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Forms of Activism on Refugee Protection in a British Overseas Territory: conventional, contentious, cultural

Olga Demetriou

THE LONDON SCHOOL OF ECONOMICS AND POLITICAL SCIENCE

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Olga Demetriou

University of Durham

ABSTRACT

This paper begins from the premise that refugee protection is a field of contestation between practices that co-determine what is a proper refugee and what is a proper state. It locates this contestation in three forms of activism explored in turn: conventional, contentious, and cultural. It takes the example of refugees stranded on the British Bases in Cyprus as a micro-case of how these different forms of politics results in institutional and non-institutional practices that shape perceptions of the state. The paper analyses how these forms of activism evolved over a span of two decades, how they interacted with each other, and what their outcomes were. In this specific case, the contestation over protection responsibilities resulted in a court ruling that question the sovereign status of the British bases in Cyprus. Taking this as an instantiation of the risks that skirting responsibilities poses for states, the paper advances the claim that refugees can in fact define states as much as states define refugees. In a broader perspective, refugee protection is a measure of the extent to which states are democratic, just, or otherwise, actors in the international system.

Keywords

Refugee mobilization; Cyprus British bases; conventional / contentious / cultural activism; Refugee Convention application; migration diplomacy

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Abbreviations

BDT	British Dependent Territory
BIOT	British Indian Ocean Territory
BOT	British Overseas Territory
CNA	Cyprus News Agency
ECHR	European Convention on Human Rights
ECtHR	European Court of Human Rights
FCO	Foreign and Commonwealth Office (UK)
ICJ	International Court of Justice
IOM	International Organisation for Migration (UN)
MoD	Ministry of Defence (UK)
MoU	Memorandum of Understanding
RoC	Republic of Cyprus
SBA	Sovereign Base Area (UK in Cyprus)
SBAA	Sovereign Base Area Administration (UK in Cyprus)
UNHCR	United Nations High Commissioner for Refugees

1. Refugees defining States: Locating Activism in the Politics of Refugee Protection

In 2011, a British court in Cyprus considering the fate of refugees on the island's British bases posed the question of whether it could be assumed that the Refugee Convention of 1951 applied to these areas or not (Bashir vs. MoD, 2011). As the case progressed, the question continued to be posed and receive equivocal answers. In 2017, a UK court additionally asked whether, if the Refugee Convention did indeed apply to the British Sovereign Base Areas on Cyprus, the bases had appropriate infrastructures to accommodate the needs of the refugees (Bashir and others v. Home Office, 2017). The question of refugeehood was being flipped from being one about people (are they refugees?) to one about the state (is this a state that protects refugees?)

This paper adopts this flipped perspective. What can refugee protection tell us about the states that mete it out? In analyses of the coup in Myanmar, references to earlier persecution of the Rohingya, which rendered them refugees in Bangladesh loom large (Diamond, 2021; Prasse-Freeman and Kabya, 2021). The detention of children, the building of the wall on the US-Mexico border, and the Muslim ban, have constituted major points in the delegitimization of the Trump administration and critique of the change that Biden represented (Bartlett, 2021; Keck and Clua-Losada, 2021; Kocher, 2021). Hungary's 2018 restrictions to asylum rights, criticised at the ECJ in 2020, are indicative of the country's deteriorating levels of democracy (Bradford and Cullen, 2021; Biro-Nagy, 2021). And indications of restrictive policies with respect to Afghan refugees following the US' withdrawal from the country in 2021 have prompted assessments of the European Union's ability to uphold democratic principles.[1] UK plans to overhaul the refugee protection system in the interests of stopping migrants has prompted wide public debate, embroiling, earlier this year, public figures such as Gary Lineker,[2] over the government's feared sliding into authoritarian policies. And as these lines are being

[1] https://euobserver.com/opinion/152704
[2] https://www.politico.eu/article/gary-lineker-chose-to-cut-against-the-grain-of-power-good-law-project-social-media-guidelines-northern-ireland-british-government-immigration-clampdown-free-speech-rights-tim-davie/

written, the devastating shipwreck off the coast of the Peloponnese on 13 June 2023, feared to have killed around 650 people, is prompting questions, domestically and internationally, about the Greek and European border regimes. These examples are indicative of the significance of questions of refugee protection in critical assessments of state practices. At the same time, they show the critical role that various forms of activism play in bringing about those assessments and making them effective. This paper addresses these two issues.

This paper starts from the premise that refugees define states just as states define refugees. This relationship can be both legal and political, where laws, directives, policies, courts, etc. offer the apparatuses for establishing these connections and calibrating levels of protection against levels of democracy. It is also social, because it is through the efforts of societal actors that such calibration is mediated and gains force by exerting public and political pressure. This, it could be argued, is precisely what is at stake in many parts of the globe at the present moment, where grand shifts in the migration regime are being implemented, sometimes in concert between states, and sometimes not, in an environment where political polarisation is growing and where these shifts are becoming a focal point of contestation.

Institutionally, we have seen, over the last decade, three grand shifts that underpin the shifts in the politics of migration that become manifested in domestic debates and contestations. These shifts inhere in changes to the apparatuses of refugee protection that have prompted critique from scholars of law and beyond:

(i) The introduction of global agreements regulating migration and asylum management (the Global Compacts on Migration and Refugees) that work in tandem (but some fear against) the Refugee Convention

(ii) The expanded mandate of the International Organisation of Migration (IOM) into areas of refugee protection management hitherto under the mandate of UNHCR

(iii) The fragmentation of statuses of protection into multiple categories applied by regional and national bodies rather than through international law in

the form of the Refugee Convention.[3]

These shifts indicate that the management of refugee protection is not a question of sovereign state decisions exclusively, but instead it is a field of contestation at a global level. In other words, if refugees define states, they do so in a context of international relations with other states. This point is poignantly made by the increasing scholarly attention to migration diplomacy (Greenhill, 2010; Adamson and Greenhill, 2022; Adamson and Tsourapas, 2020). This literature is also showing how internal political dynamics can drive such diplomacy in counter-productive ways (Greenhill, 2023). The dynamics of activism around migration and refugee protection in fact operate on multiple planes, in local, trans-local, and international levels, take many forms, and have multiple effects (Della Porta, 2018). Understanding these operations is important in elucidating the complex interactional dynamics in which migration politics unfolds.

This is the task I undertake in this paper, through close examination of a legal the case of the refugees stranded on the British bases in Cyprus with which the paper opened. Through this largely unknown case, pro-refugee activism came to redefine the status of the UK's Sovereign Base Areas (SBAs) in Cyprus and their relation to both Cyprus and the UK. This close examination of a singular legal case allows a deeper analysis of the possibilities of legal activism to question state sovereignty than larger scale examinations of mobilization processes might. It also shows the need to examine such activism not as a closed system but in conjunction with other forms of activism that took shape around it. Two very relevant forms that played a role in the development of the case were contentious activism and cultural activism. By taking a perspective that is on the one hand contained on the micro-level of a small community and few activist actors who achieved modest results, I am able to take an in-depth perspective that examines the unfolding of micro-dynamics in the long-term and over a period of two decades.

Indeed, relevant literature in this field is increasingly calling for expanded perspectives on the scale and scope of analyses of mobilization (Della Porta and Tarrow,

[3] I have elaborated on this point elsewhere (Demetriou, 2022).

2005; Della Porta and Diani, 2015) and the interactions between mobilization actors, state institutions, and the ways these interactions mediate wider political processes (Ellinas, 2020; 2022), especially in the field of migration (Steinhilper, 2018; Farnandez-Pessa, 2019; Castelli Gattinara and Zamponi, 2020; Perolini, 2022). I take the legal case as an example where a number of actors have mobilised to mediate the relationship between law and politics. In this mediation, legal advocates who often take on activist roles are key actors but there are also others around them—media, humanitarians, the public, and not least, the litigants. The paper explores this role as it examines the development of the legal case at the centre of the study. The three forms of activism are understood as follows:

- The first, conventional activism, explores the development of the legal case, which employed largely institutional means as it progressed through courts in Cyprus and England. In categorising this as conventional activism, I point attention to the use of the court system, the compliance with timeframes and procedures that are institutionally scripted, and the conformity to the outcomes that these processes lead to.
- The second, contentious activism, explores the various kinds of action that were undertaken by litigants and others as the case evolved, but which also preceded and succeeded the legal processes. These comprised actions such as protests, hunger strikes, and road closures.
- The third, cultural activism, explores the initiatives undertaken largely by activists in support of the case which consisted of actions aiming at an impact in the social and cultural spheres. In reporting on the effects of these forms of activism, the paper seeks to draw attention to aspects of mobilization that are often missed in macro-analyses of large-scale political events. It also points to the equivocal effects that such micro-political activisms have.

Methodologically, research on Richmond has encompassed participant observation during field visits to the village since 2018, informal interviews focussing on experiences

of the legal process with villagers, analysis of legal documents relating to the case, and media reports relating to Richmond. Additionally, I conducted participant observation and a number of in-depth interviews with the artist working in the village, focussing on her work in Richmond but also exploring other aspects of her work with refugees elsewhere in Cyprus (Demetriou, 2023). I also conducted interviews with Cypriot and British lawyers involved in the case.

2. Exception vs. Protection: The Case of Richmond Village

Critical studies on migration and refugee policy have pointed out that refugee protection is increasingly being approached not as an issue of substance, i.e. what the content of that protection should be, but as a question of management, i.e. who should be responsible for this protection (Boswell, 2003; Feller, 2006; Klepp, 2010; Scheel and Ratfisch, 2014; Zetter, 2015; Pecoud, 2018; Demetriou, 2022; Moretti, 2020). An important result of this shift is the externalisation of refugee protection to locations outside the EU but also locations at EU borders where regimes of exception can be applied (Ferrer-Gallardo, 2008; Papagianni, 2013; Andersson, 2016; Mountz, 2020). The Green Line in Cyprus and the more general condition of post-conflict that pertains on the island could be seen in these terms (Demetriou, 2018; Demetriou et al, 2023). The military bases that the UK maintains on the island are a particularly pertinent example of such exceptionalisation, which the Richmond case has put in question.

Richmond village is an area located in the Sovereign Base Area (SBA) of Dhekelia, on the east coast of Cyprus. There are two SBAs on Cyprus, Akrotiri and Dhekelia, and they are formally classified as British Overseas Territories (BOTs). They are both located on the southern shores of Cyprus, Dhekelia in the east near the town of Larnaca and Akrotiri in the centre outside of Limassol (Figure 1). Entry and exit is almost imperceptible, as there are no visible barriers aside from road signs when entering from Republic-controlled areas.

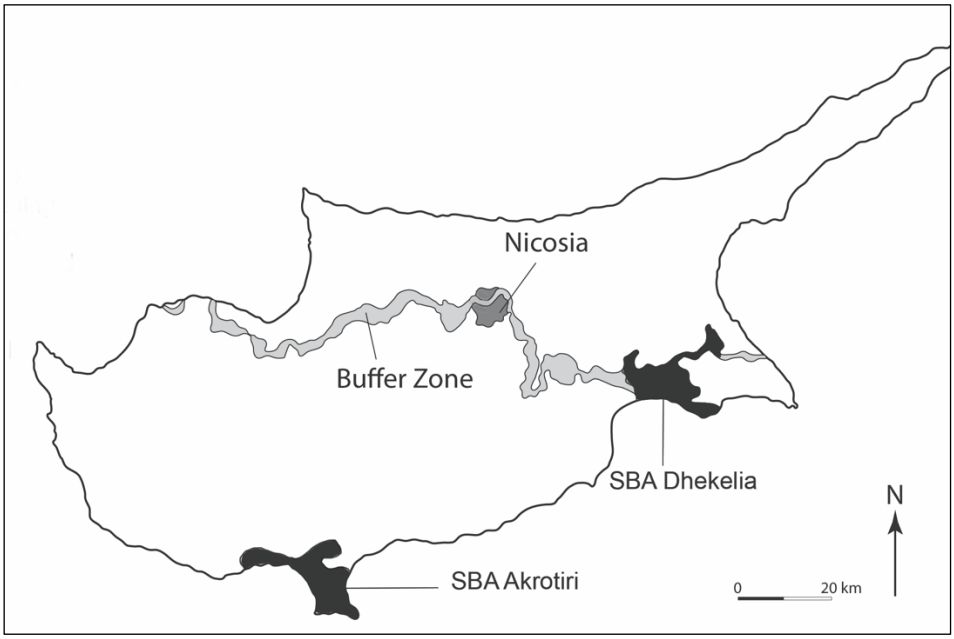

Figure 1: Map showing British bases in Cyprus, Akrotiri SBA to the south and Dhekelia to the east. [©Author]

During the period of violence that preceded the 1974 war, both bases had borders with Turkish-Cypriot enclaves and areas controlled by the Greek-Cypriots. Since the establishment of the UN Buffer Zone in 1974, Dhekelia borders areas controlled by the Republic, by the UN, and by the administration in the north (Figure 2). This geography is entangled with war and postconflict recovery. Turkish troops stopped at this border in 1974 partly because it was UK territory. One of the most publicised atrocities by the Turkish army, allegedly in revenge for earlier Greek-Cypriot-perpetrated massacres, took place in the village of Achna, just over the Dhekelia border. Refugees from this village and from other areas who had sheltered there took refuge in the base and established one of the largest camps in Achna forest in 1974, later settling, in part, in the village of Xylotymbou, which, together with the village of Ormidhia and an electricity plant on the coast, are demarcated as territories of the Republic of Cyprus within Dhekelia SBA. Enclaves within the enclave housing and rehabilitating refugees are part of the spatial and social infrastructure of the base (Figure 2).

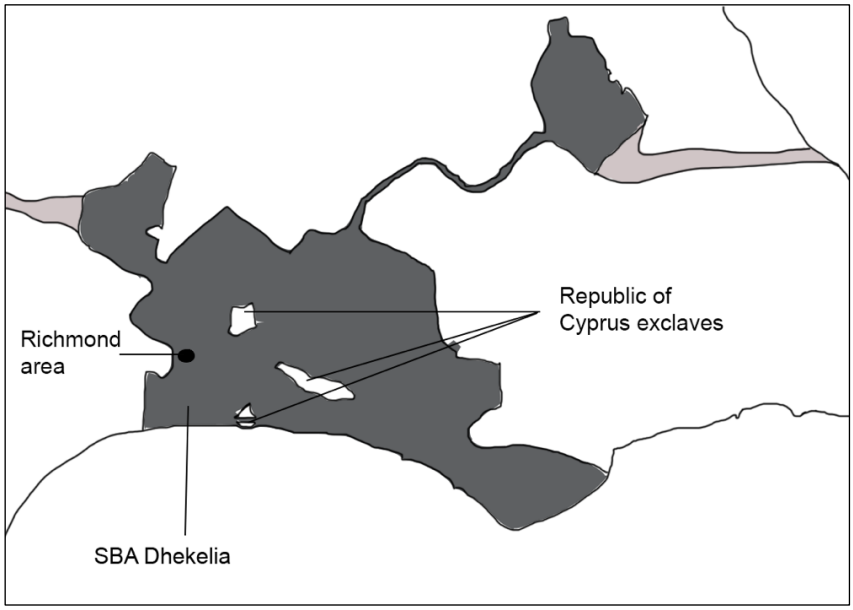

Figure 2 (left): Map showing jurisdictions around Dhekelia: British in dark grey, UN in lighter grey, Republic of Cyprus exclaves within Dhekelia uncoloured, RoC to the southeast and southwest of base areas, Turkish-Cypriot controlled areas to the north of the base and the UN line. [©Author]

Richmond village stretches over three short roads and comprised, until 2019, a dozen or so households accommodated in prefab housing units (Figure 3). In old site plans of Dhekelia (author's collection), Richmond is shown to consist of 23 units, and in its close vicinity it encompasses a swimming school, a school, and the antenna of the British Forces radio station, BFBS, as well as a diesel tank. The antenna is still visible, the school was closed and then destroyed in the time that the refugees were there (Figure 4), and traces of the swimming pool are long gone.

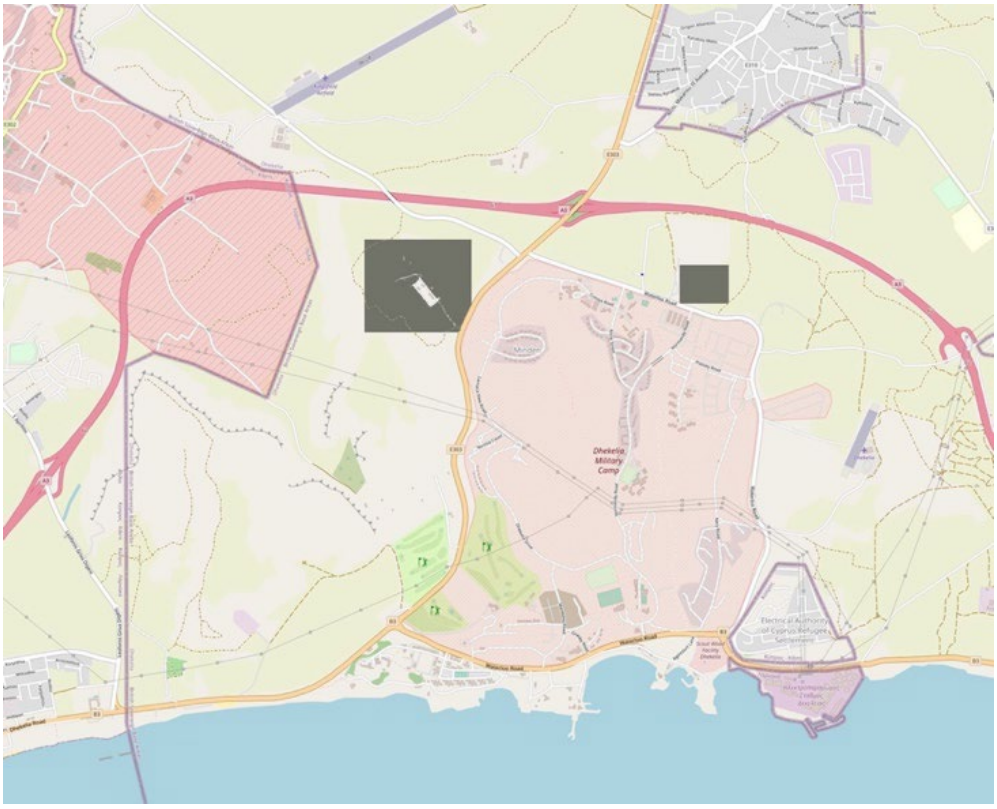

Figure 3: Richmond village (shaded box on the left) and Victoria Coach Park (shaded area on the right). Adapted from OpenStreetMap®, licensed under the Open Data Commons Open Database License [ODbL] by the OpenStreetMap Foundation [OSMF].

Figure 4: Ruins of the Richmond village school, 2019. [©Author]

Richmond has housed refugees from various countries, who arrived on a boat on Cyprus in 1998, and most of whom were recognised by SBA authorities. Court documents delivering judgements on the Richmond case,[4] state that in the afternoon of 8 October 1998 a boat arrived near the shores of Akrotiri base carrying 74 refugees, from Iraq, Syria, Ethiopia and Sudan, of whom 24 were children, 10 were women, and 40 were men. All of those arrivals were granted forms of protection and have been given accommodation on the SBAs since. UNHCR and the Home Office had contacted to assist in the assessment of their asylum application, as the SBA administration held that the Refugee Convention did not apply to the bases. At the time, it should be noted, UNHCR, having been stationed on the island since the 1960s to respond to internal displacement needs arising from the Cyprus conflict, was processing cases across the island, as the Republic of Cyprus had acceded to the Convention but did not pass a law on asylum until 2000.[5]

This was one of the first cases of asylum-seeking groups arriving in Cyprus. It was widely reported in the local media, eliciting public reactions of support, with people sending clothing and other emergency supplies. A few days later a second boat arrived, this time on the shores of the Republic of Cyprus (RoC); its passengers had their claims processed by UNHCR, and they were housed in a hotel in the nearby city. By the end of the month, the press was reporting the first case of police brutality against migrants, when the people from the second boat, who had not been recognised as refugees (and who in stark contrast to those who had been so recognised, were Africans), were beaten by officers at the police station where they were being held, after they resisted

[4] The documents from which I reconstruct the story are *Tag Eldin Ramadan Orsha in Bashir and others v. Administrator of the Sovereign Base Areas of Akrotiri and Dhekelia and Secretary of State for Defence* (2011); [2016] EWHC 954 (Admin), Case No: CO/879/2015, *R on the application of Tag Eldin Ramadan Bashir & others v. Secretary of State for the Home Department*; [2017] EWCA Civ 397, Case No: C4/2016/2334 and C4/2016/2403, *R (on the application of Tag Eldin Ramadan Bashir & Others) v. Secretary of State for the Home Department*; [2018] UKSC 45 Interim Judgment, *R (on the application of Tag Eldin Ramadan Bashir and others) (Respondents) v Secretary of State for the Home Department*. As far as facts are concerned, they exhibit little disagreement between them and work in a rather complementary relationship to one another. These texts are analysed in further detail in the next section.

[5] For background on the UNHCR's presence under a mandate for helping the internally displaced from Cyprus' own conflict since the 1960s and the passing of the asylum law by the Republic in 2000, see Demetriou (2018: 25-45, 145-166).

deportation (Demetriou et al, 2023).

The differing trajectories of the people on those two boats bespeaks, at first glance, of the differences between a state with a fully functioning asylum system and experience of refugee protection (the UK), and a state that lacks it (the Republic of Cyprus). It also speaks of the difference between, on the one hand, public and media reactions to the plight of castaways in a society that had not as yet begun to see itself as the transit and host country it would later become (Demetriou, 2021; Fischer, 2020a; 2020b; 2021; Trimikliniotis, 2018; 2019; Mainwaring, 2008) and on the other, the violence that a state as yet unaccustomed to the bureaucratic management of asylum and anti-racism metes out against black bodies. On that basis, it is important to see the Richmond case in the socio-political and administrative environment in which it arose and to evaluate it as a story of how asylum management develops, through fits and starts, from scratch.

Over the next few years, as both recognised refugees and rejected applicants were settled in disused personnel accommodation on the bade, some of the residents were joined by their families from their countries, others created families anew, some split. People made a home on the base (Figure 5). They had children on the base. Lawyers interviewed explained that some women had given birth at home, some at hospitals on the base or in nearby hospitals (on RoC soil). These contingencies would prove significant later on, conferring on Richmond residents a variety of statuses that for the most part did not seem to make a difference in villagers' daily lives – some were refugees, some were "failed asylum-seekers," some were stateless.

Figure 5: A garden in Richmond village, 2019. [©Author]

The legal case began when authorities of the base served eviction notices to the refugees in 2007, which prompted them to seek legal means to halt the evictions. However, the refugees had in fact been requesting transfer to the UK since 1999, giving rise to a long exchange of opinions amongst UK government departments, and embroiling UNHCR and the Republic of Cyprus (RoC) authorities in the process. In the first decade of their settlement, therefore, transfer to the UK was being requested through administrative means and through protests. It was when these means were exhausted and confrontation came to a head with the threat of eviction, that the struggle moved to the legal plane. From that point onwards, the case also attracted media interest as it progressed through the court. In this process, artists were also involved in supporting the refugees by highlighting their plight in their work.

A settlement with the families of the recognised refugees was reached in 2018 and they were relocated a year later, the rest of the residents still waiting on the base. Some of those who remained were later moved to prefab housing in another part of the base, a former bus station known as Victoria coach park (Figure 3).

As stated above, the progress of the case has attracted significant attention from a number of actors, both institutional and societal, national and international. This has

in turn mobilized various activist initiatives around the plight of Richmond refugees, litigants and non. The ways in which these processes combined, intersected, or diverged from each other holds significant lessons about the micro-dynamics of activism and its various manifestations around a single issue. The case has involved the authorities of the Republic and their responsibilities in protecting refugees, the UNHCR, which has made a number of interventions on behalf of the refugees, and other human rights activists in Cyprus and internationally. As the case progressed, media stories covered the plight of the refugees in Cyprus and the UK.[6] A photojournalist undertook a project there in 2009.[7] A Cypriot artist engaged with the community for years, documenting their daily practices and worries (Savvides, and Christodoulidou, 2021; Demetriou, 2023). An itinerant group of humanitarian jesters lent their support through staging children's activities during a protest some of the residents staged in the 2010s.

The varied initiatives and activities unfolding around this decade-long litigation are exemplary of the tactics and strategies that render law into a field of activism (Levitsky, 2006; Handmaker, 2011; Boutcher, 2013) and which mediate between different knowledges in transforming discourse into practice and vice versa. In the following sections, I describe the development of these three forms of activism.

[6] Indicatively, see the Guardian, Channel 4, Telegraph, Economist, Cyprus Mail, Euronews, and Sigma at, respectively, https://www.theguardian.com/world/2014/oct/21/refugee-families-marooned-raf-base-cyprus; https://www.channel4.com/news/refugees-living-on-british-military-base-in-cyprus-allowed-to-settle-in-uk; https://s.telegraph.co.uk/graphics/projects/British-base-Cyprus-limbo/index.html; https://www.economist.com/britain/2018/12/08/the-fate-of-six-refugee-families-hints-at-a-new-tone-on-immigration; https://cyprus-mail.com/2017/05/25/britain-acted-unlawfully-not-accepting-bases-refugees/; https://gr.euronews.com/2019/07/19/stin-uk-oi-protoi-prosfyges-meta-apo-20-xronia-diamonis-sti-vasi-dekeleias-kypros; https://www.sigmalive.com/news/local/579080/sto-inomeno-vasileio-oi-protoi-prosfyges-apo-ti-dekeleia.

[7] http://www.sarahmalian.com/Sarah_Malian_%7C_Documentary_Photography/Richmond_intro.html

3. Conventional Activism: Questioning Cyprus' Decolonisation

Conventional activism, in the sense of the legal process, is the most clearly effective form of the three in this case, since it resulted in the transfer of the litigants to Great Britain, which had been their claim all along. Alongside this success however, the following points need to be noted:

- Firstly, this "transfer", deliberately not labelled "resettlement" or "relocation" by the UK authorities (interview #1, practitioner, 16/7/2021) was agreed out of court, meaning that the case did not set a precedent.
- Secondly, the transfer concerned only the litigants of the case and their families, which meant that it excluded Richmond residents who were not recognised as refugees through the initial process in 1999.
- Thirdly, the most significant point arising from the case was the point that prefigured the question of resettlement: the political status of the SBAs.

On this last point, the court decided that the bases were in fact a colonial remnant, and not a new entity, as the UK government had originally claimed. Hence, the Refugee Convention was held to apply to the bases. It was in this sense that the refugees were able to redefine the state. In doing so, they, and their lawyers, exposed the risks that mechanisms for denying refugee protection pose for states as well, in this case, the utilisation of exceptional regimes of governance to skirt responsibilities of protection. The ramifications of this decision, which are the most significant outcome of the case are explored in this section. This enables a fuller understanding of the parameters through which conventional activism works.

To answer the question of whether the Refugee Convention applies to the bases, legal questions were posed about the extent to which BOT status in Cyprus resembles and diverges from norms established for other BOTs. Scholars have described the BOTs as an opaque system of rule, understood only by its governors. In 2012, Hintjens and Hodge found that "oversight was fragmented to such an extent that even FCO staff barely seemed aware of which Dependent Territory fell under which desk" (Hintjens and Hodge, 2012: 197). "In the past," they continue, detective work was required to

understand how the UK governed its Caribbean territories and this in part explains why much research has been done by former BDT Governors, who are also represented in Overseas Service Pensioners' Association. Together with Caribbean intellectuals, politicians and a few British bureaucrats, prior to 1998, these were almost the only people to fully understand how UK policies towards the then-Dependent Territories were formulated, implemented and received." (ibid, 206-7)

In the Richmond case, judgments question the extent to which this BOT is akin to others, as the UK authorities hold, most notably the British Indian Ocean Territory (BIOT). Alongside the history of Cyprus, we have a footnoted history of British decolonisations that highlight and obscure at once the exceptionalism that pertains in Cyprus. Chief among them is the discussion of Chagos, provided through the citing of the *Bancoult* case as a possible precedent (Snoxell, 2018; Frost and Murray, 2015; Fotherby, 2016). Lodged by the president of a Chagossian refugees' organisation, Olivier Bancoult (Vine, 2004; Jefferey, 2013), the case confirmed the responsibilities the UK had flouted towards the inhabitants of Chagos islands, when they rented the biggest of them, Diego Garcia, to the US to use as a military base at the height of the Cold War (Vine, 2011; Vine and Jeffery, 2009). Everyone was evicted from the surrounding Archipelago, and dispersed in Mauritius and the Seychelles (Jeffery, 2006). To do this, the UK had excised the islands from Mauritius in return for granting it independence and created a new entity – the BIOT (Minas, 2019). Chagossians won twice in the UK High Court (Jeffery 2013; Allen 2007), on the injustice of the evictions and initial settlement on an early law suit from 1982 (*Vencatessen* case) the rights to reparations and to return to Chagos (*Bancoult I* case), as well as to overturn exceptional legislation in the form of an Order in Council, passed in 2004 that had barred them from entering the islands (*Bancoult II* case). They unsuccessfully sued in the ECHR against the 'greenwashing' of the matter when the UK subsequently declared the Territory a Marine Protected Area (Kelloway, 2011), but finally also won at the ICJ when the excision decision was declared unlawful under decolonisation principles in 2019 (Allen, 2020) – a case for which Cyprus was one of a handful of nations to submit a comment in support of overturning the excision (Hadjigeorgiou, 2022).

These later international developments to the Chagos case ran parallel to the Richmond proceedings. But the Bancoult decisions that preceded them had already concluded by the time the High Court considered the Convention's applicability to the SBAs. And thus, the authorities reasoned, if in Chagos a new Constitution (which was passed on the creation of the BIOT), brought about a new entity and annulled the previous governing order, the SBAs, being another British Overseas Territory, should be held to exist in the same way. As the judges pore over the Bancoult case they find that that case established the principle that the creation of new political entities annulled treaties binding previous entities (2016: §196). But they question, as the refugees' lawyers argue, whether the SBAs are unlike the BIOT and more like the Turks and Caicos, separated from Jamaica before its independence (2016, §207-225) – a Territory where London had imposed direct rule in 2009 following a corruption scandal (Hintjens and Hodge, 2012). Academic analyses underscore the *suis generis* status of the SBAs, even by comparison to all other 13 BOTs, (McConnell and Dittmer, 2018: 155; Murray, 2012; Benwell and Pinkerton, 2016: 9; Clegg, 2018: 149). In 2016, Judge Foskett found a lack of uniformity in approach: "The inference I draw from the material I have seen is that pragmatic solutions were often adopted to areas where there was potential uncertainty without the close analysis to which the issues would be subjected in a court of law." (§217). The High Court decision of 2017 concludes that in fact the Cypriot BOTs are a colonial remnant – unlike the BIOT (as it was being understood at that point at least).

In the period between this interim judgement, which requested further information from the parties, and the final judgement that was to conclude the case, by all expectations in favour of transfer, the UK government offered the transfer to the litigants as a one-off gesture. In other words, the definition of the SBA's statehood that the case forced, carried with it the implication that responsibility for protection lay with the UK. And if it could not be provided in a colonial remnant like the SBAs, it should be provided in England. What we also learn, from a parallel record relating to a case filed by Richmond residents not included in the original case in 2017, against their eviction from Richmond and into Victoria Coach Park, is that at some stage through these proceedings, the SBA governor bestowed BOT citizenship to those Richmond villagers

that had not been recognised as refugees. It is a status instituted in 1983 which in fact aimed originally to disrobe BOT populations from full British citizenship. It was then revised in 2002 to allow the right of abode. And yet, the SBAs remain exempted from its stipulations. Whether it was a ruse to appease feelings in a community that was increasingly fragmented and exhausted by the drawn-out case, or a bid to outsmart FCO recalcitrance is uncertain.

As it presumably closed the door on other refugees claiming transfer by not concluding in order to set a precedent, the Richmond case potentially opened the door for a questioning of the very existence of the SBAs. The international relations surrounding the Richmond case, are, in this sense, its greatest achievement. This is because at the time the case was being heard in the UK, the Chagos case was being considered at the International Court of Justice, which decided, in 2019, that the creation of the BIOT was in fact unlawful and that the decolonisation of Mauritius was therefore still to be completed.[8] In that case, Cyprus had submitted, as interested party, a note to the ICJ considering Chagos (also Minas, 2019).[9] The Richmond case points to the same conclusion about Cyprus even though the correspondence between the two decisions may not be entirely straight forward (Hadjigeorgiou, 2022). One of the lawyers noted how the RoC appears aware of the significance of the Richmond case on this question:

> "I heard at a meeting [a legal adviser to the RoC government] using the *Bashir* to say 'see? The bases are residual and so they do not have sovereignty'" (Interview #4, 27:52-30:35).

In this sense, the Richmond case presents a rather ambivalent and paradoxical conclusion regarding the efficacy of conventional activism. In terms of what it set out to do, i.e. ensure that the rights of refugees were being honoured in the UK, it secured a successful result, most spectacularly by effecting the transfer of the refugees to England

[8] ICJ, Legal Consequences of the Separation of the Chagos Archipelago from Mauritius In 1965, Advisory Opinion of 25 February 2019.
[9] ICJ, Written Statement commenting on Other Written Statements, submitted by the Republic of Cyprus, Re: Legal Consequences of the Separation of the Chagos Archipelago from Mauritius in 1965 (Request For An Advisory Opinion), 11 May 2018

and Scotland, as they had originally requested. However, it achieved this out of court and not by setting a precedent that could clearly connect refugee protection in BOTs to protection in Great Britain (this is still to be achieved potentially through a future case that might reach the conclusion that the Richmond case left unfinished). And paradoxically, its most important achievement, which was a redefinition of the sovereignty of the SBAs (and by extension the sovereignty of the UK as still a colonial power in need of a decolonisation process), was arguably of most benefit not the refugees themselves but to another state, the RoC, which had been reluctant to accommodate their plight in the first place. Still, what cannot be underestimated, is the fact that in achieving this conclusion, the Richmond case serves as a warning to a migration regime that increasingly relies on producing exceptions to skirt protection responsibilities: that there is risk entailed for states in doing so, and that the stakes in overextending their powers to declare exceptions might be their own sovereignty.

4. Contentious Activism: Protests Outside the Litigation Process

Ambivalent and paradoxical as the successes of litigation activism may have been, they hinged on the concerted efforts of lawyers, refugees, and organisations (civil society organisations like the refugee rights NGO KISA which originally took up the case, and international organisations like UNHCR, which intervened at crucial points in the case). There is no doubt that these efforts were initiated in the first place by the attention that the case attracted from media (see next section), initially local and later international, which in turn was spurred by the protests that the refugees undertook at different stages of their struggle. Taken as exemplifying contentious forms of activism, in the sense of activists being "mostly aware of the risk involved in civil disobedience and is prepared to face legal prosecution" (Neumayer and Svensson, 2016: 140), it is important to see how such activism works outside, but also in tandem with, conventional forms, in this case the litigation process. It is also important to document this activism as part of enriching the knowledge on refugee activism, on which the literature still remains scant (Abrams, 2016). As Steinhilper argues, "[d]ominant movement theories … consider

migrants to be unlikely contentious actors due to legal obstacles, scarce resources and closed political and discursive opportunities" (2018: 574-575). An outline of the contentious form of activism that Richmond refugees undertook provides an instructive perspective on the micro-level of such processes that may often unrecorded (Jasper and Duyvendak, 2014).

Protests took differing forms over the years. They in fact preceded settlement in Richmond: the press reported hunger strikes undertaken to protest delays in processing asylum claims and detention conditions at Akrotiri back in 1999.[10] The next reported protests came after the serving of eviction notices in 2007. These protests that Richmond villagers staged at different points are conspicuously absent from the court record. The 2011 decision makes a brief reference to protests in early 2007 against eviction notices: "[f]ollowing [these] protests these notifications were temporarily withdrawn" (2011: §11), new notices served in 2010 when welfare was also cut. A later decision gives a different view, quoting the lead litigant, Tag Bashir directly: "these protests went on for weeks around March 2007" (2016: §1 40). In both presentations, legitimately concerned refugees demand little more than to stop impending calamities that would otherwise leave them without food and shelter. The protesting refugee, according to these presentations, is a vulnerable subject. And in response to this vulnerability, the caring state ceases to pursue, what we might understand to be an inhumane policy.

Of later protests in Richmond, the media record reports a less humanitarian approach. A few months after the refugees' successful protest, from 18 October 2007 to 13 January 2008, eight of Richmond's male residents occupied a tower on the base unfurling banners asking for British passports.[11] The authorities took a much tougher stance to this protest, demolishing the homes the protesters had left unoccupied. It was suggested at the time that this response may have been prompted by a separate and seemingly unrelated protest of Cypriot youths outside the base questioning British

[10] Hamza Hendaw, Episkopi refugees on hunger strike, Cyprus Mail, 8/4/1999, accessed at http://www.hri.org/news/cyprus/cmnews/1999/99-04-08.cmnews.html#04.
[11] See https://athens.indymedia.org/post/827349/

military presence on the island.[12] It is difficult to know whether the protesters, or at least some of them, were recognised refugees. Presumably, they would have been left with no option but to relocate to the Republic. This enforced relocation is not registered as such in the court proceedings. On the contrary, the Akrotiri judges note that "those who … have voluntarily relocated in the RoC … [m]any are now working in the RoC, their children are in full time education, have all the appearance of having integrated well, and none has been deported" (2011: §68). They do not mention if this includes any of the evicted protesters, or indeed, if it does not, what has happened to them. In this sense, the violent quashing of the protest, through the demolition of the homes and the presumably enforced relocation is silenced, reinterpreted, and rendered irrecoverable.

There are likewise scant references to another protest, taking place after the legal case was filed, lasting from March to May 2015, when some of the Richmond residents demanded their right to be relocated to the UK by protesting at the main highway leading to the base.[13]

A few months later, in October that year, a new group of refugees would protest in the base. These protesters were among 114 refugees who had landed in Akrotiri and were being temporarily housed in tents behind security fences in Dhekelia as a Memorandum of Understanding (MoU) that had been signed with the RoC in 2003 assigning responsibility of refugee protection to people arriving on the SBAs theretofore to the RoC, was being put into effect. Amid delays and uncertainty, people scaled the barbed wire fence, threatened suicide, and put the tents on fire.[14] The court case cites the fact that people were still housed in tents in Dhekelia even as it confirms the transfer of some of them to the RoC as indication that the MoU is operative (2016, §169-173). A visit by the Council of Europe's Committee for the Prevention of Torture would revisit the events in 2017 and question the conditions in the "transit facility" and the processes through which status determination was conducted and the deportation of 12 people to Lebanon effected in May 2016.[15] This protest also prompted fresh media attention to

[12] See http://postmanpatel.blogspot.com/2008/01/cyprus-after-refugees-protest-uk-forces.html.
[13] See https://cyprus-mail.com/2015/05/03/boat-people-marooned-on-british-bases/.
[14] See https://cdn.theguardian.tv/mainwebsite/2015/11/02/151102CyprusBaserefugees_desk.mp4.
[15] See https://rm.coe.int/pdf/168076e130

the plight of Richmond villagers (see also next section).[16]

Finally, another protest, in early 2016, was staged by one of the rejected asylum seekers living in Richmond since 1998 who set up a tent opposite the SBA police station, protesting the decision, the precarious situation it had created for him and his family, and the living conditions they were in.[17] This was the longest, but least reported of all protests I collected information about. Richmond residents recalled it readily in 2018, as a protest that had lasted for months. At times the whole family would join and supporters would stop by. Its effects were uncertain – if anything, it seemed to have made matters worse. For those involved, it was the toughest part of their lives in Richmond; and in return some of them felt that authorities were now more disinclined to heed their plight than before. Seeing the legal case progress successfully during the time they protested, they wondered if their exclusion from the offer the refugees got was targeted and retaliatory.

We can see that this form of contentious activism preceded the more conventional form of litigation but also continued to develop alongside it. It is noteworthy, however, that it was largely carried out by people who were not involved in the legal process as litigants. Some of the activists and humanitarians observing the developments commented that the legal case and the period of protest created rifts in the community of Richmond residents that they found difficult to comprehend in detail. In this sense, it would appear that the more conventional approach had a dampening effect on to contentious means, keeping litigants from resorting to them. Before the legal case, contentious means helped open the way for a more conventional approach, but when this was underway, litigants were more reluctant to undertake contentious action. In an inverse direction to what Bishara finds for larger contentious actions under authoritarian regimes (Bishara, 2021) it had a "transformative effect" on the politics of the community but instead of deepening and broadening, it contained and dampened it.

[16] See Morris and Velikova, The Independent, 23 October 2015.
[17] https://s.telegraph.co.uk/graphics/projects/British-base-Cyprus-limbo/index.html.

At the same time, it should be emphasised that another kind of activism amplified both the conventional and contentious form. This was the involvement of those who supported the refugees, from the media, to artists, to humanitarians, as mentioned earlier. This activism, taking place in the cultural sphere lent support to both groups of litigants and protesters, helping to make their plight public and visible. So, while conventional and contentious forms may at times have been conflictual, cultural activism was supportive to both.

5. Cultural Activism: Media and Art

The main forms that cultural activism in support of the Richmond refugees took over the years have been in the spheres of media and art. Although the second would seem more directly associated with culture than the first (e.g. Firat and Kuryel, 2011; Dobson and McGlynn, 2013; Jelinek, 2014; Duncombe, 2016; Reed, 2019), the inclusion of media reports in this section helps to elucidate the connections that enabled other forms of activism to arise. In this sense, media reports were constructive in raising awareness in the public and by attracting actors who then played a role in furthering cultural activism. In addition, the media reporting on Richmond, as this section shows, largely straddled the cultural sphere by often concentrating on human interest stories. Thus, for the purposes of this paper, media attention would fall under a broad definition of cultural activism (e.g. DeLaure and Fink, 2017) which includes various forms of media (Cammaerts, 2005; Carroll and Hackett, 2006; Mohring Reestorff, 2017; Lievrouw, 2023).

In terms of media attention, when the group originally arrived in 1998, the case was covered by the national English- and Greek- language press like the high-circulation *Philelefteros* and *The Cyprus Mail*. In the course of the case, and particularly after it moved from courts in Cyprus (Akrotiri) to English courts, it attracted the attention of mainstream UK media like *The Guardian*, which reported on the case several times since 2014 and up to the conclusion of the case in 2018, as well as reporting on the other

groups of refugees which had arrived in 2015, as described in the previous section.[18] The case also received sustained coverage from *The Telegraph* in an extended travel feature in 2015, which is likely to have been sparked by interest in the new group of arrivals at that time.[19] Once a conclusion and its ramifications for the UK came within sight, Channel4 also ran news stories on it, as a feature following the individual story of the move to England of one of the litigant families in 2018 and 2019.[20] The conclusion of the case also attracted the attention of *The Economist* and *Euronews.*

Seen in terms of awareness-seeking activism, it is no surprise that it is the liberal-leaning media that has picked the story and sustained its interest in it. It is perhaps noteworthy in this sense that the media less inclined towards supporting refugee rights ignored it rather than attempting pro-governmental readings. This might be due to the small scale of the case and its location far from national politics, that were probably not deemed important enough to merit attempts to raise awareness or polarise opinion on the topic.

In the national press, the story was largely muted appearing as the case was closing. The high-circulation national newspapers *Philelefthеros*[21] and *Politis*[22] reported on it in 2018 and 2019 respectively, as the case concluded and the refugees were leaving, while the local press reported on it in 2016.[23] In all cases, it was presented as a

[18] See https://www.theguardian.com/world/2014/oct/21/refugee-families-marooned-raf-base-cyprus; https://www.theguardian.com/world/2015/oct/21/refugee-boats-akotiri-uk-military-base-in-cyprus; https://www.theguardian.com/world/2015/oct/21/refugee-crisis-british-raf-akrotiri-cyprus-what-next; https://www.theguardian.com/world/2015/nov/03/refugees-plead-for-release-raf-base-cyprus; https://www.theguardian.com/uk-news/2015/nov/08/cyprus-british-base-dhakelia-refugees-judicial-review; https://www.theguardian.com/world/2015/nov/19/cyprus-takes-in-nearly-half-of-raf-base-refugees; https://www.theguardian.com/world/2016/apr/28/refugees-uk-military-bases-cyprus-theresa-may; https://www.theguardian.com/uk-news/2017/may/25/uk-migrants-cyprus-british-military-base-court-of-appeal-home-secretary; https://www.theguardian.com/uk-news/2018/dec/03/refugee-families-allowed-to-enter-uk-after-20-years-at-raf-base.
[19] See https://s.telegraph.co.uk/graphics/projects/British-base-Cyprus-limbo/index.html
[20] See https://www.channel4.com/news/the-shipwrecked-refugees-marooned-for-twenty-years-on-a-british-military-base-in-cyprus; https://www.channel4.com/news/refugees-living-on-british-military-base-in-cyprus-allowed-to-settle-in-uk and also https://www.channel4.com/news/by/simon-israel/blogs/government-loses-appeal-after-refusing-to-resettle-stranded-cyprus-refugees.
[21] Τέλος στο δράμα 31 προσφύγων στις βάσεις Δεκέλειας - Άδεια εισόδου στην Βρετανία [End to the drama of 31 refugees in the Dhekelia Base – Entry Visa from the UK], Philelefthеros 4/12/2018.
[22] See https://politis.com.cy/276155/article
[23] See https://larnakaonline.com.cy/2016/01/18/13231/

human story in much the same terms as the life stories presented in the UK media. Coverage was also given by *Politis* to the 2015 protests by the second group of arrivals, which was on the whole sympathetic to the protesters, speaking of the bad conditions they were being detained in.[24] It is notable that the transfer of that group from Akrotiri to Dhekelia was widely covered by major news outlets (Cyprus News Agency [CNA], RIK, Kathimerini, Sigma, ANT1) but mostly in reproduction of a short SBA press release describing the process and quoting verbatim from it that "the British government has clarified that it will not allow the opening of a new corridor for migrants to Great Britain and will continue to work closely with the Cypriot authorities" (CNA 27/10/2015).[25] When the first boat had arrived in 1998, there was at least some reporting on the refugees' plight, presumably in both the English- and Greek- speaking press, as the *Cyprus Mail* had spoken of "generous donations from all over Cyprus [that] had poured in for the 75 illegal immigrants who came ashore off the bases".[26] This was in stark contrast to the treatment African refugees were receiving at the same time from the authorities of the Republic, with reports of squalid conditions for those on asylum applications and beatings while in detention for those rejected and awaiting deportation.[27]

These differences in the local media presentations are indicative of wider societal -and cultural- processes underway in these two decades, whereby the arrivals of refugees have become increasingly securitised, turning from surprise events to a daily issue of political polarisation. Thus, even though the story of police brutality in the Republic had received attention and wide criticism, the Richmond refugees, and indeed the other asylum-seekers arriving in the Republic in 1998 had received support from the public, but following this initial period the story was completely muted until it momentarily surfaced in 2015 with reports on the protests and finally became a human interest story at the conclusion of the case. Sustained attention was absent but at the

[24] See https://politisonline.com/kosmos/213669/σάλος-στη-βρετανία-από-τις-εικόνες-ντρ/;
[25] See for example https://www.sigmalive.com/news/local/279075/apo-akrotiri-se-dekeleia-meteferan-tous-prosfyges-oi-vaseis.
[26] Jean Christou "Immigrants appeal to Amnesty" 27/10/1998, Cyprus Mail.
[27] See also Demetriou et al, 2023.

same time, through the various phases of reporting, the Richmond refugees appeared generally in a positive light. One reason for this may have been that they were in fact located on the base and not seen as a responsibility of the Republic. The story appeared to have provided a good opportunity to criticise the UK migration regime without delving into the polarising politics of the Cypriot one.

Turning to the second plane of cultural activism, the plight of Richmond residents came into public view through art-focused activism. The first intervention was in 2009 by Sarah Malian, a Cypriot-born photojournalist, who undertook a project in Richmond, presenting family portraits of a selected group of residents.[28] A much longer project was undertaken by Cypriot video artist Efi Savvides, from 2016 until 2020. This was a project that resulted in several film and video installations, a number of photographic series, and paintings. The artworks were presented in various art venues around the island, culminating in an art exhibition hosted by the municipality of Larnaca in 2021, which received considerable attention in the media and by visiting officials. Having closely worked with the artist, I had the opportunity to observe the production of this work, the relations it involved with Richmond residents, and the presentation of its results (for an extensive discussion see Demetriou, 2023).

What is important to note of Savvides' project is that it was not framed at the outset as activism. In fact, on several occasions, she said she was neither an activist nor an artist producing art for art's sake. Throughout her engagement with Richmond residents, she liaised with lawyers, activists, politicians, and government officials on the specifics of the case and the technicalities detailed in each of the decision letters the family received. She did so in the context of working closely with Richmond residents, visiting them daily, spending time in their homes, at work in the fields, with the children and their parents, and documenting through her photographic and video lenses their routines, thoughts, and concerns. Her activism, therefore, was interwoven with her

[28] http://www.sarahmalian.com/Sarah_Malian_%7C_Documentary_Photography/Richmond_intro.html

artistic practice, and the results were often events to which residents expressed opinion, were invited, or took part.

This work was well received in artistic circles and official circles, with government officials visiting the art venues and offering endorsement just as Cyprus continued to harden its refugee protection policies. This paradox could be explained by the fact that the case concerned the British bases, but also through the form of the activism in question. In the political economy of art in Cyprus, the production of works often depends on state funding, and it is to some extent policed. Up until now, at least, only art that relates to the Cyprus conflict has been censored (Davis, 2023). Artists have been denied funding already pledged, threatened with having their works withdrawn from exhibitions, or faced disciplinary proceedings in their professional environments. But thus far the state has not attacked art about migrant and refugee communities, even as it has disciplined activists on these very same issues, shutting down organizations on bureaucratic pretexts and while funding exhibitions on themes of borders, resistance, migration, and statelessness. This suggests that art-based activism might on the one hand be less able to intervene in the sphere of high politics, but on the other hand is for this reason that it also enjoys greater acceptance by the authorities. This presents both an opportunity and a limitation.

6. Analysis: Relations and Comparisons between Forms of Activism

The three forms of activism that operated in the case of Richmond did so largely in relation to one another rather than in isolation. The litigation process elicited media attention and media attention elicited cultural activism, for example. Some protests developed in response to the litigation process, as this came to exclude some residents. Other protests segwayed into litigation. Still other protests (e.g. those of the people who arrived in 2015) were completely unconnected to the legal process and to the litigants but attracted interest that then spilled over into media attention and cultural activism. In this sense, a comparative perspective on these forms of activism must take account of these relations rather than assume the actions as completely distinct and

unconnected fields. It is from such a perspective that it makes sense to see which actions have had more successful outcomes than others, and which ones also entailed more costs and risks to those who undertook them than others. Thus, for example, the fact that the protests of those residents not involved in the legal case went unheeded and, if we are to believe the protesters, were met with a punitive stance, is very likely related to the fact that the legal case was progressing in the way that it was, making it the absence of a legal resort more evidently a factor of weakness for the protesters.

The following table summarises the actions that this report has surveyed, identifying them as tactics and strategies and categorising them in terms of the form of activism they fall under, the successful outcomes they resulted in, and what their risks and costs have been to the refugees involved in them.

FORMS OF ACTIVISM	***TACTICS AND STRATEGIES***	***SUCCESSFUL OUTCOMES***	***COSTS / RISKS***
Conventional	Resettlement litigation; Anti-eviction litigation	Visibility; Transfer to the UK Postponement of move	Only for litigants; no precedent; limited applicability Eventual eviction
Contentious	Protests; hunger strikes; road closures	Visibility; ad hoc negotiations; CPT reporting; postponement of eviction	Demolition of homes; transfer to RoC; punitive response
Cultural	Media reports; art exhibition; photojournalism project	Visibility; moral and material support; sustained contact	Exposure

Table 1: Forms of activism connected to the Richmond case.

From the table, it can be seen that the most successful outcome was achieved through conventional activism in the form of the legal case. At the same time, it is also evident that a similar form of activism, in the form of a second case against evictions to Victoria Coach Park was unsuccessful. The success of conventional activism, if this form is seen in isolation from the others, thus seems to be that it rested on a fundamental tenet of

human rights represented by the Refugee Convention rather than other principles around the right to housing. If one thing can be said about conventional activism therefore, it is that holds great potential but the normative threshold of what needs to have been violated in order to elicit a successful outcome is very high. This conforms to the wider trend that we see in refugee and migration activism, where the space for successfully accessing these rights is increasingly being constricted through the measures and policies outlined in the introduction.

The least successful outcomes, as seen in the table, arose from contentious forms of activism. Protesters' claims were rarely heeded: in the case of the most spectacular of protests, those in 2015, the protesters were transferred to the Republic and processed there. In other responses, homes were demolished. And in the case of Richmond residents who were not recognised refugees, their long-term protest left them bruised and disillusioned, more disconnected from other residents than before, and with no heeding of their claims. Where this form of activism seems to have delivered some successful outcomes was in connection with other forms. The initial protests of the refugees upon arrival drew media attention and may have catalysed their transfer to Dhekelia and Richmond. Later protests over the first eviction notices also drew the attention of refugee rights organisations and catalysed the beginning of the legal case. And other protests over conditions drew the attention of the CPT and resulted in critical reports through which presumably processes and infrastructures were later improved. In this sense, the most successful outcomes of contentious activism were in the conventional sphere via mediation by the cultural.

Lastly, the outcomes of cultural activism seem more successful than costly, but are also more limited. Cultural activism offered visibility that catalysed other successes but did not deliver by itself definitive successes. It did, however, also offer support to Richmond residents in material and emotional senses that are more difficult to quantify. To measure these successes it is necessary to approach the study in a more ground-level way, listening, for example, to residents as they speak of the importance of visiting activists and the artist who has closely worked with them, in enduring the everyday battles of protests and litigation. The risks that this entails are also more difficult to

pinpoint as they largely revolve around the exposure of individuals and the community that comes with increased public awareness and attention.

Many of these observations conform to what studies of activism have been suggesting in recent years. For example, that contentious activism requires specific opportunity structures to be in place in order for it to succeed (McAdam et al, 2003; Alimi, 2009; Tilly, 2017); that conventional activism operates in a constricted sphere (Grimmel, 2014; Kawar, 2015; Cummings 2018); that cultural activism is most powerful on the affective plane and necessary for building and expanding networks (McCosker, 2015; McLean et al, 2019; Garland, 2020). What this study offers is a micro-level analysis of these operations that through a multi-faceted approach (socio-legal, media, ethnographic) allows us to see the forms of activism in combination and in their development in the long-term. The small-scale frame of the analysis, in this sense, acts as an enabling factor in allowing the research to zoom in on the details surrounding the processes under observation, adding a complementary perspective on the bigger-picture approaches that movement studies often takes. Through this approach, we are able to see how hugely significant outcomes of activism, such as refugees redefining states, and state sovereignty being questioned, are broken down into constituents of smaller, more ambivalent, and paradoxical outcomes. Or, flipping the terms, it allows us to see how activism, working across different forms and in many guises, can yield results that are larger than its constituent parts.

7. Conclusion

This paper has documented different forms of activism employed in the course of refugees seeking their rights in a British Overseas Territory. It has analysed the dynamics that unfolded in the legal process which decided that these rights were not being fulfilled in such an exceptional location, ending in the transfer of the refugees to Great Britain. It has elucidated the ways in which this conclusion also questioned the sovereignty of the British bases in Cyprus, opening up possibilities for restricting the expanded sovereignty that states now routinely have come to acquire by claiming exceptional rule over territories. The chief lesson of the Richmond case is thus

undoubtedly that the failure of states to protect refugee rights entails risks for the state and not just for the refugees. This is what I have proposed by the suggestion that refugees define states.

The analysis of this process through attention to activism dynamics has revealed a second set of important insights. Firstly, the overall outcomes of activist initiatives has, at least in this case, been much larger than its parts. Secondly, activism has taken a number of different forms, which in order to properly appreciate should be seen together rather than in isolation. Thirdly, these forms have each entailed successes as well as risks and costs.

To appreciate the complexity involved in the processes examined here and in the ways in which forms of activisms were related to each other, it has been necessary to take a ground-level approach, combining different forms of data (legal documents, archival media material, ethnographic observation) that allow a view of how micro-processes develop in the long-term. In undertaking this research the paper has sought to contribute to our understanding of activism around refugee rights in an era of great political and policy shifts in this area.

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