Community.pdf (accessed 21/11/20)

Geddes, A., and Scott, S., (2010), 'UK Food Businesses' Reliance on Low Waged Migrant Labour: A Case of Choice or Constraint?', in Ruhs, M., and Anderson, B., (eds.), *Who Needs Migrant Workers?: Labour shortages, immigration and public policy*, Oxford University Press: Oxford, pp. 193-224

Gill, R., (2000), 'Discourse Analysis' in Bauer, M., and Gaskell, G., (eds.), *Qualitative Researching with Text, Image and Sound*, Sage: London

Glasgow Roma-NeT, (2013), *Local Action Plan 2012-13*, Glasgow City Council: Glasgow, available at: <https://urbact.eu/files/roma-net-glasgow-local-action-plan> (accessed 23/04/2020)

Godin, M., and Signona, N., (2019), EU families feel more welcome in Scotland than they do in the rest of the UK, British Policy and Politics at LSE [blog] available at: <http://eprints.lse.ac.uk/103580/> (accessed 14/11/22)

Godin, M., and Sigona, N., (2022), 'Intergenerational narratives of citizenship among EU citizens in the UK after the Brexit referendum', *Ethnic and Racial Studies*, 45(6): 1135-1154

Goodwin, M., and Burjiss, R., (2013), 'Making Good European Citizens of Roma: A Closer Look at the EU Framework for National Roma Integration Strategies', *German Law Journal*, 14(10): 2041-2056

Greater London Authority, (2012), *Analysis of English Language Employment Support Provision in London for JSA and ESA WRAG customers*, Research Report: Mayor of London, available at: <https://dera.ioe.ac.uk/15853/1/Analysis%20of%20English%20Language%20Employment%20Support%20Provision.pdf> (20/02/21)

Greg, P., and Wadsworth, J., (2010), *The UK labour market and the 2008-2009 recession*, Centre for Economic Performance occasion papers 25, Centre for Economic Performance, London School of Economics and Political Science: London.

Greenfields, M., and Dagilyte, E., (2018), 'I Would Never Have Come If We'd Known It Might Be Like This: On the [Un]Intended Consequences of Welfare Governance of EU Roma Migrants in Britain', *Intersections*, 4(3): 81-105

Grill, J., (2012), 'It's building up to something and it won't be nice when it erupts': The making of Roma/Gypsy migrants in post-industrial Scotland', *Focaal-Journal of Global and Historical Anthropology*, 62: 42-54

Grimshaw, D., and Raftery, A., (2011), 'Social Impacts of the Crisis in the United Kingdom: Focus on Gender and Age Inequalities' in Vaughan-Whitehead, D., (ed), *Work Inequalities in the Crisis: Evidence from Europe*, International Labour Organisation: Cheltenham, pp. 525 – 570

Guy, W., (2001), 'Romani Identity and post-communist policy' in Guy, W., (ed.) *Between Past and Future: The Roma of Central and Eastern Europe*, University of Hertfordshire Press: Hatfield, pp. 3-32

Guy, W., (2003), 'No Soft Touch: Romani Migration to the U.K. at the Turn of the Twenty-first Century', *Nationalities Papers*, 31(1): 63-79

Guy, W., (2009), 'EU Initiatives on Roma: Limitations and Ways Forward' in Sigona, N., and Trehan, N., (eds.), *Romani Politics in Contemporary Europe: Poverty, Ethnic Mobilization and the Neo-Liberal Order*, Palgrave Macmillan: London, pp. 23-50

Haider, S., (2020), *The Historical and Ongoing Persecution of Europe's Gypsies*, The Open University, available at:

<https://www.open.edu/openlearn/history-the-arts/history/the-historical-and-ongoing-persecution-europes-gypsies> (accessed 08/10/21)

Hatfield, I., (2015), *Self-employment in Europe*, Research Report: Institute For Policy Research, available at: https://www.ippr.org/files/publications/pdf/self-employment-Europe_Jan2015.pdf (accessed 10/01/21)

Helms, G., and Cumbers, A., (2006), 'Regulating the new urban poor: Local labour market control in an old industrial city', *Space and Polity*, 10(1): 67-86

Hepburn, E., and Rosie, M., (2014), 'Immigration, Nationalism and Political Parties in Scotland' in Hepburn, E., and Zapata-Barrero, (eds.), *The Politics of Immigration in Multilevel States: Governance and Political Parties*, Palgrave Macmillan: Basingstoke, 241-260

Hepburn (2014), *Scotland's 'hidden' policy competence: immigrant integration and policy divergence in Scotland since devolution*, Paper presented at the Policy & Politics annual conference, University of Bristol, 16-17 September 2014

Hepworth, K., (2015), *At the Edges of Citizenship: Security and the Constitution of Non-citizen subjects*, Routledge: New York

Holter, G., (2011), Vion to close Sheffield sausage plant, *Food Manufacture* (24th July 2011), available at <https://www.foodmanufacture.co.uk/Article/2011/07/25/Vion-to-close-Sheffield-sausage-plant> (accessed 07/07/22)

Home Office, (2020), *Policy Equality Statement: EU, other European Economic Area and Swiss citizens resident in the UK and their family members*, Home Office, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936478/EUSS_PES_November_2020.pdf (accessed 11/06/21)

Humphris, R., (2017), 'Borders of Home: Roma migrant mothers negotiating boundaries in home encounters', *Journal of Ethnic and Migration Studies*, 43(7): 1190-1204

Humphris, R., (2019) *Homeland: Romanian Roma, Domestic Spaces and the State*, Bristol University Press: Bristol

Isin, E., and Saward, M., (eds.), (2013), *Enacting European Citizenship*, Cambridge University Press: Cambridge

Jentsch, B., (1998), 'The 'interpreter effect': rendering interpreters visible in cross-cultural research methodology', *Journal of European Social Policy*, 8(4): 275-289

Joseph Rowntree Foundation, (2015), *The Cost of Cuts: The Impact on Local Government and Poorer Communities*, the Joseph Rowntree Foundation: London, available at: <https://www.jrf.org.uk/report/cost-cuts-impact-local-government-and-poorer-communities> (accessed 05/02/22)

Kóczé, A., (2018), 'Race, migration and neoliberalism: distorted notions of Romani migration in European discourses', *Social Identities*, 24(4): 459-473

Kostakopoulou, D., (2005) 'Ideas, Norms and European Citizenship: Explaining Institutional Change', *The Modern Law Review*, 68 (2): 233–267.

Kostka, J., (2022), *Social care: how Gypsy, Roma and Traveller children face discrimination across Europe and the UK*, Blog, The Conversation, available at: <https://theconversation.com/social-care-how-gypsy-roma-and-traveller-children-face-discrimination-across-europe-and-the-uk-170312> (accessed 11/08/22)

Kovats, M., (2001), 'Problems of Intellectual and Political Accountability in Respect of Emerging European Roma Policy', *Journal of Ethnopolitics and Minority Issues in Europe*, 2001: 1 -10

Layder, D., (1998), *Sociological Practice: Linking Theory and Social Research*, Sage: London

Leggio, D. V., (2017), 'Critiquing stereotypes: Research engagement with local authority interventions in support of Roma migrants.' *ANUAC*, 6(1): 119-140

Leggio, D. V., (2019) 'Modern Day Fagins', 'Gaudy Mansions' and the 'Increasing Numbers': Narratives of Roma Migrants in the Build Up to the British EU referendum' in Magazzini, T., and Piemontese, S., (eds.) *Constructing European Migrants: European Narratives and Local Governance*, IMISCOE Research Series, Springer: Cham, pp. 69-87

Lewis, J., Ritchie, J., Ormston, R., and Morrell, G., (2014), 'Generalising from Qualitative Research' in Ritchie, J., Lewis, J., McNaughton Nicholls, C., and Ormston, R., (eds.) *Qualitative Research Practice: A Guide for Social Science Students and Researchers*, 2nd Edition, Sage: London, pp. 347-366

Lewis, H., and Craig, G., (2014), 'Multiculturalism is never talked about': community cohesion and local policy contradictions in England', *Policy and Politics*, 42(1): 21-38

Lipsky, M., (2010), *Street Level Bureaucracy: Dilemmas of the Individual in Public Services*, Russell Sage Foundation: New York

Maas, W., (2007), *Creating European Citizens*, Rowman and Littlefield Publishers: Plymouth UK

- Maas, W., (2008), 'Migrants, States and EU Citizenship's Unfilled Promise', *Citizenship Studies*, 12(6): 583-596
- Maas, W., (2013a), 'Free Movement and Discrimination: Evidence from Europe, the United States and Canada', *European Journal of Migration and Law*, 15(1): 91-110
- Maas, W., (2013b), (ed.), *Multilevel Citizenship*, University of Pennsylvania Press: Philadelphia Pennsylvania
- Mackenzie, R., and Forde, C., (2009), 'The Rhetoric of the 'Good Worker' versus the Realities of Employers' Use and the Experiences of Migrant Workers', *Work, Employment and Society*, 23(1): 3-26
- Marsh, D., (2010), 'Meta-Theoretical Issues' in Marsh, D., and Stoker, G., (eds.), *Theory and Methods in Political Science*, 3rd Edition, Palgrave Macmillan: Basingstoke pp. 212-231
- Marshall, T. H., (1992), *Citizenship and Social Class*, Pluto Press: London
- Martin., P.B., (2021), "'So this is not a game" - Brexit as a 'situation of uncommon precarity for migrants of Roma heritage in the UK', *International Journal of Roma Studies*, 3(1): 46-72
- Martin, P., Scullion, L., and Brown, P., (2017), 'We Don't Rely on Benefits': Challenging Mainstream Narratives Towards Roma Migrants in the UK, *Social Policy Review 29: Analysis and Debate in Social Policy*, Policy Press/Social Policy Association: Bristol
- Martin, P., Scullion, L., Brown, P., (2018), 'Roma Persons and EU Citizenship' in Pennings F., and Seeleib-Kaiser, M., (eds.), *European Citizenship and Social Rights: Entitlements and Impediments to Accessing Welfare: Interdisciplinary Perspectives on EU Citizenship*, Edward Elgar: Cheltenham, pp. 173-198
- Marusak, M., and Singer, L., (2009), 'Social Unrest in Slovakia 2004: Romani reaction to neoliberal "reforms", in Sigona, N., and Trehan, N., (eds.) *Romani Politics in Contemporary Europe: Poverty, Ethnic Mobilization, and the Neoliberal Order*, Palgrave Macmillan: Basingstoke, 186-208
- Massey, D.S., (1990) 'Social Structure, Household Strategies, and the Cumulative Causation of Migration', *Population Index*, 56(1): 3-26
- Mason, J., (2018), *Qualitative Researching*, 3rd Edition, Sage: London
- Magazzini, T., Chiozza, E., and Rossi, M., (2019), 'Conformism or Inadequacy of Roma Inclusion Policies? Missed Opportunities at the European and Local Levels' in Magazzini, T., and Piemontese, S., (eds.) *Constructing European Migrants: European Narratives and Local Governance*, IMISCOE Research Series, Springer: Cham, pp. 51 - 68
- Menendez, A. J., (2010), 'European Citizenship after Martinez Sala and Baumbast: Has European Law Become More Human but Less Social?', in Maduro, M. P., and Azoulay, L., (eds.), *The Past and Future of EU Law: The Classics of EU Law Revisited on the 50th Anniversary of the Rome Treaty*, Hart Publishing: Portland US

Migration Observatory, (2020), *EU Migration to and from the UK*, Policy Briefing: Migration Observatory, University of Oxford, available at: <https://migrationobservatory.ox.ac.uk/resources/briefings/eu-migration-to-and-from-the-uk/> (accessed 01/10/21)

Migration Yorkshire, (2018a), *Roma in Sheffield: Mapping services and local priorities*, Research Report: South Yorkshire Roma Project, Migration Yorkshire, available at: <https://www.migrationyorkshire.org.uk/userfiles/file/projects/roma-syorks/syr-7-roma-in-sheffield-2017.pdf> (accessed 23/04/2020)

Migration Yorkshire, (2018b), *Roma in South Yorkshire: Mapping services and local priorities*, Research Report: South Yorkshire Roma Project, Migration Yorkshire, available at: <https://www.migrationyorkshire.org.uk/userfiles/file/projects/roma-syorks/syr-3-roma-in-sy-mapping-2017.pdf> (accessed 23/04/2020)

Migration Yorkshire, (2020), *Roma Matrix*, Migration Yorkshire: Leeds, available at: <https://www.migrationyorkshire.org.uk/romamatrix> (accessed 05/02/22)

Minkler, M. (2004, 'Ethical challenges for the 'outside' researcher in community-based participatory research', *Health, Education & Behaviour*, 31(6): 684–697

Morris, (2016), *Roma Communities and Brexit: Integrating and Empowering Roma in the UK*, Research Report: Institute for Public Policy Research, available at: <https://www.ippr.org/publications/roma-communities-and-brexit> (accessed 23/04/2022)

Mullen, A., (2018), 'Race', Place and Territorial Stigmatisation: The Construction of Roma Migrants in and through Govanhill, Scotland' in Devine, T., and McCarthy, A., (eds.), *New Scots: Scotland's Immigrant Communities since 1945*, Edinburgh University Press: Edinburgh, pp. 205-231

Mulvey, G., (2018), 'Social Citizenship, Social Policy and Refugee Integration: a Case of Policy Divergence in Scotland?', *Journal of Social Policy*, 47(1): 161-178

Nagy, V., (2016a), *The power of invisibility: Reconstructing mobility: Roma in an expanding Europe*, PhD thesis, Utrecht University: Utrecht, Netherlands

Nagy, V., (2016b), The Welfare Ban-opticon: Financial Sorting of Low-Income Migrants from Central and Eastern Europe', *Review of Sociology* 26(4): 74–94.

Nagy, V., (2018), 'The Janus face of precarity – Securitisation of Roma mobility in the UK', *Local Economy* 33(2): 127-146

Nagy, V., (2019) 'Identity Game for Welfare: Circumventing Surveillance of Legal Migrants in Europe', in Magazzini, T., and Piemontese, S., (eds.) *Constructing European Migrants: European Narratives and Local Governance*, IMISCOE Research Series, Springer: Cham, pp. 175-194

O'Brien, C., (2013), 'From Safety Nets and Carrots to Trampolines and Sticks: National Use of the EU as both Model and Menace to Help Neoliberalize Welfare Policy' in Schiek, D., (ed.), *The EU Economic and Social Model in the Global Crisis: Interdisciplinary Perspectives*, Ashgate: Surrey

O'Brien, C., (2015), 'The Pillory, the Precipice and the Slippery Slope: The Profound Effects of the UK's Legal Reform programme targeting EU Migrants', *Journal of Social Welfare and Family Law*, 37(1): 111-136

O'Brien, C., (2017), *Unity in Adversity: EU Citizenship, Social Justice and the Cautionary Tale of the UK*, Hart Publishing: Oxford

O'Brien, C., (2021a), 'Between the Devil and the Deep Blue Sea: Vulnerable EU Citizens Cast Adrift in the UK', *Common Market Law Review*, 58(2): 431-470

O'Brien, C., (2021b), *Memo: Pre-settled Status and benefits: C-709/20 CG v the Department for Communities in Northern Ireland*, EU Rights and Brexit Hub, available at: <https://www.eurighthub.york.ac.uk/blog/itzfizid6d8awrwaco1w6aggx1pfdi> (accessed 08/10/21)

O'Brien, C., and Welsh, A., (2021), *The Status of EU Nationals: Emergency Measures Needed*, EU Rights and Brexit Hub, available at: https://static1.squarespace.com/static/5f3aa00c8a9f0607ba8b4e98/t/60af763246073519d7dc1e9b/1622111794969/EURBH_emergencymeasuresneeded_May21.pdf (accessed 11/06/2021)

O'Nions, H., (2011), 'Roma Expulsions and Discrimination: The Elephant in Brussels', *European Journal of Migration and Law*, 13(4): 361-388

O'Nions, H., (2015), 'How Citizenship Laws Leave the Roma in Europe's Hinderland', in Howard-Hassmann, R., and Walton-Roberts, M., *The Human Right to Citizenship: A Slippery Concept*, University of Pennsylvania Press: Pennsylvania, pp. 145-161

O'Nions, H., (2016), *Minority Rights in International Law: the Roma of Europe*, Ashgate: Aldershot

O'Nions, H., (2020), 'No place called home. The banishment of 'foreign criminals' in the public interest: a wrong without redress', *Laws* 9(4): 26

Painter, J., (2008), 'European Citizenship and the Regions', *European Urban and Regional Studies*, 15(1): 5-19

Parker, O., (2012), 'Roma and the Politics of EU Citizenship in France: Everyday Security and Resistance', *Journal of Common Market Studies*, 50(3): 475-491

Parker, O., and López Catalán, O., (2014), 'Free Movement for Whom, Where, When? Roma EU Citizens in France and Spain', *International Political Sociology*, 8: 379-395

Parker, O., (2017), 'Critical political economy, free movement and Brexit: Beyond the progressives' dilemma', *The British Journal of Politics and International Relations*, 19(3): 479-496

Parker, O., (forthcoming), 'The Politics of Free Movement of People in the United Kingdom: Beyond Securitization and De-Securitization?', *Journal of Common Market Studies* (accepted 28/07/22)

Patel, T., Martin, P.B., Brown, P., and Tyler, P., (2022), 'Racialisation, the EU Referendum result and sentiments of belonging in the UK: a consideration of Roma populations', *Journal of Contemporary European Studies*: 1-14

Paterson, L., Simpson, L., Barrie, L., and Perinova, J., (2011), 'Unequal and Unlawful Treatment: Barriers faced by the Roma Community in Govanhill when accessing welfare benefits and the implications of section 149 of the Equality Act 2010', *Govanhill Law Centre Report*, available at: <https://cpag.org.uk/sites/default/files/Oxfam%20Law%20into%20Practice%20Project%20and%20Govanhill%20Law%20Centre%20Report%20Unequal%20and%20Unlawful%20Treatment.pdf> (accessed 05/05/2021)

Patrick, R., (2017), *For Whose Benefit? The Everyday Reality of Welfare Reform*, Policy Press: Bristol

Patrick, R., and Simpson, M., (2020), 'Conceptualising Dignity in the context of social security: Bottom up and top down perspectives', *Social Policy Administration*, pp.1-16

Pietka-Nykaza, E., Leith, M.S., Clark, C., (2020) 'Scotland and Brexit: Citizenship, Identity and Belonging', *Scottish Affairs* (29(3): 293-304

Piore, M.J., (1979), *Birds of Passage: Migrant Labour and Industrial Societies*, Cambridge University Press: Cambridge

Pollard, N., Latorre, M., and Sriskandarajah, D., (2008), *Floodgates or turnstiles?: Post-EU enlargement migration flows to (and from) the UK*, Institute For Policy Research: London, available at: http://www.ippr.org/files/images/media/files/publication/2011/05/floodgates_or_turnstiles_1637.pdf?noredirect=1 (accessed 19/11/19)

Poole, L., and Adamson, K., (2008), *Report on the situation of the Roma community in Govanhill*, Research Report, Oxfam: Glasgow, available at: <http://policy-practice.oxfam.org.uk/publications/situation-of-the-roma-community-in-govanhill-glasgow-112456> (accessed 10/08/20)

Poole, L., (2010) 'National Action Plans for Social Inclusion and A2 migrants: The case of the Roma in Scotland', *Critical Social Policy*, 30(2): 245-266

Richardson, J., (2014), 'Roma in the News: an examination of media and political discourse and what needs to change', *People, Place and Policy*, 8(1): 51-64

Richardson, J., and Codona, J., (2018), 'Blame and fear: Roma in the UK in a changing Europe', *Journal of Poverty and Social Justice*, 26(1): 95-112

Ritchie, J., Lewis, J., McNaughton Nicholls, C., and Ormston, R., (2014) *Qualitative Research Practice: A Guide for Social Science Students and Researchers*, 2nd Edition, Sage: London

Rodgers, G., and Rodgers, J., (1989) *Precarious Jobs in Labour Market Regulations: The Growth of Atypical Employment in Western Europe*, International Labour Organisation: Brussels

Rolfe, H., Fic, T., Lalani, M., Roman, M., Prohaska, M., and Doudevapage, L. (2013), *Potential impacts on the UK of future migration from Bulgaria and Romania*, Research Report, National Institute of Economic and Social Research Report, available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/182030/NIESR_EU2_MIGRATION_REPORT_-_FINAL_VERSION_26_MAR.pdf (accessed 21/02/21)

Rolfe, H. and Metcalf, H (2009), *Recent Migration into Scotland: The Evidence Base*, Research Report, Scottish Government Social Research

Romano Lav, (2019), *Unlawful Deportation of Romanian and Immigration Enforcement*, Briefing Paper for elected members, Submission to the Scottish Government Equal Opportunities Committee, Romano Lav, available at:

https://archive2021.parliament.scot/S5_Equal_Opps/Submission_from_Friends_of_Romano_Lav.pdf (accessed 11/06/21)

Roma Support Group, (2020), *Statement on the impact of EU Settlement Scheme digital-only status on the Roma Community in the UK*, Roma Support Group: London, available at:

https://www.romasupportgroup.org.uk/uploads/9/3/6/8/93687016/statement_on_the_impact_of_the_eu_settlement_scheme_digital_only_status_on_roma_communities_in_the_uk_final_oct_2020.pdf (accessed 10/06/21)

Ruberty, J., and Rafferty, A., (2012), 'Gender, Recession and Austerity in the UK', in Karamessini, M., and Ruberty, J., (eds.), *Women and Austerity: The economic crisis and the future of gender equality*, Routledge: London, pp. 123-143

Ruhs, M., and Anderson, B., (2010), 'Semi-Compliance and Illegality in Migrant Labour Markets: An Analysis of Migrants, Employers and the State in the UK', *Populations, Space and Place*, 16: 195-211

Ruhs, M. and Martin, P., (2008), 'Numbers vs. Rights: Trade-Offs and Guest Worker Programs', *International Migration Review*, 42(1): 249-265

Ruhs, M., (2017), 'Free Movement in the European Union: National Institutions vs Common Policies?', *International Migration*, 55: 22-38

Runnymede Trust, (2016), *Shadow Report: Submission to the UN Committee on the Elimination of Racial Discrimination with Regard to the UK Government's 21st to 23rd Periodic Reports*, Shadow Report: Runnymede Trust, available at:

<https://www.ukren.org/uploads/images/CERD%20Civil%20Society%20Report%20UKfinal.pdf> (accessed 23/04/2020)

Rutter, J., (2015), *Moving up and getting on: Migration, Integration and Social Cohesion in the UK*, Policy Press: Bristol

Ryan, L., Kofman, E., and Aaron, P., (2011), 'Insiders and outsiders: working with peer researchers in researching Muslim communities', *International Journal of Social Research Methodology*, 11(1): 49-60

Sauter, W., (2013) 'Proportionality in EU law: A balancing Act?', *Cambridge Yearbook of European Legal Studies*, 15: 439-466

Schimmelfennig, F. and U. Sedelmeier (2004). "Governance by conditionality: EU rule transfer to the candidate countries of Central and Eastern Europe." *Journal of European public policy* 11(4): 661-679.

Scott, G., (2006), 'Active labour market policy and the reduction of poverty in the 'new' Scotland', *Critical Social Policy*, 26(3): 669-684

Scott, G., and Mooney, G., (2009) 'Poverty and Social Justice in the Devolved Scotland: Neoliberalism Meets Social Democracy?' *Social Policy and Society*, 8(3): 379-389

Scott, G., and Wright, S., (2012), 'Devolution, social democratic visions and policy in reality in Scotland', *Critical Social Policy*, 32(3): 440-453

Scott, S., and Brindley, P., (2012), 'New geographies of migrant settlement in the UK', *Geography*, 97(1): 29-38

Scott, S., Craig, G., and Geddes, A., (2012) *Experiences of Forced Labour in the UK Food Industry*, Research Report, Joseph Roundtree Foundation: London, available at: <https://www.jrf.org.uk/sites/default/files/jrf/migrated/files/forced-labour-food-industry-full.pdf> (accessed 20/01/21)

Scott, S., (2013), 'Migrant-Local Hiring Queues in the UK Food Industry', *Population, Space and Place*, 19: 459-471

Scott, S., McCormack, A., and Zaloznik, M., (2008), *Staff Shortages and Immigration in Agriculture*, Research Report, Migration Advisory Committee, available at: <https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.506.5817&rep=rep1&type=pdf> (accessed 11/06/21)

Scottish Government, (2019), *Get help to find a job*, Educational Pamphlet: Scottish Government: Edinburgh, available at: <https://www.mygov.scot/help-find-job> (accessed 08/10/21)

Scullion, L. and Morris, G., (2009a) *A Study of Migrant Workers in Peterborough*, University of Salford

Scullion, L. and Morris, G., (2009b), *Migrant Workers in Liverpool: A Study of A8 and A2 Nationals*, University of Salford

Shaw, J., (2009), Citizenship and Electoral Rights in the Multi-level 'Euro-polity': The case of the United Kingdom', *Edinburgh School of Law Working Paper Series* 2009/14

Sheffield City Council, (2015), *Sheffield Community Knowledge Profiles: Roma Community*, Educational Pamphlet: Sheffield City Council, available at:

<https://www.sheffield.gov.uk/content/dam/sheffield/docs/your-city-council/community-knowledge-profiles/Roma%20Community.pdf> (accessed 23/04/2020)

Sheffield City Council, (2019), *People's Services Portfolio Report for Children: Young People and Family Support Scrutiny Committee*, Sheffield City Council: Sheffield, available at:

<https://democracy.sheffield.gov.uk/documents/s34282/Support%20for%20Roma%20Children.pdf> (accessed 05/01/21)

Shutes, I., (2016), 'Work-related conditionality and Access to Social Benefits of National Citizens, EU and Non-EU Citizens', *Journal of Social Policy* 32(3): 440-453

Shutes, I., and Walker, S., (2018), 'Gender and Free Movement: EU Migrant Women's access to residence and social rights in the UK', *Journal of Ethnic and Migration Studies*, 44(1): 137-153

Sigona, N and Vermeersch, P., (2012), 'Editors' Introduction. The Roma in the New EU. Policies, Frame and Everyday Experiences', *Journal of Ethnic and Migration Studies*, 38(8): 1189-1193

Sibley, E., and Collins, R., (2014), 'Benefits for EEA migrants' *Journal of Poverty and Social Justice*, 22(2): 165-171

Social Marketing Gateway, (2013), *Mapping the Roma Community in Scotland: Final Report*, Research Report: Social Marketing Gateway, available at:

<http://www.migrationscotland.org.uk/uploads/files/documents/mappingtheromacommunityinScotlandreport-2.pdf> (accessed 23/04/2020)

Spencer, L., Ritchie, J., O'Connor, W., Morell, G., and Ormston, R., (2014), 'Analysis in Practice' in Ritchie, J., Lewis, J., McNaughton Nicholls, C., and Ormston, R., (eds.) *Qualitative Research Practice: A Guide for Social Science Students and Researchers*, 2nd Edition, Sage: London, pp. 295-346

Squire, V., (ed.), (2011), *The Contested Politics of Mobility: Borderzones and Irregularity*, Routledge: Abingdon

Steward, C., (2017), 'Glasgow's Roma community 'living in fear' over unfair Home Office targeting claims', *Glasgow Evening Times*, 12th December 2017, available at:

<https://www.glasgowtimes.co.uk/news/15715103.glasgows-roma-community-living-in-fear-over-unfair-home-office-targeting-claims/> (accessed 11/06/21)

Sumpton, M., (2021), *What now? The EU Settlement Scheme after the Deadline*, Policy Briefing, The Migration Observatory, University of Oxford, available at:

<https://migrationobservatory.ox.ac.uk/resources/commentaries/what-now-the-eu-settlement-scheme-after-the-deadline/> (accessed 01/08/22)

The Glasgow Centre for Population Health (n/d), *The Glasgow Indicators Project: Understanding Glasgow*, The Glasgow Centre for Population Health: Glasgow, available at:

https://www.understandingglasgow.com/indicators/economic_participation/overview (accessed 05/02/22)

- Themelis, S., (2015), 'The time of the Roma in times of crisis: Where has European neoliberal capitalism failed?', *Ethnicities*, 16(3): 432-451
- Temple, B., and Edwards, R., (2006), 'Limited Exchanges: approaches to involving people who do not speak English in research and service development' in Temple, B., and Moran, R., (eds.), *Doing Research with Refugees: Issues and Guidelines*, Policy Press: Bristol, pp. 37-54
- Thomas, P., Etherington, D., Jeffery, B., Beresford, R., Beel, D., and Jones, M., (2021), *Tackling Labour Market Injustice and Organising Workers: The View from a Northern Heartland*, Wales Institute of Social and Economic Research and Data: Cardiff, available at: <https://wiserd.ac.uk/publications/tackling-labour-market-injustice-and-organising-workers-view-northern-heartland> (accessed 05/02/22)
- Thym, D., (2015), 'The Elusive Limits of Solidarity: Residence Rights of and Social Benefits for Economically Inactive Union Citizens', *Common Market Law Review* 52: 17-50
- Van Baar, H., (2011), Europe's Romaphobia: Problematization, Securitization and Nomadization, *Environment and Planning D: Space and Society*, 29: 203-212
- Van Baar, H., (2012), 'Socio-Economic Mobility and Neo-Liberal Governmentality in Post-Socialist Europe: Activation and the Dehumanisation of the Roma', *Journal of Ethnic and Migration Studies*, 38(8): 1289-1304
- Van Baar, H., (2018), 'Contained mobility and racialization of Poverty in Europe: the Roma at the development-security nexus', *Social Identities* 24(4): 442-458
- Vermeersch, P., (2002), 'Ethnic Mobilisation and the Political Conditionality of European Union Accession: the case of the Roma in Slovakia', *Journal of Ethnic and Migration Studies*, 28(1): 83-101.
- Vermeersch, P., (2012), 'Reframing the Roma: EU Initiatives and the Politics of Reinterpretation', *Journal of Ethnic and Migration Studies*, 38(8): 1195-1212
- Vershuuren, H., (2007), 'European (Internal) Migration Law as an Instrument for Defining the Boundaries of National Solidarity Systems', *European Journal of Migration and Law*, 9: 307-346
- Vincze, F., Foldvari, A., Palinkas, A., Sipos, V., Eszter, A., Adany., R, Sandor, J., (2019), 'Prevalence of Chronic Diseases and Activity-Limiting Disability Among Roma and Non-Roma People: A Cross-Sectional, Census Based Investigation', *International Journal of European Research and Public Health*, 16(19): 3620
- Yeo, C., Sigona, N., and Godin, M., (2022), 'Parallels and Differences Between Ending Commonwealth and EU Citizen Free Movement', *Eurochildren Research Brief Series*, No. 4, available at: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4099553 (accessed 14/11/22)
- Yuval-Davis, N., Wemyss, G., and Cassidy, K., (2018) 'Everyday Bordering, Belonging and the Reorientation of British Immigration Legislation', *Sociology*, 52(2): 228-244

UK Immigration and Visas, (2021), *EU Settlement Scheme: Evidence of UK Residence*, Home Office Guidance, Home Office: London, available at:
<https://www.gov.uk/guidance/eu-settlement-scheme-evidence-of-uk-residence> (accessed 11/06/21)

Webb, J., Parken, A., Hodges, H., and Mathias, M., (2018), *Promoting Job Progression in Low Paid Sectors*, Research Report, Wales Centre for Public Policy: Cardiff, available at:
<https://www.wcpp.org.uk/wp-content/uploads/2018/11/Promoting-job-progression-in-low-pay-sect-ors.pdf> (accessed 10/01/21)

Wemyss, G., and Cassidy, K., (2016), “‘People think that Romanians and Roma are the same’: everyday bordering and the lifting of the transitional controls”, *Ethnic and Racial Studies*, 40(7): 1132-1150

Welsh, A., (2021), ‘A genuine chance of free movement? Clarifying the ‘reasonable period of time’ and residence conditions for jobseekers in G.M.A.’, *Common Market Law Review*, 58(5): 1591-1612

World Bank (2017), *Why we need to talk about Roma inclusion*, World Bank: Washington, available at: <https://blogs.worldbank.org/europeandcentralasia/why-we-need-talk-about-roma-inclusion> (accessed 18/07/21)

Wright, S., Dwyer, P., McNeill, J., and Stewart, A., (2016), *First Wave Findings: Universal Credit, Welfare Conditionality: Sanctions, Support and Behaviour Change*, University of York, available at <http://www.welfareconditionality.ac.uk/wp-content/uploads/2016/05/WelCond-findings-Universal-Credit-May16.pdf> (accessed 13/06/2020)

Wright, S., Stewart, A., and Dwyer, P., (2018), *Final Findings: Social Security in Scotland*, Welfare Conditionality: Sanctions, Support and Behaviour Change, University of York: York, available at <http://www.welfareconditionality.ac.uk/wp-content/uploads/2018/09/40677-Scottish-final2.pdf> (accessed 14/06/2020)

UK Immigration and Visas, (2021), *EU Settlement Scheme: Evidence of UK Residence*, Home Office Guidance, available at:
<https://www.gov.uk/guidance/eu-settlement-scheme-evidence-of-uk-residence> (accessed 11/06/21)

Zabiega, D., (2013), *Govanhill and migration*, powerpoint presentation, Govanhill Community Development Trust: Glasgow, available at:
<https://www.slideshare.net/nevenoe/david-zabiega-govenhill> (accessed 07/07/22)

Appendix

Ethics Approval



Downloaded: 15/02/2017

Approved: 14/02/2017

Lynzi Duncan
Registration number: 150252957
Politics
Programme: PhD

Dear Lynzi

PROJECT TITLE: Negotiating European Citizenship: A Study of the Rights of Central and Eastern European Romani Migrants in Scotland and England
APPLICATION: Reference Number 012709

On behalf of the University ethics reviewers who reviewed your project, I am pleased to inform you that on 14/02/2017 the above-named project was **approved** on ethics grounds, on the basis that you will adhere to the following documentation that you submitted for ethics review:

- University research ethics application form 012709 (dated 11/02/2017).
- Participant information sheet 1026962 version 2 (11/02/2017).
- Participant consent form 1026963 version 2 (11/02/2017).

If during the course of the project you need to [deviate significantly from the above-approved documentation](#) please inform me since written approval will be required.

Yours sincerely

Edward Hall
Ethics Administrator
Politics

Information Sheet



The
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Sheffield.

Project Title: Negotiating European Citizenship: A Study of the Rights of Central and Eastern European Roma EU Citizens in Scotland and England

You are being invited to take part in a research project analysing Roma experiences of European Union citizenship in the United Kingdom. It is important you understand the purpose of this research before agreeing to participate. Please read the following information carefully and if necessary, discuss it with others. Please ask if you require more information on the research project.

Project Scope: The purpose of this project is to identify and analyse the outcomes that arise from migration within the European Union, and in particular the impact of European Union policies in the United Kingdom. The project aims to ascertain the structure of government at national, subnational and local levels and understand how these structures impact on the rights of Central and Eastern European Roma EU citizens in Scotland and England.

Your Involvement: You have been invited to participate and provide qualitative material for this research project. You have been selected on the basis of your expertise. Your participation is voluntary. At any time, you are free to withdraw from the interview process and request the termination of any data you have provided. If you decide to take part, you will be given this information sheet to keep and be asked to sign a consent form.

Data Collection Process: The research project is based on the use of semi-structured interviews. You are free to not answer questions and may withdraw from the interview at any time. The interviews will be recorded. If you do not want to be recorded but still take part in an interview, a written transcript will be taken instead. At any moment you are entitled to request termination of recordings/transcripts related to your participation. After the information has been transcribed you will no longer be able to withdraw your participation. However, you will not be identifiable in any transcribed data. Recordings and transcript material will be stored securely and will only be accessed by the principle researcher, Lynzi Duncan.

Expected Outcomes Interview data is expected to provide evidence on the relationship between the legal framework of EU citizenship and political practice. Your participation will provide insight into the structure of European government in the UK and the impact of these structures on the rights of Central and Eastern European Roma EU citizens in Scotland and England.

Confidentiality: All information generated for this project will remain confidential. Your responses will be anonymised and the data you provide stored securely. If at any time you have complaints regarding the nature of this project, please submit a complaint to: lynzi.duncan@sheffield.ac.uk. If you wish to

Consent Form



The
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Participant Consent Form

Title of Research Project: Negotiating European Citizenship: A Study of the Rights of Central and Eastern European Roma EU citizens in Scotland and England.

Name of Researcher: Lynzi Duncan

Participant Identification Number for this project:
box

Please initial

1. I confirm that I have read and understand the information sheet dated explaining the above research project and I have had the opportunity to ask questions about the project.
2. I understand that my participation is voluntary and that I am free to withdraw at any time without giving any reason and without there being any negative consequences. In addition, should I not wish to answer any particular question or questions, I am free to decline.
3. I understand that my responses will be kept strictly confidential. I give permission for members of the research team to have access to my anonymised responses. I understand that my name will not be linked with the research materials, and I will not be identified or identifiable in the report or reports that result from the research. I understand that after the information that I provide has been analysed I can no longer withdraw but that my responses will be anonymised.
4. I agree for the data collected from me to be used in future research
5. I agree to take part in the above research project.

Interview Guide 1: Roma Respondents

Stage of the Interview	Objectives and Questions
Stage 1: Arrival and introduction	Initial introductions/ establish rapport
Stage 2: Introducing the research	<p>Explain the participant information sheet: aims, objectives of the project</p> <p>Explain the consent form: voluntary, anonymous, check how the participant would like to be identified.</p> <p>Explain that there are no right or wrong answers – aim is to hear the participant’s perspective in their own words.</p> <p>Check that the participant is happy to be audio recorded.</p> <p>Give the participant an opportunity to ask questions.</p>
Recording	<p>The code number for this interview is:</p> <p>The date today is:</p> <p>This interview is taking place in Sheffield/ Glasgow</p> <p>For the purposes of this recording, can you please confirm that we have discussed the project, and that you have given your consent to participate in the project?</p>

<p>Stage 3: Beginning the interview</p>	<p style="text-align: center;">Establishing a Baseline</p> <ol style="list-style-type: none"> 1. Can you start by telling me a you bit about yourself? <ol style="list-style-type: none"> A. Where are you from? B. How long have you been in the UK? C. Are you married, living with a partner, single, divorced etc.? D. Do you have any children? Do they live in the UK or your home country? How many? How old are they? E. If children in [country of origin] – how do you support them? F. Do you have any family in [country of origin] – Do you support them? How? 2. Can you tell me a bit about your life in Sheffield/ Glasgow? <ol style="list-style-type: none"> A. Who do you live with in Sheffield/ Glasgow? – partner, children, extended family etc. B. Where are you living at the moment? – social/ private accommodation, rent, own, sub-let, temporary accommodation, rough sleeping C. How long have you lived there? Where did you live before that?
<p>Stage 4(1): During the interview</p>	<p style="text-align: center;">Theme: Free Movement</p> <ol style="list-style-type: none"> 3. Why did you choose to move to the UK? <ol style="list-style-type: none"> A. Why did you move - seeking employment, friends/family? B. Why did you choose to move to the UK? – EU enlargement, seeking employment, friends and family C. Other than [country of origin] and the UK, have you lived anywhere else in Europe? 4. How did you come to be living in Sheffield/ Glasgow? <ol style="list-style-type: none"> A. How long have you lived in Sheffield/ Glasgow? B. Have you lived anywhere else in the UK? 5. How does life in the UK compare with life in [country of origin]? <ol style="list-style-type: none"> A. Is life in the UK better or worse than life in [country of origin]? B. Why? - availability of jobs, housing, wage levels, discrimination etc.

**Stage 4(2):
During the
interview**

Theme: Access to the Paid Labour Market and Unemployment

6. What did you do in [country of origin]?

Employed:

- A. Can you tell me about your job in [country of origin]?
- B. What kind of employment?
 - Employed or self-employed, full-time/part-time, permanent/temporary, zero-hour, licit/illicit
- C. Who was your employer?
 - Public/private, agency, government work programme

Unemployed:

- A. For how long?
- B. What were the circumstances that brought this about?
- C. Why were you unable to find work in [country of origin]?
 - Availability of work, health, level of education, lack of skills, discrimination
- D. What did you do for money? How did you survive?
 - Access social security provisions, financial support from friends and family, illicit employment

7. What do you do in Sheffield/ Glasgow?

Employed:

- A. Can you tell me about your current job?
- B. Are you employed or self- employed?
- C. Do you work full-time or part-time?
 - If part-time – Would you rather work full-time? Why/ why not?
- D. What kind of employment contract do you have? - permanent/ temporary, zero-hour, licit/illicit
- E. Who is your employer?
 - Public/private, agency, government work programme

- F. How long have you worked there?
- G. What are your working conditions? - unsocial hours, long shifts, health and safety standards etc.
- Unemployed:
- A. How long have you been unemployed for? What were the circumstances that brought this about?
- B. Is anything preventing you from finding work at the moment?
- availability of work
 - quality of job opportunities
 - language
 - level of education
 - lack of skills
 - discrimination
 - caring responsibilities

All Participants

- 8. Can you tell me about any previous experience of paid employment in Sheffield/ Glasgow?**
- A. Were you employed or self-employed?
- B. Did you work full-time or part-time?
- C. What kind of employment contract did you have? - permanent/ temporary, zero hour, licit/illicit
- D. What were the working conditions like? - unsocial hours, long shifts, health and safety standards etc.
- E. Who was your employer?
- Public/private, agency, government work programme.
- F. How long did you work there?
- G. Why did you leave?
- 9. It would be helpful to hear about your experiences of looking for work in Sheffield/Glasgow, can you talk me through it?**
- A. How did you go about looking for employment?
- job centre

	<ul style="list-style-type: none"> - employment agency - word of mouth - family and friends <p>B. What barriers, if any, have you encountered when looking for employment in Sheffield/ Glasgow?</p> <ul style="list-style-type: none"> - Language - Education - Skills - Discrimination - Caring responsibilities <p>10. In comparison to [country of origin] is the employment situation better or worse in Sheffield/Glasgow?</p> <p>A. Is it easier or harder to find employment in the UK than in [country of origin]? Why?</p> <ul style="list-style-type: none"> - Availability of jobs - Language - Education/skills - Discrimination - Exploitation - Support services <p>B. Is work better or worse in the UK than in [country of origin]? Why?</p> <ul style="list-style-type: none"> - Availability of work - Working conditions - Wage levels - Language - Discrimination - Exploitation - Career progression
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**Stage 4(3):
During the
interview**

Theme: Social Benefits

11. As an EU citizen, you may be entitled to social benefits in the UK. Have you ever applied for social benefits in the UK?

A. Which benefits?

- Housing benefit, JSA, Child Benefit, Child Tax Credit, Working Tax Credit, Income Support, ESA
- Do you receive or have you ever applied for Universal Credit?

B. When did you apply?

C. Why did you to apply for [appropriate provisions]?

- Change in circumstances – illness, unemployment, changes to working hours, relationship breakdown, etc.

12. It would be helpful to hear about your experiences of applying for [appropriate provisions], can you tell me about it?

A. Did you experience any difficulties when you attempted to access [appropriate provisions]?

- lack of understanding of the system
- required documentation
- language barriers – Were you offered interpretation services? When? How often do you receive this service? What happens if there is not an interpreter available?
- Discrimination – By whom? What happened?
- Advisor lacking an understanding of EU citizens’ rights – What happened?
- Have you been affected by the introduction of the benefits cap?
- Have you been affected by the introduction of the minimum earnings threshold for EU nationals? If yes – What happened? Did the minimum earnings threshold cause you difficulties when applied for [appropriate provisions]? What difficulties?
- Jobseekers – three-month wait for JSA, Child Benefit, Child Tax Credit, no right to Housing Benefit.
- Have you been affected by the introduction of the Genuine Prospects of Work Test for EU jobseekers? If yes - What happened? Did the Genuine Prospects of Work test cause you difficulties when applied for [appropriate provisions]? What difficulties

B. Did the difficulties that you experienced have an impact on your application for [appropriate provisions]?

- Delay in submitting the application – how long?
- Delay in processing claim – how long?
- Was your claim successful? If no – What reason was given for rejecting the claim?

C. What impact, if any, did these difficulties in accessing [appropriate provisions] have on you?

- Did you have difficulties paying for necessities as a result of [insert as appropriate] – housing, water, gas, electric, food, clothing, travel costs
- Did you experience poverty, homelessness, health problems (mental and physical), inability to attend appointments as a result of [insert as appropriate]?

How do these difficulties affect you and your family?

D. What did you do?

- Did you try to get help?
- Where did you go for help? – friends and family, Jobcentre Plus, CAB, the community centre, churches/charities.
- What kinds of support did you receive? – assistance with paperwork, financial support, interpretation, language training
- If claim was rejected - Did you appeal the decision? – What happened next? How long did the appeal process take? Was the appeal successful? Why/ Why not?

E. While you were experiencing these difficulties what did you do for money? /How did you survive?

- Paid work (cash in hand)
- Financial assistance from family and friends
- Pay day loans
- Hardship payments
- Local Welfare Assistance Fund/Scottish Welfare Fund
- Food banks, charities, churches
- Begging/rough sleeping/illicit activity

Jobseekers

13. Can you tell me about your experiences of claiming [appropriate provisions] in the UK?

- A. What help and support have you been offered in order to help you find work? - CV preparation, filling in job application

forms, a training programmes (work programme, language training etc.)

- B. By whom?
- C. When?
- D. How often? – daily, weekly, bi-weekly, etc.
- E. What do you think about the support that has been offered to you?
- F. Was the support helpful/useful?
- G. Do you feel that [insert as appropriate] understands your situation and your needs?
- H. How, if at all, has, your life changed as a result of [insert as appropriate]?

Jobseekers and Universal Credit claimants

14. What do you have to do in order to continue to receive [appropriate provisions] and support from [insert as appropriate]?

- A. Do you understand what you have to do?
- B. What would happen if you couldn't attend [insert as appropriate]?
- C. Have there been any occasions when you could not do the things that [insert as appropriate] required of you?
- D. Why? – illness, child care issues, return trip to country of origin, cost of travel, appointments, opportunity to work/ make money, etc.
- E. What happened as a result?
- F. Were you aware that this would be the consequence? Why/ why not? – claimant commitment, language
- G. Do you feel that the requirements put on you by [insert as appropriate] are reasonable/ realistic? Why/ why not?

15. Have you ever been threatened with or subject to a benefits sanction?

- A. When?
- B. Duration of sanction?
- C. What for?
- D. What did they say when they threatened you with/applied the sanction?

	<p>E. How many times has this happened?</p> <p>F. Were you aware that you could be sanctioned for [insert as appropriate]? Why/ why not? – claimant commitment, language</p> <p>G. How did you feel about it at the time?</p> <p>H. How do you feel about it now?</p> <p>I. Did the threat/ experience of a sanction change your behaviour in anyway? – continued to do the same, complied with the requirements, stopped engaging with services</p> <p>J. Do you feel that the sanction/ threat of a sanction was justified? Why/ why not?</p> <p>16. What impact did the threat/experience of being sanction have on you?</p> <p>A. Did you have difficulties paying for necessitates as a result of the sanction – housing, water, gas, electric, food, clothing, travel costs</p> <p>B. Did you experience poverty, homelessness, health problems (mental and physical), inability to attend appointments as a result of [insert as appropriate]?</p> <p>C. What impact did this have on your family?</p> <p>17. What did you do?</p> <p>A. Did you try to get help?</p> <p>B. Where did you go for help? – friends and family, Jobcentre Plus, CAB, the community centre, churches/charities.</p> <p>C. What support did you receive?</p> <p>D. If sanctioned - Did you appeal the sanction? What happened next? How long did the appeal process take? Was the appeal successful? Why/ Why not?</p> <p>E. If sanctioned - While you were subject to a sanction, what did you do for money? /How did you survive?</p> <ul style="list-style-type: none"> - Paid work (cash in hand) - Financial assistance from family and friends - Pay day loans - Hardship payments
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- Local Welfare Assistance Fund/Scottish Welfare Fund
- Food banks, charities, churches
- Begging/rough sleeping/illicit activity

All participants

18. In January 2014, the government made a number of changes to the circumstances in which EU nationals can access social security benefits. Can you tell me about your experiences, if any, of the new benefits system for EU nationals?

- A. Are you aware of these changes? When did you become aware?
- B. How do you feel about these changes?
- C. Do you feel that the changes are justified? Why/ why not?
- D. Do you feel that these changes will improve or worsen your situation? Why?
- E. What do you think that these changes are intended to achieve?
- F. Reduce the number of EU nationals claiming social security benefits
- G. Reduce the number of EU nationals in the UK

Stage 5: Ending the interview

Theme: Brexit

- 19. Has the Brexit vote changed your experiences of life in Sheffield/ Glasgow?**
- A. Why/ why not?
 - B. Has it been more difficult to access employment since the referendum?
Why/ Why not?
 - Lack of support/ services
 - Confusion about rights
 - Discrimination
 - C. Has it been more difficult to access social benefits since the Brexit referendum? Why/ why not?
 - Lack of support/ services
 - Confusion about rights
 - Discrimination
 - D. What impact have these difficulties had on you and your family?
 - Did you have difficulties paying for necessitates as a result of the sanction – housing, water, gas, electric, food, clothing, travel costs
 - Did you experience poverty, homelessness, health problems?
 - E. What did you do?
 - Did you try to get help?
 - Where did you go for help? – friends and family, Jobcentre Plus, CAB, the community centre, churches/charities.
 - What support did you receive?
 - How did you survive? - Paid work (cash in hand), financial assistance from family and friends, pay day loans, Hardship payments, Local Welfare Assistance Fund/Scottish Welfare Fund, Food banks, charities, churches, Begging/rough sleeping/illicit activity.
- 20. Are you aware of the proposed changes to the rights of EU nationals after Brexit?**
- A. What changes are you aware of?
 - B. Will these changes make it easier or more difficult for you to find employment in Sheffield/ Glasgow? Why?
 - Status/ right to reside

	<ul style="list-style-type: none"> - Circumstantial status – no jobseekers - evidence of a job offer and GPOWT and min earnings threshold - Proposed limits on low-skilled EU nationals - Proposed requirement for employers to seek UK nationals’ first - residence permit – discrimination, length of residence permits (up to 2 years for low-skilled), application process, cost, distrust of govt. - residence permit – discrimination, length of residence permits (up to 2 years for low-skilled), application process, cost, distrust of govt. - Discrimination - Exploitation <p>C. Will these changes make it easier or more difficult for you to access social security benefits?</p> <ul style="list-style-type: none"> - Why? - Status - Residence permit - Discrimination <p>D. Do you feel that these changes are fair? Why/ why not?</p> <p>21. What impact, if any, has the Brexit vote had on your future plans?</p> <p>A. What are your future plans?</p> <p>B. Have your plans changed as a result of the Brexit vote? Why/why not?</p> <p>C. Do you plan to stay in the UK? Why/ Why not?</p> <p>D. Do you plan to stay in Sheffield/ Glasgow? Why/ why not?</p> <p>E. Are there any other factors that may also be important? – availability of jobs, access to social security benefits, housing, wage levels, discrimination, exploitation etc.</p>
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Stage 6: After the interview	<p>Final Question: What is the most important point that you want me to take away from today?</p> <p>Give the participant another chance to ask questions – Do you have any questions for me?</p> <p>Thank the participant for their contribution</p> <p>If required, provide details for information or support services.</p> <p>Explain what happens with the data – reiterate how the information will be used.</p> <p>Take note of any ‘door step’ data that may be revealed.</p>
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Interview Guide 2: Key Policy Stakeholder Respondents

Stage of the Interview	Objectives and Questions
Stage 1: Arrival and introduction	<p style="text-align: center;">Initial introductions/ establish rapport</p>
Stage 2: Introducing the research	<p>The interview will take about an hour.</p> <p>Explain the participant information sheet: aims and objectives of the project.</p> <p>Explain the consent form: voluntary, anonymous, check how the participant would like to be identified.</p> <p>Explain that there are no right or wrong answers – aim is to hear the participant’s perspective in their own words.</p> <p>Check that the participant is happy to be audio recorded.</p> <p>Check how the participant would like to be identified.</p> <p>Give the participant an opportunity to ask questions.</p>
Recording	<p>The code number for this interview is:</p> <p>The date today is:</p> <p>This interview is taking place in Sheffield/ Glasgow</p> <p>For the purposes of this recording, can you please confirm that we have discussed the project, and that you have given your consent to participate in the project.</p>

<p>Stage 3: Beginning the interview</p>	<p>Use mapping questions to discover contextual background information about the participant.</p> <p>1. Can you tell me about your role working with the Roma?</p> <p>A. How long have you worked with the Roma?</p>
<p>Stage 4(1): During the interview</p>	<p style="text-align: center;">Theme: Structures of Governance</p> <p>2. What are the key objectives of the [participants] organisation?</p> <p>A. Does the organisation work with other groups (EU citizens, UK citizens etc.)?</p> <p>3. How do you deliver your services?</p> <p>A. What are the key services that the [participant's organisation] provides?</p> <p>B. How are these services delivered?</p> <p>4. In relation to the Roma, what work does [participant's organisation] do with other organisations in Glasgow and beyond?</p> <p>A. Can you tell me about [participant's organisation] relationship with [Westminster, City Council, Charities, other organisations in Sheffield/Glasgow]?</p> <p>5. What barriers, if any, do [participants' organisation] face when they attempt to support the Roma in Sheffield/ Glasgow?</p> <p>A. Funding</p> <p>B. Relationships with other organisations</p> <p>C. Lack of political will</p> <p>D. National Roma Strategy</p> <p>E. Non-engagement of the Roma community</p> <p>F. resentment/ hostility/competition from others</p>

**Stage 4(2):
During the
interview**

Theme: Free Movement

6. Why do Central and Eastern European Roma EU citizens choose to move to the UK?

- A. Free movement/ CEE accession
- B. Discrimination in country of origin
- C. Access to the paid labour market

7. Why do they choose to move to Sheffield/ Glasgow in particular?

- A. Following previously established migration routes
- B. Size of the Roma population – Why does Sheffield/ Glasgow have a substantial Roma population?
- C. Family reunification
- D. Employment opportunities
- E. Inter – UK migration

8. What impact, if any, do the resident Roma have on services?

- A. Which services – schools, NHS – GP practices, maternity services, etc., Job Centre Plus, council housing, local community centres etc.
- B. What impact do they have on services?
- C. Why do they have an impact on services?

9. In what ways, if at all, do the needs of the Roma differ from the needs of other recent migrant groups and/or more established groups?

- A. Do the Roma require more assistance than other migrant groups? Why?
- B. Are there differences within the Roma community? What differences? Why?

10. Have the needs of the Roma changed over time?

- A. More established – understanding of the system, language, support from the local community and/or other members of the Roma community
- B. Changes in the political and economic environment – recession, hostility towards migration, Brexit

	<p>C. Changes to status – Workers’ Registration Scheme, Seasonal Agricultural Workers Scheme (SAWS) and the Sector Based Scheme, changes to social security access in 2014.</p>
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Theme: Access to the Paid Labour Market

11. How do the Roma fair in relation to paid work?

- A. Are the majority of Roma people in Sheffield/ Glasgow employed/unemployed?
- B. What types of employment are they engaged in? – skilled, unskilled, manual, service industries, distribution facilities, etc.
- C. Who are the main employers of Roma EU citizens in Sheffield/ Glasgow? – public/ private companies, agencies, illicit organisations
- D. What type of employment contact do they have? - full-time/part-time, temporary/ permanent, zero hour, licit/ illicit
- E. What are their working conditions? – unsocial hours, long shifts, health and safety standards etc.

12. Is it easy or difficult for Roma people to find employment in Sheffield/ Glasgow?

- A. How do they look for employment? – Job Centre, local organisations, word of mouth etc.
- B. What barriers, if any, do they face when looking for employment? language, education/ skills, discrimination, exploitation, health, poverty
- C. Are there any factors that may also play a role? - availability of employment, suitability of employment opportunities that are available.

13. Why are Roma people unemployed?

- A. Do they face any particular difficulties in relation to sustaining periods of paid employment? Why?

14. In relation to employment and unemployment, are there any differences between Roma men and Roma women?

- A. What differences?
 - employed/ unemployed
 - types of employment (skilled/ unskilled, manual/ service industries etc.)
 - employment contract (full-time/ part-time, zero hour, licit/ illicit)
 - career progression

	<ul style="list-style-type: none"> - wage levels - discrimination - exploitation <p>B. Why are there differences between men and women?</p> <ul style="list-style-type: none"> - language acquisition - skill/ education level - marriage - caring responsibilities <p>15. How, if at all, does [participant's organisation] support the Roma to enter employment?</p> <p>A. What does [participants' organisation] do?</p> <p>B. How does [participant's organisation] offer this support?</p> <p>C. How often?</p> <p>D. How is the support accessed? – referral, walk in services etc.</p> <p>E. How is this support administered? By whom? Are any other organisations involved in providing this support?</p> <p>F. What is the key objective of the support offered?</p> <p>16. What barriers, if any, does [participant's organisation] face when they try to improve Roma EU citizens' access to labour markets?</p> <p>A. Availability/ quality of employment</p> <p>B. Non-engagement of the Roma community – language barriers, poverty, discrimination, mistrust of governmental organisations, gender</p> <p>C. resentment/ hostility/competition from others</p> <p>D. Relationship with other organisations – Westminster, local government, charities etc.</p> <p>E. Funding</p> <p>F. Lack of political will</p> <p>G. National Roma Strategy</p>
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**Stage 4(4):
During the
interview**

Theme: Social Benefits

17. As EU citizens, Roma people may be entitled to social benefits in the UK. Could you tell me about your experiences of Roma EU citizens claiming social provisions?

- A. Which benefits? – Housing benefit, JSA, Child Benefit, Child Tax Credit, Working Tax Credit
- B. Can EU nationals claim Universal Credit in Sheffield/ Glasgow? If so, how is an EU citizen's right to Universal Credit established? In what circumstances are they entitled to Universal Credit?

18. Do they face any particular issues when they attempt to claim social benefits?

- A. Lack of understanding of the system
- B. Language – Are they offered interpretation services?
- C. Discrimination – By whom? How common is discrimination?
- D. What bearing has the minimum earnings threshold had in relation to EU nationals' right to reside and Roma persons subsequent access to social security benefits? Why?
- E. JSA - What impact does the Genuine Prospect of Work Test have on Roma's access to social security benefits in the UK?
- F. If EU citizens cannot claim Universal Credit – Does, the refusal to extend Universal Credit to EU citizens create a barrier for Roma EU citizens when they attempt to claim social security provisions? Why/ Why not?
- G. Do benefits sanctions act as a barrier? Why/ Why not?
- H. Do Roma women face any particular difficulties when they attempt to claim social security difficulties or are their experiences largely the same was Roma men's experiences?
 - What are the differences?
 - Are Roma women or Roma men more or less likely to be affected by minimum earnings threshold, genuine prospects of work test and/or restrictions on Universal Credit, benefits cap
 - Why?

	<p>19. What is the impact of the recent restrictions on social benefits for EU citizens on Roma?</p> <p>A. What impact do the restrictions have on Roma EU citizens' social security applications? – Confusion about the rights of EU nationals, delay in processing, rejection of applications that would previously been successful.</p> <p>B. What impact does this have on Roma people and their families?</p> <ul style="list-style-type: none"> - What impact does the minimum earnings threshold have on Roma EU citizens in Sheffield/ Glasgow? – loss of right to reside, denial of social security benefits - poverty, exploitation, illicit employment, health (mental and physical) - What impact does the three month wait for JSA, Child Benefit, Child Tax Credit and the denial of Housing Benefits have on Roma jobseekers? – poverty, exploitation, illicit employment, health (mental and physical) - What impact does the Genuine Prospect of Work Test have on those who fail to find employment within the required six-month period? – poverty, exploitation, illicit employment, health (mental and physical) - What impact does the benefits cap have on Roma families? <p>20. Earlier we discussed the differences that Roma men and Roma women experience when they attempt to claim social benefits. I was hoping that you could also tell me about the differential impact of the restrictions on men and women?</p> <p>A. Do the restrictions have more of an impact on Roma women or is the impact largely the same regardless of gender?</p> <ul style="list-style-type: none"> - Why? <p>B. What impact do the restrictions have on Roma women and their families?</p> <ul style="list-style-type: none"> - Poverty - Exploitation - illicit employment - gender violence/ abusive relationships - health (mental and physical) <p>C. We also spoke earlier about benefits sanctions, I was hoping to ask you a bit more about this. What impact do benefits sanctions have on Roma EU citizens?</p>
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	<p>A. How common is it for Roma EU citizens to be subject to benefits sanctions in Sheffield/ Glasgow? It is more common for Roma EU citizens to be sanctioned than other EU nationals? Why?</p> <p>B. What are they sanctioned for? Are there any recurring circumstances?</p> <p>C. Are there gender differences in relation to sanctions? Are Roma women or Roma men more likely to be subject to sanctions?</p> <p>D. Why?</p> <p>E. Do sanctions, or the threat of sanctions, change their behaviour? In what ways? – attend training etc. as required, non-engagement with services etc.</p> <p>F. What impact do benefit sanctions have on the Roma people that you work with? – poverty, exploitation, illicit employment, health (mental and physical)</p> <p>G. Do you feel that this is justified? Why/ why not?</p> <p>20. How, if at all, does [participant’s organisation] support the Roma to access social provisions?</p> <p>A. What does [participants’ organisation] do? – interpretive services, language training, social security advisors, assistance in filling in forms</p> <p>B. How does [participant’s organisation] offer this support? – attendance at classes, online, one on one, group based</p> <p>C. How is the support accessed? – referral, walk in services etc.</p> <p>D. What is the key objective of the support offered?</p> <p>E. How is this support administered? By whom? Are any other organisations involved in providing this support?</p> <p>F. How successful is the support offered? How is success measured? Why is the support considered to be successful/ unsuccessful?</p> <p>21. What barriers, if any, does [the participants’ organisation] face when they try to improve Roma EU citizens' access social benefits?</p> <p>A. Non-engagement of the Roma community – language barriers, poverty, discrimination, mistrust of governmental organisations, gender</p> <p>B. resentment/ hostility/competition from others</p>
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	<ul style="list-style-type: none">C. Political environment – Brexit, social security restrictionsD. FundingE. National Roma StrategyF. Relationship with other organisations – Westminster, local government, charities etc.
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**Stage 5:
Ending the
interview**

Theme: Brexit

22. What impact has Brexit had on Roma in Sheffield/Glasgow?

- A. Free movement?
 - Population size?
 - Stay/move on?
 - Why?
- B. Has the Brexit referendum had an impact on the employment opportunities available to Roma EU citizens in Sheffield/Glasgow?
 - What impact?
 - Why?
- C. In what ways, if any, has the UK's vote to leave the EU impacted on Roma EU citizen's social benefit applications?
 - What impact?
 - Why?

23. After the UK leaves the EU, do you anticipate that the Roma in Sheffield/Glasgow will face any particular issues?

- A. What issues?
 - Settled status (5 years' residence)
 - Documentation of residence
 - Online application
 - Literacy
 - English language
 - Dissemination of information
 - same rights as they currently have
 - no guaranteed rights
- B. Will this have an effect on their ability to find employment?
 - Better/ worse? Why?
- C. Do you anticipate that this will have an impact on their rights to social security provisions?
 - Better/ worse? Why?
- D. What do you anticipate being the overall impact of these changes for Roma EU citizens living in Sheffield/Glasgow?
 - poverty, exploitation, illicit employment, health (mental and physical)
- F. Dependants – child poverty

	<p>24. What barriers, if any, does [participant’s organisation] now face as a result of the Brexit referendum?</p> <p>G. Uncertainty, lack of funding, relationship with other organisations, lack of political will</p> <p>B. Are these barriers currently having an impact on the services that you deliver to Roma EU citizens in the UK?</p> <p>H. What services?</p> <p>I. What impact?</p> <p>J. Why?</p>
<p>Stage 6: After the interview</p>	<p>Final Question: What is the most important point that you want me to take away from today?</p> <p>Thank the participant for their contribution</p> <p>Give the participant another chance to ask questions.</p> <p>If required, provide details for information or support services.</p> <p>Explain what happens with the data – reiterate how the information will be used.</p> <p>Take note of any ‘door step’ data that may be revealed.</p>

Table 1: Roma Respondents

Interview Code	Fieldwork Location	Nationality	Gender	Age at time of interview
SR01	Sheffield	Czech	Female	33
SR02	Sheffield	Slovakian	Female	27
SR03	Sheffield	Slovakian	Male	26
SR04	Sheffield	Romanian	Female	30
SR05	Sheffield	Slovakian	Male	24
SR06	Sheffield	Slovakian	Male	35
SR07	Sheffield	Slovakian	Male	47
SR09	Sheffield	Slovakian	Male	37
SR10	Sheffield	Slovakian	Female	38
SR11	Sheffield	Slovakian	Female	36
SR12	Sheffield	Slovakian	Male	44
SR13	Sheffield	Slovakian	Female	50

SR14	Sheffield	Slovakian	Male	55
SR15	Sheffield	Slovakian	Male	22
SR16	Sheffield	Slovakian	Female	33
GR01	Glasgow	Romanian	Male	29
GR02	Glasgow	Slovakian	Female	35
GR03	Glasgow	Slovakian	Female	55
GR04	Glasgow	Slovakian	Male	54
GR05	Glasgow	Slovakian	Female	29
GR06	Glasgow	Slovakian	Female	42
GR07	Glasgow	Slovakian	Female	30
GR08	Glasgow	Slovakian	Female	41
GR09	Glasgow	Slovakian	Male	34
GR10	Glasgow	Romanian	Female	27
GR11	Glasgow	Romanian	Female	20
GR12	Glasgow	Romanian	Female	47
GR13	Glasgow	Romanian	Female	19

GR14	Glasgow	Romanian	Female	20
GR15	Glasgow	Romanian	Female	20

Table 2: Key Policy Stakeholder Respondents

Interview Code	Fieldwork Location	Identifier	Gender
SKPS01	Sheffield	Development Coordinator	Male
SKPS02	Sheffield	Policy and Information Worker	Male
SKPS03	Sheffield	Citizens Advice Worker	Female
SKPS04	Sheffield	Policy and Research Manager	Female
SKPS05	Sheffield	Supervisor Citizens Advice	Male
SKPS06	Sheffield	Community Services Manager	Female
SKPS07	Sheffield	Former Council of Europe Employee	Male
SKPS08	Sheffield	Policy Advisor	Female
SKPS09	Sheffield	Researcher	Male
SKPS10	Sheffield	Councillor	Male

SKPS11	Sheffield	Academic	Female
SKPS12	Sheffield	Sheffield City Council Employee	Female
SKPS13	Sheffield	Senior Policy Advisor	Male
SKPS14	Sheffield	Middle Manager DWP	Male
SKPS15	Sheffield	Senior Policy Advisor	Female
GKPS01	Glasgow	Local Councillor	Male
GKPS02	Glasgow	Community Worker	Male
GKPS03	Glasgow	Service Coordinator	Female
GKPS04	Glasgow	Community Worker	Female
GKPS05	Glasgow	Welfare Advisor	Female
GKPS06	Glasgow	Development Manager	Male
GKPS07	Glasgow	Inclusion Specialist	Female
GKPS08	Glasgow	Advice Worker	Male
GKPS09	Glasgow	Outreach Officer	Female

GKPS10	Glasgow	Development Worker	Female
GKPS11	Glasgow	Development Worker	Female
GKPS12	Glasgow	Community Worker	Male
GKPS13	Glasgow	Social Welfare Lawyer	Female
GKPS14	Glasgow	Sessional Worker	Female
GKPSK15	Glasgow	Project Worker	Female