

CHAPTER 11

COMPARING CITIZENSHIP
REGIMES

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DEFINING AND INVESTIGATING
CITIZENSHIP REGIMES

CITIZENSHIP is a form of ‘legalized discrimination,’¹ in the sense that polities make categorical distinctions in their laws on the basis of defined membership criteria with regard to allocation of benefits and rights. These distinctions are justified because citizenship is viewed as a constitutive element of political community: without a stable membership conception of the group of persons that is entitled to the benefits and rights of a community, political self-determination is generally held to

¹ Andreas Wimmer, *Ethnic Boundary Making: Institutions, Power, Networks* (New York: Oxford University Press, 2013), p. 74.

be impossible. Territory, an equally vital constituent element of statehood, has been divided between states as a result of warfare, international treaties, and arbitration in such a way that all permanently inhabited territories are ruled by one state and one state only. For people, the international convention is that states are sovereign in determining their own population, which entails that they can, within certain limits set by international law, exclude populations inside their territory or include others beyond their borders. As a result there is significant variation between political communities both with regard to the access to status as well as the extent to which it discriminates in terms of rights and duties.

This chapter discusses comparative research on the regulation of the acquisition and loss of citizenship status and of the implications of having this status or not, which broadly speaking can be designated as the research agenda of the comparative study of citizenship regimes. *Citizenship regimes* are understood here as institutionalized systems of formal and informal norms that define access to membership, as well as rights and duties associated with membership, within a polity. *Comparing* citizenship regimes thus implies the study of how political membership is regulated in different contexts, by states, as well as in sub-state and supra-state communities. The compelling reason for analyzing citizenship regimes across contexts is that what is normal in a particular time or place may not always have been so, or is different elsewhere.² Given that citizenship is so intimately linked to self-determination of communities, the regulation of political membership tends to vary significantly across time and place, while our understanding of the causes and consequences of such variation is influenced by ‘self-imposed national blinders.’³ Through comparison, when based on well-chosen case selection strategies, we can strip away such national blinders and learn not just about citizenship regimes in other contexts, but also better understand how political membership is governed within our own community.

Three further clarifications are needed, however, in terms the scope of the body of literature discussed in this chapter: citizenship regimes are defined 1) both by membership and rights; 2) by the nexus between these; and 3) by formal and informal norms.

First, as membership can be defined both by membership criteria and by the way in which membership discriminates in relevant areas of life, to understand citizenship regimes we need to look both at access to the status (and the loss of it) as well as the content of the status. In Bauböck’s terminology, citizenship has both a nominal and a substantive side and to capture citizenship dynamics comprehensively, we

² Irene Bloemraad, ‘The Promise and Pitfalls of Comparative Research Design in the Study of Migration,’ *Migration Studies* 1, no. 1 (2013): pp. 27–46, p. 29.

³ David FitzGerald, ‘A Comparativist Manifesto for International Migration Studies,’ *Ethnic and Racial Studies* 35, no. 10 (2012): pp. 1725–1740, p. 1726.

cannot focus solely on one of these.⁴ After all, if citizenship did not provide any exclusive rights and benefits, having the status would be meaningless; conversely, if anyone can get the status, linking entitlements to citizenship would amount to little. Citizenship regimes thus include institutionalized norms both with regard to membership status as well as norms with regard to rights and duties associated with the status.

Second, it is important not only to look at both status and rights, but also at the nexus between them, as status and rights often go together, but not necessarily so. On the one hand, we can observe practices of membership without rights, such as restrictions of political rights for prisoners or for non-resident citizens. On the other hand, the extension of rights previously associated exclusively with citizenship, such as the franchise, to resident non-citizens, is seen as hollowing out or devaluing the institution of citizenship.⁵ Political rights are a prime example, though by no means an exclusive one, of how the decoupling of rights and benefits from the status of citizenship invites a critical reflection on the relevance of the status itself. Comparative debate focuses both on the empirical extent of this decoupling and on the variation across government levels.⁶

Third, when analyzing citizenship regimes, especially comparatively, we need to look beyond formal norms (as defined in constitutions, laws, and jurisprudence) and also take into account how informal norms influence practice and thus the access to and meaning of citizenship. How administrations implement naturalization laws matters significantly for the extent to which immigrants are encouraged to acquire citizenship. In terms of substantive equality, formally, citizenship is a mainstreaming device. Yet in practice it may not be able to rule out discriminatory practices in the labor market. Hence it is important to recognize that formal membership rules may reflect the outcome of political contestation, yet contestation does not stop with the establishment of such rules.

In the remainder of this chapter, the focus will be on how the state of the art developed with regard to its key research questions. This discussion will follow the comparative literature on citizenship regimes, which is, broadly speaking, organized around three sets of research questions where citizenship regimes are approached, respectively, as typologies; dependent variable; and independent variable. The first question is descriptive (along which dimensions can citizenship regimes be differentiated?), the latter questions are explanatory (focusing on explaining, respectively, which factors structure variation in citizenship regimes and how citizenship

⁴ Rainer Bauböck, *Transnational Citizenship: Membership and Rights in International Migration* (Aldershot: Edward Elgar, 1994).

⁵ Peter H. Schuck, 'Membership in the Liberal Polity: The Devaluation of American Citizenship,' *Georgetown Immigration Law Journal* 3 (1989): pp. 1–18; Yasemin N. Soysal, *Limits of Citizenship: Migrants and Postnational Membership in Europe* (Chicago: University of Chicago Press, 1994).

⁶ Jean-Thomas Arrighi and Rainer Bauböck, 'A Multilevel Puzzle: Migrants' Voting Rights in National and Local Elections,' *European Journal of Political Research* (forthcoming).

regimes impact on social, economic, and political outcomes). While these questions partly drive separate research agendas, they are better viewed as part of an integrated agenda where each of these questions provides necessary steps towards a comprehensive understanding of the dynamics of citizenship regimes. The concluding section reflects on such an integrated comparative research agenda and discusses theoretical and methodological challenges faced by scholars analyzing these questions.

TYPOLOGIES OF CITIZENSHIP REGIMES

Much of the comparative literature on citizenship regimes is focused on classification: what are the similarities and differences between the way in which formal and informal norms define access to membership within polities, as well as rights and duties associated with membership? In other words, along which dimensions can citizenship regimes be differentiated?

While this is in essence a descriptive exercise, the relevance of classification can hardly be exaggerated as comparative research revolves by definition around the systematic analysis of similarities and differences. Before we can answer relevant *why* and *how* questions, we first need to tackle *what* questions. Without a good sense of what variation is out there, in terms of patterns and trends, we cannot start to formulate relevant explanatory questions. The existing literature in this field attests that the deceptively straightforward ‘what’ question is by no means one that can be answered uncontested, especially when detecting *systematic* variation between citizenship regimes. This complexity derives from the sheer variation between regimes, both with regard to membership criteria determining access to citizenship (or ‘nationality’ as it is mostly termed in international law) as well as the rights attached to citizenship.

For access to citizenship, we can distinguish, on the one hand, between ascriptive membership conceptions, mostly applicable through the acquisition of citizenship at birth, and voluntary membership conceptions, which imply a degree of openness in terms of individual choice, both regarding acquisition (e.g. through ordinary naturalization) as well the loss of citizenship (e.g. through voluntary renunciation of the status). At birth, well-known distinctions exist between communities prioritizing descent from a citizen (*jus sanguinis*) or those where birth at the territory is given greater significance (*jus soli*). In practice, these principles are not mutually exclusive and most states apply a mixture of both. For example, most states in Europe prioritize descent-based transmission of citizenship but use territorial

access to citizenship to prevent what is generally accepted as an undesirable phenomenon of statelessness, as in the case of newborns found on the territory of a state whose descent cannot be established (foundlings).⁷ Other states prioritize territorial access to citizenship, as in the case of the United States and most states of the Americas, but simultaneously maintain rules allowing citizens residing outside the territory of the state—under varying restrictions—to transmit citizenship to their offspring.

In addition to regulations determining citizenship at birth, states also maintain a variety of rules regarding the acquisition of citizenship after birth, such as by ordinary naturalization or by facilitated naturalization for spouses of citizens or persons with cultural affinity to the political community. Moreover, not only the rules on the *acquisition* of citizenship vary between states, so do the rules on the *loss* of citizenship. For example, political attitudes towards dual citizenship have traditionally been negative and restrictive: most states had rules that implied the automatic loss of citizenship—or a discretionary power for the administration to revoke citizenship—as a consequence of the voluntary acquisition of another citizenship. Nowadays, however, such restrictive dual citizenship regulations have been abolished in the majority of states.⁸

Besides the acquisition and loss of the status of citizenship, political communities vary greatly in terms of the consequences of possessing this status. For example, franchise is traditionally tied up with citizenship, reflecting the importance of political emancipation, differentiating between those who are just subject to authoritative rules, on the one hand, and those who have a say in determining these rules.⁹ From the perspective that citizenship ‘is also an invitation to participate in a system of mutual governance,’¹⁰ political rights are thus more closely linked to citizenship status than either civil or social rights. In terms of duties traditionally associated with citizenship, these are today either no longer universally imposed on all citizens (e.g. conscription) or universally imposed on residents rather than citizens (e.g. duty to obey the law, pay taxes etc.) and thus not closely linked to citizenship status.

Typological approaches aimed at capturing this variation between regimes in a systematic manner can be differentiated both by the scope of the dimensions along which regime types vary, as well as by the purposes of each approach in terms of its heuristic strengths and weaknesses. In the following, three sets of debates over citizenship regime typologies are presented, with a focus on the scope of regime typologies and their purpose.

⁷ Maarten Peter Vink and G.R. De Groot, ‘Citizenship Attribution across Western Europe: International Framework and Domestic Trends,’ *Journal of Ethnic and Migration Studies* 36, no. 5 (2010): pp. 713–734.

⁸ See Spiro in this volume. ⁹ See Shaw in this volume.

¹⁰ Irene Bloemraad, *Becoming a Citizen: Incorporating Immigrants and Refugees in the United States and Canada* (Berkeley: University of California Press, 2006), p. 1.

One-dimensional versus multi-dimensional. Given that citizenship is by definition an institution of social closure,¹¹ it comes as little surprise that most typological exercises in this field revolve around the relative openness/inclusiveness or closure/exclusiveness of regimes. Citizenship regimes are thus typically seen as ‘closed’ or ‘exclusive’ when the scope of provisions, for example those aimed at automatic acquisition of citizenship at birth, is relatively restricted (e.g. when only children whose father is a citizen can acquire citizenship). Or the acquisition of citizenship, for example by immigrants through ordinary naturalization, may be conditional upon meeting strict criteria, such as a long residence period, language and civic integration requirements, the renunciation of any other citizenship, or the payment of a high fee. Variation in such formal requirements, as well as the extent to which they are enforced in practice, can make a citizenship regime relatively more or less inclusive.

Whereas most existing citizenship typologies focus on the relative accessibility of the status, when considering citizenship regimes comprehensively also the rights and benefits associated with citizenship can make a regime more or less inclusive. In other words, the extent to which citizenship as a status differentiates in terms of entitlements equally affects the relative inclusiveness of the regime; even if the formal status is difficult to acquire, if rights have a universal scope and are not reserved for citizens only, this would make a citizenship regime still more ‘liberal’ or inclusive. Given the wide variety in ways in which citizenship can be acquired, as well as the range of civil, political, and social rights that may be either attached to the status or made available more universally, conceptualizing citizenship categorically as singularly inclusive or exclusive would make little sense; inclusiveness is clearly a matter of degree, not of kind. Hence the range of qualitative or quantitative indicators developed that aim to measure this relative inclusiveness along a number of predefined criteria for openness.

Two typological questions remain, however. First, are political dynamics of inclusion the same for status and rights? Within a one-dimensional conception of inclusiveness, status and rights can be conceived of either as complementary or as alternatives. In the first scenario, citizenship acquisition can be seen as *complementary* to the granting of social and political rights to immigrants, as a necessary step in the process of full integration in the political community. Here regimes would be expected to be equally inclusive with regard to membership and rights. In the second scenario, granting access to formal membership through naturalization may instead be seen as an *alternative* to granting social and political rights, independent of citizenship status. In this conceptualization regimes that are inclusive with regard to rights are expected to be exclusive with regard to membership. Is there a trade-off between membership, measured by access to citizenship, and access to rights?

¹¹ Rogers Brubaker, *Citizenship and Nationhood in France and Germany* (Cambridge: Harvard University Press, 1992).

Huddleston and Vink research this question on the basis of evidence in twenty-nine European regimes and find that extending membership and rights are generally used as complementary, rather than alternative, means to immigrant integration. These findings do not invalidate the ‘alternative’ view as a normative stance, but they do suggest that it is rarely practiced in Europe.¹² In related work, however, Ruhs finds that when membership is measured as territorial admission, thus looking at immigration control, there are trade-offs between membership and rights. This study has a broader geographical scope, focusing on global developed economies, including both democratic and authoritarian regimes. Ruhs finds that, across these states, labor immigration programs that have inclusive admission policies will be restrictive in terms of attributing rights to immigrants and, vice versa, programs that are inclusive with regard to rights tend to do so under the condition of strict admission policies. In other words, there is a ‘price of rights.’¹³

The second typological question is whether it makes sense to map all variation in terms of access to status and access to rights on a single dimension of inclusiveness. Conceptually, scholars have argued that the inclusiveness of a polity’s understanding of citizenship may be reflected along multiple dimensions. For example, Koopmans *et al* argue that regimes vary not just along an individual equality dimension, where citizenship status and rights are more or less accessible to immigrants, but also along a second dimension that shows how countries deal with cultural and religious diversity. On the second dimension countries range from those that are willing to recognize minority groups and adopt a pluralistic strategy by granting cultural and religious group rights to those that are reluctant to recognize such groups and do not grant any specific rights but require immigrants to assimilate to a dominant culture. This then leads to a two-by-two typology where regimes can be civic-territorial or ethnic (on the ‘equality of access’ dimension) and culturally monist or pluralist (on the ‘cultural difference and group rights’ dimension).¹⁴ The purpose of a multi-dimensional typology is thus to cover a broader range of conceptions of inclusiveness and to allow for more fine-grained distinctions between regime types.

Comprehensive versus specific. A second line of differentiation between typologies is between those that comprehensively focus on a range of issues related to the relative inclusiveness of citizenship regimes and those that focus on specific issues only. Koopmans *et al*’s typology of citizenship rights for immigrants is an example

¹² Thomas Huddleston and Maarten Vink, ‘Full Membership or Equal Rights? The Link Between Naturalisation and Integration Policies for Immigrants in 29 European States,’ *Comparative Migration Studies* 3, no. 1 (2015): pp. 1–19, p. 8.

¹³ Martin Ruhs, *The Price of Rights: Regulating International Labor Migration* (Princeton: Princeton University Press, 2013).

¹⁴ Ruud Koopmans, Ines Michalowski, and Stine Waibel, ‘Citizenship Rights for Immigrants: National Political Processes and Cross-National Convergence in Western Europe, 1980–2008,’ *American Journal of Sociology* 117, no. 4 (2012): pp. 1202–1245.

of a comprehensive typology, in the sense that it covers indicators both for access to citizenship as well as for policies aimed at accommodating cultural and religious diversity. Another example, the Migration Integration Policy Index (MIPEX),¹⁵ also provides a comprehensive (though one-dimensional) typology as it includes indicators measuring inclusiveness in eight broad domains of immigrant integration. The purpose of such comprehensive typologies is to capture inclusiveness on a broad range of relevant citizenship issues, yet they mostly (though not necessarily) do so at the cost of only taking into account selective target populations of citizenship regimes, in these cases immigrant populations. As a consequence, such typologies are at best partly comprehensive, in the sense that only citizenship issues relevant to the selective target population are considered.

Specific typologies are more focused in terms of the range of issues covered. For example, Howard's Citizenship Policy Index¹⁶ and Janoski's Barriers to Naturalization Index¹⁷ capture the restrictiveness of national citizenship regimes in terms of access to citizenship status for groups of immigrant background within, respectively, EU and OECD countries. These specific indices thus consider a narrow target population. However, other specific typologies have a broader understanding of the relevant target population. In their comparative analysis of thirty-six European citizenship laws, Vink and Bauböck argue that these laws determine the degree of inclusiveness not only towards *immigrants*, but also towards *emigrants*. For example, they find variation with regard to the automatic transmission of citizenship to second and later generations of emigrant descent. Moreover, citizenship law regulates not just the *acquisition*, but also the *loss* of citizenship. For example, in some regimes the loss of citizenship is caused by voluntarily naturalizing abroad, or even by the mere fact of residing abroad. As a consequence, typologies developed to cover all relevant variation between citizenship laws need to take into account populations of former citizen residents, their descendants, as well as broader ethno-culturally conceived kin populations, in addition to the resident population.¹⁸ Vink and Bauböck argue that citizenship regimes can, for historical, political, or demographic reasons, prioritize one type of inclusiveness over the other, while 'expansive' regimes can also display a strong degree of inclusiveness on both dimensions and, by contrast, 'insular' regimes can restrict both types of inclusiveness. This results in four ideal-typic citizenship regimes: those that emphasize either exclusively

¹⁵ Thomas Huddleston, Ozge Bilgili, Anne-Linde Joki and Zvezda Vankova, 'Migrant Integration Policy Index 2015,' edited by Migrant Policy Group (Brussels: 2015), online <http://mipex.eu>.

¹⁶ Marc Morjé Howard, *The Politics of Citizenship in Europe* (Cambridge: Cambridge University Press, 2009), p. 40.

¹⁷ Thomas Janoski, *The Ironies of Citizenship: Naturalization and Integration in Industrialized Countries* (Cambridge: Cambridge University Press, 2010).

¹⁸ Maarten Peter Vink and Rainer Bauböck, 'Citizenship Configurations: Analysing the Multiple Purposes of Citizenship Regimes in Europe,' *Comparative European Politics* 11, no. 5 (2013): pp. 621–648.

ethnocultural or territorial selection criteria and those that combine restrictions or inclusiveness on both dimensions.¹⁹

Static versus dynamic. Typologies are standard elements of a comparativist's toolbox as they help structuring our understanding of similarities and differences across political units. Yet by fitting regimes within abstract categories, typologies also come at a price, as they have the tendency to reify ideal-types, which should at best be used as heuristic device, but not be confused with constructs that have an actual correspondence with empirical reality.²⁰ The best, or worst for that matter, example of such misplaced reification in the comparative citizenship literature is the nationhood model distinguishing between 'ethnic' and 'civic' nations. Drawing on an older literature on types of nationalism, this distinction is frequently related to citizenship regimes where ethnic nations are associated with the prevalence of descent-based citizenship rules (*jus sanguinis*) and civic nations with territorial access to citizenship (*jus soli*). This nationhood model of citizenship regimes is often linked to Brubaker's 1992 work on *Citizenship and Nationhood in France and Germany*,²¹ still a standard reference for any comparative work on citizenship regimes, despite Brubaker himself having joined authors who questioned the theoretical consistency of the dichotomy between civic and ethnocultural national citizenship models.²²

What should be derived from Brubaker's focused comparison of two European countries with interconnected, though different political histories of state-formation is not that citizenship regimes neatly reflect ideal-typic civic or ethnic nations but rather, first of all, that understanding citizenship regimes requires a context-sensitive approach (more on historical institutionalism below). What cannot be derived from this study, and should be avoided when comparing citizenship regimes, is what Brubaker himself has later termed as 'groupism' or the 'realism of the group': 'the social ontology that leads us to talk and write about ethnic groups and nations as real entities, as communities, as substantial, enduring, internally homogenous and externally bounded collectivities.'²³ Clearly, notwithstanding the relevance of path-dependency, political reality is more complex, contested, and constructed than would be suggested by assuming the existence of pre-defined, unchanging collectivities as 'civic' and 'ethnic' nations.²⁴

¹⁹ Ibid.

²⁰ Christophe Bertossi and Jan Willem Duyvendak, 'Introduction: National Models of Immigrant Integration: The Costs for Comparative Research,' *Comparative European Politics* 10, no. 3 (2012): pp. 237–247; Christian Joppke, 'Beyond National Models: Civic Integration Policies for Immigrants in Western Europe,' *West European Politics* 30, no. 1 (2007): pp. 1–22.

²¹ Brubaker (n 11).

²² Bernard Yack, 'The Myth of the Civic Nation,' *Critical Review* 10, no. 2 (1996): pp. 193–211; Rogers Brubaker, 'Myths and Misconceptions in the Study of Nationalism,' in J. Hall, ed., *The State of the Nation* (Cambridge: Cambridge University Press, 1998), pp. 272–306.

²³ Brubaker (n 22), p. 292.

²⁴ Christian Joppke, *Selecting by Origin: Ethnic Migration in the Liberal State* (Cambridge: Harvard University Press, 2005), pp. 16–21.

Ideal-type models come with a second downside: they are inherently static. In the case of Brubaker's study, he arguably invited such a critique by explicitly engaging with the argument that citizenship policies had 'so far' escaped convergence.²⁵ Today the paradigmatic French and German citizenship regimes look much more similar, even as the extent to which this process of convergence can be generalized remains a matter of some empirical controversy.²⁶ Any typology must come with a strong caveat about the historical contingency of a model that aims to make sense of a contested and changing reality.

DETERMINANTS OF CITIZENSHIP REGIMES

Which factors structure and explain variation in citizenship regimes? The literature treating them as a dependent variable has a long tradition, most prominently within historical approaches and area studies. Scholars based in law and the social sciences, including comparative politics and international relations, have also furthered our understanding of the domestic evolution of citizenship regimes. Here I focus on three dominant sets of explanations offered in citizenship studies: historical institutionalism; comparative law and political science; and international diffusion. For analytical clarity these three approaches are discussed separately, even though within individual studies two or even all three of these approaches may be combined.

Historical institutionalism. Given that citizenship regimes are closely linked to political self-determination, accounts of why states (or other political communities, such as cities, regions, or supranational organizations) are characterized by specific types of citizenship regimes are often grounded in some path-dependent conception of state-building processes and long-term demographic trends. Brubaker's 1992 study of France and Germany²⁷ is an exemplary—though disputed²⁸—historical contextualization of citizenship regimes. In this work the 'state-centered' nation of France is presented as a case where the political integration of all people resident

²⁵ Brubaker (n 11), p. 180.

²⁶ Patrick Weil, 'Access to Citizenship: A Comparison of Twenty-Five Nationality Laws,' in Alexander Aleinikoff and Douglas Klusmeyer, eds., *Citizenship Today: Global Perspectives and Practices* (Washington: Carnegie Endowment for International Peace, 2001), pp. 17–35; Marc Morjé Howard, 'Variation in Dual Citizenship Policies in the Countries of the EU,' *International Migration Review* 39, no. 3 (2005): pp. 697–720.

²⁷ Brubaker (n 11).

²⁸ Patrick Weil, *Qu'est-ce qu'un français? Histoire de la nationalité française depuis la Révolution* (Paris: Gallimard, 2005).

within a territory is prioritized and thus citizenship is attributed mainly via birth-place (*jus soli*). In such a case, Brubaker argues, rules for immigrant naturalization can be relatively accessible in order to achieve the inclusion of a high percentage of the resident population as formal members of the polity. By contrast, in an ‘ethnocultural’ nation as pre-reunification Germany, the integration of a people across borders is prioritized and thus citizenship is attributed mainly via bloodline (*jus sanguinis*). Naturalization is difficult under such a regime for those who are not seen to belong to the ethnic nation, which means that large communities of long-term residents may not have access to citizenship. Favell’s study of immigration and the idea of citizenship in France and Britain provides another classic example of ‘the power of path dependency’ and how responses to contemporary challenges posed by immigration are shaped by the core language and conceptual terms embedded in broader public philosophies of integration.²⁹

Other notable studies within this historical institutionalism tradition serve a revisionist purpose of debunking sometimes all-too-rosy accounts of how an inclusive citizenship was established within contemporary democracies. Groundbreaking, in historical scope and theoretical depth, is Smith’s account of a liberal democratic America that ‘never was.’ In this history of American citizenship law, Smith demonstrates how throughout most of the time from the colonial period to the Progressive era, exclusion based on race, ethnicity, and gender denied many Americans access to full citizenship.³⁰ FitzGerald and Cook-Martin provide an account of the relation between democracy and racism in a similar revisionist vein, but throughout the Americas. Rather than being antithetical, they argue, democratic institutions created effective channels for material and ideological interest groups to demand restriction.³¹ In Europe, Hampshire’s account of the racialized politics of immigration in postwar Britain, where ideas of citizenship and belonging are redefined in order to address wider concerns of demographic governance, touches on a similar theme.³²

Comparative law and political science. Systematic comparative analyses with a broad, though usually regional, geographical focus have traditionally been the field of comparative legal scholars.³³ They are primarily focused on describing and categorizing national laws, as well as making a normative assessment in light of constitutional and international law standards. Insofar as these legal comparative

²⁹ Adrian Favell, *Philosophies of Integration: Immigration and the Idea of Citizenship in France and Britain*, 2nd edition (Basingstoke, New York: Palgrave, 2001), p. 241.

³⁰ Rogers Smith, *Civic Ideals: Conflicting Visions of Citizenship in US History* (New Haven: Yale University Press, 1997).

³¹ David Scott FitzGerald and David Cook-Martin, *Culling the Masses* (Cambridge: Harvard University Press, 2014). See also FitzGerald in this volume.

³² James Hampshire, *Citizenship and Belonging: Immigration and the Politics of Demographic Governance in Postwar Britain* (Basingstoke: Palgrave Macmillan, 2005).

³³ Gerard-René de Groot, *Staatsangehörigkeitsrecht im Wandel* (Köln: Heymanns, 1989).

approaches propose explanatory inferences about the origins of citizenship regimes, they point mostly towards constitutional traditions and legal transplants, such as from former metropole to colonial dominion.³⁴

Building on this tradition, but making significant steps towards a social science research agenda with a global scope, Weil's comparative study of the citizenship laws of twenty-five states points at the relevance of legal traditions as a key factor explaining historical continuity of citizenship policies and especially the rules of attribution of citizenship at birth. Historically, the rule of *jus soli* derives from the feudal tradition in which persons owed allegiance to the monarch in virtue of birth in the kingdom. Seeking to discard this tradition, post-revolutionary France replaced the rule of *jus soli* with the rule of *jus sanguinis* in which legal status was transmitted from father to child like the family name. Whereas *jus soli* was preserved in the United Kingdom and exported to British colonies, *jus sanguinis* was adopted together with the Napoleonic civil law system by most continental European countries.³⁵

In recent years, a number of comparative political science studies have aimed to develop more systematic explanatory accounts of variation in citizenship regimes. Howard analyses the politics of citizenship in fifteen member states of the European Union (EU) and develops an explanatory argument based on a combination of historical, demographic, and political factors. He argues that former colonial powers which democratized early were able to develop historically more liberal citizenship and immigration policies. The early exposure to diversity due to colonial experience helped these countries consolidate their national identities leading to 'more open avenues to citizenship'.³⁶ In a related but different vein, Janoski argues that colonialism had a liberalizing effect on citizenship only in those colonial regimes, such as the French and British cases, that developed beyond the initial stages of repression.³⁷

According to Joppke the major explanatory factor for the development of national citizenship policies is the colour of the government in charge in that country, that is whether a left-wing or a right-wing political party dominates the government. Due to its 'universalist vocation,' the political left is more prone to support the political integration of immigrants and thus to push towards more liberal citizenship policies.³⁸ A key example here is the experience of the red-green Schröder government that took office in Germany in 1998 and as one of its first acts

³⁴ Gianluca P. Parolin, *Citizenship in the Arab World: Kin, Religion and Nation-State* (Amsterdam: Amsterdam University Press, 2009).

³⁵ Weil (n 26), pp. 19–21. ³⁶ Howard (n 16).

³⁷ Janoski (n 17), pp. 9–10. Cf. Ruud Koopmans and Ines Michalowski, 'Why Do States Extend Rights to Immigrants? Institutional Settings and Historical Legacies across 44 Countries Worldwide,' *Comparative Political Studies*, early access (2016).

³⁸ Christian Joppke, 'Citizenship between De- and Re-Ethnicization,' *European Journal of Sociology* 44, no. 3 (2003): pp. 429–458, p. 431.

of government introduced a bill radically modernizing German citizenship law.³⁹ Howard, however, draws a more complex picture by arguing that, although liberalizing changes are more likely to occur when left-wing political parties are in power, the most important factor is the presence and electoral strength of right-wing anti-immigrant parties.⁴⁰ The precise relevance of colonial experience and party politics for the (changing) regulation of citizenship remains a matter of controversy and needs to be researched more systematically.

Whereas many of the explanatory accounts of citizenship regimes are focused on regulations concerning access to citizenship for immigrants, citizenship regimes also regulate access to and loss of the status for emigrants and diaspora communities. Contrasting this with a ‘de-ethnicization’ trend of citizenship policies for immigrants, Joppke identifies a ‘re-ethnicization’ trend in the recent initiatives of states to maintain or re-establish formal ties with emigrants and their descendants.⁴¹ Laws that entitle members of kin minorities to various economic, socio-cultural and symbolic benefits, as well as those granted facilitated access to citizenship, may be viewed as an indicator for an active ethnocultural agenda of the state. Shevel analyzes the citizenship policies of fifteen post-USSR states, particularly noting the preferential treatment towards co-ethnics in many of these states.⁴² Ragazzi compares diaspora policies in thirty-five states worldwide, among which citizenship policies. His explanatory framework emphasizes economic and demographic factors and what he terms as ‘governmentality’ (fiscal pressure, financial and labor deregulation, openness to international trade).⁴³

International diffusion. A third and still relatively recent body of literature looks at citizenship regimes from an international relations perspective and aims to overcome the almost inevitable methodological nationalism in a field where the dependent variable is so closely related to the core of national sovereignty. These studies recognize that even with regard to citizenship, policy makers in one country are sometimes influenced by the decisions made in other countries.

The interdependence between countries is more obvious in some regions than in others. For example, within the Council of Europe, the mostly defunct 1963 Strasbourg Convention on the Reduction of Cases of Multiple Nationality provides a clear example of a reciprocity-based framework. Today, the 1997 European Convention on Nationality⁴⁴ provides a concrete framework for intergovernmental

³⁹ Simon Green, ‘Much Ado about Not-Very-Much? Assessing Ten Years of German Citizenship Reform,’ *Citizenship Studies* 16, no. 2 (2012): pp. 173–188.

⁴⁰ Howard (n 16). ⁴¹ Joppke (n 38).

⁴² Oxana Shevel, ‘The Politics of Citizenship Policy in New States,’ *Comparative Politics* 41, no. 3 (2009): pp. 273–291.

⁴³ Francesco Ragazzi, ‘A Comparative Analysis of Diaspora Policies,’ *Political Geography* 41 (2014): pp. 74–89.

⁴⁴ Gerard-René de Groot and Olivier Willem Vonk, *International Standards on Nationality Law: Texts, Cases and Materials* (Wolf Publishers, 2016). See also Strumia in this volume.

consultations on developments in the field of citizenship law. In one of the earliest explicit studies of policy diffusion within the realm of citizenship, Checkel analyzes how the work of the Council of Europe produced a changing normative context to shared understandings of citizenship, especially with regard to the increasing acceptance of dual citizenship.⁴⁵ Similar observations about the importance of ‘venues for the sharing of ideas and experiences among member states,’ in light of a broader process of converging citizenship policies in Europe, are echoed by Hansen and Weil.⁴⁶

Another sub-strand of literature, more inspired by transnationalism studies than by international relations, highlights the diffusion of diaspora engagement practices. In a recent literature review Gamlen identifies epistemic communities and policy diffusion as a key explanation of what he sees as ‘the rise of diaspora institutions.’⁴⁷ For example, Delano demonstrates how Latin American countries have developed similar practices and institutions regarding consular protection and service provision for their populations in the United States as a result of formal and informal collaboration between governments.⁴⁸ In a global study, Turcu and Urbatsch find that neighbors’ recent enactment of overseas voting nearly doubles the chance that a country will enfranchise its own diaspora.⁴⁹ With regard to the gradual acceptance of dual citizenship for emigrants, Escobar observes that ‘regional diffusion ... was a contributing factor because the countries that established dual citizenship early served as examples and, in some instances, as providers of direct advice to the other countries.’⁵⁰ Vink *et al* test this diffusion hypothesis on the basis of a longitudinal dataset and confirm that states have a significantly higher propensity to move to a tolerant dual citizenship policy for expatriates if neighboring states have done so.⁵¹ Conversely, states may also react unilaterally to counter policies of other states, as demonstrated by the tit-for-tat where Slovakia introduced a dual citizenship ban in 2010 following Hungary’s recent expansive citizenship policy affecting its diaspora

⁴⁵ Jeffrey T. Checkel, ‘Norms, Institutions, and National Identity in Contemporary Europe,’ *International Studies Quarterly* 43, no. 1 (1999): pp. 84–114.

⁴⁶ Randall Hansen and Patrick Weil, ‘Introduction: Citizenship, Immigration and Nationality: Towards a Convergence in Europe?’, in Randall Hansen and Patrick Weil, eds., *Towards a European Nationality. Citizenship, Immigration and Nationality Law in the EU* (Basingstoke: Palgrave Macmillan, 2001), pp. 1–23, p. 13.

⁴⁷ Alan Gamlen, ‘Diaspora Institutions and Diaspora Governance,’ *International Migration Review* 48 (2014): pp. S180–S217.

⁴⁸ Alexandra Délano, ‘The Diffusion of Diaspora Engagement Policies: A Latin American Agenda,’ *Political Geography* 41 (2014): pp. 90–100.

⁴⁹ Turcu, Anca and R. Urbatsch, ‘Diffusion of Diaspora Enfranchisement Norms: A Multinational Study,’ *Comparative Political Studies* 48, no. 4 (2015): pp. 407–437.

⁵⁰ Cristina Escobar, ‘Extraterritorial Political Rights and Dual Citizenship in Latin America,’ *Latin American Research Review* 42, no. 3 (2007): pp. 43–75, pp. 51–52.

⁵¹ Maarten Peter Vink, Arjan H. Schakel, David Reichel, Gerard-René de Groot, and N. Chun Luk, ‘The International Diffusion of Expatriate Dual Citizenship Policies’ (Maastricht, 2016) (unpublished manuscript, on file with author).

in neighbouring Slovakia. In other words, the mechanisms of interdependent citizenship regimes can generate not just convergent, but also divergent or conflicting outcomes.

CONSEQUENCES OF CITIZENSHIP REGIMES

How do citizenship regimes impact other outcomes? Whereas most scholarly work has been done on citizenship regime typologies and a significant body of work exists on the determinants of regimes, there is less work on the consequences of regimes. Certain consequences are often assumed (by scholars or politicians), for example, in terms of more restrictive policies being detrimental or, by contrast, conducive to immigrant integration, but such questions are not often systematically investigated.

Citizenship acquisition rates. In this context, most scholarly attention has been devoted to the consequences of citizenship regimes for the outcome most directly related to public policies, namely the ascension to citizenship, especially among immigrants. The requirements set by law, such as scope of eligibility, years of required residence, language and integration requirements, dual citizenship acceptance, and fees determine the eligibility of persons to acquire citizenship and the conditions under which they can do so. Hence, imposing stricter requirements or, by contrast, removing or lowering existing requirements can have a direct effect on acquisition rates among target groups of these regulations. Given that requirements vary significantly between countries it is unsurprising that immigrant naturalization rates vary greatly across countries.

Research in this field, especially the North American literature, has focused traditionally on explaining variation in naturalization rates among immigrant *groups*, rather than among countries. Typically, these studies look at a range of individual characteristics, such as educational attainment, age at migration, years of residence, family situation and, relating to country of origin, economic development and political regime.⁵² Insofar as these studies have investigated the relevance of the citizenship regimes, they do so mostly with a view to the legislation in countries of origin, in particular in relation to toleration of dual citizenship.⁵³ A notable exception is

⁵² Philip Q. Yang, 'Explaining Immigrant Naturalization,' *International Migration Review* 28, no. 3 (1994): pp. 449–477; Barry Chiswick and Paul W. Miller, 'Citizenship in the United States: The Roles of Immigrant Characteristics and Country of Origin,' *Research in Labor Economics* 29 (2009): pp. 91–130.

⁵³ Michael Jones-Correa, 'Under Two Flags: Dual Nationality in Latin American and its Consequences for Naturalization in the United States,' *International Migration Review* 35, no. 4 (2001): pp. 997–1029; Jonas Helgertz and Pieter Bevelander, 'The Influence of Partner Choice and Country of Origin

provided by Bloemraad's comparative study of immigrant incorporation in Canada and the United States, which shows the limitations of a model that only takes into account micro-level and group characteristics. By focusing on a comparable group of Portuguese immigrants, both in Toronto and in Boston, Bloemraad investigates what drives the significantly higher naturalization rates and more visible political engagement in the Canadian context. She demonstrates that the role of government goes beyond the formal regulation of access to citizenship and that hence citizenship regimes should be conceived more broadly as the opportunity structure for mobilization, including promotion of citizenship and bureaucratic practice.⁵⁴

In the European context, due to widely varying citizenship policies both between and within countries, scholars have traditionally paid greater attention to the effects of regimes. In a comparison of sixteen European countries, controlling for micro-level characteristics, Vink *et al* demonstrate that cross-national naturalization gaps are indeed partly explained by policies. However, they find that the positive relation between citizenship policy and naturalization rates only holds among immigrants from less developed countries; in other words, policies matter for those groups who are most interested in naturalizing.⁵⁵ Peters *et al* produce similar findings on the basis of longitudinal register data from the Netherlands, utilizing a Dutch policy shift in 2003 that significantly restricted the conditions for access to citizenship.⁵⁶ Hainmueller and Hangartner, based on an original quasi-experimental design, demonstrate that in the specific context of Switzerland where, until recently, some municipalities used referendums to decide on the citizenship applications of foreign residents, discrimination on the basis of the origin country characteristics of applicants had a significant impact on naturalization rates among immigrant groups.⁵⁷

Immigrant integration. Koopmans, controversially, observes a trade-off between citizenship rights and a broad range of immigrant integration outcomes such as labor market participation, levels of segregation, and an overrepresentation of immigrants among those convicted for criminal behavior. Based on comparative analyses of aggregate level national data, he finds that policies that grant immigrants easy access to equal rights (e.g. through easy access to citizenship) and do not provide strong incentives for host-country language acquisition and interethnic

Characteristics on the Naturalization of Immigrants in Sweden: A Longitudinal Analysis,' *International Migration Review*, early access (2016).

⁵⁴ Bloemraad (n 10).

⁵⁵ Maarten Peter Vink, Tijana Prokic-Breuer, and Jaap Dronkers, 'Immigrant Naturalization in the Context of Institutional Diversity: Policy Matters, but to Whom?,' *International Migration* 51, no. 5 (2013): pp. 1–20.

⁵⁶ Floris Peters, Maarten Vink, and Hans Schmeets, 'The Ecology of Immigrant Naturalisation: A Life Course Approach in the Context of Institutional Conditions,' *Journal of Ethnic and Migration Studies* 42, no. 3 (2016): pp. 359–381.

⁵⁷ Jens Hainmueller and Dominik Hangartner, 'Who Gets a Swiss passport? A Natural Experiment in Immigrant Discrimination,' *American Political Science Review* 107, no. 1 (2013): pp. 159–187.

contacts have produced suboptimal outcomes when combined with a generous welfare state.⁵⁸ However, Goodman Wallace and Wright, who study the effects of civic requirements for immigration, settlement, and citizenship on socio-economic and political outcomes on the basis of micro-level data, find 'little evidence that these requirements produce tangible, long-term integration change'.⁵⁹ The substantial body of literature on the 'citizenship premium' provides further clues for the economic impact of citizenship regimes.⁶⁰ Bevelander and Devoretz, synthesizing the results of six national studies in Europe and North America, conclude that the relative accessibility of citizenship matters, but they suggest a trade-off with immigration policies: liberal citizenship regimes enhance the economic integration of their potential citizens only if there is a rigorous screening device for immigrant entry.⁶¹ Looking at the impact of citizenship regimes on the second or even subsequent immigrant generations, one study shows a positive impact of the introduction of birthright citizenship in Germany in 1999 on educational attainment.⁶² Yet comparable research is scarce.

Mobility. Looking beyond the effect of citizenship regimes on acquisition rates and immigrant integration, some scholars have explored the relation between citizenship and mobility. Alarian and Goodman argue that citizenship policies, in particular the restriction or facilitation of dual citizenship, affect bilateral migration flows. Their analyses suggest that dual-citizenship-allowing sending states experience significantly more migration than dual-citizenship-forbidding sending states. They find the highest flow between sending and receiving states allowing dual citizenship.⁶³ Others have looked at return migration or out-migration to another destination, which economists have argued can be viewed as part of an optimal

⁵⁸ Ruud Koopmans, 'Trade-Offs between Equality and Difference: Immigrant Integration, Multiculturalism and the Welfare State in Cross-National Perspective,' *Journal of Ethnic and Migration Studies* 36, no. 1 (2010): pp. 1–26.

⁵⁹ Sara Wallace Goodman and Matthew Wright, 'Does Mandatory Integration Matter? Effects of Civic Requirements on Immigrant Socio-Economic and Political Outcomes,' *Journal of Ethnic and Migration Studies* 41, no. 12 (2015): pp. 1885–1908.

⁶⁰ Liebig, T. and F. Von Haaren, 'Citizenship and the Socioeconomic Integration of Immigrants and Their Children,' in *Naturalisation: A Passport for the Better Integration of Immigrants?* (Paris: OECD, 2011), p. 28.

⁶¹ Pieter Bevelander and Don DeVoretz, 'The Economics of Citizenship: A Synthesis,' in Pieter Bevelander and Don DeVoretz, eds., *The Economics of Citizenship* (Malmö University (MIM), 2008), pp. 165. Cf. DeVoretz and Irastorza, 'Economic Theories of Citizenship' and Bloemraad, 'Does Citizenship Matter?', in this volume.

⁶² Judith Saurer and Christina Felfe, 'Granting Birthright Citizenship—A Door Opener for Immigrant Children's Educational Participation and Success?,' Paper presented at the 'Jahrestagung des Vereins für Socialpolitik 2014: Evidenzbasierte Wirtschaftspolitik—Session: Migration II, No. E05-V4' (2014), online <https://www.econstor.eu/dspace/handle/10419/100548?locale=de>.

⁶³ Hannah M. Alarian and Sara Wallace Goodman, 'Dual Citizenship Allowance and Migration Flow: An Origin Story,' *Comparative Political Studies*, early access (2016).

life-cycle residential location sequence.⁶⁴ While the comparative citizenship literature has largely overlooked the mobility effects of naturalization, one exception are Kuhlenkasper and Steinhardt who find that out-migrants are less likely to be naturalized German citizens and on average have spent fewer years in Germany than their counterparts who stay in Germany. This ‘negative mobility’ only applies to non-Turkish immigrants.⁶⁵ Due to lack of comparable studies, it is unclear whether these findings can be generalized beyond the German context but it points to the need for scholars to assess the implications of citizenship regimes in the wider sense of transnational mobility, going beyond the often strictly internal perspective of immigrant integration.⁶⁶

CONCLUSIONS: TOWARDS AN INTEGRATED COMPARATIVE RESEARCH AGENDA

While the comparative research agenda of citizenship regimes can be broken down into analytically distinct questions and approaches, a comprehensive understanding of the dynamics of citizenship regimes demands a more integrated approach. For example, literature on either the determinants or the consequences of citizenship regimes needs to build on a nuanced understanding of the variation between regimes and, hence, draw on the state of the art on typologies of citizenship regimes. For a good understanding of the consequences of citizenship regimes, we need to take into account also the determinants of variation between regimes. In this concluding section, avenues for further comparative research are suggested, building on the previous discussion and taking into account some key theoretical and methodological challenges.

Generalizability. Much of the literature, especially the comparatively oriented work (as also reflected in this chapter), is biased towards Western Europe and North America, or more generally towards developed democracies. Though some

⁶⁴ George J. Borjas and Bernt Bratsberg, ‘Who Leaves? The Outmigration of the Foreign-Born,’ *The Review of Economics and Statistics* 78, no. 1 (1996): pp. 165–176.

⁶⁵ Torben Kuhlenkasper and Max Friedrich Steinhardt, ‘Who Leaves and When? Selective Outmigration of Immigrants from Germany,’ HWWI Research Paper 128 (Hamburg Institute of International Economics, 2012), online http://www.hwwi.org/uploads/tx_wilpubdb/HWWI-Research-Paper-128.pdf.

⁶⁶ Czaika and De Haas, looking at the impact of restrictive visa policies, confirm that these restrictions decrease circulation (Mathias Czaika and Hein de Haas, ‘The Effect of Visas on Migration Processes,’ *International Migration Review*, early access (2016)).

advances have been made towards opening up the geographical scope of comparative citizenship research,⁶⁷ most scholarly ventures beyond what can be considered the usual suspects largely remains limited to descriptive case studies of the legal or political context of citizenship law in various countries.⁶⁸ Much theoretical work remains to be done to generalize our understanding of citizenship regimes, first by developing comprehensive regime typologies, but subsequently and even more so by enhancing our understanding of determinants and consequences of citizenship regimes.⁶⁹ For example, while scholars debate the effect of colonialism on the former imperial power, we know much less about the impact on the citizenship laws of the former colonies.

Interdisciplinarity. What you see depends on the lenses through which you look: while citizenship studies are widely considered an interdisciplinary field, most work is still structured along disciplinary lines. Lawyers describe and categorize nationality laws; historians and area studies scholars contextualize the historical and cultural origins of such laws; political scientists analyze the relevance of changing institutional conditions for variation within and between countries; political sociologists and economists estimate the impact of regime variation on micro-level outcomes; and international relations scholars look at the relevance of international cooperation and transnational diffusion. Scholarly specialization can and does enhance work within these respective subfields, but professional constraints related to publication traditions (e.g. books versus journal articles; separate journals for these subfields), publication language (e.g. publishing in a language other than in English is broadly accepted within law, history, and area studies but will make such work less accessible to political scientists, sociologists, and international relations scholars), and organization of the field (e.g. most scholarly conferences are organized by disciplinary field) significantly hamper the prospect for a more integrated comparative agenda.

Methodological nationalism. Few comparative studies go beyond the national paradigm, which may not be surprising given that citizenship (still) relates to the core of national sovereignty. However, this implies that explanatory accounts easily fall into the trap of essentializing national ‘models’ of citizenship, as discussed above. Scholars who take the constructivist challenge seriously would go beyond static, ideal-type approaches and develop models that better capture the contingency of citizenship regimes.⁷⁰ Furthermore, scholars comparing citizenship regimes need to

⁶⁷ Vink and Bauböck (n 18), for a comparative analysis of thirty-six West and East European countries. FitzGerald and Cook-Martin (n 31), for a comparative analysis of twenty-two countries in the Western Hemisphere. For a thematic comparative analysis of the nationality laws of fifty-four African countries, see Bronwen Manby, *Citizenship Law in Africa: A Comparative Study*, 3rd edition (Open Society Foundations, 2016).

⁶⁸ T. Alexander Aleinikoff and Douglas Klusmeyer, eds., *From Migrants to Citizens: Membership in a Changing World* (Washington: Carnegie Endowment, 2000).

⁶⁹ Sadiq in this volume; Chung in this volume. ⁷⁰ Wimmer (n 1).

take transnationalism seriously and develop models that better capture the embeddedness of citizenship regimes. Citizenship regimes may be largely nationally defined but the political practice of citizenship is embedded in a multilevel (local/regional—national—supranational) and transnational constellation of citizenship regimes.⁷¹

Data availability and validity. Comparative research is as good as scholars' data allow it to be; the current limited generalizability of comparative work reflects to an important degree the limitations of existing data. While significant advances have been made in recent years, especially but not exclusively in quantitative studies, we need more data covering a wider geographical range and with a larger temporal scope. This is important not only to enhance generalizability of comparative accounts, but also to test dynamic models on the relation between contextual factors (e.g. political, economic, demographic) and relevant outcomes (e.g. citizenship policies, naturalization rates, integration outcomes). While there are some notable advances, such as databases from MIPEX (the 2015 version covering thirty-eight countries including Europe, North America, Oceania, and South Korea),⁷² IMPALA (aiming to cover twenty OECD countries),⁷³ and the Global Citizenship Observatory (GLOBALCIT, covering over 150 countries from 2017), progress has focused on an expanding geographical scope. Most datasets are cross-sectional or have data for a limited number of years. Few existing datasets achieve both a global and longitudinal scope and those that do cover only selected indicators.⁷⁴ Of course, we need not just more data, but also valid indicators and reliable measurement. In the context of measuring the relative inclusiveness of citizenship regimes, some welcome but limited methodological debate has focused on how to construct quantitative policy indices from essentially qualitative provisions in national laws.⁷⁵

Political contestation. Finally, the research agenda of comparative citizenship studies is not just theoretically and empirically, but also politically shaped: much of the research is driven, to an important extent through external funding (such as by the European Commission, or private foundations) by specific agendas focused on issues

⁷¹ Rainer Bauböck, 'Studying Citizenship Constellations,' *Journal of Ethnic and Migration Studies* 36, no. 5 (2010): pp. 847–859.

⁷² Huddleston *et al* (n 15).

⁷³ Michel Beine, Anna Boucher, Brian Burgoon, Mary Crock, Justin Gest, Michael Hiscox, Patrick McGovern *et al*, 'Comparing Immigration Policies: An Overview from the IMPALA Database,' *International Migration Review* (2015), online <http://dx.doi.org/10.1111/imre.12169>.

⁷⁴ Maarten Peter Vink, Gerard-Rene De Groot Vink, and Ngo Chun Luk, 'MACIMIDE Global Expatriate Dual Citizenship Dataset,' Harvard Dataverse, V2, online <http://dx.doi.org/10.7910/DVN/TTMZo8>.

⁷⁵ Marc Helbling, 'Validating Integration and Citizenship Policy Indices,' *Comparative European Politics* 11, no. 5 (2013): pp. 555–576; Sara Wallace Goodman, 'Integration Requirements for Integration's Sake? Identifying, Categorising and Comparing Civic Integration Policies,' *Journal of Ethnic and Migration Studies* 36, no. 5 (2010): pp. 753–772; Ines Michalowski and Ricky van Oers, 'How Can We Categorise and Interpret Civic Integration Policies?,' *Journal of Ethnic and Migration Studies* 38, no. 1 (2012): pp. 163–171.

such as immigrant integration and security in Western democracy, or development, democratization, and diaspora politics in a non-Western context. As a result, research often takes place within, rather than across, such predefined policy concerns. Other political agendas, such as an international one of avoiding statelessness and refugee protection, have so far hardly inspired comparative studies on citizenship regimes.

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