

■ **Post-colonial migration and citizenship regimes: a comparison of Portugal and the United Kingdom** ***Regimes pós-coloniais de migração e cidadania: uma comparação entre Portugal e o Reino Unido***

Ana Paula Beja Horta* and Paul White**

Resumo Este artigo oferece uma perspectiva comparada das práticas e regimes de cidadania em Portugal e no Reino Unido. É defendido que as práticas coloniais nos dois países se intersectam no que respeita a algumas noções legais de equidade no âmbito dos dois impérios coloniais. No entanto, estas não se viriam a traduzir em visões similares sobre a relação entre a metrópole e o espaço colonial. No caso português a descolonização foi um evento rápido e traumático, enquanto no Reino Unido este processo foi-se desenrolando progressivamente ao longo dos tempos. Inicialmente o estatuto de cidadania das populações das colónias configurou-se de forma oposta no Reino Unido (regime liberal) e em Portugal (regime exclusivista). Contudo, no período pós-colonial, a evolução do regime de cidadania foi marcado por uma visão mais inclusiva no caso português e por uma política mais restritiva no caso britânico. A reinvenção de um mundo culturalmente lusófono tornou-se um importante discurso em Portugal, privilegiando assim os emigrantes das ex-colónias. Presentemente, no Reino Unido tais considerações são pouco significativas num contexto em que *ius sanguinis* ganhou particular relevância na atribuição da nacionalidade.

Palavras-chave regimes pós-coloniais, cidadania, migrações, Portugal, Reino Unido.

Abstract This paper compares the practices and citizenship regimes in post-colonial Portugal with those of the United Kingdom. It is shown that colonial practices in the two countries shared certain legal concepts of status equality within their empires, but that these did not translate into similar visions of the relationship between the metropolis and the colonial space. Portuguese

* Universidade Aberta, Departamento de Ciências Sociais e Políticas / Open University, Department of Social Sciences and Politics (aphorta@univ-ab.pt)

** Universidade de Sheffield, Departamento de Geografia/ University of Sheffield, Department of Geography (p.white@sheffield.ac.uk)

decolonisation was a sudden and traumatic event, whereas the process was more drawn-out in the UK. Citizenship status for former colonial subjects was initially opposed in the UK (with a liberal regime) and in Portugal (exclusive regime). However, the post-colonial period in both countries has been marked by evolution, with Portugal liberalising and the UK becoming more restrictive. The discourse in Portugal on reconnecting the Portuguese-speaking world and its cultural realm has gained importance, thereby privileging migrants from the former colonies. Such considerations now play a negligible role in the UK, where issues of *ius sanguinis* have grown in significance in the attribution of nationality.

Keywords post-colonial regimes, citizenship, migration, Portugal, United Kingdom

■ Post-colonial migration and citizenship regimes: a comparison of Portugal and the United Kingdom

Ana Paula Beja Horta and Paul White

Introduction¹

The period since the Second World War has witnessed two major, and to some extent interconnected, phenomena in Western Europe: the splitting up of former European colonial empires, and the arrival of large numbers of migrants to augment the European labour force. Destination countries that were, or had recently been, colonial powers, such as France, the United Kingdom and the Netherlands, in part drew on overseas colonial labour supplies. But states without a colonial heritage also experienced a need for migrant labour, sourcing it from countries with which they had no historical political ties. Such was the case for Germany and Switzerland, for example.

In the ensuing period, many studies have adopted a comparative perspective in the examination of political responses to labour migration and the presence of new communities of migrant origin. A number of such comparisons have been made between the major labour-receiving states of North-West Europe – for example, Cross and Entzinger (1988) studied the arrival of Caribbean migrants in the Netherlands and the UK; Brubaker (1992) has compared the very different evolution of policies in France and Germany; and Piper (1998) has contrasted immigration and ethnicity in Germany and the UK. One important issue that emerges in such comparisons relates to the difference in political responses between states with and without colonial pasts. Such studies have enhanced our understanding of very different citizenship regimes, operating in different historical, cultural and economic circumstances. They have also emphasised the role of the conceptualisation of national identity and of the idea of the nation – for example in *ius sanguinis* and *ius soli* approaches to debates over belonging and citizenship rights.

The last thirty years have witnessed the initiation of large-scale migrant flows into new Southern European destinations. There are certain common trends and features of these migration systems: for example, they started within a relatively short period of time in the mid- to late 1970s; they all involved a net reversal of long-standing patterns of emigration; they presented significant elements of irregular migration; and informal sectors of the economy provided employment opportunities. However, there are also significant differences in context between several of the Southern European destinations. One of these, Portugal, shares important features with some of the Northern European migration destinations. Notably, Portugal was, until 1974, a major colonial power, such that its

recent experiences have matched those of France, the United Kingdom and the Netherlands in involving both decolonisation and the reception of significant migrant flows that include many people from the former colonies. In this respect, Portugal is distanced from the experiences of Italy and Greece where the new migrant streams originated primarily in source areas without previous political connections. Spain's experience is also partly post-colonial, in that some migrants originated in ex-colonies - but the time lag between colonial independence and the generation of migrant streams was considerable. In Portugal, on the other hand, independence for the colonies immediately after the revolution of 25 April 1974 was directly followed both by a large-scale flow of *retornados* (returning settlers) from the former colonies and by an increase in new labour migrant flows and other refugee influxes from Angola and Mozambique in particular.

Comparisons of immigration and citizenship between different European countries have not been extended to include detailed consideration of the Portuguese case alongside the more familiar examples mentioned earlier. Yet Portugal shares with the UK, France and the Netherlands the fact that immigrant flows over the past four decades have taken place in a context of lingering post-colonial relationships with significant potential migrant source areas. As with the North-West European ex-colonial powers, discourses and policies relating to citizenship for immigrant populations have been shaped by colonial and post-colonial history. This paper aims to provide a new line of comparative discussion by examining experiences in Portugal against the framework provided by the more familiar history of the United Kingdom. The paper examines similarities between Portugal and the United Kingdom, but it also demonstrates that there are significant differences between the two sets of post-colonial responses. The paper takes a broadly chronological perspective, starting with a brief consideration of the nature of Portuguese and British colonial policies. It then outlines the decolonisation process before going on to consider the evolution of thinking and policy formation about migration and citizenship throughout the post-colonial period. It concludes with a reflection on the diverse nature of post-colonial discourses and practices in the two countries.

The context of colonial policies

It is first of all necessary to provide an overview of certain important features of the colonial regime in Portugal and to contrast these with the UK. Such features provide the context within which post-colonial thinking on migration and citizenship issues has emerged. It is not the intention here to provide an exhaustive critique of Portuguese and British colonialism (such discussions can be found in Figueiredo, 1975; Mattoso, 2001; Dirks, 2001; Darwin, 1988).

Two inter-related issues merit discussion here. These concern the ways in which the metropolis conceived of its relationship with its colonies; and the ways in which the colonial powers perceived colonial populations or subjects. The contrast between Portugal and the United Kingdom is profound in the first of these. The UK's relationship with its colonies changed through time, but generally harboured a paradox by which elements of racialisation in colonial discourses were rarely converted into specific policies. The creation of the "white" dominions (South Africa, Canada, New Zealand and Australia), in the early years of the twentieth century, established independent units that held a special relationship with what was generally seen as the "mother-country". Most of the other overseas British possessions (with exceptions such as Southern Rhodesia - now Zimbabwe - and Kenya) were not regarded as places of white settlement and were perceived in a homogenous way as "true" colonies. India should also be seen as an exception, remaining the "Jewel in the Crown" up to Independence and Partition in 1947. However, during key periods of the decolonisation process, British migration and citizenship policies did not differentiate between those living in or seeking to migrate from the white dominions and those from other colonial or post-colonial territories. Despite the passing of the British Nationality Act of 1948, the UK Imperial Act of 1914, which defined all British subjects as equal before the law, remained the basis of policy until 1981 (Hansen, 1999), well after the decolonisation process had passed its peak. Therefore there was no essential legal difference between, for example, a Canadian, a Nigerian or an Indian in their relationship to the British state and the British crown.

The hegemony of Britain itself was taken for granted, nevertheless. British national identity, throughout the late years of colonialism, was based in part on an imperial ideology which saw the UK metropolis as superior to, but responsible for, the colonial world. At no point was there ever any serious argument that the British overseas possessions, as they stood in this period, should be regarded as an integral part of the British nation or state. Instead the concept of a British "Commonwealth", with the British Crown at the centre, was promulgated strongly from the early post-war years - arguably representing a continuation of imperialism under a new guise.

Portuguese imperialism did not create any independent "dominions" to parallel those spawned by Britain. Ideologically, from the late nineteenth century, the Portuguese colonies were perceived as an integral part of the nation. The term colonies (*colónias*) and provinces (*províncias*) were used interchangeably and the overseas territories were considered as being as "sacred" as the "national motherland". This imaginary was translated into the attribution of equal status to all citizens of the Portuguese nation, with no distinction being made between those living in the metropolis and in the colonies (João, 2001). Although the discourse was of equality, pragmatically the notion was really only of potential equality based on a successful process of assimilation.

Such an assimilationist policy was at the heart of Portuguese colonialism for many decades. It was grounded on the idea that the nation had a “civilising mission” and, therefore a responsibility to transform “uncivilised” African, Timorese and other “native” peoples into full members of the Portuguese nation and of the European cultural realm, following a process of gradual transformation of their values, customs, and social, cultural and religious practices. This policy had its heyday under the Salazar regime, but it had already come into existence during his predecessors’ administrations.

Administratively, from 1914 to 1926 Portuguese colonial rule was characterised by a policy of decentralisation, allowing for greater autonomy for the colonies. The new laws (*Cartas Orgânicas*), promulgated in 1917, set the foundation for decentralised financial and administrative government. Also, it established ruling norms regarding the indigenous African and Timorese populations who were supposed to be protected and “tutored” by the governor and his delegates. This condition of “indigenosity” was never attributed to the peoples of Cape Verde, India and Macau, who had the status *ipso facto* of full citizens (Figueiredo, 1975:79). Differential rights were allocated to indigenous peoples regarding their cultural traditions and customs. On the other hand, they did not have any political rights, except those concerning their tribal life (Oliveira Marques, 1998).

With the new military dictatorship in power between 1926 and 1933, the republican colonial policy of decentralisation came to an end. From the 1930s onwards, and with the consolidation of Salazar’s dictatorial regime, an ultra-nationalist ideological shift reconfigured Portuguese colonial rule. A new official discourse on the overseas possessions emerged during this period, establishing the colonial guiding doctrine of Salazar’s regime from 1932 until his death in 1968.

Based on the “Indigenous Statute” promulgated in 1926, the Colonial Act (*Acto Colonial*) of 1930, elaborated by Salazar who was at the time the Deputy Minister of the Colonies, was conceived of as a sort of “constitution” for the emerging Portuguese Colonial Empire (*Império Colonial Português*). In the new legislation, four major aspects deserve special attention. First, it vigorously reasserted a vision of the Portuguese nation as having the “historical mission to possess and colonise the overseas territories and civilise the indigenous populations residing therein”. Second, it rejected the republican policy of colonial autonomy and decentralisation, introducing instead a highly centralised ruling system. Third, it established new clauses regarding the indigenous populations, who had the right to be protected and to freedom of expression, work and property. However, the state had the right to force them into labour on public works. In fact, conscripted labour and the appalling exploitation of Africans became the trademarks of Portuguese colonialism for the next three decades.² Finally, special status was allocated to indigenous persons according to their degree of “evolution”, as long as

their traditions did not collide with “moral virtue”. As soon as the indigenous were considered “europeanised”, and thus became assimilated (*assimilados*), they could, in theory, enjoy the same rights as any other Portuguese citizen.

In sum, this assimilationist policy created an official categorisation of the population into three major groups, consisting of Portuguese citizens, *assimilados*, and the remaining “native” or indigenous populations (*indígenas*). According to Oliveira Marques (1998), the number of *assimilados* grew only slowly.³ Also, thousands of “civilised” Africans refrained from applying for the status of *assimilado*, given that such status would oblige them to pay taxes at the rates levied on “European” citizens of the colonies. Furthermore, the *assimilados*, whilst possessing formal citizenship, were hardly considered full citizens and were the object of blunt social and economic discrimination. Therefore they did not enjoy what has been termed “substantive” citizenship (Piper, 1998).

After the Second World War, international condemnation of Portuguese colonial rule and domestic opposition to colonial “forced labour” practices of exploitation, hidden forms of slavery and economic stagnation in the colonies led Salazar to re-package Portuguese imperialism in a more acceptable form (MacQueen, 1997: 11). Amendments were made to the Constitution in 1951 by which the expressions “colonies”, “Colonial Empire” were eliminated and replaced by the “Overseas Provinces” (*Províncias Ultramarinas*) and “Portuguese Overseas” (*Ultramar Português*). Moreover, the status of the “indigenous” was officially defined as transitory. In 1953 a new law was passed, the Organic Law of the Portuguese Overseas (*Lei Orgânica do Ultramar Português*) and a new Indigenous Statute for the Provinces of Guinea, Angola and Mozambique was promulgated in 1954.

These reforms attempted to ease the external and internal pressure on Portuguese colonial rule while, at the same time, reflecting the state’s willingness to tighten its grip on the colonies. The overseas provinces were now represented as an “integral part” of the Portuguese nation. In the words of the Minister for Foreign Affairs of the *Estado Novo*, Franco Nogueira, “we [the Portuguese] consider ourselves also as an African nation through integration and the existence of multiple races” (cited in Oliveira Marques, 1998: 535). In fact, in the 1950s and especially in the 1960s, the official discourse appropriated Gilberto Freyre’s thesis on luso-tropicalism, using it as a semi-official colonial policy. Its core elements stressed, on the one hand, multiracialism and cultural mixing, and on the other hand, national unity and belonging. Thus, Portugal was to be distinguished from other colonial powers because its colonial rule aimed at the construction of a unique multiracial community. In practical terms, such discourse was used to legitimise the systematic refusal of Salazar’s regime to comply with UN dispositions and resolutions on colonial rule as well as to lobby international public opinion and seek support for the maintenance of the Portuguese colonies.⁴

In 1961, new administrative reforms were introduced whereby the Indigenous Statute (*Estatuto dos Indígenas de Angola, Moçambique e Guiné-Bissau*) and the status of *assimilado* were abolished. From then on, for the final years of Portuguese colonialism, all the residents of the overseas provinces, including the inhabitants of Angola, Mozambique and Guinea, became, in theory, full citizens of Portugal.

This idea of a complete fusion between the metropolis and the overseas possessions was expressed in an integrationist policy which gained ground after 1950. To Marcelo Caetano, who succeeded Salazar after his death in 1968, such an approach constituted a re-making of the assimilationist policy. The Portuguese nation was perceived as a “single reality” in which all the inhabitants of the overseas provinces, independent of their culture, had the status of (full Portuguese) citizens (cited in Oliveira Marques, 1998: 536), but with Portugal as the central core. For Caetano, this integrationist approach failed to take into account the new social, economic and political realities of Portuguese Africa. During his mandate, a federalist policy was attempted through the re-introduction of economic and administrative decentralisation measures. In the overseas possessions, local assemblies, commissions and village councils were created and recognised as legitimate representative bodies. A greater sensitivity towards tribal ways of living and centuries-old traditional institutions and practices denoted a more flexible approach to cultural differences.

The reforms intended by Caetano had hardly been implemented in full at the time of the coup in 1974. According to MacQueen (1997), Caetano’s profoundly indecisive character, coupled with deep structural constraints and a rigid institutional legacy, were key factors in the unfolding of events in 1974 and in the abrupt dissolution of the empire.

In symbolic terms, ideologies in relation to overseas “possessions” were represented in very different ways within the UK and Portugal. Where in the UK atlas maps painted large parts of the world “red” as British, maps of Portugal commonly represented the state itself as comprising both the metropolis and all its colonies together. The *Portugal dos Pequeninos* at Coimbra, a famous model village constructed in the inter-war years, still displays models of Angolan and Mozambican settlements as integral aspects of the display of all Portugal’s provinces. Such a representation of national space would have been inconceivable in Britain at the same period (or since). Nevertheless, on the verge of independence, colonial subjects from both powers held passports from the metropolis.

British colonial attitudes were essentially dominated by a consistent vision of the relationship between subjects - wherever in the world they were located - and the British crown. But Britain itself was seen as territorially and ontologically

separate from territories and states overseas that owed it certain allegiances. In contrast, the relationship between Portugal and its colonies (and their inhabitants) varied through time. For significant periods they were seen as territorially integrated, but it was only in the last years of the Portuguese Empire that the ideology of one integrated people fully emerged. This differed from discourses in other European empires (Castello, 1998: 97).

In terms of post-colonial history in the UK and Portugal, it is also important to note that the Portuguese Empire was anchored by Catholicism, the Portuguese language and by cultural links related to this. In contrast, the British Empire was much more diverse in religious affiliation, with parts of it held together more by administrative structures than by cultural affinities. Portuguese colonial rule was challenged by the independence movements of the 1960s and 1970s, but even after their “success”, the cultural similarities of religion and language remained as potential links to the metropolis.

The decolonisation process

Decolonisation was a very long-drawn-out process for the United Kingdom, but for Portugal (with certain exceptions, such as the early loss of Brazil, the Indian possessions, wrested from Portugal by India itself in 1961, and Macau – see Aldrich and Connell, 1998) the loss of the colonies was a sudden episode associated with the Revolution of 1974 and the establishment of democracy in the metropolis.

Just as the UK lost its North American possessions south of Canada as a result of the American War of Independence, so Portugal lost its major overseas possession through the independence of Brazil in 1822. This paralleled Spain’s loss of South American possessions during the same era. However, after the loss of Brazil, as demonstrated in the previous section, Portugal resisted further losses and “dug in its heels” (Ciment, 1997: 33), actually intensifying settlement and exploitation efforts well into the post-war period when decolonisation was firmly on the agenda in the UK, France and elsewhere.

The decision of the new Portuguese democratic regime to withdraw from its colonies lay to a large extent in its reluctance to continue the gruelling wars to maintain its possessions, particularly in Africa. According to MacQueen (1997), that withdrawal was less for ethical reasons than to avoid military humiliation. Any drive to retain the colonial possessions would have been opposed by a war-weary public in the metropolis. Indeed, opposition to the colonial wars had played a significant role in fermenting the 1974 Revolution itself (Aldrich and Connell, 1998: 48).

Decolonisation was, nevertheless, not a smooth process. Colonial populations had not been prepared for independence; colonial wars had exacerbated factional differences that threatened political stability; massive return flows of “whites” to Portugal took place; and international interests also played a role. Thus China refused to allow the immediate decolonisation of Macau, and Indonesia promptly invaded the old Portuguese territory of East Timor. Events in the newly independent states such as Angola and Guinea-Bissau became entangled in Cold War politics involving the USA and the USSR.

The severing of political ties to Portugal did not remove all potential for contact. As well as trade and other economic links, ex-Portuguese provinces were left with the legacy of the Portuguese language and with adherence to various aspects of Portuguese culture. Portugal itself could act as a bridgehead to Europe for these newly-independent states. Were Portugal itself to need labour at any future point, an obvious source would be its ex-colonies. Were the populations of those ex-colonies to seek migratory destinations, Portugal would be an obvious possibility. The relatively high rates of economic growth enjoyed by Portugal from the late 1970s through the period of accession to the European Union (1986) established favourable conditions for such labour movement.

Decolonisation in the UK occurred from 1947 onwards, with a major flurry of activity during the period between 1957 and 1969, but with further episodes continuing over the following two decades. The process is, of course, still incomplete with the UK as the colonial power for territories such as Bermuda, the Cayman Islands, the Falkland/Malvinas Islands, and Gibraltar. The circumstances of decolonisation by the UK were much more varied than those that applied in the Portuguese case, and evolved through a variety of economic conjunctures and under different governments. Unlike the Portuguese ex-colonies, independence normally followed an extensive period of tutelage during which the institutions of self-rule were developed with British assistance. There was also a less dramatic severing of political ties with the UK since in almost all cases the newly independent ex-colonies chose to take up membership of the British Commonwealth and many retained the British monarch as Head of State: a number also retained the House of Lords in London as an effective “supreme court of appeal”. In 1974, Portugal made no attempt to retain any links with its ex-colonies such as through a “Commonwealth” or wider Portuguese community.

As with Portugal, many British ex-colonial populations shared the language of the metropolis, such that the circumstances facilitating future migration were also left in place. However, whilst native Portuguese speakers in the world number only Brazilians, in addition to the ex-colonies of the 1970s, native English speakers exist in many areas of the world that were not subject to British decolonisation during the post-war period. The choice of English-speaking countries to migrate

to is also much more predominant among native English-speakers than native Portuguese-speakers. As already indicated in the introduction to this article, decolonisation by the UK ran in parallel with major labour migration to the country.

Migration and citizenship at decolonisation

On the eve of decolonisation there were remarkable similarities in legal status for many colonial subjects of the British and Portuguese regimes. Residents of Angola, Cape Verde, Sao Tomé and elsewhere within the Portuguese overseas provinces held Portuguese citizenship and also enjoyed the right of access to the Portuguese mainland as free immigrants. The equivalent circumstances had existed for residents of all British colonies up to 1962 when British legislation changed. The rights of British ex-colonial subjects at the moment of decolonisation varied according to the actual date of decolonisation – reflecting the extended period over which the process occurred. There was much less diversity in the Portuguese case.

Portugal

After the coup of 25 April 1974, the commitment to complete and swift decolonisation had a direct impact on the status of colonial populations. If until then these populations were considered, at least in the letter of the law, Portuguese citizens, after the decolonisation process they only had access to the nationality of the newly independent territories. In effect, most residents of the Portuguese colonies were stripped of their Portuguese citizenship. In June 1975, Decree-Law 308-A/75 introduced a new regime of citizenship rights according to which colonial populations born in the colonies lost their Portuguese citizenship status if they had been residing in the newly-decolonised countries at the time of independence. Those born in the overseas territories could only maintain their Portuguese citizenship if they had resided in the metropolis or in the archipelagos of Madeira and the Azores for the five years immediately preceding April 1974. However, the new legislation did not apply to Timorese populations or to the residents of the former possessions of Portugal in India who were then residing in Portuguese Africa, especially in Mozambique. These populations could maintain their Portuguese nationality if they chose. In both cases this decision related to refugee issues – East Timor had been invaded by Indonesia on independence, whilst Ismaili Muslims had fled Portugal's Indian possessions when the Indian Army had arrived in 1961.

The intricacies and complexities embedded in the new legislation were highly contested by different sectors of Portuguese society. One of the major controver-

sial outcomes of the legislation was the fact that African-born people who had enjoyed full Portuguese citizenship rights suddenly became totally disenfranchised. Besides those who had resided in Portugal for less than five years before 25 April 1974, there were also thousands born in Portuguese African territories who were residing abroad in third countries at the time of independence. These populations lost their Portuguese nationality and, given the implementation of restrictive citizenship laws by the newly-independent countries, in most cases became stateless. These laws were weakened in 1988, but the new regulations still proved to be rather restrictive to those who did not fulfil new residence requirements.

One of the major outcomes of the process of decolonisation was the massive repatriation of Portuguese of European origin residing in the ex-colonies, mainly from Angola and Mozambique: these constituted 94 per cent of the total number of registered repatriations which amounted to 505,078 (INE, 1981). According to Pires (1987), these official figures grossly underestimated the total flows, which he estimated at as high as 800,000. Secondly, in the aftermath of decolonisation, civil wars and famine in Angola and Mozambique in the late 1970s precipitated the exodus of large numbers of refugees, the majority of whom settled permanently in Portugal. For others, Portugal functions as a migratory platform from which migrants re-emigrated to other European countries and to the American continent. Although during this period migratory flows included labour migrants, overall inflows to Portugal in the 1970s were characterised by asylum seekers from the Portuguese-speaking countries of Africa, known by the acronym PALOP - *Países Africanos de Língua Oficial Portuguesa* (Machado, 1997). Moreover, the revolutionary process of the mid-1970s within Portugal, and the consequent weakening of social regulation, made it particularly difficult to impose strict controls on migrant inflows. During this period, growing numbers of migrants from the ex-colonies, especially from Cape Verde, were either entering the country illegally, or becoming illegal as they remained on expired visas. As we will discuss below, in the next two decades Portugal consolidated its position as a country of destination of major migration flows from Lusophone Africa and Brazil.

The United Kingdom

In contrast to Portugal, the UK did not generally see it necessary to act immediately to change the citizenship and migration status of newly-decolonised populations. However, as decolonisation gained pace the ideology of a Commonwealth without internal borders became increasingly unsustainable. A proud belief in *Civis Britannicus sum*, and the notion of an indivisible British Empire, had ensured that, despite a growing unease about the prospect of mass immigration from the former colonies, an "open door" policy was maintained until 1962. The policy turn-around was rather slow in the making, as post-war governments were

reluctant to let go of the concepts that had so long been central to the ideology of the British Commonwealth.

The attachment to the principle of unity among British subjects, mentioned earlier, had been designed primarily to ensure free movement to and from the Dominions: it is a paradox that it came to facilitate immigration into the UK from a series of “non-white” colonies and ex-colonies (Hansen, 1997).

It is worth remembering that, as in all other European immigration destinations of the period, there was a general perception that any movement from less developed origins was temporary in nature. It was therefore not until the reality of New Commonwealth settlement became apparent that restrictive changes were instigated, and this did not occur until the 1960s. The year 1948 saw the passing into legislation of the British Nationality Act. Despite a popular belief that this was a reaction to the independence and partition of India and Pakistan earlier in the same year, Hansen (2000) has identified the principal motivation for the Act as changes instigated in the nature of Canadian citizenship, which had created a separate status of Canadian citizen as a local supplement to subject status under the British crown. The Act itself formed part of the decolonisation process, in formalising the capacity of Commonwealth governments to define their own notions of citizenship, whilst retaining access to British subject status.

This latter initially guaranteed freedom to travel throughout the Commonwealth, thus permitting citizens of newly independent states to have full access to the United Kingdom. The Act therefore made provisions for the continuation of Commonwealth citizenship, and in this respect did not fundamentally alter the commitment to the Old Commonwealth (or “white” dominions) in particular. After 1948 these countries enjoyed both the power to define their own citizenship (and control immigration, as Australia did, for example), and also to have full access to the “mother country” – the UK. Thus, the “door” was still very much open, theoretically affording around 800 million individuals the right to enter and settle in the UK.

Only newly independent countries which left the Commonwealth lost the right of entry to the UK for their citizens as a result of the 1948 Act (Walmsley, 1998). Examples included a number of protectorates and other territories in the Middle East, such as Kuwait and Qatar: special dispensations were made for Ireland, which left the Commonwealth in 1949.

During the period 1948 to 1962 around 500,000 primary migrants arrived in Britain, principally as labour migrants, both from colonies and from ex-colonies (Hansen, 2000). Within this period the status of many countries changed – with major decolonisation in Africa and the Caribbean. Public attitudes towards this “coloured”

migration were arguably not as liberal as those of the government, and in particular those of the Conservative government first elected in 1951, which viewed immigration from the New Commonwealth as the price worth paying for maintaining links with the Old Commonwealth (Hansen, 2000). Restrictions on these numbers were considered in 1954, but rejected as racist.

However, according to Spencer (1997), the reality of this apparently warm official welcome was rather different. Having granted more autonomy to many of its colonies, the UK required the cooperation of those governments in controlling migrant flows. This was achieved with varying degrees of success, with India and Cyprus erecting many diplomatic hurdles, including requiring passport endorsement, demonstrating the existence of sufficient funds and family connections in order to emigrate. Some colonies, such as Jamaica, were not as willing to support this obstructionism, and subsequent persuasion attempts and propaganda campaigns did little to curb flows of migrants to the UK, resulting in stronger action being reconsidered.

The circumstances of peoples in countries that were newly-decolonised from 1962 onwards were rather different. They did not always enjoy the automatic right of abode in the UK that had applied to earlier independent populations. This was because of the progressive institution of more restrictive legislation.

The evolution of citizenship discourses and rights since decolonisation

In both the United Kingdom and Portugal the years since decolonisation have seen a number of shifts and changes in discourses on the ex-colonies and the potential migrants who might arrive from them to the ex-metropolis. In this final substantive section of the paper we reverse the previous order of the discussion, to consider the United Kingdom first – as the period since decolonisation is longer there than in the Portuguese case, and some developments occurred before Portuguese decolonisation. There is no evidence, however, that either state observed, or learned from, the experience of the other.

The United Kingdom

The changes of direction in discourses and policies have been particularly complex in the United Kingdom. During this extended period the thinking regarding migrant inflows from the ex-colonies, and citizenship rights for those originating there, was progressively transformed from a very liberal and open regime to one of considerable control.

Amidst growing hostility towards the sharp rise in the number of immigrants from the New Commonwealth countries, and the threat of yet further migration, the government could no longer resist a decision to limit the numbers entering the UK. This decision came in the form of the Commonwealth Immigrants Act of 1962, and was perhaps the most significant turning point in post-colonial immigration policy. The Act did not alter the right of abode held by British subjects under the British Nationality Act 1948, but it denied many their right to enter the country and exercise that right. This rather complex notion of a singular nationality with differing rights existed from this point through the further years of decolonisation until 1981. Indeed, this interesting subtlety is actually still evident to the present day, and has become somewhat of a defining trait of British citizenship practice in so much as immigration and citizenship discourses have become increasingly discreet, and often at odds.

Ironically, however, Commonwealth immigration continued to increase following the 1962 Act as it continued to permit family reunification, and as the decade progressed, restrictive legislative tendencies continued. At a time when the official line on immigration was hardening, the unprecedented expulsion of Asians from Kenya (1968) and Uganda (1972) proved to be a significant challenge to the UK's citizenship legislation, and raised some interesting questions about belonging in the post-colonial era. Legally, the majority of the East African Asians were British subjects under the 1948 legislation, but their right to enter the UK freely was restricted by the 1962 Act. When they were expelled by the Kenyan and Ugandan regimes they had nowhere to go, and the UK government felt morally obliged to allow them to enter as refugees. The situation forced yet another re-examination of citizenship policy and brought a significant shift towards *ius sanguinis* modes of citizenship determination.

In 1968, a second Commonwealth Immigration Act aimed to reduce immigration by requiring that immigrants demonstrate existing connections in the UK. This idea was taken further when the element of patriality entered the policy landscape formally in 1971 with the Immigration Act, which was enforced from 1973. For the first time, immigrants needed to demonstrate descent from a British person within two generations in order to qualify for the right of abode. The margins were relatively less generous than the equivalent Portuguese parameters set in 1981 (see below), which allowed for lineage up to three generations back. Furthermore, the Immigration Act put a stop to future family reunification. The 1971 Act did not distinguish between Commonwealth and other immigrants in its application, though clearly citizens of the "white" Dominions were privileged by this move because of the history of white emigration from the UK, and the policy was attacked for its racial overtones. As Spencer (1997) points out, at the same time, movements of Europeans in and out of the UK became much less restricted when the UK joined the European Economic Community in 1973. Whilst the 1971

Act temporarily enhanced *ius sanguinis* elements in the law, it should not be interpreted as an abandonment of *ius soli*, as children born to any legally residing person in the UK could still claim citizenship.

Citizenship laws over this period tended to build upon one another, and as successive legislation rendered the British Nationality Act of 1948 increasingly obsolete, Thatcher's government took determined measures to "tidy up" the law in a single set of reforms under the British Nationality Act, 1981. This Act, which came into force in 1983, formally replaced the 1971 Act and the idea of patriality. The rather dated organising concept of British subjecthood was discarded, and replaced by formal British citizenship, British Dependent Territories Citizenship (BDTC) and British Overseas Citizenship (BOC). The latter two groups constitute exceptions made to accommodate the issues of remaining colonies such as Gibraltar and Hong Kong (at that time), and show the continuing need for regulatory frameworks for colonial situations at the end of the twentieth century in Britain's case. The 1981 legislation perhaps represents a final stage in moving towards a singular definition of citizenship in the UK.

Paradoxically, although the rights of citizens of former colonies to enter the UK have been gradually diminished since 1962, the law regarding naturalisation has remained curiously liberal since 1971. Any foreigner need only reside for five years in the UK, and demonstrate a basic grasp of one of the British languages. Despite one or two other minor requirements, the UK's stance is significantly more relaxed than that of most other European countries, highlighting again the distance between immigration and citizenship policies. In addition, even without naturalisation, Commonwealth citizens enjoy the right of full participation in the electoral process in the UK.

Since decolonisation, the UK has therefore struggled to balance ideology with realistic immigration and citizenship laws. In effect, the British Nationality Act 1981 can be seen as an attempt to close the colonial chapter. The 1981 Act marked the final separation of immigration and citizenship policies, in which distinctions had for some time been somewhat confused. Importantly, Commonwealth membership has diminished significantly as a criterion for favourable treatment under the law.

Portugal

From 1974 onwards, the increasing influxes of migrants and refugees from the ex-colonies to Portugal were met with growing anxiety. In 1981, a more restrictive citizenship law (Law 37/81) was introduced. Where the previous law was based on a balance between *ius soli* and *ius sanguinis*, the new regulations largely privileged *ius sanguinis*. For Esteves (1991), this shift in the definition of citizenship was rooted

in nationalist fears fuelled by increasing inflows of migrants as a consequence of decolonisation. However, whilst on the one hand the new law restricted immigrants' access to citizenship, on the other hand it facilitated the reacquisition or acquisition of nationality by Portuguese emigrants and their descendants living abroad. According to the new law, those born abroad in non-Portuguese-speaking countries whose parent, grandparent or great-grandparent had Portuguese nationality could apply for Portuguese citizenship. Foreigners born in Portugal could only apply for Portuguese citizenship if their parents had lived in the country for at least six years. The introduction of regulations allowing for dual citizenship also favoured Portuguese emigrants who had acquired a different nationality and consequently had to previously forego Portuguese citizenship.

This greater sensitivity towards Portuguese emigrant communities underlined a major ideological shift in the conception of Portuguese nationhood. In the 1980s, official representations became increasingly tied to a conception of the nation as an imagined community of descent which transcended territorial boundaries. Special rights, privileges and the creation of institutional channels for the full participation of Portuguese emigrants and their descendants in Portuguese society attempted to strengthen the economic, cultural and ethnic bonds between Portugal and its communities abroad (Aguiar, 1999; Rocha-Trindade, 1995). The envisioning of Portugal as "a nation of communities" (Aguiar, 1999:19) reflected a self-understanding of the nation in which Portuguese emigrants became a significant element. Such an understanding has never played a role in British views of the nation. But if the new Portuguese national imaginary embraced the long-forgotten and often neglected "Portuguese of the Diaspora", the process of incorporation of those citizens from the ex-colonies with whom Portugal had established historical and cultural ties remained highly ambiguous.

In institutional terms, the relationship between Portugal and its ex-colonies remained strained until the end of the 1980s due to the trauma of decolonisation and fear of accusations of neo-colonialism. However, this situation changed substantially in the 1990s. The admission of Portugal to the European Union in 1986 was of key importance for the future of newly-democratic Portuguese society in many respects that go beyond the scope of this paper. However, it is important to point out two major aspects which bear directly upon the thrust of this analysis. One has to do with the reconfiguration of Portuguese nationhood after the loss of an empire that, in territorial extent, had been twenty-four times bigger than metropolitan Portugal. In symbolic terms, a complex process of deterritorialisation / reterritorialisation and subsequent deterritorialisation of national identity was prompted by the demise of the empire and the integration of Portugal into the European Union. In 1974, the notion that the national territory somehow extended itself into Africa, and that the colonial empire was an integral part of one single and individual state, crumbled. After decolonisation, Portugal had

to come to grips with a state reduced to its diminutive geographical dimension. However, this new process of “reterritorialisation” was short-lived, for integration in the EU prompted a new process of “deterritorialisation”. In other words, concomitant with the construction of a new national community was a process of transnationalisation implied by Portugal’s accession to the European Union. As Santos (1994: 136) aptly remarked “In less than twenty years, the transnationality of colonial space is transferred to a European transnationality in which Portugal continues to occupy a relatively peripheral situation”. After centuries of colonialism and isolation, the “return to Europe” implied a redefinition of national identity and citizenship discourses within a European framework.

During the corporatist regime of the *Estado Novo*, there had been no concept of individual rights as citizens; although individual rights were enshrined in the constitution they could only be expressed through membership of the nation, of the “people”, or of particular interest groups. Discourses on citizenship and individual citizenship rights were thus very much confined to the regime’s opponents. After the coup in 1974, issues of citizenship were taken up by the socialist party, which fiercely advocated the integration of Portugal into the European Union. In this context, the meaning of citizenship based on individual rights and duties was intrinsically linked to membership of the EU. In the words of Ramos (2003) “to become a citizen was to become a European”. Thus, the new discourse of citizenship was intertwined with the perception of a new wider space of membership in which a new status, new entitlements and guarantees benefited and strengthened Portuguese citizens.

The other major outcome of Portugal’s joining the EU is directly related to Portuguese foreign policy strategy, which sought to promote national interests within a European framework. Portugal, like Spain, has championed a closer relationship between the EU and Latin America, believing that close co-operation constituted a comparative advantage which should not be overlooked. With regards to Africa, membership of the EU has not severed Portugal’s potential links with its former colonies: on the contrary, it has enhanced such relations (Vasconcelos, 1996). After almost two decades of resentment and tense relationships, Portugal by the 1990s was keen on establishing closer ties with African ex-colonies and with Brazil.

This had major implications for the adoption of policies which have tended to privilege Lusophone immigrants. The principle of equality of rights between nationals and foreigners is enshrined in the Portuguese constitution. However, article 3 of the constitution awards special rights to citizens of all Lusophone countries residing in Portugal: Brazilians were given yet more rights in 2001, as an elite within an elite. The institutionalisation of differential rights concerning these populations has provided concrete legal opportunities to Lusophone African citizens as well as to Brazilians.

With regard to the acquisition of Portuguese nationality, in 1994 important changes were introduced to the previous law 37/81. The new legislation (Decree-Law 253/94) further restricted general access to Portuguese nationality, making naturalisation even harder to obtain than it had been in the early days after decolonisation. For instance, residence requirements for nationality acquisition were extended from a minimum of six to ten years. The exception was for Lusophone citizens. For these, a six year period of legal residence remained unchanged.

It is important to note that in this new formulation, cultural requirements became highly significant for the acquisition of Portuguese nationality. Applicants were required to show the existence of effective cultural links (of language, customs or values) with the Portuguese national community. Lusophone migrants are clearly in a privileged situation compared to non-Lusophone populations in fulfilling the required cultural criteria for naturalisation. It is interesting to note that the idea of "national community" is understood as a community of Portuguese citizens, independent of their place of residence, who have a *modus vivendi* which is deeply related to Portuguese norms. As in the Law of 1981, the idea of a nation-state based not on geographical continuity but on culture as the "glue" that unites and incorporates disparate realities, was further enhanced by the new citizenship requirements. These constitute a further aspect of the deterritorialisation of Portuguese nationhood discussed earlier. The 1994 legislation was later amended so that whereas citizens of Portuguese-speaking countries could apply for long-term residence status after a five year period, non-EU foreigners were eligible only after 8 years of residence.

In addition, the implementation of several regularisation processes targeting undocumented migrants, as well as the promulgation of special regularisation legislation aimed at Brazilian nationals, mostly benefited migrant populations from Portuguese-speaking countries. Of no less importance has been the considerable number of labour agreements made between Portugal and Portuguese-speaking countries. Recruitment of temporary workers from Lusophone-African countries, especially from Cape Verde, has been favoured.

In sum, legislative measures introduced from the second half of the 1990s onwards have tended to privilege migrants from Lusophone countries, sometimes through specific bilateral agreements between governments, but also through more general Portuguese government action. For example, in respect of political rights, in 1996, voting in local elections was extended to EU nationals and to the citizens of Portuguese-speaking countries with which Portugal has established bilateral protocols. More recently, a new law of nationality (Organic Law 2/2006) was approved by Parliament in February 2006. This law changes the rules of assignment of nationality, reinforcing *ius soli*, while extending nationality rights to second- and third-generation immigrants. The new legislation rests on a more

inclusive approach to nationality, conferring full citizenship upon thousands of immigrants, mainly from the PALOPs (Portuguese-speaking African countries), a substantial number of whom were born in Portugal. Also, easier access to the acquisition of nationality is extended to second-generation Portuguese emigrants living abroad.

A further important dimension to Portuguese post-colonial citizenship policies has to do with the official thrust towards the creation of a wider Lusophone community. In 1986 with the entrance of Portugal into the European Union, the social democratic government led by Cavaco Silva assumed a more active role in establishing closer relations with Portuguese-speaking African countries and with Brazil. Portugal sought to enhance its image as a privileged gateway for Africa as well as for parts of Latin America, thereby strengthening its position within the European context. Despite political willingness to create a new Portuguese-speaking cultural and political space, the process dragged on and the formalisation of the Community of Portuguese Language Countries (*Comunidade de Países de Língua Portuguesa*, CPLP), was to become a reality only in 1996.

The CPLP has been the centre of much controversy. For some, the constitution of this community provided a new political space for debating immigration issues, identity and citizenship rights. Its main objectives were the construction of a transnational Lusophone identity and the creation of a “Lusophone citizenship” grounded on extended rights for nationals of Portuguese-speaking countries (Aguiar, 1998; Jesus, 1998; Leitão, 1998). The development of a Lusophone space of membership appeals to an expanded notion of citizenship based on “interculturalism which calls for the right to share a territory and also the obligation to live according to the culture of various groups and communities without subordinating their ways of living to those of the majority” (Rocha-Trindade, 1998: 12). For the former Portuguese Government’s High Commissioner for Immigration and Ethnic Minorities, José Leitão, Lusophone citizenship did not conflict with Portuguese obligations within the EU. On the contrary, it is perceived as being of utmost importance in a “world increasingly shaped by regional integration and economic, social and cultural processes of globalisation” (Leitão, 1998: 59).

For others, the CPLP amounts to little more than a re-packaged version of the Luso-tropicalist dream, embodying representations of a predominantly white Brazilian community while at the same time creating a symbolic space of sustenance for Portuguese imagined national identity. For Lopes, paraphrasing Villaverde Cabral, this community based on a common language is essentially “a new rhetorical expediency along the lines of luso-tropicalism or perhaps a plausible area of institutional co-operation” (cited in Lopes, 1999: 32). In another sense, it could be interpreted as a re-creation of the Portuguese overseas Empire, since it reflects some of the discourses of the late colonial period discussed earlier in

this paper. Ultimately, the CPLP is perceived as an imaginary community which emerged as a response to the loss of the empire and to the integration of Portugal into the EU (Lopes, 1999).

During the last five years, the debate has been centred on citizenship and the creation of a Lusophone citizen status (*Estatuto do Cidadão Lusófono*). This project proposes a notion of citizenship which would not only confer a set of rights to citizens of member states of the CPLP, but should also promote diversity, multiculturalism and respect for universal rights.

Discussion

A general feature of the argument in this paper is that to some extent discourses have moved in opposite directions in Portugal and the United Kingdom over the past 30 years. Regulations and legislation have followed suit. On the other hand, at the point when decolonisation occurred, there were certain strong similarities between the regimes operated by the two colonial powers.

In the years immediately leading up to decolonisation (or up to 1962 in the case of the United Kingdom), the legal status of residents of the colonies was tied to the status of citizens of the metropolis. In the United Kingdom, the operational legislation dated from 1914 and 1948, establishing equality of subjects across the whole British Empire and its successor the British Commonwealth. Portugal had, for an extended period, categorised its colonial subjects into a well-defined status hierarchy that, whilst not explicitly racialised at the time, nevertheless can be interpreted in that way from today's perspective. However, the legislation of 1961, framed in the context of Luso-tropicalism, established an equality of citizenship across the Portuguese Empire that in many ways matched that applying within the British Commonwealth – even though the representation of the integral nature of the wider Portuguese polity differed markedly from the perceived relationship between the British metropolis and its overseas affiliates and possessions.

The earlier Portuguese hierarchisation of its colonial peoples was not, however, wholly absent in Britain. Whilst all people born within the UK or its possessions were seen, under the Imperial Act of 1914, as British subjects without any differentiation (before the law) on ethnic or cultural grounds, nevertheless there was undoubtedly racialised thinking at work within the organisation of the British Empire, even if it operated through regulation rather than statute.

Portuguese and British official discourses about “Empires” in relation to the core metropolis clearly differed. Portugal came to define its empire as a series of overseas provinces on a par in certain respects with Portugal itself. To British eyes, the British Empire was distinct from Britain itself, with a further division between

the largely white dominions and the largely non-white colonies (with India regarded as a noteworthy exception).

At the point of decolonisation, reactions in Lisbon and London were diametrically opposed. Lisbon cut off its former colonial subjects from all substantive rights as Portuguese citizens, unless they had been resident in Portugal itself for a significant period. At least until 1962, the rights of former subjects of newly-independent ex-British colonies changed little at independence.

The period since decolonisation has produced shifts in opposite directions from these two earlier positions. In overall terms, the position of Portugal has moved towards the recognition of greater rights of access to the country, and of citizenship rights within it, to those (predominantly from the recent colonies but also from the long-lost imperial realm of Brazil) who come from a Portuguese-speaking country.

In contrast, the early years of the United Kingdom's relations with ex-colonial populations (during the 1950s after the independence and partition of India) saw the maintenance of open policies on access to the UK and citizenship within it. Progressively, from the 1962 Commonwealth Immigrants Act onwards, issues of access to the UK for those born in former colonies have been significantly restricted. A racialised element briefly entered the legislative landscape through the introduction of issues of patriality (favouring those with an ancestral White British background). Nevertheless, in an important distinction between immigration policy and policy towards immigrants, the UK, although restrictive on immigration from the ex-colonies, has continued to provide favourable status for them once they have arrived in the ex-metropolis - for example in terms of voting rights and eligibility for jury service.

However, the element of patriality has taken on more permanent significance in Portugal in as much as those born outside the Portuguese-speaking world who can demonstrate an ancestor within the previous three generations who was a Portuguese citizen have up to now been able to access citizenship. Yet, more recently, a change in nationality laws has accentuated the significance of the element of *ius soli* in the new more open and inclusive citizenship regime.

Both Portugal and the UK have been the source of major diasporic flows of emigrants for over a century. Nevertheless, whilst Portugal has in the last twenty years taken specific steps to reconnect emigrant communities with the "homeland", for example through rights of access, this only occurred significantly in the United Kingdom during the brief window between the 1971 and the 1981 nationality acts, although with some lingering clauses still applying. Britain has never seen itself as at the heart of a wider English-speaking world in the way that

Portugal has within Lusophonia. British immigration and citizenship policies have thus not been determined by such cultural constructs in the way that those of Portugal have.

This paper has shown a number of differences in the decolonisation process in the two countries, stretching over an extended period. Were analysis extended to other European ex-colonial powers, such as France and the Netherlands, further elements of national distinction would be shown. In sum, decolonisation is not just an event but becomes a structural feature of society, entailing a constant dialogue for decades. In both countries considered here, the colonial past and the process of decolonisation have influenced discourses, policies and practices concerning migration, citizenship and the identification of “otherness”. Of significance are also the economic and the political dimensions of global networks that intersect with ex-colonial and cultural spaces. These are complex and inter-related issues which, ultimately, influence and structure thinking about the “other” and about post-colonial citizenship in multicultural democratic societies.

Notes

¹ The authors wish to acknowledge the financial support of the Treaty of Windsor Funds (administered by the British Council and the Portuguese Committee of University Deans) for the research in this paper. They also wish to acknowledge Tom Shaw who acted as research assistant for the latter period of the composition of the paper.

² See Figueiredo (1975, 2003) for pithy and challenging analyses of Portuguese colonial rule.

³ By 1950, the total number of *assimilados* in Angola and Mozambique was 30,000 and 4,300, respectively. These low numbers reflected the lack of interest of the population in being registered as *assimilados* given that, in practice, they had no political rights.

⁴ On Gilberto Freyre’s writings on luso-tropicalism and on Portuguese colonial rule, see the interesting work of Claudia Castelo (1998). Freyre’s luso-tropicalist paradigm had a political and academic impact in Portugal; to cite a few examples, see the works of Adriano Moreira, 1960; Orlando Ribeiro, 1962 and Jorge Dias, 1965.

References

- Aguiar, M. (1998), “Comunidades Lusófonas. Migrações e Cidadania”, in Rocha-Trindade, M.B. (org.) *Interculturalismo e Cidadania em Espaços Lusófonos*, Lisbon: Publicações Europa-América.
- Aguiar, M. (1999), *Portugal. O País das Migrações sem Fim*, Lisbon: Cartográfica.
- Aldrich, R. and Connell, J. (1998), *The Last Colonies*, Cambridge: Cambridge University Press.
- Brubaker, R. (1992), *Citizenship and Nationhood in France and Germany*, Cambridge Mass.: Harvard University Press.
- Castelo, C. (1999), “*O Modo Português de Estar no Mundo*” – *O Luso-tropicalismo e a ideologia colonial portuguesa*, Porto: Edições Afrontamento.
- Ciment, J. (1997), *Angola and Mozambique: Post-Colonial Wars in Southern Africa*, New York: Facts on File.

- Cross, M. and Entzinger, H. (1988), *Lost Illusions: Caribbean Minorities in Britain and the Netherlands*, London: Tavistock.
- Darwin, J. (1988), *Britain and Decolonisation: The Retreat from Empire in the Post-War World*, London: Macmillan.
- Dias, A.J. (1965), "Contribuição para o estudo da questão racial e da miscigenação", *Boletim da Sociedade de Geografia de Lisboa*, Lisbon, January-June, pp. 60-72.
- Dirks, N. (2001), *Castes of Mind: Colonialism and the Making of Modern India*, Princeton NJ: Princeton University Press.
- Esteves, M.C. (1991), "Portugal, País de Imigração", *Cadernos IED*, Vol. 22, Lisbon: IED-Instituto de Estudos para o Desenvolvimento.
- Figueiredo, A. (1975), *Portugal: Fifty Years of Dictatorship*, Harmondsworth: Penguin.
- Figueiredo, A. (2003), "The Empire is dead, long live the EU", in Lloyd-Jones, S. and Costa Pinto, A. (orgs.) *The Last Empire: Thirty-Years of Portuguese Decolonization*, Bristol: Intellect Books, pp.127-144.
- Hansen, R. (2000), *Citizenship and Immigration in Post-war Britain: The Institutional Origins of a Multicultural Nation*, Oxford: OUP.
- Jesus, J. L. (1998), "Direitos de Cidadania no Espaço Lusófono" in Rocha-Trindade, M.B. (org.) *Interculturalismo e Cidadania em Espaços Lusófonos*, Lisbon: Publicações Europa-América.
- João, M.I. (1989), "Ideologia e políticas coloniais na segunda metade do século XIX", *Portugal no Mundo*, Vol. 112-113, Lisbon: Publicações Alfa.
- Leitão, J. (1998), "Génese e Dinâmica da Cidadania Lusófona" in Rocha-Trindade, M.B. (org.), *Interculturalismo e Cidadania em Espaços Lusófonos*, Lisbon: Publicações Europa-América.
- Lopes, P. (1999), *Portugal: Holograma da Mobilidade Humana*, Lisbon: Editora Rei dos Livros.
- Machado, F. L. (1997), "Contornos e especificidades da imigração em Portugal", *Sociologia – Problemas e Práticas*, nº 16, pp.123-136.
- MacQueen, N. (1997), *The Decolonization of Portuguese Africa: Metropolitan Revolution and the Dissolution of Empire*, London and New York: Longman.
- Mattoso, J. (org.) (1997), *História de Portugal*, Volumes V, VII, VIII, Lisbon: Editorial Estampa.
- Moreira, A. (1960), "A unidade política e o estatuto das populações", *Boletim Geral do Ultramar*, nº 417, pp.101-120.
- Oliveira Marques, A.H. (1998), *História de Portugal*. Volume III, Lisbon: Editorial Presença.
- Pires, R.P. (org.) (1987), "Os Retornados, um estudo sociográfico", *Cadernos IED*, n.º 14, Lisbon: IED.
- Ramos, R. (2003), "Citizenship in Portugal" (working paper) (available at www.oplorc.org.uk/essays/citizenship.polf)
- Rocha-Trindade, M.B. (1995), *Sociologia das Migrações*, Lisbon: Universidade Aberta.

- Ribeiro, O. (1962), *Aspectos e Problemas da Expansão Portuguesa*, Col. ECPS, n.º 59. Lisbon: JIU.
- Santos, B. S. (1994), *Pela Mão de Alice – O Social e o Político na Pós-Modernidade*. Porto: Edições Afrontamento.
- Spencer, I. (1997), *British Immigration Policy since 1939*, London: Routledge.
- Vasconcelos, A. (2004), "Integração aberta e cidadania", *Estratégia*, n.º 20, pp.169-180.
- Walmsley, A. (1998), "British Policy on Nationality", in O'Leary, S. and Tiilikainen, T. (orgs.) *Citizenship and Nationality Status in the New Europe*, London, IPPR.