"With your head held high": Italian and Belgian lesbian-parented families' claims and strategies to obtain kinning rights

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Abstract

Lesbian-parented families without legal recognition are subjected to power of the State, which defines who is kin and who is not. This article focuses on the ways in which such families use a range of kinning practices to claim the right for all intentional parents to be considered kin. Our sample includes Italian and Belgian lesbian-headed families with different degrees of legal recognition. Our methodology consists of (i) participant observation of the family life; (ii) in-depth, non-directive biographical interviews and the construction of kinship diagrams; (iii) a socio-historical analysis of the legal context. The study of kinning practices will show how this process of (re) definition contributes to transformation from homoparentality (i.e. when one parent lacks the juridical translation of kinship ties, and exercises parental functions without being recognized as a legal parent) to homoparenting (i.e. when same-sex parents are fully included in the universe of kinship).

Key-words: lesbian-parented families; Belgium; Italy; kinning; reproductive and parenting rights

Introduction[1]

In 2006, Charlène[2] was finally able to adopt her intended children, who had been born in Belgium in 1986 through an ART procedure. In 2008, an Ital-

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1 This article is the result of joint thinking and reflection. A.S. Sarcinelli wrote the sections entitled "How to kin someone who is not your kin" and "Reusing, recycling and reinventing a heteronormative kinship system", and the conclusion. C. Simon wrote the introduction and the sections entitled "An ethnographic critique of the Rainbow Europe Country map" and "Kinning practices in cases of evolving and precarious recognition". We are thankful to C. George for her linguistic revision of the text, to the anonymous reviewers for their helpful suggestions, and to all the families who gave us access to their lives. All citations from texts in other languages have been translated by the authors of the article.

2 In order to protect anonymity and confidentiality, we have modified all personal

ian Youth Court denied a non-statutory mother's[3] request to continue seeing her daughters, after their legal mother (her ex-partner) had stopped allowing her contact with the children. In 2017, Émilie and Marie opted for an ART procedure to enable Émilie to be the legal co-mother from birth, according to a Belgian law. In 2018, an initiative of the municipality of Milan allowed Andrea (aged 9) and Martina's (aged 11) to have their intended mother's name added to their birth certificate.

The juridical recognition of intended mothers is not taken for granted in lesbian-parented families[4]. These anecdotes show the kinning[5] practices used by some families to gain juridical recognition of their kinship ties. Rather than categorizing these families purely by the parents' sex and sexuality,[6] and given that little attention has been paid to the impact of context on same-sex families' trajectories (Ryan-Flood 2005), this article adopts Didier and Éric Fassin's (2006) theoretical background on minorities – defined as a category of people sharing a common experience of discrimination and subjected to a particular power relation. In this case, the minority consists of lesbian-parented households where there is a disconnection between legal kinship, biogenetic kinship, and intentional, practical and everyday kinship (Weber 2005).

It thus refers to what activists (and some researchers) call homoparentality (i.e. when gay and lesbian intended parents exercise parental functions without legal recognition) and to homoparenting (i.e. when lesbian and gay intended parents are fully recognized) (Fulchiron 2012; Fassin 2015). In fact, the minoritization of lesbian-parented households is socially and historically situated, varying across time and space and between countries: it is the State that defines who is kin and who is not. On one hand, heteronormative[7] kinship systems do not legally recognize same-sex-parented families: "acts

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information, replacing it with sociologically equivalent information.

3   The term "non-statutory" emphasises the double handicap of being neither a biogenetical nor a legal parent, despite being an intentional parent (Descoutures 2010).

4   This expression refers to all family configurations where children have been born within a lesbian couple (co-parenting, adoption, use of new reproductive technologies, use of a known or anonymous donor, etc).

5   This term refers to Signe Howell's original concept of kinning, which underpins the theoretical approach of this special issue (Sarcinelli, Guerzoni 2019).

6   Research on this topic began in the U.S., in the field of marginality research (Weston 1991; Lewin 1993; Hayden 1995), and currently focuses on gender (Carrington 1999, Sullivan 2004), intersectionality (Moore 2011), or the relationship between filiation, alliance, gender and kinship (Cadoret 2002).

7   Janik Bastien Charlebois defines "heteronormativity" as "the diffusion of theories that consider heterosexuality the standard mode of sexual development and, as a consequence, see homosexuality as a deficit that requires explanation" (2011, p. 114). Rosa Parisi points out that the principle of heterosextuality orients and hierarchizes kinship relations (2017, p. 22).

that are usually considered a personal right are denied on the basis of a social identity" (Zamperini *et al*. 2016). On the other hand, same-sex-parented families resist and contest this denial of kinship through kinning practices – that is, various juridical, symbolic and social means by which two people become kin. This article focuses on kinning practices occurring within the "entangled kinship spaces" (Sarcinelli *et al*. 2019), including everyday and domestic spaces as well public or administrative spaces.

Our research-question is to what extent kinning and de-kinning practices are framed by the degree of discrimination and the stage of sexual democratization[8]. We speak of the degree of discrimination because the extent and nature of discrimination experienced by lesbian-parented families is not homogenous, but differs according to a series of variables (such as the socio-cultural, political and juridical context, as well as the specific characteristics of the family and its members in terms of gender, sex, social class, nationality, race, age, economic and social capital, and so on). A crucial variable is the stage of the process of sexual democratization of the country where the family lives, which involves, among other things, a shift from homoparentality to homoparenting. Although the socio-juridical and political treatment of same-sex families has an effect on intimate family life, what concrete effects do the institutional treatment of same-sex families have on kinning and de-kinning practices?

Methods and sample

This article focuses on two contrasting systems of juridical recognition of lesbian-parented households: Italy and Belgium[9]. Our sample[10] includes families whose children were born between 1986 and 2017, during a period of crucial changes: in Belgium the recognition of same-sex parents occurred

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8   Éric Fassin describes sexual democratization as an "extension of the democratic domain, leading to an increasing politicisation of questions connected to gender and sexuality" (2006, p. 125).

9   No reliable statistical data is available on both countries. In Italy, the most recent figures come from the 2005 "Modi di" study of 10,000 Italians under 40, conducted by Arcigay (Italy's primary non-profit organization promoting equality between individuals regardless of their sexual orientation or gender identity) in collaboration with the Superior Institute of Health (Arcigay, Modidi, Istituto superiore della sanità 2006). This study showed that 17.7% of gay men and 20.5% of lesbians have at least one child, and around 100,000 children have at least one homosexual parent. A statistical study is currently being conducted by Centro risorse lgbt (http://datacollection.risorselgbti.eu/famiglielgbtqi/). In Belgium, a 2018 national census on family composition placed 5.9% of families in the "other families" category (with no indication of the type of family configurations included in this category).

10   Our sample consisted of 17 families: 10 Italian (from the North-East and Sicily), 5 Belgian (from the regions of Liège and Brussels), and 2 mixed couples (see Appendix A).

between 1990 and 2014, whereas in Italy it started in 2015. Most families in our sample are of middle to high socio-economic status, probably because of the "hierarchies and complex interactions when it comes to access to reproduction and parenting" (Sarcinelli 2018b, p. 103).

The data come from two separate ethnographies of practical, legal and social kinship among same-sex-parented families undertaken between 2016 and 2018[11]. The two ethnographies used common methodology, consisting of: (i) participant observation of familial practices in several kinship spaces (domestic, administrative and public); (ii) in-depth, non-directive biographical interviews; (iii) construction of kinship diagrams with several family members; and (iv) a socio-historical analysis of the legal context. The first study was carried out among Italian and Belgian homosexual and lesbian-parented households, and included: (i) charting public and political debates; (ii) participant observation of the procedures used to acquire legal kinship; (iii) informal conversations with children supported by tools suggested by the children themselves (drawings, maps, etc.); (iv) interviews with activists, institutional actors and family members; and (v) press analysis. The second study was conducted with lesbian-parented families living in Wallonia (Belgium), and used participant observation with a final non-directive collective interview with both mothers and children, or non-directive interviews with open questions with both mothers and, when possible, with the children[12].

An ethnographic critique of the Rainbow Europe Country map

The International Lesbian and Gay Association (Europe)[13] classes Belgium and Italy at the top and bottom respectively of the Rainbow Europe Coun-

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11   Both studies were undertaken through the Laboratoire d'Anthropologie Sociale et Culturelle (University of Liège). The first is an ongoing research project entitled "The social, moral and political boundaries of kinship. An anthropology of children of homosexual and lesbian couples in Italy and Belgium" (see Sarcinelli 2018a, 2018b), funded by a FRS-FNRS post-doctoral grant and sitting within the Origines research programme, "At the edges of kinship: origins and new familial configurations (2018-2021)", National Research Agency, Centre Norbert Elias, France, https://www.anr-origines.fr/. The other is a master's thesis entitled "Having two mothers: Making kinship" (Simon 2018) and conducted under the direction of Alice Sophie Sarcinelli. Ethnographies on this topic are very recent in Italy (Grilli 2014; Guerzoni 2018; Parisi 2018), whereas in Belgium previous sociological and anthropological studies have not adopted an ethnographic approach (Herbrand 2006, 2012, 2014, Roca i Escoda, Gallus 2012).

12   The interviews focused on the following issues: family background; the context in which this family was started and subsequently evolved; the role of activist contexts and associations; ways of being a family in everyday life; reproductive pathways, birth and the early years of the children's lives.

13   ILGA uses 69 criteria to evaluate the current status of laws, policies and practi-

try Map and Index 2019. Belgium received an overall score of 73%, with 99% on family rights, and was ranked second out of 49 countries. Italy, meanwhile, got a total score of 22% and was ranked number 34. We can subject this polarization to ethnographic critique (Roux 2011) through an anthropological approach to legal kinship.

Although the "velvet legal revolution in Belgium" transformed this small country into "one of the world front-runners in the extensions of legal rights to LGB people" (Borghs, Eeckhout 2010, p. 1), scholars question whether this country is really a "paradise for LGBT rights" (Eeckhout, Paternotte 2011), especially for gay men (de Briey, Pitseys 2007; Sosson 2017). Indeed, Belgium legally recognized cohabitation for same-sex couples in the 1990s, and in the 2000s several Civil Code amendments and new laws ensured greater equality between heterosexual and homosexual couples. The law of 6 July 2007 opened up ART to lesbian women, but only conferred a legal status on the birth mother. Following the modification of certain articles of the Civil Code in 2014, the other intended mother is now automatically recognized as the child's parent with the status of co-mother.

In Italy, until recently there was no recognition of reproductive and family rights for lesbian couples. Today, law no. 20/5/16 makes civil unions open to same-sex couples, but most reproductive rights are still denied (i.e. in vitro fertilization with a donor, adoption by same-sex couples, step-child adoption by the intentional parent within a same-sex couple, surrogacy and access to ARTs), as well as family rights (many kinship ties have no legal recognition[14] and the birth mother is considered a single mother to all intents and purposes). Nevertheless, there is some room for manoeuvre at regional and local levels for the recognition of kinship ties, both through tribunals and through municipalities. A prominent example was the Supreme Court's first authorization of co-parent adoption in 2016, and recently some municipalities have allowed co-parents to be named on birth certificates.

As this shows, it is not as straightforward as comparing Belgian and

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ces affecting LGBTI people in Europe. The thematic criteria relating to family status are marriage equality, registered partnership, recognized cohabitation, no constitutional limitation on marriage, joint adoption, second-parent adoption, automatic co-parent recognition, medically assisted insemination (for couples and singles) and the right for trans people to marry a person of another gender. See Europe Rainbow Map May 2019 https://www.ilga-europe.org/sites/default/files/Attachments/rainbowmap2019online_0_0.pdf last accessed 23/08/19) and Europe Rainbow Map (index) May 2019 (https://www.ilga-europe.org/sites/default/files/Attachments/rainbowindex2019online_0_0.pdf last accessed 23/08/19). For an analysis of activism within ILGA, see Ayoub, Paternotte (2012).

14   Filiation is not transmitted on both sides: intended parents and their genealogical lines are not legally recognized. Moreover, the kinship between siblings of a lesbian-parented family with the same sperm donor and different birth mothers is not recognised; nor is the link between genealogical line of the adopting parent and the adopted child, where a partner's biological child is adopted on the basis of adoption in special cases.

Italian families as if one country was characterized by a total recognition of same-sex-parented families, and the other by a total lack of recognition. Our findings show different degrees of juridical recognition of kinship ties, attesting the variety of situations between homoparentality and homoparenting: *high non-recognition, high or full recognition, evolving recognition, paradoxical recognition* and *precarious recognition* (see Appendix A). In cases of *high non-recognition*, the intended mother does not have any rights regarding her children, whereas in the case of *high or full recognition* both mothers are juridically recognized from the point of the child's conception. These extreme cases are the least frequent, and correspond respectively to the families with the oldest Italian children and the youngest Belgian children in our sample. Most households fall into the two intermediate levels: *evolving recognition* (when families with little or no recognition obtain recognition over the years) or *paradoxical recognition* (where families are recognized by some institutions or States, and not by others). Finally, families facing *precarious recognition* can lose their juridical recognition, for example during migrations. The Italian Consulate in South Africa did not register the adoption certificate of Laura, who adopted two children in South Africa with her wife. Despite their Italian mother, the two children needed a residency permit when they moved to Belgium. Meanwhile, Véronique, a Belgian national and co-mother of Milù, is "nobody" in relation to her child in Italy, where she migrated. We can also observe *precarious recognition* in the case of the Italian families who have obtained new birth certificates including both mothers' names from the town hall: in spring 2019 - one year after this recognition by the municipality - the police started asking the families to present all the documentation concerning the intended mother's official status during the ART process. After these controls, any intended mothers whose documentation was not correct ran the risk of being legally de-kinned, losing the status of mother they had acquired one year earlier. The degree of juridical recognition will enable us to better understand practices of kinning and de-kinning.

How to kin someone who is not your kin

The political and juridical recognition of homosexual-parented households is presented as a top priority for Rainbow Families movements all over the world. However, our findings show that the degree of legal recognition does not drastically alter the possibility of exercising parental duties on a day-to-day basis. Even in cases of high non-recognition, social kinning takes precedence over legal kinning in the exercise of everyday kinship. Despite its symbolic and political importance, juridical recognition might have a legal relevance in some specific cases, especially in presence of a potential de-kin-

ning situation (such as migration, the break-up of the couple, a serious disease or the death of the statutory mother), and can ultimately result in a child being deprived of one parent. Moreover, any civil servant can decide to ignore intended kinning: it is the State – personified by its servants, such as doctors, teachers or civil servants – that has the power to decide who is kin and who is not.

Therefore, many families without legal recognition fear that things will go wrong, and non-statutory mothers do not feel at ease in some institutional contexts. Others, on the contrary, simply act as mothers in their interactions with institutions, even when they are not juridically authorized to do so. The degree of fear might vary according to the individuals and the situation, including the family's economic, social and territorial capital, or the degree of hostility in the context (Sarcinelli 2018a).

When couples suffer from low levels of legal recognition, they actively employ strategies to symbolically, socially and juridically kin their children. Legal kinning is any form of juridical recognition of their kinship ties by local, national or international institutions, through any kind of papers or other means of confirming the relationship between the non-statutory parent and the child. This "work of legal technique" comprises formal acts, everyday practices and representations which, together, form a recognized and objective social category (Grilli 2014, p. 37 and p. 25). These procedures are often supervised by associations and NGOs such as Famiglie Arcobaleno and Rete Landford for Italy, or Homoparentalité and Parents-Arc-en-Ciel in Belgium. Alongside legal kinning, the "never-kinning" (Edwards 2014, pp. 52-53) of third parties in reproduction, by separating the origins from the originators (Nordqvist 2012), is a further strategy to facilitate the kinning of the intended mother, given the weight of the principle of exclusivity in the European kinship system.

Couples with higher cultural, social and economic capital or other resources (Corbisiero 2017) find more solid and sophisticated kinning strategies (Sarcinelli 2018b). In Italy, the first and easiest step is to request "family status", a document for cohabiting people with the same residence. Further steps (in contemporary Italy, and in Belgium before 2014) included mothers becoming the lifetime guardian of their partner's child[15], families adding the non-statutory mother's name to the child's identity card and passport, or making a notary deed. Finally, learning from the experiences of the few families who have managed to obtain adoption in special circumstances, many Italian couples gather in a box all possible forms of proof (pictures, letters, certificates, and so on), to be used to request adoption once the

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15   Thanks to this status, the co-parent is the guardian of the child not only in the event of the legal parent's death, but also when the birth parent is still alive in case of distance, incapacity or other hindrance.

children are older and to increase the social sense of parenting: they are used to "find meaning and legitimacy in their motherhood", and to anchor "their stories and build new parental roles, compensating for the absence of formal political recognition" (Zamperini 2016, p. 104). Of course, the procedure for adoption requires further economic capital, as well as the capacity to demonstrate the objective and subjective characteristics (Coutant 2001) necessary to be considered parents by the court. It is thus necessary to illustrate symbolic and social kinning strategies.

Reusing, recycling and reinventing a heteronormative kinship repertoire

Since the European kinship system does not include same-sex-parented families, couples often display great creativity in strategically appropriating and employing the symbolic register of this heteronormative repertoire – namely weddings, baptisms, and the transmission of filiation through name and goods. First, some couples play on representations of biogenetic ties: for example, they may make the deliberate choice to each carry a child, and/or to implant the ova of one mother into the other mother's womb, and/or to each use sperm from the same donor or to use a donor phenotypically similar to the intended mother (Hayden 1995). These procreative strategies create biogenetic or somatic ties between the family members.

Secondly, couples also use an older form of kinship, which in the past was central to Western European kinning alongside "biological" and legal kinship: "baptismal kinship" (Fine 1994). By becoming the child's godmother, non-statutory mothers acquire a place in the realm of kinship. In the case of a Catholic couple living in a reasonably large, bourgeois, conservative town in Northern Italy, the baptism of their daughter offered an alternative way to introduce the intended mother to the in-laws – as godmother.

Thirdly, to respect the Euro-American principle that filiation is governed by transmission (of inheritance and of a name), many non-statutory parents use their wills to transmit inheritance to their children, and/or make creative choices about their children's first name and surname to highlight the filiation between the children and the non-statutory parent (Almack 2005; Courduriès 2017). For example, Charline, a child of the first generation of Belgian families of the sample, has a name which recalls her non-statutory mother's name, Charlène. Meanwhile, Silvia Rossi and Celeste Ferrari – a family with a high level of non-recognition – use "Celeste" as a second name to both their children, Mattia and Matilde; each child thus has their own given name, their non-statutory mother's first name as a middle name, and their statutory mother's surname. By contrast, Belgian families who were recognized from birth (or before) do not need to make these strategic choic-

es in transmitting family names: they reported that they considered only practical implications (for example, some choose to give their children child the birth mother's surname because it is easier to pronounce and spell).

In the same way, "appellatives" – meaning all terms and expressions used to mention a person in discourse, regardless of their utterance position (Perret 1970) – provide an additional means of stating who is kin and who is not (Gross 2007). Since there are no terms of reference or address for families with two mothers in the European kinship system (Cadoret 2001), couples need to reinvent them. Some Italian families use the term mother followed by the name of each mother, or use the term mother without differentiation to indicate any one of the two mothers. This reinforces social kinning and serves to claim the right to be considered kin.

The use of terms other than "mother" can have different significations. Belgian co-mothers – who do not need to affirm their role – use mother-sounding names such as "mima" or "mamou", or individual nicknames (e.g. Pascaline is called Paka by her children). By contrast, some Italian non-statutory mothers avoid using the term "mother" because they do not still feel confident enough: Costanza – who had great difficulties coming out as a lesbian mother – used the term "manna" instead of "mamma" when the social and symbolic kinning was still in its early days. Children play a crucial role in the use of appellatives: Laura, a Sicilian girl, called her non-statutory mother "father" for a while and in other situations mim, whereas Kelly in certain situations calls her two mothers "mum" without distinction. Finally, the use of appellatives acquires a crucial role where de-kinning occurs. When Alessandra de-kinned Consuelo after they split up (meaning that she ceased her kinning relationship to their children, who stopped having any contact with her), she obliged her children to stop calling Consuelo "mum", and asked her ex-partner to correct their children when they called her mum (for further analysis of this case, see Sarcinelli 2018a).

To summarise, the various forms of symbolic and social kinning presented above play different roles depending on the family situation and the degree of recognition. First of all, they allow intended mothers to be recognized as mothers both by the nuclear and extended family, and by external observers of the family (e.g. friends and colleagues): this is particularly crucial for non-statutory mothers, but it can also be important for some Belgian co-mothers living in particularly conservative settings. Secondly, they facilitate the recognition of non-statutory mothers' parental rights. These rights are claimed at two levels: during everyday life (e.g. the non-statutory mother's right to collect her children from nursery or school) and at a more collective and activist level (e.g. the recognition of same-sex-parented families and the resulting rights at the juridical level). To do so, families simultaneously claim their configuration as a desirable difference, and try to normalize such difference by showing that they are families just like any

other. They put efforts in appearing to conform (Côté 2009) to the "moral economy of kinship" (Sarcinelli 2018a) and parenting:

> Homoparental families insist strongly on their "normality", on their parental competence: being "good" parents becomes the more evident sign of their normality. This normality is often transformed into a burden and a trap, as they affirm themselves; on one hand it enables them to lay claim to their neglected rights and full citizenship, and to obtain visibility in civil society; on the other hand it submits them to an incessant control, an incessant inspection of their normality" (Parisi 2017, pp. 21-22).

The logic beyond all these strategies is not specific to lesbian-parented families, but is shared by many other stigmatized and minoritized families with very radically contrasting situations (e.g. Roma families in Sarcinelli 2015): the minority's strategies are based on the capacity to use the symbolic register of the other, which, in this case, is the heteronormative kinship system. But what happens when the legal kinship system is no longer heteronormative? Do kinning strategies change as legal recognition evolves?

Kinning practices in times of evolving recognition

In these times of sexual democratisation, kinship repertoires are becoming less heteronormative, leading to the legal kinning of intended mothers. Nevertheless, this legal recognition is often unstable, or it is limited to one or few countries. This instability has a strong impact on the kinning practices of lesbian-parented families.

When a family obtains legal recognition, their kinning practices evolve according to their perception of how stable the recognition is. The few Italian families who recently obtained legal kinning through a municipal procedure felt a sense of relief following this unexpected solution; but many of them perceived this measure as *precarious kinning*. In fact, most of them continued to adopt strategies to reinforce their kinning. Those who had already filed an adoption request with the Tribunal selected different strategies according to their lawyers' advice: some withdrew their adoption request in order not to draw attention to their case; others decided to wait, hoping that a positive verdict could reinforce their situation. By contrast, the few Italian families who managed to adopt their partner's child on the basis of adoption in special cases are more certain that their recognition is stable, but it is more limited[16].

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16   Law No. 184/1983 has been applied to a few lesbian families on the principle of the child's best interest. Although the child thereby acquires a juridical kinship tie with the co-mother, the child does not enter her genealogical line as full kin.

Meanwhile, Belgian families who have experienced a legal kinning feel more protected in case of unpredictable events (death, illness, or separation), even if not much has changed in their everyday practices. However, we could observe contrasting reactions among families facing administrative dysfunction. In some cases, the co-mother was not registered on the child's identity card: in this situation, co-mothers who were legally recognized before birth (during the ART procedure) did not see this as particularly important, whereas those who had had to adopt the child after birth lamented the officers' incompetence. Fully-recognized Belgian co-mothers do not feel any different from heterosexual households: Émilie (co-mother) reported acting "like a father" when dealing with civil servants. This is not the case for the mothers who had to go through a procedure before gaining the status of co-mother.

Regardless of the real or perceived precariousness of the recognition, families experience a period of adaptation to their new status before feeling that they are fully recognized as kin. Families collect material proof of their new kinning situations (family record books or revised birth certificates) and some co-mothers carry it with them, as if they could lose this right or need to prove it. Laura, an Italian intended mother, expressed it as follows: "The time the child is growing up gives you the time to adapt to the idea that 'we are two mothers' and you have to always say it with your head held high, with your head held high, with your head held high. Perhaps the first time I said, 'We are two mothers', my voice was not as firm, relaxed and calm as it is today. But little by little, you get used to it". In a recent conversation after she got the new birth certificate, Laura affirmed that her head was held even higher – although she was carrying the certificate with her. Her contradictory behaviours show that kinning practices change only partially, given that the heteronormative kinship system takes time to shift.

Conclusions

Some French scholars have tried to understand whether same-sex-parented families can be considered an anthropological break in the realm of kinship. According to Anne Cadoret (2001), the very fact of having same-sex parents is an anthropological break, while according to Agnès Fine (2001) it is the practice of pluriparenting (in both heterosexual- and homosexual-parented households) which breaks with the Euro-American principle of exclusivity. Given that Euro-American kinship systems evolve and have internal variation (through both time and space), heteronormativity and pluriparenting may both constitute a break in kinship in and of themselves, according to the historical, juridical and social context and, more precisely, its degree of sexual democratization. In fact, without sexual democratization, intended kinship

ties are disconnected from the two symbolical orders of Euro-American kinship – namely, the order of nature and that of law (Schneider 1968; Salazar 2005), which are both heteronormative and based on the principle of exclusivity. The higher the degree of juridical and social recognition of a given family, the less their configuration constitute a break. The anthropological break is not theoretical and disconnected from reality, but is embedded in it and varies according to generation and anthropological socio-political space.

In contrast to the idea that lesbian-parented families need to build a new social script to talk about their experiences (Zamperini *et al.* 2016), our findings show that their kinning practices simultaneously innovate and build on continuity (Grilli, Parisi 2017; Parisi 2017). Lesbian-parented families reuse and recycle the kinning practices of the Euro-American kinship system, in order to reinvent this same system. This might be understood as a "familist assimilationism" employed by subordinated family groups by adopting and conforming to the dominant models of family and marriage, as dictated by heteronormativity (Rios, Oliveira 2012 in Tarnovski 2019). However, on the contrary, we argue that such practices are tactics adopted by a minority in order to propose new family configurations without breaking with their past. Following Parisi (2017), lesbian-parented families' kinning processes are acts of "intimate citizenship", creating new symbolic orders of parenting and of filiation built upon the existing order. Such acts clearly show the entanglement between the intimate and public spaces of kinship at the boundary between the family and the State: "Political philosophy has long known it, but we have forgotten it in the fire of contemporary controversies: the very definition of modern society lies between the family and the nation" (Fassin 2009, p. 381). By focusing on these entanglements and on lesbians' relationship to the State(s) which marginalize(d) them, we can learn much about the State, how it understands itself, and how it seeks to reproduce itself:

> Attempting to comprehend the heart of the state while studying marginalized populations (...) might seem like a contradiction. Yet what we argue precisely the opposite; namely, that it is in its margins – comprised at once of populations, territories, and policies – that the contemporary state can best be captured" (Fassin *et. al.* 2015, p. 3).

In the case of sexual democratisation, this process is not only a matter of legislative decisions as the Rainbow map suggests, but also involves outside observers of the family, internal actors, civil servants, and State agents of public agencies.

Annexe A

Birth Mother (BM), Intended mother (IM) and country	Degree of recognition	Reproductive arrangement	Legal kinning	Symbolic/social kinning	Dekinning (if any)
BM: Dominique, IM: Charlène (BE)	Evolving recognition: high non-recognition → low recognition	1986: ART (anonymous donor) (twins)	At birth: statements with a notary giving to IM rights over the children 2006: simple adoption by IM (children over 18)	The daughter's name recalls the IM's name. IM's appellatives have maternal echoes	Children obliged to call BM's parents by their first names, while other grandchildren used grandma and grandpa
BM: Fabienne, IM: Pascaline (BE)	Evolving recognition: high non-recognition → high recognition (not full)	1996 and 2001: ART (same anonymous donor)	2014: IM obtained the status of co-mother, but children retain BM's surname only	IM is called by a nickname by the sons	/
1st child: BM: Jeanne, IM: Sylvie 2nd child: BM: Sylvie, IM: Jeanne (BE)	1st child: evolving recognition: low recognition → high recognition; 2nd child: high recognition	2010 and 2016: ART (same anonymous donor)	2010: adoption by IM 2014: both IM benefited from the law on co-maternity	BM is called maman, IM is called mama (the equivalent of mum in Netherlands – the family is bilingual) The children have the same surname: Jeanne's surname followed by Sylvie's surname	/
BM: Marie, IM: Émilie (BE)	high recognition	2015-2016: ART (anonymous donor)	At birth: IM benefited from the law on co-maternity	The child's second name is inspired by IM's name IM is called Mamou	/

Birth Mother (BM), Intended mother (IM) and country	Degree of recognition	Reproductive arrangement	Legal kinning	Symbolic/social kinning	Dekinning (if any)
BM: Florine, IM: Laurence (BE)	High recognition	2015-2016: ART (anonymous donor)	At birth: IM benefited from the law of co-maternity	IM's appellative has maternal echoes	/
1st child: BM: Chiara, IM: Valentina 2nd child: BM: Valentina, IM: Chiara (IT)	Evolving but paradoxical recognition: low recognition → high but precarious recognition	2005 and 2007: ART in Denmark (same anonymous donor)	2006-2007: IM became the children's lifetime guardian and her name was added to the children's ID and passports 2017: Request for an adoption on "special basis" (ongoing) 2018: Municipality gave new birth certificate for each child indicating IM	IM used the official status of "lifetime guardian" to assert the co-mother's right to vote in their children's school elections	IM's mother refused to visit her after birth, considering it was the place of BM's mother. When the couple separated, each grandmother agreed that each child should live with their respective BM
BM: Consuelo, IM: Alessandra (IT)	high non-recognition	1999 and 2001: Self-insemination with no sexual intercourse (donor is a friend of the couple)	/	IM's name (Alessandra) used as a second name for both their children, so that both children have their own name, IM's name, and BM's surname	At birth, BM's mother gave two big golden hearts to BM and the donor, and two smaller hearts to IM and the child. After the couple split up, BM prohibited IM from seeing the children. The court didn't recognize a need for the children to re-establish a relationship with IM

Birth Mother (BM), Intended mother (IM) and country	Degree of recognition	Reproductive arrangement	Legal kinning	Symbolic/social kinning	Dekinning (if any)
BM: Veronica (IT), IM: Véronique (BE). They migrated from BE to IT	Paradoxical recognition : high recognition BUT not full in Belgium → non-recognition in Italy	2012: ART in Denmark (open donor)	2013: Adoption of the child by IM (in BE)	/	Since the adoption is not recognized in Italy, IM has the status of co-mother in BE, but is a stranger to the child in IT
BM: Luciana, IM: Laura (IT)	Evolving recognition: low recognition → high recognition	2013: ART in BE (anonymous donor)	At birth: notarized contract attesting the rights and obligations of IM towards the child. 2018: Request for adoption. Meanwhile, the Mayor recognizes the IM and changes the birth certificate	Social Kinning: the extended family gave IM the social status of father and the child calls IM "daddy", even though BM and IM introduced themselves as "mother Laura" and "mother Luciana"	/
BM: Valeria, IM: Assunta (IT)	Evolving recognition: Low recognition → high recognition (waiting for the Court's decision about the request for adoption)	2013: Self-insemination with no intercourse (donor was a good friend of her family)	2016: Civil Union 2017: Request for adoption by IM	IM has the status of god-mother	/
IM: Laura (IT) IM: Ann (South African) living in BE	Paradoxical recognition: Adoption of children not recognized by the Italian consulate in South Africa and not valid in the European Union	2005: Joint adoption of two children in South Africa	No possibility to request adoption in BE because neither of the mothers is a Belgian citizen	The couple is bilingual and uses the appellatives "Mamma" and "mum"	South Africa considers the children to have an Italian mother, and the EU considers them to be non-EU citizens

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