

# **People, Borders, and Neighbours: Explaining Citizenship Policy Around the World**

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## ABSTRACT

Much research covers dual citizenship policies and their benefits. With the increasing number of countries with dual citizenship policies, very few studies identify the reasons behind a country's decision to adopt a certain type of citizenship policy. This thesis addresses this gap in the literature and aims to identify why some countries adopt dual citizenship policies while others keep single citizenship. It argues and tests the potential impact of physical capital, human capital, relations with neighbours, country image, regime type, political stability and governance, immigration levels, emigration levels, and colonisation experience. The empirical analyses employ a combination of quantitative techniques, including correlation and regression analysis, and qualitative case analysis, which involves the comparison of countries and a single case study of Italy, which is a representative case. The temporal scope of this research is 1945–2019, and the sample comprises 195 countries, as defined by the United Nations. This thesis reveals and contributes that as international exchanges and globalisation increase, external factors have a growing impact on citizenship policies, which are essentially private national policies. These factors include relations with neighbouring countries, compliance with global norms (country image), and the contagion effect of regional dynamics. These external factors increasingly influence a country's adoption of more inclusive and tolerant dual citizenship policies. Nevertheless, the characteristics of the country in question—internal factors—continue to exert an influence on its decision-making processes, including its colonial past and the pursuit of national economic development.

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Authors declaration:

“I declare that, except where explicit reference is made to the contribution of others, that this dissertation is the result of my own work and has not been submitted for any other degree at the University of Glasgow or any other institution.”

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Signature: \_\_

# CHAPTER 1

## INTRODUCTION

### 1.1 Overview

Citizenship is one of the core elements of Western political discourse (Hindes, 1993). In contemporary political science research, although citizenship was once ignored by mainstream academics (van Gunsteren, 2018), it has become recently one of the busiest research fields (Alarian et al., 2017; Chow & Mathien, 2018; Kim, 2019; Manby, 2016a; Mateos, 2019). Studies about citizenship have gradually expanded beyond the traditional categories of political philosophy and political theory, and have begun to be combined with empirical research. The recent work in citizenship studies are academic responses to, and reflections on, globalisation, regionalisation, and some new theories of social movements in Western society (Faist and Kivisto, 2007; Harpaz, 2015; Xia, 2013). This study examines the citizenship policies of countries worldwide in the context of the current phenomenon of increasing globalisation and regionalisation. Why do some countries have dual citizenship policies and others have single citizenship policies when dual citizenship policies seem to be the dominant trend?

Many works collectively illustrate the importance of citizenship in politics and its universal interpretability in relation to various different empirical phenomena, including transnational solidarity, social movements, and environmental policy. For example, Lahusen and Theiss (2019) discuss the concept of transnational European solidarity from the perspective of political citizenship, and conclude that solidarity activities in support of other Europeans are more likely among citizens with “civic” skills and commitments, stronger identification with the European Union, and preferences for more inclusive social rights. Their work underscores the importance of citizenship in fostering solidarity across national boundaries. Rovisco (2016) argues in favour of the role of digital media in fostering cosmopolitan citizenship. For example, the Indignados social movement in Europe, such as Italy and Greece, has fostered new forms of public discourse and protest that can fuel cosmopolitan solidarity through its use of digital media (Rovisco, 2016). Another study explains that the sustainable development discourse, which is based on neoliberal principles, has implications for environmental citizenship (Tulloch, 2016). Such insights highlight the importance of understanding the intersection of citizenship, environmental policy, and neoliberalism.

The lags and limitations of the traditional discourse system have prompted the development of new theories (Hindes, 1993; Seligman et al., 2000; R. Smith, 2003). In the past three decades, many new concepts related to citizenship have emerged, which together represent a significant process of theoretical reconstruction: “supranational citizenship”, “environmental citizenship”, “cultural citizenship”, or “multiple citizenships”. They are together gradually establishing a new discourse system for citizenship research (Oldfield et al., 1994; Side, 2006; R. Smith, 2003; Tulloch, 2016).

Understanding citizenship policies is of paramount importance in today's globalised world. The significance of these studies lies in their potential to inform policy decisions, protect individual rights, and foster a more inclusive and equitable global society. For example, Andriani and Prasetyo (2023) discuss the challenges faced by children from mixed marriages in Indonesia in the context of that country's largely single citizenship policy. They highlight the limitations of dual citizenship arrangements, which only apply until the child reaches 18 years old, after which they must choose one citizenship to avoid statelessness. Andriani and Prasetyo's study thus underscores the importance of researching citizenship policies to ensure that the rights of individuals, particularly children from mixed marriages, are protected. Meanwhile, Fadeev (2022) analyses the state of Russian identity and the role of civil, historical, and cultural components in its formation. The Republican Union (i.e., the former Union of Soviet Socialist Republics or USSR<sup>1</sup>) remains the basic consolidator of Russian identity, exemplifying the significance of understanding how citizenship policies can influence national identities and societal cohesion.

Furthermore, citizenship policies can have significant legal implications. Uzun (2022) analyses the transformation of, and modern conceptual problems associated with, interpreting the essence of the institution of citizenship. A conceptual shift in understanding the legal relationship between a citizen and the state produces far-reaching implications for the processes of political and legal global integration, transnationalisation, international migration, economic and national-territorial transformation, and geopolitical (de)construction (Uzun, 2022). Accordingly, citizenship has long been a subject of study. It is universally interpretable in relation to

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<sup>1</sup> The Union of Soviet Socialist Republics existed between 1922 and 1991, having been established after a lengthy civil war following the Russian revolution. The situation in the communist USSR changed drastically in 1991, when first the three Baltic States declared independence, followed by other former Union members, and the former Union of Soviet Socialist Republics was finally dissolved at the end of 1991, with each of the fifteen former Union Republics becoming independent and sovereign states.

various empirical phenomena, including transnational solidarity, social movements and environmental policy. Understanding citizenship is important, particularly single and dual citizenship, as it has the potential to inform policy decisions, protect individual rights, influence national identities and societal cohesion, and promote a more inclusive and equitable global society.

The overall trend is towards dual citizenship. As of 2019, of the 195 countries in the UN, this thesis investigates and statistically obtains 69% of countries have a dual citizenship policy, and 31% have a single citizenship policy. 34% of countries have converted at one time or another from a single to a dual citizenship policy (as of 2019, based on the post-WWII period). In contrast, only 1% of countries have changed from a dual citizenship policy to a single citizenship policy. A recent study by Antikowati et al. (2023) discusses the increasing demand for dual citizenship in Indonesia, a country that has traditionally used a single citizenship policy. The demand for dual citizenship has been driven by globalisation and the challenges faced by Indonesian diasporas due to its restrictive citizenship regulations. They suggest that Indonesia could adopt a model similar to the Overseas Citizenship of India (OCI) to provide more flexible opportunities for its citizens with foreign status (Antikowati et al., 2023).

Taeva (2022) analyses changes in the legal regulation of citizenship relations in Russia, and identifies three trends in Russia's migration policy based on changes in its legislation on citizenship: the liberalisation of migration legislation for people with a common historical and cultural past, ensuring national security and law and order, and a differentiation of approaches to dual and multiple citizenship.<sup>2</sup> These studies taken together suggest that while some countries are moving towards more flexible and inclusive dual citizenship policies, others are maintaining or reinforcing their single citizenship policies for various reasons, including attempts to uphold national security and societal cohesion. This highlights the complexity and diversity of citizenship policies across different countries and the importance of studying these policies in their specific socio-political contexts.

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<sup>2</sup> According to the Constitution of the Russian Federation, a citizen of the Russian Federation may have citizenship of a foreign state (dual citizenship) following federal law or an international treaty of the Russian Federation (Art. 62), i.e., dual citizenship provides for the existence of an international treaty.

Meanwhile, the current Law on Citizenship of 2002 does not make such a distinction. It defines dual citizenship as a citizen of the Russian Federation having citizenship (nationality) of a foreign state (Art. 3). The draft law of 2021, submitted by the President of the Russian Federation for consideration by the State Duma, made a clear divide between the concepts of dual and multiple citizenship by fixing the relevant definitions.

Therefore, given the research goal of studying citizenship policies in countries around the world, as stated at the beginning of this section: why do some countries have dual citizenship policies and others have single citizenship policies, a more specific research objective is to identify the factors associated with more tolerant and inclusive dual citizenship policies.

## **1.2 Gaps in the Literature and the Goal of this Thesis**

The research goal of this study is to explain citizenship policies around the world by identifying the factors associated with single or dual citizenship policies. The research question is why some countries have dual citizenship policies while others have single citizenship policies. Such a research goal is necessary because there are research gaps.

There is much research on the components of dual citizenship policies. Turner, Tamura and Mulholland (2013) and Fukuyama et al. (2018) discussed the long-term existence of production materials, such as machines, equipment, factories, buildings, transportation facilities, and money. Such long-term assets are difficult to replace with other types of capital (van den Berg, 2016). A growing body of research in recent years suggests that the growing number of developing countries have embraced a policy of dual citizenship because they see the benefits of the long-term presence of productive assets that are conducive to the development of their economies. (J. Blatter et al., 2009; Herzog, 2014). Dual citizenship policies can bring in talent, foreign investment, and capital flows, which are often what developing countries need in order to prosper. Developing countries have a more robust incentive for economic growth than developed countries.

Traditional theoretical approaches suggest that former colonial powers are likely to have more inclusive citizenship policies due to historical ties and obligations (Bhambra, 2014; Loomba, 2002; Mignolo, 2011). During the era of colonisation, many colonised people immigrated to the suzerain states to serve as local labour (Alarian et al., 2017; Shachar, 2012). Many colonial suzerain citizens migrated to the colonies, to take up management jobs and do other senior work. They settled there for higher salaries and to gain a higher social class (Alarian et al., 2017). Dahlin and Hironaka (2008) suggested that after the wave of colonial independence (1950-1980s), former colonist countries wanted both to keep the cheap labour who previously came from their colonies and to stay connected with the senior managers who were still living in the former colonies. Dual citizenship policies are a means of continuing to exert an

influence on “independent colonies” and to potentially control them to some extent. Bertilsson et al. (2006), Whitaker (2011), and Manby (2016) support this idea, and add that dual citizenship policies may also enable previous suzerain countries to continue to access and obtain resources, and probably votes (at the UN or in international bodies) from those ex-colonies in the future.

While citizenship policies across the globe are the subject of extensive study, a closer review of existing scholarship reveals an important theoretical gap: the absence of a comprehensive analytical framework for understanding why countries adopt single or dual citizenship policies. Existing work, such as Schlenker, Blatter and Birka's exploration of the implications of multiple citizenships (Schlenker et al., 2017), or Iheduru's study on the transformation of citizenship (Iheduru, 2011), predominantly focuses on specific aspects like identity, nationalism, or international relations. However, these fragmented approaches often overlook the broader structural conditions and variables that may account for the adoption of one form of citizenship over the other. This presents a challenge for comparability and limits the utility of individual studies as their findings remain isolated in their respective disciplinary boundaries (Lai & Chui, 2014; Paquet, 2012).

The absence of an analytical framework not only hampers comparability but also limits the synthesis of theories. For instance, while sociopolitical theories may attribute single citizenship policies to the ideals of nationhood and identity (Liang & Liu, 2009), economic theories might argue that such policies serve to attract foreign investment or skilled labour (J. Blatter et al., 2009; Herzog, 2014). Without a unified framework, it is difficult to test or validate these hypotheses in an integrated manner. Given these limitations, this thesis aims to develop an analytical framework to study the types of citizenship policies—single, conditional dual or dual—adopted by countries. The proposed framework brings together variables from different theoretical perspectives, including but not limited to political, economic, and sociocultural factors. By doing so, it will enable a more nuanced understanding that can serve as a basis for empirical testing and cross-national comparison. This framework not only fills a gap in citizenship studies but also provides an invaluable tool for policymakers and scholars to systematically assess and compare citizenship policies. It allows for the incorporation of diverse perspectives into a cohesive understanding, thus enriching both the academic discourse and practical implications related to citizenship.

Empirically, while these studies have examined many aspects of dual citizenship

policies and associated factors, they paid very little attention to the reasons for their acceptance or conversion to dual citizenship policies as more and more countries switch from single to dual citizenship policies. Many of them lack empirical verification, which highlights the need for this study. Blatter, Erdmann and Schwanke (2009) and Herzog (2014) who suggested the link between the benefits of economic growth and dual citizenship policies. More empirical studies are needed to test the theories and concepts proposed in the literature. A recent study by Uzun (2022) analyses the transformation of, and modern conceptual problems raised in, interpreting the essence of the institution of citizenship, but it does not provide empirical evidence to support its arguments. Such empirical gap calls for empirical verification. Given the rapid changes in international politics and migration patterns (Chow & Mathien, 2018; Erdal & Sagmo, 2017; Lowe, 2018), there is a pressing need for updated research. Policymakers can benefit from a comprehensive understanding of why certain models of citizenship are more prevalent than others, and how effective they are in achieving their intended objectives. For countries grappling with issues of immigration and integration, understanding the implications of dual citizenship can be crucial for fostering social cohesion and national unity. For individuals, understanding these policies can have practical implications, such as ease of travel, access to social services, and the ability to participate politically in multiple countries.

Additionally, many studies are cross-sectional, providing a snapshot of citizenship policies at a particular point in time or in a particular country. Some national case studies have been published on the above-argued impact of economic incentives and colonisation history on citizenship policies. Liu and Liang (2009) point out that Cambodia granted temporary citizenship to some Chinese citizens who had come to invest in Cambodia in 1995. Naujoks (2015) report that Pakistan announced its implementation of a dual citizenship recognition policy for Pakistanis who had acquired United States or Swedish citizenship in 2002. It can be seen that the countries for which these dual citizenship policies allowed citizenships to be held (at the same time as the national citizenship) are mostly targeted rich countries, as the host country assumes that people from developed countries hold more physical capital and can invest more in the host country. Kiwan (2005) mentions a country with among the most former colonies, the United Kingdom; after the Second World War, the UK decided that people from its colonies and British people who had stayed in the ex-colonies both had the right to British citizenship. Ho and Bairner (2013) similarly discuss Hong Kong and Macau.

Although China implements a single citizenship policy, people in Hong Kong and Macau are also allowed to hold British and Portuguese passports respectively, which has led to controversy regarding China's policy of dual citizenship being the default in Hong Kong and Macau.

Most of these studies are time-dependent and may not reflect the current state of affairs. The trend towards conversion to dual citizenship policies is greater at the time of writing than ever before as the world becomes more globalised, as populations become more mobile on a global scale, and as the world attaches increasing importance to citizenship. There is therefore a need to examine whether some of the factors proposed in previous studies in relation to these policies remain influential today, or whether they have become more influential or weaker, requiring the current study to discover and confirm the influence of various factors on citizenship policies. As the world becomes increasingly interconnected, more people are living, working, or studying outside their country of origin. This raises important questions about how citizenship policies can adapt to these new realities. Governments are continually revisiting their citizenship laws to address current challenges. An updated understanding can inform policy decisions that are more aligned with contemporary needs.

This research initially draws upon data from countries across the globe and employs statistical tools to gain insight into the relationship between various factors and dual citizenship policies. This serves as a foundation for the subsequent qualitative analysis. Subsequently, by comparing countries, we observe how these numbers manifest in real-world contexts, taking into account the country's unique circumstances. Many studies focus on single countries or regions, limiting understanding of how citizenship policies vary across different contexts. This limits the cross-national comparisons, which could provide valuable insights into the diversity and complexity of citizenship policies worldwide. For example, a recent study by Taeva (2022) analyses changes in the legal regulation of citizenship relations in Russia, but it does not compare these changes with those implemented in other countries. So, in this thesis, a diverse sample of countries is used to assess the global state of citizenship policies, including the types and variations of citizenship policies. Through a comparative analysis, it will be possible to explain citizenship policy choices around the world from a cross-country perspective, and specifically, why some countries have dual citizenship policies in contemporary times while others have retained single citizenship policies.



This thesis also implements longitudinal studies. Longitudinal studies that track changes in these policies over time could provide a deeper understanding of the dynamics and impacts of these policies. Countries can learn from each other's experiences and adapt their policies to better suit current challenges and opportunities. The study contributes to a more informed global dialogue on citizenship, human rights, and international cooperation. On the economic front, dual citizenship can have economic advantages and disadvantages for countries, affecting everything from foreign investment to labour markets. Understanding these can help countries to strategise their economic planning more effectively.

The following section explains how this thesis addresses these gaps. The theoretical framework includes factors which have been studied or mentioned in previous research that impact citizenship policy. Through testing them, this study can provide updates about whether those factors are still influencing the choice of citizenship policy or whether they indeed have an impact on the citizenship policy at all. The statistical analysis of all countries worldwide and the comparison of countries in the empirical analyses provide valuable insights into the diversity and complexity of citizenship policies worldwide. It enables the determination of the impact of factors on citizenship policy. The single case study enables this thesis to observe a dynamic change in citizenship policy over time and to better understand and discover possible causal relationships.

### **1.3 The Analytical Framework and Methodology**

This study aims to explain citizenship policies around the world: why some countries have dual citizenship policies, while others have single citizenship policies. More specifically, it aims to identify the factors associated with dual citizenship policies. The time frame is from 1945 to 2019. The starting point has been chosen because citizenship started to become an issue after the Second World War (1945), particularly with the UN's Universal Declaration of Human Rights. The analysis stops in 2019 because this is the pre-COVID world. The COVID-19 pandemic, which emerged in late 2019, has significantly impacted international movement, migration, and by extension, citizenship policies. The pandemic has led to numerous temporary measures, including border restrictions and emergency laws, which might not accurately reflect a country's underlying approach to dual or single citizenship. By ending the study before the pandemic in 2019, this thesis focusses on long-term trends and policies rather than the

anomalies introduced by this global health crisis. Based on the literature review, nine potential determinants of dual citizenship policy were identified. Respectively, these are physical capital, human capital, relations with neighbours, the country's image, regime type, political stability and governance, immigration levels, emigration levels, and colonisation experience. They provide the analytical framework for this study.

The study consists of two main parts: statistical analysis (including comparative analysis) and the single case study of Italy. The statistical analysis includes 195 cases and teases out the relationships between potential determinants and citizenship policy. It obtains general relationships in the big picture. The single case study contributes to an in-depth view of how those factors act in practice in a specific country context. It is possible to identify some of the causal effects between the factors and a dual citizenship policy. 195 cases are the 195 countries recognised by the United Nations, including 193 member states and 2 non-member observer states. A comprehensive national sample is conducive to accurate statistical analysis and makes the results more generalisable. Italy is selected as a representative case in the single case study because it is a country with a dual citizenship policy and matches the dominant trend worldwide, having changed from a single to a more tolerant and inclusive dual citizenship policy (Schierup et al., 2008; Schlenker et al., 2017).

The data gathered for this study encompasses both secondary and primary data sources. The primary data set employed in this study comprises parliamentary sessions, policies, legislation, reports, and official documents from governments of various countries. Secondary data means they are from existing sources which have already been collected by someone else in the past. The data may have been compiled into files for the purposes of other studies or reports. It was not deemed realistic to conduct interviews or focus groups on various countries to collect relevant first-hand information for this study because it is cross-country in nature. With regard to countries' chosen citizenship policies, this study refers to global citizen observatory to confirm what kind of citizenship policy the country has – a single, a conditional dual or a dual citizenship policy. Each of the nine potential determinants has its own measurement indicator. The data of these indicators broadly come from the relevant international organisations and transnational institutions, such as the World Bank, the Institute for Economics and Peace, the United Nations Population Division, The United Nations Human Rights Office of the High Commissioner, Freedom House, and the Pew Research Centre.

In the Italian case study, data on the above factors or indicators are also taken from the databases of the above-mentioned international organisations or transnational institutions. In addition, this thesis consults the official minutes of the Italian Parliament and the relevant bill (the proposal of the new law, as Italy changed to a dual citizenship policy based on Law no.91/1992) to observe and study Italy's move from a single to a more tolerant and inclusive dual citizenship policy. The present study examines the reasons for, and the factors associated with, Italy's transition from a single to a dual citizenship policy; it also considers the local Italian press, as well as academic journal articles and books.

In the quantitative analysis, the statistical analysis has citizenship policy as the dependent variable, with three values: a single citizenship policy, a conditional dual citizenship policy, or a dual citizenship policy. The nine potential determinants proposed are independent variables in the statistical analysis, together with five control variables: contagion effect, territory size, religious diversity, a country's ratification of International Human Rights Treaties, and having a multiparty political system. Based on the statistical relationship derived, the results are interpreted with the help of a qualitative comparative case study of two countries, one with a single citizenship policy and one with a dual citizenship policy, for each potential determinant. This helps to gain understanding of the country and explores the associations of individual factors with the chosen citizenship policy. The case analysis is based on the single case study of Italy. It discusses Italy in depth, including a detailed timeline and context. It identifies some causal effects between the factors and Italy's choice of a dual citizenship policy. This helps in gaining a deeper understanding of why some countries have dual citizenship policies (whiles others do not), and the possible reasons why they have shifted from their previous single citizenship policies to dual ones, adding nuances to the general associations obtained in the previous statistical results.

#### **1.4 Relevance of the Thesis**

This thesis makes a worthwhile contribution to the research on citizenship policy. It addresses the theoretical and empirical gaps identified above, as well as providing theoretical and empirical contributions and implications for broader issues in political science. The findings enriches the theory of the impact of international relations on citizenship policy by showing that good relations with neighbouring countries and a

positive country image favour the adoption of a dual citizenship policy (Castles et al., 2013; Faist, 2000a; Portes, 1997). The adoption of dual citizenship policies is facilitated by the existence of peaceful and friendly relations between countries. These policies are inherently sensitive, as they concern the movement of people and the opening of borders. It can be observed that countries that adhere to current global norms, such as respect for human and civil rights, are more likely to adopt more inclusive and tolerant dual citizenship policies. Furthermore, this thesis reveals the contagion effect of dual citizenship policies. The statistical analysis and case study of Italy demonstrate that contagion has an impact on the adoption of dual citizenship policies by countries, particularly given Italy's membership of the European Union.

In the meantime, the findings of this study support the historical institutionalism and the relationship between colonisation experience and citizenship policies. The previous colonial power would adopt a more inclusive dual citizenship policy in order to maintain contact with their own people overseas and to deal with mixed populations of different races in their own country (Amighetti & Nuti, 2016; F. Cooper, 2022; Escobar, 2004; Kivisto & Faist, 2009). However, they may also have the intention of "colonial expansion" (Tintori, 2006; O. Vonk, 2012). Even countries that have been colonised may wish to maintain contact with their citizens who have emigrated abroad as a result of their colonisation past. The adoption of dual citizenship policies is a recognition of the historical legacy of colonialism and its impact on the country.

In addition, the thesis broadens the scope of neoclassical economic theories of migration (de Haas et al., 2015; Hooghe et al., 2008) by investigating the impact of physical capital on citizenship policy. These theories suggest that wealthier countries which offer far greater opportunities will naturally attract immigrants (Borjas, 1989; Massey et al., 1993; Stark & Bloom, 1985), however, countries with lower levels of economic development may choose to adopt a dual citizenship policy on their own initiative as a social or political strategy, or even as a calculated economic move to attract immigrants and returned emigrants in order to promote their own national growth and development.

Regarding empirical contributions, this thesis suggests that rather than merely reflecting a country's history or identity, a dual citizenship policy can be a strategic tool used to pursue a variety of national goals and interests. Countries with low physical capital appear to adopt a dual citizenship policy (with increasing physical capital) for the purpose of economic development and increased competitiveness. Countries with a

good national image are likely to implement a dual citizenship policy as part of their commitment to humanitarian principles. Besides, these countries generally wish to achieve some of the ends that can be gained by adopting a dual citizenship policy. For example, an enhanced standing in the international community can potentially lead to benefits like higher foreign investment and stronger diplomatic relationships (Pattberg & Stripple, 2008). Countries that value diversity recognise the benefits it brings, such as fostering innovation, enhancing social development, and enriching the cultural fabric. By implementing dual citizenship policies, these countries can further attract diverse individuals and benefit from their unique perspectives and skills.

Also, this study employs a statistical analysis and cross-national comparative analysis to examine the citizenship policies of 195 countries. This provides an in-depth and diverse overview of the global approaches to citizenship. It builds a broad and diverse corpus of data, facilitating a rich comparative analysis of citizenship policies. This broad data set also provides a foundation for further academic inquiry and policymaking. Meanwhile, the quantitative and comparative study of citizenship policies can be used as a reference by future scholars. The focused examination of Italy's transition from a single to a dual citizenship policy adds a more nuanced and detailed dimension, showing the dynamics of how the factors (or some of them) the thesis has identified in the statistical analysis came into play to push or shape the policy. This helps to build a granular view of how various factors may contribute to such a policy shift. It suggests that some of the factors associated with the big picture of citizenship policy could subtly change in the context of individual countries, raising different strategic implications for specific countries.

Last but not least, the thesis supports the study of broader issues in political science, starting with migration networks. The variation in citizenship policy studied here, i.e., the choice by some countries to shift from single to more inclusive and tolerant dual citizenship, may influence transnational connections and the formation of communities. Then, at a regional level, understanding the variation in citizenship policy could provide insights into how changes in citizenship policy impact governance and resilience. At a more macro level, this study contributes to knowledge on the construction of identities in world society, and political socialisation. Variations in citizenship policy across the

world might influence actor identities<sup>3</sup> and the diffusion and adoption of models of actor agency and rights. The factors associated with single or dual citizenship policy could also influence political socialisation and the formation of political preferences.

### **1.5 Structure of the Thesis**

After this Introduction chapter, Chapter 2 defines citizenship to provide a strong basis for this study. It reviews mainstream and minimalist definitions of citizenship, differentiating it from nationality using a legal, political and ethnocultural prism. It briefly gives a chronological evolution of the concept of citizenship, including morality-based citizenship from ancient Greece and rights-based citizenship arising from modern bourgeois ideas. The chapter brings together numerous theoretical ideas and aligns them with the historical background to provide a holistic view. It outlines two intrinsic relationships and five derived aspects inside the minimalist definition, which are critical for comprehending citizenship theories and the definition presented in this thesis. It investigates theoretical ideas such as communitarianism, republicanism, ethno-symbolism, and post-transnationalism. Overall, this chapter lays the groundwork for examining single and dual citizenship policies in modern circumstances.

Chapter 3 narrows the focus down to citizenship policy. The chapter provides a definition and understanding of dual citizenship and dual citizenship policies, which covers the basic principles of determining citizenship, the reasons for the emergence of dual citizenship, and the various categories of dual citizenship policies. The chapter traces the historical evolution of these policies and maps out contemporary global practices. The chapter presents theoretical insights on dual citizenship, including nationalism, post-transnationalism, communitarianism, and republicanism, along with normative frameworks and policy consequences. These theories provide insight into how different countries balance national identity, global connection, and civic participation. Reflecting conflicts between national solidarity and diversified identities, the chapter emphasises several ways to achieve dual citizenship. In the end, the chapter

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<sup>3</sup> Dual citizenship policies might influence how individuals construct their own identities, by allowing them to identify with more than one nation-state. For instance, the study on citizenship policies shows how they can be used to shape the rights and responsibilities of children, influencing their identities as actors and their understanding of their agency and rights (Lister, 2007b). Having a sense of belonging to two nations can lead to a complex, multifaceted political identity in that dual citizens may feel a sense of loyalty and obligation towards both countries, which can influence their political behaviour. For example, they may be more likely to vote, engage in political discussions, and participate in political activism in both countries (de Wit, 2020).

emphasises the need to interact with several theoretical points of view in order to develop nuanced and effective citizenship policies in a world that is becoming more linked.

Chapter 4 establishes the analytical framework for this study. It begins by discussing the factors that may influence a country to adopt a dual citizenship policy, or to decide not to do so. Nine potential determinants of the dual citizenship policy are drawn from the literature: physical capital, human capital, relations with neighbours, the country's image, regime type, political stability and governance, immigration levels, emigration levels, and colonisation experience. For each of the potential determinants, this study develops a hypothesis. The following empirical inquiry tests all nine hypotheses. In the process of testing them five control variables are also included: contagion effect, territory size, religious diversity, ratification of International Human Rights Treaties, and the presence of a multiparty electoral system. Their inclusion in this thesis is to reduce the impact of omitted factors and to explore if these potential factors affect citizenship policy.

Chapter 5 describes the methodology of this study. This thesis designs a combination of quantitative and qualitative analyses to provide evidence by testing the nine hypotheses outlined in the analytical framework of Chapter 4. Quantitative analysis employs statistical tools, such as correlation and regression. The qualitative analysis includes a country comparison and a single case study of Italy. The sample in this study covers 195 countries, including 193 UN member states and 2 non-member observer states. The single-case study selected Italy as a representative case. This chapter also illustrates the study's time frame, variable measurements, and data source. The statistical analysis of all countries worldwide provides a broad overview of the general association between factors and the choice of a dual citizenship policy, while the single case study refines these general patterns and potentially uncovers causality.

Chapters 6 to 10 are empirical chapters that present quantitative (statistical analysis) and qualitative analysis (case studies). Chapters 6 and 7 first explore the statistical relationships between each independent (and control) variable and the dependent variable, dual citizenship policy. Correlation and regression tests are included in the statistical tests. Correlation tests explore the bivariate relationships between each factor and the chosen citizenship policy. The ordinal logistic regressions explore how factors or variables behave together to establish their multivariate relationships. Chapters 8 and 9 analyse each independent variable to determine the extent to which and how these

factors are associated with the chosen citizenship policy. These two chapters give an in-depth explanation of the factors in the hypotheses, one by one. Each section presents a qualitative comparative analysis of two countries, one with a single citizenship policy and one with a dual citizenship policy. These chapters compare countries to understand the practical application of these statistical numbers. Qualitative analysis aids in understanding and contextualising each country, as well as exploring the association of individual factors with its chosen citizenship policies. The statistical and comparative analysis reveals a strong association between the choice of citizenship policy and relations with neighbours. The colonial past still influences a country's decision to have a dual citizenship policy. Also, the national objective of pursuing economic development and observing global norms (i.e., respect for human and civil rights) play relevant roles in a country's decision to have a dual citizenship policy.

Chapter 10 presents a single case study of Italy. By analysing the case of Italy, we can see what factors played a role in the change from a single to a dual citizenship policy in Italy and whether the statistical relationships are also valid for the case of Italy. The background and process of adopting Italy's 1992 citizenship legislation, which introduced a dual citizenship policy, set the stage for this chapter. After that, the chapter discusses the factors that made a difference in Italy's shift to a dual citizenship policy. The study finds that Italy's desire to maintain ties with its emigrants and preserve Italian descent has been the main support for the adoption of the dual citizenship policy, which is a form of nationalist sentimentalism. In addition, Italy's relations with neighbouring countries, especially the fact that Italy is a member of the European Union, have also contributed to its dual citizenship policy. The Italian dual citizenship policy seems to be *de facto* "conditional," as it favours co-ethnics and does not value immigrants. The chapter concludes that Italy's political regime and party consciousness have led to and maintained this situation. The Italian overseas constituencies may even strengthen the preference or "conditional" nature of Italy's dual citizenship policy.

Chapter 11 summarises the main findings of this thesis, as well as its theoretical and empirical contributions. As countries become more interconnected and globalisation increases, external factors in citizenship policies become more important than internal factors. Nevertheless, internal factors, such as a country's historical legacy and its aspirations, still play a role in citizenship policies. Several hypotheses are supported: good relations with neighbours favour a country adopting a dual citizenship policy. Countries with colonial or colonised experience are more likely to have a dual



citizenship policy. Moreover, pursuing national economic development and adhering to global norms, such as respect for human and civil rights, can influence a country's more tolerant and inclusive citizenship policy. The chapter also explains the implications for broader political science issues, highlighting transnationalism and migration networks, governance and resilience, and identity construction. Finally, the chapter considers the limitations of the thesis and concludes with some suggestions for further research on the topic.

## **CHAPTER 2**

### **THE DEFINITION AND EVOLUTION OF CITIZENSHIP**

The purpose of this chapter is to first define citizenship. There are several reasons for including a chapter on the definition of citizenship in this study. Firstly, it provides a basis for discussion. Citizenship as a concept is fundamental to this study. Defining it clearly sets the stage for everything that follows and ensures that readers have a clear understanding of what exactly this thesis is investigating. Secondly, different studies, jurisdictions, or disciplines may have slightly different interpretations of what “citizenship” entails. By defining it, the thesis ensures that the audience understands the concept in the same way as this thesis does. Having a chapter that defines key terms, including citizenship, helps to maintain this consistency throughout the study. Thirdly, a look at the historical evolution of the concept of citizenship and integrating theoretical perspectives into citizenship understanding can provide a valuable context for the main discussion in this study on the factors associated with single or dual citizenship policies.

Section 2.1 discusses several mainstream understandings of citizenship before explaining the “minimalist definition” of citizenship for the purposes of this thesis. After that, the section clarifies the distinction between citizenship and nationality, addressing the legal-political and ethno-cultural dimensions of these concepts. This distinction is critical for understanding the basis of citizenship policies, especially in contexts involving dual citizenship. Section 2.2 briefly reviews the chronological development of citizenship, including the morality-based citizenship of ancient Greece and the rights-based citizenship that emerged from modern bourgeois ideas. Section 2.3 integrates theoretical perspectives into citizenship understanding. By aligning specific theoretical perspectives with the concepts and historical overview already introduced, it facilitates a comprehensive examination of citizenship, from its basic definitions and historical evolution to the contemporary theoretical debates shaping our understanding of citizenship policies today.

#### **2.1 Introduction to Citizenship and Its Core Definition**

Before studying the citizenship policy, this thesis needs a clear definition of citizenship first. Defining the concept of citizenship has been a controversial matter in academia. Over-interpretation of the concept of citizenship risks “conceptual stretching” (Sartori,

1987). In Marshall's view, citizenship refers to the membership owned by people of the political community; those who have the membership enjoy equal rights and assume corresponding obligations (Cole, 1951). Turner (1993, p. 2) defines citizenship as a collection of practices through which people acquire the ability to become members of society and to shape the flow of resources between individuals and social groups accordingly. In his opinion, the term citizenship essentially refers to “the nature of social membership in the modern political community” (Turner, 1993, p. 3). Along the same lines as Marshall, Australian academic Pakulski, who also focuses on the right to citizenship, encourages a culture of citizenship rights, and understands citizenship as a membership that maintains those rights which can be enjoyed by members of the entire political community (Pakulski, 1997). Isin (2008, pp. 15-43) more recently interpreted citizenship as the identity of a citizen who carries out a variety of concrete actions to compete for and exercise various rights. Thus, the concept of citizenship is clearly controversial. Many scholars believe that citizenship is an eternally changing concept (Hoffman, 2004); and Janowitz (1980, p. 1) concluded that understanding “citizenship” requires continuous research by people from all perspectives of the term, including its concept, philosophy, values, and so forth, continuously expanding and deepening its implications.

Almost every scholar has defined citizenship differently from the others. Citizenship has gradually become an “omnipotent” concept with ambiguous connotations and a broad extension. Faced with the array of various complicated definitions, Riley (1993, p. 180) stated that citizenship is a “slippery concept”, and many scholars have agreed that arriving at an unquestioned definition of citizenship is almost impossible (Lister, 1997, p. 28; Riley, 1992; Allen, Braham and Lewis, 1992). Secondly, because of the uncertainty of the concept of citizenship per se, citizenship theory seems to have become an all-encompassing and borderless theory – as any research on the relationship between citizens and political communities, and on the relationships between individual citizens, can be placed within the research framework of citizenship (Isin and Turner, 2008; Heater, 2004).

### 2.1.1 Mainstream and other understandings of citizenship

This thesis will look at the existing literature on the definition of citizenship in order to collate and sort the definition of citizenship. Numerous interpretations of the term “citizenship” exist. Broadly speaking, “qualification” (“qualified” citizenship), “rights”

“rights” citizenship) and “action” (acted citizenship) are three mainstream ways to understand the concept of citizenship. The “qualification” (“qualified” citizenship) form understands citizenship as a formal qualification established by a Constitution and relevant legislation and given to members by the political community (Oldfield, Turner and Hamilton, 1994, pp. 177–187; Archibugi, 2008; Agra, 2012, pp. 117-125; Zarrow, 1997). Such a definition is usually accompanied by two other elements of citizenship, namely rights and the equality principle. Citizenship, as a legal and formal membership in a political community, is the most powerful weapon that citizens demand from the state in order to provide and guarantee their basic rights (Agra, 2012, pp. 117-125; Zarrow, 1997). Furthermore, the rights granted to citizens by the state are equally and universally enjoyed by all citizens with membership (Oldfield, Turner and Hamilton, 1994, pp. 177–187; Agra, 2012, pp. 117-125; Zarrow, 1997).

The second form is rights-based (“rights” citizenship). Compared with the “qualification” understanding, the “rights-based citizenship” understanding more clearly and directly contends that the most important connotation of citizenship lies in the various rights it maintains. Understanding citizenship as associated with the rights of a citizen is the most common way to define citizenship in contemporary research. British sociologist Marshall was the pioneer of the discourse system of citizenship rights (Lister, 2007a, p. 29). He described the historical evolution of British citizenship rights from civil rights to political and social rights. Marshall's theory of rights was later developed and criticised by other scholars, who eventually produced comprehensive theoretical and analysis frameworks (Pakulski, 1997; B. S. Turner, 1986, 1990, 1995).

Generally speaking, the new developments based on Marshall can be categorised into two pathways. The first pathway explores the source of citizens' rights vertically through history, asking if the rights of citizens are a top-down ruling strategy of the ruling class or the result of the bottom-up struggle of civil society (Turner, 1986; Mann, 1987, pp. 189-214; Knott, 2018). The second pathway has analysed civil rights at a horizontal level to establish if other factors exist in addition to the three elements of “civics, politics and society” such as culture, which have influenced the understanding of citizenship (Pakulski, 1997, pp. 73–86; Seligman et al., 2000; B. S. Turner, 1993).

The third understanding of citizenship is based on action. “Acted” citizenship means that citizenship should not be understood only as a static legal status or a series of citizenship rights provided to citizens by the state but should be understood as citizens practising the legal rights they possess through concrete actions. In this view,

the dynamic process of citizenship expansion and deepening is promoted (Taylor, Turner and Hamilton, 1994; Heater, 2004). The “action” (citizenship) understanding has been developed based on critical comment both on “qualification” (“qualified” citizenship) and “rights” (“right” citizenship) understandings, by advocating that the research perspective should be shifted from the state to citizens. Furthermore, the “action” understanding makes the criticisms that, firstly, both “qualification” and “rights” understandings assume that once an individual is given the membership of “citizen”, he or she will naturally and substantially become a qualified citizen (Oldfield et al., 1994, pp. 177–187); and secondly, that once qualification is granted and rights are provided, all citizens have universal and equal abilities to recognise, understand, and practice the qualification and rights (Oldfield et al., 1994, pp. 177–187).

There are many other interpretations of citizenship. For example, Kiwan (2005, p. 38) divides the concept of citizenship into moral, legal, identity-based, participatory, and cosmopolitan citizenship. Waltz (2008) was first to distinguish between the concepts of “thin” and “deep” citizenship. In general, the concept of “thin” citizenship is what Kiwan calls the concept of “moral” and “legal” citizenship, while “deep” refers to identity-based, participatory, and cosmopolitan citizenship, listed by Kiwan as the last three citizenship concepts. From these complex classifications, we can clearly see the diversity of, and confusion regarding, the different understandings of citizenship.

Sim made a very fair and accurate evaluation of the concept of citizenship. He believes that citizenship is a “contextual” concept. The so-called “contextuality”, that is, the content of citizenship and its meaning, may change at any time according to social, political, and cultural contexts (Sim, 2001 cited in Isin and Turner, 2002, pp. 47-55). The “contextual” feature of citizenship subjects the definition of citizenship to conceptual stretching. Scholars who pay attention to different empirical phenomena incorporate their concerns into the concept and theoretical system of citizenship, and try to interpret citizenship as deeply as possible (Beiner, 1998, pp. 29-54; Hansen and Koehler, 2005, pp. 72–79). However, the direct consequence of this research situation is that the concept of citizenship has become an all-encompassing, “almighty” concept - it no longer has a clear conceptual boundary or defined connotations (Xia, 2013, pp. 72-79; Wong and Kim, 2014); the conceptual connotations of citizenship can either expand or reduce, stretching at any time as circumstances change.

### 2.1.2 The “minimalist definition” of citizenship

The ambiguity of its conceptual connotations and the arbitrary stretching of citizenship's meaning mean that the term "citizenship" has limited explanatory power (Side, 2006; Wong and Kim, 2014). Researchers who attempt to use the concept of citizenship for empirical analysis face difficulties in persuading others that they should use the concept of "citizenship" rather than others. This is partly due to the ambiguity of the concept of citizenship, and partly because the theoretical system of citizenship research presents a contention and lacks systematic integration (Xia, 2013, pp. 72–79). Researchers are mostly at the stage of gathering empirical examples and enriching the contexts and types of citizenship today. Simply by reading recent research on citizenship, we can easily note that on many occasions, citizenship is prefixed with an adjective or noun to express new concepts such as "democratic citizenship", "close citizenship", "cultural citizenship", "multicultural citizenship", "gender citizenship", "transgender citizenship", "consumer citizenship", "global citizenship", "cosmopolitan citizenship", "environmental citizenship", and more (Archibugi, 2008; Balta & Altan-Olcay, 2016; Dobson, 2003; Harpaz, 2015). These new concepts do not exist on the same theoretical analysis platform, and there is little dialogue between them (Xia, 2013, pp. 72–79).

In order to avoid an increasingly cryptic trap in understanding citizenship in research, this sub-section attempts to clarify the "contextual factors" at play in each understanding and the "conceptual connotations" shared among various understandings of citizenship. Only in this way can we find the stable core of the concept of citizenship without getting lost in various complex interpretations and definitions. This approach to defining citizenship was inspired by Schumpeter (1951, cited in Heertje, 1989, pp. 50-54), who classically defined "democracy" – another rich concept in political science, with a "minimalist definition" which has been praised as simple, elegant, and parsimonious, thus making the concept of "democracy" clearer and more able to distinguish political systems that either fulfil or fail to fulfil certain characteristics (Barany and Moser, 2001). This thesis expresses the core meaning of citizenship or its basic concept as a "minimalist definition". The "minimalist definition" of citizenship is a reflection of an individual's political membership in the political community (Lister, 1997, pp. 28–48; Lister, 2003).

This "minimalist" definition of the concept of citizenship contains two sets of inherent relationships and five derived elements. The two sets of inherent relationships indicate the relationship between individual citizens and political communities, and the

relationship between individual citizens (Archibugi, 2008; Oldfield et al., 1994, pp. 177–187; van der Ploeg & Guérin, 2016). The five derived elements refer to the “substantive elements”, “procedure elements”, “normative elements”, “emotional elements”, and “paradoxical elements” which are all embodied in the concept of citizenship (Taylor, Turner and Hamilton, 1994, pp. 177–187; Isin and Turner, 2002; Archibugi, 2008; van der Ploeg and Guérin, 2016). The so-called “substantive elements” are the contents of civil rights and obligations that are directly linked to the political membership conferred by citizenship (Oldfield et al., 1994, pp. 177–187).

The so-called “procedural elements” refer to the historical processes of how the rights and obligations, as the content of “substantial elements”, have been determined; what kind(s) of political procedures guarantee them; and through which political, economic, and social processes they are implemented (Taylor, Turner and Hamilton, 1994; Archibugi, 2008). Modern governments employ laws and policies to regulate citizenship, which provide the methods by which individuals can obtain, maintain, or forfeit their citizenship. These laws are crucial for establishing an individual's legal standing within a state, encompassing their entitlements, obligations, and qualifications for different public services and political involvement (Shachar, 2009; Shachar et al., 2017). The so-called “normative elements”, that is, those which exist on a moral and normative level, consider whether citizens should only exist as passive rights holders who are independent of other individuals and defended against the political community, or be active actors who will constantly participate in public affairs and efforts to build a better community, as their destiny is closely tied up with the welfare of others and the community (Isin & Turner, 2002). The normative element of citizenship reflects people's understanding of the two main subjects of citizenship – “citizens” and the “political community”, and the relationship between them (Isin & Turner, 2002). The “emotional elements” refer to citizens' sense of belonging to, and approval of, the political community. These emotions come from citizens' utilitarian feedback on the rights given to the community, and can also be a sincere feeling built during participation in the construction of the community towards the community itself, and other members of the community (Isin & Turner, 2002; van der Ploeg & Guérin, 2016).

The “paradoxical elements” are inherently embodied in the concept of citizenship. These inherent “paradoxical elements” refer to the tension brought about by the two contradictory factors of “inclusiveness or tolerance” and “exclusion” that coexist in the concept (Archibugi, 2008; van der Ploeg & Guérin, 2016). Basically, this inherent

conceptual paradox of citizenship presents in two ways. First, the “inclusiveness” existing within the boundary leads to “exclusion” outside the boundary of the political community (Archibugi, 2008; van der Ploeg & Guérin, 2016). The political community in citizenship always implicitly or explicitly defined by the existence of a certain boundary (the most mainstream understanding equates this boundary with the geographic boundary of a nation-state), and all the values that humanity pursues, such as equality and justice, which are reflected in citizenship are only valid within this range. Beyond this range, tolerance for a group of people may mean the exclusion of other groups (Archibugi, 2008; Kim, 2019; van der Ploeg & Guérin, 2016). The principle of equality could also go in the opposite direction and even reinforce differences, resulting in actual inequality (Archibugi, 2008; Harpaz, 2015).

Scholars use different understandings of citizenship to serve the high demands of different theoretical developments. Since contextual factors are usually related to specific theoretical arguments, scholars who work on different theoretical backgrounds selectively incorporate certain contextual factors into their specific understanding of citizenship (Archibugi, 2008). Therefore, in many cases, scholars have used the concept of “citizenship” but discussed completely different things from each other (Archibugi, 2008; Hobson, 2013, pp. 72–79; Lister, 2003). This phenomenon means that many conceptualisations and theoretical discussions of citizenship lack an effective dialogue platform, leading to concepts of citizenship developed in completely different theoretical contexts being confused or confusingly used by researchers, and bringing about unnecessary disputes.

#### *The working definition “citizenship” in this thesis*

Overall, in order to overcome the issue of “conceptual stretching” faced by the concept of citizenship, this thesis distinguishes contextual factors in the concept of citizenship from the core of its meaning. The core of the meaning, that is, the meaning of the concept that is clear and stable, cannot be modified in different topics or contexts. This thesis calls such definition the “minimalist definition”, following Schumpeter’s (1951, cited in Heertje, 1989: 50-54) definition of the concept of “democracy”.

The minimalist definition of citizenship deployed in this thesis is “an individual’s political membership in the political community”. As has been demonstrated, the definition suggests two inherent relationships: the relationship between citizens and political communities, and the relationship between individual citizens, as well as



relating to five derived elements, which are the substantive elements, procedural elements, normative elements, emotional elements, and paradoxical elements respectively. Many existing definitions of citizenship are largely re-interpreting two inherent relationships and connecting to different derived elements to different degrees.

Taking citizen-to-citizen relations as an example (one inherent relationship within the concept of citizenship), “right” interpretation or “right” citizenship focuses on individual citizen as an analysis unit; the citizen is a completely independent individual. In contrast, the “action” interpretation or “acted” citizenship places the individual citizen in a complex social environment in which they are not completely independent, but a “social person”, born with an inseparable, close relationship with other individuals. In the relationship between citizens and political communities, the “qualification” interpretation or “qualification” citizenship adopts a top-down perspective, based on the belief that the membership of “citizens” is a unilateral grant or even a gift to citizens by the political community. On the contrary, “action” interpretation pays more attention to the struggle and practice of citizens for qualifications or rights from the bottom up.

In addition to these two sets of inherent relationships, the minimalist definition of citizenship also relates to five derived elements, which can be considered as five different dimensions through which to understand the concept of citizenship or to construct the theory of citizenship. Many schools in contemporary citizenship research are developed in one or more dimensions, in that they have connected to different derived elements, but what is worth mentioning is that these five derived elements of citizenship do not necessarily exist at the same time. They can each develop to different degrees depending on the specific needs of the theoretical analysis at hand. In short, the “minimalist definition” of citizenship in this paper is that citizenship is a reflection of an individual's political membership in the political community (Lister, 1997, pp. 24–48; Lister, 2003). The alternative definitions of citizenship are mainly re-interpretations of the inherent relations which fall under the “minimalist definition”.

### 2.1.3 “Citizenship” vs. “nationality”

This sub-section distinguishes citizenship and nationality, addressing the legal-political and ethno-cultural dimensions of these concepts. This distinction is critical for understanding the basis of citizenship policies, especially in contexts involving dual citizenship. The section begins with a clear definition of nationality to distinguish it from "citizenship" as defined in the previous section. Examples of their different uses

are given. Finally, this section explains why they are sometimes mistakenly used as synonyms.

### *“Nationality”*

Nationality implies the place or country in which a person has been born (Cesarani & Fulbrook, 1996; Greenfeld & Oommen, 1997; Hansen & Weil, 2001). Nationality is acquired by inheritance from parents - this is called a “natural phenomenon” (Cesarani & Fulbrook, 1996; “Nationality and Statelessness under International Law,” 2014). A person’s nationality can also be acquired and changed when they apply to be a naturalised citizen of another state. This only happens when that nation’s framework has accepted the individual (Faist & Kivisto, 2007; “Nationality and Statelessness under International Law,” 2014). International Law legally supports that “everyone has the right to a nationality”, and “no one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality” (UN Universal Declaration of Human Rights, 1948: 12-18).

Many international laws and treaties have attempted to define the “nationality” of a natural person. The European Convention on Nationality Article 2(a) (1997: 2) has defined that “nationality is a legal bond between individual and state”. The Law of Nationality (Harvard Convention) Article 1 (a) (1929: 3) also stated that “nationality is the status of a natural person who is attached to a state by the tie of allegiance”. Based on the different definitions present in international treaties and policies, some scholars have proposed that different definitions of nationality appear in international laws, because these definitions focus on different functions of nationality (Hansen and Koehler, 2005, pp. 623–644; Sloane, 2009; Pehrson and Green, 2010, pp. 695–716; Yen-fen and Wu, 2011); thus, the "function theory" of nationality has emerged and received a lot of support (Boulden & Kymlicka, 2015; López-Alves, 2015, pp. 169–185; Martill & Staiger, 2018). Sloane (2009, p. 4) argued that contemporary international law should directly analyse and plan the concept of nationality through the different functions of nationality, in order to better realise the role of nationality in different environments. Wu (2011, pp. 265-282) furthermore adds that the function of nationality is reflected in the effect of its international law; for example, nationality is a condition for a state in diplomatic protection or in the protection of an international investment treaty resource to international law (Wu, 2011, pp. 265-282; López-Alves, 2015, pp. 169–185). Nationality is also a prerequisite for the jurisdiction of the

International Court of Justice and arbitration tribunals in related cases (Wu, 2011, pp. 265-282).

The right of a state to grant nationality comes directly from its sovereignty. In consonance with the principle of sovereign equality, unless the state restricts its rights by signing a treaty, it enjoys full sovereign rights to grant nationality (Boulden & Kymlicka, 2015; Hansen & Koehler, 2005, pp. 623–644). According to the "function theory" of nationality, even if a country grants nationality in a way that violates international law – such as a natural person acquiring nationality by bribery – the nationality of the country is still valid as long as it meets the country's provisions as set out in its domestic legislation or policies (Hansen and Koehler, 2005, pp. 623–644; Sloane, 2009). Yet, on the other hand, in the context of international law, because such granting of nationality violates the basic principles of international law, it cannot function as nationality at the international level (Boulden & Kymlicka, 2015; “Nationality and Statelessness under International Law,” 2014); specifically, a country cannot exercise its diplomatic protection based on nationality granted in violation of international law.

International law acknowledges the granting of nationality by a country's own recognition criteria. This principle was confirmed as early as the Permanent Court of International Justice in the *Tunis and Morocco* case in 1921 (Greenfeld & Oommen, 1997; “Nationality and Statelessness under International Law,” 2014). For the granting of nationality of a natural person, countries generally adopt three typical methods: (1) descent definition (*jus sanguinis*), which refers to the granting of nationality to a natural person based on the nationality of their parents or one of their parents; (2) birthplace doctrine (*jus soli*), which refers to the granting of nationality to a natural person based on their place of birth; and (3) naturalisation, which refers to the granting of nationality to a natural person based on procedures under a country's domestic law, according to the free will of that natural person (Oommen, 1997; Edwards and Waas, 2014). When nationality was granted by naturalisation, some countries require the person to have economic or social connections with the state, while others do not (Hansen and Weil, 2001; Edwards and Van Waas, 2014). Nevertheless, the above three methods of granting nationality are not customary international law, because the state does not grant citizenship through these methods for the purpose of fulfilling its obligations under international law (*opinio juris*) (Boulden & Kymlicka, 2015). Countries can

freely choose other ways to grant nationality to persons. The definition of "nationality" in international law seems to be analogous to the concept of "citizenship".

In academia, most scholars define the concept of nationality by focusing on descent and ethnic aspects, which in most cases are determined by the birth state (Greenfeld and Oommen, 1997; Agra, 2001; Vertovec and Cohen, 2002; Schattle, 2012; Edwards and Van Waas, 2014). Agra (2001 cited in Kim, 2018, pp. 97-109) suggested that nationality is the status of belonging to a particular nation, and the nationality of a person is their place of birth. Basically, nationality is an ethnic and racial concept; it cannot be changed, while citizenship can (Kim, 2019). Vertovec and Cohen (2002) also argued that nationality relates to a group of people of the same race, religion, and traditions. Nationality is acquired by birth, adoption, marriage, or descent, where the specifics vary from country to country (Vertovec and Cohen, 2002). Furthermore, Prabhat (2018) concluded that having a nationality is crucial for receiving full recognition under international law. Article 15 of the Universal Declaration of Human Rights declares that "everyone has the right to a nationality" and "no one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality" (United Nations General Assembly, 1948), but the same declaration is silent on citizenship.

The interpretation of "nationality" focusing on ethnicity and descent has, however, also received criticism. "Ethnicity" and "descent" are two key factors in the definition of nationality. Since ethnicity and descent are highly correlated to birthplace, and both factors are nearly impossible to change (Cesarani and Fulbrook, 1996; Agra, 2001; Kim, 2018), it has been claimed that nationality cannot be changed, as "nationality is the state of birthplace" defined. Yet, it is worth mentioning that birthplace is also an independent factor to determine nationality. With the increasing globalisation phenomenon, many children are being born in countries different from those where their parents were born. Their parents may not be living there, and they may have neither descent or the ethnicity of this country, but after the child's birth, the family will move back to parents' country of birth, as in many cases in the United States of America (Archibugi, 2008; Harpaz, 2015; "Nationality and Statelessness under International Law," 2014). In this case, it is difficult to claim that the birth country of this child is the child's nationality. Indeed, it makes the arguments that "nationality is an ethnic and racial concept" and that "nationality is the birthplace or country" paradoxical.

When comparing the notion of "citizenship" to "nationality", it becomes evident that nationality places greater emphasis on a person's ethnicity, lineage, and country. These traits have a strong correlation with birthplace. However, due to the significant impact of globalisation, many individuals may have a birthplace that differs from their ancestral location or their parents' nation (Archibugi, 2008; Harpaz, 2015; López-Alves, 2015, pp. 169–185).

*Using “citizenship” and “nationality” differentially or interchangeably*

Compared with nationality, it has been argued that citizenship is a narrower concept (Greenfeld and Oommen, 1997; Zarrow, 1997; Schierup, Castles and Hansen, 2008; Kim, 2018). In contrast to nationality, citizenship is an individual's political membership in the political community. Modern sovereign states typically establish and define political membership through legal means (Nolan & Rubenstein, 2009; Shachar et al., 2017). Citizenship establishes a distinct legal connection between a state and an individual, granting that individual unique rights and obligations (Archibugi, 2008; Greenfeld & Oommen, 1997; Pakulski, 1997). It also does not necessarily have to accompany nationality (Zarrow, 1997). In some Latin American states such as Mexico, for example, an individual obtains nationality at birth, but he or she will receive citizenship only upon turning 18 (Faist & Kivisto, 2007). In such a case, Mexican children are regarded as “nationals” but not as citizens, until they are 18 (Faist & Kivisto, 2007). The stated "specific legal relationship" there is similar to the concept proposed by scholars above; whether following the “formal and legal status” in a political institution, or the “judicial and legal” concept, it can be seen that the definition of citizenship stresses that the status or relationship is formal, legal, and judicial, especially within the spheres of legislation and politics.

However, with the increase in social diversity, the concept of citizenship can also be argued to be “more various” than nationality since it has gained more implications from different theoretical perspectives. The representative of an early maritime-based civilisation – the ancient Greek civilisation – gave birth to the concept of citizenship (Gu, 2002, pp. 44–49). Marshall (1950), as a theoretical pioneer of modern citizenship, expounded on citizenship from the perspective of three aspects – civil, political, and social rights, to explain the content of identity and the interrelationship between rights. His classic framework of three rights of citizenship has become a template for later studies of citizenship, which were especially of relevance to the construction of the

modern welfare state. In contrast, Bauböck (1994) argued that states are not, strictly speaking, membership groups because they are constituted by the very rights they establish for their members. Liberal democracies constrain their discretion in allocating citizenship by the norm that social membership should be fully represented in the polity. To a large extent, human rights is an extended form of transnational citizenship; in other words, that citizenship is a basic human right implies access to a set of universal human rights (Bauböck, 1994, pp. 235–247).

In most cases, as the definitions of “citizenship” and “nationality” are different, they are used differentially in practice. The most evident way in which citizenship and nationality differ is naturalisation through immigration. In this situation, an individual may be required to renounce their previous citizenship(s), depending on the legislation of both the original and receiving countries (Zarrow and Fogel, 1997). Nevertheless, this does not mean that they have to renounce their previous nationalities as well (Zarrow and Fogel, 1997; Mass, 2007). For example, an immigrant with Italian roots arriving in the United States may apply for and receive American citizenship. However, it is unlikely that he or she would then say they are no longer “Italian” in any sense (Mass, 2007). Another difficult case is that a person moving from Germany to the United States could apply for and acquire American citizenship, whereas it is still unlikely that she or he would then say they were no longer “German” in any sense, despite the fact that in most situations Germany requires its emigrants to renounce their German citizenship before adopting the new one (Heater, 2004).

Multinational states provide another scenario. Most countries around the world are not single-nation in terms of their populations. Even when the country is alleged to be a nation-state, such as Japan, it has some members of other nations inside the country - for example, there are indigenous ethnic Ryukyus in the south of Japan; Koreans, Chinese, Filipinos, Brazilians as well as some Western ethnic groups in the prefectures; and indigenous Ainu, some Manchu-Tungus, ancient Siberian ethnic groups in Hokkaido, etc., but in general, Japan is still regarded as a nation-state because the proportion of other nations is lower than 5% (Liang and Liu, 2009; Kim, 2018). In Canada and the United Kingdom, many citizens see those countries as their respective nations (Brooks, 2016). However, a great number of people do not, or at least, they have no single national identity (*ibid.*). Furthermore, many English, Scottish, Welsh, Irish, Northern Irish, Québécois, Aboriginal peoples, and Acadians see those groups as their nations, even though some may also identify with the state or the nation associated

with it (Brooks, 2016; Beaven and Griffiths, 2019, pp. 203-225).

In the legal sphere, the term “citizenship” is usually given priority as it is easier to determine than the “nationality” in most circumstances due to its legal status (Cesarani and Fulbrook, 1996; Gross, 1999). “Nationality” should be listed only in addition to “citizenship”, and only in cases where it is verifiable and relevant to the theme (Gross, 1999). For political purposes, the terms “citizenship” and “nationality” are sometimes used interchangeably, although there are differences between the two. The most common case of conflation of the two terms in daily life is that the state often adopts the term “nationality” to express the meaning of “citizenship”, such as in the Nationality Law (Greenfeld & Oommen, 1997; Isin & Turner, 2002). The Indian nationality law is called the Citizenship Act 1955. The main reason for such usual practice is because most countries assume that they are supposed to be “nation-states”. That is, the boundaries of the nation and the state coincide. The distinction will therefore be unnecessary since all citizens are also nationals (Isin & Turner, 2002).

Nevertheless most countries are not true “nation-states”. Instead, the majority of contemporary states are multi-national (Kim, 2018). It has been calculated that fewer than 10% can be accurately described as nation-states (Liang and Liu, 2009; Kim, 2018). Although many countries still see themselves as “nation-states”, it could be that the majority of the people in a country belong to a single nation, and that therefore, it meets the requirement of being defined as a nation-state, such as Japan, where the proportion of “other-nation” residents is lower than 5% (Kim, 2019). Or, the political legitimacy that nation-statehood is thought to provide may be important; in this case, the circumstances could be more complex (Liang & Liu, 2009, pp. 221–232). Connor (1994) and Cassese (1995) summarised that there might be a rising importance of norms of democratic governance and national self-determination in both domestic and “international” politics since at least the Treaty of Versailles that ended the First World War. The reason why the term “international” is in quote marks here is because it, and organisational names like the League of Nations and the United Nations are themselves misnomers that perpetuate the ambiguity between states and nations. The correct (if unconventional) term in this case is “interstate”(Connor, 1994, pp. 87-99).

Overall, although the terms “citizenship” and “nationality” are sometimes used interchangeably, they differ in important ways. As was discussed here, nationality is a term used to state a person's ethnicity or country of birth, whereas citizenship focuses on the legal aspect that must be obtained through a legal procedure. One is acquired by

birth and the other is acquired by law. In most cases, people can be only a national of one country or region, whereas they can possess multiple citizenships of various countries.

## **2.2 Historical Evolution of Citizenship**

Many scholars believe that citizenship is a modern concept that was established after the Industrial Revolution, which originated from the French Revolution and the American Revolutionary War (Heater, 2004; Hosking, 2005; Schierup, Castles and Hansen, 2008). This view highlights the modern implications of equality, individual rights, and freedom in citizenship. However, citizenship, as a concept directly related to human beings, has a history as long as human history.

A systematic review of the historical evolution of citizenship can provide a valuable context for the main discussion in this thesis on the factors associated with single or dual citizenship policies. The following two sub-sections provide a chronological evolution of citizenship.

### **2.2.1 Morality-based citizenship from ancient Greece**

The word “citizen” in ancient Greece originated from “polis”, which originally meant “people belonging to a city” (Constant, 2017). At the relationship level, citizenship of ancient Greece was generally characterised by two traits: attribution or belongingness, and participation (Constant, 2017; Gu, 2002, pp. 44–49). In practice, the attribution of ancient Greek citizenship mainly referred to the citizen's sense of belonging to the city-state and the city-state's requirement of citizenship. In the ancient Greek city-state, the citizens' ownership of the city-state originated from the blood-bounded “rights” preserved by tribal members during the evolution from tribe to city-state (Constant, 2017; Gu, 2002, pp. 44–49). Before the formation of the city-state, the blood relationship between the tribal members was considered sacred. The line between kinship tribes and outsiders is very strict.

People of the same kinship group often consider themselves a “natural whole”. A strict and insurmountable boundary is formed between the tribe and outsiders, which gives the tribe members a sense of belonging and integration. After the city-state was born, it gradually evolved into a community of citizens (Constant, 2017; Gu, 2002; Sartori, 1987). Only citizens belonged to a city-state, and obtaining citizenship meant being part of the city-state. Residents without citizenship lived in the city-state, but did



not belong to the city-state. Gentiles were considered diasporas or guests, and women and slaves belonged only to family members. In the minds of ancient Greek citizens, citizenship did not relate to what you own, but what you share, much like being a member of a family (Sabine, 1973, cited in Thorson, 2001, p. 35).

The feeling of belonging to a city-state was extremely important. If a person was deprived of citizenship, then they were deprived of their spiritual life, which was a severe punishment second only to the death penalty (Gu, 2008, pp. 82–94). The city state's claim to citizenship was most evident in Sparta regarding the feeling of belongingness. Sparta's citizenship was developed in the context of war and the fear of rebellion (Gu, 2008, pp. 82–94). The “military communism” style of management provided food and land for the survival of citizens, and in return, citizens provided their blood and life for the security of city-state (Gu, 2009, pp. 103–132). Such a thorough exchange meant that Spartans lacked any personal interest orientation that interfered with the public interest, and citizens with full citizenship enjoyed absolute social equality. However, this equality was obtained only when the citizens physically and mentally belonged to the city-state (Gu, 2009, pp. 103–132). In ancient Greece, a common phenomenon was that man was never explicitly identified as an individual or “self in private life” (Sartori, 1987, p. 289), and the individual was in some way engulfed in the state, the citizen in the city (Constant, 2017, p. 28).

Participation in ancient citizenship also manifested in two aspects, namely political participation in city-state affairs and the sharing of city-state property. In ancient Greece, citizens were fully integrated into city-states, and city-states were also owned by the citizens (Sabine, 1973). The main symbol of citizenship was that citizens enjoyed the political right to participate in the city-state's public affairs, as the member of a city-state civic autonomous group. The collective discussion engaged in by citizens decided all major matters in a city-state (Sabine, 1973; Sartori, 1987). Furthermore, participation in city-state affairs was not only a citizen's right but also a duty that citizens were obliged to fulfil. The fulfilment of this obligation was full of moral meaning - it was not for personal gain, but for the “beauty” and “nobility” of the city (Constant, 2017). Besides their political rights, the citizens of a city-state also enjoyed basic welfare rights, such as land and grain distribution (Constant, 2017; Sartori, 1987).

The public and political spheres were unified in the social life of ancient Greece (LI, 2006, pp. 72–79). Moral supremacy and duty coming first are typical characteristics of classical citizenship. Such characteristics are manifested in the

community's responsibility to its members, in which members of the community exhibit civic virtues such as selfless dedication, self-discipline, innocence, piety, and patriotism. Although with the decline of the city-state, the classical citizenship concept and its practices could not be fully retained, the ideological tradition of republicanism has not disappeared (Li, 2006, pp. 72-79; Constant, 2017). It was passed on through the republican ideas of Machiavelli<sup>4</sup> and Rousseau's doctrine of morality (Li, 2006, pp. 72-79; Constant, 2017). These thoughts are still reflected in today's politics.

### 2.2.2 Rights-based citizenship from modern bourgeois ideas

The rights-based citizenship of the modern bourgeoisie is typically characterised by freedom, equality, rights, and interests (Heater, 2004; Hosking, 2005; Isin & Turner, 2002, pp. 89–105). In the relationship between citizens and the state, it presents as a contractual exchange relationship (Heater, 2004; Hosking, 2005; Isin & Turner, 2002, pp. 89–105). The rights-type citizenship of the modern bourgeoisie has huge differences from the moral citizenship of ancient Greece, and the conversion process between the two originated in the feudal period in Europe.

In medieval Western Europe, the rise of cities and Christianity made people's secular life tend to materialise, such as the emphasis on money. With the decline of church power at the end of feudal society, increasingly powerful secular forces inevitably assumed the task of shaping the concept of “citizenship” under new historical conditions – as Marx observed, “once the world beyond the truth has disappeared, therefore, the task of history is to establish the truth of this world” (Marx, 1844, p. 2). During the 13<sup>th</sup> and 14<sup>th</sup> centuries, the Renaissance movement in Western civilisation laid the foundation of the “rights” to modern citizenship (Sarti, 2009, pp. 12–45). The core idea of this wave of thought was to replace divinity with humanity, and to focus

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<sup>4</sup> In "The Prince," Machiavelli discussed the behavior of rulers and the pragmatic realities of holding power, providing a "realist" analysis of politics. However, it's in "Discourses on Livy" where his republican ideas are more evident. Here, he examined the structure and benefits of republics, considering the history of Rome as a model (Machiavelli, 2003, 2008). Machiavelli's republicanism emphasized the balance of powers, the rule of law, and civic virtue. He believed in the active participation of citizens in political life, and in their capacity to contribute to the common good. According to Machiavelli, a successful republic required the active involvement and patriotism of its citizens. He also advocated for mixed government—a combination of monarchy, aristocracy, and democracy. Machiavelli's republicanism was rooted in a clear-eyed, unsentimental view of human nature that took into account both its noble and baser aspects (Skinner, 1978). Machiavelli's ideas were foundational to both the classical and modern conceptions of republicanism. His writings influenced political leaders and theorists during the Enlightenment, including Rousseau, and Montesquieu, both of whom incorporated aspects of Machiavellian republicanism into their own political philosophies (Viroli, 2001).

on individual liberation instead of feudalism, secular ethics instead of asceticism, and human free will and free struggle instead of religious fate. Humanists believe that in a well-managed society, the interests of “God”, the public, and the individual can co-exist well. Citizens are not only people who adhere to religious precepts, but are also economically rational individuals who respect laws and regulations (Isin & Turner, 2002; Sarti, 2009; Seligman et al., 2000). Money is not only the guarantee of personal life but is also the strength of the state (Montale, 1972 cited in Sarti, 2009). So, importantly, making money should be regarded as the foundation of the country (Montale, 1972 cited in Sarti, 2009).

During the period when Hobbes and Locke were writing in the 17<sup>th</sup> century, the idea of modern citizenship based on natural rights had matured. Hobbes (2006) believed that in the state of nature, everyone has the “natural right” to use all possible means to defend ourselves. He argued that the essential natural (human) right was:

to use his own power, as he will himself, for the preservation of his own nature; that is to say, of his own life; and consequently, of doing anything, which in his own judgement, and reason, he shall conceive to be the aptest means thereunto' (Hobbes, 2006, pp. 97-102).

In Hobbes' argument, human rationality is the basis of human action. Hobbes completely abandoned the restraint of human beings from divinity (Li, 2006, pp. 72–79). Based on human rationality, he discussed human natural rights afterwards. In contrast, Locke (1957, cited in Rapaczynski, 1987) argued that human beings are inherently free, equal, and independent. Without their consent, no-one can be placed outside this state (the state of nature), or in the political power of another. Although natural law stipulates that everyone enjoys the three natural rights of life, freedom, and property, the state of nature lacks law enforcement officers, statutory laws, and fixed rewards. People's preferences and prejudices can often affect the fair implementation of natural law. Hence, in order to protect the natural rights of individuals, people should give up some of their rights, like punishing others, and hand them over to a government established under a contract. This marks the formation of the state (Morris, 1999; Rapaczynski, 1987).

Nevertheless, during the process of forming a country, people did not give up the three natural rights of life, freedom, and property, because these rights cannot be waived

or transferred. Whether or not these rights are respected is the primary question for the legitimacy of a government (Harrison, 2003; Morris, 1999). If the ruler attempts to obtain absolute power over the people and becomes a dictator, the people have the right to rebel (Harrison, 2003; Morris, 1999). In order to avoid the autocratic leadership present in Hobbesian theory, Locke transferred sovereignty from the executive to the legislature, moving power from the monarch into the hands of individuals. In that way, Locke replaced hierarchical representation with representative democracy (Harrison, 2003; Li, 2006, pp. 72–79).

These 17<sup>th</sup> century ideas laid the foundation for the rights found in the concept of modern (bourgeois) citizenship, concerning the state and government. Based on Locke's ideas of natural rights and the general principles of the institutional setting, Western citizenship has experienced development for hundreds of years. Although many changes and adjustments have been made, this general idea based on rights has not changed substantially (Harrison, 2003; Side, 2006, pp. 89–116). After the Second World War, British sociologist T. H. Marshall gave a highly authoritative explanation of citizenship based on this rights-based concept (Side, 2006, pp. 89–116): citizenship as a way to design pathways to various rights and powers, including citizens' civil rights, political rights, and social rights (Marshall, 1950, cited in Side, 2006, pp. 89-116).

So far, this thesis has roughly outlined two development paths of citizenship. Although classical citizenship and modern citizenship have a chronological order, they do not have a substitute relationship in which one replaced the other. The modern theory of citizenship has developed and become an important basis for the establishment of citizen-state relations, relations between citizens, and citizen self-awareness in countries in the contemporary era. Nevertheless, classical citizenship theory has not disappeared. Instead, it followed another development trajectory alongside modern citizenship (Li, 2006, pp. 72–79; Constant, 2017). With different historical conditions, the two different kinds of citizenship have theoretically confronted and merged with each other from time to time.

#### *The theoretical limitations and practical difficulties of modern citizenship*

In the past 50 years, rights-based citizenship has guided political and societal settings of many countries as a mainstream theory, and has been especially effective in the establishment of the capitalist system. However, with the developments and changes in global society, rights-based citizenship is increasingly revealing its theoretical

limitations which are inconsistent with contemporary times.

The theoretical basis for the establishment of the relationship between the state and citizens in modern citizenship is that of “monarchical” individualism, a view of rights based on the singular individual in which rights are only considered as personal freedoms (Schierup, Castles and Hansen and Koehler, 2008; Li, 2006, pp. 72-79). To a large extent, the freedom of the community lies beyond the scope of modern rights (Schierup, Castles and Hansen and Koehler, 2008; Li, 2006, pp. 72-79). Rights-based citizenship lacks the implication of obligation, emphasising rights rather than duties or obligations; or at least, it arguably does not pay enough attention to responsibilities. The Universal Declaration of Human Rights (UDHR) stressed that everyone has rights, including civil, political, economic, social, and cultural rights, such as the right to life, liberty, free speech, privacy, social security, health, education, and so forth; however, it does not emphasise that everyone has a responsibility to respect and help others to realise their rights. Everyone has the right to live, but no one is living in a vacuum - individual life is always in a specific society, and some conflict between the rights of different people is inevitable (Balta & Altan-Olcay, 2016; Harpaz, 2015; Heater, 2004; Oldfield et al., 1994). Therefore, some responsibility and self-sacrifice are necessary. The neglect of responsibilities and obligations in modern citizenship is one of the reasons for “citizenship crisis” perceived by some scholars in modern times (Balta & Altan-Olcay, 2016; Harpaz, 2015; Heater, 2004; Oldfield et al., 1994).

Since the 1970s, with the increasing promotion of “neo-liberal” economic and social policies, the connotations of rights-based citizenship have been brought to the extreme in practical national policies. Its inherent contradictions and limitations have manifested as various social problems in real life; among these, social exclusion, citizens’ apathy, and populism are the most obvious (Side, 2006, pp. 89–116).

Rights-based citizenship advocates an absolute free market, and as such, it inevitably leads to a widening of the divide between the rich and the poor (Cooper, Heilbroner and Albert, 1994; Strobel, 1996). Accordingly, social exclusion gradually appears in different aspects of social life; for instance, exclusion from the labour market with the increase in unemployment; exclusion from social relations due to the increase in the number of lonely elderly; physical exclusion caused by restrictions of access to sensitive areas for public security; and exclusion from social security caused by the reduction or loss of social assistance (Barber, 1998; R. Cooper et al., 1994; Strobel, 1996). Social exclusion fundamentally shakes the status and rights of citizens and

essentially violates the principle of equality of citizenship, causing serious adverse consequences to citizens' rights, social status, and collective identity (Barber, 1998; Side, 2006, pp. 89–116).

Today in the social science sphere, several figures are circulating to reflect these adverse consequences of exclusion: the 2/3 society, 30:70 society, and 20:80 society (Balta & Altan-Olcay, 2016; Harpaz, 2015; Liang & Liu, 2009). These numbers indicate estimates of the proportion of mainstream society to members of socially excluded groups. It is also estimated that having 20% of labour capacity in the future will be sufficient to maintain the prosperity of the world economy; these workers will be able to produce all the goods needed for the enjoyment of world society and to provide the premier services required. This 20% of people will therefore actively participate in life, make money and consume, while the remaining 80% will be excluded from mainstream society (Balta & Altan-Olcay, 2016; Harpaz, 2015; Liang & Liu, 2009). Social exclusion not only means material deprivation, but also refers to blocking the process of people's participation in decision-making and access to various relevant institutions, making the degree of vulnerability of socially excluded groups spiral upwards (Liang and Liu, 2009; Schattle, 2012). Perhaps even more importantly, social exclusion obstructs a healthy citizenship. It means that some people in society are excluded from the development of society, and it is difficult to hear their voices even in decisions that affect their destiny, a situation which is obviously inconsistent with the democratic ideals of modern society (Harpaz, 2015). Therefore, social exclusion is not only an economic issue but also a political issue related to citizenship. As Barber's sarcasm regarding neo-liberal economic policy commented, “democracy is not the synonym for the private market” (Barber, 1998, p. 72). In other words, the idea that privatising government functions can create a civil society and citizen is a disgraceful myth (Barber, 1998).

In societies with severe social exclusion, income and the nature of homes and settlements divide society into two worlds. Slum areas are not only full of various problems such as violence and crime, but also are often discriminated against by the government and public opinion due to their “poor reputation”. It is difficult for people living in such places to establish a normal connection with the outside world, and it is also difficult to realise their citizenship rights (Liang & Liu, 2009). Their citizenships in societies are usually unacknowledged and the sense of belonging to society and social solidarity is even more distant for them (Liang & Liu, 2009). In the concept and

model of liberal citizenship, which are dominated by the market, citizens are more inclined to be opportunistic and pessimistic, as has been reflected in recent years by the increasing abstention rates in national election voting (van der Ploeg & Guérin, 2016). These abstainers are mostly members of the poorest social strata (Schattle, 2012; van der Ploeg and Guérin, 2016). They are suppressed and alienated to the extent that they do not know how much each election determines their fate. In the past, the poor rebelled; but now, they are anaesthetised by the poverty they are accustomed to. Their plight cannot be alleviated, and they do not even vote (ibid.). Persistent poverty and exclusion have therefore weakened citizenship and political ties. Citizens have even forgotten the existence of their rights and obligations.

In contrast to the pessimistic and apathetic citizens in the lower levels of society, there is also a feeling of exclusion in the enjoyment of rights. This is exploited by political populism. Populists advocate the exclusion of all foreign immigrants from the social welfare system, and a more extreme manifestation is the emergence of “political marketing” (Kelley, 1956, cited in Schattle, 2012) that deliberately confuses the public to earn votes. The "Le Pen phenomenon" in French presidential elections is a typical example (Seligman, Kymlicka and Norman, 2005, pp. 352–381). These are serious consequences of the citizenship crisis, and are argued to be among the most difficult problems facing democratic and capitalist democratic politics today (Seligman, Kymlicka and Norman, 2000; Schattle, 2012).

### **2.3 Integrating Theoretical Perspectives into Citizenship Understanding**

The concept of citizenship, which has traditionally been based on the nation-state, has experienced significant changes due to the influences of globalisation, changing demography, and altering political beliefs. The transition from a narrow, patriotic perspective of citizenship to a more flexible, global concept exemplifies these shifts, emphasising the intricate nature of citizenship in the modern day.

This part examines the shift from national to post / transnational citizenship, utilising the influential research of Anthony Smith on nationalism and the innovative theories of Yasmin Soysal and Sheyla Benhabib on post / transnational citizenship. Through an analysis of the differences between citizenship and nationality, as previously emphasised, I explore the changing terrain of citizenship definitions and policies.

In addition, this part explores the discussions of citizenship within the contexts of communitarian and republican views, as put forth by David Miller and Richard Bellamy, respectively. This study offers a detailed comprehension of how community values, social cohesiveness, civic participation, and the public good influence citizenship policy, specifically in relation to dual citizenship. In an increasingly interconnected world, this analysis aims to shed light on the complicated nature of citizenship today by offering insights into the different factors influencing citizenship policy.

### 2.3.1 From national to post / transnational citizenship

Anthony Smith's ethno-symbolism theory serves as a basis for the shift from traditional notions of nationality to contemporary definitions and policies of citizenship. This theory aligns with the distinction made in section 2.1 between citizenship and nationality. The work of Yasmin Soysal and Sheyla Benhabib on post / transnational citizenship builds upon the historical development outlined in section 2.2. It demonstrates how the era of globalisation presents both obstacles and opportunities for expanding the concept of citizenship beyond national boundaries, in line with the rights highlighted in section 2.1.

#### *Ethno-symbolism: a foundation for modern citizenship*

Ethno-symbolism is a significant theoretical framework used in the study of nationalism. It provides a nuanced perspective that challenges the dominant modernist narratives which portray nations as purely modern entities that emerged alongside capitalism, secularisation, and the weakening of pre-modern loyalties (Anderson, 2020; Gellner, 2008). Smith, an influential person in this area, argued that nations are not new inventions, but are instead firmly rooted in existing cultural and ethnic foundations. The importance of ethno-symbolic factors, like myths, memories, customs, and symbols, in shaping a collective historical narrative is emphasised in his work. This process plays a crucial role in the formation of national identities, going beyond simply civic or political associations (A. D. Smith, 1989, 1993).

Smith's ethno-symbolism challenges the modernist belief that states are temporary by demonstrating how ancient ethnic connections influence and mould the current nation-state. This viewpoint enhances our comprehension of nationalism by demonstrating how nations utilise a profound reserve of symbolic components and shared memories, which play a crucial role in cultivating a feeling of belonging and



continuity among their constituents (Guibernau & Hutchinson, 2004). The utilisation of folklore, historical conflicts, and revered figures in state symbolism and education emphasises the significance of these ethno-symbolic elements in preserving a collective national storyline (Hutchinson, 2012).

Furthermore, ethno-symbolism offers a broader and more comprehensive approach to examining the development of national identity, acknowledging the diversity and fluidity that are inherent in this process. Ethno-symbolism differs from the civic-territorial and ethnic-genealogical models of nationality. While the civic-territorial model focuses on legal status and political institutions, and the ethnic-genealogical model emphasises descent-based criteria, ethno-symbolism takes into account the emotional and psychological aspects of national belonging (Eriksen, 2002; A. D. Smith, 1993). This statement recognises that the emotional connections to collective pasts, lands, and societies are crucial in sustaining and prolonging national communities.

Ethno-symbolism, in its examination of national identity formation, intersects with the research of scholars such as Anderson and Hobsbawm. Anderson (2020) emphasises the idea that nations are constructed as "imagined communities," while Hobsbawm and Ranger (1983) focus on the "invention of tradition" in the development of national identities (Anderson, 2020; Hobsbawm & Ranger, 1983). Nevertheless, Smith's focus on the pre-modern origins of these constructs provides a significant correction to these theories, proposing that although nations may be conceived or created, they are not generated out of nowhere but are rather reinterpretations of pre-established ethnic symbols and narratives.

This theoretical stance encourages a more intricate method in examining nationalism, prompting scholars to analyse the interaction between historical recollection, cultural symbols, and contemporary state-building endeavours. This statement encourages scholars to investigate not only the political or economic circumstances that support the creation of a nation, but also the symbolic and cultural assets that exist before and shape these processes.

#### *Citizenship and nationality: distinct but interconnected*

Smith's theoretical approach, specifically his emphasis on ethno-symbolism, provides a valuable perspective for analysing how contemporary nations manage the contrast between the civic and ethnic aspects of national identity. Ethno-symbolism, as proposed by Smith, highlights the importance of collective history, myths, symbols, and

traditions in the establishment and endurance of national identities (A. D. Smith, 1989). This viewpoint is crucial for comprehending the complex equilibrium that nation-states must achieve between inclusive civic programmes and the recognition of a shared ethnic history.

Citizenship refers to the legal and political affiliation with a particular state, encompassing the civic aspect of national identity. It encompasses the privileges and obligations granted to individuals by the government, and it is fundamentally related to politics and the law. Nationality, in contrast, explores the cultural and ethnic aspect of belonging that goes beyond legal criteria, encompassing a more profound, often emotional attachment to a common heritage, language, and customs (Brubaker, 2009). This differentiation is crucial in analysing the structure of contemporary nation-states, which are constantly navigating the intricate landscape of incorporating heterogeneous populations while preserving a sense of cohesion and identity.

Smith's work elucidates the correlation between states that have a prominent ethnic core and their tendency to have stronger and more unified national identities. While it is true that these governments may face difficulties, the presence of a well-established, cohesive ethnic narrative might help in implementing more consistent citizenship policies. These policies, in turn, demonstrate and strengthen the cultural unity inside the state, often facilitating the expression of a shared national identity that aligns with the beliefs of most citizens (Kymlicka & Wayland, 1996; A. D. Smith, 1993).

Nevertheless, this state of stability frequently entails a price, especially when it comes to incorporating individuals and groups that do not easily align with the prevailing ethnic storyline. The conflict between a state's civic and ethnic aspects might result in policies that aim to promote a more diverse and inclusive identity, or alternatively, strengthen ethnic uniformity by sacrificing diversity (Kymlicka & Wayland, 1996; Parekh, 2001). This contrast emphasises the continuous conflict within nation-states to harmonise the legal and political aspects of citizenship with the ethno-cultural aspects of nationality. This challenge is still a central topic of discussion in debates on immigration, integration, and national identity in the modern world.

Smith's research on ethno-symbolism and modern citizenship policy establishes a fundamental framework for comprehending the intricate interplay between citizenship and nationality within nation-states. Smith's approach examines the relationship between the civic and ethnic aspects of national identity. It provides useful insights into the difficulties and possibilities that modern nation-states encounter when developing

policies that acknowledge the diverse identities of their citizens. The investigation of this connection continues to be a crucial field of study in political science, carrying substantial consequences for policy formation, societal cohesion, and the endeavour for national harmony in an ever more diverse and linked global context.

*The evolution of citizenship in the context of globalisation and rights expansion*

The evolution and challenges of citizenship within the context of globalisation are discussed. This section specifically emphasises the contributions made by Soysal and Benhabib. These researchers' works provide a critical critique of how globalisation has prompted a cross-national re-evaluation of citizenship. This reassessment includes a rights-based perspective that is in line with the concept of transnational citizenship.

Citizenship is widely recognised as a juridical status bestowed by a sovereign state, signifying an affiliation with an individuality predicated on the territorial and legal boundaries of that nation. This social standing entails a unique combination of rights and responsibilities, including the ability to vote, access to social assistance, adherence to legal requirements, and prospective military service. The following rights and responsibilities are exclusively valid for individuals who hold the status of citizens of a sovereign state. These rights and responsibilities differentiate citizens from foreigners and define the extent of their national identity and political involvement (Marshall & Bottomore, 1950).

The accelerating globalisation of the 20th and 21st centuries has resulted in about considerable transformations an unprecedented increase in the cross-border flow of capital, ideas, goods, and people characterises this phenomenon. The dynamics in question have posed a substantial challenge to the perspective that citizenship is only based on nationality. Migration has increased as a result of globalisation, creating multicultural and transnational groups that regularly transcend the boundaries of nation-states in terms of both law and culture (Castles, 2002). These advancements challenge the conventional assumptions of citizenship, including its limited nature and the distinct separation between individuals who are citizens and those who are not.

In her influential book "Limits of Citizenship" (1994), Soysal discusses a significant change in the characteristics of citizenship rights. She contends that the privileges formerly limited to citizens have gradually expanded to include immigrants, therefore causing a blurred distinction between citizens and noncitizens. Soysal's analysis highlights the rise of a post-national membership model, in which rights are

increasingly determined by personality rather than nationality. The importance of international human rights agreements and conventions, which advance people's rights regardless of citizenship status, serves as another evidence of this tendency. As a result, this challenges the traditional authority of nation-states in determining rights (Soysal, 1994).

Furthermore, Hammar (1994) created the term "denizenship" to describe foreign residents who, although not possessing complete citizenship, have specific privileges that are typically associated with citizenship. This development indicates a removal of territorial boundaries from rights, which adds complexity to the conventional distinction between citizens and noncitizens and emphasises the impact of globalisation on national policies and identities (Hammar, 1994).

The phenomenon of globalisation has exerted a noteworthy influence not only on cross-border human migration but also on the dissemination of concepts and norms, including international human rights principles. These values have not only surpassed geographical bounds but also begun to have a substantial impact on national policies and legal frameworks in different countries. The global dissemination and local acceptance of human rights norms is an illustration of "normative isomorphism," wherein states adopt comparable norms, policies, and practices as a result of globalisation's influence, with the goal of achieving legitimacy in the international system (J. W. Meyer et al., 1997).

Benhabib's influential book, "Migrations and Mobilities: Citizenship, Borders, and Gender", explores the many ways in which globalisation has required us to rethink the concept of citizenship (Benhabib, 2009). According to Benhabib (2009), conventional understandings of citizenship—which are grounded on the nation-state paradigm—are growing less able to handle the multifaceted nature of cross-border migrations. The gendered characteristics of migration challenge and modify the understanding of citizenship rights and obligations, as highlighted by Benhabib and Resnik (2009). The focus on gendered views underscores the distinct experiences of males and females within the realm of migration, indicating that the consequences for theories and practices of citizenship are significant and complex.

Moreover, the relationship between globalisation and human rights norms has generated academic discussions on the development of "cosmopolitan citizenship" (Appiah, 2007) or "global citizenship" (Held, 1995), which advocate for a type of citizenship that surpasses national boundaries and acknowledges the interdependence

of individuals on a global level. This perspective promotes a revised understanding of citizenship that includes rights and obligations that are not restricted by geographical borders, but rather grounded on the common humanity and inherent worth of individuals around the globe.

The growing impact of international human rights standards on domestic policy can be comprehended by examining "transnational legal processes" (Koh, 2017), which refer to the mechanism through which international law is incorporated into national legal systems. This process requires the participation from multiple entities, including states, international bodies, and non-governmental organisations, in the communication, application, and comprehension of international norms. The growth of human rights ideas and their assimilation into national policies are influenced by globalisation, which also plays a role in the evolving nature of international governance and sovereignty.

Ultimately, the increased globalisation has had a significant and far-reaching effect on the conventional understanding of citizenship, by questioning its focus on individual nations and its excluding characteristics. The expansion of rights to individuals who are not citizens, the rise of communities that transcend national boundaries, and the impact of global human rights standards all indicate a movement towards more comprehensive and adaptable concepts of membership. This transformation necessitates a reconceptualized comprehension of citizenship, one that recognises the intricacies of the interconnected globalised world and the interreliance of communities across national boundaries.

#### *Post / transnational citizenship*

Soysal and Benhabib's works emphasise a significant change in how citizenship is understood, going beyond the traditional boundaries of the nation-state to adopt a more comprehensive and universal framework. Soysal (1994) presents a persuasive case for comprehending citizenship within the framework of international human rights systems. Soysal (1994) argues that the growing importance of international human rights norms is causing a transformation in the concept of national citizenship. A post-national paradigm is emerging as a result of this transition, one in which personhood and rights are independent of national affiliation. This model proposes that the legal and social rights that have traditionally been given by nation-states can now be demanded based on the concept of universal personhood. Soysal's work reflects a shift towards a more comprehensive understanding of citizenship that goes beyond national borders.

Benhabib's efforts enhance the understanding of this discussion by promoting deliberative democracy and cosmopolitan values. Benhabib advocates for cosmopolitan federalism in her books, including "The Rights of Others" (2004). This concept entails individuals participating in international dialogues and negotiations to develop globally acknowledged human rights. She argues that the cosmopolitan model of citizenship necessitates a reconsideration of sovereignty, wherein the privileges of individuals, as members of a worldwide community, are given greater importance than the geographical privileges of nations (Benhabib, 2004).

The transition towards a post / transnational paradigm of citizenship reflects broader changes in how rights are governed, as emphasised by Ruud Koopmans (2012) in his examination of political claims-making in transnational contexts. The rise of supranational bodies, such as the European Union, and non-governmental organisations (NGOs), plays an important role in facilitating this transformation. Transnational groups are essential in promoting and ensuring the protection of human rights globally. Their acts serve as a prime example of the evolving political activity and preservation of rights, where the conventional state-focused paradigm of governance is progressively supplemented (and occasionally questioned) by transnational players (Koopmans, 2012).

The dialogue among Soysal, Benhabib, and Koopmans highlights the urgent reassessment of citizenship in the modern period. It reveals an intricate interplay between one's sense of national identity, the rights that apply to all humans, and the growing influence of international organisations and non-governmental entities in the worldwide management of these rights. According to this analytical paradigm, citizenship will no longer be confined to the boundaries of nation-states. Instead, it will be characterised by a more flexible, inclusive, and rights-centered approach that acknowledges the inherent worth and entitlements of persons as universally applicable entities.

### *Challenges and Critiques*

Nevertheless, the reimagining of citizenship beyond the confines of national borders, faces critiques on both empirical and theoretical grounds. First and foremost, the actual data that supports the separation of rights from national citizenship is not conclusive. Critics argue that although there are cases where non-citizens can enjoy some rights in host nations or through international human rights frameworks, the nation-state still

holds the ultimate authority in determining and enforcing rights (Joppke, 2010). The entity possesses the ultimate authority to bestow, refuse, or withdraw citizenship and, consequently, the privileges linked to it. The persistent power of the nation-state highlights its ongoing significance and contradicts the idea that a post-national model of citizenship could readily replace it.

Moreover, an important difficulty in a post-national environment is the distribution of rights. Under the current paradigm, nation-states primarily determine individuals' rights based on their citizenship status. A comprehensive legal and institutional framework accomplishes this. Within a post-national framework, the specific authority that would take on this crucial responsibility and the manner in which it would handle the intricate challenges of global diversity and inequality are still uncertain. Moravcsik (2000) explores the possible ways in which rights are distributed in a post-national setting, proposing that international organisations or agreements could have a crucial influence. However, it has also been emphasised that the present constraints of these organisations in consistently upholding rights across many legal regimes (Goodman & Jinks, 2004; Moravcsik, 2000). The legal framework and enforcement capacities of the nation-state play a crucial role in the existing concept of citizenship, guaranteeing that rights are not only acknowledged but also enforceable. Within a post-national context, the delegation of power to supra-national organisations or a combination of bilateral and international agreements gives rise to concerns regarding the effectiveness and uniformity of safeguarding rights (Faist, 2012; Pogonyi, 2011).

Critics further contend that the notion of post-national citizenship fails to acknowledge the varying capabilities and political systems of different countries, presuming a uniformity that is not present in reality (Hathaway, 2021). The assumption that international or supra-national organisations can protect rights assumes a certain degree of collaboration and adherence that may not be present, especially in authoritarian regimes or governments with long-standing human rights abuses (W. H. Meyer, 2019). Within these particular situations, the systems in place to safeguard rights beyond the framework of the nation-state are frequently lacking in development or intentionally violated. Hathaway (2021) highlights the challenges of advocating for human rights in countries that are either resistant or incapable of enforcing these rights within their own borders. These critique highlights the danger of underestimating the difficulties involved in implementing post-national citizenship models in nations that have a history of violating human rights. These countries may not only lack the

determination or ability to preserve the rights defined by international standards, but they may also actively oppose or weaken efforts to enforce these standards, seeing them as violations of their sovereignty (W. H. Meyer, 2019). Hathaway (2021) suggests the frequently feeble and non-obligatory nature of international procedures for implementing human rights. Meanwhile, this underscores the constraints of post-national processes in guaranteeing rights and citizenship in varied political environments, suggesting that post-national citizenship models need to be flexible enough to accommodate various political contexts and capable of addressing the unique obstacles presented by non-democratic governments.

In addition, the discussion regarding post-national citizenship includes not only the logistics and feasibility of implementing this paradigm, but also involves normative deliberations about the essence of citizenship. Detractors contend that implementing such a framework may undermine the fundamental agreement that forms the basis of the connection between individuals and the government, so weakening the shared commitments and duties that unite them (Bauböck, 1994; Koh, 2017). This erosion has the potential to weaken the fundamental foundations of national sovereignty, posing a threat to the legitimacy and authority of nation-states in regulating their territory and population. Moreover, there is disagreement on the practicality of the post-national model in promoting a feeling of unity and inclusion on a larger, international level. It is challenging to recreate the common history, culture, and identity that frequently form the foundation of national communities in a larger and more diverse supranational framework. Bauböck (1994) expresses apprehensions on the possibility of a post-national citizenship model diminishing these connections, casting doubt on the ability to establish a true sense of belonging without the customary indicators of national identity.

To summarise, while the concept of post-national citizenship is an intriguing response to the issues brought by globalisation and migration, it has received significant empirical, practical, and normative criticism. The nation-state remains a key factor in determining rights, and the difficulties in moving away from this paradigm indicate that any shift towards post-national citizenship will necessitate thoughtful examination of the various consequences and obstacles.

### 2.3.2 Citizenship in the context of communitarian and republican theories



This section examines the communitarian and republican perspectives on citizenship and analyses how these viewpoints influence dual citizenship policies. The review explores David Miller's communitarian perspective, comparing it to the inclusive perspectives of Soysal and Benhabib, and incorporating Richard Bellamy's emphasis on republican citizenship. This exploration not only highlights the nuanced debates surrounding dual citizenship policies but also underscores the evolving nature of citizenship responsibilities and participatory dimensions.

#### *Miller's communitarian perspective on citizenship*

David Miller's communitarian perspective on citizenship highlights the inherent link between human identities and the communities they are a part of. This viewpoint emphasises the importance of common values, customs, and social togetherness in the formation of citizenship, suggesting that these collective aspects are fundamental to the strength and harmony of society. Miller believes that laws like dual citizenship might undermine the strength of communal ties, potentially weakening the sense of belonging and togetherness that is essential for a cohesive community (Miller, 1989, 1995).

The scholarly literature on citizenship and immigration, exemplified by the research conducted by Bloemraad, Korteweg, and Yurdakul (2008), supports Miller's focus on national identity and the unity of communities. It underscores the conflict between ethnic and civic interpretations of citizenship, as well as the difficulties arising from multiculturalism and the existence of dual citizenship, which can challenge the identity of nation-states (Bloemraad et al., 2008). McFarland et al. (2019) analyse the subject of worldwide human identification and citizenship, acknowledging the tension between global inclusion and the local connections stressed by communitarian philosophers like Miller. McFarland and a number of other researchers identified an inverse correlation between ethnocentrism and global citizenship identification (McFarland et al., 2019). This implies that broader understandings of citizenship may have the potential to weaken local communal connections.

Moreover, the communitarian criticism also applies to educational methods, as examined by Geboers et al. (2013), who assess the impact of citizenship education on promoting community ideals among students. This study reinforces the communitarian perspective by emphasising the significance of an educational emphasis on the political and social aspects of citizenship. It specifically highlights the value of open and democratic classroom environments that encourage community involvement and unity

(Geboers et al., 2013). Tambakaki (2009) explores the transition from citizenship based on traditional nation-states to more inclusive models that prioritise human rights. While this shift promotes fairness, it may also weaken the communal aspects of citizenship emphasised by communitarian thinkers (Tambakaki, 2009). This literary work presents a discourse between two perspectives concerning citizenship: one that places significance on shared values and communal ties as means to foster social cohesion and individual identity within the community, and the other that advocates for inclusiveness and a comprehensive conception of citizenship.

Ultimately, the broadening of citizenship definitions to encompass dual or global identities aims to acknowledge the interconnectedness of our globe. However, this expansion also poses a challenge to the emphasis on community-specific bonds and shared values that is central to communitarianism. The tension shown here emphasises the intricate relationship between personal liberties and collective responsibilities, a delicate equilibrium that is essential for upholding social unity and a feeling of inclusion in societies that are becoming more varied. Miller's scepticism regarding dual citizenship arises from a communitarian standpoint, emphasising the importance of social unity and a feeling of belonging to a unified community. From this perspective, having dual citizenship could weaken the intensity of community connections and civic obligations, potentially eroding the social structure that unifies a nation-state (J. Blatter, 2011; J. K. Blatter, 2008).

In contrast, Soysal's postnationalist approach contends that individuals' rights and identities are increasingly based on their humanity rather than their nationality. This challenges the traditional nation-state concept of citizenship (Soysal, 1994). This perspective implies that conventional notions of citizenship and loyalty are becoming obsolete in a globalised era, where individuals may have affiliations with numerous nations without compromising their sense of identity or civic responsibility. Benhabib (2004) expands upon this all-encompassing approach by pushing for cosmopolitan federalism, which entails the coexistence of universal human rights and democratic self-determination. In order to get around the drawbacks of conventional citizenship models, this model supports accepting dual citizenship. It makes the case that people can be loyal in different ways and still participate in their communities in an ethical and active manner (Benhabib, 2004).

Recent scholarly research delves into these discussions by analysing the tangible consequences of dual citizenship and investigating its intersection with modern

democratic theories. Through the prism of several normative conceptions of democracy, including liberal, republican, communitarian, multicultural, deliberative, and cosmopolitan / transnational democracy, Blatter (2008, 2011) investigates the benefits and drawbacks of dual citizenship. Blatter's analysis demonstrates that communitarian concerns prioritise the possible threats to national unity, whilst other theoretical viewpoints view dual citizenship as a desirable mechanism for bolstering democratic engagement and rights in a globalised society. In addition, empirical research, such as the studies conducted by Schlenker (2017), investigates the connection between transnational status and cosmopolitanism. This study reveals that persons who possess dual citizenship or foreign residency status demonstrate distinct manifestations of cosmopolitanism (Schlenker, 2017). These studies highlight the intricate nature of cosmopolitan identities and proposes that individuals with dual citizenship can act as leaders of liberal, republican, and communitarian cosmopolitanism. Each of these perspectives makes a distinct contribution to the global democratic environment.

In conclusion, the discussion around dual citizenship highlights a core conflict between the communitarian focus on societal unity and the cosmopolitan inclination towards universal rights and identities. Miller's concerns over the potential weakening of communal ties are noteworthy. However, the inclusive perspectives of Soysal and Benhabib, together with wider scholarly discussions, emphasise the transformational possibilities of dual citizenship. This encompasses its ability to promote more comprehensive forms of identity and loyalty that are well-suited to the intricacies of the globalised world. The concept of dual citizenship may be seen as an expression of how democracy and citizenship are evolving in a more varied and interconnected world.

#### *Bellamy's republican citizenship*

Richard Bellamy emphasises the crucial importance of civic participation in maintaining democratic societies in his understanding of republican citizenship. In this sense, citizenship becomes more than just a set of rights; it is an active process in which one actively participates for the good of the community (Bellamy, 2008). Bellamy's theory is based on the classical republican tradition, which regards public participation as both a right and a duty of citizenship, thus promoting a strong democratic culture. This model aligns with the Aristotelian concept that the core of democratic citizenship is the involvement in public affairs. It emphasises that a genuinely democratic society depends not only on granting rights to its citizens but also on their active participation

in political activities (Everson & Aristotle, 1996). This is also consistent with one of the three mainstream understandings of citizenship mentioned in section 2.1: action citizenship (“acted” citizenship). Citizenship should not be understood only as a static legal status or a series of citizenship rights provided to citizens by the state but should be understood as citizens practising the legal rights they possess through concrete actions (Taylor, Turner and Hamilton, 1994; Heater, 2004).

Building upon Bellamy's concept, the inclusion of dual citizenship in the discussion adds another level of intricacy. In this context, the ability to engage in civic participation is defined as the capability to extend beyond national boundaries, therefore enhancing democratic government by incorporating a transnational aspect of civic engagement. This concept is in line with the viewpoints expressed by scholars such as Bauböck (2003), who propose a reconsideration of citizenship that allows for numerous political loyalties and enables political engagement in many governing bodies (Bauböck, 2003; Mirilovic, 2015). Bauböck's approach highlights the notion that dual citizenship can function as a conduit between civilizations, augmenting democratic discourse and collaboration on a global scale.

In addition, Bellamy's focus on the collective welfare and moral responsibility aligns with the communitarian criticisms of liberal individualism, as expressed by authors like Sandel (2005) and Taylor (1992). These criticisms emphasise the constraints of a citizenship framework centred on rights, which fails to recognise the significance of communal connections and civic obligations (Sandel, 2005; Taylor, 1992). In this particular situation, Bellamy's republican model of citizenship might be perceived as providing a remedy to the individualistic inclinations of liberal ideology, by reaffirming the importance of collaborative efforts and civic involvement in the democratic process.

Nevertheless, when applying Bellamy's approach to the concept of dual citizenship, it prompts inquiries regarding the feasibility of cross-border civic participation and its impact on the authority of nations and the responsibility of democratic governance. Is it possible to fully achieve the principles of republican citizenship in a globalised world when loyalties are becoming more flexible and political communities are not solely determined by geographical borders? This question prompts a deeper investigation into the equilibrium between cosmopolitan ambitions and the practicalities of political structure and identity (Bohman, 2001; Follesdal, 2002; Hanasz, 2006).

In its entirety, Bellamy's republican model of citizenship, which places civic engagement and the pursuit of the common good at the forefront, offers a compelling structure for reassessing the character of political involvement in an interconnected global society. Bellamy's approach combines classical republicanism with modern concerns on dual citizenship, offering a valuable perspective to analyse the difficulties and advantages of democratic involvement in a world that is becoming more interconnected.

An in-depth analysis of the differences and similarities between Miller's communitarianism and Bellamy's republicanism requires exploring their core ideas about citizenship, within the larger context of discussions about civic involvement and social participation. Miller's articulation of communitarianism highlights the significance of communal connections, shared principles, and the endeavour to achieve collective benefits. This philosophical perspective emphasises the importance of social unity and a shared sense of identity, promoting a concept of citizenship that is strongly based on the idea of communal solidarity. On the other hand, Bellamy's republicanism highlights the importance of public interaction and active participation. It implies that being a citizen requires active participation in public life and the democratic process.

The contrast between these two viewpoints encourages a more comprehensive comprehension of citizenship that goes beyond only the legal status or rights-focused frameworks, to encompass a more profound involvement with the moral, social, and participatory aspects of being a member of a political society. It is evident from Tocqueville's research (1945), which was highlighted by Uslaner (2002), that religious convictions frequently motivate people to engage in community service projects including social change, volunteer work, and charitable giving. These interactions between individual initiative and communal bonds are crucial in shaping thriving democracies (Uslaner, 2002). In addition, Barros (1999) explains how labour relations contribute to the promotion of an engaged citizenry, emphasising that involvement in community activities and public matters is crucial for the growth of a strong civic culture. Calhoun's (1999) analysis emphasises the sociological aspects of citizenship, advocating for a comprehensive conception that encompasses both social inclusion and active involvement (Calhoun, 1999).

However, there are many challenges in putting these ideas into practice. Michels (2019) points out that citizens' summits, despite their potential, frequently only attract a specific group of people and struggle to maintain long-term public engagement. This

raises doubts about the effectiveness of participatory mechanisms in fostering a feeling of belonging and responsibility among citizens (Michels, 2019). This critique highlights the necessity of ongoing exploration and innovation in democratic procedures that can effectively accommodate the varied manifestations of citizenship and community involvement.

Miller's communitarianism and Bellamy's republicanism offer contrasting yet interrelated perspectives on citizenship. Miller emphasises the necessity of social solidarity and a shared sense of belonging, while Bellamy highlights the significance of active involvement and public engagement as the foundation of citizenship. Bellamy's emphasis on the active aspect of citizenship aligns with the viewpoints of civic republicans and deliberative democrats, who both consider participatory democracy crucial for the well-being of the political community. Within this framework, the obligations and active involvement associated with being a citizen become more important, providing valuable understanding of how individuals might fulfil their civic responsibilities in both single and dual citizenship situations.

## **Conclusion**

Defining citizenship has proved to be a controversial task in academia. Many definitions of "citizenship" incorporate "contextual factors" into their understanding; that is, scholars from different fields of research incorporate their specific concerns into the concept of citizenship and interpret it in relation to their interests. This thesis, like Schumpeter's definition of "democracy," adopts a "minimalist definition" of citizenship in order to avoid these possible issues. This definition separates the core meaning of citizenship from the numerous contextual aspects that are closely tied to it. In this concept, the "minimalist definition" of citizenship is that it signifies an individual's political membership within the political community.

There are two sets of inherent relationships (the relationship between individual citizens and political communities, and that between individual citizens) and five derived elements (substantive elements, procedural elements, normative elements, emotional elements, and paradoxical elements) within the "minimalist definition" of citizenship. Most definitions of citizenship are largely the reinterpretation of two sets of inherent relations, and the five derived elements are essentially to the construction of different research topics of citizenship theory.

Occasionally, the phrases "citizenship" and "nationality" are used interchangeably, nevertheless, they represent separate notions. This chapter distinguishes between the legal-political concept of citizenship and the ethno-cultural concept of nationality. In most cases, a person can only be a national of one country or region but can hold the citizenship of several countries.

A comprehensive analysis of the historical progression of citizenship, including its growth from ancient societies to the present age, provides a contextual understanding of the changing concepts of citizenship throughout history. Moral superiority and duty were typical in the morality-based citizenship of ancient Greece. Modern (bourgeois) citizenship laid an important foundation for today's "rights-based" understanding of citizenship. The two types of citizenship theoretically confront and merge with each other from time to time under different historical conditions.

The incorporation of theoretical perspectives into the comprehension of citizenship, including the examination of citizenship from national to post/transnational viewpoints, in addition to the insights offered by communitarian and republican theories, uncovers the complex layers and dynamic forces that shape citizenship in the contemporary period. Smith's focus on ethno-symbolism, along with Soysal and Benhabib's explanation of post / transnational citizenship, demonstrates the shift from conventional, limited concepts of citizenship to more comprehensive, flexible models that beyond national boundaries. Miller's communitarian perspective and Bellamy's republican approach to citizenship emphasise the importance of communal ideals, civic involvement, and the public good in developing and executing citizenship policy.

This theoretical framework enhances our comprehension of the progression of citizenship and emphasises the intricacies and difficulties of formulating citizenship policies that may adapt to the actualities of worldwide movement, cultural variety, and political involvement. Over time, it becomes increasingly clear that citizenship, in its different manifestations, remains a vital notion for understanding and navigating the socio-political landscape of the 21st century. This necessitates continuous scholarly focus and careful policy deliberation in response to changing global challenges.

## CHAPTER 3

### DUAL CITIZENSHIP AND DUAL CITIZENSHIP POLICY

This chapter discusses dual citizenship and dual citizenship policy, providing definitions that allow this thesis to highlight the aspect of citizenship that are most relevant to the study: single and dual citizenship policy. The comparative analysis that follows compares single and dual citizenship policies in different countries, and a comprehensive definition can serve as a basis for comparative analysis, clarifying how single or dual citizenship and citizenship policies are viewed or enacted differently in different places. Incorporating the theoretical underpinnings in Chapter 2 helps analyse the normative and practical aspects of dual citizenship, aiding us to understand policymakers and scholars in crafting informed and nuanced citizenship policies in an increasingly interconnected world.

Sections 3.1 and 3.2 explain the definition and understandings of dual citizenship and dual citizenship policy, including the terms and meanings of dual citizenship and dual citizenship policy, the basic principles of determining citizenship, the reasons for the emergence of dual citizenship, categories of dual citizenship policy, and so forth. Section 3.3 outlines the historical evolution of dual citizenship policy, including four historical stages and a contemporary world map of the countries that have adopted a dual citizenship policy. Section 3.4 offers theoretical insights into dual citizenship policy, including normative frameworks for dual citizenship and policy implications of theoretical perspectives. The chapter ends with a conclusion section.

#### **3.1 Dual Citizenship**

As discussed in Chapter 2, citizenship is the political membership of people in the political community. It can be a legal qualification of a person as a national or citizen of a particular country. In essence, citizenship refers to the status of an individual as a member of a given country (Archibugi, 2008; Oldfield et al., 1994, pp. 177–187; van der Ploeg & Guérin, 2016). Grounded in this relationship, the person is subject to the personal jurisdiction of the country and has rights and obligations as a citizen in that country. When abroad, they have the responsibility to be loyal to their country and to understand certain obligations. Meanwhile, the country has the duty to provide



diplomatic protection to its citizens (Archibugi, 2008; van der Ploeg and Guérin, 2016). Citizenship has great significance to a country, and matters to its sovereignty. In principle, citizenship should be only regulated by the domestic policies or laws of the country, and the country will grant individuals citizenship by determining if they qualify (Mirilovic, 2015). There is no universal rule across the world to determine citizenship, as each country has its own legislation and policies to manage it. Dual citizenship emerged because of how various and interrelated national policies of citizenship interweaved (Faist & Kivisto, 2007).

There are three principles on the basis of which citizenship is granted: *jus sanguinis*, *jus soli*, and a mix between the two. First, the principle of *Jus sanguinis* (by the blood lineage) is where the citizenship of a person is determined by the citizenship of their parents (Mügge, 2012). According to *Jus sanguinis*, a child born to citizens of a country has citizenship of that country, regardless of where they were born or the circumstances, because their parents have citizenship of this country. *Jus sanguinis* can be divided into single lineageism and double lineageism (Mügge, 2012; Oldfield et al., 1994). Single lineageism is defined by the citizenship of a child based on the citizenship of his or her father. Dual lineageism refers to the determination of the citizenship of a child based on the citizenship of either the father or mother (Mügge, 2012; Oldfield et al., 1994). At present, most countries tend to adopt dual lineageism (Harpaz, 2015; Mügge, 2012).

The second is the principle of *Jus soli* (by the birthplace). This means that a person's citizenship is determined entirely by their place of birth (Mügge, 2012). If the person was born in the territory of a country, then they have citizenship of that country, regardless of which citizenship their parents have (Mügge, 2012; Oldfield et al., 1994). By the second half of the 19th century, birthplace dominance had begun to prevail in citizenship legislation in major Western countries (Heater, 2004). At the Cambridge Conference in 1895 and the Venice Conference in 1896, the Institute of International Law established the legislative principle that citizenship law should be dominated by the principle of *Jus soli* (Hansen & Koehler, 2005; Heater, 2004). In the early 2000s in the United States and a few Latin American countries, in order to increase the population of the country, the principle of *Jus soli* was also widely adopted (Hansen & Koehler, 2005; Heater, 2004).

The third is the mixture principle, which combines the two abovementioned principles of *Jus sanguinis* and *Jus soli*. In practice, the two approaches of *Jus sanguinis* and *Jus soli* are both applied. In an individual case, different principles will be adopted

(Harpaz, 2015). Some countries are dominated by Jus sanguinis supplemented by Jus soli. The main such countries are Thailand, Russia, Turkey, etc. (Harpaz, 2015; Mügge, 2012). Some are based on Jus soli, supplemented by Jus sanguinis, among which are Cuba, Chile, New Zealand, and so on (Harpaz, 2015; Mügge, 2012). Others use a balance of Jus sanguinis and Jus soli. Countries that have balanced Jus sanguinis and Jus soli include France, Mexico, Peru, Indonesia, Ghana, and others (Harpaz, 2015; Mügge, 2012). Because the mixture system can better protect national interests, most countries in the world currently adopt it (Mügge, 2012).

Besides the principles which countries have adopted to determine their nationals' citizenship, people can acquire citizenship on their own initiative in a process known as naturalisation. As political and economic exchanges between countries become more frequent, and the frequency of population movements increases, naturalisation is a primary way of obtaining dual citizenship (Bauböck, 2018; Mügge, 2012; Yanasmayan, 2015). People can obtain another citizenship in addition to their initial citizenship. Naturalisation means that a foreigner or stateless person has acquired the citizenship of a country through voluntary application and approval under the laws or policies of that country (Mügge, 2012). Naturalisation can occur in circumstances of marriage, adoption, and territorial change (Mügge, 2012; Yanasmayan, 2015).

The acquisition of citizenship by marriage means that a citizen of one country acquires the citizenship of another country by marrying a citizen of that other country. Based on the citizenship policy of most countries, the citizenship of men is generally not affected by marriage.<sup>5</sup> However, a woman's citizenship may change due to marriage (Yanasmayan, 2015). The acquisition of citizenship as a result of adoption refers to the adoption of a child of another country or a stateless child by a citizen of a country to enable the adopted child to acquire the citizenship of the adopter (Harpaz, 2015; Yanasmayan, 2015). Obtaining citizenship through territorial change means that, according to certain international treaties or territorial agreements between countries, after the territory of one country has been lost, the citizens in the territory will change their citizenships and become citizens of the country or countries which now control that territory (Harpaz, 2015; Yanasmayan, 2015).

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<sup>5</sup> Same-sex marriage is a special case. The citizenship of both parties to the marriage will be analysed according to the different policies of different countries - including whether the country recognises same-sex marriage and the relevant policies determining citizenship regarding the marriage parties. Where this analysis involves the issue of same-sex marriage, it will be discussed in specific contexts, with details provided of the country and its relevant marriage and citizenship policies and laws.

Naturalisation is often the cause of dual citizenship, because a person can apply for or obtain citizenship in a country, but may not lose their previous (original) citizenship (Harpaz, 2015). Dual citizenship occurs when a person who has acquired the citizenship of country A acquires the citizenship of country B in country B. The legal fact then emerges that a person has the citizenship of two or more countries at the same time (Faist & Kivisto, 2007; Mirilovic, 2015; Schierup et al., 2008; Vera-Larrucea, 2012). The notion of multiple citizenship is similar in nature to that of dual citizenship; indeed, the production of multiple citizenship is premised on the establishment of dual citizenship (Lister, 2007a; Spiro, 2011). Therefore, many scholars use the term "dual citizenship" in their research, including the meaning of "multiple citizenships". In this thesis, the term "dual citizenship" contains the meaning of multiple citizenships, and the two terms are not distinguished.

Howard (2005) argued that dual citizenship or multiple citizenship means a legal status by which a person has the citizenship of two countries at the same time. The fundamental laws of both countries consider that he or she is a citizen of the country and is a dual citizen. Sometimes he or she may be referred to as a "hybrid citizen" in diplomatic terms. Faist and Kivisto (2007) defined citizenship similarly, adding that due to the complexity of citizenship policy, the citizenship of individuals is a matter of domestic law. Originally, every individual was expected to hold one and only one citizenship, but because each country applies different principles and regulations on citizenship, the outcomes are often far from "one citizenship". Some people may have two or more citizenships, while others may not have citizenship of any country (Faist & Kivisto, 2007), making both global citizens and stateless people a reality in today's world. Vera-Larrucea (2012) suggests that many international laws and policies do not define dual citizenship, and also explains why dual citizenship occurs. It has been declared that a person can knowingly or unknowingly, and intentionally or unintentionally, have dual citizenship (Schattle, 2012, p. 233; Vera-Larrucea, 2012).

The main reason for dual citizenship is that a citizen's two countries of citizenship implement different systems entitling citizenship (Mügge, 2012). For example, where country A adopts *Jus sanguinis*, and country B adopts *Jus soli*, if the parents of a citizen are both citizens of country A, and have a child born in country B, then this child will have dual citizenship (Harpaz, 2015; Mügge, 2012). An example here is German parents giving birth to a child in the United States. The child in this case automatically holds dual citizenship from birth (Harpaz, 2015). There are also some people who have

dual citizenship because they did not give up their original citizenship after taking up the citizenship of another country. The citizenship policy of many countries does not require applicants to give up their original citizenship before applying for naturalisation. Suppose the country of the citizen's original citizenship does not require the citizen to give up the citizenship of the country when they join the citizenship of another country. In that case, these people have two or more citizenships simultaneously. Such a dual citizenship status is based on the premise of meeting the laws of both countries (Harpaz, 2015; Mügge, 2012).

“Involuntary” naturalisation, which may not be sought on the person’s initiative but in accordance with the policies stipulated, such as marriage, adoption, and territorial change, could also bring about dual citizenship. Some citizenship policies provide that when a male citizen marries a foreign woman, the woman cannot acquire the country’s citizenship, and vice versa. However, in some countries the wife is entitled to her husband’s citizenship, either conditionally or unconditionally (Harpaz, 2015; Yanasmayan, 2015). This has a significant impact on women. For example, if a Thai man marries a Romanian woman, according to the laws of both countries, the woman then will have dual Thai and Romanian citizenship due to the marriage.

Moreover, in some countries, when a foreign child is adopted by a citizen, the foreign child is granted the adopter’s citizenship (Harpaz, 2015). If the adoptee's citizenship law provides that adoption does not affect citizenship, then the foreign child will have dual citizenship (ibid.). In practice, when a British person adopts an Austrian child, Section 8 of the Adoption of Children Act 1949 provided that “where an adoption order under that Act was made in respect of an infant who was not a citizen of the United Kingdom and Colonies, then, if the adopter (or in a joint adoption, the male adopter) was a citizen of the United Kingdom and Colonies, the infant would become a citizen of the United Kingdom and Colonies as from the date of the adoption order” (Harpaz & Mateos, 2018; Yanasmayan, 2015). The same provision was contained in Section 19 of the Adoption Act 1958 and it was later extended by Section 1(3) of the Adoption Act 1964 to include adoptions made in the Isle of Man or in any of the Channel Islands. These provisions are now contained in Section 40 of the Adoption Act 1976, which came into force on 1 April 1977 (“Dual Citizsh. Eur.,” 2007). Therefore, the Austrian child successfully acquires British citizenship, and at the same time, Article 11 of the Austrian Citizenship Act stipulates that adoption does not affect citizenship, so the adopted child does not lose their Austrian citizenship as a result of

being adopted, which results in the adopted child having both British and Austrian citizenships (“Dual Citizsh. Eur.,” 2007; Harpaz & Mateos, 2018).

### **3.2 Dual Citizenship Policy**

Citizenship policies refer to all government rules, regulations, and documents, as well as legislation on the acquisition and loss of citizenship (Manby, 2016a; Mirilovic, 2015; M. P. Vink et al., 2013). Together, these constitute a complete system which can be referred to as "citizenship policy". Its content is stipulated in a country's constitution, citizenship Act(s), immigration management policy, and the relevant provisions of its implementation. More specifically, these rules include different levels of immigration management policies, citizenship Acts, immigration laws, government regulations, and legal documents, and regulate the acquisition, loss, restoration, and management of citizenship (Manby, 2016a; Mirilovic, 2015; M. P. Vink et al., 2013). Dual citizenship policies have been produced during the development of dual citizenship. Consequently, the legal documents and government regulations and policy specified by a country to manage dual and multiple citizenships are defined as a dual citizenship policy (Vink, Prokic-Breuer and Dronkers, 2013; Mirilovic, 2015).

A dual citizenship policy not only stipulates the rights and obligations of the country and individuals, but also determines the population distribution of different countries around the world. On a national level, citizens are one of the most fundamental elements of a country. The number, quality, and characteristics of a country's citizens partly determine the country's development and status (Mirilovic, 2015). Whether citizens are allowed to acquire dual citizenship, and how dual citizenship policy is implemented, not only relate to the rights and obligations of the country and its people. More importantly, they affect the political, economic, and legal development of that country.

Due to the different principles adopted by countries around the world to determine citizenship, the issue of dual citizenship varies across countries. For different political and economic purposes, the permissibility of dual citizenship differs across different countries. Many European and American countries have adopted a relatively tolerant attitudes towards the issue of dual citizenship because of a negative long-term population growth trend (Mateos, 2019; Schierup et al., 2008). For example, French individuals maintain their French citizenship even after obtaining citizenship from

another country. Foreign individuals are not required to relinquish their original citizenship upon acquiring French citizenship (Mateos, 2019).

Dual citizenship policies can be categorised into two distinct groups: authorisation of dual citizenship and prohibition of dual citizenship, as the Figure 3.1 shows. Authorisation of dual citizenship refers to the policy of governments allowing persons to possess numerous citizenships. Conversely, the prohibition of dual citizenship signifies that countries do not let individuals to acquire dual or multiple citizenships; otherwise, the person will lose his or her current citizenship. A sovereign State possesses the authority to bestow or withhold citizenship from its residents, so restricting their legal standing and treatment (Alarian et al., 2017; Prabhat, 2018).

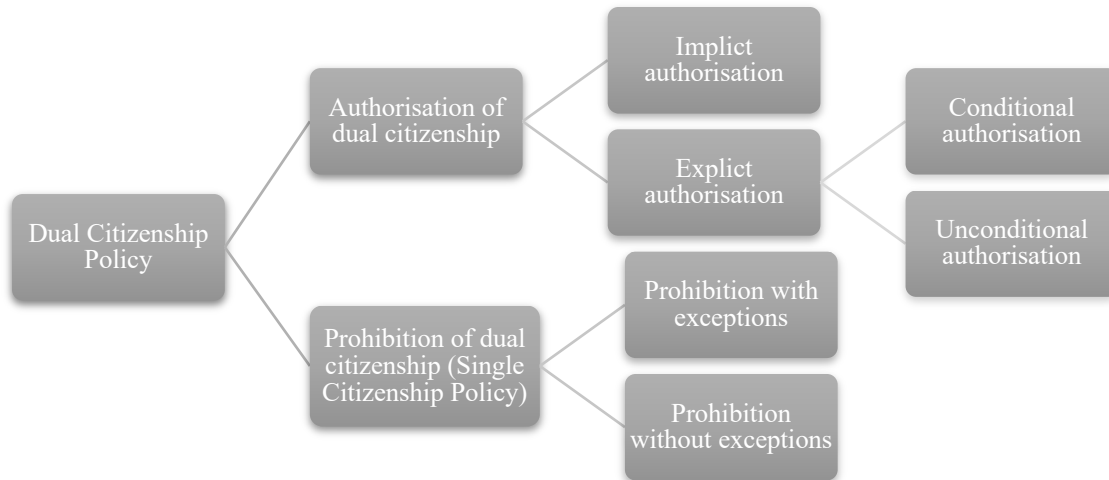
The policy of allowing dual citizenship refers to the fact that the country does not oppose the acquisition of foreign citizenship by its citizens. In this case, the acquisition of foreign citizenship does not affect the rights and obligations of its citizens. The country still regards them as its own citizens, and when those “dual citizenship” holders stay in the country, they usually do not enjoy the diplomatic protection rights offered by the dual citizenship country. Naturalised persons are not required to relinquish their original citizenship. There are no restrictions on the acquisition of newborn citizenship (Mirilovic, 2015; Schierup et al., 2008). The policy of the allowing of dual citizenship can be divided into implicit authorisation and explicit authorisation, depending on whether there are existing legal provisions or policies to state that the country allows the dual citizenship of persons in this country. Implicit authorisation means that the country does not have specific policies, regulations, or legal provisions to demonstrate that it allows dual citizenship. The country lacks relevant policies, regulations, or legal provisions which would indicate that it prohibits dual and multiple citizenships (Alarian et al., 2017; Mirilovic, 2015). Accordingly, people who hold dual citizenship in such a country are in fact (Alarian et al., 2017). Sometimes, implicit recognition is also known as allowing dual citizenship by default. By contrast, explicit recognition means that the country or its government has explicitly stated in its laws, provisions, policies, or government documents that it permits dual citizenship.

Explicit authorisation of the dual citizenship (policy) contains conditional authorisation; that is, conditions are attached to determine if a person can hold dual citizenship. In the conditional authorisation of dual citizenship policy, the allowance of dual citizenship is within a specific subject range or within a certain time, or there could be restrictions on people’s rights and obligations. An individual who meets the

conditions qualifies for dual citizenship identity. Otherwise, he or she is non-qualified for recognition of dual citizenship (Mirilovic, 2015; Schierup et al., 2008). The conditions attached to it could include the non-authorisation of dual citizenship of naturalised persons but the authorisation of dual citizenship of descendants entering foreign citizenship; scientists, artists, or people who have made outstanding contributions to the country can often more easily obtain dual citizenship; persons approved by the President can have dual citizenship identity; the country only permits foreign citizenship (as one of two or multiple citizenships of nationals) with countries that have bilateral agreements with it; and so on (Mirilovic, 2015; Spiro, 2019). In comparison, the unconditional authorisation of dual citizenship policy indicates that it does not matter which foreign citizenship citizens have at the same time, regardless of whether they are nationals, naturalised persons, newborns, or other types of citizens. As long as they have domestic citizenship, there are no time-related or other restrictions, and they will be treated equally (Mirilovic, 2015; Schierup et al., 2008).

A policy of prohibition of dual citizenship is also known as a single citizenship policy (Bertilsson et al., 2006; Manby, 2016a; Prabhat, 2018). Citizens can only hold citizenship of one country (Mirilovic, 2015; Schierup et al., 2008). If a citizen of such a country acquires foreign citizenship, he or she will lose the citizenship of this country. Naturalised people need to give up their initial citizenship in order to claim this country's citizenship, and newborns cannot obtain dual citizenship in any way (Mirilovic, 2015; Schierup et al., 2008). Some countries may have exceptions to allow a small number of people to hold dual citizenship; for example, Madagascar permits Malagasy children born abroad who acquire another citizenship to keep their dual citizenship until the age of 21, when they must choose which citizenship to keep (Republique de Madagascar, 1960). And in Seychelles, the government only recognises dual citizenship in specific cases concerning native born citizens of Seychelles who later obtain another citizenship for domestic or economic convenience (such as to work abroad), or involuntarily, through marriage to a foreign citizen (Citizenship of Seychelles Act, 1976)

**Figure 3.1: Types of Dual Citizenship Policy**



### **3.3 The Development of Dual Citizenship Policy**

This section aims to provide an overview of how dual citizenship policy has developed over time. It includes the historical evolution of dual citizenship policy and reflects on the countries that currently have this policy.

#### **3.3.1 Historical stages of dual citizenship policy**

The acceptance of dual citizenship and the implementation of dual citizenship policies have gone through a process of continuous development. In general, the development of dual citizenship can be divided into the following four historical stages.

First, there was a phase of no dual citizenship. At the beginning of the emergence of the nation-state (Tirtosudarmo, 2021), the population flow in and out of each country was relatively small, which was unlikely to cause compelling conflicts of interest among countries. At this time, dual citizenship had not become a social issue of concern (Alarian et al., 2017). So, no provisions on dual citizenship were enacted. The movement of population and the territorial changes caused by war increased the number of people with dual citizenship (Alarian et al., 2017; Shachar, 2012). As people with dual citizenship are citizens of two different countries at the same time, both countries require them to be loyal. If there is a war between the two countries, then those with dual citizenship will face an irreconcilable conflict of obligations. As early as 1812, Britain forced British people who had been naturalised in the United States to perform



military service according to the so-called "permanent loyalty principle," which resulted in a war between Britain and the United States (Shachar, 2012).

There were also many disputes between the United States and Prussia in the 19th century and between the United States and France in the early 20th century in connection with the military service of dual citizens (Alarian et al., 2017). In addition, situations arise where the rights and interests of persons with dual citizenship are damaged in a third country. Because both countries of citizenship have the right to exercise diplomatic protection, if the third country does not handle it properly, disputes will be raised between countries. This phenomenon was exacerbated by the territorial changes caused by the signing of the Treaty of Versailles and other peace treaties after the end of the First World War in 1919 (Alarian et al., 2017; Shachar, 2012). The frequent emergence of these conflicts gradually made governments aware of the pitfalls of dual citizenship.

The second phase was between the 1930s and the 1960s, a period when many countries implemented measures to minimise and prevent dual citizenship. Governments began to reach a consensus and sign multilateral treaties to avoid dual citizenship and the issues that may arise from it (Alarian et al., 2017; J. Blatter et al., 2009; Shachar, 2012). One of these treaties was the Convention on Certain Questions Relating to the Conflict of Nationality Laws 1930 adopted at the Hague Codification Conference of International Law in 1930, Article 4 of the Convention states that "A State may not afford diplomatic protection to one of its nationals against a State whose nationality such person also possesses" (League of Nations, 1930, p. 89).

In order to avoid conflicts of military duty, the Hague International Law Codification Conference of 1930 also adopted the Protocol Relating to Military Obligations in Certain Cases of Double Nationality (J. Blatter et al., 2009). There was also the Arab Nationality Convention of 1954, and the Convention on the Reduction of Cases of Multiple Nationality and on Military Obligations in Cases of Multiple Nationality by the Council of Europe in 1963, both of which aimed to eliminate dual citizenship and its associated disadvantages. In 1957, the UN General Assembly passed the Convention on the Nationality of Married Women, which stipulated that marrying a foreigner does not affect the wife's citizenship, in order to avoid dual citizenship (J. Blatter et al., 2009; "Nationality and Statelessness under International Law," 2014). With the exception of some countries within the Commonwealth (formerly the British Empire), many countries have adopted legislation and policies that do not recognise

dual citizenship as a way to avoid dual citizenship. For a long time, the majority of countries were opposed to dual citizenship (Alarian et al., 2017). That said, although the above treaties and citizenship Acts were designed to avoid the occurrence of dual citizenship, due to the different principles and regulations of citizenship grants in various countries, they could only reduce dual citizenship and its adverse effects to a certain extent. Dual citizenship was not wholly eliminated (J. Blatter et al., 2009).

The third phase is the post-colonial era, which saw the emergence of the dual citizenship system in former colonies after independence and the removal of the original colonial power. After the Second World War ended in 1945, a wave of national liberation movements seeking colonial independence was set off across the world. Each colony became independent from the original colonial suzerain and established an independent state. By the 1980s, nearly a hundred countries had become independent. During the colonial era, a large number of colonists immigrated to the colonial land to serve as local labour (Alarian et al., 2017; Shachar, 2012). Many colonial citizens also migrated to colonies to engage in their management or other work and settle there (Alarian et al., 2017). In particular, the United Kingdom, which once had the most colonies, decided that after the independence of the colonies, workers from the colonies moving to the United Kingdom could be naturalised as British citizens. It was also desirable to maintain contact with citizens who had migrated from their home countries to settle in the post-independence countries, allowing UK emigrants to retain British citizenship, whether or not they had acquired citizenship in the newly independent State. Accordingly, the UK could continue to exert influence over the newly independent countries (Kiwan, 2005; Prabhat, 2018).

At the same time, some newly independent countries within the Commonwealth (the association of countries mostly made up of the UK and its former colonies) also allowed their citizens to maintain British citizenship. For example, the Canadian Nationality Act 1977 stipulates that Canadian citizens would not lose their Canadian citizenship after acquiring another citizenship (Prabhat, 2018). The UK also stipulated in the British Nationality Act 1948 that British citizenship was available to the United Kingdom and colonial citizens (Prabhat, 2018; Schierup et al., 2008). In France, the more recent French Citizenship Law of 1986 also adopted *jus sanguinis* and confirmed that no matter how French people acquire foreign citizenship, they would not lose French citizenship (Schierup et al., 2008). It seems that colonisation and decolonisation

are behind the rise in dual citizenship. But other chapters of the thesis will argue that it is more complicated than that.

The fourth stage is the development of dual citizenship and its system in the post-immigrant era, the post-Soviet era, and the era of globalisation. The post-immigrant era, the post-Soviet era, and the era of globalisation are mainly divided by scholars according to the different trends in the formation of dual citizenship and the different countries involved (J. Blatter et al., 2009; Faist, 2004; Mateos, 2019). The post-immigration era refers to the period of large immigration flows in the world. Many countries had dual citizenship policies during this period. The post-Soviet era refers to the territorial division of successor states after the collapse of the Soviet Union and its communist allies in Europe. Some territories and peoples were separated when these states became independent. The new governments hoped to continue to protect all people from the Soviet Union, accompanied by a policy of dual citizenship (Archibugi, 2008; Schlenker et al., 2017).

Meanwhile, the development of the dual citizenship system in the era of globalisation refers to the phenomenon in recent decades where countries around the world have generally see economic globalisation as an opportunity to promote their own economic and social development. An increasing number of countries gradually changing their original citizenship policy and recognising dual citizenship (Harpaz, 2019; Schlenker et al., 2017).

These phenomena cover roughly the same period in time: from the end of the 20<sup>th</sup> century to the present. The large-scale population movement and territorial changes which have happened during this period have rendered the issue of dual citizenship increasingly prominent. Simply avoiding dual citizenship has become impossible (J. Blatter et al., 2009; Faist, 2004; Mateos, 2019). In this context, the number of countries offering dual citizenship continues to grow.

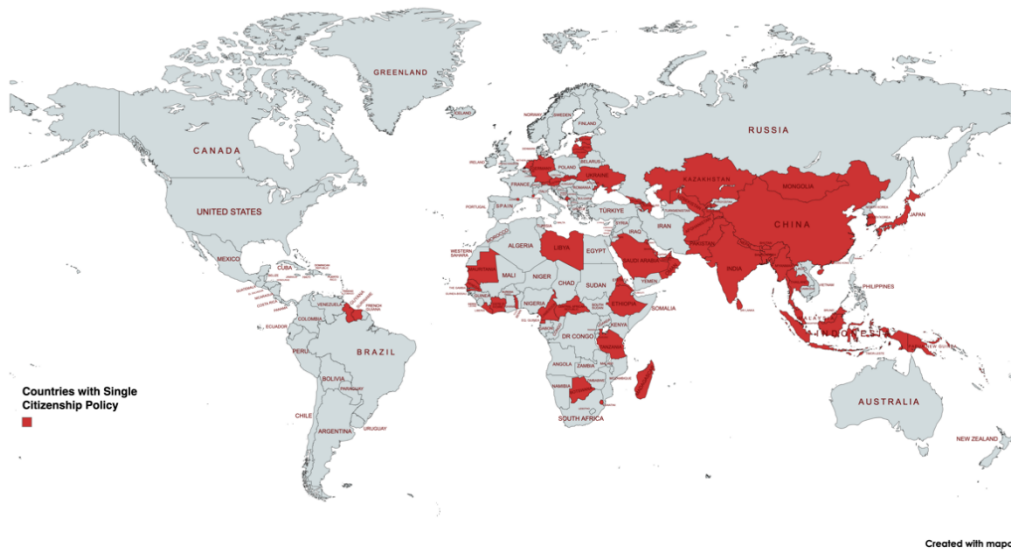
### 3.3.2 Contemporary world map of countries with dual citizenship policies

In the 21st century, responding to the robust academic research and statistical data amassed during the 1970s–1990s, the scientific study and statistical analysis of dual citizenship developed significantly, based both on data of countries accepting dual citizenship and the number of dual citizens (Papazoglou, 2010; R. M. Smith, 2011). Nevertheless, the data on each country is not complete. In some regional databases, there is a lack of data for some countries, such as the OECD database. In some single-

case studies or comparative case reports, only a certain number of countries are included, and the circumstances of countries all over the world cannot be entirely accurately discussed. The policies, regulations, laws, and constitutions of each country can also be updated regarding dual citizenship. Therefore, to more accurately count the countries that currently have dual citizenship policies in the world, this thesis conducts a count of 195 countries around the world. By combining some previously calculated data and research materials (Smith, 2003, 2011; Escobar, 2007; Rubenstein, 2007; Papazoglou, 2010; Pogonyi, 2011; Harpaz, 2015, 2018; Balta and Altan-Olcay, 2016; Harpaz and Mateos, 2018, etc.), and searching the Internet for relevant data, the thesis has verified the policies, laws, regulations, and constitutional position on the management of dual citizenship in various countries as of 2019.

The data on "195 countries in the world" is based on the statistics of the United Nations regarding officially recognised countries, in total comprising 193 countries that are member states of the United Nations and another two countries that are non-member observer states: the Holy See and the State of Palestine. All of them are fully recognised states, but this list does not include some 60 dependent areas, and several disputed territories, such as Kosovo. The following statistics are divided into "countries with dual citizenship policies" and "countries rejecting dual citizenship policies" (countries with single-citizenship policies). As has been discussed above, countries that have adopted dual citizenship policies have done so via either explicit authorisation or implicit authorisation; the explicit authorisation further includes conditional authorisation and unconditional authorisation. Non-authorisation (prohibition) dual citizenship contain prohibition without exceptions, and prohibition with exceptions. The following count does not list these conditions in detail - these details will be elaborated in the following empirical inquiry. The count data here only distinguishes between countries adopting dual citizenship policies and countries with non-adopted dual citizenship policies (single citizenship policies). Figure 3.2 shows, by colour, the situation of countries in the world with dual citizenship policies and non-dual (single) citizenship policies.

**Figure 3.2: World Map of Countries with Dual Citizenship Policies in 2019**



Notes: Grey = countries with dual citizenship policies; Red = countries with single citizenship policies

In the post-World War II period and as of 2019, 67 countries have switched from single citizenship policies to dual citizenship policies, accounting for 34% of all countries worldwide (countries details can be found in Appendix 1). As of 2019, no country has officially transitioned from allowing citizens to legally possess two or more citizenships (dual citizenship policy) to prohibiting citizens from holding two or more citizenships (single citizenship policy). In this context, “allowing citizens to legally possess two or more citizenships” is to that when a person acquires citizenship of another country, they will not instantly forfeit or be stripped of their original citizenship. This applies even when a foreigner becomes a naturalised citizen, as they are not required to renounce their previous citizenship<sup>6</sup>.

Overall, taking all 195 countries together, 69% of countries, or over two-thirds of all countries in the world, have dual citizenship policies. Only 31% of countries run single citizenship policies. Of those not allowing dual citizenship policies, most are in Asia and Africa, and several are in Oceania. During 1945–2019, 34 percent of countries changed their citizenship policies from single to dual citizenship. The tables in the

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<sup>6</sup> The following instances do not involve a country officially transitioning from a policy of allowing dual citizenship to a policy of only permitting single citizenship: a country has a reciprocal agreement with another country that permits citizens of both countries to possess dual citizenship. These agreements are ended when either party withdraws.

appendix show country specifics.

### **3.4 Theoretical Insights into Dual Citizenship Policy**

This section discusses how the theoretical frameworks outlined in Chapter 2.4 provide normative underpinnings for understanding dual citizenship policies. Specifically, section 3.4.1 analyses how post / transnational perspectives support the adoption of dual citizenship as a recognition of multiple identities and global mobility, while communitarian and nationalist views might highlight the challenges dual citizenship policy poses to national solidarity and identity. Section 3.4.2 examines how the theoretical perspectives influence real-world citizenship policies. It utilises specific country cases to illustrate how the interplay of nationalism, global norms, communal values, and republican ideals shapes the debates and decisions regarding single versus dual citizenship policies.

#### **3.4.1 Normative frameworks and dual citizenship**

The concept of dual citizenship has grown in importance in the age of globalisation, challenging traditional viewpoints about nationality and statehood. This phenomena can be examined using several theoretical frameworks, such as nationalism and citizenship, post / transnational citizenship, communitarian viewpoints, and republican citizenship. These frameworks provide a deeper understanding of the principles that support dual citizenship laws. They examine how these policies address or oppose the challenges posed by identity, movement, and civic participation in a globalised society.

Smith's ethno-symbolic approach to nationalism serves as a vital basis for comprehending the ramifications of dual citizenship in the context of national identity and citizenship policies. According to Smith (1989), nations are more than just political organisations; they are profoundly founded in pre-existing ethnic communities that share a common history, culture, and symbols. This viewpoint emphasises the importance of historical and cultural settings in establishing citizenship policy, as ethno-symbolic elements of nationalism shape national identity and collective memory (A. D. Smith, 1995). Dual citizenship, from this perspective, might be interpreted as a threat to the traditional, homogeneous concept of nationhood, complicating the collective national narrative. However, Smith's theory implies that acknowledging diverse allegiances can enrich the national fabric, as long as they add to the nation's overall story (A. D. Smith, 1995).

Soysal (1994) and Benhabib (2004) study theories of postnational and transnational citizenship, which call into question the traditional view of citizenship focused on the nation-state. They believed that in the age of globalisation, the concept of citizenship is less constrained by the legal and geographical borders of nation states. The process of dissociation is made easier by the presence of global human rights frameworks and the growing significance of supranational bodies (Benhabib, 2004; Soysal, 1994). These viewpoints endorse the adoption of dual citizenship as a means of acknowledging various identities and facilitating global movement. Dual citizenship policies are advocated to address the issues brought by global mobility (Benhabib, 2009). Through these policies, people can maintain ties to their home nations while also integrating into their newly arrived countries. This framework advocates for a broader and adaptable comprehension of citizenship, recognising the interdependence and changeability of contemporary identities.

Miller's communitarian perspective highlights the significance of collective identity and the welfare of the community within the framework of citizenship (Miller, 1995). This viewpoint is especially pertinent when considering dual citizenship, as it emphasises the possible difficulties that dual citizenship presents to national unity and sense of self. Miller (1995) asserts that citizenship encompasses not just entitlements but also obligations towards the society, highlighting the importance of social unity and collective principles. From a communitarian perspective, dual citizenship may be regarded with scepticism due to its potential to weaken the sense of belonging and dedication to the well-being of the community. Nevertheless, Miller (2016) also acknowledges the heterogeneity within communities and the possibility of implementing inclusive policies that reflect the complex and varied aspects of identity while still preserving social unity.

Bellamy (2008) posits that the republican theory of citizenship emphasises the importance of individuals actively participating in civic affairs and advancing the common welfare. This perspective is crucial for comprehending the ramifications of dual citizenship on political engagement and civic duty. Bellamy promotes a citizenship paradigm that prioritises active involvement in public affairs. He suggests that dual citizens have the ability to enhance the democratic process by contributing varied viewpoints and experiences to the public realm (Bellamy, 2008). Nevertheless, the republican model also prompts inquiries concerning the allegiance and civic obligations of individuals who hold dual citizenship, particularly with regards to their involvement

in different political frameworks (Bohman, 2001; Follesdal, 2002; Hanasz, 2006). It is necessary to reassess citizenship regulations in order to promote active participation and accountability, establishing a collective sense of purpose among all citizens, regardless of their dual status.

Through the prisms of nationalism, post / transnationalism, communitarianism, and republicanism, the study of dual citizenship exposes a complex web of interrelated forces that shape citizenship laws in the age of globalisation. Every theoretical viewpoint sheds light on the benefits and constraints that dual citizenship poses for national identity, international mobility, and civic engagement while offering insightful analysis of the normative foundations of the practice. Policymakers and academics can better negotiate the complex terrain of dual citizenship and create policies that take into account the reality of our globalised society by interacting with these theories.

#### 3.4.2 Policy implications of theoretical perspectives

The exploration of citizenship policies, particularly in the context of single and dual citizenship, requires a deep understanding of various theoretical perspectives. The interplay of nationalism, global norms, communal values, and republican ideals significantly influences these policies. This discussion draws upon the theories of Smith, Soysal, Benhabib, Miller, and Bellamy to examine how these theoretical frameworks shape citizenship debates and decisions in specific country contexts.

Smith's theory on the impact of nationalism on citizenship policies emphasises the importance of a robust national identity and unity (A. D. Smith, 1995). According to this perspective, countries implement single citizenship policies to foster national homogeneity and safeguard sovereignty. In Japan, the citizenship laws are notably stringent, reflecting a nationalist ideology that values cultural and ethnic homogeneity. These laws, which include demanding naturalisation requirements such as long residency periods, language proficiency, and cultural assimilation, signify Japan's commitment to maintaining a homogeneous national identity. This approach aims to ensure social cohesion and stability by prioritizing a unified national culture and identity (Sugimoto, 2020).

France exemplifies Smith's thesis, as the notion of citizenship is intricately linked to the fundamental ideas of the French Republic, specifically liberty, equality, and fraternity. Unlike Japan's ethnic-based nationalism, French nationalism is ideologically rooted in the legacy of the French Revolution, emphasizing civic values and a secular



public domain (Weil, 2020). French citizenship policy, therefore, promotes assimilation, where individuals are expected to adopt French values and the public culture, contributing to a unified national identity despite ethnic diversity (de la Pradelle, 2002). This policy underscores the belief in a cohesive national identity, forged not by ethnic homogeneity but through adherence to republican values.

Both Japan and France's approaches to citizenship and national identity, while different in their cultural and ideological underpinnings, highlight the broader nationalist agenda of using citizenship policies to cultivate a strong, unified national identity. These policies, whether focusing on cultural homogeneity or civic integration, demonstrate the importance of nationalism in determining the state's approach to citizenship and sovereignty.

Soysal and Benhabib's framework on post / transnational citizenship examines the impact of global norms and human rights discourses on national citizenship policies, advocating for a world where citizenship extends beyond traditional national boundaries. Sweden exemplifies the influence of transnational norms on national citizenship policies. Swedish citizenship law has evolved to be more inclusive, reflecting a shift away from a uniform national identity and towards one that values variety and multiculturalism. This evolution is partly due to Sweden's engagement with global human rights discourses and its commitment to international conventions on statelessness and the rights of migrants (Spiro, 2008). Sweden's recognition of dual citizenship reflects its broader societal principles, which prioritise individual rights, equality, and immigrants' absorption into the national fabric (Spiro, 2008).

In Canada, dual citizenship policy is emblematic of a longstanding commitment to inclusivity and multiculturalism, resonating with global human rights norms. Canada's approach to citizenship is based on the fundamental belief that a varied and cosmopolitan society enhances the country. The policy enables individuals to retain their original citizenship while becoming Canadian, acknowledging and celebrating the multicultural and pluralistic nature of Canadian society (Kymlicka & Wayland, 1996). This approach is aligned with global norms advocating for the recognition of diverse identities and the protection of individual rights, facilitating a more inclusive and participatory national identity.

Both Sweden and Canada's dual citizenship policies underscore a significant shift in understanding and implementing citizenship in the modern era, where global norms and human rights discourses have a profound influence. These policies reflect a

transition towards more inclusive and diverse national identities, in line with post / transnational citizenship theories that advocate for the acknowledgment of multiple identities and global inclusivity.

Miller's communitarian perspective on citizenship emphasises the pivotal role of communal values, shared traditions, and collective identity in shaping citizenship policies. This theoretical framework argues that the fundamental nature of citizenship goes beyond legal regulations and becomes deeply ingrained in the cultural and historical context of a community (Miller, 1995, 2016). This perspective is vividly illustrated in the citizenship policies of Israel and Switzerland, where communal values and traditions play a significant role in defining who belongs to the nation.

In Israel, the Law of Return and citizenship policy exemplify a communitarian perspective, where the state's concept of citizenship is firmly based on Jewish community identification. The Law of Return, enacted in 1950, grants every individual of Jewish descent, regardless of their location, the privilege to come to Israel and acquire citizenship, thereby emphasising the deep connection between Jewish ancestry and Israeli citizenship (Shafir & Peled, 2002). This policy reflects the collective memory, historical experiences, and cultural ties of the Jewish people, emphasizing the importance of a shared communal identity in determining the contours of national belonging. Switzerland provides another compelling example of communitarianism in action, where citizenship policies are heavily influenced by local traditions and direct democracy. Unlike Israel's ethno-religious basis for citizenship, Switzerland's approach is grounded in the principle of cantonal consent, where local communities have substantial say in citizenship matters (Helbling, 2008). This approach facilitates direct democratic involvement in matters of citizenship since the process of naturalisation often necessitates endorsement by the cantonal or communal authorities. This framework exemplifies the Swiss communitarian spirit by giving priority to regional traditions, direct democracy, and community consensus when shaping the country's citizenship policies (Helbling, 2008).

Both Israel and Switzerland, despite their distinct contexts, manifest Miller's communitarian perspective by integrating communal values and shared traditions into their citizenship policies. These policies not only define the legal parameters of belonging but also encapsulate the cultural and historical essence of the national community, highlighting the interplay between legal norms and communal identity in the realm of citizenship.

Furthermore, Miller's communitarian viewpoint on citizenship, which emphasises the importance of communal values, shared traditions, and collective identity, is seen in some dual citizenship legislation that impose limitations. In such a country, only citizens of domestic descent are permitted to hold multiple citizenships, while individuals of foreign descent are prohibited from having dual citizenship. Additionally, foreigners are required to renounce their previous citizenship upon naturalization (Schlenker et al., 2017). The implementation of this restricted dual citizenship policies demonstrates the country's commitment to maintaining a strong sense of national identity and solidarity. Citizens of domestic origin have stronger connections to their own nation in comparison to citizens of foreign origin, regarding the communal values and collective identity. Shared traditions and social ideals facilitate the formation and preservation of national cohesion. Thus, even if these descendants citizens possess several citizenships, the home country is less concerned, as they are more likely to maintain a connection and allegiance to the country compared to naturalised citizens of foreign descent (Schierup et al., 2008; Schlenker et al., 2017). Some examples of such countries are Belize, Comoros, and Gambia.

Bellamy's concept of republican citizenship, which underscores civic engagement, political participation (Bellamy, 2008), and the public good, finds resonance in countries like the United States and Italy, where citizenship policies are crafted to foster civic unity and active participation. Citizenship in the United States is largely built on a republican heritage that values civic virtue, political involvement, and a devotion to the common good. American citizenship policies emphasise the values of democracy and civic responsibility, encouraging citizens to participate in democratic processes like as voting and jury duty, as well as community service. The United States educational system contributes significantly to teaching these ideals by providing civic education that highlights citizens' rights and responsibilities within a democratic framework (De Tocqueville, 2003, 2015). This emphasis on active involvement seeks to build a public that is knowledgeable, involved, and committed to republican ideas, reflecting the essential values of American political culture

Italy, similarly, enforces citizenship laws that highlight the importance of civic contribution and cultural integration. Italian citizenship is not solely about legal recognition but entails an engagement with the cultural and civic life of the nation. The Italian approach to citizenship advocates for a republican model, wherein active participation in the public sphere is seen as significant for the development of a

cohesive and dynamic society (Schierup et al., 2008). Through mechanisms like civic education and integration programs, Italy fosters a sense of belonging and encourages contributions to the public good, aligning with the republican ideal of participatory citizenship (Schierup et al., 2008). Both the United States and Italy embody the principles of republican citizenship, advocating for a model of citizenship where active engagement in public life is crucial. These countries' policies emphasise the importance of civic education, political involvement, and devotion to the public good, demonstrating how republican citizenship may shape and strengthen a country's civic identity.

The introduction of a constituency for expatriates (expats) in some countries is also a policy practice that reflect republican model, advocating for active civic participation and political engagement, underscoring the role of citizenship in fostering a vibrant democratic society. Examples of how countries implement constituencies for expatriates, including the single global constituency and country or region-specific constituencies models (Häggrot, 2023; Tager, 2006). France is a notable example of a country that has implemented a single global constituency for its expatriates, although it also divides this global presence into several distinct constituencies for practical and representative purposes. French citizens living abroad vote for their own set of representatives in the French National Assembly, with the entire globe divided into 11 constituencies for the election of deputies representing French citizens outside France. While this seems like multiple constituencies, it operates under the principle of a single global constituency concept where all expatriates are represented in the national legislature (Collard, 2013). Portugal, conversely, has explicitly defined multiple constituencies based on geographic regions, reflecting a country or region-specific approach to expatriate representation. Portugal runs a system where expatriates are represented in specific constituencies. Portuguese expatriates participate in elections through two distinct constituencies: one designated for Europe and another for the remaining regions of the world. These constituencies elect members to the Portuguese Parliament, ensuring representation of the diaspora based on their regional location (Yamauchi & Sekiyama, 2024).

Countries that establish constituencies for expatriates (expats) often operate under democratic regimes, as the creation of such constituencies typically aligns with democratic principles of political representation and inclusivity (Disch, 2012). Democratic governments are more inclined to acknowledge the significance of

guaranteeing that every person, irrespective of their place of residence, possesses the entitlement to engage in the political process and exert influence over government decisions. They are more likely to extend voting rights to their citizens living abroad, acknowledging that these individuals retain their citizenship rights and should have a say in the political affairs of their home country (Disch, 2012; Häggrot, 2023).

However, it's important to note that while democratic regimes are more commonly associated with expat constituencies, the practice is not exclusively limited to democracies. Some non-democratic or semi-democratic countries may also establish expat constituencies, potentially for strategic reasons, such as maintaining a connection with their diaspora for economic, political, or diplomatic purposes (Bollen, 1983; Case, 1993). Algeria, which has had periods of authoritarian rule, allows its expatriates to vote and has established constituencies abroad. The country has a history of engaging its large diaspora in national elections, although the political context and freedoms within which this occurs are different from those in democratic countries (Brown, 2018; Devernois, 1958). Rwanda, often classified as authoritarian due to limited political opposition and controlled electoral processes, has also made provisions for its citizens abroad to participate in national elections (Hartmann, 2018).

Democratic regimes, which often promote global engagement and value the contributions of their citizens worldwide, tend to be more open to establishing mechanisms like expat constituencies. These constituencies demonstrate an awareness of the globalised character of contemporary society and the interdependence of individuals residing inside and beyond national borders. This also reflects the post-transnational perspective, promoting inclusivity and diversity and acknowledging the changing realities of global citizenship and the importance of accommodating multiple allegiances (Faist, 2000b; Spiro, 2016). Additionally, it was influenced by the prevailing political ideology of the country throughout that period. Left-wing or liberal parties might support these constituencies and dual citizenship as part of a broader agenda promoting inclusivity, global mobility, and transnational rights (Day & Shaw, 2006).

In contrast, in less democratic contexts, the establishment of expat constituencies does not necessarily translate to liberal dual citizenship policies. Instead, these regimes may adopt a selective approach, granting dual citizenship rights to individuals or groups perceived as loyal or beneficial to the state while denying them to others deemed as political threats or of less strategic value. In this case, nationalist approaches on

citizenship are preferred. Citizenship policy prioritises cultural and ideological homogeneity to maintain a cohesive national narrative. The engagement with the diaspora often comes with strings attached, where political rights, including the right to hold dual citizenship, might be conditional on certain behaviors, such as political loyalty, economic investment, or adherence to state-promoted norms and values (Bollen, 1983; Brown, 2018; Case, 1993). Similarly, right-wing or nationalist parties may view expat constituencies and dual citizenship skeptically, fearing that these policies could dilute national identity, sovereignty, and the integrity of the political system. Their support for such policies might be contingent on broader geopolitical strategies or economic interests rather than ideological compatibility (Zaslove, 2006).

Therefore, the introduction of a constituency for expatriates (expats) in some countries reflects republican model, advocating for active civic participation and political engagement, underscoring the role of citizenship in fostering a vibrant democratic society. However, in democracies or under the influence of left-wing or liberal parties, they may support these constituencies and dual citizenship as part of a broader agenda promoting inclusivity, global mobility, and transnational rights, aligning with post-transnational theories. In less democratic contexts or with the right-wing or nationalist parties' impact, the nationalist approaches are prioritised: national cohesion is the first.

## **Conclusion**

In summary, citizenship reflects an individual's political membership in the political community, and dual citizenship refers to a situation where a person has citizenship of two or more countries at the same time. Countries can use *Jus sanguinis*, *Jus soli* or a mix between the two to determine people's citizenship. People can also acquire citizenship on their own initiative, via naturalisation. Naturalisation includes "involuntary" circumstances, such as marriage, adoption, or territorial changes. Dual citizenship emerged due to the interweaving of various national policies of citizenship, especially when political and economic exchanges between countries became more frequent.

Dual citizenship policies address the increase in dual citizenship, covering legal documents, government regulations, and policies to manage dual citizenship. These policies can be divided into the allowance (authorisation) and prohibition of dual citizenship. In policies involving the authorisation of dual citizenship, there are implicit

and explicit forms of authorisation. Explicit authorisation includes unconditional and conditional authorisation. In terms of the prohibition of dual citizenship, also named a single citizenship policy, there is prohibition without exceptions, and prohibition with exceptions. The development of dual citizenship policies is an ongoing process of change with the development of society and political economy. In contemporary times up until 2019, 134 countries have dual citizenship policy, and 61 countries ran single citizenship policy, making up 69% and 31% of countries respectively. The number of countries that allow dual citizenship exceeds double the number of countries that do not. During 1945–2019, one-third of countries in the world changed their citizenship policy from single to dual citizenship.

The theoretical insights from the lenses of nationalism, post-transnationalism, communitarianism, and republicanism offer a nuanced understanding of how countries navigate the complexities of national identity, global interconnectedness, and civic participation in their citizenship policies. There is a tension between the preservation of national solidarity, as emphasised by nationalist and communitarian perspectives, and the recognition of pluralistic identities and global mobility, as advocated by post-transnational and republican theories.

Nationalist approaches, as seen in the examples of Japan and France, often prioritise cultural and ideological homogeneity to maintain a cohesive national narrative. In contrast, the post-transnational perspective, exemplified by Sweden and Canada, promotes inclusivity and diversity, acknowledging the changing realities of global citizenship and the importance of accommodating multiple allegiances. Communitarianism, with its emphasis on shared values and collective identity, presents a critical standpoint in understanding citizenship policies, particularly in countries like Israel and Switzerland, where communal traditions and democratic engagement deeply influence notions of belonging. Due to their shared values and collective identity, some countries with dual citizenship policies also favour citizens of domestic descent. Citizens of national descent can hold dual citizenship, whereas those of foreign descent cannot. The republican model, illustrated by the policies in the United States and Italy, advocates for active civic participation and political engagement, underscoring the role of citizenship in fostering a vibrant democratic society. Establishing constituencies for expatriates is also an interesting political practice that reflects the republican model, but in different situations, it could incorporate the nationalist approach and the post-transnational standpoint.

The interplay of these theoretical frameworks not only shapes the practical implementation of citizenship policies but also raises important normative questions about the nature of belonging, loyalty, and participation in an increasingly interconnected world. Policymakers and scholars must therefore engage with these diverse theoretical perspectives to develop citizenship policies that not only address the challenges of globalisation but also reflect the evolving conceptions of identity, community, and democracy.



## **CHAPTER 4**

### **WHY COUNTRIES HAVE A DUAL CITIZENSHIP POLICY: AN ANALYTICAL FRAMEWORK**

This chapter discusses the factors that may influence a country's having dual citizenship policies or not. It draws from the literature at first, and then build arguments as the theoretical foundations for the subsequent hypotheses. Country cases are referred to in the factors discussion, to better explain how the various factors associated with having a dual citizenship policy. Prior to formulating the hypothesis, a short mechanism summary is provided to illustrate the association between the factor and having a dual citizenship policy by a country. Every factor contributes to the formation of a hypothesis.

This chapter categorises potential factors into three categories: economic, political, and cultural. Each factor may encompass elements of the other two categories to varying extents. The classification is mainly determined based on the function and purpose of the factors identified in this thesis. For instance, the second factor (which is discussed below) – "human capital", which is in the economic category – could also be implicated in political or cultural aspects such as migration management. However, this thesis principally considers human capital's role in a country's economy in considering the dual citizenship policy topic. Therefore, the factor of "human capital" is categorised as economic.

#### **4.1 Economic Factors**

Economic factors include the factors of physical capital and human capital. In the field of economics, there are two types of capital: physical or material capital, and human capital. Physical capital refers to the long-term existence of production materials, such as machines, equipment, factories, buildings, transportation facilities, as well as money. In the traditional industrial economy, physical capital occupies a dominant position (Fukuyama et al., 2018; C. Turner et al., 2013). Human capital refers to people themselves, the skills and education they hold, as well as all their knowledge. With a development of the economy and the advent of the knowledge economy, human capital exceeds physical capital in terms of quantity and income, thereby replacing the dominant position once occupied by physical capital (Fukuyama et al., 2018; Van den

Berg, 2016).

Countries want to achieve economic growth (Kim, 2019; Prabhat, 2018; Rubenstein, 2007; Schierup et al., 2008), and to do so they need a certain increase in the national physical and human capital. Implementing a policy of dual citizenship can serve as a catalyst for attracting increased investment from individuals, who can contribute their resources and expertise to the country. Therefore, higher physical capital and higher human capital favour having a dual citizenship policy.

#### 4.1.1 Physical capital

As was mentioned in the previous section, physical capital refers to the long-term existence of production materials, such as machines, equipment, factories, buildings, transportation facilities, and money (Fukuyama et al., 2018; C. Turner et al., 2013). The importance of physical capital is reflected in its limited substitution; that is, it is difficult to replace with other kinds of capital. To a certain extent, physical capital is irreplaceable in economic growth (Van den Berg, 2016).

Physical capital is the material basis and condition for economic growth and development. In ancient times, human ancestors caught fish by hand and directly climbed branches to pick fruits. Very little material capital was required to do so. In agricultural society, handicraft production tools were simple, and physical capital outside land was also minimal. After humans entered industrial society, many resources were used first to produce the means of production, and then to introduce and use new production methods to produce consumer goods (Holz and Sun, 2018). Therefore, the production efficiency and output of consumer goods continues to increase substantially. The development of human society to this day is still advancing along this ever-higher production line, and the resources used to produce new means of production have shown a continuous upward trend (Holz and Sun, 2018; Le Van et al., 2018). Although the development of new technology has started taking on a greater importance, physical capital remains an indispensable basis of production and economic growth (Fukuyama et al., 2018).

Physical capital is even more relevant for developing countries, which is why more and more developing countries have begun to accept the dual citizenship policy in recent years, in order to develop the country's physical capital and overall competitiveness (J. Blatter et al., 2009; Herzog, 2014). There are three reasons for this. First, the economic activities of developing countries are scattered. Inventory is a

crucial element of physical capital. A large amount of inventory is needed to avoid interrupting the reproduction process (Le Van et al., 2018). Kingleberger and Herrick (1983) pointed out that: "India's household establishment industry is scattered in thousands of locations, and the cost of inventory is high, so development is hindered." The situation of Chinese townships and village enterprises is very similar to that of India.

Second, production specialisation and the division of labour in developing countries remain underdeveloped. Compared with developed countries, an economy of the same size in a developing country requires a larger amount of material capital. In a production unit that is only engaged in the production of a single product, only one set of production equipment and production tools is required (C. Turner et al., 2013). However, in a production unit that produces multiple products at the same time, the correlation between the products is not very strong. Although some power equipment can be shared, more sets of processing machinery and tools are required (C. Turner et al., 2013; Van den Berg, 2016). In developing countries with underdeveloped specialisation and poor division of labour, everything from a small manufacturing enterprise to a city and a region is still a self-contained system. A small but complete and large and complete production and operation structure will lead to a high rate of assimilation and the repetition of material capital such as machinery and equipment. In this production pattern, a certain amount of total social output requires the use and consumption of a higher amount of physical capital, compared to the production pattern of a specialised division of labour (Harpaz, 2015; Holz & Sun, 2018; C. Turner et al., 2013).

Third, developing countries have greater capital waste in that the ratio of capital to income is higher. Although developing countries have accumulated a large amount of physical capital, it has not been carefully used and has been hugely wasted. For example, workers are often not skilled, and operating tools are not designed; there is also an overload of cars and an overloaded operation of machines; roads, buildings and other equipment have generally also not been carefully maintained (Le Van et al., 2018; Naujoks, 2015). Therefore, the depreciation rate is high in developing countries. In particular, the market mechanism is not perfect, and market information is incomplete and often untrue. There is also a lack of scientific decision-making, industry experience, and so forth, resulting in widespread bad investments (Naujoks, 2015). According to Dai and Wang (2018), during 2016-2018, China's cement consumption accounted for

half of the world's total consumption, and its steel consumption accounted for 30% of the world's total consumption, yet the total output accounted for only 4% of the global total.

In the last four decades, more developing countries have started to adopt a dual citizenship policy to strengthen their physical capital and overall competitiveness. For developing countries, dual citizenship can encourage remittances from citizens working abroad. These remittances can be a significant source of foreign currency and economic stability (Chow & Mathien, 2018; Sricharoen, 2020). Dual citizens also might be more likely to visit the country of their second citizenship, thereby boosting tourism and associated economic benefits (Harpaz, 2015; Rubenstein, 2007). Furthermore, dual citizenship can be a way to engage the diaspora in the economic development of the country. This can include not just remittances, but also transfer of skills, knowledge, and business connections (Harpaz, 2015, 2019; Harpaz & Mateos, 2018). To give some examples, Cambodia granted temporary citizenship to some Chinese citizens who had come to invest in Cambodia in 1995 (Liang & Liu, 2009). On 29th August 2002, Pakistan announced the implementation of a dual citizenship recognition policy for Pakistanis who had acquired United States or Swedish citizenship. Similarly, in 1990, to encourage foreign investors, the Tongan government amended the Nationality and Naturalisation Law to permit foreigners holding a passport of a protected person issued by the Tongan government to apply for naturalisation (Margiotta & Vonk, 2010; Naujoks, 2015).

Overall, many countries began to leave more flexible space for their nationals to hold dual citizenship. The countries which the policy allowed to hold their citizenships (at the same time) are mostly targeted rich countries, as the host country assumes that people from developed countries hold more physical capital and can invest more in the host country. In the above example, Pakistan permits the dual citizenship of Pakistanis who have acquired United States or Swedish citizenship – both of which are wealthy developed countries. The primary reason for introducing policies to allow some citizens to hold dual citizenship is to attract foreign investment, and therefore improve the economy and other aspects of host countries (Harpaz, 2015; Spiro, 2019).

Economic growth occurs as a result of increases in the production of goods and services. Physical capital refers to the long-term existence of production materials, such as machines and money. In industrial society, physical capital is used first to produce the means of production, and then to introduce and use new production methods to

produce consumer goods. The production efficiency and the output of consumer goods have accordingly continued to increase substantially. The adoption of dual citizenship policies is positively associated with the need to enhance their physical capital base and overall economic competitiveness. Specifically, these countries may use dual citizenship as a strategic policy instrument to recruit and retain persons who can bring in substantial physical resources, such as financial investments, and advanced machines. This influx of resources from dual nationals is anticipated to bolster the host country's physical capital, thereby stimulating economic growth and development. Based on these arguments, this study hypothesises that:

H1: Higher physical capital favours having a dual citizenship policy.

#### 4.1.2 Human capital

Human capital refers to the population, the skills, education, and knowledge people hold. Today's national economic development is grounded in the cooperation between physical capital and human capital. More importantly, with the development of countries' economies and the advent of the knowledge economy, human capital exceeds physical capital in terms of quantity and income, thereby replacing the dominant position once occupied by physical capital (Fukuyama et al., 2018; Van den Berg, 2016). Market scale continues to expand. Specialisation is deepening, and the efficiency of the financial market is also improving. Hence, physical capital becomes easier to copy, whereas the influence of human capital and innovation is becoming more significant (Fukuyama et al., 2018; Holz & Sun, 2018; C. Turner et al., 2013).

Besides each country's own internal development, the flow of talent between countries is a very important factor in the development of national human capital. There are narrow and broad senses of talent flow. The narrow sense of talent flow refers to the flow between organisations, which is usually called "job-hopping". The broad sense of talent flow refers to the flow of talent from one working status to another. The change of working status may be determined by factors such as job position, place of work, nature of occupation, and service target (Holz & Sun, 2018; Le Van et al., 2018). Talent flow is a basic form of talent regulation, and is a key way to adjust the social structure of talents and give full play to their potential. The flow of talent includes the inflow and outflow of personnel. A high-level talent may leave a country and enter another country; from a social perspective, this move represents a talent flow. From a personal

perspective, the person enters a new working environment. From the perspective of the country that absorbs talent, it increases the vitality of the country, improving the human capital of the state; and from the perspective of the original unit of talent, it constitutes a brain drain, lowering the state's human capital (Harpaz, 2015, 2019; Holz & Sun, 2018).

In the contemporary era of globalisation, the flow of talent is a well-known and common trend. However, the flow of talent between countries is uneven. The overall trends are that educated and skilled people tend to flow from developing countries to developed countries, from relatively developed countries to more developed countries, and from socially and politically unstable countries to countries with relatively stable societies and a tolerant political climate (Harpaz, 2015, 2019). Countries want economic growth, especially in the contemporary knowledge economy age in which human capital is gradually surpassing physical capital (Balta & Altan-Olcay, 2016; Harpaz & Mateos, 2018). Dual citizenship policies could attract people to a national economy with sharing their knowledge, skills, and education. Countries wish to attract educated and skilled people to further develop their economy (Chow & Mathien, 2018; SyndiGate Media Inc, 2013). Economically developed countries may be more open to dual citizenship as a way to attract skilled labour, entrepreneurs, and investors. Dual citizenship can make it easier for these valuable individuals to move, work, and invest in the country (Fung, 2004; Iryna, 2020; Siaplay, 2014).

Furthermore, many countries face issues today with their domestic population, such as an ageing population, a low fertility rate, and a low proportion of young labour. In the past quarter of a century, the United Nations has organised three large-scale international population conferences on issues related to population aging and the elderly, and they have played a significant role in issues around the elderly population. For example, the International Conference on Population and Development held in 1974 confirmed that the economic and social impact of population aging is both an opportunity and a challenge for all societies. On July 2, 1999, the twenty-first special session of the UN General Assembly adopted major actions to further implement the Programme of Action of the International Conference on Population and Development (ICPD Programme Action), reiterating that, among other things, all societies must face up to the significant consequences of an aging population in the future (Bloom, Canning and Fink, 2010; Rosset, 2017; UNFPA, 2020).

The increase in the proportion of older adults (over 60 years old) in the population

is accompanied by a decrease in the proportion of young people (under 15 years old). By 2050, the number of older people (over 60 years old) in the world will exceed the number of young people (under 15 years old) for the first time in history (UNFPA, 2020). The ageing population will have significant consequences and effects on many aspects of human life. In the economic field, the ageing population will have an impact on economic growth, savings, investment, and consumption, the labour market, pensions, taxation, and intergenerational transfer (Bloom, Canning and Fink, 2010; Banister, Bloom and Rosenberg, 2012; UNFPA, 2020). Of course, at the social level, population ageing also affects health care and medical care, family composition, living arrangements, housing, and migration. And in politics, the ageing population will affect voting patterns and representation (Prettner, 2013; Rosset, 2017).

In the 21<sup>st</sup> century, the proportion of older adults continues to grow. The ratio of the elderly (people aged 60 and older) was 8% in 1950, 10% in 2000, and is predicted to reach 22% in 2050 (United Nations Population Fund, 2020). Globally, the elderly population grows by 2% every year, much faster than the entire population. It is expected that for at least the next 25 years, the elderly population will continue to grow faster than other age groups. The annual growth rate of people over 60 years old will reach 2.8% between 2025 and 2030 (United Nations Population Fund, 2020). Such rapid growth will require extensive economic and social adjustments in most countries since the increase in the elderly population marks a transition from high fertility and high mortality to low fertility and low mortality (Börsch-Supan, 1991; Rosset, 2017). There is a significant gap between different regions in terms of the number and proportion of the elderly population. In more developed countries, nearly one-fifth of the population was 60 years or older in 2000; it is expected that this proportion will reach one-third by 2050. In less developed countries, only 8% are over 60 years old; however, by 2050, the elderly will account for almost 20% of the population. Considering that the rate of population ageing in developing countries is much faster than in developed countries, developing countries have less time to adjust to the consequences. Furthermore, the ageing of the population in developing countries occurs at a lower socio-economic level than in developed countries (Banister, Bloom and Rosenberg, 2012; Rosset, 2017; UNPFA, 2020).

According to some scholars, countries have dual citizenship policies because they face issues in the domestic population and want to overcome them, including a severely ageing population, low fertility rate, or low proportion of young labour (Harpaz, 2015;

Schierup et al., 2008; Spiro, 2019). According to these scholars, dual citizenship policies, in essence, aim to encourage foreigners and other people (including nationals living abroad) to move to a country (Herzog, 2010; Schierup et al., 2008). Up until 2020, the top ten countries with ageing populations in the world were Japan, Italy, Finland, Portugal, Greece, Germany, Bulgaria, Croatia, France, and Latvia. The percentages of people aged 65 and over in the total population in each of those countries were: 28.2%, 22.8%, 21.9%, 21.8%, 21.8%, 21.4%, 21.3%, 20.4%, 20.3%, and 20.3% respectively (United Nations Population Fund, 2020). Nine of these ten countries have adopted dual citizenship policies.

To sum up, the implementation of dual citizenship rules is positively associated with the desire to improve human capital. The dual citizenship policy serves as a strategic policy tool that has the potential to attract a greater number of individuals to the country. These individuals have the potential to contribute to the country's economic growth as a skilled workforce. Simultaneously, the advent of the era of knowledge economy has been crucial in fostering the country's development by using the knowledge and skills it brings. Furthermore, numerous contemporary countries are now confronting the issue of an ageing population. Implementing a dual citizenship policy can facilitate population movement, so promoting marriage and childbirth rates and ultimately mitigating the problem of ageing. Based on these arguments, this study hypothesises that:

H2: Higher human capital favours having a dual citizenship policy.

#### **4.2 Political Factors**

Political factors include relations with neighbours, country image, regime type and political stability. Relations with neighbouring countries mean whether the country is at peace with its neighbours or whether it is in conflict. A country's image includes its citizens' cognition of the country and the degree of international recognition of the country. The range of regime types fluctuates between autocracy and democracy. In terms of political stability, it can provide a country with a favourable political environment for effective governance and the ability to accept and deal with the many issues caused by dual citizenship.

In this section, the thesis generates four hypotheses: good relations with neighbours favour having a dual citizenship policy. A good country image favours having a dual



citizenship policy. Democracies favour having a dual citizenship policy. And good political stability and governance favour having a dual citizenship policy.

#### 4.2.1 Relations with neighbours

If a country has bad relations with its neighbours, the adoption of a dual citizenship policy by that country will make the neighbours suspicious and worried about that country. The neighbours will be wary of the country that has adopted a dual citizenship policy: whether people from other countries will replace the advantages of natives, affect the country's cultural traditions and purity of blood, or the status of the dominant religion; whether foreigners will replace the dominance of natives in the economy, resulting in the disapproval of natives; and whether other countries have territorial expansion ambitions, using dual citizenship policies as excuses while wanting to invade a country and undermine its sovereignty and territorial integrity, etc. (Herzog, 2010; Scriver et al., 2016). These suspicions, worries, and fears often trigger disputes and conflicts between countries.

For example, at the beginning of the founding of People's Republic of China (PRC) in 1949, the international relations of China were difficult. China faced an economic blockade imposed by the Western capitalist world and associated diplomatic isolation (C. F. Chen, 2010). And since China joined the socialist camp, many Southeast Asian countries feel anxious because they host a large number of overseas Chinese. These Southeast Asian countries worried that China would export revolution, thereby threatening the Southeast Asian regimes who had just got rid of colonial rule (Liang & Liu, 2009; Song, 2008). China's relations with the Southeast Asian countries deteriorated sharply between 1949 and 1980, and there were even serious anti-Chinese incidents in some of the countries. Since Chinese people in Southeast Asia account for a relatively large share of local economies, China's political regime and population numbers in neighbouring countries not only caused suspicions among the governments of the Southeast Asian countries, but also triggered economic jealousy among the local people (Banks, 2015; Fung, 2004). According to Song (2008) and Liang and Liu (2009), China's bad relations with its neighbours at that time led China to be reluctant to adopt dual citizenship policies, and so China's adopted a single citizenship policy is therefore the outcome. The single citizenship policy was also used to eliminate misunderstandings between China and Southeast Asian countries, break the diplomatic blockade of Western capitalist countries, and fight for popular support and resources

with the Kuomintang (political party) in Taiwan (C. Chen, 2010; Song, 2008), but the emergence of a single citizenship policy in China was due to its less-than-ideal relations with its neighbours at first (Dan, 2009; Liang & Liu, 2009).

According to Faist (2004) and Mügge (2012), poor relations with their neighbours often lead countries to oppose dual citizenship policies. In contrast, countries which enjoy good relations with their neighbours are more likely to adopt a dual citizenship policy. Neighbouring countries have more trust and confidence towards the country that has adopted a dual citizenship policy based on good relations (Faist, 2004; Mügge, 2012). In general terms, both sides tend to believe that that opening up a dual citizenship policy may not result in conflict (Faist, 2004; Mügge, 2012). A friendly relationship with neighbouring countries also opens up possibilities for future cooperation with other countries: not only in terms of trade and talent exchanges, but also at international forums and international conferences, where neighbouring countries' statements or votes can lend support for a country's proposal or action (Harpaz, 2019). Such possible or potential cooperation also includes the two countries' reduction of worries and greater confidence in opening up dual citizenship policies. One remarkable example is the European Union (EU) bloc, which consists of 27 member states.

The EU's free movement policy promotes the idea of a shared European identity and encourages social and cultural exchange. This policy is not possible without good relationships among member countries. Trust, cooperation, and shared values among EU member states have enabled them to collectively agree on principles like freedom of movement, which is a core tenet of the EU citizenship policy (Maas, 2007). Many EU member states have dual citizenship policies, such as France, Italy, Malta and so forth (Schierup et al., 2008). The interconnectedness of EU economies necessitates mobility and a shared sense of identity. Good relationships among EU countries fortify this interconnectedness. According to Howard (2005) and Papazoglou (2010), under such good relations with neighbours, EU member states are more willing to adopt a dual citizenship policy since a harmonious political environment allows for economic cooperation, integration, and the elimination of barriers that could restrict the free movement of people.

Moreover, good relationships among EU countries are essential for the enforcement and protection of rights that the EU citizenship provides. In a multi-tiered system of governance like the EU, effective enforcement of rights often depends on cooperation among various levels of government (Harpaz, 2015; J. Shaw, 2007). Thus,

harmonious relationships among EU countries can facilitate more effective enforcement of the rights that come with EU citizenship. Additionally, good relations among EU member states enable the process of continuous negotiation and compromise essential for EU governance and policy-making (Hix & Høyland, 2022; Oosterom-Staples, 2018). The EU's citizenship policy, like many other policies, is the product of this process. It is dynamic and subject to amendments and improvements. Member states' ability to work together and compromise plays a significant role in these developments.

In summary, previous research has suggested that when countries' relations with their neighbours are bad, the adoption of dual citizenship policies are more likely to cause suspicion and worries, like whether people from other countries will replace the population dominance of natives, affect the country's cultural traditions and purity of blood, or the status of the dominant religion; and whether foreigners will replace the dominance of natives in the economy, resulting in the disapproval of natives, and so forth. These suspicions and fears often trigger disputes and conflicts between countries. Countries are therefore reluctant to open up dual citizenship policies. Instead, single citizenship policies run in instances like China, as discussed above. In contrast, when a country has peaceful relations with its neighbours, then each country is more likely to trust the other and believe that opening up its citizenship policy may not result in conflict and may even help both to develop further in the future. Accordingly, countries adopt dual citizenship policies due to their peaceful relations, a mechanism which is best illustrate by the countries in the EU. As such, this thesis expects that:

H3: Peaceful relations with neighbours favour having a dual citizenship policy.

#### 4.2.2 Country image

The concept of "country image" encompasses both a country's self-perception and its perception by other international actors. This dual perspective creates a comprehensive image that evolves through continuous information exchange, shaping what Wang (2003) and Szondi (2010) describe as "information capital with an apparent structure." This study interprets country image as a multidimensional construct reflecting a nation's self-identity and international reputation, encompassing political, economic, cultural, and social dimensions. This study uses the term "country image" to refer to a country's national embodiment (i.e., its image). This term includes a country's perception and

positioning of itself and its appearance or perception on the international stage in the eyes of other countries or international organisations.

In the contemporary era of globalisation, huge economic transactions and large population flows take place between countries. Not only politically but also culturally, there are more exchanges and communication between countries than ever before (Harpaz, 2019; Rubenstein, 2007). Cultural diversity is acknowledged by the world, and human rights have also received close attention in the 21st century. People have freedoms and rights to move, live, and express their opinions as well as to maintain their traditions and customs. Meanwhile, people should respect others' freedom and rights. Such an international atmosphere encourages countries to become more tolerant and open (Seligman et al., 2000; M. P. Vink et al., 2013).

According to Naujoks (2013) and Knott (2019), countries with good national images tend to have a number of national impressions, such as tolerance, openness, respect for human rights, etc. In order to match the country's behaviour with these country images, impressions or “calling cards”, countries with good country images often have dual citizenship policies (Knott, 2019; Naujoks, 2013). To a large extent, having dual citizenship policies is an approach to show countries' openness, inclusiveness, and tolerance (Faist et al., 2004; Knott, 2019; Oosterom-Staples, 2018). A product with a strong brand image can yield significant benefits in the market, including higher prices and increased sales. The country can be likened to a commodity. An advantageous national reputation yields various avenues for growth and advancement in a country's development: for example, the government may gain opportunities for economic cooperation, whether with a cooperative country partner or a business looking to invest there (Naujoks, 2013; Oosterom-Staples, 2018). In the political sphere, internally, a good image gives domestic citizens more confidence in the country and more national pride. Externally, an excellent national image will give the country more prestige and credibility on the international stage, and more supporters in voting and alliances (Szondi, 2010; Wang, 2003). Countries with a good brand image are more concerned about their appearances and are more inclined to do things conducive to upholding their image and its associated benefits – the dual citizenship policy is a strategic policy that serves this purpose (Naujoks, 2013; Oosterom-Staples, 2018).

Australia boasts a strong international image characterised by its economic prosperity, political stability, and multicultural ethos. The nation is celebrated for its

democratic institutions and commitment to the rule of law, ranking high on global indices for governance and corruption perception (Transparency International, 2021). Economically, Australia's resilience during global crises, coupled with its robust mining sector and growing service industry, contributes to its image as a prosperous and stable nation (Organisation for Economic Cooperation and Development (OECD), 2021). Moreover, Australia is renowned for its multicultural society, resulting from successive waves of immigration since World War II. This multicultural character has not only enriched Australian society but has also enhanced its global image, presenting Australia as a diverse and inclusive nation (Markus, 2018). Australia's policy of accepting dual citizenship is due to its multiculturalism and global engagement. The Australian Citizenship Act of 1948 did not allow dual citizenship, but the amendments in 2002 permitted Australian citizens to hold citizenship of other countries. Australia's positive country image and its dual citizenship policy are closely intertwined (Nolan & Rubenstein, 2009; Rubenstein, 2007). The multicultural fabric of the Australian society, one of the key elements of its global image, is reinforced by the dual citizenship policy. By adopting dual citizenship, Australia acknowledges and embraces its cultural diversity, reinforcing its image as a multicultural and inclusive nation (Huddleston, 2020; Jupp, 2007). The shift in policy also reflects the government's recognition of the benefits of dual citizenship for both individuals and the broader Australian society. The dual citizenship policy enhances Australia's global engagement and economic prosperity. Australians overseas can also promote Australia's interests, forming a global network of informal ambassadors who enhance Australia's global standing. (Hugo, 2014).

Moreover, the strategic adoption of dual citizenship policies can be understood through the lens of soft power, where a country's influence extends from its ability to attract and co-opt rather than coerce (Antikowati et al., 2023; Harpaz, 2019). In the context of global politics, countries like France, the United Kingdom, and Canada have leveraged their positive national images, including strong economies, democratic institutions, and cultural heritage, to implement dual citizenship policies, thus enhancing their soft power by projecting an image of inclusiveness and diversity (Harpaz, 2019; Knott, 2019; Rubenstein, 2007). Particularly, EU countries have started to permit dual citizenship for non-EU persons (Brubaker, 2009; Faist, 2004; Schlenker et al., 2017). Canada is another exemplary country in North America that stands out for its good image. According to Herzog (2010; 2014), renowned for its

multicultural society, high standard of living, and strong democratic institutions, Canada has a dual citizenship policy. Seligman, Kymlicka and Norman (2000) add that this not only helps to attract skilled immigrants, which boosts the economy, but also helps Canadians living abroad to maintain a connection with their home country. Bloemraad (2006), and Aptekar (2014) have also suggested that the dual citizenship policy, as a strategy, reinforces Canada's image as a welcoming and inclusive country.

To sum up, there is an image projection. Countries with positive national images, characterised by attributes such as economic prosperity, political stability, respect for human rights, and cultural diversity, use dual citizenship policies as tools to project these qualities internationally, enhancing their attractiveness and global influence. This, in turn, brings countries internal and external benefits. Regarding the internal benefits, a good national image promotes domestic cohesion and pride. Dual citizenship policies reinforce this by acknowledging the multicultural identity of the nation and fostering a sense of inclusion and belonging among its citizens, including those living abroad. Concerning external benefits, internationally, such policies facilitate economic, cultural, and diplomatic engagements by allowing individuals to operate in multiple national contexts, thus extending the country's reach and influence. This multiplicity of connections serves to reinforce the country's image as open and globally integrated. Meanwhile, dual citizenship policies are part of a broader soft power strategy, helping to attract skilled immigrants, investors, and international goodwill without resorting to coercive means. These policies contribute to building a positive international reputation, which can be leveraged in global diplomacy and international relations. Instances like Australia, Canada, and EU countries, which have harnessed their positive images to implement dual citizenship policies, demonstrate how these policies can be integral to a country's strategic image management and its international relations strategy.

Therefore, countries with positive national images are more likely to implement and maintain dual citizenship policies as a strategy to enhance and project their image of tolerance, openness, and multiculturalism, which in turn contributes to their soft power and global standing. Based on these arguments, this thesis hypothesises that:

H4: A good country image favours having a dual citizenship policy.

#### 4.2.3 Regime type

The relationship between regime type and citizenship policy, particularly regarding

dual citizenship, is a nuanced and multifaceted subject. This section critically examines the scholarly discourse on how different regime types—democratic versus authoritarian—approach the concept of dual citizenship, focusing on the dimensions of individual rights, global mobility, governance style, and national loyalty.

Democracies are commonly distinguished by their advocacy for individual liberties and entitlements, which also include the domain of citizenship policy. Researchers like Spiro (2016) argue that democratic regimes tend to support dual citizenship as a manifestation of liberal values, including tolerance for diversity and individual choice (Spiro, 2016). This is seen as part of a broader trend towards transnationalism, reflecting the increased global mobility and interconnectedness of individuals (Bloemraad, 2004). The argument is that democracies, with their open-market economies and emphasis on human rights, view dual citizenship as beneficial for fostering global networks and economic development (Joppke, 2010). In contrast, authoritarian regimes often perceive dual citizenship as a potential threat to state control and national loyalty. Scholars like Huang (2016) highlight that these regimes fear dual citizenship could lead to divided loyalties among citizens, undermining the state's authority and cohesion (Huang, 2016). Authoritarian leaders might also be wary of the external political and cultural influences that dual citizenship represents, leading to stricter citizenship policies designed to maintain control over the population (Shachar, 2009).

The governance style and the level of openness of a regime also significantly impact its citizenship policy. For example, democratic regimes with higher levels of transparency and accountability are more likely to implement policies that facilitate dual citizenship, aligning with broader human rights protections (Faist, 2000b). On the other hand, authoritarian regimes, characterised by opacity and centralised control, often impose restrictive policies to monitor and control their citizens' affiliations and movements (Gibney, 2013).

Regarding the factor of regime type, there is a subtle situation worth discussing, which is political ideology. Although it was said before that democratic regimes emphasise individual rights and global citizenship, might be more inclined to allow dual citizenship, but at the same time, many countries with democratic regimes implement multi-party system or two-party system (Mainwaring, 1993). Then it will inevitably involve different political ideologies supported by different parties. When Parties with nationalist or right-wing ideologies come to power, they might perceive

dual citizenship as a threat to national identity and sovereignty, preferring stringent single citizenship policies. Conversely, when parties with more liberal or left-leaning ideologies come to power, they may support dual citizenship as an expression of open borders and global citizenship (Howard, 2009).

This thesis studies the factors associated with citizenship policy in the long term, so it focuses more on the relationship between regime type and dual citizenship policy. A country's regime type will not change much in the long run. However, general elections in the short run will have an impact on the party that comes to power. The political ideology of the party that comes to power, in turn, will affect the fluctuation of citizenship policies: more tolerant or stricter. In the subsequent case analysis, some causal relationships can be observed through in-depth case studies, such as the political ideology of the ruling party at the time when the country changed its citizenship policy or adopted a dual citizenship policy. This can provide a more vivid elucidation to our discourse on the correlation between regime type and dual citizenship policy.

To sum up, the nature of a regime, whether democratic or authoritarian, has a substantial impact on its policy on dual citizenship. Democracies are more inclined to allow and promote dual citizenship, whereas authoritarian regimes tend to limit or forbid it. The mechanism relies on the value systems and governance priorities of various sorts of regimes. Democracies perceive dual citizenship as a manifestation of personal liberty and a means to promote international involvement, in line with their dedication to human rights and free trade. This prompts them to facilitate and promote numerous national affiliations. Authoritarian regimes prioritise state control and national cohesion, as they are concerned that dual citizenship may weaken loyalty and bring foreign influences. As a result, they implement stringent policies on dual citizens in order to uphold their control and prevent any possible internal opposition. Based on these arguments, this thesis hypothesises that:

H5: Democracies favour having a dual citizenship policy.

#### 4.2.4 Political stability and governance

Dual citizenship policies are a marker of a state's confidence in its ability to manage the diverse allegiances of its population (J. Blatter, 2011). This confidence is deeply rooted in the nation's political stability, ensuring that the state can maintain order and uphold the rule of law amid challenges arising from citizens holding allegiance to more than



one country (J. Blatter, 2011; Jasinskaja-Lahti et al., 2020). Effective governance also plays a crucial role, denoting the state's capacity to implement and manage complex policies, like dual citizenship, and to negotiate the international treaties often underpinning these policies (Bloemraad et al., 2008).

The difficulties of dual citizenship are numerous, with legal, social, and political implications. Legally, states must address issues like passport issuance, consular protection, and the judicial rights of dual citizens (Adzhba, 2016). Socially, the integration of dual citizens into the fabric of society, while respecting their multicultural identities, is a significant task (Faist, 2012; B. S. Turner, 1990). The political problem is to strike a balance between national interests and dual citizens' global rights and duties (Vera-Larrucea, 2012).

One of the critical concerns regarding dual citizenship is the potential risk to national cohesion. The fear is that individuals with loyalties to more than one country may undermine the unity and solidarity of the state (Howard, 2005). As the concept of citizenship evolves to reflect global changes, states must navigate the complexities that come with individuals holding allegiances to more than one nation. This situation calls for robust political structures capable of handling the multifaceted nature of dual citizenship without compromising national cohesion. Political stability can mitigate these concerns by fostering a sense of inclusion and belonging for dual citizens. A politically stable state is better equipped to integrate dual citizens into its national narrative, recognizing and valuing the diversity they bring to the nation (Pogonyi, 2011). This integration helps to strengthen national cohesion, as it is grounded in mutual respect and understanding, rather than suspicion or exclusion (Howard, 2005).

Staeheli (2011) argues, the evolving nature of citizenship in the context of global changes requires states to be adaptable and responsive. Political stability is the bedrock upon which effective dual citizenship policies can be built and managed, ensuring that the benefits of such policies are realised without compromising national cohesion. Stable governance structures can implement clear and fair dual citizenship policies, mediate between conflicting national laws, and ensure the equitable treatment of all citizens, regardless of their dual status (Staeheli, 2011).

Furthermore, the work of Bloemraad, Korteweg, & Yurdakul (2008) underscores that the ability of a state to manage the intricacies of dual citizenship reflects its broader governance capacity. It involves a holistic approach that considers legal frameworks, social integration, administrative efficiency, and international diplomacy. Effective

governance entails not only the creation of dual citizenship policies but also their consistent and fair implementation. This entails developing clear and accessible legal paths for persons to gain dual citizenship, providing enough resources for administrative processes, and ensuring that dual citizens' rights are preserved and maintained (M. P. Vink & De Groot, 2010). Management of dual citizenship also involves ongoing monitoring and evaluation to respond to emerging challenges and to adapt policies to changing international and domestic landscapes (Spiro, 2010).

The legal implications of dual citizenship are complex and diverse. They include national security challenges in which dual citizens may be thought to have conflicting loyalties, particularly during times of international crisis. The legal system must address how to reconcile these potential conflicts, determining how rights and responsibilities, such as military service, voting, and access to public office, are managed for dual citizens (Howard, 2009). Moreover, dual citizenship raises social implications, particularly concerning national identity and social integration. States with effective governance must ensure that policies around dual citizenship foster social cohesion, enabling dual citizens to integrate into the societal fabric without diluting their sense of belonging or creating divides between single and dual nationals (Spiro, 2010; M. P. Vink & De Groot, 2010).

Dual citizenship inherently involves more than one nation, making international treaties and relations crucial in its governance. States must negotiate treaties that recognise and protect the dual citizenship status, addressing issues such as extradition, taxation, and consular protection (Adzhba, 2016; Bloemraad et al., 2008). Effective governance in this area requires diplomatic skill and a deep understanding of international law and relations (Esty, 2005; Rubenstein, 2007).

To sum up, a stable political environment allows for the balanced integration of dual citizens, supporting both their rights and the cohesive unity of the state. Effective governance in relation to dual citizenship policies refers to a state's ability to create, implement, and manage this legislation in a way that balances dual citizens' rights and obligations while upholding the country's legal and social order. This entails a comprehensive strategy that tackles both the internal intricacies of the country and its global interactions. The underlying assumption is that political stability provides a conducive environment for the implementation of nuanced policies, while effective governance ensures that these policies are well-managed and responsive to the complexities of dual citizenship, balancing individual, and national interests. In short,

this thesis hypothesises that:

H6: Good political stability and governance favour having a dual citizenship policy.

### **4.3 Cultural Factors**

The cultural factors examined here refer to the historical and traditional perceptions of a country. The cultural reasons in this thesis include levels of immigration and levels of emigration, and whether the country has a colonisation history or experiences. The immigration level refers to the number of net immigrants arriving into a country, while the emigration level refers to the number of net leavers departing from a country. For instance, in 2015, according to the United Nations, the United States had the highest number of immigrants (foreign-born individuals), with 48 million, five times more than Saudi Arabia (11 million) and six times more than Canada (7.6 million) (UN Population Division Department of Economic and Social Affairs, 2019). And for emigration, taking EU countries as an example, the highest rates in 2018 were reported for Luxembourg (23 emigrants per 1,000 persons), Malta (19 emigrants per 1,000 persons), Cyprus (18 emigrants per 1,000 persons), and Romania (12 emigrants per 1,000 persons) (Eurostat, 2020). Having had a colonisation history refers to whether a country has been colonised in its history, or has colonised other countries, or has had both experiences. In the 15th to the 17th centuries, Spain and Portugal were two well-known colonial empires, and then from the 17th to the middle of the 18th centuries, Britain, France and the Netherlands were colonial powers. At that time, India, Canada, North America, and several other regions were reduced to colonies (Majumdar, 2013; Rothhammer & Dillehay, 2009).

#### **4.3.1 Migration rate**

In countries with a large number of immigrants, immigrants usually contribute a lot to the countries. They even formed the country or developed and strengthened it later (Escobar, 2007; Pehrson & Green, 2010). Nonetheless, disputes about immigration have become more and more severe in recent years, especially in the United States, where the Trump government's series of immigration policies have brought about substantial social disputes. In Europe, whether it is refugees from Syria or immigrants from Turkey, the topic of immigration has also triggered huge controversies in many countries (Favell, 2008; Kang, 2012). Even in China, a non-traditional immigrant

destination, claims of "bad behaviour of Guangdong Blacks" are often seen online (Banks, 2015). To a large extent, we cannot deny the benefits of immigration to a country, as the benefits outweigh the disadvantages, as many scholars have argued.

Immigrants themselves will not cause any severe social and economic problems. On the contrary, they can bring many economic, demographic and educational benefits (Kaushal, 2019). Immigrants can supplement the receiving country with many young labourers, which is particularly important for countries facing ageing population problems. Statistics show that the United States, Japan, and Europe basically had the same birth rate in the early 1970s. However, the birth rate in Europe and Japan has continued to fall in the past four decades, and both have now fallen below the warning line (Banks, 2015; Kaushal, 2019; Spies, 2018). The problems of population ageing, and labour shortages are becoming increasingly severe. On the other hand, the United States has maintained a relatively healthy birth rate and growth rate by absorbing a large number of immigrants (Abrajano & Hajnal, 2015; Foner, 2005). The alleviation of population ageing has undoubtedly played an essential role in American society's sustained economic growth. In fact, in the 15 years from 1995 to 2010, half of the American labour force's growth came from immigrants (Spies, 2018). There is therefore no doubt that immigrants have contributed a lot to the sustained growth of the US economy.

If immigrants contribute a lot via their labour, it is difficult to see how they take away local workers' jobs. This dilemma can lead to different discussions, but the key point is that immigrants have different impacts on different groups (Schierup et al., 2008; Spies, 2018). Immigrants will certainly increase competition for employment and harm labourers' interests among those local workers with highly overlapping skills with the immigrants. However, if immigrants' skills are a useful supplement to the domestic labour market, immigrants will not affect the employment of local workers but will create more economic value (Foner, 2005; Kaushal, 2019). For example, the United States has a long-term lack of mathematics teachers in primary and secondary schools, which has had a significant negative impact on American students' mathematics education and indirectly affected the overall level of American education. The introduction of large numbers of immigrants with mathematical skills is therefore of great benefit to the United States. At the same time, most economic studies have found that immigrants' impact on the job market will only last for a few years, and that the market can often automatically adjust to absorb these effects. From a macro perspective,

the impact of immigration on local employment and income is not so significant as has been commonly suggested. Instead, immigration has a very positive impact on a country's economy and education (Banks, 2015; Kaushal, 2019).

Besides, many accusations regarding immigrants include concerns about them taking local welfare resources. After all, if immigrants have not made tax contributions to the country before, and enjoy welfare resources for no reason, this may indeed appear unfair and a burden to the social security system. However, economic data has once again shown the opposite to be true. A study in the United Kingdom showed that between 1995 and 2011, immigrants' overall contribution to the taxation and social welfare of the United Kingdom was greater than that of native British people. In other words, immigrants are an asset to British society, not a burden (Crutchfield & Pettinicchio, 2009; Schierup et al., 2008). Research involving other OECD member countries has also shown that immigrants are not a burden on their finances. In the past 50 years, the impact of immigrants on host country's finances has not been significant, usually not exceeding 0.5% of the country's GDP (Alarian et al., 2017). In other words, although citizens in rich countries are generally worried that low-educated immigrants will hinder their country's social security and finances systems, the real economic data does not support this worry.

The anti-immigration tendency in many countries has not arisen because of the apparent losses that immigrants themselves have caused to the local area, but more because local people emotionally shun people who are different (Abrajano & Hajnal, 2015; Miller, 2016). Therefore, a lack of a societal mechanism that accepts and absorbs immigrants has resulted. Immigrants do not bring serious negative consequences, despite what many people imagine. More importantly, many of the so-called adverse effects are not caused by "foreign immigrants" but are more the product of social inequality and domestic educational issues (Kaushal, 2019; Spies, 2018). As discussed above, large numbers of immigrants and immigration benefits, including economic, population, education, etc., greatly support a country. A number of scholars generate that countries with high immigration levels tend to adopt dual citizenship policies because they want to retain these large numbers of immigrants and gain the benefits they bring (Bevelander & Pendakur, 2012; Bloemraad et al., 2008; Stadlmair, 2017; Veronis, 2013). Blatter, Erdmann and Schwanke (2009), Whitaker (2011), Iheduru (2011), Manby (2016b), and Schlenker, Blatter and Birka (2017) similarly suggest that countries with high emigration rates tend to allow a dual citizenship policy because

they want to attract foreigners to their country, and natives living overseas for a long time to return. They can increase the number of citizens in the country, overcome population ageing and lack of youth labour problems, improve the country's economic development, raise the level of national education, and even create a better society (Iheduru, 2011; Schlenker et al., 2017; Whitaker, 2011).

It has been argued that adopting a dual citizenship policy becomes a common measure for countries with high levels of immigration or emigration. Most of these countries have a comprehensive set of migration laws, regulations, and policies to help different types of immigrants, including their screening and management (Escobar, 2007). Also, because immigrants are a vital part of these migration countries, if they easily leave, this hinders the development of the country. Therefore, not all countries with high immigration or emigration rates adopted dual citizenship policies very early in their history or at the beginning (Kennedy et al., 2008; Mann, 2019). In some cases, a dual citizenship policy is only adopted after a referendum or is acknowledged by default, such as in Australia and the US.

Australia is a typical “country of immigrants”, which has high levels of immigration. It is sometimes described by sociologists as a “national platter”, consisting of groups from many nations. Since the first days when British colonists and immigrants set foot there, immigrants from 120 countries and 140 ethnic groups have come to Australia to earn a living and develop including, for instance, Germany, Greece, and Italy in Europe, and various Asian countries and regions such as Japan, China, and Vietnam. These populations are mainly distributed in the southeast coastal area (Mirilovic, 2015). Australia banned dual citizenship in section 17 of the 1948 Citizenship Act, but after the lobbying of various interest groups, this clause was repealed in 2002 and a dual citizenship policy was implemented (Glover, 2017).

The US has a large number of immigrants, yet the country has a policy of implicit recognition<sup>7</sup> of dual citizenship, as there is no explicit provision to recognise dual citizenship in the United States’ policies and legal provisions on citizenship. The recognition of dual citizenship in the United States has gradually formed with the development of society and through court precedents (J. Blatter et al., 2009). For naturalised immigrants who have acquired US citizenship, the United

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<sup>7</sup> For what “implicit recognition” of dual citizenship policy means, please see Chapter Two, section 2.2 for details.

States Immigration and Citizenship Act explicitly stipulates that the applicant must take an oath of allegiance to the United States and renounce their original citizenship. They do not need to present proof; however, in practice, the oath may not be recognised by the renunciation country of citizenship, and applicants could involuntarily still possess their original citizenship (Schlenker et al., 2017). The applicant also can possess their original citizenship voluntarily and unknown to the US government. Since obtaining citizenship approval is a matter falling within the authority of USCIS (the United States Citizenship and Immigration Services), and after joining American citizenship, the affairs of US citizens are administered by the US Department of State (Balta & Altan-Olcay, 2016; Pogonyi, 2019), there is a gap in the administration. Because the mobility and immigration rate of the US population is high, the State Department rarely monitors and interferes with naturalised individuals. In practice, dual citizenship has become common in the US, and the oath of renunciation of original citizenship occurs as a form (Balta & Altan-Olcay, 2016).

All these arguments help to formulate two separate hypotheses for the present thesis. On the one hand, in countries with high levels of immigration, immigrants play an important role in countries' population, labour forces, intellectual productivity and so forth. However, immigrants have a high degree of mobility. They can come to the country but are also able to leave the country. Countries want to retain these immigrants and make them a permanent part of their population (to gain the benefits they bring, as discussed above). According to these arguments, this thesis would expect that:

H7: High levels of immigration favour having a dual citizenship policy.

On the other hand, in countries with large shares of emigrants, their nationals and specialists leave the country. In order to attract foreigners that can take the place of those people, countries may decide to encourage a dual citizenship policy (Chow & Mathien, 2018; Tintori & Romei, 2017). The phenomenon of "brain drain" refers to the emigration of highly skilled or well-educated individuals from a particular country to another, often in search of better opportunities, higher wages, or improved living conditions. Brain drain can have significant negative impacts on a country's economy, social structure, and development prospects (Tintori & Romei, 2017). One way that countries attempt to mitigate the effects of brain drain is by implementing or encouraging dual citizenship policies (Mayr & Peri, 2008; Thaut, 2009).

Dual citizenship allows emigrants to maintain a formal relationship with their home country, which may encourage a sense of loyalty or emotional connection. Dual citizenship policy usually allows for easier travel between the two countries. This could encourage skilled emigrants to return, either temporarily or permanently, to their home country for work or investment opportunities (Humphries, N., Connell, J., Negin, 2019; Mayr & Peri, 2008). Chow and Mathien (2018) suggest rather than a permanent loss of skilled workers, dual citizenship can encourage a more circular form of migration where individuals move temporarily and return with gained skills and experiences. Dual citizenship policies can provide employers with a larger pool of potential employees who are already authorised to work in the country, which can be particularly beneficial for sectors that require highly specialised skills, helping to address the problem of brain drain with high emigration rates (Chow & Mathien, 2018; Mayr & Peri, 2008; Thaut, 2009; Tintori & Romei, 2017). In addition, countries also want the benefits that these foreigners bring, just as the countries with dual citizenship policies discussed earlier are the ones that see the benefits of high levels of immigration. As a result, countries with high levels of emigration adopt dual citizenship policies because they want to attract foreigners who can substitute for the people who have left the country, and to attract nationals living abroad to come back home. Based on these arguments, this study hypothesises that:

H8: High levels of emigration favour having a dual citizenship policy.

#### 4.3.2 Colonisation experience (history)

Having had a colonisation history refers to whether a country has a colonisation experience in history, including colonising other countries, being colonised by another country, or having both experiences. According to Koebner (2017), Paynter (2017), and Fiore (2018), the colonisation experience of a country is another cultural factor that influences the adoption of a dual citizenship policy. Countries that were colonised previously or were colonial countries (suzerain states) or had both experiences in history could be more likely to adopt dual citizenship policies. During colonisation times, many people from colonised countries immigrated to the suzerain states to serve as local labour (Fiore, 2018; Koebner, 2017; Paynter, 2017). Many colonial suzerain citizens migrated to the colonies, to do management jobs and other senior work. They settled there for higher salaries and to gain a higher social class (Paynter, 2017; Sai,



2019). After the wave of colonial independence during the 1950-1980s, numerous colonies became independent of the former colonial suzerain and established themselves as independent countries. Colonial countries wanted to keep the cheap labour who previously came from their colonies and to keep in touch with the senior managers who were still living in the former colonies. Therefore, those previous colonial countries could maintain access to sufficient labour, even at a much cheaper cost. Dahlin and Hironaka (2008) also pointed out that continuing links with former nationals in ex-colonies could be a means of continuing to exert an influence on “independent colonies” and to potentially control them. According to Bertilsson et al (2006), Whitaker (2011), and Manby (2016a), previous suzerain countries could also continue to access and obtain resources, and probably votes from those previous colonies in the future. A dual citizenship policy is an effective approach to achieve these things.

As one of the countries that had the most colonies, after the Second World War, the United Kingdom decided that people from its colonies and British people who had stayed in the ex-colonies both had the right to British citizenship. The United Kingdom accordingly was able to access labour from the former colonies and to maintain contact with British citizens still living in now-independent colonies (Kiwani, 2005). France published a new French Citizenship Law in 1986, adopting *jus sanguinis* and stipulating that no matter how French people received foreign citizenship, they could keep their French citizenship. Potentially, France still influences its former colonies even though they are now independent countries, although the dual citizenship policies of both the UK and France were also grounded in the common agreements of the European Union, such as the European Convention on Nationality 1997 (Schierup et al., 2008; Schlenker et al., 2017).

Spain has implemented a policy of encouraging dual citizenship for a long time, and has signed agreements with Latin American countries on the mutual recognition of dual citizenship. In the late 1950s, Spain and Chile (May 24, 1958), Peru (May 16, 1959), and Paraguay (June 25, 1959) signed bilateral agreements on the mutual recognition of dual citizenship. In the 1960s, Spain and Bolivia (1961), Guatemala (1961), Nicaragua (1961), Costa Rica (1964), Ecuador (1964), Honduras (1966), the Dominican Republic (1968), Argentina (1969) and Colombia (1979) signed similar agreements. These countries were former Spanish colonies, and many Spaniards had lived in them for a long time (Harpaz, 2019; Yanasmayan, 2015). The official language

of all these countries is Spanish. Therefore, this dual citizenship policy greatly benefits the countries and residents involved. It is worth mentioning that Spain adopted a new constitution on December 29, 1978, Article 10 (3) Chapter 1 of which reaffirms the policy of recognising dual citizenship and provides convenience for citizens of Spain and Latin American countries (Howard, 2005; Yanasmayan, 2015).

Some post-independence former colonies also needed the help of the former colonial sovereign, and a dual citizenship policy helps to achieve that. An example is the Democratic Republic of Congo (DR Congo). Like many African countries, the Democratic Republic of Congo has needed resources to economically develop after independence, including material capital, human capital, and technological innovation. Foreign nationals with dual citizenship are the first choice (Bertocchi & Strozzi, 2010). Hong Kong and Macau after independence had similar motivations, and their people are allowed to have British and Portuguese passports respectively (G. Ho & Bairner, 2013). Besides, some post-independence colonial countries have good social and physical foundations, so establishing a dual citizenship policy with the previous colonial sovereign country could be a win-win situation in which the two sides learn from each other. The colonial sovereign country can obtain certain physical resources and votes from the independent colonial country, while the ex-colonial countries after independence can also continue to learn technology, governance, and management methods from the developed colonial sovereign countries (Bertocchi & Strozzi, 2010; Scriver et al., 2016). Examples include Canada where, following the British Nationality Act in 1948 which provided British citizenship to the United Kingdom and previous colonial citizens, Canada promulgated the Canadian Nationality Act in 1977, stating that Canadian citizens would not lose their Canadian citizenship after acquiring other citizenships (Prabhat, 2018; Schierup et al., 2008).

Countries with a colonisation history are more likely to adopt dual citizenship policies. When they have either just gained independence or withdrawn power from former colonies, countries on both sides of colonialism suffer from a certain degree of labour loss, and reduced resources. Former colonial countries want to retain the labour force they had in their colonies and to keep contact with natives overseas, to maintain their competitiveness (Fiore, 2018; Koebner, 2017; Paynter, 2017; Sai, 2019). Former colonies, as newly independent countries, want to learn technology, management, and various aspects from developed countries, and to strengthen themselves (Bertocchi & Strozzi, 2010; G. Ho & Bairner, 2013; Scriver et al., 2016).

Dual citizenship policies may encourage people from colonies (who are currently living in colonial countries) to gain dual or multiple citizenships, as it is often convenient for them to keep working in colonial countries, and also easy for them to go back home to visit their ex-colony home state (Fiore, 2018; Koebner, 2017; Paynter, 2017). Dual citizenship policies also encourage natives overseas (whether of colonial or colonised countries) to go back to their home countries, benefitting their home countries' population, investments, and various other economic aspects, strengthening their country or maintaining its overall competitiveness (Paynter, 2017; Sai, 2019). Overall, countries with a colonisation history are more likely to adopt dual citizenship policies, in line with historical institutionalism. Based on these arguments, consequently, this thesis expects that:

H9: Colonisation experience (including colonising other countries and being colonised by other countries) favours having a dual citizenship policy.

#### **4.4 Control Variables**

In addition to physical capital, human capital, relations with neighbours, country image, regime type, political stability and governance, immigration levels, emigration levels and colonisation experience, which are generated from the previous literature (theory) and used in this thesis to generate hypotheses, there are also five control variables: contagion effect, size of (a country's) territory, religious diversity, ratification of international human rights treaties and multiparty system. Control variables are included in analyses to account for factors that may influence the relationship between the independent and dependent variables (Box-Steffensmeier et al., 2008) – in this thesis it is the relationship between the factors in the hypotheses and the type of citizenship policy (single or dual), but are not of primary interest in the study. By controlling for these variables, this thesis aims to isolate the effect of the independent variable on the dependent variable, making the results more accurate and generalisable (Becker, 2005; D. Ho et al., 2007). Control variables can also be used to test the robustness of the results. If the main findings of the study still hold when control variables are added, this strengthens the validity of the conclusions, as the regression in the following Chapter 6 has done (Thrane, 2022).

The contagion effect in policy adoption can be analysed through the lenses of diffusion theory and regionalism in international relations. Theoretical frameworks

such as policy diffusion models (Berry & Berry, 2018) or the concept of "soft power" in geopolitical strategy (Nye, 2004) might provide robust foundations for understanding how and why dual citizenship policies spread across regions or among culturally or politically similar countries. Countries often look to peers that they perceive as successful or similar. When these peer countries adopt dual citizenship and seemingly benefit from it—whether through enhanced diaspora relations, increased foreign direct investment, or improved international reputation—neighbouring or culturally connected countries may emulate these policies. This form of policy learning is particularly prevalent in regions with shared historical ties or common political and economic challenges. In areas with strong regional integration, such as the European Union, there is also a tendency towards harmonising policies to facilitate movement, employment, and residency rights across borders. By enabling citizens to keep connections to their home country while actively engaging in the social and economic life of the newly arrived country, dual citizenship policy serves as a tool to promote integration. Geopolitically, countries surrounded by other countries that have adopted dual citizenship may consider introducing a similar policy to maintain their competitive advantage. This is particularly relevant for countries competing for skilled migrants, global talent, and the diaspora's investment and loyalty. Having a dual citizenship policy can be seen as a response to regional competitive pressures.

The size of a country's territory can influence its adoption of a dual citizenship policy in a number of ways, although it's important to note that this is only one of many factors that can influence such a policy. Larger countries often have a more diverse population. Dual citizenship could be a way of recognising and embracing this diversity. In smaller countries, there may be a stronger sense of national identity and a greater concern that dual citizenship could dilute this. Larger countries may feel less threatened in this regard (Knott, 2019). Larger countries may also have a more diverse labour market and a greater need for specialised skills (Faist, 2012). Dual citizenship may make it easier to attract and retain people with these skills. A country with a large territory may therefore have a dual citizenship policy.

The control variable of religious diversity refers to the variety of religious beliefs, practices, and traditions that exist within a particular country. In the country with high religious diversity, we'll find a wide array of religious beliefs, practices, and affiliations. Several different religions are represented in significant numbers. Cultural interpretations of the same religious practices could be evident. Atheism, agnosticism,

and secular humanism may also be present and accepted. Emerging or less mainstream religious movements may also have a presence (Montero, 2018; The Pew Research Center, 2014). High religious diversity is often associated with pluralistic societies that emphasise freedom of religion and belief. It can also be a feature of cosmopolitan cities where people from various backgrounds come to live and work (Olson et al., 2020). In countries with high religious diversity, dual citizenship could be seen as a way to foster social cohesion and integration. By allowing individuals to maintain ties to their country of origin, dual citizenship can help to alleviate feelings of exclusion or marginalization among minority religious groups. So, this thesis considers that countries with high religious diversity may adopt a dual citizenship policy.

The control of the ratification of International Human Rights (IHR) Treaties suggests a country's consent to be bound by a human rights treaty under international law, among 18 International Human Rights Treaties (OHCHR, 2020). It primarily reflects a country's respect for human rights and its willingness to uphold them. The freedom of movement of persons, the freedom to choose one or more places of residence and the freedom to acquire one or more citizenships should be rights of persons (Spiro, 2010). Thus, this thesis expects that a country that agrees to many international human rights treaties will usually be very respectful of human rights, and such a country will be more inclined to adopt dual citizenship policies.

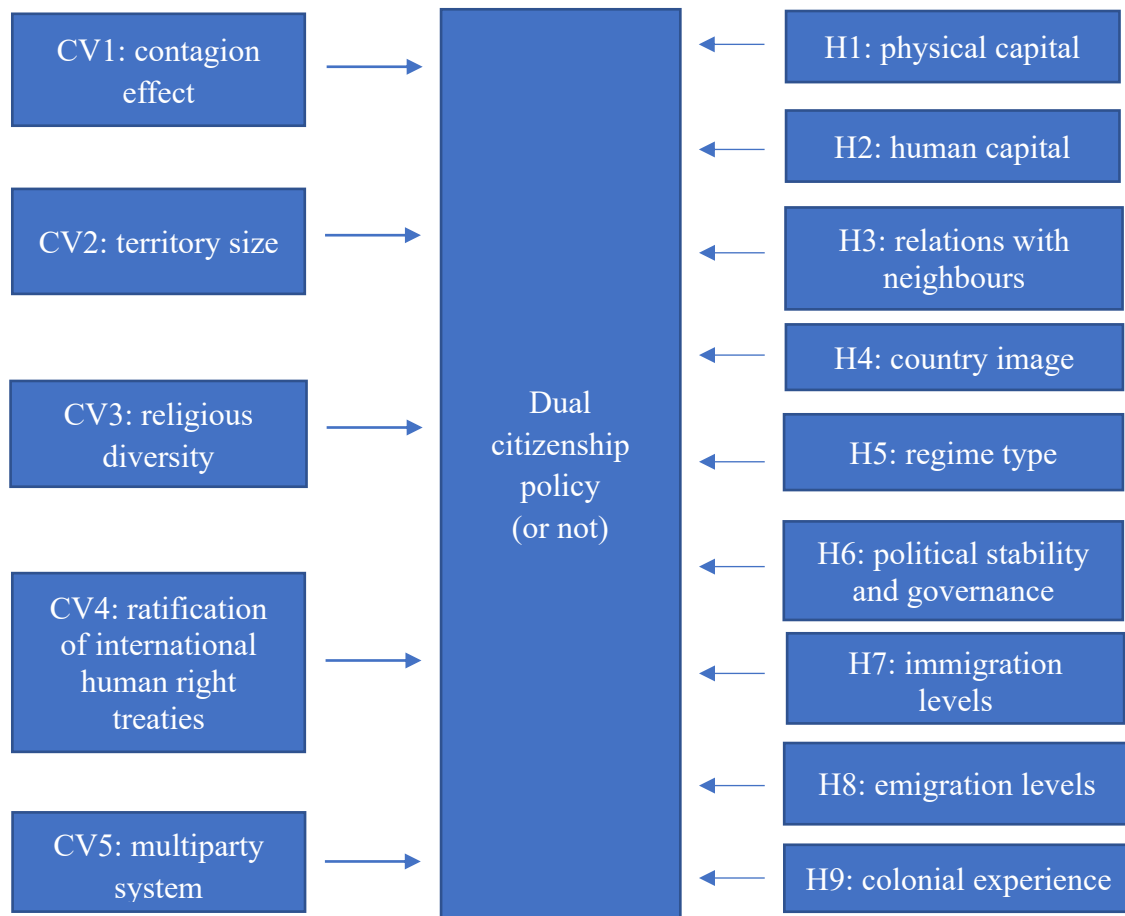
The final control variable, the presence of a multiparty system, indicates whether a country has a multiparty system or a single-party system. In this study, a multiparty system includes a system with two or more parties. The influence of a multiparty system on a country's adoption of a dual citizenship policy may vary depending on a number of factors, including political culture, historical context and the specific policy objectives of the parties involved. However, there are some general ways in which a multiparty system can influence such dual citizenship policies. A multiparty system often represents a wider range of opinions and interests, which may make it more likely that niche issues such as dual citizenship will receive attention (J. Blatter et al., 2009; Papazoglou, 2010). Multiple parties may mean a greater diversity of ideas, potentially leading to more innovative and tolerant solutions to complex issues such as citizenship (Mirilovic, 2015). However, the impact of multiparty systems on dual citizenship policy can also be unfavourable, for example if different parties focus on different aspects: parties with a focus on human rights or internationalism may support dual citizenship in principle, arguing for the right to multiple identities or facilitating global mobility;

on the other hand, nationalist or right-wing parties may oppose dual citizenship on the grounds that it dilutes national identity or poses security risks. As previously stated in the discussion on "regime type," the rise of several political parties will result in the emergence of distinct political ideologies, which in turn will impact a country's adaptation to dual citizenship. In addition, if the views of different parties are not harmonised, this could slow down the legislative process and make it more difficult to pass comprehensive reforms in the multiparty system, such as reforming the policy from single to dual citizenship. There is limited literature explicitly addressing the correlation between multiparty systems and dual citizenship policy. Therefore, this thesis includes multiparty system as a control variable to enhance the accuracy of the analysis.

### **Conclusion**

This chapter has looked at several factors that could impact whether or not a country has a dual citizenship policy: physical capital, human capital, relations with neighbours, country image, regime type, political stability and governance, immigration levels, emigration levels, and colonisation experience (history). These have been divided into three groups: economic, political, and cultural, according to their function and purpose in the question of dual citizenship policy. Each factor builds a hypothesis. There are nine hypotheses in the thesis. Together with five control variables, nine factors in nine hypotheses form the analytical framework of this thesis, as Figure 4.1 shows.

**Figure 4.1: Analytical Framework**



Creating an analytical framework for this study on factors associated with the single or dual citizenship policy is important. An analytical framework provides a clear structure for the research process. It organises complex ideas and factors into a systematic format, making it easier to understand the interplay between different components. It helps to narrow down the study's focus to specific hypotheses and factors, enabling more accurate and detailed analysis. Besides, by using an analytical framework based on existing literature, this thesis is building upon established knowledge. This gives this study a stronger foundation and makes the conclusions more robust. It also provides a way to test the validity of previous findings in the context of new data. For the data collection, with a structured framework, it's easier to determine what kind of data is needed, how to collect it, and which methods are most suitable for analysis. This can enhance the efficiency of this study.

For broader communication, presenting my findings becomes more straightforward when there's a structured framework. My audience, whether they're

academic peers, policymakers, or the general public, can follow my logic, understand my methodology, and appreciate the significance of my conclusions. My framework can also serve as a starting point for future studies. Researchers might expand on it, add new factors, or use it to explore related questions in the realm of citizenship policies. In essence, an analytical framework enhances the rigour, clarity, and impact of my research. It provides a systematic approach to exploring a complex issue, allowing for more meaningful insights and conclusions.



## **CHAPTER 5**

### **METHODOLOGY**

The methodological framework of this research is structured to comprehensively analyse the factors associated with a country's citizenship policy type. This methodology utilises both quantitative and qualitative tools to ensure a comprehensive examination and nuanced comprehension of the factors that influence dual citizenship regulations. Section 5.1 explains the time frame and sample in this thesis. Sections 5.2 and 5.3 explain in turn the main quantitative and qualitative analyses used in this thesis, including the quantitative techniques used and a detailed explanation of the comparative case study and the single case study in Italy in the qualitative analysis.

#### **5.1 Time Frame and Sample**

The studied time frame in this thesis is from 1945 to 2019. Starting point has been selected since, especially with the UN's Universal Declaration of Human Rights, citizenship started to become a topic of concern following the Second World War (1945). The analysis stops in 2019 because this is the pre-COVID world. Emerging in late 2019, the COVID-19 epidemic has profoundly affected global mobility, migration, and thus citizenship regulations. The pandemic has led to numerous temporary measures, including border restrictions and emergency laws, which might not accurately reflect a country's underlying approach to dual or single citizenship. These temporary actions will likewise impact the variables that may be linked to the citizenship policy examined in this thesis - their data will be influenced and will not accurately represent the typical situation, but rather the situation under exceptional circumstances. By ending the study before the pandemic in 2019, this thesis focusses on long-term trends and policies rather than the anomalies introduced by this global health crisis.

The selection of all United Nations member states as the sample for a study on citizenship policies, encompassing single, dual citizenship with conditions, and dual citizenship, is justifiable on several grounds. First, including all 195 UN member countries ensures that the study covers a wide range of geographical, political, and cultural contexts. This broad scope is crucial because citizenship policies are deeply influenced by a country's historical, social, and legal frameworks. Using a worldwide sample will help the study to fully represent the variety of citizenship policies and so

offer a more complete knowledge of the elements influencing them.

Second, a global sample allows for extensive comparative analysis. Comparative citizenship policies allow the study to spot trends and differences that might not be clear-cut from a smaller or more homogeneous collection of countries. This can help in understanding how different political environments, economic levels, and cultural traditions influence the formulation and implementation of citizenship policies. Third, studying all UN member states enhances the generalisability of our findings. Policy-oriented research especially depends on generalisability since policymakers can use these ideas to benchmark and direct reforms in their own countries. With a comprehensive sample, our study's findings can offer valuable insights that are applicable across various countries' contexts. Fourth, the study minimises possible selection bias by considering all countries, therefore avoiding cherry-picking particular countries depending on their citizenship policy or other traits. Selection bias can skew results and lead to conclusions that are not universally valid. A complete sample set mitigates this risk, leading to more reliable and valid results (Collier & Mahoney, 1996; Geddes, 1990).

The universality of the sample promotes a methodical approach to data collecting and analysis even if data availability can be a difficulty in such a vast study. It also necessitates the use of consistent criteria and definitions across all cases, thereby enhancing the methodological rigor of this study. Last but not least, knowing citizenship policies from a worldwide standpoint can greatly help theoretical discussions in political science, especially in the domains of comparative politics and international relations. Practically, it aids in policy formulation and evaluation, providing a rich dataset for governments, international organizations, and NGOs to draw from.

## **5.2 Quantitative Analysis**

This section presents the structure of the dataset employed in this thesis, including an overview of the data's content, sources, and measurement. This part will then go to describe the statistical methods used in this thesis, including ordinal logistic regression and correlation analysis.

### **5.2.1 Dependent variable**

This thesis investigates the factors that influence a variety of citizenship policies. However, to facilitate further quantitative analysis, we will refer to the dependent

variables as "dual citizenship policy." We operationalize the dependent variable (DV) of "dual citizenship policy" as an ordinal categorical variable<sup>8</sup>, which has three values: single citizenship policy, dual citizenship policy with conditions, and dual citizenship policy. A single citizenship policy means that countries do not allow dual citizenship. Dual citizenship policy with conditions suggests that countries permit dual citizenship but impose restrictions, such as allowing only descendants to hold dual citizenship while requiring naturalising foreigners to renounce their previous citizenship. Furthermore, the dual citizenship policy indicates that countries allow dual citizenship without significant restrictions.

Such a fine-grained measurement of dual citizenship recognition is both rigorous and insightful in examining citizenship policies in this study. First, the majority of countries in the world have dual citizenship policies—about two-thirds. Countries with single-citizenship policies account for about one-third. Of the two-thirds of countries with dual citizenship policies, a proportion have conditional dual citizenship policies. A common condition is "giving citizens of the country's descent the right to have multiple citizenships but not allowing foreigners to have multiple citizenships." This distinction helps in identifying and analysing the nuanced legal and social implications of each policy type, thereby enhancing the theoretical depth of the study (M. P. Vink et al., 2013). Thus, the recognition of dual citizenship in this thesis will be further adjusted to be more in line with reality and boost the correctness and rigidity of the study.

Second, the citizenship policies of countries show a complicated interaction of historical, cultural, political, and financial aspects. A fine-grained approach captures these policy variations more effectively than a binary model. For instance, conditional dual citizenship might be influenced by ethnic homogeneity, diaspora politics, or integration concerns, which differ markedly from factors influencing policies that outright support or reject dual citizenship (Bloemraad et al., 2008). Third, by distinguishing between different forms of dual citizenship, the study can contribute to comparative politics by providing a more detailed basis for comparing how countries manage identity, integration, and rights. This approach facilitates nuanced comparisons across different governance frameworks, which can lead to more robust conclusions and recommendations for policy-makers (Howard, 2006). Last but not least, employing

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<sup>8</sup> An ordered categorical variable, such educational level (illiterate, elementary school, junior high school, high school, college, graduate school, etc.), is defined by a degree of difference between its several categories, so giving people a "semi-quantitative" sense. (Thrane, 2022).

a detailed categorisation of citizenship policy types allows for more precise operationalisation of the variables, which can improve the reliability and validity of the findings. It facilitates a more comprehensive examination of the correlation between citizenship policy and other aspects, including migration rate, political system, and economic motivations.

The data source is the EUI (European University Institute) Global Citizenship Observatory. The criterion is whether the country's citizenship laws or the Act specify that gaining citizenship in another country will cause one to lose citizenship in their own country. It is also crucial to find out if these rules apply to all people or merely to those with foreign background. This thesis will next ascertain if the country has a dual citizenship policy, one with conditions, or neither—that is, a single citizenship policy.

### 5.2.2 Independent variables

The study hypothesises nine independent variables (IVs) expected to influence citizenship policy: physical capital, human capital, relations with neighbours, country image, regime type, political stability and governance, immigration levels, emigration levels and colonisation experience.

Physical capital is gauged using foreign direct investment, net inflows percent of GDP, and GDP (current US\$). H1 suggests that higher physical capital favours having a dual citizenship policy. Countries may use dual citizenship as a strategic policy instrument to recruit and retain people who can bring in substantial physical resources, such as financial investments and advanced machines. This influx of resources from dual citizens is anticipated to bolster the host country's physical capital, thereby stimulating economic growth and development. Net inflows percent of GDP, or foreign direct investment, is the net flow of money to acquire a ten percent or more of voting stake in an entity running in an economy different from that of the investor. It is the total of equity capital, earnings reinvested, other long-term capital, and short-term capital as shown in the balance of payments (the World Bank, 2020b). When FDI constitutes a significant portion of GDP, it often indicates an economy's attractiveness to foreign investors, including dual citizens who may invest in their country of origin or affiliation. Therefore, FDI (% of GDP) can serve as an indicator for the level of physical capital influenced by dual citizenship policies, under the assumption that such policies can make a country more attractive for investment from its diaspora or dual citizens. FDI net inflows (% of GDP) measure the IV of physical capital, making it a

continuous variable. The continuous nature of its values allows for their division into smaller parts, thereby generating an infinite range of possible values (Thrane, 2022). The World Bank is the data source for FDI net inflows (% of GDP). This thesis uses data from 2019.

The whole size and health of an economy are shown by gross domestic product (GDP). World Bank (2020) claims that GDP at purchase's prices is the total gross value added by all resident producers in the economy plus any product taxes less any subsidy exclusion from the value of the items. Although GDP encompasses a wider range of physical capital, it serves as a framework for assessing the impact of FDI and other investment. In the analysis, GDP can serve as a baseline measure of economic activity, against which the specific contributions of dual citizens, as mediated by dual citizenship policies, can be assessed. The data source of GDP (current US\$) is the World Bank, using 2019 data. GDP is also a continuous variable. Academically, it is crucial to align the indicators with the theoretical framework of the hypothesis. According to scholars like Portes, Guarnizo, and Landolt (1999), dual citizenship can facilitate transnational economic engagement, including investment flows, which are critical for economic development. By choosing FDI (% of GDP) and GDP, the study is aligning with this perspective, indicating how dual citizenship policies might mobilise physical capital across borders, thereby influencing economic outcomes.

Indicators for human capital are “education index” and “population ages 65 and above (% of total population)”. According to the UNDP<sup>9</sup>'s Human Development Report derived from the UNESCO<sup>10</sup> Institute for Statistics (2020), the education index has been measured by combining average adult years of schooling with expected years of schooling for students under the age of 25, each receiving 50% weighting. The schooling Index, which displays the average number of years of schooling attained by people of a country, is one important indicator of human capital. Becker (2009) posited that education enhances the productivity and potential of individuals, serving as a fundamental principle of human capital theory. In addition, the Education Index measures both the amount and the standard of education, in line with the emphasis of contemporary human capital theory on the significance of knowledge and skills in economic progress (Schultz, 1961). Using this index allows for a nuanced analysis of

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<sup>9</sup> UNDP is the abbreviation for the United Nations Development Programme.

<sup>10</sup> UNESCO is the abbreviation for the United Nations Educational, Scientific and Cultural Organisation.

how educational attainment can influence economic growth and the strategic advantage of dual citizenship policies in attracting skilled individuals. Utilising 2019's data, the Human Development Report 2020 from the United Nations Development Programme serves as the Education Index's source. Education Index is a continuous variable.

The ageing population metric is significant in understanding the socio-economic challenges and the need for policy measures like dual citizenship to mitigate these impacts. Bloom, Canning, and Fink (2010) highlight the economic implications of ageing populations, including increased dependency ratios and potential labour market shortages. Dual citizenship policies can be a strategic response to these challenges, facilitating migration flows that replenish the workforce and support sustainable economic development. This demographic indicator, therefore, complements the Education Index by providing insight into the broader socio-economic context affecting human capital dynamics. The World Bank (2020) states that "population ages 65 and above (% of total population)" represents the proportion of the population that is 65 years of age or older. Population ages 65 and above (% of total population) is also a continuous variable. The data on "population ages 65 and above (% of total population)" is provided by the World Bank, using 2019's data. Using these two indicators, the study offers a comprehensive analysis of how human capital within the knowledge economy and demographic dynamics influence and impact dual citizenship policies.

The measure used for the relations with neighbours is the direct index from the Institute for Economics and Peace, using 2019 data. The Institute for Economics and Peace provides a worksheet, and the index of relations with neighbouring countries is derived from the Global Peace Index. The index of a country is classified into five levels (scoring criteria): 1 = Peaceful: none of the neighbours has attacked the country since 1950; 2 = Low: the relationship with neighbours is generally good, but aggressiveness is manifest in politicians' speeches or protectionist measures; 3 = Moderate: there are serious tensions and consequent economic and diplomatic restrictions from other countries; 4 = Aggressive: there are open conflicts with violence and protests; 5 = Very aggressive: there are frequent invasions by neighbouring countries (Institute for Economics and Peace, 2020). Relations with neighbouring countries is an ordered categorical variable.

Considering the conceptual alignment and empirical utility of the indicator, this study uses the "Global Freedom Score" as an indicator to measure the "country image" variable. Global Freedom Score is a continuous variable. The perception of the country

is a complex construct with social, cultural, political, and economic facets. Freedom House provides data on global freedom scores and rates people's access to political rights and civil liberties, which are crucial components of a country's image, in 210 countries and territories in its annual Freedom in the World report (Freedom House, 2020). This score reflects both internal governance practices and external perceptions of freedom and democracy, aligning well with the political and civil aspects of the country's image. In addition, the score is an internationally recognised and widely cited measure, reflecting the assessment of external observers on the country's respect for political rights and civil liberties. This external evaluation is crucial as country image involves not only self-perception but also how a country is viewed by international actors. Furthermore, the standardised nature of the Global Freedom Score allows for comparative analysis across countries and time, offering a systematic way to evaluate the relationship between country image and dual citizenship policies across different contexts and periods.

Taking empirical utility into account, the Global Freedom Score is regularly updated and publicly available, providing a consistent and reliable dataset for longitudinal studies. This facilitates tracking changes in a country's image over time and examining the impact of dual citizenship policies. Also, the score is based on rigorous methodology, combining on-the-ground study, expert analysis, and numerical ratings. This methodological rigor ensures that the score is a reliable quantitative indicator of the political and civil dimensions of country image. This thesis uses 2019's data on global freedom scores, provided by Freedom House.

While the Global Freedom Score is a valuable indicator for measuring certain aspects of country image, particularly related to political and civil freedoms, it is essential to acknowledge its limitations. First off, the score might not accurately reflect the social, cultural, or economic aspects of a country's image because it largely concentrates on political rights and civil liberties. So, to some extent, this study may meanwhile consider other variables, like GDP, education index, and religious diversity in this thesis, as supplementary indicators, capturing these additional dimensions to obtain a comprehensive view of country image. Second, the criteria used in determining the Global Freedom Score may reflect certain normative biases, emphasising Western liberal democratic norms. This thesis acknowledges that the findings are contextualised and consider the cultural and ideological underpinnings of the measured freedoms.

Regarding H5: democracies favour having a dual citizenship policy, "political

regime" is selected as the indicator in this analysis, employing the data provided by the Economist Intelligence Unit (EIU), which categorises regimes on a scale from 0 (authoritarian regimes) to 3 (full democracies). Regime type, therefore, is an ordered categorical variable in the study. The thesis uses 2019's data. The report of Democracy Index 2019 produced by EIU provides a snapshot of the countries of democracy worldwide for 165 independent states and two territories. This choice of indicators, for several reasons, is theoretically grounded and empirically viable. At its core, the concept of "democracy" pertains to the mechanisms through which power is acquired, exercised, and constrained. The political regime typology, which differentiates between authoritarian regimes, hybrid regimes, flawed democracies, and full democracies, encapsulates variations in these mechanisms (The Economist Intelligence Unit, 2019). The nature of a regime influences its policy choices, including those regarding citizenship, as H5 hypothesised. It has been discussed that democratic regimes are more inclined to have regulations that promote openness and inclusivity, such as allowing dual citizenship, because of their fundamental focus on rights, freedoms, and inclusivity. These regimes typically have higher levels of legal rationality, policy transparency, and citizen participation, which facilitate the adoption of dual citizenship policies (Faist & Gerdes, 2008; Spiro, 1997). Conversely, authoritarian governments often restrict liberties and rights—including those related to citizenship—in order to underlie political system control. The selected indicator is conceptually relevant.

Using "political regime" as an indicator allows for comparative analysis across a range of governance models. By classifying countries into distinct categories based on their democratic characteristics, it becomes feasible to systematically compare how different regimes approach the issue of dual citizenship. The choice of the EIU Democracy Index is also practically advantageous due to its widespread academic use and acceptance, regular updates, and methodological transparency. This ensures that the data is both reliable and applicable over time and across different geopolitical contexts.

H6 suggests that good political stability and governance favour having a dual citizenship policy. In this context, the Worldwide Governance Indicators (WGI) provide a relevant and robust framework for operationalising these concepts through two specific indicators: "political stability and absence of violence / terrorism" and "government effectiveness." The indicator of "political stability and absence of violence / terrorism" (henceforth, political stability) measures perceptions of the likelihood that



the government will be destabilised or overthrown by unconstitutional or violent means, including politically motivated violence and terrorism (the World Bank, 2024). The rationale for using this indicator to assess political stability lies in its comprehensive consideration of the security and continuity of the political environment. A stable political environment is critical in formulating long-term policies such as dual citizenship, which require continuity in policy application and minimal risk of policy reversal due to political upheavals. The stability of a political system enhances predictability for both citizens and policymakers, fostering an environment where dual citizenship can be more effectively managed and implemented.

The "government effectiveness" indicator evaluates the quality of public services, the civil service's independence from political pressures, the quality of policy formulation and implementation, and the credibility of the government's commitment to stated policies (the World Bank, 2024). Effective governance is indicative of a capable state, one that is likely to implement complex administrative processes such as those required for managing dual citizenship. Effective governance ensures that policies are not only adopted but are also implemented efficiently and fairly, increasing the overall credibility and attractiveness of the state's citizenship provisions to potential dual citizens.

These two indicators not only provide a measurable and comparative basis to evaluate different political environments but also align closely with the administrative and policy-oriented requirements essential for the successful implementation of dual citizenship. By using these indicators, the study can more rigorously test the hypothesis and understand the broader implications of governance on citizenship policies. Both indicators of "political stability" and "government effectiveness" are provided by the World Bank regarding the Worldwide Governance Indicators (WGI). And both indicators are continuous variables. This thesis uses the data from 2019.

Based on 2019 statistics, annual in-migration as a percentage of a country's total population and annual out-migration (emigration) present immigration levels and emigration levels. The entire population size counts, hence employing the proportion of the people immigrating or emigrating instead of the absolute value is justified. The same number of immigrants or emigrants entering a country with a low population can have a substantial impact, whereas in a country with a very large population, it might have little to no influence. Hence, using the percentage of the population immigrating or emigrating makes more sense here. The UN Population Division's data on the stock

of foreign migrants is the source of a country's in- and out-migration statistics. Often generated from demographic censuses, national statistics form the foundation for the stock of international migrants broken down by age, sex, and country or area of origin or destination. The dataset is available for 232 countries and areas of the world. The number is based on official statistics on the foreign-born or the foreign population (United Nations Population Division Department of Economic and Social Affairs, 2020). The current study counts immigrants and emigrants in every country using the international migrant stock, separated by country of origin and country of destination. Based on these data, immigration and emigration levels are respectively measured using immigrants and emigrants split by the total population<sup>11</sup> of every country (as % of the total population). Immigrants (% of the total population) and emigrants (%) are continuous variables both of which are indicators.

The indicator to measure the IV of colonisation experience is a binary variable. It contains two possible values: the presence or absence of a colonisation experience. The act of colonising other countries, the experience of being colonised by other countries, or a mix of the two are all included in the presence of colonisation experiences. The act of establishing settlements and imposing rule over an indigenous population and resources in an area by a foreign force is known as being the colonial. This involves not only the physical occupation of land but also efforts to transform the political structure, social fabric, and economy of the territory to benefit the colonising power. It typically includes the imposition of new cultural norms, languages, and governance systems, often at the expense of suppressing or eradicating local traditions, cultures, and political systems (Boswell, 1989; Ertan et al., 2016). Colonisation may be confused with imperialism. Conversely, imperialism is a more general term that characterises the strategy or idea of increasing a country's influence and authority by military might or diplomacy. It is often associated with economic exploitation and can occur without the establishment of permanent settlements (Hodgson, 1994; Knorr, 1952). Thus, while all colonial ventures are imperialistic, not all imperialist policies result in colonisation.

The classification of the Russian Empire and the Soviet Union as colonialist entities can be contentious. This study classifies countries that were historically part of the Russian Empire and the Soviet Union as having had colonial experiences. Several aspects of the historical behaviour of the Russian Empire and the Soviet Union support

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<sup>11</sup> Data on every country's total population are supplied by the World Bank (the World Bank, 2020a).

this classification. Given its spread over enormous swaths of Asia, the Caucasus, and the Arctic, the Russian Empire (1721–1917) is often considered in academic discourse as a colonial empire. Scholars like Kappeler have examined the empire's policies towards various ethnic and national groups within its borders, which included Russification and the imposition of the Orthodox Church. The empire's expansion involved military conquests and the establishment of settler colonies, particularly in Siberia and Central Asia. The Russian Empire exhibited characteristics typical of a colonial power, including the economic exploitation of conquered territories and cultural suppression of indigenous peoples (Kappeler, 2014).

The case of the Soviet Union (1922–1991) as a colonial power is more contentious. Martin in his book "The Affirmative Action Empire: Nations and Nationalism in the Soviet Union, 1923–1939", argues that the Soviet Union implemented policies that could be seen as colonial. These comprised the economic exploitation of some areas for the advantage of the country's government and the imposition of Russian language and culture at the detriment of regional customs and dialects (T. D. Martin, 2001). However, the Soviet Union also promoted policies of *korenizatsiya* (indigenization), which aimed to empower local languages and cultures, albeit within the framework of Soviet ideology (Khomyakov, 2020; Koplataдзе, 2019). On the other hand, scholars like Suny argue that while the Soviet Union exhibited some imperial tendencies, its ideological commitment to internationalism and anti-imperialism makes its classification as a colonial empire problematic (Suny, 1998). The Soviet Union's approach was paradoxical, exhibiting both suppressive and supportive measures towards nationalities within its borders.

The debate hinges significantly on the definition of colonialism. Traditional colonialism involves not just control over foreign peoples but also economic exploitation, cultural dominance, and settlement (Burbank & Cooper, 2011). In many ways, the Russian Empire clearly fits this model. The Soviet Union intertwined colonial practices with a rhetoric of socialist equality and development. This thesis will not discuss this in depth. Because the Soviet Union also had colonial practices, this study classifies countries that are historically involved in the Russian Empire and the Soviet Union as having colonisation experience. The study verifies whether each country underwent colonisation by examining its historical documents for all other countries.

### 5.2.3 Control variables

Five control variables—contagion effect, territorial size, religious variety, ratification of international human rights treaties, and multiparty system—are included to guarantee the analytical robustness.

Contagion effect is a binary variable. It contains two possible values: yes or no, influenced by the policy choices of the surrounding countries. This thesis takes the following steps to determine whether a country has experienced the contagion effect: First, look at what citizenship policies the country's neighbours have: whether one citizenship policy dominates, whether it's single citizenship or dual citizenship. Next, determine whether the country's citizenship policy aligns with the dominant citizenship policy; if it does, it indicates that the contagion effect has impacted the country. Should the policy under question differ, one can deduce that the contagion effect has had no bearing on the citizenship policy of the country. This suggests that citizenship policy of a country is unaffected by the contagion effect. Alternatively, the citizenship policies of the neighbours are 50% dual citizenship policies and 50% single citizenship policies; in this case, the contagion effect did not present.

Land area (sq. km) gauges the country's territory size's CV. A country's whole area excluding the area under inland water bodies, national claims to the continental shelf, and exclusive economic zones is referred to as its "land area". In most cases, the definition of inland water bodies includes major rivers and lakes (the World Bank, 2020d). The data source is the World Bank, using 2019 data. Territory size is a continuous variable. The religious diversity index measures the religious diversity control variable. The Herfindahl-Hirschman Index is a commonly employed metric in environmental and business research, used to assess ecological diversity or market concentration. Higher scores of religious diversity index indicate higher diversity (The Pew Research Center, 2012). Religious diversity is a continuous variable. The report on the religious variety of countries in 2010 was released by the Pew Research Centre in 2014. Despite deviating from the prior goal to obtain the most recent data in 2019, the 2014 data currently represents the most up-to-date information on religious diversity. It is deemed acceptable based on objective conditions and the availability of data.

The United Nations Human Rights Office of the High Commissioner (OHCHR) provides the data for the CV of "Ratification of International Human Rights Treaties." The United Nations Human Rights Office of the High Commissioner calculates each country's ratification status based on a total of 18 international human rights treaties: a country's consent to be bound by a human rights treaty under international law

(OHCHR, 2020). Ratification of International Human Rights Treaties is a discrete variable whose value can only be calculated in natural numbers or integer units<sup>12</sup>. This variable's value ranges from 0 to 18.

The last CV of the multiparty system indicates whether a country runs a multiparty system. The multiparty system is a binary variable in this thesis, including two possible variables: having the multiparty system or not. In this study, the term "multiparty system" refers to a political system characterised by the presence of two or more political parties. Without a multiparty system, a country can use one of three other systems: a military junta, a one-party system, or a non-partisan system. In some countries, there may be a dominant party. Such countries are counted as multiparty systems since dominant parties develop out of one-sided electoral and party constellations within a multi-party system. It allows (at least nominally) democratic multiparty elections, but the existing practices or balance of political power effectively prevent the opposition from winning power, thus resembling a one-party state. The thesis therefore checked each country's party system, recording the multiparty system or non-multiparty system for them. The CV of a multiparty system is measured as a dichotomous variable.

All data collected was from 2019, except for the CV of religious diversity for which the most recent year for which data was available was 2010. The 2019 data is used in the statistical analysis to identify whether there are associations between factors and the citizenship policy.

#### 5.2.4 Statistical techniques

Two main statistical methods form the quantitative phase: ordinal logistic regression and correlation analysis. Calculating correlation coefficients first helps one to investigate bivariate correlations between the DV and each of the hypothesised IVs and CVs. This first study offers understanding of possible relationships and collinearity problems among variables. This study investigated the descriptive statistics to get understanding of the distribution and basic descriptive features of the data before completing the correlation analysis (Akoglu, 2018). Descriptive statistics are vital for quantitative analysis since they offer a basic understanding of the data before more

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<sup>12</sup> For instance, only the units of measurement allow one to count the number of businesses, workers, tools, etc.

advanced techniques like correlation or regression is used (Akoglu, 2018). The descriptive statistics generated by SPSS.

The correlation coefficient ranges from -1 to +1 and indicates how strongly two variables are associated. A coefficient near +1 or -1 indicates a strong link, whereas one near zero indicates a weak one (Akoglu, 2018). The direction of the correlations will help us to determine whether my hypotheses are validated. If my hypothesis H1 holds that more physical capital promotes having a dual citizenship policy, for instance, we would expect a positive association between physical capital and the dependent variable of citizenship policies. Statistical significance is essential in guiding one whether to accept a link seriously as future evidence for a causal relationship—which the study will look at further in regression analysis—helps one determine. Even a little link can be statistically significant with enough sample size. Statistical significance is the probability that the association comes from random fluctuation in the sample or from the population from which the sample was obtained. Usually, it is expressed at the p-values less than 0.05 (Zhuo, B., Jiang, D., Di, 2020). Still, while making decisions, the theoretical explanation and the direction and size of the association should be just as significant.

Subsequent to the correlation analysis, an ordinal logistic regression is conducted to model the probability of a country adopting a particular citizenship policy type. This approach is suitable considering the DV's ordinal character. Two stages of the regression analysis—Model 1 and Model 2—are undertaken. Model 1 calls for all the hypothesised independent variables. Model 2 includes all suggested independent variables and control factors. Model 2 is necessary. It first manages confusing variables. An extraneous element influencing the dependent variable is a confusing factor. Lack of control for these factors might lead to an estimate of the effects of the hypothesised predictors biased. In Model 1, which consists just of the hypothesised elements, the absence of confounding factors could cause inflation or deflation. This model makes the often unrealistic assumption in social sciences and politics—that the hypothesised components are the only significant predictors. Secondly, the inclusion of control variables facilitates the precise specification of the model. A well-specified model reduces the risk of omitted variable bias. In general, the use of control variables in Model 2 enhances its data fitness. R-squared measurements often reflect this enhanced level of accuracy (Purhadi & Wulandari, 2012; Winship & Mare, 1984).

Furthermore, implementing Model 2 provides numerous benefits. Control elements

enhance the internal validity of the investigations. The observed relationships between the hypothesised variables and the outcome make less likely a random nature. By incorporating other components that can influence the result, the estimations of the predicted elements are more generalizable and trustworthy. Moreover, Model 2 helps scientists to see the separate influences of control variables. This can clarify other elements affecting the dependent variable, therefore improving the theoretical knowledge. This thesis seeks to provide light on the function of control variables including territorial size, religious variety, and contagion impact, so guiding more complex and successful citizenship policy judgements. With regard to the comparative analysis, the comparison of Model 1 and Model 2 facilitates an understanding of the robustness of the hypothesized relationships. If the effects of the hypothesised factors remain significant after the addition of control variables, this provides further evidence for the hypothesised relationships. This comparison serves as a form of sensitivity analysis, whereby the results are shown to change (or not change) with the inclusion of additional variables (Cokluk, 2010; Winship & Mare, 1984). In general, the inclusion of control variables enhances the predictive accuracy of the model. In predictive modelling, the inclusion of a more comprehensive set of predictors can enhance the model's ability to predict new data. The statistical analysis demonstrated enhanced predictive accuracy.

Generally, the ideas of strict and strong research technique guide the need and advantages of running Model 2 in ordinal logistic regression. Including both hypothesised and control variables in Model 2 offers a more complete and precise knowledge of the investigated relationships. This ensures that the results are more reliable and applicable to a wider range of situations, hence enhancing the validity of the findings and allowing for the assessment of other influencing factors. This iterative strategy is used to assess the robustness of the hypothesised correlations and the added explanatory power of control variables.

In ordinal logistic regression, holding all other variables constant, the coefficient (estimate) for an independent variable is the increase in the logarithm of the probabilities of being in a higher category of the dependent variable for a one-unit increase in the independent variable. This method clearly shows the log-odds connection and exactly expresses the mathematical link. Still, it may be more challenging especially for readers not familiar with statistical methods. One obtains the odds ratio (OR) by computing the exponential of the coefficient, which evaluates the

multiplicative increase in the likelihood of the dependent variable as the independent variable moves by one unit. This method converts the log-odds into a metric that is easier to understand, demonstrating the proportional increase in odds (Purhadi & Wulandari, 2012).

An OR larger than one implies that the probability of being in a higher category of the dependent variable rise as the independent variable rises. A smaller OR shows that the probability of being in a higher category of the dependent variable drop as the independent variable rises. When the OR is equal to one, it suggests no effect of the independent variable on the dependent variable. Odds ratio is more intuitive, as it explains the change in odds rather than log-odds. Easier for a wider audience to understand (Winship & Mare, 1984). Still, it calls for an extra step—exponentiating the coefficient—and occasionally can be deceptive if not thoroughly explained. In the interpretation of this study, the coefficient and the odds ratio will be combined. This twin strategy lets this study translate the data into a more understandable and accessible form as well as offer a strict statistical justification. This method guarantees correct and understandable interpretation of this study.

Beyond estimating relationships, regression analysis evaluates the predictive power of the model through goodness-of-fit tests such as R-squared. These measures will tell us how well the model in this thesis explains the variation in citizenship policies across countries, which is essential for both theoretical and practical implications of this study. Regarding the confidence and statistical relevance, regression analysis provides a structure to evaluate every predictor's statistical relevance under varying conditions, thereby modifying the confidence. This not only shows which elements are actually significant but also gives confidence intervals and p-values for every coefficient, therefore quantifying the uncertainty in the estimations (Cokluk, 2010).

### **5.3 Qualitative Analysis**

The objective of the qualitative element of this study is to enhance and balance the results of the quantitative analysis. The study intends to give a better contextual knowledge of the elements influencing the kind of citizenship policy of a country by including qualitative approaches. This thesis uses two main approaches: comparative case studies and single-case investigations. Every method is carefully chosen and applied to guarantee a thorough and complex analysis of the fundamental dynamics and causal mechanisms that quantitative data, by itself, cannot adequately clarify (Box-



Steffensmeier et al., 2008)..

Using a comparative case study approach, we investigate the specific environments in which dual citizenship regulations are formed and implemented. Under this approach, pairs of countries are closely examined whereby one country has a single citizenship policy and the other has a dual citizenship policy. The selection of these countries is guided by their distinct policy stances, enabling a focused analysis of the hypothesised variables within different political, economic, and social environments (Hsieh & Shannon, 2005).

The selection of countries for the comparative analysis is critical to ensuring the validity and relevance of the findings. Countries are selected depending on their different citizenship rules. This duality is necessary to emphasise the variations and parallels among the elements affecting their different policies. Furthermore, the chosen countries should reflect a wide spectrum of geopolitical and socioeconomic settings to guarantee that the results are not limited to one area or economic level and are rather general. Countries having plenty of easily available data sources are, to some degree, chosen to enable a comprehensive and thorough study (Box-Steffensmeier et al., 2008).

Policy documents, legislative records, scholarly literature, and other pertinent sources are carefully examined in order to create the comparative case studies. The study concentrates on the historical background, political and economic elements, social and cultural impact, and foreign policy. Examining significant legislative changes and their motivating reasons will help one to grasp the historical development of citizenship policy in any country. The paper will investigate how citizenship policies are shaped by political stability, type of government, economic situation, and quality of government. Moreover, this study will look at how policy decisions are influenced by immigration levels, emigration trends, religious variety, and national identity. International relations will also be taken into account, including the impact of ties with surrounding countries, international human rights obligations, and the epidemic effect on citizenship policy. By means of this comparative approach, the study intends to find trends and differences in how certain elements affect citizenship policies in different countries' environments. This approach not only locates the statistical links found in the quantitative analysis but also reveals the subtle and complicated interaction of elements influencing policy decisions (Sheingate, 2016).

Apart from comparative case studies, a single-case study of Italy is carried out to offer a detailed examination of a country having all three phases of citizenship policy:

single citizenship policy, dual citizenship policy with restrictions, and dual citizenship policy. Italy is a perfect subject for close study because of its distinct policy path and representation of the majority worldwide attitude on dual citizenship.

Italy is selected for the single-case study for a number of very strong grounds. First, Italy's citizenship policy development captures the whole range of the dependent variable, therefore offering a thorough case for analysing the elements affecting every level. Meanwhile, the shift in Italy's citizenship policy represents a dominant global trend, moving away from a single citizenship model towards a dual citizenship approach. Second, Italy represents the predominate tendency in citizenship policies globally among the 69% of countries with a dual citizenship policy. Third, the availability of large historical data on Italy's citizenship rules enables a comprehensive examination of the elements influencing policy changes. Fourth, preliminary quantitative study shows substantial statistical links between the hypothesised factors and Italy's citizenship rules, therefore justifying a closer inspection (this will be discussed in more detail in later quantitative analysis).

For example, Italy has a strong expatriate constituency. With millions of Italians living abroad, Italy has a large diaspora. According to the Italian Ministry of Foreign Affairs, the Italian diaspora is one of the largest in the world, with around 5.5 million Italians living abroad (O. Vonk, 2017; Zotti & Fassi, 2020). This significant expatriate community has historically affected Italian citizenship policy, arguing for rules that allow dual citizenship. The existence of a well-organized expatriate community, including organisations such as the *Comites* (Italian Foreigners' Committees) and the *CGIE* (General Council of Italians Abroad), emphasises the political and social case for dual citizenship. These bodies have actively lobbied for policies that protect the rights of Italians abroad, facilitate access to Italian citizenship and promote a sense of national identity among expatriates (Gabaccia, 2013). The political dynamics of Italy have also been shaped by the concerns and preferences of its diaspora. Several political groups and organisations have recognised the potential of the diaspora as a political group by including expatriate rights in their official policy statements. The Italian government, for example, has launched initiatives such as "AIRE" (Register of Italians Resident Abroad), which encourages the participation of Italian nationals in Italian politics and society, while at the same time monitoring their whereabouts (Schierup et al., 2008; Schlenker et al., 2017).

Examining Italy's approach to dual citizenship helps this study to investigate how

political, social, and historical elements have moulded its policy. This is essential for verifying the theories on the factors influencing dual citizenship policies. The study can look, for example, whether countries with a sizable expatriate population—like Italy—are more likely to embrace and uphold dual citizenship policy than those with less focus on their diaspora. Italy's experience provides rich empirical evidence for understanding the interplay between domestic policies and expatriate interests. The case of Italy can highlight the mechanisms through which expatriate communities influence national policy, offering insights into the broader dynamics of dual citizenship policy worldwide. By delving into Italy's legislative history, political debates, and societal attitudes towards its diaspora, the study can draw detailed conclusions and generate a nuanced understanding of the factors driving dual citizenship policies. Italy is relevant to the study as a whole and justifies its choice as a case study in terms of the objectives of the research on the elements affecting dual citizenship policy.

Italy's single-case study employs a several methodologically approach. Examined closely with a view towards significant legislative turning points and socio-political background for every policy change, shall be Italy's citizenship policy history. Examining legislative discussions, government reports, and policy documents will help one to understand the basis for every degree of Italy's citizenship policy. The study will consider secondary sources as well, analysing secondary sources such as academic articles, news reports, and legal commentaries to provide additional perspectives and contextual information. This single-case study aims to offer a deep and holistic understanding of the factors influencing citizenship policies in Italy, highlighting the specific dynamics and interactions that are unique to the country's context. By integrating qualitative insights with the statistical findings, the study seeks to provide a comprehensive and nuanced explanation of the determinants of dual citizenship policies.

## **Conclusion**

The time frame of this thesis is from 1945 to 2019, as 1945 marks the increased attention paid to the concept of citizenship, with the promulgation of the UN's *Universal Declaration of Human Rights in 1945*. The 2019 cut-off point for the time frame was determined by the emergence of the novel coronavirus (COVID-19) in 2019. The implementation of temporary control and migration policies by numerous countries has had an impact on the observation of certain variables. This thesis is focused on long-

term trends and policies rather than the anomalies introduced by the global health crisis.

The study commences with a quantitative analysis. The preliminary relationship between the hypothesised factors and the citizenship policy is obtained through statistical analysis, testing the hypotheses generated in the theoretical framework. After that, qualitative case studies will help to further investigate the statistically found links. The qualitative study will offer a more thorough and complex conversation on the interactions among several elements and citizenship rules. The case comparison in the qualitative study is a horizontal comparison that enables the observation of how elements in different countries lead countries to adopt different forms of dual citizenship legislation. The qualitative analysis of a single case in Italy involves a longitudinal comparison. Through historical analysis, policy analysis and secondary literature analysis, it can be seen that with the passage of time, even in the same country, the relevant factors will change in the state, thus affecting the change of a country's citizenship policy. The mixed-methods approach combines quantitative and qualitative methodologies in this thesis ensures a robust analysis and nuanced understanding of the determinants of dual citizenship policies.

## **CHAPTER 6**

### **BIVARIATE ANALYSIS OF ECONOMIC, POLITICAL, AND CULTURAL IMPACTS**

This chapter examines the bivariate relationships between the hypothesised factors and citizenship policies, along with a correlation matrix for all variables generated by SPSS. Essentially, this chapter will evaluate the hypotheses within the theoretical framework using their statistical relationships. Firstly, section 6.1 examines the descriptive characteristics of the dataset, understanding its distribution and basic descriptive characteristics, thus providing a solid foundation for the subsequent iterative analysis. Section 6.2 is an examination of Spearman's rank correlation. Section 6.3 then considers the issue of collinearity with the entire correlation matrix.

#### **6.1 Descriptive Statistics**

Prior to commencing the statistical analysis, let us promptly review the hypotheses that we will be testing based on our previous theoretical framework. These hypothesised factors are converted into variables during data processing. What factors are associated with a country's citizenship policy, according to the research question. The study's dependent variable, or variable of interest, is citizenship policy, which includes single citizenship policies, conditional dual citizenship policies (which allow dual citizenship to descendants but do not allow naturalised foreigners to hold dual citizenship), and dual citizenship policies. The theoretical framework generates nine hypotheses, testing physical capital, human capital, relations with neighbours, country image, regime type, political stability and governance, immigration levels, emigration levels, and colonisation experience. The nine hypotheses are as follows:

H1: Higher physical capital favours having a dual citizenship policy.

H2: Higher human capital favours having a dual citizenship policy.

H3: Good relations with neighbouring countries favour having a dual citizenship policy.

H4: A good country image favours having a dual citizenship policy.

H5: Democracies favour having a dual citizenship policy.

H6: Good political stability and governance favour having a dual citizenship policy.

H7: High immigration levels favour having a dual citizenship policy.

H8: High emigration levels favour having a dual citizenship policy.

H9: The colonisation experience favours having a dual citizenship policy

In addition to the three hypothesised variables—physical capital, human capital, political stability and governance—there are two indicators to measure each of them: FDI, net inflows (% of GDP), and GDP are two indicators used to measure the independent variable (IV) of physical capital. The education index and population ages 65 and above (% of the total population) are two indicators to measure the IV of human capital. Political stability and the effectiveness of government are two indicators to measure the IV of political stability and governance. Other variables each have a single indicator for measuring themselves. In addition to nine hypothesised factors, five control variables (CVs) are also considered to increase the rigour and robustness of the analysis and conclusion. They are the contagion effect, territory size, religious diversity, ratification of international human rights treaties, and multiparty systems.

Table 6.1 offers a thorough overview of the data, encompassing numerous indicators that are pertinent to citizenship policies. Furthermore, it aids in pinpointing specific factors and necessary precautions to consider before advancing with the correlation analysis.

**Table 6.1: Descriptive Statistics of Citizenship Policies and Factors**

	N	Minimum	Maximum	Mean	Std. Deviation
Dual Citizenship Policy	195	0	2	1.29	.914
Foreign Direct Investment, net inflows (% of GDP)	180	-11.790	234.249	6.06643	23.710174
GDP (current US\$)	188	54123198.566	21380976119000.000	458460077809.71560	1957945850957.374300
Education Index	188	.249	.948	.65974	.173558
Population Ages 65 and Above (% of total population)	193	1.172	35.621	8.98813	6.663809
Relations with Neighbours	161	1	5	2.39	1.061
Country Image (global freedom scores)	193	0	100	59.17	30.088
Regime Type	163	0	3	1.26	1.059
Political Stability	193	-2.771	1.620	-.07635	.984800
Government Effectiveness	193	-2.384	2.232	-.07230	.996436
Immigrants (% of the total population)	195	.043	100.000	10.00456	15.920188
Emigrants (% of the total population)	195	.441	236.528	14.37806	23.368640
Colonisation Experience	195	0	1	.69	.463
Contagion Effect	195	0	1	.59	.492
Territory Size (km2)	193	2.027	16376870.000	670745.37833	1840359.349814
Religious Diversity Index	195	.000	9.000	3.03333	2.179654
Ratification of 18 International Human Rights Treaties	195	2	18	11.96	3.630
Multiparty System	193	0	1	.87	.342
Valid N (listwise)	150				

Table 6.1 presents the distribution, normality, outliers, and number of observations (N) for each variable relevant to the study on citizenship policies. We can see that the number of observations varies across variables, indicating either missing data or non-reporting countries for specific indicators. For instance, the relations with neighbours variable has a total of 161 observations, which is less than the maximum possible amount of 195. This gap occurs because several international entities may not provide

numbers for every country on a regular basis. International institutions do not collect data on specific countries' relevant indicators if the countries themselves do not provide their own national statistics. For example, the Institute for Economics and Peace only collected data from 163 countries and territories in 2019. However, certain indicators and statistics from international organisations, such as the World Bank's statistics on the percentage of people 65 and older in relation to the total population, offer a more thorough perspective. When considering normalcy, certain factors, such as GDP and foreign direct investment, have a wide range of values and are likely to have a distribution that is not symmetrical, as indicated by the mean and standard deviation. For example, the standard deviation (23.71) relative to the mean (6.07) indicates a highly skewed distribution with potential outliers in the indicator of FDI net inflows (% of GDP), particularly given the wide range (-11.79 to 234.249) and negative minimum (-11.79). In terms of GDP, a very high standard deviation indicates a right-skewed distribution, with extreme values significantly influencing the mean. The Education Index indicator is more normally distributed compared to economic indicators, but still shows some variability. Besides, variability in the Population Ages 65 and Above (% of total population) indicator is also high; the data may have a right-skewed distribution given that the ageing population is low in many countries. Data skewness can impact the robustness of the Pearson correlation. Outliers primarily appear in economic indicators (FDI and GDP), where the maximum values are significantly higher than the mean, suggesting the presence of wealthy or investment-heavy countries that could potentially skew the analysis.

Based on the data acquired in this study, the responses and processing metrics can be described as follows: First, the analysis will be conducted without excluding countries based on the presence of missing values. It would be a suitable technique, particularly when the objective is to incorporate a comprehensive and inclusive dataset, encompassing countries from all over the world, in this thesis. It is essential to include all countries in the study to ensure its integrity and comprehensiveness, especially when examining global patterns. This is required to improve the results' generalizability.

Second, the correlation model selection must consider the nature of the data (size and distribution) as well as the existence of outliers, taking into account the features of the dataset and the specific research objectives. In this thesis, the dependent variable, Dual Citizenship Policy, is an ordinal variable (categorical with a meaningful order but no consistent intervals between categories). As the descriptive analysis shows, a large



number of the independent variables in the study are ratio scales (e.g., GDP, FDI), but with extremely skewed distributions and outliers. In terms of distribution and skewness, variables such as GDP and FDI net inflows (% of GDP) are highly skewed and contain outliers. Under such circumstances, Pearson correlation, which presupposes linearity and normalcy in the data distribution, would not yield trustworthy results. The ordinal nature of the dependent variable also suggests that a Pearson correlation, which assumes an interval or ratio scale with linear relationships, may not be suitable. Considering these issues, Spearman's rank correlation coefficient would be a more suitable option for various reasons: Spearman's correlation is an initial non-parametric test that does not make any assumptions about the data following a normal distribution. It is based on ranks, making it less sensitive to outliers and skewed distributions. Moreover, it is suitable for both continuous and ordinal data, making it ideal for analysing the relationships involving my ordinal dependent variable and skewed independent variables. Moreover, Spearman's correlation measures the strength and direction of a monotonic relationship, whether linear or not, which is more relevant in the context of my varied data scales and distributions.

Third, considering the possibility to keep all entries, the data difficulties, and the kind of the variables, this study will use paired deletion to handle missing data. This method computes correlations between every variable pair using all the data pairs, so conserving more data in general. Following these guidelines will allow this study to effectively aggregate data from all countries and use Spearman's rank correlation to manage non-normality and missing data in the analysis. This non-parametric statistical test does not assume any normal distribution of the variables. Advantageous in the framework of data variability and range issues is its resistance to skewed data and outliers.

## **6.2 Spearman's Rank Correlation**

Getting the correlation coefficient was the next stage. The choice of Spearman's rho rested on its capacity to manage ordinal data and its insensitivity to non-normal distributions. Table 6.2 presents the correlation coefficients between each factor (IVs and CVs) and citizenship policy (DV). The statistical analysis in this thesis depends critically on the pairwise correlations between each independent variable and the dependent variable being examined utilising the correlation matrix among all variables.

**Table 6.2: Correlation Coefficients**

	Correlation Coefficients	N
Physical Capital		
Foreign Direct Investment, net inflows (% of GDP)	0.166*	180
GDP (current US\$)	-0.046	188
Human Capital		
Education Index	0.074	188
Population Ages 65 and Above (% of total population)	0.12	193
Relations with Neighbours	-0.059	161
Country Image (global freedom scores)	0.160*	193
Regime Type	0.131	163
Political Stability and Governance		
Political Stability	0.043	193
Government Effectiveness	-0.039	193
Immigration Levels	-0.003	195
Emigration Level	0.13	195
Colonisation Experience	0.107	195
<hr/>		
Contagion Effect	0.297**	195
Country's Territory Size	-0.042	193
Religious Diversity	-0.159*	195
Ratification of International Human Rights Treaties	0.181*	195
Multiparty System	0.114	193

Notes: \* $p < 0.05$ , \*\* $p < 0.01$ .

H1 indicates that higher levels of physical capital, as indicated by GDP and FDI net inflows (% of GDP), favour having dual citizenship policies. This hypothesis rests on the assumption that by facilitating dual citizenship, countries can attract individuals who possess considerable physical capital—money and machinery—which can subsequently boost the national economy. Countries want economic development and higher physical capital, so they have dual citizenship policies. Let us delve deeper into this hypothesis, examining the implications and the supporting empirical evidence in this correlation section.

The reported association coefficient between dual citizenship policy and FDI net inflows (% of GDP) is 0.166\*. Despite the small link, it suggests a slight trend: countries with higher percentages of FDI net inflows typically have policies that permit or promote dual citizenship. Dual citizenship can be seen from the perspective of economic incentives for countries to draw foreign investments, where it may be a strategic component of a more general economic strategy aimed at attracting foreign capital and expertise. On the other hand, the correlation coefficient between GDP and dual citizenship policy is -0.486, implying a somewhat minor yet unfavourable link. This suggests that the availability of dual citizenship policies does not always match rising GDP in a positive way. This negative correlation, despite its seemingly insignificant nature, implies that countries with greater economic power might not prioritize attracting individuals based solely on their economic capabilities, or they might have enacted limited citizenship laws influenced by factors beyond economic growth.

Conceptualising dual citizenship in relation to economic indicators, it can be realised that the choice of citizenship policies is complex and influenced by a myriad of factors beyond mere economic calculations. These include historical migration patterns, geopolitical considerations, national security, cultural identity, and so forth, which the study will test later. While economic considerations play a significant role, they are not the only ones. Theoretically, the justification for tying dual citizenship with physical capital investment—that is, FDI—aligns with neoliberal economic ideas, whereby the mobility of capital and labor is considered favorable for development. However, the correlation coefficients indicate a weak association in the empirical data. This discrepancy raises questions about the theory's external validity and causal routes.

This analysis then examines the influence of human capital on the passage of dual citizenship policy, with a focus on two indicators: the Education Index and the percentage of the population aged 65 and above. H2 posits that higher human capital, as manifested through these indicators, is conducive to having dual citizenship policies. This assumption is predicated on the rationale that dual citizenship can help mitigate demographic challenges such as ageing populations and labour shortages while also potentially boosting economic performance by attracting skilled and knowledgeable individuals. The Education Index and dual citizenship policies have a correlation coefficient of 0.074, whereas the percentage of the population aged 65 and above has a correlation coefficient of 0.12. Both coefficients indicate positive associations, albeit

weak, with dual citizenship policies. The correlation coefficient between education index and dual citizenship policy (0.074) suggests a very mild positive relationship between the level of education within a country and the presence of dual citizenship policies. Theoretically, dual citizenship policies facilitate movements of dual citizens as well as talents and, therefore, have a higher education index, which indicates a more educated population. However, the feeble association indicates that, although there may be a tendency in this direction, it lacks the strength to confidently claim a substantial direct impact. Similarly, the correlation coefficient between Population Ages 65 and Above and Dual Citizenship Policy (0.12) points to a slightly stronger, yet still weak, positive correlation. The rationale here is that countries facing demographic ageing might see dual citizenship as a strategic policy to attract younger workers and offset population ageing. This could be part of broader demographic and economic strategies to sustain labour markets and social security systems. Again, the modest size of the correlation suggests that other factors likely play more substantial roles in shaping citizenship policies.

Given the low magnitude of both correlation coefficients, it is crucial to critically evaluate H2. Although there is a positive link, the level of these correlations does not strongly support the assertion that increased human capital, as assessed by these indicators, significantly affects dual citizenship policies. Factors beyond just demographic and educational structures likely influence dual citizenship policies. These might include geopolitical considerations, national security concerns, and integration attitudes towards immigration and citizenship, which will be analysed later. Their impact on a country's citizenship may overshadow or confound the effects of human capital on dual citizenship policy. The results imply to policymakers that although demographic and educational aspects are important, dual citizenship policies call for a comprehensive strategy considering a greater spectrum of social, political, and economic aspects. More general strategic plans, addressing several aspects, should include policies aimed at drawing human capital from dual citizenship. Overall, the empirical data given by the correlation coefficients points to a more complex reality, even though H2 that higher human capital promotes dual citizenship policy is appealing.

Assuming that such openness would not cause problems or hurt national interests, H3 suggests that when two neighbouring countries have good relations with each other, they are more likely to support dual citizenship policies, and those policies will make it easier for people to get both citizenships. The correlation coefficient between the

index of relations with neighbours (a higher index of relations with neighbours indicates more aggressive relations) and the citizenship policy spectrum (dual citizenship policy: value 2, conditional dual citizenship policy: value 1, and single citizenship policy: value 0) is -0.059. This negative association implies that when aggressiveness in neighbour interactions rises, there is a minor inclination towards less open citizenship policies (i.e., from dual to single citizenship policies). Given the negative association, it could imply that countries with close ties to one another are more likely to limit citizenship choices. This could be a calculated move to more tightly manage population dynamics and national security issues, potentially preventing dual allegiances that would complicate internal and foreign policy. In the framework of aggressive neighbour relations, the inclination towards single citizenship policies could indicate a larger rigidity in foreign and domestic policy, where countries give top priority to preserving strict control over citizenship to prevent aggravation of tensions or vulnerabilities.

Reacting to H3's theoretical foundation, hostile interactions with neighbours sometimes raise security issues that affect citizenship policies. Countries may perceive dual or conditional citizenship as increasing the likelihood of political unrest, espionage, or conflicts of allegiance among citizens. Herzog (2010) and Scriver, Bartsch, and Rashid (2016) conducted studies on this topic. This study emphasises the need for policymakers to include international connections in the conception of citizenship laws. More limited citizenship policies could have a strategic or security-driven justification. In the framework of hostile neighbour relations, the correlation study shows a small tendency towards more limited citizenship policies overall. Though such a link is modest, the result emphasises the need for a sophisticated and contextually aware approach to policy formation because it encourages a wider examination of how international interactions affect domestic policy decisions.

H4 indicates that a positive country image favours having a dual citizenship policy. Usually able to boost a country's soft power and raise its global profile, dual citizenship policies are considered as a mirror of a country's acceptance, inclusivity, and commitment to diversity. Particularly statistically significant at the 0.05 level, the 0.160\* correlation coefficient between dual citizenship policies and a good country image (as indirectly assessed by high global freedom rankings) shows a positive but moderate association. This implies that liberal dual citizenship policies are rather more prevalent in countries with higher global freedom scores, which show better respect for political rights and civil liberties. The positive sign of the coefficient aligns with H4,

which suggests that a good country image may encourage countries to have policies that further project an image of tolerance and global expectation.

Though the relationship is modest, the correlation coefficient overall supports the idea that a positive country image encourages countries to have dual citizenship policies. Global freedom scores are a great option for measuring country image since they are comprehensive measures of political and civil liberty. This study also recognises, as previous chapters have demonstrated, that global freedom scores may not fully reflect all aspects of a country's global image, such as cultural vibrancy or economic stability, thus affecting dual citizenship policies. The moderate correlation suggests that other variables may also play significant roles. Future models, like multivariate analysis, should include variables such as economic performance and demographic trends to isolate the specific impact of country image on dual citizenship policies.

The study examines H5 by looking at the relationship between regime type and dual citizenship policy. Democracies are more likely to introduce and maintain dual citizenship policies compared to more authoritarian governments. The data show a correlation of 0.131 between the citizenship policy type (from single to dual citizenship) and regime type (from authoritarian to full democracy). This coefficient indicates a tiny but positive relationship, implying that as countries become more democratic, the tendency to have more inclusive citizenship policies grows slightly. It is similar to H5, which states that a government's essence influences its governance policies, particularly those related to citizenship. Democracies that value personal liberty, human rights, and international involvement tend to support dual citizenship more widely. This is considered a reflection of their openness to global movement and multicultural integration. Authoritarian administrations, which prioritise national unity and state authority, may view dual citizenship as a threat to state allegiance and security.

The modest value of the correlation suggests that, although the link exists, it is not particularly strong. Several factors, including economic considerations, historical migration patterns, international links, and internal political dynamics, contribute to the intricacy of citizenship policy beyond the democratic character of the government. Although democratic countries are trending towards more open citizenship policies, numerous other elements could affect the domain of citizenship. The results suggest that coupling reforms towards more democracy with more liberal citizenship policies could enhance internal diversity and potentially improve global perceptions for legislators in transitioning or hybrid regimes. The correlation study shows a generally

weak but favourable link between dual citizenship policies and the democratic character of a government.

According to H6, dual citizenship initiatives to be carried out and controlled benefit from strong political stability and governance. The argument is based on the understanding that political stability makes it possible for the intentional development of complex policies such as dual citizenship, which demand careful balancing of national security concerns with personal liberty. On the other hand, the implementation and maintenance of these policies depend on good governance to ensure that they respond dynamically to both domestic and global trends. A correlation of 0.043 exists between political stability and the availability of dual citizenship policies. The correlation coefficients suggest a weak positive relationship between political stability and dual citizenship policies. The small positive correlation suggests that more flexible dual citizenship policies may be associated with greater political stability, i.e., a lower likelihood of violent regime change or severe instability. Stable political environments may provide the necessary groundwork for considering and implementing policies that require long-term planning and commitment, such as dual citizenship. The modest strength of this link, however, suggests that political stability by itself could not be a strong predictor of dual citizenship policy. The correlation coefficient between government effectiveness and dual citizenship policy is -0.039. Government effectiveness and dual citizenship policies show a quite weak negative link, as indicated by the correlation coefficients. The slight negative correlation is counterintuitive to the hypothesis. It might suggest that in contexts where government effectiveness is high, there is slightly less inclination to have dual citizenship policies. One could interpret this in various ways: effective governments might enforce stricter nationality controls and policies, or they might prioritise other aspects of governance over the liberalisation of citizenship policies.

The unexpected findings, particularly the negative correlation with government effectiveness, call for further research to explore these relationships. Qualitative techniques such as case studies or interviews with policymakers could help achieve a deeper understanding of how particular aspects of governance affect citizenship policies. A comparative study of several regimes and stability conditions could also help to clarify this complicated interaction. The extremely small correlations found in this study suggest that, despite a link between dual citizenship policies, governance, and political stability, this is not a strong one overall. The findings, particularly with

regard to government efficiency, contradict the first assumption and draw attention to the complexity of policy settings, where many and possibly contradictory components influence policy outcomes.

H7 suggested that large immigration numbers inspire countries to implement dual citizenship policies in order to keep immigrants and maximise their contributions to labour markets, population growth, and intellectual output. This theory makes sense since countries can use dual citizenship as a tool to secure the economic and demographic benefits that immigrants bring. Dual citizenship policies may increase a country's appeal to immigrants by giving them a sense of security and belonging and promoting permanent relocation. Immigrants are often important contributors to the labour force and can help counteract demographic declines (Foner, 2005; Kaushal, 2019). People may view dual citizenship as a reward or incentive for their integration and retention. According to Bloemraad, Korteweg, and Yurdakul (2008), Papazoglou (2010), and Bevelander and Pendakur (2012), a broader integration policy that fosters loyalty and a deeper connection to the host country while respecting the immigrants' original national ties may also include offering dual citizenship. However, a correlation coefficient of -0.003 suggests that the empirical evidence discovers a very weak and nearly non-existent relationship between the percentage of immigrants in the population and having dual citizenship policies.

With a correlation coefficient of -0.003, so close to zero, there is essentially no linear relationship between the percentage of immigrants and the likelihood of a country having a dual citizenship policy. This result challenges H7 and suggests that other elements may be more critical in shaping dual citizenship policy. The negligible magnitude indicates that, at least in a linear sense, the proportion of immigrants in a country does not influence dual citizenship policy decisions. Although the negative sign is very slight, it contradicts expectations and essentially suggests no influence. The correlation has little statistical significance, but it has a crucial practical significance in that it raises the possibility that the assumption that countries have dual citizenship policies primarily to retain immigrants may not be accurate, or at least not have a significant influence on the formulation of such policies or legislation.

Given the remarkable correlation shown, additional studies is required to investigate this complex subject. Case studies could help us better grasp the reasons for dual citizenship policies. Comparison study is also a viable alternative. Comparing countries with similar immigration rates but differing citizenship policies may attract



attention to additional crucial aspects. In addition, policy analysis could benefit from investigating how political discussion, public opinion, and international links influence citizenship policies. The low correlation coefficient suggests that the correlational evidence does not support H7 that large immigration levels have a direct impact on having a more tolerant and inclusive citizenship policies. This suggests that factors other than the desire to retain immigrants could motivate dual citizenship policies.

According to H8, high levels of emigration encourage countries to have dual citizenship policies. These policies are potentially strategic tools used by countries to maintain a connection with their diaspora, attract returning emigrants, and stabilise the workforce by encouraging the immigration of skilled individuals from other countries. The correlation coefficient between emigration levels and dual citizenship policies is 0.13. It suggests a modest positive relationship between the proportion of emigrants and having dual citizenship policies. The 0.13 correlation coefficient suggests that a country's chances of enacting more liberal dual citizenship policies rise somewhat with the number of emigrants.

Migration studies, which often highlight how states use citizenship as a lever to manage the demographic and economic challenges posed by migration, form the foundation of H8. Mayr and Peri (2008) and Humphries, N., Connell, J., Negin (2019) see dual citizenship as a facilitative measure for maintaining ties with a country's diaspora and encouraging investment and return migration, thereby benefiting the national economy and social fabric. Countries that have dual citizenship policies may use their diaspora for political influence, economic growth, and cultural relations. By allowing dual citizenship, states can make it easier for emigrants to return and reintegrate into their home country without the need to relinquish their acquired citizenship abroad, potentially reversing brain drain (Mayr & Peri, 2008; Thaut, 2009). Although the correlation coefficient is positive, its comparatively low magnitude suggests that the association, while existing, is not notably strong. This suggests that other factors, besides emigration levels, might be influencing having dual citizenship policies.

All things considered, the coefficient shows a modest but positive link between emigration rates and having dual citizenship policies, which somewhat supports H8. This suggests that, although emigration could affect these policies, it is most likely only one of numerous factors impacting a state's decision-making in this sense. The results support a complicated perspective of how countries react to demographic changes and

help one grasp the complexity of citizenship policies in the framework of world migration.

H9 proposed that a history of colonisation influences the likelihood of a country having dual citizenship policies. This concept is based on the idea that dual citizenship policies may facilitate individuals' mobility between former colonies and colonial powers, thus supporting economic and social links. The 0.107 correlation coefficient is between the colonisation experience (binary variable) and dual citizenship policies. The hypothesis is grounded in historical institutionalism, emphasising the long-term impact of historical events on the current actions of governments. The colonisation experience, whether one was a colonist or a colony, could create enduring transnational linkages that would make dual citizenship regimes more appealing and sensible (Fiore, 2018; Koebner, 2017; Paynter, 2017). These policies might serve as mechanisms to strengthen economic ties, enhance diplomatic relations, and facilitate the personal and professional mobility of individuals who have connections to both the colonising and colonised states (Paynter, 2017; Sai, 2019).

The correlation coefficient of 0.107 shows a moderate but positive relationship between dual citizenship policies and colonisation experience. These findings suggest that countries with a colonisation background are slightly more likely to have dual citizenship policies than those countries without such a past. Maintaining contact with its diaspora through dual citizenship can substantially enhance remittances, commerce, and cultural diplomacy. While the coefficient shows a positive relationship, the relatively low magnitude suggests that the influence of colonisation history on dual citizenship policy is present but not overwhelmingly strong. This indicates that other factors might also play significant roles in the decision to have such policies. Aside from that, the correlation has no statistical significance.

Admittedly, there are some methodological considerations and limitations that may lead to this weak correlation. For instance, the binary classification of colonisation experience could oversimplify the complicated effects of colonisation. The variety of colonisation experiences and their diverse legacies could influence dual citizenship policies in ways that this binary variable would not be able to capture. Given the association's low strength, further investigation should probe the dynamics of this link in greater detail. Future directions of inquiry could be case studies that analyse particular countries with a colonisation past and provide better knowledge of how these historical links influence current policy decisions. Furthermore, examining countries

with comparable colonisation pasts but differing citizenship policies should help to elucidate other factors affecting policy decisions. Furthermore, measuring the advantages of dual citizenship initiatives in reaching intended social and economic results in countries with a colonisation heritage could help to evaluate their performance.

Finally, although the association is small, the study confirms H9 that colonisation experience increases the possibility of implementing dual citizenship policies. This suggests that while historical ties resulting from colonisation can influence policy, they are just one of several factors that need to be considered. The results demand a more sophisticated strategy that takes into account several factors and results, but they also emphasise the need to take colonisation experiences into account when developing citizenship policies. This multifaceted approach is essential for understanding the complex interplay between historical legacies and contemporary global migration dynamics in shaping citizenship policies.

As for statistical significance, there is another question worth discussing: if the sample size of this study includes all countries in the world (195), why are the correlation coefficients of many variables still not statistically significant? There are several reasons why this study observed fewer statistically significant correlation coefficients than expected. This study tries to collect all countries' data. However, for several indicators, the available data is not up to 195, which could be around 160. The dataset's missing values can result in a smaller effective sample size for each correlated pair of variables. This decrease can influence the power's sensitivity to finding important linkages. Moreover, assuming moderate effects, having 150 cases in a correlation study usually offers a good sample size to find statistically significant associations. Still, a good number of the independent variables have either a weak or negligible link with the dependent variable. Inadequate correlations, even in considerably large samples, may fail to achieve statistical significance. This could be due to the variables' non-linear nature or the relationships' complexity, which standard correlation analysis may not effectively capture. Although many variables in the study align with the hypotheses, the strength of their associations is weak, making it challenging to achieve statistical significance.

Several control variables have also been considered when exploring factors associated with the implementation of dual citizenship policies. These include the contagion effect, territory size, religious diversity, ratification of international human rights treaties, and the presence of a multiparty system. The correlation coefficient

between the contagion effect and dual citizenship policies is 0.297\*\*. The contagion effect, presumably measuring whether neighbouring countries' policies influence a state's policy, shows a relatively strong and positive correlation with having dual citizenship policies. This coefficient, marked with double asterisks, indicates statistical significance at the 0.01 level. Dual citizenship policies imply that they could spread regionally when countries change to fit or coincide with their neighbour's migration and citizenship systems. This result supports the theory of policy diffusion in geopolitical areas, in which countries sometimes follow patterns set by their neighbours to keep competitive or cooperative positions. Larger countries are less likely to have extensive dual citizenship policies because the negative relationship (-0.042) between territorial size and dual citizenship policies is negligible. Bigger governments may face more complex administrative and governance issues, leading to stricter citizenship controls aimed at preserving internal unity.

The correlation coefficient between the religious diversity index and dual citizenship policies is -0.159\*, statistically significant at the 0.05 level. There is a moderately negative correlation, with a statistically significant but weak relationship. This suggests that countries with higher religious diversity are somewhat less likely to have liberal dual citizenship policies. This could be understood in terms of national identity and social cohesiveness, whereby extremely varied cultures may view dual citizenship as aggravating the already fragile equilibrium of internal inter-religious relations. With regard to the ratification of international human rights treaties, dual citizenship policies show a positive correlation with a statistically significant (0.181\*), suggesting that countries more involved with international human rights frameworks are somewhat more likely to have dual citizenship policies. International norms and legal systems shape national policies, particularly in areas that impact individual freedoms and global mobility, as this relationship demonstrates. Although weak, the correlation coefficient of 0.114 shows a positive relationship. It suggests that countries with multiparty systems, which may reflect more general democratic processes, are more likely to have dual citizenship policies. Democracies increasingly use inclusive and participatory approaches to governance, allowing diverse viewpoints and interests to shape more transparent citizenship policies.

Eventually, the analysis of these control factors produces significant fresh knowledge on the intricate interaction of factors affecting citizenship policies. While certain relationships—like the contagion effect and human rights treaty ratification—

show notable positive correlations, others—like religious diversity—show more complex difficulties. These results underline the need to use several strategies and the difficulty of developing policies in a society linked by connectivity. To validate these conclusions and investigate their relevance in different environments and countries, both the hypothesised causes and the controls need more empirical testing. This covers longitudinal studies meant to more precisely depict the causal dynamics. Embracing this complexity will help the study offer a more accurate and useful analysis of the policies controlling citizenship and migration.

### **6.3 Collinearity**

The results from the Spearman's correlation matrix reveal significant correlations not only between the hypothesised independent variables and the dependent variable, but also among the independent variables themselves. Specifically, those above 0.7 point to possible multicollinearity problems that could compromise the validity and reliability of later regression analysis. Because there are 18 variables involved in this thesis, the matrix of correlations is large. Appendix 4 contains the matrix of correlations. There is a strong linear relationship between some independent variables, as shown by the high correlations between them, like the 0.828\*\* between the Education Index and Government Effectiveness and the 0.918\*\* between Country Image and Regime Type. These relationships suggest that these variables might not provide unique or independent information in a regression model when predicting dual citizenship policies.

Specifically, the correlation coefficient between the education index and government effectiveness is 0.828\*\*. The correlation is between one of two indicators of H2 (higher human capital) and one of two indicators of H6 (good political stability and governance). This strong correlation may reflect that higher educational levels within a country contribute to or coexist with more effective governance structures. Both could be manifestations of broader developmental processes. The correlation coefficient between the country image (as measured by global freedom scores) and regime type is 0.918\*\*. The correlation is between H4 (good country image) and H5 (regime type). The very high correlation indicates that countries perceived positively in terms of freedom and governance are often democratic, suggesting that these variables might effectively measure the same underlying concept of political openness and stability.

The correlation coefficient between country image and political stability is 0.721\*\*. The correlation is between H4 (good country image) and one of two H6 indicators (good political stability and governance). The significant overlap between a country's international perception and the stability of its governing institutions is evident in the notably high correlation between country image and political stability. This link makes sense since political stability usually results in favourable impressions of a country, which helps to define its reputation as a dependable and steady actor in world affairs. On the other hand, countries thought to be stable are probably more likely to have better freedom ratings, therefore strengthening the positive cycle between internal stability and outward impressions. The correlation coefficient between government effectiveness and regime type is 0.701\*\*. One of the two measures, H6—good political stability and governance—and H5—regime type—show this relationship. The strong correlation between government effectiveness and regime type suggests that the particular style of government—democratic, authoritarian, or otherwise—determines, to a large extent, its ability to function. For example, democracies may have greater systems of accountability and openness, which would increase their effectiveness. This link highlights the interplay between a regime's operational outcomes and its structural characteristics.

Two indicators may measure a hypothesised variable. Both indicators predominantly depict the same element or occurrence. It is possible for these two indications to exhibit collinearity. In this scenario, we only need to provide an indicator. For H2 (higher human capital), the correlation coefficient between the education index and the percentage of the population aged 65 and over is 0.816\*\*. This association may indicate a demographic trend in which civilizations with higher levels of education also see an aging population, likely due to later-life family planning among these more educated populations. About H6 (excellent political stability and governance), the correlation coefficient between political stability and government effectiveness is 0.737\*\*. This association suggests a somewhat strong correlation between political stability and effective government. Good governance can help ensure that government operations run smoothly and satisfy public expectations, preventing disturbance and instability, then stable governments are likely able to carry out programs and govern more effectively.

Multicollinearity among independent variables causes several statistical issues in regression analysis. Multicollinearity among independent variables can increase the

variance of the coefficient estimates, thereby making them unstable and untrustworthy. An increase in the coefficients' standard deviations can potentially provide wider confidence intervals and less statistically significant findings. High collinearity will suppress or amplify the statistical significance of the predictor, leading to incorrect conclusions about the relationships between the dependent variable and the other variables. Therefore, tackling multicollinearity is absolutely essential for various reasons. Reducing multicollinearity first increases estimation precision, which helps produce more exact projections of the effect of independent variables on the dependent variable. Ensuring that each independent variable contributes significantly to the regression model enhances the interpretability of the model. Third, addressing multicollinearity ensures the statistical tests remain valid, providing reliable p-values and confidence intervals that are crucial for inferential statistics.

Given the high correlations observed among certain independent variables in the study on dual citizenship policies, a strategic approach to variable selection or elimination is required. That is, the study considers dropping one of the highly correlated variables from the regression model, especially if they convey similar information about the social or economic structure of the countries in question. The study investigates the elimination of specific variables from various perspectives, including the primary emphasis, the theoretical rationale for their inclusion in the model, their association with citizenship policies, and the sample size required for analysis. Consequently, this approach will enhance the robustness and credibility of the findings from the study on factors influencing dual citizenship policies.

Between the two variables of country image and regime type, “regime type” is removed. The extremely high correlation (0.918\*\*) between country image and regime type suggests these variables might capture similar aspects of a country's political openness and global integration. Since country image as measured by global freedom scores can encompass aspects of democratic governance and also reflect international perceptions, which are essential for a country's approach to dual citizenship, it provides a more comprehensive measure. Thus, country image not only encapsulates the qualities of regime type but also extends to international relations and perception, making it a more impactful variable on dual citizenship policy. From the perspective of the correlation coefficient, the coefficient of country image is also larger than that of regime type, which indicates a stronger association of country image with dual citizenship policies. Furthermore, the sample size for the country image (193) is greater

than that for the regime type (163). This is another operational reason for choosing to keep the country's image variable.

The study removes "government effectiveness" from the two variables of "political stability" and "government effectiveness." Despite the intended measurement of governance features, the correlation between both variables (0.737\*\*) shows a notable overlap. Political stability immediately affects the possibility of consistent and coherent policy execution, which is absolutely essential for the development of complicated policies like dual citizenship. While government efficiency is a useful overall measure of governance quality, its particular influence on citizenship policies may be less direct than that of the fundamental influence of political stability. Furthermore, the H6 mechanism ensures that a stable political climate enables the balanced integration of dual citizens, thereby supporting their rights as well as the state's coherent unity. Effective governance regarding dual citizenship policies entails a state's capacity to establish, enforce, and oversee this policy in a manner that harmonises the rights and responsibilities of dual citizens while maintaining the legal and social structure of the country. Thus, political stability is a larger premise and cornerstone. Overall, retaining political stability and removing government effectiveness focus the model on the more critical aspects of governance, such as policy continuity and stability.

Nevertheless, the retained country's image and political stability continue to exhibit high correlation and collinearity problems. Given the potential overlap between country image and political stability, where each could influence perceptions and realities of the other, it may be advisable to retain only one of these variables in the model. A key variable for understanding influences on citizenship policy is country image, as measured by global freedom scores, which provides a more comprehensive view of how both internal and external players perceive the country's political environment. In terms of strength, dual citizenship policy is less significant than the linkage between country image (0.160\*) and political stability (0.043). Political stability and dual citizenship policy have quite a weak relationship.

The correlation coefficient between the education index and the percentage of the population aged 65 and above is 0.816\*\*. The study maintains the education index. The primary goal is to maintain the most theoretically relevant indicator. H2 suggests that higher human capital favours dual citizenship policies, positing dual citizenship as a strategic tool to enhance a country's human capital. Measuring numerous aspects of H2, the indicators in issue are the "population aged 65 and over as a percentage of the whole



population” and the "education index." Higher degrees of educational achievement usually correlate with stronger skills, higher economic output, and more potential to innovate—all vital traits of human capital that can attract dual citizenship policies geared towards building a competent workforce. On the other hand, the number of people aged 65 and up is an indirect indicator of human capital because it shows that laws need to be changed to make it easier for people to immigrate and have dual citizenship in order to increase the workforce and keep the economy stable. This would help lessen the social and economic effects of an ageing population.

Arguably, between these two variables, the education index provides a more direct assessment of human capital as conceptualised within the theoretical framework of this study. The knowledge and abilities of the population are essential for economic development; they immediately affect a government's strategic choice to apply dual citizenship policies aimed at attracting qualified people. The correlation coefficient between the education index (0.074) and dual citizenship policies is lower than that between the percentage of the population aged 65 and above (0.12) and dual citizenship policies. However, the study's theoretical framework should inform the choice of these indicators more than their statistical correlations alone. Thus, this study keeps the education indicator in the regression model. This choice is directly supported by the study's definition of human capital and its potential influence on citizenship policies. Thus, the study can qualitatively explore the impact of the ageing population as a contextual component that might influence policy decisions, without quantitatively examining it in the regression model to avoid collinearity issues. In conclusion, this study retains the education index for the regression analysis because it directly measures the key theoretical construct of human capital, providing a crucial understanding of the dynamics between citizenship policies and economic strategies in contemporary countries. This elimination will provide a more robust and theoretically aligned analysis of the factors influencing dual citizenship policies.

## **Conclusion**

Based on the characteristics of my dataset and the specific research goals, the dependent variable, dual citizenship policy, in this thesis is an ordinal variable. A considerable proportion of the independent variables in the study also had outliers and severely skewed distributions. The correlations between these elements and citizenship policies were examined using Spearman's rank correlation. This non-parametric statistical

measure makes no assumptions about the normal distribution of the variables. It is more resistant to extreme values and data that are not normally distributed, which is an advantage when dealing with issues related to the spread and distribution of the data.

This chapter found that, among the hypothesised factors, physical capital and country image have moderate associations with citizenship policies. Higher physical capital encourages countries to have and maintain dual citizenship policies for national economic development. Countries with good country images will see dual citizenship as a promise to be open and tolerant. A well-maintained good country image will further increase the country's soft power and help it gain more interest on the international stage. Hence, countries with good national images often have dual citizenship policies.

Other hypotheses have also received some empirical support. Higher human capital encourages countries to have dual citizenship policies. Good relations with neighbouring countries encourage dual citizenship policies. Democracies favour having dual citizenship policies. Good political stability and governance support dual citizenship policies. Countries with high emigration levels are more likely to have dual citizenship policies. Moreover, countries with colonisation experiences, whether they have been colonial powers, have been colonies, or have had both experiences, often have dual citizenship policies. Although their correlation strength is relatively weak, the direction of their relationship to the dual citizenship policy is as suggested by the hypothesis.

The meagre correlation coefficient in the correlation data rejects H7 that strong immigration supports having dual citizenship policies. This suggests that factors other than the need to maintain immigration could drive dual citizenship policies. Although the negative sign is very slight, it contradicts expectations and essentially suggests no influence. The control variable of contagion effect has a relatively strong connection to dual citizenship policies. It could be the idea of policy diffusion in geopolitical regions, where countries often follow trends set by their neighbours to maintain competitive or cooperative stances. It also reflects the idea that dual citizenship policies currently dominate the world.

The correlation matrix also indicates a strong association between some independent variables, which are the ones we believe are connected to citizenship policies. The greater correlations indicate that particular variables are, to some extent, characterising comparable qualities. This phenomenon is called collinearity in statistics. If all of the variables combined in the upcoming regressions influence the policy,

analysing them will result in an erroneous effect. Thus, we must remove one of them because they are too highly linked. And the study can investigate each of the two hypothesised variables independently in a later qualitative study. The study excludes the variables of population aged 65 and over (% of total population), regime type, political stability and government effectiveness, primarily based on the research objective and adherence to the theoretical framework. The study also took into account the strength of the correlation and the amount of data available for certain variables. By addressing the issue of collinearity, the results of subsequent regression analyses will have greater robustness and credibility.

## **CHAPTER 7**

### **MULTIVARIATE ANALYSIS OF ECONOMIC, POLITICAL AND CULTURAL IMPACTS**

The next step of the statistical analysis is regression. The study's progression from correlation analysis to regression analysis is both logical and necessary to further refine and validate the relationships between the hypothesised variables and countries' citizenship policies. Although correlation analysis offers first hints about possible relationships between variables, it does not consider any confounding elements or suggest causality. Conversely, regression analysis lets one include control variables, which helps to separate the effect of every independent variable on the dependent variable.

In this study, this is especially crucial since other factors, including religious diversity or international human rights treaty ratification, could affect the interaction between elements including human capital, physical capital, and citizenship policies. Moreover, regression analysis offers the chance to define a model more precisely than straightforward correlations that represent theoretical predictions. Regression analysis allows for the examination of the individual effects of several predictors, while maintaining other parameters constant. This is consistent with the hypotheses put forward in the theoretical framework, each suggesting a different influence on the probability of a country implementing dual citizenship policy. One of the main advantages of regression analysis is the ability to investigate these effects simultaneously.

Section 7.1 evaluates the two models' goodness of fit. Section 7.2 analyses the impact of the hypothesised factors on the citizenship policies. Section 7.3 continues to analyse the impact of the hypothesised factors on citizenship policies, but it also includes control variables in order to obtain more robust results.

#### **7.1 Goodness-of-Fit Evaluation**

When performing ordinal logistic regression, this study compares two models: one that includes only the hypothesised factors (Model 1, as shown in Table 7.1), and another that includes both the hypothesised factors and control variables (Model 2, as shown in Table 7.2). Due to the multicollinearity issues, this study has already excluded certain

variables from the regression analysis, including the percentage of the population aged 65 and above, regime type, political stability, and government effectiveness. This was a prudent decision. This would be wise. By removing these variables (or indicators), this study enhances the precision of the estimates for the remaining variables, thus obtaining a more robust and interpretable model.

The -2 Log Likelihood (-2LL) values for Model 1 (hypothesised factors) are 257.969, while those for Model 2 (hypothesised factors and control variables) are 226.642. The smaller the model 2's -2LL, the more precise the fit. This suggests that adding control variables to the model produces a more robust and trustworthy analysis. McFadden's  $R^2$  is a pseudo-R-squared metric that spans from 0 to 1, with higher values suggesting greater fit. The McFadden's  $R^2$  of Model 1 is 0.059. The McFadden's  $R^2$  of Model 2 is 0.167. The higher McFadden's  $R^2$  of Model 2 indicates that Model 2 explains a greater proportion of the variance in the outcome variable. Like McFadden's  $R^2$ , Cox and Snell's  $R^2$  is also bounded between 0 and 1, though it usually does not reach 1. The Cox and Snell's  $R^2$  of Model 1 is 0.102. The Cox and Snell's  $R^2$  of Model 2 is 0.261. Model 2's higher values suggest a better model fit. Nagelkerke's  $R^2$  is a modification of Cox and Snell's  $R^2$ , which adjusts the range of values from 0 to 1. This facilitates the interpretation of the results. Values closer to 1 indicate a better fit. Model 2 has a superior fit, as evidenced by its higher Nagelkerke's  $R^2$ , namely 0.312, in comparison to Model 1, which has a Nagelkerke's  $R^2$  of 0.121. The thesis also checks the model Chi-Square. A higher chi-square statistic indicates that the model provides a significantly better fit to the data compared to the null model (intercept-only model). Model 2 (45.305) also has a better fit than Model 1 (16.162). Model 2's associated p-value is 0.021, which is below the significance level (0.05) to confirm that the improvement is statistically significant, whereas Model 1's p-value is 0.135. In summary, Model 2 has a better fit than Model 1 after including the control variables.

## **7.2 Impact of Hypothesised Factors on Citizenship Policy**

Indicators such as foreign direct investment (FDI) net inflows as a percentage of GDP and gross domestic product (GDP) show a favourable connection between dual citizenship policies and a higher degree of physical capital within a country. H1 is based on the theoretical mechanism by which dual citizenship policies can attract individuals with physical capital, including machines, technology, and financial resources, which can facilitate economic development. First hints on the relationship have come from

the correlation coefficients between the dual citizenship policy and the indices of physical capital. The correlation coefficient between FDI net inflows (% of GDP) and dual citizenship policy is reported as 0.166\*, indicating a weak positive link that is statistically significant at traditional levels. By comparison, the correlation coefficient between GDP and dual citizenship policy is -0.506, indicating a weak and negative link devoid of statistical significance. These first results imply that although dual citizenship policies has a weak positive association with FDI net inflows, GDP shows no appreciable correlation with such policies. However, correlation alone cannot establish causality or clarify ambiguous elements, necessitating a more robust regression analysis.

**Table 7.1: Ordinal Logistic Regression – Model 1**

	Estimate	95% Confidence Interval	
		Lower Bound	Upper Bound
<b>Physical Capital</b>			
FDI net inflows (% of GDP)	0.014 (0.017)	-0.019	0.047
GDP	-1.25E-14 (7.94E-14 <sup>14</sup> )	<sup>13</sup> -1.68E-13 <sup>15</sup>	1.43E-13 <sup>16</sup>
<b>Human Capital</b>			
Country Image	0.015 (0.009)	-0.003	0.032
Immigration Levels	-0.024 (0.017)	-0.057	0.01
Emigration Levels	-0.005 (0.019)	-0.042	0.032
[RelationswithNeighbours=1]	-0.58 (1.011)	-2.561	1.402
[RelationswithNeighbours=2]	-0.613 (0.935)	-2.445	1.219
[RelationswithNeighbours=3]	-0.691 (0.917)	-2.489	1.106
[RelationswithNeighbours=4]	-1.352 (1.15)	-3.605	0.902
[RelationswithNeighbours=5]	0 <sub>a</sub>	.	.
[ColonisationExperience=0]	-0.646 (0.38)	-1.392	0.1
[ColonisationExperience=1]	0 <sub>a</sub>	.	.
N	151		
<b>Pseudo R2</b>			
Cox and Snell	0.102		
Nagelkerke	0.121		
McFadden	0.059		
-2 Log likelihood	257.969		

Link function: Logit.

a This parameter is set to zero because it is redundant.

Notes: Standard errors in parentheses

\*\* p < 0.01; \* p < 0.05

We conducted an ordinal logistic regression to further evaluate the relationship between physical capital and dual citizenship policy. Dual citizenship policy is the dependent variable; GDP and FDI net inflows percent of GDP are the independent variables; both of these indicators help to gauge the independent variable of physical capital. Although

<sup>13</sup> -0.00000000000001254

<sup>14</sup> 0.00000000000007944

<sup>15</sup> -0.0000000000001682

<sup>16</sup> 0.0000000000001432

the correlation of FDI net inflows (% of GDP) is not statistically significant ( $p = 0.412$ ), the coefficient of 0.014 suggests a modestly positive relationship between FDI net inflows (% of GDP) and dual citizenship policies. To interpret in terms of odds, we exponentiate the coefficient: Odds ratio (OR) =  $e^{0.014} \approx 1.014$ . This means that for every one percentage point increase in FDI net inflows (% of GDP), a country's chances of implementing a more inclusive (dual) citizenship policy rise by about 1.014. In other words, the odds increase by approximately 1.4%. This estimate has a p-value of 0.412, which is considerably higher than the conventional threshold of 0.05 for statistical significance. This suggests that there is insufficient data to support the conclusion that FDI net inflows (% of GDP) has a significant relationship with having dual citizenship policies. The 95% confidence interval (-0.019 to 0.047) includes zero, further confirming that the effect is not statistically significant.

Overall, the regression analysis shows that there is some evidence that FDI net inflows have a positive effect on dual citizenship policies, but this relationship is not statistically strong enough. The analysis reveals the intricate nature of citizenship policy in practice. Furthermore, the findings suggest that FDI net inflows (% of GDP) do not represent the primary driving force behind the formulation of dual citizenship policy.

The very near-zero coefficient for GDP suggests that there is almost no association between dual citizenship policies. The confidence interval, which spans zero, further implies no significant link; the p-value of 0.875 verifies that this relationship is not statistically significant. The negative sign of the GDP coefficient could be due to the fact that economically developed countries typically have higher employment prospects. These opportunities may attract and retain qualified workers without necessarily providing dual citizenship. The domestic labour market may be appealing enough to support high-skilled immigration or to retain local talent, thereby lessening the need for policies specifically targeted at luring dual citizens (Mazzolari, 2009). Furthermore, economically strong countries could be less motivated by the necessity to draw foreign direct investment (FDI), which usually goes along with immigrant populations comprising dual citizens, and more financially self-sufficient. This economic power could result in more conservative ideas of citizenship, emphasising preserving the status quo rather than aggressively recruiting new citizens from overseas (Abbas et al., 2021).

There might be a reverse causality between GDP levels and dual citizenship policies. As dual citizens can bring more physical capital, which therefore can boost the national economy, countries with dual citizenship policies should have a high GDP.



In this sense, countries with dual citizenship policies should have a high correlation with GDP, indicating a boost to the national economy. However, the correlation between dual citizenship policies and GDP is minuscule (-0.046) and does not align with the hypothesised direction. This suggests that GDP, as a general economic indicator, cannot directly influence the complexity of citizenship policy decisions.

Overall, the evidence supporting H1 is quite limited. Thus, we can view dual citizenship as a strategic element of a broader economic policy aimed at attracting foreign capital and knowledge. The statistically significant positive relationship between dual citizenship policy and FDI net inflows (% of GDP) demonstrates this. Though the effect size is tiny, the regression analysis also shows a causal link between FDI net inflows (% of GDP) and dual citizenship policy.

H2 demonstrates that higher levels of human capital, as measured by the education index, are connected with a higher likelihood of a country implementing a dual citizenship programme. The idea is that dual citizenship policies can attract skilled workers, boosting economic growth and development in the information sector. Dual citizenship policies have a positive link, as shown by the 0.01 coefficient on the education index. To interpret this in terms of odds, we exponentiate the coefficient: Odds ratio =  $e^{0.01} \approx 1.01$ . This implies that the likelihood of a country adopting more liberal citizenship policies rises by around 1% for every unit increase in the education index. But with a p-value of 0.994, the link is not statistically significant. Moreover, the big 95% confidence interval—which spans -2.762 to 2.783—contains zero, therefore indicating uncertainty and supporting the lack of statistical relevance.

Calculated as a correlation coefficient of 0.074, the dual citizenship policy shows a positive link with the education index. This was determined by taking into account both correlation and regression. Countries will probably use dual citizenship policies to improve their human resources. Dual citizenship policy has a modest positive link, as seen by the 0.01 coefficient for the education variable in the ordinal logistic regression. Still, the somewhat high p-value (0.994) and the large confidence interval point to the lack of statistical significance in this relationship. The OR value of 1.01 also indicates a negligible effect.

Empirical data from correlation and ordinal logistic regression analyses link higher human capital to dual citizenship policies. Still, the effect of human capital on citizenship policy is rather minor. This implies that elements other than human capital likely significantly influence judgements on dual citizenship policies. The absence of

significant findings serves to highlight the complexity of policy decisions regarding dual citizenship. Future research should investigate these alternative determinants, potentially including political, social, or legal factors, in order to gain a more comprehensive understanding of the factors influencing dual citizenship policies.

According to H3, peaceful ties with neighbours help to support having dual citizenship policies. The justification is that bad ties with neighbours may cause mistrust and worries about the influence of outsiders on national identity and economic dominance, possibly fostering violence. On the other hand, peaceful interactions build confidence and collaboration, therefore motivating having dual citizenship policies. In our ordinal logistic regression study, we investigate the impact of peaceful neighbour relations on dual citizenship policy. The citizenship policy is the dependent variable; the relations with neighbours is the independent variable; higher scores indicate more hostile relations, and lower scores suggest more harmonious ties. For this analysis, the base category (relations with neighbours = 5) is set to zero as it is redundant.

The estimates for the relations with neighbours index are as follows: [RelationswithNeighbours=1]: Estimate = -0.58; [RelationswithNeighbours=2]: Estimate = -0.613; [RelationswithNeighbours=3]: Estimate = -0.691; [RelationswithNeighbours=4]: Estimate = -1.352. It seems that having better relationships with neighbours (lower index values) is linked to more likely having policies that are easier for people to have dual citizenship, compared to the control group. All of the p-values for these estimates are well above the conventional threshold of 0.05, indicating that none of these coefficients are statistically significant. This implies that the evidence does not statistically justify the link between dual citizenship policies and harmonious relations with neighbours. All 95% confidence intervals for the coefficients include 0, demonstrating a lack of statistical significance and implying that we cannot boldly assert a directional influence of peaceful relations with neighbours on dual citizenship policies.

To interpret the effect sizes, we convert the log-odds coefficients to odds ratios: [RelationswithNeighbours = 1] =  $e^{-0.58} \approx 0.56$ ; [RelationswithNeighbours = 2] =  $e^{-0.613} \approx 0.54$ ; [RelationswithNeighbours = 3] =  $e^{-0.691} \approx 0.50$ ; and [RelationswithNeighbours = 4] =  $e^{-1.352} \approx 0.26$ . These odds ratios indicate that more peaceful relations (lower index values) are associated with lower odds of restrictive dual citizenship policies relative to baseline, consistent with H3. Combining the

previous correlation analysis, the coefficient is also consistent with the regression analysis. The correlation coefficient of -0.059 suggests a slightly negative relationship between aggressive relations with neighbours and having a dual citizenship policy. This means that as relations become more contentious, the propensity to have a liberal citizenship policy decreases slightly, although the p-value of 0.459 for this correlation coefficient indicates that this relationship is not statistically significant.

The outcomes of our ordinal logistic regression analysis and correlation ultimately support H3. The theory aligns with the direction of the coefficients and odds ratios, suggesting that a greater probability of implementing more tolerant and inclusive citizenship policy is associated with more peaceful interactions with neighbors. However, the results do not robustly support this relationship, as evidenced by high p-values and confidence intervals that include zero.

H4 proposes that a good country's image encourages the implementation and maintenance of dual citizenship policies. The justification is that countries with positive country images are more likely to implement such measures in order to present an image of tolerance, openness, and multiculturalism that strengthens their soft power and worldwide reputation. On the Global Freedom Scores, the coefficient is 0.015. This coefficient in the framework of ordinal logistic regression shows the change in the log odds of a higher degree of dual citizenship policy for a unit rise in the Global Freedom Score. The positive coefficient of 0.015 shows that, as the Global Freedom Scores climb, the probability of implementing a more inclusive and tolerant citizenship policy—that is, a dual citizenship policy—also rises, therefore reflecting a better country image. Still, the degree of this influence is actually rather small. To provide a more intuitive understanding, we exponentiate the coefficient to obtain the odds ratio:  $OR = e^{0.015} \approx 1.015$ .

An OR of 1.015 indicates that for each one-unit increase in the Global Freedom Scores, the chances of a country adopting a higher level of dual citizenship policy increase by approximately 1.5%. The p-value for the coefficient is 0.101, which is slightly above the conventional threshold of 0.05 for statistical significance. The evidence indicates a positive correlation between a more tolerant and inclusive citizenship policy and a positive country image, but the data does not support a statistically significant association at the 5% level. The 95% confidence interval covering the coefficient runs from -0.003 to 0.032. This interval includes 0; therefore, it suggests even more that the effect is not statistically significant.

Combining the previous correlation analysis, we found a correlation coefficient of 0.160\*, with a p-value of 0.027, between the country image (as measured by the Global Freedom Scores) and dual citizenship policy. The study found a statistically significant and positive connection, meaning that countries with higher global freedom scores have more liberal citizenship policies. Meanwhile, statistical significance at the 0.05 level indicates that this correlation is reliable. The strong positive link between a good country's image and its dual citizenship policies supports H4 at the bivariate level.

This shows that countries with higher global freedom scores have more inclusive citizenship policies. This conclusion supports the theoretical anticipation that countries with positive images will have dual citizenship policies that reflect their openness and tolerance. At the multivariate level, the regression analysis corroborates the findings of the previous correlation analysis, although it also reveals some nuances. The positive coefficient of 0.015 indicates that countries with higher freedom scores are more likely to have dual citizenship policies. This supports the argument that countries use dual citizenship policy to project an image of inclusivity and multiculturalism. The OR of 1.015 implies a tiny but positive effect, with each unit increase in Global Freedom Scores increasing the likelihood of having inclusive citizenship policies. The p-value of 0.101 and the confidence interval, which includes zero, indicate that the association is not statistically significant at the 5% level. This suggests that, while there is some evidence of a positive relationship, it is insufficient to prove H4 definitively.

Overall, the evidence supports H4 somewhat, but policymakers should keep in mind that it is not definitive. Although a country's desire to provide a good image may certainly affect dual citizenship policies, other elements, including political, social, and financial ones, also have an effect. Future studies should investigate these additional elements and consider longitudinal studies to examine how changes in a country's image over time may impact the implementation of dual citizenship policy. In addition, including qualitative case studies in the scope of research could provide detailed insights.

H7 claims that high immigration levels promote dual citizenship regimes. The rationale is that in countries with high immigration rates, immigrants make major contributions to the population, labour force, and intellectual production. Countries may want to keep these immigrants as permanent residents in order to reap the benefits. The coefficient for immigrants—that is, the percentage of the overall population—is -0.024. Following the rules of ordinal logistic regression, this coefficient shows how the

log-odds of falling into a more tolerant and inclusive citizenship policy change when the immigrants as a percentage of the total population goes up by one unit. The negative coefficient of -0.024 shows that the probability of establishing a more tolerant or inclusive (dual) citizenship policy declines as the proportion of immigrants rises. Still, this is a small influence.

To provide a more intuitive understanding, let us exponentiate the coefficient to obtain the odds ratio:  $OR = e^{-0.024} \approx 0.976$ . An OR of 0.976 indicates that for each one-unit increase in the percentage of immigrants, the odds of a country adopting a higher level of dual citizenship policy decrease by approximately 2.4%. The coefficient's p-value is 0.169, surpassing the established 0.05 level of statistical significance. This implies that there is not a statistically significant link between the percentage of immigrants and the probability of having a more inclusive (dual) citizenship policy. The 95% confidence interval covering the coefficient runs from -0.057 to 0.010. This interval includes 0; therefore, it suggests even more that the effect is not statistically significant.

The empirical evidence from both ordinal logistic regression analysis and correlation does not support the hypothesis that high levels of immigration encourage dual citizenship policies. Specifically, the negative coefficient of -0.024 indicates a negative correlation between increased immigration and a decreased likelihood of more tolerant citizenship policies. This evidence contradicts the H7. With rising immigration levels, the OR of 0.976 shows a minor decline in the likelihood of having more inclusive citizenship policies. In addition, the prior correlation of -0.003 suggests a negative and weak association between immigration levels and dual citizenship policies. These findings show that a country's decision to have dual citizenship policies is not significantly influenced by immigration levels.

H8 suggests that high levels of emigration encourage dual citizenship policies. Countries with high levels of emigration adopt dual citizenship policies to attract foreigners who can substitute for those who have left the country and encourage nationals living abroad to return. The coefficient for emigrants (as a percentage of the overall population) is 0.005. In ordinal logistic regression, this coefficient shows how the log-odds of being in a more tolerant and inclusive citizenship policy change when the percentage of people leaving the country goes up by one unit. The negative coefficient of -0.005 shows that the probability of using a more tolerant citizenship policy decreases as the percentage of emigrants rises. However, the effect is quite minor.

To provide a more intuitive understanding, we exponentiate the coefficient to obtain the odds ratio:  $OR = e^{-0.005} \approx 0.995$ . With an OR of 0.995, a country's chances of adopting a more flexible citizenship policy—such as dual citizenship—drop by almost 0.5% for every unit increase in the emigrants as a percentage of the total population. The coefficient has a p-value of 0.796, significantly surpassing the established statistical significance threshold of 0.05. This implies that there is not a statistically significant link between the percentage of emigrants and the chance of having a more inclusive citizenship policy, such as dual citizenship policy. The 95% confidence interval covering the coefficient runs from -0.042 to 0.032. This interval includes 0; therefore, it suggests even more that the effect is not statistically significant.

The empirical evidence from the ordinal logistic regression analysis refutes H8 that high levels of emigration favour having a dual citizenship policy. More specifically, the negative coefficient of -0.005 points to a modest inverse association, in which a lower likelihood of dual citizenship policies corresponds with higher degrees of emigration. This finding is contrary to H8. The OR of 0.995 indicates a very small decrease in the odds of having more tolerant and inclusive citizenship policies (like dual citizenship policies) with increasing emigration levels. However, combined with the discovery of correlations, the correlation coefficient of 0.13 between emigration levels and dual citizenship policies, although weak, indicates a positive relationship between emigration levels and dual citizenship policies. The p-value of 0.069 indicates that this relationship is marginally significant, implying a possible association that deserves further investigation.

Correlation measures the strength and direction of a linear relationship between two variables, but it does not account for other variables, which is why the regression and correlation analyses yielded different results. In contrast, ordinal logistic regression controls for other variables in the model and provides a more nuanced understanding of the relationship. The regression model's specification and the inclusion of other variables or factors could influence the results, potentially leading to different interpretations. Furthermore, the regression analysis shows that emigration has a very modest and statistically negligible effect on dual citizenship policy, implying that other factors may play a larger role. The correlation analysis reveals a weak but marginally significant positive connection, suggesting an unregulated or indirect influence. The regression and correlation studies' mixed results weakly support the hypothesis that high levels of emigration favour having dual citizenship policies.

Overall, H8 has conflicting support from correlation and ordinal logistic regression. This association is not strong, but the weak positive correlation and marginal significance imply that emigration levels may have a minor positive influence on dual citizenship policy. Higher emigration levels do not favour more inclusive citizenship policies, as indicated by the negative and statistically negligible coefficient in the regression. The absence of statistical significance in the regression analysis implies that the recorded association is not strong enough to provide clear results. Both the correlation and regression studies show a minimal effect size, suggesting that emigration numbers cannot significantly influence the likelihood of adopting a dual citizenship policy.

H9 suggests that countries with a history of colonisation are more likely to adopt dual citizenship policies. The rationale is that dual citizenship policies facilitate mobility and links between colonial powers and their former colonies, thereby benefiting economic and social ties. The negative coefficient (-0.646) implies that countries without a history of colonisation are less likely to have more tolerant citizenship policies than those with a history of colonization. With a p-value of 0.09, this coefficient somewhat exceeds the accepted statistical significance threshold of 0.05. This suggests that although dual citizenship policies and colonisation experience show some evidence of a link, it is not sufficient to reject the null hypothesis at the 5% significance level. The 95% confidence interval for the coefficient runs from -1.392 to 0.1. This interval equals 0, so it also shows that at the 5% level, the influence of colonisation experience on dual citizenship policy is not statistically significant. However, the lower bound exhibits a slight negative trend, and the interval's top range approaches zero, suggesting that sample size or variability could potentially contribute to an influence that may not fully manifest.

To interpret the effect size more intuitively, we convert the log-odds coefficient into an odds ratio. The OR is calculated as  $e^{-0.646} \approx 0.524$ , approximately. This implies that the chances of implementing a more permissive dual citizenship policy for countries devoid of a colonisation past are roughly 0.525 times greater than those with such a background. This decrease in chances, consistent with the negative direction of the coefficient, indicates that colonisation experience does indeed help to support having dual citizenship policies. The correlation analysis reveals a positive correlation coefficient (0.107) between dual citizenship policies and countries that have experienced colonisation in the past. Despite its small magnitude, there is a positive

correlation between colonisation experience and dual citizenship policies. Whether one is the coloniser or the colonised, the empirical findings from correlation and ordinal logistic regression analysis corroborate H9 that colonisation experience promotes having dual citizenship policies. Proposed systems include colonists' ease of keeping ties to their former colonial country and the financial gains of granting expatriates dual citizenship.

It should be underlined that the lack of statistical significance ( $p$ -value = 0.09 and confidence interval includes zero) advises care in reaching firm decisions. Although the data points to a possible link, it is not strong enough to definitely support H9. The coefficient and odds ratio support the hypothesis, indicating that countries with a history of colonisation are more likely to have permissive dual citizenship policy. However, given the low level of significance and the confidence interval near zero, the hypothesis may only be regarded cautiously supported. Future research could build on these findings by include qualitative case studies that provide more in-depth insights into the motivations driving these policy decisions in both colonised and non-colonised countries.

### *Conclusion*

H1, H2, H3, H4, and H9 are supported by the regression analysis Model 1. Foreign Direct Investment net inflows (% of GDP) positively influence dual citizenship policies (H1). Higher human capital is associated with having dual citizenship policies (H2). A dual citizenship strategy is a strategic one utilised by a country to draw additional human and physical resources, which can subsequently be applied for national development. Furthermore, influencing dual citizenship policies (H4) is the picture of a country. Positive country image countries are more likely to apply inclusive and tolerant policies in order to present an image of tolerance, openness and multiculturalism, therefore increasing their soft power and worldwide position. Nevertheless, the impact of physical capital, human capital, and country image in influencing a country to adopt a dual citizenship policy is very small. This also illustrates the complexity of citizenship policy. There are many factors to consider when a country adopts a particular type of citizenship policy. Physical capital, human capital and country image are not the primary driving forces behind the formulation of dual citizenship policies. Although H1 and H2 mainly suggest economic incentives for



countries to adopt dual citizenship policies, GDP as a broad economic measure does not directly influence the complexity of citizenship policy decisions.

The relationship between relations with neighbours and citizenship policies is of medium strength, as is the relationship between colonisation experiences and citizenship policies. The establishment of friendly relations with neighbouring countries is conducive to the implementation of dual citizenship policies (H3). A history of colonisation, whether as a coloniser or a colonised country, is associated with having dual citizenship policies (H9). It is also noteworthy that a considerable number of the coefficients are statistically insignificant. The lack of statistical significance of many coefficients may be attributed to the relatively small effect sizes, which may not reach statistical significance despite the large sample size. This indicates that, although there may be a relationship, it is so slight that it would not result in statistically significant findings. Moreover, given that the dataset for this thesis encompasses all countries<sup>17</sup>, the concept of statistical significance becomes less relevant. In this case, the focus should be on descriptive statistics rather than inferential statistics. Given that sampling error is negligible when considering the entire population (all countries), parameters can be estimated with high precision, and there is no problem of generalisation (which is addressed by significance testing).

The empirical evidence does not support the theory that strong immigration levels support the execution of dual citizenship policies (H7). The results show that a country's choice to embrace a tolerant citizenship policy or not is not much influenced by immigration level. H8 is supported by the correlation and ordinal logistic regression to a limited extent. The regression analysis indicates a very small and statistically insignificant effect of emigration on dual citizenship policy. This suggests that other factors may play a more critical role. The correlation analysis indicates a weak but marginally significant positive relationship, which may be indicative of an uncontrolled or indirect effect. The evidence suggests that emigration levels do not have a significant impact on the likelihood of adopting a dual citizenship policy.

### **7.3 Impact of Hypothesised and Control Variables on Citizenship Policy**

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<sup>17</sup> The total number of countries in the world is 195, with 150 (available) countries remaining after listwise deletion.

Model 2 incorporates both the hypothesised factors and the control variables. The regression results are presented in Table 7.2 below.

**Table 7.2: Ordinal Logistic Regression – Model 2**

	Estimate	95% Confidence Interval	
		Lower Bound	Upper Bound
<b>Physical Capital</b>			
FDI net inflows (% of GDP)	0.029 (0.033)	-0.035	0.093
GDP	-6.30E-14 <sup>18</sup> (1.26E-13 <sup>19</sup> )	-3.10E-13 <sup>20</sup>	1.84E-13 <sup>21</sup>
Human Capital	-0.556 (1.656)	-3.802	2.689
Country Image	0.022* (0.011)	0	0.044
Immigration Levels	-0.022 (0.02)	-0.06	0.017
Emigration Levels	-0.01 (0.022)	-0.054	0.033
Territory Size	2.07E-07 (1.55E-07)	-9.62E-08	5.10E-07
Religious Diversity	-0.165 (0.102)	-0.365	0.035
[RelationswithNeighbours=1]	-1.136 (1.188)	-3.465	1.192
[RelationswithNeighbours=2]	-1.218 (1.075)	-3.324	0.889
[RelationswithNeighbours=3]	-1.183 (1.041)	-3.223	0.858
[RelationswithNeighbours=4]	-2.352 (1.319)	-4.938	0.233
[RelationswithNeighbours=5]	0a	.	.
[ColonisationExperience=0]	-0.861 (0.439)	-1.721	0
[ColonisationExperience=1]	0a	.	.
[ContagionEffect=0]	-1.376** (0.418)	-2.196	-0.556
[ContagionEffect=1]	0a	.	.
[Ratificationof18InternationalHumanRightsTreaties=4]	-38.176 (0)	-38.176	-38.176
[Ratificationof18InternationalHumanRightsTreaties=5]	-19.989 (5964.707)	-11710.6	11670.622
[Ratificationof18InternationalHumanRightsTreaties=6]	-20.055 (5964.707)	-	11670.556
[Ratificationof18InternationalHumanRightsTreaties=8]	-19.407 (5964.707)	-	11671.204
[Ratificationof18InternationalHumanRightsTreaties=9]	-18.454 (5964.707)	-	11672.157
[Ratificationof18InternationalHumanRightsTreaties=10]	-18.926 (5964.707)	-	11671.685
[Ratificationof18InternationalHumanRightsTreaties=11]	-19.017 (5964.707)	-	11671.594

<sup>18</sup> -0.00000000000006302

<sup>19</sup> 0.0000000000001262

<sup>20</sup> -0.0000000000003104

<sup>21</sup> 0.0000000000001844

[Ratificationof18InternationalHumanRightsTreaties=12]	-18.29 (5964.707)	-	11672.321
		11708.901	
[Ratificationof18InternationalHumanRightsTreaties=13]	-18.738 (5964.707)	-	11671.873
		11709.349	
[Ratificationof18InternationalHumanRightsTreaties=14]	-18.401 (5964.707)	-	11672.21
		11709.012	
[Ratificationof18InternationalHumanRightsTreaties=15]	-18.582 (5964.707)	-	11672.029
		11709.193	
[Ratificationof18InternationalHumanRightsTreaties=16]	-18.825 (5964.707)	-	11671.787
		11709.436	
[Ratificationof18InternationalHumanRightsTreaties=17]	-18.642 (5964.707)	-	11671.97
		11709.253	
[Ratificationof18InternationalHumanRightsTreaties=18]	0a	.	.
[MultipartySystem=0]	1.039 (0.747)	-0.425	2.504
[MultipartySystem=1]	0a	.	.
<hr/>			
N	150		
Pseudo R2			
Cox and Snell	0.261		
Nagelkerke	0.312		
McFadden	0.167		
-2 Log likelihood	226.642		

Link function: Logit.

a This parameter is set to zero because it is redundant.

Notes: Standard errors in parentheses

\*\* p < 0.01; \* p < 0.05

The conclusion regarding H1 remains largely unchanged when the control variables are taken into account. In Model 2, the estimated coefficient for FDI increases to 0.029 with a standard error of 0.033 and a p-value of 0.379. The 95% confidence interval in this model spans from -0.035 to 0.093. The coefficient for GDP is slightly more negative at -0.00000000000006302 with a standard error of 0.0000000000001262 and a p-value of 0.618. The 95% confidence interval extends from -0.00000000000003104 to 0.0000000000001844. The odds ratio (OR) can be derived by exponentiating the coefficients: Foreign Direct Investment (FDI), Net Inflows (% of GDP):  $e^{0.029} \approx 1.029$ ; GDP (Current US\$):  $e^{-0.00000000000006302} \approx 1$

In both models, the coefficients for FDI are positive (0.014 and 0.029, respectively), implying a positive relationship with the chance of implementing a dual citizenship policy. However, the p-values (0.412 in Model 1 and 0.379 in Model 2) show that this connection is not statistically significant. Furthermore, both models' confidence intervals contain 0, indicating a lack of statistical significance. The GDP coefficients in both models are negative (-0.00000000000001254 in Model 1 and -0.00000000000006302 in Model 2), indicating a very weak negative correlation with dual citizenship policies. GDP has a small influence, as does Model 1. These

coefficients are exceedingly small and not statistically significant, as seen by their high p-values (0.875 in Model 1 and 0.618 in Model 2) and confidence intervals that contain zero. Finally, data suggests that FDI net inflows may have a positive impact on dual citizenship policies. However, the effect is fairly minimal. GDP has little direct influence on the complexities of citizenship policies. This implies that factors other than physical capital will have a bigger impact on dual citizenship policy decisions.

The coefficient of 0.01 for Model 1 suggests that a one-unit rise in the Education Index produces a quite small change in the log-odds of a country implementing dual citizenship policies. Still, this effect is not statistically significant considering the large confidence range and the standard error of 1.415. In Model 2, the negative coefficient (-0.556) implies that a one-unit rise in the Education Index would result in a drop in the log-odds of a country embracing a dual citizenship policy. Comparably, the high p-value (0.737) and the broad confidence interval point to this finding not being statistically significant. The odds ratio can be derived by exponentiating the coefficients. For Model 1:  $e^{0.01} \approx 1.01$ . For Model 2:  $e^{-0.556} \approx 0.573$ .

Including control variables in Model 2 helps to explain the different orientations of the link between the Education Index (human capital) and dual citizenship policy seen in Models 1 and 2. Model 1 only includes the hypothesised elements and lacks any control variables. When unobserved variables link the Education Index to dual citizenship policies, hidden variable bias can result. The positive coefficient of Model 1 could suggest not just the direct influence of human capital but also the presence of these omitted factors. Including control variables in Model 2 helps to explain the noted variations in the direction of the Education Index coefficient by accounting for more variability in the dependent variable. The negative coefficient in Model 2 indicates that, after controlling for these other factors, higher human capital might be associated with a decreased likelihood of adopting dual citizenship policies. This suggests that the interaction of these contradictory components could have explained the apparent positive connection in Model 1.

The modest coefficients in both models show a limited influence of human capital on dual citizenship policies, considering the standard errors and confidence intervals. The direction of the correlation suggests that the impact is not very great. The difference in coefficient directions between the two models further undermines the hypothesis. The overall empirical data does not support H2, which suggests that having a dual citizenship policy promotes more human capital. Both models' outcomes reveal that the

link is not statistically significant and that the impact sizes are meagre. The addition of control factors alters the relationship's direction, implying that any apparent relationship in Model 1 might be the result of unaccounted-for variable bias. Given these findings, H2 was rejected based on the current data and models.

H3 is about the relations with neighbours. The estimate in ordinal logistic regression shows the log odds of the dependent variable (dual citizenship policy) for different levels of the independent variable (relations with neighbours index) compared to a starting point (relations with neighbours = 5). While not statistically significant, the negative coefficients for Relations with Neighbours categories 1–4 in Model 1 indicate that the likelihood of implementing a dual citizenship policy rises as the Relations with Neighbours Index falls—that is, from 5 to 1. The inclusion of control variables in Model 2 raises the negative coefficients. The ORs can be derived by exponentiating the coefficients: for RelationswithNeighbours=1:  $e^{-1.136} \approx 0.32$ ; for RelationswithNeighbours=2:  $e^{-1.218} \approx 0.30$ ; for RelationswithNeighbours=3:  $e^{-1.183} \approx 0.31$ ; for RelationswithNeighbours=4:  $e^{-2.352} \approx 0.10$ . The consistent negative coefficients across different categories of the Relations with Neighbours Index provide support for the hypothesised direction. Consistent negative coefficients throughout the several categories of the Relations with Neighbours Index show both models, which fit the hypothesis of consistency. Good relationships with neighbours support a dual citizenship strategy. Nevertheless, the absence of statistical relevance in this link compromises the case for a strong correlation.

With regard to the impact of the country's image on the dual citizenship policy (H4), the coefficient of 0.022 in Model 2 indicates that a one-unit increase in the Global Freedom Score is associated with a 0.022 increase in the log-odds of adopting a dual citizenship policy. When control variables are considered, the coefficient becomes statistically significant ( $p = 0.047$ ), indicating a meaningful link. The OR is approximately equal to  $e^{0.022} \approx 1.022$ . This means that for every one-unit increase in the Global Freedom Score, the likelihood of implementing a dual citizenship policy rises by 2.2 percent. The outcome is statistically significant. Both models have rather minor impact sizes; the odds ratios indicate a little increase in the likelihood of enacting dual citizenship policy in countries with higher global freedom scores. Though the effect magnitude is relatively small, the statistical significance discovered in Model 2 provides a strong argument in favour of the H4. The consistency of positive coefficients

in both models supports the idea. The rise in statistical significance from Model 1 to Model 2 suggests that the relationship between country image and dual citizenship policies is clear through extra factor control. Countries with better Global Freedom Scores—indicative of a good national image—are more likely to enact dual citizenship laws. This supports H4 that countries respond to their image of tolerance, openness and multiculturalism through the implementation of dual citizenship policies and then enhance their soft power and global posture.

In Model 2, a -0.227 coefficient for immigration levels (H7) shows that the log probabilities of having a dual citizenship policy go down by 0.222 for every one-unit rise in the percentage of immigrants in the total population. The statistical significance of this coefficient ( $p = 0.265$ ) indicates that the relationship remains insignificant even with the inclusion of control variables. The OR is  $e^{-0.022} \approx 0.978$ . This shows that for each one-unit increase in the percentage of immigrants, the odds of having a more tolerant citizenship policy decrease by approximately 2.2%. Both models exhibit modest impact sizes. The ORs reveal a slight decrease in the likelihood of a more inclusive and tolerant citizenship policy as immigration levels rise. Though the correlation is not statistically significant, the consistent existence of negative coefficients in both models suggests a negative relationship.

In summary, the findings of the ordinal logistic regression analysis do not offer enough empirical data to justify H7 that high immigration levels favour having dual citizenship policies. Although this link is not statistically significant, both models exhibit a negative relationship between immigration numbers and dual citizenship policies. Different factors might be more crucial in deciding if a country chooses to implement such strategies.

In terms of emigration levels (H8), Model 2 has a coefficient of -0.01 on the emigration levels, with a standard error of 0.222. These coefficients illustrate the log probability of a country selecting a more inclusive dual citizenship policy for a unit increase in the percentage of emigrants relative to the overall population. The ORs are calculated by exponentiating the coefficient. For model 1,  $e^{-0.005} \approx 0.995$ , and for model 2,  $e^{-0.01} \approx 0.990$ . These ORs show that, in Model 1 and Model 2, the probabilities of a country choosing a more expansive dual citizenship policy drop by roughly 0.5% for every one percentage point increase in the emigrant population. The p-values linked to the emigrant variable in both models are much higher than the

accepted statistical significance (0.796 in Model 1 and 0.643 in Model 2), indicating that the observed coefficients are not significantly different from zero. Furthermore, the 95% confidence ranges for the coefficients in both models (Model 1: -0.042 to 0.032; Model 2: -0.054 to 0.033), including zero, further underline the lack of statistical significance.

High emigration raises the possibility that, under H8, countries have dual citizenship policies. This does not support the empirical findings of ordinal logistic analysis. Although the link is not statistically significant, the negative coefficients suggest an opposite relationship with the hypothesis, therefore contradicting H8. Strong p-values and great confidence intervals lend support to the conclusion that emigration numbers do not clearly influence a country's likelihood of having a dual citizenship policy.

Model 2's coefficient for [Colonisation Experience=0]—which combines all hypothesised elements with control variables—is -0.861 with a standard error of 0.439. With a p-value of 0.050047 for this coefficient, the statistical significance is close to the 0.05 level. With a major negative impact at the bottom bound, the 95% confidence interval for this coefficient runs from -1.721 to 0. The OR for [ColonisationExperience=0] in Model 2 is:  $e^{-0.861} \approx 0.423$ . This suggests that, after other considerations, countries without colonisation experience are around 0.423 times as likely to have a dual citizenship policy as those with colonisation experience.

Supported by Koebner (2017), Paynter (2017), Fiore (2018), and Sai (2019), H9 contends that countries with colonisation pasts are more inclined to have dual citizenship policy for economic, social, and historical reasons. Model 2's results show better empirical evidence for H9 than Model 1's. The negative and nearly statistically significant coefficient for [ColonisationExperience=0] in Model 2 indicates that countries without colonisation experiences are much less likely than those with such experiences to have dual citizenship policies. This aligns with the proposed mechanism: dual citizenship policies facilitate mobility and economic ties between former colonies and colonial powers, thereby reinforcing historical institutional patterns. Model 1's results, while not statistically significant, do not contradict the hypothesis but rather indicate a trend in the expected direction, suggesting that further research with additional control variables might yield more robust results.

The ordinal logistic regression results—especially from Model 2—show empirical evidence for the hypothesis that colonisation experience is linked with having dual

citizenship policies. Countries with past colonisation—either as colonisers or colonised—are more likely to have dual citizenship policies. This finding is consistent with the theoretical framework that historical institutionalism plays a role in shaping contemporary policy choices. Therefore, the factor of colonisation experience is indeed associated with a country's choice of a dual citizenship policy, supporting the hypothesis presented.

Some findings about control variables also bring new inspiration for future research. The contagion effect showed a statistically significant positive association with dual citizenship policies both in the correlation analysis and in the regression analysis. In Model 2 of the ordinal logistic regression, which includes both hypothesised factors and control variables, the coefficient (estimate) for the contagion effect is -1.376 with a standard error of 0.418. With a 0.001 significance level—that is, 1% level—this finding is statistically significant. The 95% confidence interval, which excludes zero, ranges from -2.196 to -0.556 and hence reinforces the statistical importance of the coefficient. The absence of a contagion effect and the likelihood of a more permissive dual citizenship policy show a negative correlation, as indicated by the coefficient of -1.376 for [ContagionEffect=0]. As stated otherwise, the probability that a given country would have a more relaxed dual citizenship policy decreases when adjacent countries do not follow dual citizenship policies [ContagionEffect=0]. Conversely, the likelihood increases when neighbouring countries adopt dual citizenship policies [ContagionEffect=1].

The OR for the contagion effect is  $e^{-1.376} \approx 0.252$ . This suggests that, absent a contagion effect, the probability of a country adopting a more inclusive citizenship policy is practically 0.252 times smaller under all other circumstances. Alternatively, the existence of a contagion effect increases the likelihood of a country adopting a tolerant dual citizenship policy by approximately  $1/0.252 = 3.97$ . The important negative coefficient for the contagion effect, together with the related odds ratio, emphasises the need for regional dynamics in creating national dual citizenship policies. The existence of a contagion effect, whereby adjacent countries have embraced dual citizenship policies, greatly raises the possibility that a particular country will also follow such policies. This finding supports theories of policy diffusion and regional integration. It suggests that neighbours may have an effect on national policies, possibly because of issues related to regional integration, migration patterns, and political or economic integration (Hoffmann, 2019; Risse, 2016; Schmitter, 1970).



Regarding the study question, "What are the factors associated with a dual citizenship policy?" The empirical data underlines the importance of external forces, particularly those from neighbouring countries. This means that the regional policy environment has an influence on domestic policy decisions regarding dual citizenship than they do in a vacuum. Therefore, in developing dual citizenship policies, policymakers have to take into account the larger geographical background and the potential for policy diffusion. Other control factors in the given model lack a strong or consistent correlation with dual citizenship policies.

### **Conclusion**

The inclusion of both hypothesised and control variables in Model 2 provides a completer and more accurate grasp of the relationships under investigation. Most of Model 1's results hold true when taken in line with Model 2's examination.

The relations with neighbours and colonisation experience exert a relatively strong influence on a country's decision on which citizenship policy to adopt. Countries with good relations with neighbours are more likely to have dual citizenship policies. Observations show that countries that have experienced colonisation, whether as a colonising or colonised country, are more likely to implement dual citizenship policies. The empirical evidence provides directional support for H1 and H4. The study found that FDI net inflows could positively impact on having dual citizenship policies. Furthermore, countries respond to their image of tolerance, openness, and multiculturalism through the implementation of dual citizenship policies and then enhance their soft power and global posture. However, these factors' effect size is relatively small. This shows the intricacy of citizenship policy, which considers several facets. Other factors may influence a country's decision to have a particular citizenship policy.

Human capital and emigration levels do not appear to have a discernible impact on the likelihood of a country adopting a specific type of citizenship policy. GDP exerts no direct influence on the complexity of citizenship policy decisions. Furthermore, there is insufficient empirical evidence to support the hypothesis that high levels of immigration encourage having dual citizenship policies.

Findings about control variables bring new inspiration for future research. The statistical analysis of the contagion effect provides evidence of the influence of regional dynamics on dual citizenship policies. A contagion effect significantly increases the

likelihood of a country having a more inclusive citizenship policy, such as dual citizenship policy. This result helps to clarify policy distribution generally and emphasises the link between national policy decisions in a regional context. Future studies could investigate the dynamics behind political alliances, migration movements, or economic ties—that is, the distribution effect—to better grasp the elements driving having dual citizenship policies.

## **CHAPTER 8**

### **COMPARISON BETWEEN COUNTRIES (I)**

Chapters 6 and 7's statistical analysis provides a wide, generalisable picture of the factors linked with dual citizenship policy in 195 countries. Still, quantitative approaches by themselves might not adequately depict the complex sociopolitical factors influencing policy decisions. The comparative qualitative analysis in this chapter and the upcoming Chapter 9 allows for a thorough exploration of these subtleties and provides insights that numbers alone cannot reveal. Statistical analysis, particularly ordinal logistic regression, can identify important correlations and possible predictors of dual citizenship policies. These approaches, however, may have difficulty establishing causality due to confounding factors and the complexity of socio-political circumstances. The comparative study of countries with different citizenship policies in this chapter helps to provide a more rigorous examination of causality. This study can investigate if the hypothesised elements (e.g., physical capital, colonisation experience) really drive these policies or if other contextual factors are at play by methodically comparing countries that vary in their citizenship policies.

This chapter begins by discussing factors of relations with neighbours (H3) and colonisation experience (H9), since they are factors that the previous chapter reported to have the most substantial statistical relationship with the choice of citizenship policy. The chapter then delves into the two factors, physical capital (H1) and country image (H4), which the previous section statistically demonstrated were relevant to citizenship policy. Next, we discuss the factors of human capital (H2), emigration levels (H8), and immigration levels (H7) individually, each having a limited connection to the citizenship policy.

#### **8.1 The Importance of Relations with Neighbours**

H3 indicates that peaceful relations with neighbours favour a dual citizenship policy. When countries' relations with their neighbours are troubled, having a dual citizenship policy may more easily cause suspicion and worries as to whether foreigners will replace the dominance of natives in the economy, and whether other countries have territorial expansion ambitions, using dual citizenship policies as excuses to expand, etc. (Herzog, 2010; Scriver et al., 2016). These suspicions, worries and fears can trigger

disputes and conflicts among countries. Conversely, when governments have good relations with neighbouring countries, both sides trust each other. They are reassured or only slightly worried that citizens of neighbouring countries are authorised to become citizens of their countries, facilitating having a dual citizenship policy for both.

Previous statistical analyses have demonstrated a relatively substantial relationship between relations with neighbouring countries and citizenship policies. A country with amicable and cooperative relations with its neighbours is more likely to have a dual citizenship policy. The index of “relations with neighbouring countries” from the Institute for Economics & Peace and the Economist Intelligence Unit is used to measure the relations with neighbours variable in this research. A country’s relations with neighbouring countries index are classified into five scoring criteria (Institute for Economics and Peace, 2020). The country’s relations with its neighbours become progressively more aggressive as the scores increase. India and Argentina serve as exemplary cases for testing this hypothesis in this section due to their contrasting foreign policy environments and corresponding citizenship policies. India is characterised by relatively aggressive and contentious relations with its neighbours (e.g., Pakistan and China). India maintains a single citizenship policy. Argentina is known for its peaceful and cooperative relations with its neighbours (e.g., Brazil and Uruguay). Argentina endorses a dual citizenship policy.

The Republic of India, commonly known as India, is located in the Indian subcontinent of South Asia, and is ranked seventh in the world in terms of area and the second largest in Asia. India has a large population, with 1.36 billion people as of November 2020, ranking it second globally (the World Bank, 2021). Because of the country's geographical location, it has several neighbours. Pakistan and Afghanistan border India to the northwest, China, Bhutan, and Nepal to the north, Myanmar to the east, and Bangladesh to the east of the Indian state of West Bangladesh. To the south of India are the island nations of Sri Lanka and the Maldives. Two seas also border it: the Arabian Sea to the southwest, and the Bay of Bengal to the east and southeast (EBSCO Publishing (Firm), 2009b).

India scores four out of five on the “relations with neighbours” index, and is aggressive. There are frequent open conflicts with violence and protests. In a policy statement on June 19, 2020, Pakistani Foreign Minister Qureshi said that "India and regional countries are facing diplomatic isolation as their relations are strained"(Cowshish, 2021). In May 2020, India was engaged in several conflicts with

its neighbours: After releasing a new version of the country map in 2019 which showed that it "owned" a disputed area with Nepal, Indian officials announced with great fanfare the completion of a road project through this area in April 2020 (Bhattarai, 2021). In the Gallowan River along the India-China border, the Indian Army has violated its commitments by operating illegally across the Line of Actual Control and launching provocative attacks (Bao, 2021). Also, Indian troops reportedly came down hard on Pakistan, firing indiscriminately and without cause on the Pakistani side near the Line of Actual Control in Kashmir (Cowshish, 2021).

There have been three major wars and one minor war between India and Pakistan in the past few decades. Relations between the two countries have been hostile and tense for most of the time since the partition of India and Pakistan in 1947 over the Kashmir issue (Cowshish, 2021). A mid-January 2016 issue of *India Today*<sup>22</sup> was cautiously optimistic about President Modi's introduction of a "Neighbours First" foreign policy. This policy has led to Modi gaining a reputation for openness and flexibility on Pakistan, which provides him with more options in his approach to Pakistani relations. Most importantly, while Modi is quickly learning how to deal with Pakistan, he also knows whom to deal with: in Pakistan, the army speaks for itself; for Pakistan, the Kashmir issue is essential, and there are also divergent interests within Pakistan (Adnan et al., 2019). Nonetheless, in the past few years, India-Pakistan relations have not improved. In February 2019, multiple Indian military aircraft flew across the Line of Actual Control in Kashmir to launch airstrikes against Pakistan, leading to an air war between the two countries, which once led to fears that a fourth India-Pakistan war was imminent (Pattanaik, 2019). In addition, India has had continuous disputes with other neighbours. Because Nepal's new constitution disagrees with India, India imposed a material embargo on Nepal after the country experienced a massive earthquake in April 2015, which dramatically impacted Nepal's livelihood as Nepal needs to import most of its fuel and gas from India (Pant, 2018). Meanwhile, Bangladesh is angry about India's imposition of the Citizenship Act, which Bangladesh believes can be replaced by executive orders<sup>23</sup> (Chatterjee, 2019; Ranjan, 2019).

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<sup>22</sup> *India Today* is an Indian news magazine and television channel in Indian English. It was founded in 1975 by Indian entrepreneur Vidya Vilas Purie. It mainly covers the latest political and economic news in the country and worldwide. The *India Today* news channel was launched on May 22, 2015 (Wikipedia, 2021).

<sup>23</sup> The amendment to the *Citizenship Act* was passed by the lower and upper houses of the Indian Parliament in December 2019 and was subsequently signed into law by the President. According to the amendment, the Indian government granted citizenship to illegal immigrants from Pakistan, Bangladesh,

Furthermore, there has been an increasingly contentious China-US-India relationship in recent years (Ranjan, 2019).

Given these poor relations with neighbouring countries, first, the people of the neighbouring countries will not necessarily be willing to take Indian citizenship, either because of national sentiments related to unfriendly relations between the countries (e.g., Nepal and India), or for political reasons as mentioned above (e.g., the Pakistan-India conflict over Kashmir), or because of rivalry in the region (China and India) (Elleman et al., 2012; Ganguly & O'Donnell, 2022; Pande, 2011). Second, India itself is reluctant to engage in the relatively free movement of people with neighbours with whom it does not have good relations (by holding dual citizenship), as this may pose a potential risk to India's national security and secrecy (Naujoks, 2015; R. M. Smith, 2011). Possibly, India would welcome people from other countries in the world to take up its citizenship or to have both Indian and other citizen identities (Salazar, 2020). However, opening up the dual citizenship policy would also allow unfriendly neighbours to participate in India's citizenship policy. The potential benefits should not hide the potential dangers.

To take a step back, the potential benefits of allowing people from other countries (other than these unfriendly neighbours) to have dual citizenship with India could also be achieved through other means, such as the "overseas citizens of India<sup>24</sup>" scheme mentioned previously. On balance, India will not use a dual citizenship policy, considering that people from neighbouring countries are unlikely to join India as citizens, and India itself is unlikely to allow these potential hazards to enter the country. As H3 suggests, India has a single citizenship policy. Dual citizenship, or having Indian citizenship and citizenship of a foreign country simultaneously, is not permitted under the Indian Constitution. Section 9(1) of the Citizenship Act 1955 states that any citizen of India who gains citizenship of another nation through naturalisation or registration automatically loses his or her Indian citizenship (Xavier, 2013). The Indian Passports

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and Afghanistan who had entered India before December 31, 2014, due to "religious persecution". Hindus, Sikhs, Buddhists, Jains, Zoroastrians, and Catholics are eligible to apply for Indian citizenship, but only Muslims were excluded. The Modi-led government of the Bharatiya Janata Party (BJP), India's nationalist party, has said that the new law would protect people from persecution. Nevertheless, critics say the new law is essentially part of a plot to marginalise India's 200 million-plus Muslim population and create a Hindu nationalist society centered on Hindus (Chatterjee, 2019; Ranjan, 2019).

<sup>24</sup> Obtaining an OCI card is not equivalent to becoming a regular Indian citizen because OCIs do not have an Indian passport, do not have voting rights, are not eligible to run for Lok Sabha / Rajya Sabha / Legislative Assembly / Council, are not eligible to hold constitutional positions, and are not permitted to work for the government or government organisations (Naujoks, 2015).

Act of 1957 makes it illegal for an Indian passport holder to continue to use his or her Indian passport after gaining the citizenship of another country. Similarly, if a person chooses to become an Indian citizen, he or she must give up his or her former citizenship (Mahardika, 2019).

Argentina is about the same territorial size as the country of India - India is the seventh largest country in the world, and Argentina is the eighth in the world. They are also located in similar geographical situations, with one side bordering the sea and the other side connected to some landlocked and other countries. Despite this, Argentina's relations with its neighbours are much friendlier than India's. India's relations with its neighbours are aggressive, as outlined above. In contrast, Argentina's relations with its neighbours are generally peaceful - as our "relations with neighbours" index suggests, Argentina's relations with its neighbours have an index of 1. In contrast to the single citizenship policy in India, Argentina has a dual citizenship policy.

The Argentine Republic, commonly known as Argentina, is a federal republic consisting of 23 provinces and the autonomous city of Buenos Aires, which is located in the southern part of South America. It is bordered to the north by Bolivia and Paraguay, to the northeast by Brazil, to the east by Uruguay and the South Atlantic Ocean, to the west by Chile, and to the south by the Drake Passage sea (D&B Country Report: Argentina, 2019). Argentina pursues an independent and pluralistic foreign policy, advocates multilateralism and democratisation of international relations, and adheres to the principles of protection of human rights and to international law (Thies & Wehner, 2021). It has diplomatic relations with 184 countries, and is a member of global and regional organisations and multilateral mechanisms such as the United Nations, the World Trade Organization, the Group of Twenty, the Group of 77, the Organization of American States, the Community of Latin American and the Caribbean States, and MERCOSUR (Tulchin, 2018). Argentina pursues a pragmatic and balanced diplomatic course and attaches importance to developing relations with Brazil, Mexico, and other regional powers. It has vigorously promoted South American integration and close economic and trade cooperation between MERCOSUR and the "Pacific Alliance" of Latin America, and is committed to restoring its sovereignty over the Malvinas Islands (known in the UK as the Falklands) and other territories (Levaggi, 2019; Lisińska, 2019). Meanwhile, this series of regional cooperation and friendship strategies includes economic cooperation and UN peacekeeping missions with Argentina's closest neighbours: Bolivia, Paraguay, and Uruguay (Baraibar, 2020). In

March 2019, the second High-level UN Conference on South-South Cooperation was held in Argentina. Furthermore, Argentina is active in regional military cooperation, a member of the UNASUR South American Defence Council, and actively participates in UN peacekeeping operations and joint UN peacekeeping missions with Chile and Peru (Thies & Wehner, 2021).

President Fernandez attaches importance to relations with regional countries; for instance, he hopes that issues such as Venezuela will be resolved peacefully through dialogue and negotiations between the ruling party and opposition parties in the country, and opposes interference by outside forces (Pion-Berlin, 2018; Thies & Wehner, 2021). More than just with its neighbours, Argentina is committed to developing friendly relations with countries in the entire region, enhancing the regional capacity of South America and Latin America as a whole (Baraibar, 2020). Argentina's relations with Latin American countries are based on the principle of good neighbourliness, and the development of relations with other Latin American countries, especially with regional powers, is a diplomatic priority. It attaches importance to the integration of MERCOSUR and considers its strategic alliance with Brazil as the "strategic axis" of MERCOSUR. Strategic partnerships have also been established with Chile and Mexico (Friedman, 2018; Tulchin, 2018).

In contrast to India, Argentina has good, peaceful, and even friendly relations with its neighbours and countries across the South American region. Argentina maintains an independent but also pluralistic approach to the foreign policy of its neighbours. It respects all countries, human rights, and international law, and advocates multilateralism. In South America as a whole, Argentina focuses on cooperation with large countries, such as Brazil and Mexico, and on promoting South American integration. In addition, Argentina is also interested in relations with other regional powers, such as its active participation in UN peacekeeping operations. Argentina's friendly relations with neighbouring countries have made it more comfortable with using dual citizenship policies. To a certain extent, then, Argentina has a dual citizenship policy to strengthen its ties with its neighbours and the region. As H3 suggests, Argentina has a dual citizenship policy in reality. The only requirement for dual citizens is that they must use an Argentine passport to enter Argentina unless they use a passport from a country with which Argentina has a reciprocal agreement (Ministerio de Relaciones Exteriores Comercio Internacional y Culto Argentina, 2021).



## 8.2 The Importance of Colonisation Experience

H9 argues that countries' colonisation experiences favour their choice of having a dual citizenship policy. Colonisation experiences refer to whether a country has colonisation experiences in its history, including having colonised other countries, being colonised by other countries, or having both experiences. When these countries either gained independence or withdrew power from former colonies, they may have suffered from labour loss, reduced resources, and other types of losses to a certain extent (Dahlin & Hironaka, 2008a; Whitaker, 2011). Former colonising countries initially wanted to retain the labour they could access from colonies and keep in contact with nationals overseas, as ways of maintaining their competitiveness. Former colonies, as newly independent countries, wanted to learn technology, management, and various other economic aspects from developed countries, to strengthen their development (Koebner, 2017; Manby, 2016b). A dual citizenship policy facilitates travel to and from different countries, whether for family visits or work needs. This enhances trade, technology, and cultural exchanges between countries. Accordingly, a dual citizenship policy helps former colonisation countries to retain a relatively cheap and abundant labour force and maintain ties with their nationals abroad. It also helps formerly colonised countries to develop themselves after independence (Fung, 2004; Majumdar, 2013).

The previous statistical analyses show that the experience of colonisation has a relatively strong relationship with the choice of citizenship policy by countries.: the countries with a history of colonisation are more likely to have a policy of dual citizenship. This section makes a qualitative comparison between South Africa and Liberia. South Africa has colonial experience and has a dual citizenship policy. Liberia has no experience of colonisation and has a single citizenship policy. By choosing South Africa and Liberia, the study takes into account geographical and continental factors. This lets the impact of colonisation history be studied without having to deal with other factors like regional politics or the economy. Both countries are on the African continent and share certain broad regional characteristics, but their divergent colonial experiences provide a natural experiment to assess the impact of colonisation on citizenship policies.

The Republic of South Africa, commonly known as South Africa, is located at the southern tip of Africa, where the South Atlantic Ocean meets the South Indian Ocean. South Africa is one of the most racially and culturally diverse countries in Africa and the world. It has the largest number and proportion of European immigrants, Indians, and people of colour of any African country (Manby, 2016a). Diverse races and racial

struggles have been an important part of South African history and politics, with a racial conflict between the white minority and the black majority dominating all aspects of South African politics, society, and culture in modern times. South Africa has a colonisation experience in its history, including both being colonised by, and colonising, other countries. As H7 and statistical evidence suggest, South Africa, with its colonisation experiences, has a dual citizenship policy.

In 1487, the Portuguese explorer Bartholomew Dias led the first European landing in southern Africa. On his return to Portugal, King João II renamed a cape in Africa "Cabo da Boa Esperança" because it was a key point on the sea route from Europe to Asia which made Portugal rich (Trapido, 1971). As the Portuguese began to explore, trade, and rule in Africa, South Africa went through two major colonial periods: the Dutch Cape Colony, established by the Dutch East India Company in 1652 following the Dutch-Portuguese War, and the British Colony, which began with the occupation of the Dutch Cape Colony in 1795. During the Dutch colonial period, the Dutch began to exploit Cape Town in South Africa in 1647. At first, the Dutch survived through the fresh water and meat they received from local people. They then went on to sow vegetables on the fertile land of Cape Town. However, as the local Khoikhoi were not agricultural people, the East India Company had to bring in farmers from the Netherlands to carry out agricultural activities. On its return to Holland, the East India Company appreciated the potential of Cape Town as a storehouse and garden for Dutch ships sailing long distances to Asia and trading through Cape Town (Beck, 2000).

On 6 April 1652, a century and a half after discovering the Cape Route, Jan van Riebeeck landed at Cape Town near the Cape of Good Hope on behalf of the Dutch East India Company. The company established a way station, including a garrison and vegetable and fruit gardens to supply ships passing through Cape Town on their voyages to Asia. Many of the East India Company's employees remained in the Dutch Cape Colony at the end of their service contracts, eventually making Cape Town an area with many 'free citizens' (Vrijlieden). Dutch traders also imported thousands of enslaved people to South Africa from the colonies of Indonesia, Madagascar, and Eastern Africa (Davenport & Saunders, 2000; Gallagher, 2013).

British immigration to South Africa began in around 1818, with the subsequent arrival of settlers in 1820 marking the peak of the wave. To some extent, the new colonists addressed and increased the size of the European workforce, in turn strengthening the defences of the frontier areas to deter the Xhosa from attempting

invasion (Davenport & Saunders, 2000). The discovery of diamonds in the Kimberley in 1867 and gold in Johannesburg in February 1886 prompted the start of the mineral revolution and accelerated South Africa's economic growth and immigration numbers. Britain strengthened its control over the Aboriginal people. Competition for, and control of, these vital economic resources was one of the factors that influenced relations between Europeans and Aborigines, and between the Boers and the British (Trapido, 1971).

In addition to this, South Africa also colonised another African country, Namibia. In 1915, South Africa, as a part of the Commonwealth, occupied German South-West Africa during World War I. In the 1980s, as international pressure increased and South Africa became more democratised and racially equal, South Africa finally agreed to Namibia's independence, which was declared in 1990 (Gallagher, 2013).

During its successive colonisations by the Dutch and the British, South Africa suffered from the plundering of vast resources, invasion and administration by European governments, and the South African people being treated as cheap labour. The colonial forces also transported many of their enslaved people from other colonies to South Africa. The Europeans then came to South Africa to take over management jobs. The colonial past therefore brought much misfortune to South Africa. Nonetheless, in the early years after independence, the Western production systems and management models left behind by the European colonial powers in South Africa, and the management of some of the white elite who remained to work there, combined with South Africa's own unique resource advantages, did generate rapid development in the country between the 1950s and 1990s.

In the 1960s and 1970s, South Africa boomed. In 1965, South Africa's manufacturing sector was so advanced that its output exceeded that of the traditional mining and agricultural industries combined. This figure shows that South Africa was already an industrialised country (Crocker, 1980). At that time, South Africa was at the forefront of developing its infrastructure, and culture and education sectors. It was near the top of a global social index, at Japan's level, in the areas listed. By the mid-1970s, South Africa even accounted for 40% of Africa's total industrial output, 50% of its rail transport, 60% of its electricity capacity, and 90% of its steel production. In the 1980s, South Africa's economy grew at a rate of 7.8%, the third-highest growth rate in the world, after Japan and Singapore. In addition to being industrially advanced, South Africa is also rich in mineral resources, and is among the world's top producers of

domestic precious metals such as gold, manganese, vanadium, and chromium, as well as diamonds (Beinart, 2001).

At the same time, however, South Africa also went through a period of apartheid and subsequent anti-apartheid resistance between 1948 and 1994. Under apartheid, minority white rule was imposed (less than 20% of the country being white) which dominated South African politics and society through a system of racial segregation, before being dismantled, at which point Black people entered mainstream life and could live together with white people as equals from the early 1990s onwards. South Africa today is often referred to as the Rainbow Nation<sup>25</sup>, to symbolise the end of apartheid and the newfound cultural diversity of the country. There is the promise that people of all races can live together in a beautiful and peaceful country (Gallagher, 2013; Thompson, 2008).

While acknowledging the damage caused by the colonisation experience, we can also see from the rapid economic development of South Africa in the pre-independence period that the production systems, economic models, and managerial skills of the white elite, and the educational systems inherited from Western countries did help South Africa to develop economically, industrially, and in its education system. The subsequent effects of the colonisation experience, such as apartheid and the struggle against it, have led to the encouragement of cultural diversity in South Africa today so that it is now promoted as a country where people of different races can live together in peace. The dual citizenship policy is an expression of this, based as it is on cultural diversity and the encouragement of peaceful co-existence between different races. It also expresses the desires to continue learning from the developed world and to attract more talent and human and physical capital to South Africa. The dual citizenship policy is a way to do this. Based on the experiences that the colonial past has brought to South Africa, the country's government has identified and understood from various perspectives that a dual citizenship policy has certain benefits for its development and is in line with the country's current values (e.g., cultural diversity, tolerance of multiple races). Thus, as H7 indicates, South Africa, with its colonisation experience, has a dual citizenship policy. A condition of attaining dual citizenship for all South African citizens aged 18 years or older is that they must apply and be granted permission to

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<sup>25</sup> The name was initially conceived by Desmond Tutu, the former Archbishop of the Anglican Church of Cape Town and later popularised by the then President of South Africa, Nelson Mandela (Gallagher, 2013).

retain their South African citizenship prior to acquiring foreign citizenship (Manby, 2016a; Whitaker, 2011).

The historical background of Liberia offers one unique situation inside the African continent. Liberia was neither colonised by other colonial powers nor a colonising power unlike South Africa and other African countries. Rather, it began with early 19th-century American slaves who had been liberated (Clegg, 2004). Officially the Republic of Liberia, Liberia is a nation on the coast of West Africa. Sierra Leone borders it from northwest; Guinea from north; Ivory Coast from east; the Atlantic Ocean from south and southwest. Liberia was the first African republic to proclaim its independence and is Africa's first and oldest modern republic. It was a country that maintained its sovereignty and independence during the European colonial "Scramble for Africa" (Clegg, 2004; Whyte, 2016)

Mamdani (2002) claims that national identities in African nations have been very moulded by colonial history. The imposition of foreign control upset pre-existing political and social systems, hence generating new identities and national borders. This sometimes included the restructuring of communities into organisations that suited the administrative and financial interests of the colonists instead of indigenous social systems (Mamdani, 2002; Robinson, 2019). Usually, this process included the arbitrary construction of borders that combined several ethnic groups under one administrative unit, hence producing multi-ethnic states that had to control notable internal diversity. Accordingly, the colonial control affects national identity. Policies carried out by colonists sometimes reinforced differences between many ethnic and social groupings. For instance, the British colonial strategy of indirect rule in Nigeria supported local traditional chiefs' governance, hence strengthening ethnic identities (Crowder, 1964). In Rwanda, Belgian colonial control similarly widened racial classifications-based policies separating Hutus from Tutsis, hence aggravating ethnic tensions (Mamdani, 2002). These distinctions were institutionalised in the colonies' legal and administrative systems as well as socially (Robinson, 2019). European languages, educational systems, and faiths added still another level of complexity to indigenous identities. Post-colonial governments thus inherited a history of fractured national identities, which they had to negotiate in the course of nation-building and government (Jabri, 2012; Robinson, 2019; C. M. Shaw, 1998).

Liberia was never colonised by a European power in sharp contrast to the histories of most African nations. Under the American Colonisation Society (ACS), freed

American slaves founded it in the early 19th century in an attempt to establish a society shaped after American principles and institutions (Jabri, 2012; Whyte, 2017). Many white Americans favoured the concept of resettling freed slaves in Africa to solve what they perceived as the issue of free Blacks in the United States, therefore this project was motivated by both racial concerns and charitable ones (Clegg, 2004). As so, the founding of Liberia was closely entwined with American ideas and the sociopolitical setting of antebellum United States.

The Americo-Liberians, descendants of the freed slaves who settled in Liberia, played a pivotal role in shaping the country's national identity. They established political and economic dominance, endeavoring to replicate American societal structures and governance models. This included the creation of a constitution in 1847 that closely mirrored that of the United States, emphasizing republicanism, individual rights, and the rule of law (Dunn & Tarr, 1988). For the indigenous African people, the Americo-Liberians saw themselves as a civilising agent bringing Christianity, Western education, and American cultural standards. The social hierarchy that developed reflected this self-image: Americo-Liberians created an elite class that regularly mistreated indigenous Liberians, whom they considered as less civilised (Akpan, 1973). This dynamic had a profound impact on the establishment of Liberia's national identity, creating a contrast between the American-Liberian elite and the indigenous populace. Reflecting the American system of government, Liberia set up a judiciary, an executive branch run under a president, and a bicameral legislature (Joekai Jr, 2022; Whyte, 2017). Although this structure was meant to produce a stable and democratic governance system, in reality it frequently kept the majority indigenous population out of significant political involvement (Nettles, 2008). Economically, the Americo-Liberians developed a plantation-based economy like to that of the Southern United States, mostly depending on rubber output, which turned into the pillar of Liberian economy (Sawyer, 1992). Building massive rubber fields and becoming into a major economic actor in Liberia, the American company Firestone Tyre and Rubber Corporation changed the economic model. This economic system enhanced American influence in Liberia by strengthening the control over its resources and economic policies by the Americo-Liberian elite (Dalton, 1965; Sawyer, 1992).

Under the Americo-Liberian hegemony, indigenous Liberians were often disenfranchised from a tiered society. Mostly excluded from political power and economic opportunities, these indigenous people ranged in ethnicity from the Kpelle,

Bassa, Gio, and others. Policies and acts favouring the Americo-Liberians in terms of property ownership, educational prospects, and political engagement helped to sustain this social stratification (Dunn & Tarr, 1988). Mostly left out of the highest levels of political and financial power, the indigenous people—who constituted many ethnic groups with unique languages and cultures—were Tensions and strife resulting from this marginalisation have dogged Liberia's history. The predominance of the Americo-Liberian elite led to a sense of disenfranchisement among the indigenous people, hence fueling political unrest. Deep-rooted ethnic and societal divisions help to explain some of Liberia's late 20th and early 21st century civil conflicts (Ellis, 2006).

In modern Liberia, there are numerous and ongoing endeavours to redress past injustices and promote national unity. Accepting a single citizenship policy is a critical component of the government's efforts to develop a unified national identity and overcome long-standing divides. Liberia hopes to create a more inclusive and stable society by stressing a single national allegiance, therefore negating the historical legacies of separation and exclusion (Dunn, 2009). The 1986 Constitution, which forbids Liberian citizens from holding citizenship in another nation, therefore embodies the single citizenship policy of Liberia (Constitution of the Republic of Liberia, 1986). This strategy demonstrates a deliberate effort to ensure that the Liberian state defines the primary allegiances and identities of individuals. Considering Liberia's historical background, the emphasis on individual citizenship may be seen as a response to the need for stability and unity within the country. By avoiding fragmented loyalties and outside influences that can possibly aggravate internal conflicts, the single citizenship policy seeks to unite national identity. Ensuring that people have a single national loyalty is considered as absolutely essential for promoting unity and a shared sense of purpose in a society with a convoluted history of ethnic and class stratification. Given Liberia's attempts towards reconstruction and development following protracted periods of civil warfare, this strategy is especially important (Sawyer, 2005).

### **8.3 The Relevant Role of Physical Capital**

As the statistical analyses show, higher levels of physical capital favour having dual citizenship policies. Countries use dual citizenship policies as a strategic tool to attract foreign investment, thereby contributing to their development. This section compares France and India to see how the relationship between the physical capital and citizenship policy plays out in practice. For purposeful as well as intuitive reasons,

France and India have been selected as comparative case studies. The two countries' various political, economic, and historical settings provide a thorough and in-depth research. The history of France comprises complex immigration rules, economic growth, and colonial expansion. France had major economic rebuilding difficulties following the Second World War, which prompted government programmes aimed at advancing nation-building and development. One-way legal systems change in response to economic needs is through the slow relaxation of citizenship limitations that results in the adoption of dual citizenship. India's history is marked by its colonial past, the struggle for independence and subsequent nation-building. After independence, India adopted a protectionist economic approach with a strong emphasis on national sovereignty and unity, reflected in strict citizenship laws. The Overseas Citizens of India (OCI) scheme, introduced in 2004, is a major legislative change aimed at economically integrating the Indian diaspora without requiring dual citizenship.

The following comparison between France and India is to demonstrate that France has adopted and maintained a policy of dual citizenship to attract more foreign investment and physical capital. Conversely, India, which initially did not receive high levels of foreign investment, had less incentive to adopt a dual citizenship policy. Countries like India might adopt other, less risky strategies to attract foreign investment and physical capital to support their development. It is evident that while higher physical capital is attractive to countries adopting dual citizenship policies, it is not the main factor driving the citizenship policy. Dual citizenship rules are a calculated instrument meant to draw more foreign capital and physical resources for national growth.

According to the French Nationality Code 1986, foreigners born or settled in France may acquire French citizenship based on their country of birth. Foreigners married to French nationals or adopted children of French citizens may likewise become French citizens. Applying for French citizenship does not mean renouncing one's original citizenship or that of a foreign citizen; neither does a French citizen forfeit their own citizenship. Moreover, regardless of how they obtained it, French people do not lose their French nationality until they seek for it (Skocpol & American Council of Learned Societies, 1979; Vera-Larucea, 2012). More generally, on January 9, 1973 men and women were granted dual citizenship. Since then, possession of more than one nationality does not affect French citizenship (Loi n°93-933 of 23 July 1993; Loi n° 73-42 of 9 January 1973). Nonetheless, France did not start with a dual citizenship policy.



There was a gradual process of liberalising the dual citizenship policy. During this gradual liberalisation process, the French economy has slowly turned from a relatively low level to an economic upswing. Although we cannot determine the cause and effect of this, we can see that the use of dual citizenship in France has some connection with promoting physical capital and thus economic development. This shows that countries are using dual citizenship policies as a strategic tool to attract foreign investment and thereby contribute to their development.

In September 1944, when General de Gaulle formed the provisional government, the French economy was in a state of flux. With a portion of the population still serving as prisoners of war in Germany, France had a shortage of labour. Because of bombing damage and a lack of fuel and raw materials, French industrial production was only slightly higher than a third of its pre-war level (Sauvy, 1969). Although agricultural output fell to a lesser extent during the war, subsistence farmers and the breakdown of transport caused urban food supplies to be severely inadequate. The lack of foreign currency, ships, and ports. Shortages, market disconnections, and inadequate price controls led to an average annual inflation rate of around 30%. In this context, the economic task of improving the population's living conditions, rebuilding the infrastructure, and modernising the economy became highly urgent (Magalhães et al., 2019; Piketty et al., 2006).

However, France was in a state of protectionist isolation before 1959. Except for a few successful attempts at foreign trade, successive French governments maintained the tariff protectionism inherited from the *Melina Act* and the foreign exchange control policy established in 1939. French importers had to hold a license to obtain foreign currency from the Banque de France's exchange control bureau, which also converted French exporters' foreign exchange earnings into francs. Exporters could only obtain an export license if they first met domestic demand. The Ministry of Finance either requires pre-approval for non-trading activities such as lending, direct and portfolio investment, foreign exchange, and gold trading or prohibits them (Mourlon-Druol, 2020; Mulvey, 2019). By implementing such a policy, France was essentially "isolated" internationally. As a signatory to the *Havana Charter of 1948*, France maintained a quota system that was opposed to the principles of *the General Agreement on Tariffs and Trade*: except for the years 1954–1955, and June 1957–October 1958, the proportion of free trade (the share of unquote imports) was deficient if not zero (Piketty

et al., 2006). As a member of the European Payments Union<sup>26</sup>, established in 1950, France did not comply with the requirements of the European Monetary Agreement<sup>27</sup>, signed in 1955. Instead, it adopted control measures opposed to those of the pound and the mark, stipulating that non-French citizens could not exchange the franc for foreign currency and could not transfer it abroad. The French "Schuman Plan"<sup>28</sup> led to the establishment of the European Coal and Steel Community<sup>29</sup>. The Messina Conference<sup>30</sup> between France and five other member states established the European Economic Community<sup>31</sup>. The Treaty of Rome came into force on January 1, 1959, and France was not ready to abolish tariffs and trade quotas (Mulvey, 2019; Sauvy, 1969).

In September 1958, approximately 15 years later, Charles de Gaulle returned to power during the May 13th crisis and adopted the Constitution of the Fifth French Republic by referendum, which brought about a miraculous economic transformation and a boom in industrial production, doubling the pre-war level of industrial output. Almost unknown industries such as household appliances, petrochemicals, and electronics developed rapidly. For the first time in its history, France entered a period of economic growth lasting 30 years, which did not end until 1975, after the first oil crisis<sup>32</sup> (Leroux & ProQuest, 2011; Piketty et al., 2006). During this period, FDI net inflows increased significantly, particularly from 1987 until the financial crisis of 2008, highlighting the connection between dual citizenship policies and the attraction of

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<sup>26</sup> In July 1950, Western European countries established the European Payments Union, a multilateral clearing organisation, to address their foreign exchange challenges and enhance foreign trade through the development of a multilateral clearing system (Sauvy, 1969).

<sup>27</sup> In August 1955, the European Monetary Agreement was signed to replace the European Payments Union with a new balance of payments system, which was implemented in December 1958 (Sauvy, 1969).

<sup>28</sup> At a press conference on May 9, 1950, French Foreign Minister Robert Schuman announced the Schuman Plan, which proposes to place all French and German coal and steel production under the control of a high-level association in which all other European countries could participate, and to immediately exempt the movement of coal and steel between member states from all customs duties (Mulvey, 2019).

<sup>29</sup> On April 18, 1951, the Treaty of Paris came into effect. According to the terms of the treaty, the member states have direct access to the raw materials for coal and steel production without paying customs duties. The contracting parties to the European Coal and Steel Community are France, West Germany, Italy, Belgium, the Netherlands, and Luxembourg (Mulvey, 2019).

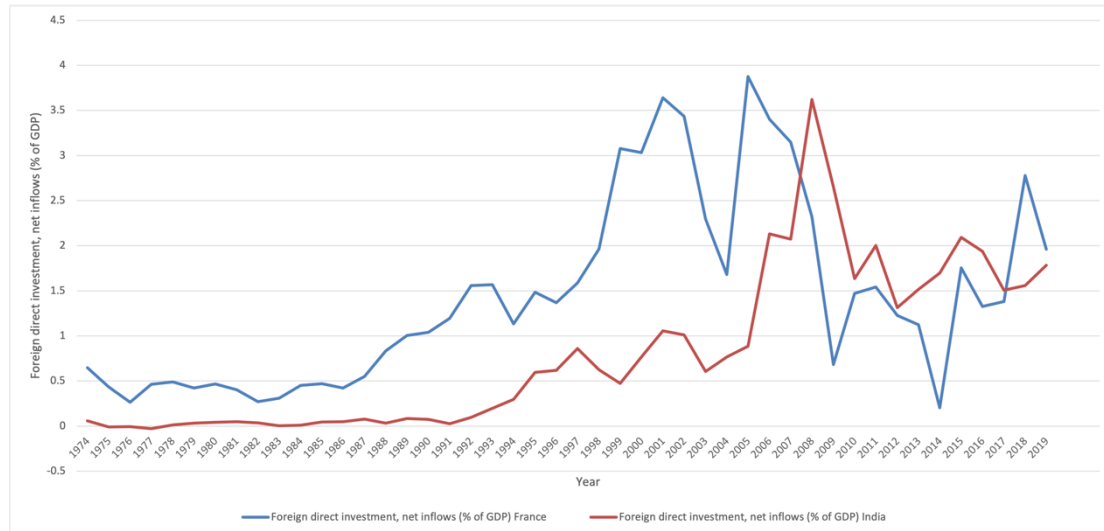
<sup>30</sup> The Ministers of Foreign Affairs of the Member States of the European Coal and Steel Community convened the Messina Conference in Messina, Italy, from June 1–2, 1955 (Mulvey, 2019).

<sup>31</sup> France, the Federal Republic of Germany, Italy, the Netherlands, Belgium, and Luxembourg signed the Treaty establishing the European Economic Community (EEC) in Rome in March 1957. On January 1, 1958, the EEC established its headquarters in Brussels (Sauvy, 1969).

<sup>32</sup> In October 1973, the fourth Middle East war broke out, and in order to combat Israel and its supporters, the OPEC members announced in December that year that they were withdrawing their oil pricing rights and raising their crude oil price from \$3.011 to \$10.651 per barrel, thus triggering the worst global economic crisis since the Second World War (Leroux & ProQuest, 2011).

foreign investment, as evidenced by the Figure 8.1 below.

**Figure 8.1: Foreign Direct Investment Net Inflows (% of GDP) of France and India (1974<sup>33</sup>-2019)**



Data Source: the World Bank

The gradual implementation of dual citizenship in France coincided with this period of economic growth. The recognition of dual citizenship in France began gradually around 1954. In 1973, France recognised and allowed dual citizenship for men and women; since then, having more than one citizenship did not affect French citizenship (Loi n° 73-42 of 9 January 1973). The comprehensive policy of recognising and allowing dual citizenship began in 1986, including recognising and allowing French citizens to become citizens of other countries and citizens of other countries to become French citizens (Skocpol & American Council of Learned Societies, 1979; Vera-Larucea, 2012). The first 30-year period of economic development in France's history, referred to above, coincides mainly with the gradual adoption of a dual citizenship policy. While we cannot establish a causal relationship, we can observe a positive correlation between physical capital and citizenship policies. The dual citizenship policy is a means to increase physical capital for economic development.

In contrast, India has historically adhered to a single citizenship policy. From 1970 to 2004, India's FDI net inflows were much lower compared to France, as depicted in the graph. However, in 2005, FDI net inflows increased, thanks in part to the

<sup>33</sup> The World Bank began providing data on this indicator for two countries as early as 1974.

implementation of the Overseas Citizens of India (OCI) plan in 2004, which attempted to encourage investment from expatriates while maintaining a single citizenship policy.

Dual citizenship has always been illegal under Indian citizenship regulations, which are established in the 1955 Constitution. The Citizenship Act 1995 of the Indian Constitution clearly and strictly states that no foreign citizen can hold Indian citizenship, and any Indian acquiring the citizenship of another country must automatically renounce Indian citizenship (Basu, 2019; Hall, 2012). The Constitution prohibits foreigners from owning property in India, holding public office, joining the army or working in any sector. Foreigners, especially those of Indian origin, cannot enjoy the same benefits as Indian citizens while visiting India for a short or long period of time (Mahardika, 2019). The Indian government has long been adamant about this.

However, on January 9, 2003, when the Government of India convened the first Overseas Indian Day celebration in New Delhi, Prime Minister Vajpayee officially announced that India would introduce the Overseas Citizens of India (OCI) scheme and subsequently initiated the legislative process. At the time, the Indian government announced the basic elements of OCI, which included granting OCI only to the fourth generation of descendants of Indians who left India after 1947, ensuring the possession of an Indian passport, the ability to visit India without a visa, and the ability to conduct business and purchase property in India (Raj, 2015; Salazar, 2020). When the programme was first announced, the Indian government explained that giving OCI conferred all Indian rights save the power to vote. However, when delegates at the first Overseas Indian Day celebration discussed the constitutional amendment to the citizenship clause, the Indian government clarified some misunderstandings and made clear some of the prohibitions: OCI could not vote or run for office, join the army, or hold certain statutory positions. As such, the restrictions cover not only the right to vote, but also the right to stand for election and various administrative functions. This has helped to allay some of the concerns of Indian citizens (Kumar-Banerjee, 2019; Naujoks, 2015). Still, the Indian government has declared unequivocally that the manner the OCI handles matters guarantees that foreign Indians who have OCI can own property and make investments in India (Venkatesan, 2003). This seems to be the minimum of their guarantees, for foreign Indians.

Nevertheless, the Indian government does not treat foreign Indians equally. Its target or concern is only for foreign Indians in the more economically developed countries or the wealthier groups of foreign Indians. From the outset, the Singhvi

Commission recommended that the United States, Canada, the United Kingdom, the European Union, Australia, Singapore, Malaysia, Thailand, Japan, and New Zealand should grant OCI. Indians from these countries (and regions) are the wealthiest and most educated. The Indian government narrowed the scope for granting OCI to only seven countries after careful selection. In other words, only foreign Indians from seven countries can apply for Indian citizenship. These comprise the United States, the United Kingdom, Canada, Australia, New Zealand, Singapore, and Malaysia (Mahardika, 2019). The restrictions of the citizenship policy of the other nation could possibly be among the reasons the Indian government is reducing the focus. Should India let persons of Indian heritage from other nations to have Indian citizenship, it could cause conflict should the other country forbid dual citizenship (Hall, 2012).

Delegates from all spheres of Indian life as well as from overseas have reacted strongly at the unveiling of the OCI scheme by the Indian government. The OCI scheme was assailed heavily even among those who backed the Indian government, although getting more support than that of the opposition. For many of the delegates to the Overseas Indian Day celebrations, one of the most unacceptable features of the OCI scheme was the fact that the Indian government only provided OCI to expatriate Indians or foreigners of Indian origin from some developed countries while excluding expatriate Indians or foreigners of Indian origin from most countries (Hall, 2012). They saw this as an obvious prejudice. They called India's proposed OCI policy 'dollar and pound citizenship' (Reddy, 2003). Overseas Indian was thus hotly debated. Some Indian government officials also claimed that they would pay attention to the demand for 'equal treatment' for overseas Indians (Raj, 2015).

The Rajya Sabha discussed a draft amendment to the Constitution on May 9, 2003. The Indian Parliament voted on the amendment in December 2003, and the President approved it on January 7, 2004. The Overseas Indian Festival announced the final version of India's OCI scheme, which underwent modifications. The most notable change is that the Indian government now includes 18 countries under OCI's purview, therefore transcending the boundaries of the founding countries. Along with the Netherlands and Italy, the programme first comprised the United States, the United Kingdom, Canada, Australia, Malaysia, New Zealand, and Singapore. The plan now calls for still further nine countries: Ireland, Portugal, Switzerland, Greece, Cyprus, Israel, France, Sweden, and Finland (Mahardika, 2019).

We can see that the additional countries are still among the world's leading

developed countries. Allowing Indians from these countries to hold OCI goes a long way in achieving the objective of the Indian government in starting this scheme, which is to attract investment from expatriate Indians and thereby enhance the attractiveness of global capital; secondly, to use the management and business skills of expatriate Indians to effectively neutralise or address the challenges of globalisation; and thirdly, to increase national income and GDP (Raj, 2015; Salazar, 2020). To a large extent, the OCI scheme is already very similar to the dual citizenship policy. Due to the limitations of the country of destination and the risk of unfairness and discrimination against overseas Indians from non-participating countries, many democracies cannot implement such a scheme. The project has brought about the high growth of FDI net inflows in India since 2005, and the growth of physical capital has boosted the country's economy. India clearly maintains the single citizenship policy; however, the OCI scheme appears to grant some rights to foreign citizens, attracting more physical capital. As India shows, countries may utilise different approaches to improve physical capital while keeping a single citizenship policy. As France did, countries may also utilise their dual citizenship policy as a tactic to boost foreign investment and help their own development.

In conclusion, Figure 8.1 effectively illustrates the differences in FDI trends between France and India, presenting the analysis. France's higher levels of FDI and net inflows (% of GDP) provide strong motivation for adopting and maintaining a dual citizenship policy. In contrast, India's lower FDI levels and single citizenship policy are supplemented by the OCI plan, which provides an alternate strategy for luring international investment. Physical capital has an impact on citizenship policy, but it is not the primary element in deciding whether a country adopts a dual citizenship policy.

#### **8.4 The Relevant Role of Country Image**

H4 suggests that a good country image favours having a dual citizenship policy. With the deepening of globalisation across the world, there are colossal communication and movements between countries, both in economic aspects and politically and culturally (Harpaz, 2019; Rubenstein, 2007). The world also acknowledges cultural diversity and human rights have received a lot of attention in the 21st century. This international atmosphere encourages many countries to become more tolerant and open (Seligman et al., 2000; M. P. Vink et al., 2013). Countries with a good national image use dual citizenship policies to project a positive image of their country and as a way to fulfil

their national commitments. At the same time, these countries can increase their soft power and international prestige because of their good national image. “Global Freedom Scores” is the indicator used to measure the variable of a country’s image in H4. Usually, the higher the degree of freedom within a country, the better the country’s image is perceived to be, with a high tolerance, openness, and pluralism. The total global freedom scores of a country consist of its scores (and status) in relation to political rights and civil liberties (Freedom House, 2020).

In the previous statistical analysis, we found that regime type, political stability and government effectiveness were highly correlated with the global freedom score, which led to a collinearity problem. In layman's terms, using any one of these indicators to describe its relationship with dual citizenship policy is roughly equivalent to using several other indicators to describe its relationship with dual citizenship policy. Due to statistical limitations, we will use the qualitative case comparisons in this section to discuss regime type, political stability and government effectiveness when discussing the relationship between country image and citizenship policy.

Malaysia has a moderate country image in terms of global freedom scores and a single citizenship policy. South Africa has a better country image: it is slightly higher than Malaysia in terms of global freedom scores, but not by much; at the same time, South Africa has a dual citizenship policy. By comparing Malaysia and South Africa, we can see the relevant impact of country image on the country's citizenship policy, but we can also see that country image is not the driving element in determining a country's citizenship policy.

Malaysia is a country located in Southeast Asia. It is a federal, parliamentary democratic, electoral and constitutional monarchy formed on 16 September 1963 by the former United States of Malaya, North Borneo, Sarawak and Singapore<sup>34</sup> (Salleh & Ab Rahman, 2020). If we look at Malaysia's national image in terms of its Global Freedom status alone, Malaysia is regarded as partly free (with a score of 51) – as such, it is a country with a low to moderate image. The population has moderately weak political rights and civil liberties. In terms of political rights, we can start by considering the electoral process in Malaysia. The Senate, or Dewan Negara, is the upper house of the bicameral Parliament in Malaysia, with 44 members selected by the monarch on the

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<sup>34</sup> The state of Singapore was later delisted from the Federation on 9 August 1965 and became an independent country.

advice of the prime minister, and 26 members elected by the 13 state legislatures for three-year terms. The Senate's ability to amend or block legislation approved by the House of Representatives is limited. The House of Representatives has 222 representatives filled by direct elections in single-member constituencies (Stothard, 2018). The prime minister is the head of the government and the country's top executive. The prime minister and cabinet's authority is dependent on the support of a majority in the lower house of Parliament, although they are legally nominated by the king (Salleh & Ab Rahman, 2020; Stothard, 2018). However, Muhyiddin Yassin of the United Indigenous Party of Malaysia (PPBM) was not elected in free and fair elections. Instead, following the resignation of Mahathir Mohamad, he was appointed Prime Minister. PPBM then decided to withdraw from the PH coalition<sup>35</sup> and form a new PN coalition with the United Malays National Organisation (UMNO), the Islamic Party (PAS), and smaller parties (Oxford Analytica, 2021a, 2021b; Yeoh, 2021). From this point of view, the current head of government and other key Malaysian state authorities have not been elected in sufficiently free and fair elections.

In terms of personal autonomy and individual rights, Malaysian citizens are generally free to travel within and outside Malaysia and to change residence and work as they see fit (Stothard, 2018). However, regulations and practices that favour the indigenous and those linked to the political elite affect career opportunities and access to higher education. Such practices are illegal, yet the employers of migrant workers often hold their passports to prevent them from leaving abusive situations (Bailey & İnanç, 2018). There is also controversy over whether Malaysians can express their personal views on political or other sensitive topics without fear of surveillance or reprisal. The initial declarations and activities of the PH government produced a more open environment for the public debate of previously taboo topics (Leung, 2021; Stothard, 2018). However, the government has not delivered on its promise to repeal the Sedition Law, and meanwhile, other restrictive laws, including a criminal ban on blasphemy remain in place, preventing individuals from expressing themselves on sensitive political and religious topics (Stothard, 2018; Teh & Ngu, 2019). During the recent COVID-19 pandemic, the Malaysian government announced that legal action would be taken against those spreading fake news related to COVID-19 under the

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<sup>35</sup> PH coalition or PH government: Alliance of Hope (Malay: Pakatan Harapan) is an electoral coalition political party in Malaysia, formed on 22 September 2015.



Sedition Act, the Penal Code, and the CMA<sup>36</sup>, and other laws (May 2020); by October, at least 270 such cases had been filed (Leung, 2021; Ufen, 2021). In addition, the Malaysia Airlines incident<sup>37</sup> in 2014 was another heavy blow to Malaysia's image (Satawedini, 2020; Shiang et al., 2021). The lack of clarity as to what happened was another blow to the transparency of the Malaysian government.

In general, Malaysia's country image presents a moderately weak level regarding people's political rights and civil liberties. Malaysia is a federal, parliamentary democracy, an elected monarchy, and a constitutional monarchy in terms of its system of government. However, Malaysia's elected parties or political leaders were not freely and democratically elected in recent times. Some of the rights of the people to freedom and democracy, such as freedom of movement, freedom of expression, and freedom to change citizenship or to hold multiple citizenships, are not as quickly acknowledged as in countries with a good country image and a high degree of freedom (these countries are usually democratic<sup>38</sup>). In other words, Malaysia's country image is not excellent, as indicated by its low to medium global freedom scores. As H4 suggests, Malaysia uses a single citizenship policy. The Malaysian nationality law governs citizenship and other forms of nationality in Malaysia. Articles 14 to 31 of the Malaysian Constitution establish this law. It states that someone with Malaysian citizenship is not permitted to hold citizenship in any other country. Dual citizenship is therefore not permitted in Malaysia (Low, 2017).

In contrast, South Africa has a relatively good image internationally. The Republic of South Africa, commonly known as South Africa, is located at the southern tip of Africa (Matiza & Slabbert, 2020). Although some people may initially think of African countries as generally less developed and turbulent, South Africa is, in fact, a very constitutional and democratic country. Since the end of apartheid in 1994, South Africa has been seen globally as a supporter of human rights and a leader on the African continent (Matiza & Slabbert, 2020; Misago, 2017). In recent years, the ruling African

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<sup>36</sup> *Malaysian Communication and Multimedia Act of 1998 (CMA 1998)*, Act 588.

<sup>37</sup> At 00:41 on 8 March 2014, Malaysia Airlines flight MH370, which had taken off from Kuala Lumpur Airport in Malaysia, disappeared from civil aviation radar. Seventeen days after its disappearance, Malaysia Airlines announced that the flight had crashed, killing all 227 passengers and 12 crew members on board. The loss of Malaysia Airlines flight MH370 was the fourth air disaster in the history of Malaysia Airlines. It is also considered the "most bizarre" civil aviation incident in the history of the world's civil aviation, which started with the plane's loss and quickly turned into a crisis event for Malaysia Airlines. The complexity of the incident has since escalated into a national image crisis for Malaysia (Satawedini, 2020; Shiang et al., 2021).

<sup>38</sup> Democracies are more likely to have a good country image in the current international climate.

National Congress (ANC) has been accused of eroding state institutions to protect corrupt officials and maintain power (as its support base dwindled). In 2018, a well-respected judge-led anti-corruption commission began hearing testimony on allegations of high-level corruption (Lechini & Marchetti, 2021). The central national authority in South Africa, which includes the President and the Parliament, is elected through free and fair elections. President, who is both the head of state and the head of government, is elected by the National Assembly, the lower house of Parliament, from among its members. The members of the National Assembly, in turn, are elected by the citizens of South Africa (Lechini & Marchetti, 2021; Ngang, 2021). The president can only be re-elected for a maximum of two terms of five years each. The 400-seat National Assembly is elected by a party-list proportional representation system. The 90 members of the upper house, the National Council of Provinces, are elected by the provincial legislatures. The Independent Electoral Commission (IEC) is also largely independent (Ngang, 2021; Obodo, 2019). In conclusion, it has been argued that South Africa's national legislative representatives are elected through free and fair elections, and that the relevant electoral management bodies perform impartially (Lechini & Marchetti, 2021).

In terms of the rights of citizens to freedom of expression and belief, freedom of expression and freedom of the press are constitutionally protected for the people of South Africa, and this is generally respected in practice. South Africa also has a vibrant and confrontational media landscape, including independent citizens groups that help to counter government infringements on freedom of expression (Ngang, 2021). In 2017, the media played a crucial role in exposing corruption linked to the Gupta family and the involvement of British PR firm Bell Pottinger in fanning racial tensions in the country (Obodo, 2019). Individuals are free to express their personal views on political and other sensitive topics, and South Africans are also generally free to engage in private conversations of a political nature without being harassed (Matiza & Slabbert, 2020; Misago, 2017).

A notable point here is that in 2016, a report by the UN Human Rights Commission expressed concerns about the government's use of the surveillance and regulatory oversight law RICA<sup>39</sup>. In September 2019, the High Court found parts of the RICA law

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<sup>39</sup> *Regulation of Interception of Communications and Provision of Communication-Related Information Act (RICA)*

unconstitutional because, among other things, it did not have sufficient safeguards to prevent the abuse of intercepted private communications between citizens by state authorities. Fortunately, this issue was actively addressed by the South African National Assembly, which set a two-year timeframe to rectify the flaws (De Villebois Castelyn et al., 2020; Ramluckan & Patrick, 2021). In February 2021, South Africa's Constitutional Court confirmed the Regulation of Interception of Communications and Provision of Communication-Related Information Act (RICA) to be unconstitutional.

Overall, South Africa has a better country image and reputation on the international stage than Malaysia, particularly in terms of political rights and civil liberties. Unlike Malaysia's rejection of a dual citizenship policy, South Africa has a dual citizenship policy. South Africans who acquire citizenship of another country abroad can retain their South African citizenship simultaneously, at least where the laws and policies of the other country allow it. Foreigners who come to South Africa and wish to acquire South African citizenship need to gain permanent residency first and then have at least five years of residence in South Africa to apply for South African citizenship (Manby, 2016a; Moosa, 2021).

Combined with discussion of regime type, the single citizenship policy, which aims to preserve a cohesive and well-regulated national character, is a manifestation of Malaysia's partly free status and its rigorous political climate. However, South Africa's stronger democratic institutions and observance of civil liberties support a dual citizenship strategy that fosters individual autonomy and interconnectedness with the rest of the world. Reflecting the government's larger approach to keep control, Malaysia's single citizenship policy might be considered as a technique to unite national loyalties and discourage political dissent. The policy conforms with other limiting policies restricting political involvement and freedom of expression. On the other hand, South Africa's dual citizenship approach emphasises its democratic principles and supports personal autonomy as well as worldwide involvement. Complementing South Africa's dynamic media scene and engaged civil society, this strategy supports the nation's dedication to political liberties and human rights. To put it briefly, political backdrop and regime type affect citizenship policies of Malaysia and South Africa. The dual citizenship policy of South Africa supports democratic values and emphasises the need of personal liberties. By contrast, Malaysia's approach of issuing only single citizenship is appropriate for its constrained political setting. These laws show how government structures affect the shared perspective of a society towards citizenship,

therefore impacting political rights and civil liberties.

Similarly, the citizenship policies of Malaysia and South Africa are deeply influenced by their political stability and governance. Malaysia's single citizenship policy is a reflection of its efforts to maintain political stability in a context of limited political rights and civil liberties. By restricting dual citizenship, Malaysia aims to consolidate national loyalty and prevent potential sources of political and social instability. In contrast, South Africa's dual citizenship policy underscores its robust democratic governance and political stability. The policy promotes personal freedom and international engagement, reflecting South Africa's confidence in its political institutions and the resilience of its democratic processes. The ability to hold multiple citizenships aligns with South Africa's broader commitment to human rights and its positive international standing.

The differing citizenship policies have broader implications for political rights, civil liberties, and national identity. Malaysia's single citizenship policy, while aimed at maintaining stability, may limit individual freedoms and international mobility. It reflects a governance approach that prioritizes control and uniformity in a context of moderate political freedom. Conversely, South Africa's dual citizenship policy enhances personal autonomy and fosters international ties. It is indicative of a governance model that values inclusivity, diversity, and robust democratic practices. This policy aligns with South Africa's broader efforts to uphold human rights and maintain a positive image on the global stage. Overall, the analysis of citizenship policies in Malaysia and South Africa reveals how political stability and governance shape national approaches to citizenship, as well as the impact of country image and regime type on the citizenship policy. Malaysia's single citizenship policy is aligned with its efforts to maintain control in a partly free political environment, while South Africa's dual citizenship policy reflects its democratic values and stable governance. These policies illustrate the broader relationship between country image and citizenship rights, involving elements of regime type and political stability and governance.

The following chapter continues the analysis of the limited roles of human capital (H2), emigration (H8), and immigration (H7) in the association with citizenship policy. The next chapter also presents a summary of the associations between citizenship policy and hypothesised factors.

## **CHAPTER 9**

### **COMPARISON BETWEEN COUNTRIES (II)**

This chapter continues to analyse the factors of human capital (H2), emigration levels (H8), and immigration levels (H7), which play a limited role in the association with citizenship policy. As in Chapter 8, there is a qualitative comparison of two countries, one with a single citizenship policy and one with a dual citizenship policy. Qualitative analysis can help to contextualise the country and better understand the relationship between individual factors and the way the country's citizenship policy plays out in practice. Additionally, it adds nuance to the previously established statistical patterns. In general, the factors of human capital and emigration levels have minimal associations with the country's chosen citizenship policy. And immigration levels have almost no effect on citizenship policy.

#### **9.1 The Limited Role of Human Capital**

H2 indicates that higher human capital favours having a dual citizenship policy. Countries use dual citizenship policies as a strategic policy to attract foreigners and their own people abroad to come back with their knowledge and thus stimulate the economic development of their home country. However, statistical analysis yields the following findings: First, a country's overall economy (measured by the GDP) has almost no relationship with dual citizenship policies. Second, human capital refers to the population number as well as people's knowledge and skills. However, there is a strong correlation between the education index and the percentage of the population aged 65 or older. This study removes the indicator of the percentage of the population aged 65 or older to eliminate the problems caused by the co-linearity in the statistical analysis. At the same time, the education index is more consistent with the theories and concepts in our theoretical framework (i.e., hypotheses). This chapter's qualitative analysis now examines the size of the workforce, a component of human capital. We can see whether the number of workers, as part of human capital, influences the kind of citizenship policies a country adopts. The ageing population indirectly reflects the number of workers, indicating the availability of a workforce.

Tanzania is a country with relatively mild demographic issues which uses a single citizenship policy, and Australia is a country with relatively severe demographic issues

which uses a dual citizenship policy. The United Republic of Tanzania, commonly known as Tanzania, is located in East Africa. Since independence, Tanzania has been socially stable, with an average annual population growth rate of 3.7%<sup>40</sup> since 2000, making it one of the fastest-growing countries in East Africa with the largest land area (Sunguya et al., 2019). According to World Population Prospects (2015), half of the world's population growth between 2015 and 2050 will be concentrated in nine countries, including Tanzania, whose population will increase to at least five times its current size by 2100 (United Nations, 2015, cited in Zhang and Chen, 2017).

More than 44% of the Tanzanian population is under 15 years of age, and this is because Tanzania has one of the highest birth rates in the world with a total fertility rate of 5.01 children per woman, which is the 17th highest in the world (The US CIA (Central Intelligence Agency), 2020; United Nations Department of Economic and Social Affairs, 2020). Tanzania has a shallow median age, with over 44.8% of the population being under 15 years of age, 52% of the population being between 15 and 64 years of age, and 3.1% of the population aged 64 years or above. Looking at the median age, we can see that Tanzania has a very high number of young and middle-aged people, and thus a vibrant middle-aged and young labour force. On the other hand, its senior citizens are not very numerous. The percentage of the Tanzanian population aged 65 or over has remained between 1% and 5% since 1970. Although this is a relatively similar phenomenon across Africa, it has to be acknowledged that the ageing of the population in Tanzania is very slight. Coupled with a booming birth rate, Tanzania's senior citizens form a tiny part of the society (Statista, 2021). Currently, Tanzania's population is still increasing, with the UN World Population Prospects estimating that the total population of Tanzania now stands at around 58.01 million, compared to an estimated 51.48 million in 2015. Tanzania's population will likely swell to 100 million in the next ten or so years (the UN, 2019).

Due to such a wealth of human capital, Tanzania has not faced many demographic problems. It neither needs to worry about a future shortfall in its population, nor does it currently need to worry about a labour shortage or the impacts of an ageing society. As H2 suggests, Tanzania does not have much incentive to implement a dual citizenship policy; indeed, in practice, it uses a single citizenship policy. Tanzanian citizenship is governed by the Tanzania Citizenship Act, Chapter 357 (Revised Edition of 2002) and

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<sup>40</sup> Calculated from data provided by the UN World Population Prospects 2020.

its Regulations of 1997. Currently, Tanzanian nationality law does not allow its citizens to hold other foreign countries' citizenship, except in the case of Tanzanian women acquiring foreign citizenship through marriage, or persons under 18 who receive Tanzanian citizenship by birth or descent. Citizens will automatically lose their Tanzanian citizenship at 18 unless they renounce all other citizenship (Kamazima, 2018).

In contrast, Australia has a high index of population ageing. It is not extremely high, but it comfortably exceeds the criteria defining an "ageing society". The Commonwealth of Australia, or Australia for short, covers an area of 7,692,000 square kilometres and is located between the South Pacific and Indian Oceans, surrounded by sea on all sides, making it the only country in the world to cover an entire continent (EBSCO Publishing (Firm), 2009a). Australia has an ageing population that is consistently old in global terms. Between 1950 and 1980, the proportion of the Australian population aged over 65 ranged from 5% to 10%, compared to 1% to 5% or even less in most countries around the world at that time (the World Bank, 2020e). From 1985 until 2015, Australia's population aged 65 and above (% of the total population) reached between 10% and 15%, making it an internationally recognised "ageing society or country". After 2015, and to date, the country's percentage of the population aged 65 or over has exceeded 15%, fluctuating between 15% and 20%. In the most recent year available - 2019 - Australia's Population Aged 65 and Above (% of Total Population) was as high as 16% according to the World Bank (2020).

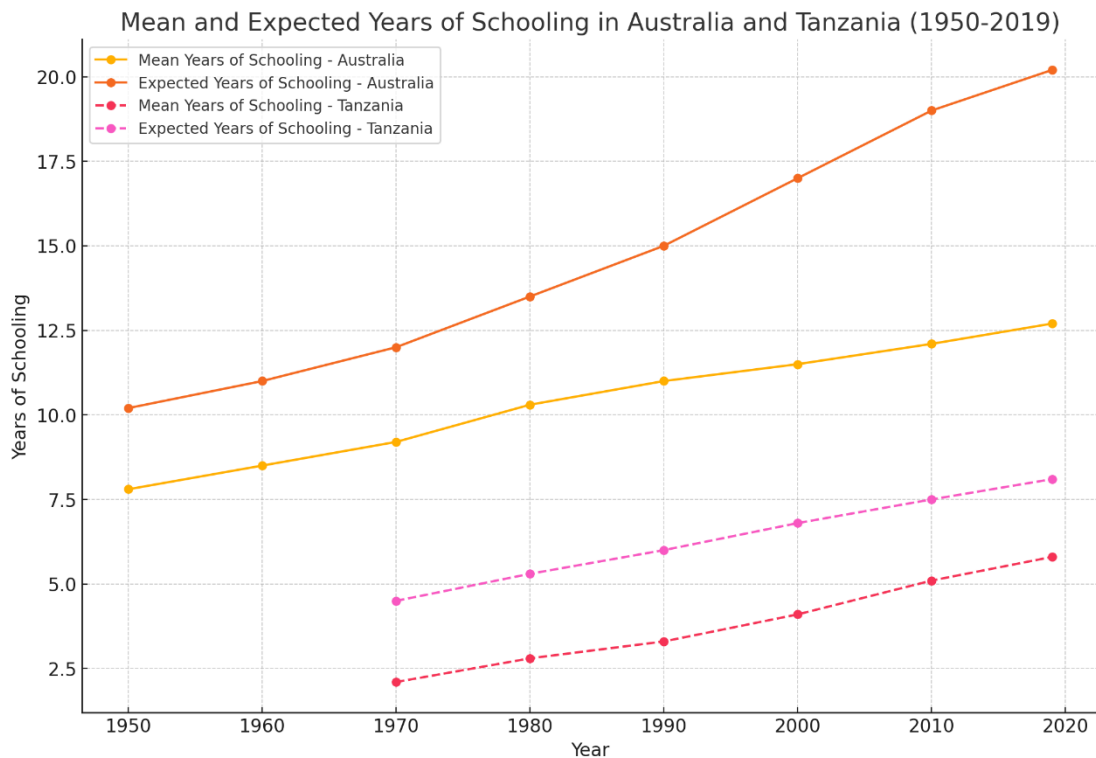
Australia's population snowballed in the two decades after World War II, with censuses recording over 7.5 million people in 1947, 13 million in 1966, and 15.6 million in 1986 (Luck et al., 2011). However, from the 1970s onwards, population growth slowed. The main reason for this was Australia's chronically low birth rate - Australia has had an average of only two children per woman and a low mortality rate in recent years. In the meantime, Australia's good overall development (including but not limited to economy, education, the environment, etc.) has brought about a longer life expectancy. Australia's life expectancy is now 79.7 years for men and 84.2 years for women. The combination of low birth rates and high longevity have contributed to the significant ageing of the population in Australia (Ambrey et al., 2018; O'Loughlin et al., 2017). Although Australia has highly encouraged higher fertility, it has had little success. This has forced the Australian government to attract people from abroad to ensure population growth (Klapdor et al., 2009; O'Loughlin et al., 2017). As described

in H2, having a dual citizenship policy is one way of solving such a problem. In practice, Australia has progressively adjusted its dual citizenship policies and laws, for example, in 1958, 1973, and 2002, both to allow Australians to become citizens of other countries through voluntary acts without losing their Australian citizenship, and to allow foreigners to become Australian citizens through a specific naturalisation process (Klapdor et al., 2009).

By means of average and expected years of education, the education index provides information on population educational performance and potential. Australia's educational scene has undergone amazing transformation during the last seven decades. Starting with a mean of 7.8 years of education in 1950, the figure rose gradually to 12.7 years by 2019. Likewise, throughout the same era the predicted years of schooling rose from 10.2 to 20.2 years, as Figure 9.1 shows (UNDP, 2020). Australia's strong post-World War II economic development made large educational sector investments possible. This increasing trend was much aided by the application of thorough public education programmes including free basic and secondary education (Marginson, 1993). Over many years and programmes, following Australian governments have given education first importance. Among notable initiatives are the Australian Qualifications Framework and significant support for tertiary and vocational education. Moreover, the focus of society on education and the link between career possibilities and educational results has contributed to produce a society that respects lifetime learning and skill development (Partridge, 2014; Shah et al., 2011).



**Figure 9.1: Mean and Expected Years of Schooling in Australia and Tanzania (1950-2019)**



Data Source: Human Development Report 2020: The Next Frontier: Human Development and the Anthropocene

Tanzania's educational path, on the other hand, displays the difficulties common of poor countries even if it shows improvement. The predicted years of schooling range from 4.5 to 8.1 years; the mean years of education changed from 2.1 in 1970 to 5.8 in 2019 (UNDP, 2020). Tanzania underwent colonising between 1945 and the 1960s. Education was not easily available, especially for indigenous Tanzanians. Education policies favoured the colonial elite (Yahl, 2015). Tanganyika became independent in 1961 (later joining Tanzania in 1964). Under socialist ideas of President Julius Nyerere, the government emphasises on increasing access to education (Wedgwood, 2007). Although infrastructure and quality remained problems, universal primary education was underlined throughout through the 1970s and 1980s. Tanzania's government has maintained striving to improve access to and quality of education from the 1990s forward with considerable foreign aid and legislative changes (Green, 2014).

When comparing Australia and Tanzania, the single citizenship policy of Tanzania is based on its historical, social, and economic foundation; education is thus highly

significant in establishing this posture. Post-independence Tanzania under Julius Nyerere emphasised national unity and coherence to forge a strong national identity (Lal, 2012; Nyerere, 1972). Aiming to eliminate fragmented loyalties and promote a shared national character, the single citizenship policy was fundamental in this vision. Characterised by low mean and projected years of schooling, the somewhat low Education Index implies difficulties in general distribution of civic education. Lowering educational levels of a population could make them more prone to divide and less able to negotiate the complexity of several allegiances, therefore supporting the inclination for a single citizenship policy.

Apart from that, Tanzania gives policies that support national solidarity and economic stability top priority given a growing economy and limited resources (Kamazima, 2003; Saul, 1974). Though it shows slow development, the Education Index nevertheless remains somewhat low when compared to developed countries. This implies that many Tanzanians lack the advanced knowledge required to participate actively in a globalised economy, therefore complicating the management of dual citizenship. The emphasis on single citizenship helps to guarantee that people stay committed to national development projects instead of looking for possibilities overseas that can compromise home success. Dealing with dual citizenship calls for strong administrative and judicial systems to handle difficult problems such legal jurisdiction, conscription, and taxes. According to the Education Index, Tanzania's educational system may not currently provide the wide advanced abilities required to construct and maintain such highly developed administrative structures (J. Blatter et al., 2009; Green, 2014). A single citizenship policy streamlines government and aligns with the nation's current administrative capabilities.

In contrast, Australia's dual citizenship policy is influenced by its advanced educational achievements, robust economy, and socio-cultural dynamics. Australia, with a high Education Index reflecting substantial mean and expected years of schooling, has a well-educated populace capable of navigating the intricacies of dual citizenship. Australia's multicultural policies and global integration initiatives (Banks, 2015; Rubenstein, 2007) are supported by this educational basis, which also makes dual citizenship a realistic and good policy. Using dual citizenship for international trade, cultural interaction, and worldwide networking, the educated worker can help to contribute to national wealth (Dahlin & Hironaka, 2008b).

Australia's high degree of human development—shown by its Education Index—

helps explain why it would gain from dual citizenship. Dual citizenship helps educated people participate in cultural interactions, scientific research, and international business as well as other activities. This approach so promotes economic growth by letting people keep ties and operate in several nations, hence fostering innovation and economic expansion (Betts, 2002; Hugo, 2014) Last but not least, Australia's superior education system generates experts in law, public administration, and international relations (Shah et al., 2011). This capacity enables the efficient management of dual citizenship, therefore addressing possible problems with two allegiances using advanced legal frameworks and administrative tools. The strong Education Index shows Australia has the people resources required to sustain.

Through a qualitative comparative analysis of Tanzania and Australia, we can see that the relationship between human capital and citizenship policies in the two countries appears to be consistent with the results of our correlation analysis and partial regression analysis (Model 1). However, it does not match the regression results of Model 2. Hypothesis 2 receives evidence from different directions and is not statistically significant; in statistical analysis, we can also see that the link between human capital and citizenship policies is weak.

Partial regression analysis (Model 2) suggests that countries with higher education index are more likely to have dual citizenship policy. It could be understood that in countries with a higher education index, single citizenship policies may be preferred to cultivate a unified national identity and ensure the allegiance of highly educated citizens. One instance is Japan. Due to a well-established and strict educational system, Japan claims among the best education indices worldwide. The OECD (2020) reports that a sizable share of Japan's population holds tertiary education degrees, therefore reflecting high rates of educational achievement for the country. The country's dedication to education is shown in its large expenditures in curriculum development, teacher preparation, and educational infrastructure (MEXT, 2019). Culturally, Japanese society strongly values education. The idea of "gakureki shakai," (academic credentials society), emphasises the need of academic accomplishment as a determinant of social and professional standing (Kariya, 2012). This cultural focus generates a competitive and goal-oriented atmosphere that motivates pupils to perform academically outstanding.

Japan's single citizenship policy is enshrined in its Nationality Act, which stipulates that Japanese nationals cannot hold dual citizenship beyond 22 years old

(Surak, 2008). Historically, this approach developed from a need to preserve a homogeneous national identity and to steer clear of the complications related to double loyalty (Davies et al., 2010). The single citizenship law supports a strong, cohesive national identity. According to Sugimoto (2014), the policy is to foster loyalty and belonging only for Japan, therefore strengthening their bond. In a society that prizes social harmony and group well-being above individualism, this feeling of identity is vital.

The high education index of Japan guarantees a consistent flow of highly educated and talented people. The single citizenship policy helps to match national development objectives with these educational results. The policy, as Tani (2016) contends, motivates people to use their knowledge and abilities towards the social and economic growth of their country, hence cultivating responsibility and loyalty. Apart from that, one important way that Japan's single citizenship policy advances national progress is by reducing brain drain. If emigrating permanently entails losing their Japanese citizenship, highly educated people are less likely to do (Bosio, 2023; Harding, 2019). This retention of talent guarantees that the advantages of Japan's educational system stay within the nation, therefore supporting local innovation and national economic development. Apart from imparting knowledge and abilities, the Japanese educational system fosters national pride and loyalty. Essential courses on Japanese history, culture, and moral education abound on the syllabus, therefore bolstering the values and identity connected with Japanese citizenship (Yumoto, 2017). By legally attaching people to a common national identity, so guaranteeing a united allegiance, the single citizenship policy complements this educational focus.

In the business world, one can clearly see how citizenship policies and education line up. Many of the top Japanese corporations, including Toyota and Sony, gain from a highly educated workforce driven especially towards national progress. Bosio (2023) points out that the country's citizenship policies help to nurture the dedication and loyalty of their employees, which in turn helps to explain some of the technological innovations attained by these businesses. In the public sector, too, the dedication of highly educated people to national goals is impressive. The single citizenship policy of Japan guarantees that public servants and researchers concentrate their activities on projects benefiting the nation. Prime illustrations of how national devotion drives major technological advancement include the Shinkansen (bullet train) project and Japan's developments in robotics and artificial intelligence (Parmenter, 2004).

Although Japan's single citizenship concept has obvious advantages, it also presents difficulties in a world going global. Given the linked global economy of today, which depends more on international cooperation and the cross-border mobility of talent than ever before, the policy might restrict both of these areas. Still a major policy issue is how to balance the advantages of worldwide involvement with the demand for a cohesive national identity (S. Chen, 2020; Harding, 2019). Overall, together with its high education index, Japan's single citizenship policy essentially fosters a cohesive national identity, guarantees the loyalty of highly educated people, and guides their abilities towards national growth. Rooted in historical and cultural settings, this policy framework shows a special way in which education and citizenship can be coordinated to accomplish national objectives.

The analysis of Tanzania and Australia shows that countries respond to the citizenship policy with different degrees of population crises. Human capital has an impact on countries' political stability and ability to deal with dual citizens. Whether dual citizenship policies can be used to develop its economy also changes with the degree of human capital in the country. The comparison between Tanzania and Australia shows that when countries face population problems and labour shortages, they tend to accept dual citizenship policies. Australia, with a high education index, also has a dual citizenship policy because a high level of education brings high political stability and government capacity, as well as helping the country develop with the intelligence of the population. Despite some statistical results suggesting a slight negative relationship between human capital and dual citizenship policies, Japan, a country with a high level of education, has adopted a single citizenship policy to foster national cohesion and utilize its highly educated population.

In general, we should not blindly follow the results of statistics. Through qualitative case comparisons, we see more fine-tuning behind the numbers. We have learned that, in combination with the unique background of each country, the factors that affect citizenship policies do not exist independently. When the factor is weakly related to the citizenship policy, it is likely that the factor is related to other factors that are more closely related to the citizenship policy, thereby indirectly affecting a country's choice of citizenship policy. It seems that human capital is not as strongly related to citizenship policies as it is assumed to be. The influence of human capital on a country's citizenship policy is very limited and very dependent on the unique background of the country and the complex interconnections with other factors.

## **9.2 The Limited Role of Emigration**

The statistical analysis shows that emigration levels have a positive correlation with the dual citizenship policy, but the regression analysis reveals that they have a tiny negative relationship; that is, countries with high emigration levels are more likely to have a single citizenship policy. This section will compare Laos and Italy to see how such a relationship plays out in practice. While the inclusion of Italy in both the comparison with Laos and as a stand-alone case study may seem a bit unusual, it is crucial to understand that while the horizontal analysis presents one scenario, the vertical analysis reveals another. The comparison with Laos reveals that the statistical analysis uses the most recent year to investigate the continued existence of this relationship. Through the single case study of Italy, in contrast, we can see how time changes lead to changes in the social-political context and, therefore, influence the varying aspects of citizenship policy. The various analytical perspectives reveal different relationships between emigration levels and citizenship policy. The previous analysis provided mixed evidence, supporting different directions in the relationship between emigration levels and citizenship policy. This, in turn, demonstrates the very limited role that emigration levels play in relation to dual citizenship policy.

Laos has relatively high emigration levels, and it has a single citizenship policy. In contrast, Italy has relatively low emigration levels and has a dual citizenship policy. The two countries have similar emigration levels but have very different citizenship policies. Combining these two countries' actual socio-political backgrounds, we can see how the results of statistical analysis play out in practice. The Lao People's Democratic Republic, commonly known as Laos, is a socialist country located in the south-central peninsula of Southeast Asia. With an area of 236,800 square kilometres and a population of 7.16 million (Government of Laos, 2019; the World Bank, 2020a), Laos is the only landlocked country in Southeast Asia, bordered by Vietnam to the east, Cambodia to the south, Thailand and Myanmar to the west, and China to the north (Government of Laos, 2019). Laos has a single citizenship policy; it does not recognise nor allow dual citizenships (Law of Laotian Citizenship, 1990).

The level of emigration from Laos has always been relatively high. Between 1990 and 2019, emigration from Laos as a percentage of the national population was 1990 (11%), 1995 (11%), 2000 (12%), 2005 (16%), 2010 (19%), 2015 (19%), 2019 (19%). The global average emigration as a percentage of the national population for the same

period is 1990 (10%), 1995 (10%), 2000 (11%), 2005 (11%), 2010 (12%), 2015 (14%), and 2019 (14%) respectively. It can be seen that the level of emigration from Laos has always been at a high level in the world. The reasons for this are complex. We can start by looking at the total population of the Lao PDR country. According to 2019 statistics, Laos has a population of 7 million and a land area of 240,000 square kilometres. The global average population density is 47 people per square kilometre, while Laos's population density is 29 people per square kilometre, which is significantly lower (the World Bank, 2020d; United Nations Department of Economic and Social Affairs, 2020). The UK, Uganda, and Romania, which have the similar land area as Laos, have population densities of 256, 147, and 86, respectively. Thus, it is evident that Laos's population density is much lower than that of other countries with the same land area and far below the world level. If we calculate the emigration rate as the percentage of emigrants in the total population at this low total population level, a significant emigration rate could easily emerge. It is even more apparent that Lao's country's population before was even lower: 4,258 thousand in 1990, 4,846 thousand in 1995, 5,324 thousand in 2000, 5,752 thousand in 2005, 6,249 thousand in 2010, 6,741 thousand in 2015, and 7,169 thousand in 2019. Although the population of Laos is already deficient at the world level (even in the last year of its consistent rise: 2019), it has been increasing. The emigration rate in Laos has also been growing, which shows the vast number of emigrants from Laos.

Furthermore, let us look at the component of the number of emigrants - why do a certain number of Laos's people want to move away? Firstly, the country's economic situation and economic model does not support its people to earn more money to develop themselves or their families in order to improve their economic situation. The Laos economy is predominantly agricultural. It has a tropical monsoon climate with long hours of sunshine and good rainfall, making for good agricultural development conditions (Menon, J., Warr, 2013). However, the country's industrial base is weak. Most of its mineral resources are unexplored, with major deposits including gold, silver, copper and iron, potash, bauxite, and zinc (Hirota, 2018). According to the World Bank's Business Environment Report (2020), Laos is ranked 154th out of 190 economies (countries) in the world in terms of investment ease. This indicates that Laos is a difficult place to undertake various business activities.

The country's business environment is challenging both for national businesspeople and foreign companies. For example, Vientiane, the capital city of Laos,

which has the largest population, is ranked 181st globally in terms of the ease of starting a business, 144th for obtaining electricity, 179th for the protection of minority investors, 157th for taxation, 161st for the ease of contract enforcement and 168th for bankruptcy protection (World Bank, 2019). Many of the business rules, monitoring, and regulatory mechanisms are detrimental to business activities of all types and thus prevent Laos's people from doing better for themselves or their families (Sricharoen, 2020; Wisaijorn, 2012). It is natural, then, that they would choose to leave the country to live in an environment more conducive to success. This situation increases the number of emigrants from Laos.

The combination of a small total population and a huge number of emigrants has resulted in a consistently high emigration rate from Laos. Such a high emigration rate is bound to threaten the country's very foundations. A dual citizenship policy would mean more people are potentially going to leave the country, and a dual citizenship policy does not necessarily attract more people as many may be wary of the Lao PDR's less-developed economic model and low friendliness to foreign business. In contrast, having a single citizenship policy is a safer bet, as people must choose only one citizenship. Most Lao people will choose citizenship in Laos based on their familiarity with their place of birth, ethnicity, family, and national culture (Castles, 2017; M. P. Vink et al., 2013). The single citizenship policy will retain some of the Lao population to some extent.

Furthermore, the situation of Laos concerning its neighbours should be put into perspective. The mainstay of Laos's industrial economy is hydropower. Over 60% of the Mekong River's hydropower reserves are in Laos, and there are over 20 rivers of over 200 km across the country (Hirota, 2018). Laos has established economic and trade links with neighbouring countries through electricity transmission and rail transport (BBC News, 2012; Janssen, 2019). Looking at Laos's neighbours, Bangladesh is smaller than Laos, with a population of 160 million and a population density of over 1200, Malaysia has a population of 32 million and a population density of 96, and the Philippines has a population of 100 million and a population density of 350. Even Cambodia, which is much smaller than Laos, with only 180,000 km<sup>2</sup>, has a population of 15 million and a population density of 90, compared to Laos' 240,000 km<sup>2</sup> and only 7 million (the World Bank, 2020d, 2020a). If Laos had a dual citizenship policy, a high emigration rate would be likely, resulting in more Lao people leaving the country. This is a considerable threat, given the strength of its neighbours. When the populations of



the surrounding countries are robust, the low-density country may struggle in geopolitical terms. Laos is facing such a situation.

At the same time, foreigners may not necessarily come to live in Laos if Laos has a dual citizenship policy. The Mekong River flows through Laos, the mountains have been washed by rain for many years, and the complex terrain of the valleys, with their precipitous cliffs and rampant flooding, is not suitable for large groups of people. The only land in Laos suitable for living and reproducing are the plains of the lower Mekong and southern regions, which account for only 20% of the country's total area. The vast majority of the Lao people live in 20% of the country's territory (Government of Laos, 2019). Thus, 7 million people live in 20% of the country's territory of 240,000 km<sup>2</sup>. The living area is overcrowded. Once again, a dual citizenship policy does not seem very necessary. A single citizenship policy appears to be a more sensible option to plug the gap in the high emigration rate.

Compared to Laos, Italy has a relatively low emigration rate, and the country has a dual citizenship policy. The Italian Republic, commonly known as Italy, is a sovereign European country, consisting mainly of the boot-shaped Italian peninsula in southern Europe and the two Mediterranean islands of Sicily and Sardinia (Scarzanella, 2018). The level of emigration from Italy is one of the lower levels in the world between 1990 and 2019, based on the emigration data provided by United Nations Population Division Department of Economic and Social Affairs. During 1990-2019, emigrants from Italy as a percentage of the national population fluctuated between 4% and 6% (UN Population Division Department of Economic and Social Affairs, 2019; United Nations Population Division Department of Economic and Social Affairs, 2020). Italy's emigrants as a percentage of the national population has been as follows at different times: 1990 (6%), 1995 (6%), 2000 (5%), 2005 (5%), 2010 (4%), 2015 (4%), and 2019 (5%), in comparison with the world average of the emigrants as a percentage of the national population at the same time: 1990 (10%), 1995 (10%), 2000 (11%), 2005 (11%), 2010 (12%), 2015 (14%), and 2019 (14%) (UN Population Division Department of Economic and Social Affairs, 2019; United Nations Population Division Department of Economic and Social Affairs, 2020). It is clear to see that the level of emigration from Italy has been at a low level in the world, unlike Laos, which, as discussed earlier, has been at a high level in the world. In practice, Italy has a dual citizenship policy with a relatively low level of emigration.

Italy's total population level is in a situation of little change between 1990 and 2019. Although there is an increase in the total population, the growth is tiny. This may be related to Italy's high population ageing and low marriage and childbearing rates. The total number of people in Italy from 1990 to 2019 is 1990 (57,048 thousand), 1995(57,174 thousand), 2000 (56,692 thousand), 2005 (58,281 thousand), 2010 (59,325 thousand), 2015 (60,578 thousand), and 2019 (60,550 thousand) respectively (United Nations Population Division Department of Economic and Social Affairs, 2020). Italy's emigration rate is in a less variable state. We can find the fact that emigrants from Italy has also been rising modestly only (occasionally fluctuating up and down but with a tiny, almost negligible amount of change) (UN Population Division Department of Economic and Social Affairs, 2019).

Italy has had a dual citizenship policy since 1992. Data on emigration provided by the United Nations Population Division, Department of Economic and Social Affairs, show that although the level of emigration from Italy has been lower than the world average since 1990, the difference between Italy's emigration level and the world average is not very large, only four per cent in 1990 (UN Population Division Department of Economic and Social Affairs, 2019). By 2019, the difference between Italy's emigration level and the world average was almost 10%. Between 1990 and 2019, the difference between the level of emigration from Italy and the world average of emigration increased (United Nations Population Division Department of Economic and Social Affairs, 2020). As we can see, the level of emigration from Italy has been falling continuously since the country adopted the dual citizenship policy.

With the dual citizenship policy in place, Italians living abroad may be more inclined to invest in property, businesses, or other ventures in Italy if they reclaim or reaffirm their Italian citizenship (Cook-Martín, 2013). For foreigners (not originally Italian) who acquire Italian citizenship, dual citizenship also makes it easier and smoother to carry out relevant economic activities in Italy, whether buying an asset or setting up a business that helps the Italian economy (Cook-Martín, 2013). Italians living abroad can send money back home to their families. While this is not exclusive to those with dual citizenship, the legal rights and ties affirmed by the dual citizenship policy can strengthen this channel (O. W. Vonk, 2012). In addition, dual citizens can act as a bridge between Italy and their other countries of citizenship, facilitating trade, partnerships, and business links. This can expand markets for Italian products and services, contributing to Italy's economic development (Harpaz & Mateos, 2018). As

the economic situation at home improved and local economic opportunities increased, the need for people to emigrate in search of better economic opportunities reduce (Jansen & Goverts, 2020; Peters & Vink, 2023).

Furthermore, although the 1992 policy made it easier for the descendants of Italian emigrants to claim Italian citizenship, it mainly benefited those living abroad (Bianchi, 2011). The policy can be seen as a recognition of the Italian diaspora rather than an incentive for modern Italians to emigrate. The recognition of dual citizenship may have strengthened ties between Italy and its diaspora, fostering a sense of global belonging among Italians worldwide (Bianchi, 2011; Schlenker et al., 2017). Italians abroad can act as informal ambassadors, increasing Italy's cultural outreach to the outside world. Meanwhile, the Italian diaspora can encourage friends and extended family to visit Italy, increasing Italy's tourism revenues (Schlenker et al., 2017). Dual citizenship gives individuals the flexibility to work and live in both countries. Such labour mobility can help address labour shortages in specific sectors in Italy or provide opportunities for Italians to gain experience abroad and return with enhanced skills. In addition, as dual citizens acquire skills, training, and experience abroad, these can be transferred back to Italy if they decide to return or engage in business ventures that involve both countries. This can lead to the introduction of new technologies, business practices and other innovations in Italy (Schierup et al., 2008).

Compared to Laos, which has a high emigration rate and faces many threats if the country has a dual citizenship policy, Italy is more comfortable with a dual citizenship policy. Moreover, moderate levels of emigration bring benefits to Italy, such as a boost to the national economy, labour force flexibility, knowledge exchange and innovation (such as the introduction of new technologies). Laos is more compatible with the single citizenship policy than it is at present: because even if the country adopts the dual citizenship policy, as analysed in the previous paragraphs, it will be very difficult for Laos to attract foreign investment to help develop the country's economy; instead, more people from the country may seek economic development abroad, which is unfavourable for Laos; and secondly, even if many people come to Laos because of the dual citizenship policy, it will be difficult for Laos to accommodate or provide suitable accommodation for these dual citizens due to geographical constraints. Thus, from the above analysis, we can see that countries with relatively high emigration levels can have a single citizenship policy, and countries with relatively low emigration levels could have a dual citizenship policy, as a very tiny statistical relationship suggests.

### **9.3 An Enquiry into the Immigration**

The statistical results show a weak relationship between immigration levels and citizenship policy. Although the strength of the association is minimal and nearly has no impact, the direction of the association suggests that it contradicts our hypothesis. Nevertheless, the finding is not a negative one. It does not prove the hypothesis, but it shows the theory's limitations.

There is a literature review and theory to support the logic of the hypothesis that countries with low immigration levels are more likely to have a dual citizenship policy, but there is a discrepancy when it comes to empirical evidence. A country with a low level of immigration being in favour of dual citizenship policies could make sense in reality. Suppose a country has high levels of immigration. These high levels of immigration represent a large number of immigrants, who perform their duties and functions in many aspects of the country. In one way, it can be argued that this country does not have to worry too much about the level of immigration, as the immigration level is already high. Even though immigrants are by their nature flexible and mobile, they may leave the country at any moment; the country does not have to worry too much about incoming immigrants going to other countries or returning to their home countries, given the large number of existing immigrants as a basis. This high level of immigration is already in the country.

Dual citizenship policies tend to be more proactive in attracting more foreigners to live and work in a country. Yet, if the country already has a large percentage of immigrants, there could be better insurance policies to encourage these immigrants to stay in the country. Dual citizenship policies have greater risks in other ways, such as neighbouring country relations, political correctness, and others. Therefore, for countries with high levels of immigration, a dual citizenship policy is not the only option. They may choose other, safer policies to retain the large numbers of immigrants already present in the country (Yanasmayan, 2015). Hence, we now have a situation where countries with high immigration levels could have a single citizenship policy. In contrast, countries with low immigration levels may have a dual citizenship policy.

Austria has a high level of immigration and a single citizenship policy. Turkey has a slightly lower level of immigration (but not much lower than Austria's) and a dual citizenship policy. This is in line with the results of the numeral analysis above. The fact that these two countries do not have vastly different immigration levels but have

two different citizenship policies explains the small value of the coefficient. Overall, the factor of immigration levels shows a weak association with the citizenship policy.

The Republic of Austria, often referred to as Austria, is a landlocked country in Central Europe<sup>41</sup>. Austria shares borders with several countries: Hungary and Slovakia to the east, Italy, and Slovenia to the south, Liechtenstein and Switzerland to the west, and Germany and the Czech Republic to the north. The capital and largest city is Vienna. Thanks to the Alps, Austria is a mountainous country, with only 32% of its territory below 500 metres above sea level, and its highest point at 3,798 metres (Parker, 2014). Austria is a representative democracy with a parliamentary system (König et al., 2015). It is one of the wealthiest countries in the world today, with a gross national product per capita of US\$50,114 in 2019 (the World Bank, 2020c). The Human Development Index ranked it 18th in the world in 2019. Austria has been a member of the European Union since 1995 and is a founding member of the OECD. It signed the Schengen Agreement in 1995, accepted it in 1999, and adopted the Euro as its currency in 2002. Historically, Austria was a central part of the Habsburg dynasty that ruled much of Central Europe from 650 to 1918. The country is ethnically part of the Germanic people's settlement area. It is a German-speaking country, along with Germany, Switzerland, and Luxembourg (Economist Intelligence Unit (Great Britain) & Thomson Gale (Firm), 1986; König et al., 2015).

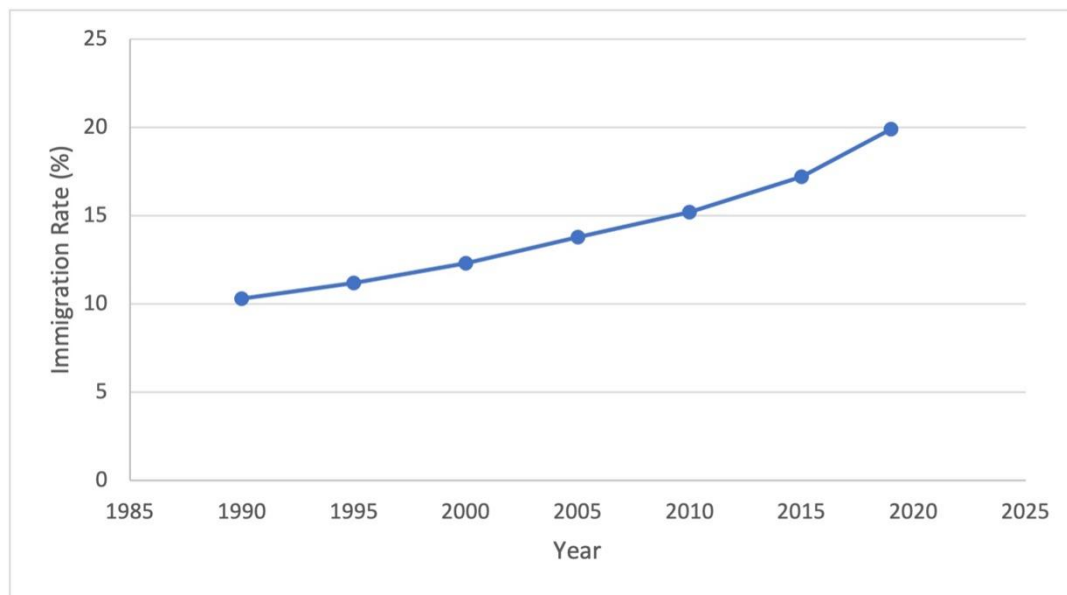
Austria has always had a high level of immigration. From the 1990 records<sup>42</sup> of the United Nations Department of Economic and Social Affairs Population Division, as Figure 9.2 indicates, the percentage of immigrants to Austria as a percentage of the country's total population was 10.3%. In those days, this was a relatively high level in the world. Between 1995 and 2005, the level of immigration to Austria also remained at a high level in global terms, fluctuating between 11 and 14 per cent and increasing gradually. After 2010, Austria's immigration rate exceeded 15% and remained on a steadily increasing trend until the latest figure of 19.9% in 2019 (UN Population Division Department of Economic and Social Affairs, 2020). Overall, Austria's immigration levels have always been in the medium to high range in global terms.

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<sup>41</sup> Historically, it has also been classified as a sovereign state in both Western and Eastern Europe.

<sup>42</sup> The United Nations Department of Economic and Social Affairs Population Division provides the latest immigration data from 1990 to 2019.

**Figure 9.2: The Percentage of Immigrants to the Total Population of Austria**



Source: United Nations Department of Economic and Social Affairs Population Division, International Migration database (2019).

Austria's consistently high rate of immigration can be attributed in part to its high level of development in many areas. As was described at the outset, it has a democratic system of government that most people prefer. The country is in a developed region, i.e., Europe. Although it is a landlocked country surrounded by many other countries, it has friendly relations with its neighbours, which are also developed and affluent countries, and mostly EU members<sup>43</sup> (Parker, 2014). Austria's strong economic development and its focus on human rights and human development have, of course, led many foreigners to want to come to the country. As a result, the rate of immigration to the country has always been relatively high.

In more detail, Austria has many aspects as a country of residence or destination that attract foreigners to live and work there. Many foreigners consider Austria a pleasant country to live in and a worthwhile destination. Healthcare in Austria is universal and accessible, covering most health problems and medications. The treatment is generally of high quality and efficient. In fact, its healthcare is so highly regarded that many people will travel to Austria to seek medical care and pay for it out of their own pockets (The European Observatory on Health Systems and Policies (a

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<sup>43</sup> Austria has a neighbouring country, Switzerland. Although Switzerland is not a member of the European Union, Austria has peaceful relations with it (Gerber et al., 2010).

Partnership hosted by WHO), 2018). Crime is rare, and violent crime is even rarer; there are usually fewer than 100 murders per year in the country. By comparison, Israel, with a similar population, had 123 murders in 2017 (Glasner et al., 2018; Grafl et al., 2012). Of course, minor crimes, such as pickpocketing, can happen anywhere. However, in terms of severe criminal cases, Austria's crime and safety situation are much better than many other countries of similar size (Gerber et al., 2010; Glasner et al., 2018). In addition to health and safety considerations, Austria is also very favourable in terms of personal development. The Austrian education system is of high quality and well-developed. The population is well educated, and the country offers free general, pre-school, and public primary and secondary education. Students can choose between vocational and academic schools. In addition to this, all Austrian and EU students have free access to Austria's public universities. Even for non-EU students, fees at public universities are meagre, usually between €1,000 and €2,000 (although a German language requirement is a prerequisite) (Pilz et al., 2022; Unger et al., 2021).

Regarding transport, buses, trams, and subways operate widely within the country. Because of its privileged inland location as a geographical hub, people living in Austria can easily visit Germany, Switzerland, or any of the other six countries on the Austrian border. People can also easily travel to various European destinations by train or plane (Black, 2015). Concerning cultural and outdoor activities, Austria's world-class museums, opera houses, as well as its range of options such as forest hikes, mountain climbing, and skiing in winter, mostly brought by its location in the Alps, all attract foreigners to this pleasant country. Austria also ranks highly in terms of press freedom, women's rights, and human rights (Ajanovic et al., 2018). Overall, due to its unique geography, easy access to travel and transport, and high-quality healthcare and education, Austria is a desirable place for immigrants to come.

Because Austria has always had a high rate of immigration, and even though these immigrants fulfil a vital role in the country in all walks of life, Austria does not have to worry too much about these people leaving. Through the three decades from 1990 to 2019, immigrants have not left on a large scale but rather have steadily increased. The incentive to have dual citizenship policies to retain these immigrants is therefore not high. After all, dual citizenship is a more proactive and multifaceted policy (taking into account relations with neighbouring countries, the satisfaction of people in the country, the educational level of newly naturalised people, etc.). Austria could implement more conservative policy options to preserve the high percentage of the existing immigrant

population, for example in terms of maintaining the country's existing good image and infrastructure. In reality, Austria maintains a single citizenship policy.

The Republic of Austria was founded in 1955, and the current Austrian Citizenship Act was first implemented in 1965 and then revised in 1985 to reflect gender equality<sup>44</sup>. The Act was revised numerous times between 1986 and 2019, including in 1993, 1994, 1997, 1998, 2006, 2013, and 2019, yet there has been no change in the restriction of holding no more than one citizenship (Ajanovic et al., 2018). An Austrian citizen who has acquired another citizenship by voluntary action automatically loses his or her Austrian citizenship. The exception is where prior permission to retain Austrian citizenship has been obtained; however, this may be difficult to obtain, as the legislation aims to reduce the number of dual citizenships granted. Importantly, an application to retain Austrian citizenship must be made before acquiring another citizenship. Otherwise, when a person acquires foreign citizenship, his or her Austrian citizenship will automatically be lost (Citizenship Act, 2019).

In contrast, the immigration levels in Turkey are relatively low and Turkey has a dual citizenship policy. The Republic of Türkiye, commonly known as Turkey, is a country straddling two continents, Europe and Asia. It is bordered by the Black Sea to the north, the Mediterranean Sea to the south, Syria and Iraq to the southeast, the Aegean Sea to the west, Greece and Bulgaria also to the west, and Georgia, Armenia, Azerbaijan, and Iran to the east. Between the Anatolian Peninsula and Eastern Thrace are the Bosphorus, the Sea of Marmara, and the Dardanelles, the only waterways connecting the Black Sea to the Mediterranean (EBSCO Publishing, 2019; Hendek, 2019). Turkey has been committed to joining the European Union since the 1980s. However, the EU rejected Turkey's application for membership for several considerations, such as disputes over Cyprus, political instability, geopolitical considerations and so forth. Cyprus has been a member of the EU since 2004, but the island is divided between the Republic of Cyprus (the EU member state) and the Turkish Republic of Northern Cyprus, which is only recognised by Turkey. This situation has led to political and territorial disputes that have further complicated Turkey's EU membership (Findley, 2010). Also, the EU requires political stability from its member states, and there have been periods of significant political instability in Turkey. This includes an attempted military coup in 2016 and the subsequent

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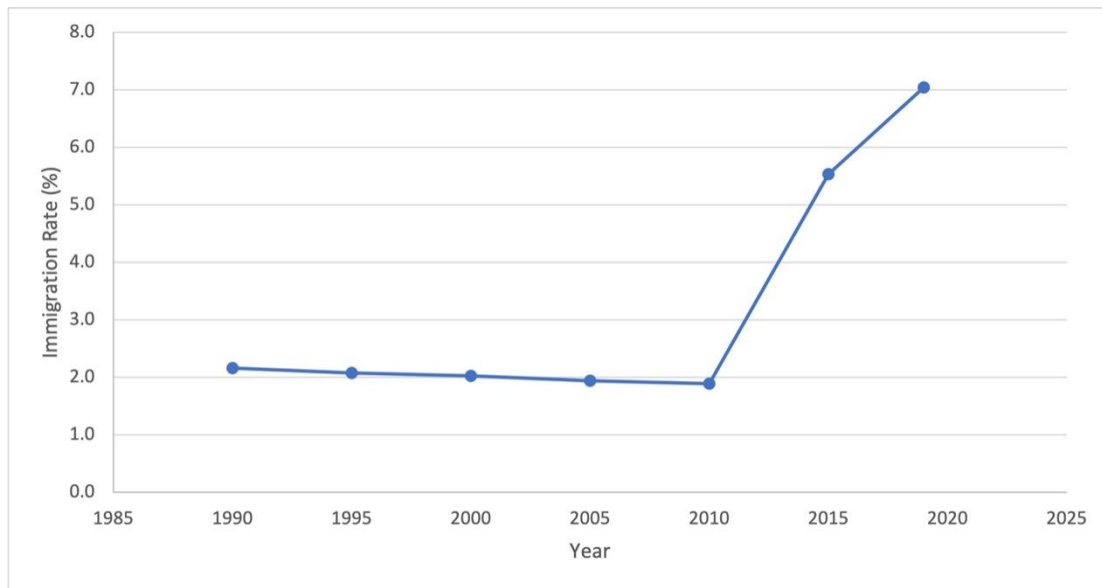
<sup>44</sup> This introduced symmetry for the acquisition of citizenship by either partner through marriage.



crackdown on perceived political opponents by the Turkish government (Zuconi & SpringerLink, 2020). Furthermore, there are ongoing discussions within the EU about the union's future expansion and the geopolitical implications of including countries like Turkey. Some EU member states are wary of expanding the union too quickly or too widely for fear of overstressing its resources and diluting its political cohesion (Keyman & Gumuscu, 2014; Reiners & Turhan, 2021a).

Immigration in Turkey has always been at a low level. As Figure 9.3 shows, since 1990, when the United Nations' Department of Economic and Social Affairs Population Division, International Migration database first recorded it, until 2010 the percentage of immigrants in the total population of Turkey was at around 2%. Since 2010, there has been a rapid increase in the rate of immigration to Turkey. In 2015 it rose to 5.5%, and in 2019 it rose to 7.0%. Although this is a significant increase for Turkey, the rate of immigration to the country is still low compared with other countries or at the global level (United Nations Department of Economic and Social Affairs, 2020). Furthermore, the rapid increase in immigration in 2010 in Turkey was largely due to the refugee crisis underway at the time. A large number of people arrived in Turkey in the 2010s. From 2014 to 2019, Turkey received the largest annual number of registered refugees of any country or region, and according to the United Nations High Commissioner for Refugees (UNHCR), Turkey has the largest refugee population in the world (UNHCR The UN Refugee Agency, 2019). The majority are refugees from the Syrian civil war, numbering 3,591,892 as of June 2020 (United Nations High Commissioner for Refugees, 2020). In 2018, the UNHCR reported that Turkey hosted 63.4% of all "registered Syrian refugees" (UNHCR, 2019).

**Figure 9.3: The Percentage of Immigrants to the Total Population of Turkey**



Source: United Nations Department of Economic and Social Affairs Population Division, International Migration database (2019).

Although the immigration rate in Turkey has always been low, Turkey has always had a policy of allowing its citizens to have dual or multiple citizenships. Turkish citizenship is defined in Article 66 of the Turkish Constitution 1982 (as amended on October 17, 2001). Everyone who shares a citizenship bond with the Turkish state is a Turk. Citizenship can be obtained under the conditions outlined by law and can only be lost in situations specified by law. No Turk will lose their citizenship unless they do something which goes against their loyalty to the country (Constitution of The Republic Of Turkey, 1995; Gönenç, 2004). The Turkish Citizenship Act No. 5901 permits dual and multiple citizenship. It provides that a person may acquire Turkish citizenship by descent regardless of the citizenship he or she may have acquired at birth (e.g., Turkish citizenship is granted when a child has one parent born in Turkey and one parent born abroad). The automatic acquisition (or retention) of foreign citizenship does not affect Turkish citizenship. There is no provision in Turkish law requiring citizens born with dual citizenship to choose one citizenship over the other when they reach adulthood. Dual citizens are not required to use a Turkish passport to enter or leave Turkey. Travel with a valid foreign passport (or national identity card for certain citizens) and a Turkish national identity card are permitted; the only requirement is that the Turkish Government requires those applying for another citizenship to notify the relevant

Turkish authorities (for example, the nearest Turkish embassy or consulate abroad)<sup>45</sup> (Turkish Citizenship Law No. 5901, 2009).

The situation regarding the immigration rate and citizenship policy in Turkey reveals that Turkey is not a country with a high rate of immigrants, where immigration plays an essential role in all aspects of the country. Immigration to Turkey has never been very high. Even though it has increased sharply since 2010, the percentage of immigrants coming to the country is not high. Immigration does not seem to be a factor that encourages Turkey to have a dual citizenship policy. In the case of Turkey, immigration is not the incentive the hypothesis in this thesis suggests.

Instead, in the case of Turkey, the dual citizenship policy seems to have been driven by other considerations, such as the desires to join the EU and to increase economic development. Turkey has been trying to join the EU since the 1980s. To do so, it needs to be in line with the outlooks of (most) EU countries, in areas such as respect for human rights, the right of people to live in and leave any country freely, and the right to have citizenship of more than one country (Reiners & Turhan, 2021b). EU membership would give Turkey a much larger economic market. Greater competition can lead to greater efficiency in a larger market. There are no barriers to protecting inefficient businesses within the EU. The free trade brought by the EU means that the goods and services produced in Turkey can compete in any part of the market. The factors of production in Turkey can move to where they can be used more efficiently - not just within a country but between countries (Avcı & Çarkoğlu, 2013; Bee, 2017). Turkey's dual citizenship also shows that it pursues strong economic development. The 2018 update of Law No. 5901 again reflects this. Foreigners can be granted the right to apply for Turkish citizenship through their investments (Presidency of the Republic of Turkey Investment Office, 2018). Therefore, Turkey's dual citizenship policy could be more related to factors other than immigration levels.

Overall, there is a weak correlation between immigration levels and citizenship policies: countries with high immigration levels could have single citizenship policies, while countries with low immigration levels is able to have dual citizenship policies. Austria has always had a high level of immigration. Migrants living there play many different roles in all aspects of the Austrian state. However, in contrast to using a dual

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<sup>45</sup> By providing the original naturalisation certificate, a Turkish birth certificate, a document proving completion of military service (male), a marriage certificate (if applicable) and four photographs.

citizenship policy to retain these large numbers of immigrants and to maintain their role in Austria, Austria seems to be attractive to these immigrants due to other aspects of the country itself, such as its excellent geographical location, sound healthcare and education systems, and emphasis on human rights and welfare. Because of these aspects, Austria has maintained a steady and high rate of immigration. In contrast, having a dual citizenship policy carries more considerations and risks (e.g., relations with neighbouring countries, the opinions or satisfaction of citizens in the country, religious diversity, etc.). Accordingly, having a dual citizenship policy is not a necessary or compulsory option for Austria, unlike what H7 suggests. In practice, Austria has a single citizenship policy. In contrast, even though there has been an increase since 2010, Turkey's immigration rate is still low. If, as H7 suggests, Turkey does not need to overthink the role of immigration in its affairs, then it should have a single citizenship policy. However, in reality, Turkey has a dual citizenship policy. The dual citizenship policy in Turkey could be more related to other aspects such as its ongoing desire to join the EU or to increase its economic development. Therefore, the statistical analysis rejects H7, which suggests that high immigration levels support a dual citizenship policy. The comparison between Austria and Turkey demonstrates the practical application of these statistics. Future analyses are necessary to confirm the relationship between emigration levels and citizenship policy.

## **Conclusion**

The policies pertaining to citizenship are demonstrably linked to the nature of relations with neighbouring countries and the country's historical experience of colonisation. The relations between countries are frequently characterised by the simultaneous occurrence of trade, the exchange of human capital, the movement of labour, and migration. Countries with amicable relations with their neighbours tend to adopt dual citizenship policies, as they are less concerned about the potential threat posed by other countries. Furthermore, friendly, and peaceful relations facilitate communication and exchanges, whether political, economic, or cultural. Consequently, the implementation of a dual citizenship policy is a reassuring and mutually beneficial measure for both neighbouring countries with positive relations.

In accordance with the tenets of historical institutionalism, countries that have a historical legacy of colonialism are more likely to implement policies pertaining to dual citizenship. One could consider dual citizenship policies as a pragmatic reaction to the

complicated socioeconomic links and migration patterns moulded by colonial legacies. Such countries may be better placed to regulate migration, stimulate economic growth through remittances and investments, and maintain strong ties with their diasporas by recognising and allowing their citizens to hold dual affiliations. The adoption of dual citizenship policies also indicates an awareness of the historical and contemporary realities of globalisation, in which transnational identities and loyalties are increasingly prevalent.

After that, physical capital and country image are two relevant factors for a country's choice of citizenship policy. Dual citizenship policies can be a strategic tool for countries to attract more foreign investment, thereby aiding their development. Furthermore, countries with a favourable national image use dual citizenship policies to project a positive image of their country and fulfil their national commitments. At the same time, because of their positive national image, these countries can increase their soft power and international prestige. This study, which uses the indicator "Global Freedom Scores" to measure a country's political rights and civil liberties, often reflects regime type, political stability, and governance in a country's positive image. The higher the degree of freedom within a country, the more tolerance, openness, and pluralism it will have. A country with a democratic regime, political stability, and effective governance often tends to have a dual citizenship policy.

The impact of human capital, emigration levels, and immigration levels on a country's citizenship policy is limited. These factors may be linked to other factors that are more closely linked to the citizenship policy, thereby influencing a country's choice of citizenship policy in an indirect way. Therefore, these factors can have varying relationships with the dual citizenship policy depending on the situation. Future research is deserving to sort out the relationship between these factors.

The following chapter, Chapter 10, presents a single case study of Italy. It observes the changes in Italy's social and political environment through the changes in the timeline, thereby attempting to identify any potential relationships between them and Italy's changing citizenship policies.

## **CHAPTER 10**

### **THE CASE STUDY OF ITALY**

The preceding statistical analysis revealed the relationship between the variables (and control variables) of this study and citizenship policies. The subsequent qualitative comparative analysis places these figures into real-life context. In conjunction with the national context, it examines how these figures operate in real life. The case study of Italy will provide a longitudinal perspective on how changes in the political and social environment in Italy over time have led to changes in its citizenship policies. Italy's dual citizenship policy represents the dominant type of citizenship policy globally. The transition from a single citizenship policy to a dual citizenship policy represents the most prevalent change in citizenship policy globally.

Section 10.1 sets out the essential information and background about Italy and the process through which Italy's 1992 citizenship legislation introducing a dual citizenship policy was adopted. Section 10.2 explains the main reasons for Italy's adoption of a policy of dual citizenship, namely emigration, evolving social norms (i.e., country image), and relations with neighbouring countries. Section 10.3 discusses the de facto bias of the Italian dual citizenship policy towards compatriots of Italian descent, making it a de facto "conditional" dual citizenship policy, although the legal provisions give citizens equal rights to dual citizenship. The final section presents a summary of the single case study of Italy.

#### **10.1 Italy and Its Dual Citizenship Policy in 1992**

This section illustrates the essential information and background about Italy and the process through which Italy's 1992 citizenship legislation (introducing a dual citizenship policy) was adopted. The Italian Republic was established on 2 June 1946 comprising mainly of the boot-shaped Italian peninsula in southern Europe and the two Mediterranean islands of Sicily and Sardinia (Lucarelli, 2015; Schierup et al., 2008). It is located in the central Mediterranean Sea, shares land borders with France, Switzerland, Austria, and Slovenia, and includes small enclaves such as the Vatican City and San Marino. It also has a territorial enclave in Switzerland known as Campione (Nangeroni et al., 2023; The World Factbook, 2021). Italy covers a total area of 301,230 square kilometres, with a population of over 60 million. It is the third most populous

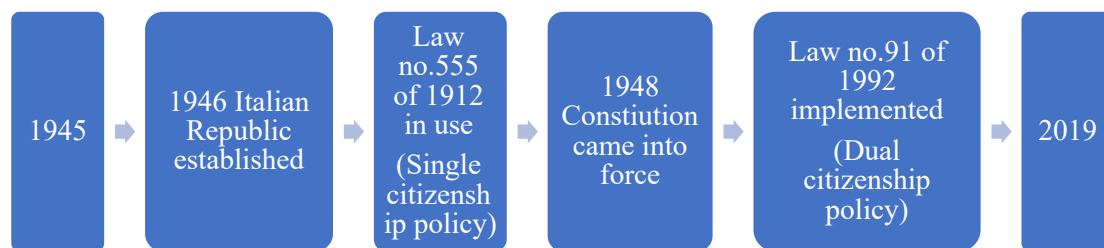
member state of the European Union, the sixth most populous country in Europe, and the tenth largest country in terms of land area on the continent (the World Bank, 2020d; United Nations Department of Economic and Social Affairs, 2020). It has a developed economy and ranks highly in terms of life expectancy, quality of life, healthcare, and education (IMF Database, 2020; Statista, 2022; The Economist Intelligence Unit, 2006; the World Bank, 2020c). Italy is a founding and leading member of the European Union and is also a member of numerous international bodies, including the United Nations, NATO, the OECD, the G7, the Latin Union, the Schengen Area, and many more (Abbondanza, 2016; Bindi, 2011). Italy is a unitary state with a republican form of government republic, which means that political power is vested in and entrusted to the Parliament with confidence by its electorate (Smyth, 1948).

Italy's single and dual citizenship policies are both based in legislation. According to the country's Constitution, Italy's legislative structure adopts a model of equal bicameralism. This means that Parliament, which is the legislative body of the state, has two Houses (the Chamber of Deputies (*Camera dei Deputati*) and the Senate of the Republic (*Senato della Repubblica*)) that are independent from one another but which possess the same rights and powers. Parliament is vested with legislative power. The government has executive authority. The judiciary is independent and exercises judicial powers (Nangeroni et al., 2023). In the general legislative process in Italy, legislation can be initiated by members of the Houses of Parliament, the government, organisations and bodies empowered by constitutional law (for example, the National Council for Economics and Labour (*CNEL*)), or directly by the people (through a proposal made by at least 50,000 voters (Article 71, Constitution)).

The Italian Constitution regulates that the legislative function must be exercised jointly by the two Houses of Parliament (Article 70). Accordingly, for a bill to become law, an identical text must be approved by both the Chamber of Deputies and the Senate. The law-making procedure is divided into the following stages: 1) Introduction of a bill (legislative initiative); 2) Approval by the House before which it is first presented; 3) Transmission of the text to the other House for approval in the same form or with amendments; 4) Possible "shuttling" (*navette*) between the two Houses of the text amended several times until it is approved by both the Chamber and the Senate in exactly the same form; 5) Promulgation by the President of the Republic, who has the power to refer bills back to Parliament for reconsideration; 6) Publication in the Official Journal; and 7) Entry into force (Gubitosi et al., 2021).

Italy's citizenship provisions are based on Law no. 555 of 1912 and Law no. 91 of 1992. Law no. 555 of 1912 did not allow citizens to hold multiple citizenships, which means it was a single citizenship policy, while Law no. 91 of 1992 allows citizens to have multiple citizenships, which makes it a dual (multiple) citizenship policy (Ministero degli Affari Esteri e della Cooperazione Internazionale, 2022). Another critical point in this procedure is that Italy's Constitution came into force on 1 January 1948. It sets out the basic principles of individual and civil rights and duties, and affirms the equality of all citizens (including both sexes) (Chamber of Deputies, 2022). The time framework or timeline of citizenship policies in Italy is set out in the Figure 10.1.

**Figure 10.1: Timeline of Italian Citizenship Policies (1945-2019)**



Holding dual or multiple citizenships was prohibited by Law no. 555 of 1912. It determined that a man or woman, being of competent legal age (21 years if before 10 March 1975 or 18 years if after 10 March 1975<sup>46</sup>), who of his or her own volition naturalised in another country and resided outside of Italy, would lose his or her Italian citizenship (Article 8, Law no. 555 of 1912)<sup>47</sup>. The only two exceptions to this were the State's permission regarding the child of an Italian male citizen abroad: if the child was

<sup>46</sup> Italy decreased the age at which a person is considered an adult from 21 to 18, as stated in Law no. 39 of March 8, 1975, which came into effect on March 10, 1975. Prior to this date, any Italian citizen who had not yet turned 21 years old was considered a minor.

<sup>47</sup> Italian citizen women married to Italian citizen husbands could not lose their citizenship if the husband's Italian citizenship was retained (Article 10, Law no. 555 of 1912).



born in a country abroad, and this country followed the principle of *jus soli*<sup>48</sup>, then the child of an Italian male citizen was allowed to have two citizenships, regardless of whether the child was a boy or a girl (Article 7, Law no.555 of 1912). Additionally, if an Italian widow married again, the offspring of that marriage could continue to be citizens of Italy (Article 12, Law no. 555 of 1912).

The bill (no. 1460) regarding Law no. 91 of 1992 was proposed to the Senate of the Republic on 13 December 1988, as an initiative of the Minister of Foreign Affairs Mr Giulio Andreotti (DC party<sup>49</sup>), and with the participation of the Minister of the Interior Mr Antonio Gava (DC party), the Minister of Justice Mr Giuliano Vassalli (PSI party<sup>50</sup>), and the Minister of Defence Mr Valerio Zanone (PLI party<sup>51</sup>) (Presidenza del consiglio dei ministri, 2023). The Senate of the Republic approved the bill (with amendments) on 23 May 1991. All the major parties supported the bill in the Senate, specifically in favour on behalf of the Group Sen Acone Modestino (PSI<sup>52</sup>), Sen Pontone Francesco (MSI-DN<sup>53</sup>), Sen Spetic Stojan (Rif comunista<sup>54</sup>), Sen Toth Lucio (DC), Sen Galeotti Menotti (Com-PDS<sup>55</sup>)<sup>56</sup> (Senato della Repubblica X Legislature, 1991; X Legislatura, 1992).

After that, the bill was transmitted to the Chamber of Deputies. During the Commission meeting, the components of the Commission which was in charge of examining the bill voted unanimously in favour of the bill: “those present and voting – 28 MPs<sup>57</sup>; voted yes – 28 MPs, voted no – 0 MP. The Commission approves, that is, the Chamber of Deputies, approved the bill on 14 January 1992” (Camera dei Deputati & Commissioni in sede legislativa, 1992; Camera dei Deputati, 1912). The President signed the bill on 5 February 1992. Then, the bill was publicised in the *Gazzetta Ufficiale* on 15 February 1992 (Repubblica Italiana, 1992). Law no.91 of 1992 came

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<sup>48</sup> *Jus sanguinis* is a principle of citizenship or citizenship law by which citizenship is determined or acquired by the citizenship or ethnicity of one or both parents. *Jus soli* is another rule of law by which a child's citizenship is determined by his or her place of birth, also known as birthright citizenship.

<sup>49</sup> The DC party is the Christian Democracy Party, which positions itself at the centre of the political spectrum.

<sup>50</sup> The PSI party is the Italian Socialist Party, at the centre-left to the left wing.

<sup>51</sup> The PLI party is the Italian Liberal Party, at the centre to centre-right of the political spectrum.

<sup>52</sup> T PSI is the Italian Socialist Party, at the centre-left of the political spectrum.

<sup>53</sup> MSI-DN indicates the alliance of the Italian Social Movement party and the National Democracy Party, on the far-right & right-wing respectively of the political spectrum.

<sup>54</sup> The Rif comunista is the Communist Refoundation Party, on the left-wing to far-left of the political spectrum.

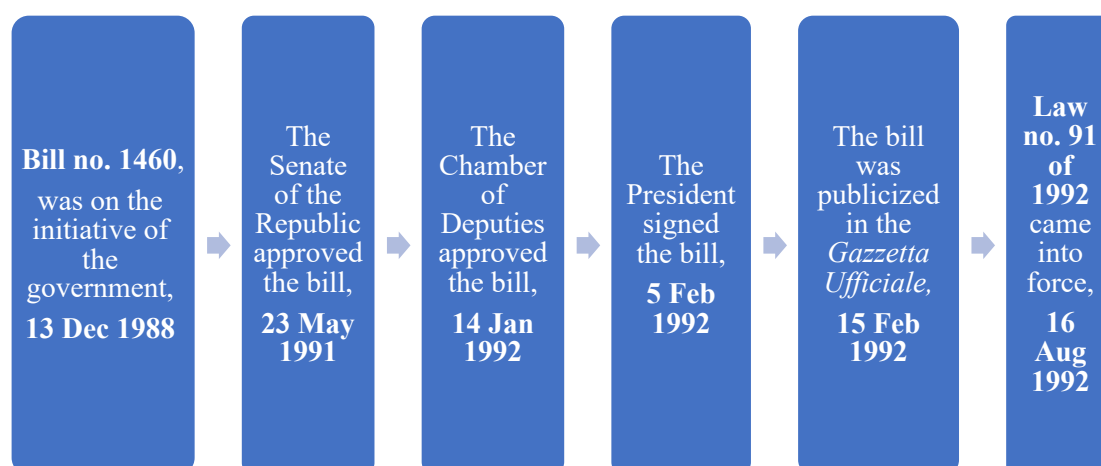
<sup>55</sup> The Com – PDS is the Democratic Party of the Left Party, on the centre-left of the political spectrum.

<sup>56</sup> An explanation of the vote was given at the A524 sitting of the Assembly on 23<sup>rd</sup> May 1991.

<sup>57</sup> MPs means members of Parliament.

into force in 16 August 1992 (Presidenza del consiglio dei ministri, 2023). Figure 10.2 summarises the legislative process of the Italian dual citizenship policy (law), from Bill no. 1460 to Law no. 91/1992.

**Figure 10.2: From Bill no. 1460 to Law no. 91 / 1992 (Dual Citizenship Policy)**



Legislature X of Italy lasted from 2 July 1987 until 22 April 1992. There are 323 seats in the Senate of the Republic (the upper house) and 629 in the Chamber of Deputies (the lower house) (Senato della Repubblica, 2023). In the Senate of the Republic, the DC party, the PCI<sup>58</sup> party, and the PSI<sup>59</sup> party held the majority of seats. Their percentages were 39.9%, 22.9%, and 13.9%, respectively. They were followed by the SI<sup>60</sup> party and the MSI<sup>61</sup> party, which held 4.6% and 4.6% of the seats in the Senate of the Republic (Senato della Repubblica, 2023). In the Chamber of Deputies, the DC party held 37.2% of the total seats, the PCI-PDS<sup>62</sup> party held 23.7%, and the PSI party held 15.9% of the seats. These three parties held most of the seats in the Chamber of Deputies. The MSI party followed them with 5.2% and the PRI<sup>63</sup> party with 3.2% (Camera dei Deputati, 1992b). When the bill was proposed (13 December 1988), the

<sup>58</sup> The PCI is the Italian Communist Party, on the left-wing of the political spectrum.

<sup>59</sup> The PSI is the Italian Socialist Party, at the centre-left of the political spectrum.

<sup>60</sup> The Independent Left (SI) was an Italian parliamentary group in the Italian Senate between 1968 and 1992, on the left-wing of the political spectrum.

<sup>61</sup> The Italian Social Movement (MSI) was a neo-fascist political party in Italy, on the far-right of the political spectrum.

<sup>62</sup> The alliance of the Italian Communist Party (PCI) and the Democratic Party of the Left (PDS) was on the left-wing and centre-left of the political spectrum.

<sup>63</sup> The Italian Republican Party (PRI) is at the centre of the political spectrum.

Government was led by Ciriaco De Mita (DC party). The Government was composed of five parties: the Christian Democracy (DC) party, the Italian Socialist Party (PSI), the Italian Democratic Socialist Party (PSDI), the Italian Liberal Party (PLI), and the Italian Republican Party (PRI). When the two Chambers approved the bill, the President of the Government (i.e., the Prime Minister) was Giulio Andreotti (DC Party) (The President of the Council of Ministers et al., 2023).

## **10.2 Explaining the Existence of the Dual Citizenship Policy in Italy**

Italy's dual citizenship policy was primarily motivated by the objective of maintaining contact with Italian citizens residing abroad (i.e., emigrants) and preserving national sentiment. In addition to this, the colonial experience also contributed to the factor of emigration, as these individuals often had connections with countries that had previously been involved in colonial relations with Italy. Furthermore, Italy's dual citizenship policy also sought to advance national expansion with “free colonies”.

The advent of social norms and the dissemination of global norms saw Italy embark on a trajectory of gender equality and the advancement of civic rights, particularly with the implementation of the *Constitution 1948*. This phenomenon is consistent with the concept of the "country image" as defined in our theoretical framework. The state has granted its citizens a greater range of political and civic rights, as well as greater equality and freedom. In addition to emigration, which emphasises national sentiment and the legacy of a colonial past, the advancement of social norms (i.e., the country's image) is also a factor that has promoted Italy's dual citizenship policy.

Relations with neighbours is another reason that influence Italy to have the dual citizenship policy, especially Italy is one of the EU (and its predecessors)'s member states. Italy's friendly relations with its neighbours make it more comfortable and secure to accept a dual citizenship policy, which also promotes cooperation and common development between countries. Concomitantly, the policy's contagion effect is evident in the EU, where regional dynamics are particularly pronounced. Italy has adopted a dual citizenship policy as a member of the EU with the objective of promoting regional integration, political and economic integration, and the management of migration flows. Those who are citizens of EU member states are the second most privileged group in Italy's dual citizenship policy, after compatriots who live abroad.

### 10.2.1 Emigration

According to Tossi (1991) (Com-PDS party), Strik (1991), Acone (1991 (PSI party), Pontone (1991) ((MII-DN party), Italy's decision to establish a dual citizenship policy was primarily motivated by the desire to strengthen its ties with the Italian diaspora and to facilitate the acquisition of citizenship for the children of Italian expatriates (Senate of Republica and Legislature, 1991). Italy was a country of emigration from 1945 until the end of the 1970s. Emigration from Italy peaked in the 1950s and 1960s, but still continued at a steady rate throughout the rest of the period, with millions of Italians leaving the country over the course of several decades (Calvanese & Pugliese, 1988). Many Italians left in search of better economic opportunities abroad, particularly in the United States, Canada, and countries in South America and Europe (Wirth, 2015). Some Italian emigrants also chose countries to move to in North and East Africa. These latter countries are geographically close to Italy and were colonised by Italy, with examples including Libya, Eastern Somalia, and Eritrea. Some Italians will have had links to these countries; their ancestors may have worked in these countries, and therefore, they come to work and live in these countries themselves (Paoletti, 2011). This emigration had a significant impact on Italy - economically, socially, and in terms of its human resources.

The diaspora maintained strong ties with their homeland and often expressed a desire to maintain their Italian identity and citizenship. However, prior to the adoption of the dual citizenship policy, Italians who acquired citizenship in another country were legally required to renounce their Italian citizenship. This caused frustration and dissatisfaction among them, as they were forced to choose between their new country and their ancestral homeland (Calvanese and Pugliese, 1988; Tossi 1991, cited in Senate of Republica and Legislature, 1991; Schlenker, Blatter and Birka, 2017; Scarzanella, 2018). But more importantly, the Italian state itself wants to maintain contact with these descendants of Italians abroad.

#### *Nationalist / sentimentalist familismo*

As outlined by Koenig-Archibugi (2003), Italy has historically been a nation in search of a state. The concept of the Italian State was founded upon the idea of the nation (Koenig-Archibugi, 2003; O. Vonk, 2012). Italy has been Europe's primary country for emigration. During the period known as the "Great Migration" when Europeans were moving to countries outside of Europe, the primary destinations for Italian emigrants were Argentina, Brazil, and the United States. Nevertheless, a nearly same number of

Italian emigrants stayed in Europe. Between 1876 and 1915, about 6 million Italians travelled to various European countries, with France, Germany, and Switzerland being the primary destinations. During the same time frame, approximately 7.3 million Italians went to nations located outside of Europe. Between 1876 and 1895, Argentina and Brazil emerged as the primary choice for Italian immigration, attracting over a million individuals from Italy. During the period from 1895 to 1915, there was a significant surge in the number of Italian emigrants heading to the United States. The number rose from 450,000 between 1876 and 1895 to about 3.7 million between 1895 and 1915 (Vecoli, 2002). While the first perception of losing people may seem like a decline, the various Italian communities scattered across the globe became a subject of shared worry, ultimately strengthening the belief that the unification of Italy was securely established (Lonni, 1993). The significant emigration on a big scale resulted in a greater sense of unity among those who stayed behind and reduced tensions and disputes. This was because they were seen by their fellow countrymen as a symbol of the solidarity of a new nation (Weil, 1789, p. 186 cited Lonni, 1993, p. 32).

It has been argued that there is a contention that there was an unbreakable connection with Italians living abroad, to whom Italy owed a moral obligation because it was unable to provide them with a future in their home country. The concepts of nationalist “familismo” and nationalist expansionism have maintained their strength over time, but the resistance against emigration has rapidly diminished in its influence. The nationalist concept of “familismo”, which strongly resonated with Italian feeling, would ultimately have a significant impact on the development of Italian citizenship policies.

Prior to the enactment of the 1992 Italian citizenship legislation, the country's citizenship policy consistently favored co-ethnicity. Concurrently, the Italian citizenship law's family model ensures that the preference for Italian descendants will always be maintained. Dual citizenship was not permitted under the 1865 Civil Code, yet it was tolerated in practice due to some exception of descents, Article 11(2) of the *Civil Code of 1865* explicitly banned dual citizenship. Children of Italian emigrants who obtained another citizenship via birthright should have technically lost their Italian identity. However, they were informally permitted to maintain their Italian citizenship due to the prioritisation of the principle of bloodline (*jus sanguinis*) as stated in Article 4 of the *Civil Code of 1865*. Moreover, according to Article 6 of the *Civil Code of 1865*, it was stated that if a parent had renounced their Italian citizenship before the birth of

their kid, then the child would be considered a foreigner. However, if a kid meets certain requirements, they can still acquire Italian citizenship by establishing their permanent residence in Italy.

The primary purpose of the 1912 Act was to preserve Italian citizenship for Italian emigrants in response to the significant emigration known as the “Great Migration”. This implies that individuals who have Italian citizenship by bloodline (*jus sanguinis*) can transmit their citizenship without any limitations. Additionally, individuals who have another citizenship by birthright (*jus soli*) can likewise have dual citizenship. The uncertainty regarding the stance on dual citizenship was exacerbated by the wording of Article 7 of the 1912 Act. While the law theoretically did not allow for dual citizenship, in reality, it did. The article stated that Italians born abroad who also held the citizenship of their country of birth could renounce their Italian citizenship upon reaching adulthood. Therefore, there was no requirement to do so. Furthermore, the interpretation of Article 8 would result in the existence of dual citizenship, as it allowed individuals to retain Italian citizenship even if they gained foreign citizenship unintentionally. Consequently, numerous articles were formulated in a manner that provided significant leeway for interpretation, so affording Italian policy makers numerous chances to enable emigrants and their offspring to maintain Italian citizenship (O. Vonk, 2012).

It can be seen that, before the dual citizenship policy of 91/1992, Italy had always reserved a space for dual citizenship for its compatriots and their descendants abroad, although this space was limited and unclear. The dual citizenship policy of 1991/1992 continued this tradition, with the preferential treatment of dual citizenship reserved for the Italian co-ethnics and more clearly defined in law. While the provisions indicate that the dual citizenship policy may also result in equal treatment for foreigners seeking naturalisation, in practice, these foreigners of non-Italian descent face significant challenges in becoming naturalised, including difficulties in retaining dual citizenship, which will be discussed in detail later.

The ideas and comments put forward by the two chambers when the dual citizenship policy / law no. 91/1992 was drafted and passed also corresponded to the vision of the Italian state with regard to the desire to maintain ties and a sense of nationality with Italians abroad. In the late 1980s the Italian government began to consider the adoption of a dual citizenship policy (Chamber of Deputies, 1992). The adoption of the dual citizenship policy in 1992 was met with widespread support from

the Italian diaspora. Many Italians living overseas were able to reclaim their Italian citizenship without having to give up their existing citizenship, allowing them to maintain their connection to Italy while also remaining citizens of their new country (Acone, 1991 cited in Senate of Republica and Legislature, 1991; Presidenza del consiglio dei ministri, 2023). This helped to strengthen the ties between Italy and the Italian diaspora (Pontone, 1991 cited in Senate of Republica and Legislature, 1991).

Barbieri (1992), MP of the Communist-PDS Party, suggested that in the Italian state feared that the bloodline would be lost with so many Italians living outside the country, especially during an extensive emigration period (Camera dei Deputati & Commissioni in sede legislativa, 1992). The Italian government has emphasised the transmission of Italian origins or bloodline for a long time. An important reason why Italy has historically attached importance to Italian bloodline or descent is that it faced a dilemma because it was a country without a nation (Koenig-Archibugi, 2003). From the outset, Italy faced the predicament of how to make Italians out of a politically, culturally, and linguistically diverse population, and a highly mobile one to boot. In 1861, seven distinct political entities were unified to form Victor Emanuel II's Kingdom of Italy. By 1870, strategic alliances and good fortune had made the addition of Venetia and most of the Papal states possible. Nevertheless, "making Italy" entailed at least two interrelated tasks. The first was to integrate the distinct state administrative systems under which people had lived before unification<sup>64</sup> (Bussotti, 2002, p. 21). The second and arguably more difficult task was what Massimo d'Azeglio famously referred to as "making Italians" of a population of about 26 million (Beales & Biagini, 2002, p. 3; Bosworth, 1979, p. 17; Hobsbawm, 1990, p. 44). At that time, Italy was a "state without a nation," a political organisation without a clearly imagined community, so the basis for building a shared sense of belonging needed to be clarified. Linguistically, only 2.5 per cent of the population at Unification spoke Italian, and most people in the new Italian territory at the time often spoke languages unintelligible to their putative co-nationals (De Mauro, 1976, p. 43). Therefore, ties to the family and paesani were more vital than those to the "nation" or the state (Gabaccia, 1999, p. 1116, 2013; Reeder, 2003, p. 179).

Barbieri (the Democratic Party of the Left) (1992) also put forward in the Chamber of

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<sup>64</sup> A significant indicator of this process was the redaction of the 1865 Italian Civil Code that required distilling one version from five regional precedents: the Austrian of 1815, the one from the Two Sicilies of 1819, Parma 1820, Subalpine 1837, and Modena 1831 (Bussotti, 2002, p. 21).

Deputies:

I believe that the attention that has been paid to the need to grant certain facilitations, also in terms of time, to the acquisition of citizenship by the children of emigrants is particularly important. Today, in fact, we are faced with return emigration that poses particularly delicate questions precisely on this front. In conclusion, we believe that we should avoid modifying the text approved by the Senate, which on the whole, we assess positively, in order to facilitate the swift conclusion of the process of a long-awaited measure (Camera dei Deputati & Commissioni in sede legislativa, 1992, p. 5).

The parliament wanted to guarantee these children of emigrants the right to Italian citizenship. Otherwise, these children of emigrants would have entered Italy as immigrants, but they would have been Italians by descent - a national origin that the Italian government had always wanted to preserve (Chamber of Deputies, 1992), supporting the protection of Italian descent abroad.

#### *Colonisation experience*

Italy's dual citizenship policy is also shaped by its colonisation history, particularly in relation to its overseas emigrants. The emigrants in question are typically related to countries that were previously colonised by Italy or that have themselves colonised Italy. Unlike other European nations, Italy's colonial past is marked by a late start and a quite limited period of abroad expansion. After Italy united in 1861, late 19th-century colonial aspirations were clearly apparent. With territory acquired abroad, Italy aimed to establish itself as a significant European force. Italy's first major colonial enterprise was in the Horn of Africa. In 1885, Italy began to establish control over parts of Eritrea, which was formally declared an Italian colony in 1890. Somalia became an Italian protectorate in 1889 and was later consolidated into Italian Somaliland (Mari et al., 2010). Italy's invasion of Ottoman-held Libya in 1911 sparked the Italo-Turkish War. By 1912, Italy had acquired both Tripolitania and Cyrenaica; in 1934, they merged to form the colony of Libya. This was one of Italy's most significant and long-standing colonial acquisitions (Fiorito et al., 2016). The most ambitious and notorious colonial endeavour Italy undertook was the 1935 invasion of Ethiopia. This resulted in the Second Italo-Ethiopian War; Ethiopia was acquired in 1936 and joined Eritrea and



Somalia under Italian East Africa. The occupation was cruel and encountered strong opposition; it finally ended in 1941 during World War II (Leone et al., 2018).

About being colonised, several areas of what Italy is now were under foreign rule for centuries prior to their unity. These professions helped to define Italy's political scene. From the 1st century BCE to the 5th century CE, the Roman Empire grew its dominance over Europe, North Africa, and the Middle East from the centre of the Italian peninsula. The fall of the Roman Empire resulted in a fractured Italy open to many invasions (Capelli et al., 2007). Up to the 11th century, areas of southern Italy stayed under Byzantine rule. Establishing the Kingdom of Sicily, the Normans invaded southern Italy and Sicily in the 11th century. The Holy Roman Empire periodically challenged northern and central Italy. Italy witnessed notable Habsburg influence from the 16th to the 18th century under Spanish and then Austrian rule over different areas (Grugni et al., 2018). Early 19th-century Napoleon Bonaparte's operations resulted in French rule over most of Italy, reorganised into client states of the French Empire. Italian nationalism and the drive for unity were profoundly shaped by this era (Ballinger, 2018).

Firstly, it is necessary to consider the complexities of Italian culture, which has been shaped by the country's colonial expansion and imperialist wars of conquest. As previously discussed, Italy is a nation in search of a national identity. The Italian state's nationalistic sentiments towards its emigrants and its unwavering resolve to maintain close ties with them are a consequence of Italy's historical and cultural legacy. Furthermore, the history of Italy encompasses the history of Italian colonisation. The historical and cultural context of Italy has led to the adoption of a dual citizenship policy that has consistently favoured the country's native population and their descendants.

In accordance with the provisions of Law 91/1992, Italy also enacted two corresponding laws with the objective of protecting its overseas compatriots of Italian descent who were scattered throughout the former colonies, namely Laws 379/2000 and 124/2006. According to Law 379/2000, persons born and formerly resident in territories which belonged to the Austro-Hungarian Empire before 16 July 1920 are granted the right to acquire Italian citizenship. The legislation is also applicable to the descendants of the aforementioned individuals. The territories to which the law refers comprise territories that are currently part of Italy or territories that were previously part of Italy but subsequently became part of Yugoslavia following the Second World War. The individuals eligible under this legislation may reside anywhere in the world,

with the exception of Austria<sup>65</sup> (Zincone, 2006a).

Legislation 124/2006 is comparable to legislation 379/2000 as it permits the regaining of Italian citizenship by former Italian citizens who resided in territories that were previously under Italian control but later became part of Yugoslavia after World War II. The territories in question, namely Istria, Fiume, and Dalmazia, are currently incorporated into Croatia. However, there are also disparities with law 379/2000. Law 124/2006 does not provide a certain timeframe for submitting an application. Furthermore, to meet the requirements for eligibility, individuals must have possessed Italian citizenship and resided in these territories during the period when they were transferred to the former Yugoslav Republic as stipulated by the 1947 Paris Peace Treaty and the 1975 Osimo Treaty. Another distinction lies in the fact that individuals who are descendants of former Italian nationals, although they are able to obtain Italian citizenship according to this law, are required to fulfil specific language and cultural criteria. Nascimbene (2005) remarks on the purpose of law 124/2006, stating that it was motivated by political and social factors. The law aims to address the tumultuous history of the Istria, Fiume, and Dalmatia regions from the end of World War II to the dissolution of the Federal Republic of Yugoslavia. It seeks to reorganise both the territories and the individuals affected by these events (Nascimbene, 2005). Besides, this law represents a shift from an objective to a subjective interpretation of what it means to be Italian. Put simply, in the past, Italian citizenship was determined based on objective, ethnic criteria. However, according to law 124/2006, the focus has shifted to a subjective, sentimental aspect, which now requires individuals to demonstrate cultural and linguistic expertise.

It is evident that a considerable number of Italian emigrants settled in countries with historical ties to Italy's colonisation legacy. Italy's nationalist sentiments towards emigrants and its firm determination to maintain close ties with them led to the enactment of the dual citizenship policy, which was designed to maintain the feelings of emigrants overseas. Furthermore, Legislative Decrees 379/2000 and 124/2006 were enacted with the objective of facilitating the restoration of citizenship for these emigrants dispersed across the globe, particularly in territories that had previously been involved in colonial relations and military conflicts with Italy. Notably, Law 124/2006,

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<sup>65</sup> Zincone (2006) argues that this phenomenon can be explained by the assumption that individuals who reside in Austria are of Austrian origin.

which supplements the dual citizenship policy no. 91/1992, places greater emphasis on language and cultural tests. This demonstrates that Italy's dual citizenship policy attaches importance to national sentiment, as previously discussed.

In addition to the colonial history that had already taken place, which had influenced the creation of the dual citizenship policy in Italy, the dual citizenship policy was also accompanied by new colonial expansion ambitions. Emigration has been posited as a means for nationalist expansion. In contrast to other European nations that employed military force for colonisation, Italy devised a strategy of utilising emigration to its economic benefit by establishing "free colonies" (*colonie libere*). The objective was to promote emigration to specific nations with the intention of establishing a significant Italian presence, to the extent that one might practically describe it as colonisation. In the past, when emigration laws were updated (for example, Law n. 23, 31 January 1901), many members of parliament also expressed support for nationalist and expansionist ideas. The Italian parliament sought to establish "free colonies" in the interests of the Italian motherland, defined as countries in which Italian influence was so great that it almost amounted to colonisation (Tintori, 2006, pp. 62–65).

The prominence of the expansionist ideology led to a greater emphasis on the goal of establishing "free colonies." The concepts put out by Nicola Apuzzo, the main advocate of this school of thought, were characterised by their ambitious and self-serving nature. According to Apuzzo, emigration was a reflection of the desire for territorial expansion, and the economic interests of Italians living abroad could be used as a justification for political intervention in foreign affairs (Tintori, 2006, p. 80). Nevertheless, when the majority of the members of the Chamber of Deputies demonstrated their support for expansionist nationalism, the expansion also received some criticism from the Senate (Tintori, 2006, pp. 71–74). According to these critics, the notion of establishing "free colonies" that would result in economic and political connections with emigration countries was deemed illusory. They contended that the emigrants belonged to a socioeconomically disadvantaged and poorly educated segment of society. In essence, they believed that these individuals would not be capable of advancing Italian interests overseas, whether they be economic or political.

### 10.2.2 Progressive social norms (Country image)

The Italian Constitution of 1948 introduced the concept of gender equality, and with the passage of time, Italy has become more and more respectful of human rights: the

right to move and choose the corresponding citizenship. since in Italy's previous policy of single citizenship embodied in Law no. 555/1912, even if citizens were not allowed to hold two or more dual citizenships, exceptions were made to allow the children of male Italians abroad to hold both citizenships of the country of birth and Italy if the country of birth was the principle of *jus soli*; the subsequent gender equality introduced in the 1948 Constitution strengthened emigration to persuade Italian legislators to vote for the dual citizenship legislation as societal norms evolved (Chiriano<sup>66</sup>, 1992; Lanzinger<sup>67</sup>, 1992; Spini<sup>68</sup>, 1992). Tossi (1991) (Com-PDS party), Strik (1991), Acone (1991) (PSI party), and Toth (1991) (DC party) suggested that the single citizenship policy in Law no. 555/1912 has been criticised for sustaining an inequality between the sexes for a long time. The principle of the subordination of women to male heads of household was a vital feature from Statuto Albertino 1848 through to Law no. 555/1912. When Statuto Albertino was introduced in 1848, women were subordinate to the authority of the *pater familias*<sup>69</sup> (Camera dei Deputati, 1992a; Senato della Repubblica X Legislature, 1991).

The *pater familias* was the head of a Roman family. The *pater familias* was the oldest living male in the household and could legally exercise autocratic authority over his extended family. This principle was held to be very pertinent in the matter of citizenship. Although Article 24 in Statuto Albertino states that: "All subjects, whatever be their title or rank, are equal before the law. All enjoy equal civil and political rights, and are admissible to the civil and military offices, except under circumstances determined in the Law", such proclaimed equality before the law actually referred only to men. Every event pertaining to the husband's citizenship was passed down to the family due to the subjection of women and their offspring to the husband. This could involve losing or regaining citizenship. For instance, if the husband naturalised in another country, the family might lose their Italian citizenship (Donati, 2013; Muehlebach, 2012). This principle of female subordination<sup>70</sup> continued until the

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<sup>66</sup> Rosario Chiriano became a member of Christian Democracy in 1952. He was a member of the Chamber of Deputies from 1987 to 1992 in the 10th legislature.

<sup>67</sup> Gianni Lanzinger. He was a member of the South Tyrol, Alto Adige Green Party, of which he was the first member to be elected as a Member of Parliament in the 1987 parliamentary elections. He remained in office in Montecitorio until the end of the 10th Legislature in 1992.

<sup>68</sup> Valdo Spini is a long-time member of the Italian Socialist Party (PSI). He was elected to the Italian Chamber of Deputies in 1979, and re-elected seven times, remaining in office as an MP until 2008.

<sup>69</sup> The term is Latin for "father of the family" or the "owner of the family estate".

<sup>70</sup> The principle of the wife's subjection to the husband (one with ancient precedents) was prominent in the fundamental legal system even if the Statuto Albertino did not mention equality or disparity between

introduction of Law no. 555 of 1912, which remained the policy of single citizenship used in Italy until 1992. Under Law no. 555 of 1912, the husband had priority in the marriage. The citizenship of wives and children depended on the husband or father's citizenship (Legge 13 Giugno 1912, n.555 Sulla Cittadinanza Italiana, 1912).

With the introduction of the 1948 Constitution of the Italian Republic, things began to change. Article 29, under Title II of the Constitution of the Italian Republic 1948, "Ethical and Social Relations", reads: "The Republic recognises the rights of the family as a natural society founded on matrimony." The second clause establishes equality between spouses, stating: "Matrimony is based on the moral and legal equality of the spouses within limits laid down by law to guarantee the unity of the family." As has been outlined above, high emigration from Italy persuaded members of Parliament to vote for the new dual citizenship policy, to replace the country's previous single citizenship policy. Because Italy has always attached great importance to descent, even during the era of the previous single citizenship policy, exceptions were made for the children of male Italian citizens abroad in order to strengthen ties with the Italian diaspora and facilitate the acquisition of citizenship for the children of Italian expatriates. However, as societal norms evolved, gender equality was emphasised in the 1948 Constitution. Female Italian citizens abroad were argued to also have the right to pass their citizenship to their children (Presidenza del consiglio dei ministri, 2023). So, because of the importance attached to descent, alongside progress in the societal norms relating to gender equality, emigration levels encouraged Italy to revise its citizenship policy. Allowing Italian citizens to hold multiple citizenships not only included the children of male citizens abroad in the single citizenship policy but extended to a formal dual citizenship policy for all: in short, regardless of gender, Italian citizens do not lose or need to renounce their Italian citizenship when they acquire other citizenships.

The general principle of equality between men and women was implemented in Bill No. 1460 (Predecessor of Law no. 91/1992). It needed to give concrete effect to the principle of equality between men and women: it therefore eliminated certain forms of discrimination against women, for example via the extension of citizenship to their

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the sexes (the legislative meaning). The codified law contains numerous examples, including article 144 of the Civil Code of 1939 and law number 555 of 13 June 1912, "On Italian Citizenship" (Donati, 2013). Law 555 established the primacy of the husband in the marriage and the subordination of the wife and the children to his life events pertinent to his citizenship.

children, as provided for in Articles 1, 5, and 7 (Camera dei Deputati & Commissioni in sede legislativa, 1992, p. 3,4,7). As has been seen, ideas about gender equality brought about by changes in social norms assisted in the implementation of the Italian policy of dual citizenship. At the very least, unlike the exceptions in the previous single citizenship policy, the children of female Italian citizens abroad could now also retain their Italian citizenship, even if they chose to naturalise as citizens of another country.

In addition, legislators are also aware of the rights of citizens. There were also direct statements from many Members of Parliament when the bill on Act 91 of 1992 (No. 1460) was passed to the Chamber of Deputies for discussion that reveal how these issues related to emigration (as explored above) and the connection between emigration and the proposed change in citizenship law. Lanzinger (Federation of the Greens<sup>71</sup>) proposed, concerning emigrants abroad, that the government had committed to implementing the emigration package approximately fifteen years before, adding that the citizenship of Italians abroad ought to be legally retained and they should be able to have the right to vote in elections in Italy abroad. As the public saw this commitment being realised fifteen years later, “a further delay was no longer acceptable to resolve this problem, which concerned not only private interests but a great public interest, the implementation of the Constitution, which precisely establishes the right of citizens” (Camera dei Deputati & Commissioni in sede legislativa, 1992, p. 7). Also, Chiriano (Christian Democracy party<sup>72</sup>) (1992), Spini (Undersecretary of State for the Interior) (1992), and Lanzinger (Federation of the Greens) all mentioned that in the switch to the dual citizenship policy, the principle of equality between men and women applies both to the effects of marriage on citizenship and the acquisition of citizenship by children.

In summary, the evolution of Italian social norms has resulted in a heightened focus on gender equality and civil rights, accompanied by the introduction of clear provisions, most notably the Italian Constitution of 1948. This has resulted in the previous citizenship policy for descendants of Italian descent being made universal to the descendants of Italian women overseas and all citizens. While there are still limitations in practice, such as the harsh treatment of non-privileged immigrants (those who are not of Italian descent and non-EU immigrants), the 1992 law has made significant

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<sup>71</sup> The Federation of the Greens (Italian: Federazione dei Verdi, FdV), frequently referred to as Greens (Verdi), was a green political party in Italy formed in 1990 by the merger of the Federation of Green Lists and the Rainbow Greens. The FdV was part of the European Green Party and the Global Greens. In July 2021 it merged into Green Europe (Biorcio, 2016).

<sup>72</sup> The note in brackets is the party or position to which the member of parliament belonged.

strides towards the policy of dual citizenship. The policy of dual citizenship for non-privileged immigrants will be discussed in greater detail in section 10.3.

### 10.2.3 Relations with neighbours

Italy's relations with its neighbouring countries have also influenced its decision to adopt a dual citizenship policy. In particular, Italy's relations with neighbouring countries align with the second category of individuals favoured by Italy's dual citizenship policy, namely citizens of EU member states. Italy's historical, economic, and cultural ties with neighbouring countries have encouraged an inclusive and open attitude towards its citizenship policy, which helped Italy to switch from a single citizenship policy to a dual citizenship policy. Many of Italy's neighbours are also members of European supranational organisations. The ongoing political and economic integration, and the concept of European citizenship promoted by these European supranational organisations have encouraged Italy to move to a dual citizenship policy (Fioret and Ruffino, 1991 cited in Senate of Republica and Legislature, 1991).

Italy shares land borders with France, Switzerland, Austria, and Slovenia, and maritime borders with Croatia and Tunisia. France and Italy have a long history of close cultural and economic ties. Many Italian emigrants have settled in France, and there is a large French-speaking community in Italy (Cesarani & Fulbrook, 1996; B. S. Turner, 1990). The relationship between the two countries has been characterised by cooperation on issues such as emigration, immigration, tourism, and cultural exchange (Hansen & Koehler, 2005; Schlenker et al., 2017; B. S. Turner, 1990). The friendly relations between France and Italy encouraged Italy to adopt a more open approach to citizenship because of these close exchanges in migration and tourism, in recognising the rights of citizens who hold both Italian and French citizenship (Camera dei Deputati & Commissioni in sede legislativa, 1992; Swyngedouw, 2004).

Switzerland is a country with a large Italian-speaking population; indeed, Italian is one of Switzerland's four official languages, along with German, French, and Romansh. Approximately 8% of Switzerland's population speaks Italian as their first language. Besides, the Italian diaspora in Switzerland is substantial, with many Italians having migrated to Switzerland in the 20th century for work and economic opportunities (Gargiulo, 2021; Parisi, 2015). Switzerland has had a policy of recognising dual citizenship since 1 January 1992, shortly before Italy's change to the dual citizenship policy (Schlenker et al., 2017). Due to the aforementioned emphasis on emigration,

Italy was pushed to adopt a dual citizenship policy because Switzerland had a dual citizenship policy in place and a significant portion of Italy's foreign immigrants were from Switzerland. Additionally, Switzerland has been a key partner in the European integration process. Switzerland signed a free-trade agreement with the then European Economic Community in 1972, which entered into force in 1973, and became part of the single market. It is a member of the European Free Trade Association (EFTA) and took part in negotiating the European Economic Area (EEA) agreement with the European Union (Schlenker et al., 2017). Swiss nationals have the same rights to live and work in Italy as other EEA nationals, which also encouraged Italy to be more tolerant, giving them the right to hold dual or multiple citizenships (Schlenker et al., 2017).

Austria and Tunisia are also important neighbours of Italy, both of which have had an impact on Italy's dual citizenship policy. There are a significant number of Austrians of Italian descent in Austria. The largest concentration of Austrians of Italian descent live in the province of Tyrol, particularly in the region around the city of Innsbruck, where Italian immigrants began to settle in the 1950s and 1960s. Many of these immigrants were from the northern Italian regions of Lombardy, Trentino-Alto Adige or Südtirol, and Veneto, and moved to Austria for work opportunities in industries such as construction, hospitality, and agriculture. Many Austrians of Italian descent integrated into Austrian society and consider themselves both Austrian and Italian (Atkins & Politi, 2017; M. Vink & Baubock, 2013). The Italian language and culture have also had a significant influence on Austrian society, particularly in the areas of cuisine, fashion, and music. The relationship between the two countries has been characterised by cooperation on issues such as tourism, trade, and cultural exchange. Because of the large number of people of Italian origin in Austria and the many cultural exchanges between the two countries, the good relations between Italy and Austria have led to greater tolerance and understanding of citizens of each origin in each country. This has encouraged the choice of a dual citizenship policy in Italy, as a way of allowing Austrians to naturalise as Italians and retain dual citizenship along with those of Italian origin in Austria (Guild et al., 2009; Perna, 2018; M. Vink & Baubock, 2013).

Tunisia has also had close historic ties with Italy. There was already a significant Tunisian community in Italy prior to 1992, particularly in the northern regions of Lombardy, Piedmont, and Liguria, where many Tunisians had migrated in search of work opportunities and better living conditions. The largest wave of Tunisian



immigration to Italy occurred in the 1970s and 1980s, a time when Italy experienced a period of economic growth and labour shortages. Many Tunisians were recruited to work in industries such as construction, manufacturing, and agriculture, and some eventually brought their families to Italy too (Urzi & Williams, 2017; Zincone, 2006c). According to the Italian National Institute of Statistics (ISTAT), the number of Tunisian residents in Italy increased from just over 4,000 in 1971 to over 51,000 in 1981. By 1991 there were over 145,000 Tunisians living in Italy, representing one of the largest non-EU immigrant groups in the country (Giglioli, 2017). Tunisian immigrants, as the largest group of non-EU immigrants in Italy at the time, contributed to a great extent to the enrichment of the Italian labour force, helping to solve the labour shortage and the economic recovery of Italy at the time. In order to retain the benefits of these human resources and the economic development they brought, Italy welcomed and was pleased to grant dual citizenship to these immigrants, which encouraged Italy to move from a single citizenship policy to a dual citizenship policy at the time, as a reflection of the immigration and labour ties between Italy and Tunisia (Badalič, 2019; Urzi & Williams, 2017; Zincone, 2006c).

Furthermore, most of the countries around Italy had already adopted a dual citizenship policy by the time Italy accepted or converted to it in 1992. Specifically, France, Switzerland, Slovenia, Croatia, Montenegro, Albania, Spain, Morocco, Tunisia, and Libya all had a dual citizenship policy in place (ADISA VEMENDJA Jone TI, 2023; Cabrillo, 2023; Citizenship Division, 2021; Federal Statistical Office, 2021; General People Conference, 2010; Government of the Republic of Croatia, 2023; ined, 2012; Komnencic, 2023; Ministry of Foreign Affairs African Cooperation and Moroccan Expatriates, 2023; Ministry of the National Defense, 2023). Bosnia and Herzegovina gained independence from Yugoslavia on March 3, 1992, and immediately adopted a dual citizenship policy (Brijeg, 2021). However, Austria, Greece, Malta, Monaco, Algeria, and Andorra all have a single citizenship policy (Federal Ministry Republic of Austria, 2023; Goussanem, 2023; Government of Malta, 2023; Hellenic Republic, 2023; Ketenci and Ketenci International Legal Practice, 2023; Sliman, 2023). Overall, 65% of Italy's neighbouring countries had a dual citizenship policy when Italy adopted its own dual citizenship policy in 1992. This may have given Italy additional confidence to change to a dual citizenship policy, as countries choose a policy which will be beneficial (Poon et al., 2006; Wilson et al., 2017). This phenomenon can also be explained by the contagion effect, which emphasises the regional dynamics involved.

More than half of the surrounding countries have adopted dual citizenship policies, and the country itself has also adopted such policies for the purposes of regional integration, migration patterns, or political or economic integration (Hoffmann, 2019; Risse, 2016; Schmitter, 1970) .

### *Supranational organisation and contagion effect*

Many of Italy's neighbours are members of European supranational organisations. The ongoing political and economic integration, and the concept of European citizenship promoted by these European supranational organisations also encouraged Italy to move to a dual citizenship policy. In 1952, France, Italy, Belgium, the Netherlands, Luxembourg, and West Germany set up the European Coal and Steel Community (ECSC) to take over the management of the Ruhr and remove some of the restrictions on German industrial production, while cooperating to promote the production and sale of coal and steel (Cesarani & Fulbrook, 1996). On 25 March 1957 in Rome, the foreign ministers of these six countries signed the Treaty of Rome, establishing the European Economic Community and the European Atomic Energy Community. In 1958, the European Economic Community and the European Atomic Energy Community were formally established to create a common market, abolish tariffs between member states, and promote the free movement of labour, goods, capital, and services between them. The European Economic Community developed a customs union between the member states, and the European Atomic Energy Community integrated the nuclear energy sector (Howard, 2005). On 1 July 1967, Italy signed the Treaty of Brussels with Germany, France, the Netherlands, Belgium, and Luxembourg, uniting them in the European Coal and Steel Community, the European Atomic Energy Community, and the European Economic Community under the collective name of the European Community (EC). Later, on 1 July 1987, the Single European Act entered into force, and a (by now expanded) European Community created a single market, eliminating most barriers to trade in goods and adopting some common product regulation policies, technical standards, tax barriers, etc., while also eliminating physical borders between economic members to the maximum extent possible in the hinterland, thus allowing free movement of capital, labour, enterprises, and services within the single market (Bindi, 2011). In June 1990, Italy joined the Schengen Agreement with Germany<sup>73</sup>,

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<sup>73</sup> On 3 October 1990, East Germany was incorporated into the Federal Republic of Germany (West

France, Luxembourg, the Netherlands, Belgium, Greece, Spain, and Portugal, which abolished the borders between these member countries. Citizens of the member states were free to travel and reside indefinitely in other member states (Bindi, 2011; Howard, 2005).

The European Coal and Steel Community, the European Economic Community, the European Atomic Energy Community (including their relevant treaties<sup>74</sup>) developed a framework for the free movement of people, goods, and capital within. These European supranational organisations have together promoted and implemented: 1) the establishment of a common market; 2) economic integration; 3) the abolition of tariffs between member states and the promotion of the free movement of labour, goods, capital, and services between member states; 4) the elimination of border crossing restrictions between member states; 5) the implementation of a common foreign and security policy and, eventually, a common defence policy; 6) the implementation of a common fisheries policy; 7) the establishment of a European monetary system, the building of an economic and monetary union and other measures; and 8) the gradual transition from regional economic co-development to the development of regional political and economic integration. To do all this, a series of treaties or conventions were signed which relate to the development of economic and political European integration (Bindi, 2011; Cesarani & Fulbrook, 1996; Howard, 2005).

This framework has influenced Italy's citizenship policies in several ways. First, Fioret (DC party) (1991) put forward in the 524<sup>th</sup> Public Sitting these European supranational organisations have required their member states to allow citizens of other member states to live and work within their borders without discrimination (Pastore, 1999; Senate of Republica and Legislature, 1991). This made it more difficult for Italy to restrict the rights of citizens of other member states who also hold Italian citizenship. Second, the European Community promoted the concept of multiple citizenships,

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Germany), completing German reunification.

<sup>74</sup> EU's earliest predecessors incorporated primarily by a group of founding states known as the Inner Six (Belgium, France, Italy, Luxembourg, the Netherlands, and West Germany) at the start of modern institutionalised European integration in 1948 and onwards, namely to the Western Union (WU, 1954 renamed Western European Union, WEU), the International Authority for the Ruhr (IAR), the European Coal and Steel Community (ECSC), the European Economic Community (EEC, 1993 renamed European Community, EC) and the European Atomic Energy Community (Euratom), established, respectively, by the 1948 Treaty of Brussels, the 1948 London Six-Power Conference, the 1951 Treaty of Paris, the 1957 Treaty of Rome and the 1957 Euratom Treaty. These increasingly amalgamated bodies, later known collectively as the European Communities have grown since, along with their legal successor, the EU (Bindi, 2011; Hix & Høyland, 2022; Martill & Staiger, 2018).

recognising that many European citizens wanted to hold multiple citizenships, or already held multiple citizenships. The EC therefore encouraged member states to allow this practice (Cesarani & Fulbrook, 1996). This influenced Italy's adoption of the dual citizenship policy, as the practice has become more common and acceptable across Europe. Third, Ruffino (1991), Undersecretary of State for the Interior, adds that these European supranational organisations have had a cultural and political influence on Italian citizenship policy by promoting the idea of a common European identity, making it more difficult for member states to restrict the rights of citizens with multiple citizenships (Howard, 2005; Senate of Republica and Legislature, 1991). This encouraged Italy to adopt a more inclusive citizenship policy that recognises the rights and identities of its citizens who also hold citizenship in other member states.

Overall, Italy's role as a member of these European supranational organisations has clearly influenced its citizenship policies. Italy has long been bound by the corresponding treaties and agreements of these European supranational organisations (Cesarani & Fulbrook, 1996). The framework for the free movement of people, goods and capital built by these European supranational organisations required Italy to recognise the rights of people from other member states and to provide them with certain benefits, including the right to work and reside there. Italian citizens, meanwhile, enjoy the same equal rights and benefits in the remaining member states (Bertilsson et al., 2006; Pastore, 1999). This consensus pushed Italy to change its single citizenship policy to a dual citizenship policy.

### **10.3 The Dilemma of Dual Citizenship Policy in Italy**

This section will present a critical analysis of the complexities inherent in Italy's dual citizenship policy. The issue is a dilemma because Italy's dual citizenship policy explicitly states that all citizens can retain dual citizenship. In practice, Italy's citizenship policy has consistently prioritised individuals of Italian descent, followed by citizens of other EU countries. In particular, those immigrants who do not fall into the aforementioned categories have significant difficulty in obtaining Italian citizenship, and dual citizenship appears to be a luxury to them. The stringent naturalisation requirements for immigrants render Italy's dual citizenship policy a "conditional" dual citizenship policy. Despite the gradual implementation of reforms over time, immigrants have consistently been excluded from the focus of Italy's citizenship policy. This section will commence with an examination of the impact of migration on Italy's

physical and human capital. It will demonstrate that the inflow of migrants has resulted in a net improvement in the country's physical and human capital, thereby facilitating economic growth and addressing some demographic challenges – this was one of the factors that led to Italy's adoption of a policy of dual citizenship. It is, however, important to note that the migrants who remain in Italy and contribute to the country's economic and national development are often those who immigrate, rather than those who emigrate. The section subsequently will analyse from the perspective of the political regime and the political party in power, indicating that, despite this, the situation in Italy, where citizenship policies favour compatriots of the same origin and do not value immigrants, is unlikely to change in the long term, at least not yet.

### 10.3.1 Physical and human capital

It has been postulated that the influx of migrants has contributed to the growth of the Italian economy and the advancement of the nation as a whole, due to the increased levels of physical and human capital. Migration involves the movement of people. Population mobility is directly linked to human capital. At the same time, people can also move with physical capital. In this sense, population movement is also linked to the physical capital factor in the hypothesis. In the meeting records of the Italian parliament and government there were statements from Members of Parliament that, such as Lanzinger (Green Party) (1992)<sup>75</sup> that the policy of dual citizenship can help to face the labour problems that Italy is currently facing and to help the economy. It shows that human and physical capital have influenced the adoption of the dual citizenship policy in Italy. On the other hand, human and physical capital are linked to migrations.

There was a growing recognition among Italian policymakers that allowing dual citizenship would bring numerous human-resources-related and economic benefits to the country, including encouraging inflows of skilled people (e.g., returned emigrants and naturalised foreigners), mitigating the problems associated with an ageing population, promoting trade and investment, and boosting the national economy (Camera dei Deputati & Commissioni in sede legislativa, 1992; Chamber of Deputies, 1992; Favell, 2008; Permanente, 1982; Schierup et al., 2008; Schlenker et al., 2017).

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<sup>75</sup> "...a further delay (of changing to the dual citizenship policy) is not acceptable to solve this problem, which concerns not only private interests but of great public interest, ..." (Chamber of Deputies, 1992)

During the period from 1950 to 1991, migration flows had a profound impact on human capital and demographic trends in Italy, including the ageing population, marriage and childbirth rates, and the youth workforce. Migration inflows both from within the EU, and with other countries around the world, are relevant here (Gesano & Strozza, 2011; United Nations Department of Economic and Social Affairs Population Division, 2000). Changes in human capital accompany changes in physical capital and are related to the economic development of a country (Schlenker et al., 2017).

Between 1950s and 1960s, a significant number of Italian people emigrated to other countries, particularly young and working-age individuals, to seek better economic opportunities abroad. This emigration was largely towards other European countries, as well as North and South America (Fiore, 2018; Romeo, 2022). The departure of these young individuals led to a brain drain, as the country lost a substantial portion of its human capital. The departure of young people due to emigration also likely led to a more ageing population and falling marriage and childbirth rates. Moreover, the emigration of young Italians led to a shortage of young workers (Calvanese & Pugliese, 1988; Le Van et al., 2018).

However, the situation began to change during the 1970s and 1980s. As Italy's economy grew and industrialised, it began to attract immigrants from other countries. Initially, these immigrants were primarily from other European countries, but over time, immigrants from further afield arrived, including North Africans and Asians (Calvanese & Pugliese, 1988; Zincone, 2006c). This immigration helped to replenish the country's human capital, as these immigrants brought skills and knowledge (Cesarani & Fulbrook, 1996). The arrival of these younger immigrants also helped to balance the age structure of the population, countering the aging trend brought about by Italian emigration and low birth rates. Also, the immigration flows boosted the youth workforce (Mazzola et al., 2016).

The change of human capital brought about by population movements was accompanied by a change to Italy's physical capital. In the aftermath of World War II Italy was left in ruins, with its infrastructure severely damaged, industrial production stalled, and its economy a shambles (Bozzi, 2021). Although the state received considerable aid under the Marshall Plan between 1948 and 1963 and experienced an economic miracle via a period of rapid economic growth, that began to wane in the mid-1960s, leading to a period of economic instability marked by high inflation and unemployment. Domestic political instability, labour disputes, and global oil crises in

the 1970s further exacerbated these issues. The global oil crises of the 1970s and early 1980s hit Italy hard, leading to a period of stagflation — a combination of stagnation and inflation. Unemployment rose, particularly in the south, and public debt began to increase significantly (Sassoon, 2014; Schierup et al., 2008). However, in the mid-1980s Italy underwent a series of structural reforms to combat its economic problems. This included tackling inflation, reducing public spending, and liberalising the labour market. These reforms helped to stabilise the economy (Sassoon, 2014).

In relation to these reforms, policymakers recognised that migration flows with other countries drive physical capital flows, thus contributing to rebuilding and modernising the country's economy. The flow of human and physical capital brought about by migration liberalised the Italian labour market. For example, the previously described mass immigration between the 1970s and 1980s often involved people taking up jobs in sectors such as industry and services, contributing to Italy's economic growth (Zincone, 2006c). When skilled immigrants arrive in a country, they may also bring with them knowledge and expertise in areas that are important for physical capital development, such as engineering, technology, and construction. This can help to improve the productivity and competitiveness of the country's businesses, leading to higher profits and higher salaries for workers (Le Van et al., 2018). Another way in which immigration can influence a country's physical capital development is through investment. Immigrants may bring capital that can be invested in the country's physical infrastructure and equipment, such as through starting new businesses or investing in existing ones (C. Turner et al., 2013). Besides, although emigrants go abroad, they often send remittances back to their home country (in this case, Italy) because of their links with their families at home, thus contributing to Italy's economic recovery (Della Puppa & Sredanovic, 2017). Agreements with supranational European organisations, such as the Schengen Agreement, have also helped the flow of human and physical capital within European countries, contributing to the development of human and physical resources discussed above, thus further addressing demographic-related issues (ageing populations, youth labour shortages, etc.) and national economic development (Schierup et al., 2008).

Clearly seen, many academic papers and policy speakers seem to agree that the flow of migration of Italy has brought Italy increased human and material resources, helping it to develop its economy and overcome some of its demographic problems. During the reform of the citizenship policy, which has traditionally shown preference

towards those of the same ethnic background, numerous Members of Parliament hold the belief that revoking Italian citizenship would also result in a diminished sense of attachment to Italy. This was considered undesirable because Italy relies heavily on remittances.

Nevertheless, numerous political commentators are unable to differentiate between the contributions of emigrants and immigrants to the physical and human development of their countries. The law represents the idea that emigrants will return with valuable human and financial resources that will contribute to the country's economic growth, despite there being no evidence to support this notion (Arena et al., 2006, p. 346). Cabrini (1912) argued that there should only be two possibilities: either the allure of the Italian homeland was strong enough to persuade Italians to return on their own, or the appeal of the new country was stronger. The emigrants belonged to a socioeconomically disadvantaged and poorly educated segment of society. Consequently, they were unable to promote Italian interests overseas, whether they were economic or political in nature. (Tintori, 2006, pp. 71–74). Pastore's assertion in a 2001 publication that the number of individuals who regained Italian citizenship, including former nationals and their descendants, was likely to be small is potentially accurate. This is because the enactment of the 1992 law coincided fortuitously with a period of robust economic growth and political stability in the primary Latin American countries where these individuals resided (Pastore, 2001). In addition, Tintori (2009) demonstrates that the socio-economic challenges faced by Argentina (2001) and Uruguay (2002) resulted in a significant surge in applications for the acknowledgment of Italian citizenship (Tintori, 2009).

This evidence suggests that Italian emigrants are "conditional" in their retention of Italian citizenship. The situation is not as straightforward as policymakers would have us believe. When their destination countries are experiencing economic growth and political stability, they do not choose to retain or restore their Italian citizenship. This is because it is not a particularly strong incentive for them to do so; instead, it may be a burden. However, in instances where their destination countries experience social unrest or economic decline, the number of emigrants who restore their Italian citizenship increases. It can be observed that these emigrants do not contribute as much to the economic or national development of Italy as policymakers claim. These emigrants only supported Italian projects if it served their own social and economic cause in the country of immigration. If not, they did not feel compelled to further the



Italian cause. It was thus clear that emigrants, when put to the test, saw their future in their new country of residence (Cabrini, 1912 cited in Tintori, 2006 p.99). Even if emigrants keep or restore their Italian citizenship, would they inevitably come back to Italy? – The answer is ambiguous. A significant number of expatriates who have regained Italian citizenship and consequently received EU citizenship have chosen to reside in countries where they have stronger cultural and linguistic ties, such as Spain and Portugal. They also migrate to London in large quantities (Tintori, 2009; O. Vonk, 2012). In addition, possessing Italian citizenship grants individuals the privilege of travelling to the United States without the need for an entry visa. The Italian dual citizenship policy, in a tremendous irony, may have a considerably larger impact on other states than on Italy itself (Tintori, 2009).

### 10.3.2 Non-privileged immigrants

The 1992 Act, which established a dual citizenship policy, reflected a continued inclination towards a welcoming attitude towards co-ethnics. However, this legislation demonstrated a less favourable stance towards immigrants than its predecessor of 1912. The conditions for acquisition by *jus soli* or naturalisation are particularly challenging to meet in Italy, a country that is among the EU Member States with the most restrictive citizenship policy in respect of immigrants (O. Vonk, 2012). The 1992 Act imposed more stringent conditions on the acquisition of Italian citizenship by birth (*jus soli*) than its predecessor of 1912. The legislation evinces a clear preference for co-ethnic individuals in the absence of any discernible rationale for favouring those of Italian descent.

The implementation of the 1992 Act was a belated decision, as Italy's reinforcement of the *jus sanguinis* elements in the 1992 Act indicated a perception of itself as a country of emigration, despite its status as a country of immigration since 1973 (Calvanese & Pugliese, 1988; Zincone, 2006c). After its economic transformation in the 1970s and 1980s, Italy became a country of immigration, reversing the previous historical trend. Returning nationals and their families led migratory flows toward Italy, soon to be followed by immigrant flows (Ascoli, 2019). In Italy, new immigrants came from across the world, for example from Eastern Europe, North Africa, Latin America, and Asia (Calvanese and Pugliese, 1988; Martin, 2013). To help these immigrants to work legally and live in Italy, introducing a dual citizenship policy became a consideration.

Italian immigration includes returning nationals and their families as well as foreigners moving to the country from other European and non-European countries. Returning Italian residents and their families can also quickly regain their Italian citizenship while retaining their existing citizenship elsewhere (Bianchi, 2011). The 1948 Constitution of the Italian Republic established the equality of all citizens in the following way: "All citizens have equal social dignity and are equal before the law, without distinction of sex, race, language, religion, political opinions, personal and social conditions" (first clause, Article 3<sup>76</sup>, 1948 Constitution of the Italian Republic). It requires that immigrants of non-Italian descent or non-European immigrants be treated equally. Accordingly, when foreign immigrants acquire Italian citizenship, they should also be allowed to keep their previous citizenship. Chiriano (Christian Democracy Party), the rapporteur, argued in the debate in the House of Commons on the passage of the dual citizenship policy that: "Immigrants are guaranteed the right to keep their original citizenship, thus expressing a significant sense of solidarity through a kind of supernational integration, implemented based on the rights and duties laid down" (Camera dei Deputati & Commissioni in sede legislativa, 1992, p. 3;7).

In practice, the procedure for immigrants wishing to naturalise and maintain dual citizenship is more complex and rigorous than for Italian citizens of Italian origin or bloodline to join the citizenship of another country while retaining Italian citizenship. The conditions for the naturalisation of non-European immigrants are also more demanding, and the process is more cumbersome and time-consuming (Schlenker et al., 2017). As Spini, Undersecretary of State for the Interior, commented on the dual citizenship policy bill (no. 1460), "Innovative are the provisions concerning European Community citizens (four years' residence) and stateless persons (five years' residence), while Article 9 provides for a ten-year residence period for non-EU foreigners<sup>77</sup>" (Camera dei Deputati & Commissioni in sede legislativa, 1992, p. 4). To further complicate matters, Spetig (1991) (Communist Refoundation party) adds, EU membership, specifically in the Schengen area of free movement, has put considerable pressure on Italy to control its borders in the face of migratory flows that EU partners

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<sup>76</sup> Article 3, which forms part of the constitution's "Fundamental Principles", has two clauses.

<sup>77</sup> Further, "...The loss of citizenship, in the event of acquiring another one, is no longer automatic, as in the 1912 law, but is linked to an express declaration of will by the interested party. A similar declaration of willingness, made within two years from the coming into force of the law, allows the re-acquisition of citizenship for those who had lost it as a result of the previous automatism or for not having opted when they reached the age of majority, as established by articles 2, 3, 4, 11 and 17" (Camera dei Deputati & Commissioni in sede legislativa, 1992, p. 4).

like Germany and France fear may end up in their territories (D. C. Martin, 2013; Senate of Republica and Legislature, 1991). Therefore, Italy has a dual citizenship policy, although the regulations prefer descendants of past Italian emigrants or local Italians and are stricter toward non-EU immigrants. It is much more challenging to naturalise non-EU immigrants than to naturalise EU immigrants. Over the past decade (2013-2023), the Italian government and parliament have focused more on the “existing” naturalised new Italians and how to integrate or assimilate them into Italian culture and society; rather than on the “new” foreigners or immigrants to Italy.

### 10.3.3 Impact of political regime and party affiliation on co-ethnic preferences

Nevertheless, the Italian citizenship policy's preference for compatriots and the harsh conditions for immigrants of non-Italian descent and non-EU member states make Italy's dual citizenship policy appear to be a "conditional" dual citizenship policy. This is because foreigners of Italian descent or Italians abroad can easily restore and maintain their citizenship in their country of residence and Italy. Nonetheless, non-privileged immigrants, specifically those of non-Italian descent and those from non-EU member states, face significant challenges in attaining Italian citizenship, let alone retaining dual citizenship. It seems unlikely that the Italian dual citizenship policy will undergo any significant changes in the near future, given the political context and the influence of the various parties involved.

What is intriguing about the Italian instance is that, unlike numerous other countries, the citizenship and migration policies remain mostly consistent regardless of whether the political right or left is in power (Weil, 2020). It might be argued that the Italian left and right adhere to the conventional division as described by Joppke (2003). The political left, in line with its universalist mission, typically advocates for citizenship standards that are devoid of ethnic considerations, hence reducing the requirements for immigrants to get citizenship. In contrast, the political right, which prioritises the state of being rather than the process of change, typically advocates for citizenship regulations that emphasise ethnic identity, and seeks to develop connections with individuals abroad, including those who are foreign-born and their descendants (Gallo & Tintori, 2006; Joppke, 2003). However, the Italian situation also demonstrates the overall agreement between the left and right political factions in historic emigration countries regarding a favourable policy towards fellow citizens living abroad. Law 379/2000 was enacted during the tenure of a center-left government (Joppke, 2008).

The dominant lobby groups in the migration sector, namely catholic organisations and employers' associations, were primarily focused on objectives other than awarding citizenship to immigrants. The primary emphasis of the majority of Catholic organisations was on advocating for the legalisation of immigrants and ensuring their access to fundamental rights. The acquisition of citizenship was regarded as a "luxury" rather than a fundamental necessity, and hence was given lower priority (Zincone, 1998). The employers' groups, however, faced the challenge of Italy's ageing population and the demand for workforce. As a result, they supported the idea of increasing legal migration. This approach diverged from public sentiment, which sought to halt immigration but was also willing to enhance the status of (undocumented) immigrants already residing in Italy by granting them citizenship privileges (O. Vonk, 2012).

The market need immigration and hence it cannot be halted; yet, public sentiment has strongly shifted against additional immigration. In order to appease public sentiment, a decision was made to restrict the privileges of immigrants. Under the dual citizenship policy, immigrants are permitted to enter, so contributing to the growth of the Italian market. Nevertheless, the process of naturalising these underprivileged immigrants is exceedingly challenging, not to mention the complexities associated with obtaining dual citizenship. The Italian dual citizenship policy can be described as a "conditional" policy, since it allows individuals of Italian descent to get dual citizenship easily, while making it very difficult for immigrants without Italian descent to acquire Italian citizenship and maintain multiple citizenships.

In 1999, Livia Turco, the Minister of Social Affairs, presented a proposal that was particularly beneficial for minors. The proposal stated that a child born in Italy to immigrant parents who had legal residency could obtain Italian nationality starting from the age of five. Additionally, the proposal included the implementation of double *jus soli*. In addition, the stringent naturalisation standards, which include the need for legal and continuous residence until the age of eighteen, were planned to be eliminated (Zincone, 2006, p. 147). Nevertheless, these suggestions were unsuccessful (Arena et al., 2006). Italy's policy on nationality and migration is consistently characterised by continuity, regardless of the political situation. While it is accurate to state that only the political left has advocated for immigration through specific legislative measures in 2000 and 2006, the aforementioned evidence demonstrates that ultimately it succumbed to societal influence. Simultaneously, the political right, which has historically had more negative views towards immigration, is also prone to being influenced by lobby

groups due to its membership including Catholics and free market entrepreneurs. Immigration flows are not necessarily reduced under right-wing governments, and laws that are favourable to co-ethnic groups are not exclusively passed when a center-right government is in office (as shown in legislation 124/2006), but also under center-left governments (as seen in law 379/2000) (O. Vonk, 2012).

Overall, the Italian policy of dual citizenship will not change its preference for compatriots for a long time, because the Italian left is under social pressure, and the right is also susceptible to the influence of Catholicism and employers' associations. In addition, public opinion is to protect existing immigrants and give them more legal rights rather than welcoming more immigrants. It is very likely that Italy will continue to favour citizens of Italian descent in its citizenship policy in the future, with little attention to immigrants. It is possible for immigrants to immigrate legally, and the Italian government is willing to consider the integration of existing immigrants. However, immigration is not the primary focus of naturalisation and dual citizenship.

Furthermore, Italy has a particular focus on the fact that it has overseas constituencies, which serves to reinforce the long-standing tradition of the Italian dual citizenship policy favouring people of Italian descent. The distinction between 'ethnic' Italians and marginalised immigrants is also evident in the matter of suffrage. Italians abroad have the right to participate in Italian elections and are represented by certain individuals in the Italian national parliament (Sampugnaro, 2017). However, even suggestions to bestow voting privileges on non-Italian immigrants in local elections have not been enacted as legislation (O. Vonk, 2012).

Law 459/2001 came into effect on January 6, 2002, turning the idea of inherited citizenship into a real political link with Italy. This legislative move signified an official acceptance of the political and civic rights of Italians residing overseas, therefore changing the relationship between Italy and its expatriate community. With much rhetoric, the Italian Parliament passed the Bill underscoring the general agreement among the opposition as well as the majority. Legislators emphasised the historical significance of the Bill and speculated that it would be quite important in maintaining and extending the citizenship rights of the Italian diaspora (Bauböck & Faist, 2010; Tintori, 2009). Italians living abroad, who are represented by six senators and 12 MPs, are categorised into four distinct overseas constituencies according to Article 6 of legislation 459/2001: 1) Europe (including Russia and Turkey); 2) South America; 3) North and Central America; 4) Africa, Asia, Oceania, and Antarctica. Each constituency

is allocated one senator and one MP, while the remaining senators and MPs are split among the constituencies based on the number of Italian residents in each (Grosso, 2002).

Granting Italians living abroad the opportunity to vote may potentially strengthen the advantageous status of individuals sharing the same ethnic background. Given the existence of dedicated advocates to protect their interests, it is plausible that the co-ethnic preference of Italian dual citizenship policy will be advanced in the future (Zincone, 2006, p. 147). The senators representing Italians abroad played a crucial role in securing a majority for the coalition following the 2006 elections. Unless these senators, who clearly advocate for a greater emphasis on ethnicity in citizenship law, lose their influential political positions, it seems improbable that the ethnocentric approach of Italian dual citizenship policy will be altered (Arena et al., 2006, p. 360). The enfranchisement of Italians residing overseas has bolstered the political sway of fellow compatriots, augmenting their capacity to mould legislative results in Italy. This power is institutionalised by designating separate parliamentary seats for overseas Italians, guaranteeing their interests are directly addressed in the legislative process. Furthermore, these international delegates often support policies that prioritise the interests of people from the same ethnic background, which include advocating for dual citizenship policy that is more exclusive and biased towards Italian ethnicity (Zincone, 2006; Battiston and Mascitelli, 2008). Considering their crucial role in shaping and maintaining government alliances, it is probable that these legislators will persist in advocating for legislation that grants preferential treatment to individuals of Italian ancestry. This phenomenon generates a self-reinforcing loop, in which the political system becomes increasingly characterised by the prioritisation of ethnic identity, resulting in Italian ethnic groups receiving protected and privileged treatment within the national context.

In conclusion, the Italian overseas constituencies could contribute to a type of nationalism in Italy that excludes others. This situation is made more complex by the wider socio-political environment, where matters of immigration and integration continue to be controversial. The political influence wielded by Italians living abroad not only impacts internal legislation, but also has the capacity to shape Italy's position on wider matters like national identity and citizenship. Therefore, unless there is a substantial change in the political environment, the inherent preference for individuals of the same ethnic background under Italian dual citizenship policy is expected to

continue and potentially become stronger.

## **Conclusion**

Italy's dual citizenship policy is enshrined in Law no. 91/1992, which stipulates that Italian citizens are permitted to hold multiple citizenships, and that naturalised foreigners are not required to renounce their citizenship. Prior to 1992, Italy operated under a single citizenship policy, which prohibited individuals from holding more than one Italian citizenship. A number of internal and external factors have contributed to the implementation of the dual citizenship policy in Italy. These include emigration, evolving social norms (country image) and relations with neighbouring countries. With regard to emigration, the Italian government is more concerned with maintaining nationalist sentiment and the ties of these emigrants abroad to Italy. Italy's colonisation past also played a role, as the destination of emigration was often a country with which Italy had had a colonial relationship. The publication of the dual citizenship policy (91/1992) was accompanied by the enactment of two subsequent supplementary laws (124/2006 and 379/2000), which facilitated the restoration of Italian citizenship for those of Italian descent who had remained abroad due to colonial or war-related ties, while retaining their citizenship of their country of residence.

The progressive social norms, particularly *the Constitution of 1948*, prompted Italy to place greater emphasis on gender equality and civil rights. The previous citizenship policy of Italy, which emphasised descent, had previously afforded special treatment or legal interpretation space to emigrants, particularly male emigrants, and their descendants. The family model in the Italian citizenship law also permitted Italian citizenship to be passed on to these descendants until they obtained or restored Italian citizenship. However, with the progressive social norms and the popularisation of global norms, Law no. 91/1992 stipulates equal treatment for men and women in retaining dual citizenship policies, and regardless of gender, Italian citizens abroad can also pass on Italian citizenship to the next generation through descent. At the same time, because of the popularisation of human rights and the recognition of civil rights, all citizens should be treated equally. Those who have been naturalised as foreigners of non-Italian descent and have obtained Italian citizenship are also entitled to retain their previous citizenship.

Furthermore, Italy's friendly and peaceful relations with neighbouring countries also contributed to its dual citizenship policy. The friendly and peaceful relations with

neighbouring countries made Italy more comfortable and relaxed about opening up dual citizenship. After all, dual citizenship policies involve the movement of people and the opening of borders. The supranational organisation to which Italy belongs, the EU, also facilitated the opening up of Italy's dual citizenship policy. The framework for the free movement of people, goods and capital built by these European supranational organisations required Italy to recognise the rights of people from other member states and to provide them with certain benefits, including the right to work and reside there. Italian citizens, meanwhile, enjoy the same equal rights and benefits in the remaining member states. Furthermore, when Italy adopted the policy of dual citizenship, 65% of the countries in the region had already done so. This is also related to the policy's contagion effect, which has the potential to facilitate regional integration, political or economic integration, and the management of migration flows.

However, in practice, the implementation of Italy's dual citizenship policy is not as straightforward as it may appear. It is indeed very favourable to overseas citizens of Italian descent, while it has very strict naturalisation conditions for immigrants of non-Italian descent and non-EU member states. This renders Italy's dual citizenship policy a potentially "conditional" dual citizenship policy. Italian policymakers often espouse the view that migration flows bring physical and human capital to the country, which can facilitate its development. However, the contribution of immigrants (in particular those of non-Italian and non-EU origin) who opt to remain in Italy and contribute to the expansion of the Italian market and economy is frequently disregarded. This is in contrast to emigrants who live abroad and may not even return to Italy. Due to the political context in Italy, the left and right often concur on migration policy. Consequently, the inclination towards individuals of Italian descent in Italy's dual citizenship policy and the lack of consideration for non-privileged immigrants is unlikely to change in the near future. Furthermore, Italy has overseas constituencies, and Italians abroad are able to safeguard their interests through their voting rights in parliament. This serves to maintain and reinforce the preference for compatriots in Italy's dual citizenship policy.



## **CHAPTER 11**

### **CONCLUSIONS**

By 2019, over two-thirds of the world's countries had adopted dual citizenship policies. After World War II, over one-third of all countries transitioned from a single citizenship policy to a dual citizenship policy. This thesis has sought to explain the variation in citizenship policy across different countries by identifying the factors associated with single or more tolerant dual citizenship. The analytical framework proposes nine potential determinants: physical capital, human capital, relations with neighbours, country image, regime type, political stability and governance, immigration levels, emigration levels, and colonisation experience. The analysis included 195 UN-recognised countries. The single-case study selects Italy as a typical case.

This chapter summarises the main findings and the theoretical and empirical contributions of this thesis. The implications for broader issues in political science, with an emphasis on migration networks, governance and resilience, and identity construction, are discussed next. After considering the thesis's limitations, the discussion concludes with suggestions for further research on this topic.

#### **11.1 Summary of Key Findings and Contributions**

This study has revealed that a variety of political, social, and international factors have influenced citizenship policies, particularly those allowing dual citizenship. Some factors' influence amplifies previous studies' findings, while others do not influence citizenship policy as much as previous studies suggest. Their influence may have evolved over time as the global political landscape and norms changed. This analysis pushes the boundaries of traditional theoretical approaches to citizenship policy. By investigating the potential impact of political, social, and historical factors, the study offers a nuanced and dynamic understanding of citizenship policy that can shape future academic discourse in the field. It also provides empirical contributions regarding countries' strategic tools, the practical dimension of policy transition, and the creation of a dataset.

##### **11.1.1 Theoretical contributions**

This thesis makes major advancements in the theoretical discourse on citizenship policy

and migration studies through two important results. Firstly, this study demonstrates that in an increasingly interconnected world, external factors have begun to exert a greater influence on a country's citizenship policy compared to internal factors. Global norms, international agreements, and transnational dynamics are progressively forming governments' citizenship policies as they participate in deeper international relations and meet cross-border issues. This viewpoint emphasises the need of realising citizenship policies inside the larger context of international relations and globalisation theories rather than only from a domestic point of view.

Secondly, even if outside influences are becoming more and more important, a country's citizenship policy is still much shaped by internal elements. This study clarifies how historical legacies and modern developmental goals inside a state help to explain its position on the dual citizenship policy. These internal elements could result from a country's socio-political past, identity politics, demographic concerns, and economic policies. The interaction between the historical background of a country and its present goals emphasises the complexity of policy making in which internal and external elements are not mutually exclusive but rather dependent.

Regarding the external factors, the findings in this study advance the theoretical understanding of how international relations could shape citizenship policy, enriching the theory by demonstrating that good bilateral relations and a positive country image favour the implementation of a dual citizenship policy. One strand of thought within migration studies emphasises the importance of political and social connections between countries (Castles et al., 2013; Faist, 2000a; Portes, 1997). This perspective suggests that these connections can significantly influence migration patterns and the experiences of migrants. Charoenwong, Kwan, and Pursiainen explored the role of political connections in relation to compliance with mobility restrictions during the COVID-19 pandemic. They found that countries with more political and social connections to China and Italy (as the first countries with major COVID-19 outbreaks), had nearly 50% higher compliance with mobility restrictions imposed by their governments (Charoenwong et al., 2020). This suggests that political and social connections can serve as conduits of information about significant events and can even influence behaviour across borders. Good relations with neighbouring countries encourage countries to choose a dual citizenship policy. In other words, peaceful relations with neighboring countries can help a country lower its guard and more comfortably adopt a policy of dual citizenship, thereby facilitating mutual development.

Both statistical analysis and case studies support this finding.

In the case study of Italy, the political and economic integration and European citizenship promoted by European supranational organisations encouraged Italy to move to a dual citizenship policy in the early 1990s. Adzhba's research also aligns with this finding. She begins by noting the increasing prevalence of dual or multiple citizenships, arguing that this phenomenon affects the interests of several states, necessitating interstate interaction, which is often expressed through bilateral and multilateral treaties on dual or multiple citizenships (Adzhba, 2016). It can be seen that good bilateral relations and supranational organisations can facilitate the implementation of dual citizenship policies, as the latter enable effective cooperation between states and even regional integration. The policy contagion effect also seems to be playing a role here. Countries are influenced by the dominant citizenship policies in the region (Berry & Berry, 2018; Marsh & Sharman, 2009; Shipan & Volden, 2008), like the EU. Although this is a control variable in the present study, the policy contagion effect has been demonstrated in the empirical research of this thesis, both in the statistical analysis and in the case study, to exert an influence on the citizenship policies of countries. The present findings corroborate the role of international relations in shaping a country's specific citizenship policies.

In addition, this study finds that countries following global norms—those which respect civic and human rights—are more likely to implement dual citizenship policies. Maintaining a good country image often motivates one to follow these global norms. Respect of human rights and support of civil liberties helps countries to be progressive and inclusive, therefore improving their worldwide position. According to Shachar (2009), governments that defend liberal democratic norms, such as accepting dual citizenship, are increasingly respected by the international community. Such countries are regarded to have a better appeal to immigrants, entrepreneurs, and foreign partners, which reinforces their commitment to these principles. The findings are consistent with constructivist concepts, which emphasise the role of norms and values in shaping state action (Finnemore & Sikkink, 1998). It broadens the constructivist perspective to include migration studies, emphasising how global norms influence citizenship policy.

Meanwhile, this thesis underlines the strategic issues guiding citizenship policies. The acceptance of dual citizenship by countries reflects not only their moral standards but also a calculated move to increase their global competitiveness and future economic possibilities. This point of view is compatible with the political economy theory of

migration, which looks at the strategic and financial motivations behind governmental activities (Hollifield, 2004). Countries that position themselves as modern, inclusive, and globally involved are more likely to implement dual citizenship legislation. This projection is consistent with their overall development goals, which include recruiting skilled migrants, stimulating innovation, and improving international cooperation (Kivisto & Faist, 2009). These countries display their dedication to include many points of view into their social fabric and their openness to accept world talent by granting dual citizenship. Moreover, rules on dual citizenship could be considered as a strategic tool for national growth. They let countries benefit from the possibility for cultural interaction, economic growth, and artistic expression inherent in their diaspora. Dual citizens, according to Faist (2000), serve to strengthen worldwide networks, therefore facilitating trade, investment, and information movement. This transnational side of citizenship emphasises how strongly national policy depends on global economic dynamics.

Regarding the internal factors, this thesis confirms the colonialism-citizenship nexus, aligning the historical institutionalism. This finding has a wide range of theoretical implications for migration and citizenship policy. First, they demonstrate the extent to which historical legacies impact present citizenship policies. The experience of colonisation, whether as a colonist or a colony, has a permanent impact on national identity and policy frameworks. This historical perspective enriches the understanding of the factors influencing citizenship policies, moving beyond the conventional focus on economic and political determinants (Amighetti & Nuti, 2016; Bauböck, 2003a; F. Cooper, 2022; Faist, 2004). Many times, colonisation produces diverse and cosmopolitan communities that call for more inclusive citizenship policies to fit many identities and affiliations. Particularly former colonies may choose dual citizenship in order to honour the various identities of their populations—typically including indigenous communities, descendants of colonists, and persons of mixed heritage—which often reflect their own (F. Cooper, 2022; Spiro, 2016). Countries with colonisation histories have embraced dual citizenship to keep ties to their diasporas and acknowledge the several identities of their residents. This inclusiveness shows a respect of the historical complexity (Amighetti & Nuti, 2016; F. Cooper, 2022; Escobar, 2004).

Second, the finding emphasises the need of dual citizenship as a strategy for preserving international ties and controlling variation. Dual citizenship policies help to integrate heterogeneous communities and maintain transnational relationships in both

colonial powers and former colonies. Dual citizenship policies allow former colonial powers to maintain political, cultural, and financial ties to their former colonies. Often kept by migration, trade, and diplomatic contacts, these links need for adaptable citizenship policies (Shachar, 2009). One could consider this effort as part of a larger scheme to keep control and sustain authority among former colonies. Former colonial governments provide dual citizenship so that their nationals may remain close to their native country and yet absorb into the civilization of their countries of residence. Representing the continuity of historical links in a modern context, this dual identity has the ability to develop cultural linkages, encourage economic collaboration, and improve bilateral relations (Bauböck, 2007).’

Another theoretical contribution under the internal factors category is about the neoclassical economic theories of migration. The study determines the relevance of economic factors to countries' citizenship policies. The findings indicate that there are links between physical capital and the adoption of dual citizenship policies. These findings align with neoclassical economic theories of migration, which suggest that wealthier countries with more opportunities will naturally attract immigrants (Borjas, 1989; Massey et al., 1993; Stark & Bloom, 1985). Migration is a response to both labour market needs and economic incentives. Migration flows react to economic incentives, mainly with regard to the labour market. In this process, individuals are likely to move from areas of low economic opportunity to areas of higher economic opportunity (Hooghe et al., 2008). De Haas, Fokkema, and Fihri (2015) further elaborate that return migration is the logical stage after migrants have earned sufficient assets and knowledge to invest in their countries of origin. Potential economic benefits often influence the strategic decision to migrate.

This study has shown that governments accept those arguments and adjust their citizenship policies to facilitate immigration and return emigration's investment. Although countries with lower economic development may be less attractive to immigrants, those countries may still decide to adopt dual citizenship policies as a socio-political strategy and a calculated economic move aimed at fostering growth and development. The desire to stimulate economic growth and enhance physical capital could significantly influence a country's adoption of a dual citizenship policy. Attracting individuals who are likely to bring more physical capital investment enhances the country's economy and overall competitiveness. This study broadened the scope of neoclassical economic theories of migration by investigating the impact of

physical capital on citizenship policy. Although these theories suggest that wealthier countries with more opportunities will naturally attract immigrants, countries with lower economic development may adopt dual citizenship policies as a social or political strategy, or even as a calculated economic move to attract investments in order to foster growth and development.

Overall, this study provides substantial advances to the theoretical comprehension of citizenship policy. It suggests that in a world that is becoming more interconnected, factors from outside a country, such as international conventions and contacts between different countries, now have a greater impact on influencing a country's policies regarding citizenship than elements within the country itself. However, internal considerations, such as historical legacies and current developmental aspirations, are still important in determining whether a country adopts a single or dual citizenship policy. The study emphasises the interaction of internal and external elements, resulting in a comprehensive framework for understanding citizenship policy. This dual-focus strategy provides valuable insights for scholars and policymakers in political science, migration studies, and international relations.

Last but not least, this thesis contributes to the complicated theory between migration and citizenship policy. The statistical and comparative analyses show that countries with low immigration levels often have a dual citizenship policy; countries with low emigration levels often have a dual citizenship policy. The single case study reveals that relatively high emigration and immigration levels lead to adopting a dual citizenship policy. The study seems to present a complex scenario with conflicting results between the quantitative analysis and qualitative analysis, but actually, they describe different aspects or temporal stages of the relationship between migration levels and dual citizenship policies. The divergence on migration offers a rich opportunity to deepen the analysis and contribute to the existing literature.

Policies often take time to produce noticeable effects. There could also be a time lag in the effects. High levels of migration may trigger the adoption of dual citizenship policies, but it may take years for the new policies to affect migration rates. Through a sequential lens, high levels of immigration often bring economic benefits, such as an increased labour force, diversity of skills and talents, and increased consumption, leading to economic growth. Allowing dual citizenship can make the country more attractive to skilled migrants. High levels of immigration can also create political and social pressure to formalise the status of immigrants. Offering dual citizenship may be

a compromise between tighter immigration control and a more liberal approach. Meanwhile, dual citizenship can be seen as a tool to better integrate immigrants, making them feel more welcome and less transient, which in turn could lead to a more stable society.

After an initial period of high immigration and the adoption of a policy of dual citizenship, a country may reach a saturation point, leading to tighter immigration controls and thus a decline in immigration levels. The very factors that made the country attractive to immigrants may change. For example, job opportunities may decrease or the cost of living may increase, making the country less attractive to potential immigrants. There may also be social pressures. As the number of immigrants (and now dual citizens) increases, there may be social and political pressure to reduce immigration rates because of concerns about cultural integration, resource strain or national security. The availability of dual citizenship may lead potential immigrants to perceive the process as more difficult or selective, thereby discouraging lower-skilled or less confident migrants.

A country with high levels of emigration may face a brain drain. Countries with high levels of emigration, particularly of skilled workers, may adopt dual citizenship policies in an attempt to maintain links with their expatriate communities. The hope is that these individuals will contribute in some way to their home country, even while living abroad. High levels of emigration also often result in significant remittance flows back to the home country. Dual citizenship can facilitate this process by making it easier for emigrants to work and live abroad. Diaspora diplomacy could also be considered. Countries can use their overseas communities to gain diplomatic and trade advantages. Dual citizenship allows easier movement between host and home countries, enhancing these potential benefits. In some cases, high levels of emigration can be politically sensitive. Offering dual citizenship can be a way for governments to show that they are doing something to maintain ties with their citizens abroad. Allowing dual citizenship can be a way of maintaining cultural and social links with emigrants, ensuring a degree of cultural continuity and community cohesion.

The decline in emigration following the adoption of dual citizenship may initially be due to increased ties with the home country. Dual citizenship may make emigrants feel more connected to their home country, providing them with an emotional or psychological anchor that may make them more reluctant to sever ties completely. Dual citizenship policies make it easier for emigrants to return to their home country, whether

for visits or to return permanently, without losing their status in the host country. Knowing that it is easier to return may make emigrants less likely to leave in the first place. Second, as noted above, remittances are an important factor. But dual citizenship can also encourage diaspora investment and entrepreneurship in the home country, improving economic conditions and making emigration less attractive. Third, dual citizenship often provides some form of legal protection and social security, such as access to health care and education in the home country. This safety net can discourage further emigration. In terms of political stability, the adoption of dual citizenship policies can be seen as a progressive and stabilising political move. This can lead to increased public confidence in governance and, as a result, lower levels of emigration. Therefore, what may appear to be a contradiction may only be a snapshot of an evolving situation.

It's important to note that these are generalised scenarios and that the actual dynamics may be more complex and situation specific. The sequential lens is only one way of interpreting the conflicting results between the quantitative statistical analysis and the single case study of Italy. It's also possible that other variables influence these results. Dual citizenship policies may not be the only factor influencing migration levels. For example, if a country introduces dual citizenship but also improves its economy or security situation, lower emigration levels may be due to these other factors rather than to the dual citizenship policy alone. Migration trends and policies are not static; they can change over time as a result of various internal and external factors. Moreover, Italy, chosen for the case study, may have specific characteristics that make it unique and that have not yet been identified in this thesis. These could be temporal, geographical, economic, or social factors that cannot necessarily be generalised to other countries.

In summary, while the findings between migration levels and citizenship policy may appear to contradict each other at first sight, on closer examination they may reveal complex dynamics or different stages in the relationship between emigration levels and dual citizenship policies. Further research could be planned to disentangle these relationships and understand the mechanisms at play.

### 11.1.2 Empirical contributions

Regarding the first empirical contribution, the study has found that rather than merely reflecting a country's history or identity, a dual citizenship policy can be a strategic tool used to pursue a variety of national goals and interests. For example, the acquisition of



more physical capital helps a country in achieving economic development. Dual citizenship allows the fluid movement of individuals between countries, promoting the exchange of ideas, skills, and investment, thereby contributing to the development of these forms of capital (Rubenstein, 2007; Schierup et al., 2008). The growth of physical and human capital contributes to a country's economic strength, increases its workforce, addresses low marriage and fertility rates, and balances the ageing population, thus helping to facilitate the economic development described above. Therefore, the connection between higher physical capital and dual citizenship policies suggests that these policies form part of strategic national agendas to drive economic growth and social advancement (Harpaz, 2019; Knott, 2019).

Good relationships with neighbouring countries may facilitate the negotiation of the complexities involved in the administration of dual citizenship, such as taxation, social security, and other legal obligations. Sharman (2009) has suggested that the onus was on citizens to show why governments should not have access to their personal financial information, rather than governments having to show why they should. In the context of dual citizenship, this shift in the relationship between the state and the individual regarding financial privacy could potentially complicate matters as individuals may have to navigate different regulatory environments and expectations of financial transparency in their home and host countries. Good relationships with neighbouring countries could facilitate the negotiation of these complexities by promoting mutual understanding and cooperation among regulatory authorities, thereby making it easier for dual citizens to understand and meet their legal obligations in both countries (Sharman, 2009).

Concerning the second empirical contribution, the focused examination of Italy's transition from a single to a dual citizenship policy has added a practical dimension to the theoretical framework and theoretical contributions mentioned above, thus enhancing the understanding of the dynamics of policy change in a specific context. This has helped to build a granular view of how various factors can contribute to such a policy shift. The case study of Italy uncovers sentimental elements and nationalism that were not present in previous quantitative analyses and are difficult to quantify. Because Italy wants to maintain contact with emigrants overseas and wants to retain many Italians of overseas descent, it adopted a dual citizenship policy. With the advancement of social norms, the implementation of gender equality, and the increasing respect for human rights and civil rights around the world, Italy has made the exception

of dual citizenship for certain groups of people universal and legislated that all Italian citizens have the right to dual citizenship, including those naturalised immigrants. In this case, the relationship with neighbouring countries plays a role, especially since Italy is also in the EU. Regional dynamics have begun to increasingly affect Italy's dual citizenship policy, including the policy's contagion effect.

However, contrary to the statistical and comparative analyses that suggest that low immigration levels or emigration levels favour having a dual citizenship policy, Italy's relatively high emigration and immigration levels encourage Italy to adopt a dual citizenship policy. However, for non-privileged immigrants, Italy's political regime and parties prioritise legalisation over granting them the right to naturalisation and dual citizenship. This makes Italy's dual citizenship policy seem "conditional." In the dual citizenship policy, the Italian oversea constituencies reinforce the preference for co-ethnics, and the specific Italian context—political regime and parties—makes it likely that this preference will not disappear for a long time.

The single case study adds nuance to these findings by providing insights into the relationships outlined by the statistical analysis. It can be seen that some factors associated with citizenship policy in the big picture could subtly change in the context of individual countries, providing different strategic implications for specific countries. Italy is a valuable and representative example of a country transitioning from a single to a dual citizenship policy, and this case study provides a detailed, contextual exploration of how and why a country might shift from a single to a dual citizenship policy, and why it appears to be "conditional." It shows a country adjusting its citizenship policy in response to economic and social pressures, as well as international influence, thus revealing that countries can and do change their citizenship policies based on evolving circumstances and needs.

As such, the case study presents a detailed narrative of such a transition and offers concrete data and analysis that future scholars can use to understand similar transitions. As Soysal (1994) found when exploring the changing nature of citizenship in Europe, the influence of migration and international human rights norms were important. The evolving nature of citizenship and the importance of context, whether historical or situational, shapes citizenship practices and policies (Bloemraad, 2006). The case study of Italy in this thesis can help future scholars to understand similar transitions and adds empirical evidence and suggestions for countries' strategies.

Turning to the third empirical contribution, including 195 countries into my sample

gives an unparalleled worldwide viewpoint on dual citizenship policies. This all-encompassing strategy makes it possible to examine many political, social, economic, and historical settings. It offers a more complex knowledge of the reasons behind countries' adoption or rejection of dual citizenship policy. Policymakers, researchers, and professionals could grasp and negotiate the complexity of dual citizenship policies worldwide depend on such generalisability. In addition, a big and varied sample raises the possibility of finding fewer clear trends and connections. This study shows, for example, how historical colonial relationships, migration patterns, and regional dynamics affect dual citizenship policies. Understanding the intricate network of elements influencing national citizenship policy depends much on these kinds of findings. At last, the empirical result of the comprehensive sample reaches into pragmatic policy consequences. The results of this thesis can help policy makers create better informed and successful citizenship policies. Knowing the elements related to dual citizenship as shown by my worldwide study would enable governments to balance national interests with the rights and demands of their people in a world growingly linked.

## **11.2 Implications for Broader Issues in Political Science**

This thesis also supports the study of broader issues in political science. This section discusses three issues in political science that this thesis can support and influence more broadly by extending its own conclusions: migration networks, governance and resilience, and identity construction. The variation in citizenship policy studied here, i.e., the shift from single to more tolerant dual citizenship, may influence transnational connections of migrants. Understanding variation in citizenship policy could provide insights into how changes in citizenship policy affect governance and resilience. Moreover, variation in citizenship policy may influence the diffusion and adoption of models of actor agency and rights. Factors associated with single or dual citizenship policies may influence political socialisation through the formation of political preferences.

First, this study on the factors associated with the variation in citizenship policy, specifically the choice of a single or dual citizenship policy, has contributed to the discussion on transnationalism and migration networks. Migrants often live their lives in more than one nation-state, becoming connected through social linkages and various forms of identity to their host country, while also maintaining connections to

organisations, communication systems, families, and identities that extend transnationally (Glick Schiller et al., 2004). Citizenship policies can either facilitate or hinder these mobilities, affecting the formation and maintenance of transnational networks. The mobilities include, but are not limited to, large-scale movements of people, objects, capital, and information across the world, as well as the more local processes of daily transportation, movement through public spaces, and the travel of material things within everyday life (Haas, 2010; Hannam et al., 2006).

Ethnic identities and cultures are maintained and transformed in different diasporas (Lidskog, 2016), and citizenship policies can play a crucial role in shaping these processes. In countries with dual citizenship policies, less privileged and less integrated immigrants (such as Nigerian migrants living in transit-like situations in Istanbul) sometimes find upward social mobility not through onward migration to Europe but in getting involved in a different form of mobility, via informally arranged transnational trade between Turkey and West Africa (Schapendonk, 2013). Moreover, emigrating businessmen who have a strong incentive to return to their home country may bring back many investments and considerable capital; indeed, the Senegal government refers to such (returning) emigrants as ideal returnees. Studies have found that such ideal returnees are rooted in transnational relationships with the former country of immigration (Sinatti, 2019). Their motivations to return and invest depend on the sustainability of such relationships. In this scenario, dual citizenship policies are often a crucial step or prerequisite for achieving such sustainable relationships. Citizenship policies thus shape the experiences of migrants and the impacts of migration on development.

Dual citizenship policies can, to some extent, facilitate the ability of migrants to maintain ties with their country of origin, while single citizenship policies can, conversely, hinder the ability of migrants to maintain ties with their country of origin. In contrast, a single citizenship policy or stricter requirements for dual citizenship can deter families from naturalising, potentially impacting upon the integration of immigrant families and their contributions to the host country's development (Labussièrè & Vink, 2020). To sum up, this study on citizenship policy provides a crucial legal and policy perspective in the discussion on transnationalism and migration networks. It helps to illuminate how legal and policy frameworks can shape the experiences of migrants, their ability to maintain transnational connections, and the impacts of migration on national and international development.

Second, this study has contributed to the theme of governance and political resilience in societies. Previous research refers to governance and the capacity to manage resilience in regional social-ecological systems (Berkes, 2017; Garmestani & Benson., 2013; Lebel et al., 2006). These (and other) researchers have argued that governance systems that were able to adapt to change and manage resilience were crucial to the sustainability of social-ecological systems (Armitage, 2008; Berkes, 2017; Lebel et al., 2006). Citizenship policies, as part of the broader institutional environment, can shape these governance systems. That is, dual citizenship policies might influence the capacity of governance systems to manage resilience by facilitating the mobility of people, ideas, and resources across borders.

The concept of mobilities referred to here, as has been mentioned before, encompasses both large-scale movements of people, objects, capital, and information across the world, as well as the more local processes of daily transportation, movement through public space, and the travel of material things within everyday life (Hannam et al., 2006). Citizenship policies can shape these mobilities (and immobilities), influencing the resilience of regional social-ecological systems. In addition, Joseph (2013) added stability as an aspect of neoliberalism and suggested a new governmental approach. Citizenship policies, therefore, could shape neoliberal forms of governmentality that emphasise individual adaptability, influencing the capacity to manage resilience in regional social-ecological systems. Citizenship policies could be used to enhance the effectiveness of regulatory enforcement, including the ability to manage stability in regional social-ecological systems (Dewey & Di Carlo, 2022; Magat & Viscusi, 1990; Mustchin & Martínez Lucio, 2020).

Third, this thesis has contributed to knowledge regarding the construction of identities in the field of political socialisation. It aligns with the work of Meyer (2010), who discusses world society, institutional theories, and the actor. It has been argued that actor identities are constructed in an increasingly comprehensive and global cultural context (J. W. Meyer, 2010). As part of the broader institutional environment, citizenship policies can shape these actor identities. For instance, dual citizenship policies might influence how individuals construct their own identities, by allowing them to identify with more than one nation-state. A specific example is children's citizenship. Lister (2007) explored why children's citizenship with reference to "where", "when", and "how children". This study on citizenship policies shows how they can be used to shape the rights and responsibilities of children, influencing their identities as

actors and their understanding of their agency and rights. Having a sense of belonging to two nations can lead to a complex, multifaceted political identity in that dual citizens may feel a sense of loyalty and obligation towards both countries, which can influence their political behaviour. For example, they may be more likely to vote, engage in political discussions, and participate in political activism in both countries (de Wit, 2020).

Citizenship policies may also shape the experiences of transnational citizens, influencing their identities as actors and the diffusion and adoption of models of actor agency and rights (Fox, 2005; Mundy & Murphy, 2001). When dual citizenship policies are in place, being part of two political systems can expose individuals to different political ideologies, practices, and debates, which can shape their political beliefs and attitudes as a result. For instance, a dual citizen of the United States and Sweden may develop a more nuanced understanding of issues like healthcare and social welfare, given the significant differences in how these issues are addressed in the respective countries. This exposure can foster critical thinking and political engagement, which are key aspects of political socialisation (Biesta, 2009). Citizenship policies can also shape opportunities for political participation, influencing the political socialisation of different genders (Coffé & Bolzendahl, 2010). For example, dual citizenship policies could enable greater political participation among women, contributing to closing gender gaps in political participation.

Citizenship policies can also shape the experiences of diasporas, influencing their political socialisation and relationship with the nation-state (Cohen, 1996; Hansen & Weil, 2002). Dual citizens may pass on their unique political experiences and perspectives to their children, influencing the latter's political socialisation and affecting intergenerational political socialisation. This is likely to lead to a more diverse and inclusive political culture in the long run, further fostering political participation and integration (Bauböck, 2003; Sapiro, 2004). Overall, actor identities are constructed in the wider and now global cultural context. Citizenship policies, as part of the broader institutional environment, can shape these actor identities, influencing the political socialisation of individuals.

### **11.3 Limitations of This Study**

This study has some limitations which must be acknowledged here. First, in terms of the indicators of the variables analysed statistically, factors could have been measured

in different ways. Thus, the indicators relating to them discussed in this thesis might only measure one side of them. There might be other indicators that can more accurately and comprehensively measure these factors. This thesis cannot guarantee that the most accurate indicator has been found to measure these factors or variables. For instance, the analysis used “Global Freedom Scores” to measure country image based on the Freedom House database. Freedom House rates people’s access to political rights and civil liberties to generate a total score and status. If a country has high global freedom scores, it usually has a favourable image due to its high level of defence of political rights and civil liberties. This thesis may be more reflective of mainstream Western norms, which espouse the values of freedom and democracy. However, it failed to consider other values and aspects that could be associated.

Second, in the single case study of Italy, the evidence was mainly drawn from the minutes of the Senate of the Republic and the Chamber of Deputies meeting in the Italian Parliament. The minutes of Italian parliamentary meetings are generally made public, but the level of detail and accessibility they possess can vary depending on the type of meeting and the specific circumstances. Most of this study analysed records of parliamentary committees which held meetings to discuss particular topics, draft legislation, and conduct inquiries. However, limitations exist since the minutes of committee meetings can vary in terms of public availability. Some committee meetings may have their minutes published and accessible to the public, while others may have restricted access or limited publication. This can depend on the sensitivity of the topics discussed and even on the decisions made in the committee meetings.

In addition, due to the time and monetary constraints of the research, insufficient information was accessed from the Italian media. Only a few mainstream Italian media outlets (e.g., *la Repubblica*, *Corriere Della Sera*) were consulted for their coverage of the dual citizenship policy. Meanwhile, the absence of interviews with the decision-makers who were in charge of the citizenship policy was another potential weakness. Interviews with some of them could have provided more direct and first-hand information about why Italian policymakers at the time proposed this change in citizenship policy and why it was passed. This has implications for future research, as will be detailed in the next section.

#### **11.4 Avenues for Further Research**

This section offers suggestions on addressing the limitations to this research that the

last section identified. It also highlights other directions or approaches that could be explored, and new questions or hypotheses arising from this research that could be further investigated.

In response to the first point raised in the limitations section regarding the variable measurement, it would be possible to spend more time browsing the reports of authoritative or international organisations, as well as purchasing and subscribing to the reports of international organisations, to find better indicators with which to measure a country's image. In response to the second point raised in the limitations section, if more time and money were available (and the researcher's linguistic skills were up to the task), the study could look at more Italian media sources (e.g., La Stampa, ANSA) to obtain more evidence pertaining to the Italian case study. Alternatively, it is not necessary to limit oneself to websites as the archives of the relevant Italian media firms could have been consulted to find first-hand reports (in the period 1985-1992) on the Italian single and dual citizenship policies. This would have provided more information than can be found on the internet and would have been more informative - because it is the newspaper's own original records that are kept. In addition, it may have been possible to invite the policymakers who proposed the dual citizenship bill at the time to interviews. Getting a first-hand account of the reasons and considerations that led Italy to change from a single to a dual citizenship policy would have been more direct, assuming they were available and willing to participate. It would also have been possible to organise focus groups and invite members of parliament who voted for dual citizenship to interviews about why they agreed and supported Italy's move to a dual citizenship policy at the time. This would have been a way to access their views on each other's opinions in the focus group, which would have provided more information for this study.

With regard to new hypotheses arising from this research that could be further investigated, the statistical analysis of this study reveals that there is a relatively strong statistical relationship between the contagion effect and the choice of citizenship policy. The dominant citizenship policy type of a region affects the likelihood of the country in that region adopting that particular type of citizenship policy, such as a dual citizenship policy. Although the contagion effect was briefly discussed in the case of Italy in the single country analysis, the discussion was more based on the friendly relationship with neighbouring countries and the presence of the EU. Given the relatively strong statistical relationship found in this study, it is worth exploring the



contagion effect in more depth in the future. This could involve investigating its relationship with citizenship policy or dual citizenship policy, rather than simply being a control variable in this thesis. Relevant quantitative analysis could include interviews and field research.

As for other directions or approaches that could be explored on the topic, one relevant question is: why do some countries (around 30% countries in the world) maintain single citizenship policies in a global climate where dual citizenship policies predominate? It would be worth examining the specific reasons why these countries still maintain single citizenship policies. In addition, the research questions could include why some countries have even converted from a dual citizenship policy to a single citizenship policy when conversion to a dual citizenship policy has been the norm, and what factors influenced such a switch. As of 2019, only 1% of countries have changed from dual to single citizenship policies. In examining these extreme cases, it may be demonstrated that they constitute interesting and reliable tests. Nevertheless, there may be difficulties in obtaining internal country data and government reports for these countries, which presents both an opportunity and a challenge for future research.

## APPENDICES

### Appendix 1: Sixty-Seven Countries Changed Citizenship Policy from Single to Dual During 1945–2019

Albania
Algeria
Angola
Armenia
Australia
Belgium
Belize
Benin
Bolivia
Brazil
Burundi
Cabo Verde
Canada
Chile
Comoros
Costa Rica
Cuba
Czech Republic
Denmark
Djibouti
Dominican Republic
Ecuador
Egypt
El Salvador
Fiji
Finland
France
Ghana

Haiti
Honduras
Iraq
Italy
Kenya
Lesotho
Luxembourg
Mali
Malta
Mauritius
Mozambique
Niger
Nigeria
Panama
Peru
Philippines
Romania
Rwanda
Saint Vincent and the Grenadines
Samoa
Sao Tome and Principe
Seychelles
Sierra Leone
Slovenia
Solomon Islands
South Africa
Spain
Sudan
Sweden
Switzerland
Timor-Leste
Tonga

Trinidad and Tobago
Tunisia
Tuvalu
Uganda
Uruguay
Zambia
Zimbabwe

**Appendix 2: One Hundred and Thirty-Four Countries with Dual Citizenship Policies in 2019**

Albania
Algeria
Angola
Antigua and Barbuda
Argentina
Armenia
Australia
Bahamas
Barbados
Belarus
Belgium
Belize
Benin
Bolivia
Bosnia and Herzegovina
Brazil
Bulgaria
Burkina Faso
Burundi
Cabo Verde
Cambodia
Canada
Chad
Chile
Colombia
Comoros
Congo - Brazzaville
Costa Rica
Croatia
Cuba

Cyprus
Czech Republic
Denmark
Djibouti
Dominica
Dominican Republic
Ecuador
Egypt
El Salvador
Fiji
Finland
France
Gabon
Gambia
Ghana
Greece
Grenada
Guatemala
Guinea
Guinea-Bissau
Haiti
Holy See
Honduras
Hungary
Iceland
Iran
Iraq
Ireland
Israel
Italy
Jamaica
Jordan

Kenya
Kiribati
Korea (Democratic People's Republic of)
Kyrgyzstan
Laos
Lebanon
Lesotho
Liechtenstein
Luxembourg
Malawi
Maldives
Mali
Malta
Mauritius
Mexico
Moldova
Mongolia
Morocco
Mozambique
Namibia
Nauru
New Zealand
Nicaragua
Niger
Nigeria
North Macedonia
Norway
Palau
Panama
Paraguay
Peru
Philippines

Poland
Portugal
Romania
Russia
Rwanda
Saint Kitts and Nevis
Saint Lucia
Saint Vincent and the Grenadines
Samoa
Sao Tome and Principe
Serbia
Seychelles
Sierra Leone
Slovenia
Solomon Islands
Somalia
South Africa
South Sudan
Spain
State of Palestine
Sudan
Sweden
Switzerland
Syria
Timor-Leste
Tonga
Trinidad and Tobago
Tunisia
Turkey
Turkmenistan
Tuvalu
Uganda



United Kingdom
United States
Uruguay
Venezuela
Vietnam
Yemen
Zambia
Zimbabwe

### Appendix 3: Sixty-one Countries with Single Citizenship Policies in 2019

Afghanistan
Andorra
Austria
Azerbaijan
Bahrain
Bangladesh
Bhutan
Botswana
Brunei
Cameroon
Central African Republic
China
Congo - Kinshasa (DR)
Cote d'ivoire
Equatorial Guinea
Eritrea
Estonia
Eswatini
Ethiopia
Georgia
Germany
Guyana
India
Indonesia
Japan
Kazakhstan
Kuwait
Latvia
Liberia
Libya
Lithuania

Madagascar
Malaysia
Marshall Islands
Mauritania
Micronesia
Monaco
Montenegro
Myanmar
Nepal
Netherlands
Oman
Pakistan
Papua New Guinea
Qatar
San Marino
Saudi Arabia
Senegal
Singapore
Slovakia
South Korea
Sri Lanka
Suriname
Tajikistan
Tanzania
Thailand
Togo
Ukraine
United Arab Emirates
Uzbekistan
Vanuatu

**Appendix 4: Spearman's Rank Correlation Coefficient**

	DV	IV1.1	IV1.2	IV2.1	IV2.2	IV3	IV4	IV5	IV6.1	IV6.2	IV7	IV8	IV9	CV1	CV2	CV3	CV4	CV5
DV	1	.166*	-0.046	0.074	0.12	-0.059	.160*	0.131	0.043	-0.039	-0.003	0.13	0.107	.297**	-0.042	-.159*	.181*	0.114
IV1.1	.166*	1	-.251**	0.083	.150*	0.04	0.116	0.043	.181*	0.095	0.104	.218**	.158*	-0.081	-.258**	0.107	.164*	0.02
IV1.2	-0.046	-.251**	1	.473**	.384**	-0.151	0.052	.397**	-0.137	.367**	0.081	-.430**	-0.135	.260**	.593**	.269**	.240**	0.031
IV2.1	0.074	0.083	.473**	1	.816**	-.248**	.580**	.603**	.591**	.828**	.533**	.190**	-.150*	0.118	-0.121	.208**	.272**	.206**
IV2.2	0.12	.150*	.384**	.816**	1	-.229**	.627**	.668**	.520**	.700**	.331**	.323**	-0.121	0.088	-.178*	.156*	.377**	.272**
IV3	-0.059	0.04	-0.151	-.248**	-.229**	1	-.593**	-.576**	-.564**	-.410**	-.168*	0.037	-0.019	-0.102	0.063	-.213**	-.250**	-0.142
IV4	.160*	0.116	0.052	.580**	.627**	-.593**	1	.918**	.721**	.692**	.332**	.235**	-0.09	0.071	-.338**	0.095	.314**	.347**
IV5	0.131	0.043	.397**	.603**	.668**	-.576**	.918**	1	.608**	.701**	.265**	0.137	-0.099	.165*	-0.127	0.152	.432**	.446**
IV6.1	0.043	.181*	-0.137	.591**	.520**	-.564**	.721**	.608**	1	.737**	.478**	.313**	-0.128	-0.057	-.560**	0.132	0.017	0.09
IV6.2	-0.039	0.095	.367**	.828**	.700**	-.410**	.692**	.701**	.737**	1	.572**	0.137	-.210**	0.094	-.269**	.235**	.191**	.171*
IV7	-0.003	0.104	0.081	.533**	.331**	-.168*	.332**	.265**	.478**	.572**	1	.168*	-.211**	0.009	-.316**	0.136	0.061	0.044
IV8	0.13	.218**	-.430**	.190**	.323**	0.037	.235**	0.137	.313**	0.137	.168*	1	-0.037	0.082	-.553**	-0.096	0.044	0.123
IV9	0.107	.158*	-0.135	-.150*	-0.121	-0.019	-0.09	-0.099	-0.128	-.210**	-.211**	-0.037	1	-0.097	0.037	-0.012	0.058	-0.031
CV1	.297**	-0.081	.260**	0.118	0.088	-0.102	0.071	.165*	-0.057	0.094	0.009	0.082	-0.097	1	0.12	-0.084	0.059	0.077
CV2	-0.042	-.258**	.593**	-0.121	-.178*	0.063	-.338**	-0.127	-.560**	-.269**	-.316**	-.553**	0.037	0.12	1	0.041	0.127	-0.086
CV3	-.159*	0.107	.269**	.208**	.156*	-.213**	0.095	0.152	0.132	.235**	0.136	-0.096	-0.012	-0.084	0.041	1	0.024	-0.124
CV4	.181*	.164*	.240**	.272**	.377**	-.250**	.314**	.432**	0.017	.191**	0.061	0.044	0.058	0.059	0.127	0.024	1	.289**
CV5	0.114	0.02	0.031	.206**	.272**	-0.142	.347**	.446**	0.09	.171*	0.044	0.123	-0.031	0.077	-0.086	-0.124	.289**	1

IV 1.1: Foreign Direct Investment, net inflows (% of GDP)  
IV 1.2: GDP (Current US\$)  
IV 2.1: Education Index  
IV 2.2: Population Ages 65 and Above (% of total population)  
IV 3: Relations with Neighbours  
IV 4: Country Image  
IV 5: Regime Type  
IV 6.1: Political Stability  
IV 6.2: Government Effectiveness  
IV 7: Immigrants (% of the total population)  
IV 8: Emigrants (% of the total population)  
IV 9: Colonisation Experience  
CV 1: Contagion Effect  
CV 2: Territory Size (km<sup>2</sup>)  
CV 3: Religious Diversity Index  
CV 4: Ratification of 18 International Human Rights Treaties  
CV 5: Multiparty System  
DV – Dependent Variable  
IV – Independent Variable (i.e., hypothesised variable)

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