

# Same Sex Couples and Their Rights:

*An Event History Analysis of the Introduction of Same-Sex Unions and  
Adoption Rights for Same-Sex Couples in Western Europe*

---



Jeroen Romeijn  
0805254

# **Same-Sex Couples and Their Rights:**

***An Event History Analysis of the Introduction of Same-Sex Unions and Adoption Rights for Same-Sex Couples in Western Europe***

July 18, 2013

Master Thesis in Political Science

Track: Comparative and European Politics

Radboud University Nijmegen

Supervisor: Dr. A. Akkerman

Second corrector:

Student: Jeroen Romeijn

Student number: 0805254

Word Count: 33 326

## Table of Contents

Chapter 1: Introducing Same-Sex Family Policies.....	6
Chapter 2: Theoretical Framework .....	10
2.1 Introduction.....	10
2.2 National Explanations.....	12
2.4 Adoption.....	23
Chapter 3: Methodology .....	27
3.1 Introduction.....	27
3.2 Setting the Stage: What Are We Analyzing? .....	29
3.3 The Method: Event History Analysis .....	32
3.4 The Dependent Variable: the Introduction of Same-Sex Family Policies .....	34
3.5 Independent Variables .....	36
3.6 Conclusion and Limitations .....	42
Chapter 4: Results .....	43
4.1 Introduction.....	43
4.2 Descriptives, Correlations and Standardization .....	44
4.3 Same-Sex Unions .....	50
4.4 Adoption Rights for Same-Sex Couples .....	55
4.5 Conclusion .....	59
Chapter 5: Discussion .....	60
5.1 Introduction.....	60
5.2 Answers to the Sub-Questions .....	61
5.3 Answering the Main Question and Introducing a New Framework .....	64
5.4 Conclusion .....	67
Chapter 6: Conclusion .....	68
References.....	71

Appendix 1: The Introduction of Same-Sex Family Policies

Appendix 2: Code Book

### List of Figures:

Figure 1: The Recognition of LGBT Rights in Europe.....	8
Figure 4.1: Survival Curve of the Introduction of Same-Sex Unions in Western Europe.....	44

Figure 4.2: Survival Curve of the Introduction of Adoption Rights for Same-Sex Couples in Western Europe.....	45
---------------------------------------------------------------------------------------------------------------	----

#### **List of Tables:**

Table 3.1: The Introduction of Same-Sex Family Policies in Europe.....	29
Table 4.1: Descriptive Statistics of the ‘Societal Change’ Variables.....	46
Table 4.2: Descriptive Statistics of the LGBT Movement and Political Opportunity Variables.....	46
Table 4.3: Descriptive Statistics of the International Variables.....	47
Table 4.4: Correlation Table: the Model for Same-Sex Unions.....	48
Table 4.5: Correlation Table: the Model for Adoption Rights for Same-Sex Couples .....	49
Table 4.6: The Introduction of Same-Sex Unions in Western Europe between 1988 and 2010.....	51
Table 4.7: The Introduction of Adoption Rights for Same-Sex Couples in Western Europe between 1998 and 2010.....	56

## Foreword

---

As the writing of my thesis draws to a close, so does my time at the Radboud University. The five years I have spent here have thoroughly changed and deepened both my understanding of and interest in society and politics – and I hope this thesis reflects that. Over the last two years, moreover, the writing of both my bachelor and master thesis, combined with my classes during my master program, has helped me realize which issues I find most interesting: those that are related to (the reduction of) inequalities in society through policies. Of course, this thesis is a clear example of exactly such a subject, as it investigates the introduction of registered partnerships and marriage and adoption rights for same-sex couples (in Western Europe). Although my time at the Radboud University is over, my time as a student is not – as I am pursuing another Masters degree: this time not on comparative politics, but on comparative politics, and not in the Netherlands, but in Gothenburg, Sweden.

In spite of this new adventure, I will not forget the people who helped me during the process of writing my thesis and without whom the thesis presented here would not have come about. Cliché as it may be I would first like to thank my family and friends, who have both supported me and patiently listened to my enthusiastic but long-winded explanations and to the occasional complaining.

I would like to especially thank Cees van Dijk, Nienke Bos and Tobey Berriault for their help, advice and critical remarks. The same goes for Roderick Sluiter, who I would like to thank for both his advice and his assistance in finding the data I needed.

Finally – and most importantly – I would like to thank my supervisor Agnes Akkerman for her critical, inspiring and incredibly clear comments and explanations. I will not easily forget that for any thesis to work, you need to not climb on a mountain, and explain the way there from above.

I hope this thesis shows its readers (some of) the way to the introduction of same-sex family policies.

Jeroen Romeijn

August 2013

## Chapter 1: Introducing Same-Sex Family Policies

---

Even though the end of summer has not even been reached, 2013 has already been a year in which very heated debates about “gay marriage” have taken place. These debates have been held in countries as diverse as Uruguay and the United Kingdom and were probably at their fiercest in both France and the United States. In the former, the introduction of same-sex marriage and adoption rights for same-sex family couples led to massive public demonstrations and even caused a fight in the senate (BBC, 2013 a; UPI, 2013). In the United States, the Supreme Court’s decisions on the Californian ban on same-sex marriage<sup>1</sup> and the Defense of Marriage Act attracted worldwide media coverage and debate (BBC 2013 b). Ever since Denmark was the first country to introduce registered partnerships for same-sex couples in 1989 (Scherpe, 2007), many countries have introduced all kinds of policies that recognize the existence of same-sex couples and their family (Festy, 2006; Saez, 2011). Together with Iceland, Denmark was also the first country to grant same-sex couples the right to adopt stepchildren in 1999 (Baatrup & Waaldijk, 2006; Stefánsson & Eydahl, 2003). The Netherlands was the next country to make the world news when it was the first country to introduce same-sex marriage. Ever since these early introductions, policies recognizing the family rights of same-sex couples have been introduced in countries as diverse as South Africa, Canada and Argentina. (BBC, 2010).

Although these policies have spread well beyond the Western-European countries that first introduced them, Western Europe still stands out as the region that has come the longest way in the introduction of same-sex family policies. This is especially true where the recognition of relationships is concerned: all Western-European countries but Greece and Italy have now introduced some form of registered partnerships (see appendix 1).

These policies concerning the rights of same-sex couples and their families come in quite a wide array (Digoix et al. 2006), but the policies drawing most public attention are for sure those concerning two main issues: the recognition of same-sex relationships in either registered partnerships or marriage and the right of same-sex couples to adopt children. In recent years more and more scholars have been taking up the challenge to study why countries introduce such rights. So far, however, almost all academic attention has been focused on the introduction of registered partnerships and same-sex marriage (for examples, see Kollman 2007, 2009; Paternotte, 2008; Rydström, 2011). With the exception of Lax & Phillips (2009), no study has yet systematically investigated why countries (or states) introduce the right for same-sex couples to adopt children. This study seeks to expand the scope of the academic field by looking at more policies than just same-sex unions (partnerships and marriage), and also investigates the introduction of adoption rights for same-sex couples. In order to do so, this study investigates why countries introduce *same-sex family policies*. These are all policies that directly affect the opportunities of same-sex couples to have their relationships and families recognized or to form families.

The scope of this study is – moreover – limited to the introduction of these policies in Western

---

<sup>1</sup> Throughout this thesis the term “same-sex marriage” will be used to what is more precisely described as given same-sex couples access to have their relationship recognized by the state in the form of marriage.

Europe between 1988 and 2010. The main reason for limiting this study to Western Europe is that it is the only region in the world (with the possible exception of American states), for which there is enough comparable, longitudinal, cross-national data to properly study the introduction of these policies in a larger cross-national comparison. The period from 1988 has quite simply been chosen because the first same-sex family policy was introduced in 1989 – and as we will see later in this study, some of the causes of this introduction are likely to have started before 1989. The limit to 2010 has been chosen because the required data for later dates was simply not published yet. All in all, this means that the goal of this study is to establish what explains spatial patterns in the introduction of same-sex family policies in Western Europe between 1988 and 2010. This implies that the main question of this thesis is the following:

*What explains spatial patterns in the introduction of same-sex family policies in Western Europe between 1988 and 2010?*

The element of spatial patterns has been added because studies of issues like same-sex family policies have usually been concerned with either temporal or spatial patterns of the introduction of same-sex family policies (Fernández & Lutter, 2013; Sluiter, 2012). Although the two are not entirely unrelated, this study is less concerned with the temporal diffusion of these policies and rather focuses on how (and why) these policies have spread throughout Western Europe the way they have. So far, studies that have treated the same subject have been diverse – and usually only focused on a few countries, but almost all of them have made a distinction between national and international explanations of the introduction of same-sex family policies. Taking up this distinction, this study will argue that there are four main lines of explanations for the introduction of same-sex family policies that have so far been offered in the academic literature: two on the national level and two on the international level – even if many more labels have been applied.

National explanations are explanations that function at the national level or from below. Generally, they come in two kinds; They either describe broad transitional processes in society that are said to affect the introduction of same-sex family policies like secularization, modernization or changing levels of public opinion (Fernández & Lutter, 2013; Lax & Phillips, 2009). Other explanations on the national level tend to incorporate elements of social movement theory and focus on the role of the lesbian, gay, bisexual and transgender (LGBT) movement and the (political) opportunities these movements get (Smith, 2005; Paternotte, 2011; Tremblay et al., 2011).

International explanations, moreover, are those explanations that come from ‘above’ or that go from one country to the next. These generally come in two kinds as well. The first kind are explanations that are concerned with the diffusion of policies. The idea is that – much like innovations – policies tend to diffuse following certain distinct patterns (Gray, 1973; Sluiter, 2012). The second group of international explanations is offered by scholars who have in one way or another argued that the international community or international organizations have played a crucial role in putting pressure on elites – who in turn introduce same-sex family policies (Frank & McEneaney, 1997; Kollman, 2007, 2009; Paternotte & Kollman 2013).

Whilst all of these theoretical approaches to the introduction of same-sex family policies offer interesting insights, few studies have yet done a larger cross-national examination to more broadly assess these different explanations. Following the examples set by the only two studies to do take such a comparative and quantitative approach in analyzing the introduction of same-sex family policies in (Western) Europe (Fernández & Lutter, 2013; Sluiter, 2012, p. 135- 138), this study finds much of its scientific relevance in that it tries to bring together and assess the actual importance and

significance of the different explanations that have so far been offered by the quickly expanding and mainly qualitative work done on this subject. Moreover, this study is the first to systematically investigate the introduction of adoption rights for same-sex couples in Western Europe. This should not only allow us to take some step in understanding why such adoption rights are introduced, but also in understanding the degree to which different same-sex family policies are caused by different or similar processes.

Understanding why same-sex family policies are introduced is not just important to satisfy academic curiosity, however. The issue continues to spark public debate across Europe (and even in the European Parliament (2012)) and has even been said to be very divisive in some countries (BBC, 2013 a). Additionally, and more importantly, these same-sex family policies directly affect the rights (and quality of life) of large numbers of gay and lesbian people living in (and outside) the countries that are investigated in this study.

In order to answer this scientifically and socially relevant research question, this thesis is set up in the following way. After this introductory chapter, the academic work that has been done on the introduction of same-sex family policies is discussed in the theoretical chapter. From this theoretical discussion, both the sub-questions used to answer the main question in this study and the hypotheses that are used to answer these sub-questions are derived and presented. As was mentioned above, these theoretical approaches are split into two kinds: national and international explanations. Both of these are then further divided into two kinds of explanations. For the national level these are explanations that either concern broad societal changes or the strength and opportunities of the LGBT movement. At the international level the explanations are either about the diffusion of policies across countries, or about the importance of the socialization of elites in international networks (of human rights). Additionally, the theoretical chapter contains a section that assesses to what extent the explanations for the introduction of same-sex unions (marriages and partnerships) can be assumed to apply to the introduction of adoption rights. Moreover, this section is used to discuss the different kinds of same-sex family policies that can be identified and argues why this study focuses on the introduction of adoption rights and same-sex unions.

Following the theoretical chapter, the methodological chapter presents both the limitations and demarcations of this study and the methods used to test the hypotheses that were presented in the theoretical chapter. The method that has been chosen is event history analysis. This method is particularly useful for the analysis of policy introductions, as it allows for the analysis of dichotomous dependent variables. Moreover, it can deal with changes in the levels of different variables over time – which is why it has been the method of choice for many studies that follow a design similar to the design of this study (Ferández & Lutter, 2013; Sluiter, 2012; True & Mintrom, 2002). Unfortunately and spite of my best efforts, data on some of the variables under study proved to be either inaccessible or even non-existent, meaning that this study faces some serious limitations. These limitations are discussed in a separate and concluding section of the methodological chapter.

After the methodological discussion, the results of the analysis are presented in the fourth chapter. Although some first steps are made to assess the substantial and theoretical implications of these results, the main goal of this chapter to provide an overview of the results and to discuss some contra-intuitive results and problems that plagued the analysis.

The fifth chapter, the discussion, is then devoted to a more substantial interpretation of the results of the analysis. The chapter first answers the sub-questions of this study and argues that processes of secularization, modernization and the left-right composition of a government are key factors in explaining the introduction of both same-sex unions and adoption rights. Moving on and answering



the main question of this study, the chapter is used to propose a new framework that aims to deepen and better structure our understanding of the introduction of same-sex family (and other) policies.

Finally, the conclusion briefly sums up the main findings of this study and moves on to place it in a broader (scientific and to some degree societal) context. In doing so, both the generalizability of the results and the (dis)advantages of this study's methodological approach are discussed. Moreover, suggestions for future research are done.



Figure 1: The Recognition of LGBT Rights in Europe. (ILGA-Europe 2013 a)

## Chapter 2: Theoretical Framework

---

### 2.1 Introduction

Ever since Denmark introduced a registered partnership for same-sex couples in 1989, same-sex family policies have been investigated by scholars in both Europe and the United States. The first studies of same-sex family policies were written by scholars working in the field of law, who compared the different 'regimes' introduced by different countries during the 1990's (e.g. Waaldijk, 2001, 2004).

Since then, an increasing number sociologists and political scientists has started to pay attention to same-sex family policies. Although the field is rather new, it has come quite some way in explaining why countries introduce these policies. The first studies of the subject were all case studies of a very limited number of countries that were employed to tease out the causal mechanisms that explain the introduction of same-sex family policies (e.g. Calvo, 2007; Eeckhout & Paternotte, 2011; Paternotte, 2008; Rydström 2008, 2011). Only very recently two studies on Europe have been published that employ broader (quantitative) comparisons of all (Western) European countries (Fernández & Lutter, 2013 ; Sluiter, 2012, pp. 135-138).

In spite of the relative newness of the academic work being done on these issues, almost all of these studies share two common features. The first is that they all draw on different theories (used by scholars in other fields) to explain the introduction of same-sex family policies. The second is that almost all of the explanations put forward by these different theories are located on two levels: either the national or the international level.

Explanations on the national (or internal) level are those explanations that work on the national level or 'from below'. Scholars employing these kinds of theories draw on theories like social movement theory (e.g. Calvo, 2007; Haider-Markel & Meier, 1996) or Inglehart's modernization theory (Fernández & Lutter, 2013), to argue that the strength of the gay and lesbian movement, the degree of secularization or the left-right composition of a country's government can explain whether or not a same-sex policy is introduced in a country (e.g. Fernández & Lutter, 2013; Paternotte, 2008; Sluiter, 2012 ).

Scholars who employ explanations on the international (or external) level argue that countries introduce same-sex family policies for reasons that come from (or through) other states or international organizations. Broadly speaking, these scholars follow two lines of explanations. The first line focuses on diffusion and is based on the idea that policy makers look abroad to find policies to introduce: meaning that the introduction of a policy in similar or geographically close country, tends to increase the chance of the introduction of a policy in a country (Haider-Markel, 2001; Sluiter, 2012, pp. 136-137). The second line argues that elites (politicians and members of social movements) are 'socialized' in international institutions and organizations and that these pressures and/or this diffusion of (pro-gay) norms tend to increase the chance that a same-sex family policy is adopted in a country. (e.g. Fernández & Lutter, 2013; Kollman, 2007, 2009, Paternotte & Kollman, 2012; Kuhar, 2011 a,b)

The first and very recent studies on the introduction of same-sex family policies in Europe that encompass (quantitative) comparisons of larger numbers of countries, suggest that a combination of

these two kinds of explanations is in fact the most promising approach for explaining the introduction of same-sex family policies (Fernández & Lutter, 2013). Although this may be the case, the mechanisms that have so far been employed at both the national and international level are still all 'borrowed' ideas from various theories that do not necessarily complement one another or even assume the same things. That is why this theoretical chapter is used to present and discuss the theories (and their assumptions) on both the national and international level. Sub questions and hypotheses concerning most of these explanations are derived from this discussion. Additionally, the chapter presents a two-level model that hopes to further disentangle the different theories on both the national and international level.

Moreover, almost all of these studies have – so far – only focused on the introduction of same-sex unions (registered partnerships and marriages) and almost completely sidestepped the issue of the right to adopt children for same-sex couples. That is why this theoretical chapter will present a separate paragraph that discusses the issue of adoption and reflects on the degree to which it may be expected to be caused by the same mechanisms as registered partnerships for same sex couples and same-sex marriages.

All in all, this means that this chapter is structured as follows: after this introduction, the different national level explanations and the theories they are 'borrowed' from are discussed and corresponding sub questions and hypotheses are derived from this. The chapter then proceeds by discussing the two main kinds of international explanations that have so far been put forward by the literature and once again presents corresponding sub-questions and hypotheses. After the presentation of these explanations, a separate paragraph is dedicated to the issue of adoption by same-sex couples. The end of the chapter is then used to repeat the sub-questions and to provide a summary and some reflections on the chapter, in order to disentangle and test these different explanations at both the internal and external level – and ultimately better explain spatial patterns in the introduction of same-sex family policies in Europe.

## 2.2 National Explanations

This paragraph discusses the different explanations on the national level and the theories they have been derived from. It starts with the discussion of scholars who argue that to ‘public opinion’ on gay issues has an important explanatory value and integrates this discussion with the studies that argue that that processes of secularization and modernization explain the introduction of same-sex family policies. Secondly, it discusses explanations concerning the level of urbanization in a country, the strength of social movements (and their opportunities), the left-right composition of a government and the strength and nature of forces opposing the introduction of same-sex family policies. It then reflects upon several other – more discourse related – explanations that have been used in the literature. For most of these theories, sub-questions and hypotheses are presented that the empirical study in this thesis will further address.

### *2.2.1. Public opinion, secularization and modernization*

A substantial number of studies on American states have found that a positive public opinion (either in the form of general attitudes towards homosexuality or in the form of support for specific policies), is related with an increased chance that a state introduces a same-sex marriage (Lax & Phillips, 2009; Lewis & Seong Soo Oh, 2008). The causal mechanism that is said to explain this correlation, is called the ‘electoral link’: especially when issues like gay right are discussed (which attract a large amount of attention from voters), politicians want to implement popular policies as they feel such policies will increase the chance they will be re-elected: meaning that the more popular a policy is, the more likely it is that it will be introduced in a country (Lax & Phillips, 2008). A second –related – explanation is the level of secularization, which is said to increase the chance a country introduces a same-sex family policy. The idea is that religious people tend to be more negative towards homosexuality (and same-sex family policies) – which implies that the more secularized a country’s population is, the more likely it is to introduce a same-sex family policy. (Corrales & Pecheny, 2013; Fernández & Lutter, 2013).

Some studies on the United States have in fact tried to map the causes of the public’s opinions of same-sex family policies and have generally found that people’s opinions on gay issues are shaped by underlying or ‘core’ values or beliefs (Brewer, 2008; Craig et al., 2005) or tried to establish whether the media matter (Lee & Hicks, 2011). Although such studies tend to look in promising directions, Fernández and Lutter (2013) have recently tapped into an intensively researched theory that could more systematically explain the societal changes that underlie shifts in public opinion and secularization: Inglehart’s (2008) theory of modernization. The argument here is that as societies become more affluent – and people’s socio-economic situations become more secure- the public’s attention shifts from more material (economic) issues to more postmodern issues such as the environment and women’s and gay rights (Ibid;). Moreover – and more importantly, this process is also said to increase secularization and the level of support for such post-modern issues. (Fernández & Lutter, 2013) Since (at least in democratic systems) politicians are said to seek the implementation of measures that are popular with the public (as politicians seek re-election), increased levels of modernization should increase the chance a country introduces a same-sex family policy. Fernández and Lutter’s (2013) study on the introduction of same-sex family policies in Europe does in fact suggest that modernization theory can significantly explain the introduction of registered partnerships for same-sex couples in Europe, even though they do not take public opinion into

account as a variable.

All in all then, this suggests that three possible mechanisms could be at work. The first is that (for some unexplained reason) public opinion has become more tolerant towards homosexuality in general and same-sex family policies in particular, which can explain the introduction of same-sex family policies. The second is that as countries become more secular, the strength of religious opposition to the introduction of same-sex family policies decreases, which means that the more secular a country is, the more likely it is to introduce a same-sex family policy.

The third possible explanation is offered by modernization theory: as people become more socially secure, they start paying more attention to post-modern issues, meaning that a country is more likely to introduce a same-sex family policy.

This leads to the following three sub-questions and corresponding hypotheses:

*Sub-Question 1 A. Can shifts in public opinion explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Hypothesis 1A: The higher the level of public support for same-sex policies in a country, the higher the chance it introduces a same-sex family policy.*

*Sub-Question 1 B. Can shifts in the level of secularization of a country explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Hypothesis 1B: The higher the level of secularization in a country, the higher the chance it introduces a same-sex family policy*

*Sub-Question 1. C. Can shifts in the level of modernization of a country explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Hypothesis 1C: The higher the level of modernization in a country, the higher the chance it introduces a same-sex family policy.*

### **2.2.2. Urbanization**

A second theory that follows a somewhat similar logic is that of urbanization. Scholars working on the United States have argued that the more urbanized a state is, the more likely it is to introduce anti-discrimination ordinances (Wald et al., 1996). The idea explaining this link is that, because urban environments have more diverse populations and lifestyles, city-dwellers tend to be more open-minded towards these different lifestyles - and thus homosexuality, which increases support for the introduction of anti-discrimination ordinances (Ibid). The theory is not too clear on how these positive attitudes then lead to an increased chance of the introduction of same-sex family policies, but the 'electoral link' argument may well apply here too: the idea that politicians seek to introduce popular policies, because they feel that the introduction of popular policies increases their chance of being re-elected (Lax & Phillips, 2009).

Although its logic is similar to the argument behind the influence of public opinion/secularization and modernization, the 'drive' that is said to cause shifts in attitudes towards same-sex family policies is

different: in modernization theory it is the socio-economic security of a population; in urbanization theory it is the degree to which this population lives in cities. This means that urbanization theory offers a distinct explanation from modernization, secularization and public opinion leading to the following sub-question:

*Sub-Question 1D: Can the level of urbanization of a country explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Hypothesis 1D: The higher the level of urbanization in a country, the higher the chance it introduces a same-sex family policy.*

### **2.2.3. Social movements and political opportunities**

The field of social movement theory is broad, widely researched and spearheaded by the work of Sidney Tarrow and Charles Tilly (McAdam et al, 2003; Tarrow, 1994). This 'theory' tries to capture the complex dynamics behind social movements (and the societal changes they are thought to create). Moreover it is based on the idea that the political system is incredibly porous and hard to 'pin down' – because activists and members of social movements can be part of governments (or parliaments or other governmental organizations), it becomes hard (if not impossible) to fully separate the two. Additionally, the theory argues that the degree to which a social movement is successful in realizing its aims is based on a great many different factors, ranging from the kinds of internal organization and the (effective) employment of its means (Tarrow, 1994, p. 119 – 139) to the receptiveness or openness of the political system to a social movement's demands (Paternotte, 2011) This plentitude of possible causes and influences has led to the criticism that this theory can hardly be tested empirically, as the causal claims the theory makes are too hard to disentangle.

Some of these difficulties can be avoided, however, since only a specific kind of social movements seems relevant for the explanation of the introduction of same-sex family policies: Lesbian, Gay, Bisexual and Transexual (LGBT) movement. Academic work on this movement is scarce, but there is one seminal work on the gay and lesbian movement that has been edited by Tremblay et al. (2011). Their edited volume – bringing together qualitative contributions on the 'gay and lesbian movement and the state' in a fair number of countries shows that there is a fair amount of diversity among different gay and lesbian movements around the globe (Ibid, p. 2). Moreover, they argue that the relationship between the gay and lesbian movement and the state is much more dynamic and less antagonistic than is usually assumed (Ibid, p. 225).

In spite of the diversity of gay and lesbian movements that can be identified (Holzhacker, 2012), scholars (working on the United States) have generally assumed that the most important factor determining whether or not the gay and lesbian movement(s) in a state/country can influence decisions on the introduction of same-sex family policies, is their organizational strength (Haider-Markel & Meier, 1996 ; Wald, et al, 1996 ; Fernández & Lutter, 2013). The idea is that a gay and lesbian movement that has more members and/or financial means will be more effective in campaigning for the introduction of same-sex family policies – thus increasing the chance a country introduces a same-sex family policy (Ibidem). The results of these studies have been somewhat mixed, although most studies do indeed find that the strength of the gay and lesbian movement has a significant impact on the chance a country (or state) introduces a same-sex family policy (Ibid). It should be noted, however, that most – with the exception of Haider-Markel & Meier (1996) and Wald et al. (1996) - studies using the strength of the gay and lesbian movement, have been plagued

by a lack of comparable data, meaning their tests are not too solid (Fernández & Lutter, 2013). The fact that most authors that have tested these kinds of explanations do find positive results (ibid) , and the importance attributed to the influence of the gay and lesbian movement in more qualitative country-specific accounts of the introduction of same-sex family policies (Calvo, 2007; Calvo & Trujillo, 2004; Eeckhout & Paternotte, 2011; Holzhacker, 2012; Paternotte, 2008; Rydström 2008, 2011; Tremblay et. al, 2011) does suggest that the strength of the gay and lesbian movement plays a role in the introduction of same-sex family policies. This leads to the following sub-question:

*Sub Question 2 A: Can the strength of the gay and lesbian movement in a country explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Hypothesis 2 A: The stronger the gay and lesbian movement in a country, the higher the chance it introduces a same-sex family policy.*

Only taking into account the strength of the gay and lesbian movement, however, fails to capture the much more complex dynamics through which social movement theory says the influence of social movements can function (Tarrow, 1994; Tremblay et al., 2011). Although the theory features many complex dimensions, one of its most prominent concepts is that of *(political) opportunity structures* (Tarrow, 1994, pp. 167 – 169, 175 – 178). The main argument is that that social movements need to find ways in which they can make their claims heard by or in the political system. Some political systems are said to be more receptive to such claims than others. This means that it is not only the strength of the social movement itself that determines its success, but also the degree to which it gets the opportunity to use this organizational strength in the political sphere.

Scholars working on same-sex issues have argued that these structures are of great importance in determining the successes of gay and lesbian movements. Paternotte (2011), for one, has claimed that the consociational political culture in Belgium means that its government was unusually receptive to claims from what is an otherwise rather weak and segregated gay and lesbian movement. All this suggests, that in order to more fully capture the dynamics of social movement theory, the following question should be considered:

*Sub-Question 2 B: Can the presence of political opportunity structures explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Hypothesis 2 B: The more political opportunities there are for the gay and lesbian movement in a country, the higher the chance it introduces a same-sex family policy.*

#### **2.2.5. The composition of a government**

Several authors have argued that the composition of a government is an important factor that affects whether or not a country introduces a same-sex family policy (Fernández & Lutter, 2013; Sluiter, 2012). The explanation behind this is that left wing and liberal parties tend to be more inclined to introduce same-sex family policies than right wing and conservative parties (Fernández & Lutter, 2013). The results of studies that take this explanation into account are quite convincing and have even led some scholars to claim that any study trying to explain the introduction of same-sex unions should consider the composition of government (ibid.), but as an explanation it lacks a theoretical background. Government composition can, however, be integrated into the social movement theory



quite easily by treating the composition of a government as an opportunity structure for social movements: a more progressive party that dominates a government is more likely to listen to claims made by the gay and lesbian movement, than a conservative party – thus increasing the likelihood a same-sex family policy is introduced in a country. That is why – in a somewhat similar vein as Fernández and Lutter (2013)- in this thesis the composition of a government is treated as part of the operationalization of “political opportunities”, rather than as a theory that in itself explains why countries introduce same-sex family policies. The separate treatment of the explanation in several studies (Ibid; Sluiter, 2012), however, justifies this brief – separate – discussion in this theoretical chapter.<sup>2</sup>

#### *2.2.6. Opposition to the introduction of same-sex family policies*

Very little academic work has been done on forces that oppose the introduction of same-sex family policies. This is surprising, given the importance that some scholars have attributed to them and their (recent) visibility in the debates on same-sex family policies in – among others- France, Portugal and the United States (Fassin, 2001; Huffington Post, 2013; Independent, 2013; Plataforma Ciudadania Casamento, 2010). To my knowledge the only comprehensive study that has so far been conducted on groups opposing same-sex family policies is done by Green (2013), who has mapped these forces in the United States. In his article he argues that groups opposing the introduction of same sex family policies tend to mainly be right-wing evangelical Christians that use means of direct democracy and legal challenges to stop or repeal the introduction of same-sex family policies. Almost all of the tactics and groups he describes, however, do not have comparable European counterparts – making for very hard comparison.

Of course, this is not to say that the strength of the opposition to same-sex family policies does not influence the chance of their introduction, but rather that we lack systematic studies that investigate the strength of such forces or organizations. One country that may make for particularly interesting study is Italy, since (with Greece) it is the only Western-European country that has not introduced a registered partnership law for same-sex couples (Fernández & Lutter, 2013; Saez, 2011) – suggesting that the opposition to same-sex family policies may be exceptionally strong there.

For this study, however, the focus will remain with more general concepts of possible opposition: especially the explanation offered by secularization suggests that same-sex family policies are introduced faster in countries where religious (oppositional) forces are absent. The same could in fact be argued for explanations that take the composition of a government into account: as the dominance of government by a right-wing or conservative party (oppositional forces), is thought to decrease the chance that a country introduces same-sex family policies. These are – of course – rather crude ways to deal with the possible strength of the opposition against the introduction of same-sex family policies, but for the time being we lack more systematic theoretical accounts to further investigate opposition in this thesis.

#### *2.2.7. Other explanations: discourses and country-specific explanations*

Over the last decade, the number of studies that investigate the introduction of same-sex family policies in Europe has been increasing dramatically. As I have argued before, however, it was not

---

<sup>2</sup> Although some authors (Fernández & Lutter, 2013) have sometimes mentioned the left-right composition of government as part of the political opportunity structure, no study has *systematically* integrated the explanation into social movement theory



until very recently that two cross-national studies comparing larger numbers of countries were published (Fernández & Lutter, 2013; Sluiter, 2012). Whilst I find these studies the most comprehensive accounts of the introduction of same-sex family policies to date, other qualitative studies on smaller numbers of countries have provided intriguing and relevant insights that – although they are hard to test in cross-national studies – are worth remarking upon.

One such finding claims that gay and lesbian movements have been able to influence the debate on same-sex family policies in more subtle (but important) ways than those mentioned above. Some scholars have argued that it was not until recently that the recognition of same-sex family rights was framed in a discourse of human rights: this discourse is said to have increased the legitimacy of the claims made by gay and lesbian movements, thus paving the way for the rapid Europe-wide introduction of all kinds of same-sex family policies that has marked the last two decades (Holzhacker, 2011; Kuhar, 2011a, b).

Another factor that has been put forward in some studies is the importance of the AIDS-crisis in the 1980s. The fact that many partners in same-sex couples found themselves unable make arrangements to provide for their partner after they fell ill, or even the fact that hospital visiting rights were reserved to the families of gay men who had aids (meaning families could bar gay men from visiting their partner in hospital), are said to have put the legal recognition of same-sex couples at the top of the agenda of gay and lesbian movements; during earlier decades, these movements are said to have (sometimes) been critical of the entire institution of marriage or even monogamous relationships, meaning that their support for registered partnerships and same-sex marriages was far from self-evident (Paternotte, 2008, p. 45; Rydström, 2011, p. 72).

Several other studies have suggested that issues of national identity and the role the family plays in a discourse shaping these identities, can have a strong impact on receptiveness of a society to the claims of the gay and lesbian movement. These studies tend to point at countries that have rather recently made a transition from authoritarian to democratic regimes. Scholars working on Argentina have argued that during these countries' recent transitions do democracy, the respect for (sexual) minorities became part of their newly found national identity, which is said to explain their roles as (regional) forerunners in the introduction of same-sex family policies (Diez, 2011). The same has been suggested – although not empirically studied – about South Africa, of which it is said that because gays and lesbians were treated poorly during the apartheid regime, the constitution was set up in such a way that it would treat this group (of former victims) well to the point that it paved the way to the country's introduction of same-sex marriage in 2006 (Croucher, 2011). A book chapter by Chetaille (2011) that considers the case of Poland paints a very different picture, however. She argues that as Poland emerged from Soviet rule during the nineties, a (new) national discourse and identity were shaped that were not focused (primarily) on democratic values: rather, a nationalist and catholic discourse was created that attributed great importance to the nuclear family. This discourse and the corresponding ideas about family values that accompany it are said to have created a force blocking the introduction of same-sex family policies, that is so strong that even Poland's 2004 accession to the European Union did little to change it (Ibid.)

Although these are all intriguing and plausible accounts and explanations, this thesis cannot test or empirically investigate them, mainly because their attention to discourses, context and causal complexity means that their testing requires rather different methods than those needed to test the mechanisms described above (such as modernization theory or social movement theory). The case studies that are discussed here, however, suggest that these factors may in fact hold important explanations and lessons that do deserve further academic attention and more systematic (cross

national) empirical study.

## 2.3 International Explanations

This paragraph discusses the different international theories that scholars have used to explain the introduction of same-sex family policies. Although these explanations have drawn from a large and diverse field of different theories, I will argue that they all seem to be based on two competing international explanations of the introduction of same sex family policies. The first of these is (moral) policy diffusion; the second concerns the socialization of elites in international networks – that I will argue to be best captured by world society theory. This section first discusses the literature on policy diffusion and then discusses the wide range of theories that has so far been used to capture the socialization of elites in international networks.

### 2.3.1. *Policy diffusion and morality issues*

Quite some authors – especially those working on the United States – have drawn on theories of policy diffusion to explain why countries (or American States) introduce same-sex family policies or other gay rights (Haider Markel, 2001; Haider-Markel et al., 2007; Haider-Markel & Meier, 1996, 2003; Wald, Button & Rienzo, 1996). The theory of policy diffusion finds its origins in academic work on the diffusion of innovations by Walker (1969). The general argument of policy diffusion theory is that once a policy has been successfully implemented in a state or country, it has a tendency to spread to other states: the diffusion of a policy (Ibid; Gray, 1973). Although this approach has been criticized for lacking a strong causal account of the mechanisms explaining this diffusion (Braun & Gilardi, 2006), the logic that is usually said to drive this diffusion is the following: policy makers (who are the central actor in the theory) have limited time and means to come up with and implement policies. That is why they look at (or learn about) other (comparable) legislatures and ‘find’ policies that they (can) then introduce themselves. This then leads to the spread of these policies, once they have initially been introduced somewhere. (Mooney, 2001; Walker, 1969). This diffusion is generally said to occur in two dimensions: time and space (Sluiter, 2012, p. 79, 99).

The general assumption concerning diffusion in time is that the number of countries that introduces a given policy follows an s-curve: with few countries introducing a policy at first. These countries are then followed by a large number of countries, quickly increasing the number of countries that introduces the policy, after which is number stays more or less stable – creating an s-curve (Sluiter, 2012, p. 83-85 ). Some scholars have argued that some highly salient policies concerning morality issues (of which same-sex family policies are an example) may in fact follow a different pattern: they are said to quickly be adopted by a large number of countries at first, which then stabilizes, creating a so called r-curve (Ibid.). This different pattern is argued to occur, because with policies that get so much attention in the public debate, policy makers are reluctant to wait and see how the new policy works in practice – which explains the large number of initial introductions. The only study to systematically test these assertions for a same-sex family policy in Europe found a linear diffusion pattern in time, however (Sluiter, 2012, p. 127). Paternotte and Kollman (2013), on the other hand, suggest that the introduction of same-sex family policies in Europe might in fact follow an s-curve. The present thesis, is only focused on explaining patterns in the diffusion same-sex family policies in space, however, mainly due to the limited space and time available to the author. One of the first authors to argue that policies may diffuse across legislatures was Grey (1973), who argued that since policy makers have limited time and means, they look at geographically close states in order to find policies to adopt. This means that policies tend to diffuse from one neighboring (or close by) legislature to the next: leading to a pattern that can be compared to a slowly expanding oil-

spill. The only study that systematically examines the geographical diffusion of a same-sex family policy in Europe did in fact find that countries are more likely to introduce a same-sex family policy once it has been introduced in a neighboring country – although the variables capturing this mechanism, added little explanatory value (Sluiter, 2012, p. 153 ). A study on diffusion in the United States, moreover, did not find any evidence of geographical diffusion, either (Haider-Markel, 2001). Since the work of Grey, however, a large body of work has shown that different policies tend to spread following somewhat different patterns. Recently, authors working on the diffusion of economic policies have argued that more attention should be paid to other than just geographic channels for diffusion. They argue that countries that are similar to each other (but not necessarily geographically close) are more inclined to take over each other's policies. (Beck et al., 2006) The idea behind this is probably that policy makers will not only look at countries that are geographically close, but also at countries that they perceive politically or culturally related to their own country. Although some qualitative work has argued that this is what happened in Argentina (with policy makers focusing on Spain as a culturally related country) concerning the introduction of same-sex marriage (University of San Francisco, 2009; Friedman, 2012), the only large-n cross-national comparison of European countries that looked at this kind of diffusion did not find any diffusion of same-sex family policies along countries that shared a religious background, linguistic background, or similar welfare-state regime (Sluiter, 2012, p. 153). Theoretically, there seem good reasons to expect such non-geographic diffusion of same-sex family policies. These reasons are provided by a sub-field of scholars working on policy diffusion, who argue that 'morality policies' follow distinct diffusion patterns. These 'morality policies' share a number of characteristics: they are highly salient and usually concern fairly easy to comprehend moral issues, that one can either be for or against (Mooney & Lee, 1999). These features are thought to influence the spatial diffusion of morality policies in an important way: because the public finds them so important (salient), the knowledge of introduction of such a policy in any country is likely to spread very quickly and beyond regional borders. This high salience (and probably, related media coverage) means that the geographic diffusion of same-sex family policies should become less likely. Rather, it is deemed likely that countries that are similar in some ways are more likely to adopt each other's morality policies – of which same-sex family policies are an example. (Sluiter, 2012, p. 135-138) The empirical evidence of the existence of distinct patterns of the diffusion of morality politics is, however, mixed at best. The only (and extensive) study to systematically address these patterns for Europe, does not find such patterns for the introduction of same-sex unions (Sluiter, 2012, p. 153). Although the evidence for the existence of these patterns of diffusion is rather mixed, the theory of diffusion remains under-researched in Europe. Moreover, for this theory to hold, it *should* explain the patterns of the introduction of same-sex family policies in Europe. To see whether this is the case and at the same time further establish whether or not the morality-policy argument can be of help in explaining the introduction of same-sex family policies, the following two questions are of importance:

*Sub-Question 3 A: Can policy diffusion along geographical lines explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Hypothesis 3 A: If a country introduces a same-sex family policy, the chance a geographically close country introduces a same-sex family policy increases.*

*Sub-Question 3 B: Can policy diffusion along similar countries explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Hypothesis 3 B: If a country introduces a same-sex family policy, the chance a similar country introduces a same-sex family policy increases.*

### **2.3.2. Norms, socialization, Europeanization and world society theory**

Scholars who have (mainly) focused on the introduction of same-sex family policies in Europe, have taken a different approach when trying to explain the patterns of the introduction of same-sex family policies. Generally, these scholars have departed from the observation that the introduction of registered partnerships constitutes a remarkable case of what is called ‘policy convergence’: with all Western-European countries (except for Greece and Italy) having introduced such policies over the course of the last two decades (Fernández & Lutter, 2013; Paternotte & Kollman, 2013). Usually relying on evidence from interviews with politicians and gay and lesbian activists, these scholars have argued that there are international networks of politicians and activists that tend to foster respect for human rights norms (in this sense seen to include gay and lesbian rights) among these ‘elites’ (Fernández & Lutter, 2013; Friedman, 2012; Kollman 2007, 2009; Kollman & Paternotte, forthcoming). Authors following this line of argument have drawn from several – related- theoretical backgrounds. The first of which are theories of international norm diffusion, as formulated by Finnemore and Sikkink (1998) or Risse, Ropp and Sikkink (1999). The general idea behind these theories is that after a country has introduced a norm, other countries will slowly follow – at some point, however, these norms become institutionalized and a norm cascade takes place, in which more and more countries start adopting the norm. Increasingly, international pressure is exerted over countries that do not comply with the norm, until only a few ‘deviant’ countries are left. Of course, not every norm reaches this final stage – and the introduction of same sex family policies surely hasn’t – these theories have been used to first map the international mechanisms that could explain the introduction of same-sex family policies (in Europe) (Kollman, 2007: 2009).

A second – related – approach is more Europe-centered and uses explanations from Europeanization theory. This theory claims that the European countries tend to become more alike because of two processes relating to their shared international cooperation. The first process is called ‘vertical’ Europeanization, in which countries adopt or ‘download’ standards (or more stringent legal requirements) set at the level of the European Union. This process can also work the other way around – in which case a policy or standard of an EU-member state is adopted at the European Union level: uploading. (Kuhar, 2011 a,b; Major 2005). The European Union, however, has no legal provisions that require any state to introduce any kind of same-sex family policy, making ‘vertical’ Europeanization an unlikely candidate for explaining the introduction of same-sex family policies (Kollman, 2007). The theory stipulates a second kind of Europeanization, however, which is called horizontal Europeanization. Horizontal Europeanization encompasses a process in which member states adopt policies directly from other states – thus encouraging a process in which European countries introduce increasingly similar policies. These horizontal exchanges do not just encompass policies, however, but are also said to work through networks of politicians and activists who – due to exchanges in Europe-wide networks – have a tendency to exchange and adopt each other’s norms and values (Kuhar, 2001a b). This process may explain the rapid spread of registered partnerships for same-sex couples in Europe. It should be mentioned, however, that none of these studies (on same-sex family policies) has examined non-European countries, meaning that it has not yet been possible

to determine whether this really is a typically European phenomenon – a caveat this study on Europe cannot address. A case study of the introduction of same-sex marriage in Argentina that documents the intense exchanges between Spain and Argentina, does seem to suggest that this process extends well beyond the European borders (Friedman, 2012).

Both of the explanations mentioned above share the feature that there is some conception of ‘elites’ that are socialized in the international arena, in such a way that they push for the introduction of same-sex family policies in their respective countries. Although there is some variation, these theories all seem to use different terms to describe rather similar empirical processes. Recently, an article by Fernandez and Lutter (2013) has proposed yet another, but similar theory to address these processes: world society theory.

This theory – which finds its root in studies on globalization – argues that in an increasingly internationalized world, *“many features of the contemporary nation-state derive from worldwide models constructed and propagated through global cultural and associational processes”* (Meyer et al., 1997, pp. 144-145). Attention to human rights (discourse) is said to be one of the most important parts of this “world society”. This world society is ever more integrated through networks of international organizations (Beckfield, 2010). The theory claims that human rights norms (of which gay rights are said to be an example in the theory (Frank & McEneaney, 1999; Meyer et al., 1997, p. 160) spread through these networks of international organizations (ibid). Following this logic, the assertion is that the more a country is integrated into this ‘world society’, the more likely it is to introduce same-sex family policies. In their large-n, cross-national study of 29 European countries, Lutter and Fernandez (2013) do indeed find evidence that the more integrated a country is in world society, the more likely it is to introduce a registered partnership for same-sex couples. Although the theory is not very clear on how exactly this spread of norms takes place, the described process is probably closely related to the networks of politicians and activists that are identified by the Europeanization literature.

With this discussion, I wish to make two main points about these kinds of explanations. The first is that many scholars have used very similar theories to explain the introduction of same-sex family policies and that they have mainly been using different labels to describe the same thing. The second is that – given the number of studies that have been done into these kinds of explanations – it is one of the most debated and (potentially) important explanations of patterns in the introduction of same-sex family policies.

This thesis will use the terms introduced by world society theory (over those proposed by Europeanization or international norm diffusion theories), for two reasons. In the first place, because it taps into a highly developed field of empirical studies – meaning that data and methods for the empirical study of the phenomena it describes are plentiful and well developed. The second –related – reason is that the first large cross-national comparison of the introduction of a same-sex family policy in Europe has in fact successfully applied world society theory to test these mechanisms and this study hopes to further contribute to the valuable work done by Fernandez and Lutter (2013). All in all, then, this leads to the following sub-question:

*Sub-Question 4: Can a country’s integration into world society explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Hypothesis 4: The more integrated a country is into the world society, the higher the chance it introduces a same-sex family policy.*

## 2.4 Adoption

Since there has been a serious lack of academic attention for the introduction of adoption rights for same sex couples, this section is used to address the issue separately. The section will be used to first discuss the different ways in which policies can allow same-sex couples to adopt and raise children and then focus on the policies of stepchild and joint adoption that have so far been introduced in different countries. The few academic studies that have at least mentioned the issue of adoption will be briefly presented. Subsequently, the remainder of this section is devoted to a discussion of the extent to which the theoretical approaches discussed above can be applied to the issue of same-sex family policies.

Usually, when people think of the ability of same-sex couples to raise children, the issue of adoption rights is the one that features most prominently in both the public debate (Wald et al., 1996) and in activist claims for family rights. Same-sex couples can obtain access to adoption rights in three ways. The first is single-parent adoption, in which only one person can adopt a child (thus meaning that no legal bond is established between the one member of the same-sex couple and the child). The second is stepchild adoption, in which a (registered) same-sex partner is allowed to adopt the biological child of his/her partner. The third and most extensive kind of adoption rights is formed by joint adoption, in which a same-sex couple can jointly adopt children (Digoix et al., 2006).

It should be noted, however, that this attention for adoption rights could betray a bias towards the interests of gay men in both the gay and lesbian movement and in the public debate. For lesbian couples, access to reproductive technologies and the recognition of the parenthood of both parents when a child is born are at least as (if not more) important issues when it comes to the opportunities for same-sex couples to adopt children. Moreover, there are some other rights and characteristics of policies that could qualify them as same-sex family policies (for an overview of these, see Digoix et al., 2006).

This thesis will focus only on the introduction of adoption rights, however. The reason for this is rather simply that it is the most salient issue concerning the rights of same-sex couples to raise children and that this thesis cannot – for reasons of time and space – consider all these different policies. The introduction of access to reproductive technologies should – in future research- be considered another example of same-sex family policies. The same could be said about any other policy concerning the possibilities for same-sex couples to raise children, however – as they have tended to stay under the radar of political scientists and sociologists.

Ideally this thesis would then only look at the introduction of joint adoption rights, as it is the most extensive recognition of same-sex family policies. Due to the small number of (European) countries that has so far introduced these policies, however, this thesis will also consider countries that have introduced stepchild adoption. For a more extensive discussion of this choice, see paragraph 3.4 in the next chapter.

Full adoption rights were first granted to same-sex couples in both Sweden and the Netherlands (see appendix 1). Several other countries have followed since. In some countries the introduction of these policies sparked little public debate, but the recent introduction of full adoption rights in France has led to very heated public debates and mass protests (BBC, 2013 a). What should furthermore be noticed (in comparison to other same-sex family policies) is that the introduction of either registered partnerships or marriages for same-sex couples are required before (or at least at the same time as) adoption rights can be granted. The reason for this is quite simply that it is legally impossible to grant a couple the right to adopt children without first legally recognizing the couple.

To my knowledge, there is only one study (on the United States) that has taken the introduction of

adoption rights as its dependent variable. This study, however, only used it to test whether assumptions about morality politics could be applied to the issue (Wald et al., 1996). Moreover, some authors have described the introduction of adoption rights for same-sex couples qualitatively (Rydström, 2008). None of these studies has sought to systematically explain or fully address the introduction of these policies, however.

Due to this lack of academic work on the subject, the remainder of this paragraph discusses the theoretical approaches that have been presented so far, to see whether they should or should (according to their own assumptions) not apply to the introduction of adoption rights for same-sex couples. Generally, I will both argue and assume that there are no theoretical reasons to assume that the causes for the introduction of same-sex unions (registered partnerships and marriages) and adoption rights are all different.

Especially with regard to the internal variables, there is little (if any) reason to assume that they address causal mechanisms that could not equally be applied to the introduction of adoption rights for same-sex couples. Be it public opinion, secularization, modernization or the composition of government, the ways in which these processes are seen to influence the chance of the introduction of same-sex unions are likely to apply equally to the introduction of adoption rights for same-sex couples. One possible exception is that the LGBT movement may tend to first push for the introduction of a same-sex union (or marriage) and to only then push for the introduction of adoption rights for same-sex couples. Whilst this may affect the timing of the introduction of these policies, it is (very) likely that a stronger LGBT movement increases the chance adoption rights for same-sex couples are introduced much in the same way it increases the chance a same-sex family policy is introduced.

A similar argument can be made with respect to the international variables presented above. Partially because they hardly offer an account of the characteristics of a policy, the explanations these explanations provide should theoretically apply to the introduction of adoption rights for same-sex couples. The diffusion of adoption rights for same-sex couples across both geographically close and culturally similar countries is likely to be very similar to that of same-sex unions. Equally, where a country's integration into world society is concerned, the socialization of elites into a pro-human rights discourse is as likely to affect their opinion on same-sex unions as it is to affect their opinion on adoption rights for same-sex couples, which means that, once again, there is no theoretical reason to expect that a country's integration into world society differences should not affect the introduction of adoption rights for same-sex couples.

All in all then, the explanations that have so far been offered to address the introduction of same-sex unions (or other gay rights) seem to be applicable to the introduction of adoption rights, too. Both for methodological reasons and to see whether is actually the case, the actual empirical analysis in this study *has* been split up into one addressing the introduction of same-sex unions and one addressing the introduction of a adoption rights. More on this will be discussed in the next chapter.



## 2.5 Conclusion: Modeling the Introduction of Same-Sex Family Policies

The discussion in this chapter has considered (and formulated hypotheses on) the rapidly growing literature that addresses the introduction of same-sex family policies. Additionally, it has reflected on the extent to which adoption by same-sex couples may or may not (theoretically) fit into the existing theories on the introduction of same-sex unions and concluded that the theories that have been used to explain the introduction of same-sex unions should be applicable to the issue of adoption by same-sex couples.

The literature on the (patterns of the) introduction of same-sex family policies has so far produced two kinds of explanations: those on the national level, that argue that internal changes from 'below' explain patterns in the introduction of same-sex family policies – and those on the international level, that argue that external changes 'from above' (or other countries) explain patterns in the introduction of same-sex family policies.

Although they are not entirely exclusionary, these two different kinds of explanations are to some extent in competition with one another in the sense that they claim that different kinds (national or international) of theories – or pressures - explain patterns in the introduction of same-sex family policies. Moreover, the national theories themselves form a challenge to – respectively – the other national explanations as well, since they claim different causes at the national or international level are at work. The same can be said about the international theories, of course

Although this thesis cannot address or empirically test all the different explanations that have been put forward in the literature, it still hopes to provide an extensive test of a very substantial part of the theories and explanations that have to far been used in the literature. In order to do this, this thesis seeks to answer the following sub-questions:

*Sub-Question 1 A. Can shifts in public opinion explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Sub-Question 1 B. Can shifts in the level of secularization of a country explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Sub-Question 1. C. Can shifts in the level of modernization of a country explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Sub-Question 1D: Can the level of urbanization of a country explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Sub Question 2 A: Can the strength of the gay and lesbian movement in a country explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Sub-Question 2 B: Can the presence of political opportunity structures explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Sub-Question 3 A: Can policy diffusion along geographical lines explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Sub-Question 3 B: Can policy diffusion along similar countries explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

*Sub-Question 4: Can a country's integration into world society explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

It should be noted that these questions have been separated into four 'groups'. This was done to highlight that each of these groups represents questions (and hypotheses) that were derived from the same or similar theoretical accounts of the introduction of same-sex family policies. Questions 1 A through 1 D all address broad societal changes that are said to explain the introduction of same-sex family policies in Europe, for example. Questions 2 A and B were both derived from social movement theory, the way questions 3 A and B were derived from literature on policy diffusion. Question 4, finally, was derived from the different explanations that all revolve around the idea that elites are increasingly socialized in an international and pro-human rights discourse.

All in all, by answering these questions, this thesis hopes to move the existing theoretical field forward in the following ways: firstly, it hopes to further establish the recent turn towards larger cross-national studies (and quantitative methods) that allow for a more systematic assessment of the different explanations that have been proposed thus far. In following the examples set by Fernández & Lutter (2013 and Sluiter (2012), this thesis seeks to bring together and test against one another the different explanations that have been proposed by scholars working in this emerging field working on the introduction of same-sex family policies. Furthermore, theoretical progress is sought by expanding the scope of these studies to the issue of the adoption of children by same-sex couples – an issue that has thus far largely been ignored, especially in studies on Europe(an countries). The expectation is that the explanations for the introduction of same-sex unions should equally apply to the introduction of adoption rights for same-sex couples. That is also why no separate hypotheses were formulated: the hypotheses should (theoretically) apply to all the same-sex family policies that are studied here, meaning that no separate hypotheses were required.

To find an answer to the sub-questions, the next chapter presents the methods, data, and definitions that will be used for this purpose.

## Chapter 3: Methodology

---

### 3.1 Introduction

The last chapter has presented the different explanations for the introduction of same-sex family policies that have so far been introduced in the literature – and presented the sub-questions that this study hopes to answer. This chapter will continue by discussing the methods used to answer these sub-questions. In order to do this, several steps need to be taken. Firstly, this chapter is used to (briefly) describe the introduction of same-sex family policies on both a global and European level. From this discussion, the argument will be derived that although the aim of this study is to explain the introduction of same-sex family policies in Western Europe, there are reasons to assume that the scope of the explanations may extend well beyond the borders of Western Europe and apply to many other (Western) countries.

This global description of the introduction of same-sex family policies also allows for the temporal demarcation of this study; since the first country to introduce a same-sex family policy was Denmark (in 1989) (Festy, 2006), this study is limited to the period between 1988 and 2013 – choosing 1988 to allow some of the effects of the explanations offered to ‘filter’ through societies to the government level and allow for the introduction of same-sex family policies. Data limitations, further limit this study to 2010, however.

The fact that the events that this study seeks to explain (the introduction of a same-sex family policy) are dichotomous (a policy is either introduced or not) and because the levels of the explanations (for example secularization) vary over time, event history analysis is the (quantitative) method of choice. This method, which was first developed to determine the time of survival of patients has been introduced in the social sciences to explain all kinds of events (Steele, 2005). The choice for this method will be justified vis a vis the alternative of more qualitative approaches and in comparison with other quantitative options.

Having presented and discussed the methods that will be used to answer the questions in this study, the chapter moves on to define and construct the dependent variable. For the analysis of the four different same-sex policies (registered partnerships, marriages, stepchild and joint adoption rights), they will be divided into two different dependent variables: one about the introduction of same-sex unions (marriages and partnerships) and one about the introduction of adoption rights (stepchild and joint). The choice to separate these two will be defended methodologically.

Subsequently, the chapter moves on to operationalize hypotheses that were presented in the previous chapter. For each of these hypotheses, the concepts underlying them are discussed and the data used to measure them will be presented.

The final part of the chapter then offers a short discussion of the methods used and the possible limits that the operationalization of the hypotheses has on the validity of this study.

All in all then, after this introduction, this chapter begins by discussing the context and limits of this study in both time and space. It then presents and defends event history analysis as the method of choice, to then present and discuss the dependent variable(s). Subsequently, the hypotheses of this

study are repeated, discussed and operationalized – and the chapter concludes with a short reflection on the (problems with) the operationalization of these hypotheses.

## 3.2 Setting the Stage: What Are We Analyzing?

This part of this thesis will briefly describe the (global and historical) developments around the introduction of same sex family policies. It will use this discussion to identify the universe of cases, population and units of analysis of this thesis. The identification of these elements will also immediately contain the limitations in time and space of the research done in this thesis. All in all, this paragraph thus moves from a broad discussion of the introduction of same-sex family policies to the more specific level of empirical inquiry in the remainder of this thesis.

### *3.2.1. Same-sex family policies: a recent but rapidly expanding domain*

In 1989 Denmark attracted the attention of the world by being the first country to introduce a registered partnership scheme for same-sex couples. Throughout the nineties, the Danish example was followed by other Scandinavian countries, the Netherlands, Belgium and France. In 2001, the Netherlands had another world premiere when the country allowed same-sex couples to get married. Denmark and Iceland, moreover, were the first countries to allow same-sex couples to adopt children in 1999. (Baatrup & Waaldijk, 2006; Festy, 2006; Stefánsson & Eydahl, 2003). In the decade that has passed since, all Western-European countries (with the exception of Greece and Italy) have introduced registered partnerships that offer somewhat varying degrees of rights and recognition for same-sex couples. Although not all of them have followed, a fair number of European countries have now also extended the right to marry to same-sex couples – and the same can be said of the introduction of the right to adopt children for same-sex couples. For a full overview, see table 3.1 below and appendix 1.

Outside Western Europe, registered partnerships have been introduced in several countries. Same-sex couples can now be registered in areas as diverse as some American states, the majority of Southern-American countries, Czech Republic and Hungary. Even the introduction of the same-sex marriage has extended to Canada, South Africa, Argentina and parts of Mexico, the United States and Brazil. Some of these countries – like South Africa and Argentina – surprised many by being among the first countries to grant such rights to same-sex couples. (BBC, 2013).

Due to the diversity of possible different ways to allow same-sex couples to raise children (Digoix et al. 2006), it is harder to provide a brief overview of the different rights that have been granted to same-sex couples, but the right to adopt children has been granted in countries as diverse as South Africa and Argentina (Laws.com, 2013; Toward Freedom, 2010).

In the past, several authors have argued that the introduction of same-sex family policies seemed to follow a two or three stage pattern – in which countries first introduced a registered partnership law, then the right to marry and (sometimes) the right to adopt children (Waaldijk, 2001). This dynamic no longer seems to apply, however. There are now quite some countries that have not followed these steps. Examples of this are the Swedish and English cases, in which adoption rights were granted before the introduction of same-sex marriage (Manches, 2013; Ytterberg & Waaldijk, 2006). Several countries like Portugal and Spain have, moreover, skipped the introduction of registered partnerships altogether and directly introduced marriage rights for same-sex couples (Fernández & Lutter, 2013).

Another characteristic of all these same-sex family policies is that they have not been repealed after their introduction. The only exception to this general rule seems to be the United States, where a referendum (called Proposition 8) was used to undo the introduction of same-sex marriages in the state of California - and then overturned by the Supreme Court (The Guardian, 2013).

**Table 3.1: The Introduction of Same-Sex Family Policies in Western Europe:**

	<b>Registered Partnership</b>	<b>Same-Sex Marriage</b>	<b>Stepchild Adoption</b>	<b>Joint Adoption</b>
<b>Austria</b>	<i>2009</i>	No law	No law	No law
<b>Belgium</b>	<i>1998</i>	2003	<i>2003</i>	2005
<b>Denmark</b>	<i>1989</i>	2012	<i>1999</i>	2010
<b>Finland</b>	<i>2001</i>	No law	<i>2009</i>	No law
<b>France</b>	<i>1999</i>	2013	2013	2013
<b>Germany</b>	<i>2001</i>	No law	<i>2004</i>	No law
<b>Greece</b>	No law	No law	No law	No law
<b>Iceland</b>	<i>1996</i>	2006	<i>1999</i>	2006
<b>Ireland</b>	<i>2010</i>	No law	No law	No law
<b>Italy</b>	No law	No law	No law	No law
<b>Luxembourg</b>	<i>2004</i>	No law	No law	No law
<b>Netherlands</b>	<i>1997</i>	2000	<i>2000</i>	<i>2000</i>
<b>Norway</b>	<i>1993</i>	2008	<i>2001</i>	2008
<b>Portugal</b>	No law	<i>2010</i>	2013	No law
<b>Spain</b>	No law	<i>2005</i>	<i>2005</i>	<i>2005</i>
<b>Sweden</b>	<i>1994</i>	2008	<i>2002</i>	<i>2002</i>
<b>Switzerland</b>	<i>2004</i>	No law	2012	No law
<b>United Kingdom</b>	<i>2004</i>	No law	<i>2004</i>	<i>2004</i>

Events used in the analysis of this thesis are displayed in *italics*. Last updated: July 7, 2013. For the laws, exact dates of introduction and the sources this table is based on, see appendix 1.

### ***3.2.2. Reducing the scope of this study***

Generally, same-sex family policies are introduced at either the sub-national level (United States, Mexico), the national level (European countries), or sometimes both (Brazil and Canada). This means that any study that wishes to examine the introduction of same-sex family policies faces a ‘universe of possible cases’ that exists of the countries or regions that have (or could) introduce(d) such policies.

Most of the theories that have been presented in the previous chapter, however, seem to assume that same-sex family policies are introduced by democratically elected parliaments (or governments representing a parliamentary majority). This means that they do not (pretend to) explain those countries or regions in which other actors than parliaments or governments introduce these policies. In South Africa, for example, the introduction of same-sex marriage and adoption rights, was mainly enforced by its constitutional court (LA Times, 2013). In the United States, some states have used measures of direct democracy, and there is some evidence to suggest that this affects the dynamics behind the introduction of these policies (Haider-Markel et al., 2007).

Moreover, the ‘international’ explanations presented in the chapter above all use explanations that look at the introduction of same-sex family policies at the national level. Although diffusion (and some socialization in higher-level interactions) might well affect the introduction of same-sex family policies at a sub-national level, the structures and settings that encourage either diffusion or the socialization of elites are likely to play out somewhat differently at the national level and than at the sub-national level. There is, moreover, some empirical evidence to suggest that (geographical) diffusion is no key factor in the diffusion of some same-sex family policies in American states (Haider-

Markel, 2001)

All this means that this study is inevitably limited to the study of countries that introduce same-sex family policies at the national level and in parliaments. Whilst this qualifies more countries than just Western European ones, there are several other reasons to limit this study to this region. The first is that these countries are quite comparable in terms of their political systems and the international networks they are part of; this predominance of somewhat comparable proportional representative systems implies that the causal explanations behind the introduction of same-sex family policies will probably be relatively comparable and similar across the region. Secondly, these countries are part of the most regionally integrated part of the world, meaning that the chance the international explanations can be found is probably high. Thirdly and most importantly, there was simply no comparable data for other regions – such as New Zealand, Australia and Latin America - that might theoretically have been included in this study.

In spite of these similarities in characteristics among European countries, there remains a huge variation in the degree to which these countries have introduced different same-sex family policies: with countries like Italy not having introduced a single one, and Norway having introduced the full set of same-sex family policies (see table 3.1 and appendix 1): meaning that there is enough theoretically relevant variance left to explain.

As for limitations in time, this study would preferably investigate the period between 1988 and 2013; since 1989 was the first time a country introduced a same-sex family policy, it makes sense to limit the study to 1988. Part of this limitation is chosen because of the method used, but choosing one year before the first introduction also suggests that it was the first year in which the setting was ‘right’ for the introduction of same-sex family policies: it is, after all, rather likely that changes in public opinion, pressure on politicians, a debate about the introduction and the final implementation of a policy all take some time – justifying some lagged effects. This is an approach that has been adopted by other studies that follow similar designs (Fernández & Lutter, 2013). It would be interesting to more carefully study the length of such lags (as processes such as secularization may require more time to ‘filter through’), but unfortunately data limitations make this impossible for this study. That is why all variables were lagged one year, with the exception of the composition of government. The reason that this variable was not lagged is that lagging it would sometimes lead to a different government being coded as having introduced a policy than the government that had actually introduced the policy. Moreover and unfortunately, data were not available up to 2013 (and because the year is not finished, coding on the dependent variable would be hard, too), which is why this study is limited to the year 2010.

This scope of this study is thus the introduction of same-sex family policies by Western European parliaments in the period between 1988 and 2010. There seems to be no reason, however, to expect that its conclusions would not extend to other countries that introduce same-sex family policies at *the national level and in parliaments* (such as New-Zealand, for example, (ABC News, 2013)). Future research would probably do well to more carefully study the exact causal mechanisms behind the theories and the degree to which different institutional designs of countries effect and shape the different ways in which same-sex family policies can be introduced.

### 3.3 The Method: Event History Analysis

Having thus limited this study to Western-European parliaments in the period between 1988 and 2010, the method that is used for the analysis of this region and period is event history analysis. This section first explains the method and argues why it is suited for this study. The method will then (briefly) be compared to other, both qualitative and quantitative approaches that could have been used for this study.

Statistical models using event history were first introduced in medical studies to predict the survival time of patients –hence the method’s original name was survival statistics (Allison, 1999, p. 185). The method treated the death of a patient as a dichotomous event that had to be explained, but the social sciences have since realized that a great many things can be seen as ‘events’ (Ibid). In political science, scholars in international relations have often used this method to analyze the outbreak of wars between countries – as it can be considered an event (Gilardi & Fuglister, 2008). A bit more recently, comparative political scientists and sociologists have started to treat the introduction of policies as events (that either happen or do not happen) (Berry & Berry, 1990). It was not until 2012, however, that the method was first applied to the introduction of a same-sex family policy in Western Europe (Sluiter, 2012, 135-140).

Discrete event history models of this kind use year-country data to estimate the ‘risk’ or hazard that a certain country introduced a certain policy in a given year, and uses the independent variables to see how well they can explain or predict these changing risks (Gilardi & Fuglister, 2008). Once a country has introduced a policy, it is no longer at risk, which means it is dropped from the model after the year it has introduced a policy. Medical studies sometimes employ non-discrete models in which time is treated as continuous, rather than divided into separate periods. Whilst this of course does more justice to the way time elapses, most data about countries are only collected at one-year intervals (or even less), as we will see below. This means that for this study, we are inevitably bound to discrete event history models, working with country-years as the unit of analysis (Steele, 2005). Another advantage of event history analysis is that it can deal with censoring: the chain of events that is being explained does not end, simply because we have chosen to analyze it (Allison, 2005; Box-Steffensmeier & Jones, 2004, pp. 15 -16). To explain this using an example from this study, there is a chance that countries may introduce same-sex marriages in the future (there is a national debate about it in Luxemburg, for example (see appendix 1)), meaning that a non time-sensitive approach could not capture such possible future events: event history analysis can, however, still calculate the ‘risk’ a country introduces a policy in a given year as it can deal with right-censoring (Box-Steffensmeier & Jones, 2004, pp. 15- 16).

More specifically this thesis employs Cox-Models to analyze the introduction of same-sex family policies in Western-Europe between 1988 and 2013, because – compared to other possible Event-History models it allows the base-line of the model to vary. This means that the shape of the baseline is estimated, rather than given. (Ibid, pp. 47 -48). Since we have no real expectations about the shape of this baseline, this is a suited approach for this study.

Event history models are thus especially well suited for investigating the introduction of same-sex family policies, as they are designed for dichotomous dependent variables (a country does or does not introduce a policy) and because they allow for variation both over time and between countries. Moreover, because year-country units are the level of analysis, the number of cases increases dramatically from the original 18 countries in the study (see also: Ibid., p. 70; Petersen, 1991). These are all clear advantages that distinguish this approach from other methods like ‘normal’ logistic regression. Finally, the time-sensitivity of the models is useful for the operationalization of certain



variables. An example of this is that the introduction of same-sex family policies has been argued to increase public support for these policies after their introduction (Takács & Szamla, 2011): this means that non time-sensitive measure could confuse public support as a consequence of the introduction of same-sex family policy with public support as a cause of the introduction of a same-sex family policy.

On a somewhat more abstract level, this study has opted for a quantitative approach for several reasons. The first and most obvious is that it allows for the study of a larger number of countries at once, making for a broader investigation of the introduction of same-sex family policies. Moreover – as has been discussed in the previous chapter – the academic work on the introduction of same-sex family policies has so far been based on small-n comparisons that have sprouted numerous plausible explanations for the introduction of same-sex family policies. Only recently, two studies have sought to more systematically compare the strengths of these explanations in broader comparisons of larger numbers of European countries (Ferández & Lutter, 2013; Sluiter, 2012 ). This thesis thus hopes to move the theoretical field forward by using methods that allow for the analysis of both larger numbers of possible explanations and larger numbers of countries, making for a broader assessment of the theoretical work that has been done over the last decade. In spite of this, this thesis cannot assess all the different explanations that have so far been offered, but it should go quite some way in combining and comparing a fair amount of different possible explanations in a broad cross-national comparison.

Of course, this choice for event history analysis as the method used to answer the sub-questions in the previous chapter has significant consequences for the way in which the different relevant concepts in these questions are measured. That is what the next part of this chapter addresses.

### 3.4 The Dependent Variable: the Introduction of Same-Sex Family Policies

With the spatial and temporal ‘boundaries’ of this study demarcated, and event history analysis chosen as the method of analysis, the following section first defines and operationalizes the dependent variable of this study: the introduction of same-sex family policies. This variable is split into two variables (the introduction of same-sex unions and the introduction of adoption rights for same-sex couples), which are analyzed in separate models.

Although quite some other policies could be considered same-sex family policies (for an overview, see: Digoix et al., 2006) this study considers four such policies: registered partnerships for same-sex couples, same-sex marriages and stepchild and joint adoption rights for same-sex couples.

For the analysis, however, these three policies will be transformed into two dependent variables: the introduction of *same-sex unions* (registered partnership and marriage) on the one hand and *adoption rights* on the other.

Adoption rights were separated from the other two policies for three reasons. The first is rather simply that no academic work has yet been done on these rights. Although I have argued that, theoretically, I do not expect major differences in the causes of the introduction of same-sex unions and adoption rights, some caution is in place because the subject is so new. Secondly, since so few countries have introduced adoption rights for same-sex couples, the analysis of this policy is somewhat harder than it is for the other two. Finally, the kind of event history analysis used in this study requires a dichotomous dependent variable, meaning that these three policies could not be ‘indexed’ into a single dependent variable (for this study).

#### 3.4.1. Same-sex unions

There are also three reasons for combining registered partnerships and marriages. The first is that they are hard to fully separate empirically, since some countries (like Portugal (Fernández & Lutter, 2013)) have moved directly towards the introduction of marriage for same-sex couples, thus ‘skipping’ the step of introducing a registered partnership. Moreover, combining the two (somewhat) increases the number of countries that has in one way or another recognized same-sex couples by law, making for more variance on the dependent variable. Thirdly, combining registered partnership and marriages means that this combined variable (much) better captures what has been seen as a clear-cut case of policy convergence in Western-Europe: with all countries except Greece and Italy introducing laws that recognize same-sex couples over the course of only two decades (Ibid; Kollman, 2007).

Of course, a dependent variable measuring the introduction of same-sex unions is not perfect: it cannot investigate why countries opt for either marriage or partnership rights, nor can it capture the somewhat varying rights granted to same-sex couples under registered partnership schemes (Digoix et al., 2006). It does, however, capture what is probably the most important feature of both policies: the legal recognition of the existence and legitimacy of same-sex couples. As more data becomes available, future research could try and separate the two for a more elegant measure, but since the 2013 wave of introductions of same-sex marriages could not be included in this study yet, this ‘simplified’ solution has been chosen.

The first dependent variable of this study thus measures whether or not a country has introduced a same-sex family union. Coded as country years, a country is scored “0” if it has not introduced a same-sex union and “1” if it has. After a country introduced a same-sex family policy, it is dropped from the analysis. Since sixteen countries have introduced a same-sex union since 1989, this means

that a total of sixteen ‘events’ has to be explained (see table 3.1).

### *3.4.2. Adoption rights for same-sex couples*

As was mentioned in the theoretical chapter of this paper, there are many aspects to the right of same-sex couples to raise children, ranging from access to reproductive technologies to the recognition of partners. This thesis will only consider policies that are related to the right of same-sex couples to adopt children. The right to such adoptions comes in two kinds. The first is the right to stepchild adoption, the second the right to adopt children the same way heterosexual couples can adopt children. Ideally, the measure of adoption rights for same-sex couples would simply measure whether same-sex couples were granted the latter, full adoption rights. Mainly due to data limitations, however, it is at this point impossible to extend the analysis in this study beyond 2010, at which point only six countries had granted full adoption rights to same-sex couples (see table 3.1). This would mean that there would be very little variance on the dependent variable. By adding countries that had introduced stepchild adoption before or in 2010, this number can be extended to ten (see table, 3.1). Whilst this is still a rather low number, it should at least allow for some meaningful analysis and similar studies have in the past used similar numbers of events (Sluiter, 2012, p. 138).

The first policy that was introduced in a country was coded as the event (see below). However, this measure is far from perfect, but given the small number of introductions and the fact that no other studies (not even qualitative ones) have studied this subject yet, means that this study –should at least be able to shed some light on the direction future research can take. Moreover, the recent introduction of full-adoption rights in many more countries means that it is only a matter of time before the data becomes available to allow for somewhat better studies using similar methods. The second dependent variable thus measures whether or not a country has granted either full or stepchild-adoption rights to same-sex couples. Coded as country years, a country was coded as “0” when it had not introduced such rights in a given year and “1” when it had – after which it was dropped from the analysis. Starting in 1998 - a year before the first introductions (by Iceland and Denmark in 1999, see appendix 1) and continuing until 2010, with a total of ten events to be explained.

## 3.5 Independent Variables

In this part of the chapter, the hypotheses presented in the theoretical part of this chapter are operationalized. After briefly repeating these hypotheses, the core concepts in each of them are defined and the use and sources of data are justified. Moreover the coding of each variable is briefly discussed<sup>3</sup>. It should moreover be remarked that all data was coded in a year-country structure, with one case being a given country in a given year. Where little or problematic data was available, this has been mentioned. An extensive discussion of some of the limitations of data and the consequences of these limitations can be found at the end of this chapter.

### 3.5.1. The national explanations

#### *Public Opinion*

Public opinion has often been said to influence the chance a country introduces a same-sex family policy, through what some have called the “electoral” link: the idea that politicians want to be re-elected and thus follow public opinion when it comes to issues that attract high levels of public attention. This leads to the following hypothesis:

*Hypothesis 1A: The higher the level of public support for same-sex policies in a country, the higher the chance it introduces a same-sex family policy.*

Public support is understood as the percentage of the public that supports the introduction of a specific policy. That is why this study uses data from the European Values Study (EVS) (2013) and World Values Survey (2013) (WVS), which have measured the degree to which people agree with the statement “homosexuality is justifiable”. Respondents could respond on a 1 (never) to 10 (always) scale. Although this is not a perfect measure (for it does not capture support for specific policies), it seems plausible to that support for this statement would follow very similar trends as support for same-sex unions and adoption rights for same-sex couples. There were two main problems with the operationalization of this variable. The first is that the data was only measured at 2 to 8 year intervals (depending on which countries had participated in which waves of the EVS and WVS. Missing data points were interpolated (and in a few cases, extrapolated) using linear interpolation. Even though it means that a fair part of the data points are based on estimates, this interpolation does at least allow for year-country analysis. For more on this, see appendix 2. The second problem is that no or insufficient data was available for Greece and Luxembourg, which is why models with and without this variable were run to make sure the missing cases did not distort the result.

#### *Secularization*

Authors have argued that – either as part of or separately from processes of modernization- the more secular a country is, the higher the chance the public (and politicians) support the introduction of same-sex family policies – which increases the chance such a policy is introduced in a country (Fernández & Lutter, 2013). The causal mechanism underpinning this process is somewhat under theorized, but probably works as follows: religious values are assumed to lead to opposition against same-sex family policies – so as both the electorate (and politicians) become(s) more secular, support for same-sex family policies should increase, which in turn leads to their introduction. From this, the following hypothesis was derived:

---

<sup>3</sup> For more specific information on the coding of the variables. Please see appendix 2.

*Hypothesis 1B: The higher the level of secularization in a country, the higher the chance it introduces a same-sex family policy.*

Generally, secularization is conceived to be a process in which societies become increasingly less religious (thus putting religious and secular societies as opposite ends of a scale) (Paternotte, forthcoming). Fernández & Lutter (2013) are the only scholars to have included and measured secularization in a study of the introduction of same-sex family policies. They used an index of secular values to capture the degree of secularization in a country. This measure, however, captures secular values (that are said to be the consequence of becoming less religious). Such a measure is problematic, because it captures value-orientations, rather than the direct importance of religion. Moreover, these value-orientations might be closely related to values that determine public opinion on homosexuality, which means that the two (secularization and public opinion) could no longer be separated. This study thus employs a different and more direct measure of secularization, by using an item from the European Value Surveys that asked people how often they attend religious services. These scores were aggregated to the national level (with the number of people that go to church less than once month coded as 'secular') to obtain year-country data. For more information on the exact coding of this variable, see appendix 2. Of course, the two problems that applied to the European Value Studies data on public opinion (having to interpolate and missing a number of countries), also apply to this variable.

#### *Modernization*

Following Inglehart's (2008) modernization theory, some authors have argued that as societies become more affluent, the people living in them worry less about socio-economic issues and more about "post-modern issues" (for example: Fernández & Lutter, 2013). Since the rights of homosexuals are said to be one such issue, people in more modernized societies are expected to also show greater support for same-sex family policies, which in turn leads to their introduction. That is why the following hypothesis was formulated:

*Hypothesis 1 C: The higher the level of modernization in a country, the higher the chance it introduces a same-sex family policy.*

Although the most basic explanation of modernization would simply suggest that the more money people in a country make, the more 'post-modern' they become in their value-orientations, a simple measure of a country's GDP per capita would probably not suffice. The reason for this is that other factors (like good general health and access to school) are also likely to affect the degree to which people feel 'safe enough' to worry about postmodern issues. That is why this study follows the example set by Fernández and Lutter (2013) and uses the UN Human Development Index (HDI) to measure the level of modernization of a country. This index combines the level of Purchasing Power per Person (PPP) per capita, the life expectancy in a country (as a measure of general health) and the expected years of schooling into an index. (Human Development Index, 2013). Ideally, we would adjust this measure for economic inequality – as the distribution of wealth is also assumed to influence the degree of perceived "safety", but at this time the inequality adjusted HDI is not available for comparisons over time. (Human Development Report, 2013, p. 142). The level of Human Development is measured at five year intervals and has been interpolated between these moments to obtain year-country data. The score for each country in a given year is measured on a scale between 0 – 1, with a higher score indicating a higher level of human

development.

### *Urbanization*

Although there are not that many studies that have considered urbanization, some authors have argued that as urban areas offer a more diverse environments for their inhabitants (than rural areas), the people living in them become more tolerant towards 'different' lifestyles, of which homosexuality is an example. (Wald et al., 1996). This led to the following hypothesis:

*Hypothesis 1 D: The higher the level of urbanization in a country, the higher the chance it introduces a same-sex family policy.*

In this study, urbanization is defined as the part of the population of a country that lives in larger, urban agglomeration in a given year. The data used to measure this concept comes from the World Bank Development Indicators and gives a score of 0 – 1 that reflects the percentage of people that lives in urban agglomerations in a given year (World Bank, 2013). The data is assembled by national statistical agencies.

### *Movement Strength*

Quite a large number of authors has argued that and how the lobbying efforts of the LGBT movement have had a significant impact on the introduction of same-sex family policies in a country (Haider-Markel & Meier, 2003; Rydström, 2008; Tremblay et al., 2011). That is why the following hypothesis was included in this study:

*Hypothesis 2 A: The stronger the gay and lesbian movement in a country, the higher the chance it introduces a same-sex family policy.*

Ideally, the strength of the gay and lesbian movement in a country would be measured as some combination of the annual turnover and the number of members of the largest organization/ association dedicated to gay, lesbian, bisexual and transgender issues in a country. This is an approach that has been successfully used in studies on the United States (Haider-Markel & Meier, 1996, 2003; Wald et al., 1996). Unfortunately, however, such data has not (yet) been collected for Europe and the empirical research effort needed to obtain such data is well beyond the scope of this thesis. As a far from perfect measure, this study will follow the example of Fernández and Lutter (2013) and use the number of associations registered with ILGA-Europe (the international organization most significant gay and lesbian movements are part of) as a proxy for the strength of the gay and lesbian movement in a country. The most obvious problem with this indicator is of course that in countries with a fractioned (and probably weaker) gay and lesbian movement, there may be a large number of gay and lesbian movements. Moreover, this variable is insensitive to the possibility that there are only few very strong organizations active and present in a country. This means that this measure might capture the degree of federalization or the size of a country, rather than the actual strength of the gay and lesbian movement. Another constraint was that information on the member organizations of ILGA – Europe was only available in recent years (ILGA-Europe, 2013 b), which means that the variable is not time-sensitive. For more on this variable and the data collection, please see appendix 2.

Future efforts to collect data on gay and lesbian movements in Europe would be very useful for improving the research efforts done in this field. Moreover and more importantly, the consequence of this rather weak operationalization is that any conclusions about the strength of the gay and

lesbian movement should be drawn most carefully.

### *Political Opportunities*

Apart from just the strength of the movement, scholars working on social movements in general (Tarrow, 1994) and the gay and lesbian movement in particular (Paternotte, 2011; Smith, 2005) have argued that the opportunities for the gay and lesbian movement to pursue their goals are another important factor that determines whether or not a same-sex family policy is introduced. That leads to the following hypothesis:

*Hypothesis 2 B: The more political opportunities there are for the gay and lesbian movement in a country, the higher the chance it introduces a same-sex family policy.*

In this study, the political opportunities of the gay and lesbian movement are defined as whether or not there is a predominantly left wing or progressive government in place: as these are assumed to be more receptive to the claims of the gay and lesbian movement than predominantly Christian and conservative coalitions. Although some authors have included this variable in their study of the introduction of a same-sex family policy (Fernández & Lutter, 2013; Sluiter, 2012) and sometimes even related it to political opportunities (Ibid.), the concept has not yet been fully integrated into explanations coming from the field of social movement theory.

The data used comes from the Comparative Political Dataset (Armingeon et al., 2012), which includes a variable that measures the left-right composition of a government on a 1 – 5 scale. The measure is based on the percentage of cabinet portfolios that is held by either left wing or right wing politicians. If a policy was introduced during an election year, the left-right composition of the government in power at the moment parliament decided was coded.<sup>4</sup>

### *3.5.2. The international explanations*

#### *Introduction in a geographically close country*

A large field of scholars has either argued that or tested whether or not policies diffuse from one country to the next country (Gray, 1973; Haider Markel, 2001; Sluiter, 2012). For the introduction of same-sex unions, Sluiter (2012, p. 153) has found that the diffusion between geographically close countries was significant (even though it explained little extra variance). That is why the following hypothesis was formulated:

*Hypothesis 3 A: If a country introduces a same-sex family policy, the chance a geographically close country introduces a same-sex family policy increases.*

The introduction in a geographically close country was operationalized as the introduction of a same-sex family policy in a neighboring country. It was then measured by calculating the percentage of the total number of neighboring states of a country that had already introduced the same-sex family policy being analyzed. The scores thus vary from 0 – 1, with 0 meaning no neighboring country had introduced the same-sex family policy under consideration, and 1 meaning all neighboring countries had introduced the same-sex family policy under consideration. For the exact calculation of the scores, please see appendix 2. There is another – more common – approach to studying the diffusion of policies, which is known as the dyadic approach. In these approaches, the unit of analysis is the

---

<sup>4</sup> A similar approach was also used by Fernández & Lutter (2013) and Sluiter (2012). I want to thank Roderick Sluiter for helping in pointing out the existence of (and providing) this data.

‘dyad’ between two countries in a given year, and the independent variables can be used to see whether diffusion is more likely to take place along certain dyads. (Gilardi & Fuglister, 2008; Volden, 2006). Whilst this approach is undoubtedly more valid, it does not allow one to test both internal and diffusion variables simultaneously (as we would end up testing whether or not policies diffuse faster across highly urbanized countries, as opposed to whether the introduction of a same-sex family policy is more likely in a highly urbanized country). So, admittedly, there is a somewhat better way to measure the diffusion of policies, but whether or not the proportion of neighboring countries that has introduced a same-sex family policy affects the introduction of such a policy, should still allow for the drawing of substantive conclusions about the hypothesis.

#### *Introduction in a Similar Country*

Scholars of policy diffusion have (recently) argued that apart from diffusion from one close by country to the next, policies may also diffuse among countries that share certain characteristics (Beck et al., 2006). That is why the following hypothesis was derived:

*Hypothesis 3 B: If a country introduces a same-sex family policy, the chance a similar country introduces a same-sex family policy increases.*

The only study (to my knowledge) to test this kind of diffusion in Europe tested for the religious backgrounds of a country, the linguistic tradition of a country and the kind of welfare state a country did not find any effects (Sluiter, 2012, p. 153- 155). For this study, I will only test for the first of these: whether or not same-sex family policies diffuse more quickly across countries with similar religious backgrounds. Whilst this is no doubt somewhat limited, countries that share similar religious backgrounds will be quite likely to largely also share linguistic characteristics (Roman catholic countries where Latin languages are spoken, for example) – especially in Western Europe. Even though only diffusion between countries with a shared religious background is tested, these backgrounds are likely to also capture some other cultural similarities between countries. Much like the previous variable, the variable used to test diffusion across countries with similar religious backgrounds measures the proportion of countries with a similar religious background that had adopted the same-sex family policy under investigation in a given year on a 0 – 1 scale<sup>5</sup>. Here, 0 indicates that no other countries with a similar religious background have introduced a given policy and 1 indicates that all countries with a similar religious background have introduced a given policy. Following Sluiter (2012, p 139), the data come from the World Churches Handbook (Bierley, 1997, p. 10), which measures the church membership at five-year intervals between 1960 and 2010. From this, five (constant) groups of countries with similar religious backgrounds were identified: predominantly protestant countries, predominantly catholic countries, mixed countries, Anglican and Greek-Orthodox countries. For exact coding, please see appendix 2.

#### *Integration into World Society*

A fair number of scholars have argued that the socialization of elites in international organizations increases the chance that these elites push for (and achieve) the introduction of same-sex family policies in a country sources. That is why the following hypothesis was derived:

---

<sup>5</sup> Of course, the same considerations about using the alternative of a dyadic approach equally apply to this variable.



*Hypothesis 4: The more integrated a country is into the world society, the higher the chance it introduces a same-sex family policy.*

So far, only one (very recent) study has attempted to measure the degree to which a country was integrated into world society in Western Europe when analyzing the introduction of a same-sex family policy (Fernández & Lutter, 2013). These authors have measured the concept as the number of intergovernmental organizations a given country was a member of in a given year, combined with the number of human rights treaties a country had signed. Unfortunately, the data about the number of IGO's a country is a member of is unavailable (for financial reasons), which is why I have only used the number of Human Rights treaties and covenants a country had ratified (or become a member of) in a given year. The data for this variable come from the ratification index (Isik & Zheng, 2008), which has documented the ratification of human rights treaties by countries throughout the last century. Although a measure that also takes into account the number of international organizations a country is a member of would constitute a better measure, this variable should still capture (some) of the integration into world society by country. Moreover, the main line of argument behind this school of thought is that the world society is focused (strongly) on norms concerning human rights and the idea that LGBT rights have quite recently been framed as such rights. Given how most international treaties do not address LGBT rights, however, this variable should still be able to capture whether the integration of a country in this international human rights frame influences the chance it introduces a same-sex family policy.

### 3.6 Conclusion and Limitations

All in all, this thesis seeks to advance the academic work that is being done on explaining the introduction of same-sex family policies by being among the first studies to use quantitative, larger cross national comparisons to study the subject in Western Europe. Furthermore, this is the first study to systematically investigate the introduction of adoption rights for same-sex couples in Western Europe. Whilst the choice for event history analysis comes with many advantages for answering the main research question of this study, the operationalization of some of the hypotheses used to answer this question does come with some drawbacks.

The most evident is the measurement of the strengths of the LGBT movement as the number of organizations registered with ILGA Europe. Unfortunately, there is little that can be done at this point to further improve this measure – although comparable time-varying data on membership numbers and turnover of gay lesbian movements in Europe would be very welcome.

It should furthermore be noticed that the measures of the diffusion variables is far from perfect. Dyadic approaches have been the method of choice for scholars investigating the introduction of (same-sex family) policies as they better capture diffusion (Gilardi & Füglistler, 2008). An example of this is that geographically close can be measured as distance in kilometers between borders or capitals, which is more precise than the introduction in a neighboring country, which was used here. Moreover, whether or not policies diffuse across similar countries was only tested in the form of diffusion across countries with similar religious backgrounds. Although these religious backgrounds probably overlap with (and thus capture) other cultural characteristics of countries, future studies may do well to more carefully assess this concept.

Another possible concern is a lack of variation on the dependent variable. Whilst this may somewhat decrease the chance of finding significant effects, models with this little variance on the dependent variable have been used (Sluiter, 2012, p. 138). Please note that this is mainly problematic for the introduction of adoption rights, as the number of explained events is higher for the introduction of same-sex family policies.

All in all then, this study should be seen as one of the first steps to more broadly and comparatively investigating the introduction of same-sex family policies throughout (Western) Europe. As time proceeds, more data will probably become available, which would allow to take into account the large number of introductions of same-sex marriages in 2013 and ideally to even extend the analysis beyond Western Europe. Moreover, the availability of more data will also offer future research a chance to better address the methodological challenges faced in this study. For now, however, I am still convinced that this study can offer and meaningfully test quite a few possible explanations of the introduction of same-sex family policies in Europe.

## Chapter 4: Results

---

### 4.1 Introduction

Moving on from the previous chapter, this chapter presents and briefly discusses the results of the analysis of the introduction of same-sex family policies in Western Europe between 1988 and 2010. Before doing so, however, a part of the chapter is used to present and discuss more descriptive results concerning the data. The answers to the sub questions, the theoretical implications of the findings and the more substantive interpretation of the results are reserved for chapter 5 (Discussion), however. As was mentioned in the previous chapter, the analysis consisted of two models: one to analyze the introduction of same-sex unions and one to analyze the introduction of stepchild and joint adoption rights for same-sex couples. The analysis in this chapter has been split into two sections accordingly. For each of the two analyses, the models that were run are described shortly, after which the main results are presented. Subsequently the results of variables in the models will each be briefly discussed: there are some contra-intuitive results, which are explained and discussed. Overall, it seems that the secularization and composition of the government can best explain why countries introduce the same-sex family policies analyzed in this study.

## 4.2 Descriptives, Correlations and Standardization

This paragraph presents the data that was used for the event-history analysis below. In order to provide an overview of (possible problems with) the data, this paragraph first describes the dependent and independent variables. It then moves on to diagnose and discuss the correlations between the different variables and use theoretical arguments to explain some of the found correlations. Finally, the models presented in paragraphs 4.3 and 4.4 were run using x-standardized variables: the reasons for this transformation are provided in a short and separate section.

### 4.2.1 Descriptives: the independent variables

Both of the independent variables used in this study (whether or not a country has introduced a same-sex union and whether it has introduced adoption rights for same-sex couples in a given year), are dichotomous. As can be seen in table 3.1 (p. 30), sixteen out of eighteen countries had introduced a same-sex family union by 2010. To show the pattern of the introduction of same-sex family policies over time, Figure 4.1 plots the survival function of the introduction of same-sex family policies. Such graphs (and additional analysis) are usually used to examine patterns in the *timing* of the introduction of policies – an issue that lies beyond the direct scope of this thesis. Figure 4.1 shows the ‘survival’ of countries that had not yet introduced a same-sex family policy in a given year.

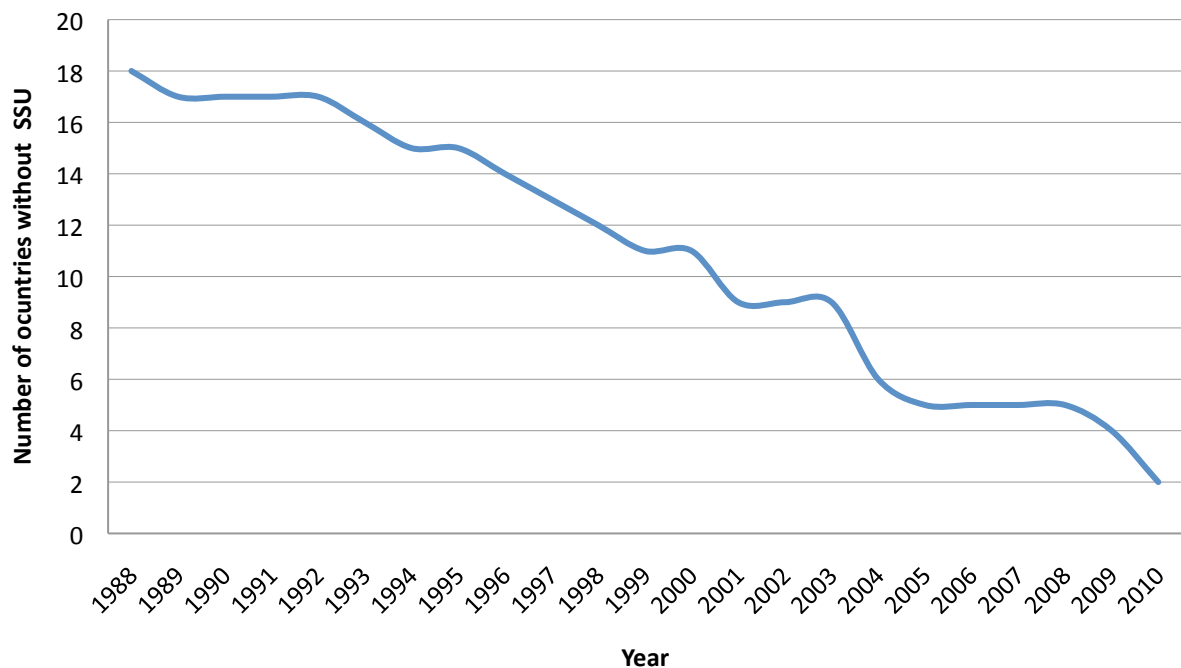


Figure 4.1: Survival curve of the introduction of same-sex unions in Western Europe.

Following the finding by Sluiter (2012, p. 127) the introduction of same-sex family policies in Western Europe seems to follow a fairly linear pattern, even though the number of introductions stayed more or less stable between 2005 and 2009. The introduction of adoption rights for same-sex couples, meanwhile, seems to follow a somewhat different pattern: after a number of subsequent introductions between 1999 and 2004, the number of countries that grant adoption rights to same-sex couples seems to have stabilized: the survival curve of the introduction of adoption rights for same-sex couples is displayed in figure 4.2. It should be noted, however, that the introduction of

adoption rights may be picking up again, as a new set of introductions seems to have started with the recent introduction of adoption rights in France, Switzerland and Portugal (BBC, 2013a; Reuters, 2013; Swissinfo 2012).

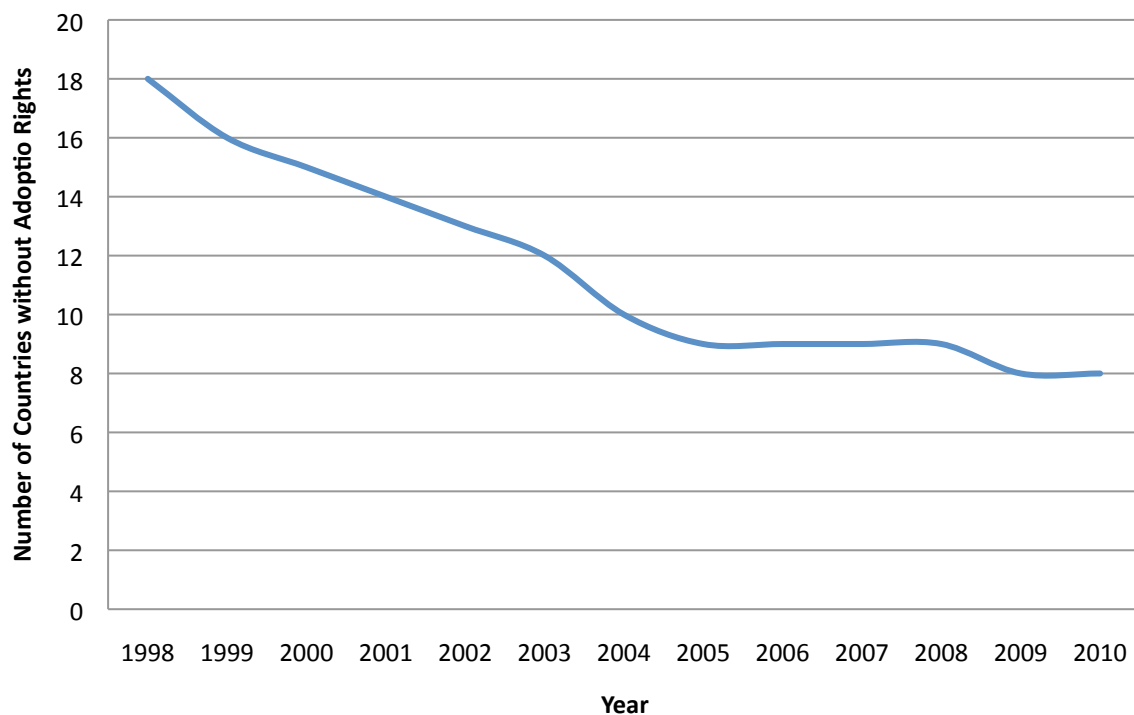


Figure 4.2: Survival curve of the introduction of adoption rights for same-sex couples in Western Europe

This suggests that the introduction of adoption rights for same-sex couples in Western Europe could be following an s-curve: a pattern that is typically associated with the introduction of policies (Sluiter, 2012, p. 83- 86) research may shed more lights on the different patterns in time of the introduction of same-sex family policies – and would do well to separate registered partnerships, marriage rights, stepchild and joint adoption rights from one another to get a better picture of the actual patterns per policy. Moreover, these different slopes could imply that – contrary to my theoretical expectations, there are some differences in the causes behind the introduction same-sex unions on the one hand and adoption rights on the other.

#### 4.2.2 Descriptives: the dependent variables

The following section presents some of the more common descriptive statistics of all of the nine independent variables that are included in this study. In order to facilitate the presentation and discussion of this descriptive analysis, the variables have been separated into three groups: those concerning broad societal changes and those that are deemed pivotal to social movement theory and the international explanations. Moreover, the variables concerning the composition of government and diffusion across regional and religious lines were all scored somewhat differently for same-sex unions than they were for adoption rights (see paragraph 3.5), which is why they were included twice in this section.

Looking at the variables concerning broad societal changes in table 4.1, few real problems become apparent from these descriptive statistics: the variables are not that skewed (with the exception of

secularization – which is slightly right-skewed) and there are no unexpected values or outliers.

**Table 4.1: Descriptive statistics of the ‘societal change’ variables**

		Public Opinion	Secularization	Human Development Index	Urbanization
N	Valid	352	352	396	396
	Missing	44	44	0	0
Mean		,33078	,70965	,84728	,75410
Median		,31158	,75900	,85250	,76050
Mode		,182	,890	,884	,658
Std. Deviation		,181050	,199143	,045860	,112098
Skewness		,601	-1,248	-,380	-,181
Std. Error of Skewness		,130	,130	,123	,123
Minimum		,036	,121	,700	,469
Maximum		,930	,923	,952	,974

The only issue that could be identified are the missing cases on the variables of public opinion and secularization, which are caused by the fact that no data was available for Greece and Luxemburg. In order to make sure the exclusion of these two countries would not bias the results, a model was run without the variables that measure public opinion and secularization.

As for the descriptive statistics of the LGBT movement and political opportunity variables: they show relatively little problems. It should be noted, though, that the data for the strength of the LGBT movement was only available for one year, which also explains that the mode of two (two countries had it as a constant score) is so different from the mean and median.

**Table 4.2: Descriptive statistics of the LGBT movement and political opportunity variables**

		LGBT Movement	Government Composition (SSU)	Government Composition (Adoption)
N	Valid	396	395	395
	Missing	0	1	1
Mean		12,78	2,60	2,60
Median		11,00	3,00	3,00
Mode		2	1	1
Std. Deviation		10,584	1,431	1,429
Skewness		,557	,372	,377
Std. Error of Skewness		,123	,123	,123
Minimum		1	1	1
Maximum		36	5	5

**Table 4.3: Descriptive statistics of the international variables**

		Diffusion Neighbor (SSU)	Diffusion Neighbor (Adoption)	Diffusion Rel. Tradition (SSU)	Diffusion Rel. Tradition (Adoption)	Word Society
N	Valid	264	331	269	337	396
	Missing	132	65	127	59	0
Mean		,16583	,09229	,18401	,10453	48,64
Median		,00000	,00000	,00000	,00000	50,00
Mode		,000	,000	,000	,000	53
Std. Deviation		,296272	,234766	,270555	,236723	8,548
Skewness		1,709	2,715	1,457	2,649	-,316
Std. Error of Skewness		,150	,134	,149	,133	,123
Minimum		,000	,000	,000	,000	30
Maximum		1,000	1,000	1,000	1,000	64

#### 4.2.3 Correlations

Tables 4.4 and 4.5 show the correlations between all of the independent variables that were included in the study. Due to the fact that some variables were coded slightly differently than others, one table was created for the variables included in the analysis of same-sex unions and one table was created for those included in the model about the introduction of adoption rights for same-sex couples. Although there are some minor differences, both tables will be treated in a single discussion, as the general patterns in the correlations are quite similar. One of the first and most important things to observe is that all of the variables that address broad societal changes are significantly correlated: especially secularization and urbanization correlate strongly. The reason for these correlations does probably reflect empirical conditions. As an example, it is not unlikely that urbanized areas also have more secular populations or that – as was argued in the theoretical chapter – more secular populations also hold more favorable views towards the introduction of same-sex family policies. The correlations between these indicators of broad societal change are generally not so strong that it becomes impossible to separate one from the other. Although some of these correlations are rather high (above 0,600), the running of different models using different combinations of variables should still allow to meaningfully test the different hypothesis behind these variables.

**Table 4.4: Correlation table: the model for same-sex unions**

N - 211	Public opinion	Secularization	Human Development Index	Urbanization	LGBT movement	Government composition	Diffusion neighbor	Diffusion rel. tradition	World society
Public opinion	1								
Secularization	0,445**	1							
Human Development	0,500**	-0,040	1						
Urbanization	0,441**	0,639**	0,282**	1					
LGBT movement	0,169*	0,315**	0,066	0,257**	1				
Government composition	-0,018	0,128	-0,172**	-0,032	-0,182**	1			
Diffusion neighbor	0,088	-0,065	0,454**	-0,004	-0,105	0,006	1		
Diffusion rel. tradition	0,261**	0,092	0,482**	0,088	-0,182**	-0,004	0,756**	1	
World society	0,148*	-0,061	0,517**	-0,253**	-0,104	0,055	0,604**	0,623**	1

The measure for human development (the human development index) is, moreover, significantly correlated to almost all other variables in the models. Although the correlations do not usually reach problematic levels, the reason for this correlation is probably the nature of this index: as it combines measures of life expectancy, economic performance and educational attainment (Human Development Report, 2013), it is likely that even where one of these indicators is correlated with another variable – the two variables become (somewhat) correlated.

Finally, the international variables – the two on diffusion and the one on world society ties – are indeed significantly correlated – and rather strongly so in the model for same-sex unions. The correlation between the two variables measuring diffusion probably comes from the fact that countries in the same religious groups tend to (quite often) be on another's neighbors. Examples of this are Norway, Denmark and Finland, which are all neighbors of Sweden and in the same religious group. Although this explains the correlation, little could be done to resolve it. In order to be able to somewhat minimize these issues, several models both in and excluding these international variables were run.



**Table 4.5: Correlation table – the model for the introduction of adoption rights for same-sex couples**

N = 118	Public opinion	Secularization	Human Development	Urbanization	LGBT movement	Government composition	Diffusion neighbor	Diffusion rel. tradition	World society
Public opinion	1								
Secularization	0,706**	1							
Human Development	0,559**	0,155	1						
Urbanization	0,692**	0,758**	0,450**	1					
LGBT movement	0,291**	0,344**	0,147	0,264*	1				
Government composition	0,090	0,213**	-0,205*	-0,083	-0,052	1			
Diffusion neighbor	-0,035	-0,103	0,244	0,026	-0,258	1,161	1		
Diffusion rel. tradition	0,478*	0,321**	0,433**	0,323**	-0,062	0,120	0,467**	1	
World society	-0,015	0,102	0,134	-0,121	-0,095	0,069	0,499**	0,451**	1

#### **4.2.4: Standardization**

In order to facilitate the interpretation of the results and following Fernández & Lutter (2013), all variables were x-standardized<sup>6</sup>. This means that the scores on these variables were transformed into standard deviations, meaning that they are all measured on a comparable scale. Whilst this makes it somewhat harder to interpret the actual strengths of the variables, the relative influence on the hazard rate of the different variables becomes much easier to assess using standardized values.

---

<sup>6</sup> The descriptive statistics and correlation tables presented in this paragraph (2.3) were all calculated using the non-standardized variables: the standardization was only applied to the event-history analyses below.

## 4.3 Same-Sex Unions

### 4.3.1. Introduction

In total, a number of five models was run to analyze the introduction of same-sex unions. In models one through four, one or two more variables were added into the model. This was done for two reasons: firstly because it enables for an easier and deeper understanding of the actual results. Secondly, it allows for the comparison of the overall strength of new models in which variables were added. Furthermore a fifth model was run. The reason this model was included is that due to data limitations on the variables based on the World Values Survey (2013) and European Values Study (2013), public opinion and secularization, Luxembourg and Greece were excluded from models one through four. Especially Greece is an important country, as is it one of the two countries that has not yet introduced a same-sex family policy (see appendix 1), meaning that its exclusion might somewhat distort the results. The fifth model was thus run to include all countries (hence the larger N) in order to provide some test of the robustness of the results. Moreover, in order to facilitate the interpretation of the results, all variables were x-standardized. This means that the b in the models refers to z-scores. Whilst this makes it harder to exactly interpret how strong the measured variables are, it makes the interpretation of the relative strength of the variables much easier – as they are all measured on similar scales. The remainder of this section is used to discuss the results. This discussion has been split up into four sections. The first, brief, section discusses the overall strength of the models and offers some general remarks about these. The second and third section cover the results of the internal variables, with the second focusing on public opinion, secularization, urbanization and human development and the third focusing on variables that were derived from social movement theory: the strength of the LGBT movement and the composition of government. The fourth and final section subsequently takes up the discussion of the international variables: diffusion across neighboring countries, diffusion across countries with similar religious backgrounds and, finally, a country's connections to the 'world society'.

### 4.3.2. The overall models

Although the total number of year-country observations in the data set well exceeded 400, the total number of cases is much lower, since a country was dropped from the observation after it had introduced a policy (censored). The number of observations in the analysis stayed well above 200, however, meaning that it was more than high enough for statistical analysis. The number of explained events was 15 or 16 (depending on the model), which is a number of events that is quite often used in event history analysis. Moreover, the overall fit of the model increased significantly with every step (except for the fifth model, from which 2 variables were excluded). The -2 log likelihood of the null-model was 110,824, meaning that its decrease to only 58,321 in model four is really quite a substantial change. The implication is that rather than just finding some significant results, the models presented in the previous chapters really do go quite some way in explaining why Western-European countries introduce same-sex unions.

**Table 4.6: The Introduction of Same-Sex Unions in Western Europe between 1988 and 2010.**

Covariate	B (s.e.)	B (s.e.)	B (s.e.)	B (s.e.)	B (s.e.)
	Model 1:	Model 2:	Model 3:	Model 4:	Model 5:
Public Opinion:	<b>1,503**</b> (0,369)	<b>1,384**</b> (0,381)	<b>1,179*</b> (0,511)	<b>1,902*</b> (0,924)	
Secularization:				<b>6,208**</b> (2,023)	
HDI:		-0,039 (0,479)	-0,039 (0,664)	<b>2,652*</b> (1,303)	0,043 (0,570)
Urbanization:			<b>1,215*</b> (0,511)	0,570 (0,745)	<b>1,690**</b> (0,472)
LGBT Movement:	0,167 (0,341)	0,047 (0,345)	0,021 (0,383)	<b>-1,269*</b> (0,633)	0,297 (0,330)
Government Composition:	<b>0,612*</b> (0,278)	<b>0,876*</b> (0,351)	<b>0,923*</b> (0,367)	0,401 (0,423)	<b>0,718*</b> (0,339)
Diffusion neighbor:			-0,776 (0,564)	0,900 (0,951)	-0,184 (0,340)
Diffusion rel tradition:				<b>-1,976*</b> (0,788)	0,234 (0,287)
World society:		<b>-1,480*</b> (0,616)	-0,121 (0,864)	-0,072 (1,084)	-0,024 (0,829)
N: (Events)	211 (15)	211 (15)	211 (15)	211 (15)	249 (16)
-2 log likelihood <sup>7</sup>	92,672**	86,605*	78,388**	58,321**	95,481**

\* p < 0,05; \*\*p<0,01

#### **4.3.3. Societal changes: public opinion, secularization, human development and urbanization**

Speaking in purely statistical terms, public opinion has a significant effect on the hazard that a country introduces a same-sex union in models one through four. Urbanization is only significant in the third model and human development is only significant in the fourth model. Secularization is

<sup>7</sup> Significance indicates whether or not the change in the -2 log likelihood from the previous model is significant. For models one and five the significance indicates a change from the null-model.

significant in the fourth model – the only one it was included in. None of this is too interesting without a more substantial interpretation of these results, however.

The most striking result is the explanatory power of secularization – as its introduction in the model changes the results quite substantially and both its significance and explanatory power (b) are much better than those of any other variable in the model. Moreover, it seems that whilst urbanization might seem to influence the risk a country introduces a same-sex union, this is only when there is no control for secularization – since the moment secularization is included in the model, urbanization is no longer significant. Urbanization can probably be considered a societal change that is likely to occur together with other processes like secularization, but that does not in itself influence the Western Europe hazard a country introduces a same-sex union.

Public opinion, however, is more ‘resistant’ to the introduction of other variables to the model. This suggests that even when we control for urbanization, secularization and human development, public opinion has a significant influence on the hazard a country introduces a same-sex family policy.

Things get slightly more complicated where the results of the human development index are concerned: it only becomes significant (and has a high b, too) in the fourth model. A possible explanation for this is that – much like secularization – as people feel socio-economically secure (which is what the human development Index is meant to measure in this study), also become more tolerant towards homosexuality. The only reason I can come up with for human development not having a substantial impact on the introduction of same-sex unions in model two and three is that it may only become important in those cases that cannot be (too) readily explained by secularization: by this I mean that human developments only begins to matter for those cases where the degree of secularization cannot explain why a country does or does not introduce a same-sex family policy, which would suggest that (for example) somewhat religious but highly developed countries where people feel socio-economically secure may still introduce same-sex unions.

#### ***4.3.4. Social movements: the LGBT movement and political opportunities***

Departing from a statistical viewpoint, the left-right composition has a reasonably strong, stable and significant impact on the hazard a country introduces a same-sex union in all models but the fourth. The strength of the LGBT movement, however, is only statistically significant in the fourth model and is negative where a positive relationship was expected.

The most feasible explanation of this is probably that – as was somewhat expected and mentioned in the methodological chapter – this variable to some extent captures the size or degree of federalization of a country, rather than just the strength of the LGBT movement. Larger countries, after all, are more likely to have a larger number of LGBT organizations. At the same time, there is some empirical evidence to suggest that the larger a country, the slower it is in introducing same-sex unions (Fernández & Lutter, 2013). The implication of this is thus not that the LGBT movement does not matter in bringing about the introduction of same-sex unions, rather that better measures are needed.

The second variable that was derived from social movement theory – the composition of government- is quite strongly, significantly and strongly related to the introduction of same-sex unions in four of the five models. This suggests that the composition of government may have some influence, but also that it becomes much less (not) important once a control for secularization is added.

#### *4.3.5. International variables: neighboring countries, shared religious backgrounds and world society*

The results concerning the international variables are either mixed or even run opposite to the expected direction: the latter is true for world society ties in model two and for diffusion across countries with a similar religious background in model four.

Concerning the diffusion of same-sex family policies from one country to its neighboring countries, the results are quite clear, however: no significant relationship is found between the introduction of a same-sex family policy in a country and the hazard that a neighboring country introduces such a policy. This result suggests that the idea that policies diffuse or even spread from one close by country to the next, is not useful in explaining the introduction of same-sex family policies.

As for diffusion across countries with similar religious backgrounds, the relationship is – although not too robustly across models four and five- negative and significant at the  $p = 0,05$  level. This, of course, runs counter to the expected direction of the relationship. Even more problematically, the theoretical meaning of this result is even more puzzling: it suggests that when more countries with a similar religious background have introduced a same-sex union, a country becomes less likely to introduce a same-sex family policy. This result seems contra-intuitive at best and it is hard to conjure up a causal link that could explain this relationship. The solution to this rather puzzling result may lie in the way the variable was operationalized, however. Since the variable measures the percentage of countries in a group of countries with a similar religious background, two things could explain the negative correlation between the introduction of same-sex unions and diffusion across countries with religious backgrounds. Firstly, countries that are the first in their group to introduce a same-sex union, which automatically have low scores on this variable – and yet be very early in introducing same-sex family policies. Secondly, and in a similar vein, countries that introduce same-sex policies later (or not at all) face increasing numbers of neighboring countries that have already introduced the policy. The implication of this is that late introducers have higher scores on this variable. Does this then mean that no meaningful conclusion can be drawn based on these results? I would say not entirely. Although somewhat hesitantly, I would still argue that the results here at least suggest a disconfirmation of the hypothesis. The reason for this is that – even given the two problems that were just mentioned – had the diffusion across countries with similar religious background really mattered strongly, the expectation would still be that these different groups would more or less simultaneously introduce a same-sex union. Meaning, for example, that first all Lutheran countries would introduce a same-sex union, in which case rising scores on this variable would still increase the chance a country introduces a same-sex union. Moreover, the reverse effect found is more likely when some countries really do resist the pressure of countries with similar religious backgrounds introducing same-sex unions: as it is only when a country (for example Italy) does not introduce a same-sex union, in spite of the pressure of neighbors, that a higher score on the variable becomes associated with a lower chance of introduction a same-sex union. I would thus suggest that, although carefully, there is some reason to conclude that the introduction of same-sex unions is not caused by whether or not other countries with similar religious background have introduced such a same-sex union. This conclusion is consistent with the finding by Sluiter (2012, p. 153 ), who – using better methods – found no relationship between the introduction of same-sex unions and the introduction in countries with similar religious backgrounds in a somewhat similar study.

The third and final international explanation that was tested was the degree to which a country is ‘integrated’ into world society – measured by the number of human rights treaties a country had ratified in a given year. Whilst this is admittedly not a perfect measure, there seems to be very little

evidence to suggest that this integration into a human-rights oriented international community can explain the introduction of same-sex family policies in Western-Europe. This result is far from consistent with the findings by Fernández & Lutter (2013), who have found that the integration into world society does (strongly) influence the chance a country introduced a same-sex union. I can think of two reasons that could explain these different findings. The first is that Fernández and Lutter (2013) have used a somewhat better test, since they also include the number of international intergovernmental organizations a country is a member of. The second is more substantive and may be based on the fact that their study also includes a large number of Eastern European countries. These countries may on the whole be less integrated into world society and international organizations and at the same time they have introduced much less same-sex unions and Western-European countries, thus increasing the variation of this variable. The fact that it was skewed (see paragraph 4.2.2, p. 47) further reinforced the suspicion that was not enough variation on this variable among Western-European countries. All in all, the appropriate conclusion seems that although a country's integration into world society may not explain differences between Western European countries, this does not mean that it is not irrelevant in the study of the introduction of same-sex family policies – as a study with more variation on the variable did find an effect (Ibid.).

#### **4.3.6 Conclusion**

Overall, the internal variables fare much better than the international variables when it comes to the introduction of same-sex unions in Western Europe between 1988 and 2010. Especially secularization, human development and the composition of government come out as important in explaining why countries introduce same-sex unions. It should be noted, however, that both the results for social movements and the diffusion variables should be interpreted prudently, as there were some issues with their operationalization. Of course, the presentation of the results here is fairly superficial in that it does not fully consider the theoretical implication of these results. A more substantial discussion of the results – which also addresses the answers to both the sub-questions and main questions – can be found in the next chapter.

## 4.4 Adoption Rights for Same-Sex Couples

### 4.4.1. Introduction

Quite similarly to the analysis of the introduction of same-sex unions, the introduction of adoption rights for same-sex couples was done by running a total of five models. Overall, the results for the models run for same-sex unions and adoptions were quite similar, but there were some marked differences – which will be pointed out. So, once again, in order to facilitate the interpretation of the results, models one through four were run – with each model introducing a few more variables. The fifth model was once again introduced to make sure the exclusion of Greece and Luxembourg did not distort the results. Moreover, the variables in these models were x-standardized as well, to allow for a clearer interpretation of their relative strengths. Finally, much like the discussion of the results of the introduction of same-sex unions, the discussion of the results has been split up in to four sections. The first section contains some general remarks about the model, the second discusses the variables considering societal changes: public opinion, secularization, human development and urbanization. The third section then takes up the discussion of the variables that were derived from social movement theory: the strength of the LGBT movement and the composition of government. The fourth and final section is focused on (the problems with) the international variables: diffusion across neighboring countries, diffusion across countries with similar religious tradition and the degree of integration into world society.

### 4.4.2. The overall models

The analysis contained year-country observations between 1998 and 2010. The period under investigation starts later than the period that was considered with same-sex unions, simply because the first introduction of adoption rights in Western Europe only took place in 1999 – and considering the one year lag that was applied for most variables, this limits the analyzed period between 1998 and 2010. Moreover, once a country had introduced a given policy, it was dropped from the analysis. The remaining number of cases analyzed was 118 – which is enough for meaningful statistical analysis. It should be noted, however, that the number of explained events is only 10, which is not high. The results presented here might thus be quite strongly influenced by some introductions, even though the addition of Greece and Luxembourg in model five does suggest that the results remain quite robust when more countries are included. Moreover, similar studies have in the past used a similar number of events or policy introductions (Sluiter, 2012).

The increases in the -2 log likelihood scores also suggest that the models significantly contribute to explaining why countries introduce adoption rights for same-sex couples. All models (except for the second) constitute a significant improvement over the other models. Moreover, the -2 log likelihood of the null model was 82,619, which means that its reduction to 43,470 in model four constitutes quite a substantial improvement over the null-model.

**Table 4.7: The Introduction of adoption rights for same-sex couples in Europe between 1998 and 2010.**

Covariate	B (s.e.)	B (s.e.)	B (s.e.)	B (s.e.)	B (s.e.)
	Model 1:	Model 2:	Model 3:	Model 4:	Model 5:
Public Opinion:	<b>1,038**</b> (0,381)	1,118 (0,573)	1,427 (0,810)	1,528 (0,820)	
Secularization:				<b>3,399*</b> (1,675)	
HDI:		-,254 (0,920)	-1,405 (1,626)	2,073 (1,622)	1,465 (1,290)
Urbanization:			<b>1,796*</b> (0,784)	0,155 (0,754)	<b>1,411**</b> (0,532)
LGBT Movement:	0,060 (0,500)	-0,150 (0,595)	0,214 (0,635)	<b>-1,572*</b> (0,744)	0,406 (0,484)
Government Composition:	<b>0,794*</b> (0,341)	<b>1,042*</b> (0,459)	<b>1,361**</b> (0,476)	<b>1,498**</b> (0,518)	<b>1,201**</b> (0,417)
Diffusion neighbor:			-,0,745 (0,505)	-0,324 (0,738)	-0,692 (0,456)
Diffusion rel tradition:				<b>-1,739**</b> (0,630)	0,308 (0,355)
World society:		-,1344 (0,879)	0,466 (1,205)	-2,693 (1,666)	0,527 (1,080)
N: (Events)	118 (10)	118 (10)	118 (10)	118 (10)	142 (10)
-2 log likelihood <sup>8</sup>	68,895**	66,436	58,332*	43,470**	63,441**

\* p < 0,1; p < 0,05; p<0,01

#### **4.4.3. Societal changes: public opinion, secularization, human development and urbanization**

The results found in for adoption rights are somewhat different than those found for the introduction of same-sex unions: whilst public opinion and urbanization have a significant impact on

<sup>8</sup> Significance indicates whether or not the change in the -2 log likelihood from the previous model is significant. For models one and five the significance indicates a change from the null-model.



the hazard a country introduces adoption rights for same-sex couples in models one, two and three (and five), they lose their significance when secularization is brought into the models. This seems to confirm the idea that secularization is a process that influences public opinion, meaning that secularization is in a sense a deeper explanation for the introduction of same-sex family policies. This suggests that while public opinion did directly influence the hazard a country introduced a same-sex union, this is not the case for the hazard a country introduces adoption rights for same-sex couples. Furthermore, human development does not appear to have a significant effect on hazard a country introduces adoption rights for same-sex family policies – which is a difference with the findings for same-sex unions.

#### ***4.4.4. Social movements: the LGBT movement and political opportunities***

The results found here are once somewhat similar to those found for the introduction of same-sex unions. Although the strength of the LGBT movement is not significant in any of the models, its beta is still quite high in model four and the correlation is once again negative. This consistency across both of the fourth models suggest that the variable that attempted to capture the strength of the LGBT movement in fact partially captured either the degree of federalization or simply the size of the country.

Meanwhile, the composition of government once again proves to be one of the most robust (although not very strong) variables in influencing the hazard that countries introduce adoption rights for same-sex couples – suggesting that left-wing are indeed more likely to introduce same-sex family policies than right wing parties: contrary to the findings for same-sex unions, the variable stays significant throughout all (especially the fourth) model.

#### ***4.4.5. International variables: neighboring countries, shared religious backgrounds and world society***

As was the case with the internal explanations, the variables that are meant to capture the international explanations of the introduction of same-sex family policies show quite similar results when applied to either same-sex unions or adoption rights for same-sex couples.

These unexpected results once again suggest that there are some methodological problems with these variables that cause these negative relations. Again, though, I would still be tempted to argue that these problems may (partially) be aggravated when countries prove resistant against this kind of diffusion (as it is really only then that high scores on this variable become related to a later or no policy introduction). So, albeit with some serious reservations, it still seems that the evidence here disconfirms the hypotheses.

The final international variable in the model – world society ties – seems to once again be quite unrelated to whether or not countries introduce adoption rights for same-sex couples. With a fluctuating beta and failure to reach any kind of significance, which suggests it cannot explain differences in the introduction of adoption rights in Western-Europe in the period 1998 – 2010. It should be noted, however, that a country's integration into world society (which is what the variable is meant to capture) may still be important in explaining why Western-Europe has advanced so far in introducing same-sex family policies as a region (on a more global scale). Since only Western-European countries were investigated in this study, however, there is (for now) no further way to investigate this possibility.

#### ***4.4.6 Conclusion***

It seems that this study, which is one of the first that is aimed at explaining why Western-European

countries introduce adoption rights for same-sex couples, goes some way in showing that the introduction of these rights is caused by similar processes as the introduction of same-sex unions. There were some differences, however: especially the facts that public opinion seems less important and government composition seems more important for adoption rights than for same-sex unions is surprising. A possible explanation of these differences will be provided in the next chapter.

## 4.5 Conclusion

Although the analysis faced some methodological and data problems, there were still some rather substantial and important results to report. One of the most convincing is probably that the introduction of both same-sex unions and adoption rights for same-sex couples is caused by very similar processes. With a few exceptions, which have been mentioned above, both the variables, their significance and their changes across models follow very similar patterns. This seems to suggest that future studies of the subject (that might also focus on other same-sex family policies) would do well to draw on the existing literature on same-sex unions to study all kinds of same-sex family policies.

Another result is that national explanations perform much better than international explanations, which suggest that process within countries determine whether and when a country introduces a same-sex family policy in Western Europe. Of course, this conclusion should be drawn somewhat carefully, due to the methodological issues facing the measurement of (some of) these international explanations. Studies with more variation on the international variables may in the future help to further address this issue.

An additional conclusion is that, considering the national variables, processes of urbanization do not play too significant a role in the introduction of same-sex family policies. Rather, they seem to be caused by processes of secularization (and to some degree increasing socio-economic security)

Moreover, there were some unexpected differences in the results between same-sex unions on the one hand and adoption rights on the other. The most important were that where public opinion clearly and robustly influenced the hazard a country introduces a same-sex union, it did not have same effect for the introduction of adoption rights for same sex couples. The reverse, moreover, was true for the effect of

Concluding then, the models presented in this chapter provide a fairly substantial – although not flawless – explanation of why countries introduce same-sex family policies. This chapter has mainly served to present the main results and make some remarks about both the problems faced and the (superficial) interpretation of the models. Hoping to separate this discussion from both answering the (sub)questions in this study and from discussing the broader theoretical implications of this study, the next chapter provides with a more abstract (and substantive) discussion of the results presented in this chapter.

## Chapter 5: Discussion

---

### 5.1 Introduction

Having thus presented – and to some extent – interpreted the results of this study, this chapter moves on to first answer the sub-questions and then the main question of this study. It will also offer a possible explanation of the differences found between the introduction of same-sex unions and adoption rights for same-sex couples. The answer to the research question is not complete without a reflection on the limitations and theories that explain the introduction of same-sex family policies. That is why the remainder of this chapter is used to propose a more micro-level approach for the analysis of the introduction of same-sex family policies. The most important points made are that explanations of the introduction of same-sex family policies would do well to pay more attention to the way in which the institutional layout of a country determines who the *actors* are that can introduce same-sex family policies. As different actors are motivated by (somewhat) different motives, this influences the causal mechanisms that drive the introduction of same-sex family policies. Finally, the findings of this thesis are discussed to show how such a framework could deepen our understanding of why same-sex family policies are introduced.

## 5.2 Answers to the Sub-Questions

As we have seen in the previous chapter, the explanations for both same-sex unions and adoption rights for same-sex couples are quite similar. In order to facilitate the answering of these sub-questions, the answers to some of the sub-questions have been grouped into four brief discussions.

*Sub-Questions 1 A - D: Can broad societal changes (in public opinion, secularization, modernization and/or urbanization) explain the introduction of same-sex family policies in Western Europe?*

In the theoretical chapter, four possible processes were identified that might explain when countries introduce same-sex family policies. These were the changes in public opinion, secularization, modernization and urbanization. The answer to this sub-question is that such broad societal changes do indeed go quite some way in explaining the introduction of same-sex family policies in Western Europe. The finding in this regard is that whilst urbanization may both offer plausible causal explanations and may seem to influence in introduction of same-sex family policies, this is not necessarily the case. Especially secularization seems a particularly important process in explaining why countries do or do not introduce same-sex family policies. Moreover, modernization (measured as human development) also plays a role in the introduction of same-sex unions. It should be noted here, though, that the measure modernization also included the mean years of schooling in a country – which may partially explain how such processes influence a society's tolerance of certain groups. The correlations between these variables do indeed suggest that they influence (and possibly, cause or reinforce) one another.

Moreover, it should be noted that where public opinion consistently mattered for the introduction of same-sex unions, this was not the case for adoption rights. One possible explanation is that – especially in the countries under investigation – is that same-sex unions are a more salient issue than adoption rights for same-sex couples. The consequence of this could be, that because it causes less public debate, politicians are less focused on public opinion when introducing adoption rights. A study on the United States points in a similar direction (Wald, Button & Rienzo, 1996).

All in all, these findings tell a story of Western European countries that become increasingly secular and more economically secure, and in turn become more tolerant of issues such as homosexuality – processes that are then (finally) translated into same-sex family policies.

*Sub Questions 2 A - B: Can the strength of the LGBT movement and the political opportunities available to this movement explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

Unfortunately, the lack of appropriate data makes it impossible for this study to address the first part of this question: it remains unclear to what extent the LGBT movement is a key player in the introduction of same-sex family policies. Since almost all qualitative studies of the introduction of these policies, however, have emphasized the importance of the LGBT movement as both a force for change and a catalyst in the introduction of same-sex family policies (among others: Calvo, 2007; Kollman, 2007, 2009; Paternotte, 2008; Rydström, 2011; Tremblay et al., 2011), the LGBT movement remains an important possible explanation that deserves further academic attention. Especially efforts to more systematically document the membership numbers and annual turnover of the main LGBT organizations in European countries would be very welcome.

As for the opportunities of the same-sex movement: left-wing governments are more likely to

introduce same-sex family policies than centrist or right-wing governments. This finding is one of the more robust findings in this study and it – moreover – fits well with finding by the only other two studies to investigate the introduction of same-sex family policies in Western Europe (Fernández Lutter, 2013; Sluiter, 2012). There is, however, a difference between the introduction of same-sex unions and adoption rights for same-sex couples: as the composition of government was only significant across all models that analyzed the latter. Once again, the salience of the issue may provide an explanation: it could well be possible that as there was less public debate about the introduction of adoption rights for same-sex couples, there was also less attention for public opinion. This would then leave ‘room’ for politicians to more closely follow their ‘own’ convictions: which could explain why the composition of government had a more robust effect on the hazard a country introduced adoption rights for same-sex couples than on the hazard it introduced same-sex unions. Of course, more academic efforts are required to better understand this process, however: at the moment it is impossible to determine whether left wing governments are just more receptive to claims by the LGBT movement, or whether they are intrinsically more likely to introduce same-sex family policies – and to what extent adoption rights really are (or were in the countries in the analysis) a less salient issue than same-sex marriage. Whilst the answer to this issue is probably that left wing governments are both more receptive to claims of the LGBT movement *and* intrinsically more likely to introduce same-sex family policies, more research into these dynamics (like the work done by, for example Tremblay et al., 2011) is needed. This is especially true, because the composition of government really seems to be one of the more important (and robust) causes of the introduction of same-sex family policies.

*Sub-Questions 3 A-B: Can policy diffusion (across geographically close and culturally similar countries) explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

Earlier in this thesis, policy diffusion was split up into two possible kinds: diffusion along geographical lines and diffusion along culturally similar countries. The former was operationalized as the introduction in neighboring countries and the latter as the introduction in countries with a similar religious background. Whilst there were some issues with the operationalization of these variables, I still think the conclusion is appropriate that both kinds of diffusion do not effectively explain why Western European countries introduce same-sex family policies. This conclusion is – moreover – somewhat corroborated by Sluiter (2012, p. 153 ), who found a significant effect of geographical diffusion, that did -however- not add much explained variance and who found no evidence for the diffusion of same-sex family policies across countries with similar religious backgrounds. Finally, studies on the US have usually not found these kinds of diffusion to matter for the introduction of same-sex family policies (Haider-Markel, 2001)

*Sub-Question 4: Can a country’s integration into world society explain spatial patterns in the introduction of same-sex family policies in Western Europe?*

As was argued in the theoretical chapter of this thesis, a country’s integration into world society was taken into this study to accommodate a growing number of studies that are in some way concerned with the socialization of a country’s (political) elite in a setting of international organizations that promotes a discourse of human rights (Frank & McEneaney, 1996; Kollman, 2007, 2009; Kuhar, 2011 a, b). This thesis found no support for this explanation, however, as this finding may have been

caused by a lack of variation across the cases: an idea that finds some support in the fact that the variable was rather skewed to begin with. Furthermore, Europeanization theory (which I have listed in this category) suggests that (Western) Europe is an especially highly integrated region and for this reason may indeed be more advanced than other regions where the introduction of same-sex family policies is concerned (Kuhar, 2011 a, b; Major, 2005). For this study, however – which considered the not inconsiderable differences between Western-European countries, this explanation does not offer too much relevant information. As more – comparable and longitudinal – data may become available in the future (and as more countries continue to introduce same-sex family policies), studies including more countries could and should probably flesh out to what extent Europeanization or world society theory could explain the introduction of same-sex family policies in broader settings than Western-Europe alone.

### 5.3 Answering the Main Question and Introducing a Mirco-Level Approach

Having discussed the results of the different explanations of the introduction of same-sex family policies, the main question of this study can now be answered. In answering this question, a somewhat new approach for analyzing the introduction of same-sex family policies will be presented. The presentation of this framework will point out several gaps and problems in the current academic work being done on the introduction of same-sex family policies. These are either gaps in the knowledge that has so far been acquired or more serious problems in the way theoretical approaches to the introduction of same-sex family policies have been developed. The discussion of this framework will also allow for an assessment of the degree to which the findings of this study could be applied to the introduction of other policies and fits into the existing literature. As a reminder, the main question of this study is:

*What explains spatial patterns in the introduction of same-sex family policies in Western Europe between 1988 and 2010?*

The short answer to this question is that levels of secularization, modernization and the composition of government are the most important explanations of spatial patterns in the introduction of same-sex family policies. As we have just seen, some explanations (such as the strength of the LGBT movement) cannot be definitively ruled out, however. What these results do seem to suggest is that there are several explanations of different theoretical backgrounds (such as social movement theory, modernization theory and possibly world society theory) that apply to the introduction of same-sex family policies. One thing that almost all of these theories lack, however, is a parsimonious and overarching theoretical approach that takes in to account how exactly policies are made. Most of these explanations and theories fail to move beyond the idea – for example – that the secularization of society or pressure from the LGBT movement somehow translate into the introduction of same-sex family policies. Whilst the exact causal mechanisms behind these ideas may seem fairly obvious, it is important that they are both made much more explicit and more carefully investigated in order to deepen our understanding of why countries introduce same-sex family (and other) policies. In order to do this, the following section proposes a mirco-level approach that can be used to accommodate both the findings of this study and to help deepen our theoretical understanding behind these findings.

The main argument that this approach is built upon is that any explanation of why a same-sex family policy is introduced in a country should start by looking at where the decision to introduce a same-sex family policy is made. In the case of Western-Europe, these decisions are usually taken by (majority) government coalitions who make a proposal that is then voted on in parliament. In Western Europe, only Switzerland has so far put a same-sex family policy to the public through a referendum source – and Ireland may follow this precedent some time in 2014 (see the sources in appendix 1). The main reason for starting the analysis from governments (or parliaments) is that these constitute the *actors* that in the end decide on whether or not a same-sex family policy is introduced. Any theories or approaches that seek to then explain why same-sex family policies are introduced should then consider incentives, pressures and justifications or, more generally, reasons for (or personal characteristics of) politicians to introduce same-sex family policies. Taking this lens to look at the two level approach that has been dominant in the analysis of the introduction of same-



sex family policies, we can conceive of a decision making process that is layered: with national explanations constituting influences on, or incentives for politicians coming from 'below' and international explanations constituting influences on or incentives for politicians coming from 'above'. The idea that the decision-making around same-sex family policies should be regarded as an (increasingly) multi layered affair is not new and has been made by several authors. (Paternotte & Kollman, 2013; Fernández & Lutter, 2013). None of them really consider the theoretical importance of focusing on who are the actors that make the decisions, however. In order to somewhat flesh out a possible micro-level that is more actor centred, the findings that were shown to be important in this thesis will be discussed theoretically in this the following section.

Starting with the internal variables that I have listed under the heading of 'broad societal changes' – and especially the ones that proved to matter in this study, being public opinion, secularization and to some degree modernization, we immediately find the the variables that are most clearly in need of a stronger link to the actors involved in introducing same-sex family policies. Generally, I can conceive of three possible links that could explain why public opinion, secularization and modernization could have a significant impact on the decision by politicians to introduce same-sex family policies. The first is quite simply (and not too convincingly) that politicians in secular and modernized societies are probably more secular (and maybe more socio-economically secure) than politicians in less secular societies, meaning that they are intrinsically more likely to introduce same-sex family policies. The second – and most convincing- explanation falls back on what has been called the 'electoral link' (Lax & Phillips, 2009), in which politicians are assumed to be interested in winning (re)election. The consequence of this is that they are very concerned with the opinions that the public holds. If secularization leads to electorates that hold less religious values (see also: Fernández & Lutter, 2013) and thus become more likely to support same-sex family policies, it becomes clear that this provides an incentive for politicians to introduce these policies. A third possible explanation is that as societies become more secular and modernized, the LGBT movement becomes more acceptable to the public – thus enforcing the movement and its claims.

This, of course, brings us to the explanations offered by social movement theory that were discussed in this study: the strength of the LGBT movement and the political opportunities for this movement. The link to the politicians who introduce same-sex family policies is much more evident for these explanations. The LGBT movement can use campaigns and a wide array of lobbying efforts to attempt to pressure or convince politicians of the need to introduce same-sex family policies. That the LGBT movement indeed uses these kinds of policies to pursue its goals is both unsurprising and well documented (Tremblay et al., 2011). As for political opportunities, this study has found that left-wing governments are more likely to introduce adoption rights for same-sex couples than right-wing governments. Of course, this could be because these governments are more receptive of and better connected with (the claims of) the LGBT movement. Another explanation, however, may either be that left-wing politicians are for some reason more intrinsically likely to introduce same-sex policies, or that their electorates are (for example) more secularized or modernized, meaning that left-wing politicians may have stronger incentives to introduce same-sex family policies.

Future research on the influence of the LGBT movement would benefit immensely from two steps forward. The first would be a large and thorough collection of data on the strength of the LGBT movement across Europe to allow for a better cross-national study of the influence of this movement. No such study would be complete without a second, step, however. This step would be to just not operationalize the opportunities of the LGBT movement as whether or not there is a left-wing government, but to also include measures of the overall openness of the political system to

claims made by the movement (a point is similar to the point made by Paternotte (2011)).

Moving up to the international level, it seems that theories of policy diffusion have little to offer in terms of better understanding why same-sex family policies are introduced in a country. Apart from the – somewhat flawed- evidence in this thesis, this conclusion is further supported by a study on the United States (Haider-Markel, 2001) and to some extent by Sluiter (2012, p. 153). Although it seems unable to explain differences in the introduction of same-sex family policies in Western Europe, a country's integration into world society or an international human rights discourse may be a promising approach to the study of the introduction of same-sex family policies. Especially in explaining how and why Western Europe has advanced so far in comparison to other regions, theories of world society (Fernández & Lutter, 2013), Europeanization (Kuhar, 2011, a, b) or international norm diffusion (Kollman, 2007, 2009) seem to all provide possible and plausible explanations that deserve further exploration. Once again, however, more comparable and cross-national data would be required to really expand these analyses beyond their current (Western) European scopes. As for the connection to the politicians who decide whether or not a same-sex family policy is introduced in a country, this theory offer a fairly clear account: as politics becomes ever more internationalized, politicians are increasingly socialized in an international human rights discourse that increases their willingness to introduce same-sex family policies.

The above suggests that more carefully studying the exact causal mechanisms and actors that are behind the introduction of same-sex family policies may both make research clearer and allow future studies to go beyond the rather vague theories that currently dominate the field. In further fleshing out these explanations, another important issue should be considered: the fact that the 'borrowed' nature of the theories used for explaining the introduction of same-sex family policies means that the implications of these studies may well extend to other policy issues. One theory that offers such an expansion is offered by morality politics, although the results of this theory are mixed at best (Sluiter, 2012). I would argue that this lack of success might in part be explained by the fact that studies of morality policies quite often fail to take the political actors who introduce policies seriously. One lesson that can be drawn from the study of morality politics is the importance of the salience of issues: when issues draw a lot of public attention, the incentives and important actors for politicians change – and so do the reasons that politicians have for introducing policies. The importance of this in the study of gay rights has long been realized and argued for by scholars in the United States (Haider-Markel, 2001; Haider-Markel et al., 2007; Haider-Markel & Meier, 1996, 2003) and seems to equally apply to the differences found between the introduction of same-sex unions and adoption rights for same-sex couples in this thesis.

A final point I wish to hammer home is that this micro-level approach, which admittedly is still rather rough around the edges and needs further crystallization, is quite fundamentally institutionalist. After all, it is based on the assumption that explanations of the introduction of same-sex family policies depend on who introduces a same-sex family policy. In (Western) Europe this actor is usually a government coalition or parliament, but in other countries quite different actors have taken these decisions: ranging from constitutional or supreme courts to public referenda (Haider-Markel et al., 2007). There is some evidence to suggest that different institutional settings do indeed lead to somewhat different causal pathways (Ibid). More attention for the institutional settings in which same-sex family policies are introduced should thus help us to further understand how and why these policies are introduced.

## 5.4 Conclusion

Overall, the conclusion seems appropriate that this study has shown that processes of secularization, modernization and the composition of government all have quite an important impact on the introduction of same-sex family policies. It also goes some way in showing that the same-sex family policies that were studied in this thesis were all caused by somewhat similar processes. In spite of these findings, there are still considerable lacunae left to fill both in terms of internal and external explanations. Examples of such lacunae are the strength of the LGBT movement and the influence of international explanations. Moreover, the theoretical work that has so far been done could probably benefit from taking a more institutionalist and actor-centered approach: in which the institutional setting determines which actors are relevant in studying why same-sex family policies are introduced. This chapter has hoped to show how such a rethink could provide a stronger theoretical foundation of the results of this study and offer some guidance in identifying the most promising or pressing lines of inquiry for future research. Apart from the institutional settings and actors, the specific characteristics of certain policies should also be more carefully studied, as they seem to be likely to be key in determining differences in the introduction of different policies than same-sex family policies. The remaining chapter – the conclusion – will sum up the main findings of this study, reflect upon its strengths and weaknesses and offer some reflection on the generalizability of its findings.

## Chapter 6: Conclusion

---

The goal of this study has been to establish what explains spatial patterns in the introduction of same-sex family policies in Western Europe between 1988 and 2010. The main finding of this study is that public opinion and processes of secularization, modernization and the composition of government explain spatial patterns in the introduction of same-sex family policies in Western Europe. Other factors –like the strength of the LGBT movement- may still matter, but this study was unable to really shed a light on this process. Moreover, at least in explaining differences between and in Western Europe(an countries), it seems that explanations at the national level are a much more feasible and promising approach than international explanations. It should be noted, however, that methodological difficulties affected the analysis. Additionally, these international explanations may fare better in explaining why the whole of Western-Europe has advanced so far in the introduction of same-sex family policies in comparison to other global regions. Since these results have been discussed at length in the previous two chapters, this conclusion will mainly focus on the degree to which the results of this study can or might be generalized outside the Western-European setting. Moreover it will discuss the up-, and downsides of the more quantitative research methods that this study used to approach the introduction of same-sex family policies. Drawing from both of these discussion, the final part of the conclusion will both reflect upon the usefulness of introducing the concept of ‘same sex family policies’ and do some suggestions for the directions of future research. Whilst the main scope of this study has been on Western-Europe, the last chapter presented some arguments about the conditions that shape the causal pathways behind the introduction of same-sex family policies. The main argument was that the institutional layout of a country determines who the actors are that can introduce a same-sex family policy. If this line of reasoning is correct, then the conclusions of this thesis should apply to other countries with similar institutional settings and actors who introduce same-sex family policies: so in countries with democratically elected parliaments that introduce same-sex family policies at the national level. Theoretically speaking, there should thus be no reason to expect that the findings of this study would not equally apply to Eastern Europe, parts of Latin America and New-Zealand, as most countries in these regions meet these requirements. Future studies on these regions would probably mainly be qualitative in their approach (simply because no comparable longitudinal data is available) at this point, but may serve to better find out whether institutions and actors really are so pivotal, or whether other (cultural) factors matter too. Moreover, some of the findings and theory in this thesis may well apply to countries where same-sex family policies are introduced at the sub-national level: secularization or the composition of government may, for example, affect legislatures in American States in ways quite similar to the ones described in the previous chapter. All in all, the main focus of this study has obviously been on Western-Europe, but its results should theoretically apply outside this region too.

This study has followed the examples set by Sluiter (2012) and Lutter & Fernández (2013) in applying quantitative methods to the study of same-sex family policies (and many other policies in the case of Sluiter (2012)). The clearest advantage of these approaches and studies is that they allow for the assessment of the relative importance of the manifold of different possible explanations that has been put forward in the – mainly – qualitative literature, by comparing larger numbers of countries. I

feel the use of these methods has helped to move the field forward and could continue to do so in the future. More comparable, cross-national and longitudinal data both on more countries and on more variables is needed, however. Due to the fact that such data collection is an academic undertaking that would require large amounts of resources, qualitative approaches (especially in studying regions outside Western-Europe on which less data is available) will continue to offer valuable insights in the study of why countries introduce same-sex family policies. Such qualitative approaches may – moreover- still be needed to grasp some of the elements or aspects involved in the introduction of same-sex family policies. One such aspect could be – for example – the exact ways in which politicians come about deciding on introducing same-sex family policies, or documenting the precise and incredibly varied operations of the LGBT movement (for an example of a book that does just this, see Tremblay et al., 2011).

An issue all studies into the introduction of same-sex family policies share, be they quantitative or qualitative, is that they require a lot more attention to the way in which theories and concepts are used. Since the field of studies into gay-rights issues in general is still so young, there is an understandable (and necessary) tendency to draw upon pre-existing theory. This is not a bad thing in itself, but it has a tendency to lead to studies that seem to be using completely different theoretical angles, when in fact covering very similar subjects. The most important example of this are theories concerning the influence of the socialization of elites in an international (pro gay and) human rights discourse. Although there are some small differences between them, most seem to describe a very similar process. Yet, these have been labeled in all kinds of ways, ranging from world society (Fernández & Lutter, 2013), international norm diffusion (Kollman, 2007), policy convergence (Paternotte & Kollman, 2013) to Europeanization (Kuhar, 2008, 2011). This study has attempted to at least remark upon these similarities and to propose a micro-level approach that may first allow to better accommodate these different theoretical insights and second to better tease out the exact causal mechanisms in these similar theories.

In a similar vein, this study has attempted to single out ‘same-sex family policies’ as a distinct kind of policies that require their own theoretical framework. Whilst I feel the findings of this study at least suggest that these policies are probably introduced for quite similar reasons, more work is to be done on defining and investigating this ‘kind’ of policy. Firstly, this thesis has mainly considered the recognition of couples (same-sex unions) and their right to adopt children. There are quite some other policies that may be considered family policies. One such policy is the right for lesbian couples to conceive children using IVF and related technologies. Moreover, some studies have looked at policies that affect same-sex families adversely: these studies focus, for example, on the introduction of bans of same-sex marriage in American states (Haider-Markel & Meyer, 1996). Whether the introduction of such ‘averse’ policies is caused by similar (inversed) processes as the introduction of the same-sex family policies in this study, remains to be seen. Furthermore, a comparison with the introduction of both other gay-rights issues (such as anti-discrimination laws) and completely different policies is needed for two reasons. Firstly, because it is the only way in which it is possible to really see whether or not same-sex family policies indeed form such a distinct kind of policy. Secondly, it would probably improve the theoretical frameworks used to study these policies, as it would force scholars to think through the why and if different the introduction of different policies can be explained through similar or different processes. The study done by Sluiter (2012) is an example of a study that takes such an approach for the study of morality policies.

There are thus several ways in which future research on this topic could both proceed and be improved. As the field has moved to a point where it is coming increasingly clear why same-sex

family policies are introduced, it is important that more attention is paid to the exact causal mechanisms, institutions and actors that I think are pivotal in understanding and explaining the introduction of these policies.

Finally, it should be mentioned that this thesis has focused on the introduction of policies that have been improving the lives and rights of LGBT people and families across Western Europe. Since the first introduction of same-sex marriage in 2000 (in the Netherlands), the policy has spread across the globe, from countries as diverse as Argentina, Mexico, South Africa and Canada (BBC, 2010). Whilst all this seems to tell a global tale of improving lives and conditions for LGBT people, the actual situation is not as bright. Even in the European Union some countries like Poland, Italy and Greece seem to (quite persistently) resist the introduction of same-sex family policies (Chetaille, 2011; Fernández & Lutter, 2013). Moreover, and much more pressingly, Russia has recently started to move in the opposite direction and has introduced anti-LGBT legislation (BBC, 2013 c).

Homosexuality remains outlawed or even a capital crime in several other countries (The Guardian, 2011). What is striking is that – to my knowledge – virtually no academic work has yet been done on the countries that either regionally ‘lag behind’ in the introduction of same-sex family policies (with the possible exception of studies by Green (2013) and Kuhar (2011, a,b), or that even move in the opposite direction and clamp down on the rights of LGBT people. Understanding the causes of these developments (or lack thereof) could provide valuable insights into explaining the living conditions and rights of LGBT people across the globe. In addition to this such studies could possibly even yield important and new insights into the questions addressed in this study.

All in all then, this study has taken some steps in improving our understanding of why same-sex family policies are introduced. Both in this conclusion and in the discussion of the results, I hope to have shown not only the importance of this study, but also its limitations. During recent years some of the first and very important steps towards fully understanding these issues have been taken. As more and more scholars are starting to pay attention to same-sex family policies, I am sure many more steps will be taken at increasing speed over the next few years. My hopes are that with this thesis, I have been able to help take one such step.

## References

- ABC News. (2013). *NZ Legalises Same-Sex Marriage*. Date found: July 7, 2013: <http://www.abc.net.au/news/2013-04-17/nz-legalises-same-sex-marriage/4635086>.
- Allison, P. D. (1999). *Multiple Regression: A Primer*. Pine Forge Press: Thousand Oaks.
- Armingeon, K., Gerber, M., Leimgruber, P., and Beyeler, M. (2012). *The Comparative Political Data Set 1960-2010*. Institut für Politikwissenschaft, Bern.
- Baatrup, S. & Waaldijk, K. (2006). Major Legal Consequences of Marriage, Cohabitation and Registered Partnership for Different-Sex and Same-Sex Partners in Denmark. In: Digoix, M., Fassin, E., Festy, P., Stefánsson, K., and Waaldijk, K. (eds). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found: July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.
- BBC. (2010). *Gay Marriage Around the World*. Date found: July 7, 2013: <http://www.bbc.co.uk/news/world-21321731>.
- BBC. (2013 a). *Same-Sex Marriage: French Parliament Approves New Law*. Date found: July 17, 2013: <http://www.bbc.co.uk/news/world-europe-22261494>.
- BBC. (2013 b). *US Supreme Court in Historic Rulings on Gay Marriage*. Date found: July 17, 2013: <http://www.bbc.co.uk/news/world-us-canada-23068454>.
- BBC. (2013 c). *Russian Duma Passes Law Banning 'Gay Propaganda'*. Date found: July 17, 2013: <http://www.bbc.co.uk/news/world-europe-22862210>.
- Beck, N., Gleditsch, K., and Beardsley, K. (2006). Space is more than geography. Using spatial econometrics in the study of political economy, *International Studies Quarterly*, 50, 1, pp. 27–44.
- Beckfield, J.(2010). The Social Structure of the World Polity, *American Journal of Sociology*, 115, 4, pp. 1018 – 1068.
- Berry, F. & Berry, W. (1990). State Lottery Adoptions as Policy Innovations. An Event History Analysis, *The American Political Science Review*, 84, 2, pp. 395–415.
- Bierley, P. (1997). *World Churches Handbook*. BPC Wheaton Ltd: Exeter.
- Box-Steffensmeier, J. M. & Jones, B.S. (2004). *Event History Modeling: A Guide for Social Scientists*. Cambridge University Press: Cambridge.
- Brewer, P. R. (2003). The Shifting Foundations of Public Opinion About Gay Rights, *The Journal of Politics*, 65, 4, pp.1208 – 1220.
- Braun, D. & Gilardi, F.(2006). Taking 'Galton's Problem' Seriously. Towards a Theory of Policy Diffusion, *Journal of Theoretical Studies*, 18, 3, pp. 298 – 322.
- Calvo, K. (2007). Sacrifices that Pay: Polity Membership, Political Opportunities, and the Recognition of Same-Sex Marriage in Spain. *South European Society and Politics*, 12, 3, pp. 295 – 314.

- Calvo, K. & Trujillo, G. (2004). Fighting for Love Rights: Claims and Strategies of the LGBT Movement in Spain, *Sexualities*, 14, 5, pp. 562 – 579.
- Chetaille, A. (2011). Poland: Sovereignty and Sexuality in Post-Socialist Times. In: Tremblay, M., Paternotte, D., and Johnson, C., (eds). *The Lesbian and Gay Movement and the State: Comparative Insights into a Transformed Relationship*, Farnham: Ashgate, pp. 119 – 133.
- Corrales, J. & Pecheny, M. (2013). Six Reasons Why Argentina Legalized Gay Marriage First, *Americas Quarterly*. Date found: June 26, 2013: <http://www.americasquarterly.org/node/1753>.
- Craig, S. C., Martinez, M. D. and Kane, J. G. (2005). Core Values, Value Conflicts, and Citizen's Ambivalence about Gay Rights, *Political Research Quarterly*, 58, 1, pp. 5-17.
- Croucher, S. (2011). South Africa: Opportunities Seized in the Post-Apartheid Era. In: Tremblay, M., Paternotte, D., and Johnson, C. (eds). *The Lesbian and Gay Movement and the State: Comparative Insights into a Transformed Relationship*, Farnham: Ashgate, pp. 153 – 156.
- Diez, J. (2011). Argentina: A Queer Tango between the Lesbian and Gay Movement and the State. In: Tremblay, M., Paternotte, D., and Johnson, C. (eds). *The Lesbian and Gay Movement and the State: Comparative Insights into a Transformed Relationship*, Farnham: Ashgate, pp. 13 – 26.
- Digoix, M., Fassin, E. and Festy, P., Stefánsson, K., and Waaldijk, K. (eds). (2006). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.
- Eeckhout, B. & Paternotte, D. (2011). A paradise for LGBT rights? The Paradox of Belgium. *Journal of Homosexuality*, 58, 8, pp. 1059 - 1084.
- European Parliament. (2012). *European Parliament resolution of 13 March 2012 on equality between women and men in the European Union – 2011*. Date found: July 6, 2013: <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&reference=P7-TA-2012-0069&language=EN&ring=A7-2012-0041>.
- European Values Study. (2013). *About European Value Study*. Date found: July 7, 2013: <http://www.europeanvaluesstudy.eu/evs/about-evs/>.
- Fassin, E. (2001). Same Sex, Different Politics: “Gay Marriage” Debates in France and the United States, *Public Culture*, 13, 2, pp. 215 – 232.
- Fernández, J.J. & Lutter, M. (2013). Supranational Cultural Norms, Domestic Value Orientations and the Diffusion of Same-Sex Union Rights in Europe 1988 – 2009, *International Sociology*, 28, pp. 102-120.
- Festy, P. (2006). Legal Recognition of Same-Sex Couples in Europe, *Population (English Edition)*, 61, 4, pp. 417-453.
- Frank, D. J. & McEneaney, E. H. (1999). The Individualization of Society and the Liberalization of State Policies on Same-Sex Relations, 1984 – 1995, *Social Forces*, 77, 3, pp. 911-943.



Friedman, E. J. (2012). Constructing “The Same Rights with the Same Names”: the Impact of Spanish Norm Diffusion on Marriage Equality in Argentina, *Latin American Politics and Society*, 54, 4, pp. 29 – 59.

Finnemore, M. & Sikkink, K. (1998). International Norm Dynamics and Political Change. *International Organizations*, 52, 4, pp. 887 – 917.

Gilardi, F. & Füglistner, K. (2008). Empirical Modeling of Policy Diffusion in Federal States: The Dyadic Approach, *Swiss Political Science Review*, 14, 3, pp. 413-450.

Gray, V. (1973). Innovation in the States: a Diffusion Study, *The American Political Science Review*, 67, 4, pp. 1174 – 1185.

Green, J.C. (2013). *Antigay, Opposition to Gay Rights*. Date found: June 2<sup>nd</sup>, 2013: <https://www9.georgetown.edu/faculty/wilcoxc/green.PDF>.

Haider-Markel, D.P. (2001). Policy Diffusion as a Geographical Expansion of the Scope of the Conflict: Same-Sex Marriage Bans in the 1990s, *State Politics & Policy Quarterly*, 1, 1, pp. 5–26.

Haider-Markel, D.P. & Meier, K.J. (1996). The Politics of Lesbian and Gay Rights: Expanding the Scope of the Conflict, *Journal of Politics*, 58, 2, 332 349.

Haider-Markel, D.P. & Meier, K.J. (2003). Legislative Victory, Electoral Uncertainty: Explaining Outcomes in the Battles over Lesbian and Gay Civil Rights, *Review of Policy Research*, 20, 4, pp. 671-690.

Haider-Markel, D.P., Querze, A., and Lindaman, K. (2007). Lose, Win or Draw? A Reexamination of Direct Democracy and Minority Rights, *Political Research Quarterly*, 60, 2, pp. 304-314.

Holzhacker, R. (2011). ‘Gay Rights are Human Rights.’ The framing of new interpretations of international human rights norms. *Paper for presentation at the American Political Science Association*. Annual Meeting, Seattle, Washington, September 1-4, 2011.

Holzhacker, R. (2012). National and Transnational Strategies for LGBT Civil Society Organizations in Different Political Environments: Modes of Interaction in Western and Eastern Europe for Equality, *Comparative European Politics*, 10, pp. 23 - 47.

Huffington Post (2013). *Supreme Court Gay Marriage Rulings Come Out (LIVE UPDATES)*. Date found: June 26, 2013: [http://www.huffingtonpost.com/2013/06/26/supreme-court-gay-marriage\\_n\\_3455001.html?utm\\_hp\\_ref=gay-voices&ir=Gay%20Voices](http://www.huffingtonpost.com/2013/06/26/supreme-court-gay-marriage_n_3455001.html?utm_hp_ref=gay-voices&ir=Gay%20Voices).

Human Development Index. (2013). *Human Development Index (HDI)*. Date Found: June 20, 2013: <http://hdr.undp.org/en/statistics/hdi/>.

Human Development Report. (2013). *Statistical Annex*. Date found: July 3, 2013: [http://hdr.undp.org/en/media/HDR2013\\_EN\\_Statistics.pdf](http://hdr.undp.org/en/media/HDR2013_EN_Statistics.pdf).

ILGA-Europe. (2013 a). *ILGA-Europe Rainbow Map – Explanatory Document*. Date found: July 18, 2013: [http://www.ilga-europe.org/home/publications/reports\\_and\\_other\\_materials/rainbow\\_europe](http://www.ilga-europe.org/home/publications/reports_and_other_materials/rainbow_europe).

ILGA-Europe. (2013 b). *Annual Reports*. Date found: July 12, 2013: [http://www.ilga-europe.org/home/about\\_us/organisational\\_documents/annual\\_reports](http://www.ilga-europe.org/home/about_us/organisational_documents/annual_reports).

Independent, The. (2013). *France: Huge Gay Marriage Protest Turns Violent*. Date found: June 26, 2013: <http://www.independent.co.uk/news/world/europe/france-huge-gay-marriage-protest-turns-violent-in-paris-8632878.html>.

Inglehart, R. (2008). Changing Values among Western Public from 1970 to 2006, *West European Politics*, 31, pp. 130 – 146.

Isik, I., Zheng, T. (2008). *Ratification of International Human Rights Treaties*. Available at: <http://www1.umn.edu/humanrts/research/ratification-index.html#N>.

Kollman, K. (2007). Same-sex Unions: The Globalization of an Idea, *International Studies Quarterly*, 51, 2, pp. 329 – 257.

Kollman, K. (2009). European Institutions, Transnational Networks and National Same-Sex Union Policy: When Soft Law Hits Harder, *Contemporary Politics*, 15, 1, pp. 37 – 53.

Kuhar, R. (2011). “Resisting Change: Same-Sex Partnership Policy Debates in Croatia and Slovenia, *Südosteuropa*, 59, 1, pp. 24-48.

Kuhar, R. (2011). Use of the Europeanization Frame in Same-Sex Partnership Issues across Europe. In: Forest, M. & Lombardo, E. *The Europeanization of Gender Equality Policies: Discursive-Sociological Approach*. Palgrave-Macmillan: Basingstoke, pp. 255 - 286.

Major, C. (2005). Europeanisation and Foreign and Security Policy - Undermining or Rescuing the Nation State? *Politics*, 25, 3, pp. 175 – 190.

Manches. (2013). *Civil Partnerships and Children. Guidance from the Family Law Experts at Manches*. Date found: July 6, 2013: <http://www.manches.com/Content/Resources/files/Civil%20Partnerships%20and%20Children.pdf>.

McAdam, D., Tarrow, S. and Tilly, C. (2003). Dynamics of Contention, *Social Movement Studies: Journal of Social, Cultural and Political Protest*, 2, 1, pp. 99 – 102.

Meyer, J.W., Boli, J., Thomas, G. M. and Ramirez, F.O. (1997). World Society and the Nation State, *American Journal of Sociology*, 103, 1, pp. 144 – 181.

Mooney, C. Z. (2001). Modeling Regional Effects on State Policy Diffusion, *Political Research Quarterly*, 54, 1, pp. 103 -124.

Mooney, C. Z. & Lee, M. H. (1999). Morality Policy Reinvention: State Death-Penalties, *The ANNALS of the American Academy of Political and Social Science*, 566, 1, pp. 80 – 92.

LA Times. (2013). *South Africa’s Path to Marriage Equality. A Court Judge Justice Recalls how the Country Came to Legalise Same-Sex Marriage*. Date found: July 7, 2013: <http://articles.latimes.com/2013/jun/13/opinion/la-oe-sachs-gay-marriage-south-africa-20130613>.

Lax, J.R. & Phillips, J.H. (2009). Gay Rights in the States, Public Opinion and Policy Responsiveness, *American Political Science Review*, 103, 3, pp. 367 – 386.

Laws.com. (2013). *The Ultimate Gay Adoption Guide*. Date found: July 7, 2013:  
<http://adoption.laws.com/gay-adoption>.

Lee, TT. & Hicks, G.R. (2011). An analysis of Factors Affecting Attitudes Toward Same-Sex Marriage: Do the Media Matter? *Journal of Homosexuality*, 58, 10, pp. 1391 – 1408.

Lewis, G.B. & Seong Soo Oh. (2008). Public Opinion and State Action on Same-Sex Marriage, *State and Local Government Review*, 40 1 42 53.

Paternotte, D. (2008). *Revendiquer le <<mariage gay>>. Belgique, France, Espagne*. Éditions de l'Université de Bruxelles: Brussels.

Paternotte, D. (2011). Belgium, the Paradoxal Strength of Disunion. In: Tremblay, M., Paternotte, D., and Johnson, C. (eds). *The Lesbian and Gay Movement and the State: Comparative Insights into a Transformed Relationship*. Farnham: Ashgate, pp. 43 – 56.

Paternotte, D. (Forthcoming). *The Globalization of Same-Sex Marriage*.

Paternotte, D. & Kollman, K. (2013). Regulating Intimate Relationships in the European Polity: Same-sex Unions and Policy Convergence, *Social Policy*, first published online: march, 2013.

Petersen, T. (1991). The Statistical Analysis of Event Histories, *Sociological Methods Research*, 19, 3, pp. 270 – 323.

Plataformia Cidadania Casamento. (2 010). *Thousands Protest Portugal's Upcoming Gay Marriage Law*. Date found: June 26, 2013:  
[http://www.casamentomesmosexo.org/index.php?option=com\\_content&view=article&id=395:thousands-protest-portugals-upcoming-gay-marriage-law-on-top-online-english&catid=5:noticias&Itemid=5](http://www.casamentomesmosexo.org/index.php?option=com_content&view=article&id=395:thousands-protest-portugals-upcoming-gay-marriage-law-on-top-online-english&catid=5:noticias&Itemid=5).

Reuters. (2013). *Gay Couples Win Limited Adoption Rights*. Date found: July, 6, 2013:  
<http://www.reuters.com/article/2013/05/17/us-portugal-gayadoption-idUSBRE94G0KV20130517>.

Risse, T., Ropp S.C. and Sikkink, K. (1999). *The power of Humans Rights: International Norms and Domestic Change*. Cambridge University Press: Cambridge.

Rydström, J. (2008). Legalizing Love in a Cold Climate: The History, Consequences and Recent Developments of Registered Partnership in Scandinavia. *Sexualities*, 11, pp. 193 – 226.

Rydström, J. (2011). *Odd Couples. A History of Gay Marriage in Scandinavia*. Askant Public Publishers, Amsterdam University Press: Amsterdam.

Saez, M. (2011). General Report: Same-Sex Marriage, Same-Sex Cohabitation, and Same-Sex Families Around the World: Why “Same” is so Different, *American University Journal of Gender, Social Policy and the law*, 19, 1, pp. 115 – 141.

Scherpe, J. M. (2007). The Nordic Countries in the Vanguard of European Family Law, *Scandinavian*

*Studies in Law*, 50, pp. 265 – 288.

Sluiter, R. (2012). *The Diffusion of Morality Policies among Western-European Countries between 1960 and 2010. A Comparison of the Temporal and Spatial Diffusion Patterns of Six Morality and Eleven Non-morality Policies*. Iskamp Drukkers B.V. : Enschede.

Smith, M. (2005). Resisting and Reinforcing Neoliberalism: Lesbian and Gay Organising at the Federal and Local Levels in Canada, *Policy and Politics*, 33, 1, pp. 75 – 93.

Steele, F. (2005). *Event History Analysis*. Centre for Multilevel Modelling, University of Bristol, Bristol. Date found: July 7, 2013: <http://eprints.ncrm.ac.uk/88/1/MethodsReviewPaperNCRM-004.pdf>.

Swissinfo. (2012). *Rainbow Families: Gays Granted More Adoption Rights*. Date found: July 6, 2013: [http://www.swissinfo.ch/eng/swiss\\_news/Gays\\_granted\\_more\\_adoption\\_rights.html?cid=3418306](http://www.swissinfo.ch/eng/swiss_news/Gays_granted_more_adoption_rights.html?cid=3418306).

Stefánsson, K. & Eydahl, G.B. (2003). *Restrained Reform - Securing Equality for Same-Sex Couples in Iceland*. Conference paper. Date found: July 6, 2013: <https://same-sex.web.ined.fr/pdf/KHS-GBE.pdf>.

Takács, J. & Szalma, J. (2011). Homophobia and same-sex partnership legislation in Europe, *Equality, Diversity and Inclusion*, 30, 5, 356 – 278.

Tarrow, S. G. (1994). *Power in Movement. Social Movements and Contentious Politics*. Cambridge University Press: New York.

The Guardian. (2011). *Persecuted for Being Gay: The voices from people around the world who have found themselves stigmatized for their sexuality*. Date found: July 17, 2013: <http://www.guardian.co.uk/world/2011/sep/13/persecuted-for-being-gay>.

The Guardian. (2013). *Supreme Court Rejects Gay Marriage Challenge as Pride Parades Kick Off*. Date found: July 7, 2013: <http://www.guardian.co.uk/world/2013/jun/30/supreme-court-rejects-gay-marriage-pride>.

Toward Freedom. (2010). Argentina Passes Gay Marriage Law. Date found: July 7, 2013: <http://www.towardfreedom.com/home/americas/2030-argentina-passes-gay-marriage-law>.

Tremblay, M., Paternotte, D., and Johnson, C.(eds). (2011), *The Lesbian and Gay Movement and the State: Comparative Insights into a Transformed Relationship*. Farnham: Ashgate.

True, J. & Mintrom, M. (2002). Transnational Networks and Policy Diffusion: The Case of Gender Mainstreaming, *International Studies Quarterly*, 45, 1, pp. 27 -57.

University of San Francisco. (2009). *Spain Defends LGBT Rights in Latin America*. Date found: July 17, 2013: [http://www.usfca.edu/Newsroom/Research/Spain\\_Defends\\_LGBT\\_Rights\\_in\\_Latin\\_America/](http://www.usfca.edu/Newsroom/Research/Spain_Defends_LGBT_Rights_in_Latin_America/).

UPI. (2013). *Same-Sex Marriage Bill Provokes Fistfight in French Parliament*. Date found: July 17, 2013: [http://www.upi.com/Top\\_News/World-News/2013/04/19/Same-sex-marriage-bill-provokes-fistfight-in-French-Parliament/UPI-65411366393317/](http://www.upi.com/Top_News/World-News/2013/04/19/Same-sex-marriage-bill-provokes-fistfight-in-French-Parliament/UPI-65411366393317/).

Volden, C. (2006). States as Policy Laboratories: Emulating Success in the Children's Health Insurance Program, *American Journal of Political Science*, 50, 2, pp. 294 – 312.

- Waaldijk, K. (2001). Small Change: How the Road to Same-Sex Marriage Got Paved in the Netherlands. In: Wintemute and Andenæs (eds). *Legal Recognition of Same-Sex Partnerships: A Study of National, European and International Law*, pp. 437– 464. Hart Publishing: Oxford and Portland.
- Waaldijk, K. (2004). Others May Follow: The Introduction of Marriage, Quasi-Marriage and Semi-Marriage for Same-Sex Couples in European Countries, *Judicial Studies Institute Journal*, 5, 104-125.
- Wald, K. D., Button, J. W. and Rienzo, B. A. (1996). The Politics of Gay Rights in American Communities: Explaining Antidiscrimination Ordinances and Policies, *American Journal of Political Science*, 40, 4, pp. 1152 – 1178.
- Walker, J.L. (1969). The Diffusion of Innovations among the American States, *The American Political Science Review*, 63, 3, pp. 880 – 899.
- World Bank. (2013). *Urban Population (% of total)*. Date found: July 12, 2013: <http://data.worldbank.org/topic/urban-development>.
- World Values Survey. (2013). *Countries Participating in EVS 1981 – 2008 and WVS 1981 – 2008 (alphabetic order)*. Date found: July 7, 2013: [http://www.asep-sa.org/wvs/EVS-WVS\\_ParticipatingCountries.pdf](http://www.asep-sa.org/wvs/EVS-WVS_ParticipatingCountries.pdf).
- Ytterberg, H. & Waaldijk, K. (2006). Major Legal Consequences of Marriage, Cohabitation and Registered Partnership for Different-Sex and Same-Sex Partners in Sweden. In: Digoix, M., Fassin, E., Festy, P., Stefánsson, K. and Waaldijk, K. (eds). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.

## Appendix 1: The Introduction of Same-Sex Family Policies

This appendix contains information on the introduction of same-sex family policies in 18 Western European Countries. With the exception of the report by Digoix et al. (2006), there are no recent and thorough academic legal reviews of the introduction of same-sex family policies in different countries. That is why not only academic publications, but also news reports, governmental documents and reports by activists were used to collect the data below. Where found, the titles of the law concerned are mentioned. The date of introduction was coded as the date parliament decided (not the day the law came into effect), since this is the event explained in this thesis. Although this study only runs until 2010, the information was added to be as recent as possible. The last update of the data was on July 7, 2013.

### Austria:

Registered Partnership:	17-11-2009. <i>Eingetragene Partnerschaft-Gesetz</i> (Fernández & Lutter, 2013; Global post, 2010)
Same-Sex Marriage:	No law
Stepchild Adoption:	No law 2013 EHCR ruling may require change to laws (Amnesty 2013)
Joint Adoption:	No Law

### Belgium:

Registered Partnership:	23-11-1998 <i>Loi du 23 novembre 1998 instaurant la cohabitation légale</i> (Fernández & Lutter, 2013)
Same-Sex Marriage:	13-02-2003 <i>Loi ouvrant le mariage à des personnes de meme sexe et modifiant certaines disposition du code civil</i> (Fernández & Lutter, 2013; Festy, 2006)
Stepchild Adoption:	13-02-2003: <i>Loi ouvrant le mariage à des personnes de meme sexe et modifiant certaines disposition du code civil</i> (De Schutter & Waaldijk, 2006; Fernández & Lutter, 2013; Festy, 2006)
Joint Adoption:	12-2005 - (BBC, 2006)

### Denmark:

Registered Partnership:	06-07-1989 <i>Lov om registrered partnerskab</i> (Fernández & Lutter, 2013; Festy, 2006)
Same-Sex Marriage:	07-06-2012

	- (Copenhagen Post, 2012)
Stepchild Adoption:	02-06-1999 <i>Act no. 360 at the 2 June 1999</i> (Baatrup & Waaldijk, 2006)
Joint Adoption:	26-05-2010 <i>Act No. 537 of 26.05.2010</i> (Jeppensen de Boer & Kronberg, 2012)
<b>Finland:</b>	
Registered Partnership:	09-11-2001 <i>Laki rekisteröidystä parisuhteesta</i> (Fernández & Lutter, 2013; Festy, 2006)
Same-Sex Marriage:	No law
Stepchild Adoption:	Before 09-2009 - (Rydström, 2011, p. 149)
Joint Adoption:	No law
<b>France:</b>	
Registered Partnership:	13-02-2003 <i>Loi no 99-944 du 15 novembre 1999 relative au pacte civil de solidarité.</i> (Borillo & Waaldijk; Fernández & Lutter, 2013;)
Same-Sex Marriage:	12-02-2013 <i>Loi no 2013-404 du 17 mai 2013, ouvrant le mariage aux couples de personnes de même sexe</i> (CBC News, 2013; Legifrance, 2013)
Stepchild Adoption:	12-02-2013 <i>Loi no 2013-404 du 17 mai 2013, ouvrant le mariage aux couples de personnes de même sexe</i> (CBC News, 2013; Legifrance, 2013)
Joint Adoption:	12-02-2013 <i>Loi no 2013-404 du 17 mai 2013, ouvrant le mariage aux couples de personnes de même sexe</i> (CBC News, 2013; Legifrance, 2013)
<b>Germany:</b>	
Registered Partnership:	16-02-2001 <i>Gesetz zur Beendigung der Diskriminierung gleichgeschlechtlicher Sexualität: Lebenspartnerschaften</i> (Fernández & Lutter, 2013; Festy, 2006)
Same-Sex Marriage:	No law (Siegfried & Waaldijk, 2006)
Stepchild Adoption:	15-12-2004 <i>Gesetz zur Überarbeitung des</i>

### *Lebenspartnerschaftsrechts*

(Rechtliches, 2004)

Joint Adoption:

No law

But since 2013: rights similar to joint adoption  
(DW, 2013)

#### **Greece:**

Registered Partnership:

No law

(Fernández & Lutter, 2013)

Same-Sex Marriage:

No law

(Fernández & Lutter, 2013)

Stepchild Adoption:

No law

Joint Adoption:

No law

#### **Iceland:**

Registered Partnership:

12-06-1996

Staðfest Samvist

(Festy, 2006)

Same-Sex Marriage:

14-06-2006

Lög Nr. 14, júní 2006 um breytingu á lagaákvæðum *er varða réttarstöðu samkynhneigðora*

(Rydström, 2011, p. 208)

Stepchild Adoption:

1999

*Alþingistíðindi 1999-2000A: 860*

(Stefánsson & Eydahl, 2003)

Joint Adoption:

14-06-2006

Lög Nr. 14, júní 2006 um breytingu á lagaákvæðum *er varða réttarstöðu samkynhneigðora*

(Rydström, 2011, p. 149)

#### **Ireland:**

Registered Partnership:

01-07-2010

*Civil Partnership and Cohabitation Bill*

(BBC, 2010)

Same-Sex Marriage:

No law

Possible Referendum in 2014

(Irish Independent, 2013)

Stepchild Adoption

No law

(Citizen Information, 2013)

Joint Adoption

No law

(Citizen Information, 2013)

#### **Italy:**

Registered Partnership:

No Law

(Fernández & Lutter, 2013)



Same-Sex Marriage:	No law Fernández & Lutter, 2013
Stepchild Adoption:	No law
Joint Adoption:	No law
<b>Luxembourg:</b>	
Registered Partnership:	09-07-2004 <i>Loi du 9 juillet 2004 relative aux effets légaux de certains partenariats</i> (Fernández & Lutter, 2013)
Same-Sex Marriage:	No law Issue under consideration (Gay Star News, 2013; Wort, 2013)
Stepchild Adoption:	No law Issue under consideration (Gay Star News, 2013; Wort, 2013)
Joint Adoption:	No law Issue under consideration (Gay Star News, 2013; Wort, 2013)
<b>Netherlands:</b>	
Registered Partnership:	17-12-1997 <i>Wet van 17 december 1997 tot aanpassing van wetgeving aan de invoering van het geregistreerd partnerschap in boek 1 van het Burgerlijk Wetboek.</i> (Fernández & Lutter, 2013)
Same-Sex Marriage:	21-12-2000 <i>Wet openstelling huwelijk</i> (Fernández & Lutter, 2013; Waaldijk, 2006)
Stepchild Adoption:	12-12-2000 <i>Wet openstelling huwelijk</i> (Fernández & Lutter, 2013; Waaldijk, 2006)
Joint Adoption:	21-12-2000 <i>Wet openstelling huwelijk</i> (Fernández & Lutter, 2013; Waaldijk, 2006)
<b>Norway:</b>	
Registered Partnership:	30-03-1993 <i>Registrert Partnerskap</i> (Fernández & Lutter, 2013)
Same-Sex Marriage:	27-06-2008 <i>Lov 2008-06-27 om ekteskap</i> (Fernández & Lutter, 2013)
Step Child Adoption:	15-06-2001 <i>Act of June 15 2001: no 36</i> (Asland & Waaldijk, 2006)

Joint Adoption:	27-06-2008 <i>Lov 2008-06-27 om ekteskap</i> (Fernández & Lutter, 2013; Rydström, 2011, p. 149)
<b>Portugal:</b>	
Registered Partnership:	No law
Same-Sex Marriage:	11-02-2010 <i>Lei no 9/2010 de 31 de Maio- Permite o casamento civil entre pessoas do mesmo sexo</i> (Portugalgay, 2010)
Stepchild Adoption:	17-05-2013 - (Reuters, 2013)
Joint Adoption:	No law (Reuters, 2013)
<b>Spain:</b>	
Registered Partnership:	No law (Fernández & Lutter, 2013)
Same-Sex Marriage:	13-06- 2005 <i>Ley 13/2005, de 1 de Julio, por la que se modifica el Código Civil en material de derecho a contraer matrimonio</i> (Fernández & Lutter, 2013)
Stepchild Adoption:	13-06- 2005 <i>Ley 13/2005, de 1 de Julio, por la que se modifica el Código Civil en material de derecho a contraer matrimonio</i> (Fernández & Lutter, 2013; New York Times, 2005)
Joint Adoption:	13-06- 2005 <i>Ley 13/2005, de 1 de Julio, por la que se modifica el Código Civil en material de derecho a contraer matrimonio.</i> (Fernández & Lutter, 2013; New York Times, 2005)
<b>Sweden:</b>	
Registered Partnership:	23-06-1994 <i>Lag 1994: 1117 Om registrerad partnerskap</i> (Fernández & Lutter, 2013; Festy, 2006)
Same-Sex Marriage:	09-2008 <i>2008/09: 80 Äktenskapsfrågor</i> (Fernández & Lutter, 2013)
Stepchild Adoption:	06-06-2002 <i>The Act (2002: 603) amending the Registered Partnership Act</i> (BBC, 2002; Ytterberg & Waaldijk, 2003)
Joint Adoption:	06-06-2002 <i>The Act (2002: 603) amending the Registered Partnership Act</i> (BBC, 2002; Ytterberg & Waaldijk, 2003)

## Switzerland:

Registered Partnership:	2004 <i>Ordonnance sur la mise en oeuvre de la loi du 18 juin 2004 sur le partenariat dans la prévoyance professionnelle vieillesse survivants et invalidité</i> (Fernández & Lutter, 2013)
Same-Sex Marriage:	No law
Stepchild Adoption:	12-2012 - (Swissinfo, 2012)
Joint Adoption:	No law - (Swissinfo, 2012)

## United Kingdom

Registered Partnership:	18-11-2004 <i>The Civil Partnership Act 2004</i> (Fernández & Lutter, 2013; Festy, 2006 <sup>9</sup> )
Same-Sex Marriage:	No law Issue under considerations (BBC, 2013)
Stepchild Adoption:	18-11-2004 <i>The Civil Partnership Act 2004</i> (Fernández & Lutter, 2013; Festy, 2006; Manches, 2013) <sup>8</sup>
Joint Adoption:	18-11-2004 <i>The Civil Partnership Act 2004</i>

## References:

Amnesty International. (2013). *Austria: Reform Needed after European Court Adoption Victory for Lesbian Couple*. Date found: June 6, 2013: <http://www.amnesty.org/en/news/austria-reform-needed-after-european-court-adoption-victory-lesbian-couple-2013-02-19>.

Asland, J. & Waaldijk, K. (2006). Major Legal Consequences of Marriage, Cohabitation and Registered Partnership for Different-Sex and Same-Sex Partners in Norway. In: Digoix, M., Fassin, E., Festy, P., Stefánsson, K., and Waaldijk, K. (eds). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.

BBC. (2002). *Sweden Legalises Gay Adoption*. Date found: July 7, 2013: <http://news.bbc.co.uk/2/hi/europe/2028938.stm>.

---

<sup>9</sup> Legislation in the United Kingdom sometimes varies per region. Where there were differences, the legal provision for England was selected.

BBC. (2006). *Belgium Passes Gay Adoption Law*. Date found: July 6, 2013:  
<http://news.bbc.co.uk/2/hi/europe/4929604.stm>.

BBC. (2010). *Civil partnership bill backed by Irish politicians The Dail in the Irish Republic has passed a bill recognising civil partnerships between same-sex couples*. Date found: July 6, 2013:  
<http://www.bbc.co.uk/news/10484404>.

BBC. (2013). *Gay Marriage Bill: Peers back Government Plans*. Date found: July 6, 2013:  
<http://www.bbc.co.uk/news/uk-politics-22764954>.

Baatrup, S. & Waaldijk, K. (2006). Major Legal Consequences of Marriage, Cohabitation and Registered Partnership for Different-Sex and Same-Sex Partners in Denmark. In: Digoix, M., Fassin, E., Festy, P., Stefánsson, K., and Waaldijk, K. (eds). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.

Borillo, D. & Waaldijk, K. (2006). Principales conséquences juridiques du mariage, de la cohabitation et du partenariat enregistré pour les partenaires de sexe différent et de même sexe en France. In: Digoix, M., Fassin, E., Festy, P., Stefánsson, K., and Waaldijk, K. (eds). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.

CBC News. (2013). *France's Parliament Passes Gay Marriage Bill. Legislation Would Also Allow Same-Sex Couples to Adopt*. Date found: July 6, 2013:  
<http://www.cbc.ca/news/world/story/2013/02/12/france-gay-marriage-adoption.html>.

Citizen Information. (2013). *Adoption and Cohabiting Couples*. Date found: July 6, 2013:  
[http://www.citizensinformation.ie/en/birth\\_family\\_relationships/cohabiting\\_couples/adoption\\_and\\_unmarried\\_couples.html](http://www.citizensinformation.ie/en/birth_family_relationships/cohabiting_couples/adoption_and_unmarried_couples.html).

Copenhagen Post. (2012). *Gay Marriage Legalised*. Date found: June 6, 2013:  
<http://cphpost.dk/news/national/gay-marriage-legalised>.

De Schutter, O. & Waaldijk, K. (2013). Major Legal Consequences of Marriage, Cohabitation and Registered Partnership for Different-Sex and Same-Sex Partners in Belgium. In: Digoix, M., Fassin, E., Festy, P., Stefánsson, K., and Waaldijk, K. (eds). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.

Digoix, M., Fassin, E., Festy, P., Stefánsson, K., and Waaldijk, K. (eds). (2006). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.

DW. (2013). *Germany Strengthens Gay Adoption Rights*. Date found: July 6, 2013:  
<http://www.dw.de/germany-strengthens-gay-adoption-rights/a-16612531>.

- Festy, P. (2006). Legal Recognition of Same-Sex Couples in Europe, *Population (English Edition)*, 61, 4, pp. 417-453.
- Gay Star News. (2013). *Fighting for Gay Rights and Marriage in Luxembourg*. Date found: July 6, 2013: <http://www.gaystarnews.com/article/fighting-gay-rights-and-marriage-luxembourg050413>.
- Global Post. (2010). *A Straight Austrian Couple Wants a Same-Sex Marriage*. Date found: July 6, 2013: <http://www.globalpost.com/dispatch/europe/100218/austria-same-sex-marriage>.
- Hiltunen, R & Waaldijk, K. (2006) Major Legal Consequences of Marriage, Cohabitation and Registered Partnership for Different-Sex and Same-Sex Partners in Finland. In: Digoix, M., Fassin, E., Festy, P., Stefánsson, K., and Waaldijk, K. (eds). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.
- Irish Independent. (2013). *Referendum on Gay Marriage to be held in 2014*. Date found: July 6, 2013: <http://www.independent.ie/irish-news/referendum-on-gay-marriage-to-be-held-in-2014-29364000.html>.
- Jeppesen de Boer & C.G., Kronborg, A. (2012). National Report: Denmark. *American University Journal of Gender, Social Policy and the Law*, 19, 1, pp. 113 – 121.
- Legifrance. (2013). *Dossiers législatifs - LOI n° 2013-404 du 17 mai 2013 ouvrant le mariage aux couples de personnes de même sexe*. Date found: July 6, 2013: <http://www.legifrance.gouv.fr/affichLoiPreparation.do?idDocument=JORFDOLE000026587592&type=contenu&id=2>.
- Manches. (2013). *Civil Partnerships and Children. Guidance from the Family Law Experts at Manches*. Date found: July 6, 2013: <http://www.manches.com/Content/Resources/files/Civil%20Partnerships%20and%20Children.pdf>.
- New York Times. (2005). *Spain Gives Approval to Gay Unions*. Date found: July 6, 2013: [http://www.nytimes.com/2005/06/30/world/europe/30iht-spain.html?\\_r=1&](http://www.nytimes.com/2005/06/30/world/europe/30iht-spain.html?_r=1&).
- Portugalgay. (2010). *Lei Nº9/2010 de 31 de Maio - Permite o casamento civil entre pessoas do mesmo sexo*. Date found: July 6, 2013: <http://portugalgay.pt/politica/parlamento07x.asp>.
- Rechtliches. (2013). *Gesetz zur Überarbeitung des Lebenspartnerschaftsrechts*. Date found: July 6, 2013: [http://www.rechtliches.de/info\\_Gesetz\\_zur\\_ueberarbeitung\\_des\\_Lebenspartnerschaftsrechts.html](http://www.rechtliches.de/info_Gesetz_zur_ueberarbeitung_des_Lebenspartnerschaftsrechts.html).
- Reuters. (2013). *Gay Couples Win Limited Adoption Rights*. Date found: July, 6, 2013: <http://www.reuters.com/article/2013/05/17/us-portugal-gayadoption-idUSBRE94G0KV20130517>.
- Rydström, J. (2011). *Odd Couples. A History of Gay Marriage in Scandinavia*. Askant Public Publishers, Amsterdam University Press: Amsterdam.
- Siegfried, D. & Waaldijk, K. (2006). Major Legal Consequences of Marriage, Cohabitation and Registered Partnership for Different-Sex and Same-Sex Partners in Germany. In: Digoix, M., Fassin, E.,

Festy, P., Stefánsson, K., and Waaldijk, K. (eds). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.

Stefánsson, K. & Eydahl, G.B. (2003). *Restrained Reform - Securing Equality for Same-Sex Couples in Iceland*. Conference paper. Date found: July 6, 2013: <https://same-sex.web.ined.fr/pdf/KHS-GBE.pdf>.

Swissinfo. (2012). *Rainbow Families: Gays Granted More Adoption Rights*. Date found: July 6, 2013: [http://www.swissinfo.ch/eng/swiss\\_news/Gays\\_granted\\_more\\_adoption\\_rights.html?cid=3418306](http://www.swissinfo.ch/eng/swiss_news/Gays_granted_more_adoption_rights.html?cid=3418306).

Waaldijk, K. (2006). Major Legal Consequences of Marriage, Cohabitation and Registered Partnership for Different-Sex and Same-Sex Partners in the Netherlands. In: Digoix, M., Fassin, E., Festy, P., Stefánsson, K., and Waaldijk, K. (eds). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.

Wort. (2013). *Luxembourg MPs to Vote on Gay Marriage before Summer*. Date found: July 6, 2013: <http://www.wort.lu/en/view/luxembourg-mps-to-vote-on-gay-marriage-before-summer-511379afe4b07d8f8fd39654>.

Ytterberg, H. & Waaldijk, K. (2006). Major Legal Consequences of Marriage, Cohabitation and Registered Partnership for Different-Sex and Same-Sex Partners in Sweden. In: Digoix, M., Fassin, E., Festy, P., Stefánsson, K., and Waaldijk, K. (eds). *Les couples homosexuels et l'enregistrement de leur union Rapprochement avec les couples hétérosexuels et recherche comparative internationale*: INED. Date found July 6, 2013: <https://same-sex.web.ined.fr/pdf/GipReport/RapportGip2006Def.pdf>.

## Appendix 2: Code Book

This appendix provides information on the way the dataset used in this thesis was coded. All of the variables used are described briefly.

### Country name:

AU	=	Austria
BE	=	Belgium
DE	=	Denmark
FI	=	Finland
FR	=	France
GE	=	Germany
GR	=	Greece
IC	=	Iceland
IR	=	Ireland
IT	=	Italy
LU	=	Luxemburg
NL	=	Netherlands
NO	=	Norway
PO	=	Portugal
SWe	=	Sweden
SWi	=	Switzerland
SP	=	Spain
UK	=	United Kingdom

### Year:

Variable that indicates the year of measurement of a country/case. Range = 1988 – 2010.  
(In the Analysis the range used is 1988 – 2005)

### SSU:

Binary variable that indicates whether or not a country had introduced a same-sex union (SSU: registered partnership or marriage). A score of 0 means no policy was in place, a score of 1 means a policy was introduced.

### Adoption Rights:

Binary variable that indicates whether or not a country had introduced stepchild or full adoption rights. A score of 0 means no policy was in place, a score of 1 means a policy was introduced. It should be noted that the introduction of stepchild adoption in Finland, and Germany was also coded as a '1'.

### Public Opinion

Variable that is an aggregation based on answers to the question “do you think homosexuality is justifiable?”. Answers ranged from 1 (“never”) to 10 “always”. The variable was dichotomized into two categories with 1- 7 indicating no public support and 8 – 10 indicating public support. The

relatively high threshold was chosen, because the variable is used to capture support for same-sex family policies (which goes a step further than just homosexuality). For each available country-year, the percentage of people who agree with the statement was coded into a 0 – 1 scale with 3 decimals, with a higher score indicating higher public support. Data was derived from the European Values Study and World Values Survey<sup>1011</sup>, large cross-national surveys that were each done in four waves (European Values Study, 2011, 2013a; World Values Survey, 2009). Data points between the waves were interpolated using linear interpolation. The waves do not always match (Icelandic data for the 1981 wave comes from surveys in 1984), but data were always coded for the year they were collected in (so the Icelandic score from the 1981 wave was coded in 1984). Several of the 18 countries under study were not included in the first wave, meaning that the data for the scores from 1988 to 1989 were extrapolated using the slope of the data in those countries between 1990 and 1999. Moreover the scores for (2009) and 2010 for all countries were extrapolated, too. Finally, no or insufficient data were available for Luxembourg and Greece.

### Secularization

Variable that is an aggregation based on answers to the question “how often do you attend religious services?” Answers came in eight categories (never, practically never; once a year; other specific holidays; Christmas/Easter day; once a month, once; once a week; more than once a week). The variable was dichotomized into two categories, with people visiting services less than once a month called ‘secular’ and people visiting religious services once a month or more as ‘religious’. Although people who visit religious services less than once a month may still be religious, the interest for this thesis lies with religious convictions that are strong enough to influence views on the introduction of same-sex family policies. That is why only regular attendance of religious services was coded as religious. For each available country-year, the percentage of ‘secular’ people was coded was coded into a 0 -1 scale with 3 decimals, with a higher score indicating a higher degree of secularization. Data was derived from the European Values Study (2011; 2013a) and World Values Survey (2009), each of which was done in four waves. Data points between the waves were interpolated using linear interpolation. The waves do not always match (Icelandic data for the 1981 wave comes from surveys in 1984), but data were always coded for the year they were collected in (so the Icelandic score from the 1981 was coded in 1984). Several of the 18 countries under study were not included in the first wave, meaning that the data for the scores from 1987 to 1989 were extrapolated using the slope of the data in those countries between 1990 and 1999<sup>1</sup>. Moreover, the scores for (2009 and) 2010 were extrapolated for all countries. Finally, no or insufficient data were available for Luxembourg and Greece.

### Urbanization

This is a variable on a scale from 0 – 1, with three decimals. It measures the percentage of people that live in urban areas as a percentage of the total population. The year-country data comes from the World Bank (2013) Development Indicators, which uses the aid of national statistical agencies and measures the percentage of people living in urban agglomerations.

### Human Development Index:

Variable constructed on a scale from 0 – 1, with three decimals. Data were only available for the years 1980, 1990, 2000, 2005, 2007 and 2010. Missing years were interpolated linearly. The data

<sup>10</sup> A list of participating countries can be found at (World Values Survey, 2013)

<sup>11</sup> An overview the survey waves and data can be found at (European Values Study, 2013b)



come from table two (Human Development Report, 2013, p. 148) of the statistical annex of the 2013 Human Development Report, as it contains a calculation of the Human Development Index that has been coded consistently over time – making comparisons over time possible (Ibid., p. 140).

#### Number of Gay and Lesbian Organizations

This variable measures the number of organizations that was registered with ILGA-Europe in 2009 – 2010 in a given country (ILGA-Europe, 2010, p. 46-47). Unfortunately, earlier annual reports did not list the member organizations of ILGA Europe (see: ILGA-Europe, 2013)<sup>12</sup>, meaning that registered number of organizations in 2010 was coded as a constant for each country. Obviously, this is a very crude measure to capture the strength of the gay and lesbian movement. For the time being, however, the collection of better data (on, for example the number of members or the budgets of organization in all 18 countries between 1988 and 2010), would require a research effort well beyond the scope of this study.

#### Government Composition

Variable that ranges from 1 to 5. Data and coding come from the Comparative Political Data Set (Armingeon et al., 2012). The composition of a government is measured as the percentage of cabinet portfolios held by centre, or right wing parties on the one hand and left wing parties on the other. The lower the score, the more right-wing the government, the higher the score, the more left wing it is. In years where the introduction of a policy coincided with a government change, the composition of the government that introduced the policy was used. This means that there are two variables (one for same-sex unions and one for adoption rights), since these policies were sometimes introduced in different years.

#### Introduction in a geographically close country

Variable that ranges from 0 – 1, with three decimals. It measures the percentage of neighboring countries that had introduced a same-sex family policy in a given year. Since the years of introduction of same-sex unions on the one hand and adoption rights for same sex couples on the other vary somewhat, two variables were created. The total number of neighboring countries varies per country. Countries were coded as neighbors when they shared land borders, meaning that – for example – Ireland and the United Kingdom are each other's (only) neighbors, and that Germany had a total of nine neighbors. Some countries have neighboring countries that are outside of the region under study and these non Western-European countries were included in the calculations. Some of them (like Hungary (Reuters, 2007)) had even introduced a same-sex union before their Western European neighbors. Moreover, Denmark and Sweden were coded as neighbors, as the two countries are connected by a bridge.

#### Introduction in a similar country

Variable that ranges from 0 – 1, with three decimals. It measures the percentage of other countries with the same religious background as a country that has introduced a same-sex family policy in a given year. Since the years of introduction of same-sex unions on the one hand and adoption rights for same sex couples on the other vary somewhat, two variables were created. The date came from the world churches handbook (Bierley, 1997) and the number of members of a given religious tradition in a given years was used to determine a countries religious background. Members were

---

<sup>12</sup> A request for more information on these member organizations was sent to ILGA Europe, but no response was received.

defined as those who had taken some active step to become a member of a church and membership numbers were reported at five-year intervals between 1960 and 2010 (ibid. p. 10). Both using other measures of membership (that were more or less inclusive and provided in the same data set) did not change the categorization of countries into five distinct groups, however. These groups were the following: predominantly catholic (8 countries), predominantly (Lutheran) protestant (5 countries), mixed (3 countries), Anglican (1 country) and Greek-Orthodox (1 country)<sup>13</sup>.

#### Integration into world society

Variable that ranges from 30 to 64. It measures the total added number of Human Rights treaties or covenants a country had ratified or become a member of in a given year. Data comes from the ratification index (Isik & Zheng, 2008). The index was last updated in 2008 (ibid), meaning that the 2008 scores for countries were also coded for 2009 and 2010. Given the very small number of treaties signed between 2004 and 2008, this seemed a better approach than some kind of linear extrapolation (based on a longer period of time), since the ratification of these human rights treaties does not seem to follow a linear pattern.

#### **References:**

Armingeon, K., Gerber, M., Leimgruber, P., and Beyeler, M. (2012). *The Comparative Political Data Set 1960-2010*. Institut fur Politikwissenschaft, Bern.

Bierley, P. (1997). *World Churches Handbook*. BPC Wheaton Ltd: Exeter.

European Value Study. (2011). *European Values Study Longitudinal Data File 1981-2008*. GESIS Data Archive: Cologne.

European Values Study. (2013a). *About European Value Study*. Date found: July 7, 2013: <http://www.europeanvaluesstudy.eu/evs/about-evs/>.

European Values Study. (2013b). *Surveys*. Date found: July 7, 2012: <http://www.europeanvaluesstudy.eu/evs/surveys/>.

Human Development Report. (2013). *Statistical Annex*. Date found: July 3<sup>rd</sup>, 2013: [http://hdr.undp.org/en/media/HDR2013\\_EN\\_Statistics.pdf](http://hdr.undp.org/en/media/HDR2013_EN_Statistics.pdf).

ILGA-Europe. (2010). *Annual Report for 2009-2010*. Correlio Printing: Brussels.

ILGA-Europe. (2013). *Annual Reports*. Date found: July 12, 2013: [http://www.ilga-europe.org/home/about\\_us/organisational\\_documents/annual\\_reports](http://www.ilga-europe.org/home/about_us/organisational_documents/annual_reports).

Isik, I., Zheng, T. (2008). *Ratification of International Human Rights Treaties*. Available at: <http://www1.umn.edu/humanrts/research/ratification-index.html#N>.

Reuters. (2007). Hungary Legalizes Same-Sex Civil Partnerships. Date found: July 5, 2013: <http://in.reuters.com/article/2007/12/18/us-hungary-gay-idINL1861742220071218>.

---

<sup>13</sup> The countries per group (using the abbreviations presented above were the following: Predominantly catholic: AU, BE, FR, IR, IT, LU, PO, SP. Predominantly (Lutheran) protestant: DE, FI, IC, NO, SWe. Mixed: GE, NL, SWi. Anglican: UK. Greek-Orthodox: GR.

World Bank. (2013). *Urban Population (% of total)*. Date found: July 12, 2013:  
<http://data.worldbank.org/topic/urban-development>.

World Values Survey (2009). *World Values Survey 1981 – 2008*. World Values Survey Association.  
Aggregate File Producer: ASEP/JDS, Madrid.

World Values Survey. (2013). *Countries Participating in EVS 1981 – 2008 and WVS 1981 – 2008 (alphabetic order)*. Date found: July 7, 2013: [http://www.asep-sa.org/wvs/EVS-WVS\\_ParticipatingCountries.pdf](http://www.asep-sa.org/wvs/EVS-WVS_ParticipatingCountries.pdf).