



Grounds for citizenship: Public attitudes in comparative perspective

Asaf Levanon^{a,*}, Noah Lewin-Epstein^b

^a Department of Sociology, 450 Serra Mall, Building 120, Room 160, Stanford, CA 94305-2047, United States

^b Department of Sociology and Anthropology, Tel Aviv University, Levanon St., Tel Aviv 69978, Israel

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ABSTRACT

Information on the institutional arrangements of citizenship is increasingly available. However, we currently have only limited knowledge on the contours of public opinion towards citizenship. We seek to remedy this neglect by documenting patterns of support toward the most dominant citizenship principles: *jus soli*, *jus sanguinis*, and *jus domicile*. Specifically, we combine responses to questions on these principles to create a single measure of opinion toward citizenship law that encompasses three dominant citizenship approaches: assimilationist, exclusionary, and pluralist. Using data from the 2003 International Social Survey Program (ISSP) module on National Identity, we examine cross-national differences in support for the three approaches. Our results indicate that only two regime-types can clearly be identified – a pluralist regime, which centers on the importance of *jus soli* and includes traditional settler societies and Sweden, and an assimilationist regime, which is typified by its acceptance of *jus domicile* and includes the post-colonial empires of France and Britain. On the individual level, our analysis highlights the importance of perceptions of threat, either economically or culturally, in shaping public opinion toward citizenship.

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1. Introduction

Modern citizenship – denoting membership of individuals in a nation-state with certain (universalistic) rights and obligations – is one of the key institutions in contemporary societies. Marshall (1964) is often credited with the first systematic sociological treatment of citizenship. His ‘evolutionary’ theory of citizenship which posited the expansion of rights – from civil, through political, to social – hailed the growing incorporation of those entitled to citizenship. While his writings still command the attention of scholars, recent research has underscored the fact that Marshall’s historical progression no longer applies in many liberal democracies as non-citizen residents enjoy substantial civic and social rights (Howard, 2006, p. 445). Yet, the relevance of national citizenship has not necessarily diminished. Citizenship still serves as a powerful instrument of social closure and stands at the very core of national identity (Brubaker, 1992; Castles and Davidson, 2000).

In recent decades the meaning and scope of citizenship has been complicated and its boundaries have been contested. Of recent developments, two in particular have engendered a rise in public and academic interest in the issue of citizenship and its boundaries (Miller, 2000). The first is growing economic and cultural globalization and especially international migration, which brought about ethnic diversity in societies that were relatively homogenous. A second development is the growing tendency of social groups (ethnic, religious, sexual, etc.) to try and re-mould citizenship so that it better accommodates fractionalized forms of identity. These developments, reflecting large scale social-demographic changes as well as cultural changes (e.g., hegemony of a liberal market ideology and growing awareness of human rights), have strained the nation-state

* Corresponding author. Fax: +1 650 725 6471.

E-mail addresses: levanon@stanford.edu (A. Levanon), noah1@post.tau.ac.il (N. Lewin-Epstein).

(Bauböck, 1996). In an attempt to restore the balance between the territorial and political boundaries and the growing complexity of society some states have responded by making adjustments to the definition of their citizenry and the principles of joining the political and national community (e.g., Howard, 2006; Shanahan, 1997; Weil, 2001; Zolberg, 1997). In many countries certain groups of non-citizens enjoy a privileged status which is short of citizenship but considerably better than that of foreigner (Soysal, 1994, 1996). Others lack secure residence and tend to live on the margins of society (Hammer, 1990). Hence, one might think of an array of groups – citizens and non-citizens – ordered by their access to resources and the range of their participation in society (Kymlicka and Norman, 2000).

It is the boundaries along this array and the role of citizenship status in the minds of the public that we intend to explore. Specifically, we focus in this paper on public attitudes regarding the grounds for citizenship and study the attitudes in relation to individuals' location in the social system and the citizenship regime that characterizes their society. Our aim, therefore, is twofold: first, to gauge the variation in public perceptions of the right to citizenship across countries and the extent to which the perceptions are consistent with the prevailing citizenship regime and, second, to investigate hypotheses regarding the relationship between attitudes and social-demographic characteristics.

2. Societal mood and citizenship policy – the relevance of public opinion

Less than two decades ago, Brubaker (1992) lamented the lack of attention of sociology to the institution of citizenship; a failing that has since been rectified as the topic has become the focus of rapidly growing sociological research (e.g., Alienikoff and Klusemeyer, 2000, 2002; Howard, 2005, 2006; Joppke, 2003; Soysal, 1994). Paraphrasing Brubaker, one might argue today that in the past decade sociological research has focused almost exclusively on advancing our understanding of the institutional arrangements of citizenship and the changes they have undergone, but has paid rather little attention to the formation of public perceptions of citizenship and the rules that govern membership in the polity. Hence, before we introduce our expectations regarding similarities and differences across countries in the public's perception of grounds for citizenship it will be useful to underscore the relevance of such attitudes as a social indicator.

The role of public opinion in policy formation has long been debated. A review of this debate, however, is beyond the scope of this presentation. Suffice it to point out that choices among citizenship rules "... are usually shaped more by historical experience, existing cultural norms and expedient political calculations than by deduction from abstract principle or compelling logical consistency" (Alienikoff and Klusemeyer, 2000, p. 2). As noted earlier, citizenship rules are strongly linked to migration policy as the latter represents a society's efforts to simultaneously address the issues of inclusion and closure. These policies, states Castles (2004), are driven by many factors both internal and external to any given society.¹ Indeed, Howard (2006) has argued that greater attention needs be given to the *politics of citizenship* and to the fact that public opinion may be mobilized in democratic societies on issues of migration and citizenship, often resulting in restrictive outcomes.

Inasmuch, then, as citizenship rules reflect purposeful decisions in the political arena, they clearly have important underpinnings in the attitudes of the public as well as of legislators (Lahav, 2004). Indeed, this paper is premised on the notion that policies are not developed and implemented in a political vacuum. The importance of this approach lies in the fact that public attitudes, expressed directly through polls and indirectly through agents and brokers, reveal the societal mood and have gained an important position in shaping policy (Crespi, 1997; Kuechler, 1998). A cross-national study of attitudes regarding the entitlement to citizenship carries the potential of assessing both individual-level correlates of the attitudes and the correspondence between a country's formal citizenship regime and the societal mood.

3. Citizenship regimes or disjointed policies?

Rules of becoming a citizen vary and in some countries have undergone considerable change in recent years (Howard 2006; Weil 2001). Reflecting the collective mode of understanding and organizing of membership in national polities, citizenship policies provide the resources and mechanisms for incorporating immigrants into host polities (Soysal, 1994) and for defining relations with expatriates. Several typologies have been proposed by citizenship theorists to capture the cross-national variation in citizenship rules (Brubaker, 1989; Castles and Miller, 2003; Howard, 2006; Soysal, 1994). We build on these typologies of citizenship regimes as a framework for a cross-national comparison of public attitudes toward the right to citizenship. In this section we will first motivate our focus on cross-national differences in the contours of the citizenship regimes. We then outline the main principles of citizenship law. Finally we will discuss the types of citizenship regimes identified by citizenship theorists.

It is important to distinguish the term *citizenship regime* we use here from the broader concept of *incorporation regime* (Entzinger, 2000; Soysal, 1994). As Freeman (2004) has pointed out, immigrant incorporation is multifaceted and involves a range of regulatory institutions in the state, market, welfare, and cultural spheres. Observing the membership status of foreign-born individuals in Western nation-states, several scholars have recently noted that although they lack formal citizenship status, they are increasingly incorporated into various organizational and legal structures of the host society. This new

¹ The principal external factors that have drawn researchers' attention are growing economic globalization (Sassen, 1996) and the spread of a post-national human rights discourse (Benhabib, 2004; Soysal, 1994). Among the factors within political systems one might list well-defined and organized interests (Freeman, 1992), attitudes of citizens that arise from their concerns for their jobs or their housing conditions (Fetzer, 2000) or conversely, from a desire for "... a more vibrant cultural mix" (Castles, 2004, p. 866).

model of incorporation regime, which Soysal (1994) terms post-national citizenship, is centered on universal personhood and is grounded in a transnational community, through international codes, conventions, and laws on human rights. The present paper, however, focuses exclusively on the state and the legal status of citizenship; hence we refer more specifically to *citizenship regime*. A recent paper by Gorodzeisky and Semyonov (2009) explicitly addresses the distinction between public attitudes toward the two dimensions by distinguishing between exclusion from the country and exclusion from equal rights. Gorodzeisky and Semyonov find that objection to admission of foreigners to the country is more pronounced than objection to allocation of equal rights. As mentioned above, one of our primary aims in this study is to examine the correspondence between traditional conceptions of nationhood that are reflected in the citizenship laws of various Western countries and public support for these conceptions. A focus on exclusion from the country follows directly from this aim. This leaves the study of public attitudes toward exclusion of foreigners from equal rights beyond the scope of the present paper.

In general, laws of citizenship derive from two theoretically competing principles: *jus sanguinis* (law of the blood), which is based on descent from a national community, and *jus soli* (law of the soil), which is based on birth in the territory of the country. The former principle is linked to the ethnic model of the nation-state, while the latter is related to a nation-state built through the incorporation of diverse groups in a single territory (Brubaker, 1992). Currently, an additional principle is gaining momentum: that of *jus domicile* (law of residence), according to which people may gain an entitlement to citizenship by means of naturalization based on residence in a territory or a country (Castles and Davidson, 2000). In practice, citizenship rules in all modern states reflect a combination of the above principles, although one or the other usually predominates (Brubaker, 1989). In particular, whether or not the *jus soli* criterion is applied automatically or at all, and the time frame for applying *jus domicile* have been deemed central to the distinguishing features of citizenship policy (Howard, 2006; Waldrauch, 2006; Weil, 2001).²

Citizenship laws are informed by distinctive traditions of nationhood (Brubaker, 1989; Favell, 1998). In Anglo-American literature, an ethnic group that controls a bounded territory becomes a nation and establishes a nation-state (see Smith, 1991). Such nations tend to develop a pluralist citizenship regime in which immigrants are granted equal rights in all spheres of society. Immigration law in countries following this tradition confers citizenship on all persons born in the territory controlled by the state (Brubaker, 1989; Castles and Miller, 2003). Continental European views on the relationship between nation and ethnic group typically followed a different view, based on the distinction between *Kulturnation* (cultural nation) and *Staatsnation* (state nation or civic nation). As Habermas (1994) points out, nation-state formation in Germany was based on romantically inspired middle-class notion of *Kulturnation* – a nation defined by its culture – and was the embodiment of the collective and its superior meaning. Countries following this notion of membership traditionally adopted an exclusionary model of citizenship that is based on decent (Brubaker, 1989; Castles and Miller, 2003). However, the conception of citizenship has recently expanded in some countries that had followed this tradition to allow for *jus soli* (Joppke 2003). The French *Staatsnation*, in contrast, developed through the democratic revolution (Brubaker, 1992; Favell, 1998). Based on common will, the nation-state is interpreted as a political project of the community formed by the citizens at will and as capable of transcending the tension between universalism and particularism. The citizenship regime in France and other countries following this tradition is based on an assimilationist model that allows immigrants to become members of civil society at the price of cultural assimilation. Citizenship laws in this regime-type are more complex and are based on combination of *jus soli* and *jus domicile* (Castles and Miller, 2003).

For the purposes of our comparative study, we draw on the citizenship regime typology offered by Castles and Miller (2003), which distinguishes among pluralist, assimilationist, and exclusionary regimes. The distinction between the three regimes closely matches the discussion of citizenship laws presented above. The dominant principle in pluralist regimes is *jus soli*. We focus in this study on three countries that fit this description: Australia, Canada, and the US. Although Sweden has traditionally emphasized *jus sanguinis*, it recently underwent a dramatic transition from an exclusionary regime to a multicultural regime (Castles and Miller, 2003), whose citizenship law combines all three principles. It is therefore more difficult to classify Sweden than other countries in our study. Castles and Miller (2003), however, argued that Sweden's citizenship and immigration policies are quite similar to those of classic settler societies which tend to be pluralistic more than assimilationist.³ Assimilationist regimes combine *jus soli* (conditioned on residence by parents) and *jus domicile*. France and Britain are the two countries in our study that fit this description (see Waldrauch, 2006; Weil, 2001). In exclusionary regimes, the main principle is *jus sanguinis*. Countries in this study that exhibit this pattern are Austria, Denmark, and Israel. Although Germany is somewhat less restrictive and has recently introduced the *jus soli* with some restrictions, we include it in this category as well. In doing so, we follow Castles and Miller (2003), who place Germany in the exclusionary category, and Freeman (2004), who characterizes Austria and Germany as exclusionary and resistant to multiculturalist and assimilationist policies.⁴ However, recent reviews of citizenship laws of the countries we study (e.g., Waldrauch, 2006; Weil, 2001; see also Koopmans and Statham, 2000) point to the emerging similarity

² This implies that no country exclusively relies on *jus domicile*. Rather, where applied, *jus domicile* complements *jus sanguinis*, *jus soli*, or a combination of the two.

³ Acknowledging the different views on the location of Sweden (e.g., Castles and Weil 2001), we also tested two other specifications in which Sweden was considered either as similar to the assimilationist regime or as belonging to the exclusionary regime. Empirically, we did not find support for these models, suggesting that Sweden belongs to the pluralist regime-type in terms of public opinion.

⁴ Additional support for this decision comes from two other sources that empirically address the citizenship structure of European societies. Howard (2006) places Germany in the restrictive category, together with Austria and Denmark. Along the same line, Niessen et al. (2007) identify Austria, Denmark and Germany as having rules unfavorable for foreigners in their access to nationality scale (which is a sub-component of a broader migration integration policy index that also includes labor market access, family reunion, long-term residence, and political participation).

between the citizenship law of Germany and the conditions for citizenship in Britain and France. Our hypotheses, detailed below, will therefore address these conflicting views on the citizenship structure in Germany. In [Appendix A](#) we outline the dominant principles of citizenship of the 10 countries included in the study. For a detailed review of citizenship laws in European and North American nations see [Waldrauch, 2006; Weil, 2001](#).

There are several problems with identifying the type of citizenship regime to which countries best fit. First, some researchers argue that the search for a general typology is unproductive ([Freeman, 2004; Koopmans and Statham, 2000](#)), as there is only a poor fit between actual cases and “ideal” regime-types. Some countries fit into more than one category while other countries are hard to place in any formal typology. [Freeman \(2004\)](#) has suggested instead to focus on cases rather than ‘lumping’ them and to consider the combination of policies across four spheres – state, market, welfare, and culture. Yet, when summarizing his review, Freeman identifies several incorporation schemes – or *syndromes* – which are less coherent or formal than what is implied by the term regime, but nonetheless are recognizable clusters and serve to group various Western democracies.⁵ Second, citizenship typologies are based largely on traditional perceptions of membership that historically shaped the citizenship structure and do not capture some of the nuanced changes that are taking place in advanced economies ([Joppke, 2003; Weil, 2001](#)). Third, some of the countries that we study are members of the European Union, and as such are also affected by the process of European integration. Nevertheless, it is still the case that national traditions continue to shape the public discourse and citizenship practices ([Pruess et al., 2003](#)). In considering the countries under study we aimed to sort them into categories that best capture their citizenship policies.

4. Citizenship regimes and public opinion regarding grounds for citizenship

Addressing the variation in public attitudes toward access to citizenship among rather distinct citizenship regimes, we offer four hypotheses for cross-national variance in support for the three citizenship laws: pluralist, assimilationist, and exclusionary. The typology of citizenship regimes developed by [Castles and Miller \(2003\)](#) suggests that traditional conception of citizenship still inform citizenship policies across advanced economies. We extend their work from the realm of policy to the realm of public opinion, by examining whether traditional notions of citizenship also shape the perception of the grounds for granting citizenship among the public. The three-category typology leads to an expectation for cross-national differences in attitudes toward citizenship, which we specify in our first hypothesis (H1). First, where belonging to the nation is based on membership in a specific ethnic group, as it is in countries that adopt the exclusionary model, support for an exclusionary approach is expected to be higher than support for the other two approaches. Assimilationist countries are characterized by a policy designed to incorporate minorities into society, generally through a one-sided process of adaptation. Thus, we expect that in countries espousing the assimilationist model support for the assimilationist approach will be higher than for the two other approaches. Finally, settler societies have pluralist citizenship regimes that enable full membership in the nation-state for all those born in the country. Hence, we expect that in countries adopting the pluralist model support for the pluralist approach will be higher than for other citizenship approaches.

Attempts at describing the contours of citizenship with references to clearly distinguishable ideal-typical regimes have been increasingly coming under attack, as we mentioned above. Specifically, any attempt to represent cross-national differences in citizenship policies with a broadly defined typology will inevitably ignore nuanced differences within each ideal-typical category and specific changes that are taking place in advanced economies ([Freeman, 2004; Joppke, 2003; Weil, 2001](#)). Considering this within regime-type variation leads to a competing hypothesis, which predicts idiosyncratic patterns of support for each of the citizenship approaches outlined above, based on particular historical conditions and political developments; that is, country particularities will thwart any formal categorization (H2).

A detailed reading of our discussion of the countries included in our study suggests a third alternative. The most dramatic changes in the citizenship structure have taken place in recent years in countries that were previously characterized as exclusionary ([Joppke, 2003](#)). Thus, one might expect that the exclusionary model will lose its distinction much more so than other regime-types. According to such a scenario, which we consider as our third hypothesis (H3), only assimilationist and pluralist countries will still retain their distinction in terms of public support for different ground for citizenship. A final hypothesis (H4) provides a more nuanced version of the third hypothesis, suggesting that among the exclusionary regimes, Germany experienced the most notable change – toward a citizenship structure that resembles that of France and Britain ([Waldrauch, 2006; Weil, 2001](#)). Hence, we will examine whether public opinion in Germany indeed follows a similar pattern as in the former colonial countries.

5. Individual-level determinants of attitudes concerning grounds for citizenship

We draw on theory and research concerning inter-group relations when considering the social attributes of individuals with which attitudes toward citizenship right are associated. In this regard we note that immigration and growing cultural diversity pose a challenge to citizenship in two respects: first, admitting the *other* to citizenship is perceived as a threat to national cohesion and national identity. The dominant group and those whose identities are strongly linked to national-ethnic

⁵ [Freeman \(2004\)](#) distinguishes (with some reservations) between 4 syndromes: formal multiculturalism – exemplified by the United States, Canada, and Australia; uneasy multiculturalism – exemplified by Sweden and the Netherlands; resistance to multiculturalism and assimilation (exclusionary) – exemplified by Germany, Austria, and Switzerland; and differential exclusion – Spain, Portugal, and Greece.

affinities stand to loose most from such changes. With economic decline, a second threat becomes more pertinent, namely the threat to well-being posed by growing demands on available resources. This threat is directed primarily toward the working class whose conditions of life are likely to be altered.

There is ample empirical support for the effect of group threat on inter-group attitudes and relations (Bobo and Hutchings, 1996; Olzak, 1992; Rosenstein, 2008) and on attitudes toward immigrants (Kunovich, 2004; Meuleman, Davidov, and Billiet, 2009; Quillian, 1995; Rajzman and Semyonov, 2004; Rajzman et al., 2003; Scheepers et al., 2002; Semyonov et al., 2004). We extend the work on inter-group relations by focusing on the effects of perception of threat on attitudes toward access to citizenship. Conceptualizing citizenship as a mechanism for closure (Brubaker, 1992), we address three dimensions that shape perceptions of threat by individuals and consequently the attitudes toward the conditions for citizenship. All four dimensions reflect a perception among individuals of citizenship as primarily a status to which access should be restricted.

We consider the perception of immigrants by the natives, particularly the degree to which natives consider immigrants as a threat, either to the ethno-cultural character of the state or to economic conditions and rights that the nation affords to its citizens. Previous research suggests that a perception of threat leads individuals to express support for limiting the rights and resources afforded to immigrants (Rajzman and Semyonov, 2004; Rajzman et al., 2003). Such reaction suggests that those perceiving immigrants as posing a threat to their interests are guided by an understanding of citizenship as a mechanism for social closure. Another possible and more direct vehicle for limiting the access of immigrants to resources provided by the state is to limit their access to citizenship. Thus, we expect that a perception of socio-economic and ethno-cultural threat will motivate individuals to support more restrictive citizenship policies; that is, higher support for the exclusionary approach, in comparison to the assimilationist and pluralist approaches (H5).

Opposition to globalization represents another, albeit indirect, measure of threat (Mayda and Rodrik, 2005; O'Rourke and Sinnott, 2001; Ram, 2004; Scheve and Slaughter, 2001). We therefore expect individuals reporting anti-globalization attitudes to favor more restrictive citizenship policies, resulting in higher support for the exclusionary approach (H6). The dual character of citizenship, as an internally inclusive membership association established for an exclusive-bounded citizenry, motivates a focus on patriotism. Patriotism emphasizes similarity and increases the solidarity among individuals belonging to the nation (Bar-Tal and Staub, 1997). Therefore, we expect that greater patriotism will lead to a higher support for the exclusionary approach, in comparison to the assimilationist and pluralist approaches (H7).

6. Data and methods

Data for this study were derived from the International Social Survey Program (ISSP) module on National Identity, which was fielded in 2003. The ISSP is designed to provide high quality and comparable data with the explicit purpose of multi-cultural, multi-national comparative research. To this end, particular attention is given to instrument development, question wording, ordering, and meaning equivalence. Survey data are collected by means of face-to-face interviews with national representative samples of residents 18 years and older. For the purpose of present study, 10 of the countries were selected for analyses. These countries represent different citizenship models as described earlier.

Since the aim of the study was to examine the perceptions of the populace that make up the polity regarding access to citizenship, non-citizens and very recent immigrants were excluded. This procedure resulted in sample reduction, to a varying degree, with remaining samples ranging from 510 in Israel to 1289 in France. All national samples were combined into a unified data set, with a total of 9665 cases, in order to carry out the comparative analysis.

6.1. Dependent variable

Based on the theoretical classification discussed above, we identify three approaches: one is the pluralist approach, a second is an assimilationist approach, and a third is an exclusionary approach. The operationalization of this variable is based on responses to three statements that were included in the survey. In each case respondents were asked how much they agreed or disagreed with the statement on a five point scale (1 – agree strongly and 5 – disagree strongly). The first item stated that “children born in [COUNTRY] of parents who are not citizens should have the right to become citizens” (*jus soli*). The second item stated that “children born abroad should have the right to become [COUNTRY] citizens if at least one of their parents is a [COUNTRY] citizen” (*jus sanguinis*). The third item stated that “legal immigrants to [COUNTRY] who are not citizens should have the same rights as [COUNTRY] citizens” (*jus domicile*).

Responses to each of the items were dichotomized to contrast those who disagree (response categories 4 and 5) with all others (categories 1–3). Since each of the three items was dichotomized eight permutations were possible (2^3). The eight profiles were combined to represent three types of attitudes. Support for a pluralist approach is distinctive in supporting *jus soli* while rejecting *jus domicile*. This follows from our previous discussion on citizenship regimes, which noted that the dominant principle in pluralist countries is *jus soli*. Support for the assimilationist approach has the distinctive aspect of supporting *jus domicile*.⁶ Finally, support for the exclusionary approach is distinctive in its rejection of both *jus soli* and *jus domicile*. This approach is represented by two patterns of support: those agreeing only with the statement that a person born

⁶ We include in this category a small number of cases (less than 4% of the population) that supported *jus domicile* and curiously rejected either of the two other conditions. This decision stems from our view of *jus domicile* as more universalistic and inclusive.

abroad should be granted citizenship if at least one of the parents is a citizen (i.e., *jus sanguinis*) and those disagreeing with all three statements about the conditions for citizenship. Note that people supporting the latter pattern still allow for granting citizenship based on decent, since they still allow for individuals born in the country to become members if at least one of the parents is a citizen. See [Appendix B](#) for a description of the eight profiles and their relation to the three attitudes toward conditions for granting citizenship.

6.2. Independent variables

Although country differences are of central interest for this study, we also examine individual characteristics and their relationship to perceived grounds for citizenship. The individual-level variables include (complete wording for all questions and the scaling properties of the measures appear in [Appendix C](#)):

Perceived economic threat: Measured as the mean score on two items regarding the effect of immigration on the economy. Response categories ranged from “strongly agree” to “strongly disagree” on a 5-point scale. High score on this measure represents greater perceived threat.

Perceived cultural threat: This index addresses the concept of ethnocentrism and is measured as the mean response on three Likert-type items. Response categories ranged from “strongly agree” to “strongly disagree” on a 5-point scale. High scores on the constructed variable represent stronger exclusionary attitudes.

Opposition to globalization: This construct taps sentiments of anti-globalization. It was constructed on the basis of responses to seven items on the perceived effects of globalization. The items were posed as agree/disagree statements. Possible responses ranged from 1 (definitely agree) to 5 (definitely disagree). The score for all items were reversed and averaged so that high scores represent stronger isolationist sentiments.

Patriotism: We used the conception of patriotism proposed by [Heath and Tilley \(2005\)](#). Measurement is based on a 5-item battery that gauges pride in, and support for, one’s country. These were presented as agree/disagree statements and the response categories ranged from 1 (definitely agree) to 5 (definitely disagree). The five items form a one-dimensional scale and respondents were given the average score on all items (after reversing the scoring for some of the items). A high score indicates stronger patriotism.

Perceived class position: In order to locate the respondent’s position in the stratification system we used self-reported class position which ranges from 1 (low class position) to 10 (high class position). A measure of class position was deemed important as a control variable since it is likely to be related to one’s perception of citizenship as well as perceived economic and cultural threat posed by non-nationals or new immigrants.

Additional background variables include age, education (i.e., two dummy variables indicating if the individual attained only primary education or post-secondary education, with secondary education as a reference category), and religiosity (measured by the frequency of attending religious services).

6.3. Method of analysis

We employ multivariate analysis in order to examine country differences in public attitudes toward the entitlement to citizenship, while controlling for differences in the composition of the population across countries. Since the dependent variable for these analyses is a three-category variable distinguishing among preferences for assimilationist, pluralist, or exclusionary citizenship principles, we employ multinomial logit regression for modeling the relationship with various independent variables.

7. Results

We start with a short description of the distribution of responses on the citizenship entitlement variable (the dependent variable) for the 10 countries included in our study. As one can observe from [Table 1](#), the exclusionary position is the least frequent attitude expressed by respondents, with slightly over one-fifth of respondents in the combined sample preferring this to the other alternatives. The percent of respondents espousing this view ranges from 15.1% in Canada to 29.4% in Britain (with France, Israel, and Denmark following close behind). A smaller proportion of individuals in countries classified as pluralist express support for the exclusionary approach than in countries characterized as either assimilationist or exclusionary, with the exception of Germany. This finding is in line with evidence on and public perception of the prevalence of support for extreme right wing parties or movements in European countries ([Givens, 2005](#); [Kitschelt, 1995](#); [Minkenberg, 2003](#); [Norris, 2005](#); [van der Brug and Fennema, 2007](#)).

The pluralist approach and the assimilationist attitude to citizenship are rather prevalent in all countries but in some countries the public clearly prefers one attitude over the other. Over 40% of respondents in Australia, the US, and Canada gave preference to the pluralist approach, as was the case in Germany and Sweden. The assimilationist approach received preference in France, Denmark, and Austria. Israel does not fit any of the above patterns and respondents appear to be more evenly divided across the three different perceptions of entitlement to citizenship.

As noted in the previous section, individuals’ attitudes toward citizenship are deeply embedded in their perceptions of community and polity and the extent to which they feel threatened both culturally and economically by others entering

Table 1

Percentage distribution of perceived legitimate grounds for citizenship by country ($N = 9655$). Source: 2003 International Social Survey Program (ISSP) module on National Identity.

	Assimilationist ^a	Pluralist ^b	Exclusionary ^c	Total (N) ^d
Australia	36.9	46.8	16.3	100% (1315)
Austria	39.8	36.6	23.6	100% (836)
Britain	39.3	31.3	29.4	100% (786)
Canada	35.5	49.4	15.1	100% (805)
Denmark	48.4	26.7	24.9	100% (1140)
France	45.6	28.0	26.4	100% (1183)
Germany	38.1	43.2	18.7	100% (1072)
Israel (Jewish pop.)	38.3	36.7	25.0	100% (512)
Sweden	37.8	41.2	20.8	100% (956)
US	35.7	44.4	19.9	100% (1060)

^a The distinctive aspect for the assimilationist approach is the support for *jus domicile*.

^b A pluralist approach is distinctive in supporting *jus soli* while rejecting *jus domicile*.

^c Support for the exclusionary approach is distinctive in its rejection of both *jus soli* and *jus domicile*.

^d N represents the number of observations that have valid information on the dependent variable and the demographic variables.

the society. In our analysis we tap some of these perceptions and evaluate the extent to which country differences in the prevalence of such perceptions modify the country differences observed above. Before turning to a more comprehensive multivariate analysis it will be useful to examine the summaries of our independent variables across countries. These are provided in Table 2.

The figures in Table 2 are the means and standard deviations for the explanatory variables at the individual level. These are provided for each country in our sample. Close scrutiny of the figures in the table reveals that the ordering of the countries is not uniform across the various indicators. Looking at the measure of cultural threat, and recalling that a score of one reflects minimum perceived threat while a score of five indicates the highest level of threat, we find that the mean for most countries is around 3. Israel is the exception with a sample mean of 2.8. Most likely this is due to the fact that immigrants to Israel are overwhelmingly Jewish and less likely to threaten the Jewish cultural hegemony. Yet when we consider the measure of economic threat we find a relatively high mean score in the case of Israel (3.0), exceeded by Britain, Germany and Austria. Denmark has the highest mean score on the cultural threat measure (3.4) but one of the lowest scores on the economic threat measure (2.7). While the cultural threat is collective in nature, the economic threat is posed at the individual level (the extent to which one perceived a threat from newcomers to his or her livelihood). In a strong welfare state such as Denmark (or Sweden) citizens may feel rather well protected in comparison to those living a country with a more liberal market economy. Although this is not always the case, on the whole societies with a long history of immigration, such as the US, Canada, and Australia tend to have slightly lower scores on the cultural and economic threat variables as well as the opposition to globalization index.

We now turn to results from multinomial logit regression models predicting the preference for assimilationist, pluralist, or exclusionary citizenship approaches. We first estimate several competing multinomial logit models in which we evaluate various groupings of the 10 countries, reflecting different plausible theoretical citizenship regime classifications. We then select the one that best balances fit and parsimony, based on goodness-of-fit statistics. Given the large samples employed we use the BIC statistic (Raftery, 1995) as the criterion for selecting the preferred model. Goodness-of-fit statistics for various models are presented in Table 3. The top panel presents results from models including only country classifications and demographic variables, while the bottom panel presents results from models adding relevant attitude items. We distinguish between the two panels out of concern that the attitude items might not be strictly exogenous.

Four different models are estimated and presented in Table 3 in order to evaluate a range of scenarios.⁷ Comparing the fit statistics of these models allows us to evaluate hypotheses one through three. The first model doesn't enforce any classification, allowing individuals in each country to express different patterns of support for the various conditions for citizenship. This model reflects the concern, discussed above, about the inherent difficulty in classifying countries into distinct ideal-typical regimes. Model two tests the typology proposed by Castles and Miller (2003), distinguishing between pluralist, exclusionary, and assimilationist regimes. In model 2, we treat Sweden as part of the pluralist regime-type, considering its recent history.⁸ A third

⁷ A fit of an additional model, which clustered members of the exclusionary and assimilationist regimes was also evaluated. The model reflected the proposition that the process of European integration has similarly shaped the views of the public across European societies with respect to the grounds for citizenship. The model achieved a better fit than the model that assumed distinct national patterns, but fared less well than the three models testing for the clustering of responses around distinguishable regime patterns (i.e., models 2, 3, and 4). Another alternative we considered was growing convergence across advanced economies in views regarding the access to citizenship. In particular, arguments by Joppke (2007) and Soysal (1994) both posit a trend of convergence toward a more liberal view on access to citizenship. We addressed this possibility by estimating a model without any country categorization. The model's fit was worse than that of all other models we estimated.

⁸ We also tested two alternative models, where Sweden was either included in the exclusionary group or in the assimilationist group, but both models did not fit the data better than models 2 or 3.

Table 2

Means (and standard deviations) or proportions for independent variables, by country ($N = 9426$). Source: 2003 International Social Survey Program (ISSP) module on National Identity.

	Age	Subjective class location 1–10	Primary education ^a	Post-secondary education ^a	Religiosity (attend) 1–8	Cultural 1–5	Opposition to globalization 1–5	Patriotism 1–5	Economic threat 1–5	N^b
Australia	48.6 (15.8)	5.8 (1.7)	.31	.22	2.8 (2.1)	3.0 (0.8)	3.4 (0.6)	3.8 (0.6)	2.6 (0.8)	1289
Austria	45.9 (17.1)	4.9 (1.5)	.18	.10	3.6 (2.0)	3.2 (1.0)	3.3 (0.8)	3.6 (0.8)	3.1 (1.0)	826
Britain ^c	48.8 (16.9)	**	.39	.14	2.8 (1.8)	3.3 (0.8)	3.3 (0.7)	3.4 (0.7)	3.3 (0.8)	767
Canada	52.7 (14.7)	5.3 (1.5)	.05	.24	3.9 (2.7)	3.1 (0.8)	3.2 (0.6)	3.8 (0.6)	2.6 (0.8)	795
Denmark	46.3 (16.1)	6.3 (1.4)	.05	.13	2.8 (1.3)	3.4 (1.0)	3.1 (0.8)	3.6 (0.8)	2.7 (1.0)	1105
France	47.5 (16.6)	5.4 (1.7)	.18	.29	2.4 (2.0)	3.4 (1.0)	3.3 (0.8)	3.1 (0.8)	2.8 (1.1)	1121
Germany	47.7 (17.0)	5.6 (1.5)	.41	.08	2.7 (2.0)	3.1 (0.8)	3.0 (0.8)	3.0 (0.7)	3.2 (0.9)	1027
Israel (Jewish pop.)	39.5 (14.7)	6.4 (1.9)	.03	.25	3.9 (2.4)	2.8 (0.8)	3.4 (0.7)	3.5 (0.7)	3.0 (1.1)	510
Sweden	46.0 (16.4)	6.2 (1.5)	.21	.22	2.5 (1.5)	3.1 (0.8)	2.8 (0.6)	3.2 (0.7)	2.5 (0.8)	936
US	45.4 (16.2)	6.6 (1.8)	.02	.29	4.5 (2.3)	3.0 (0.7)	3.2 (0.7)	3.8 (0.6)	3.0 (0.9)	1050

^a Reference category for education is secondary education, including respondents which completed post-secondary education at institutions that do not provide a university degree.

^b N represents the number of observations that have valid information on the dependent variable, as well as the demographic and attitude variables.

^c Subjective class location was missing for Britain. Respondents from Britain were therefore assigned the grand mean on this variable.

model allows for distinct national patterns only among countries belonging to the exclusionary regime-type, in line with our discussion of the recent changes in citizenship law among some European countries. Finally, in model four we examine whether the recent changes in the citizenship structure in Germany that we discussed above find expression in public opinion toward citizenship that resembles attitude patterns in Britain and France.⁹

It is clear from both panels of Table 3 that model three has the best fit. This finding provides support for hypothesis 1, as opposed to hypotheses 2–4, and mirrors the picture depicted above portraying recent developments in citizenship laws for specific European countries. This includes recent changes in Germany, which introduced *jus soli* with some restrictions into its citizenship law. Another European country whose citizenship policy became less exclusionary is Sweden. In contrast to both countries, Denmark's citizenship law has recently grown to be more restrictive (Joppke, 2007). Thus, findings from Table 3 suggest that the cross-national classification that best describes the pattern of public support for conditions for citizenship includes only two well-defined regimes – pluralist and assimilationist – with all other countries following distinctive paths.

In Table 4 we present results from Models 3a and b, allowing us to provide additional information on cross-national differences in the support for the various conditions for citizenship. It is clear from Table 4 that, as expected, respondents from traditional settler societies (i.e., Australia, Canada, and the US, as well as Sweden) express greater support than respondents from countries with a colonial history for the pluralist approach, which emphasizes *jus soli*, over both the assimilationist and the exclusionary approaches. Another expected finding is that respondents from Austria, Germany, and Israel have a greater likelihood than respondents from former colonial empires of supporting the pluralist approach as opposed to the assimilationist approach. However, these countries unexpectedly tend to show a lower likelihood of supporting the exclusionary approach over the pluralist approach than respondents from former colonial empires. This corroborates the finding from Table 1, showing that support for both the assimilationist and the exclusionary approaches are higher in countries with colonial pasts (especially in France) than in other countries. Finally, patterns of public opinion in Denmark are very similar to the patterns in France and Britain despite marked differences in their past and in their citizenship structure.¹⁰ Table 4 also allows us to evaluate hypotheses (H5–H7) about the individual-level determinants of attitudes concerning the grounds for citizenship. Findings in Table 4 generally provide support for the research hypotheses. First, in line with hypothesis 5, we see that individuals reporting greater perceived economic or cultural threat tend to favor the exclusionary approach over the pluralist approach, as well as the pluralist approach of citizenship over the assimilationist approach. Second, we see that individuals expressing opposition to globalization tend to report greater support for the exclusionary approach as opposed to the pluralist approach (providing support for hypothesis 6). These findings suggest that individuals who feel threatened, economically or culturally, tend to view citizenship as a mechanism for social closure. Overall, cultural threat appears to be a stronger determinant than economic threat of perceived grounds for citizenship reported by respondents.

Our findings on the effect of cultural and economic threat, as well as opposition to globalization, on attitudes toward conditions to citizenship, extend the current literature on the effect of group threat on inter-group attitudes and relations (Olzak,

⁹ In addition to model 4, we tested several other models with similar implications. A first model included the pluralist regime, assimilationist regime including Germany and an exclusionary regime that excluded Germany (i.e., Austria, Denmark, and Israel). This model tested the claim that the change in the citizenship law in Germany reflects the only major change among members of the exclusionary cluster. A second model clustered the pluralist and assimilationist (including Germany) regimes, while leaving all other countries as dummies. Finally, a third model built on the second model in clustering the pluralist and assimilationist (including Germany) regimes, but also treated all other countries as exclusionary. None of these models performed better in terms of fit than model 4.

¹⁰ Patterns of support for the various models are generally and unexpectedly similar for Denmark, France, and Britain. However, respondents from Denmark also show a greater likelihood of supporting the assimilationist approach over the pluralist approach than respondents from France and Britain.

Table 3

Fit statistics for multinomial logit models predicting support for conditions for citizenship.

Model	Description	N	DF	Log likelihood	BIC
Demographics					
1a	Countries as dummies with France as a comparison group	9665	28	–10,048.11	20,353.15
2a	Assimilationist, pluralist, and exclusionary regimes	9665	14	–10,098.43	20,325.32
3a	Assimilationist and pluralist regimes, with all other countries as dummies	9665	20	–10,060.69	20,304.78
4a	Assimilationist (including Germany) and pluralist regimes, with all other countries as dummies	9665	20	–10,089.21	20,361.94
Demographics + attitudes					
1b	Countries as dummies with France as a comparison group	9426	36	–9029.76	18,388.97
2b	Assimilationist, pluralist, and exclusionary regimes	9426	22	–9081.5	18,364.32
3b	Assimilationist and pluralist regimes, with all other countries as dummies	9426	28	–9040.72	18,337.68
4b	Assimilationist (including Germany) and pluralist regimes, with all other countries as dummies	9426	28	–9057.12	18,370.48

Note: Assimilationist regime includes Britain and France.

Pluralist regime includes Australia, Canada, Sweden, and US.

Exclusionary regime includes Austria, Denmark, Germany, and Israel.

Table 4

Parameter estimates of best-fitting multinomial logit model of support for conditions for citizenship.

Independent variable	Model 3a		Model 3b	
	Assimilationist ^a	Exclusionary ^a	Assimilationist ^a	Exclusionary ^a
Country ^b				
Pluralist regime ^c	–.61*** (.06)	–.85*** (.07)	–.69*** (.07)	–.48*** (.08)
Austria	–.26** (.09)	–.43*** (.11)	–.28* (.1)	–.34** (.12)
Denmark	.22* (.09)	–.01 (.1)	.28** (.1)	.06 (.11)
Germany	–.42*** (.09)	–.83*** (.1)	–.56*** (.09)	–.61*** (.11)
Israel	–.44*** (.12)	–.31* (.13)	–.52*** (.12)	–.12 (.14)
Demographic				
Age	–.01*** (.00)	–.00 (.00)	–.005*** (.001)	–.006*** (.002)
Primary education	–.14* (.06)	.08 (.07)	.06 (.07)	–.1 (.07)
Post-secondary education	.42*** (.06)	–.34*** (.08)	.16* (.06)	.00 (.08)
Religiosity	–.00 (.00)	.00 (.00)	–.00 (.00)	.00 (.00)
Class	–.01 (.01)	–.01 (.01)	–.02 (.01)	–.00 (.02)
Attitude				
Economic threat			–.21*** (.03)	.29*** (.04)
Cultural threat			–.44*** (.03)	.52*** (.04)
Opposition to globalization			–.06 (.04)	.20*** (.05)
Patriotism			–.14*** (.04)	–.07 (.05)
Intercept	.88*** (.12)	.17 (.14)	3.42*** (.19)	–3.11*** (.33)
N	9665		9426	
Log likelihood	–10,060.69		–9040.72	

* $p < 0.05$. Two-tailed test; standard errors in parentheses.

** $p < 0.01$. Two-tailed test; standard errors in parentheses.

*** $p < 0.001$. Two-tailed test; standard errors in parentheses.

^a Reference category is support for the pluralist approach.

^b Reference group is assimilationist regime (France and Britain).

^c Pluralist regime includes Australia, Canada, Sweden, and US, whose coefficients are forced to be equal.

1992; Bobo and Hutchings, 1996; Rosenstein, 2008) and on attitudes toward immigrants (Kunovich, 2004; Quillian, 1995; Scheepers et al., 2002; Semyonov et al., 2004). Specifically, focusing on the main principles of citizenship law (i.e., *jus sanguinis*, *jus soli*, and *jus domicile*), we add a focus on the public sphere to the relational focus characterizing most of the literature on inter-group relations. The public sphere is represented in our analysis by views toward citizenship law, a factor that plays an increasingly important role in national politics (Castles and Davidson, 2000; Koopmans et al., 2005). Finally, we find that respondents reporting a higher degree of patriotism are less likely to favor the assimilationist approach compared to the pluralist approach, rendering partial support to hypothesis 7.

8. Discussion

Assuming that policies in general and citizenship law more specifically are not developed and implemented in a political vacuum, we focus in this paper on public attitudes regarding the grounds for citizenship. We contribute to the discussion on citizenship by examining cross-national differences in public attitudes regarding the entitlement to citizenship. Specifically, we provide the first cross-national assessment of public support for three dominant citizenship approaches – exclusionary, pluralist, and assimilationist. We measure the support for these approaches by constructing a new measure that combines the responses of individuals to questions assessing the degree of support for the main citizenship principles: *jus soli*, *jus sanguinis*, and *jus domicile*. This allows us to evaluate the degree of correspondence between cross-national differences in citizenship law and cross-national differences in public support for the different citizenship approaches.

Our analyses produced several notable findings. First, we identified only two regime-types that clearly and consistently reflect both citizenship laws and patterns of public opinion – the pluralist regime and the assimilationist regime. The pluralist regime (Castles and Miller, 2003) is characterized, both in policy and in public opinion, by its emphasis on the importance of *jus soli*. The assimilationist regime is typified by its acceptance of *jus domicile* alongside the two other principles (Castles and Miller, 2003), but in terms of public opinion is also unexpectedly distinguished by its high level of support for an exclusionary approach, which puts an emphasis on *jus sanguinis*. Countries previously considered as exclusionary increasingly exhibit distinctive patterns of both policy and public opinion, as well as inconsistencies between policy and public opinion (Denmark serves as a case in point).

In terms of individual factors affecting attitudes towards conditions for citizenship, our analysis reveals the importance of perceptions of threat, either economic or cultural, in shaping public opinion. Specifically, greater threat is translated into support for more restrictive citizenship policies. This finding extends the current understanding of the effects of inter-group relations from the relational-interpersonal sphere (Bobo and Hutchings, 1996; Quillian 1995; Rajman et al. 2003; Semyonov et al. 2004) to the public arena, where policy preferences are expressed.

Before concluding our discussion, we briefly mention the main limitations of our study. Perhaps the most important limitation is the cross-sectional nature of the data we use. As we mention repeatedly throughout the paper, citizenship policies changed dramatically in several of the countries we study. In addition, public opinion in some of the countries has increasingly been shaped by processes beyond the scope of the nation-state, most notably the process of European integration. Therefore, the possibility of further changes in public attitudes in the near future makes our conclusions in this study rather provisional. Another important limitation is the limited number of countries (10) included in our analysis. Our sample of countries was mainly limited by the availability of data. However, we also had countries for which data was available but in-depth information on the nature of their citizenship structure was lacking. Hence, a broader and more inclusive cross-national examination of citizenship policies, beyond western European and classical settler societies, will greatly improve the scholarly understanding of the nature of public support for different citizenship approaches.

While information on the institutional arrangements of citizenship is increasingly available (Alienikoff and Klusemeyer, 2000, 2002; Howard, 2005, 2006; Joppke, 2003; Soysal, 1994) and citizenship policy occupies an important place in national political arenas today (Castles and Davidson 2000; Koopmans et al. 2005), we currently have only limited knowledge on the contours of public opinion towards different citizenship principles and approaches. We sought to remedy this neglect by documenting the patterns of support toward the most dominant citizenships approaches. Considering the aforementioned limitations, our paper may be best understood as a first step in a research program that brings together the focus on the institutional arrangements of citizenship and the individual basis of support for citizenship policies.

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Appendix A. Citizenship regimes and dominant principles of citizenship for countries included in the study

Country	Citizenship regime ^a	Dominant principle of citizenship ^b
Australia	Pluralist	<i>Jus soli</i> as a dominant principle, while allowing for <i>jus sanguinis</i>
Austria	Exclusionary	A focus on <i>Jus sanguinis</i> , while allowing for <i>jus domicile</i> with heavy restrictions
Britain	Assimilationist	A combination of <i>jus soli</i> (conditioned on residence of parents) and <i>jus domicile</i>
Canada	Pluralist	<i>Jus soli</i> as a dominant principle, while allowing for <i>jus sanguinis</i> , and <i>jus domicile</i>
Denmark	Exclusionary	A focus on <i>Jus sanguinis</i> , while allowing for <i>jus domicile</i> with heavy restrictions
France	Assimilationist	A combination of <i>jus soli</i> (for third generation), <i>jus sanguinis</i> , and <i>jus domicile</i>
Germany	Exclusionary	<i>Jus sanguinis</i> , with a recent addition of <i>jus soli</i>
Israel	Exclusionary	<i>Jus sanguinis</i>
Sweden	Pluralist	A combination of <i>jus soli</i> , <i>jus sanguinis</i> , and <i>jus domicile</i>
US	Pluralist	<i>Jus soli</i> as a dominant principle, while allowing for <i>jus sanguinis</i> , and <i>jus domicile</i>

^a Classification of countries is based on Castles and Miller (2003).

^b Sources: Brubaker (1989, 1992), Castles and Miller (2003), Freeman (2004), Howard (2006), Joppke (1999, 2003), Kastoryano (2002), Niessen et al. (2007), Smooha (2002), Waldrauch (2006), Weil (2001) and Zappalà and Castles (2000).

Appendix B. Structure of dependent variable – legitimate grounds for citizenship

Pattern of support	Value for multinomial logit analysis	Jus soli	Jus sanguinis	Jus domicile
1	Assimilationist	Support	Support	Support
2		Objects	Objects	Support
3		Support	Objects	Support
4		Objects	Support	Support
5	Pluralist	Support	Objects	Objects
6		Support	Support	Objects
7	Exclusionary	Objects	Support	Objects
8		Objects	Objects	Objects

Appendix C. Questions used for the construction of independent variables

Variable	Wording of questions
1. Perceived economic threat ($\alpha = 0.54$)	There are different opinions about immigrants from other countries living in country _____ (by “immigrants” we mean people who come to settle in _____). How much do you agree or disagree with each of the following statements? a. Immigrants are generally good for _____ economy (reversed) b. Immigrants take jobs away from people who were born in _____
2. Perceived cultural threat ($\alpha = 0.55$)	a. It is impossible for people who do not share _____ customs and traditions to become fully _____ b. Ethnic minorities should be given government assistance to preserve their customs and traditions (reversed) c. Immigrants improve _____ society by bringing in new ideas and cultures (reversed)
3. Anti-globalization ($\alpha = 0.76$)	a. _____ should limit the import of foreign products in order to protect its national economy b. _____ should follow its own interests even if this leads to conflicts with other nations c. Foreigners should not be allowed to buy land in _____ d. _____’s television should give preference to _____ films and programs e. Large international companies are doing more and more damage to local businesses in _____ f. International organizations are taking away too much power from the _____ government g. Increased exposure to foreign films, music and books is damaging our national and local cultures
4. Patriotism ($\alpha = 0.73$)	a. I would rather be a citizen of _____ than of any other country in the world b. The world would be a better place if people from other countries were more like the _____ c. Generally speaking, _____ is a better country than most other countries d. People should always support their country, even if the country is in the wrong e. When my country does well in international sports, it makes me feel proud to be _____
5. Perceived class position	In our society there are groups that tend to be towards the top and groups that tend to be toward the bottom. Below is a scale that runs top to bottom. Where would you put yourself on this scale?

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