

The international diffusion of expatriate dual citizenship

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Abstract

While the global increase of expatriate dual citizenship acceptance over the past decades has been widely observed, the temporal and spatial contexts of this trend have remained understudied. Based on a novel data set of expatriate dual citizenship policies worldwide since 1960, we find that dual citizenship toleration has increased in the last half century from one-third to three-quarter of states globally. We argue that these domestic policy changes should be understood in light of normative pressure in a world where restrictions on individual choice in citizenship status are increasingly contested and where liberalisation is reinforced through interdependence and diaspora politics. We apply Cox proportional hazard models to examine dual citizenship liberalisation and find that states are more likely to move to a tolerant policy if neighbouring states have done so and that they tend to do so in conjunction with extending voting rights to citizens residing abroad and receiving remittances from abroad. Contrary to other studies, we do not observe significant variation by regime type.

Keywords: political science, international relations, geography

1. Introduction

In line with a traditionally restrictive approach to dual citizenship, in a substantial number of states across the world, citizens automatically lose their citizenship upon the voluntary acquisition of another citizenship. Yet, the past decades have seen many states change to tolerant policies, such as Colombia (1991), Finland (2003), Australia (2002), Kenya (2010), and, most recently, Norway. By 2018, 75 per cent of states in the world accept dual

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citizenship and allow expatriates to acquire destination country citizenship while simultaneously maintaining the citizenship of the origin country.

While this trend has been widely observed and commented (Faist 2007; Sejersen 2008; United Nations 2013: 113; Mirilovic 2015; Spiro 2016), the variable acceptance of dual citizenship across states has been less well studied. Most commentators will point to factors that help us understand the broader trend, such as international mobility, gender equality, and the decreased frequency of interstate armed conflicts that traditionally played into fears about the consequences of persons having allegiances with multiple states. But, why do many previously restrictive states now accept dual citizenship, while other states continue to maintain restrictive policies?

In this article, we argue that the acceptance of expatriate dual citizenship should be understood in the context of international interdependence and diaspora governance. In a world where restrictions on choice of citizenship are seen as increasingly arbitrary and migrants commonly maintain active social, economic, and political transnational links with their origin country, political elites are increasingly pressured by expatriates to allow them to naturalise abroad while maintaining a legal link with the origin country. Both the global trend towards dual citizenship acceptance and especially changes in neighbouring countries become normatively powerful arguments to end national exceptionalism and to emulate liberalisation elsewhere. As expatriates are increasingly empowered with the extension of franchise to overseas citizens (Turcu and Urbatsch 2015) and due to the economic relevance of remittances (Leblang 2017), dual citizenship becomes part and parcel of a more general diaspora agenda. We empirically test this argument using Cox proportional hazard models and draw on an original data set capturing expatriate dual citizenship regulations in nearly all independent states since 1960.

In the remainder of this article, we first discuss the changing international context of dual citizenship. We then discuss the literature that has addressed cross-national variation and introduce our argument on interdependence and diaspora governance. In the empirical part of the article, we introduce our data set and present some descriptive statistics on the main trend over the past half century. Subsequently, we present the results of hazard models examining the variation between countries in adhering to the global trend of expatriate dual citizenship acceptance. We also present a number of specification checks in order to confirm the reliability of our main findings and further specify the observed emulation mechanisms in various models. We end with a discussion of the broader implications of these findings.

2. A changing international context

The history of how dual citizenship was long disfavoured under traditional conceptions of the individual's relationship to the state, requiring exclusive allegiance on behalf of the citizen, has been extensively covered in the literature. Dual citizenship represented a source of international tension in relation to which state can claim diplomatic protection of persons holding citizenship of two or more states, as well as with regard to the presumptively divided loyalties of dual citizens in case of conflicts between states (Spiro 1997: 1414–515). The prevention of what we term expatriate dual citizenship, that is, the phenomenon where

citizens of one state who reside abroad simultaneously hold the citizenship of another state is problematised by variety in the rules on acquisition and loss of citizenship (Bauböck et al. 2006) and weak international coordination.

The gradual development of the right to expatriation in the 19th century was a first significant step towards tackling the undesirable phenomenon of potentially conflicting allegiances. In a next phase, we see the institutionalisation of rules with regard to the loss of citizenship after a citizen voluntarily acquires the citizenship of another state. The USA, for example, codified expatriation upon naturalisation in a foreign state in 1907: ‘any American citizen shall be deemed to have expatriated himself when he has been naturalized in any foreign state in conformity with its laws’ (cited in Spiro 1997: 1435, fn 99). By 1960, similar provisions could be found in the citizenship laws of the majority of countries in the world.

Today’s rules in the majority of countries reflect a different, more tolerant approach towards expatriate dual citizenship than 50 years ago. What has changed? There are at least five distinct phenomena that work together in favour of this more tolerant global conception of dual citizenship (cf. Sejersen 2008). First, while birthright remains the main form of attributing citizenship (Shachar 2009), the idea of citizenship as a choice, rather than an innate status, becomes increasingly accepted. This ‘individual rights’ approach relates not only to acquisition, but also to loss of citizenship, as underlined when the US Supreme Court decided that Americans will be expatriated only if they specifically intend to do so; but not automatically as a result of acquiring a foreign citizenship (*Afroyim v. Rusk*, 387 U.S. 253, 1967). Secondly, discrimination between men and women with regard to citizenship acquisition has become less acceptable. Persons involved in mixed marriages increasingly will have the possibility to acquire the spouse’s citizenship through regular or facilitated naturalisation, without losing the citizenship of origin, while their children will often hold multiple citizenships automatically at birth. As a result, dual citizenship becomes increasingly prevalent, irrespective of restrictive legislation.

Thirdly, as a result of diversifying international migration (Czaika and de Haas 2014), more origin states face pressures from expatriates who wish to acquire the citizenship of these prime destination countries. Fourthly, as economic development and democratisation have led to fewer intra-state conflicts, the idea of dual allegiances provides increasingly less grounds for concerns. Fifthly, in a ‘post-national’ world where rights are increasingly defined at supra-national levels and are no longer exclusive to citizens of states, the idea that a nation-state can demand an exclusive relationship from its members becomes increasingly hollow (Soysal 1994). As a result of these five trends, dual citizenship no longer carries the ‘polygamous’ suspicion that it once was attributed (Spiro 1997: 1430, 1416). Given that these trends are both difficult to quantify and highly collinear, we do not develop individual hypotheses for each of these factors. Rather, we expect to observe their combined relevance as a period effect in our empirical analysis in the sense that states will be more likely to move to a tolerant dual citizenship policy during the more recent years of our observation period (H1). We discuss the operationalisation of a dummy variable capturing this period effect in Section 4.

3. Interdependence and diaspora governance

In a normative context where the restriction of citizenship to a formal connection with one country only seems outdated, a global trend towards expatriate dual citizenship acceptance

is unsurprising. Yet the extent to which expatriate dual citizenship is accepted is variable both in terms of the occurrence and the timing of policy changes. Remarkably, virtually all scholars aiming to explain variation in dual citizenship acceptance do so on the basis of functional models where political, economic, and demographic attributes of individual countries explain increasing dual citizenship acceptance (Itzigsohn 2000; Dahlin and Hironaka 2008; Rhodes and Harutyunyan 2010; Mirilovic 2015). Essentially, societal modernisation is seen as the driving force of dual citizenship acceptance in these perspectives (cf. Wotipka and Ramirez 2008: 315–16). Such studies overlook one crucial element, namely that the changing normative context underlying the global *trend* implies that policy decisions in one country are not independent in space and time but are conditioned by those made in other countries at other points in time.

The phenomenon where ‘government policy decisions in a given country are systematically conditioned by prior policy choices made in other countries’ (Simmons et al. 2006: 787) is traditionally labelled as international diffusion. Such diffusion processes have been observed in domains, such as social and economic governance (Gilardi 2010: 660), democratisation (Gleditsch and Ward 2006), and, here most relevant, diaspora enfranchisement (Lafleur 2015; Turcu and Urbatsch 2015), diaspora institutions (Gamlen 2014), as well as in some qualitative studies on changing dual citizenship policies (Escobar 2007: 51–5; Sejersen 2008: 536; Whitaker 2011: 759). Leblang (2017: 90–93), in an analysis where the primary focus is on the independent effect of dual citizenship on remittances, has provided a first empirical indication of diffusion in expatriate dual citizenship acceptance. In this article, we build on this literature and provide both a theoretical account of the diffusion of expatriate dual citizenship and, subsequently, a systematic empirical test.

3.1 Emulation of global and regional norms

Our account of expatriate dual citizenship acceptance focuses on what, on the related topic of diaspora enfranchisement, Turcu and Urbatsch (2015: 414) have termed ‘direct emulation’ and Lafleur (2015: 846) ‘norm internationalization’. Emulation ‘means that some policies gain legitimacy and are socially constructed as appropriate solutions to given problems’ (Gilardi 2010: 661). In light of an increasingly favourable global template, policymakers respond to calls by the diaspora emphasising how expatriates can contribute, economically and politically, to the development of their home country if they are allowed to retain (or regain) their citizenship of origin while naturalising abroad (Haitian Congress PAC 2009). Yet, sentiments against dual citizenship are easily mobilised, among those populations of home countries who are ‘left behind’. As a result, dual citizenship becomes a contested phenomenon and a battleground for the political acceptance of migration more generally (Vink et al 2019).

International migrants play a key role in such processes by acting as ‘agents of diffusion’ (Pérez-Armendáriz and Crow 2010) as they are ‘well-positioned to learn from other countries’ policies’ (Turcu and Urbatsch 2015: 413). For example, in Sweden, the expatriate community ‘played an important role in the acceptance of dual citizenship, and had a big influence on the debate preceding the acceptance’ (Bernitz 2012: 11; cf. Spang 2007). In Mexico, organisations of Mexicans abroad have been ‘very vocal in their demands for official recognition’ (Hoyo 2015: 9) and ‘[p]roponents of dual nationality invoked its

acceptance by more than 50 countries' (Fitzgerald 2005: 184). In these and similar reform campaigns over the past decades, the changing global approach presents a forceful normative argument for liberal proponents in the sense that a continuing restrictive policy is framed as an 'outdated' approach and countries refusing to accept the 'new reality' are pictured as 'lagging behind' the global trend. In line with the expectations of world society theory (Meyer et al. 1997), as more states tolerate expatriate dual citizenship, this trend puts pressure on political elites and electorates and accepting dual citizenship increasingly becomes part of a 'shared policy repertoire [as] something that is expected by emigrants and states alike' (Levitt and de la Dehesa 2003: 599).

Policy changes in neighbouring countries in particular can be expected to be especially influential as countries sharing cultural, economic, and political affinities serve as a more appropriate reference category in home country political discourse, compared to those countries that are geographically distant (Elkins and Simmons 2005; Turcu and Urbatsch 2015: 413). In other words, the 'triumph of a set of ideas' (Wotipka and Ramirez 2008: 312) spreads through isomorphism of geographically contiguous countries. Escobar observes this process of emulation within the context of Latin America, where changes in many countries followed up on each other within the span of a decade or so: 'We need to take into account that regional diffusion (. . .) was a contributing factor because the countries that established dual citizenship early served as examples and, in some instances, as providers of direct advice to the other countries' (Escobar 2007: 51–2). In Scandinavia, the early lead of Sweden (accepting dual citizenship in 2001) and an expected change in Norway (which did not materialise at the time, as dual citizenship was only accepted by the end of 2018) explicitly encouraged Finland in the direction of a similar reform in 2003 (Fagerlund and Brander 2013: 12). Whitaker (2011: 779) indicates that also in Africa, though understudied, diffusion effects are likely increasingly relevant as more African countries recognise dual citizenship (cf. Manby 2016: 73–9).

Of course, states can both liberalise *and* restrict dual citizenship, and all policy changes need not be unidirectional. There are certainly some examples of 'back-sliding' states with previously tolerant policies that at some point during our observation period change to a restrictive policy, such as most recently the restrictive turn in Slovakia in 2011 in response to expansive changes to the citizenship law in neighbouring Hungary (Bauböck 2010a). Yet in line with Lee and Strang (2006: 907), who argue that what kind of policy changes are politically 'contagious' depends on what is the norm in different historical periods, we assume that back-sliding to restrictive approach to dual citizenship are not equally influential across borders as changes to a tolerant approach, especially not when dual citizenship becomes globally acceptable in the recent period.

We thus expect to observe a temporal sequence where recent nearby changes towards a toleration of expatriate dual citizenship increase the propensity to tolerate expatriate dual citizenship in states that hitherto held a restrictive approach to dual citizenship (H2).

3.2 The political and economic context of diffusion

Policy emulation does not take place in a political vacuum. There are two reasons why we should consider additional factors. First, besides diffusion, it is likely that other factors related to diaspora politics, independently or in conjunction with norm emulation, push

for dual citizenship liberalisation. After all, we find that some countries move earlier than others towards a tolerant regime, even within geographic regions. For example, nearly all South American countries have moved towards a tolerant dual citizenship regime since the early 1990s. Yet, there is a significant gap between the introduction of expatriate dual citizenship in frontrunners Colombia (1991), Peru (1993), Brazil (1994), and, on the other hand, in latecomers such as Bolivia (2004) and Chile (2005) (Escobar 2007: 54; Acosta 2016: 13–14). We argue that an analysis of the diffusion of expatriate dual citizenship acceptance should consider three factors as having an impact on diaspora rights acceptance: external franchise, regime type, and received remittances. These factors build on the existing literature, yet have so far not been systematically investigated within a longitudinal perspective that takes interdependence into account. Secondly, these factors allow us to investigate the extent to which the political and/or economic context is systematically related to diffusion, for example, by conditioning the extent to which countries are prone to follow the lead of frontrunners in the geographic neighbourhood. In other words, taking into account these explanatory factors will help us better understand the underlying mechanism of norm emulation.

We first consider *electoral rights*, in particular the question whether citizens of a country who reside abroad have the right to participate in national legislative elections. Our reasoning here is straightforward. Dual citizenship reform arises often as a consequence of political demands by expatriate communities, as in the Swedish (Bernitz 2012: 11; Spang 2007) and Mexican cases (Escobar 2004, 2007; Fitzgerald 2005). Yet the political empowerment of expatriate communities depends especially on whether they are enfranchised, and thus can exercise electoral influence from abroad. Whereas traditionally in most polities voting has been restricted to resident citizens only, there is a clear trend towards extending suffrage to citizens residing abroad (Turcu and Urbatsch 2015). Hence, our expectation is that states where expatriate citizens have been recently enfranchised are more likely to move towards a tolerant dual citizenship regime (H3a).

In addition to diaspora enfranchisement having a direct relation with dual citizenship change, one could argue that politically empowered expats act as norm entrepreneurs and thus condition the impact of policy diffusion. If diaspora communities push for liberalisation in the wake of changes affecting other diaspora groups, especially those from geographically related origin groups, the recent extension of voting from abroad should strengthen the impact of diffusion. In other words, we expect that recent changes in neighbouring states towards toleration of expatriate dual citizenship increase the propensity to tolerate expatriate dual citizenship especially in countries that recently have extended external voting rights (H3b).

We also consider the *political regime type* of a country. In authoritarian systems, citizens residing abroad may do so out of dissatisfaction with the current region, or may even be forced to flee and reside abroad as political refugee. Hence, those in power in authoritarian regimes are likely to be insensitive to political demands from the diaspora to extend dual citizenship or even politically motivated to ‘resist’ (Mirilovic 2015: 7) demands that may strengthen political opposition to the regime. By contrast, Turcu and Urbatsch (2015: 414) argue that formalistic ways of diaspora incorporation, in their case through external voting or in our case through dual citizenship extension, may also be employed as a form of ‘competitive signalling’ that helps a state ‘look more democratic, inclusive’.

From the perspective of democratic systems, as parties are eager to extend their electoral basis, they are likely not only to support diaspora requests for external franchise (Lafleur 2015: 846) but also for dual citizenship, as being allowed to preserve one's status as citizen of a sending state is a precondition for voting from abroad. Whitaker (2011: 777–8) concludes that in the African context the political environment is a key underlying condition for expatriate dual citizenship acceptance, as she demonstrates on the basis of case studies of Ghana, Kenya, Senegal, and Nigeria (even if it does not play out as expected in the latter case, where dual citizenship was recognized during a period of military rule). Rhodes and Harutyunyan (2010) put forward the 'contestation hypothesis' that higher levels of regime competition make states more likely to extend citizenship to emigrants (Lafleur (2015) terms this the 'electoral competition hypothesis'). Their reasoning is that the norm of universality inherent to democracy implies that 'transitions to competitive regimes generally have been, almost by definition, accompanied the extension of citizenship rights to more groups' (471). Following these lines of reasoning, we hypothesise that democracies in general are more likely to accept dual citizenship (H4). A failure to accept this hypothesis (i.e. if democracies are not more likely to accept dual citizenship) might be related to the theoretical expectation that dual citizenship reforms are a form of competitive signalling.

Thirdly, besides their political influence through external franchise, we look at the *economic power of emigrants*. Even if emigration is viewed reluctantly from a home country perspective (resulting in the institution or continuation of restrictive policies), many sending states eventually recognise the economic value in maintaining the link with the expatriate community (Gamlen 2014). Diasporic communities often emphasise their economic relevance for domestic economies and from this derive a claim for retaining a formal link with the origin country. It has been widely argued that recognising their economic relevance has been instrumental in reconceptualising the role of the diaspora. For example, while a migrant sending state as Mexico originally sought to exercise control over the diaspora by penalising the acquisition of foreign citizenship with the loss of the citizenship of origin, now it is recognised that 'mexicanidad' can be maintained while acquiring, for example, US citizenship (Fitzgerald 2009: 33). Research by Leblang (2017) demonstrates that expatriates from countries extending dual citizenship are more likely to remit than expatriates from countries that do not provide such right. We assume that this dynamic also works the other way around, as political elites of countries with high remittances will aim to avoid being penalised economically for restrictive dual citizenship policies. We thus expect that higher levels of received remittances will be positively associated with the likelihood that a country moves towards accepting dual citizenship (H5).

4. Data and methodology

The data used for our analyses derive from several sources. We present first a data set from which we derive our dependent variable. We then present descriptive statistics on the main trend in dual citizenship acceptance. Subsequently, we discuss the operationalisation of explanatory and control variables and our method of analysis.

4.1 Dependent variable

The dependent variable is taken from an annually updated and publicly available data set produced by three of the authors of this paper, covering information on expatriate dual citizenship in nearly all independent states of the world since 1960 (Vink et al. 2015). The start year of 1960 was selected in order to allow for a longitudinal analysis during the post-war period, starting before the major waves of decolonisation and democratisation. In this article, we use data up to and including 2017, the latest year for which data is comprehensively available on the covariates included in our main models.

While existing data sets include significant conceptual ambiguities (cf. Mirilovic 2015: 9), our data set covers one specific manner in which citizenship can be lost, namely as a result of voluntarily acquiring another citizenship. In our coding scheme, we distinguish three main types of national rules, as well as some variations of these three types of rules, detailed in a codebook that is made available along with the data set. These rules regulate the legal response in a country to the voluntary acquisition by a citizen of that country of the citizenship of another country. In the binary coded variable (*dualcit_binary*) we use as dependent variable in the analyses of this article, the rule of automatic loss of citizenship in response to the voluntary acquisition of another citizenship takes the value 0. Most countries accepting expatriate dual citizenship allow their citizens naturalising elsewhere to voluntarily renouncing their citizenship of origin. In a minority of states, such as Morocco or Qatar, voluntary renunciation of citizenship is not possible either and citizens who acquire another citizenship will always have dual or multiple citizenship. Both types of rules are essentially tolerant towards dual citizenship and we code these as 1 on our binary dual citizenship variable.

The countries in our data set can hence be categorized into three groups based on this dependent variable: (1) countries with already tolerant expatriate dual citizenship policies in 1960; (2) countries that were restrictive in 1960 but have changed towards a tolerant policy by 2017; and (3) countries that have remained restrictive since 1960. Note that for countries that became independent after 1960 we observe their dual citizenship policy since the year of independence. Supplementary Table A1 lists these three groups, including the year of change for countries in the middle group.¹

Figure 1 shows a strong trend towards acceptance of expatriate dual citizenship in the past half century. While less than 40 per cent of all countries that existed in 1960 accepted dual citizenship, this percentage increases steadily to over 70 per cent of countries in 2017. This trend took place in all regions around the world, though more forcefully in some than in others. On the American continent, in 1960 both the USA and Canada did not accept expatriate dual citizenship and more than half of the countries in Central and South America applied a rule of automatic loss upon the voluntary acquisition of another citizenship.

By 2017, however, dual citizenship is fully accepted in North America and in almost all countries in Central and South America. Nearly the same pattern can be seen in Oceania. In Europe, the change from restrictive attitudes towards dual citizenship to dual citizenship tolerance follows the global trend, with 47 per cent of states having tolerant policies in 1960 to over 70 per cent in 2017. The percentages of countries accepting dual citizenship in 2017 are lower in Africa and Asia, though even there a comfortable majority of states allows its citizens naturalised elsewhere to retain their citizenship of origin.²

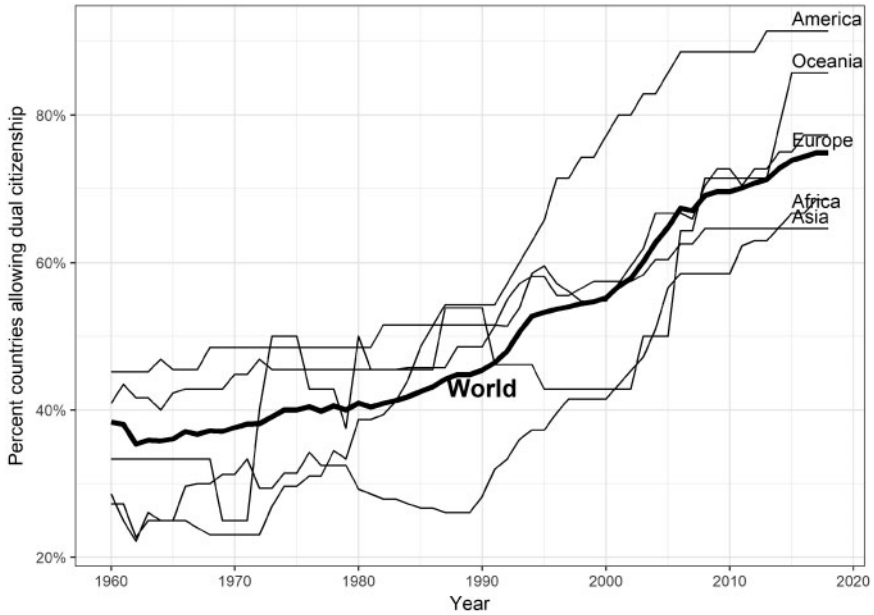


Figure 1. Percentage of countries accepting expatriate dual citizenship, 1960–2017, globally and by world region.

Figure 2 further explores this trend by outlining the policy changes since 1960. Whereas 23 per cent of countries never allowed dual citizenship and 44 per cent always allowed dual citizenship, altogether in 32 per cent of the countries a change in the policy occurred since 1960. We count 75 changes on our binary dependent variable. An overwhelming 64 changes (85 per cent) presented a liberalisation of citizenship policies. Providing first descriptive evidence for our ‘period effect’ hypothesis (H1), most changes took place in the 1990s and 2000s, especially in Latin America (one-third of all changes), followed by Africa and Europe (one-quarter of all changes each). In addition to changing policies, we observe that among the 103 countries that became independent after 1960, they are more likely to adopt a dual tolerant citizenship to start with when it became fashionable globally. While old countries have institutional histories to defend, new countries are especially exposed to a changing global template. Among the 68 countries that became independent during the first half of the observation period, the number of countries starting with restrictive and tolerant policies is not very different, respectively, 36 (53 per cent) and 32 (47 per cent). Among the 35 countries becoming independent after 1988, however, only six (17 per cent) start with a restrictive policy whereas 29 (83 per cent) start with a tolerant policy.

In order to systematically test H1 as well as control for a period effect (i.e. the increasing likelihood of states having liberal dual citizenship policies around the world in), we add a dummy variable to all models that splits the total observation period 1960–2017 in two periods of 29 years: in two periods: 1960–87 and 1988–2017. While this is admittedly a crude periodisation, based on our descriptive statistics (Figs 1 and 2) the main trend

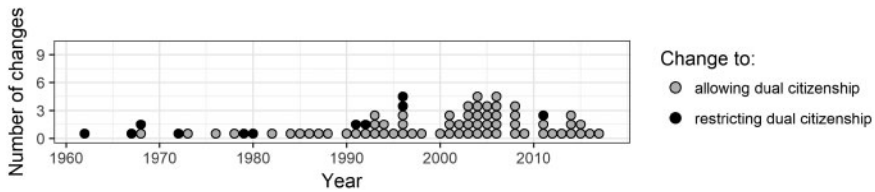


Figure 2. Changes in acceptance of expatriate dual citizenship, 1960–2017.

towards dual citizenship acceptance begins in the late 1980s and thus best captures the changed international environment as discussed in Section 2.³

To test our expectations around regional diffusion, we measure dual citizenship acceptance in nearby countries, defined as those with a minimum distance between the borders of 500km or less (cf. Gleditsch and Ward 2006: 922), or as one of three closest countries (in order to capture diffusion between island nations located more than 500 km away from the nearest neighbouring country). We expect that nearby dual citizenship acceptance does not have an immediate, but rather a delayed effect on the propensity to tolerate expatriate dual citizenship in states that hitherto held a restrictive approach to dual citizenship. Hence, we measure nearby dual citizenship acceptance in the past three years.⁴ We include a series of alternative operationalisations for this variable and present robustness analyses in Section 6 to check whether and how these measures matter for the outcome of our analyses.

Data measuring the extension of voting rights to expatriates are taken from the ‘Voting from Abroad Database’ provided by the International Institute for Democracy and Electoral Assistance (IDEA 2016). Data on political regime type were taken from the V-Dem data set (Coppedge et al. 2018) using the ‘v2x_regime’ variable recoded as a dummy for electoral democracy. Among existing longitudinal data sets on regime type, V-Dem has a better geographical coverage than the Polity IV data set, the main alternative measurement of regime type (Marshall et al. 2016).⁵ Moreover, V-Dem should be expected to do a better job in discriminating ‘real’ from ‘fake’ democracies, primarily where de facto practices deviate from de jure standards (Lührmann et al. 2018: 71). To measure the economic significance of emigration for domestic economies of origin countries, we use data on received remittances from the World Development Indicators produced by the World Bank (Arel-Bundock 2018). Since data availability for this variable is considerably more limited in geographical and temporal scope than our other variables, we present analyses including remittances in separate models. Data on total population size of a country and gross domestic product (GDP) per capita (in current US\$) are also from the World Bank. We use natural logarithms to account for the exponential distribution of these variables. Supplementary Table A2 provides descriptive statistics.

4.3 Method

Given the longitudinal structure of our data set, we apply a Cox proportional hazards model in order to analyse the time that passes before countries accept expatriate dual citizenship. We thus conceive moving from restrictive to liberal expatriate dual citizenship

policy in terms of survival analysis as a ‘failure’ and estimate the survival rates of restrictive policies. To do so we structure our data set by including only countries that do not accept dual citizenship in 1960 *or* that become independent after 1960 and do not accept dual citizenship at the moment of independence. We also include back-sliding countries in our main analyses from the time they had restrictive policy, that is, those countries that at some point after 1960 have moved from a tolerant to a restrictive dual citizenship policy. These countries were again ‘at risk’ of moving back to a tolerant policy.⁶ This data set includes 102 countries and 55 ‘failures’, that is, changes to expatriate dual citizenship acceptance, and a maximum of 4,002 country-year observations.⁷

Some remarks on the data structure in light of the hazards models. First, ‘duration’ in our analysis measures the number of years of having restrictive dual citizenship policies, either since 1960 or since the moment of independence of a country. The maximum duration is 58 years. While, at the starting point of our observations, 1960, almost all countries in existence in that year already existed longer, we assume that before this period the ‘risk’ for traditionally restrictive countries to change to tolerant expatriate dual citizenship policies was limited. Hence, the duration of these restrictive policies before 1960 is, in our view, largely irrelevant and mostly associated with length of existence of a country. Yet we include a control to check whether it matters whether a state already existed before 1960 or only becomes independent afterwards. Secondly, the data set is right-censored since some countries exit the data set without a ‘failure’ having occurred if they cease to be independent before 2017 or where no ‘failure’ occurred before the end of the empirical observation period. Cox proportional hazard models predict the probability that a country will adopt a dual citizenship policy, assuming that even if the ‘event’ of changing to dual citizenship acceptance has not yet occurred by the end of our empirical observations, there is a real risk that this will happen in the future.

5. Findings

Table 1 presents the results of the Cox proportional hazards models for the likelihood of countries that previously had a restrictive policy towards expatriate dual citizenship moving to a tolerant dual citizenship policy. We present here five models, starting with our main model (Model 1) and a model that includes an interaction between diffusion and voting from abroad (Model 2). Models 3 and 4 are run on fewer observations due to data limitations for the variable ‘received remittances’. To check whether data availability affects the main results, Model 3 is first run on this selection without remittances; subsequently, Model 4 adds the remittances variable (and controls for population and GDP per capita).

The results of Model 1 show, first, that the recent adoption of dual citizenship by a neighbouring country increases the probability to accept expatriate dual citizenship. This confirms our main diffusion hypothesis (H2). Secondly, we find that the recent extension of external franchise is positively and significantly related to the odds of extending dual citizenship to expatriates. This suggests that dual citizenship extension is driven by, or at least associated with, a diaspora engagement agenda where the influence of politically active expatriates may be strengthened by their enfranchisement (H3a). One should be careful in interpreting these findings in causal terms, however, as, first, a diaspora may be

Table 1. Likelihood of expatriate dual citizenship acceptance: hazard ratios (standard errors)

	(1)	(2)	(3)	(4)
Recent nearby dual citizenship acceptance	2.71** (0.88)	2.98** (1.02)	2.99** (1.00)	2.98** (1.02)
Recent voting from abroad extension	3.48** (1.45)	4.18** (1.91)	3.91** (1.68)	3.85** (1.67)
Recent nearby dual citizenship acceptance # Recent voting from abroad extension		0.41 (0.48)		
Log remittances received				1.25* (0.11)
Electoral democracy	1.22 (0.35)	1.22 (0.35)	0.97 (0.30)	0.77 (0.29)
Recent period	3.09* (1.63)	3.10* (1.63)	2.32* (1.33)	1.92 (1.10)
Independence post-1960	0.96 (0.31)	0.97 (0.31)	0.82 (0.28)	0.69 (0.28)
Log-likelihood	-217	-217	-175	-170
N (observations)	4,002	4,002	2,273	2,273
N (countries)	102	102	94	94
N (events)	55	55	49	49
Including back-sliding countries	Yes	Yes	Yes	Yes

Note: Model 4 controls for population size and GDP per capita (results not shown).

* $p < 0.05$; ** $p < 0.01$ (two-tailed).

enfranchised, but not politically active and, secondly, formal acceptance of external voting need not imply that such rights can also be exercised in practice. A study of Latin America and the Caribbean found that many variations of electoral rights, types, and venues of representation of emigrants are observable (Palop-García and Pedroza 2017). For example, in Mexico, it took a decade for external voting, formally adopted by Congress in 1996, to take effect (Cano and Delano 2007: 713). When adding the interaction between the presence of external voting and diffusion (Model 2), we find that emulation of recent changes to dual citizenship acceptance in neighbouring countries is not significantly conditioned by the recent enfranchisement of the diaspora (H3b). Hence, while our findings show the need to consider both dual citizenship acceptance and external voting as elements of an integrated diaspora inclusion agenda, we find no evidence that external franchise conditions diffusion (see also a specification check of the temporal sequence in Section 6).

Thirdly, and contrary to what we hypothesized following Rhodes and Harutyunyan (2010) and Whitaker (2011), we cannot confirm that democracies are more likely to move to a tolerant dual citizenship policy. Even though the coefficient is positive, the large confidence intervals indicate that the effect of democracy cannot be determined

with certainty. The latter finding chimes with evidence on the relationship between democratisation and diaspora engagement, which is mixed at best (Rhodes and Harutyunyan 2010; Lafleur 2015: 848). Turcu and Urbatsch (2015: 425), on external franchise extension, suggest that autocratic states may ‘exploit this norm to feign being good democratic citizens’ but will find ways to avoid risking regime-threatening electoral participation by an enfranchised diaspora (p. 428). Similar dynamics can perhaps be found on dual citizenship extension. This finding suggests that change in line with a broader global trend, and reinforced by change in the geographic neighbourhood, may well have a stronger signalling function than express a true commitment to effectively incorporate an active diaspora within the domestic political arena of the home country.

We graphically illustrate the substantive importance of the changing dual citizenship policies of neighbouring countries and franchise extension abroad in Fig. 3. The two graphs plot the survivor function for, respectively, those countries with and those without neighbours recently accepting expatriate dual citizenship (left graph) and those that did and did not recently extend voting rights to expatriates (right graph). The graphs illustrate two observations. First, during the early observation years (corresponding with the time period until the mid-1980s for those states independent in 1960), the likelihood for previously restrictive policies to survive was high for all countries; until then, the relevance of both nearby dual citizenship policies and external franchise introduction are limited. This

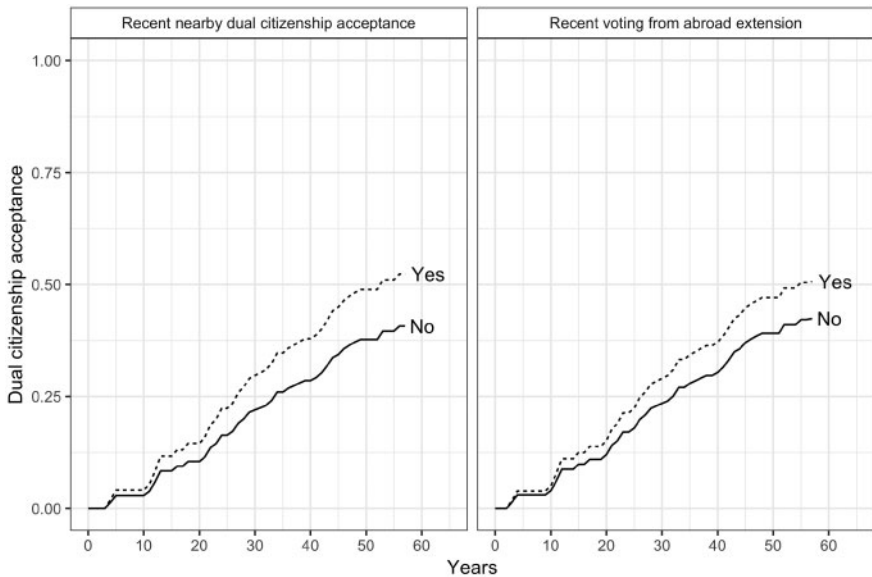


Figure 3. Probability that a country accepts dual citizenship with nearby recent dual citizenship change, respectively, recently extended voting from abroad, set as 0 (“No”) or 1 SD above the mean (“Yes”). Estimates are based on Table 1, Model 1.

corresponds to what we have observed earlier on the basis of the descriptive analysis, which showed that the main trend of dual citizenship liberalisation kicks in towards the end of the 1980s.

Secondly, during the second half of the analysis time period, the differences between the groups of countries become more substantive. Note that we control for a period effect in this model, hence these estimates of the relevance of diffusion and diaspora franchise are additive to the overall increasing likelihood of dual citizenship acceptance (as represented by the fact that also the bottom lines increase substantially). This chimes with the argument by Lee and Strang (2006) that neighbourhood diffusion is affected by the wider climate. In this period, when accepting expatriate dual citizenship generally becomes likelier, countries whose neighbours have recently moved to dual citizenship are around 50 per cent more likely to introduce dual citizenship compared to countries without such neighbours. The same, however, applies to those countries that have recently introduced voting from abroad, compared to those who have not. The simultaneity and broadly similar magnitude of the associations between these two variables and dual citizenship change suggest that they are likely to be understood as two sides of the same coin of a diaspora governance agenda that both spreads between countries and is reflected in both franchise extension and dual citizenship acceptance.

These findings thus allow us to broaden the argument from previous research on the diffusion of the external franchise (Turcu and Urbatsch 2015), by suggesting both that similar diffusion processes can be identified with regard to dual citizenship acceptance as well as that franchise extension, dual citizenship acceptance, and nearby change are inextricably linked. Moreover, while in-depth qualitative studies are required to trace the political processes behind dual citizenship reforms, these findings allow us to identify possible typical cases of diffusion, such as, more recently, in Chile (2006; nearby change in Bolivia in 2005), Djibouti (2005; nearby change in Somalia in 2004), Honduras (2003; nearby change in Nicaragua in 2001), and Luxembourg (2009; nearby change in Belgium in 2008).

Subsequently, Models 3 and 4 present the results of separate analyses where we look at the association between received remittances and expatriate dual citizenship acceptance. We present this evidence in separate models due to the limited availability of data on received remittances. We first re-run Model 1 based on this sub-sample with lower number of observations (Model 3) and find that the relevance of diffusion and external franchise is robust across these different sample sizes. Subsequently, we add the variable measuring remittances and find that, as hypothesized, higher remittances increase the likelihood for a country to move to tolerant dual citizenship regime (Model 4).⁸ This suggests that it is not just a political enfranchised, but also an economically powerful diaspora that pushes for dual citizenship liberalisation. Our diffusion indicator remains significant throughout these analyses.

6. Specification and robustness checks

In this section, we discuss the results of a number of specification and robustness checks with alternative operationalisations of our diffusion variable and external franchise

Table 2. Likelihood of expatriate dual citizenship acceptance: hazard ratios (standard errors)—alternative model specifications

	(5)	(6)	(7)	(8)	(9)	(10)
Recent nearby dual citizenship acceptance	2.62** (0.88)				2.59** (0.87)	3.12** (1.04)
Recent regional dual citizenship acceptance		2.19* (0.70)				
Nearby dual citizenship policy			3.21* (1.69)			
Recent non-neighbour dual citizenship acceptance				2.42 (1.58)		
Recent voting from abroad extension	3.49** (1.46)	3.60** (1.50)	3.47** (1.45)	3.33** (1.39)		2.99* (1.34)
Proximate voting from abroad extension					0.24 (0.24)	
Electoral democracy	1.26 (0.37)	1.28 (0.37)	1.28 (0.36)	1.30 (0.37)	1.26 (0.36)	1.28 (0.39)
Recent period	3.23* (1.71)	2.70 (1.46)	3.40* (1.79)	2.63 (1.45)	3.47* (1.83)	2.01 (1.22)
Independence post-1960	0.95 (0.31)	0.89 (0.29)	0.92 (0.30)	0.92 (0.30)	0.99 (0.32)	1.20 (0.40)
Log-likelihood	-209	-210	-210	-212	-211	-191
<i>N</i> (observations)	3,848	3,848	3,848	3,848	3,848	3,749
<i>N</i> (countries)	102	102	102	102	102	91
<i>N</i> (events)	53	53	53	53	53	49
Including back-sliding countries	Yes	Yes	Yes	Yes	Yes	No

* $p < 0.05$; ** $p < 0.01$ (two-tailed).

variable. These findings are presented in Table 2 (see additional models in Supplementary Table A3).

In order to compare between models, we first re-run our main model on what is a slightly lower number of observations (due to different lagged variables) and confirm the stability of our findings (Model 5). Then we look at two alternative operationalisations of our diffusion variable and do one robustness check. First, we check whether it makes a difference whether we measure recent change in the same world region rather than in a neighbouring country (Model 6). We find that diffusion remains positive and significant when measured at the regional level (but becomes insignificant when looking at regional changes

in the past five years, Model 12, Supplementary Table A3). Secondly, we measure the mean dual citizenship policy among neighbouring countries instead of change per se (Model 7). This helps us determine whether it is the mere existence of tolerant dual citizenship policies in the geographical neighbourhood that explains policy change in a country (i.e., through increasing normative pressure) or rather whether emulation is a more dynamic process where policymakers react to the *changing* policies of other countries. We find that this alternative operationalisation also significantly predicts the likelihood of change to a tolerant regime. This finding suggests that emulation proceeds through the existence of liberal policies per se and not exclusively through the normative impact of nearby dual citizenship *reform*. Thirdly, we test the robustness of nearby or regional diffusion and run the Cox model including a variable that measures whether any non-neighbouring country has accepted dual citizenship in the past three years (Model 8). This variable hence measures the global acceptance of dual citizenship apart from neighbouring countries and from a diffusion perspective, we would expect such changes to exert less or no normative influence, beyond what we already pick up by variable controlling for the period effect. We observe a positive but not significant correlation.

Subsequently, we look at an alternative operationalisation of the external franchise variable in order to identify whether it is actually dual citizenship reform that follows electoral reform, or vice versa dual citizenship extension that generates calls for extending voting rights abroad. We aim to tease this out by using a variable measuring whether voting from abroad will be introduced at any point within the next five years (Model 9). If dual citizenship follows franchise extension, but not the other way around, this could be seen as evidence for the argument that enfranchisement politically empowers expats who subsequently are likely to be more influential in lobbying for dual citizenship change. We find that the likelihood of dual citizenship acceptance in a given year is not significantly related to electoral reform within the near future. While this finding does not exclude the possibility that a government predisposed to an integrated diaspora agenda implements both franchise extension and citizenship liberalisation, rather than a franchised diaspora campaigning for dual citizenship extension, this does suggest a more common sequence within the politics of diaspora engagement where first voting rights are extended abroad and subsequently are followed by dual citizenship reform.

Finally, when excluding 11 back-sliding countries from the analysis (Model 10) we find that this neither affects the significance of diffusion nor of extending franchise abroad.

7. Conclusion

Expatriate dual citizenship toleration increases over time and clusters spatially. Nowadays, three-quarter of countries accept dual citizenship for expatriates acquiring another citizenship up from less than one-third in 1960; this trend is most pronounced in the Americas, Oceania, and Europe and, though still noticeable, less strong in Africa and Asia. Analysing this trend, we find that dual citizenship liberalization reflects an agenda of modern diaspora governance where expatriates are increasingly viewed as part of a community that continues to contribute to political and economic development of sending

states. From this perspective, accepting citizens residing abroad to acquire another citizenship while continuing to hold on to their original citizenship is plausibly associated with simultaneous trends as extending external franchise and receiving financial remittances.

Increasing expatriate dual citizenship toleration is a largely self-sustaining phenomenon in a world where not only global migration shows no sign of retreating (Ratha et al. 2016), but the increasing number of states now accepting expatriate dual citizenship put ever more normative pressure on those that lag behind. Moreover, reverting back to restrictive dual citizenship policies from a by now frequently enfranchised and often economically powerful diaspora, is politically challenging, as ‘serious disincentives exist to reverse course’ by taking from emigrants what they meanwhile have become to see as an entitlement (Faist et al. 2006: 916). In contrast to what is sometimes argued (Rhodes and Harutyunyan 2010; Whitaker 2011; Mirilovic 2015), we cannot confirm that democracies are more likely to move to accepting dual citizenship. In our view, this is support for a view that emphasises the signalling impact of policy reform, where liberalisation in one country triggers nearby change in countries that do not want to lag behind.

These findings address the critique of methodological nationalism in citizenship studies by taking seriously the transnational constellations where citizenship policies have effects outside national borders and politically active diasporas mobilise across borders (Bauböck 2010b; Collyer 2014). In other words, interdependence matters, even in the nationally sensitive domain of citizenship. While this article provides an example of how such a transnational diffusion agenda can be applied in a systematic manner to the study of citizenship politics, some caveats are in order.

First, our quantitative research strategy is aimed at ‘pattern finding’ (Lee and Strang 2006: 886), but does not provide an exhaustive analysis of possible diffusion mechanisms. In line with our theoretical expectations we do find both a geographical ordering of dual citizenship policies, where changes in one country match those in geographically near countries, as well as a temporal ordering of this covariance, in terms of changes in one country following those in another country within a certain temporal limit. Yet, our ‘big picture’ approach, covering a long time period and nearly all existing states in the world, can only go so far in terms of insights in the micro-political foundations of diffusion mechanisms. We thus encourage further qualitative research on the drivers behind dual citizenship acceptance in line with some early case studies in the field (Escobar 2007; Sejersen 2008; Whitaker 2011). Here the role of international government and non-government organisations would be worth investigating as potential agents driving emulation or learning (cf. Checkel 1999).

Secondly, we need also to look beyond the surface of converging formal measures of diaspora engagement and look at the implementation of dual citizenship rights in practice. As with external voting, where ‘many variations in terms of specific electoral rights, types and venues of representation of emigrants are observable’ (Palop-Garcia and Pedroza 2017: 1597; Lafleur 2015), we do not exclude that access to expatriate dual citizenship is also hampered by implementations that may restrict effectively holding on to one’s citizenship of origin.

Thirdly, expatriate dual citizenship acceptance is but one of the elements of citizenship policies that have strong external effects (Vink and Bauböck 2013). Of these, the varying conditions under which emigrants across the world can transmit citizenship to their

children is the most notable, yet understudied phenomenon; regulations on the loss of citizenship due to continued residence abroad provide another example where keeping a formal link with the home country alive depends on varying national institutional contexts. Analysing the relation between expatriate dual citizenship and external voting, on the one hand, and formal diaspora institutions such as administrative departments within the executive branch of government would also be a worthwhile avenue for research on the practice of external citizenship (cf. Gamlen 2014). By demonstrating one way in which our data can be analysed based on insights from contemporary discussions in migration studies, we hope to have provided further inspiration for such studies.

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Disclaimer

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Supplementary data

Supplementary data is available at *Migration Studies* online.

Notes

1. The codebook accompanying the data set provides full details on relevant legal provisions.
2. Supplementary Figure A1, displaying the trend based only on those 90 countries that continuously existed from 1960 to 2017, shows that the trend of dual acceptance is not just a reflection of the changing number of states.
3. We also ran additional models where we replaced this period dummy by a variable that captures the percentage of states throughout the world that accepts dual citizenship in a given year. This produces results broadly similar in direction and significance for the main variables in the models.
4. We measure this as a change in the current year or the two preceding years. Neighbouring countries were identified with data provided by the R package 'cshapes', which provides a function to calculate distances between countries (Weidmann and Gleditsch 2010).

5. We do not include additional data on number of emigrants because of the limited nature of available data on migration stock and flow data. The most comprehensive available data covers bilateral migrant flows from 178 origin countries but only into 18 destinations and only over the period 1980–2006 (Fitzgerald et al. 2014).
6. Model 10 provides a robustness check for the impact of excluding these back-sliding countries from the analyses.
7. These numbers refer to Models 1 and 2. Due to missing data for some variables and the use of lagged variables, the additional models are run on fewer observations.
8. As this is a logged variable, a tenfold increase of remittances increases the probability to accept expatriate dual citizenship to 25 per cent (Model 4).

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