



Migrant Citizenship and Second-Class Citizenship: Comparative History

FIXNZ DATA & TRUTH

English Edition

Published	June 2026
Version	1.0
Publisher	FIXNZ
Website	www.fixnz.org

DISCLAIMER

This publication is an independent historical and policy discussion document prepared solely for public-interest debate. It is not legal, immigration, citizenship, constitutional, religious or other professional advice. Historical terminology may reflect discriminatory systems and is used only to explain past institutions. Every material claim should be checked against primary legislation, judgments, archival records and authoritative scholarship before quotation or republication. FIXNZ does not allege unlawful conduct or improper motive by any identifiable living person. References to ethnic, national, religious or migrant groups describe historical or institutional patterns and must not be used to judge individuals. Views are those of FIXNZ and do not represent any government, court, religious body, community or cited organisation. Citation does not imply endorsement. To the fullest extent permitted by law, FIXNZ disclaims liability for loss arising from reliance on this publication; nothing in this disclaimer excludes responsibility that cannot lawfully be excluded.

Executive Summary

Citizenship has never been a simple yes-or-no status. Across history, states have created layers of belonging: citizens, subjects, protected minorities, denizens, colonial subjects, permanent residents and stateless people. The language of 'second-class citizenship' emerged to describe the gap between nominal membership and unequal rights.

This report compares first-generation migrant citizenship, religious hierarchy, forced assimilation, denaturalisation, expulsion and de facto inequality. Its central warning is that claims of non-integration have repeatedly been used to justify collective punishment.

Core conclusion: equal legal status can be weakened by unequal political rights, exclusion from public life, insecure residence or systematic discrimination.

1. From Subjecthood to Citizenship

Modern citizenship developed from older systems of allegiance. In monarchies and empires, people were often subjects rather than equal citizens. Foreigners could receive limited protection without full political membership.

- Ancient Athens distinguished citizens from resident foreigners known as metics.
- Roman law gradually expanded citizenship but still maintained graded legal statuses.
- Medieval Europe used royal grants, local privileges and denization to admit selected outsiders.
- Modern naturalisation introduced clearer statutory procedures, but states retained broad discretion.

The transition from personal allegiance to equal citizenship was gradual and incomplete. Property, sex, religion, race and birthplace continued to affect political membership long after citizenship laws became formalised.

2. First-Generation Migrants and the Problem of Loyalty

First-generation migrants have historically been viewed through three competing lenses: useful contributors, culturally distinct outsiders and potential security risks.

- States often demanded residence, oaths of allegiance and proof of good character.
- Access to political office, land ownership or voting could remain restricted after naturalisation.
- War and nationalism made dual loyalty a recurring suspicion.
- Economic success could provoke accusations of disloyalty or non-assimilation.

Modern democratic systems generally reject inherited civic inferiority, but naturalised citizens may still face doubts that native-born citizens do not.

3. Religion and Graded Citizenship

3.1 Dhimmi Status in Historical Muslim States

In several historical Islamic polities, recognised non-Muslim communities could receive protection and limited autonomy under dhimmi status.

- Christians and Jews could often maintain worship and communal institutions.
- They paid special taxes and were subject to legal and social restrictions.
- They were protected subjects rather than political equals of Muslims.

The system varied across time and place, but it demonstrates how religious toleration can coexist with formal hierarchy.

3.2 Religious Minorities in Christian Europe

Christian European states also imposed long periods of legal inequality on religious minorities.

- Jewish communities were frequently excluded from landholding, guilds, public office and unrestricted residence.
- Distinctive clothing, segregated quarters and special taxes were used in some jurisdictions.
- Jewish emancipation expanded after the French Revolution and across Europe during the nineteenth century.

Religious equality was therefore not an original feature of European citizenship; it was won through political and legal reform.

3.3 Colonial Algeria and Differentiated Citizenship

The Crémieux Decree of 1870 granted French citizenship collectively to many Algerian Jews while most Muslim Algerians remained colonial subjects under a separate legal regime.

This policy demonstrates how empire could use religion and legal category to divide populations living in the same territory.

4. Assimilation, Suspicion and Collective Expulsion

4.1 The Moriscos of Spain

The Moriscos were descendants of Muslims compelled to convert to Christianity. Despite formal conversion, they remained objects of suspicion because of language, customs and alleged hidden religious practice.

- Authorities imposed cultural assimilation measures.
- Collective distrust linked cultural difference with political disloyalty.
- Between 1609 and 1614, roughly 300,000 Moriscos were expelled.

The case shows how forced assimilation can produce permanent suspicion rather than integration.

4.2 Lhotshampa Expulsion from Bhutan

In the late twentieth century, Bhutan adopted cultural and citizenship policies that disadvantaged Nepali-speaking Lhotshampa communities.

- Retrospective documentation requirements excluded many long-term residents.
- Cultural conformity was linked to national loyalty.
- Around 100,000 people were displaced or expelled, creating a prolonged refugee crisis.

The episode is widely treated as a case in which citizenship law and assimilation policy were used to remove an unwanted minority.

4.3 Asians Expelled from Uganda

In 1972, the Ugandan regime ordered the expulsion of tens of thousands of people of South Asian origin.

- Economic success was portrayed as evidence of disloyalty and separation.
- Businesses and property were confiscated.
- Citizenship and lawful residence did not provide reliable protection.

The policy severely damaged Uganda's economy and demonstrates how populist nationalism can turn commercial minorities into targets.

4.4 Rohingya Statelessness in Myanmar

Myanmar's 1982 citizenship framework excluded the Rohingya from recognised national ethnic categories and left many without effective citizenship.

- Restrictions affected movement, education, employment and family life.
- Official narratives portrayed a long-settled population as recent foreigners.
- Military campaigns later forced hundreds of thousands to flee.

The Rohingya case illustrates the extreme danger of allowing the state to redefine belonging through ancestry lists and contested historical cut-off dates.

5. When 'Failure to Integrate' Becomes a Political Weapon

Integration is a legitimate public concern, but the concept is easily manipulated.

- Language learning, civic participation and compliance with law can reasonably be expected.
- Cultural difference is not the same as disloyalty.
- Collective punishment assumes guilt by group identity.
- Governments can use integration rhetoric to disguise confiscation, exclusion or ethnic cleansing.

A lawful democratic state should assess individual conduct rather than declare entire communities unfit for membership.

6. The Meaning of 'Second-Class Citizen'

'Second-class citizen' is not generally a formal legal category. It is a political and analytical term describing people who possess nominal membership but lack equal rights, opportunities or protection.

Dimension	Formal equality	Second-class condition
Voting	Right exists in law	Registration barriers, intimidation or unequal vote weight
Public office	Eligibility in principle	Religious, ethnic or social exclusion in practice
Movement	Citizenship passport or residence	Internal permits, segregation or arbitrary restrictions
Justice	Equal legal protection	Disproportionate policing, detention or sentencing
Employment	No formal bar	Systematic exclusion from professions or institutions
Identity	Recognised nationality	Persistent treatment as foreign or disloyal

7. Historical Forms of Second-Class Citizenship

- Jim Crow segregation in the United States denied African Americans effective equality despite constitutional citizenship.
- Nazi Germany's Nuremberg Laws stripped Jews of full political membership.
- Apartheid South Africa imposed explicit racial hierarchy in residence, employment and political rights.
- Colonial empires distinguished metropolitan citizens from colonial subjects.
- Women in many democracies remained politically subordinate before equal suffrage.

These systems show that citizenship documents alone do not guarantee equal membership.

8. Modern De Facto Inequality

After the Second World War, explicit legal hierarchies became less acceptable. Inequality increasingly persisted through administration, economics and social institutions.

- Minorities may experience unequal policing or employment despite formally equal law.
- Long-term residents may pay taxes yet lack national voting rights.
- Naturalised citizens may face denaturalisation powers not applicable to citizens by birth.
- Stateless residents can live for generations without secure political membership.
- Disabled people may possess formal rights but lack practical access to transport, buildings or public services.

The modern meaning of second-class citizenship therefore includes both legal inferiority and persistent institutional exclusion.

9. Citizenship Revocation and Unequal Security

Some states allow citizenship obtained by naturalisation to be revoked for fraud, terrorism or disloyalty, while birth citizenship is more secure.

- Revocation can create two levels of citizenship if only dual nationals or naturalised citizens are exposed.
- International law discourages arbitrary statelessness.
- The more broadly 'disloyalty' is defined, the greater the risk of political abuse.

A democratic system should use criminal law for individual wrongdoing and reserve denaturalisation for narrow, clearly proven circumstances.

10. Comparative Lessons

Case	Official justification	Actual mechanism	Lesson
Moriscos, Spain	Religious insincerity and non-assimilation	Forced cultural conformity followed by expulsion	Coercive assimilation can prepare the ground for removal
Lhotshampa, Bhutan	Nationality verification and cultural unity	Retrospective documentation and denationalisation	Citizenship paperwork can become an exclusion tool
South Asians, Uganda	Economic nationalism and alleged disloyalty	Expulsion and confiscation	Commercial minorities are vulnerable during populist crisis
Rohingya, Myanmar	Ancestry-based national membership	Exclusion from recognised ethnic categories	Ethnic citizenship laws can produce mass statelessness
Jim Crow, United States	State sovereignty and social order	Segregation and voter suppression	Formal citizenship can coexist with practical exclusion

11. Principles for Democratic Citizenship

- Citizenship should not be graded by race, religion, ancestry or wealth.
- Naturalised citizens should enjoy security broadly comparable to citizens by birth.
- Integration requirements should be clear, prospective and individually assessed.
- No group should lose rights because of collective suspicion.
- Cultural difference should be distinguished from unlawful conduct.
- Revocation and deportation powers require due process and independent review.
- Long-term lawful residence should create a realistic path to secure membership.
- Public institutions should measure whether formal rights are effective in practice.

FIXNZ principle: the test of citizenship is not only whether a person possesses a passport, but whether the state protects that person's rights on equal terms.

Conclusion

History shows that migrants and minorities have repeatedly been admitted into states without being accepted as political equals. Religion, ancestry, property and claims of non-integration have all been used to justify inferior status.

The concept of second-class citizenship remains useful because it identifies the gap between formal membership and lived equality. A democratic society should therefore protect not only access to citizenship, but the security and substance of citizenship after it is granted.

References and Source Notes

1. Historical scholarship on citizenship in Athens, Rome and medieval Europe.
2. Research on denization, naturalisation and the emergence of modern nationality law.
3. Studies of dhimmi status and religious minorities in Islamic history.
4. European Jewish emancipation and the Crémieux Decree.
5. Historical research on the Moriscos and their expulsion from Spain.
6. United Nations and scholarly material on the Lhotshampa refugee crisis.
7. Historical and economic studies of the 1972 expulsion of Asians from Uganda.
8. United Nations and human-rights reporting on Rohingya statelessness and displacement.
9. Civil-rights scholarship on Jim Crow, apartheid and second-class citizenship.
10. International law concerning nationality, statelessness and arbitrary deprivation of citizenship.
11. The Chinese-language source edition from which this English publication was translated and editorially reconstructed.

Editorial Note

This English edition preserves the source report's comparative historical scope while clarifying terminology and avoiding collective blame. Historical examples are presented to analyse institutions, not to judge modern ethnic or religious communities. No identifiable living person is accused of misconduct. Time-sensitive citizenship and nationality law should be checked against current primary sources before republication.