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The Invisible Impact of Frozen Conflicts:
A Case Study of Foreign Domestic Workers in Cyprus

Forthcoming in Ethnopolitics

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Abstract

Foreign domestic workers are vulnerable everywhere in the world but are particularly so in frozen conflict societies. The article describes their poor living and working conditions in the Republic of Cyprus and argues that these have been exacerbated by the social consequences of the frozen conflict on the island. It focuses on three social consequences of the frozen conflict, namely that it has deprioritised the feminist agenda, normalised nationalist narratives and created a skewed understanding of human rights. Combined, these explain why protecting the rights of foreign domestic workers in Cyprus is even less of a priority than elsewhere.

Keywords: frozen conflict, foreign domestic worker, Cyprus

1. Introduction

Although the literature on frozen conflicts has, over the last 15 years, developed considerably, a knowledge gap exists when seeking to understand the costs of frozen conflicts to ‘outsiders’ living within these societies – those that do not identify with any of the previously warring parties and whose interests are, therefore, overshadowed by the more vocal demands of the dominant communities. The article begins addressing this gap by using as a case study one such group of outsiders, namely foreign domestic workers (FDW) in the Republic of Cyprus (RoC or Republic). A culmination of several factors makes FDW vulnerable everywhere in the world: among these, are their gender, their migrant status and the type of work they perform. At the same time however, the salience of the frozen conflict within the Greek Cypriot society has an impact on governmental decision-making and provides an additional explanation for the substandard protection of FDW’s human rights.

The article explores three characteristics of frozen conflicts. These are that they are concerned with unresolved core issues that are perceived to be *zero-sum*; that relate to *identity politics*; and that are *central* to the lives of those living within the society. In turn, these characteristics give rise to costs experienced within frozen conflict societies (Rosler et al., 2021): they make these societies be in a constantly securitised state; increase the salience of identity markers, such as language and religion; and give rise to societal beliefs, such as the group’s righteousness and victimisation. Building on these, the article explains how the characteristics of frozen conflicts and the costs associated with them affect governmental decision-making and contribute to FDW’s poor living and working conditions. It argues that increased securitisation has deprioritised the feminist agenda, which in turn, has had a disproportionately negative impact on FDW, the vast majority of whom are women. The increased salience of identity markers has provided a fertile ground for the flourishing of nationalist speech and policies. These primarily target Turks and Turkish Cypriots, but their proliferation has also normalised hostility against others, such as FDW, who are perceived as sharing the out-group’s characteristics. Finally, societal beliefs about the Greek Cypriots’ victimisation have skewed the public’s understanding of human rights. This has, in turn, been institutionalised and is most starkly observed in the sphere of human rights education. The skewed perception of human rights has detracted attention from, and failed to empower, contemporary marginalised groups, including FDW.

The article focuses on FDW in the RoC for three reasons. First, Cyprus offers a typical example of a frozen conflict, ‘[p]erhaps the most familiar case ... in modern international politics’ (Ker-Lindsay, 2012, p. 39). Understanding the impact of the frozen conflict on FDW in the RoC and the factors that contribute to this, can help explain their experiences in other similar contexts, including Transnistria, Abkhazia, South Ossetia, Nagorno-Karabakh, Kosovo, Taiwan and Somaliland (Berg and Toomla, 2009). This analysis can also inform findings in societies that are similar to Cyprus, but are not technically frozen conflicts, such as Israel (Raijman et al., 2003). Second, the RoC was chosen as an illustrative case study of the problem because, as discussed in Section 2 below, the vulnerability of FDW in the country is particularly acute.

The third reason for choosing the RoC as a case study is a methodological one. The RoC has been the subject of research on both the costs of the frozen conflict and the rights of FDW in the country. The two strands of research broadly revolve around similar insights – among them, that feminism, nationalism and a human rights culture are impacted by the frozen conflict on the one hand and are important factors that affect the rights of FDW, on the other. Despite these common conclusions, however, the effect of the frozen conflict on FDW in the RoC has never been the subject of academic debate. Making the RoC the focus of this analysis was methodologically interesting therefore, because it allowed the merging and reinterpretation of two sets of sources that have not been explored together so far. The first set, focusing on the working and living conditions of FDW, consists of laws and policies of the Republic, read alongside a series of reports by the Ombudsman and international organisations. The second includes secondary sources on the definition, characteristics and costs of the frozen conflict on those who experience it on an everyday basis. The combination of the two sets of sources makes it possible to argue and offer evidence for the fact that while FDW are vulnerable everywhere, they face additional challenges in frozen conflict societies, *precisely because of the conflict's ongoing presence*.

The argument is divided in four parts. Section 2 provides brief background information about the living and working conditions of FDW in Cyprus. Section 3 engages in a literature review of, and explains what is meant by, frozen conflicts. Section 4 identifies their characteristics and explains the costs these create in the societies where they fester. Section 5 applies this analysis to the specific context of FDW in the RoC.

2. The living and working conditions of FDW in the RoC

The compounding effect of a range of factors makes FDW vulnerable everywhere, not just in the RoC (EU Agency for Fundamental Rights, 2017). FDW are regularly excluded from the scope of labour laws or are covered by less favourable legislation, reflected in the fact that internationally, they work for more hours and get paid less than the average worker (ILO, 2013). Factors that explain this vulnerability relate to the identity of FDW, and in particular that they are primarily women,¹ migrants and often face language barriers in their host country (EU Agency for Fundamental Rights, 2011, p. 16). This is further exacerbated by the fact that domestic work is underappreciated, invisible and unpaid in societies all over the world (Ombudsman, 2013, pp. 3-4). FDW often work and reside in their employers' private homes, outside the public's eye, which makes it more difficult for the state to identify violations of their rights and respond to them (EU Agency for Fundamental Rights, 2011, p. 40). Moreover, they tend to do so alone – each in a separate home – which creates challenges in proving allegations of abuse and organising themselves collectively (Ombudsman, 2013, pp. 3-4). Finally, FDW have, in general, limited rights awareness, and even in cases where this is present, they rarely voice their complaints, due to concerns that it could cost them their job or working visa (EU Agency for Fundamental Rights, 2011, p. 42).

The presence of a well-developed legal framework that regulates the working conditions of FDW can, if implemented correctly, respond to at least some of the factors that accentuate their vulnerability. There are two international documents that can set the backbone for this – the

International Convention on the Protection of Migrant Workers and Members of their Families (1990) and the ILO Convention Concerning Decent Working Conditions for Domestic Workers (2011). The RoC has not signed or ratified either of them. Shortly after the drafting of the 2011 Convention, the government identified, although did not make publicly available, the reasons why this could not be ratified by the Republic (Savva, 2019). The question of ratification was briefly revisited in 2016, but discussions fizzled out again soon after (Savva, 2019). In 2019, a serial killer who had sexually abused and murdered five migrant women workers and two of their daughters was arrested. In the public outcry that followed, the RoC committed to ratifying the Convention, but almost three years later, this has not yet happened.² Thus, inadequate legal protections exist in a country where, as of July 2019, there were just over 19,000 registered FDW, constituting about 50% of all third-country nationals.³

The Republic allows these individuals to enter the country only through a FDW visa, which grants the visa-holder very limited and specific rights. A FDW's arrival to the RoC is sponsored by her future employer to whom she is bound for the duration of her stay; with few exceptions, if she loses her employment, she also loses the right to legally reside in the country (Ombudsman, 2019, pp. 20-21). Before commencing work, a FDW must sign a government-drafted contract of employment. This stipulates that she should work for 42 hours per week and that she is responsible for 'housework performed in the Employer's primary residence and/or secondary residence', but very little beyond that. The contract makes no reference to the type of work that the FDW should be expected to perform, breaks within the day or the payment of overtime.⁴ In practice, even the few protections mentioned in the contract are not complied with. The RoC Ombudsman (2013; 2019) has published two damning reports warning that the living and working conditions experienced by FDW are in violation of human rights standards. These findings were confirmed in a 2020 empirical study of 150 FDW, in which participants reported that they work 40% more than what their contract provides (Ombudsman & Hadjigeorgiou, 2020). A third of the respondents stated that they are not always paid or are not always paid the full amount they are owed and, to a different question, a third said that they are not always paid on time. Finally, 67% clean more than one house, while 33% work every day instead of six days per week (both instances are in violation of their contract) (Ombudsman & Hadjigeorgiou, 2020).

Although the EU Fundamental Rights Agency (2011; 2017) has compared the protection of FDW's rights in different countries, the RoC is not one of the case studies it has examined. Nevertheless, a range of other sources lead to the conclusion that the vulnerability of this group of workers is particularly acute in Cyprus. The Migrant Integration Policy Index 2020 ranks the Republic 42nd out of the 52 countries that participated to the survey in terms of its integration policies, with a score that is well below that of the European average.⁵ Further, the legal framework that regulates FDW's rights in the RoC has been described as 'the paradigmatic regime which allows the employers of migrants to have additional means of control over labour' and compares unfavourably with that of other Mediterranean countries, such as Spain (Pavlou, 2016, p. 155). International human rights organisations have strongly criticised aspects of this framework, such as that a FDW's stay in the RoC is controlled by a single employer and that she is allowed to change a maximum of two employers and only after

she has been in the country for six months (CERD, 2017, pp. 4-5; CEDAW, 2018, pp. 13-14; GRETA, 2020, p. 36). The Ombudsman (2019, p. 25) has warned that the inadequate protections of FDW in the country have

been internalised by the general public as something ‘natural’ and necessary. [T]he systematic violation of their labour rights, and many times their fundamental human rights, becomes acceptable – to the point of being invisible – even to those employers who have no such intention.

One explanation for this inadequate legal framework is that FDW are virtually invisible in the eyes of the RoC. Illustrative of this is the attention, or lack thereof, paid to FDW by the state itself. The recruitment of all immigrant workers involves the Ministry of Labour, yet FDW are, exceptionally, the concern of the Migration Department, under the Ministry of the Interior (Ombudsman, 2013, p. 9). In 2010, the Council of Ministers sought to address this anomaly and ordered the shifting of responsibility from the Migration Department to the Ministry of Labour. 12 years on, implementation of this decision is still pending (Ombudsman & Hadjigeorgiou, 2020, p. 32). An additional example of the state’s inattention towards FDW concerns the statements of the President of the Republic in the aftermath of the serial killing investigations. President Anastasiades announced the establishment of ‘a special department within the Ombudsman Office, which would investigate every complaint relating to FDW’s living conditions in Cyprus’ (Eliade, 2019). He was seemingly unaware of the fact that the Ombudsman already has this exact mandate and that after each investigation, a report is sent to the Council of Ministers, which he presides over, for further reflection and discussion.

The practical implications of the RoC’s inattention towards FDW become most obvious in the context of the government-drafted contract of employment. A standard contract for all migrant workers had been prepared by the Ministry of Labour in 1991. This was amended by the Migration Department to fit the specific context of domestic work but was never sent back to the Ministry of Labour for final approval (Ombudsman, 2013, p. 10). The document was used, essentially unamended, for almost 30 years.⁶ Even when a revised draft was eventually adopted in 2019, this attracted no heed from political actors, no media coverage and was not the subject of any public debate. Several months later, the Minister of Interior was asked why the new contract does not distinguish between FDW who are employed as cleaners and those who work as carers. He readily agreed that such a distinction was appropriate, concluding that ‘[t]his is a very simple legislative amendment, just three lines. By the end of the year [i.e. 2019], it should be voted on’ (Press and Information Office, 2019). Three years later, no steps appear to have been taken in this direction. Finally, the lack of thought that has gone in the implementation of the employment contract, which is itself illustrative of the inattention paid to FDW, has rendered some of its safeguards ineffective. For instance, Article 2.1.A stipulates that FDW should not work more than 42 hours per week and that ‘[t]he Employer shall be obliged to keep record of the working hours.’ The contract does not explain what the employer is to do with these records, who s/he should disclose them to and for what purpose; in fact, no government department appears to have the mandate to collect, let alone act upon, such information. The rest of the article argues that this lack of thought and attention to FDW is partly attributed to the continuation of the frozen conflict in Cyprus.

3. Understanding frozen conflicts

Over the last 15 years, there have been significant developments in the research on frozen conflicts and, in particular, on how they can be resolved. For instance, Loizides (2015) has focused on strategies that can be adopted before and during negotiations, which can help produce an agreement and put an end to the status quo, while Pokalova (2014) has explored the conditions that prevent the parties to a frozen conflict from reaching a comprehensive settlement. Smetana and Ludvik (2019) hypothesised how frozen conflicts end, while others debated what makes them hard to resolve. Kolstø (2006) argued that the existence of a *de facto* state is predicated on the presence of a patron state;⁷ Souleimanov (2013) pointed to elite discourse as an important explanation for the longevity of frozen conflicts and Hassner (2007) contended that the passage of time itself makes frozen conflicts relating to territorial disputes even more intractable. Additionally, research has been conducted on the different political actors that often emerge from frozen conflicts, namely the *de facto* states that they often give rise to and the rump states from which they secede.⁸ Thus, there is now a growing literature on the nature, prospects and limitations of *de facto* states (Pegg, 2017), the mechanisms through which the international community engages with them (Caspersen, 2018; Hadjigeorgiou, 2016; Berg and Toomla, 2009; Ker-Lindsay, 2018) and the diplomatic channels likely to be adopted by rump states to keep them marginalised (Ker-Lindsay, 2012).

These contributions notwithstanding, there is much disagreement on what is meant by ‘frozen conflicts’. For instance, Jolicoeur and Campana (2009) argue that frozen conflicts are the result of violent secessionist movements in the context of the dismemberment of a communist state. The secessionist movement must use violence against the rump state, the violence must be suspended by a ceasefire and in its aftermath, a *de facto* state not recognised by the international community should be created. Alternatively, Grant (2017) believes that a frozen conflict exists when there is an armed hostility between a state and separatists, which results in a change in effective control of territory. The separatists must be making a self-determination claim, must be divided from the rump state by stable lines of separation and the settlement process between the two must be sporadic and inconclusive. Key for Grant is the requirement that the separatist entity has been recognised by no one, since after recognition by even one state, the conflict is no longer frozen. Finally, Clancy and Nagle (2009) define frozen conflicts as violent ethno-political conflicts over secession, which result in the establishment of a *de facto* state that has been recognised by neither the international community, nor the state from which it has seceded.

One limitation of these definitions is that they are underinclusive, leaving conflicts that could be characterised as ‘frozen’ outside of their scope. Jolicoeur’s and Campana’s emphasis on the communist context arbitrarily excludes disputes such as those between Morocco and Western Sahara (Fregoso Chavez & Zivkovic, 2012; Fernandez-Molina, 2019), or India and Pakistan in relation to Kashmir (Bose, 2007). Grant’s insistence that recognition of the separatist entity by even one state renders the conflict non-frozen, rejects classic examples of frozen conflicts such as Cyprus, Abkhazia and South Ossetia, which have been recognised by one or a handful of states. And while Clancy’s and Nagle’s definition is broader than the other two, it still

dismisses contexts that have been understood as (developing) frozen conflicts, like Crimea, which has been annexed by Russia, rather than declaring itself an independent state (International Crisis Group, 2019; de Waal, 2018).

A definition that responds to this criticism is that provided by Smetana and Ludvik (2019), which identifies four characteristics of frozen conflicts. These are, first, that they are international conflicts with the opposing sites being states or state-like entities. The parties might both be recognised states (as in between Afghanistan and Pakistan over the Durand Line) or a recognised and a de facto state (as in between Israel and Palestine). Second, they are protracted, post-war conflict processes in that they always start with a war and remain untransformed for decades. Third, they are characterised by the absence of stable peace between the two sides and fourth, core issues between the opposing sides remain unresolved. These characteristics are sufficiently broad to encapsulate frozen conflicts that have been arbitrarily excluded by other definitions, but also specific enough to distinguish them from related concepts, such as ‘enduring rivalries’,⁹ ‘strategic rivalries’¹⁰ or ‘protracted conflicts’.¹¹

Under Smetana’s and Lutvik’s definition, Cyprus is a paradigm example of a frozen conflict society. Section 2 of the 1960 RoC Constitution declares that its citizenry consists of individuals who belong either to the ‘Greek’ or the ‘Turkish’ community. It is between these two communities and their respective motherlands that the conflict has been waged, thus satisfying the first limb of the definition. Disagreements between them led to the eruption of inter-communal violence in 1963 and a military invasion by Turkey in 1974, as under the second limb of the definition. As a result of the invasion, Greek Cypriots fled to the south, which remained under the effective control of the RoC, and Turkish Cypriots trekked to the north, which has since been under the effective control of Turkey, with the two communities remaining largely segregated until today.¹² It is this physical separation between Cypriots, and the ongoing presence of the United Nations Peacekeeping Force in Cyprus (UNFICYP) that is maintaining non-violence, rather than the development of a more stable peace. Finally, in 2004, the two sides came close to, but ultimately failed to reach a comprehensive peace settlement. Since then, they have continued engaging in a staccato of negotiations, with the core issues between them remaining unresolved.¹³ It is these unresolved issues that create costs for the frozen conflict society.

4. The costs of frozen conflicts

The costs of frozen conflicts to the parties that *directly* participate to them have been subject to some academic discussion (Galtung, 1990; Adamides & Constantinou, 2011; Bar-Tal, 2013)). Yet, there has been comparatively little analysis of how these costs are experienced by those who are members of the society, but do not identify as parties to the conflict as such and are therefore, seemingly disconnected from it.¹⁴ Perhaps the most insightful analysis of the rights of ‘outsiders’ living in frozen conflict contexts has been delivered by Demetriou (2018) through her concept of ‘minor losses’. Demetriou argues that the frozen conflict in Cyprus has given rise to, but at the same time hidden, several minor losses, or costs, that are being treated as insignificant when compared to the more traditional concerns of the two communities. These minor losses ‘have not been incidental to the conflict – they have been shaped by it’

(Demetriou, 2018, p. 2). They exist because the architecture of the conflict relies on a series of idealised categories of people – citizens, Greek Cypriots, Turkish Cypriots, refugees – and therefore excludes, thus creating losses for, those who are not wholly defined by these categories. Such losses materialise when individuals do not neatly fall within a strict legal definition of a specific category of people¹⁵ or, for those that do, when they do not conform with societal expectations about how members of their group should behave.¹⁶ In other instances, minor losses are accrued by those whose (ethnic) identity is not one of the main antagonistic identities to the conflict and who are therefore, unable to seek protection of their interests through their community.¹⁷ Yet, while Demetriou's argument about the existence of minor losses is compelling, she does not seek to explain *why* these are so common in Cyprus.

This section argues that minor losses or costs are linked to characteristics of the unresolved core issues that form part of the definition of frozen conflicts. Core issues that remain unresolved and fuel frozen conflicts have three common characteristics: they are (a) perceived to be zero-sum; (b) total; and (c) central (Bar-Tal, 2007, p. 1435). 'Zero-sum' conveys the belief among parties that a loss by the one is a gain by the other, which makes compromise unlikely. Core issues that are 'total' tend to touch on a plurality of issues and are not concerned with a simple, one-dimensional disagreement. They are often about territory disputes, disagreements about the distribution of resources, the state of the economy and, crucially, the protection and preservation of the parties' identity (reflected in their culture, language, religion, and history).¹⁸ Finally, the characterisation of core issues as 'central' suggests that members of the society are constantly and continuously preoccupied with them. Debates about them are not just peripheral issues to the political and personal lives of those living in the frozen conflict society. Rather, they shape individuals' decisions of who to trust, vote for and support, employ and work for, or interact with and marry. This centrality of core issues renders them, even after the ceasefire, salient and potent instruments of mobilisation in the domestic politics of the frozen conflict society (Smetana and Ludvik, 2019, p. 5; Yakinthou & Polili, 2010).

It is possible to make a general argument about the costs of frozen conflicts because although the context of each conflict is unique, the dynamics that persist in all of them are arguably very similar (Bar-Tal, 2007; Bar-Tal, 2013). Thus, the crust of the argument is that the characteristics of unresolved core issues – namely the fact that they are zero sum, total and central – create consequences with often hidden, but nevertheless, real costs for those living within the frozen conflict society. Specifically, the fact that the conflict is perceived to be zero-sum raises the stakes of what will be lost if the other side is allowed even a single win and, therefore, further securitizes the conflict. Securitization is the process through which a threat is presented as being so acute and a response to it is so urgent, that an extraordinary measure to address it, which would not normally be considered acceptable, is now justified (Buzan et al., 1998). Since in frozen conflict societies, core issues are perceived in zero-sum terms, losing even objectively insignificant arguments, poses an existential threat that must be avoided at all costs.¹⁹ Although all societies experience securitizing ad hoc events, because in frozen conflict societies core issues are both zero-sum and unresolved, existential threats are always looming and securitisation is ongoing all the time (Adamides, 2020). This creates costs because the need to respond to constantly securitized threats diverts the society's attention and resources away

from other socially important goals (Adamides, 2018). As the following section explains, one socially important goal that has been deprioritised because of the frozen conflict's securitizing effect is the need to empower women; in turn, this has had a disproportionate effect on FDW, 98% of whom are female.²⁰

The second characteristic of core issues that remain unresolved in frozen conflicts is that they are total. As a consequence of core issues being concerned with, among others, the preservation of a group's identity, the identity markers that help distinguish one group from the other acquire added significance. Notably, what is important is not that the parties to the conflict have objectively very different identity markers; in fact, often the most vicious conflicts have been fought among groups that, to an outside observer, have very few differences between them (Triandafyllidou, 1998, p. 599). Rather, identity markers are usually relational; they acquire their significance because one party to the conflict defines itself by reference to what the other is not (Miller, 2001, p. 303; Hadjigeorgiou, 2021). As the next section argues, the increased salience of identity markers, such as language and religion, is socially costly. It creates a fertile ground for the flourishing of nationalist views, which, in turn, has an impact on FDW, all of whom are third-country nationals that do not share the majority's identity.

Finally, the third characteristic of core issues – that they are central to the lives of those living in the frozen conflict society – means that ongoing debates about them are 'exhausting, demanding, stressful' and for societies to be able to cope, they must adopt 'major psychological infra-structure' (Bar-Tal & Bennink, 2004, p. 23). This infrastructure encourages frozen conflict participants to internalise societal beliefs, such as that the in-group is the victim, its security is constantly under threat and that the out-group lacks legitimacy (Bar-Tal, 1998), which ultimately shape the 'ethos' of the frozen conflict society as a whole (Bar-Tal, 2007).²¹ Such beliefs are widely shared among the public and eventually institutionalised; they are openly endorsed by political actors and the average citizen, are used to justify decisions of a personal or political nature and are generally accepted as 'the truth' (Bar-Tal, 2007). One important way in which such societal beliefs are institutionalised is through the educational system. Thus, while liberal educational systems generally focus on the universal nature of human rights, those in frozen conflict societies are likely to use human rights language to push a more nationalist agenda. The following section suggests that this shift is detrimental to FDW whose rights and needs are never discussed in the classroom, leaving students desensitised to the need to pay them the necessary respect they deserve. The connections between the characteristics of unresolved core issues, their consequences and costs within the frozen conflict society are summarised in Figure 1 below.

5. Applying the costs of frozen conflicts to FDW in the RoC

This paper does not make the argument that FDW are mistreated only in frozen conflict societies. The same factors that render them vulnerable in the RoC are also present elsewhere. Protecting the rights of FDW has generally been a low priority for feminists. One explanation for this is that the work done by FDW today, was historically unregulated and unpaid, as it was the responsibility of the woman in each household (Cox, 2012). When this was outsourced to FDW, the incentives for starting to treat domestic work like any other profession were simply

not there. Local women joined the workforce, but neither patriarchal expectations that women are responsible for domestic tasks, nor professional expectations that the employee should not have additional responsibilities at home, were challenged (Gregoriou, 2008). This was especially true in societies that had no, or limited, institutionalised support structures for the provision of care, such as subsidised retirement homes or public nurseries. Eastern Mediterranean countries are a prime example of this (Bettio et al., 2006). In Greek dual-earner households with a child less than three years old, the caring responsibilities of the working mother are tenfold compared to the caring responsibilities of the working father (Lyberaki, 2011, p. 117). In such contexts, if the woman also has a full-time job, outsourcing domestic tasks becomes almost a necessity. However, her replacement must be flexible enough to do this job to a similar level and cost as the woman of the house once did. With these considerations in mind, society as a whole (among them the feminists who often come to rely on FDW's services) have no incentive to make FDW less vulnerable, and therefore less flexible or more expensive.

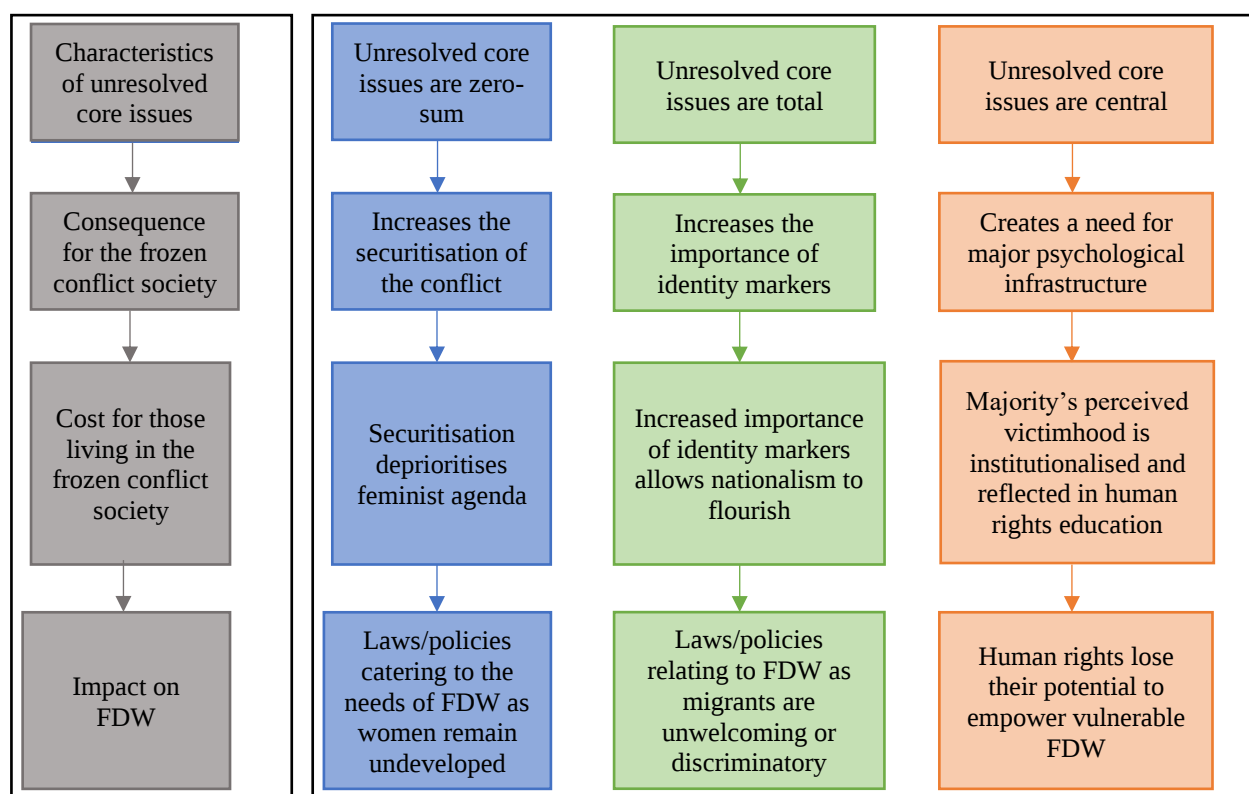


Figure 1 – The impact of the frozen conflict on FDW

Flourishing nationalist narratives and skewed understandings of human rights are also present in societies that are not experiencing frozen conflicts. It has been documented in the literature that while employment regimes afford varying levels of protection to FDW in different jurisdictions, immigration rules are restrictive everywhere (Murphy, 2013). These immigration rules, which are justified by nationalist narratives, typically render illusory the employment law protections that are technically available to precarious migrant workers (Anderson, 2010). Similarly, the EU Agency for Fundamental Rights (2015, p. 53) has warned of a problematic human rights culture towards FDW. Referring to the whole of Europe, it criticised the

widespread exploitation of these workers, which has in turn, normalised the human rights violations they experience. Thus, factors that undermine the living and working conditions of FDW are present all over the world. What makes frozen conflict societies different is the *degree* to which these factors are present, with the argument being that the frozen conflict itself *exacerbates* their impact. Evidence of this is provided in the three subsections below.

A. Deprioritisation of the feminist agenda

The securitised nature of the frozen conflict in the RoC has shifted attention, resources and expertise away from other socially important goals, including the need to empower women (Kamenou, 2012). It has been well-documented in the literature that over the last decades, the national issue has taken priority over feminist demands for greater empowerment (Demetriou & Hadjipavlou, 2020; Vassiliadou, 2002). The relative marginalisation of women in Greek Cypriot society is reflected in the fact that the Republic ranks 21st out of the 27 EU Member States in the Gender Equality Index, scoring 56.9 out of 100 points, 11 points lower than the European average.²² This is especially so in the domain of power, in which the RoC has scored only 29.8 percentage points and was ranked 24th. The problem though, does not only lie in the fact that women are grossly underrepresented in both public and private decision-making bodies (M. Angeli, 2020) as well as the media (M. Angeli, 2015). It also has to do with the roles adopted by those women who have peaked through the glass ceiling and the way they have opted to utilise this power. Most women organisations in the Republic are branches of mainstream political parties that are headed and exclusively controlled by men and whose main concern is to take a stance on the national issue. Often, to the women branches of these parties, feminist considerations are an afterthought, with women becoming “‘objectified” as numbers to be tackled and “‘improved”, and [being] irrelevant to debates on the parties’ political line.” (Vassiliadou, 2002, p. 464)

Even women who are not affiliated with specific political parties have tended to mobilise around the national cause and ignore feminist concerns that deviate from their respective objectives with regards the Cyprus issue (Agathangelou, 2003). Most women involved in politics or civil society, therefore, have used their power to address issues that relate to the frozen conflict, rather than promote a more feminist agenda. As one activist put it 20 years ago, ‘[i]n the case of Cyprus, there is, in fact, a distinct lack of feminist activism or mobilization of women concerning issues other than the ethnic conflict’ (Vassiliadou, 2002, p. 463). Not much has changed since then, as ‘[f]eminism is still a dirty word here. [...] One becomes quaint talking about women’s involvement because the response will be “let’s sort out the Greek-Cypriot-Turkish-Cypriot thing first, and then we’ll sort out the gender thing”’ (Kamenou, 2019, p. 360). This was perhaps most aptly illustrated in a recent UN-supported event, intended to empower the women of the island. After a long list of Greek and Turkish Cypriot women were given the floor, the co-founder of Obreras Empowered, an association that promotes the rights of FDW in the RoC, also had an opportunity to speak. This was the moment many feminists chose to leave the room, as the topic of discussion stopped being one they were interested in (Papastavrou-Faustmann, 2019). Hence the frozen conflict has undercut feminist efforts in three interrelated ways: it has deprioritised women’s issues as a whole; it has empowered only a sub-category of women who come from specific socio-political and ideological backgrounds;

and who, in turn, have tended to overlook those whose identity and interests are not aligned with the national narrative they have adopted.

Arguably, the frozen conflict's deprioritisation of the feminist agenda has stopped important conversations from taking place and, in turn, undermined the rights of FDW, the vast majority of whom are women. For instance, the FDW employment contract refers to the possibility of launching a complaint against one's employer but provides no additional information about what this actually means. It transpires that while FDW can indeed complain, as long as the complaint is being investigated, a process that can take several months, they are not allowed to work and are not eligible to receive state support.²³ Moreover, the authorities are, in theory, keeping records of abusive employers and stopping them from sponsoring the entry of FDW in the future, but no such list appears to exist. These lacunae in the (enforcement of the) law have a disproportionate impact on women, who are much more likely to be victims of violence. Thus, a FDW can complain against her employer, but lose all her earnings, which would make her more likely to resort by necessity to other income-earning activities, such as survival sex. Unsurprisingly, few take this option, with 75% of FDW stating that they would not inform the authorities if they had been physically or sexually abused (Ombudsman & Hadjigeorgiou, 2020). This state of affairs leaves FDW with only unsatisfactory options: they can either stay with their abusive employer, or leave their employment and become irregular migrants, thus receiving even less protection from the law (EU Agency for Fundamental Rights, 2011). Despite its life and death implications, this issue has *never* been the subject of a public debate.

B. Normalisation of nationalist speech and policies

The increased salience of identity markers within the frozen conflict society feeds on and perpetuates a nationalist sentiment (Brubaker, 2009). If nationalism is equated to patriotism, defined as thinking highly of one's culture, it is a harmless and even beneficial characteristic of the individual and the society they are a member of (de Figueiredo & Elkins, 2003). Conversely, those who describe themselves as nationalists and by that they mean that their culture or identity is superior to others', are more likely to exhibit negative behaviour (de Figueiredo & Elkins, 2003; Anthias, 1992). Considering that the driving force behind the frozen conflict is an antagonism between different communities, manifesting in beliefs that the in-group deserves to be victorious over the out-group, it is the latter and more dangerous definition of nationalism that prevails. Empirical work conducted by Stevens et al (2014) in RoC schools confirms these theoretical insights: students who consider their ethnicity as central to their identity and believe that their group is culturally superior to the rest, are more likely to show negative perceptions towards ethnic and racial out-groups.

While nationalist feelings in the RoC are mostly directed towards Turks or Turkish Cypriots, the wide acceptance and normalisation of such beliefs has implications for other groups as well. If individuals are perceived as having characteristics of the out-group, even if they are not members of that group as such, they are considered threatening by default. Similarly, if their characteristics are different from those of both the in-group and the out-group, they are again unwelcome because, in the antagonistic identity environment that the frozen conflict cultivates, it is almost impossible to make space for 'surplus identities' (Constantinou, 2009). Put simply,

in such zero-sum identity contexts, whoever is not with us, is necessarily against us; and if they are against us, they do not deserve to be protected in the same way we are. In the words of the first Attorney-General of the Republic, Cypriot nationals who do not identify as Greek or Turkish, and therefore do not have a community to protect them, are ‘second-class citizens’ (cited in Constantinou, 2009, p. 366). Extrapolating, the status of non-citizens, such as FDW who are in the RoC only temporarily and to do the work that first-class citizens refuse to, is likely to be even lower.

Thus, while nationalist narratives are most vocally directed against Turks or Turkish Cypriots, ‘[t]he Turks, being an Eastern Other, in the Greek Cypriot nationalist imagination often lend their cultural negativity to other kinds of Easterners, such as Sri Lankans and Filipinos’ (Spyrou, 2009, p. 160). In the words of a 10-year-old Greek Cypriot boy quoted by Spyrou (2006, p. 101), ‘the Turks, being uncivilized as they are, have a mentality that is different: it would not bother them at all to kill, to loot a country. . . in general their mentality is very Asian’. The expansion of the threatening out-group to cover all Asians and not only Turks, has not happened accidentally in the Republic; rather, it is the result of frequently asserted connections between the (originally threatening) Turk and the (now also threatening Asian) migrant. Such links are often drawn when government officials declare that most migrants reach the RoC by getting to the ‘Turkish Republic of Northern Cyprus’ (‘TRNC’) and illegally crossing the UN buffer zone that divides it from the areas under the control of the Republic.²⁴ At the same time, the opposite allegation is also made, namely that FDW often come to the Republic legally, but leave their employers in order to seek better employment opportunities in the ‘TRNC’ (Hadjivasilis, 2020). No discussion ever takes place as to why someone in legal employment in the RoC would risk leaving her house and job for a much more uncertain future in a non-recognised state. Instead, what lingers is a sense that by crossing the buffer zone, FDW *somehow* undermine the legitimacy of the Republic.²⁵ The accuracy or not of the assertion that migrants, among them FDW, pose a threat to the RoC is irrelevant; its repetition is in itself sufficient to limit the protections afforded to those who do not look like the Greek Cypriot majority. Perhaps the starkest illustration of this was an admission by the police after the 2019 serial killing investigations that when an employer reports the disappearance of a FDW, this is not investigated *at all* because of an assumption that she has fled to the ‘TRNC’ (France24, 2020; Politis News, 14 April 2021). The admission led to the resignation of the then Minister of Justice, yet allegedly, this remains the police’s practice even today.²⁶

Another strategy that portrays migrants as a threat to the RoC is their dubious association with Turkish settlers. Turkish settlers were brought, or encouraged to emigrate, to the areas not under the effective control of the Republic from mainland Turkey and are considered an anathema by most Greek Cypriots who view them as part of Turkey’s plan to change the island’s demographics (*Mavrides & Cypriots Against Turkish War Crimes v. The Republic of Turkey*, 2014). One of the most divisive issues in the negotiations for a comprehensive peace settlement is the number of Turkish settlers that will remain in Cyprus following the reunification of the island. In 2004, when the two sides came close to a settlement, they agreed that 45,000 Turkish settlers would be naturalised and allowed to remain in Cyprus.²⁷ Although this was never explicitly admitted, individuals involved in the negotiations have hinted that

45,000 reflects the number of third-country nationals, half of whom are FDW, that currently reside in the RoC (Demetriou, 2018, p. 159). Thus, although FDW are in no way Turkish in their identity, they are unwanted and dangerous by association: their presence in the RoC creates a future threat, to which Greek Cypriots must respond today. The ex-Minister of the Interior alluded to this when, referring to migrants and asylum seekers, he declared that ‘there is a danger that in [the Republic of] Cyprus, a Muslim minority will be created [...] There are settlers in the free areas’. (Polydourou, 2019)

Concerns that high numbers of third-country nationals will have a detrimental effect on its negotiating power have arguably informed the government’s decision to classify FDW as ‘temporary workers’. The Ministry of Labour (2007, p. 7) explained that

the introduction of foreign workers [in the 1990s] was only acceptable as a temporary measure in limited numbers and occupations where their immediate cover by [Greek] Cypriots was not possible. At the same time, long-term measures would be adopted to address these gaps, with the number one priority being the repatriation of [Greek] Cypriots from abroad, which would serve, at the same time, the population policy.

While the statement does not mention the Cyprus problem as such, the reference to the ‘population policy’ would be readily understood by Greek Cypriots to imply exactly that. It stems from the Greek Cypriot position that their numerical superiority compared to that of Turkish Cypriots, should result in greater representation in federal institutions (UN Secretary-General, 27 May 2003, p. 5). A dilution of the Greek Cypriot majority through the permanent acceptance of third-country nationals in its ranks, in contravention to the ‘population policy’, would undermine this argument.²⁸

The problem with labelling FDW as ‘temporary’ (in order to protect the in-group’s identity and political power) is that it allows the government to afford sub-standard rights protection to them. Two examples illustrate this. The first concerns FDW’s access to permanent residency, which is a right afforded to all third-country nationals who have been working in an EU Member State for five years or more.²⁹ FDW are issued a four-year visa, which they can renew twice for a period of 12 months, while many also fall within the exceptions that allow them to stay in the country for even longer (Ombudsman, 2019, p. 12). Although they are technically eligible for permanent residency, the Supreme Court has (questionably³⁰) held that since FDW are told from the outset that their visa is granted on a temporary basis, they should not form legitimate expectations that they can remain in the Republic for longer.³¹ In practice, their ineligibility for permanent residency means that FDW can never hope to be employed in a different sector, will always be experiencing insecurity as precarious migrant workers and, crucially for a group of women 79% of whom are mothers (Ombudsman & Hadjigeorgiou, 2020), will automatically be disqualified from applying for family reunification. The second effect of labelling FDW as ‘temporary’ is that this makes less pressing the need to integrate them in Greek Cypriot society. Thus, the government’s ‘Strategy for the Occupation of the Foreign Working Force in Cyprus’ notes from the outset that FDW are in the country temporarily (Ministry of Labour and Social Insurance, 2007). It creates an obligation on employers to adopt steps for the societal integration of migrant workers, but exempts private employers, including households.

C. Skewed human rights education

The central role that debates about unresolved core issues play in the lives of the people within the frozen conflict society creates a set of societal beliefs about the conflict itself. Key among them is the victimisation of the in-group through examples of human rights violations its members have suffered. This sense of victimhood among Greek Cypriots provides an excuse for why further action is not being taken to protect vulnerable and marginalised groups within the population. While in theory, human rights in the Republic are described as universal principles, the impact of the conflict has given a nationalist flavour to how they are being used. In particular, in an attempt to attract international support, which is expected to translate in additional sway when negotiating a future peace settlement, Greek Cypriots have been presenting themselves – domestically and internationally – exclusively as the victims of human rights violations (Demetriou & Gürel, 2011; Nicolaou & Papadakis, 2020). In turn, this has had two implications. It has encouraged the belief that since Greek Cypriots suffered such gross human rights violations in their past, they are in a special category of their own in terms of the support they deserve from the state. Others might also be victims of (past or present) human rights violations, but their experiences are less horrific than those suffered by the Greek Cypriot community. It is this that explains the dissonance between the refugeehood experience of Greek Cypriots (often presented as doubly victimising because of their status as ‘refugees in their own country’³²) and the experiences of asylum seekers and refugees from abroad.³³ The second implication is that human rights have mostly been viewed as something that is exclusively given or taken by third parties, rather than their protection being the product of local initiatives and public pressure (Yakinthou & Polili, 2010, p. 29; Vural & Peristianis, 2008). As a result, bottom-up attempts to safeguard the rights of vulnerable groups have remained isolated in the fringes of Greek Cypriot society and have not attracted the support of a critical mass of the population.

The skewed understanding of human rights, fuelled by the sense of victimhood among Greek Cypriots, has been institutionalised through, and most visibly taken root in, the RoC educational system. Human rights occupy a prominent position in the syllabus of all year groups, but they are often viewed through the prism of the conflict which presents Greek Cypriots as courageous but weak; powerless to redress injustices against themselves, let alone against others. This is a direct consequence of the war, in the aftermath of which, the school curriculum was developed to teach ‘loyalty to the Hellenic world, the Greek language and Orthodoxy’ (Karyolemou, 2003, p. 364). In this context, all references to human rights concern violations that Greek Cypriots had suffered – but never inflicted – in 1974 (encapsulated in the slogan ‘I Don’t Forget’) (Zembylas et al., 2015). After a 2010 change to the curriculum, human rights started being presented in a more universalist light, alongside ideas, like equality, non-discrimination, democracy and human dignity (Zembylas et al., 2015). Yet, this change has not been accompanied by a parallel modernisation in the teachers’ perceptions of human rights. In a series of studies with primary school teachers, participants adopted universalist conceptions of human rights when talking about them in the abstract but reverted to the familiar ‘I Don’t Forget’ mindset when being asked to give practical examples of human rights violations. All teachers considered the 1974 Turkish invasion as the ‘primary’ starting point and relegated as

less important, violations suffered by Turkish Cypriots, or groups that are somehow ‘other’, such as LGBTQI+ or migrants (Zembylas & et al., 2016). Even teachers who were more critical of the narrative that presents Greek Cypriots as the only victims, were hesitant to say this in class. As one participant put it,

‘We have also committed crimes, it’s not just the Turkish-Cypriots, we have done bad things as well. [...] But all these are “taboos”. If a teacher talks about them, then he is considered ... how shall I say it ... like a traitor?’ (Charalambous et al., 2013)

Unsurprisingly, this emphasis on the war and the victimisation of the students’ parents and grandparents by the foreign other cultivates nationalist or even racist feelings among them. Thus, one student was quoted as saying

I am a racist, I admit it. I just want migrants out of my country. I don’t see anything wrong with that. If we want our country to remain Greek, migrants and Turks should leave. [...] I believe I have the right to be racist, when half of my country is occupied and the other half is about to lose its Greekness. (Zembylas & Lesta, 2011, pp. 488-489)

Another explained

If my duty to love and protect my country from the foreigners and the Turks is considered racism, then let it be so. [...] All foreigners threaten to contaminate our Greek identity, especially the Turk. (Zembylas & Lesta, 2011, pp. 488-489)

These quotes show that racism exists not just against the dominant other (i.e. Turks), but also all migrants, including FDW. The prevalence of such views has been confirmed by an independent study, which shows that students who identify as ‘Greek’, an identity understood as being more exclusive and nationalist than the ‘Cypriot’ one, are more likely to have negative perceptions of Turks and Asian migrants (Stevens et al., 2014). However, if children feel so free to express such racism, it means that their culture, surroundings and educational system allow or even encourage them to do so (Zembylas & Lesta, 2011, p. 492).

In addition to galvanising nationalism, the educational system’s overemphasis on Greek Cypriot victimisation, has turned human rights into communication tools to describe historical injustices against the collective, rather than into mechanisms that empower vulnerable individuals. Thus, its modernization notwithstanding, the curriculum still does not make *any* reference to the rights of FDW, or immigrants and asylum seekers more broadly. Perhaps the starkest illustration of how the educational system views FDW is the recent decision of one school (and allegedly there were more), to include as a gift in its Christmas raffle, the payment of expenses to sponsor a FDW’s entry to the RoC (Associated Press, 2015). This incident took place during the year in which the Ministry of Education set ‘Awareness raising of students against racism and intolerance’ as its priority learning aim (Ombudsman, 2016). Despite criticism, the school insisted that its actions were not wrong, showing no appreciation that the gift did not meet any educational objectives or that it normalised perceptions of FDW as not deserving full respect (Ombudsman, 2016). The failure of the educational system to communicate that FDW have equal human rights, both reflects and contributes to how they are being treated by society as a whole.

6. Conclusion

Frozen conflicts give rise to ‘minor losses’: while they may be non-violent, they are also not cost-free, especially for those within the society that are not members of a dominant group. This article applied the idea of ‘minor losses’ to FDW in the RoC. It acknowledged that FDW are vulnerable everywhere because their gender, migrant status and type of work they perform make them less visible to, or even targets of, those in power. At the same time, it argued that the frozen conflict exacerbates their vulnerability because of the societal dynamics, or consequences, it gives rise to, which, in turn, shape governmental decision making. Thus, in the RoC, the deprioritisation of the feminist agenda has resulted in a lack of acknowledgement that almost all FDW are women, which has, in turn, prevented the development of laws and policies that cater to their specific needs. The normalisation of nationalist speech has portrayed not only Turks, but also migrants as ‘other’, and therefore threatening, to the dominant community, which has justified lower levels of protection by the state. And the skewed understanding of human rights, which has placed emphasis on the Greek Cypriot historical victim, has detracted attention from, and failed to empower, contemporary marginalised groups, such as FDW. Combined, these explain the paradox of why a group like FDW that is seemingly entirely disconnected from the frozen conflict, is nevertheless profoundly affected by it.

In addition to being valuable in the specific case of the RoC, these insights could be useful starting points for further research that assesses the impact of the frozen conflict in other similar contexts, including those in the post-Soviet space, Kosovo, Taiwan and Somaliland. Drawing broader conclusions, the article could be understood as showcasing an example of how frozen conflicts give rise to societal costs that are ‘hidden’ in the sense that they have a detrimental impact on categories of people, or on policies and attitudes that are not connected to the conflict as such. FDW are one example of hidden victims, but others include missing migrants, who are more likely to be trafficked in frozen conflict contexts (Hadjigeorgiou et al, 2021), homosexuals (Kamenou, 2012) or persons with disabilities.

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¹ 83% of domestic workers internationally are women (ILO, 2013, p. 19).

² Personal communication with the Ombudsman (September 2021).

³ Data provided by the RoC Civil Registry and Migration Department. The number does not include FDW residing in the Republic irregularly, who are estimated to be numerically close to those with a valid residence permit (Ombudsman, 2019, p. 26).

⁴ Contract of Employment for Domestic Workers, available at [http://www.moi.gov.cy/moi/crmd/crmd.nsf/All/F16DFEEA3AF1715FC2257D6D0042D6B6/\\$file/DW_CONT_RACT_07.05.2019.pdf](http://www.moi.gov.cy/moi/crmd/crmd.nsf/All/F16DFEEA3AF1715FC2257D6D0042D6B6/$file/DW_CONT_RACT_07.05.2019.pdf), Article 1.A.

⁵ Migrant Integration Policy Index 2020, available at <https://www.mipex.eu/play/>.

⁶ So little attention has the revised employment contract attracted, that the old version of this is still (accidentally, one assumes) on the RoC Civil Registry and Migration Department website. The old employment contract is available at [http://www.moi.gov.cy/moi/crmd/crmd.nsf/All/5314ED0D3F68CA9EC2257D2C003A4DC2/\\$file/DOMESTIC%20WORKER%20ContractOfEmploymentEN.pdf](http://www.moi.gov.cy/moi/crmd/crmd.nsf/All/5314ED0D3F68CA9EC2257D2C003A4DC2/$file/DOMESTIC%20WORKER%20ContractOfEmploymentEN.pdf).

⁷ A 'patron state' is a state that provides financial, political and/or military support, whether unofficially or explicitly, to a de facto state (Kolstø, 2006, p. 733).

⁸ One commonly accepted definition of a 'de facto state' is an entity that fulfils the Montevideo criteria for statehood but lacks international recognition (Toomla, 2016, p. 331). A 'rump state' is the state from which the de facto state claims it should secede and, therefore, whose territory should necessarily be reduced.

⁹ An 'enduring rivalry' is 'a competition between states that involves six or more militarised disputes between the same two states over a period of 20 years' (Hensel et al., 2000, p. 1177).

¹⁰ 'Strategic rivalries' are comprised of two states which must regard each other as competitors and actual or latent threats that pose some possibility of becoming militarised (Thompson, 2001).

¹¹ 'Protracted conflicts' consist of at least sporadic violent outbreaks over long periods of time, which are the result of high stake and highly salient disagreements between the parties (Azar, 1985).

¹² *Cyprus v. Turkey* App no 25781/94 (ECtHR, 10 May 2001).

¹³ These concern how political power and land will be divided between Greek and Turkish Cypriots. For a summary of each side's position, see UN Secretary-General (16 April 2004).

¹⁴ For exceptions, see Rajzman et al. (2003); Georghegan (2008).

¹⁵ E.g., those few Turkish Cypriots who, in 1974, refused to leave their houses in the areas under the effective control of the RoC. (Hadjigeorgiou, 2020, pp. 83-86)

¹⁶ E.g., Greek Cypriot refugees who have negotiated compensation for their lost properties with Turkey without waiting for a remedy to be provided as part of a comprehensive peace agreement (Hadjigeorgiou, 2016, p. 159).

¹⁷ E.g., religious minorities (Constantinou, 2009) or asylum seekers in Cyprus (Yakinthou & Polili, 2010).

¹⁸ A similar point is made by Smetana and Ludvik (2019) who argue that the core issues that remain unresolved in frozen conflicts typically have to do with territorial disputes, minority group rights and questions as to whether ethnic groups should be given greater autonomy.

¹⁹ See, e.g., the lengths to which de facto states go to, to have their sports teams enter international tournaments or their representatives participate in tourist conferences, and the resources that rump states dedicate to stop this (Ker-Lindsay, 2012).

²⁰ According to the most recent publicly available statistics, there were 16,800 FDW in the RoC, 16,500 of whom were women (ILO, 2013, p. 117).

²¹ These beliefs, identified and discussed by Bar-Tal (2007), result in what Galtung (1990) called 'cultural violence'.

²² European Equality Index, available at <https://eige.europa.eu/gender-equality-index/2020/compare-countries>.

²³ Personal communication with president of the Housemaids Association of Cyprus (November 2020).

²⁴ The Minister of Interior has stated that '[i]t is well known that 80% of irregular migrants arrive in [the Republic of] Cyprus from Turkey, through the occupied areas' (Vasiliou, 2020). No source was offered, or could be located, for this statistic.

²⁵ See, e.g., the Minister of Interior stating that 'Of course, bringing migrants of different nationalities to Cyprus takes place in accordance to Turkish plans.' (Vasiliou, 2020).

²⁶ Personal communication with president of the Housemaids Association of Cyprus (November 2020).

²⁷ (Draft) Comprehensive Settlement of the Cyprus Problem (Annan Plan, 31 March 2004), Appendix F.

²⁸ This is supported by statements of the Minister of Interior that ‘The cost of migrants is not just financial. It is, first and foremost, social and demographic’ (Vasiliou, 2020).

²⁹ EU Directive 2003/109/EC, Article 4(1).

³⁰ The majority’s decision has been criticised by academics (Pavlou, 2016) and a strong dissenting opinion. It is also arguably conflicting with a subsequent decision of the Court of Justice of the European Union on the same topic (*Staatssecretaris van Justitie v Mangat Singh* (Case C-502/10, 18 Oct 2012).

³¹ *Cresencia Cabotaje Motilla v. The Republic of Cyprus through the Minister of the Interior and the Chief Immigration Officer* (RoC Supreme Court, Case no. 673/2006, 21 Jan 2008).

³² Despite this being an incorrect use of the term ‘refugee’, it is how it has been used in the RoC. The term is used to describe the experiences of Greek Cypriot internally displaced persons.

³³ See, e.g., the statements of the RoC Minister of Interior (2020) that ‘Cypriots experienced war and refugeehood in 1974 and know first-hand what it means to be *a real refugee*’ (my emphasis).