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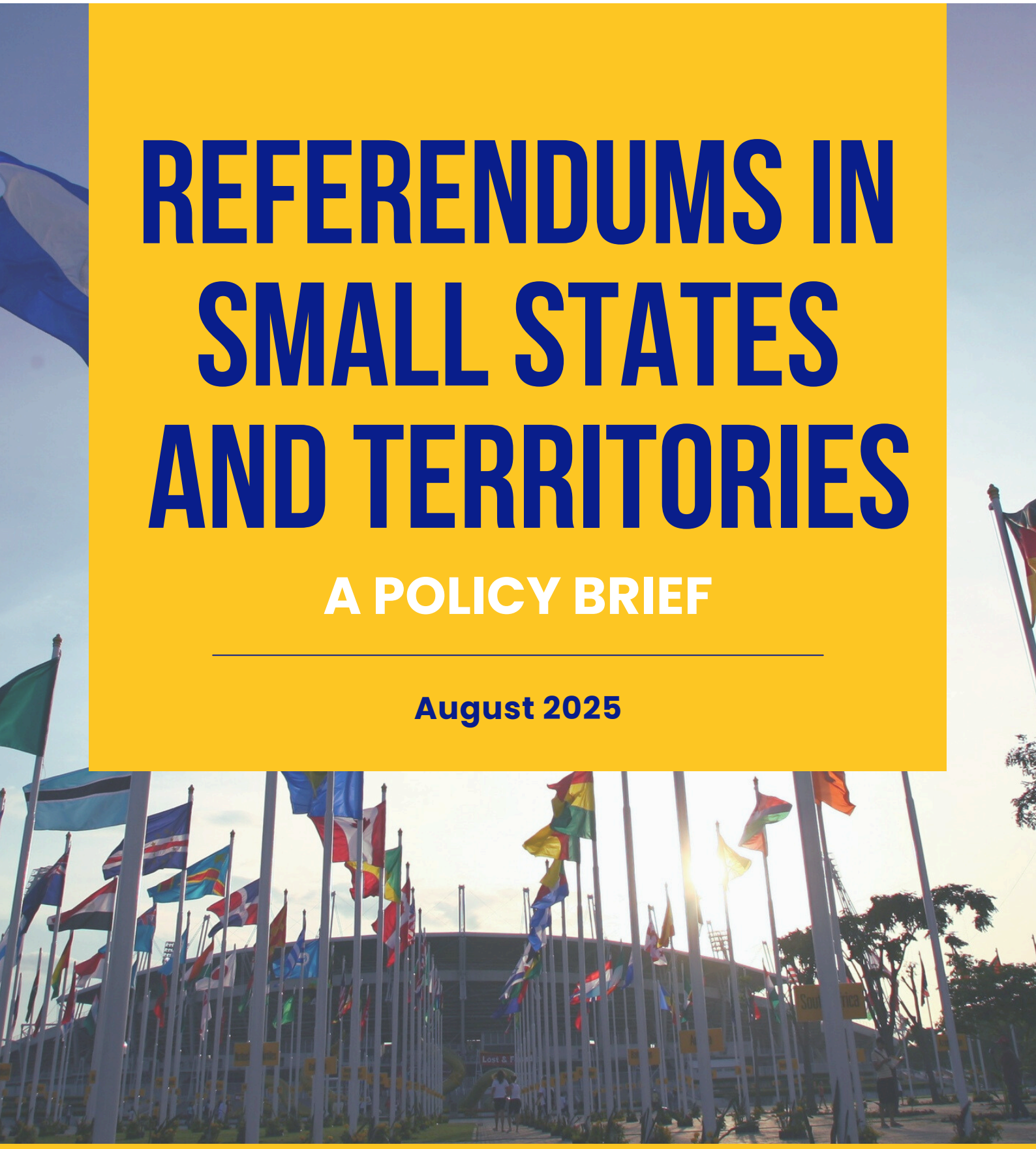
REFERENDUMS IN SMALL STATES AND TERRITORIES

A POLICY BRIEF

August 2025



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CONTENTS

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INTRODUCTION

1. A referendum can be considered the highest expression of direct democracy—its oldest and purest form. While most jurisdictions have transitioned from direct to mostly representative democracy, where citizens vote for political parties based on a broad platform of proposals, referendums allow voters to express their support or opposition to a single policy issue or set of issues. They can also serve as a political instrument for governments to raise difficult topics, with the outcome potentially shielding them from direct political fallout.

2. The term 'referendums' is used in this policy brief inclusively to encompass votes that might otherwise be classified as plebiscites or ballot measures, recognising the blurred boundaries between these categories in practice. This approach acknowledges that many such votes—whether binding or advisory, constitutional, or symbolic—serve similar democratic functions and often share overlapping political and social contexts.

3. A wide range of referendums are considered. These cases illustrate the diverse motivations, designs, and outcomes of referendums in small states and territories, and highlight their role in shaping debates around sovereignty, identity, and policy change.

4. Referendums have been increasingly used since the 1970s, a trend attributed to growing public dealignment and disenchantment with traditional political parties. This rise coincides with the breakdown of the 'frozen' / 'left-right' party systems and alliances in Western Europe and the emergence of new policy issues—such as nuclear power, abortion, and EU integration—that cut across traditional party lines.

5. While referendums are often seen as democratic tools, elites can also use them to consolidate power or deflect responsibility. In authoritarian contexts, they have been used to legitimise regimes. Even in democracies, referendums can be manipulated through biased wording, strategic timing, and/or campaign financing.

6. The effectiveness of referendums depends on design. This includes clear and unambiguous rules, thresholds, and procedures; deliberation, with opportunities for information campaigns, informed debate, and public education; and context, such as political culture, media environment, and institutional safeguards.

7. Beyond their legal and political functions, referendums often serve symbolic purposes. In transitional democracies or contested territories, they can help nurture nation building

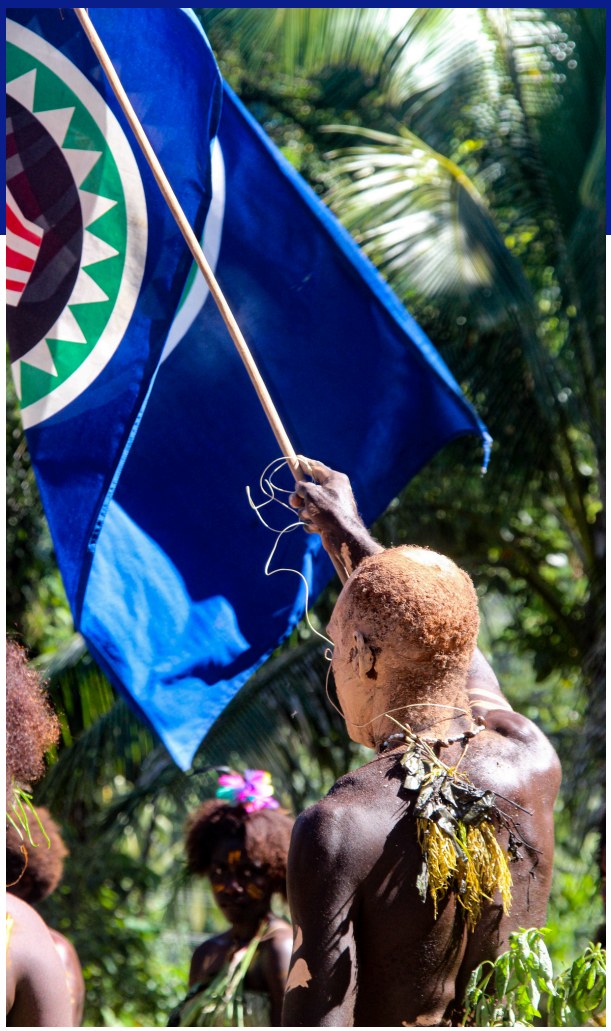
and government legitimacy. In Bougainville, the referendum on independence from Papua New Guinea (2019) was less about practical governance and more about affirming a collective identity. Referendums in Gibraltar (1967 & 2002) helped solidify its identity and legitimacy of its local government. In post-Soviet states, such as those in the Baltics, referendums legitimised new national boundaries and political orders.

8. This policy brief is inspired by the presentations and discussions from a two-day conference held at Queen Mary University of London (QMUL) in April 2025. It was convened to critically explore the evolving futures of small island states and territories, particularly those with lingering colonial ties, within the analytical frame of referendums.

9. Several important events and debates shaped the conference's thinking, including likely votes in Jamaica (on moving to a Republic) and New Caledonia (on a new political status with France), and the growing calls for greater autonomy in many British, Dutch, and French territories. By examining past referendums, the event aimed to inform and shape future debates and decisions on sovereignty, self-determination, and policy-making.

10. The event was coordinated by Professor Peter Clegg (University of the West of England, UK) and Professor Godfrey Baldacchino (University of Malta, Malta and *Small States and Territories* Executive Editor), supported at QMUL by Professor Caroline Morris (Centre for Small States). Thirty academics, policy makers and political commentators took part in the lively conversations, including a number on-line. A curated collection of papers from this conference will appear as a special section in *Small States & Territories*, a diamond open access academic journal, in May 2026.

FINDINGS



11. A referendum often offers a precious opportunity for lively, issue-based politics, especially in small states and territories. Indeed, referendums in such jurisdictions can represent useful examples of vibrant civic engagement and structured constitutional debate. All the more so when the initiative to hold a referendum is the result of grass roots civic mobilisation, as may be permitted by local legislation. One can expect a campaign of public information and engagement that mobilises and connects with most of the local population, including many of those who may be traditionally disinterested, disillusioned, or apathetic to domestic politics. This is a refreshing change; different from the rigid, top-down political messaging driven by political elites.

12. The Scottish independence referendum (2014) offered lessons in how to structure constitutional referendums to maximise legitimacy. (i) Clarity mattered: the process was transparent, the question was tested, and rules were agreed in advance. (ii) Civic ownership bred trust: voters believed the process was theirs, enabling emotional investment, even in disagreement. (iii) Narratives of hope mobilised engagement: the Yes campaign, whilst unsuccessful, created a sense of agency and collective vision. (iv) Deliberation over division: despite strong opinions, many participants described respectful debate and pride in participation.

13. Nevertheless, there is a temptation to simply 'shoot the messenger' and be done with it; rather than grapple with the message, as tends to happen in regular election campaigns. Of course, voters may still vote (or not vote) in a referendum in order to deliver a message of confidence, loyalty or opposition and disapproval to a government, a political party, and/or a political leader.

14. A referendum may be a tactical weapon in a government's arsenal: a chance for a citizenry and civil society to express their view, whilst the core business of government, and the associated exercise of power, goes on unhindered. Sitting political parties in

government may lose referendums but still go on to win the subsequent general election. This happened in both St Vincent and the Grenadines (2009) and Grenada (2016). Referendums on constitutional reform were voted down, but both governing parties retained power in the elections that followed.

15. Referendums, by definition, tend to operate somewhat outside the influence of the societally pervasive and intrusive ruling class in small states and territories. Once a referendum is announced, a sitting political party—or a governing administration in contexts without formal political parties—may lose some of the tight and comprehensive control it typically exercises over domestic governance. This dynamic was evident in the previously cited cases of St Vincent and the Grenadines, as well as Grenada. Furthermore, Bermuda's 1995 independence referendum became more focused on the future of the Premier than on independence itself. Independence was rejected and the Premier resigned.

16. Therefore, before a referendum is announced extant political parties—particularly those in government—need to assure as much as possible that their political capital is not diminished by the outcome of the referendum; and especially so when the outcome is not a foregone conclusion. In St Vincent and the Grenadines, some of the more radical initial proposals were removed from the final vote; while in Grenada, the government only endorsed three of the seven issues under consideration.

17. This political caution is understandable from a short-term party-political point of view; but it is quite damaging in getting a 'yes' vote in a referendum. If the governing party, which often institutes the referendum, is unenthusiastic, why would the general population vote in favour (or at all)?

18. A related issue is the degree to which there is enthusiasm for any change, often based on the question: will it make a positive difference to people's everyday lives? In the referendums held in Bermuda, Grenada and St Vincent and the Grenadines, there was a strong view that the suggested reforms would not make a real difference. These referendums may have served a purpose in airing some important issues; but, arguably, opportunities to advance change were lost.

19. How many questions should be posed in a referendum? It may be argued that a single question, clearly stated is preferable; otherwise, there is a risk of complexity and confusion. In Grenada, by bundling multiple complex and unrelated issues into a single (omnibus) referendum exercise, it was difficult for voters to express nuanced preferences. Similarly, the referendum in Guernsey (2018) was complex, leaving voters confused, which resulted in a new electoral system that few liked.

20. On the other hand, in the Cayman Islands, despite the inclusion of three questions on a single ballot (2025), the electorate engaged with each issue distinctly, and the relatively low rate of

rejected ballots suggested that voters were not confused or overwhelmed by the format. Thus, there are important decisions to make when deciding on how many questions to ask and if they should be voted on singularly or collectively.

21. The composition of Constitutional Reform Commissions (CRCs) is an important consideration as a prelude to any constitutional referendum. CRCs should be representative, with civil society groups selecting their own delegates to enhance legitimacy and reduce partisanship. Jamaica's 2023 CRC, chaired by a government minister, faced criticism for lacking diversity and independence. CRCs should not lead campaigns promoting their own proposals; instead, independent bodies should inform citizens and counter misinformation. Governments must also commit to timely responses to CRC recommendations and to hold referendums on accepted proposals. Clear timelines and bipartisan agreements can help maintain momentum and public trust.

22. If a government fails to honour the results of a referendum it had agreed to hold, its legitimacy may be compromised. Hence the importance of ironing out and spelling out—before a referendum is held—the mechanics of its consequences in sufficient detail. Consider Bougainville, Papua New Guinea (PNG), where 87.3% of registered voters voted in a 2019 referendum in which 98.3% chose independence. In July 2021, an agreement was reached between the governments of PNG and Bougainville under which Bougainville would gain independence by 2027 pending ratification by the PNG Parliament. At the time of writing, and already six years after the referendum, ratification remains pending.

23. Given the personalised nature of politics in small states and territories, referendum campaigns are shaped by intimate and targeted engagement. Strategic and deep targeting of voters via skilful use of both social and conventional media is to be expected, given the low threshold of intimacy and privacy in such small jurisdictions. Local Churches, social media influencers, and prominent local personalities, such as athletes, singers and other artists, may be roped in to galvanise support for a particular referendum option, or just to encourage voter turnout.

24. Religious opposition played a key role in the 2016 referendum's (negative) outcome in Grenada. The Rights and Freedoms Bill, which sought to enshrine gender equality and expand civil liberties, became the focal point of controversy. Evangelical churches and other religious groups interpreted the bill's gender equality clause as a covert attempt to legalise same-sex marriage. They launched a robust campaign, urging their parishioners to vote 'no.' In religious societies the influence of church leaders is significant.

25. In small states and territories, the depth and reach of political mobilisation in referendums can be exceptional. Extremely high turnouts are possible, thus also boosting the legitimacy of the result: for example,

84.6% of registered voters participated in the 2014 Scottish Independence referendum; 87% in the 1991 Kosovo Independence referendum; 87.9% in the 2002 Gibraltar sovereignty referendum; 91% in the 2003 Malta's EU Accession referendum; and 92% in the 2013 Falkland Islands sovereignty referendum.

26. Voter turnout can be bolstered by holding a referendum at the same time as a general election, although it is not always enough to pass the measure(s) in question. The Cayman Islands saw a 74% turnout in the 2025 referendum, demonstrating how a concurrent general election can boost participation. In 1986, Palau held a referendum on the Compact of Free Association with the US alongside national elections, with a high turnout of 82%. Although 66% voted in favour, the result fell short of the required 75% threshold. On Prince Edward Island, Canada's smallest province, a referendum on electoral reform ('First Past The Post' versus 'Mixed Member Proportional' system) was held concurrently with the 2019 provincial elections. Voter turnout was 76.3%. However, neither side reached the threshold of a majority in 60% of contested seats for the vote to be binding.

27. Arguably referendums are likely to be most successful if there is strong political involvement and the issue under consideration is felt to be important by the electorate, and/or a referendum is held at the same time as a general election. But, as noted previously, if some or all of these elements are missing, as in the case of Bermuda, Grenada, and St Vincent and the Grenadines, then turnouts are relatively low. In the 2016 Grenada referendum, turnout was just 32.5%.

28. The electoral register is a highly debated aspect of referendums, where momentous results, and the difference between victory and defeat, may depend on very few votes. Rules must clearly establish the voting constituency, and a suitably updated voting register 'fit for purpose' is required. Note that many small jurisdictions have large diasporas elsewhere, whilst there may be many foreigners with jobs and/or second homes in these small jurisdictions. Should either of these important groups have the right to vote, and, if so, how would they be registered?

29. 'The ethnic question' is often critical: consider how some 20% of French citizens residing in New Caledonia—some 40,000 persons—cannot vote in local elections, and many 'non-belongers' who have been living in various Caribbean states and territories for many years have simply no path to citizenship (and voting rights) and so are disenfranchised. This was true in the 2025 Cayman Islands referendum. Defining who is entitled to vote has also been a lasting challenge in Greenland because of its ambiguous status within the Kingdom of Denmark.

30. Referendums are not isolated events: their timing and sequencing shape political trajectories. Greenland's experience shows how one referendum can trigger another or foreclose future

involvement: the 1972 European Economic Community (EEC) referendum (Denmark as a whole voted 'yes', ignoring Greenland's dissent), catalysed the 1979 Home Rule vote, which in turn enabled the 1982 EEC exit referendum. However, Greenland's withdrawal led to its exclusion from future Danish EU referendums, despite their impact on Greenlandic affairs. To avoid such pitfalls, referendums must be carefully timed and sequenced.

31. Referendums have significant risks when the likely outcome of a vote is close to a 50-50% result. Such narrow, cliff-hanging margins of victory (and defeat) can render referendums emotionally divisive and nationally damaging. The losing camp may not accept the result gracefully: they may feel cheated by such a slim margin of defeat and may wish to push for a re-run.

32. It is worth reflecting whether referendums involving momentous decisions—think of those that affect a country's constitutional future such as a region or overseas territory's potential independence; or the future of a country's membership in a larger regional bloc—should not be allowed to pass with simple majorities. A threshold of voters and/or of valid votes is sometimes added to avoid these difficult outcomes. But such thresholds can themselves be contentious, especially if applied arbitrarily by governments after the results are announced. (See Palau and Prince Edward Islands referred to above.)

33. Without such considerations, the results of referendums can be extremely messy, and it takes great efforts by all to 'heal' the divisions. Some creative governance initiatives may be required to build bridges across conflicting factions and bolster nation building. Consider the 2016 'Brexit' vote; the 1980 and 1995 sovereignty referendums in Quebec, Canada; the 'unconstitutional' referendum for the independence of Catalonia in 2017; and the three independence referendums in New Caledonia. The multiple referendums in Puerto Rico on a future status have failed to give a clear direction on next steps and have been undermined by political interference, such as not including protest votes in the official count, which inflated the apparent support for statehood (i.e., becoming a state of the US). As a result, serious divisions exist about the status issue itself and the utility and probity of referendums.

34. Anyone organising a referendum does well to consider the likelihood and implications of a boycott: what happens if a party or organisation advises its membership to boycott the referendum, or to spoil its ballots? How does that compromise the legitimacy of the whole exercise and its results? In Bermuda, even though the opposition Progressive Labour Party (PLP) supported independence, it decided to boycott the 1995 referendum. This was a pragmatic decision to put pressure on a divided United Bermuda Party government; the PLP won the following general election.

35. Referendums on the political status of small (often island) territories are often couched (by at least one of the parties/groups in the campaign) in the language and rhetoric of colonialism. In such cases, a vote for greater autonomy, including independence, is often framed as an exercise in self-determination, autonomy, basic human dignity, and a nativist sense of 'settler Indigeneity.' This envisages the (smaller, island) party as the victim of oppression and exploitation by another (larger, mainland or larger island) party. Indeed a 'second island' effect can come into play: the citizens of small island territories abhor becoming 'the colonies' of other slightly larger (but still small) island territories: Aruba secured its own country status within the Kingdom of the Netherlands in 1985 to avoid being a 'colony' of Curaçao; Nevis tried to secede from St Kitts; the Ellice Islands successfully seceded from the Gilbert Islands as independent Tuvalu; and Anguilla reverted to being a British Overseas Territory rather than form part of the tri-island sovereign state led by St Kitts.

36. Since 1984 however, the appeal of (and appetite for) sovereignty is much diminished. Other than the breakup of empires and unwieldy countries, few territories have sought and obtained independence: Namibia, South Sudan, and Timor-Leste. Indeed, the authorities of many small territories have rejected options for independence via referendum, pragmatically opting instead to enhance their strategic autonomy, with direct links to the metropole, and to craft 'shared rule' arrangements with larger powers as subnational jurisdictions. Examples include: Bermuda, Niue (twice), Puerto Rico (various instances), and Tokelau (twice).

37. There have only been two successful pro-independence referendums since 2012: South Sudan and Bougainville. The former's post-independence history has been far from a story of success; and the latter's status remains in limbo. So, there are inherent risks in independence and that is why many other territories have either voted 'no' or shied away from this type of referendum entirely.

38. There are also examples of inverse referendums, which are organised to reaffirm the present status of a territory. The Falkland Islands and Gibraltar have used such referendums to re-enforce their commitment to the UK. The results were not in doubt, but they were important in making clear to Argentina and Spain, and indeed to the UK, that citizens in these small territories had a voice. The 2002 referendum in Gibraltar was held against the backdrop of joint sovereignty negotiations between Spain and the UK, with Gibraltar excluded. The plan was then for Gibraltar to hold a referendum on the proposal, but Gibraltar's own referendum pre-empted this, strengthened the voice of Gibraltar and led to a new constitution negotiated solely with the UK.

CONCLUSION

39. Referendums remain powerful yet paradoxical instruments of democratic expression—capable of both empowering citizens and entrenching elite agendas. In small states and territories, they offer a rare opportunity for direct civic engagement, often mobilising communities in ways that transcend routine political participation. However, their success hinges on careful design, transparent processes, and genuine political will. As the experiences of jurisdictions such as Bermuda, Bougainville, Grenada, New Caledonia, and Puerto Rico show, referendums can falter when poorly structured, inadequately supported, or manipulated for partisan gain.

40. The lessons drawn from recent and historical referendums underscore the importance of clarity in question framing, inclusivity in voter eligibility, and the need for robust public education. Moreover, the symbolic and strategic dimensions of referendums—particularly in post-colonial and semi-autonomous contexts—highlight their role not just in shaping policy, but in articulating identity, legitimacy, and aspirations for self-determination.

41. Ultimately, referendums should not be treated as isolated events but as part of a broader democratic continuum. When thoughtfully implemented, they can serve as catalysts for meaningful constitutional reform and nation-building. When mishandled, they risk deepening divisions and undermining trust in democratic institutions. As small states and territories navigate complex futures, the referendum remains a vital, if imperfect, tool: it demands both caution and courage in its application.

42. To maximise their democratic potential, referendums must be embedded in inclusive, deliberative processes that reflect the diversity of voices within a polity. This includes ensuring that marginalised groups are heard, that misinformation is countered, and that the outcomes—whatever they may be—are respected and implemented in good faith. Only then can referendums truly fulfil their promise as instruments of democratic renewal.

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