

## Chapter 2

# (Dual) Citizenship and National Identity in a Globalised World: Sociological Perspectives

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### Abstract

This paper starts from the concept of identity to develop some hypotheses about the attitudes of people toward national identity and citizenship. It is proposed that there are two factors which determine these attitudes: an evaluative-normative component related to the symbolic value of citizenship and a strategic orientation which considers the advantages connected with a particular passport. Empirical findings from the *International Social Survey Program (ISSP) on National Identity and Citizenship* are presented. It is shown that citizenship is a very important component of national identity in the eyes of the public and migrants usually exhibit a dual identity toward their countries of origin and destination. The surprisingly low naturalisation rates among immigrants in Western societies are also explained by two general factors: people do not want to lose their original national attachments; however, they also consider the instrumental advantages from acquiring the citizenship of the new country. Two further issues are discussed: the need for well-functioning democracies to have active citizens and the obligations connected with citizenship – of which these three are the most relevant: taking part in voting, paying taxes and, for men, performing military service. In the concluding section, the chapter points to the need to facilitate naturalisation, extend options of dual citizenship and improve the situation of denizens. Citizenship is a topic investigated mainly by scholars of public law and political scientists (Bauböck 1994; Hammar 1990; Spiro 2016). A number of sociologists have also contributed to this discussion (Brubaker 1992, 2010; Joppke 2010; Soysal 1994). In fact, sociology can contribute not only to the social aspects of citizenship but also to the discussion of the emergence and social impact of legal principles. At least since the writings of the Austrian legal scholar Eugen Ehrlich (1862–1922), we know that the legal reality of a community cannot be captured by looking only at formal written law because it also includes local and regional norms and customs and has a cultural and political character (Cotterell 1992; Ehrlich 1989 [1913]; Rehbinder 2014). In this chapter, I discuss three issues: first, the relevance of citizenship for personal, social and political identity in the modern world; second, some empirical data on the relevance and meaning of citizenship, as people in about 40 countries from all continents see it; and, third, three additional aspects of citizenship relevant from a sociological perspective. In the conclusions, the findings are summarised and some

normative conclusions drawn concerning the policies of naturalisation and the issue of dual citizenship.

## 1. Citizenship, national and other identities

In order to understand the relevance of citizenship for people from a sociological perspective, the concept of identity is a useful starting point. Identity is a term which was only introduced in psychology and the social sciences in the second half of the twentieth century but which has gained widespread acceptance since then.

### 1.1 The concept of identity

Among the pioneers of the concept was the German-American psychoanalyst Erik H. Erikson (1902–1994). In one of his first books, *Childhood and Society* (1950) he developed the basic concept of identity, its development over the life course and its societal determinants. A sociological precursor of modern identity theory was the German sociologist Georg Simmel (1858–1918) who was also a Jew and was only appointed late in life as a university professor. In his 2013[1908] essay about the “criss-crossing of social circles”, Simmel argued that a central characteristic of modern men is the fact that they belong to many different social circles which – in contrast to the concentric circles in traditional societies – only overlap partly. Since most of these circles are selected freely and each person exhibits a unique configuration of social roles, men and women become more distinct personalities and have more freedom to pursue specific lines of activity in different spheres of life. A third early founder of modern identity theory was the American George H. Mead (1863–1931). Influenced by pragmatist philosophers, he proposed that every human develops an identity through close interaction with others by taking over their roles, their use of symbols and, most importantly, their language. The formation of identity is an ongoing process, continuing into adulthood through interaction with others and the social and cultural context in which a person lives (Mead 1967[1934]).

Building on the insights of these pioneers and on contemporary identity literature (Abels 2006; Fukuyama 2018; Haller 2003, 569–572; Stets and Burke 2000; Tajfel 1978; Taylor 1989; Weigert, Teitge and Teitge 1986), the basic assumptions of identity theory can be summarised in five points:

- Identity is a more or less comprehensive and coherent self-image which determines our thinking and actions. This image includes knowledge, assumptions and beliefs about oneself, about others and about society and the world. A person with a clear identity feels more secure and self-conscious and will be better able to make important and timely decisions.
- A distinction has to be made between personal identity and social identity. The first includes all those “internal” aspects of identity which only the individual personally

knows and may not disclose to others; social identity or “self” includes the obligations that a person has in different social sectors and institutions (family life, place of residence, work roles etc.) and the attributions which they experience from others, especially from those in their reference groups. Most important are those reference persons and groups with which someone is the most in contact and those personal roles in which he or she has the most autonomy of decision.

- Identity also includes emotional and evaluative-normative elements. Strong basic social emotions, such as pride and shame, are connected with specific actions and indicate for us the relevance of social events, reference persons and the social units in which we live. Evaluations and ethical-moral principles indicate the right and wrong ways of behaving and oblige us to act in certain ways while avoiding other lines of action. Emotions support values and value-based action. Empathy, for instance – the capacity to put oneself into the shoes of others – is the basis for altruism and moral behaviour.
- Identity is mainly formed during childhood and youth but continues to change and develop significantly over the life course. Such change is connected not only to the life-course transitions from childhood to youth, adulthood and old age but also to changes in the social and cultural context in which we live. One consequence of this is that identity must continually be re-defined to some degree. Another consequence is that, in modern societies, we must speak of multiple social identities, which include our roles as children or parents, as teachers, as work colleagues and as friends, etc. In different social contexts different identities are displayed.
- The concept of identity can also be applied to social groups and associations, organisations and nation states. The variation of the characteristics of the latter (level of development, size, political character) will significantly influence people’s attachment to them.

The basic assumption of identity theory is that every person strives towards the development of a positive self-image; we associate preferentially with those others who confirm our positive self-image and tend to select jobs and pursue activities that support this positive self-image and to avoid actions and contexts which threaten it.

### **1.2 National identity and citizenship**

Membership in a nation state and citizenship may constitute a significant element of identity. People living in one single country throughout their life may not be aware of this fact. However they, too, will be affected by “banal nationalism” (Billig 1995) in their everyday lives in many ways (for instance, by consuming mainly national mass media, being proud when their country wins in international sports competitions or preferring national over foreign products). National identity comes clearly to the fore when we travel to another country or when we meet a person who looks or speaks differently to us. We

usually soon feel inclined to ask her or him “Where do you come from?” – meaning from which country (Peabody 1985). This happens frequently to immigrants even if they have lived in the country for many years or even decades. Many of them will feel embarrassed by this seemingly “innocent” question.

Let us try to deduce some research questions and hypotheses concerning this aspect of national identity and citizenship for migrants and others who do not possess the citizenship of the country in which they live.

- The level of awareness and self-reflexivity of national identity and citizenship may vary significantly between different groups of migrants and non-citizens. It will increase in line with the duration of residence in the new country and will probably be higher, more differentiated and more relevant for action among well-educated persons (Vordermeyer 2012).
- Migrants have three different reference groups (family members, neighbours, work colleagues and other contacts): those in the country of origin, the co-ethnic reference groups in the host country and the citizens of the host country. In the beginning of their stay in the host country, the first and second groups may be the strongest; later, the latter may gain in importance. Among persons with a migration background, identification with the country of origin will become weaker and often disappear altogether as a consequence of processes of assimilation (Esser 2009; Heckmann 2015).
- Membership in a nation state can be connected with strong emotional and evaluative elements. These are expressed in German terms such as *Ortsverbundenheit* (local attachment) or *Vaterlandsliebe* (literally “love of the fatherland” or patriotism). National membership can be associated with both pride and shame. Membership in a nation and citizenship also have normative implications, as expressed in John Kennedy’s famous statement “Do not ask what your country can do for you but what you can do for your country”. Compulsory military service was a significant obligation for male citizens in most nation states until recently, the duty to follow the laws of the state and to pay taxes are obligations of any resident in the territory and participation in elections is at least an implicit norm.
- Migration requires a significant re-definition of identity after arrival in another country. However, migrants will usually retain many elements of loyalty to their original identities and thus develop dual (or even multiple) national identities. The degree to which they acquire a new identity and potentially assimilate into the host society and culture will depend on many factors, including their migration motives and future mobility intentions and the size and concentration of co-ethnic communities in the host country. It will also vary according to the strength of their native identity and the difference between the cultures of the countries of origin and destination.

- There are huge differences between nation states around the world in terms of size and internal social and cultural homogeneity or heterogeneity, as well as in terms of level of socio-economic development and wealth and of political systems. Therefore, personal national identity and an interest in acquiring the citizenship of a country will vary significantly according to the characteristics of the countries of origin and destination. Immigrants will identify more with well-developed, rich and democratic countries, as well as with large and powerful states, even if these engage in problematic internal and foreign policies.

National identity refers first and foremost to the realm of ideas, values, norms and emotions. However, the relation of women and men to citizenship will also be determined by instrumental considerations, based on a calculus of costs and benefits. Naturalisation is certainly connected with many tangible benefits – such as the right to unlimited residence and unconditional return, full access to the labour market and welfare assistance. The passport of most rich Western states opens the doors to most countries around the world. Thus, the decision to give up the citizenship of the country of birth and/or of the parents and to acquire a new one may well be determined by both factors. It has been argued that an increasing number of people are choosing a “strategic citizenship” for instrumental reasons (Harpaz and Mateos 2018). The fact is that nation states today are much more interdependent, open to global influences and thus weakened in their sovereignty; their national identity will thus lose some of its former relevance for personal identity. The emergence of a global human rights regime has made citizenship less important for securing social rights (Soysal 1994). However, the central thesis of this chapter is that the ideas, values and emotions connected with national identity and citizenship will remain highly relevant, even in a globalised world. The model of the nation state cannot be considered as an outdated, conservative idea. However, we should not equate this concept with an ethnically homogeneous, closed community. Some of the oldest nation states (e.g. Switzerland, Belgium, Canada) have been multicultural political communities from the beginning. Thus, we should consider nation states as communities of people who do things together, decide commonly about their fate and cooperate in all important things (Miller 2000). Such a nation state is connected closely to a particular territory; it provides a frame of solidarity in a world society determined, to a large degree, by anonymous market forces. As a collective actor, too, the nation state still remains the most important political unit (Mitchell and Fazi 2017; Weiss 1998).

### **1.3 Citizenship and equality**

A sociological discussion of the idea of citizenship must include a systematic reference to social equality and inequality, which has been considered by many to be the central sociological issue (e.g. Dahrendorf 1974). The long-term, historical increase in social inequality from simple, tribal societies to high cultures came to a halt at the beginning of

the modern era, with the emergence of the first democratic states embracing the idea of equality between all people and basic human rights (Lanski 1966). The British sociologist T.H. Marshall (1950) introduced the well-known distinction between civil, political and social rights, a distinction which he connected with a historical sequence. *Civil rights* were established by and large in the revolutions of the eighteenth century; they refer to individual liberties – such as the freedom of thought and speech, the right to own private property, the freedom to choose one’s place of residence and occupation and the freedom to marry. *Political rights* were attained mainly in the nineteenth and early-twentieth centuries; they include the possibility for political participation for all and particularly the universal franchise in political elections. *Social rights* were attained only during the twentieth century; they provide the right to secure one’s basic socio-economic needs and to participate fully in the socio-cultural life of a society. They include the provision of education, health services, unemployment and pension insurances and welfare benefits which, in most European countries, are provided by the welfare state. Altogether, the implementation of these rights contributed significantly to a massive improvement in the conditions of life for the population at large, as shown in the increase in incomes, consumption and life expectancy.

It is usually argued that the enforcement of civil and political rights has – by and large – been accomplished in most Western democracies but that, as far as social rights are concerned, considerable gaps still exist. The latter fact is obvious if we compare the extended list of basic social rights enumerated in the *UN Declaration of Human Rights* of 1948 with the factual situation even in well-developed European welfare states – not to speak of the poorer countries of the global South. I would argue, however, and propose the following three hypotheses:

1. Even civil and political rights have not been fully attained today everywhere in the world; access to citizenship, in particular, remains a central issue.
2. In recent times, some rights come under threat again and new social groups emerge which are not fully covered by existing rights.
3. There is still a need for the extension of possibilities for political participation beyond those in a representative democracy and franchise. In the following section, let us now look at some empirical facts which show the relevance of national identity and citizenship for personal identity.

## **2. Empirical facts about people’s views of national identity and citizenship**

Empirical data on three topics are presented here: the relevance which people attach to citizenship as an aspect of national identity, the identification of migrants with their countries of origin and destination and the surprisingly high rates of non-citizens who do not apply for naturalisation.

## **2.1 Citizenship considered as highly important for national identity**

Here, I use data from the *International Social Survey Program* (ISSP), a world-wide regular annual survey which covers between 40 and 50 countries around the world and in which I have participated actively since its foundation in the mid-1980s (see Haller, Jowell and Smith 2009). In each participating country, a short survey on a particular topic is carried out among a representative sample of the population. The topics are replicated after some years (usually about 10 years), so that we can simultaneously look at international differences and at changes over time.<sup>1</sup> Two relevant issues have been covered in ISSP: a survey on *National Identity* – carried out in 1995, 2003 and 2013 – and a survey on *Citizenship*, carried out in 2004 and 2014.

A short remark on the scientific relevance of opinion surveys may be in order here. The opinions which people express in such surveys should not be taken at face value, particularly in the case of issues towards which people are indifferent and about which they have little knowledge. Three other facts, however, make such results very important. First, because we can assume that people are well aware of the problems associated with specific issues relevant to their lives; second, because attitudes are often closely related to behaviour; and, third, because public opinion is a significant determinant of political processes (Burstein 1998). We see in what follows that public attitudes often correspond very well to the dominant problems and the institutional-political situation of a country.

One question in the ISSP survey on national identity dealt directly with the issue of citizenship. We asked a question relating to the different components of national identity, which included citizenship: “What is important for being a true [national]?” A list of eight items was presented to the interviewees, the questions and answers of which are shown in Table 2.1.

Five characteristics are considered as very important for the identification of a person with a certain nation state, of which citizenship is one. More than half of the respondents consider citizenship as “very important”; if we include the answers “fairly important”; the proportion is 85 per cent (see also Haller et al. 2009). The other characteristics considered as very important for national identity are mastery of the national language, the feeling of belonging and respect for the laws and institutions of the country. These attitudes do not appear to have changed over time; the percentages were quite similar in 1995 and 2003.

It is interesting and relevant that the two items which are usually the basis for the automatic acquisition of citizenship at birth – to have been born in the country and to have ancestors of this country – are less frequently mentioned as relevant. Only 29 per cent and 37 per cent considered the items “to have [national] ancestry” and “to have been born in [country]” as very important; if we sum up very important and fairly important responses, the percentages are 69 per cent and 74 per cent respectively (for a recent study in Germany confirming this, see Miller-Idriss 2009).

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<sup>1</sup> More information on ISSP can be found on the website [www.issp.org](http://www.issp.org).

**Table 2.1. The relevance of citizenship among eight characteristics of a person's national identity, as seen by the population in 20 countries in 2013 (%)**

<b>What is important for being a true [Austrian]?</b>	<b>Very important</b>	<b>Fairly important</b>	<b>Not very important</b>	<b>Not at all important</b>	<b>Total</b>
To be able to speak [the national language]	59	28	9	4	100
To feel like a [national]	55	34	8	3	100
To respect [national] political institutions and laws	52	35	10	3	100
<b>To have [national] citizenship</b>	<b>51</b>	<b>34</b>	<b>12</b>	<b>3</b>	<b>100</b>
To have lived in [country] for most of one's life	37	37	21	5	100
To have been born in [country]	37	32	22	9	100
To have [national] ancestry	29	28	28	15	100
To be a [member of dominant religion]	18	17	27	38	100

Source: International Social Survey Program 2013 "National Identity III"; Number of interviewed persons: 25,318–25,343 (varies by row because of differing missing values). Countries include Austria, Croatia, the Czech Republic, Denmark, Estonia, Finland, France, Great Britain, Hungary, Iceland, Ireland, Israel, Japan, Latvia, Lithuania, Norway, the Philippines, Russia, Slovenia, Switzerland and Taiwan.

We can also ask how salient the belonging to a certain nation is compared to other aspects of identity. In the survey on *National Identity*, we asked this question about the relative importance of different aspects of identity: "We are all parts of different groups. Some are more important to us than others when we think of ourselves. In general, which, in the following list, is the most important to you in describing who you are? And the second most important? And the third most important?" Ten different groups were listed: family or marital status, occupational status, gender, nationality, age group, race/ethnic background, religion, region, social class and preferred political party (Haller and Müller 2009). The findings showed that nationality is not felt to be very important for personal identity. Family or marital status is considered as the most important identity by 33 per cent of the respondents, occupation by 19 per cent, gender by 11 per cent and nationality by 9 per cent. If we count how often an identity group is mentioned at all (as the first, second or third most important one), family is mentioned by 54 per cent of the respondents and nationality by 27 per cent. Thus, we must conclude that national identity is not a highly important facet of personal identity. The same is likely to be true for citizenship.

## **2.2 Dual national identities of migrants**

A central question is with which country migrants identify more strongly – with their country of origin or with their country of destination? Many factors are relevant here

– the characteristics and experiences of the individuals as well as of their countries of origin and destination. However, let us first have a quick look at some relevant empirical findings.

In a recent survey among 600 immigrants from the former Yugoslavia and Turkey to Austria, we asked directly about their identification with the countries of origin and destination. The issue was whether the respondent felt more Austrian, Croatian or Serbian etc., more Turkish or both at the same time (see also Müller-Kmet and Bodi-Fernandez 2019 on this survey). The findings are reported in Table 2.2.

**Table 2.2. The identification of immigrants from the former Yugoslavia and from Turkey living in Austria with their countries of origin and destination (%)**

I feel ...	Country of origin	
	The former Yugoslavia	Turkey
... more like an Austrian	40	20
... like an Austrian as well as a [Serbian, Croatian, Bosnian.../Turk]	43	40
... more like a [Serbian, Croatian, Bosnian.../ Turk]	16	41

*Source:* Social survey among immigrants in Austria, 2016, n=600 (Aschauer et al. 2019). Immigrants were defined by their immigration background – that is, persons or their parents born in the former Yugoslavia or Turkey.

Here we can see that identification with both countries is very frequent among the two groups of immigrants; they are distinguished from each other insofar as immigrants from the former Yugoslavia already feel that they are Austrians more frequently than those from Turkey. However, this finding indicates that, for every immigrant, a phase in life probably exists where he or she feels connected to both countries – that from which s/he emigrated and that in which s/he is now settled. A similar finding has been reported for Australia by Mariah D. Evans (1988; see also Bauböck 1994, 114; Fleischmann and Verkuyten 2016). It was also found that strong dual identifiers among the immigrants showed better psychological adjustment compared to those with a single ethnic or national identity (Zhang, Verkuyten and Weesie 2018). For children, the chance to develop a dual identity depends to a considerable degree on their mother's ethnic and national identities (Spiegler, Thijs, Verkuyten and Leyendecker 2018).

### **2.3 Surprisingly low rates of naturalisation**

A further important empirical fact concerns the rates of naturalisation in different European countries, which provide an additional insight into the expectations and fears concerning the acquisition of a new citizenship. What is the most relevant here is the

naturalisation rate – i.e. the relation between the number of naturalisations per year and the number of foreigners living a country at the beginning of the year.

Here we can observe a surprising fact – throughout Europe, these figures are very low. In 2017, 22.3 million third-country nationals were residents in the EU of whom only 825,000 acquired citizenship in one of the member states in the same year.<sup>2</sup> Thus, only 3.6 per cent of the foreigners applied for and attained citizenship. There were significant variations between countries. However, even in the country with the highest rate, Sweden, the naturalisation rate was only around 8 per cent. In six countries in Central East Europe (including Austria, the Czech Republic, Slovakia and Slovenia) it was even less than 1 person per 100; in 11 more countries (including the United Kingdom, Spain and Germany with millions of foreign residents), it was less than 2 per cent. In Germany, for instance, more than nine million foreigners (out of a total of 82 million inhabitants) were legal residents in 2016 although the number of naturalisations was only 110,383 in that year. It is highly probable that many of those foreigners, often resident in the host country for over ten years, may have fulfilled all the criteria for receiving citizenship but did not apply.

These statistical figures, which indicate a low propensity to apply for the citizenship of the host country, are supported by other data. Tomas Hammar (1990, 84ff) reports survey data for the late 1980s in Germany, Australia and the United States. In Germany, only between 10 and 20 per cent of the respondents had the intention of applying. For the United States it was estimated that, in 1980, about 3.5 million foreigners were eligible for naturalisation but did not apply; by 2010, the number was estimated at eight million (Sumption and Flamm 2012). Immigrants from Mexico in particular – the largest group – had a very low rate of naturalisation; higher rates could be observed among immigrants from Hungary and from Asian countries. In Australia, the low rate of naturalisation became a political issue. Celebrating its bicentenary in 1988, the government found that about one million of its residents had not bothered to apply for citizenship (Hammar 1990, 89ff). Therefore, a public campaign was started, under the motto “The Year of Citizenship”, to encourage immigrants who qualified to naturalise. A survey asked why non-citizens did not apply. The findings also correspond to surveys in Germany, Sweden and other countries which showed that three factors are the most relevant: sheer indifference (I did not bother), the wish to remain a member of the country of origin and the wish to return later to the country of origin. A particularly important case is Germany. In 2019, this country had 81.6 million inhabitants: among them, no fewer than 20.8 per cent had a migration background, defined as having been born without German citizenship or to at least one parent without German citizenship. Of these, 9.9 million were foreign citizens (12 per cent of total inhabitants) and 13.3 million German citizens (13 per cent

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<sup>2</sup> See [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Migration\\_and\\_migrant\\_population\\_statistics/de](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Migration_and_migrant_population_statistics/de) (12.12.2019)

of all inhabitants).<sup>3</sup> In the comprehensive German panel survey SOEP, foreigners were asked about their intention to apply for German citizenship: 8.7 per cent said “I will for sure” and an additional 11 per cent “Probably”; that is, all together only about 20 per cent (Worbs 2008).

If we look at patterns of naturalisation by countries of origin and destination<sup>4</sup> and the intentions and rates of naturalisation corresponding to the origin countries of the foreigners, two facts emerge (for the USA, see also Chiswick and Miller 2008):

- The rate of naturalisation is usually low for people immigrating from neighbouring countries with a comparable level of development and a similar cultural and political background (for instance, Norwegians and Finns in Sweden; Germans in Austria; Latin Americans in Portugal and Spain).
- The rate is higher for immigrants and refugees from countries with political oppression (such as in the former communist countries of the GDR, Czechoslovakia, Hungary and Poland) and, in recent times, by refugees from terrorism- and war-ridden countries in Africa and the Middle East.

In general, the main factors – legal-constitutional, social-structural and individual – for the low naturalisations rates may be summarised in three points:<sup>5</sup>

- In certain states it is difficult to attain citizenship (due to requirements concerning the length of stay, employment and income, living conditions and administrative costs). Countries quite hostile toward immigrants in their legal rules in the early 1990s were Austria, the United Kingdom and Switzerland; the most friendly were Belgium, France, the Netherlands and Sweden (Çinar, Hofinger and Waldrauch 1995). Since the 2008/09 economic crisis, the situation of immigrants has worsened in several aspects and many governments have implemented legal reforms, usually making naturalisation more difficult. In 2015, the countries the most open to immigration and integration in legal terms were Anglo-American and Nordic countries and those on the Iberian peninsula, while those which were the most unfriendly were the post-communist Eastern European countries and Turkey (MIPEX 2015; see also Bauböck 2007; Howard 2009). The legal situation, however, should not be confused with factual socio-economic integration, which often does not correspond with legal integration (see below).

<sup>3</sup> Bevölkerung mit Migrationshintergrund, Bundeszentrale für politische Bildung, 19.9.2019 (<http://www.bpb.de/nachschlagen/zahlen-und-fakten/soziale-situation-in-deutschland/61646/migrationshintergrund-i>, 18.12.2019)

<sup>4</sup> A comprehensive table on these patterns was prepared by EUROSTAT: <https://ec.europa.eu/eurostat/documents/2995521/9641786/3-06032019-AP-DE.pdf/db95892f-11a3-4523-ba3b-74db3799d874> (accessed 11 December 2020).

<sup>5</sup> See also the systematic presentation of these factors in Hammar (1990, 98).

- Migrants from liberal, developed democracies can obtain few additional advantages from acquiring the citizenship of the host country. Also the liberal nature of host-country laws can diminish such advantages if they reduce the rights between citizens and foreign residents so that *denizens* – foreigners who have permanent residence permits in a country – can freely choose their employment, bring in close family members and enjoy basic social rights concerning unemployment and old-age insurance and access to education and health care. This applies in particular to mobile EU citizens within the European Union; they can take up residence and employment in the EU wherever they wish. However, this also applies to long-term resident third-country nationals who enjoy robust rights as denizens (Council Directive 2003/109/EC). Nevertheless, the various levels of development between the sending and the host country help to explain the different naturalisation rates, especially where legal privileges are extensive and within a broad category of migrants. For these reasons, migrants from Bulgaria and Romania into Western EU member states apply more frequently for host-country citizenship than do migrants from wealthier EU countries.
- The continuing individual attachment to the nation state of origin is equally relevant. Studies have shown that immigrants are resistant to applying for naturalisation because they fear losing the contact, attachment and identity connected with their country of origin (for Austria, see Riegler 2000). If they have to renounce their previous citizenship, they will also lose their unconditional right to return to their country of origin.

### 3. Citizenship and social integration

Let us now discuss some additional aspects of citizenship as they appear from a sociological perspective. Two issues are dealt with here: the relationship between democratic citizenship and civic participation and obligations.

#### 3.1 *Democratic citizenship requires participation*

Representative democracy can be seen as a formal arrangement responding to the fact that any political community is divided into elites and ordinary people and where only the former exercise power. Therefore, the use of power by persons in governmental positions must be restricted and controlled. This is Schumpeter's famous definition of democracy as a method in which people elect leaders, in competitive elections, who then have the right to govern for a limited period of time (Schumpeter 1942). From such a perspective, formal citizenship – which provides the right of suffrage (franchise) – is a central element of democracy. However, the Schumpeterian model, which sees an analogy between economic market and political processes, seems to be too restrictive from a sociological perspective.

Alexis de Tocqueville (1805–1859), in his seminal book entitled *Democracy in America* (1969[1835]), saw a close connection between equality and democracy. He admired the vivid associational and political life in the United States but warned that an individualistic society would become atomised and uniform. He feared that, in Europe, where strong states had hindered the development of intermediate civic associations, a “tyranny of the minority” could emerge, leading to a new political centralisation and a “benign dictatorship”. For Hannah Arendt (1972), citizenship is possible only in a truly public sphere which, in her view, includes two important elements:

- A spatial quality: citizens must meet in concrete public spaces where they can talk to each other, discuss and arrive at common solutions. This spatial quality – whether towns, provinces or nation states – also demarcates democratic polities from each other in territorial terms.
- A distinction between public and private interests: political activity is not (only) a means to an end but an end in itself; one engages in politics in order to also realise political ideals and principles like freedom, justice, equality and solidarity.

These ideas have direct implications for the concept of citizenship. A first is that collective identities are created through political discourse and action; this, however, is not achieved once and for all but only through constant renegotiation and struggle. The second is that citizenship is relevant not only at the state level but also in the political units below it – at the regional, urban and municipal levels. Third, citizenship is a participatory concept; the active engagement of citizens in the determination of the affairs of their community provides them with an experience of freedom and a sense of political efficacy (d’Entrevies 2019); Benjamin Barber (1984) coined the concept of a “strong democracy” for such a polity. Thus, a federated system of councils through which citizens can effectively determine their own political affairs is an alternative to – or at least a substitute for, I would say – representative democracy based on bureaucratic political parties and anonymous institutions. The same is true for direct democracy as an important supplement of representative democracy, which is strongly endorsed by the general population. The ISSP Survey on Citizenship (2015) showed that 69 per cent of the 48,000 respondents in 38 countries around the world support the idea that “referenda are a good way to decide important political questions”. The implication of such a view for the topic of this discussion is clear: naturalisation as such will not always change the social and political position of individuals fundamentally. It will do so only if citizenship is realised in an active endorsement of and participation in democratic life by all the people living on the territory of a political community.

### **3.2 Citizenship as a set of obligations**

A corollary of the view of politics as a process of active discussion and engagement is that citizenship also implies obligations (Janowitz 1980; Turner 1990). The view of citi-

zanship as a concept with ethical-moral implications finds expression when we speak about a “good citizen” – meaning a citizen who is actively engaged in civic associations and political offices. Three kinds of obligation are particularly relevant: to participate in elections, to pay taxes and to undertake military service. Let us begin with a look at the first of these three obligations because it is directly connected with citizenship and the franchise.

To take part in elections is an important civic duty, even if we adhere only to the minimalist Schumpeterian definition of democracy. A contentious issue is whether this obligation could or should be cast in legal terms. In order to see what the public thinks about this issue, we can again look at findings from the ISSP Survey on Citizenship of 2014 in which a question was asked about the different characteristics of a “good citizen”; among them, two related to voting in elections. Table 2.3 reports the findings.

**Table 2.3. Characteristics and virtues of a “good citizen”: popular opinions in 38 countries around the world in 2013–2014 (%)**

	Not at all important (1*)	Important (2, 3)	Indiffer- ent (4)	Important (5, 6)	Very important (7)	Total
Good citizen: always votes in elections	5	6	2	28	53	100
Democracy: right for citizens not to vote	13	12	13	28	33	100
Good citizen: active in social or political associations	12	23	21	30	14	100
Never tries to evade taxes	2	5	6	29	58	100
Serves in the military (2004)	16	14	12	29	29	100

Source: International Social Survey Programme “Citizenship II”, 2014; N=52,550; Item “Serve in the military”: ISSP 2004; 38 countries, N=45,498.

Note: \* The numbers in parentheses refer to the values given on a seven-point scale.

We can see, first, that large majorities of people around the world (81 per cent) support the idea that voting is a basic duty of a good citizen. However, there exist huge differences between countries. In the Philippines, Venezuela, Spain and Georgia, more than 70 per cent say it is “very important”; in Australia, the USA, Sweden and Norway between 60 and 70 per cent; in most post-communist Eastern European countries, including Russia, as well as in India, these are less than 54 per cent; the lowest proportion (23 per cent) can be found in Slovakia. The explanation for these huge differences seems straightforward. It is mainly a long history of democracy and the experience that democracy is working

well (with low levels of corruption), which leads the respondents to attribute more duties to a citizen. All countries with little support for voting as a citizen's duty have had only a relatively short history of democracy and some of them are still only "semi-democracies", often ridden by high levels of corruption (Howard 2003).

Public support is much lower when it comes to a legal norm to vote. A majority (61 per cent) of the respondents think that citizens should also have the right *not* to vote. However, an obligation to vote has been considered by several scholars (Lijphart 1997; see also Spiro 2017). Two reasons can be given for this. First, turnout was and still is significantly higher when voting is obligatory; this can clearly be seen in a comparison of countries in Europe. In the European Parliament elections in 2019, turnout was 89 per cent in Belgium and nearly 60 per cent in Greece and Italy – all countries with obligatory voting; it was lowest (only between a quarter and a third of the electorate) in most post-communist EU member countries. High turnout can be regarded as strengthening the general legitimacy of representative democracy, since citizens who vote are more likely to accept decisions taken by the authorities or assemblies which they have elected.

Second, we know that turnout – and political participation in general – is lower among the less-privileged social classes and groups (Beeghley 1986; Lahtinen, Mattila, Wass and Martikainen 2017; Lijphart 1997). This means that the issues and problems which are the most relevant for them will get less attention in politics if turnout is low. Mandatory voting increases the participation rates and thus also the representation of socially marginalised groups more than those of other voters.

Let us also have a quick look at the two other duties of a citizen – to pay taxes and to serve in the military (in some countries, a fourth obligation exists, namely the duty to serve on juries). The obligation to pay taxes (which certainly also applies to denizens) seems particularly relevant in these times in which there is a significant increase of income inequality in many countries, an increase which particularly improves the situation of the highest income groups while disadvantaging the lower social classes (König 1999; Milanović 2005; Piketty 2014; Stiglitz 2013). We can mention three relevant issues in this regard.

First, the obligation to report income truthfully to the fiscal authorities is a problem mainly for self-employed people and entrepreneurs because they have to declare their income themselves. Those with very high incomes – and wealthy people in particular – have many possibilities of evading taxes by using legal strategies (Alstadsæter, Johannesen and Zucman 2018; Ötsch 2018; Piketty 2014; Ronen, Murphy and Chavagneux 2010; Scheve and Stasavage 2018). Tax-dodging efforts can be supported by corrupt tax officials and by an industry that sells wealth-concealment services. For the USA it is estimated that 30–40 per cent cheat on their returns for two reasons: because it is easy and because the risks and penalties are low.<sup>6</sup> Even for Sweden, Norway and Denmark, it

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<sup>6</sup> See <https://www.thefiscaltimes.com/2019/09/27/What-Tax-Cheats-and-Mistakes-Cost-IRS> (26.2.2020),

was estimated that the 0.01 per cent richest households evade about 25 per cent of their taxes by transferring parts of their wealth to offshore banks and territories (Alstadsæter et al. 2018). At the other end of the spectrum are many states in the global South where rich and influential people can more-or-less completely avoid being assessed for taxation. However, in some southern European countries, tax evasion is also a massive problem. The extremely high public debt of Italy, for instance, is also a consequence of the massive flight of money and capital towards Switzerland and other North-Western European countries (see Brooke 2016; Ronen et al. 2010).

If we look at public opinion on tax evasion, the findings are unequivocal: a large majority – 87 per cent – of the respondents consider it as an important duty of a citizen “never to try to evade taxes”!<sup>7</sup> This attitude also varies significantly between countries: the consent is highest in the UK and the USA, Spain, Turkey and Japan and lowest again in the post-communist countries and India. Maybe citizens in these countries lack trust in their fiscal administrations; maybe many themselves participate in different forms of petty corruption.

In this regard, the United States’ system of taxation could be a model for other countries. In most countries, a territorial-based taxation (taxing only incomes earned within the country) or a residence-based taxation is in force (taxing all income of people resident in the country). The United States is unique because it has a citizenship-based taxation system: Americans living abroad have to file a US federal tax return and pay US income tax no matter where they live. If the US has a bilateral tax treaty with their host country, income tax paid there will be deducted from their US tax debt.<sup>8</sup> Such a system would discourage prominent rich people in Europe (such as football stars, artists or managers) from taking up residence abroad (typically in low-tax countries like Monaco) in order to avoid being taxed by their own governments.

A further problem concerns the population’s inadequate knowledge and understanding of tax regulations and duties. Here, the government is called upon to make these procedures easier and to include them in school curricula. Citizens, as voters, should be encouraged to take a more active interest in tax affairs. Increasing proportions of the population resort to professional assistance, even for the most simplified of tax return forms (Janowitz 1980, 9; Kalleitner and Kittel 2018).

The third basic duty of citizens has historically been conscription – the obligation of young men to perform military service. This obligation has already had a very close relationship with citizenship in ancient Greece. The modern citizen mass army was introduced after the French Revolution. It not only turned out to be superior in terms of military power but it also created a state interest in turning all (male) persons living

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<sup>7</sup> Findings from the International Social Survey “Citizenship II”, 2014.

<sup>8</sup> See <https://www.greenbacktaxservices.com/blog/paying-taxes-american-living-abroad/> (accessed 11 December 2020).

on the state territory into full citizens while preventing the use of mercenary forces to conduct wars and to suppress citizen rebellions. The French innovation led to a demand for increasing numbers of soldiers in most other states. The bureaucratic obligation for each person on the territory of a state to continually carry a personal document proving his identity was a direct consequence of military-service obligations (Noiriel 1994). In most Western countries, however, conscription has been abandoned in recent years.<sup>9</sup> This has removed one obstacle to the granting of dual citizenship to men although, already, in the past, most states exempted from military service their citizens who were living permanently abroad.

General conscription in modern times was progress compared to former systems, when soldiers were recruited by force. This was particularly the case in countries in which young men could choose between military service and an alternative community service. Some present-day authoritarian and conflict-ridden countries (e.g. Somalia, Afghanistan), however, combine general conscription with the use of force. Therefore, many young men flee in order to avoid a very long and life-threatening military service. With regards to conscription and military service, the problem of social inequality is also relevant. Rich and influential people can evade military service. Today, after the abolishment of obligatory military service, the American armed forces are somewhat disproportionately drawn from the lowest and highest parental-income classes; even immigrants are recruited with the promise that it will make obtaining citizenship easier (Asoni and Sanandaji 2013).

However, in a few countries, conscription is still in force and endorsed by the population. In January 2013, a referendum took place in Austria about the abolition of conscription but 52.4 per cent of the participants voted for its maintenance. Among the reasons for this result were the services of drafted soldiers in cases of natural disaster and the feeling of security which the army provided to people in the regions near the Iron Curtain when Soviet troops invaded Hungary in 1956 and Czechoslovakia in 1968; recently, the army was also used to assist border police in detecting irregular migrants.

So what about global public opinion in this regard? Table 2.3 shows that, in 2004, about a third of the respondents in 38 countries were strongly in favour of military service as the duty of a good citizen; summing up the positive answers, 58 per cent endorsed it.<sup>10</sup> There exist significant differences between countries: military service is the most frequently considered as a citizen's duty in Israel, the United States, Brazil and some other Latin American states, as well as in Russia and several post-communist Eastern European countries; it is considered to be the least important in Germany, the Netherlands, Switzerland, the Czech Republic, Slovakia and Japan. A close connection seems to exist here

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<sup>9</sup> In 2013, only five of the 28 members of NATO still had obligatory military service (Denmark, Estonia, Norway, Turkey and Cyprus). See <https://www.sn.at/politik/weltpolitik/wie-andere-laender-die-wehrpflicht-regeln-5357479>.

<sup>10</sup> In ISSP 2014, this item was unfortunately excluded.

between the bellicose or peaceful orientation of a nation state (which is also related to its size) and the attitudes of its population.

There are several arguments in favour of conscription – it is said to instill maturity in and patriotic feelings among young men and to provide vocational training and thus open up opportunities for social ascent for men from the lower classes. Some have also proposed to replace male conscription by a general mandatory civil or national service for both young men and young women. While such an institution would remove gender inequality, it would also encounter serious obstacles. The whole volunteer system would be challenged, it would be difficult to provide enough jobs, the administration would be difficult and considerable sections of the population would oppose it strongly. It would also break Art. 4 of the European Convention on Human Rights, which forbids states to oblige their citizens to perform compulsory labour – thus, it is not a realistic option.<sup>11</sup> Libertarians argue against conscription because they see it as a kind of “involuntary servitude”,<sup>12</sup> feminists consider it as sexist, serving the interests of patriarchy and an aggressive view of males (although recently some feminists have also advocated the drafting of women); from an economic perspective, it is a waste of time and manpower. Personally, I think that the abolition of conscription is a sign of human progress simply because it reduces the number of people who serve in the military; as a consequence, it may also increase the general rejection of war.

#### 4. Concluding remarks

Citizenship is a central component of the national identity of people in modern societies. The two main propositions in this chapter were that citizenship involves a symbolic-identitarian and an instrumental-utilitarian meaning. Migrants, particularly those of the first generation, will typically have dual national identities in the sense of an attachment to both their country of origin and that of arrival. However, the individual relevance of citizenship varies significantly between the different nation states, depending on their socio-economic and political situation. Empirical data from the International Social Survey Program (ISSP) have been presented which reveal the attitudes of the general public around the world concerning the relevance of citizenship for personal and national identity. The proposition that citizenship has symbolic meaning was clearly supported. Data showing surprisingly low naturalisation rates in countries of immigration confirm that first-generation migrants have a dual bond – to their countries of both origin and destination. The propensity to apply for naturalisation, however, also depends on strate-

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<sup>11</sup> For summaries of the problems, see <https://www.nytimes.com/2019/06/21/magazine/mandatory-national-service.html> and <https://www.procon.org/headline.php?headlineID=005433> (accessed 11 December 2020).

<sup>12</sup> See <https://en.wikipedia.org/wiki/Conscription> (accessed 11 December 2020).

gic-utilitarian considerations: persons from poor and conflict-ridden countries are more interested in attaining the citizenship of their country of residence, while “denizens”, who already hold most social rights in their new countries (as is the case for migrants within the European Union), are less interested in attaining a new citizenship.

The final section argued, following Alexis de Tocqueville (1969[1835]) and Hannah Arendt (1972), that citizenship should include civic participation – i.e. an active involvement in social and political life, as well as obligations – such as that of paying taxes and completing their military service. While the latter obligation has been suspended in recent times in many countries, at a time of increasing opportunities for tax evasion by rich people, the former is more relevant than ever. In this regard, too, international survey data were presented showing strong agreement on the obligation to participate in elections and pay taxes.

In conclusion, three issues are addressed from a sociological perspective: the targeted facilitation of naturalisation, expansion of the toleration of dual citizenship and the improvement of the situation of denizens.

The general improvement in access to citizenship is an aim that is supported by most legal scholars and political scientists. It must also be approved from a sociological perspective. It is certainly an important aim in those countries which still impose very harsh conditions for naturalisation. However, citizenship can and should not be granted unconditionally. The personal, social and political significance of the nation state and – as a consequence – national citizenship will remain an important social fact for the coming decades. An indiscriminate conferral of citizenship would hardly be tolerated by the population at large. Yet, if concrete conditions are mentioned, general attitudes are not so negative. In the ISSP Program 2013 *National Identity III*, carried out in 20 countries, the item “Legal immigrants who are not citizens should have the same rights as [country] citizens” was presented to the respondents; 39 per cent agreed with it while 38 per cent did not. In the ISSP survey of 2014, *Citizenship II*, the item was formulated thus: “Long-term residents of a country, who are not citizens, (should) have the right to vote in that country’s national elections” – a statement which was supported by 48 per cent of the respondents and rejected by 28 per cent.

Clear and, to some degree, even strict conditions for naturalisation also have a positive function. Research on the integration of immigrants in Europe has shown that they are better integrated in those countries where access to social-security benefits and citizenship is more difficult and dependent on specific requirements, such as language knowledge (Koopmans 2015). This is not only the result of a selection process; strong requirements may also induce immigrants to invest more efforts into their integration. Immigration is effectively controlled in Canada and Australia and they also have high naturalisation rates (Bloemraad 2006). However, a goal conflict might exist here, particularly concerning refugees. Naturalisation would be particularly helpful for those persons (probably the less-well educated) who have difficulty obtaining any paid employment

or any jobs at all (for Europe, see Koopmans, Statham, Giugni and Passy 2005; for the United States, Sumption and Flamm 2012). Thus, stronger restrictions on naturalisation can have a perverse effect, by excluding from naturalisation exactly those persons and groups who would need it the most (Vink 2015). Politics should, in particular, encourage those with less human and social capital to consider applying for citizenship. For highly qualified experts and the rich, it is much easier to gain citizenship. In many countries, a group of “moneyed immigrants” exists who buy houses, invest money and benefit from having a foot in the EU (in Cyprus and Malta, they can effectively *buy* European Union citizenship). Moreover, hidden racist attitudes, particularly against Muslim populations, might lurk behind strict requirements for naturalisation (Lewicki 2017). In this regard, governments should have the courage to act to some degree against public opinion, whereby a discrepancy exists in the attitudes toward dual citizenship for emigrants and immigrants; in regard to the former, they are much more positive than to the latter (Vink et al. 2019).

Another conclusion is to expand the tolerance for dual citizenship. This is proposed by most constitutional scholars and political scientists (Blatter, Sochin D’Elia and Buess 2018; Faist 2008; see also Harpaz and Mateos 2018; Spiro 2009; Vink, Schmeets and Mennes 2019). However, it should also be endorsed on the basis of sociological findings, which show that the attachment to and identification with the citizenship of the native country possesses high value for many emigrants. Dual social and national identities are a reality for many migrants, up to the second and often also the third generation. To assume that they will be characterised by a problematic “dual loyalty” is unfounded (Baron 2009). Surveys in 14 Western countries have shown that immigrants experience stronger attachment to the host nation if they have its citizenship, at least in those countries where the population attaches great importance to citizenship as a mark of national membership (Simonsen 2017). A Swiss study found that loyalty to the countries of descent and of residence is even positively related (Schlenker 2015). However, the granting of a second citizenship should be restricted to those persons who actually have a real interest in it and who, in some way, are ready to participate in the social, public and political life of a country. A well-ordered liberal democracy needs committed citizens (see also Bauböck 1994, 115). This principle would also preclude the collective conferral of citizenship to, for example, co-ethnic groups living outside a country (see Milano 2001; Pogonyi 2017).

For many migrants, especially internal ones within the European Union, the attainment of a new citizenship has no priority. They are already beneficiaries of comprehensive civil and social rights in their new country of residence, such as the right to settle there permanently and to freely choose their employment, as well as full access to the education and health systems and social security (the right to settle, however, is limited by the obligation to be able to provide for oneself in financial terms and to have health insurance). However, a situation where a large proportion of the residents are without

full political rights is highly problematic. First, in some regards, these denizens are not really fully integrated in socio-economic terms, either because of specific access barriers or because they do not meet the necessary social preconditions (in terms of education, linguistic fluency or knowledge of unwritten social rules). Second, it is highly problematic for a democracy if significant fractions of the population do not have full rights to participate in politics. One could say that such a situation “educates” these people not to develop an interest in politics from the beginning (MIPEX 2015). The discrimination against long-term resident non-citizens applies not only to elections but also to civic and political associations of all kinds. A vivid democracy should encourage the active participation of all citizens in all their social and political affairs: in their children’s schools, in local neighbourhoods, in town and municipal politics, in work organisations and unions and in voluntary civic and political associations. For citizens of EU member states, access to elections could also be granted at all levels after a certain period of settlement in another member country. European citizenship would have more real political meaning in this way, too. The idea of extending voting rights to immigrants is generally supported by the public in many countries, as shown earlier.

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