



Legal Rights And Protections For Lgbtqia+ Individuals

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Abstract: Focusing on the seminal National Legal Services Authority v. Union of India (2014) decision and following developments, this essay critically evaluates the judicial attitude towards transgender rights in India. By establishing transgender people as a distinct "third gender," the NALSA ruling upheld the fundamental rights of transgender people to self-determination, recognition, and equality. Cases like Ms. S. Sushma v. Commissioner of Police and Arun Kumar v. Inspector General of Registration show how the court has moved forward in protecting LGBTQIA+ rights and outlawing conversion therapy and other forms of discrimination. Additionally, the research examines the 2019 Transgender Persons (Protection of Rights) Act, assessing its effects and shortcomings in guaranteeing real equality. Transgender people still face structural impediments and social stigma that prevent them from fully realizing their rights, even if the law has made progress in this area. At the conclusion of the article, it is emphasized that the court plays a crucial role in modern India in advancing gender justice, constitutional morality, and inclusivity.

Keywords: Transgender Rights, NALSA Judgment, Judicial Approach, Gender Identity, Equality, LGBTQIA+, Judicial interventions, Societal attitudes

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INTRODUCTION

A story of perseverance, defiance, and perseverance is woven into the fabric of transgender rights in India's social fabric. The complex web of cultural, social, and legal factors influencing discussions about transgender rights in modern India is the subject of this introductory piece. The essay examines the complicated nature of the fight for transgender rights in India by looking at historical backdrops, legislative frameworks, judicial interventions, social attitudes, and ongoing obstacles.

Transgender people in India have a complex history that is woven with acceptance, discrimination, and cultural subtleties. For a long time, transgender people in India have played special roles in religious rituals, cultural celebrations, and social histories, and they are revered as "hijras" in traditional Indian culture. But behind the formal recognition is a history of oppression, marginalization, and opacity, mirroring the fights of transgender people to be themselves in the face of prejudice and social standards.

The long road towards transgender rights recognition in Indian law is marked by landmark decisions, legislative changes, and continuing obstacles. Central to this shift in the law is the 2014 Supreme Court ruling in National Legal Services Authority v. Union of India, which upheld transgender people's rights as a "third gender." A new age of legal recognition and protection for gender-diverse persons has begun with

this court decision, which sought to address the historical injustices and systematic disparities experienced by transgender populations. The intersectional character of sexuality and gender rights in India's legal system has been highlighted by court fights that have challenged discriminatory statutes, such as Section 377 of the Indian Penal Code, 1860.

In India, transgender people have reason to be hopeful because of judicial interventions that have arisen inside the halls of justice. Navtej Singh Johar v. Union of India is one of many landmark decisions that have upheld the right of people to freely select their partners and decriminalized consensual same-sex relations. A similar turning point in the fight for transgender rights has been the recent decision by the Madras High Court to outlaw conversion therapy and guarantee protection for transgender people. This decision demonstrates the judiciary's dedication to preserving constitutional principles of equality and justice.

People who identify as transgender in India face a multitude of challenges outside of the courtroom, including prejudice, sexism, and economic inequality. Transgender people continue to be marginalized and their lived experiences are overshadowed by the pervasiveness of stigma, bigotry, and violence. Furthermore, entrenched cultural biases and societal norms often render transgender identities invisible, relegating them to the margins of public discourse and policy-making processes.

The fight for transgender rights in India requires solidarity, understanding, and perseverance at this pivotal juncture in the country's history. Dismantling the impediments blocking the full fulfillment of transgender rights in India requires a comprehensive strategy that includes legislative changes, policy initiatives, and social transformation. Transgender people may be welcomed as full members of society, their rights honored, and their dignity preserved if we encourage open discussion, raise our voices, and fight for inclusive legislation.

Transgender individuals in India have long faced marginalization, discrimination, and lack of legal recognition. But changes in the law and in public opinion have shown that transgender people's rights are becoming more acknowledged as fundamental to human decency and equality. Highlighting important court interventions, legislative improvements, and new obstacles, this essay examines the social and legal aspects of transgender rights in India.

RESEARCH OBJECTIVES

- To critically examine the legal and judicial frameworks governing transgender rights in India, including landmark judgments and legislative reforms.
- To explore the socio-cultural dynamics shaping attitudes, perceptions, and experiences of transgender individuals within Indian society, with a focus on stigma, discrimination, and marginalization.

RESEARCH QUESTIONS

1. How have legal and judicial interventions, including landmark judgments and legislative reforms, influenced the recognition and protection of transgender rights in India?
2. What are the prevailing socio-cultural attitudes, perceptions, and experiences of transgender individuals in Indian society, and how do they contribute to stigma, discrimination, and marginalization?

RESEARCH METHODOLOGY

The research technique used in this work is mostly doctrinal, with an emphasis on studying legal texts that are pertinent to transgender rights in India. These documents include constitutional provisions, legislative enactments, and judicial declarations. Academic publications, judicial decisions, government reports, and legislative documents are all part of the extensive legal literature assessment that is necessary for data collecting. The purpose of this research is to determine which constitutional protections, anti-discrimination statutes, and pertinent case law have had the most impact on the establishment and preservation of transgender rights. Academic honesty, clear reference, and fair portrayal of legal viewpoints are all ethical factors to think about.

HISTORICAL CONTEXT

There have been major turning points in the debate around transgender rights as India's legislative recognition of transgender rights has evolved over time. When the Supreme Court upheld transgender people's rights to self-identify as gender and to obtain basic rights and benefits in the 2014 NALSA decision, it was a watershed moment. This landmark decision represented a paradigm shift in India's approach to transgender rights, challenging prevailing societal norms and legal frameworks that had long marginalized and discriminated against transgender individuals.

The NALSA judgment not only recognized transgender persons as a '*third gender*' but also affirmed their inherent dignity and humanity, irrespective of their gender identity. Transgender people have the same constitutionally guaranteed rights and protections as cisgender people since the Supreme Court recognized their right to self-determination and autonomy over their gender. Transgender people confront systematic prejudice and social exclusion, and its acknowledgment was more than just symbolic; it had far-reaching consequences for legislative and policy changes to combat these issues.

After the NALSA ruling, many began to see the importance of passing new laws that would fully include transgender people and protect their rights. As a result, transgender people in India now have legal protections thanks to the Transgender Persons (Protection of Rights) Act, 2019. The Act sought to prohibit discrimination based on gender identity and ensure transgender persons' access to various entitlements, including education, healthcare, employment, and social security.

But there are still obstacles to turning legal recognition into real transformation, even if the Transgender Persons Act of 2019 was passed. The efficacy of the Act in protecting transgender rights has been hindered due to implementation challenges such as unclear wording, excessive bureaucracy, and insufficient enforcement measures. Moreover, deep-seated social stigma, discrimination, and lack of awareness continue to perpetuate the marginalization and exclusion of transgender individuals from mainstream society.

Everyone involved must work together if transgender people in India are to see their rights advanced in the face of these obstacles. The government is taking aggressive steps to fill legislative and practice gaps and make sure the Transgender Persons Act is being effectively implemented. Further, transgender people must be the focus of public education initiatives that aim to dispel myths and prejudices and encourage

acceptance and inclusion. Promoting transgender rights and programs that uphold the dignity and equality of all persons, regardless of their gender identification, requires the active participation of civil society groups, activists, and international partners.

There is still a long way to go before transgender people in India can fully participate in society, despite the fact that their rights have been recognized. Moving forward with transgender inclusion will need changes in legislation as well as a change in cultural norms and practices that welcome and support people of all gender identities.

LEGAL FRAMEWORK

Recent years have seen major changes to India's legal framework pertaining to transgender rights, with historic court rulings and legislative measures attempting to tackle the transgender community's systematic discrimination and social exclusion. The 2014 Supreme Court ruling in the National Legal Services Authority (NALSA) case, which acknowledged transgender people as a "third gender," represents ground zero for these changes. This landmark decision upheld transgender people's right to self-determination about their gender identification and guaranteed them the same basic protections enjoyed by cisgender people. The acceptance of transgender people as a separate gender category marked a turning point in India's policy for transgender rights, which had previously been obstructed by long-standing prejudices and social standards.

The Transgender Persons (Protection of Rights) Act 2019 was passed by the Indian Parliament to provide transgender people legal recognition and protection, expanding upon the concepts established in the NALSA ruling. The purpose of the Act was to protect transgender people's rights by making it illegal to treat them differently and by guaranteeing them access to resources including healthcare, education, jobs, and social security. But there have been many problems with the Act's execution, which makes one wonder how well it will tackle the transgender communities' systematic impediments and injustices, despite its good intentions.

One of the critical challenges in implementing the Transgender Persons Act relates to the ambiguity and lack of clarity in its provisions, which has led to confusion and uncertainty among stakeholders. Some have argued that the Act violates the right to self-identification and creates needless bureaucratic barriers; for example, transgender people are required to get certification from a District Magistrate in order to be recognized as transgender. Others have argued that the Act excludes those whose gender identification does not fit into conventional male or female categories and reinforces binary gender norms since it does not specifically acknowledge non-binary and gender non-conforming identities.

Another area of concern pertains to the Act's provisions regarding access to healthcare, education, and employment opportunities for transgender persons. Quality healthcare, inclusive education, and meaningful work remain out of reach for transgender people, despite the legal need to provide non-discrimination and equal access to these vital services. Discrimination, stigma, and lack of awareness among healthcare providers, educators, and employers often result in transgender individuals being denied their rights and subjected to harassment, violence, and exclusion.

Transgender people are already at a higher risk of experiencing social and economic marginalization, which

only makes their situation worse. Affirmative action and specific interventions are urgently needed to address the institutional hurdles and structural disparities that transgender people face, as well as the high rates of homelessness, unemployment, and poverty that they experience.

Judgmental activism, civil society lobbying, international human rights standards, and legal changes have all played a role in shaping India's attempts to improve transgender rights. Legal precedents and policy changes have been greatly aided by the judiciary's interpretation and enforcement of the constitutional provisions of non-discrimination, equality, and dignity as they pertain to transgender rights. In order to meet the needs and problems of transgender populations, activists, advocacy groups, and civil society organizations have rallied public support, increased awareness, and pushed for legislative reforms.

The International Covenant on Civil and Political Rights and the Universal Declaration of Human Rights have given a framework for advancing transgender rights in India and for holding the government responsible for its responsibilities. The ratification of these accords and India's participation in international forums demonstrate the country's commitment to ensuring that all people, regardless of their gender identity or expression, are treated with dignity and respect.

Although there has been a lot of success in getting transgender people's rights recognized and protected in India, there are still a lot of obstacles to putting that recognition into practice. It will need coordinated action to fill in the blanks, fortify the enforcement mechanisms, and guarantee transgender rights are adequately protected in all areas in order to put the Transgender Persons Act 2019 into effect. The government, courts, civil society, and foreign partners must work together and take action to stop transgender discrimination, empower transgender people, and break down institutional hurdles in India. Only through collective action and sustained advocacy can India realize its vision of a society where transgender individuals can live with dignity, equality, and full participation in all aspects of life.

SOCIETAL ATTITUDES AND CHALLENGES

Pervasive stigma, discrimination, and violence against transgender persons exist in India, despite considerable legal changes and legislative efforts to recognize transgender rights. This highlights the ongoing issues in society attitudes and views. There is still widespread stigma, prejudice, and violence against transgender people in India, even though their rights have been recognized and laws have been changed. Marginalization and isolation from mainstream society are perpetuated by societal views regarding transgender individuals, which are strongly ingrained. Legal changes and collective actions to question social norms, increase understanding, and foster inclusion and acceptance are necessary to tackle these difficulties.

In India, transgender people face bigotry, violence, and hostile attitudes in many places, including schools, workplaces, hospitals, and public areas. Many forms of transgender discrimination stem from long-held assumptions about how people should behave based on their gender. Because of the difficulty in incorporating non-binary gender expressions and identities into traditional binary gender theory, transgender people are often excluded from society and marginalized.

When it comes to transgender people, getting an education and finding a job are two of the biggest obstacles. It is common for transgender people to face prejudice and discrimination at school and on the

job, which makes it difficult for them to achieve their goals. Because of prejudice and stigma, many transgender people have a harder time getting a good education and finding stable jobs.

Additionally, transgender people face substantial obstacles when trying to get mental health assistance and gender-affirming healthcare. Poor and insufficient treatment for transgender people is often the result of healthcare practitioners' lack of understanding and compassion as well as discriminatory actions. Many transgender individuals report facing discrimination and mistreatment when seeking healthcare services, further exacerbating their vulnerability and marginalization.

Transgender people confront not just institutionalized prejudice but also increased dangers of physical assault and verbal abuse in both public and private settings. As a result of transphobic beliefs and biases, transgender people are often the targets of verbal harassment, physical assault, and hate crimes. The fear of violence and harassment significantly impacts transgender individuals' freedom of movement and ability to participate fully in public life, perpetuating their social exclusion and marginalization.

The critical need of taking immediate and all-encompassing action to combat transgender discrimination and stigmatization cannot be overstated. Together with attempts to improve society's views and attitudes towards transgender people, it is vital to have legal recognition and amend legislation.

In order to combat prejudice, misconceptions, and bigotry, it is essential to implement public awareness campaigns, educational programs, and sensitivity training programs specifically for transgender people. These efforts aim to create a more accepting and inclusive society by including communities, schools, businesses, and healthcare institutions in the fight for transgender rights and dignity.

In addition to fighting violence and prejudice against transgender people, we must also work to increase their visibility and inclusion in public policy and decision-making. If we want to challenge current power structures and promote social change, we must provide transgender people the tools they need to fight for their rights and have their voices heard.

A combination of legislative changes, public awareness campaigns, and community involvement activities is necessary to address social attitudes and difficulties towards transgender people in India. By challenging stereotypes, promoting inclusivity, and fostering acceptance, society can create a more equitable and supportive environment for transgender individuals to thrive and fully participate in all aspects of life.

RECENT JUDICIAL PRONOUNCEMENTS

Recent judicial pronouncements in India have marked significant milestones in protecting and advancing transgender rights, reflecting a commitment to upholding constitutional values and principles of justice. One such landmark case is *Ms. S. Sushma v. Commissioner of Police* (2021), which stands out for its decisive stance against conversion therapy and its emphasis on ensuring the safety and protection of transgender persons.

This historic ruling by the Supreme Court clearly outlawed conversion therapy, a cruel and forceful method of changing a person's gender or sexual orientation. Transgender people have the right to self-determination and physical integrity, which the Court recognized when it banned this practice, affirming their dignity and

autonomy. This decision not only provides legal protection for transgender persons but also sends a powerful message that their rights and identities must be respected and upheld under the law.

The verdict also highlighted the responsibility of the court to ensure the security of transgender people. The Court highlighted the state's responsibility to provide a climate that honors and safeguards the rights of transgender people, recognizing their increased susceptibility to assault, discrimination, and harassment. By condemning any form of discrimination or violence against transgender individuals, the judiciary asserted its commitment to ensuring justice and equality for all members of society.

The judiciary's attitude to transgender rights is guided by a progressive interpretation of constitutional values, namely Articles 14 (Equality before the law), 15 (Prohibition of discrimination), and 21 (Right to life and personal liberty). Through these interpretations, the judiciary has expanded the scope of rights and freedoms available to transgender individuals, challenging discriminatory practices and promoting inclusivity.

Affirmative action and social inclusion, according to recent court statements, are crucial to ending transgender people's systematic marginalization and discrimination. Transgender people should be able to access all necessary services, including healthcare, schools, and jobs, without discrimination, according to the courts. Additionally, they have emphasized the need for awareness-raising and sensitivity training on transgender issues across all sectors of society.

The advancement of transgender rights in India has been greatly aided by recent legal judgments. The court has helped challenge conventions, fight prejudice, and promote social inclusion by maintaining principles of dignity, equality, and non-discrimination. In order to create a more fair and equal society for everyone, the court must maintain its proactive position in safeguarding the rights and dignity of transgender people.

CONCLUSION

Finally, in India, the fight for transgender rights has been a watershed moment in the fight for human dignity, social justice, and equality. There is no question that the improvements made to the law and government policy over the years have set the stage for future success. Nevertheless, there are still major obstacles to overcome in order to combat systematic discrimination, increase social acceptability, and guarantee the efficient execution of current legislation.

Even though transgender people are legally protected, they nonetheless face widespread discrimination, assault, and stigma that prevents them from fully participating in society. Many transgender people are further marginalized because of ingrained cultural norms and societal views that keep them on the outside looking in and deny them basic human rights and opportunities. It will need a coordinated effort to encourage the court, civil society groups, and government institutions to work together in order to overcome these obstacles. When these groups collaborate, they can develop and execute thorough plans to raise awareness, combat discrimination, and provide a welcoming space for transgender people.

To further guarantee the progress and preservation of transgender rights, it is essential to effectively execute current laws and regulations. This calls for laws that are both legally binding and effectively enforced, as well as programs to strengthen community capacity and public awareness campaigns to bring

attention to the transgender population's rights and needs. India must keep transgender people's rights and welfare at the forefront of its efforts to build a more inclusive and equal society. India may achieve its goal of creating a society where all individuals, regardless of their gender identification, are appreciated, respected, and able to live a life of dignity and fulfillment if it recognizes and respects the inherent dignity of its citizens, recognizes and respects their autonomy, and provides equal rights and opportunities to everyone.

IMPLICATIONS AND FUTURE DIRECTIONS

Recognizing the various ramifications of current legal, social, and policy changes is crucial as India navigates the complicated terrain of transgender rights. These ramifications influence the here and now and provide light on where transgender rights advocacy and action may go from here.

In its 2014 NALSA ruling, the Supreme Court of India legally recognised transgender people as a "third gender," marking a turning point in its legal history. Transgender people's freedom to self-identify as they see fit was upheld in this historic ruling, which also paved the way for further policy and legal changes to combat systematic discrimination and social exclusion. However, the full realization of transgender rights hinges on the practical implementation of existing laws and policies, as well as the enactment of additional measures to safeguard their rights and well-being.

Recent judicial decisions have important ramifications, one of which is the need for customized interventions to overcome the specific barriers that transgender people have while trying to get healthcare, schools, jobs, and social assistance. Despite safeguards in place, transgender people still face prejudice, stigma, and a general lack of understanding from healthcare professionals, all of which make it difficult for them to get adequate medical treatment. Equally restricting to transgender people's chances for social and economic growth is prejudice and exclusion in the workplace and educational institutions, which keeps them mired in poverty and marginalization.

India has to make it a top priority to create and execute laws and programs that help transgender people get the healthcare, education, jobs, and social services they need in order to overcome these obstacles. Some of these projects aim to remove obstacles to employment and economic empowerment for transgender people, provide safe and welcoming educational settings for transgender pupils, and educate healthcare providers on how to provide transgender-inclusive treatment.

In addition, it is imperative that the community at large, together with government entities and civil society groups, work together to remove transgender discrimination, violence, and stigma. To promote social change and dismantle long-standing biases and preconceptions, it is crucial to implement sensitization programs that challenge society views and encourage acceptance and inclusion of transgender individuals.

Moving forward, the success of transgender rights campaigns in India will depend on everyone's joint work to improve transgender people's lives. This involves maintaining partnerships with civil society groups to provide transgender people advocacy and support services, and with lawmakers to pass laws that recognize and affirm transgender people's rights.

The fulfillment of transgender rights in India requires a thorough and diverse strategy that tackles the many

obstacles encountered by transgender people. A more inclusive and equitable society, where transgender rights are fully realized and respected, may be achieved in India if all stakeholders work together and transgender people's rights are prioritized.

References

1. 7 years after SC judgment, third genders say they feel like second class citizens. (2021, June 16). India Today. <https://www.indiatoday.in/india/story/supreme-court-nalsa-judgment-third-genders-transgenders-pride-month-1815578-2021-06-16>
2. Bhattacharya, S., Ghosh, D., & Purkayastha, B. (2022). 'Transgender Persons (Protection of Rights) Act' of India: An Analysis of Substantive Access to Rights of a Transgender Community. *Journal of Human Rights Practice*, 14(2), 676–697. <https://doi.org/10.1093/jhuman/huac004>
3. Chacko, J. (2022, February 12). Towards a gender-inclusive future: Judicial developments recognising rights of the transgender community in India. *Bar and Bench - Indian Legal News*. <https://www.barandbench.com/columns/towards-a-gender-inclusive-future-judicial-developments-recognising-the-rights-of-the-transgender-community-in-india-and-the-road-ahead>
4. Challenges to Transgender Persons Act. (n.d.). Supreme Court Observer. Retrieved April 30, 2024, from <https://www.scoobserver.in/cases/swati-bidhan-baruah-union-of-india-challenges-to-transgender-persons-act-case-background/>
5. Das, A. (2023, July 26). Transgender Persons Can Avail SC/ST/OBC/EWS Reservation; No Separate Quota: Centre Tells Supreme Court. <https://www.livelaw.in/top-stories/supreme-court-blanket-reservation-policy-transgender-persons-centre-contempt-petition-233687>
6. Das, M. (2018, February 3). Should rape laws in India be gender neutral? Experts weigh in. *The News Minute*. <https://www.thenewsminute.com/news/should-rape-laws-india-be-gender-neutral-experts-weigh-75834>
7. Divan, V., Cortez, C., Smelyanskaya, M., & Keatley, J. (2016). Transgender social inclusion and equality: A pivotal path to development. *Journal of the International AIDS Society*, 19(3Suppl 2), 20803. <https://doi.org/10.7448/IAS.19.3.20803>
8. Doc202263068801.pdf. (n.d.). Retrieved April 29, 2024, from <https://static.pib.gov.in/WriteReadData/specificdocs/documents/2022/jun/doc202263068801.pdf>
9. Dutta, A. (n.d.). contradictory tendencies: the supreme court's nalsa judgment on transgender recognition and rights. 5.
10. India: Government must implement NALSA judgment and protect transgender people. (2016, April 15). International Commission of Jurists. <https://www.icj.org/india-government-must-implement-nalsa-judgment-and-protect-transgender-people/>
11. India: Transgender Bill Raises Rights Concerns | Human Rights Watch. (2019, July 23).

<https://www.hrw.org/news/2019/07/23/india-transgender-bill-raises-rights-concerns>

12. Issue of Self-identification and Absence of Proper Mechanism: NALSA vs. UOI. (2021, June 28). The Law Blog. <https://thelawblog.in/2021/06/28/issue-of-self-identification-and-absence-of-proper-mechanism-nalsa-vs-uoi/>
13. Journal, C. L. R. (2020, September 17). Civil And Political Rights Of LGBT: The Perspective Of Indian Constitution. The Law Brigade Publishers (India). <https://thelawbrigade.com/constitutional-law/civil-and-political-rights-of-lgbt-the-perspective-of-indian-constitution/>
14. Kothari, J. (2018, September 14). The Supreme Court trans-formed. The Hindu. <https://www.thehindu.com/opinion/op-ed/the-supreme-court-trans-formed/article24949441.ece>
15. Kothari, J. (2020). trans equality in india: affirmation of the right to self- determination of gender.
16. Loh, J. U. (2018). Transgender identity, sexual versus gender ‘rights and the tools of the Indian state. *Feminist Review*, 119, 39–55.
17. Maniyar, Zahid. (2023a, March 31). Reflecting on Transgender Rights in 2023: Have Legal Recognition and Advocacy Efforts Broken the Cycle of Discrimination and Ostracism? CJP. <https://cjp.org.in/reflecting-on-transgender-rights-in-2023-have-legal-recognition-and-advocacy-efforts-broken-the-cycle-of-discrimination-and-ostracism/>
18. Maniyar, Zahid. (2023b, August 30). From Judgments to Handbook: India’s Transformative Journey towards LGBTQIA+ Equality. CJP. <https://cjp.org.in/from-judgments-to-handbook-indias-transformative-journey-towards-lgbtqia-equality/>
19. Marginalities Aren’t Hermetically Sealed. The Decade-Old “NALSA” Judgment Ignores This. (n.d.). Retrieved April 30, 2024, from <https://thewire.in/caste/caste-gender-queer-nalsa-judgment-transgender>
20. Mishra, A. (2016). Third Gender Rights: The Battle for Equality. *Christ University Law Journal*, 5(2), 9–21. <https://doi.org/10.12728/culj.9.2>
21. NALSA Judgment: Critique of the Indian Perspective Beyond the Adams-And-Eves Worldview. (n.d.). Global Freedom of Expression. Retrieved April 30, 2024, from <https://globalfreedomofexpression.columbia.edu/publications/nalsa-judgment-critique-of-the-indian-perspective-beyond-the-adams-and-eves-worldview/>
22. Network, L. N. (2023, March 28). Horizontal Reservation for Transgender Persons: Supreme Court Refuses to Entertain Plea to Clarify NALSA Judgment. <https://www.livelaw.in/top-stories/horizontal-reservation-for-transgender-persons-supreme-court-refuses-to-clarify-nalsa-judgment-224932>
23. Over Two Years After Landmark Judgment, Transgender People Are Still Struggling. (n.d.). Retrieved April 30, 2024, from <https://thewire.in/gender/over-two-years-after-landmark-judgment-transgender-people-are-still-struggling>
24. Protecting and Advancing Health Care for Transgender Adult Communities. (2021, August 18). Centre

for American Progress.

<https://www.americanprogress.org/article/protecting-advancing-health-care-transgender-adult-communities/>

25. Review, L. S. P. (2023, May 23). Realising the promise of legal inclusion of transgender persons in NALSA. Law School Policy Review & Kautilya Society.
<https://lawschoolpolicyreview.com/2023/05/24/realising-the-promise-of-legal-inclusion-of-transgender-persons-in-nalsa/>
26. SINGH, K. (2023, July 11). Transgender Rights Movement in India: Fighting for Equality and Acceptance. the story mug. <https://thestorymug.com/transgender-rights-movement-in-india-fighting-for-equality-and-acceptance/>
27. The struggle of trans and gender-diverse persons. (n.d.). Ohchr. Retrieved April 29, 2024, from <https://www.ohchr.org/en/special-procedures/ie-sexual-orientation-and-gender-identity/struggle-trans-and-gender-diverse-persons>
28. Williamson, M. (2023). A Global Analysis of Transgender Rights: Introducing the Trans Rights Indicator Project (TRIP). Perspectives on Politics, 1–20. <https://doi.org/10.1017/S1537592723002827>