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FROM PLURALITY TO DIVERSITY: WHAT CHANGING CONCEPTIONS OF THE WORD MINORITY CAN TELL US ABOUT SHIFTING PERCEPTIONS OF DIFFERENCE



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In the polarised political debate of the mid-2020s the word minority has become a buzzword. Be it to reaffirm its commitment to the rights of minorities or to denounce the excesses of 'woke', actors from opposing political sides deploy the language of majorities and minorities in contemporary discussions about diversity. The conception of societies as divided into neatly separated and politically salient majorities and minorities has become so engrained in public debates, at least in Europe and North America, that the idea that this word did not exist in its current meaning only a couple of centuries ago might sound as a radical proposition. Indeed, this is also how academic treatments of the subject have tended to think about minorities.

Until a few years ago, the history of minorities and minority rights followed a standard narrative formulated in the interwar period and expanded since the mid-1990s. According to this account, minority rights originated in the religious wars that ravaged Europe in the 16th and 17th century and the treaties that put an end to them. In the 19th century the concept evolved further, notably transitioning from a focus on religion to one on ethnicity and nationality. This further development occurred around questions related to the dissolution of the Ottoman empire (the so-called Eastern Question), notably through a series of legal documents introducing clauses for the international protection of minority rights such as the Final Act of the Congress of Vienna (1815), the Treaty of Paris (1856) and the Treaty of Berlin (1878). The culmination of this process occurred at the end of the First World War. At the Paris Peace Conference the great powers forced the new states arisen from the dissolution of the continental empires to sign treaties that contained international obligations towards 'racial, religious or linguistic minorities' living on their soil. For the first time in history, an international organisation, the League of Nations, was designated as the guarantor of the respect of such international rights.²

In the last few years, a number of authors have started questioning this traditional account on the basis of the banal observation that the term minority does not appear in any of the 19th century treaties usually deemed to constitute the pillars of the genealogy of minority rights. In other words, this new literature has emphasised how, until now, the history of minorities and minority rights has been written as if the word minority itself had no history.³ Historians and political scientists have treated minority as a category of analysis, formulated in our current times and projected into the past in order to seek 'things' that resemble what we today call 'minorities'. They have ignored that minority can also be analysed as a category of practice, as a term used by contemporary actors in ways that change depending on



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the geographical, social and temporal context. This new historiography has come to the radical conclusion that contemporary dominant meanings of the term minority were mostly absent in discussions about difference before the First World War.

This approach has opened up completely new perspectives. However, in its push for a radical revisionism, it has also too quickly ejected the 19th century from the storyline of minorities. Even more so, it has lost an opportunity to draw an alternative trajectory of minorities and minority rights, one that allows circumventing the idea, popular in the interwar period and replicated in the 1990s, that minorities are a 'problem' of non-Western societies. This new approach allows questioning the assumption that 'western European' states have ever been 'homogenous' or inherently better at managing difference than non-Western ones. Above all, a history of minorities that examine them as a category of practice and goes beyond the traditional account allows to see how understandings of difference and inter-group relations have fundamentally changed with the spread of principles of popular sovereignty and individual equality, as well as how the slow 'discovery' of the people that accompanied this process of diffusion⁴ has fuelled a tendency to think of society as divided into groups whose size and reciprocal relations are deemed to be politically salient.

One major advantage that scholars have today in this quest for the origins of minorities and minority rights as compared to previous explorations of this subject lies in the existence of large corpora of text that can be examined through techniques that allow to evaluate more precisely shifts in the meaning and usage of words. The following story relies extensively on such tools. For reasons of scope, it will focus exclusively on trends in English and German.

The Merriam-Webster dictionary defines a minority group as 'a part of a population thought of as differing from the rest of the population in some characteristics and often subjected to differential treatment'. Other dictionaries offer slightly different but on the whole similar definitions. This formulation is the result of a long process of aggregation of different meanings that occurred at different stages since about the mid-18th century.

Before the turn of the 19th century the most common use of the English word minority was to indicate the condition of being underage. This condition was especially relevant when it concerned monarchs. In societies where political power was based on principles of dynastic legitimacy, the minority of Kings and Queens, especially when their parents died, was a moment of dangerous instability; hence, the dominance of this meaning until the early 19th century. However, from early 18th century onwards, the word minority began to be increasingly used to indicate political groups in parliamentary assemblies. This was especially the case in the British Parliament, where from 1776 onwards the names of MPs who voted in the minority on specific subjects began appearing under the title 'List of the Minority' in the records of the House of Commons and the Senate.

Yet this meaning indicated opinion groups rallying behind specific policies. They were groups that could change very rapidly. As the German legal scholar Georg Jellinek wrote in one of the first scholary work on minority rights, in 1898, these were 'fluctuating' minorities, which had to be distinguished from 'rigid' minorities, i.e. minorities defined around linguistic, religious and phenotypical traits that were harder to change from one day to the next.⁶ This latter meaning of the word minority, which became dominant from the end of the First World War – and in many ways it is still prevalent today – appeared in English texts around the turn of the 19th century, notably in debates relating to the union between Ireland and Great Britain.

The political union of the two islands brought to the fore the problem of Catholic emancipation in the United Kingdom. The English Catholic historian Francis Plowden was one of the first observers to note how, with the Union, Ireland had 'forfeited all the constitutional advantages of a most decided majority in an independent nation to sink into an insignificant minority of the United Kingdom'. Yet, from the outset, the concept of minority revealed its



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relative and situational nature, since discussions of Catholic emancipation also highlighted the presence of a Protestant minority within Ireland itself. By 1816, the term was used flexibly to identify either group (Catholics within the United Kingdom or Protestants within Ireland). Although it had appeared in the public debate, the word minority did not become a dominant concept in discussion about difference in the United Kingdom until the 1880s. A vocabulary of specific groups (Catholics, Protestants, Irish, English) without clear reference to numerical proportions tended to prevail instead. The first Home Rule debate, in 1886, changed that. The prospect of Irish autonomy paved the way to the pervasive deployment of the concepts of majority and minority in their rigid acceptation. This time, the word essentially came to identify the Protestant population of the island. As Irish Home Rule foreshadowed the potential creation of a 'quasi-nation-state' in Ireland along principles of expanded popular sovereignty, the likely political dominance of the Catholic population over the Protestant one brought into sharper focus the categories of minority and majority. By then, the couplet majority-minority in their rigid acceptation had already begun appearing in other contexts within and outside the British Empire.

In the 1830s, the category of minority became salient in the provinces of Upper and Lower Canada. At the end of that decade, Francophone discontent around the dominance of British elites in Lower Canada (today's Quebec) triggered a series of revolts. More specifically, French-speakers, a majority of two-thirds in the colony, called for political representation in line with their demographic size, which in fact was twarthed by an unelected legislative council where English speakers prevailed. The reports of the different officers tasked with understanding the nature of the revolts clearly identified the francophones of Lower Canada as a national minority within the broader British Empire. Once again, the connection between the 'emergence' of minorities and the expansion of popular sovereignty, as well as the nested nature of minorities, were immediately apparent. The Parliamentary discussion that followed the revolts emphasised the need to address francophone demands for better political representation, but it also stressed how 'giving absolute power to the French majority would be the destruction of the English minority'. 10 Like in Ireland, although the couplets majority and minority had entered into use, the vocabulary of specific groups (francophones, English-speakers, Catholics, Protestants) continued to prevail until the second half of the 19th century. In the 1860s, the process of confederation offered a whole new structure of opportunity for the further shift of the semantics of difference in Canada towards the grammar of majorities and minorities. The prospect of confederation highlighted the competitive relation between different groups within the new political union. French-speakers called for religious and linguistic guarantees at the federal level, while both francophones and English speakers demanded rights for their reciprocal minorities within Upper and Lower Canada. All that led to the first inclusion of the word minority (in its 'rigid' meaning) in a constitutional text, in the form of Section 93 of the British North American Act. 11

In the second half of the 19th century the grammar of majorities and minorities, in their rigid acceptation, entered into broader use much farther afield. In the 1880s, it began being deployed in discussions about the relationship between Hindus and Muslims in India, as well as between Muslims and Copts in Egypt, often with direct comparisons to the situation in Ireland. Many authors have stressed how British authorities used the concepts of minority and majority as a tool of divide and rule in both contexts. Yet, it is also true that local actors mobilised the category of minority and minority rights in their own political programmes. Proportional representation became a cornerstone of the All-India Muslim League, which in 1908 called for and obtained the creation of denominational electorates, claiming that any other system would hamper 'the successful election of the real representatives of minorities'. Three years later, representatives of the Egyptian Coptic community formulated one of the first rights programme in history that explicitly referred to permanent minorities. Against the background of rising tensions between this group



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and the Muslim population of the country, marked by the murder of Coptic Prime Minister Boutros Ghali, part of the Coptic leadership convened in the city of Asyut in 1911 and called for minority proportional representation.¹⁴

The Canadian, Egyptian and Indian experiences show that the grammar of majorities and minorities had acquired global currency in English discussions about difference well before the begininning of the First World War. However, contrary to the post-1919 years, minority remained a term among many others within the vocabulary of difference and not necessarily the most commonly used. It brought along a competitive understanding of the relations between groups, one that implied superiority and inferiority, dominance and subordination, as well as the idea that in polities increasingly based on principles of popular sovereignty numbers are strength. The older vocabulary of difference, based on more numerically neutral concepts such as nationality and the concrete names of groups remained equally relevant, although decreasingly so. This was also the case in the German-speaking world.

There is evidence that the word minority in its meaning of a group of people sharing similar opinions in assemblies entered into German use via French. The 1801 Nathan Bailey English-German dictionary translates minority with the French *minorité*, or other terms such as die 'Kleinheit, Minderjahrigkeit, Unmundigkeit, die kleiner Zahl, wenigern Stimmen'. The first occurrences of the term with a political connotation referred to the French revolution and several texts of the early 19th century mention the word Minorität as a foreign import, which they suggested replacing with Minderheit. Until the mid-19th century, minority in German referred only to parliamentary minorities. A major shift occurred with the revolutions of 1848-1849. In this context, the categories of majority and minority with reference to 'rigid' groups emerged around discussions concerning practical democratic rules. ¹⁶

The Kremsier Parliament, which the Austrian revolutionaries set up in July 1848, used extensively the word minority with reference to different national groups living in the Habsburg Empire when discussing voting procedures and popular representation. From that moment onwards, the grammar of majorities and minorities slowy spread within the Empire along three main discursive domains. First, several intellectuals, above all, Georg Jellinek and Otto Bauer, extensively deployed the terms majority and minority in their legal-political works and made fundamental contributions to the theory of minority rights. Second, the Imperial Court (the Reichsgericht) and the Supreme Administrative Court (the Verwaltungsgerichtshof) produced a large jurisprudence on the legal interpretation of article 19 of the 1867 Constitution (on the principle of equality of rights among the nationalities of the Empire) that increasingly defined relations among groups within specific provincial and local contexts in terms of majority-minority relations. Third, and more interestingly because less studied until now, majorities and minorities increasingly populated statistical and demographic studies of the Empire.

Within this third domain, understandings of the relations between nationalities moved from an Imperial conception of plurality and coexistence, in which nationality was not a property that could be objectified and measured quantitatively, to the prevalence of notions of homogeneity/heterogeneity and of competition between groups. This transition mirrored a semantic move from the old vocabulary of diversity to one in which the categories of majority and minority became ever more present, especially in specific provincial contexts. A new generation of statisticians and demographers, among whom Johannes Zemmrich and Henrich Rauchberg, played a pivotal role in this process. At the turn of the 20th century, they progressively abandoned the non-numerical lexicon of specific groups (Germans, Czechs, Hungarians, etc.) and non-numerical terms such as *Sprach-Inseln* (linguistic islands), *nationelle Mischung* (national mixture), etc., to the advantage of a massive use of the terms majority and minority, accompanied by a warlike language of linguistic conquest, losses and frontiers. Zemmrich in particular conceived minorities as a 'problem' and a source of conflict. It is not by accident, that the works of Zemmrich stemmed from a need to account for the potential consequences of proposals to federalise the Empire, in particular concerning Czech demands for the



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unification of the lands of Bohemia, Moravia and Silesia in a single autonomous administrative unit, which Zemmrich saw as extremely dangerous for German minorities. As in the British context, the projection of 'quasi-nation-state' scenarios in a context of expanding popular sovreignty within imperial settings brought into sharper focus the categories of majority and minority.¹⁹

The First World War marked the eventual transition from the vocabulary of nationalities and specific groups to that of minorities and majorities. While until the War the grammar of minorities and majorities had appeared only sparingly in international treaties, that changed dramatically in the period 1919-1923. The minority treaties signed and declarations issued by different countries in central and eastern Europe (and by a few more outside Europe) during those years marked the culmination of this process. Jewish advocacy played a momentous role in bringing about such a shift, as several Jewish organisations promoted the internationalisation of minority rights in Paris.²⁰

However, the transition brought with it a conception of minorities as a 'problem' and one that mostly concerned eastern Europe. ²¹ Western states defined themselves as modern, democratic and homogenous states (or inherently better at assimilating different groups within a single nationhood) that did not need to sign international treaties concerning minority rights. Those treaties were reserved for the 'new Europe', which was deemed to need a lesson in 'international deportment'. ²² More broadly, homogeneity was framed as a goal to be pursued on the way towards modern statehood and heterogeneity as a dangerous shortcoming to be avoided. ²³

Minority questions populated European debates extensively in the interwar period. Yet by the mid-1930s, the system of treaties under the supervision of the League of Nations had become disfunctional. Its asymettric application, its lack of strong enforcement measures and the radicalising context of the 1930s substantially undermined its functioning and legitimacy. Hitler's exploitation of claims to protect German minorities abroad to justify territorial conquest put the final nail in the coffin of minority protection. After the war, international clauses concerning minorities were sidelined in the new rights system of the United Nations to the advantage of a more individualistic and assimilationist understanding of human rights.²⁴ This process brought along a decline in the salience of the categories of majority and minority (in their 'rigid' acceptation) in European public debates. Yet as minority rights were disappearing and the categories of minority and majority were becoming less relevant in Europe, they were simultaneously spreading in the United States.

Throughout the interwar period, United States politicians denied that minority was a relevant category for a country of immigrants in which assimilation seemed the 'natural' process of creation and reproduction of the American polity. In 1948, during the negotiations of the Universal Declaration of Human Rights, Eleanor Roosvelt defended sternly this conception of intergroup relations in the United States when she affirmed that 'minority questions did not exist on the American continent'. ²⁵ Yet in the 1930s, different American scholars, mostly associated with the Chicago Schools of sociology, began importing the European concept of minorities into the study of intergroup and race relations in the United States with the aim to account for the failures of the melting pot model and the persistence of discrimination. ²⁶ By 1965, less than twenty years after Roosevelt's bold statement, Edgar Friedenberg, an American scholar of education studies, could claim that 'the minority group is a special American institution'. ²⁷

In this transition, the notion of minority rights shifted slightly, from one that sought to balance non-discrimination and protection against assimilation in its interwar European understanding, to a much more pronounced emphasis on non-discrimination. Furthermore, the concept of minority expanded considerably to include groups previously not within its remit. Initially introduced in the American academic debate to describe the condition of African Americans, the notion was later extended to other marginalised groups. Between the mid-1960st and the early 1970s, the adoption and practical implementation of Civil Rights legislation led to the establishment of legal minority status for



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six categories of people: African Americas, Asian Americans, Indian Americans, Latinos, women and people with disability. The new expanded American definition of minorities included, for the first time, groups defined around gender and disability, although it left out LGBTQ people despite calls for their inclusion. The definition of women as a minority owed much to the work of sociologist Helen Mayer Hacker, who in 1951 had first proposed to look at women as a minority group. This aspect of the history of minorities shows how, in the American context, the category had lost its strict numerical connotation and had become more firmly anchored to the perception of present and past discrimination, hence more solidly linked to conceptions of equality and inclusion. Minorities were still a 'problem' to be solved, although now through policies of inclusion as compensation for past injustices and marginalisation. The underlying idea however still was that, if compensation worked and discrimination ended, minorities would somehow disappear.

Yet a new twist occurred at the end of the Civil Rights phase. In the 1977 case *Regents of the University of California vs. Bakke*, the American Supreme Court ruled that positive discrimination based on the category of race in university admission could not be justified as compensation for past or present injustice. It rather argued that universities could use race as a criterion in their policies of affirmative action because this could contribute to pursuing the legitimate goal of creating a diverse student body that enriched the academic environment. Implicitly, the Court recognised arguments that saw minorities (and diversity with it) not as a 'problem' to be solved, but as a resource, thus inaugurating contemporary conceptions of diversity as a positive goal towards which society should strive. However, *Regents of the University of California vs. Bakke* was also a very contested ruling that was decided by a majority of 5 vs. 4 and that was followed by contrasting Court decisions.

Such contestation lingers on in contemporary understandings of difference, with diversity and inclusion being defended in some social spheres as a positive goal and outcome, but being contested, if not loathed, in other social circles. Although the last move from a conception of minorities as a 'problem' to that of minorities as a positive element that enriches society by promoting diversity is only partial, the evolution of the shifting understandings of minority surveyed here mirrors a parallel transformation of social perceptions of difference. More specifically, it highlights a transition from a time in which majority and minority (in their 'rigid' meaning) were not salient political categories, to one in which they became driving concepts in discussion about difference. The spread of popular sovereignty (especially in the 19th and early 20th century) and the deepening of principles of individual equality (in the second half of the 20th) have been the main drivers of this story, although contingency, elite interest and manipulation have also played an important role.

However, this story is also incomplete, as it accounts only in part for the evolution of understandings of minorities and minority rights outside Europe and North America, notably in post-colonial countries. There, the assumption often is that the new states that arose from the process of decolonisation prioritised nation-building over minority rights.³⁰ Yet, for now, this is still mostly an assumption and we need more studies on this part of the world to complete the picture drawn above.

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- ¹³ All-India Moslem League, *III Resolution*, Amritsar sitting, 1908, quoted in An Indian Musalman, 'Indian Musalmans and Indian Politics—III', *The Hindustan Review* 29, no. 116 (1909), p. 354.
- ¹⁴ Hussein Ahmed Hussein Omar, "Minorities Are Like Microbes": On Secularism and Sectarianism in English-Occupied Egypt, 1882–1922', *Critical Historical Studies* 9, no. 1 (2022), pp. 63–102.
- ¹⁵ Nathan Bailey, *Dictionary. English-German and German-English*, Vol. 1 (Leipzig: Friedrich Frommann, 1801), p. 488.
- ¹⁶ Struve, Kai. "Nationale Minderheit"-Begriffsgeschichtliches Zu Gleichheit Und Differenz'. *Leipziger Beiträge Zur Jüdischen Geschichte Und Kultur* 2 (2004): 233–258.
- ¹⁷ Jellinek, *Das Recht*; Otto Bauer, *Die Nationalitätenfrage Und Die Sozialdemokratie*. Vienna: Ignaz Brand, 1907.
- ¹⁸ On this jurisprudence see see Gerald Stourzh, *Die Gleichberechtigung der Nationalitäten in der Verfassung und Verwaltung Österreichs*, 1848-1918 (Wien: Verlag der Österreichischen Akademie der Wissenschaften, 1985).
- ¹⁹ See Johannes Zemmrich, 'Die Völkerstämme Österreich-Ungarns (Schluss)', *Geographische Zeitschrift* 5, no. 8 (1899). Johannes Zemmrich, *Sprachgrenze und Deutschtum in Böhmen* (Braunschweig: F. Vieweg und Sohn, 1902); Heinrich Rauchberg, 'Die Entwicklung Der Nationalen Minderheiten in Böhmen, 1880-1900', *Deutsche Erde* 4 (1905): 9–14; Heinrich Rauchberg, *Der nationale Besitzstand in Böhmen* (Leipzig: Duncker & Humblot, 1905).
- ²⁰ On Jewish advocacy of minority rights see Fink, *Defending the Rights of Others*.
- ²¹ Emmanuel Dalle Mulle, Davide Rodogno, and Mona Bieling, 'Introduction: Sovereignty, Nationalism and the Quest for Homogeneity in Interwar Europe', in *Sovereignty, Nationalism and the Quest for Homogeneity in Interwar Europe*, ed. Emmanuel Dalle Mulle, Davide Rodogno, and Mona Bieling (London: Bloomsbury Academics, 2023), 1–20.
- ²² Mark Mazower, 'Minorities and the League of Nations in Interwar Europe', Daedalus 126, no. 2 (1997): 47–63, p. 53.
- ²³ Eric D. Weitz, 'From the Vienna to the Paris System: International Politics and the Entangled Histories of Human Rights, Forced Deportations, and Civilizing Missions', *The American Historical Review* 113, no. 5 (2008): 1313–43.

¹ Treaty between the Principal Allied and Associated Powers and Poland [henceforth Treaty with Poland], 28 June 1919, http://ungarischesinstitut.de/dokumente/pdf/19190628-3.pdf (accessed on 17.11.2023).

² For the traditional account see, Fink, Carole. *Defending the Rights of Others*. Cambridge: Cambridge University Press, 2006; Jackson Preece, Jennifer. *National Minorities and the European Nation-States System*. Oxford: Clarendon Press, 1998; Liebich, Andre. 'Minority as Inferiority: Minority Rights in Historical Perspective'. *Review of International Studies* 34, no. 2 (April 2008): 243–63..

³ For this new literature see Bence Bari, László and Anna Adorjáni. 'National Minority: The Emergence of the Concept in the Habsburg and International Legal Thought'. *Acta Universitatis Sapientiae, European and Regional Studies* 16, no. 1 (20 February 2020): 7–37; Van Rahden, Till. *Vielheit: jüdische Geschichte und die Ambivalenzen des Universalismus*. Hamburg: Hamburger Edition, 2022; Robson, Laura. 'Capitulations Redux: The Imperial Genealogy of the Post–World War I "Minority" Regimes'. *The American Historical Review* 126, no. 3 (2021): 978–1000.

⁴ Le peuple introuvable histoire de la représentation démocratique en France, Bibliothèque des histoires (Paris: Gallimard, 1998).

⁵ See https://www.merriam-webster.com/dictionary/minority (accessed on 25 July 2024).

⁶ Georg Jellinek, *Das Recht der Minoritäten, Vortrag gehalten in der juristischen Gesellschaft zu Wien, von Dr. Georg Jellinek* (Wien: A. Hölder, 1898), pp. 28-29.

⁷ Francis Plowden, *Historical Review of the State of Ireland*. Vol. 2 (London: Rowarth, 1803), p. 980.

⁸ See for instance *Home Rule: A Reprint from The Times of Recent Articles and Letters* (London: George Edward Wright, 1886).

⁹ See for instance Commissioners for the investigation of all grievances affecting His Majesty's subjects in Lower Canada, General Report, 15 November 1836, in *Reports of the Commissioners Appointed to Inquire into the Grievances Complained of in Lower Canada* (London: The House of Commons, 1837), p. 8.

¹⁰ Speech of the right honourable Lord Ashburton (in the House of Lords) on the second reading of the Canada Government Bill, (London, 1838), p. 7.

¹¹ See for instance Provincial Parliament of Canada, *Parliamentary Debates on the subject of the Confederation of the British North American Provinces* (Quebec: Parliamentary Printers, 1865).

¹² Christopher Bayly, 'Representing Copts and Muhammadans: Empire, Nation, and Community in Egypt and India, 1880-1914', in *Modernity and Culture: From the Mediterranean to the Indian Ocean*, ed. Leila Tarazi Fawaz, Christopher A. Bayly, and Robert Ilbert (New York: Columbia University Press, 2002), 158–203.



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²⁴ Emmanuel Dalle Mulle and Mona Bieling, 'The Ambivalent Legacy of Minority Protection for Human Rights', *Schweizerische Zeitschrift Für Geschichte - Revue Suisse d'histoire* 71, no. 2 (2021): 267–90.

²⁵ Eleanor Roosvelt, Commission on Human Rights, 15 June 1948, UN doc. E/CN.4/SR.73.

²⁶ See among others Louis Wirth, 'The Problem of Minority Groups', in *The Science of Man in the World Crisis*, ed. Ralph Linton (United States: Ulan Press, 2012); Donald Young, *American Minority Peoples; a Study in Racial and Cultural Conflicts in the United States*, Harper's Social Science Series (New York: Harper & Brothers, 1932); Edward F. Frazier, *The Negro Family in the United States*, 1947; Francis J. Brown and Joseph S. Rouček, *Our Racial and National Minorities: Their History, Contributions, and Present Problems*, Prentice-Hall Education Series (New York: Prentice-Hall, 1939).

²⁷ Quoted in Philip Gleason, 'Minorities (Almost) All: The Minority Concept in American Social Thought', *American Quarterly* 43, no. 3 (1991): 392–424, p. 402.

²⁸ John David Skrentny, *The Minority Rights Revolution* (Cambridge: Belknap Press of Harvard University Press, 2002).

²⁹ Helen Mayer Hacker, 'Women as a Minority Group', Social Forces 30, no. 1 (1951): 60–69.

³⁰ See for instance Mohammad Shahabuddin, *Minorities and the Making of Postcolonial States in International Law* (Cambridge: Cambridge University Press, 2021).

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