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[Research Note]

A Preliminary Study to Reconsider ‘Britishness’ in 21st-Century Britain: in Search for a Theoretical Framework¹⁾

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Abstract

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Tracing the Political Projects of Belonging and Citizenship Legislation in Britain

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Abstract

This study attempts to present a theoretical framework for the research project whose purpose is to clarify the dynamic interplay between immigration/nationality and external policies in post-imperial and pre-Brexit Britain. On the basis of the theoretical framework, the author later aims to write a full research paper.

Although the fields examined here—immigration/nationality and external policies—seem unrelated, they are in reality strongly entwined, shaping and reshaping each other in response to policy changes. The two questions addressed in this paper are as follows. Why do the heated debates on ‘Britishness’ and government actions to base immigration/nationality legislation on it continue? Given that the meaning of the ‘Britishness’ of the time was shaped, how did it accrue through the process of ongoing manoeuvring (in this paper, this process is termed the political project of belonging) each time? The precise meaning of ‘Britishness’ is difficult to discern, and even if it can be defined, a more difficult task may be creating a single definition everyone agrees on. Debates on the meaning of ‘Britishness’ and the political project of linking immigration/nationality legislation with it continue among the government, academia, and the media, who are competing for a tangible impact within the project.

The research project itself will focus on the years 1981 and 2002, which marked watershed moments for British policy regarding immigration and nationality. The British Nationality Act (BNA 1981) established ‘British citizenship’ into the statute book, thus representing the thorough overhaul of British immigration/citizenship policies needed since the Second World War. Nearly twenty years later in 2002, two pieces of legislation,

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1) This research note is based on the presentation prepared for IPSA 2018 (Brisbane, Australia).

namely the Nationality, Immigration and Asylum Act (NIAA 2002) and British Overseas Territories Act (BOTA 2002) again brought about substantial changes to the immigration/nationality legislation. NIAA 2002 claimed to introduce new meaning and value to the acquisition of British citizenship by introducing a citizenship test and citizenship pledge, while BOTA 2002 expanded the geographic scope of British citizenship by renaming the existing dependent territories ‘overseas territories’ and providing British citizenship, in theory, to all citizens thereof. Despite successive immigration/nationality policy reforms to reframe their system around the concept of ‘Britishness’, government efforts failed, and as a result, amendments of immigration/nationality legislation followed. Now that Britain will be leaving the European Union (EU) at the end of March 2019, another round of searching for ‘Britishness’ and the political project of belonging that claims to link its results to nationality legislation will begin.

Introduction

A German newspaper commentator described the British Empire and Commonwealth in 1938 as follows. ‘[They give] an impression of unsystematic genius in the Englishman, who has no sense of structural beauty or orderly creation. To him nothing is wrong, however illogical, so long as the machine works’²⁾. Although politicians, journalists, and academics have all emphatically engaged in debates on the meaning of ‘Britishness’, they have not yet reached agreement. We tend to think that nationhood, ‘Britishness’ in this case, develops over a long period and that the members of each country are defined by the nationality legislation as the embodiment thereof. However, we cannot explain Britain’s case if we understand nationhood in this way. Immigration/nationality policies in Britain have never been associated with ‘Britishness’, regardless of how it is defined, but have been flexible and malleable to serve the needs of the then government³⁾.

The British Nationality Act (BNA) 1981 established ‘British citizenship’ in the statute book. A Green Paper in 1971 urged a review of Britain’s immigration/nationality policies and led to the enactment of BNA 1981. It argued that ‘Britain [was] no longer an Imperial power’ and that ‘the all-embracing concept of nationality with this role’ had to be replaced by ‘a more meaningful citizenship for those who had close links with the United

2) *Berliner Tageblatt*, 20 August 1938, cited in Nicholas Mansergh *Survey of British Commonwealth Affairs: Problems of Wartime Co-operation and Post-War Change 1939–1952*, Oxford University Press, 1958, p. 367.

3) In every country nowadays, citizenship, in combination with immigration laws, constitutes the official expression of who is a legitimate member of the political unit and on what terms, and thus offers valuable insight into the thinking of the policy-makers of the time about the political unit and organisation of its population. In Britain, immigration and nationality legislation has become complicatedly entangled because of its imperial past. Therefore, this paper examines immigration and nationality legislation in combination (i.e., termed immigration/nationality), rather than treating them separately.

Kingdom'⁴⁾. However, even in 2018, six citizenship statuses exist, namely British citizenship, British Overseas Territories Citizenship (BOTC), British Overseas Citizenship (BOC), British subject (BS), British National (Overseas) (BN(O)), and British Protected Person (BPP)⁵⁾. After the enactment of BNA 1981, the Nationality, Immigration and Asylum Act (NIAA 2002) made the citizenship test and citizenship ceremony compulsory for those who gain 'British citizenship' through naturalisation. However, this did not quell the argument for 'Britishness', and the citizenship test *Life in the UK* increased the controversy around the meaning thereof.

The research projects whose theoretical framework which this study presents intends to address the following two questions. Why do the heated debates on 'Britishness' and government efforts to enact immigration/nationality legislation based on this concept continue? If it takes so long for successive governments to determine what 'Britishness' means, we begin to wonder if nationhood in Britain ever even existed. Does it make sense instead to regard 'Britishness' as something not firm and concrete, but shaped and reshaped continuously? If it is ever in the making, what role did the nationality and immigration legislation in Britain ultimately play and what led to its occasional amendments? In sum, the second question asks what shaped the meaning of the 'Britishness' of the time and how did it accrue through the process of ongoing manoeuvring (in this paper, this process is termed the political project of belonging) each time.

The precise meaning of 'Britishness' is difficult to discern, and even if it can be defined, a more difficult task may be creating a single definition everyone agrees on. Debates on the meaning of 'Britishness' and the political project of linking immigration/nationality legislation with it continue among the government, academia, and media, who are all competing for a tangible impact within the project. This project is complicated in Britain, as it has always been part (or at the centre) of a 'global institution', be it the Empire, Commonwealth, or EU. Britain as a member of such an institution needs to divide those who hold 'Britishness' and those who do not, and differentiate among the holders in accordance with their proximity to the definition. Britain's nationality/immigration legislation, the institutionalised form of 'Britishness', is thus not unrelated, but continually entwined with its external policy.

To clarify the dynamic interplay between immigration/nationality and external policies in post-imperial and pre-Brexit Britain, the paper focuses on the years 1981 and 2002, which marked watershed moments for British policy regarding immigration and nationality. The enactment of BNA 1981 finally established 'British citizenship' into the

4) *British Nationality Law: Discussion of Possible Changes*, Cmnd. 6795, HMSO, April 1977, pp. 4 & 10.

Following the recommendations made in the 1977 green paper, the Conservative government in 1981 prepared the British Nationality Bill 1981, which later became the British Nationality Act 1981 (BNA 1981).

5) See Gov. UK, 'Types of British Nationality', accessed 26 May 2018, <https://www.gov.uk/types-of-british-nationality/print>.

statute book, thus representing the thorough overhaul of British immigration/citizenship policies needed since the Second World War. Nearly twenty years later in 2002, two pieces of legislation, namely NIAA 2002 and British Overseas Territories Act (BOTA 2002), again brought about substantial changes to immigration/nationality legislation. NIAA 2002 claimed to introduce new meaning and value to the acquisition of British citizenship by introducing a citizenship test and citizenship pledge, while BOTA 2002 expanded the geographic scope of British citizenship by renaming the existing dependent territories ‘overseas territories’ and providing British citizenship, in theory, to all citizens thereof. Despite successive immigration/nationality policy reforms to reframe the system around the concept of ‘Britishness’, government efforts have failed, and consequently, amendments of immigration/nationality legislation followed. Now that Britain will be leaving the EU at the end of March 2019, another round of searching for ‘Britishness’ and the political project of belonging that claims to link its results to nationality legislation will begin.

To answer the central questions—the continued search for the meaning of ‘Britishness’ and workings of the political project of belonging that determined the meaning of the ‘Britishness’ of the time to provide the basis for each immigration/nationality legislation—this paper extends the scope of analysis to Britain’s external policies rather than concentrating only on domestic debates. The author of this paper analysed in a previous work changes in the role and meaning of citizenship in Britain in the context of building and maintaining the British Empire and Commonwealth⁶. This paper begins where the previous work ended, adding to its analysis the interaction between immigration/nationality and external policies.

The research project aims to advance the following arguments. First, Britain’s case represents one way of thinking about nationhood, in this case as ‘Britishness’, as being crystallised at a crucial event. Previous works in the field often treated nationhood as developing over a long period and nationality legislation as the embodiment thereof. However, this way of understanding nationhood does not fully explain the frequent amendments of nationality legislation in Britain. Instead, a particular event of the time triggered the interplay between immigration/nationality and external policy, resulting in a new interpretation of ‘Britishness’, and consequently, the enactment of nationality legislation as its institutional form.

Second, in attempting to define nationhood, inputs of external policies play an indispensable role in Britain, because of its membership in a ‘global institution’. Furthermore, this paper highlights that external policies are likely entwined with those stemming from Britain’s imperial legacies. In a sense, Britain was late to adjust its immigration/nationality legislation to one based on nationhood. The understanding of

6) Karatani, Rieko. *Defining British Citizenship: Empire, Commonwealth and the Modern Britain*, Routledge, 2003.

'Britishness' not only drew a line between those included and excluded as holders, but also differentiated among those included in accordance with their proximity to the definition of the 'Britishness' of the time. This inner division among holders of 'Britishness' makes the political project of defining it complicated and controversial, reflecting the ongoing manoeuvring by those engaged in the debate. Thus, the interpretation of 'Britishness' through the political project of belonging of the time has been reflected in and influenced by the events of the time that emerged through the interplay between immigration/nationality and external policies. Furthermore, external policies remain entangled in the legacy of the British imperial past.

In providing a brief survey of the concept of nationhood and how the understanding thereof is related to immigration/nationality legislation in general, the author later aims to write a full research paper on the basis of the theoretical framework which this study presents. In it, she will focus on BNA 1981 and the third on NIA 2002 and BOA 2002. In these sections, the interpretation of the events that led to the enactment of nationality legislation in the pursuit of 'Britishness' and its embodiment is discussed. In conclusion, by outlining the argument of this paper, reflections are offered in the context of the contemporary debate on British citizenship on the eve of Brexit.

Tracing the Political Projects of Belonging and Citizenship Legislation in Britain

The modern institution of citizenship describes one's legal status as a formal member of a state and should imply one's national membership, regardless of how a 'nation' is defined⁷⁾. According to Roger Brubaker, this type of citizenship presupposes that 'the state claims to be the state of, and for, a particular, bounded citizenry' and asserts its legitimacy based on the will of that citizenry, who are grouped by a shared identity and loyalty to the state⁸⁾. Especially after the Second World War, this way of understanding citizenship, referred to as national citizenship in this paper, became the prevalent international mode.

However, unlike other western democratic countries, Britain has never completely—even today—established a national citizenship, namely citizenship based on nationhood with rights and obligations granted only to its holders (see, Table 1). The conception of the nation-state in Europe was closely linked with the historical process of enclosing citizenship within the territorial-based national unit⁹⁾. However, Britain has always been part of the 'global institution'¹⁰⁾, be it the British Empire, British Commonwealth, or just the Commonwealth, and therefore, its formal membership was never confined to that of

7) Brubaker, Rogers, *Citizenship and Nationhood in France and Germany*, Harvard University Press, 1994, p. 21.

8) *Ibid.*, p. x.

9) See Bendix, Reinhard, *Nation-Building and Citizenship: Studies of Our Changing Social Order*, University of California Press, 1977. First published in 1964.

10) Judd, Denis, *Empire: The British Imperial Experience from 1765 to the Present*, Harper Collins, 1996, p. 8.

Table 1. Status of citizenship in British history

	-1914	1914-1948	1948-1981	1981-
CITIZENSHIP STATUS	British subject	British subject	Commonwealth Citizen (CUKC, Citizen of the Commonwealth Countries, BSWC)*	British Citizen
FORMS OF MEMBERSHIP DETERMINATION (POLITICAL PROJECT OF BELONGING)	Nationality legislation in Britain applicable to all across the Empire/British commonwealth	<u>Britain & Dominions**</u> : Nationality legislation through mutual consultation <u>The rest of the Empire</u> : Nationality legislation applied	Nationality legislation in Britain & Commonwealth citizenship status given to citizens of all member states in accordance with their own citizenship legislation	Nationality legislation in Britain
BASIS OF MEMBERSHIP	Allegiance to the Crown	Allegiance & BN&SAA 1914***	BNA 1948****	BNA 1981*****

* Under the British Nationality Act 1948, **CUKC** – Citizen of UK and Colonies; **BSWC** – British subject without citizenship

** Dominions include Canada, Australia, New Zealand, South Africa, Newfoundland, and Eire.

*** BN&SAA 1914 – British Nationality and Status of Aliens Act 1914

**** BNA 1948 – British Nationality Act 1948

***** BNA 1981 – British Nationality Act 1981

Britain. The dominant view in the field concludes that Britain’s formal membership—citizenship status defined by immigration/nationality legislation—and its sense of nationhood (Britishness) are two separate issues, and thus does not pay enough attention to the reciprocal link between them. Existing work on citizenship in Britain often claims that the institutional definitions of formal membership represent neither whom ‘belongs’ nor what it means to ‘belong’ to Britain¹¹⁾. For example, based on the atypical usages of

11) Compared to France, Favell noted that ‘[b]eing British “culturally”, being a British national (with a right of abode), and being a British citizen (a subject of the sovereign) are distinct from “citizenship”’. Favell, Adrian, *Philosophies of Integration: Immigration and the Idea of Citizenship in France and Britain*, Macmillan, 1998, p. 113.

Table 2. Political projects of belonging in post-imperial pre-Brexit Britain

	1981	2002	2019
EVENTS (DOMESTIC, IMPERIAL, EXTERNAL)	Race riots; independence of dependent territories in Africa; accession to EC	Asylum crisis, race riots, terrorism; HK; Amsterdam treaty	Brexit Windrush scandal
OUTCOME AND TARGET	BNA 1981 - Era of national citizenship	NIAA 2002*, BOA 2002** - Era of neo-liberal citizenship	?
AFTERMATH	Work permits, carriers' liability	Counter-terrorism measures, earned citizenship, point-based system, discharged Gurkhas	?

* Nationality, Immigration and Asylum Act 2002

** British Overseas Territories Act 2002

citizenship on British legislation, one authoritative work in the field stated that there is no such thing as British citizenship, not at least as citizenship is understood in other countries¹²⁾.

In the paper, the author wishes to argue that successive governments in Britain have never abandoned the political project of belonging—determining how nationhood is understood and interpreted in immigration/nationality legislation—and that the project had different aims at different times (see, Table 2). Discussing the question of belonging, Yuval-Davis contends that it is crucial to differentiate between belonging and the politics of belonging¹³⁾. According to her, belonging is ‘about emotional ... attachment, about feeling “at home”’, whereas the politics of belonging implies ‘specific political projects aimed at constructing belonging to particular collectivity/ies which are themselves being constructed in these projects in very specific ways and in very specific boundaries’¹⁴⁾. As such, the political project of belonging constructs the boundary of the time that divides

12) Dummett, Ann, ‘The Acquisition of British Citizenship. From Imperial Traditions to National Definitions’ in Rainer Baubock (ed.), *From Aliens to Citizens: Redefining the Status of Immigrants in Europe*, Avebury, 1994, p. 75.

13) Yuval-Davis, Nira, *The Politics of Belonging: Intersectional Contestations*, Sage, 2011.

14) *Ibid*, p. 10 and pp. 21–26. This work borrowed the idea from Yuval-Davis’ argument regarding the political project of belonging. She discusses three political projects of belonging: that of Enoch Powell, Norman Tebbit, and of the New Labour in her work. This paper concentrates exclusively on projects that led to the enactment of immigration/nationality legislation.

populations into those who are formal members of the state and those who are not. In the case of 'Britishness' and the immigration/nationality legislation as the embodiment thereof, the purpose of the political project of belonging differed at times through the mutual interaction of actors involved in the project. Historically, the institutional definition of citizenship in Britain has been intentionally separated from what it means to 'belong' to Britain as late as until the enactment of BNA 1981. Nonetheless, BNA 1981 officially changed the purpose of the project and since then has aimed to merge those who hold the status of citizenship and those who share the meaning of 'Britishness', regardless of definition.

Here, the question of why the debate on 'Britishness' continues in an endless process of construction and reconstruction of its interpretation emerges. Considering Britain's history, it is not surprising that the meaning of 'Britishness' is never concrete. Britain as the political entity started as the United Kingdom after the political union of England, Wales, and Scotland, and then expanded globally to form the Empire including people worldwide as British subjects. One recent work argues that Britain's history makes 'Britishness impossible to pin down to any single way of looking...' ¹⁵⁾. However, he continues that 'to locate Britishness is not to find nothing', but to find its understanding 'to include everyone who is British' ¹⁶⁾. In the paper, the author attempts to argue that a problem emerges when those interested in the debates on 'Britishness' start to think that a single concrete definition thereof should eventually be found.

Academic interest in nationhood and nation has not subsided. Reviewing previous literature in the field, Brubaker highlighted two schools on nationhood: One considers it as 'something that develops', and the other as 'something that happens' ¹⁷⁾. He argues that by questioning what a nation is, we have already accepted that a nation exists. He suggests that we should rather consider 'nationhood as a political and cultural form institutionalised within and among states' ¹⁸⁾. It is intriguing that Brubaker also emphasises in his work *Citizenship and Nationhood in France and Germany* that distinct traditions of nationhood in each country have a lasting impact on its immigration/nationality legislation and that this is the reason French and German legislation differs ¹⁹⁾. Thus, he neither argues that we must decide on whether 'developmentalist' (his term) or 'eventful perspectives' on nationhood are correct, nor does he insist that we should maintain only one of these and discard the other as unnecessary and incorrect.

He advocates studying the 'eventful perspectives' of nationhood, because it is not as advanced as 'developmentalist' approaches. Without 'eventful perspectives', we cannot

15) Brooks, Thom, *Becoming British: UK Citizenship Examined*, Biteback Publishing, 2016, p. 254.

16) *Ibid.*, p. 254 & p. 76.

17) Brubaker, Rogers, *Nationalism Reframed: Nationhood and the National Question in the New Europe*, Cambridge University Press, 1996, p. 19.

18) *Ibid.*, p. 16.

19) Brubaker, Rogers, *Citizenship and Nationhood in France and Germany*, Harvard University Press, 1992.

explain cases wherein one understanding of 'nationhood' is overtaken by the other and immigration/nationality legislation enacted on this basis. The examples Brubaker used referred to the groups of people who after the collapse of the Soviet Union and Yugoslavia, transformed their nationhood and formed a new state. We should pay theoretical attention to both aspects of nationhood: The one that develops over a long time and is stable, and the other that is crystallised in a very short period through a particular event and is thus fragile and transformative. Often, nationhood emerges at a contingent event as 'top down' conceptualisation, affording legitimacy and trust to those who run the state²⁰.

In the case of 20th-century Britain, the purpose of the political project of belonging differed before and after the enactment of BNA 1981. In previous work, the author examined Britain's political projects when the country needed to manage the 'global institution' and its formal membership was granted to ethno-linguistically diverse groups worldwide. At the time, as a consequence of managing the 'global institution', the definition of 'Britishness' could not serve as the basis of its formal membership (who belongs to Britain), but had to remain unspecified. The institutional definition of formal membership could thus be altered in accordance with the constitutional arrangement between the component political units of the global institution. The 'fuzzy', 'vague', and 'malleable' nature of 'Britishness' in existing works resulted from the way in which successive British governments extended the status of Britain's formal membership to accept a new group of people in the process of forming the *United Kingdom* and later, the Empire.

The two political projects of belonging in 1981 and 2002, the focus of the paper whose theoretical framework this study presents, had to deal with opposite trends to those tackled in previous projects. The then government had to respond to the contraction rather than expansion of the global institution. Given that Britain's formal membership had to include ethno-linguistically diverse peoples in the British Empire, 'Britishness' had to be detached from the institutions of citizenship. The framework of Commonwealth citizenship was maintained after the Second World War, when national citizenship became prevalent. Thus, 'Britishness' gradually took shape in the 1960s and 1970s through immigration control, the purpose of which was to denote who 'belonged' to Britain. Unlike other developed countries, the dichotomy between citizens and non-citizens created by immigration and nationality law was slow to develop in Britain. In 1981 and 2002, the paper intends to demonstrate that the then government was urged to deal with particular events of the time and conceptualise the understanding of 'Britishness' to include certain groups of peoples. In 1981, race relations and the upsurge of the far-right party—the National Front—were the events that advanced the enactment of BNA 1981, which was

20) Uberoi, Varun, and Iain McLean, 'Britishness: A role for the State?', in Andrew Gamble and Tony Wright eds., *Britishness: Perspectives on the British Question*, Wiley-Blackwell, 2009, p. 43.

based on the Immigration Act 1971 (IA 1971). In 2002, the events of counter-terrorism, EU relations, and the citizenship status of residents in the remaining overseas territories required the Blair government to promote the political project of belonging. Each administration during the periods under study succeeded in achieving the purpose of the project in constructing the 'Britishness' that suited its purpose. However, other events occurred, making it necessary to redefine 'Britishness' in response to different contexts.

Tentative Findings

On the basis of the theoretical framework in this paper, the author plans to examine the two case studies regarding pieces of legislation enacted in 1981 and 2002. This note is written in order to prepare for the later project, in which the author wishes to demonstrate the following three considerations.

First, Britain was a latecomer to the institution of national citizenship, repeatedly postponing the creation of citizenship until 1981. Therefore, 'Britishness' never exclusively referred to people born and living in Britain. The political projects of belonging, as termed by Yuval-Davis, had to cover all those living within the 'global institution', first in the British Empire and then the Commonwealth, and had to search for suitable ways to ensure inclusiveness. While policy-makers in Britain considered it politically or economically beneficial to maintain the global institution, the creation of British citizenship was repeatedly rejected as detrimental to their objective, and did not become the aim of the political project of belonging. Instead, the aim was to manage the variegated system within a global institution to maintain British subjecthood and later Commonwealth citizenship, while enabling the emergence of a national type of citizenship. Complex rules of citizenship and immigration were devised in response to the building and expanding of the British Empire and its transformation to the Commonwealth. Because of these rules, the successive political projects of belonging under study could not ignore external influences or those of post-imperial relations with the outside world.

Second, the fundamental aim of the political projects of belonging since 1981 was to find certain values and ideas to adjust to the long process of the conceptualisation of 'Britishness'. The event(s) that triggered the projects influenced the outcomes thereof and how these were embodied in legislation. For Britain, Brubaker's 'eventful perspectives' of nationhood had to be adopted. Without this perspective, the process of defining and redefining 'Britishness' since 1981 cannot be accounted for. The conception of 'Britishness' is therefore destined to remain in transition, always containing diversity at its core. According to John Darwin, a leading scholar on British imperialism and decolonisation, 'the home-grown amalgam of Britishness' was being formed before the Second World War as the Imperial counterpart to the 'progressive, outward-looking, and

internationally minded' 'Britannic' culture²¹⁾. Of course, this understanding of 'Britishness' could not stand amidst the increasing volume of immigrants to Britain from the (former) colonies and continent of Europe. Since the Second World War, the United Kingdom itself, not the Empire or Commonwealth as the 'global institution,' needed to integrate with what had domestically existed alongside these 'Britannic' elements, which had to be progressive, outward looking, and internationally minded.

The 'eventful perspectives' on nationhood enable us to elucidate why British immigration/nationality policies seem to highlight the intention of policy-makers to discriminate against certain people and exclude them as true members of British society. Some scholars argue that the post-imperial political projects of belonging were 'destined to fail specific groups and populations'²²⁾, for which the BNA 1981 laid the legal basis. For them, BNA 1981 was established with the firm intention to reconstitute British citizenship to exclude those groups. However, this paper questions if policy-makers at the time of the enactment of BNA 1981 could have conspired to enact the nationality legislation, intending to establish the foundation for the continuous exclusion of certain groups of people from British citizenship. This is the third point which this paper aims to demonstrate. The political project of belonging in Britain is complex, leading to the frequent redefinition of the meaning of 'Britishness'. Retrospectively, it seems that immigration/nationality legislation in Britain during the post-imperial and pre-Brexit period has been designed to be discriminatory and restrictive to specific groups of people. However, the examination of the years 1981 and 2002 reveals that it is more likely that responses to the specific events of the time in the field of immigration/nationality and external policies resulted in the then political projects of belonging.

21) Darwin, John, 'A Third British Empire? The Dominion Idea in Imperial Politics' in Judith Brown and WM Roger Louis eds., *The Oxford History of the British Empire: Vol. IV; The Twentieth Century*, Oxford University Press, 1999, p. 71.

22) For example, see Tyler, Imogen, 'Designed to Fail: A Biopolitics of British Citizenship', *Citizenship Studies*, vol. 14, no. 1, February 2010, p. 61.

