

The Development of a Citizenship Paradigm in the Context of the Legal Status of Children with Dual Citizenship

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Abstract. Citizenship is not a gift but a result of struggle. This view indicates that there is a tug-of-war of interests in in-law citizenship. An interesting issue in the context of contemporary citizenship is the tug of war in the interests of the legal status of children with dual citizenship. There are dimensions related to efforts to change the paradigm of the legal status of children with dual citizenship, namely the dimensions of law, politics, sovereignty, and even human rights. This research aims to examine the development of a dual citizenship paradigm for children related to their rights and obligations as citizens. This research uses a qualitative approach by examining the literature on the development of the legal status of children with dual citizenship in various parts of the world over the last 20 years and its impact on efforts to bring about dual citizenship in Indonesia. The results of the study show that the development of citizenship policies in various countries, such as in Europe, Africa, and America, is more adaptive to dual citizenship. However, countries in Asia at least apply dual citizenship for children. This situation indicates that there are differences in determining the legal status of children with dual citizenship based on ideological, economic, and historical paradigms.

Keywords: citizenship, dual citizenship, legal status

1. Introduction

National borders are no longer an impediment to interaction due to the globalization of information, commerce, education, and transportation [1,2]. This affects the escalating number of marriages between nations that are occurring virtually everywhere in the world. The most common way for couples of different nationalities to marry is through online acquaintances, followed by work friends or business friends, acquaintances while on vacation, former school or college friends, and pen buddies [3]. Citizenship identities are becoming more malleable as a result of the inexorable reality of globalization, which strengthens the issue of dual citizenship, particularly among the diaspora [4,5].

As citizenship status is an integral part of human rights, individuals must be afforded state protection[6,7]. Citizenship status provides a mutually beneficial connection between individuals and their governing body in accordance with the state's fundamental commitment to human rights. Citizenship clarifies the relationship between a person and the state, thereby ensuring legal certainty [8].

Despite a lengthy history, numerous regulations, and significant progress, there is an ongoing need to resolve citizenship concerns in Indonesia. Enhancements are necessary to

address diverse advancements in human rights matters and public discontent about citizenship concerns.

Law number 7 of 1984 concerning Ratification of the Convention Concerning the Elimination of All Forms of Discrimination Against Women explains that the state is required to give women the same rights as men to obtain, change, or maintain their citizenship and that the state is required to ensure that marriage to a foreign citizen the alteration of a husband's citizenship throughout the course of a marriage does not have any bearing on the citizenship of the wife, nor does it impose the husband's citizenship upon their children. As a consequence, Law Number 12 of 2006 concerning Citizenship has abolished all discriminatory citizenship regulations. By granting dual citizenship to children of mixed marriages between Indonesian citizens (WNI) and foreign citizens (WNA) before they reach the age of 18 and are unmarried, this law also represents a significant advance. This provision seeks to protect the liberties of minors. Prior to the passage of the law, a child born in Indonesia to an Indonesian mother who had married a foreigner was considered an immigrant. Consequently, if parents neglect to extend their child's visa or if the parents' divorce, the child will be deported to the father's country of origin.

This demonstrates that a person's legal citizenship status is a significant aspect of their demeanor, as it affects their rights and responsibilities within a country [9,10]. Dissatisfaction with citizenship rules has prompted efforts to alter citizenship rules to accommodate the interests of citizens, particularly regarding dual citizenship rules, which have become a topic of global discourse [11]. Normal political dynamics are at play in this endeavor, involving economics, security and sovereignty, human rights, and political participation.

Citizenship-related dynamics motivate social organization's pursuit of justice. It appears that social groups in Indonesia have not yet resolved their differences of opinion, so the revision of Law Number 12 of 2006 concerning Citizenship has not been implemented. In a theoretical context, it may be argued that redistribution politics and recognition politics provide diverse viewpoints when it comes to the concept of social justice. In the context of redistribution issues, progressive political claims call into question the notion of justice as a process of equitable economic and resource distribution and equal access for each individual. The redistributive justice paradigm focuses on socio-economic injustice and diverges from the approach that attributes the roots of social injustice to the uneven socio-economic structure of society [12]. On this basis, it demonstrates a variety of contemporary citizenship issues; therefore, this paper will focus on dual citizenship in children, as it involves sovereignty and human rights dilemmas.

2. Method

The present study utilizes a qualitative research approach and conducts a comprehensive literature analysis by examining scholarly works that specifically address the topic of dual citizenship in Indonesia. The journal selection criteria were based on the location of the research, specifically research examining the dilemma of instituting dual citizenship for children. Data processing consists of data presentation, data reduction, and conclusion drawing. The present study adhered to the sequential steps delineated by [13], encompassing a) the selection of a research subject, b) the investigation of relevant material, c) the determination of the research focus, d) the collecting of data, e) the preparation of data presentation; and f) the composition of the research report. The process of data analysis involves the utilization of content analysis techniques, wherein the researcher systematically examines, compares, integrates, and classifies the outcomes derived from various studies pertaining to dual citizenship. After the completion of data gathering, the subsequent step involves the analysis of the gathered data and the

subsequent formulation of a conclusion. In order to get exact and reliable outcomes throughout the process of data analysis, many procedures are utilized, which involve a thorough scrutiny of the written or printed material found inside academic publications. Content analysis is employed to examine all study findings related to the ongoing discourse on dual citizenship. The primary aim of this study analysis is to examine and discuss the research framework and aims, specifically focusing on the ongoing controversy around the concept of dual citizenship.

3. Result And Discussion

3.1. Reciprocity between State and Citizen: Historical, Juridical, Dilemmatic

The population of a country consists of all individuals who reside within its borders and are subject to its authority. Initially, a country's population consisted solely of individuals descended from a single progenitor. In this case, blood ties are the most significant criterion, but as individuals from other countries with different ancestry visit the country's territory, they eventually become citizens. Now, cohabitation also determines whether an individual is included in the definition of the population of a country [14].

Citizens and their state have a reciprocal relationship as a result of the historical conditions that led to the emergence of the state and the creation of legal status [15,16]. Every individual possesses some entitlements and obligations in relation to their country. Conversely, the obligation to ensure the safety and well-being of its populace falls with the state. The pillars of a democratic society are a state's rights and obligations, namely equality in social justice and human rights, as outlined in Pancasila's noble values. Not only is equal access to the same human rights for women expected, but also equal impact on benefits and outcomes (equality of access, equality of opportunity, and equality of outcome) [17,18].

Over a relatively extended period, a substantial number of Indonesian women who married foreign nationals (WNA) faced difficulties with regard to residence permits and infant citizenship status. The citizenship status of the infant must reflect that of the father. Therefore, in order to remain in Indonesia, parents must continuously extend the domicile status of their offspring. This cannot be separated from the provisions of Law Number 62 of 1958 concerning Citizenship, which states that the citizenship of children from mixed-married couples is determined by the nationality of the father. To remain in Indonesia, the child's residence permit must be extended. Law Number 12 of 2006 concerning Citizenship no longer regulates it. Particularly for children born to couples in mixed marriages are permitted to hold dual citizenship until they reach the age of 18 or are married. Children must choose their nationality at the age of 18 or upon marriage, whether to follow their father or mother. This is intended to secure the child's best interests. This eliminates the need for parents to obtain residence permits for their offspring [14].

Law Number 12 of 2006 concerning Citizenship only applies to dual citizenship in limited circumstances. The term 'limited' refers to the fact that dual citizenship applies only to minors and for a limited period, namely until the child reaches the age of 18, after which the child must choose between their nationalities. This law essentially disallows dual citizenship (*bipatride*) and lack of citizenship (*apatride*). Thus, they must indicate their citizenship choice.

Furthermore, apart from the restricted availability of dual citizenship for offspring of intermarriages, the child becomes subject to the jurisdiction of two nations with respect to the citizenship of both parents. This situation gives rise to legal complexities within the domain of International Private Law, specifically pertaining to the determination of which country's legislation governs the child's personal status. In accordance with Article 7 of Law Number 1 of 1974 concerning Marriage, marriage can only take place in Indonesia if the woman is sixteen

years old. If the child has dual citizenship, then the child's marriage provisions are subject to the laws of the country, both Indonesian and foreign.

A further concern is the legal position of children with dual citizenship, particularly in relation to the succession of assets bequeathed by their Indonesian nationality, father or mother. In accordance with the principles of International Private Law, the assessment of children's status and their familial ties necessitates a first examination of the marital union between their parents. In the event of the demise of one or both parents, if the kid is born within the confines of a legally recognized marriage, the child assumes the position of heir.

Based on the jurisprudence of International Private Law in the Netherlands and Indonesia, it is established that the applicable inheritance law is determined by the nationality of the testator. In the context of children born to parents of different nationalities, specifically where one parent is an Indonesian citizen, and the other parent is a foreign citizen, it is observed that in the event of the death of either parent, the children acquire the citizenship of the dead parent. This inheritance dilemma creates a problem when a child born to a foreign-born couple chooses to reside in a country other than Indonesia. Article 21, paragraph (3) of Law Number 5 of 1960 concerning Basic Agrarian Principles Regulations states that foreigners are prohibited from obtaining property rights. Because he is not an Indonesian citizen, his inheritance rights are limited. In terms of human rights, nationalism, and religion, this situation unquestionably creates a number of complications. This reality raises a number of dilemmatic questions regarding dual citizenship restrictions for children.

3.2. The Relationship between Private International Law in Dual Citizenship in Children

In the current context of globalization, achieving social justice is hampered by the aggressive penetration of neoliberal economics, which is widening the divide in global economic inequality and disparity. The pursuit of social justice within the framework of redistributive justice, which entails a fairer allocation of resources and economic opportunities, as well as the enhancement of the general welfare, assumes significant importance in the face of an unregulated market economy that is primarily motivated by private interests and lacks a public commitment [19,20].

On the other hand, recognition of the legal status of citizens is an essential component of [21]'s politics of recognition, which requires a broader consensus than recognition in affection (personal between parents and children). The law relates to the status of a "legal person," or how a person acquires rights and responsibilities as a member of a larger social community, as opposed to fundamental, private requirements. Only when confronted with the perspective of a "generalized other" who is aware of the social norms of the distribution of rights and obligations can reciprocal relationships as fellow rights holders exist [21]. This confirms that this reciprocal relationship is the result of the universalization of the interests of citizens.

This discussion contrasts with the existing international private law system in Indonesia, which is a result of the international private law system inherited from the Dutch East Indies government. This system is based on the principle of concordance. It encompasses regulations pertaining to personal status in Article 16 of the *Algemene Bepalingen Van Wetgeving* (AB), which is copied from Article 6 of the Dutch AB, which is copied from Article 3 paragraph 3 of the French Civil Code. Article 16 AB stipulates that statutory provisions pertaining to the status and authority of persons continue to obligate Indonesian citizens who are abroad.

In accordance with Article 16 AB, Indonesia adheres to the nationality or citizenship principle when determining an individual's status. It can be inferred that Indonesian residents who are residing outside the country are subject to the jurisdiction of Indonesian national law,

particularly when their personal status is under consideration. Conversely, in accordance with legal principles, foreign individuals residing within the jurisdiction of the Republic of Indonesia are subject to their respective national laws, particularly in matters pertaining to personal status. This encompasses areas such as marriage and divorce, annulment of marriages, guardianship, legal capacity to undertake legal actions, matters related to personal names, the status of minors, and other related matters. Article 16 AB is reciprocally interpreted in practice because it is a unilateral reference rule (*eenzijdige verwijzingsregels*). This contrasts with jurisdictions following the Common Law system, wherein an individual's legal standing is ascertained based on the law of their residence.

The Citizenship Law in force in Indonesia does not define the term "child", but Article 6 paragraph (1) of Law Number 12 of 2006 concerning Citizenship states that children who have dual citizenship must choose one of their nationalities after they are 18 years old or married. In accordance with the provisions of Article 6 paragraph (1) of Law Number 12 of 2006, the age limit for a child is 18 years. If a child is married off before the age of 18, for example, at the age of 17, then they are considered an adult. Article 47, paragraph (1) of Law Number 1 of 1974 concerning Marriage states that the minimum age limit for a child is 18 years. This article states that children who are not yet 18 (eighteen) years old or have never been married are under the authority of their parents as long as they are not or have not been removed from their authority.

Article 7 paragraph (1) of Law Number 1 of 1974 concerning Marriage regulates that a man must be 19 years old and a woman must be 16 years old to be able to enter into a marriage. If a girl with dual citizenship wishes to marry between the ages of 16 and 17, she must comply with the marriage requirements of whatever country she has dual citizenship in, both Indonesian laws as outlined in Law Number 1 of 1974 concerning Marriage and the law of foreign countries in Indonesia, comply with the dual citizenship he holds. The issue of dual citizenship poses a challenge within the realm of International Private Law for nations that prioritize the principle of nationality or citizenship as a basis for defining the applicable legal framework governing an individual's personal status.

Within the realm of Private International Law scholarship, a multitude of perspectives exist about the resolution of the predicament of dual citizenship encountered by nations that adhere to the notion of nationality or citizenship as a means to ascertain the applicable legal framework governing an individual's personal status. For instance, van Brakel, Hijmans, and Kusters concurred on the adoption of the principle of "*lex fori*," which refers to the application of the law of the judge's forum where the case was initiated. This approach is justified by the judge's superior familiarity with their own jurisdiction's legal framework. Makarov, Murad Ferid, and De Groot exhibit a preference for the principle of "*lex fori*" within the domain of public law while displaying a greater inclination towards the concept of "effective nationality" within the realm of private international law. It is the judge's responsibility to determine which citizenship is the most advantageous or viable for a person with dual citizenship.

A child with dual citizenship who desires to marry in the territory of the Unitary State of the Republic of Indonesia must meet the marriage conditions indicated in Law Number 1 of 1974 concerning Marriage and its implementing regulations. In the context of Indonesia, those seeking to enter into matrimony are required to inform the registration officer at the designated venue of their intended marriage in accordance with their respective religious affiliations. Such notification may be conveyed either orally or in written form by the prospective bride and groom themselves, their parents, or authorized agents.

The notification pertaining to the marriage is required to encompass essential details such as the full names, ages, religious affiliations or beliefs, employment, and places of residence of both the prospective bride and groom. In order to ascertain the ages of the prospective bride and

groom, it is essential to provide a citation from their respective birth certificates. In situations when a birth certificate or birth identification is not available, it is permissible to utilize a certificate issued by the Village or District Head, which verifies the age and origin of the individuals intending to marry. In addition to the aforementioned details concerning the prospective bride and groom, it is imperative to obtain information pertaining to their respective parents. This includes the names of the parents, their religious or philosophical affiliations, occupations, and place of residence. In the event that the potential bride and groom are domiciled in a foreign country, it is imperative that the Indonesian Representative in the respective place of residency provides certification affirming the absence of any impediments to their matrimonial union.

Consequently, if a child with dual citizenship wishes to marry in Indonesia and he is domiciled or has a permanent place of habitation in Indonesia, he is subject to Indonesian law. However, if a child with dual citizenship has a permanent overseas domicile, the infant is considered a foreigner [3].

In the context of International Private Law, a person has a habitual residence; that is, the individual actually resides in a country, which can be a home or place of employment. However, because children are adolescents or unmarried, their place of residence generally follows that of their parents; if the parent's place of residence is in Indonesia, the child's usual place of residence is also in Indonesia.

3.3. Child Citizenship and Inheritance Rights

In accordance with the principles of International Private Law, the assessment of a child's position within the parent-child relationship necessitates a first examination of the marital status of the parent. In the event that the marital union of the parents is deemed legally legitimate, it establishes a legal bond between the kid and the father. In Indonesian inheritance law, children are successors, provided that, under Islamic inheritance law, the child in question must be blood-related to his parents.

The wife was an Indonesian citizen while the husband was a foreigner in one of the cases brought to light by internet media, involving a husband and wife who were in a blended marriage. This couple has lived in Indonesia for twenty years as a married couple. The wife remained an Indonesian citizen after the marriage and died of cancer. Nevertheless, following the passing of the wife, the husband and children, who possess foreign citizenship, are unable to receive the inheritance of the residence owned by the wife and mother of the children as a result of their non-native nationality. According to the provisions of Law Number 5 of 1960 concerning Basic Agrarian Principles in Indonesia, the land must be sold within one year, and the proceeds are divided between the state and the beneficiaries.

In accordance with Law Number 5 of 1960 concerning Basic Agrarian Principles and its implementing regulations, expatriates in Indonesia are prohibited from obtaining land rights, including property rights. The introduction of dual citizenship for offspring resulting from intermarriages with an Indonesian citizen prompts inquiries on the extent to which these children, possessing dual citizenship, are able to exercise their property rights as stipulated by land law.

Since the enactment of Article 21 paragraph (1) of Law Number 5 of 1960 concerning Basic Agrarian Principles, which prohibits foreigners from obtaining ownership rights to land, and Article 21 paragraph (3) of Law Number 5 of 1960 concerning Basic Agrarian Principles, which prohibits dual citizens from obtaining ownership rights to land, moreover, according to Article 19 of Government Regulation Number 40 of 1996 concerning Business Use Rights,

Building Use Rights and Land Rights, it is stated that only Indonesian citizens are granted Building Use Rights. Usage rights are the only rights to land that can be owned by foreigners.

After the promulgation of Law Number 12 of 2006 concerning Citizenship, regulations in the agrarian sector have not changed, making it difficult for children with dual citizenship to exercise their rights, in the sense of inheriting land from an Indonesian-citizen parent. If a child with dual citizenship inherits freehold land from one of his parents, the child's rights are undoubtedly not terminated. According to the applicable regulations, he must wait until he is 18 years old and then choose to become an Indonesian citizen before he can exercise his rights. Children with dual citizenship also have the option of decreasing their rights, such as from ownership rights to use rights, although this method is rarely used in practice [22].

3.4. The Reality of Dual Citizenship in Various Countries

The legal status of dual citizenship in Indonesia exhibits variations when compared to other nations. [23] conducted a comprehensive study, collecting data from a sample of 115 nations. The findings of this study revealed that the recognition of dual citizenship has significantly increased over time. Specifically, it was observed that almost half of the countries included in the study currently acknowledge dual citizenship, although only a small number of countries did so before the 1950s. The study emphasizes geographical disparities, noting that the acceptance of dual citizenship is often lower in Asia compared to Europe and the Americas. According to [23], Asian countries, including Indonesia, exhibit a lower degree of acceptance towards dual citizenship in their legal frameworks, instead emphasizing the significance of single citizenship. The emergence of this situation can be attributed to the divergent viewpoints and dispositions held by different social collectives with regard to the concept of dual citizenship.

In addition to many societal, economic, security, and technological progressions, the adoption of dual citizenship is also advocated under specific situations. [24] asserts that the heightened global mobility has resulted in a rise in the population of persons who possess the ability to assert several nationalities from birth. This encompasses scenarios such as children who are born to parents from different nations, as well as children who are born in countries that provide citizenship based on birthright to parents who themselves have citizenship based on descent [23,25]. The expansion of gender equality has led to a shift in the inheritance of citizenship, allowing children to now acquire citizenship from both their mother and father [23,25,26]. The rise in mobility and apprehensions over diminishing national allegiance has contributed to the decrease in interstate conflict, thus fostering a heightened acceptance of dual citizenship [23,26]. In situations where the application of human rights is anticipated to encompass individuals regardless of their citizenship status, the significance of belonging to a certain political group diminishes [26,27].

The emergence of issues related to dual citizenship in discussions is influenced by the orientation of existing social organizations. According to the research conducted by [28], the recognition of dual citizenship by a state is linked to an internationally focused state identity. This means that states with fewer connections to conventional notions of nationhood are more inclined to acknowledge dual citizenship. These identities encompass countries with citizenship laws that emphasize assimilation based on ancestry, countries with dual-citizen identities resulting from colonialism, and countries closely associated with global governance. The findings suggest that dual citizenship represents a novel concept of global citizenship, which is based on belonging to an international community that surpasses traditional state boundaries.

In European countries, the immigrant factor drives the implementation of dual citizenship legal status [29,30], whereas in Indonesia, the immigrant factor does not drive the

implementation of dual citizenship legal status. In the context of the political dynamics of dual citizenship, community groups also differ between Indonesia and other countries, such as Sweden, where community groups are globalist, individualist, and multiculturalist [29]. In contrast, in Indonesia, community groups are globalist, nationalist, and primordialist. A historical perspective reveals additional differences that have implications for the application of citizenship laws in each country [31].

Based on this assertion, it can be inferred that the issue of dual citizenship in children poses a vulnerability stemming from disparities in their legal standing. Furthermore, the absence of acknowledgment of the legal status of dual citizenship serves as a contributing factor to this predicament in children. Nevertheless, the possession of dual citizenship presents a range of potential risks, encompassing economic, political, and even considerations pertaining to national sovereignty.

4. Conclusion

The increasing intensity of international migration will result in a rise in the diaspora population. This condition has a direct effect on the number of marriages between citizens, which promotes the birth of children with dual citizenship. There is a distinct paradigm regarding limited dual citizenship for children in the Indonesian context, which has led to efforts to reconsider the legal status of limited citizenship for children. Therefore, future researchers must investigate phenomenologically, from the perspective of children, the factors that influence their choice of legal status.

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