WORKING PAPER

Going Global: Opportunities and Challenges for the Development of a Comparative Research Agenda on Citizenship Policies at the Global Level

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Robert Schuman Centre for Advanced Studies

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Abstract

Thanks to the work undertaken by different research teams (GLOBALCIT, MACIMIDE, MIPEX…), data on citizenship policies are becoming available on a wide range of countries worldwide. The collection of these data makes it possible to develop new comparative research frameworks that go beyond the dominant European/Western-centred perspective that we find in traditional citizenship studies. The development of cross-regional comparative frameworks allows testing the generalisability of explanations for policy-variations more comprehensively and contributes to formulating new hypotheses and theories to account for both convergences and divergences across time and space. However, the need to adapt concepts and measurement tools to the different realities of citizenship at the global level raises important challenges. Drawing on the workshop 'Going Global: Opportunities and Challenges for the Development of a Comparative Research Agenda on Naturalisation Policies at the Global Level' that was convened in 2021 at the Robert Schuman Centre, under the framework of the Global Citizenship Governance programme, contributors to this working paper have been invited to reflect on the promises and difficulties that the articulation of a global comparative perspective in citizenship studies involves. Two main recommendations for the advancement of a comparative agenda at the global level stand out from this symposium: the first is to accommodate as much as possible the specificities of each context within the construction of comparative frameworks; the second is to acknowledge the biases and limitations of the perspective that we take as researchers. It therefore emerges that in order to make a distinct contribution to scholarly knowledge by expanding the geographical scope of their investigations, citizenship scholars need to address the challenge of comparability.

Keywords

Acknowledgment

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Going Global in Comparative Research on Citizenship: Facing the Challenge of Comparability

Émilien Fargues*

In a recent review of the comparative studies of citizenship and migration policies, Giacomo Solano and Thomas Huddleston (2021) note that the outstanding majority of the existing analyses concentrate on European and Western countries. With more than one third of immigrants worldwide settling in low or middle-income countries and three quarters of the refugee population living in African, Asian, Latin American and Caribbean states, this Western-centric perspective is problematic. It tends to perpetuate a conceptualisation of migration as a phenomenon that remains limited to the major destination countries in the OECD/Europe (Solano & Huddleston, 2021: 334).

Thanks to the work undertaken by different research teams, data on citizenship and migration policies are becoming available on a wide range of countries worldwide. To take but two examples, the 2020 edition of the policy-index Migrant Integration Policy Index (MIPEX) measures the policies to integrate migrants in 56 countries across five continents (Solano and Huddleston, *this collection*). In turn, the Global Citizenship Observatory (GLOBALCIT) provides a new database on the acquisition and the loss of citizenship that covers more than 190 independent states as of 2020 (Van der Baaren & Vink, 2021). The collection of these data makes it possible to develop new comparative research frameworks that go beyond the dominant European/Western-centred perspective that we find in citizenship and migration studies. The development of cross-regional comparative frameworks allows testing the generalisability of explanations for policy-variations more comprehensively and contributes to formulating new hypotheses and theories to account for both convergences and divergences across time and space. However, the need to adapt concepts and measurement tools to the different realities of citizenship and migration at the global level raises important challenges.

Drawing on the workshop that we convened in 2021 at the Robert Schuman Centre of the European University Institute,[1] contributors to this working paper have been invited to reflect on the opportunities and challenges in the development of a comparative research agenda on citizenship and migration at the global level.

My own contribution aims to synthesise the main arguments made in this collection, and to consider how they speak to each other, while delineating ways ahead for future comparative research. I first discuss the arguments made in favour of expanding our comparative scope beyond the OECD/Europe. I take the example of the persistence of discriminations towards women in citizenship transmission and acquisition as a topic worth investigating across regional contexts, using global comparative datasets. Then, I examine the conceptual and methodological challenges that the articulation of a global comparative perspective raises. One key difficulty that the contributors to this collection reveal is that of comparability, i.e., the limits and possibilities for comparison across contexts where citizenship might have different

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meanings and functions. The issue of comparability is a major challenge that researchers aiming to design large-N comparative frameworks should give top priority for it conditions the very validity of their results. Based on the contributions to this working paper, two main recommendations for the advancement of a comparative agenda at the global level stand out: the first is to accommodate as much as possible the specificities of each context within the construction of comparative frameworks; the second is to acknowledge the biases and limitations of the perspective that we, as researchers, take.

1. The promises of a global comparative agenda

As Rainer Bauböck underlines in this collection, one key ambition of citizenship studies is to explore patterns of diffusion of and resistance to state norms in nationality laws (e.g. acceptance of gender equality, acceptance of multiple citizenships, prohibition of statelessness, etc.). Scholars following this line of research seek to identify which causal mechanisms are likely to explain those patterns. The recent expansion of comparative datasets beyond Europe enables researchers to develop more comprehensive explanatory theories. In recent years, considerable progress has been made in this direction. The MACIMIDE Global Expatriate Dual Citizenship Dataset has for instance contributed to analysing the progress of tolerance towards dual citizenship for expatriates from the 1960s onwards in more than 150 countries (Vink, Schakel, Reichel, Luk & de Groot, 2019). There is thus scope for further research on the expansion of similar changing norms at the global level.

Let us take the example of gender equality in the transmission and acquisition of citizenship. Women have long been deprived of the right to confer citizenship on their children and spouse on an equal basis with men. The introduction of discriminations towards women (DTW) in nationality laws followed distinct patterns and timeframes from one country to another. As Betty de Hart explains (2006: 52), DTW are less the 'result of age-old patriarchal thinking' than an 'invention of the late-eighteenth century', often driven by migration concerns. For example, in the United States, it is not until 1907 that authorities passed a law to deprive of their American citizenship women who married foreigners. In Switzerland, marriage between Swiss women and German-Jewish refugees was also discouraged through similar legislation, but only in 1941. Interestingly, inequalities between men and women have often been extended by European countries to the legislations in the colonies. This largely explains why many African states discriminated against women at the time of their independences (Manby, 2018: 98). The history of DTW in the transmission of citizenship to children and the acquisition of citizenship based on marriage has been common to many countries worldwide.

DTW have largely disappeared in nationality laws, often very recently.[2] In Europe, formal equality with men was only achieved in 1973 in France, in 1975 in Germany, in 1983 in the United Kingdom, in 1986 in Austria and in 1992 in Switzerland (de Hart, 2006: 66). In Africa, the Lusophone socialist states and the Burkina Faso of Thomas Sankara were among the first to introduce equality between men and women in the 1970s and 1980s, together with Chad and Côte d'Ivoire as early as the 1960s (Manby, 2018: 98). More recently, we have seen discussions over the elimination of DTW in other African countries, Asia Pacific, Southern America and the Middle East.[3] Those discussions have not necessarily resulted

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[2] Gender-based discriminations are still present in the nationality laws of European countries though, especially if we consider discriminations in the transmission of citizenship to children that affect parents out of wedlock and LGBTIQ* parents. See Erdilmen & Honohan, 2020.

[3] For a panorama, see the Global Campaign for Equal Nationality Rights website: https://equalnationalityrights.org.

into amendments for more gender equality, but the elimination of DTW is becoming a salient political issue at the global level. DTW still persist in many countries situated in majority in Africa, Asia and the Middle East, leading to serious women's and children's rights violations as well as statelessness. The updated version of the GLOBALCIT database allows mapping those countries and disaggregating discriminations by mode of citizenship transfer (see Figure 1). In the GLOBALCIT database, modes A01a (descent based on birth in the territory), A01b (descent based on birth abroad), as well as A02a (citizenship at birth due to birth in country for second generation) and A02b (citizenship at birth due to birth in country for third generation) capture DTW in the transmission of citizenship to children, while mode A08 captures DTW in the transmission of citizenship to spouses. As of 2020, at least 25 countries still discriminated against women in the transmission of citizenship to children or spouses.

Figure 1. Discrimination against women in the transmission of citizenship to children and spouses in 2020

DTW / Children & Spouses   DTW / Children   DTW / Spouses   Source: GLOBALCIT Citizenship Law Dataset, v1.0 (Vink et al. 2021)
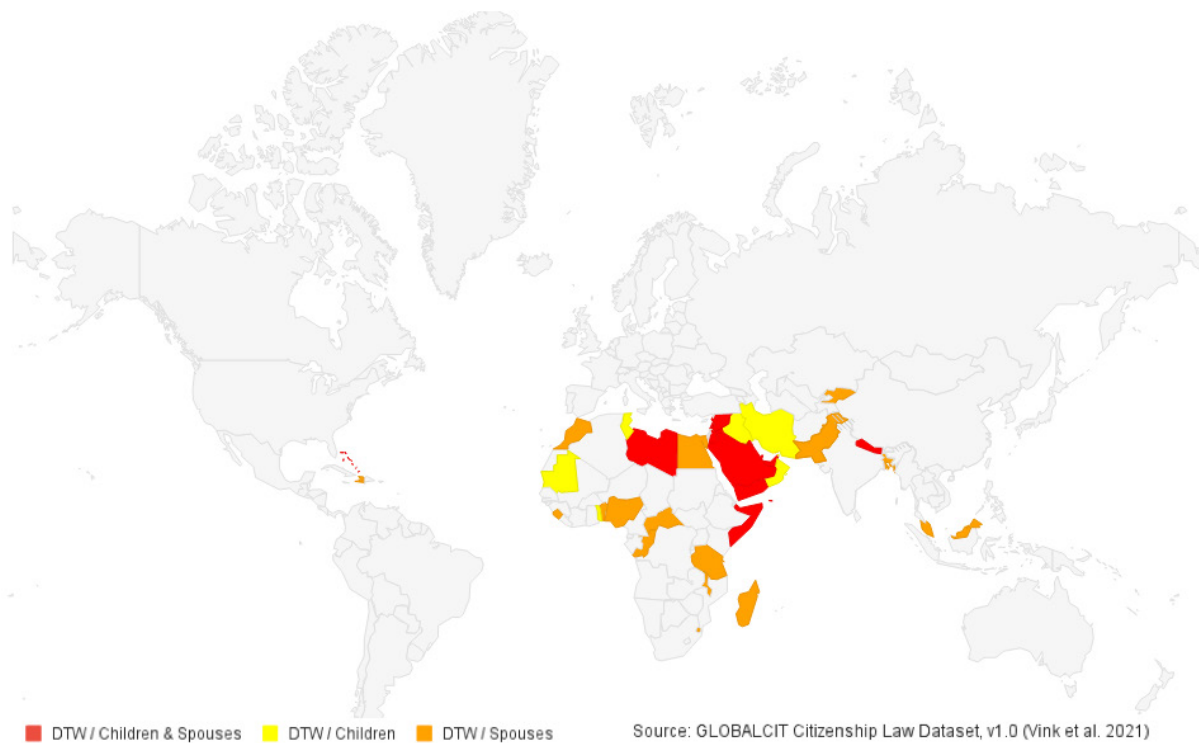
The persistence of DTW is often noticed but rarely explained in comparative studies at the global level (see Honohan & Rougier, 2018). Previous research has identified different mechanisms likely to explain patterns of diffusion of / resistance to gender equality across regional contexts. For example, building on an analysis of the elimination of gender-based discriminations in France, Germany and the United States, Diane Sainsbury (2018) insists on the interplay between domestic and international feminist activism to account for the gradual suppression of gender differentiation in citizenship acquisition. To explain the elimination of DTW in Africa, Bronwen Manby (2018) similarly underlines the crucial impact of women's rights networks at both the continental and the global levels. The expansion of comparative databases such as the GLOBALCIT Citizenship Law dataset will make it possible to test the impact of factors such as transnational feminist activism more comprehensively across other regional contexts. At present, the latest edition of the GLOBALCIT dataset provides a snapshot of the legislations in 190 countries as of 2020 and allows for cross-sectional comparisons (Van der Baaren & Vink, 2021). There is potential for more comprehensive cross-sectional analyses.

Scholars may for instance want to test the impact of cultural and religious structures on the persistence of DTW in more countries than what previous research has done (Frost, 2020). Moreover, the GLOBALCIT database should soon incorporate a complete set of both amended and unamended laws (see Vink, *this collection*), which will enable researchers to conduct more comprehensive longitudinal analyses on the elimination of DTW worldwide. Such a dataset will indeed represent a formidable starting point to investigate why certain countries or regions of the world went faster in the elimination of DTW than others and contribute to identifying patterns of diffusion of / resistance to gender equality. This global research agenda will also help understand why solutions that worked in some contexts did not in others and might open up new pathways for future reform towards more equality.

The example of gender equality in the transmission of citizenship thus shows that the construction of a global comparative research agenda in citizenship studies can be 'theoretically driven' (Goodman, 2015). The geographical expansion of comparative datasets promises even more comprehensive theories accounting for the diffusion of / resistance to changing norms in nationality laws. However, how can we ensure that this research agenda remains both conceptually and methodologically consistent? What are the risks and limitations that researchers should be aware of when going global? Contributors to this working paper provide important insights on those questions.

2. The challenge of comparability

The challenge of comparability, i.e. the limits and possibilities for comparison across contexts, represents no novelty in social sciences. Other generations of comparativists have been confronted with the difficulties that comparability raises. As Peter Mair (1998: 310) noted though, researchers tend to frequently ignore the challenge, and this has serious consequences on both theory-building and theory-testing:

> 'Precisely because the act of comparison is itself so instinctive to both scientific and popular cultures, [comparability] is sometimes assumed by researchers to be unproblematic and hence is neglected. And it is this neglect, in turn, which lies at the root of some of the most severe problems in the cumulation of research, on the one hand, and in theory-building and theory-testing, on the other hand'.

In contemporary citizenship studies, the expansion of comparative research at the global level is still at its early stage and is primarily concerned with the comparison of nationality laws. Living in a world of nation-states where regulations on the acquisition and loss of citizenship can be found in any country, the global comparison of nationality laws may seem natural and unproblematic. On the contrary, contributors to this collection underline that going global in citizenship studies raises serious issues of comparability. Jelena Džankić (*this collection*) warns against 'conceptual imposition', i.e., the presumption that the concepts we use to compare cases have the same meanings and implications across the world. Similarly, drawing on Giovanni Sartori (1970), Ashley Mantha-Hollands (*this collection*) argues that 'travelling problems' are likely to affect global comparative frameworks. If we want to avoid the risk of conceptual imposition, we need to ask ourselves how concepts can travel across contexts and reciprocally, how contexts might challenge our own conceptual assumptions. For example, scholars often assume that nationality introduces a sharp demarcation between 'citizens' and 'foreigners'. However, the boundaries of national membership may not be as sharp, depending on the contexts we consider. Kamal Sadiq (2008) has notably shown that in India, Malaysia, or Pakistan, immigrants who do meet the rules conditioning the right to enter and/ or stay in the territory still enjoy most of the benefits associated with formal citizenship. In

countries where large segments of the population are undocumented and where the state lacks effective surveillance technologies, the boundary between 'citizens' and 'foreigners' is blurred. From Sadiq's perspective, scholars aiming to build comparative frameworks that go beyond European countries should be very sceptical of the 'distinguishability assumption' – i.e. the idea that nationality laws establish a clear divide between 'citizens' and 'foreigners' – as it ignores the reality of thousands of immigrants in the Global South.

Issues of comparability in the global comparison of nationality laws become particularly salient when the comparative framework involves normative appreciations or categories (e.g. how liberal / how inclusive is the law?), as is the case with the construction of policy indices. Reflecting on the possibilities of expanding existing policy indices measuring the inclusivity of citizenship policies towards immigrants to a global perspective, Maarten Vink underlines the 'risk of violating the validity of the respective indicators' as there may not be functional equivalents across contexts (*this collection*). There may for instance be countries where the rule of law is not guaranteed or, as we have seen, where large segments of the population do not have access to documentation. In such contexts, inferring that a country is more inclusive towards immigrants based on the assessment of its nationality laws is problematic as the rules conditioning access to formal citizenship do not play the same 'gate-keeping' function as in other contexts (see Ashley Mantha-Hollands on this point, *this collection*). To mitigate those issues, researchers may be tempted to restrict the geographical scope using variables that make cases more comparable to each other. To expand policy indices on the inclusivity of citizenship laws towards immigrants, we might for example want to narrow down the scope by focusing on democratic countries. This would arguably limit the problem that inclusivity towards immigrants can hardly be inferred from the assessment of nationality laws in countries where the rule of law is not guaranteed. However, limiting the comparative scope to democratic countries may not be of great help to improve comparability. First, we see bureaucrats implementing citizenship and migration policies taking arbitrary decisions even in democratic countries (Spire, 2008). Second, the notion that the rule of law should be considered as a defining property of democracy and arbitrariness a defining characteristic of autocracy is highly contested (Geissel et al., 2016; Mérieau, 2018). We should thus be careful with regime dichotomies.

Both in the construction of their comparative designs and the interpretation of their results, scholars should resist the temptation of ready-made solutions to issues of comparability. As Rainer Bauböck and Jelena Džankić underline in their contributions, expanding the comparative scope at the global level carries a risk of oversimplification. As Jelena Džankić argues (*this collection*), most of the large-N comparative analyses rest on a 'vision of citizenship policies as qubits, which prevents scholarship from identifying where legal provisions are used to promote specific and often conflicting interests, such as those of expatriate and immigrant populations'. Similarly, Rainer Bauböck (*this collection*) warns against the 'holistic assumption' that large-N comparative frameworks risk reproducing, i.e. the 'implicit assumption that the rules for acquisition and loss of citizenship status hang together to form a coherent whole', driven by a single purpose (e.g. selecting immigrants). According to both authors, the expansion of the comparative scope in citizenship studies will only make a distinct contribution if researchers acknowledge that multiple purposes drive the evolution of citizenship policies. Another important aspect that is often subject to oversimplification in large-N comparative frameworks is the gap between law in the books and law in action, also known as 'implementation gap'. Rainer Bauböck (*this collection*) for instance notes that 'comparative social scientists often treat citizenship laws simply as data that indicate how open and inclusive a political regime is towards immigrants and diaspora populations', and thus forget about the implementation gap. In specific domains of citizenship policies where public authorities have traditionally enjoyed a wide discretionary power (e.g. ordinary naturalisation or citizenship revocation), research on

implementation should be given priority over the comparison of nationality laws as scholars should first interrogate the effectiveness of citizenship rules.

As Ashley Mantha-Hollands stresses (*this collection*), the methodological reflection on the challenge of comparability at the global level is still at its early stage in citizenship studies. More effort should be invested to develop this reflection, even more so since comparative datasets are currently being expanded globally. We can draw two main recommendations for the advancement of a comparative agenda at the global level from the contributions to this collection:

(1) The importance of accommodating as much as possible the specificities of each context within the construction of the comparative framework and the interpretation of the results.

Contributors to this working paper insist on the importance of building a global comparative approach that is context sensitive. Ashley Mantha-Hollands (*this collection*) points to the difficulty that the design of large-N comparative frameworks creates as researchers will often have 'asymmetric knowledge' about their cases. They therefore need to rely on local knowledge to adjust their concepts and methods to new contexts. According to Luicy Pedroza and Pau Palop-García (*this collection*), there is currently a structural imbalance in terms of data availability between the Global North and the Global South. Local knowledge is much easier to find in the Global North and this explains why much of the existing comparative research has focused on this area. Developing global comparative approaches in citizenship and migration studies requires investing in local research in the Global South and working towards a 'culture of shared knowledge' (Luicy Pedroza and Pau Palop-García, *this collection*).

Following the same reasoning, Samuel Schmid (*this collection*) also emphasises the importance of investing in local knowledge to go global in citizenship studies: 'to construct valid concepts and measures, we should move from concept specification and operationalization to concrete data and back in an iterative way'. In his contribution, he makes a stimulating proposal towards a valid global citizenship policy index that would measure the degree of inclusivity of citizenship regimes towards immigrants. Building on a review of past approaches to designing policy indices (the 'classical fixed indicators approach', the 'policy change approach', the 'flexible single indicator approach'), Samuel Schmid proposes a new 'hybrid' approach that has the advantage of relying on a consistent conceptual framework and being more context sensitive. Indeed, the hybrid approach allows for concept specification (i.e. it defines clear policy components against which the restrictiveness of citizenship laws will be assessed) and remains open to flexible indicators (i.e. each policy component can be used as a flexible indicator that accommodates functional equivalents). The hybrid approach may not answer all the questions that the challenge of comparability at the global level raises. For example, it does not answer the question as to whether 'inclusivity towards immigrants' is a notion that travels well across contexts, as Samuel Schmid admits. Still, it demonstrates that researchers can design innovative methodological frameworks to address the challenge of comparability.

(b) The importance of acknowledging the biases and limitations likely to affect the global comparative perspective.

Another key recommendation that stems from the contributions to this working paper is that researchers designing global comparative frameworks should be 'honest' (see Jelena Džankić, *this collection*) and always acknowledge what they leave out from their analyses. Limitations should be recognised at both the levels of conceptualisation and interpretation of the results. For example, as we have seen above, the comparative datasets that are currently being expanded

globally concentrate on citizenship laws and do not consider the level of implementation. This is an important limitation that has implications for the analysis of citizenship regimes. The global comparison of citizenship laws is a promising research agenda but, as Rainer Bauböck reminds (*this collection*), 'we need to be aware that comparing the rules contained in citizenship laws in principle only allows to test hypotheses about variation of legal norms across time and countries'. To take another example at the level of conceptualisation, gender differentiation and gender restriction in citizenship laws go beyond discriminations towards men and women. These two concepts also cover discriminations towards LGBTIQ* parents and couples in the transmission of citizenship to children and spouses. Comparative datasets may perfectly concentrate on discriminations towards men and women, as the new edition of the GLOBALCIT dataset does, but it is important to acknowledge that gender differentiation and gender restriction are concepts that reach beyond these specific types of discriminations.

Recognising limits and biases requires that researchers develop a reflection on their own 'positionality'. As Ashley Mantha-Hollands explains (*this collection*), 'scholars must not only keep in mind that their own research training and methodological strategies will shape results but also how their own positionality in research may influence the questions they ask, concepts they use, and interpretation'. Until present, such a reflection on positionality has been rather limited in citizenship studies compared to other research fields. The ongoing expansion of comparative research at the global level will necessitate further investments in this direction.

Conclusion

Of the five main pitfalls identified by Rainer Bauböck (*this collection*) in the articulation of a global comparative agenda on citizenship, the most challenging one is probably not letting our research be driven by available data. Data on the configuration and the evolution of citizenship laws will become increasingly available at the global level. The next edition of MIPEX will incorporate more than 56 countries, while new updates on the GLOBALCIT database will provide longitudinal data on the 190 states it presently covers. These are promising developments that will enable researchers to conduct cross-regional comparative studies and test the generalisability of various theories, old and new, across contexts. To make a distinct contribution to scientific knowledge, though, it is essential that researchers address the challenge of comparability. As I have explained, there are no ready-made solutions to this challenge. Understanding the limits and possibilities of comparison requires context sensitivity and reflexivity at every phase of the research process. This might seem an arduous task and one that we are never certain to fully achieve. It is my hope, then, that scholars wishing to expand comparative research on citizenship and migration globally will find stimulating reflections in this working paper to take up the challenge.

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Existing Indices on Naturalisation Policies: The Case of MIPEX

*Giacomo Solano and Thomas Huddleston**

Introduction

Over the last years, researchers have undertaken systematic comparisons of migration policies – mainly at the national level – by creating indicators and indices (Helbling & Michalowski, 2017; Scipioni & Urso, 2018). These indicators and indices have been used to analyse differences and trends in migration policy (Czaika & de Haas, 2013; Helbling & Kalkum, 2018).

This paper addresses naturalisation policies for migrants and their descendants by presenting the Migrant Integration Policy Index (MIPEX) 2020 – access to naturalisation strand. The MIPEX measures policies to integrate migrants in 56 countries across six continents (Solano & Huddleston, 2020).

Naturalisation policies have been analysed according to several existing indices. Naturalisation policies are the most frequently indexed areas of migration policy, according to a recent review of existing indices (Solano & Huddleston, 2021a). Of the 67 indices analysed by this review, 39 included indicators on naturalisation policies. However, these indices focus mainly on Western European countries (EU15). Germany, France, the Netherlands, Sweden and the UK are the five most frequently analysed countries, while other European and non-European Western countries have been analysed to a lesser extent.

There are of course exceptions. The most comprehensive and up-to-date set of indicators is the Global Nationality Laws Database from the Global Citizenship Observatory (GLOBALCIT), covering almost 200 countries (updated to 2020).[4] These indicators cover the modes of acquisition (i.e. *ius sanguinis*, *ius soli*, ordinary naturalisation and special naturalisation) and loss (renunciation and involuntary loss) based on 45 indicators. These were developed in the European regional context and then adapted and expanded globally by legal experts in national citizenship. These indicators allow for the design of citizenship regimes based on the respective purposes of these modes of citizenship acquisition and loss. Another exception is the MACIMIDE Global Expatriate Dual Citizenship database,[5] which covers policies on dual citizenship in 200 countries since 1960.

In general, the most common indicators on naturalisation included in indices are tolerance of dual nationality, the presence of birthright citizenship (*ius soli*), and the minimum residence duration and language/civic integration requirements for ordinary naturalisation (Solano & Huddleston, 2021b). Other recurring indicators are the level of entitlement vs. discretion for ordinary naturalisation, the costs/economic resource requirements, the existence of other civic integration measures and the provisions for specific groups, such as spouses of nationals and beneficiaries of international protection.

In what follows, after illustrating the MIPEX methodology, we present the main findings of the MIPEX 2020 edition concerning naturalisation policies. The contribution of this new edition of MIPEX is to expand the analysis of naturalisation policies to the so-called Global South, by

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*   Migration Policy Group.

4   See: https://globalcit.eu/national-citizenship-laws/

5   See: https://macimide.maastrichtuniversity.nl/dual-cit-database/

including additional non-European, non-Western countries, and linking naturalisation policies to the other areas of integration (e.g. labour market, education, permanent residence and health).

The Migrant Integration Policy Index: description, methodology and the access to nationality strand

The Migrant Integration Policy Index (MIPEX) is a tool which measures policies to integrate migrants in 56 countries across six continents, including all EU Member States (including the UK), other European countries (Albania, Iceland, North Macedonia, Moldova, Norway, Serbia, Switzerland, Russia, Turkey and Ukraine), Asian countries (China, India, Indonesia, Israel, Japan, Jordan, Saudi Arabia, South Korea, United Arab Emirates), North American countries (Canada, Mexico and US), South American countries (Argentina, Brazil, Chile), South Africa, and Australia and New Zealand in Oceania (Solano & Huddleston, 2020).[6]

Policy indicators have been developed to create a multi-dimensional picture of migrants' opportunities to participate in society. In the fifth edition (MIPEX 2020), the research team created a core set of indicators that have been updated for the period 2014-2019. The policy areas of integration covered by the MIPEX are the following: Labour market mobility; Family reunification; Education; Political participation; Permanent residence; Access to nationality; Anti-discrimination; and Health.

Under the 'Access to nationality' policy area, the following seven indicators were included: Residence conditions for ordinary naturalisation (number of years of residence); Citizenship for immigrant children (birthright and socialisation); Naturalisation language level; Naturalisation integration assessment; Economic resources; Criminal records; Dual Citizenship.

For each indicator, there is a set of options with associated values (from 0 to 100, e.g., 0-50-100). The maximum of 100 is awarded when policies meet the highest standards for equal treatment. For each of the eight policy areas, the indicator scores are averaged together to give policy area scores per country which, averaged together one more time, lead to the overall scores for each country.

Questionnaires, including indicators for the years 2014-2019, were completed by national experts (at least one per country). MPG team checked the experts' responses to guarantee that they properly understood the questions and answered them in a consistent manner as in other countries, and conducted a cross-time and cross-country consistency check.[7]

In what follows, we describe the main findings of the MIPEX 2020 'Access to nationality' strand.

Findings

Policies on access to nationality are halfway favourable for migrants in MIPEX countries. The average MIPEX country scores 44/100 on access to nationality policies, slightly lower than the average score for integration policies in general (49). However, of the eight policy areas, only education and political participation score lower than naturalisation policies (see Figure 1). This result reveals that nationality policies are generally weaker than integration policies in other

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6   See also: www.mipex.eu

7   See here for additional information on the methodology: https://www.mipex.eu/methodology

areas of integration. For example, when compared with permanent residence policies (average score: 58), naturalisation policies are less inclusive. This is reflective of the fact that in several countries being a permanent resident is a pre-requisite to being eligible for naturalisation.

Figure 1. MIPEX Policy areas
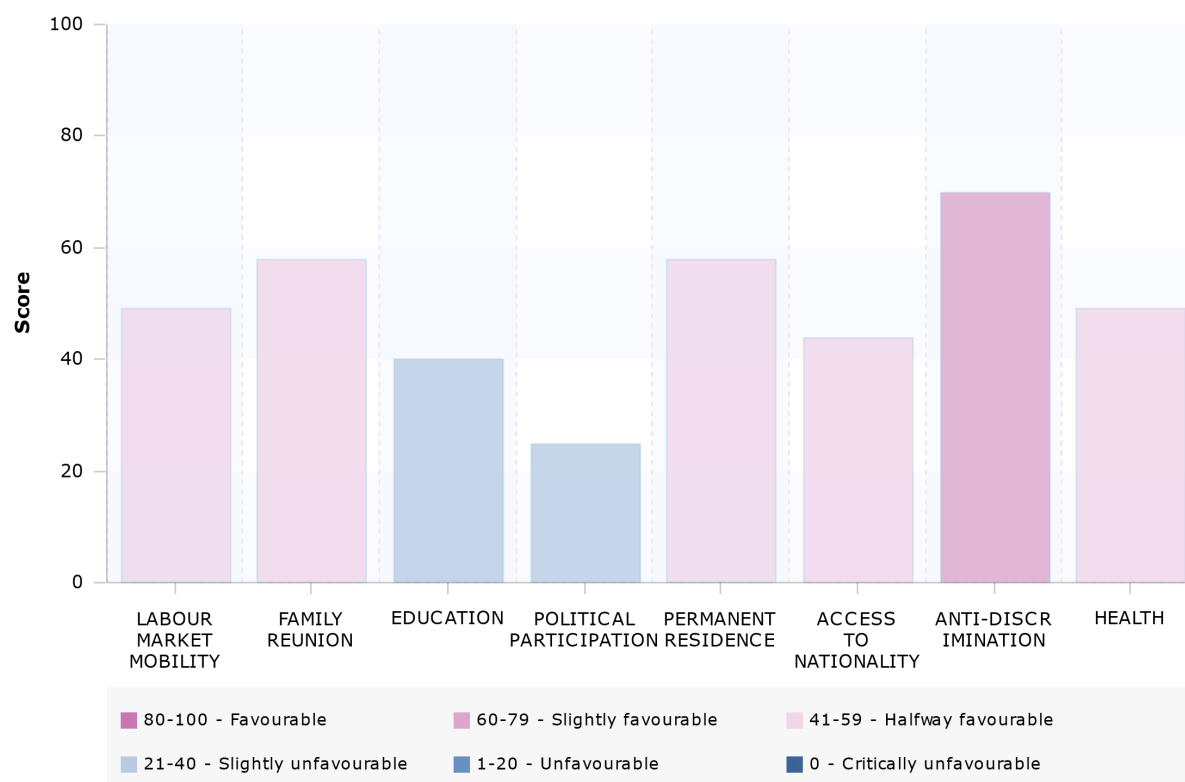
Source: mipex.eu

Naturalisation policies are a major area of weakness in many European and non-European countries, especially Austria, Bulgaria, the Baltics, Eastern Europe, India, Saudi Arabia and the UAE. (see Figure 2). 22 countries (out of 56) have rather unfavourable policies, with scores of lower than 41/100. In these countries, migrants face more obstacles than opportunities for naturalisation. By contrast, in 17 countries, naturalisation policies create more opportunities than obstacles (MIPEX score >59).

Figure 2. Countries' scores on access to nationality policies

■ 80-100 - Favourable	■ 60-79 - Slightly favourable	■ 41-59 - Halfway favourable
■ 21-40 - Slightly unfavourable	■ 1-20 - Unfavourable	■ 0 - Critically unfavourable
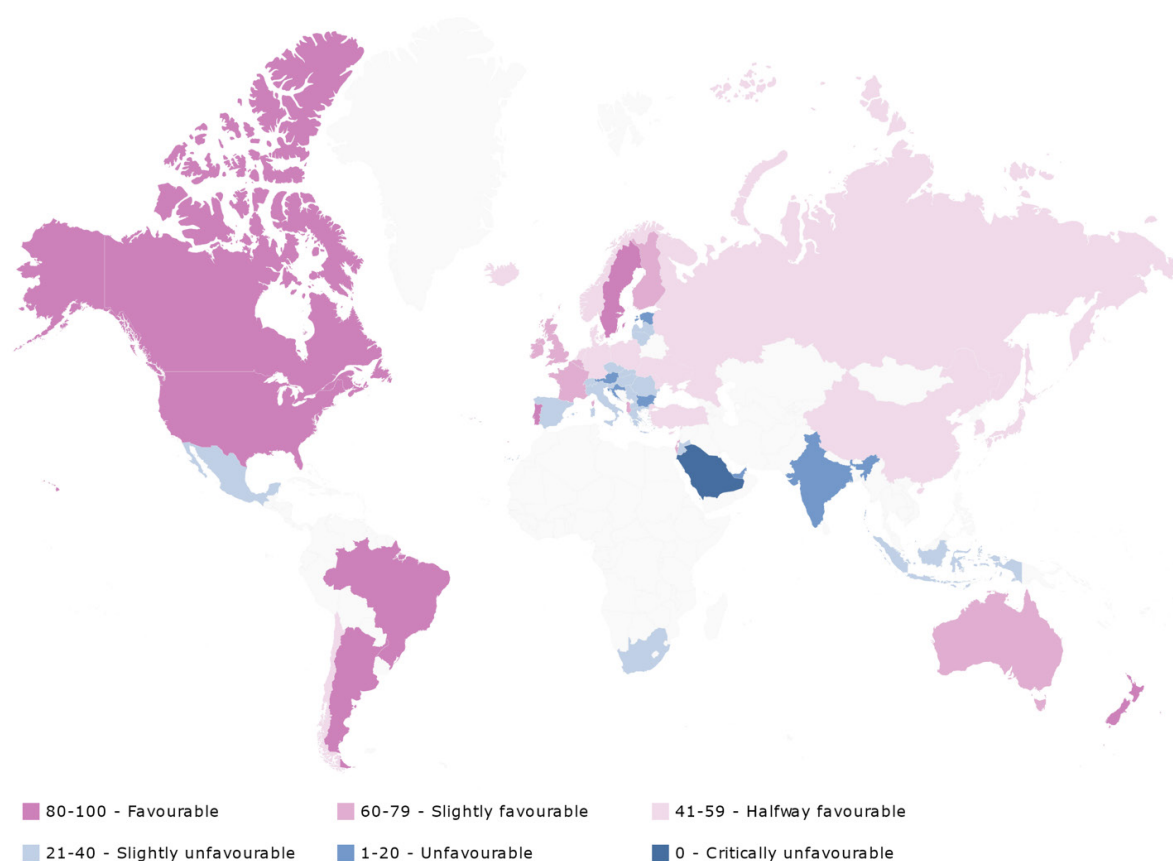
Source: mipex.eu

Furthermore, ordinary first-generation migrants face a wait of maximum five years for naturalisation in half of the MIPEX countries (23/56). In 20 countries however, migrants are only eligible after more than 10 years or the majority of ordinary residents cannot access naturalisation.

The situation is less favourable for children educated or born to foreign parents in several countries. Citizenship entitlements, which are often linked to specific requirements (related to the parents' status or to other requirements, e.g., age of majority), exist in half of the countries for such children (27/56). Among these countries, unconditional and automatic birthright citizenship for the second generation exists only in six countries: the North and South American countries included in MIPEX. In the other half of the countries (29/56), children must undergo a naturalisation procedure.

There are also multiple restrictive requirements in place: only 19/56 countries have zero or only one restrictive requirement. Requirements are particularly strict when it comes to criminal records in most countries (34/56). Applicants are ineligible if convicted of a crime, sentenced to imprisonment for more than five years, charged with other offences (e.g., misdemeanours or minor offenses) or if they have pending criminal procedures.

Requirements are less restrictive when it comes to language and integration, as well as income. Language requirements differ significantly across countries. Ten countries require only A1 proficiency or carry out no assessment; 19 require A2 proficiency and 27 require B1 proficiency or apply discretionary procedures. Immigrants do not face an integration

requirement in nearly half of the MIPEX countries (28/56). In the other half (28/56), they need to attend a course (only in Belgium and Luxembourg) or they must pass a test as part of the process. Proof of income or employment is required for citizenship in the (slight) majority of countries (37/56). 14 countries require that applicants demonstrate a minimum income, while the remaining 23 countries impose more demanding requirements.

Finally, dual nationality is fully embraced by a slight majority of countries (31 countries, including most recently Brazil, Moldova, Norway and Turkey), while 13 other countries only allow dual nationality based on exceptions.

Since 2014 nationality policies have not changed, on average. Between 2014 and 2019, the MIPEX 56 average score on nationality policies remained the same. Immigrants' access to nationality has improved significantly in Brazil and Luxembourg and, to lesser extent, in China, Latvia, Moldova, Portugal, Spain, Switzerland and Turkey. For example, in Luxembourg, the wait for first-generation immigrants was lowered from seven to five years and efforts to learn Luxembourgish are now rewarded, while the right to citizenship was regained by spouses and extended from the third- to the second-generation.

Some countries, however, introduced restrictive policies (4/56). Nationality policies have become more restrictive in Argentina, Denmark, Greece and Italy. Immigrants in Greece, for example, now have to wait twelve years before being eligible for naturalisation Despite this, in 2015 Greece introduced more favourable conditions for Greek-born children of immigrants.

Conclusions

In this short paper we presented the main findings of the MIPEX 2020, with a focus on naturalisation policies. Most indices addressing naturalisation policies focus on EU and Western countries (Solano & Huddleston, 2021a), while developing countries and emigration policies have been largely neglected. This trend follows a general bias in the wider field of migration studies, as shown by recent comprehensive reviews of the field (Levy, Pisarevskaya & Scholten, 2020; Pisarevskaya, Levy, Scholten & Jansen, 2019). There are exceptions to this trend. For example, GlobalCit and MIPEX have expanded their focus to the Global South.

These undertakings suggest that it is possible to 'go beyond' the European/Western countries. The results presented in this paper also make it clear that Western European countries do not systematically outperform other countries.

However, several challenges emerge in the fieldwork and in the analysis of the emerging trends. As underlined by Palop-García and Pedroza (2019), a first challenge is posed by the different, non-harmonised legal and policy systems. Therefore, researchers may find it more feasible and methodologically sound to conduct research in EU or Western countries. Applying European/Western standards is possible, but results need to be contextualised and cautiously interpreted. For example, some countries - such as China - emerge as having rather favourable naturalisation policies, as they do not set any specific language or integration requirements, but naturalisation is only accessible to a few, high-skilled or wealthy migrants. A second challenge is found in the fact that studies on migration polices suffer from the existence of a certain degree of discrepancy between policies on paper and policies in practice. In other words, inclusive policies can be badly implemented. Indexes expanding to the Global South might suffer in this respect even more, as developing countries have rather weak formal institutions.

Nevertheless, there is an overall need to expand analysis beyond Western countries, to understand the migration and integration policy frameworks of non-Western countries.

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Making Citizenship Regimes (More) Comparable Globally: Exploring the New GLOBALCIT Citizenship Law Dataset

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In December 2021, the Global Citizenship Observatory (GLOBALCIT) published a new GLOBALCIT Citizenship Law Dataset (Vink et al., 2021) that makes a further step towards the systematic comparison of citizenship laws around the world. In this contribution, I provide a brief introduction to the new Dataset (see Van der Baaren and Vink, 2022 for a more elaborate introduction) and subsequently explore the possibilities of the new Dataset for global comparison. In particular, I highlight the possibilities for global comparison that are greatly facilitated by the new structure of the Dataset and allow a) big picture analyses of the density of citizenship laws in terms of number of modes of acquisition and loss of citizenship; b) analyses of cross-national variation in the regulation of specific modes; c) analyses based on aggregation across modes based on specific types of conditions; and d) analyses that aggregate various types of conditions across various modes into a policy index. I end with some reflections on further development of the Dataset and on a global comparative research agenda of citizenship regimes.

1. A new GLOBALCIT Citizenship Law Dataset

Previously, the Global Databases on Modes of Acquisition and Loss of Citizenship (Vink and Vonk, 2021 [2016]) provided users with qualitative information on relevant provisions in citizenship legislation in 175 countries in 2016, categorised within a typology of so-called 'modes' that facilitated the comparison of rules applicable to the acquisition and loss of citizenship by similar target groups across countries. For example, mode A01a covers legal provisions applicable to the descent-based acquisition of citizenship by children born in the country of the respective citizenship; mode A01b covered similar rules applicable to those born abroad; etcetera. This comparative typology was initially developed in the context of fifteen European Union countries (Waldrauch, 2006) and subsequently fine-tuned and systematised to allow a global comparison of citizenship laws (see Van der Baaren and Vink, 2022 for a discussion of the application of the functional comparative method).

The new GLOBALCIT Citizenship Law Dataset provides an update and expansion of the existing 'modes' databases on four fronts. First, the geographical coverage of the Dataset has been expanded and now includes 190 independent states, including micro-states from Polynesia that were previously not yet covered (see Dziedzic, 2020). Second, all information has been updated and now covers the legal situation on January 1, 2020. Third, whereas the previous version of the database on modes of acquisition of citizenship included only summarised information for a single A06 mode on residence-based citizenship acquisition, the new Dataset (following Jeffers et al., 2017) provides specific data for selected requirements for residence-based citizenship acquisition, in particular:

- residence requirement, in nominal years (A06a)

- dual citizenship acceptance (A06b)

- language conditions (A06c)

- civic knowledge or assimilation conditions (A06d)

- criminal record conditions (A06e)

- economic resource conditions (A06f)

By splitting up mode A06, comparison of specific requirements for residence-based acquisition is now systematised and enhanced. All in all, these changes imply that the new Dataset has 9310 country-mode entries, covering 34 acquisition modes and 15 loss modes in 190 countries (see codebook, Vink et al., 2021b for complete overview of modes covered within this revised comparative typology).

Fourth, and most important, in addition to qualitative summary descriptions of the relevant legal provisions on the acquisition and loss of citizenship (incl. references to the relevant article in the law), the new Dataset now also includes a coding scheme that identifies the main categorical distinctions between legal provisions across countries. We included two types of coding: a) a binary code to indicate whether in case of the country concerned a particular ground for the acquisition or loss of citizenship is present in the citizenship legislation ('1' if the mode is applicable and '0' if the mode is not applicable); and b) a categorical code that identifies, if the mode is in effect (coded 1 in the binary scheme), the type of conditions applicable for the acquisition or loss of citizenship in the respective country. The number of categories varies by mode, according to the standardised list of conditions that are detailed in the codebook (Vink et al., 2021b). While binary coding enables users to see in which countries a particular mode is either applicable or not, categorical coding enables users to identify differences between those countries where a particular mode of acquisition or loss of citizenship is applicable. Hence, in contrast with the previously existing version of the online database, users are now able to identify and analyse patterns in terms of groupings of countries, or focus on particular distinctions between countries (e.g. singling out gender discrimination).

2. Data exploration

In this section, I highlight various ways in which the systematised data on modes of acquisition and loss of citizenship from the new Dataset can be used for descriptive purposes.

Frequencies I: applicable number of modes of acquisition of citizenship by country/regime

An obvious first possibility of the newly systematised data is to use the binary versions of the variables (A01a_bin, for mode A01a; A01b_bin, for mode A01b; etcetera) for a 'big picture' description of the frequency of the number of applicable modes of acquisition of citizenship across countries (for a similar focus on loss of citizenship, see Van der Baaren and Vink, 2022). This is visualised in Figure 1, which shows that the median number of modes of acquisition of citizenship applicable across the 190 countries included in the Dataset is 11, out of a total of 28 acquisition modes.[8] Yet, as is clear from the normal distribution visualised in Figure 1, there is considerable variation, with one country (Uruguay) having only two birthright-based acquisition modes in its citizenship law (A01b, A02a), whereas in Greece up to 24 out of a total possible 28 acquisition modes are applicable. The top 5 countries with most applicable number of acquisition modes are all European.

Only one acquisition mode (A01b, citizenship acquisition by a person who is born abroad to a parent who is a citizen of that country) is applicable in all 190 countries. Other frequently present acquisition modes are those for residence-based acquisition (A06), marriage-based

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8   Here I focus only on the 'main' modes of acquisition, incl. A06 for residence-based acquisition and leave aside modes A06a-A06f which specify the conditions for naturalisation, where A06 is applicable.

naturalisation (A08), citizenship acquisition by a person born in the country to a parent who is a citizen of that country (A01a) and reacquisition of citizenship (A16).

Figure 1. Number of modes of acquisition of citizenship per country

Mean=11.5 | Median=11 | N = 190 | 28 modes

Top 5 most frequent modes of acquisition:

A01b. Descent (birth abroad) (190)

A06. Residence-based naturalisation (175)

A08. Marriage-based naturalisation (168)

A01a. Descent (birth in country) (158)

A16. Reacquisition (157)

Countries with least modes of acquisition:

Uruguay (2)

Myanmar (4)

Palau (4)

Countries with most modes of acquisition:

Greece (24)

Austria (20)

Czech Republic (20)

Finland (20)

Germany (20)

Source: GLOBALCIT Citizenship Law Dataset, v1.0

By using the iso3 identifiers included in the Dataset, it is now also easy to merge GLOBALCIT data with data from other sources, such as the Varieties of Democracy project (Coppedge et al., 2021)[9] and explore patterns of citizenship law regulation by, for example, regime type. Figure 2 shows a density plot (i.e. the smoothed distribution) for the number of acquisition and loss modes by country, by political regime. The main conclusion from this exploration is that, on average, democracies have more applicable modes of acquisition of citizenship, but fewer applicable modes of loss of citizenship.

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9   For the 19 micro-states not covered by V-Dem, I have relied here on scores from Freedom House, scoring those free or partly free countries with a Global Freedom score of higher than 55 as democratic. Source: https://freedomhouse.org/countries/freedom-world/scores.

Figure 2. Number of modes of acquisition and loss of citizenship per country, by political regime: density plot

Acquisition of citizenship (28 modes)
Mean (autocracy) =10.2 | Mean (democracy)=12.2

Loss of citizenship (15 modes)
Mean (autocracy) =5.8 | Mean (democracy)=5.3
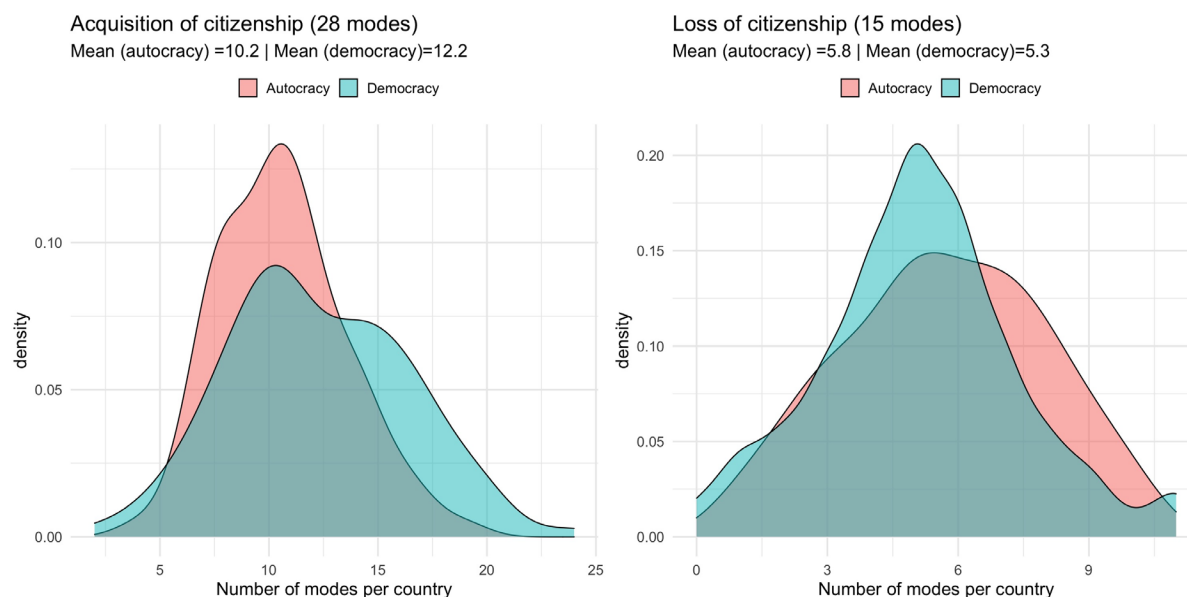
Sources: GLOBALCIT Citizenship Law Dataset, v1.0 | VDEM, Freedom House

Frequencies II: conditions by mode

Besides the number of modes, the new Dataset also facilitates identifying the relevant *type of conditions* for the acquisition or loss of citizenship, where respective modes are applicable. These frequencies of relevant conditions can be explored by individual acquisition or loss modes, or – in those cases where the relevant categories are comparable (see Codebook, Vink et al., 2021b) – explored between multiple modes. Figure 3 visualises the distribution of applicable conditions for the descent-based acquisition of citizenship by persons born in the country (A01a, left-hand plot) or abroad (A01b, right-hand plot).

The distribution of relevant conditions for descent-based acquisition of citizenship visualised in Figure 3 shows that in most countries a father or mother who is a citizen suffices to acquire the citizenship of that country: *ius sanguinis* is generally applicable in 65% of countries if the child is born in the country, and in 54% of countries in case the child is born abroad (cf. Honohan and Rougier, 2018, Figure 1 for a broadly comparable picture, but with some differences due to other coding methodology). Besides gender or wedlock restrictions, or group-based discrimination, countries also apply dual citizenship restrictions or what is termed in the Dataset as a generational transmission restriction, where the acquisition of citizenship is dependent on the birthplace or place of residence of the child or parent.

Figure 3. Birthright citizenship by descent: type of provisions around the world

A01a. Citizenship by descent (birth in country)

No provision	17% — 32
[n.a.]	
Group restriction	2% — 4
Gender restriction	8% — 16
Wedlock restriction	4% — 8
Dual citizenship restriction	4% — 7
Generally applicable	65% — 123

Number of countries with type of provision (% in red)

A01b. Citizenship by descent (birth abroad)

No provision	
Generational transmission restriction	21% — 40
Group restriction	2% — 4
Gender restriction	9% — 17
Wedlock restriction	3% — 5
Dual citizenship restriction	11% — 21
Generally applicable	54% — 103

Number of countries with type of provision (% in red)

Source: GLOBALCIT Citizenship Law Dataset, v1.0

Figure 4 visualises the distribution of the nominal years of residence required for residence-based acquisition of citizenship, based on a new variable A06a_yrs included in the Dataset that records the precise number listed in the citizenship legislation. As mentioned in the Codebook (Vink et al., 2021b: 25), additional conditions related to residence are not coded, even if these can significantly impact the scope of the residence condition. Hence the information provided by this variable should be interpreted with care, i.e. as representing variation in the nominal years listed in the law, *not as effective residence requirement.* With this caveat, we find that the most frequent nominal residence-requirement is five years (in 77 countries) and that most countries (161) have a residence requirement of maximum ten years. Fourteen countries have a higher residence requirement, up to thirty years in the United Arab Emirates or even forty years in Equatorial Guinea. In fifteen countries, no residence-based acquisition provision could be identified.[10]

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10   Provisions restricted to a specific group of persons based on existing citizenship, race, religion, language or ethnic characteristics, are coded under A18 (citizens of specific countries) or A19 (cultural affinity-based acquisition). Residence-based acquisition (A06) also excludes acquisition based on marriage (A08/A13), or provisions for acquisition by refugees (A22) or stateless persons (A23). Provisions based on special achievements or financial assets or investments are coded under A24 or A26.

Figure 4. Residence-based acquisition of citizenship: years of residence in country required*

*refers to nominal number of years listed in citizenship legislation; effective residence requirement may vary in practice
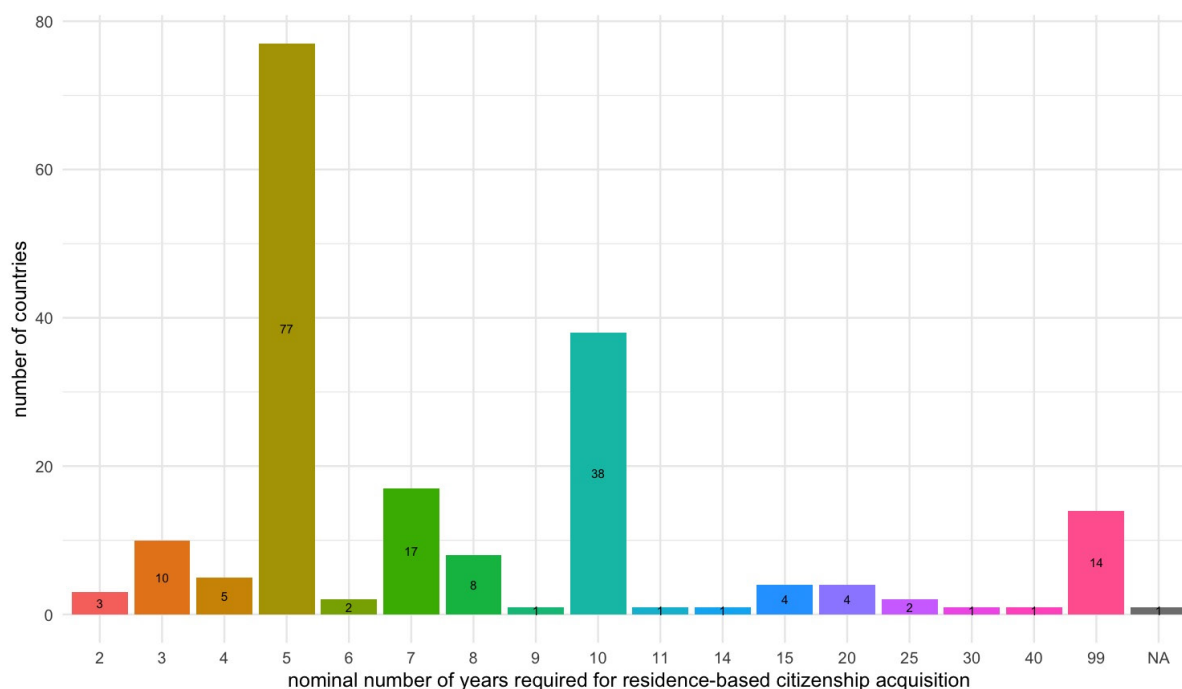
Source: GLOBALCIT Citizenship Law Dataset, v1.0

Aggregation I: combining modes of acquisition/loss into categorical variables

The new categorical coding scheme implemented in the Dataset facilitates also descriptive analysis beyond individual modes of acquisition, by generating new categorical variables combining associated modes. I present two examples here.

Figure 5 visualises the distribution of countries for a territorial birth-based acquisition of citizenship variable, combining information from modes A02a (ius soli for the 'second generation') and A02b (ius soli for the 'third generation', sometimes termed 'double ius soli'). For simplicity's sake, I leave aside additional related variables, such as those for foundlings (A03a), children who would otherwise be stateless (A03b) or those who are born on territory and can acquire citizenship at a later age (A05). With that caveat, we see that unconditional ius soli, such as mostly present in the Americas, may be exceptional, but is still present in up to 19% of countries globally. Moreover, a form of conditional ius soli is present in another 18% of countries, where children born on the territory only acquire the citizenship of that country, irrespective of the parental citizenship, if a parent is born her/himself on the territory or fulfils a certain residence requirement. In thirteen countries, gender or group restrictions apply.

Figure 5. Citizenship by birth in country
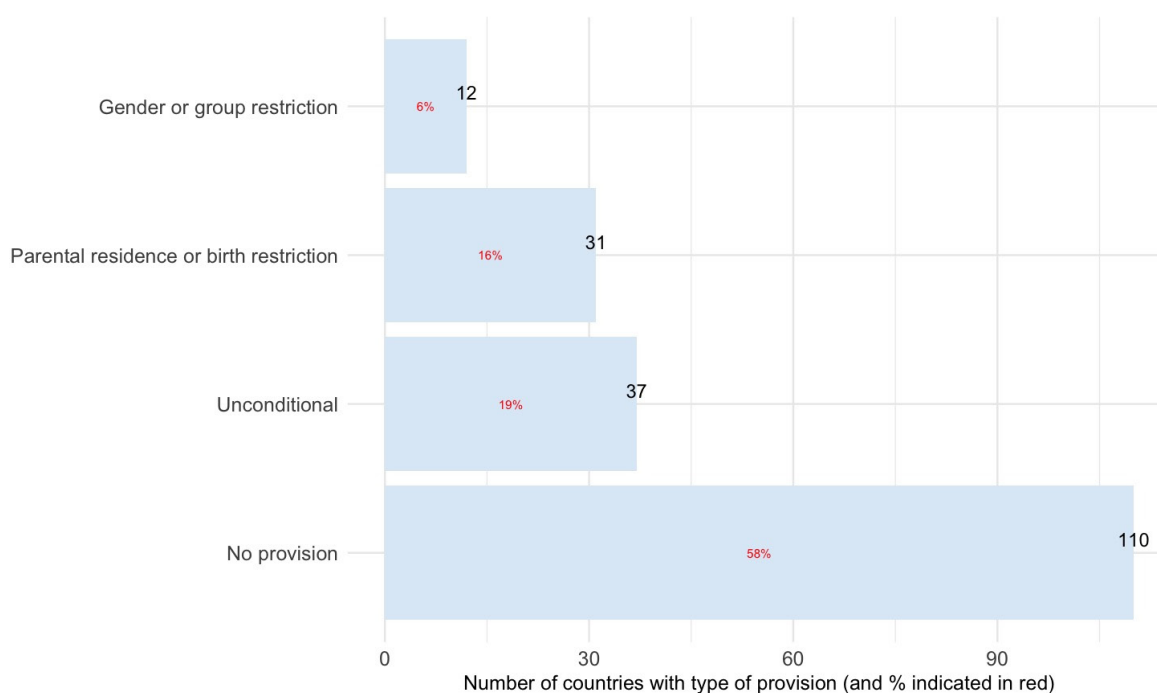
Source: GLOBALCIT Citizenship Law Dataset, v1.0, variables: A02a_cat, A02b_cat. Excluding provisions aimed at protecting against statelessness and those that only grant citizenship later in life.

In Figure 6, the distribution of countries is visualised based on a combination of one 'acquisition' and one 'loss' mode, which jointly reflect a country's broad approach to dual citizenship acceptance at naturalisation. Whereas mode A06b records whether a country requires applicants for naturalisation to renounce their previous citizenship (dual citizenship acceptance for 'incoming' naturalisations), mode L05 records whether a citizen loses her or his citizenship if she/he voluntarily acquires another citizenship (dual citizenship acceptance for 'outgoing' naturalisations). In 2020, half of all countries around the world fully accept dual citizenship, whereas only 22% of countries consistently restrict dual citizenship at naturalisation. Almost a third of countries only accept dual citizenship for immigrants (12%, incoming naturalisation) or for emigrants (17%, outgoing naturalisations).

Figure 6. Dual citizenship acceptance for immigrants and emigrants
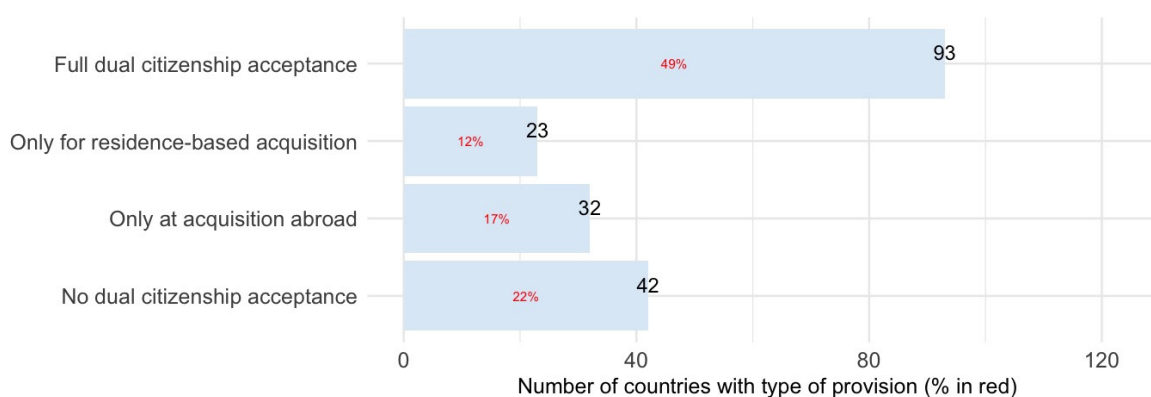
Source: GLOBALCIT Citizenship Law Dataset, v1.0, variable: dualcit_comb. Immigrant dual citizenship acceptance if residence-based naturalisation and no effective renunciation requirement (A06b); Emigrant dual citizenship acceptance if native citizens can naturalise abroad without losing citizenship (L05).

Aggregation II: combining modes of acquisition/loss into count or continuous variables

Finally, the categorical coding scheme implemented in the Dataset can be employed to generate count or continuous variables combining scores on associated modes. I present two examples here.

First, I give an example of a discrete variable that counts the number of provisions on acquisition or loss of citizenship that can be considered at odds with what I would see as generally accepted standards on non-discrimination and individual choice. In particular, I count the presence of provisions that make arbitrary distinctions based on gender or belonging to a particular group (e.g. ethnicity, race or religion); the absence of residence-based acquisition within fifteen years[11]; and the possibility to voluntarily renounce one's citizenship. The point here is not about what precisely makes up 'liberal' or 'illiberal' norms in citizenship law (see e.g. De Groot and Vonk, 2016, esp. pp. 3-82 for an introduction to international standards on nationality law; on gender discrimination, see eg Stratton, 1992) and I do not pretend that this list of criteria is either exhaustive or uncontroversial. What matters here is to illustrate how the categorical coding scheme of the data on modes of acquisition and loss of citizenship facilitates descriptive or explanatory analyses of cross-national variation in adherence to international standards on non-discrimination and minimal individual choice in citizenship law, in the sense of Article 15(2) of the Universal Declaration of Human Rights, which proclaims that no one can be 'denied the right to change his nationality'.

Figure 7 visualises a count of the presence of such 'illiberal' provisions in ten selected modes of acquisition or loss of citizenship, focusing on birthright-based citizenship acquisition, residence-based naturalisation, marriage-based naturalisation and voluntary renunciation (see list of respective modes at bottom of the plot). Users of the Dataset can generate variations of this plot, selecting different modes of acquisition/loss or focusing on different types of

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11 I purposively use a long time period here, in order to distinguish between those countries where naturalisation, generally speaking, is accessible within some foreseeable time frame, and those countries where that is not the case, i.e. singling out the 23 countries identified in Figure 4 where naturalisation is not possible within 15 years.

categorical distinctions covered by the Dataset (see Codebook for details). Within this selection of modes and conditions, in one-third of 190 countries (35%) at least one or more provisions in the citizenship law include arbitrary discrimination or do not provide for individual choice. In countries such as Brunei, Liberia and Sierra Leone, up to 6 modes with illiberal provisions in citizenship law are counted (see e.g. Khan, 2021, for the GLOBALCIT country report on citizenship law in Sierra Leone).

Figure 7. Illiberal provisions* in selected modes of acquisition or loss of citizenship

*Arbitrary discrimination based on gender or group restrictions; no residence-based acquisition within 15 years; no/restricted voluntary renunciation (10 selected modes)
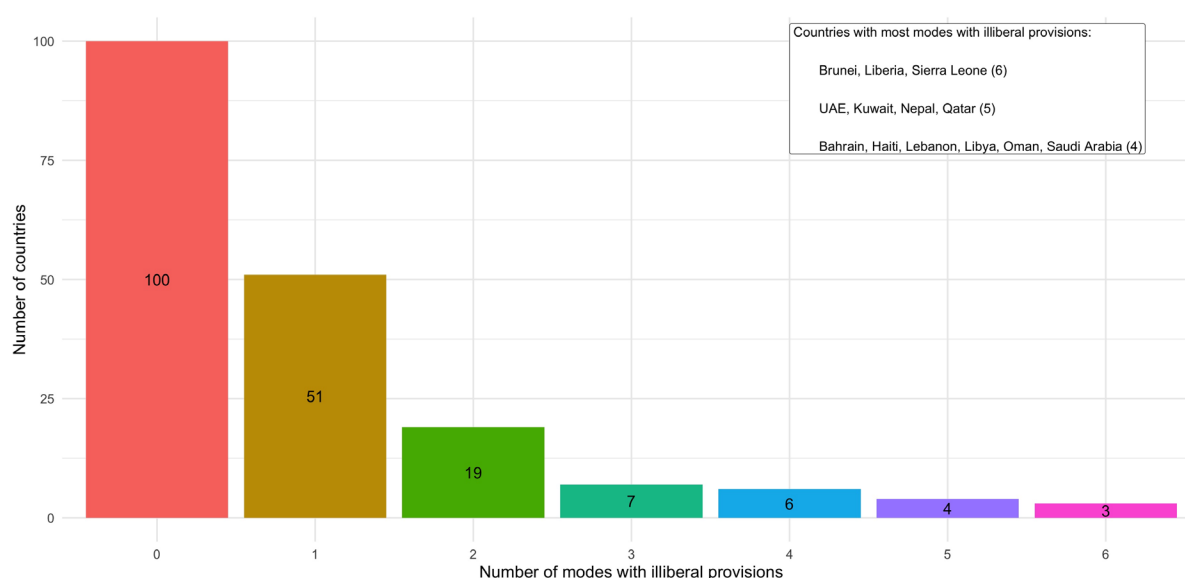
Source: GLOBALCIT Citizenship Law Dataset, v1.0, variables: A01a, A01b, A02a, A02b, A03a, A05, A06, A06a, A08, L01

Second, the new Dataset allows combining modes of acquisition/loss into continuous variables, for example for the purpose of developing policy indices on the inclusiveness of citizenship law for immigrants and their descendants (see Schmid, *this volume*; for discussions of policy indices on immigration and integration policy, eg Bjerre et al., 2015; Goodman, 2019). Here I illustrate how Samuel Schmid's Citizenship Regime Inclusiveness Index (CITRIX) can be extended geographically beyond the 23 OECD countries used in Schmid (2021), by applying his aggregation formula[12] to the information from the global Dataset. To limit the risk of violating the validity of the respective indicators as functional equivalents across a wide variety of contexts (e.g. where rule of law is not guaranteed, or where there are large segments of the population without formal legal identity), I restrict my analysis to a set of 68 countries a) with democratic regimes (either electoral or liberal democracy); b) where birth registration rates are higher than 90%; and c) residence-based naturalisation is available within max. 15 years of taking up residence.

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12   CITRIX Global = (2*jussoli2 + jussoli3)/3 + residur + dualcit + (langtest + cittest + ecoreq + crimreq)/4)/4. The equivalent indicators used in the analysis are, respectively: A02a_cat, A02b_cat, A06a_yrs, A06b_cat, A06c_cat, A06d_cat, A06f_cat, A06e_cat. Replication code available here.

I assess the validity of the CITRIX Global measure by analysing its correlation with Schmid's CITRIX (v2) score, for those 23 countries that are covered by both datasets (see Figure 8, left-hand plot). Overall, there is a very strong correlation and significant between both measures (r = .88, $p < 0.001$). I also look at the correlation with another comparable measure, the scores from the 'Access to Nationality' strand of the Migrant Integration Policy Index (MIPEX) (Solano and Huddleston, 2020), which has 44 cases in common with CITRIX Global, and find a slightly weaker, but still high and significant correlation (Figure 8, right-hand plot, $r = .81$, $p < 0.001$). These findings, based on a first exploratory cut of the new GLOBALCIT data, suggest that these data can be used as a basis for index construction a la CITRIX or MIPEX, and offer the potential to substantially enlarge the geographical scope of those measures.

Figure 8. Correlation CITRIX Global, Citrix v2 and MIPEX Access to Nationality

Source: GLOBALCIT Citizenship Law Dataset, Schmid 2021, MIPEX (2020)
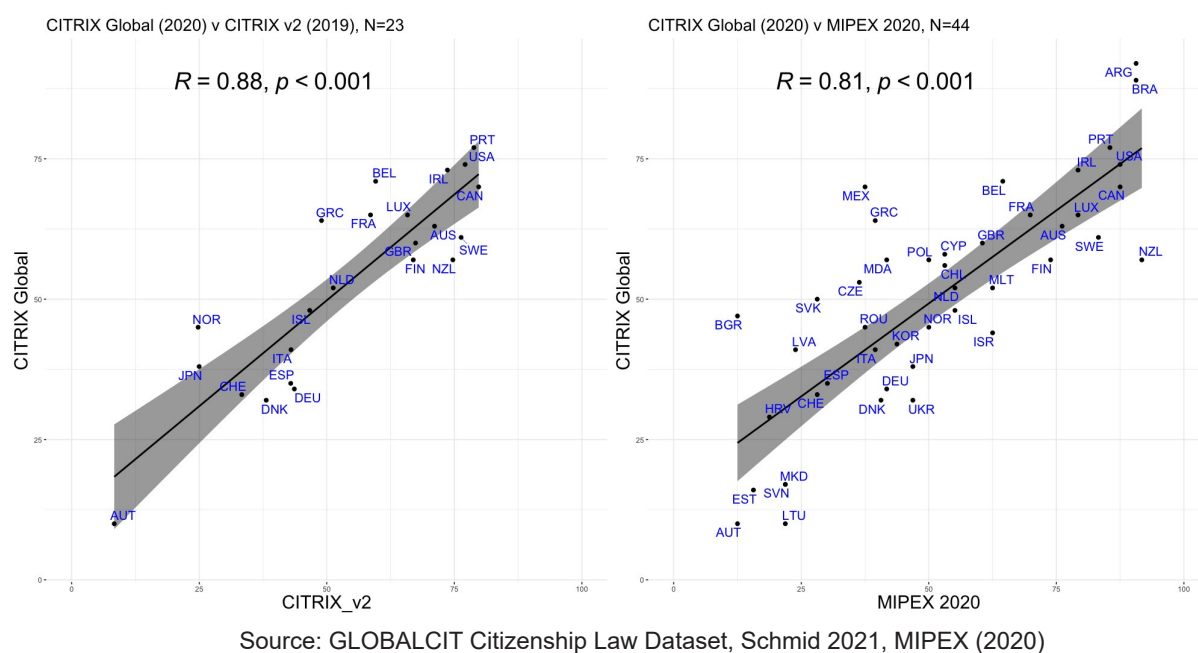
Subsequently, Figure 9 plots the CITRIX Global scores for the 68 selected countries. Scores range from 92 for Argentina, representing the country with the most inclusive citizenship law for immigrants and their descendants, to Liechtenstein with a score 4, representing the lease inclusive country. As is clear from the CITRIX aggregation formula, ius soli weighs heavily (25%) in the CITRIX Global score and hence, unsurprisingly, countries from the Americas dominate the top of the list. The highest-ranked European country is Portugal with a CITRIX Global score of 77, reflecting conditional ius soli for the 2nd generation and automatic access to citizenship for the third generation, plus an overall highly accessible residence-based naturalisation procedure. In addition to the weight of ius soli, due to normalisation of the variable that counts the years of residence required for naturalisation (based on A06a_yrs) and a number of countries in the Americas requiring only 3 or 4 years of residence, even a country such as Sweden that is one of the countries with the most inclusive citizenship laws in the European contexts (with a residence-requirement of 5 years for naturalisation), falls back to the middle of the pack in global perspective. Again, these CITRIX Global score are not presented here as a definite pitch on how best to measure accessibility of citizenship laws for immigrants and their descendants from a global perspective, but rather to illustrate how the new GLOBALCIT data lend themselves for exercises that aim to explore how combined scores on various indicators of the accessibility of citizenship can be represented in policy indices.

Figure 9. CITRIX Global
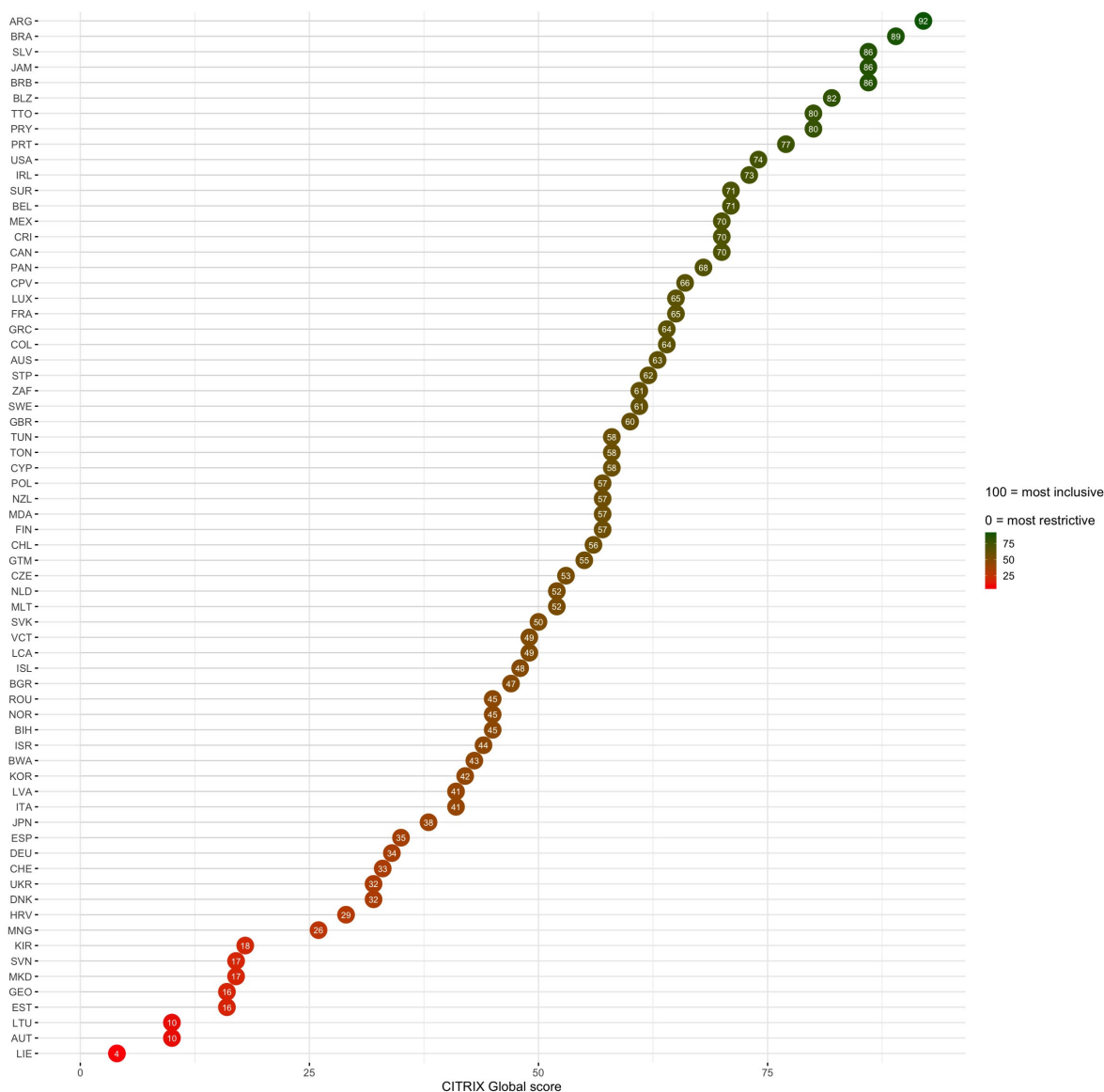
Source: GLOBALCIT Citizenship Law Dataset, v1, calculation based on aggregation formula from Schmid (2021), N = 68, 2020

3. Where to go from here?

In my contribution to the discussion in this Working Paper I aimed to highlight how the possibilities for global comparison are greatly facilitated by the new structure of the GLOBALCIT Citizenship Law Dataset. I provided various examples of how the newly structured data on modes of acquisition and loss of citizenship lend itself more easily for descriptive analyses, albeit 'big picture' analyses of the density of citizenship laws in terms of number of modes of acquisition and loss of citizenship or analyses of cross-national variation in the regulation of specific modes. I also highlighted ways in which the data can now be used to aggregate scores across modes based on specific types of conditions to aggregate types of conditions across various modes into a count variable or a policy index.

Where to go from here? First of all, I would emphasise that the current Dataset is explicitly seen as a version 1.00, i.e. a Dataset that we aim to continuously update in order to provide up-to-date information on citizenship laws. A next update is foreseen for 2023, where we update the data to the situation on 1 January 2022. Second, apart from updating, we also plan -and have started- to back-code the data, in order to provide longitudinal information on citizenship law development. We will initially do so for selected indicators, eg on birthright or dual citizenship (expanding e.g. the data from Vink et al., 2015 to cover not just automatic loss provisions, but also data on renunciation requirements for residence-based naturalisation). From there, the ambition is to gradually expand the longitudinal coverage to all relevant modes of acquisition and loss of citizenship. Third, I hope that providing more user-friendly data on citizenship law in a transparent and accessible manner will enhance the research agenda on comparing citizenship regimes (cf. Vink, 2017). I look forward to all those new studies using these data for descriptive purposes, eg on how existing citizenship regime typologies can be extended globally (cf. Vink and Bauböck, 2013) or for explanatory purposes on e.g. the political, demographic or economic determinants and implications of citizenship regime variation.

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Towards a Valid Global Citizenship Policy Index: Three Existing Approaches and a New Hybrid Approach

*Samuel D. Schmid**

In this contribution, I sketch the contours of a new hybrid approach to measure citizenship laws across the globe. I start by discussing the issue of validity and the related problem of cross-national equivalence when developing indicators that capture legal realities, that is, laws on the books. I then present three existing approaches to index building as applied to citizenship policies: the "classical fixed indicators approach" using three-level concepts, the "policy change approach", and the "flexible single indicator approach." My hope is that the new hybrid approach maximizes the advantages of each existing approach, while minimizing their disadvantages. It may help us pave the way for a valid global citizenship policy index.

To move towards such a valid global index, I think we need to go back to the basics of measurement validity. The seminal piece by Adcock and Collier (2001) is useful here. They argue that to construct valid concepts and measures, we should move from concept specification and operationalization to concrete data and back in an iterative way. This is especially true for global indices, as new cases and available data might create the need to adjust concepts and operationalizations. We must be aware further that the notion of validity is bound to specific cases and settings, and that a global approach needs to be sensitive to these contexts. We should be on the lookout especially for functional equivalents as we search for varying instances of concepts across space and time.

The "classical fixed indicators approach" to citizenship policy measurement is not sensitive to context. Figure 1 shows the concept tree of the Citizenship Regime Inclusiveness Index (CITRIX; Schmid, 2021). It aims to capture the inclusiveness of the access to citizenship for immigrants and their children. This approach uses a three-level approach to concept formation (Goertz, 2006; 2020). On the basic level there is the overarching concept or policy idea. Here the aim is to have a systematic idea of what it is we are measuring. On the second level there are the constitutive components or dimensions of the concept. Here, the aim is to cover all relevant aspects and to find a balance between minimalism and maximalism (Munck and Verkuilen, 2002). Based on the literature and other indices, CITRIX does so by covering conditions regarding birthright, residence, renunciation, and integration. It therefore focuses on the ordinary naturalization of ordinary immigrants and their children. Only on the third level do we find the indicators that operationalize the components. Note that classical statistical approaches usually drop the second level and often apply some form of latent variable modeling to all individual indicators to create an aggregate measure. I omit the issue of aggregation in this contribution (for details see Schmid, 2021).

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Figure 1. The concept tree of the Citizenship Regime Inclusiveness Index (CITRIX)
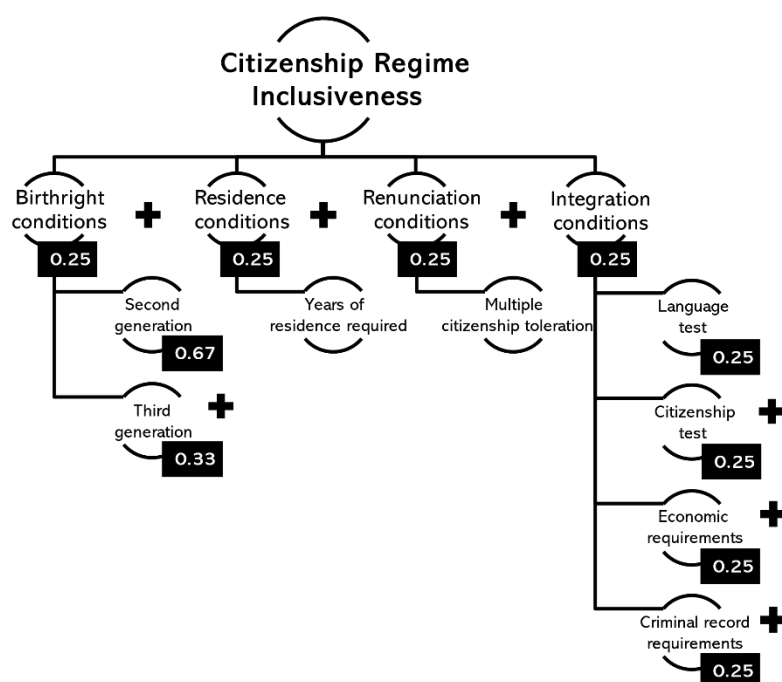
Source: Schmid (2021)

This classical approach has the advantage that it operates with indicators that capture specific aspects and therefore each indicator can be directly compared across space and time. This may seem obvious – but as we will see, this classical approach is not the only game in town. In addition, there is direct information about both relative and absolute levels of inclusiveness. And there is indirect information about policy changes and their magnitude.

The disadvantage of this classical approach is that we super-impose a concept across potentially diverse contexts. Thich is why internal validity in terms of dimensionality is so important (Schmid, 2021). Conceptual dimensions must be shown to exist also empirically in statistical terms, so that the theoretical super-imposition is valid. Another disadvantage of the classical approach is that, by defining fixed indicators and content, it assumes homogeneity or equivalence across space and time. This may be the main problem that this approach faces for "going global."

The second existing approach focuses on "policy changes" as the unit of analysis. In the field of migration and citizenship, this approach has been championed by the DEMIG database (de Haas et al., 2015). This approach allows us to consider any change. We can assess the direction of change in terms of restrictiveness, and we can code the magnitude of change with an ordinal scheme. This allows for a high applicability across space and time. But for this we of course still need a concept that tells us when we see what we are looking for. Another challenge is how to define and code the magnitude of changes, which poses potential issues for validity and reliability. The disadvantage is that here we have no information about relative or absolute levels of restrictiveness. Also, if we do not code content, for instance if a change is about residence or about integration conditions, we cannot compare more specific changes across space and time.

The third approach is what I call the "flexible single indicator approach." This has been applied by Peters (2017) to build indicators for a broader immigration policy index. Figure 2

shows the single composite scale for citizenship policy. Lower values stand for a more difficult naturalization process. The maximum value stands for an easy process. These levels mix various aspects, for instance language testing, residence, and they also incorporate *jus soli*. The aim is to translate policy configurations directly into a composite quasi-numeric score. This approach allows us to consider any change and assess the direction and magnitude of change. We also have information about absolute and relative levels, and it is more applicable across contexts because it allows for cross-national equivalence of similar policy configurations.

Figure 2. A flexible single indicator for citizenship laws

CODING CRITERIA FOR THE CITIZENSHIP CATEGORY

Does the law mention citizenship? How easy is it to obtain citizenship? What determines citizenship for children born in the country (*jus sanguinis, jus soli, double jus soli*)? Are there racial discriminations in citizenship? How easy is it for the government to denaturalize citizens? Racial discrimination in citizenship policies leads to a lower score.

1 Only by birth from a native father or mother.
2 Only by birth through native parent and/or grandparent.
3 Very difficult process to obtain citizenship (language requirements, difficult test) and/or many years to citizenship (more than ten years) and/or children receive citizenship through either parent or grandparent.
4 Moderately difficult process (relatively easy language requirements and/or an easy test) and/or moderate time to citizenship (more than five but fewer than ten years) and/or children born in state automatically get citizenship.
5 Fairly easy process (e.g., no language requirements) and short time to citizenship (five years or fewer) and children born in state automatically get citizenship.

Source: Peters (2017)

This is where the new hybrid approach comes in. It applies a three-level concept structure with fixed components on the second level and flexible indicators on the third level (see Figure 3). When going global, we should first reconsider the basic concept that we are measuring. Inclusiveness can be seen as a normative notion based on liberal democratic theory. This concept does not necessarily suggest that more inclusion is more democratic, which is an even more normative adjective. Yet, it is still anchored in Western thought. For the moment, let's simply say we apply the notion of inclusion in the sense that more inclusion means less restrictive citizenship laws.

Figure 3. The new hybrid approach

Concept Here: Immigration-centric	Citizenship Regime Inclusiveness			
Fixed components **Defined minima and maxima** **Cases without provisions?**	Birthright conditions **+**	Residence conditions **+**	Renunciation conditions **+**	Integration conditions
Each component **as a flexible indicator**	Generic and composite rather than fixed categories Incorporate minimum or maximum value for «no provision» Any change can be considered Direction and magnitude can be assessed Information about levels			
Recording policy changes	DEMIG methodology and data as a starting point			

Source: Original illustration.

On the second level of the concept, then, we can follow the "classical approach" and clearly identify the relevant constitutive policy components. This level therefore follows the classic approach to identify in advance our potential suspects. It is therefore less open-ended than a single flexible indicator for all dimensions. Instead, each of these components can then be used as a flexible single indicator to be operationalized further on the third level. On this third level we can define categories that are more generic and flexible than in the classical approach, following instead the approach by Peters (2017). This may allow us to identify potential functional equivalents such as informal rules, and other context-dependent or more contingent differences, but only as they apply to pre-defined policy components. With the generic coding scheme for each policy component, we can consider any relevant change, we can assess direction and magnitude of changes, and we have information about levels. DEMIG, a database that records changes also in access to citizenship, could be used as a starting point both in terms of data and measurement of magnitude of changes (de Haas et al., 2015).

As the concluding Table 1 shows, this hybrid approach holds the promise of combining all advantageous features of existing policy index approaches. Of course, however, it cannot do away with the fundamental challenges of index building: conceptualization, measurement, and aggregation (Munck and Verkuilen, 2002). Particularly, it cannot evade the special and hard challenges involved in the flexible indicator approach, namely the determination of starting points and the assignment of valid numerical values for each policy change. Also, the hybrid approach I outlined serves the purpose of comparing policy components and index values in terms of ordinal or quasi-numeric levels across space and time.

Table 1. Summary of advantageous features of index building approaches

	Classical	Policy change	Flexible	Hybrid
Three-level concept	X			X
Captures levels	X		X	X
Captures changes	X	X	X	X
Context-sensitivity		X	X	X

If the goal is to provide a global toolbox, then this hybrid approach is already one step further than the groundwork of identifying relevant policy components, nominal variation, and policy changes in the first place. The new GLOBALCIT approach presented by Vink (*this collection*) has laid some of this groundwork already. As the global version of CITRIX based on GLOBALCIT data shows (Vink, *this collection*), the classical approach has the potential to reach wide. But a hybrid approach may still be needed to accommodate more cases, especially as we go longitudinal. Whether it can successfully translate cross-systemic variation into valid scores on a single scale still needs to be tested. To do so, we will need to apply Adcock and Collier's (2001) strategy of moving from concept specification and operationalization to concrete data and back in an iterative way until we have a workable index.

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Global Comparison of Citizenship Laws: Promises and Pitfalls

Rainer Bauböck*

Imagine there were a reliable dataset comparing rules for acquisition and loss of citizenship in all countries around the world since the 1960s. It would involve a big effort to build it. GLOBALCIT is currently trying to do so by expanding its existing datasets on rules of acquisition and loss of citizenship in space and time and coding them freshly. Is this worth doing? What limitations need to be kept in mind and which pitfalls should be avoided when working with such data?

1. Promises: Why should we compare citizenship laws across countries and time?

The most basic reason why we need global comparison is that citizenship laws do not just determine who enjoys what kind of rights within a particular state. If citizenship were a purely internal status regulated by domestic law, it might still be interesting to compare what rights different countries attach to it and how they regulate access to it, but the status could also mean very different things in each country and explaining the laws governing it would require examining only domestic constitutional traditions and politics rather than also international legal and political dynamics.

However, by turning people into citizens, or excluding them from citizenship, states shape the status and opportunities of individuals in the international state system. Their citizenship determines which states have to readmit them or grant them diplomatic protection and consular assistance when they are abroad. More fundamentally, from a global perspective, citizenship is a filing system attributing individuals to states (Brubaker, 1989) and determining state responsibilities towards these persons vis-à-vis other states. Although it is a core element of state sovereignty that they can determine their citizens under their own national laws, there is thus also a growing body of international legal norms that aim to constrain state discretion in this respect, e.g. by committing states to avoid generating statelessness.

A second and related reason is that citizenship laws do not operate in isolation from each other but interact in important ways. The research field of citizenship and immigration in the social sciences as well as in normative political theory has been nearly exclusively preoccupied with the rights of immigrants in receiving states of the global North and their access to formal citizenship status. What this literature has largely ignored is that the foreign denizens of these countries are at the same time nationals of their countries of origin. Their rights and opportunities are thus co-determined by the laws of two states rather than one. This conclusion is even more obvious for dual citizenship, a status that comes about only through an interplay of rules for acquisition and loss of citizenship determined independently by two states.

Citizenship laws interact with each other not merely in determining the positions of individuals with links to several states but do so also at the macro level of policy making when the laws in one state are influenced by those adopted in another one. A longitudinal comparison of citizenship rules can reveal patterns of diffusion with policies originating in a specific national context becoming a model for lawmakers elsewhere. This is how ius sanguinis spread throughout continental Europe after 1800 through the Code Napoléon (Weil, 2001) and how ius soli became dominant in the Americas through the separate sources of English common

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law and the 1812 Spanish constitution of Cádiz (Acosta, 2018). At independence, most former African colonies initially adopted the birthright rules of their European colonizers (Manby, 2018). More recently, a "civic turn" in immigrant integration policies pioneered by the Netherlands in the early 2000s in reaction to fears about Islamist terrorism and "parallel societies" of Muslim immigrants triggered the introduction of language, civic knowledge and value tests in many Western European states (Goodman, 2014).

A second pattern of interactive law-making occurs when states do not imitate other countries' laws but put up resistance against them. When Turkey started accepting dual citizenship for its nationals in the 1990s, this move hardened attitudes against toleration of dual citizenship for third country nationals in the Netherlands, Germany and Austria. When Hungary offered dual citizenship to its co-ethnic "diaspora" in neighbouring countries in 2010, Slovakia reacted with a law that turned voluntary acquisition of a foreign nationality into a reason for automatic deprivation of the Slovak one (Bauböck, 2010a). Russia's handing out of passports in Abkhazia, South Ossetia, Transnistria and Eastern Ukraine has similarly chilled attitudes towards dual citizenship in Georgia, Ukraine and the Baltic states.

In short, we need international comparison across countries and time in order to analyse citizenship constellations (Bauböck, 2010b) that generate the statuses and rights of individuals with cross-border ties as well as to grasp the macro-level dynamics of norm-setting in international law, of policy diffusion across states linked by a shared history or geographical proximity, and of reactive law-making through which states aim to shield their citizenship regimes against policies adopted by other states. Often, such research will require contextual comparative analyses of small numbers of states. However, for analysing changing state practices and norms in the international system (e.g. with regard to gender equality, statelessness and multiple citizenship) we will need standardised global datasets.

2. Pitfalls: Perspectival and methodological biases in the comparison of citizenship laws

On the one hand, every comparison in the social sciences involves a loss of detail and contextual knowledge that some scholars will regard as essential for the purpose of interpretation. On the other hand, systematic comparison that controls for similarities and dissimilarities and selects cases and indicators well promises to contribute to explanatory theories. The divide between qualitative small-N research aiming at interpretation and quantitative large-N research aiming at explanation is also present in the field of citizenship studies. Occasionally, the two sides have engaged in methodology skirmishes, which all too often degenerate into turf wars over the control of academic departments and associations. More often, they have just ignored each other, robbing themselves thereby of critical feedback on their respective limits and biases.

I want to reflect here briefly on five traps and biases that loom in the international comparison of citizenship regimes. In my view, none of these critiques justifies abandoning the endeavour to build global datasets and engage in large-N comparisons, since each of these pitfalls can be avoided when one remains alert and looks out for them.

The first of these is known as "methodological nationalism" (Wimmer & Glick Schiller, 2002). It consists in regarding citizenship laws only from the internal perspective of nation-states, which are thereby treated as closed containers. As I have already explained above, this entails a deficient understanding of the operation and dynamics of citizenship in the international state system. Because acquisition and loss of citizenship is regulated by national laws, we need to start from collecting, interpreting and coding these laws so that we can compare

them systematically. The trap of methodological nationalism does not lie in doing so, but in interpreting the results in a manner that ignores how national citizenship laws respond to international migration, to border disputes with neighbouring states, to policy innovations introduced in other states or to normative developments in international law.

The second and closely related trap is that of "holism" in studying citizenship regimes. It consists in an implicit assumption that the rules for acquisition and loss of citizenship status hang together to form a coherent whole that can be understood as a "national model". The task of comparative analysis is to work out the differences between such national models and to explain their genealogy, which is mostly associated with a history of nation-building and is assumed to persist over time through institutional path-dependency. Rogers Brubaker's comparison of France and Germany (1992) pioneered the national model approach in citizenship studies, which has been widely criticised in recent decades (Joppke, 2007; Bertossi & Duyvendak, 2012). Holistic assumptions can also be reproduced subconsciously in large-N comparisons based on standardised indicators through methodological premises guiding their selection and aggregation. For example, the access to nationality strand of MIPEX (Huddleston & Solano, 2020) selects a number of indicators that all measure the inclusiveness of national citizenship laws for ordinary immigrants and aggregates these into a single country score. This is perfectly legitimate as long as users remain aware of what has to be left out in order to enable such country rankings. For example, preferential access to citizenship for spouses of citizens, for co-ethnic immigrants or extraterritorial "diasporas" remain excluded, even if these are the main pathways to citizenship in many countries. If we want to understand instead the shape of citizenship regimes, understood as the ensemble of rules for acquisition and loss of nationality, then we need a much more comprehensive typology of all modes of acquisition and loss that are recurrently used around the globe. When then analyzing patterns and trends in the evolution of these citizenship regimes across countries we have to abandon the idea that they are driven by a single purpose, such as selecting and integrating immigrants as members of the polity. The rules of citizenship laws are instead shaped by multiple purposes of public policy (Vink & Bauböck, 2013) and drivers of change include domestic as well as international forces.

A third problem in comparative studies of citizenship regimes is generalisation from limited samples that consist mostly of wealthy and democratic countries of immigration in the global North. In the past this was partly due to a lack of available data on countries in the global South, but the overwhelming focus on immigration and widespread ignorance of corresponding emigration contexts also has to do with public debates and available funding for research privileging domestic concerns and perspectives in countries with strong academic institutions. There is nothing wrong with studying how "Western democracies" have adapted their citizenship regimes to immigration from the global South, as long as one keeps in mind that this is a particular context and does not lose sight of how "Western citizenship" is embedded in an international state system and interacts with other states. Shifting the focus to the global South and collecting data about it will, on the one hand, challenge assumptions about citizenship that have been hidden or taken-for-granted in the global North. Consider the meaning of ius sanguinis and ius soli in states where large numbers of children are not registered at birth, or the meaning of naturalisation where it is an exceptional privilege granted by high-level executive authorities rather than an option for immigrants who can become citizens if they meet a certain set of conditions. Recent comparative studies of non-Western citizenship regimes in South America (Acosta, 2018), Africa (Manby, 2018) and East Asia (Chung, 2020) have provided genuinely new insights into the operation of citizenship that have yet to be digested by mainstream theories derived from research on the global North.

A fourth trap consists in confusing law in the books with law in action. This risk lurks everywhere but is especially dangerous when interpreting citizenship regimes of countries where the rule of law is weak. Unlike lawyers who are very conscious of the difference between legal norms and their implementation and effects, comparative social scientists often treat citizenship laws simply as data that indicate how open and inclusive a political regime is towards immigrants and diaspora populations. Instead, we need to be aware that comparing the rules contained in citizenship laws in principle only allows to test hypotheses about variation of legal norms across time and countries. This is an important research agenda in itself. Studying, for example, regional patterns and trends regarding explicit gender discrimination in ius sanguinis and naturalisation provisions is a relevant research question quite independently of how these rules are implemented. It is linked to a human rights agenda and can be addressed through collecting and coding legal rules in nationality laws on a global scale. Yet, especially with regard to rules where the discretion of authorities has been traditionally wide, such as ordinary naturalisation or citizenship deprivation, we need to know about implementation before we can say anything about how effective these rules really are. Comparing administrative implementation is, however, much more difficult than comparing legal rules, because the former can only be captured through internal administrative documents or even observation of individual cases. First steps have been made towards the goal of comparatively analysing naturalisation procedures in European countries (Huddleston & Falcke, 2020). But a global and longitudinal dataset on administrative implementation of citizenship rules remains beyond reach. In this respect, in-depth qualitative comparative studies of selected cases are the best we can hope for.

A final trap that I want to highlight is that of letting our research questions be driven by the available data. As mentioned above, in the 1990s and early 2000s the scarcity of standardised comparative data generated a Northern and immigration-centric bias in theories about the evolution of citizenship that often postulated a universal trend of liberal convergence. In the future, thanks to efforts by GLOBALCIT to build open access global datasets, we may face instead a problem of abundance. Once reliable global data are available, researchers will be tempted to ask (only) those questions that they believe these data can answer. In a global dataset the size and representativeness of country samples is no longer a statistical problem. Researchers may then start to look for patterns of correlation and interpret even weak ones as indicating some causal relation that calls for ad hoc explanatory hypotheses. We should never forget that the most important task of social science is not to chase the holy grail of causal relations between variables but to build coherent and evidence-based theories that help societies to better understand the social and political institutions that they themselves have created. This applies also to the institution of citizenship and for that endeavour we need to keep large-scale comparisons open for big ideas even if these cannot yet be tested.

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Without the South, It's Not Global: Creating Knowledge about Naturalization Jointly

Luicy Pedroza* & Pau Palop-García**

In 2019, we wrote a research note for the APSA Newsletter on Migration and Citizenship titled "How do we move migration policy datasets and indices further? A proposal to address persisting lacunae and major research imperatives". In that piece, we made proposals on how to increase the geographic and temporal coverage, as well as the level of specificity and detail of migration policy indices. We also argued that we should amplify the scope of our measurements to incorporate dimensions of migration policy other than immigration policies. The goal of that piece was to make a non-exhaustive stocktaking exercise, yet enough to make the point that a more rigorous knowledge expansion requires reassessing our goals and redirecting our efforts to cover areas that are still under-researched. A further important point that we made is the need to conduct our forthcoming research according to common standards of transparency and access to data.

In our contribution to this symposium, we want to pick up where we left in that research note and go a step further by proposing clear pathways to solve some persisting blind spots and biases that our policy measurements have – in this case especially regarding naturalization.

1. Addressing three remaining blind spots in migration policy indices

1.1. The focus on the global North

One of the clearest weaknesses of our measurements is their focus on the Global North. Although some important efforts have been deployed to tackle this issue (GLOBALCIT being the clearest example), Asia, Africa and Latin America remain under-researched. We suspect that this bias has to do with data availability. For these regions, we still lack reliable data that can be cross-checked and cross validated with *other* readily available datasets. Another reason why we have focused on Western countries might be the easier access to primary sources, with the background of a stronger rule of law: easily accessible systems that order legal and policy primary sources and make them public.

> Our proposal: There is no easy fix for this, but with proper investments and planning, much can be improved. The geographic concentration on the Global North keeps reproducing because the investments in better data and reliable experts are kept in already wealthy regions. We should promote and expand our networks to other regions so that we can empower scholars working in those regions.

A factor that plays a role in keeping most of the datasets and indices geographically concentrated is less obvious than data availability: our research questions. We tend to try to bend the rest of the world to fit the measurements developed for the questions that have been made in the West. The kind of questions we ask, the frames we use for our research puzzles and how we divide the world into *relevant cases* and *irrelevant cases* all play a role in continuing biases. We have argued elsewhere against the simplistic differentiation between "countries of immigration" and "countries of emigration" for research design purposes because, as much as

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this differentiation resonates, it can be misleading. We think that there is much to be gained from developing a more accurate sense of the range of variation of migration policies first (in this case, of naturalization regulations all over the world), and make our research questions more sensitive to the variations observed.

> Our proposal: A way to become sensitive to this bias (and to raise our sensibility for the original interests and new potential questions that researchers in other regions could have on citizenship and nationality issues) is to work *together* with scholars from those regions. In a small scale, we can achieve this by entering common research projects and particularly by aiming to publish together with authors from other regions. Institutionally, we need our long-term funding schemes to move towards promoting sustainable cross-regional academic cooperation.

1.2. The level of analysis

A second blind spot in migration and citizenship policy measurements is caused by a top-down abstraction process. Sometimes we work with categories that are perfectly plausible as theoretical and analytical constructs but that have no correlate in reality. Reality would require us to become much more specific in our definitions. In the APSA Newsletter piece we exemplified this with categories such as "high-skilled" migrants (which in reality might refer to specific groups or professions) or "humanitarian migration" (which in reality tend to boil down to the existence of a specific regulation for refuge or asylum, but do not exhaust humanitarian categories).

> Our proposal: we need to stop portraying policies as general and unitary when they are not. We should start adjusting the level of analysis towards more specificity. This point is relevant for the *implementation* of naturalization, for instance. We could experiment with bottom-up approaches that focus on lower levels first instead of imposing categories that emanate from migration policies of the Global North. That is, we propose to collect data on the categories that exist and, later, see if they add up analytically or not (i.e., if they require creating a different category), to allow for comparisons across countries and regions.

1.3. The impact of new technologies on citizenship

A third blind spot that we want to mention relates to the digitalization processes happening around migration and citizenship policies. Social credit systems based on big data, e-citizenship, matching algorithms to select naturalization candidates or cloud communities are examples of how new technologies might play a key role on the attribution and governance of citizenship in the next decades. Our current indices do not capture these new realities.

> Our proposal: We need to start reflecting how we can measure the impact of new technologies on migration and citizenship policies through new indicators or even completely new dimensions for our current concepts. Studying countries that are early adopters of these technologies would be a first step.

2. Seeing through the prism of emigrant policies: different degrees and qualities of citizenship

When analyzing the kinds of citizenship that are available to the naturalized there is much to be gained from considering the emigrant side of migration policy. Studies on Latin America and the Caribbean have given us some important lessons:

The rights of dual nationals can be quite different from the rights of mono-nationals and of nationals by origin, which suggests that many countries still attribute to immigrants the very fears that they are supposed to have overcome for their own nationals (see Hoyo, 2015). What we have observed is that states restrict key rights of citizenship such as protection abroad and return for those who naturalized. While this may appear insignificant because of the relatively few numbers of persons who naturalize and move abroad or acquire yet another nationality, it illustrates gradations of cross-national membership and qualifications to the ideal of equal citizenship. Having clarity about these differentiations is important because they point to (other) multiple purposes of citizenship laws and regulations. The regulations across Latin America and the Caribbean to dampen, condition or delay the exercise of some citizen rights by naturalized citizens reflect a skepticism that the links to the community of membership, despite having complied with a standard process, will ever amount to the same kind of membership of nationals by origin. Although our studies of these differentiations in other regions are incipient, some evidence from East Asian cases (Pedroza, Palop-García & Chang, 2022a; 2022b) suggests that this is not an exclusive practice of Latin American and Caribbean states.

We should not overlook that some states distinguish between 'nationality' and 'citizenship'. While the term nationality is used to refer to the condition and privileges derived from having a certain passport (e.g. the right to return to a state, diplomatic protection of that state abroad), citizenship is used to capture the condition to exercise a full set of rights and duties (e.g. especially political rights) between a state and individuals (Pedroza & Palop-García, 2017: 589). This legal distinction enables several of the above-mentioned gradations: differentiations between immigrants and emigrants, between those who are nationals exclusively or dual/multiple- nationals, and between those nationals by origin and nationals by naturalization. Scholars in Europe have deemed this differentiation unworthy of attention because it plays no role in European law traditions. Again, we have found this differentiation has relevance in other regions beyond Latin America --in Asia different residence regulations (right of abode, household registration) serve to differentiate one from the other.

Thanks to these lessons learned we have added in our analyses five new indicators to those that GLOBALCIT has for naturalization:

(1) Distinction between citizenship and nationality,

(2) Emigrant dual nationality for immigrants who naturalized,

(3) Restrictions on citizenship for naturalized immigrants,

(4) Loss or suspension of citizenship for immigrants who naturalized and take residence abroad, and

(5) Restrictions on citizenship for naturalized immigrants who are dual nationals.

3. Making more sustainable investments to expand datasets globally

We need more investments to support a global expansion of datasets and a further refinement of our measurements so that our indices reflect the breadth of naturalization practices across regions and countries.

Our main proposal here is to include the voices of scholars from the global South in this process. Our scholarly community has relied a lot on two approaches: a) find some experts

from abroad and have them fill out our questionnaires or b) train ourselves in their laws and collect information "from here". These strategies are fine and valid as a starting point, but we can aim for more, not only because it is sometimes difficult to find an expert to answer our questionnaires, but also because of the effects that we are producing and, at the same time, other effects we are not producing enough. With vastly better resources, projects directed from the global North often engage scholars in the South in parts of the data collection – sometimes even distracting them from their main tasks. Yet those scholars still rarely appear as authors of the top-level publications produced with the data they helped collect. Even if it is true that such participation still counts, tends to be remunerated, and gives them exposure, this is not always acknowledged and duly quoted. We see a great potential in developing a culture of jointly created and shared knowledge whereby scholars from the North train scholars from the South in their regions, but also take a chance to learn from the latter and to hear their research questions and interests. This not only makes it more likely that scholars from the South will be included in top publications, but also enlarges our community of scholarship to other regions, which potentially has a multiplier effect for the research produced by this scholarly community.

A first step in this direction can be taken through training workshops (not only dissemination workshops) with legal scholars, political scientists, and historians from/in these regions. This proposal has an element of internationalization of knowledge production. In a post-pandemic world, these trainings and workshops can and should keep taking place in Europe, but hopefully can also take place in other regions, and have a hybrid and mixed format with some remote components and some components of intense and joint learning in person. While no online workshop or training so far allows the kind of in-depth exchanges that live workshops allow, it is obvious that including some online modules expands the potential to socialize knowledge and training and makes it more accessible financially and more environmentally sensible.

Nourishing this kind of scholarship is a long-term endeavor, but one that could pay off for everyone. It could widen our circle of readers and interlocutors, increasing the potential impact of our research beyond data collection because it will be potentially understood and used by more people and towards more purposes. It will make collaborations and co-authorships across hemispheres more likely. Over time, it will also enhance cross-national comparability as perhaps the intense North-South dialogues will lead to some convergence over common indicators, measurements, and goals thereof, and it will enrich our research landscape with fascinating new questions.

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Avoiding Measure for a Measure's Sake: Limits and Value Added of Citizenship Law Indicators

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Citizenship is commonly defined as a relationship between an individual and the state. At its heart, the notion of citizenship has a legal component (nationality in international law), but also the related political dimension composed of the rights, duties and actions of citizenship, as well as the ascriptive or identitarian one. The interdisciplinary field of citizenship studies has evolved to unpack and examine each of these dimensions through different epistemological and methodological lenses (Bauböck, 2013; Isin & Turner, 2002; Joppke, 2007). While recognizing the variety of meanings that the notion of 'citizenship' has across the disciplines of social science – including legal scholarship, sociology, economics, anthropology and demography – comparative scholarship on citizenship and immigration has focused on measuring policy variation in the domains of nationality acquisition and loss.

These measurements have taken place through the development of at least nine policy indices that seek to systematically capture and compare the attribution of citizenship by birthright and naturalization (Howard, 2009; Janoski, 2010; Koopmans et al., 2012; Koopmans & Michalowski, 2017; Huddleston et al., 2015; Solano & Huddleston, 2020; Jeffers et al., 2017; Graeber, 2020; Schmid, 2021). All of these indices cover the European Union countries, and all but Howard (2009) and Graeber (2020), include other European states. North American countries, Asia and Oceania are included in five of these indices, while some of the states in South America are covered only in GLOBALCIT's 2017 CITLAW indicators and Koopmans and Michalowski's 2017 version of ICRI, the latter being the only indicator that includes African countries. In other words, most of these indicators have been developed to study immigrant integration in the Global North rather than the overall direction of citizenship policies. This can also be seen in the coverage of the different elements of citizenship policies included in the respective indicators. All of them measure the degree of 'inclusiveness' or 'exclusiveness' of birthright citizenship through ius soli and ius sanguinis, and what is broadly understood as 'residence-based naturalisation'. Howard (2009), Janoski (2010), Huddleston et al. (2015), Jeffers et al. (2017) and Graeber (2020) also include systematic information on specific modes of citizenship acquisition, including those based on marriage, or international human rights norms.

Even though these indicators have certainly systematized our knowledge on the regulation of membership, each of them has its shortcomings. Some of these have been noted in the scholarship on citizenship, but also acknowledged in the codebooks explaining in which ways the systematization of legal provisions and their translation into measurements has been done. Even so, there are two key problematic aspects of measuring citizenship policies, which scholarship has insufficiently addressed so far. The first one is something I would call 'conceptual imposition', or the presumption that terms and concepts that have been developed to study and measure policies in Western democratic states will have the same meaning across the world. The second is the vision of citizenship policies as qubits, or binaries, which prevents scholarship from identifying where legal provisions are used to promote specific and often conflicting interests, such as those of expatriate and immigrant populations. In other words, none of the indices so far adequately capture and enable scholars to study the complexities and contestations that lie in the very heart of citizenship policies. In what follows, I explain why, and finally argue that developing a new citizenship index would make a distinct intellectual and

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scholarly contribution only if it sufficiently addresses the issues of conceptual imposition and binarization. Developing a measure for measure's sake makes little value-added to the current state-of-the-art.

1. Conceptual imposition: the need to recognise the observer effect in social science

The French Revolution was a turning point for what we understand to be the substance of citizenship (Brubaker, 1992). It brought about the *Declaration of the Rights of Man and the Citizen*, the basic charter of human rights, based on the freedom and equality of all men. It solidified the conception of citizenship around the idea of an equitable distribution of socio-political entitlements and obligations. Furthermore, the French citizenship model based on territorial rather than blood connections, became most widely associated with the *ius soli* principle for citizenship attribution.

Yet, the 1789 Revolution introduced another radical change, one that we frequently overlook in the social sciences. It brought about the standardized units of measurement of length and weight. Previously, each French region had used different measures, which made trade and commerce between the different regions of France quite difficult. So, in August 1793, the National Convention adopted a decree bill that imposed the 'metric system' in France. The bill was enacted in April 1795, and by that time the 'mètre étalon' was installed around the main marketplaces in Paris. These units of measurement spread around Europe during Napoleon's conquests and in 1875 the Treaty of the Metre afforded international recognition to the predecessor of what is known today as 'the metric system'.

This interesting anecdote aside, it is beyond doubt that measuring length and weight in a standardized way has made all our lives far simpler; it also aided progress in science, establishing units that colleagues around the world can use to compare lengths, distances, temperatures or weight. Nonetheless, we should not forget two things. One, the system was spread through imperial conquest in the first place. Two, we need to wonder whether we can measure 'things' in the social world in the same ways in which we measure those in the physical one. To discuss this, I go back to the notion of 'conceptual imposition'.

As social scientists, we often develop 'new' concepts, and even more so take pride in doing that – as I did just now. We develop them from our own perspective, based on the facts, events or dynamics that we can observe. We use them to study social relationships in our own context, and compare these relationships with those in other corners of the world, using our own units of observation. In so doing hardly ever do we question whether the concepts we use, and the tools we deploy to compare societies, are adequate for understanding dynamics and interactions that are conflicting and incompatible with or contested beyond what we have based our original observation upon. Is the substance of the notions of 'citizenship', 'equality', and 'democracy' the same in Brazil, China, Italy, Jordan, North Korea, Sierra Leone, Singapore? Is it the same across scientific disciplines or social/economic classes; across culturally and historically distinct communities?

The 'observation effect' in physics posits that some systems may be altered or disturbed by the act of observation and that measurements may have lasting effects on those systems. By analogy, recognising that we need to account for our own viewpoint and bias when constructing measurements of social realities would perhaps also change the way in which we think about indices and what they are used to measure, compare and study. This can be illustrated with an example of a binary citizenship index. Let us imagine that an index measures whether it is

possible (or not) to acquire citizenship (i.e., the legal status of nationality under international law) on the basis of marriage to a citizen of a given country. This index can take different forms – it can measure only what is considered 'marriage' under national law (commonly a legally recognised monogamous union between a man and a woman); it can include unions recognised as equivalent to marriage, such as civil partnerships (commonly a legally recognised monogamous union between the same or different genders); it can perhaps also account for plural or temporary marriage, accepted in some cultures. In each of these cases, and perhaps in those unaccounted for here, the results of observation will differ, and in some – they may have normative implications (e.g., if a cultural norm is viewed negatively due to our observation standards).

Avoiding this 'conceptual imposition' and the 'observer effect' that results from it is impossible. It does not, however, mean that we should stop studying, measuring and comparing the workings of our societies; after all – a meter and a foot both measure length. It means that we need to acknowledge the drawbacks of and biases in our research from the very moment we conceive of it.

2. Citizenship qubits: limitations of binary approaches

So far, most of the citizenship indices have classified countries by viewing their citizenship policies either as single or bi-dimensional units. They would aggregate different elements of citizenship laws and look at whether the overall policy is 'inclusive' or 'exclusive', or whether naturalization seeks to foster admission of immigrants or to shun them away. The core weakness of such binary approaches is that – while they do offer some broad insights in the direction of policy – they frequently overlook the main character of citizenship legislation, and its purposes and outcomes along different dimensions. For example, measuring whether a law is 'inclusive' by – for instance – looking at the different naturalization conditions (e.g., years of residence, language, income, character, etc.) may be misleading if a country has a rather open citizenship policy, but substantive hurdles in the immigration law regulating the entry and stay of foreigners. It could equally be misleading if naturalisation of foreigners (or even expatriate populations) is reasonably straightforward, while indigenous populations or minority groups are unrecognised or excluded from citizenry.

One way of overcoming this binary approach to 'measuring' the policy direction of citizenship legislation would be a multi-dimensional model. In this vein, the empirical study of citizenship policies in the EU and its neighbourhood by Vink and Bauböck (2013) is a two-dimensional model based on aggregate policy indicators. This model posits 'four idealtypic citizenship regimes' on the basis of the purpose of citizenship laws (Vink & Bauböck, 2013: 628). It divides them into: 1) ethnoculturally selective; 2) ethnoculturally expansive; 3) territorially selective and 4) territorially expansive. While this model certainly resolves some of issues of the citizenship qubit by looking at different types of selection and inclusion, it is still rooted in the traditional ethno-territorial conception of citizenship and assesses the overall policy direction. A further step forward would be a more stratified approach, which would better account for those aspects of citizenship policies – such as merit, contribution, or humanitarian grounds – whose purpose goes beyond ethnic or territorial principles. The key challenge for empiricists would be finding the right tools to apply it across the board.

3. A lookout: avenues for value-added measurements

Systematic studies of citizenship regulation are of key significance not only for immigrant integration across the world, but also for understanding the very essence of membership. Immigrants account for merely four per cent of the global population (IOM, 2020), and mostly consist of refugees in the Global South. Even so, the study of their integration has predominantly concerned the scholarship on Western democratic states, thus often overlooking socio-political realities of membership beyond Europe and Northern America. As a result, to have real value added, any new index systematically comparing citizenship policies, would need to adequately address the realities of immigration in Africa, Asia, Latin America and the Caribbean, and in Oceania, rather than adding a range of countries from these regions to a model designed to study immigrant integration through citizenship in the Global North. In other words, everyone in the world is affected by the regulation of nationality in the territory where they are located. Therefore, a new index could provide a true intellectual contribution only if designed to address the real challenges of regulating membership in the contemporary world.

One way to do this, could possibly be to look at the implementation of different aspects of citizenship policies and how they impact on who is recognised as a citizen. A step in this direction has been made at GLOBALCIT with the *Global Birthright Indicators* (2019), which look at the regulation of ius soli and ius sanguinis worldwide. While offering an excellent comparison of the regulation of transmission of citizenship at birth, GLOBALCIT's indicators unfortunately do not capture implementation. Issues surrounding birth registration have frequently been the cause of statelessness or undetermined status across African states (Manby, 2018) as well as in the MENA region (Fischer, 2015; van Waas, 2014).

Implementation has, however, been granted substantial attention in the study of naturalisation requirements (again, mostly in the Western democratic states). MIPEX (Solano & Huddleston, 2020) and CITIMP (Huddleston, 2013) have placed a substantial emphasis on the different procedural requirements for naturalization, including conditions related to residence, language knowledge, steps of the procedure. Stadlmair (2018) zoomed in on the effects economic conditions for naturalisation, in particular; Goodman (2011), and, more recently, Jensen et al. (2019) discussed how language requirements may impact on naturalisation rates. These studies have shown the significance of the different administrative and procedural requirements in the process of citizenship acquisition. Even though they offer a substantive contribution to our understanding of naturalisation, their application is limited to well-regulated administrative systems. Again, such approaches exclude from systematic comparison those countries where naturalisation is highly discretionary. The key challenge, and possibly an almost insurmountable one, would be to devise systems for measuring the degree of discretion and its effect on naturalisation.

A further avenue where a groundbreaking contribution to scholarship on citizenship could be made is a methodical approach to the loss of citizenship. In recent years, indices of statelessness (ISI, 2020) have become well established in both the academic literature and the policy world. However, formulae for comparing the various aspects of citizenship loss, denaturalization (loss of citizenship acquired by naturalisation) and denationalization (loss of citizenship attributed at birth) have received far less scholarly attention. This is rather surprising given the incredible variety of modes of citizenship loss (GLOBALCIT, 2017), and procedures through which they are implemented. It comes as an even greater surprise given the salience of the issue in the context in which human rights concerns clearly collide with issues such as the fight against terrorism (e.g., Shamima Begum case in the UK; Ghoumid and others in France), result from territorial rescaling (e.g., UK's exit from the EU; dismantlement of post-communist federations)

or a state's overall approach to citizenship (e.g., ex lege loss upon voluntary naturalisation; loss due to long-term residence abroad).

In sum, developing ways to compare citizenship policies is by no means an easy task; and doing so just for the sake of the measure makes scarcely any contribution to what scholars have achieved so far. Perhaps scholars will never be able to develop a model fine-grained enough to capture all the idiosyncrasies of all the citizenship laws in all the world. Yet, should they be bold enough to go in this direction, their approach would need to be a) stratified – thus accounting for the various layers of citizenship; b) internally and externally consistent – to ensure broad applicability and avoid 'conceptual imposition'; and c) honest – in that it will highlight its potential and equally recognise its limitations.

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Concepts in New Contexts

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The development and use of concepts in social and political sciences is a key aspect to both theory and inferences (Gerring, 1999). Concepts provide researchers with a framework for what social, political, and economic phenomena are 'out there'. They are both a language for communicating *what* we are trying to explain and part of the frameworks we use to explain *it* (Berenskoetter, 2017). In other words, concepts are analytical categories as well as the tools scholars use to build theories.

As part of the production of knowledge in academia, there is a strong demand for cross-country comparative research. One temptation in this regard is to use and test the same concepts in other contexts. The goal of this cross-contextual comparison is to test conceptual theories to see how they might play out in different settings. When broadening the scope of the research on naturalisation and citizenship from the 'usual suspects' in Europe, North America, and Oceania one common example of this is the binary of 'inclusion/exclusion' of the laws and policies governing citizenship acquisition and loss. However, one must keep in mind that how researchers describe, and label experiences will inevitably reveal biases in their research; and therefore, there is a concern for the acontextual application of euro-centric membership concepts when attempting to explain them across new contexts. With this short reflection, I consider: i) how to assess the value of a concept in a new context (historical, theoretical, or political); ii) how to improve its structure; and, iii) how to develop conceptual alternatives.

1. Applicability

Concepts are often developed by observing a phenomenon at a contextual moment. Shifting research to a new context (historical, theoretical, or political) may change both the meaning and scope of a particular concept. It is therefore important to ask whether a concept can apply to a new contextual site. As different aspects of the context change so will the applicability of the concept. An old but poignant example is with the study of the concept of the 'family' where researchers have had a euro-centric bias towards an individualistic orientation. This would be, for instance, using the 'nuclear family' as a universal concept which in much of the world, would miss the bigger picture. For example, Getrude Dadirai Gwenzi has recently shown how the meaning of 'family' in Zimbabwe is constructed and defined by care leavers – finding a more complex set of social relationships (Gwenzi, 2020). John Gerring (1999) defines four criteria for conceptualisation in comparative research: the term, its attributes, its indicators, and its phenomenon. When the number of cases is expanded, researchers should consider all four aspects of the concept and how it then might need to be adjusted. Thus, scholars should maintain flexibility and be open to expanding a concept definition as they broaden the scope of their research.

One intriguing example in the comparative study of citizenship research is with the concept of 'naturalisation'. Liav Orgad (2017) describes three functions to the concept of 'naturalisation': i) a contract between the state and its prospective citizen; ii) as a political test for entry into the bounded community; and, iii) as part of the process of nation-building. But the practice of naturalising newcomers is not limited to the liberal democracies of Europe and thus, employing this functional definition in non-European contexts may misinterpret reality. As Bronwen Manby (2021) has recently shown in the context of some of the states in Africa, naturalisation has an additional function of being "performative" – meaning that its restrictive nature acts as a

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signal "that the non-African minorities privileged during colonial rule will not be allowed to continue to dominate the political economy". Or furthermore, looking to Noora Lori's research in the Gulf States, naturalisation is seen by the state as a mechanism for ensuring national security (Loori, 2019). In the work on investor citizenship in small island states another function could be to support the economy and means of production (Van Fossen, 2007; 2017). Thus looking at the concept of naturalisation solely through the prism of liberal democracies would limit its explanatory power. As these examples have shown, rather than thinking about how a concept works in a new context, a better approach is to explore how a new context changes the meaning of a concept. That is to say, scholars should make room to allow the new context to challenge their conceptual assumptions rather than letting their 'conceptual glasses' fog what they discover in new contexts.

2. Interpretation

The second challenge to studying concepts in new contexts is the depth of local knowledge that is required to both label the concept and precisely measure the phenomenon in question. This becomes increasingly difficult when comparative research involves a large N sample as researchers may have asymmetric knowledge about their cases. One possible result is 'conceptual confusion' i.e., that researchers will label different phenomena with the same name (Sartori, 1970). This issue is especially acute in the study of naturalisation and citizenship; researchers should thus, be aware of two aspects of 'interpretation' in their empirical use of concepts across different contexts.

The first aspect of this is knowledge of the language of the membership community in which research is being conducted as differences in language can have empirical differences in results (Koselleck, 2004). Gerring (1999: 362) points out that "semantic complications multiply when a concept's meaning is considered historically, in different languages, in different language regions of the same language, in different grammatical forms…, and in different speech acts." Therefore, using digital translation services to look at laws and policies may shape the findings of the study. It is further complicated in multi-lingual communities where the governing language may be different from indigenous/local languages. Even within one state a concept can have many meanings for different groups and can change over time.

The second aspect is that researchers' own 'positionality' may affect their empirical application of a concept (Manohar et al., 2017). As Edward Said wrote back in 1978, "no one has ever devised a method for detaching the scholar from the circumstances of life, from the fact of his involvement (conscious or unconscious) with a class, a set of beliefs, a social position, or from the mere activity of being a member of society" (Said, 1978: 10). In other words, 'who one is' will shape 'how one interprets' and consequently, the proceeding explanations. Positionality can be made up with aspects of the researcher that are fixed (race or ethnicity) whereas others can be subjective (personal lived experiences).

This is to say that scholars must not only keep in mind that their own research training and methodological strategies will shape results but also how their positionality in research may influence the questions they ask, concepts they use, and interpretations. While this kind of reflection seems to be taking place in other disciplines (specifically with post-colonial feminist theorists), there is little in the case of citizenship studies. Citizenship itself is an essentially contested concept with multiple meanings across scholarship. It also cannot be decoupled from its colonial history. Therefore, those themselves with a 'first class' passport may be biased in how they view and employ the concept from the very beginning. This needs to be both acknowledged and discussed.

3. A local viewpoint

The question of 'interpretation' inevitably leads to what can be seen as a recommendation but comes with its own set of challenges. Researchers in Europe and North America will face difficulties in their academic pursuits unless local scholars are included at every stage of their research design. This expert knowledge for the concept under inquiry is the most important aspect of a comparative conceptual study. Local scholars will have the best lenses to describe and understand the related social, political, and economic phenomena. As Giovanni Sartori's guiding phrase suggests: 'meaning before measurement' (Sartori, 1970) which will help decide if and how a particular concept can be applied and avoid conceptual confusion in interpretation.

On a logistical level, this means actively dissolving the barriers and burdens imposed on researchers and practitioners from the global South. Digitalisation and online conferences have facilitated this to an extent. This is because discussion and debate can move onto digital spaces instead of in-person. In-person conferences may require researchers to bare the burdens of travel costs or to go through expensive and bureaucratically onerous visa applications. But it also means using and citing research from local scholars. This may seem obvious however, it is not always something that is facilitated by university libraries which may only have licenses to particular types of journals where scholars from the global South are underrepresented.[13]

Conclusion

Much of the current research on naturalisation and citizenship uses euro-centric lenses, concepts, and methods and expands them broadly to other contexts. While the goal of a concept is to establish equivalence across contexts, this practice will only lead researchers to present an opaque picture of the specific contextual reality. With this reflection, I have presented several challenges to using concepts across contexts namely, i) considering the applicability of a concept by not assuming universalism; ii) keeping in mind one's own 'glasses of interpretation'; and iii) that local scholars will have the best knowledge of cases however, inclusion requires researchers to take an active role in breaking down barriers. Considering these issues will hopefully allow researchers interested in comparative research to open doors for formulating concepts that are contextually aware.

Research is a mode of scientific production and "any comparison is a construction in the sense that it discerns which elements or segments of social reality are to be related to one another and along what dimensions" (Azarian, 2011: 123). It is important to keep in mind how knowledge is produced. How concepts are used in research will give meaning to empirical phenomena and can thus be a mechanism for exercising or reproducing existing power dynamics.

All that being said, there is much to gain by expanding the scope of research on citizenship and naturalisation. However, if conducted with the assumption of universalism and without acknowledging how one's own position might influence findings there will be practical implications like compounding academic inequalities and reproducing 'blindspots'.[14]

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13 'Global South scholars are missing from European and US journals. What can be done about it,' The Conversation 29 July 2018. https://theconversation.com/global-south-scholars-are-missing-from-european-and-us-journals-what-can-be-done-about-it-99570.

14 See Luicy Pedroza's intervention in the workshop for this symposium: https://www.youtube.com/watch?v=OkKZY1XD9aU.

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