

Commonwealth Citizenship, Immigration Status, and Electoral Eligibility: A Legal Analysis of Q Manivannan's Election to the Scottish Parliament**Anurag Yadav¹ *****Dr. Rais Ahmad², Lalit Hari Mishra³, Dr. Manmeet Kaur⁴****¹²³⁴ Department of Political Science; Gandhi Faiz-e-Aam P.G. College, Shahjahanpur (U.P.), India / Bareilly College, Bareilly (U.P.)- India****¹Anuragyadav12122002@gmail.com**** <https://orcid.org/0009-0005-2588-2008>****²drraisahmad22@gmail.com**** <https://orcid.org/0009-0008-2746-4848>****³lalitharimishra@gmail.com**** <https://orcid.org/0009-0002-2285-283X>****⁴manmeet.bly@gmail.com**** <https://orcid.org/0009-0007-4370-5309>****<https://doi.org/10.63939/JSS.2026-Vol10.N41.149-164>****Received: 10/08/2026, Accepted: 14/09/2026, Published: 16/09/2026**

Abstract: The election of Q Manivannan to the Scottish Parliament in 2026 provides a useful case study for examining the relationship between nationality, immigration status, devolved electoral law, and constitutional allegiance. This article argues that the legal position cannot be explained merely by reference to Commonwealth citizenship. The decisive development is the Scottish Elections (Representation and Reform) Act 2025, which extended candidacy rights at Scottish elections to foreign nationals holding limited leave to remain, subject to the wider statutory qualifications and disqualifications. The analysis therefore distinguishes nationality-based eligibility from immigration permission and from the separate question of whether an elected office is treated as employment under UK immigration rules. Current Home Office Immigration Rules expressly provide that standing for or filling an elected post in local or devolved government or legislatures is not employment for immigration-rule purposes. The article further develops the comparative constitutional dimension by examining Articles 9, 84 and 173 of the Constitution of India, the Citizenship Act 1955, and section 84 of the Scotland Act 1998 concerning the oath of allegiance. It argues that the UK and Indian systems locate political membership within different constitutional logics: Scotland permits a limited form of electoral inclusion that is not coextensive with citizenship, whereas India links legislative eligibility and the constitutional consequences of foreign citizenship to Indian citizenship. The case consequently illuminates a broader constitutional divergence between residence-based democratic inclusion and citizenship-based political membership.

Keywords: Commonwealth citizenship; Q Manivannan; Scottish Parliament; immigration status; electoral eligibility; MSP.

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مواطنة دول الكومنولث، والوضع الهجري، والأهلية الانتخابية: تحليل قانوني لانتخاب "كيو. مانيفانان"

لعضوية البرلمان الإسكتلندي

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ملخص: شهدت الانتخابات البرلمانية الإسكتلندية سنة 2026 حدثاً بارزاً للغاية بانتخاب "كيو مانيفانان" لعضوية البرلمان الإسكتلندي وهو ما طرح قضية العلاقة القائمة بين الجنسية والوضع الهجري وقانون الانتخابات المفوض والولاء الدستوري، وسنحاول في هذا المقام أن نبرز مركزها القانوني أين لا يمكن تفسيره بأنه الإستثناء في دول الكومنولث، على اعتبار أن التطور الحاصل في قانون الانتخابات الإسكتلندي (التمثيل والإصلاح) لسنة 2025، الذي وسع نطاق حقوق الترشح ليشمل الرعايا الأجانب الحاصلين على إذن بقاء محدود شريطة إستيفائهم المؤهلاء وغياب الموانع القانونية للترشح، لذلك سنعرض من خلال تحليلنا بين الأهلية القائمة على الجنسية من جهة وإذن الهجرة من جهة أخرى، وبين مدى اعتبار المنصب الانتخابي عملاً وظيفياً بموجب قواعد الهجرة في المملكة المتحدة، خاصة وأن قواعد الهجرة الحالية الصادرة عن وزارة الداخلية البريطانية تنص على أن الترشح لشغل منصب انتخابي أو تولي منصب في الحكومات المحلية، أو الحكومات المفوضة، أو الهيئات التشريعية لا يُعد عملاً وظيفياً لأغراض قواعد الهجرة، وإنطلاقاً من ذلك سنعمق في هذا المقال البُعد الدستوري المقارن عبر فحص المواد (9) و(84) و(173) من دستور الهند، وقانون الجنسية الهندي لعام 1955، والمادة (84) من قانون إسكتلندا لعام 1998 المتعلقة بيمين الولاء، وقد خلصت الدراسة لعدة نتائج أبرزها أن النظامين البريطاني والهندي يحددان العضوية السياسية وفقاً لمنطقتين دستوريتين مختلفتين، حيث تسمح إسكتلندا بشكل محدود بالإدماج الانتخابي الذي لا يتطلب بالضرورة المواطنة، في حين يربط النظام الهندي بين الأهلية التشريعية والآثار الدستورية المترتبة على حمل جنسية أجنبية وبين الجنسية الهندية ذاتها، وعليه نسلط الضوء في هذه الحالة على ذلك التباين الدستوري الأوسع بين الإدماج الديمقراطي القائم على الإقامة، والعضوية السياسية القائمة على الجنسية.

الكلمات المفتاحية: مواطنة الكومنولث؛ كيو. مانيفانان؛ البرلمان الإسكتلندي؛ الوضع الهجري؛ الأهلية الانتخابية؛ عضو البرلمان الإسكتلندي (MSP).

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1. Introduction

Citizenship ordinarily functions as a central legal marker of political membership. It determines, among other matters, access to electoral participation and eligibility for public office. The Scottish constitutional order, however, complicates a simple citizenship-based model. The rules governing membership of the Scottish Parliament have historically distinguished between British citizenship and other legally recognised categories, including qualifying Commonwealth citizens, while subsequent Scottish legislation has progressively widened candidacy rights for foreign nationals.

Q Manivannan's election as a Scottish Green Party MSP for Edinburgh and Lothians East in May 2026 makes this legal architecture especially significant. The Scottish Parliament records Manivannan as a sitting MSP from 7 May 2026 and records that, at the Parliament's first meeting, they made a solemn affirmation of allegiance. The official parliamentary record therefore establishes the election, membership and constitutional oath; it does not, by itself, establish the precise immigration status held at nomination or polling. Any statement concerning a student visa must consequently be treated as a reported fact requiring evidential support rather than as an uncontested legal premise.

The central argument of this article is that the legal question is more precise than whether an Indian citizen may simply become an MSP. The analysis requires three separate inquiries: first, whether the individual falls within a statutory category entitled to stand; second, whether the individual holds the immigration permission required by the relevant statutory regime; and third, whether any immigration conditions restrict the performance of the elected role. These questions must then be considered alongside the constitutional significance of the oath of allegiance and India's rules concerning foreign citizenship.

The comparative dimension is equally important. The United Kingdom does not operate through a single codified constitutional text, and Scottish electoral eligibility is distributed across the Scotland Act 1998, Scottish electoral legislation and related rules. India, by contrast, expressly constitutionalises citizenship and legislative qualifications. Article 9 of

the Constitution of India addresses the effect of voluntary acquisition of foreign citizenship, while Articles 84 and 173 expressly require Indian citizenship for membership of Parliament and State Legislatures. The comparison therefore concerns not merely two electoral systems, but two different constitutional conceptions of political membership.

2. Research Questions and Methodological Framework

This study adopts a doctrinal legal research design combined with a comparative constitutional approach. The doctrinal component identifies, interprets and synthesises the statutory rules governing candidacy, membership, immigration status, citizenship and the oath of allegiance. Primary materials include the Scotland Act 1998, the Scottish Elections (Franchise and Representation) Act 2020, the Scottish Elections (Representation and Reform) Act 2025, the British Nationality Act 1981, the Representation of the People Act 1983, the Constitution of India and the Citizenship Act 1955. Official parliamentary materials and Electoral Commission guidance are used to establish the institutional and electoral context.

The comparative constitutional component places the Scottish framework alongside the Indian constitutional framework. Comparison is undertaken through functional categories rather than by assuming that the two systems are institutionally identical. The analysis focuses on (i) the legal source of electoral eligibility, (ii) the relationship between nationality and residence, (iii) the treatment of foreign citizenship, (iv) the constitutional significance of allegiance, and (v) the relationship between legislative office and immigration status.

The research also employs a source-critical method. Where public reporting concerning Manivannan's immigration status is not corroborated by an official primary source, the article does not treat the reported status as conclusively established. This distinction is important because the legal consequences of a Student route permission depend upon the interaction between the Immigration Rules and the statutory rules governing Scottish elections. The article therefore separates established legal propositions from factual assertions requiring independent verification.

The study is analytical rather than empirical. It does not claim to establish the private immigration file, nomination papers, or citizenship records of the individual concerned. Its contribution lies in identifying the legal structure within which the election occurred and in explaining the constitutional significance of the structure through comparative analysis.

3. Commonwealth Citizenship and the UK Constitutional Framework

The Commonwealth of Nations is an association of independent states whose modern institutional basis is cooperation rather than imperial sovereignty. India has remained a member since 1949. In UK law, the category of Commonwealth citizen is relevant to a number of electoral and nationality rules, but Commonwealth citizenship is not itself a separate nationality.

The British Nationality Act 1981 provides the principal statutory framework for British nationality, while the Representation of the People Act 1983 supplies the central statutory framework for electoral registration and parliamentary elections. The historical category of qualifying Commonwealth citizenship has also been incorporated into the legal architecture governing eligibility for public office. It is therefore necessary to distinguish the status of being a Commonwealth citizen from the separate question whether a Commonwealth citizen satisfies the statutory conditions for a particular election.

For Scottish Parliament elections, the legal position has evolved. The Scottish Elections (Franchise and Representation) Act 2020 broadened the categories of foreign nationals able to qualify for Scottish parliamentary office where the statutory conditions were satisfied. The Scottish Elections (Representation and Reform) Act 2025 subsequently extended candidacy rights further by permitting foreign nationals with limited leave to remain to stand for Scottish Parliament and local government elections, subject to the remaining qualifications and disqualifications.

This development is constitutionally significant because it weakens the traditional equation between nationality and legislative eligibility. The Scottish framework permits political participation to be structured partly around lawful immigration status and residence rather than nationality

alone. *Prima facie*, this represents a form of constitutional inclusion distinct from the citizenship-centred model found in the Indian Constitution.

4. Q Manivannan's Election: Statutory Analysis

The Scottish Parliament's official election results record Q Manivannan among the MSPs elected for Edinburgh and Lothians East in the 2026 election. The parliamentary profile records service as an MSP from 7 May 2026. These official materials establish the fact of election and membership.

The relevant legal framework must not, however, be reduced to the proposition that an Indian citizen was eligible merely because India is a Commonwealth country. The post-2025 position is more nuanced. The Scottish Elections (Representation and Reform) Act 2025 was enacted specifically to extend candidacy rights to foreign nationals with any form of leave to remain. Its explanatory notes state that the reform was intended to permit foreign nationals with limited leave to remain to stand for Scottish Parliament and local government elections.

Accordingly, if the reported fact that Manivannan held Student route permission at the relevant time is correct, that immigration status does not, by itself, answer the candidacy question. The relevant statutory question is whether the person satisfied the nationality and immigration-status conditions created by the amended Scottish framework and was not otherwise disqualified. The article therefore rejects the earlier formulation that a Student visa 'usually counts as legal residence' as an adequate explanation. Legal presence, candidacy eligibility and the conditions attached to immigration permission are analytically distinct.

The distinction is reinforced by current Electoral Commission material. The Commission's candidate guidance describes the categories of eligible candidates and warns that eligibility and disqualification rules must be considered together. Because the statutory amendments and administrative guidance have evolved in close succession, the legally safer approach is to anchor the analysis in the enacted legislation and to use Commission guidance as administrative context rather than as a substitute for statutory interpretation.

The legal conclusion is therefore conditional rather than categorical: an Indian citizen holding limited leave to remain may fall within the post-2025 Scottish candidacy regime, but the validity of a particular candidacy depends on satisfaction of all statutory requirements at nomination and polling and on the absence of a disqualifying condition. The election itself, as officially recorded, demonstrates that the individual was returned and took the oath; it does not remove the need for doctrinal analysis of the statutory basis.

5. Immigration Status and the Electoral Office: Resolving the Legal Tension

The reviewer's concern regarding the interaction between a Student visa and legislative office requires a direct analysis of UK immigration law. The point is not adequately resolved by stating that a Student visa provides lawful residence. The more precise question is whether serving as an MSP constitutes employment prohibited or restricted by the Student route.

The current Immigration Rules provide an unusually clear answer. In the definitions section, 'employment' is defined broadly to include paid and unpaid employment, work placements, self-employment and professional activity, but the definition expressly states that standing for or filling an elected post in local or devolved government or legislatures is not considered employment for the purposes of the Immigration Rules. Consequently, employment conditions attached to Student permission do not, on that definition, prevent the holder from undertaking an elected MSP role.

This point materially changes the analysis. A Student route holder may remain subject to the ordinary conditions of the Student route concerning study and permitted employment, but the elected MSP office is not treated as employment for the specific purposes of those immigration-rule restrictions. The legal reconciliation therefore occurs through statutory and regulatory classification rather than through an assumption that the visa permits unrestricted work.

The distinction should nevertheless be maintained between eligibility to hold office and compliance with the continuing conditions of Student permission. The Student route remains a study-based immigration route,

and its conditions continue to apply to activities that fall within the regulatory concept of employment. The elected office itself is treated differently. The proper doctrinal conclusion is therefore that the existence of Student permission does not automatically create an immigration-law bar to holding an MSP seat, provided the person remains within the scope of the applicable immigration and electoral rules.

This analysis also demonstrates why the Scottish reform should not be described simply as an extension of Commonwealth privilege. The 2025 legislation operates through the legal status of foreign nationals with leave to remain, while the Immigration Rules separately determine how elected office interacts with immigration conditions. The resulting framework is an interaction between devolved electoral law and UK-wide immigration regulation rather than a single-source rule.

6. The Oath of Allegiance and Constitutional Allegiance

Section 84 of the Scotland Act 1998 requires a returned MSP to take the oath of allegiance, or an equivalent solemn affirmation, before participating in parliamentary proceedings. The statutory requirement is therefore a condition of membership and parliamentary participation, not a nationality rule.

The official report of the Scottish Parliament records that Q Manivannan made the prescribed solemn affirmation on 14 May 2026. The affirmation declared faithfulness and true allegiance to His Majesty King Charles, his heirs and successors, according to law. The legal significance of this act must be distinguished from the acquisition of British citizenship. Taking the oath does not, in itself, confer British nationality.

The constitutional question is nevertheless significant because the oath expresses an institutional form of allegiance while the member may remain a national of another state. In the UK constitutional order, allegiance and citizenship are not coextensive concepts. The Scottish statutory framework therefore permits a situation in which a non-British national may assume legislative office and undertake the parliamentary oath without first becoming a British citizen.

The Indian comparison exposes the divergence more clearly. Article 9 of the Constitution of India provides that a person who voluntarily acquires

the citizenship of a foreign State cannot remain a citizen of India by virtue of Articles 5, 6 or 8. The constitutional rule is supplemented by section 9 of the Citizenship Act 1955, which addresses termination of Indian citizenship upon voluntary acquisition of foreign citizenship. The legal trigger is therefore acquisition of foreign citizenship, not the mere undertaking of public service or residence abroad.

Accordingly, the taking of the UK oath of allegiance should not be equated with voluntary acquisition of British citizenship. Unless and until foreign citizenship is acquired, Article 9 does not operate merely because an Indian citizen has accepted an elected office or made an oath required by the law of another state. The constitutional issue is one of allegiance and office-holding, whereas Article 9 is framed in terms of citizenship acquisition.

This distinction is reinforced by the text of Article 102(1)(d), which disqualifies a person from membership of the Indian Parliament if the person is not an Indian citizen, has voluntarily acquired foreign citizenship, or is under an acknowledgment of allegiance or adherence to a foreign State. Although Article 102 directly governs membership of the Indian Parliament rather than membership of a foreign legislature, it demonstrates the constitutional sensitivity within Indian law to foreign allegiance in the context of legislative authority.

7. Indian Constitutional Position: Citizenship, Foreign Office and Legislative Eligibility

Part II of the Constitution of India, comprising Articles 5 to 11, establishes the constitutional foundations of citizenship. Article 9 is central to the present comparison because it distinguishes Indian citizenship from voluntary acquisition of foreign citizenship. Parliament is empowered by Article 11 to regulate acquisition and termination of citizenship by legislation, and the Citizenship Act 1955 supplies the principal statutory framework.

The Indian constitutional model also links legislative eligibility directly to citizenship. Article 84 requires a person seeking election to Parliament to be a citizen of India, while Article 173 establishes the corresponding citizenship requirement for membership of a State Legislature. These

provisions demonstrate a clear constitutional preference for citizenship as a condition of legislative authority.

The position should, however, be expressed with doctrinal precision. Article 9 does not state that every foreign public role terminates Indian citizenship. Its text concerns voluntary acquisition of the citizenship of a foreign State. Likewise, the oath taken by an MSP in Scotland does not itself amount to naturalisation as a British citizen. The legal consequence for an Indian national therefore depends upon whether foreign citizenship has actually been acquired, rather than upon the mere performance of public functions abroad.

The Overseas Citizenship of India scheme does not alter this basic distinction. OCI status is not equivalent to Indian citizenship and does not confer the full political rights of citizens. The Indian framework therefore remains citizenship-centred in legislative eligibility even while permitting substantial forms of overseas engagement by persons of Indian origin.

The comparison with Scotland is consequently not a comparison between two systems that simply 'allow' or 'prohibit' foreign nationals. It is a comparison between different constitutional allocations of significance. Scottish law separates nationality from eligibility more readily and now permits limited-leave foreign nationals to hold devolved office. Indian constitutional law places citizenship at the centre of eligibility for Indian legislative office and treats voluntary acquisition of foreign citizenship as constitutionally consequential.

8. Comparative Constitutional Analysis

The principal constitutional divergence lies in the legal relationship between citizenship and representation. The Scottish model permits a person who is not a British citizen to become an MSP if the statutory candidacy and disqualification rules are satisfied. The Indian model requires citizenship for membership of Parliament and State Legislatures. The difference reflects contrasting constitutional assumptions about who may exercise legislative authority.

First, the Scottish framework is structurally pluralist in its conception of political membership. Eligibility is not exhausted by British nationality. Commonwealth status, immigration permission and statutory exceptions

have historically performed a role, and the 2025 reforms moved further toward a residence-and-permission model. Secondly, the Indian framework is structurally citizenship-based. Articles 84 and 173 make citizenship an express qualification for legislative membership, while Article 9 and the Citizenship Act regulate the consequences of foreign citizenship.

Thirdly, the two systems distinguish allegiance from nationality in different ways. Scotland requires a parliamentary oath of allegiance as a condition of participation, but the oath does not confer nationality. India’s constitutional architecture treats foreign citizenship as a distinct legal status with consequences for Indian citizenship and, in Article 102, for eligibility for membership of the Indian Parliament.

The comparison therefore supports the concept of constitutional divergence. The Scottish system demonstrates that legislative legitimacy may be grounded partly in lawful residence and democratic participation, whereas the Indian system places greater emphasis on formal citizenship as the constitutional basis of legislative authority. Neither model can be reduced to a simple hierarchy of inclusion or exclusion; each reflects a different historical and constitutional settlement.

9. Comparative Framework

Issue	Scottish/UK framework	Indian framework
Primary legal basis	Scotland Act 1998; Scottish elections legislation; UK immigration rules	Constitution of India; Citizenship Act 1955
Legislative eligibility	Not limited to British citizens; statutory categories include qualifying foreign nationals under the Scottish framework	Citizenship is expressly required by Articles 84 and 173
Limited immigration permission	Scottish 2025 reforms extended candidacy rights to foreign nationals with limited leave, subject to statutory requirements	Residence without Indian citizenship does not qualify a foreign national for Indian legislative membership
Elected office and immigration conditions	Immigration Rules expressly exclude elected local/devolved/legislative office from 'employment' for immigration-rule purposes	No equivalent residence-based legislative qualification
Allegiance	Oath/affirmation required under Scotland Act 1998, s. 84	Foreign citizenship and foreign allegiance are treated within a citizenship-centred constitutional framework
Foreign citizenship	Does not automatically disqualify an MSP under the Scottish model considered here, subject to statutory disqualifications	Voluntary acquisition of foreign citizenship has constitutional and statutory consequences under Article 9 and Citizenship Act, s. 9

10. Constitutional Theory and Democratic Representation

10.1 Liberal Constitutionalism

A liberal constitutional approach places weight on equality, inclusion and the political participation of persons subject to the laws of the polity. From this perspective, lawful residence and civic contribution may provide a principled basis for political participation even where formal citizenship has not yet been acquired.

10.2 Classical National Constitutionalism

A classical national conception gives greater weight to citizenship, sovereignty and undivided political allegiance. Legislative office is understood as an exercise of sovereign authority, and formal citizenship may therefore be treated as the appropriate threshold for membership.

10.3 A Reconciliatory Approach

The Scottish framework illustrates an intermediate position. It does not abandon nationality as a legal category; rather, it permits statutory pathways through which lawful foreign residents may obtain political office. The oath of allegiance supplies an additional constitutional mechanism through which institutional commitment is expressed. The resulting model separates the legal concepts of nationality, residence, eligibility and allegiance instead of treating them as interchangeable.

11. Critical Evaluation

The strongest analytical lesson from the Manivannan case is that electoral eligibility, immigration permission and citizenship should not be collapsed into a single legal category. The original manuscript treated Commonwealth citizenship as the principal explanation. The statutory developments of 2020 and 2025 demonstrate that this is incomplete. The decisive question is whether the person falls within the current statutory eligibility framework and satisfies the applicable conditions.

The second lesson concerns the relationship between devolved constitutional development and reserved immigration law. Scotland can legislate on electoral candidacy within the devolved constitutional settlement, while immigration control remains a matter for the UK-wide constitutional order. The 2025 reforms therefore create a legal interface rather than a complete transfer of regulatory competence. The Home Office Immigration Rules determine the meaning and conditions of

immigration permission, while Scottish electoral legislation determines who may stand for and hold devolved office.

Thirdly, the case demonstrates that an oath of allegiance is not equivalent to naturalisation. The distinction is important for Indian constitutional analysis. Article 9 addresses voluntary acquisition of foreign citizenship, whereas the Scottish oath is a statutory condition of parliamentary membership. The two legal acts have different objects and different consequences.

Finally, the case illustrates the limits of comparative constitutionalism when historical context is ignored. The UK's uncoded constitutional order and the Commonwealth's historical legacy help explain why nationality and political eligibility have not always been identical. India's written Constitution, adopted after independence and partition, embeds citizenship within a more explicit constitutional structure. The divergence is therefore historical as well as doctrinal.

12. Implications for Constitutional and Electoral Law

The case has implications beyond the individual office-holder. It demonstrates that contemporary electoral law can decouple political representation from formal nationality while retaining immigration controls and constitutional allegiance requirements. This is particularly relevant in states with substantial migrant populations and devolved or federal systems in which electoral regulation may be distributed across different levels of government.

The Scottish experience also illustrates the importance of legislative sequencing. The 2025 reforms broadened candidacy rights, while the Home Office Immigration Rules separately classify elected office for immigration purposes. The interaction shows that electoral reform does not necessarily require parallel relaxation of immigration conditions; instead, the legal system may accommodate political office through a specific regulatory classification.

For comparative constitutional scholarship, the case provides a useful basis for studying how political membership is constructed. The Indian model treats citizenship as a constitutional threshold for legislative office, while the Scottish model allows lawful foreign residents within defined

statutory categories to enter the devolved legislature. The comparison thus supports a broader inquiry into whether democratic legitimacy is principally a function of nationality, residence, legal status, or some combination of these factors.

13. Conclusion

Q Manivannan's election to the Scottish Parliament is best understood not as a simple consequence of Commonwealth citizenship, but as the product of an evolving Scottish candidacy regime operating alongside UK-wide immigration law. The Scottish Elections (Representation and Reform) Act 2025 materially broadened candidacy rights by extending eligibility to foreign nationals with limited leave to remain, subject to the statutory qualifications and disqualifications. The legal analysis must therefore distinguish Commonwealth status, immigration permission and electoral eligibility.

The immigration question is also capable of a more precise resolution than the original manuscript provided. The current Immigration Rules expressly provide that standing for or filling an elected post in local or devolved government or legislatures is not employment for immigration-rule purposes. Accordingly, Student-route employment restrictions do not, merely by virtue of those restrictions, prevent a person from holding an MSP office. The continuing conditions of Student permission remain relevant to other activities, but the elected office is separately classified.

The Indian comparison reveals a different constitutional architecture. Article 9 concerns voluntary acquisition of foreign citizenship; Articles 84 and 173 require Indian citizenship for membership of Indian legislatures; and the Citizenship Act 1955 supplies the statutory framework for termination of citizenship. The Scottish oath of allegiance, required by section 84 of the Scotland Act 1998, does not itself constitute acquisition of British citizenship and therefore should not be treated as an automatic trigger under Article 9.

The principal conclusion is therefore one of constitutional divergence. Scotland permits a degree of legislative inclusion that is not wholly dependent upon formal British citizenship, while India maintains a citizenship-centred conception of legislative eligibility. The Manivannan

case demonstrates how devolved electoral reform, immigration regulation and constitutional allegiance can intersect without becoming legally identical. Its wider significance lies in showing how modern constitutional systems are recalibrating the relationship between residence, nationality, allegiance and democratic representation.

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