

Journal of Immigration, Asylum and Nationality Law/2009 - Volume 23/Issue 2, 1 June/Articles/Why Semi-Legal? Polish post-2004 EU Enlargement Migrants in the United Kingdom - (2009) 23 IANL 148-164

Journal of Immigration, Asylum and Nationality Law

(2009) 23 IANL 148-164

1 June 2009

Why Semi-Legal? Polish post-2004 EU Enlargement Migrants in the United Kingdom

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Asylum, Immigration & Nationality

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At a glance

This article explores the responses of Polish post-2004 EU Enlargement economic migrants towards British rules and regulations, which determine the character of their work and residence in the United Kingdom. The focus of the empirical part of the research is on attitudes and values, namely shared cultural meanings, and how they are behaviorally expressed with respect to law and legal institutions. The paper focuses on the intricacies of immigrants' choice of 'semi-legal' over legal status, subsequent legalization strategies, and the interpretations of legality these practices result in. What role in this process is played by the legal culture, the experience of law which migrants brought with them from Poland? The article concludes that legality could be discussed at two levels -- at the behavioural level and at the level of a value. Changing status between the two poles of legality and illegality brings with it greater appreciation of legality, as a value.

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The 2004 EU Enlargement resulted in the mass influx of Eastern European migrants to the United Kingdom, of which Poles constitute the largest group. Polish migrants, as well as other migrant workers from new EU member states, can take up a legal job and reside legally in the United Kingdom upon complying with a set of conditions enacted by the British government in legislation of 2004, one of which is about joining the Workers Registration Scheme (WRS). However, upon arrival in the United Kingdom many Polish migrants do not comply with these rules -- they fail to register their employment, register late, or do not register fully. Although they have no problems clearing Immigration at airports and ports, their legal status with regard to their employment and residence in the UK remains semi-legal, or using Victor Turner's concept of liminality, migrants find themselves in the gray sphere between the legal categories of legal or undocumented migrants, in the sphere of liminal legality.¹

This article asks why migrants decide to remain within the border between legal and illegal, acceptable and forbidden, risking becoming victims of each other's mistrust and domination, while the road to legalizing their stay is open, and registration, objectively speaking, is actually in their own interest? This article is an attempt to understand why migrants choose to remain in a semi-legal status, what are the factors that shape their decisions, and what are the consequences of their choices for semi-legality over legality.

I argue that this particular semi-legal status of many Polish post-2004 enlargement

(2009) 23 IANL 148-164 at 149

migrants, who are nevertheless EU citizens exercising the right to free movement, results from the complex interplay between the British legal environment and the image of law that migrants brought with them from home -- their legal culture. That particular legal status in turn influences how migrants relate themselves to the law and legality in the UK.

Legal status -- the puzzle

The legal status of Polish migrants in the United Kingdom, as well as access to the labour market, are regulated by British legislation put in place in 2004 by the way of derogation from art 39 EC (Free movement of workers) and arts 1 to 6 of Regulation 1612/68, on the freedom of movement for workers within the Community laid out in the Accession Treaty. Polish migrants coming to the UK can take up a legal job. However, to legally access the British labour market and to reside legally in the United Kingdom they, as well as other workers from the Accession States,² should comply with three pieces of British legislation: The Accession (Immigration and Worker Registration) Regulations 2004 (SI 2004/121), Social Security (Habitual Residence) Amendment Regulation 2004 (SI 2004/1232), The Immigration (European Economic Area) and Accession (Amendment) Regulations 2004 (SI 2004/1236). Migrant workers are required to register with the Home Office under the WRS within one month of taking up a job. They should remain within the scheme for twelve months, after which they are no longer required to register, and gain full rights as other EU nationals of the old fifteen member states. In practical terms it means that Polish migrants are included within the welfare and benefits system, and pass the habitual residence test required for many means-tested benefits only when the twelve month transition period under the WRS is completed. Within these initial twelve months, however, Polish migrants have to re-register each time they change the employer. If the time period between two jobs (and two registrations) is longer than 30 days, they are required to work towards the complete twelve months from the beginning of the new post. Upon registering they gain access to in-work benefits (mainly tax credits), and as long as they remain within the scheme, they are working legally in the United Kingdom.

According to the Home Office Accession Reports a cumulative total of 926,000 A8 nationals joined the WRS between May 2004 and December 2008.³ The majority of them are Poles (66 per cent of the total).⁴ There are, however, no official statistics about those migrants who, having had no problems clearing Immigration when they arrived, either failed to register with the WRS, registered late (more than a month after taking up a job), or did not register fully (eg joined the scheme with only one employer, whilst working for two or three of them at the same time). In light of British legislation their employment and stay in the United Kingdom is semi-legal and puts the migrants in the sphere of liminal legality.⁵

The concept of *semi-legality* is not new. Bridget Anderson and Martin Ruhs referred to it as 'semi-compliance'⁶ when examining the situation of East European economic migrants in

(2009) 23 IANL 148-164 at 150

the United Kingdom before the 2004 EU Enlargement. In their research they investigated the employment experiences of many East European migrants (including Polish migrants), who functioned in the British market especially in the low wage, low-skilled sector (agriculture, construction, hospitality and the au-pair sector).⁷ Their research captured the ambiguous legal situation of migrants, who worked and resided in the UK in breach of some of the conditions attached to their immigration status. They had either been admitted to the UK on student visas or worked more than the visa conditions allowed them to, or had been admitted to the UK on the basis of joining a particular scheme (eg Seasonal Agriculture Scheme) but found themselves working in industry or services. To fully account for the migrants' legal status as a potential determinant of both employer demand and the conditions of migrants' employment, Anderson et al introduced the concept of semi-compliance. It identified and diagnosed the legal status common for many Eastern European migrants in the UK before the EU Enlargement. From 1 May 2004, the majority of the previously 'semi-compliant' or 'semi-legal', Eastern European migrants became EU citizens and were allowed to legally

enter the UK and join the British labour market. In this context Ruhs talks about an amnesty for the Polish visa over-stayers and semi-legal immigrants in the United Kingdom.⁸ However, the change in the migrants' legal status, due to the British legislation put in place by the way of derogation from certain provisions of EU law placed in the Athens Accession Treaty, might have been more ambiguous and less overnight than initially anticipated. Polish migrants (as well as other A8 migrants) in the UK did not become legal overnight, but were given a set of conditions and transitional measures (joining the WRS, working toward 12 months of transitory period) and could ultimately legalize their stay and work in the United Kingdom if they complied with these. If they did not fulfill these conditions their work and residence continued to remain semi-legal. In my research with Polish post-2004 EU Enlargement migrants I discovered that semi-legal status is still very much a prevalent phenomenon. Therefore the legitimate question to ask is why the migrants themselves actually choose to retain this semi-legal status, even against their own interest (the lack of registration indefinitely delays the process of inclusion into the welfare system and support)?

I also draw from the works of Cecilia Menjivar, who used the concept of *liminal legality*,⁹ the gray sphere between the legal categories of legal or undocumented migrants, to describe the status of Salvadoran and Guatemalan Immigrants in the United States.¹⁰ Menjivar explored the impact this particular in-between, temporary legal status has on immigrants' family networks, the place of the Church in immigrants' lives and the forms of their artistic expression. I will, however, navigate away from this idea, and employ the concept of liminal legality to investigate how Polish migrants sharing this uncertain legal status interpret their everyday actions and experiences within the framework of law and legality. How do they relate themselves to the law, how do they judge their actions with reference to the legal/illegal?¹¹

This paper consists of two parts. The first part investigates the two main factors, whose complex interplay results in the semi-legal status of many Polish migrants: the British legal environment (legal rules and their enforcement) and the migrants' legal culture (values and

(2009) 23 IANL 148-164 at 151

attitudes with regard to the law). To support the above argument I employ the cultural, reflexive approach to law introduced by Patricia Ewick and Susan Silbey in their research on law in everyday life.¹² The second part of the paper focuses, in turn, on how the particular liminal, semi-legal status shared by many Polish migrants influences how legality is experienced and interpreted by ordinary people as they engage with, avoid or resist the law in everyday life. Polish migrants see legality as fluid and gradual, and themselves as occupying different stages on the continuum between illegality and legality over time. As a result of such an interpretation, the semi-legal status itself is not static, but dynamic and changing, as migrants, to satisfy the needs of everyday life existence, move between the two poles of illegality and legality, in the majority of cases -- towards the latter.¹³ Lastly, the paper investigates the consequences that the behavioural moving status toward (greater) legality has on the interpretation and internalization of legality as a value.

In the analysis of the British legal environment and migrants' legal culture as factors through which migrants' status of liminal and semi-legality could be explained and understood, and in investigating the effects of the legal status of Polish migrants on their interpretation of law and legality, I rely on the empirical data coming from fieldwork I conducted among Polish migrants in Oxfordshire and Berkshire between 2007 and 2008. I employed their narratives of the immigration experience as a form of social action, and these stories thus reflected and sustained the institutional and cultural arrangements migrants were socialized into in Poland and, at the same time, they were bridging the gap between daily social interactions and large-scale social structures of British law and society. Snow-ball and chain-referral sampling were used to select respondents. This primary data, derived from complete thirty-five in-depth, semi-structured interviews, a number of shorter interviews and observations among post-2004 EU Enlargement Polish migrant communities, was supplemented by observations during voluntary work at Citizens Advice Bureau over a period of 12 months.

The formation of legality

Ewick and Silbey use legality to distinguish between the social institutions of law -- actors and organizations that make and apply law (*the law*) -- from the social actions constituted by interpretive schema and human

and material resources.¹⁴ They integrate both spheres of human action and structural constraint in a cultural analysis of legality,¹⁵ where actions and interpretations given by individuals to their world -- and law and legal institutions as part of the lived world -- become repeated, patterned, stabilized and these stabilized patterns become part of the meaning system deployed by, as well as constraining, the individual.¹⁶ Ewick and Silbey's approach attempts to integrate human agency and structural constraint by showing how individual understandings and social interactions aggregate to partly shape institutions while

(2009) 23 IANL 148-164 at 152

institutions and larger social structures provide the foundations for and constraints on individual understanding and social interaction.¹⁷

Legality, in this sense, is an analytical concept, which reconciles the structure (the law) and the role of social agents, exists at the same time as an objective phenomenon and experienced human construction, and is both an ideal and space of practical action.¹⁸ It is crafted by ordinary people operating creatively under certain structural and institutional constraints. Such an interpretation enables one to define legality in pluralistic terms both at the level of behaviour -- as an objective status of acting in accordance with the law -- as well as at the level of values -- incorporating multiple, sometimes contradictory, normative claims. The second meaning employed by Ewick and Silbey refers to the meanings, sources of authority and cultural practices that are recognized as legal, regardless of who employs them, and for what ends.¹⁹

The cultural analysis proposed by Ewick and Silbey emphasizing the reciprocal process between the structure and the individual agents, can serve as a methodology to explore the problem of why a large group of Polish migrants in the United Kingdom reluctantly comply or do not comply with British law and regulations governing their lives and access to the labour market. To summarise, my thesis is that migrants' status of liminal or semi-legality is a result of both structural constraints (legal environment) and subjective (cultural) predispositions. The interplay between the legal environment and migrants' legal culture in turn influences how the migrants relate themselves to and interpret legality in everyday life.

The reasons for the reflexive cultural analysis, integrating both structural and cultural contexts is that neither a determinist nor an idealist perspective by itself would sufficiently serve to explain the problem. By employing the determinist account, one risks neglecting the actual work people do in choosing a particular strategy to deal with the body of law, and erases the subjects from the field of analysis, giving priority to structural determination of the actions and choices. On the other hand, the idealist perspective, focusing on legal culture as a set of preferences and potential behaviours, fails to take into account the different options available to people within the legal environment where they operate, in fashioning their interpretations and behaviours. Polish migrants bring with them to the UK, apart from their physical luggage, the specific luggage of legal culture. However, how they act with respect to law and how they interpret law and legality is, to a large extent, also conditioned by the legal environment they arrive to in the UK. In the following section, I investigate the role of British legal environment and migrants' legal culture as factors behind many Polish migrants' choice to retain the semi-legal status.

Legal environment

The importance of the broader legal environment, ie extra-personal factors such as migration laws and the labour market that together shape the opportunity structures for migrants lives is well known.²⁰ The immigration laws determine who stands inside or outside the law (or in

(2009) 23 IANL 148-164 at 153

between) and also dictate whether migrants have access (or partial access) to resources, of which kinds, and for how long. The legal, political and economic context that migrants arrive into results either in a favourable reception or an adverse one. In this paper, I focus particularly on three aspects of the legal environment. Firstly, I investigate the nature and character of the immigration laws designed by the British government for migrants from the new EU member states as a compromise between the interest of the state and the EU principle of free movement. Secondly, I examine the scope and constraints to the enforcement of these rules. Finally, I concentrate on the specific precarious working and living conditions common to all

migrant workers in the UK (and therefore also to Polish migrants).

Although the legal arrangements of the 2004 EU Enlargement and the accession of 10 new member states to the European Union were decided in the Accession Treaty signed in Athens on 16 April 2003, the Treaty included certain pre-determined transitional arrangements, which provided for derogations from the *acquis* by the fifteen (old) EU members and the new member states.²¹ According to the Accession Treaty (the relevant provision is found in art 24, Act of Accession 2003, Annexes) the fifteen were entitled to derogations from art 39 EC (Free movement of workers) and the first paragraph of art 49 EC (Freedom in the provision of services within the EU) with respect to the eight new Members from Central and Eastern Europe but not with regard to Cyprus and Malta. By the terms of the Annexes to the Treaty of Accession (art 24, Act of Accession 2003), the fifteen EU member states also derogated from arts 1 to 6 of EEC Regulation 1612/68, on the freedom of movement for workers within the Community, which specified the conditions of access to the labour market that could be limited in the transitional period. The UK was one of the countries that granted the citizens from the new EU member states (including Poland) access to the labour market on 1 May 2004 on the conditions specified in national regulations.

The laws put in place by the UK for the migrants from the new EU member states, although fairly liberal in comparison to the immigration policy of other old EU member states (Germany or Austria, for example), did not make the migrants full recipients of the free movement of persons principle, but set out certain conditions to obtaining such a status. Those migrants who were admitted into the UK on the basis of European citizenship but who failed to comply with the British (national) laws conditioning their legal employment and residence find themselves in the in-between sphere between legal and illegal, acceptable and forbidden. On the grounds of the Social Security (Habitual Residence) Amendment Regulation 2004 (SI 2004/1232) they are excluded from participation in the welfare system and access to benefits otherwise available to EU national workers and work seekers on the basis that they have not worked for a full 12 months. If they fail to register with the WRS within one month of taking up a job, their employment -- in the context of the Accession (Immigration and Worker Registration) Regulations 2004 (SI 2004/121) -- becomes illegal.²² However, according to European law, as European citizens, they do not face the risk of deportation.²³

The power of exclusion and the overall character of the British legislation results from the struggle for compromise between the national, state interest and the EU principle of free

(2009) 23 IANL 148-164 at 154

movement. The 2004 Regulations were enacted to protect the British social security system from 'welfare tourism', and to ensure that Great Britain will enjoy the benefits of labour migration. At the same time, as non-discrimination is a fundamental principle of Community law, it was extremely unlikely that the Community would turn its back on decades of progress and permit member states to benefit from labour migration without imposing at least some social responsibilities towards the migrants -- '[...] Member State cannot provide less protection or afford less social rights to accession state nationals than would be afforded to any other EU national.'²⁴ Hence the WRS was put in place as a compromise -- to monitor the scale of migration, to regulate access to the welfare system for A8 workers, but not to reduce the number of migrants. This normative internal contradiction of law resulting from its ambition to accommodate both, the nation state interest and EU principles, has weakened its meaning.

The lack of clear executive clauses in the 2004 Regulations -- 'the unregistered worker *may* (my emphasis) have to stop working'²⁵ -- point to a conclusion that it is a 'soft' law, a law which has lost its coercive power, and is implemented rather by negotiation and the reasoning behind it, than the prospect and fear of punishment. If a migrant worker from the accession state does not apply to join the WRS scheme within one month of starting a job, the employment becomes illegal after that date. There is, however, no mention of any legal consequences for the worker failing to register, apart from the practical issue that any time a worker spends working in the UK illegally will not count towards the 12-month qualifying period to become exempt from registration. As the law does not have the quality of prohibition, non-compliance does not make one feel as if one is actually breaking the law:

'There are no consequences. There is no formal punishment for not registering; they can remind you to register but they cannot force you to register by, for example, making you to pay a fine [Interview, No. 5].

Generally, you have the right to live in the UK and to work. I did not feel pressured to register, or anything. The registration comes in handy only when you want to claim any benefits [Interview, No. 6].'

With no real coercive power, and without the power of punishment, all the law is left with is its power of exclusion. When migrants from the new EU member states fail to register their employment under the 2004 Regulations they become indefinitely excluded from full participation in the welfare system. In this way the law acts as a barrier to benefits and social support. The law is there to exclude those who do not comply rather than to impose the rules in general.

The second important aspect of the legal environment is how these, even so 'soft' and toothless rules and regulations, are actually enforced and executed in the United Kingdom, and how law enforcement influences Polish migrants' responses to the law.

According to British law, the enforcement of the 2004 Regulations (particularly the WRS) is passed to the employer. The law says that the employer, who continues to employ an unregistered worker may be committing a criminal offence, and face legal sanctions -- a fine of up to 5,000 pounds.²⁶ Although on 1 May 2004, the British government introduced measures

(2009) 23 IANL 148-164 at 155

to strengthen the enforcement of s 8 of the Asylum and Immigration Act 1996 (as amended by s 147 of the Nationality, Immigration and Asylum Act 2002) which made employers in general responsible under the regulations for ensuring that they were authorised to employ a worker from one of the eight Accession States affected by the WRS,²⁷ conviction rates following section 8 prosecutions remained very low. Between 1998 and 2005, 17 employers (including eight employers in 2004) were successfully prosecuted for illegally employing migrants under s 8. More than half of s 8 convictions in 2004-05 resulted in fines of less than 700 pounds, with four employers fined the maximum of 5,000 pounds.²⁸

According to the Home Office 2006 report on employers' use of migrant labour, employers expressed no knowledge of illegal working, whereas others actually were or had been recruiting illegally. This was reportedly owing to their ignorance concerning registration procedures and their responsibilities as employers. Some employers admitted the procedures were too time consuming to deal with and sometimes 'turned a blind eye' to workers of unknown legality.²⁹ On the other hand, many employers, who recruited through recruitment agencies, assumed that the agencies made appropriate checks.³⁰

From the migrants' point of view, the character of the WRS registration -- especially the lack of practical and legal consequences for the worker who fails to register, as well as the initial cost of the registration (between £50 and £90) -- act, to a certain extent, as deterrents to comply with this regulation. As a result, many of the migrants, due to financial constraints and scarce resources, especially upon arrival in the United Kingdom, preferred to postpone registration for later, after the initial priorities and instrumental needs are taken care of (steady income, bank account and accommodation).³¹ The inconsistent enforcement and popular practices of 'turning a blind eye' to migrants of unknown legality do not inspire migrants' confidence in the WRS and make the registration look *pro forma* -- as an unnecessary burden and trouble:

'After the first year I have been working for the cafe, they wanted me to have it done [WRS]. So after one year they were sending me signals to do it, to register. So I finally did it. But later on they employed another person, who did not have WRS, who did not have NIN [National Insurance Number] and it was ok [Interview, No. 30].

I started the new job and I had to re-register with the WRS. I received the documents from the lady in our office, but I was not in a hurry to fill them in and to post them. Then the office lady had left, and the new one was not particularly interested in my case, so I also gave up [Interview, No. 23].'

The evidence of inconsistent law enforcement with regard to the registration rules designed for migrants from new EU member states suggests that the British state itself adopted a 'soft'

(2009) 23 IANL 148-164 at 156

approach towards enforcing this legislation. The WRS was put in place to monitor the scale of migration and not to reduce the number of migrants. Paradoxically, the recent reports show that it failed to deliver accurate figures and lowered the actual numbers of Eastern European migrants by not taking into account those working and living in the United Kingdom in the in-between sphere of legal/illegal. These inconsistencies made the scheme less relevant and less important from the perspective of the British authorities. Additionally, to enforce these rules could prove to be a very time consuming and costly project, therefore, not very beneficial to the state.

Thirdly, the legal environment as it impinges on Polish migrants, could also be examined from the perspective of precarious working and living conditions experienced by all migrant workers in the United Kingdom. The low-wage and low-skilled sectors of the labour market where large groups of migrants find employment initially are very well documented for low legal awareness and law enforcement.³² In order to maximize their profit employers operating within these sectors rely on flexible labour supplied by employment agencies.³³ The employment agencies supplying workers for the low-skilled, low-wage sectors of the economy are an inseparable part of the British flexible labour market. Since the 1990s, an increasing number of people find employment through such agencies. Employment agencies are also very popular among the post-2004 migrants from Poland and other Eastern European countries.

The general character of employment businesses in the UK, however, does not give rise to an employment relationship in law between the employment business and a worker or work seeker, which makes work security regulations very difficult to enforce. This makes it easy for the agencies to drift into the grey area of employment legislation subject to abuse of rules and power. This allows different groups of the regulated to operate according to their own 'rules of the game' even though such interactions might be subversive to the legal system. Agency workers are not employees (which, under UK employment law, are defined as those employed under a contract of employment in the narrow sense of the term³⁴) and therefore have no right to statutory notice, the right to claim unfair dismissal, redundancy or the right to return after a period of maternity related absence.³⁵ Also the enforcement of basic statutory rights, guaranteed by the 2003 Regulations with regard to agency workers -- such as: to be paid according to the national minimum wage legislation, the right not to be forced to work more than 48 hours per week, the right to protection of their health and safety while at work, paying taxes and national insurance contributions -- are very ambiguous and often questionable.³⁶ Not surprisingly then, when the WRS was introduced, many employers operating within the low-skilled, low-wage sectors, especially recruitment agencies, did not take it seriously.

(2009) 23 IANL 148-164 at 157

Many Polish migrants, who arrive in the UK without sufficient financial, cultural resources (knowledge of English) and social capital (eg migrant networks), find themselves working in the 'grey area', often operating at the border between legal/illegal, acceptable and forbidden. The nature and character of precarious work within the low-wage, low-skills sectors do not inspire much confidence in law in general:

'I am certain that in the agency there were two people directly responsible for the recruitment: two guys. And you had to bribe them to get any kind of job. When I came three years ago, you had to have something with you if you wanted a job, some alcohol or Polish sausages; without the gifts it was very difficult to get a job. And one more thing -- you did not need to speak any English, you did not need National Insurance Number, you did not need to register with WRS -- it was like that three years ago. I am not sure how it is now, though [Interview, No. 13].'

Lastly, the lack of consistent enforcement of the registration on the part of the British authorities could be explained by the fact that compliance with the rules was originally thought to be in the interest of the migrants themselves. Upon registering with the WRS, they work toward the 12 month period, upon completion of which they become fully included in the welfare system, pass the habitual residency test and therefore gain access to contributory and means-tested benefits. Why, then do many Polish migrants not comply with these rules and therefore decline to gain from registering their employment and fully legalizing their stay? There are other factors stemming from the migrants themselves -- their individual goals, actions, image and experience of law, their legal culture -- which could prove helpful in addressing the question. Many Polish migrants, who come to the UK, agree that instrumental considerations (short stay with the plan to earn and save money) took priority over others in motivating them to migrate; they come with limited knowledge of British law, scarce cultural and social resources (limited knowledge of English), and share specific attitudes and values with regard to the law. These equally prove to play an important role in explaining the continuation and prevalence of their semi-legal status.

Polish legal culture

Legal culture is an established term in the scholarship of socio-legal studies. At the same time, this concept is one of the most general and ubiquitous in the study of law and society. Working with legal culture opens a Pandora's box of initial problems and dilemmas. Various scholars argue that the all-inclusive nature of the concept makes it theoretically incoherent, as it explains too much and tends to be a self-contained 'super-organic' reality.³⁷ Even Lawrence M. Friedman, the greatest advocate of legal culture, agrees that it serves more of an artistic than a scientific function, as it allows an impression of general tendencies to be sketched.³⁸ There is a problem with using culture as an explanatory concept. Formal definitions of 'legal culture' vary tremendously across disciplines and scholars.³⁹ Some authors have even suggested that the term

(2009) 23 IANL 148-164 at 158

is so misleading that it should be abandoned in favour of other alternative concepts such as legal tradition⁴⁰ or legal ideology⁴¹ or legal consciousness.⁴²

All these arguments point to a conclusion that legal culture is not an easy concept. However, as Friedman notices, many of the basic concepts of social science -- fundamental ones, such as structure, institution or system -- are vague and general, hard to define or delimit.⁴³ And this factor does not make them necessarily incoherent, unsuitable or irrelevant for the purpose of social research. Legal culture is one of these concepts that are useful ways of lining up a range of phenomena -- social beliefs, opinions, values and outlooks -- into one very general category (heuristic usage). The notion of legal culture employed here derives from the original definition of legal culture by Lawrence M Friedman, where legal culture, as part of general culture, 'relates to those parts of general culture -- customs, opinion, and ways of doing and thinking -- that bend social forces toward or away from the law'.⁴⁴ The notion encompasses a particular configuration of values, attitudes and behaviour to law -- how they are intertwined, what they produce and the complex interplay between them. The stress on 'configuration', on how the values, attitudes and behaviour transcend particular individuals and their cognition, and are aligned to create a distinguishable pattern is particularly important, as different configurations would inevitably produce a different outcome in the form of a different legal culture. This results from the methodological approach to culture employed here -- culture is employed as something to be explained, explored and given a 'thick description'.⁴⁵

Of course, no two people have the same ideas and values about law, behave identically, or have the same political views. Although it is the Polish legal culture that constitutes the main unit of analysis, I am far from assuming that all Polish migrants in the United Kingdom will share the same legal culture. While modern nation states, as relatively stable, defined and powerful, are the most obvious mechanisms capable of sustaining the conditions necessary for normative orientations to emerge and be maintained through

socialization within such institutions as the family, the educational system, state, legal order, etc, other formal and informal organizations with such capacities can be noted (including national and ethnic groups, local communities, social occupations and classes, religious groups and others).⁴⁶ Therefore, not all migrants would draw from the same cultural resources, and this situation leads to disparate outcomes at the destination area. This research is however underpinned by a general assumption that some common tendencies, patterns of behaviour and attitudes to law could be distinguished. In a similar vein, Friedman argues convincingly, that 'although no two people share the same ideas about law, there are surely patterns of the distribution of these ideas and values'.⁴⁷ And it is likely that certain social behaviour will follow them. Some of these patterns are sharper and more interesting than others.

The image of law among the interviewed Polish migrants was quite diversified. Generally, however, people did not have a good experience of law in Poland. Law could be associated

(2009) 23 IANL 148-164 at 159

with something aside from true social relations. One owner of a small business in Poland considered the law in Poland to be too harsh, too complicated, overloaded and inconsistently applied:

'And the Polish institutions, tax offices were chasing only the people who operated legally. It was easier to track them, and, due to the proper documentation, point out that this and that tax has not been paid. They completely did not care about the people from the black market, as of course, they had no way of tracking them in the first place. The officers and inspectors had the right to close your business for any reason. Very often, if they did not receive a tribute from the local businessman, they would openly say: "We will destroy you." It happened to me. If you gave them a bribe you were safe for some time at least. If you did not give them a bribe, then it did not matter whether your business was legal and you had all the regulations in order. They would find something for you anyway' [Interview, No. 4].'

Other migrants, young people who arrived in the UK after working for a couple of years in Poland had no experience of long-term, stable employment and contracts. The employment law in Poland favours the workers but puts high obligations on the employers for paying the national insurance contributions:

'The national insurance contributions were taking approximately 70 per cent of a worker's salary, it was disproportionate to what I actually could pay my workers [Interview, No. 6].'

Therefore most of the people I interviewed were either employed on short-term contracts, or had unwritten agreements with their employers giving them basic or no job security:

'All these jobs I had were either not financially rewarding, e.g. telemarketing -- I was just working for the commission, around 100 Zł per month⁴⁸, or short-term, unstable. I did not have a written contract, but it was more a pyramid type of business -- someone was in charge of a group of telemarketers and paying a percentage of his commission to his workers, there was another person on top of him, etc. We were not signing a short-period agreement with the company, but with the person directly on top of us [Interview, No. 9].'

In the Polish public discourse an instrumental attitude to law prevailed. Although law in general could be considered as a tool to achieve certain social goals and values, in Poland the narrow interpretation of the instrumental quality of law, especially the manipulative character of enacting and using law in a political game, seemed to be dominant.⁴⁹ As Kurczewski observes, in contemporary Polish legal culture most common is the interest to claim 'one's own' right to obtain a certain goal, no matter whether the pursuit of 'one's own' right takes place through legal or illegal means, or in-between.⁵⁰ The 'one's own' rights are evoked to

(2009) 23 IANL 148-164 at 160

justify the achievement of instrumental needs. This behaviour is socially tolerated, as long as similar behaviour of others does not interfere with the fulfillment of one's own aims. In the event of such conflict, the law is treated more as a constraint to a preferred action, rather than shelter or protection. When asked about popular associations with law, the image of the colour red -- *saying: stop, you cannot do this* -- prevailed among the interviewees. Hence, after law's instrumental capacities were exhausted in a given context or situation, the law was very often ignored or pushed further down the scale of importance.

The general climate of the attitude to law can be traced in the socio-legal history of Poland. In medieval and early-modern Poland (1365-1795) the law safeguarded the *status quo* between a traditionally strong nobility, who held an immense role in the legislation, and their elected kings. The monarch did not have the authority, nor the tools to enforce and execute the law. As a result, the anarchy of political life was very often mistaken for the true realization of nobility's freedom.

As different attitudes to law and legality are determined by different historical, political and institutional factors, Polish legal culture is significantly different from its British counterpart. Historically, in Britain, the law was used to protect the rights of the people (nobility) and balance the strong executive authority of the monarch. Hence, according to Bierbrauer, the British legal culture is characterized by the general legitimacy and acceptance of authority, as well as the balance between discretion and particularism in legal decisions.⁵¹ As argued by Galligan, the legal containment of official power in Britain resulted in a bond of trust between governors and the governed -- upon which the principle of the rule of law was based.⁵² In Poland, on the contrary, the monarch was frantically suspected of depriving noblemen of their freedoms and privileges, which paralyzed the government and left the country in the hands of magnates, who ruled in their domains like in 'private states within a state'. This situation led to the partition of Poland (1795-1918) between Russia, Prussia and Austria, which resulted in the development of three different legal culture traditions on Polish territory.

The period of socialism (1945-89) saw the arbitrariness of power due to the absence of the rule of law,⁵³ and the connections based on *do ut des* principle revealed in the studies on mechanisms of corruption.⁵⁴ Rules of the game were changed unpredictably, subject to no formal procedures of consequence. 'Extralegal' administrative measures, invisible sentencing boards, and secret informers took the place of law.⁵⁵ Among ordinary people, it led to the development of informal networks operating contrary to existing 'official law'.⁵⁶ The recent transformation with its extremist politics, volatile economics and bewildering legislation did not inspire much confidence in the rule of law, either.

Although historical experiences can be seen as common to all Polish nationals, I am far from assuming that all Polish migrants will share the same legal culture. Therefore, the experience of working professionals migrating between the two branches of a company or changing jobs might well be very much different from the narratives of migrants who came to the UK as a matter of necessity (e.g. they had been made redundant), took a break from

(2009) 23 IANL 148-164 at 161

school-life, 'looked for opportunities after completing their studies', or escaped from 'lack of a future and debts'.

Upon arrival in the United Kingdom the first priority for most of the migrants was to find a job and be able to support themselves financially. Therefore it was usually the context of the beginnings -- of looking and finding a job -- where the interplay between the legal environment and migrants' legal culture were to be observed.

From the start, migrants' bargaining power was much less in comparison to British employers or employment agencies. The majority of them were therefore willing to accept any of the conditions specified (or not specified) in the verbal or written contracts upon being offered the job. This unequal situation between them and their employer left them with practically only one strategy to follow: 'take the risk, wait and see what happens next'. Not surprisingly the law was moved further down on the scale of importance:

'To be honest, I really needed a job. I was desperate. Have you ever been looking for work here? So you know how it is. I was looking for job from end of May, I found my first stable job mid August. It was via an agency. By this time, your only goal is to have this job, have the money coming in. But to be honest I was lucky, even without the papers, I wasn't cheated on or anything like that [Interview, No. 10].'

They were willing to accept any terms and conditions they were offered, including work which paid 'cash in hand' with no weekly payslips, no taxes deducted, and contracts that did not reflect the real working conditions:

'My first work was through a friend, in a kebab restaurant in K. It was full time, but it was illegal. I was not registered; they did not care about WRS and registration of their workers. I stayed there three months. They also put in my contract, that I was working four days per week, while I was actually working full time. They needed the figures for their bookkeeper. I was working six hours per day, ten hours per day, eight hours. You could not do much in a place like that. You can either accept the conditions or change the job. It was my first job, I did not have much choice. It was bringing money at least. I was paid for eight hours per day, but I had to come half an hour before my work started, then I had to stay at the end of the working day to clean the place. They did not pay more for Sundays or something, it was all one rate [Interview, No. 13].'

'To be honest, I worked there rather illegally. In this job I got paid in cash, at the end of every working week. I realized it only after some time, though. But one had to do something; one had to do something to have money. I also wasn't asked by anybody about the insurance number or Home Office registration. I started thinking about it myself, later on [Interview, No. 4].'

Many of my interviewees very much realized the irregular character of their initial or subsequent jobs. At the same time, they were ready to accept it. The situation was, however, an ambivalent one, and, on the whole, had more to it than only being a matter of survival. My Polish interviewees felt that they were allowed in the UK and had had no problems with clearing Immigration upon arrival. There were also no restrictions in place for them to take up a legal job, as legally they did not require visas or work permits. How the Polish migrants decided to go about the law in the UK was less determined by their immigration status and was more a matter of choice, or more precisely: not making the choice to legalize their stay, of remaining indifferent towards the law -- having in mind the experience of law they brought

(2009) 23 IANL 148-164 at 162

with them from Poland. The association of law with the colour red, very often used to describe the law as a constraint to a preferred action, combined with instrumental, considerations proved to add weight to a migrant's decisions on whether or not to comply with the law. It did not mean that migrants that chose not to comply with the law were ill-natured. Very often, and logically, they made their choices simply to ensure that they themselves benefited more:

'I had a contract of employment in my first job, in a pub. I have read the contract and I knew the terms

and conditions. I also had an unwritten agreement with my boss, that on the contract it was stated that I was working for 20 hours per week, and I was paying taxes for 20 hours per week. Generally, when you work part-time you pay less tax. So I was paying 4 pounds a week of tax and 4 pounds a week for NI, and the rest of my wages I received cash in hand, as I was working full time. This deal paid off to my employer and it was better for me all in all [Interview, No. 19].'

'Apart from my day job, once a week I was working in a pub. I did not have contract, I was paid cash in hand. I asked the landlady there how she was going about it, as -- as far as I knew -- she herself was an accountant. And she told me that she put me in her books as a casual worker. And if I was working as a casual worker, she did not have to pay the tax for me, and I did not need to pay the tax either. If I was to pay emergency tax there, I would have not accepted that job [Interview, No. 21].'

The semi-legal status many Polish migrants find themselves in, while living and working in the United Kingdom, results from the particular legal environment they arrived into -- the 'soft' rules, their enforcement and the specific treatment of the law in the labour sector migrants arrive into, combined with the migrants' legal culture -- the experience of law from Poland. These two factors shape migrants' choice about the status they are ready to accept even against their own interest. What is also interesting to observe is how the status of semi-legality influences the migrants' interpretation of law in the United Kingdom. How do they themselves make sense of their actions, and internalize the concept of law and legality for the purpose of their everyday life?

Legality is gradual

Migrants' legal status impinges on many vital spheres of their existence, and shapes who they are, how they relate to each other and to the law in the host country, their participation in local communities, and their continued relationship with their homelands.⁵⁷ As legal status also affects how migrants interpret the world around them and judge their actions, in the following section I focus on how migrants who share, or at some point in life used to share, a semi-legal status relate themselves to law and legality in their everyday life in the host country.

The fieldwork revealed that legality for many migrants sharing a semi-legal status was extended in time and gradual:

'I came to the UK with the plan that I wanted to stay here for longer, I wanted to settle. It did not matter whether I succeed from the beginning or not, I knew I wanted to stay here, I wanted to earn money for my pension. Therefore I had to make all my papers in order sooner or later [Interview, No. 24].'

(2009) 23 IANL 148-164 at 163

Initially, for the majority of my respondents, it was acceptable to take up employment, without registration and without a National Insurance Number, although they had the knowledge that such documents were required. Gradually, and generally in that order, they first applied for a National Insurance Number, mainly due to the fact that obtaining it resulted in the reduction of the rate of Income Tax (instrumental considerations). The second priority was to negotiate the terms and conditions of a fair(er) contract, or -- if it was not possible (as in majority of cases) -- change the employer. Joining the WRS due to the lack of legal consequences and financial constraints, was usually postponed until it became absolutely necessary or practical (when applying for benefits).

The way the interviewees made sense of how they related their experiences to the concept of legality revealed that semi-legality itself was dynamic and changing, and could be placed on a continuum between the poles of legality and illegality. Someone could be more legal than someone else or less legal than someone else, or perhaps should one say less-semi and more-legal or more-semi and less-legal. Legality seemed to be associated with weekly wages, which were paid regularly either in cash or to the bank account, taxes on the payslips, and payslips themselves. If the employer was cheating with the wages, or was delaying the weekly payments, then the job automatically became illegal in the opinion of the Poles. Receiving a payslip, having the wages paid into a bank account (instead of 'cash in hand'), and having the holidays accrued, of course, would make the job look more legal:

'My manager was employing people in such a way, that there was no contract, no written contract, but you were paid all the hours you worked, everything was legal, you received payslips, you had your tax deducted, NI was deducted, the only difference was that when it says holiday on the payslip, you did not have written how much holiday you've earned, as -- according to him -- all his workers were all part-time and casual and he did not have to pay the holiday, or give paid holiday to his employees. In this respect my next job was *more* legal, as I received both holiday pay and the contract. Now I am working for an institution, and everything has to be there, including the WRS [Interview, No. 26].'

From the account of the interviewees I managed to gather the sequence of importance the certain steps of moving status were placed on the continuum between the legal and illegal. The first necessary step was weekly wages, paid regularly. Receiving regular payslips with the tax deducted, or wages paid into the bank account made the job look more legal. The next step was to have the National Insurance Number -- initially a temporary National Insurance Number, as it helped to lower the amount of tax and national insurance contribution, and later -- the permanent, unique National Insurance Number. Having holiday accrued, and holiday pay calculated on top of the wages, would put one even further along the line. Then came a written contract which might have been very general and short, but was written with terms and conditions stated. The more of these elements one accumulated, the more legal his or her stay and work in the UK was perceived to be. At the very end of the continuum was the WRS. For many of my respondents joining the WRS on the pursuit to legal status was considered optional and dependent on whether one would like to claim benefits in the UK at a later stage, or not.

Gradual legality -- moving status between different stages of semi-legality and eventually legalising their stay -- was therefore, in a majority of the cases, inspired by instrumental needs and attracted by prospective gains (better job security and working conditions, access to benefits and welfare support). However, the gradual character of the process also revealed migrants'

(2009) 23 IANL 148-164 at 164

changing attitude to legality -- legality perceived as a value.⁵⁸ As a consequence, the subsequent stages on the scale of moving status were combined with greater appreciation of legality; migrants gradually assigned a more important role to the law. The law might still have been perceived as quite distant, but more often than not it was associated with the sense of comfort and order. This process reveals the potential scope for future changes and subtle adaptations of legal culture. As summarized in one of the interviews:

'Here [in the UK] it is much more relaxed, people are much more relaxed about the law. Ok, for example there is a street crossing, there are these orange lights, but you can cross the street from one side, you can cross it from the other side of the lights. There won't be a policeman waiting for you around the corner asking you for your ID card. Here you just have some general rules, but you can go around them, or take your own responsibility for yourself, for what you find reasonable or not, then you learn the value of it, and start appreciating it [Interview, No. 8].⁵⁹

To conclude, legality could be discussed at two levels: a behavioural one and at the level of value. At the behavioural level it relates to an objective status of acting in accordance with the law. At the level of value, legality is appreciated as a quality of social life. Nevertheless, it still may incorporate multiple, sometimes contradictory, normative claims, meanings, sources of authority and cultural practices (recognized as legal and legitimate, regardless of who employs them and for what ends).⁶⁰ My research shows that moving on the behavioural scale of legality (even if inspired by instrumental considerations) brings with it more appreciation of legality as a value. As the ways in which people place themselves as legal subjects in turn affects how they relate themselves to the law and legality, through the everyday actions of changing status, people experience a new quality of 'legal' (in the sense of lawful and authorized), which then brings about an internalization and appreciation of the value of legality.

¹ Cecilia Menjivar 'Liminal Legality: Salvadoran and Guatemalan Immigrants' Lives in the United States' (2006) Vol 111, No 4 *American Journal of Sociology* 999-1037.

² Also known as the A8 states: Poland, Latvia, Lithuania, Estonia, Czech Republic, Slovakia, Slovenia, and Hungary.

³ Home Office, Department for Work and Pensions, HM Revenue and Customs, Office of the Deputy Prime Minister (2008) *Accession Monitoring Report, May 2004 -- December 2008* (not available in printed format). Accessed from http://www.ukba.homeoffice.gov.uk/sitecontent/documents/aboutus/reports/accession_monitoring_report/ on 25 March 2009.

⁴ Ibid at p 8.

⁵ See Menjivar, supra note 1 at p 1000.

⁶ Bridget Anderson, Martin Ruhs, Bernhard Rogaly and Sarah Spencer *Fair enough? Central and Eastern European Migrants in the Low-Wage Employment in the UK*, COMPAS Research Report, University of Oxford, 2006.

⁷ Ibid at p 1.

⁸ Martin Ruhs 'Greasing the wheels of the flexible labour market: East European labour immigration in the UK', *Working Paper No. 38*, Centre on Migration, Policy and Society, University of Oxford, 2006.

⁹ See Menjivar, supra note 1, at p 1000.

¹⁰ Ibid.

¹¹ As the concepts: 'semi-legality', 'semi-compliance' and 'liminal legality' identify similar phenomena of retaining the in-between status, remaining at the border between legal/ illegal, for the remainder of this article I continue with the term 'semi-legal'.

¹² Patricia Ewick, Susan Silbey 'The Structure of Legality: The Cultural Conditions of Social Institutions', in Rober Kagan, Martin Krygier, Kenneth Winston (eds) *Legality and Community. On the Intellectual Legacy of Philip Selznick* (Oxford, Rowman and Littlefield Publishers, Inc, 2002) at pp 149-166.

¹³ It would be too easy and too simplistic to assume that the move on the continuum illegality -- legality is only unidirectional. Migrants for various reasons may drop from the WRS or -- in the event of changing job -- not re-register their employment. As a result they return to the semi-legal status. This delays (sometimes indefinitely) the legalization of their work and residence. However the majority of the migrants, generally motivated by instrumental gains, will continue moves toward legality.

¹⁴ See Ewick & Silbey, supra note 12, at p 150.

- 15 Ibid, at p 151.
- 16 Ibid, at p 150.
- 17 Naomi Mezey 'Out of the Ordinary: Law, Power, Culture, and the Commonplace', (2001) Vol 26, No 1 *Law & Social Inquiry* 151.
- 18 See Ewick & Silbey, supra note 12, at p 164.
- 19 Ibid, at p 152.
- 20 See Alejandro Portes, M Zhou 'The new second generation: Segmented assimilation and its variants among post-1965 immigrant youth' (1993) Vol 530 *Annals of the American Academy of Political and Social Science* 74-97; Alejandro Portes, Rubén G Rumbaut, *Immigrant America: A Portrait* (Berkeley: University of California Press, 2006); Reitz, Jeffrey G. *Warmth of the Welcome: The Social Causes of Economic Success for Immigrants in Different Nations and Cities* (Boulder, Colo.: Westview Press, 1998); C Menjivar *Fragmented Ties: Salvadoran Immigrant Networks in America* (Berkeley: University of California Press, 2000); C Menjivar 'Liminal Legality: Salvadoran and Guatemalan Immigrants' Lives in the United States' (2006) Vol 111, No 4 *American Journal of Sociology* 999-1037.
- 21 Kirstyn Inglis 'The Accession Treaty and its Transitional Arrangements: A Twilight Zone for the New Members of the Union' in Christophe Hillion (ed) *EU enlargement: a legal approach* (Oxford, Hart, 2004, 77-110).
- 22 UK Border Agency, Accessed from <http://www.ukba.homeoffice.gov.uk/workingintheuk/wrs/workers> on 21 April 2008.
- 23 European citizens can be deported only on the grounds of a threat to public policy, public security and public health; Nicola Rogers and Rick Scannel *Free movement of Persons in the Enlarged European Union* (London, Sweet and Maxwell, 2005) at p 64.
- 24 Supra note 23, at p 404.
- 25 See UK Border and Immigration Agency, supra note 22.
- 26 Ibid.
- 27 Section 8 made it a criminal offence to employ an individual over the age of 16 who does not have the entitlement to be in the UK or whose status precludes them from undertaking the employment in question (Anderson et al, supra note 6).
- 28 Home Office, *Illegal Working Taskforce Regulatory Impact Assessment from Immigration, Asylum and Nationality Bill* (London: Home Office, 2005).
- 29 Sally Dench, Jennifer Hurstfield, Darcy Hill, Karen Akroyd, 'Employers' use of migrant labour. Summary Report', *Home Office Online Report 03/2006*, accessed from <http://www.homeoffice.gov.uk> on 24 April 2007.
- 30 Ibid.
- 31 Only one of the interviewees was threatened by the employer for registering late with the Worker's Registration Scheme, and the issue of late registration was brought up mainly due to the specific circumstances of this particular case: the employee started a formal grievance procedure against the company for unauthorised deductions from wages.
- 32 See Home Office, supra note 28; Dench et al supra note 29.

- 33 An employment agency (employment business) is a type of agency that employs workers directly but sends them out to work for other businesses on a temporary basis. These agencies offer work placements (assignments) for skilled, semiskilled, and low skilled workers -- warehouse staff for main UK supermarkets (Tesco, Sainsbury, Waitrose, etc), packers, rubbish pickers, factory workers, kitchen staff or cleaners. The job opportunities specifically for women, are however, comparatively limited. They are also mainly recruited as warehouse staff, or factory workers. Among the interviewed women, the most common job offered for women was for a florist, the main supplier of flower bouquets to major UK supermarkets.
- 34 David Winchester, *Temporary agency work in the UK*, UK Response to European Industrial Relations Observatory (EIRO) 2005 questionnaire on the issue, not available in printed format, accessed from: www.eurofound.europa.eu/eiro on 26 April 2008.
- 35 Ibid.
- 36 Trade Union Congress, *Migrant Agency Workers in the UK*, Equality and Employment Rights Department, November 2007; Anderson et al supra note 6.
- 37 See: Roger Cotterell 'Is there a logic in legal transplants?' in David Nelken (ed) *Adapting Legal Cultures* (Oxford, Hart Publishing, 2001) at pp 70-92; James L Gibson and Gregory A Caldeira 'The Legal Cultures of Europe' (1996) Vol 30 No 1 *Law and Society Review* 55-85; H Patrick Glenn 'Legal Cultures and Legal Traditions' in Mark Van Hoecke (ed) *Epistemology and Methodology of Comparative Law* (Oxford, Hart Publishing, 2004).
- 38 Lawrence M Friedman, *The legal system: a social science perspective* (New York: Russell Sage Foundation, 1975) at p 212.
- 39 See Gibson & Caldeira supra note 37.
- 40 See Glenn, supra note 37.
- 41 Roger Cotterrell 'The Concept of Legal Culture' in David Nelken (ed) *Comparing Legal Cultures* (Aldershot, Brookfield USA, Singapore, Sidney, Dartmouth, 1997) at pp 13-31.
- 42 Sally Engle Merry, *Getting Justice and Getting Even. Legal Consciousness among Working-Class Americans* (Berkeley: California University Press, 1990).
- 43 Lawrence M Friedman 'The Concept of Legal Culture: A Reply' in David Nelken (ed.) *Comparing Legal Cultures* (Aldershot, Dartmouth, 1997) at p 33.
- 44 See Friedman supra note 38, at p 15.
- 45 Clifford Geertz, *The interpretations of culture: selected essays* (London, Basic Books, 1975) at p 6.
- 46 Stephen Whitefield "Political Culture and Post-Communism" in Stephen Whitefield (ed) *Political Culture and Post-Communism* (Basingstoke, Palgrave 2005) at p 5.
- 47 See Friedman supra note 43, at p 35.
- 48 Approximately £25 .
- 49 Tomasz Stawecki 'Instrumentalne Traktowanie Prawa -- rozne perspektywy' [Instrumental Approaches to Law -- Different Perspectives] in *Prawo i Lad Spoleczny. Ksiega Jubileuszowa dedykowana Prof. Annie Turskiej* [Law and Social Order. Jubilee Book Dedicated to Prof. Anna Turska.] Warszawa, PWN, at p 39.

- 50 Jacek Kurczewski 'Either Rightly or Like a Crook: Legal Culture of Polish Society after Communism' (2007) Vol 185, No 2 *Sociological Studies* 33-60.
- 51 Guenter Bierbrauer 'Toward an Understanding of Legal Culture: Variations in Individualism and Collectivism between Kurds, Lebanese and Germans', (1994) Vol 28, No 2 *Law and Society Review* 243-264.
- 52 Denis J Galligan, *Law in modern society* (Oxford, Oxford University Press, 2007).
- 53 Martin Krygier 'Law as Tradition' (1986) Vol 5, No 2 *Law and Philosophy* 237-262.
- 54 Andrzej Kojder, *Godnosc i sila prawa*, [Dignity and Power of Law] Warszawa, Oficyna Naukowa, 1995.
- 55 See Krygier, supra note 53.
- 56 Marody, Mirosława 'Antynomie zbiorowej podświadomości' [Antinomies of collective subconsciousness] (1987) Vol 2 *Studia Socjologiczne*.
- 57 See Menjivar, supra note 1, at p 1000.
- 58 There were of course cases when migrants dropped from the WRS and returned to their semi-legal status, however such analysis is beyond the scope of this paper.
- 59 On another note, paradoxically also the low level of law enforcement helped some of the migrants to internalize their choice about the pursuit of legality and appreciate its value better than if *the policeman was waiting around the corner* [Interview, No. 8].
- 60 See Ewick & Silbey, supra note 12, at p 152.