

Differential Inclusion and the Citizenship Paradox: Roma in the European Union and Tibetans in India

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ABSTRACT

Roma in the European Union hold full national and Union citizenship together with the protection of a two-decade legal and funding architecture, yet record poverty at more than four times the Union average. Tibetans in India hold no citizenship of any state, yet built a school and health system delivering literacy above the Indian national average. This paper reads both as differential inclusion rather than exclusion, and argues that the variable tracking the divergence is not legal status but the structure of the chain between the authority recognising an entitlement and the office handing it over. The European chain is long, discretionary and terminates in municipalities answerable to electorates in which the beneficiaries are a small and unpopular minority; the Tibetan chain is short and terminates in an administration accountable to the population it serves. The finding is not a case for services over rights. The exile administration could not confer heritable tenure, formal employment or a status transmissible to children, and the population it educated has left, falling in India from 94,203 in 2009 to 72,312 in 2020. Provision without status secures a generation, not a community; entitlement without delivery secures neither.

Keywords: Differential inclusion, Citizenship paradox, Delivery-chain accountability, Roma, Tibetan exile, Documentary citizenship, Protracted displacement, Municipal discretion

Two disjunctures

Roma in the European Union hold the fullest legal membership the continent confers: citizenship of member states and of the Union, and the protection of the Racial Equality Directive, the Charter of Fundamental Rights and a strategic framework running since 2011 with substantial structural-fund allocation behind it (European Commission, 2020; van Baar, 2011). Fundamental Rights Agency surveys record 80 per cent living at risk of poverty in 2021 and 70 per cent in 2024 (FRA, 2022, 2025), against a Union rate of 16.2 per cent (Eurostat, 2024). The same rounds record 83 per cent in overcrowded accommodation against a Union rate of 17.3 per cent, and paid work reaching 43 per cent against a Union employment rate of 73.1 per cent.

Tibetans in India hold no citizenship. Their presence is regulated under the Foreigners Act; they carry

Registration Certificates renewable at intervals and Identity Certificates in place of passports, cannot own agricultural land in most states, cannot vote, and are excluded from government employment (McConnell, 2016; Tibet Justice Center, 2016). The Central Tibetan Administration's demographic survey of 2009 recorded effective literacy of 82.4 per cent among those aged six and above (Planning Commission CTA, 2010), against an Indian census rate of 74.04 per cent (Government of India, 2011), alongside a school system running from primary through college, a health department operating hospitals and clinics, and a welfare apparatus reaching the settlements (Roemer, 2008).

That legal status underdetermines outcomes is well established (Bloemraad, 2018; Sardelic, 2021); the question is what else is doing the work. The pairing is a most-different-systems design on the variable of interest

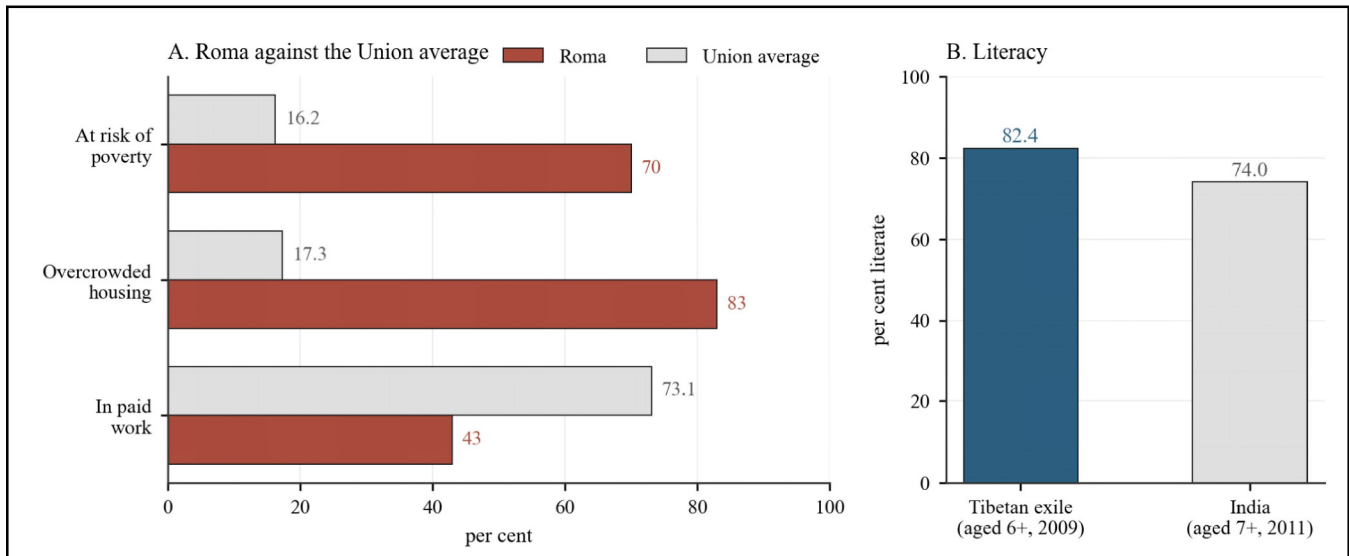


Fig. 1 : The two disjunctures. Panel A sets Roma outcomes against the Union average; Panel B sets exile Tibetan literacy against the Indian rate. Sources: FRA (2022, 2025); Eurostat (2024); Planning Commission CTA (2010)

(George and Bennett, 2005), and the Tibetan case supplies a configuration with no European equivalent: a non-citizen population administered by its own government-in-exile over sixty years. Testing the European mechanisms against it establishes whether they are the mechanisms that matter or merely those available to be studied (Vermeersch, 2012).

Three claims follow. Both cases are differential inclusion in the sense developed by Mezzadra and Neilson (2013), incorporation on terms that stratify rather than equalise: Roma are included in European legal membership and excluded from its material realisation (van Baar, 2017; Yildiz and De Genova, 2018), Tibetans excluded from Indian membership and included in a parallel administrative order. The variable discriminating between the outcomes is institutional density at the point of delivery, since rights without a delivery agent have produced less than services without rights. And the Tibetan arrangement is not stable: the exile population in India stood at approximately 94,203 in 2009 and at 72,312 in the census conducted for December 2020 (Planning Commission CTA, 2010; Migration Policy Institute, 2021).

Differential Inclusion, the Citizenship Paradox and the Delivery Chain

Mezzadra and Neilson (2013) developed differential inclusion against the habit of treating borders as devices of exclusion. Borders sort people into differentiated legal

positions determining the terms on which labour is available, and the sorting continues after entry through internal administrative boundaries. The concept has been extended to internal minorities by Yildiz and De Genova (2018) and van Baar (2017), and to South Asia by Sadiq (2009) and Samaddar (2020), whose work establishes that the boundary between citizen and non-citizen is administered through documents whose acquisition is negotiable. Applied here it redescribes both cases. Romani Europeans are present in the labour market at its most precarious margins, in schooling through segregated provision, and in electoral registers only where residence registration permits (ERRC, 2020; Vincze, 2013). Tibetans are excluded from citizenship, admitted to residence, granted land on lease rather than in title, and tolerated in a self-administration India has never formally recognised.

The shared feature is disaggregation of the bundle of rights citizenship theory has treated as unitary since Marshall (1950), whose sequence of civil, political and social rights presumed a cumulation neither case displays. Two configurations recur. Citizens without substantive rights describes populations holding status whose access is obstructed at delivery, as in accounts of racialised citizenship in the United States and Dalit citizenship in India (Jayal, 2013; Thorat and Newman, 2010). Non-citizens with substantive provision describes populations without status receiving services through alternative institutions, comparable in structure though

not in scale to Palestinian provision through the United Nations Relief and Works Agency (Feldman, 2018; Kagan, 2011).

Setting the two against one another isolates delivery as the variable, since legal status varies in the opposite direction to the outcome. The mechanism proposed here is the structure of the chain between the authority recognising an entitlement and the office handing it over. The European chain is long: the Union establishes the framework, member states produce strategies, regions program structural funds, and municipalities allocate housing, register residence, define catchments and provide utilities. Each link introduces discretion, and the final link combines maximum discretion with maximum exposure to majority electoral preference (van Baar, 2011; Rostas, 2019). The Tibetan chain is short, running through the Central Tibetan Administration and its departments, funded by diaspora contributions and foreign donors and accountable to a Tibetan electorate through the Parliament-in-Exile (Roemer, 2008; CTA, 2019).

Design, Data and Limits

The design follows structured focused comparison (George and Bennett, 2005), asking of both cases what legal framework governs the population, what status it confers, through what institutions services are delivered, and what the trajectory has been. European material comprises the Fundamental Rights Agency's Roma

surveys (FRA, 2022, 2025), Eurostat series (2024), Commission implementation reporting (European Commission 2023) and civil society monitoring (ERRC, 2020; Roma Civil Monitor, 2021). Indian material comprises the Planning Commission's demographic surveys (2010), the census conducted for 2020, Ministry of Home Affairs material (2014), Indian judicial decisions, and the literature on the settlements (McConnell, 2016; Bentz, 2012).

Four limits require statement. Data quality is asymmetric: European figures rest on probability-based surveys with published methodology (FRA, 2025), Tibetan figures on administrative enumeration by a body whose coverage outside the settlements is uncertain, so cross-dataset comparisons of point estimates are indicative. Figures for Tibetan poverty incidence circulating in the range of 18 to 22 per cent have no locatable primary source and are not used. Categorisation is contestable, since Romani populations across more than ten states differ in language, history and legal position (Surdu, 2016; Messing, 2014), while the exile Tibetan population is stratified by arrival cohort (Falcone and Wangchuk, 2008). Scale differs by two orders of magnitude, a constraint taken up below.

Governance Architectures Compared

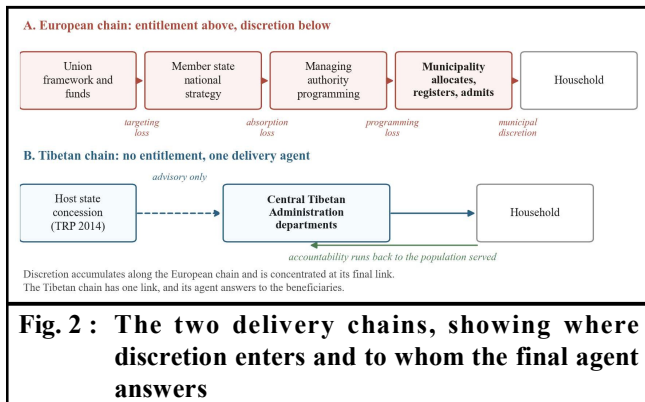
The final two rows carry the analytical weight. The European arrangement places delivery with an agent accountable to an electorate in which the beneficiaries

Table 1 : Legal and institutional position

Dimension	Roma in the European Union	Tibetans in India
Legal framework	Racial Equality Directive; Charter of Fundamental Rights; Roma Strategic Framework 2020-2030	Foreigners Act 1946; Registration of Foreigners Act 1939; Tibetan Rehabilitation Policy 2014; Citizenship Act 1955 as applied by the courts
Status held	Full member state and Union citizenship	Foreigner; Registration Certificate; Identity Certificate in place of passport
Political rights	Full franchise where registration permits	None; franchise in exile elections only
Land and property	Full rights in principle; obstructed by tenure informality and allocation practice	Settlement land on lease; agricultural ownership generally barred
Employment	Open in law; 43 per cent in paid work	Barred from government service; private work subject to documentation
Delivery agent	Municipality, under national and Union programming	Central Tibetan Administration departments
Financing	Union structural and cohesion funds; national budgets	Diaspora contribution; foreign donors; Indian grants; own revenue
Agent accountable to	The general municipal electorate	The Tibetan electorate, through the Parliament-in-Exile
Population trajectory	Stable to growing; substantial intra-Union mobility	Declining: c. 94,000 in 2009 to c. 72,000 in 2020

Sources: European Commission (2020); FRA (2025); Ministry of Home Affairs (2014); Tibet Justice Center (2016); McConnell (2016).

are a small and frequently unpopular minority (Pew Research Center, 2019; ECRI, 2022); the Tibetan arrangement places delivery with an agent accountable to the beneficiaries themselves. That difference, rather than the difference in status recorded above it, tracks the difference in service outcomes.



Europe: Entitlement Without Delivery

European Roma policy has accumulated a substantial architecture over two decades (van Baar, 2011; Vermeersch, 2012). The Racial Equality Directive of 2000 prohibited direct and indirect discrimination in employment, education, social protection and access to goods and services; the Decade of Roma Inclusion ran from 2005 to 2015 across twelve states (Rostas, 2019); and the Union Framework of 2011 was superseded by the Roma Strategic Framework for 2020 to 2030 (European Commission, 2020). Measured against the resulting expenditure, delivery has been weak: early childhood education participation rose from 42 per cent in 2016 to 53 per cent in 2024 and housing deprivation fell from 61 to 47 per cent, alongside a poverty gap that remains the widest in Union social statistics (FRA, 2025; European Commission, 2023).

Four points of attrition are documented. Structural funds are programmed by managing authorities determining calls, eligibility and selection criteria, and mainstreaming has repeatedly produced expenditure reaching the general population rather than the intended one (Rostas, 2019; Ram, 2014). Housing allocation, residence registration, catchment definition and utility provision sit with municipalities in most member states, and documented practices include siting social housing at municipal peripheries, refusing address registration to settlement residents, and designing catchments producing majority-Romani enrolment (Vincze, 2013; Filcak, 2012; ERRC, 2020). Enforcement is asymmetric,

since infringement proceedings on school segregation have stood open against Czechia, Slovakia and Hungary for close to a decade without resolution (De Schutter, 2016; Moschel, 2012). And conditionality goes unenforced (Validity Foundation, 2021).

The framework therefore generates entitlement at a level with no implementing capacity and delivers it through a level with implementing capacity and adverse incentives. Union institutions can legislate, fund, monitor and litigate; they cannot allocate a flat, register an address or admit a child to a school. Municipalities can do all four, and answer to electorates in which anti-Roma sentiment is measurable and, in several states, electorally consequential (Pew Research Center, 2019; ECRI, 2022).

Accession in 2004 and 2007 shows the mechanism operating twice over, since Romani citizens exercising free movement encounter in destination states a second municipal tier with the same discretion as the one they left (Carrera, 2014). French eviction censuses record 21,537 people evicted from informal settlements in 2013 and 10,119 in 2016 (ERRC and LDH, 2017), and Italian practice under the piani nomadi concentrated the population in monitored peripheral camps (Sigona, 2011; Picker, 2017). The Citizens' Rights Directive conditions residence beyond three months on sufficient resources and sickness insurance, a practical bar for a population in informal employment (O'Brien, 2016), and the Court of Justice in Dano, Alimanovic and Garcia-Nieto confirmed that economically inactive Union citizens may be refused special non-contributory benefits. That line of authority mentions no ethnic group; its incidence falls where informal work is concentrated (Thym, 2015).

An account resting on institutional design risks understating what the European case contains and the Tibetan case does not: a sustained and specific hostility, which the 2020 framework named for the first time as a distinct object of policy (End, 2012). Anti-Gypsyism has been theorised as structurally distinct from other European racisms in that it attaches to a population without a kin-state able to intervene diplomatically, codes that population's presence as a matter of public order, and enjoys an expressibility in mainstream political discourse comparable statements about other minorities would not survive (Nicolae, 2006; Stewart, 2012; ECRI, 2022). It supplies the electoral incentive making the municipal link behave as it does, so the delivery-chain account requires it rather than competing with it.

India: Provision Without Entitlement

Tibetan presence in India has never been regulated by refugee law, since India is not party to the 1951 Convention or its Protocol and maintains no domestic refugee statute (Chaudhury and Samaddar, 2018). Tibetans are foreigners under the Foreigners Act, and their principal documents are the Registration Certificate, renewable at administratively set intervals, and the Identity Certificate, a travel document requiring a return visa endorsement for re-entry (Tibet Justice Center, 2016). The position has been complicated by judicial development. In *Namgyal Dolkar v. Government of India* the Delhi High Court held that a petitioner born in India in 1986 was an Indian citizen by birth, and that neither Tibetan descent nor an Identity Certificate could ground refusal of a passport; a 2017 advisory extended passport availability to Tibetans born in India between 1950 and 1987 (Ministry of External Affairs, 2017; Coelho, 2022).

Take-up has been limited, since acquiring citizenship entails surrendering the Registration Certificate and, in the administration's practice, forfeiting settlement residence and services, and has been discouraged by parts of the exile leadership as prejudicial to the political claim (McConnell, 2013; Gupta, 2019). A substantial cohort therefore holds an entitlement to citizenship it declines to exercise, inverting the European position.

The Ministry of Home Affairs formalised the Tibetan Rehabilitation Policy in October 2014, recommending a standardised land-leasing arrangement and directing that Tibetans be given access to welfare schemes, trade licences and employment on terms comparable to Indian nationals (Ministry of Home Affairs, 2014; CTA, 2014). Implementation has been fragmentary, the term Balasubramaniam and Gupta (2021) use in the most sustained treatment: states adopted it at different times and to different extents. The structural point is that the policy is policy rather than statute. It creates no enforceable right, binds no state government, and is revocable.

The settlements were established from 1960 under agreements between the Government of India and the exile leadership, producing roughly forty settlements organised around agricultural cooperatives, handicraft centres and monastic institutions (McConnell, 2016; Roemer, 2008). The agricultural model rested on assumptions that have not held: allocations were sized for founding households and were not expandable,

holdings fragmented across generations, and assigned crops yielded returns falling in real terms (Choedon, 2013; Prost, 2006). The winter sweater trade developed as the principal alternative and has come under pressure from competing supply and from documentation requirements attached to trade licences for foreign nationals (Bentz, 2012).

Service provision runs through the Central Tibetan Administration rather than Indian authorities. Its Department of Education oversees the school network delivering the literacy outcomes recorded above, its Department of Health operates hospitals and primary health centres, and its Department of Home administers the settlements and welfare schemes, on revenue drawn from a voluntary contribution levied on the exile population, foreign donors and Indian grants (CTA, 2019; Roemer, 2008). Two features distinguish the arrangement from the European chain. Accountability runs to the population served, through elected representation to the Parliament-in-Exile and the directly elected Sikyong. And it operates without legal recognition, its authority resting on toleration and on the moral authority of the Dalai Lama. It could not confer status, secure tenure, licence a profession, or issue a document recognised outside the settlements.

The arrangement acquires its significance against India's treatment of other displaced populations, since the absence of refugee law has produced not uniform treatment but a graduated hierarchy administered case by case (Chaudhury and Samaddar, 2018; Samaddar, 2020). Sri Lankan Tamils number over ninety thousand across Tamil Nadu, roughly sixty thousand in state-run camps served by the state's rehabilitation apparatus rather than any community administration (Valatheeswaran and Rajan, 2011). Supreme Court directions of 1996 and 2015 that Arunachal Pradesh process the citizenship applications of Chakmas and Hajongs have met sustained local mobilisation (Singh, 2010). Afghans have been registered by the United Nations High Commissioner for Refugees since the 1980s, an arrangement Kagan (2011) terms surrogate statehood, and the Citizenship (Amendment) Act of 2019 created an expedited route for non-Muslim migrants from which Rohingya are excluded (Bhatia, 2021).

The gradation tracks neither need nor duration. It tracks the foreign-policy value of the population, its religious composition, and the political cost of provision in the state where it is settled. Tibetans sit at the top for

legible reasons: their presence served an Indian strategic interest after 1959, their leadership possessed international standing, and their settlements were located where local opposition was manageable. India's treatment of Tibetans is therefore not evidence that non-citizenship can be made to work, but evidence that a host state without refugee law distributes provision by political calculation.

The Paradox in Two Registers

The European arrangement supplies status and withholds delivery; the Indian arrangement supplies delivery and withholds status. Each population lacks what the other has.

A feature obscured by the status contrast is that the operative currency in both cases is documentary rather than legal. Sadiq's account of documentary citizenship holds that the practical boundary between citizen and non-citizen is drawn by possession of papers rather than by legal entitlement (2009). The Tibetan case fits closely, since the judicially established entitlement of the 1950 to 1987 cohort requires documentary proof of birth in India that many families cannot produce, settlement births having been recorded by the administration rather than by Indian registrars (Coelho, 2022; Gupta, 2019). The European case runs on the same currency in a different denomination, since residence registration conditioned on documented occupancy, benefit eligibility conditioned on documented employment history, and school enrolment conditioned on registered address together mean that a Romani family's practical position is determined by a documentary portfolio rather than by the citizenship it holds in law (van Baar, 2017; O'Brien, 2016).

Formal status determines what a person may claim, documentation determines what a person may obtain, and the two diverge wherever a population's history has prevented it from accumulating the records that settled, waged, registered life produces as a by-product (Sadiq, 2009; Sardelic, 2021). Romani Europeans hold the status and lack the documents; exile Tibetans lack both, and were supplied by their own administration with a parallel documentary order that converts poorly outside the community. Services can substitute for status in the medium term. Status cannot be substituted for over the long term, because status is what makes an arrangement inheritable.

The Limits of the Tibetan Arrangement

The exile population in India recorded by the Planning Commission's demographic survey stood at 94,203 in 2009, within a global exile total of 127,935 (Planning Commission CTA, 2010). The census reported for December 2020 recorded 72,312 in India, with roughly half the global exile population then resident outside South Asia (Migration Policy Institute, 2021).

The decline is driven by onward migration rather than return, which has been minimal, and it is age-selective. Working-age adults and recent graduates of the school system have departed at higher rates, facilitated by the United States Tibetan Resettlement Project of 1990 and subsequent family reunification, by asylum and skilled migration routes, and by the community networks these established (Falcone and Wangchuk, 2008; Hess, 2009; Yeh and Lama, 2006). Settlements report ageing populations, unoccupied housing and school closures (Choedon, 2013).

An arrangement that educates a generation and then loses it has not solved the problem it appeared to solve, and literature treating Tibetan settlement as a model of successful protracted refugee management describes the service outputs while setting aside the demographic outcome (Kagan, 2011; Feldman, 2018). What the administration could deliver was education, health, welfare and internal political voice. What it could not deliver was any of the goods determining whether an educated adult builds a life in place: heritable tenure, formal employment and professional licensure, travel without a documentation regime, and a status transmissible to children. Those goods are attributes of citizenship, and institutional competence does not substitute for them once a population can exercise the exit option.

Onward migration might instead be read as success, since a community whose education system equips its members for opportunity abroad, and whose diaspora sustains the settlements through remittance and advocacy, has achieved something a static population would not (Hess, 2009; Yeh and Lama, 2006). Three considerations weigh against it. The settlements are the institutional basis of the exile political project, and their contraction erodes the plausibility of the return claim (Roemer, 2008). The remaining population is disproportionately old and without the means to leave. And the departure rate is itself an index of the arrangement's terms.

Rival Explanations and the Limits of the Comparison

The most serious constraint on policy inference is scale. The administration serves a population under a hundred thousand, concentrated in a few dozen settlements and organised around an institution of exceptional moral authority (McConnell, 2016), while European Romani populations number in the millions, are dispersed across fifteen or more states, and possess no comparable central institution (Vermeersch, 2006). What survives the difference is narrower than replication: the identification of delivery-agent accountability as the variable, which suggests European reform should attend to who delivers rather than only to what is promised.

Three alternatives are compatible with the account rather than rivals to it. Endowment matters, since the exile population arrived with a monastic educational tradition and a religious institution able to mobilise international support (Prost, 2006), but the endowment supplied the institution and the institution supplied the delivery, and it cannot account for the European outcome, since Romani populations in several member states possess community institutions holding no delivery role (Trehan, 2001; McGarry, 2010). Duration matters, since Romani marginalisation is six centuries deep and Tibetan exile six decades (Surdu, 2016; Stewart, 2012); this predicts, correctly, that the European case is harder, but not that Union-level entitlement fails specifically at the municipal link (Rostas, 2019). And international attention has favoured Tibetan exile disproportionately (Hess, 2009), which does not displace the argument, since Union allocations have been large in absolute terms.

A fourth objection is harder to dismiss. Exile is selective, and those who crossed the Himalaya in 1959 and after may differ from the Tibetan population as a whole in ways predicting educational outcomes independently of any institution, whereas Romani populations underwent no comparable selection. The objection is sound and its magnitude unmeasurable, since no baseline for the pre-1959 population exists. Two considerations limit its force. The exodus was substantially a movement of whole communities including the aged and the ill, with documented mortality in the first years of settlement (Norbu, 2001). And the literacy outcome recorded in 2009 was achieved by a generation born in exile, which locates the causal work in the institution rather than in the founding cohort. Beyond this, the design is a paired comparison and cannot support causal inference in any strict sense (George and

Bennett, 2005). Nor does it settle whether a population should accept improved provision on terms deferring recognition (McConnell, 2013).

Policy Implications

For European governance, three recommendations follow, each with its cost. Bind the municipal link: structural fund disbursement for housing, education and utility infrastructure should be conditioned on verified municipal compliance with non-segregation criteria, with verification independent of the recipient authority (Validity Foundation, 2021; ENIL, 2020); suspension bears on the regions least able to absorb it, and without ring-fenced transitional funding it reaches services rather than the practice complained of. Sever registration from tenure, since conditioning residence registration on documented legal occupancy excludes settlement residents from the franchise, from social assistance and from school enrolment (ERRC, 2020). And move beyond intermediated representation, since reserved municipal roles with elected rather than appointed Romani representation would shift a donor-funded model that has produced capacity at national level and thin accountability to settlement constituencies (Trehan, 2001; Kocze, 2012).

For Indian and host-state governance, three follow. Legislate what the policy concedes, since the fragmentary implementation of the Rehabilitation Policy reflects its status as advisory guidance, and converting its land-lease and welfare provisions into a statutory instrument binding on states would address the principal source of variation, at a political cost the Arunachal Pradesh episode makes plain (Balasubramaniam and Gupta, 2021). Extend commercial and property leasing, since restrictions constrain any economic base beyond seasonal trade (Choedon, 2013). And establish a long-term residency status conferring access to formal employment, professional licensure and property, not conditioned on surrendering the Identity Certificate or settlement residence (Coelho, 2022).

Two proposals the comparison might appear to license should be set aside. The first is replication of the Tibetan model through a Romani body with delivery functions; beyond the scale objection, this misreads the institution's basis, since its authority derives from a claim to constitute the legitimate government of a territory under occupation (Roemer, 2008). No Romani equivalent exists or is sought, because Romani political thought has

largely and deliberately declined the territorial-nation form (Klimova-Alexander, 2005; Vermeersch, 2006). The second is the reading of the Tibetan case as an argument for accepting reduced status in exchange for improved provision (Rostas, 2019).

One proposition is general enough to travel. Where the delivery agent's constituency is the beneficiary population, delivery is substantially better; where it is a wider electorate in which the beneficiaries are a small and unpopular minority, delivery attenuates regardless of the entitlement above it (Kocze, 2012).

Conclusion

Roma in the European Union hold full citizenship and record poverty at four times the Union average (FRA, 2025; Eurostat, 2024). Tibetans in India hold no citizenship and built a school and health system delivering outcomes above the Indian national average (Planning Commission CTA, 2010; Government of India, 2011). Neither result follows from legal status, and the variable tracking the divergence is the structure of the chain between entitlement and delivery: long, discretionary and adversely incentivised in the first case, short and accountable to the beneficiary population in the second. That finding is not a case for services over rights. The administration could not deliver heritable tenure, formal employment or a status transmissible to children, and the population it educated has left in pursuit of those goods (Migration Policy Institute, 2021).

Both cases are differential inclusion and neither is exclusion (Mezzadra and Neilson, 2013; van Baar, 2017). What differs is the axis along which the differentiation runs. The European arrangement differentiates at the point of delivery, admitting the population to membership and rationing what membership yields through municipal discretion; the Indian arrangement differentiates at the point of status, supplying what membership would yield while withholding membership itself. Reading them as one case of failed inclusion and one of successful sanctuary obscures that both are the same operation conducted at different points in the same sequence. Two directions follow. Comparative work on protracted refugee situations administered by community bodies would test the delivery-chain proposition against cases this design cannot reach (Feldman, 2018). And the cohort of Tibetans who have taken Indian citizenship since 2010 constitutes a natural experiment on the substitutability of status for provision.

REFERENCES

- Balasubramaniam, M. and Gupta, S. (2021). Disciplining statelessness: fragmentary outcomes of the Tibetan Rehabilitation Policy in India. *Asian Studies Review*, **46**(1) : 74-92. doi:10.1080/10357823.2021.1931030
- Bentz, A.S. (2012). Being a Tibetan refugee in India. *Refugee Survey Quarterly*, **31**(1) : 80-107. doi:10.1093/rsq/hdr016
- Bhatia, G. (2021). The Rohingya deportation order and the Supreme Court. *Indian Constitutional Law and Philosophy*, commentary, April.
- Bloemraad, I. (2018). Theorising the power of citizenship as claims-making. *J.Ethnic & Migration Studies*, **44**(1) : 4-26. doi:10.1080/1369183X.2018.1396108
- CTA (2014). Government of India formalises Tibetan Rehabilitation Policy 2014. Dharamsala: CTA.
- CTA (2019). Annual Report of the Department of Home. Dharamsala: CTA.
- Carrera, S. (2014). The framing of the Roma as abnormal EU citizens, in Guild, E., Gortazar Rotache, C. and Kostakopoulou, D. (eds.) *The Reconceptualization of European Union Citizenship*. Leiden: Brill Nijhoff, 33-63.
- Chaudhury, S.B.R. and Samaddar, R. (eds.) (2018). *The Rohingya in South Asia: People Without a State*. London: Routledge.
- Choedon, Y. (2013). The Tibetan community in exile: economic dimensions. *China Report*, **49**(4) : 391-411.
- Coelho, J.P. (2022). The paradox of citizenship and nationality among Tibetans living in India. *South Asian Diaspora*, **15**(1) : 81-95. doi:10.1080/19438192.2022.2153211
- De Schutter, O. (2016). *Links Between Migration and Discrimination*. Brussels: European Network of Legal Experts in Gender Equality and Non-discrimination.
- ECRI (2022). *Country Monitoring Reports, Sixth Cycle*. Strasbourg: European Commission against Racism and Intolerance, Council of Europe.
- ENIL (2020). *Independent Living and the EU Structural Funds: Monitoring Report*. Brussels: European Network on Independent Living.
- ERRC (2020). *Nowhere to Live: Roma and the Right to Housing*. Budapest: European Roma Rights Centre.
- ERRC and LDH (2017). *Census of Forced Evictions of Roma in France, 2013-2016*. Budapest and Paris: European Roma Rights Centre and Ligue des droits de l'Homme.
- End, M. (2012). *Antiziganismus in der deutschen*

- Offentlichkeit: Strategien und Mechanismen medialer Kommunikation. Heidelberg: Documentation and Cultural Centre of German Sinti and Roma.
- European Commission (2020). A Union of Equality: EU Roma Strategic Framework for Equality, Inclusion and Participation 2020-2030. COM(2020) 620 final. Brussels.
- European Commission (2023). Report on the Implementation of the EU Roma Strategic Framework. Brussels.
- Eurostat (2024). Living Conditions in Europe: Poverty and Social Exclusion. Luxembourg: Publications Office of the European Union.
- FRA (2022). Roma in 10 European Countries: Main Results, Roma Survey 2021. Vienna: European Union Agency for Fundamental Rights.
- FRA (2025). Roma Survey 2024: Perspectives and Main Results. Vienna: European Union Agency for Fundamental Rights.
- Falcone, J. and Wangchuk, T. (2008). We're not home: Tibetan refugees in India in the twenty-first century. *India Review*, 7(3) : 164-199. doi:10.1080/14736480802255289
- Feldman, I. (2018). Life Lived in Relief: Humanitarian Predicaments and Palestinian Refugee Politics. Oakland: University of California Press.
- Filcak, R. (2012). Living Beyond the Pale: Environmental Justice and the Roma Minority. Budapest: Central European University Press.
- George, A.L. and Bennett, A. (2005). Case Studies and Theory Development in the Social Sciences. Cambridge, MA: MIT Press.
- George, M. (2016). Sri Lankan Tamil refugees in India: conceptual framework of repatriation success. *Refuge*, 32(3) : 73-82. doi:10.25071/1920-7336.40234
- Government of India (2011). Census of India 2011: Provisional Population Totals. New Delhi: Office of the Registrar General.
- Gupta, S. (2019). Indian citizenship for Tibetan refugees: contested terrain. *Economic & Political Weekly*, 54(38) : 39-45.
- Hess, J.M. (2009). *Immigrant Ambassadors: Citizenship and Belonging in the Tibetan Diaspora*. Stanford: Stanford University Press.
- Jayal, N.G. (2013). *Citizenship and Its Discontents: An Indian History*. Cambridge, MA: Harvard University Press.
- Kagan, M. (2011). We live in a country of UNHCR : the UN surrogate state and refugee policy in the Middle East. UNHCR Research Paper No. 201. Geneva: UNHCR.
- Klimova-Alexander, I. (2005). The Romani Voice in World Politics: The United Nations and Non-State Actors. Aldershot: Ashgate.
- Kocze, A. (2012). Civil society, civil involvement and social inclusion of the Roma. Bratislava: UNDP.
- Marshall, T.H. (1950). *Citizenship and Social Class and Other Essays*. Cambridge: Cambridge University Press.
- McConnell, F. (2013). Citizens and refugees: constructing political practice in a Tibetan refugee settlement. *Annals of the Association of American Geographers*, 103(4) : 967-983. doi:10.1080/00045608.2011.628245
- McConnell, F. (2016). *Rehearsing the State: The Political Practices of the Tibetan Government-in-Exile*. Chichester: Wiley-Blackwell.
- McGarry, A. (2010). *Who Speaks for Roma? Political Representation of a Transnational Minority Community*. New York: Continuum.
- Messing, V. (2014). Methodological puzzles of surveying Roma/Gypsy populations. *Ethnicities*, 14(6) : 811-829. doi:10.1177/1468796814542180
- Mezzadra, S. and Neilson, B. (2013). *Border as Method, or, the Multiplication of Labor*. Durham, NC: Duke University Press.
- Migration Policy Institute (2021). *The Tibetan Diaspora: Resettlement, Onward Migration and Community Formation*. Washington, DC: MPI.
- Ministry of External Affairs (2017). *Advisory on Issue of Indian Passports to Tibetans Born in India Between 26 January 1950 and 1 July 1987*. New Delhi: Government of India.
- Ministry of Home Affairs (2014). *Tibetan Rehabilitation Policy 2014*. New Delhi: Government of India.
- Moschel, M. (2012). Is the European Court of Human Rights' case law on anti-Roma violence "beyond reasonable doubt"? *Human Rights Law Review*, 12(3) : 479-507. doi:10.1093/hrlr/ngs018
- Nicolae, V. (2006). Towards a definition of anti-Gypsyism, in Nicolae, V. and Slavik, H. (eds.) *Roma Diplomacy*. New York: International Debate Education Association, 21-30.
- Norbu, D. (2001). *China's Tibet Policy*. Richmond: Curzon Press.
- O'Brien, C. (2016). Civis capitalist sum: class as the new guiding principle of EU free movement rights. *Common Market Law Review*, 53(4) : 937-977. doi:10.54648/COLA2016089

- Pew Research Center (2019). *Minority Groups in Europe: Attitudes toward Roma, Muslims and Jews*. Washington, DC: Pew Research Center.
- Picker, G. (2017). *Racial Cities: Governance and the Segregation of Romani People in Urban Europe*. London: Routledge.
- Planning Commission CTA (2010). *Demographic Survey of Tibetans in Exile 2009*. Dharamsala: Central Tibetan Administration.
- Prost, A. (2006). The problem with “rich refugees”: sponsorship, capital and the informal economy of Tibetan refugees. *Modern Asian Studies*, **40**(1) : 233-253. doi:10.1017/S0026749X06001788
- Ram, M.H. (2014). Europeanized hypocrisy: Roma inclusion and exclusion in Central and Eastern Europe. *J. Ethnopolitics & Minority Issues Europe*, **13**(3) : 15-44.
- Roemer, S. (2008). *The Tibetan Government-in-Exile: Politics at Large*. London: Routledge.
- Roma Civil Monitor (2021). *Synthesis Report on Implementation of National Roma Integration Strategies*. Budapest: Central European University.
- Rostas, I. (2019). *A Task for Sisyphus: Why Europe's Roma Policies Fail*. Budapest: Central European University Press.
- Sadiq, K. (2009). *Paper Citizens: How Illegal Immigrants Acquire Citizenship in Developing Countries*. Oxford: Oxford University Press.
- Samaddar, R. (2020). *The Postcolonial Age of Migration*. London: Routledge.
- Sardelic, J. (2021). *The Fringes of Citizenship: Romani Minorities in Europe and Civic Marginalisation*. Manchester: Manchester University Press.
- Sigona, N. (2011). The governance of Romani people in Italy: discourse, policy and practice. *J. Modern Italian Studies*, **16**(5) : 590-606. doi:10.1080/1354571X.2011.622468
- Singh, D.K. (2010). *Stateless in South Asia: The Chakmas Between Bangladesh and India*. New Delhi: Sage.
- Stewart, M. (2012). *The Gypsy 'Menace': Populism and the New Anti-Gypsy Politics*. London: Hurst.
- Surdu, M. (2016). *Those Who Count: Expert Practices of Roma Classification*. Budapest: Central European University Press.
- Thorat, S. and Newman, K.S. (eds.) (2010). *Blocked by Caste: Economic Discrimination in Modern India*. New Delhi: Oxford University Press.
- Thym, D. (2015). The elusive limits of solidarity: residence rights of and social benefits for economically inactive Union citizens. *Common Market Law Review*, **52**(1) : 17-50. doi:10.54648/COLA2015002
- Tibet Justice Center (2016). *Tibet's Stateless Nationals III: The Status of Tibetan Refugees in India*. Berkeley: Tibet Justice Center.
- Trehan, N. (2001). 'In the name of the Roma? The role of private foundations and NGOs', in Guy, W. (ed.) *Between Past and Future: The Roma of Central and Eastern Europe*. Hatfield: University of Hertfordshire Press, 134-149.
- Valatheeswaran, C. and Rajan, S.I. (2011). Sri Lankan Tamil refugees in India: rehabilitation mechanisms, livelihood strategies and lasting solutions. *Refugee Survey Quarterly*, **30**(2) : 24-44. doi:10.1093/rsq/hdr002
- Validity Foundation (2021). *Cash for Care? EU Funds and Institutionalisation in Central and Eastern Europe*. Budapest: Validity Foundation.
- Vermeersch, P. (2006). *The Romani Movement: Minority Politics and Ethnic Mobilization in Contemporary Central Europe*. New York: Berghahn.
- Vermeersch, P. (2012). Reframing the Roma: EU initiatives and the politics of reinterpretation. *J. Ethnic & Migration Studies*, **38**(8) : 1195-1212. doi:10.1080/1369183X.2012.689175
- Vincze, E. (2013). Socio-spatial marginality of Roma as form of intersectional injustice. *Studia UBB Sociologia*, **58**(2) : 217-242.
- Yeh, E.T. and Lama, K.T. (2006). Hip-hop gangsta or most deserving of victims? Transnational migrant identities and the paradox of Tibetan racialization in the USA. *Environment & Planning A*, **38**(5) : 809-829. doi:10.1068/a37218
- Yildiz, C. and De Genova, N. (2018). Un/Free mobility: Roma migrants in the European Union. *Social Identities*, **24**(4) : 425-441. doi:10.1080/13504630.2017.1335819
- van Baar, H. (2011). *The European Roma: Minority Representation, Memory and the Limits of Transnational Governmentality*. Amsterdam: University of Amsterdam.
- van Baar, H. (2017). Evictability and the biopolitical bordering of Europe. *Antipode*, **49**(1) : 212-230. doi:10.1111/anti.12260.
