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### The Transgender Persons (Protection of Rights) Act, 2019: A Legal Perspective

By- Medha Rudra

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#### ABSTRACT

*Transgender is a word used to describe such a person whose gender identity is different from the child's sex as recognized at birth. The gender identity of an individual is the personal or innermost sense of feeling of being a male or female. Transgender people face widespread discrimination while searching for jobs, entry to public places, working with others, etc. They were not given an equal level of rights and protection which other citizens of the country enjoy. But slowly perspective of the people and society is changing. With a view to protecting the rights of transgender people and for the welfare of such people, the Ministry of Law and Justice introduced 'The Transgender Persons (Protection of Rights) Act, 2019'. This is aimed at addressing the matters relating to transgender people like their right to residence, the prohibition against discrimination, providing healthcare facilities, etc. This paper will discuss the provisions stated in the Transgender Persons (Protection of Rights) Act, 2019, for the welfare of transgender people. The author will also describe the history and background, which led to the introduction of this Act. This paper will analyse and discuss the problematic and discriminating aspects which were raised against the Transgender Persons (Protection of Rights) Bill, 2019, and the reasons because which the LGBT community opposed it. The author will also present a comparative analysis of the Transgender person's rights in India with other*

*developed and developing countries. The fundamental right under Article 21 of the Right to Live with Dignity is applicable to all citizens of the country. This step, which moves forward towards the recognition of the rights of transgender people and protecting such individuals from discrimination, will create a better environment for them to live in.*

**Keywords:** *Transgender, Gender Identity, Protection of Rights, LGBT Community, Discrimination*

## INTRODUCTION

The Transgender Persons (Protection of Rights) Act, 2019 is an Act of Parliament that aims to protect the rights of transgender persons, and the Act also deals with matters related to their welfare and other affairs. Their welfare and for matters related to them. Thawar Chand Gehlot, Minister of Social Justice and Empowered, presented the Act on 19<sup>th</sup> July 2019 before the Lok Sabha, which is after the lapse of the Transgender Persons (Protection of Rights) Bill, 2018. The 2018 Bill faced protests and criticisms by transgender persons, activists, and lawyers. The Act of 2019 addressed to few critically opposed provisions but failed to address other principle provisions. The Lok Sabha passed it on 5<sup>th</sup> August 2019, and on 26<sup>th</sup> November 2019, the Rajya Sabha gave the assent on it. On 5<sup>th</sup> December 2019, the President gave his assent on it, and the Act came into effect 10<sup>th</sup> January 2020, and the same was notified by the Gazette through a notification on the same day. Transgender persons as defined in Section 2(k) in the Transgender Persons (Protection of Rights) Act, 2019 refers to “a person whose gender does not match with the gender assigned to that person at birth and includes trans-man or trans-woman (whether or not such person has undergone Sex Reassignment Surgery or hormone therapy or laser therapy or such other

therapy), person with intersex variations, genderqueer and person having such socio-cultural identities as Kinner, Hijra, Aravani and Jogta.” Intersex variations are defined as the variations in the primary sexual characteristics of a person at birth, external genitalia, chromosomes, or hormones that are different from the standard bodily structure of a male or female body. Transgender people very often face discrimination in society in various forms, and this Act thus guarantees to protect against such discriminations and help them in availing equal rights as other people in society.

### **PROVISIONS FOR PROTECTION AGAINST DISCRIMINATION**

Section 3 of the Transgender Persons (Protection of Rights) Act, 2019<sup>1</sup> discusses prohibition against discrimination. It states that a transgender person shall not be discriminated against by any person or any establishment by denying, discontinuing, or treating them unfairly in educational institutions, employment, and occupation, healthcare services, or their right to move freely. It also states that a transgender person cannot be repudiated access to or enjoyment of goods, services, benefits, and privileges, nor can they be denied the right to purchase, rent, reside or inhabit any property. They can also contest for or stand to hold any private or public office. These rights will provide them with an equal stand and opportunity in the society, and the people can be punished in case any he/she does any discriminatory act towards a transgender.

Chapter III of the Act paves the way for the right of identity recognition of a transgender person. The District Magistrate can issue a certificate of identity if an application is made for the same by a transgender person, and after following

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<sup>1</sup> The Transgender Persons (Protection of Rights) Act, 2019, No. 40 of 2019 (Dec 5, 2019)

such procedures, one can obtain the certificate, which will act as identity proof for the concerned transgender person. A revised certificate may also be issued if the transgender person goes under surgery for changing the gender into male or female. A minor can also obtain such a certificate of identity, but the parent has to undergo the application process on behalf of the minor. This provision will help a child to recognize his gender identity from the initial stages of his childhood so that the child gets aware of the rights which have been guaranteed.

### **WELFARE MEASURES TAKEN BY THE GOVERNMENT**

Section 8 of the Transgender Persons (Protection of Rights) Act, 2019 mentions the measures which will be taken for the welfare of transgender persons, and such measures will be looked upon by the government. It states that steps should be taken by the government to ensure that transgender people take full and effective participation in the activities of society and should also look after their inclusion in society. It also states that the government should bring up welfare measure which would be directed towards the protection of rights and interests of transgender people. It would also ensure that transgender people get access to all the welfare measures taken up by the government. The government also needs to formulate strategies, schemes, courses of action, and programmes that need to be “transgender sensitive, non-stigmatising and non-discriminatory.”<sup>2</sup> The Act also states that government should take up appropriate measures for the promotion and protection of the rights of transgender people and encourage them to actively participate in activities focusing on culture and recreation which are being conducted in the society.

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<sup>2</sup> Transgender Persons Bill 2019, Drishti IAS (Dec. 6, 2019), <https://www.drishtiiias.com/daily-updates/daily-news-editorials/transgender-persons-bill-2019>

According to Section 13, every government-funded educational institution should offer inclusive education, sports and games, leisure and recreational activities to transgender people without discriminating against them, and these should be given on a fair and equal basis. Inclusive education as defined in Section 2(d) of the Act refers to “a system of education wherein transgender students learn together with other students without fear of discrimination, neglect, harassment or intimidation and the system of teaching and learning is suitably adapted to meet the learning needs of such students.” This would help the transgender people to stand equally with others in the society without any humiliation and embarrassment. The Act also emphasises providing vocational and professional training and education, and self-employment to transgender persons. Certain necessary steps regarding the offering of health services to transgender persons should be taken by the government, and this could include HIV surveillance centers and surgeries related to sex reassignment. The medical curriculum should be reviewed by the government for addressing the health issues of a transgender person and medical insurance schemes<sup>3</sup>

**NATIONAL COUNCIL FOR TRANSGENDER PERSONS**

The Act provides for the constitution of the National Council for Transgender Persons for the purpose of exercising the powers granted to it and for performing the functions for which its constitution has been made. The function of the Council is to formulate plans, policies, programmes, and projects for the welfare and upliftment of transgender people. The impact of policies and programmes will also be observed, analysed, and evaluated by the Council so that the transgender population could receive maximum participation in society. The

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<sup>3</sup> The Transgender Persons (Protection of Rights) Bill, 2019, Drishti IAS (Nov. 27, 2019), <https://www.drishtiiias.com/daily-updates/daily-news-analysis/the-transgender-persons-protection-of-rights-bill-2019>

Council will also function for coordinating and reviewing the functions and working of the governmental departments, NGOs, and other institutions of government. The aim of this Council is to redress the grievances of transgender people and provide them a better pathway for solving their problems.

The NCT will consist of Union Minister for Social Justice (Chairperson), Minister of State for Social Justice (Vice-Chairperson), Secretary of the Ministry of Social Justice, one representative from ministries including Health, Home Affairs, and Human Resources Development.<sup>4</sup> Other members include representatives of the NITI Aayog, and the National Human Rights Commission, and representatives of State governments and Union territories who will be elected on a rotation basis from all regions. The Council will also consist of five members from the transgender community and five experts from non-governmental organisations or associations working for the welfare of the transgender people and their community, and they will be elected by the Central Government.

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### BACKGROUND OF THE ACT

The Transgender Persons (Protection of Rights) Act, 2019 is a result of many historical and landmark cases. The Courts dealt with several issues and problems which was being confronted by transgender persons in society. The Transgender community has been fighting for the recognition of their rights for the past several years. The Transgender Community includes Hijras, eunuchs, Kothis, Aravanis, Jogappas, Shiv-Shakthis, etc., and they stand a great significance in the Hindu mythology and other religious texts belonging to other religions as well. The term ‘Napunsaka’ and ‘Tritiya Prakrti’ has continued to be a part of the Vedic and

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<sup>4</sup> The Transgender Persons (Protection of Rights) Bill, 2019, PRS Legislative Research, <https://www.prsindia.org/billtrack/transgender-persons-protection-rights-bill-2019>

Puranic Literature, which was used to refer to the ones whose procreative capability is absent. According to epic Ramayana, the Hijras decided to stay with Lord Rama when he was banished from the kingdom for 14 years, and impressed by this, Lord Rama gave them the power to bless people on auspicious occasions. Transgender also occupies a prominent role in Islamic texts, especially in the Ottoman Empire and Mughal period. The concept of ‘psychological sex’ has been used in Jain texts to refer to Transgender persons.

The Criminal Tribes Act, 1871 was introduced in the British period by the Colonial government. The Act banned and issued a warning against people who were engaged in the customary activities performed by the Hijra community, like dancing in public or dressing up in women’s clothing, stating that such people would be arrested and fined. The Criminal Tribes Act, 1871 created a category called ‘eunuch,’ which included hijras, khwajasaras, and kotis, specifically the gender non-conforming communities prevalent in India. Children living with the Hijra community were taken out of their care and protection, and it was found that those children had no other legal guardians or family except them, and most of them were orphans, which was a major reason that Hijras kept such children with themselves<sup>5</sup>. The Criminal Tribes Act also declared the keeping of a boy of 16 years of age with a registered eunuch as an offence that was punishable with two-year imprisonment or fine<sup>6</sup>. The provisions of this Act introduced by the British undermined the social stature of the transgender community, and they received a rejection from the society, and even allegations of kidnapping kids were put on them.

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<sup>5</sup> Hinchy & Jessica, *Obscenity, Moral Contagion and Masculinity: Hijras in Public Space in Colonial North India*, *Asian Studies Review*, 274–294 (2014)

<sup>6</sup> Criminal Tribes Act, 1871, Columbia Education,  
<https://cnmtl.columbia.edu/projects/mmt/ambekar/web/readings/Simhadri.pdf>



Indian Penal Code, 1860, much before the introduction of the Criminal Tribes Act, 1871, introduced Section 377. Section 377 states that if a person by his/her own choice indulges in penile- non-vaginal sexual acts with persons or animals, including anal or oral sex, such act will be considered as an offence and can be imprisoned for life or ten years with a fine. This section relates to the rights of transgender persons who are associated with such sexual activities. In the case of *Queen Empress v. Khairati*<sup>7</sup>, a transgender person on suspicion and after examination by a Civil Surgeon was arrested by the Police and got prosecuted under Section 377 stating that the person is a ‘habitual sodomite’ and afterward the person on appeal was acquitted. This case acts as an example of showing how transgender people and Hijras face harassment and physical abuse in society. In the case of *National Legal Services Authority v. Union of India*<sup>8</sup>, the Supreme Court took certain major decisions regarding the recognition of rights of the transgender community. This judgement led to the recognition of Hijras and eunuchs as ‘third gender,’ and transgender persons were given freedom of self-identified gender, which means that they will have the freedom to decide whether to be a male, female or third gender and that will get legal recognition. The Apex Court also ordered the Governments at the Centre and State level to take steps towards protecting them from shame, fear, social pressure and also ordered to formulate measures for providing them adequate healthcare and other welfare services<sup>9</sup>. This case put forward a number of positive actions for transgender persons and towards their recognition of rights. In the case of *Justice K.S. Puttaswamy (Retd.) and Anr. v. Union of India and Ors.*, the Apex Court decided

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<sup>7</sup> *Queen Empress v. Khairati*, (1884) ILR 6 All 204

<sup>8</sup> *National Legal Services Authority v. Union of India*, (2014) 5 SCC 438

<sup>9</sup> Lavina Bhargava, *Supreme Court Case Analysis: NALSA v. Union of India and Ors. (Transgenders Rights Case)* By: [Lavina Bhargava](https://www.latestlaws.com/case-analysis/supreme-court-case-analysis-nalsa-v-union-of-india-and-ors-transgenders-rights-case-by-lavina-bhargava/#_ftn1), Latest Laws (Jul. 2, 2018), [https://www.latestlaws.com/case-analysis/supreme-court-case-analysis-nalsa-v-union-of-india-and-ors-transgenders-rights-case-by-lavina-bhargava/#\\_ftn1](https://www.latestlaws.com/case-analysis/supreme-court-case-analysis-nalsa-v-union-of-india-and-ors-transgenders-rights-case-by-lavina-bhargava/#_ftn1)



that under Article 21, the right to privacy is considered as a fundamental part of the right to life and personal liberty and as a part of the freedoms guaranteed by Part III of the Constitution. The Court also stated that individual privacy and the legitimate aim should be balanced carefully because fundamental rights cannot be provided by or taken away by law and every law, Acts and regulations must be abided by the citizens<sup>10</sup>. The Hon'ble Supreme Court also stated that the LGBT community, despite being a minority community, cannot be denied the right to privacy as it would be violative of the fundamental rights as mentioned in the constitution. So, the right to privacy was extended to the LGBT community also, and this judgement is also a development towards recognition of the rights of transgender persons.

The landmark judgement of *Navtej Singh Johar & Ors. v. Union of India* declared that all consensual sex among adults would stand decriminalized, and this includes homosexual sex. Section 377 still contains and will treat issues related to indulging in sexual activity with minors, non-consensual sexual acts such as rape, and bestiality. The Supreme Court observed that if the sexual acts between two adults who consented for the same is criminalised, then it violates the right to equality, and the LGBT community of India must be given access to all constitutional rights. It was held that “the choice of whom to partner, the ability to find fulfillment in sexual intimacies and the right not to be subjected to discriminatory behaviour is intrinsic to the constitutional protection of sexual orientation”<sup>11</sup> The Court also stated that homosexuals face discrimination from the society and due to the fear of humiliation and punishment they start hiding

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<sup>10</sup> Ritansha Lakshmi, *Case Summary: Justice K. S. Puttaswamy (Retd.) vs. Union of India*, 2017, LawLex (Apr. 10, 2020), <https://lawlex.org/lex-bulletin/case-summary-k-s-puttaswamy-ret-d-v-s-union-of-india-2017/18929>

<sup>11</sup> Sakshi Tomar, “*Case Comment: Navtej Singh Johar & Ors. Vs. Union of India & Ors.*”, Pen Acclaims, <http://www.penacclaims.com/wp-content/uploads/2019/02/Sakshi-Tomar.pdf>

their gender identity. This also causes a path for untreated needs like healthcare, education, residence, employment, etc., of the LGBT community, which also includes transgender persons. The Court correctly said that denying the LGBT community the right to privacy is the same as refuting them a right to a dignified life and personal liberty under Article 21<sup>12</sup>. So, this case was a landmark decision for the whole LGBT community, and the transgender persons too got certain rights of recognition within the society.

The Transgender Persons (Protection of Rights) Bill, 2016 (No.210) was presented before the Lok Sabha on 2<sup>nd</sup> August 2016. This contained various provisions that were criticised and protested all over India by the Indian transgender persons and their community. The Bill was then sent to the standing committee for necessary changes, and the standing committee submitted its report in July 2018. The Lok Sabha then presented a new form of the bill on 17<sup>th</sup> December 2018 after making 27 amendments to it. This Bill too was criticized and protested in all parts of India as it was stated that the suggestions made by the transgender persons were ignored, and the recommendations of the standing committee were not counted in the Bill. The Bill lapsed due to this. So the Bill was again presented in Lok Sabha on 19<sup>th</sup> July 2019, which was just after the 2019 general elections. The Bill was presented in Rajya Sabha by Thawar Chand Gehlot on 20<sup>th</sup> November 2019 and was approved on 26<sup>th</sup> November 2019 without making any amendments. President's assent was granted on 5<sup>th</sup> December 2019, and the Act came into effect on 10<sup>th</sup> January 2020.

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<sup>12</sup> Ritwik Guha Mustafi, *Case Comment on Navtej Singh Johar v. Union of India*, iPleaders (Nov. 22, 2019), <https://blog.ipleaders.in/case-comment-navtej-singh-johar-v-union-india/>

## ISSUES WHICH THE BILL FAILED TO ADDRESS

The Transgender Persons (Protection of Rights) Bill, 2019 was heavily criticized by the transgender community and activists working for their welfare. The transgender activists and representatives termed the day on which the Lok Sabha approved the Bill as ‘Gender Justice Murder Day.’ The trans community voiced their opinions and criticisms through conducting multiple press releases, protesting on streets, conducting conferences, and speaking about the matter on social media platforms. The Bill failed to address several concerns and opinions raised by the transgender community. First of all, it failed to clarify and correctly interpret the definition of ‘family’ as mentioned in the Act. Section 2(c) of the Transgender Persons (Protection of Rights) Act, 2019 defines ‘family’ as a group of people related by blood or marriage or by adoption made in accordance with the law.’ The transgender community criticized this definition by stating that despite making several clarifications by them to extend the definition of family, the concerned authorities failed to understand that most transpersons do not live with their biological families due to discrimination and rejection faced there, and so the definition must have included ‘chosen family’ within its ambit. The transgender community also stated that though a definition for ‘persons with intersex variations has been inserted in the Bill and Act, it fails to address the concerns of intersex persons.

An expected 1.7 percent of the worldwide population can be termed as ‘intersex’ as they are born with certain bodily characteristics that are not according to the female or male body features and traits. So this makes it necessary that the Act must have included separate provisions for intersex persons because their health concerns and many other issues need to be addressed separately. The process of recognition of identity, as mentioned in the Act, was claimed to be flawed too.

The bill provides for the process of legal gender recognition, which is a two-step process. First, it needs a transgender person to apply for a “transgender certificate.” Such a person can perform this step through their self-declared identity. Then, a certificate holder can apply for a “change in gender certificate,” which gives an indication to the authorities to change the legal gender to male or female of such persons. Secondly, the surgery is required, and then the medical authority gives confirmation through the documentation process.<sup>13</sup> The deciding power is given to the District Magistrate, who issues a certificate which is based on a set of documents; the question arose as to what are the set of documents prescribed, and this was absent in the Act. ★

The composition of the National Council for Transgender Persons, which is created for ensuring proper functioning and implementation of the provisions of this Act, is not properly balanced. There are at least 30 representatives and officials of various ranks in it, but only five representatives from the transgender community and five experts related to organizations working for their welfare, including activists. This again makes the voice of the transgender community a minority in the midst of all other representations. Section 8(4) of the Transgender Persons (Protection of Rights) Act, 2019, which includes the clause of ‘rescue, protection, and rehabilitation,’ was also criticized by the transgender community. The transgender persons claimed that the experience of trans persons in shelter homes, rescue centres, and rehabilitation centres were neglected in the Act. They have to face various forms of abuse, including mental, physical, sexual, and emotional abuse during their stay in these shelter homes.<sup>14</sup> They showed their

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<sup>13</sup> Human Rights Watch , *India: Transgender Bill Raises Right Concerns*, (Jul. 23, 2019, 1:06 AM), <https://www.hrw.org/news/2019/07/23/india-transgender-bill-raises-rights-concerns>

<sup>14</sup> **Rachana Mudraboyina, Sammera Jagirdar and Philip C. Philip, *A Critique Of Transgender Persons (Protection Of Rights) Bill, 2019, Feminism In India (Aug. 5, 2019)*, <https://feminisminindia.com/2019/08/05/critique-transgender-persons-protection-of-rights-bill-2019/>**

concern towards how these shelter homes and other rehabilitation establishments are run and managed, which shows how insensitively their concerns, needs, and requirements are looked after.

The Act did not state any provision regarding the improvement of the environment in the shelter homes and protection of the transgender persons from facing abuse in the shelter homes and rehabilitation centres. Many transgender came with a concern that in case of sexual assault to transgender persons, the accused faces maximum imprisonment of two years, whereas when a woman is sexually harassed, the imprisonment is a minimum of seven years, and this is a display of inequality and discrimination which transgender persons have to face in their daily lives and their lives and wellbeing are not given equal importance as others. The Act only mentions penalties for sexual abuse and ignores extensive crimes such as rape committed to a transgender person. Trinamool Congress MP asked, “The message is, rape a woman; yes, very bad; rape a child, worse; but, the transgenders, these people are on streets, they are begging, they are under high risk, and what is this bill that we are passing?”<sup>15</sup> Many such issues, concerns, and criticisms were raised by the transgender community for opposing the Bill. A law student from Bengaluru named **Liliana il Graziosco Merlo Turan** said “This Bill exists to erase us. By having complete control over us from the way we identify to what socio-economic opportunities we should get and condoning violence against us, it places us in a vulnerable position,”<sup>16</sup>

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<sup>15</sup> Vijayata Lalwani, *What next for transgender people, as India clears a bill that activists call ‘murder of gender justice’?* Quartz India (Nov. 27, 2019), <https://qz.com/india/1756897/indias-transgender-rights-bill-disappoints-the-lgbtq-community/>

<sup>16</sup> Sasha R., *Trans Bill 2019: Why India’s transgender community is opposing a Bill which is supposed to protect their rights*, Your Story (Nov. 30, 2019), <https://yourstory.com/socialstory/2019/11/stoptransbill2019-india-transgender-community-rights>

## COMPARISON OF THE ACT WITH LAWS PREVALENT IN OTHER COUNTRIES

Transgender people face the same type of discrimination and rejection in society in every part of the world, but the laws, regulations, rules, and legislation are different all across the globe. Recently, the Supreme Court of the United States (SCOTUS) gave a landmark judgement in the case of R.G. & G.R. Harris Funeral Homes Inc. v. Equal Employment Opportunity Commission, which directly affected the transgender community. SCOTUS stated that Title VII of the Civil Rights Act, 1964, which provides for the protection of sex discrimination in employment, will be now extended and will be applicable to the transgender employees also. This was the first judgment in the US that directly focused on the rights of the transgender community. Changing of names in US jurisdictions and laws related to them are complex and a mixture of both federal and state rules. The US States vary in their ways of recognizing gender identities of transgender persons, with some states considering hormone therapy, psychological therapy, and some states look at Sex Reassignment Surgery for their recognition. There is no federal law in the US that recognises transgenders as a class that is protected or a class which is demanding equal treatment. Many US states have passed ‘bathrooms bills’ which restrict transgender persons from using the bathrooms, and they are forced to choose the bathrooms according to their biological sex. These kinds of discrimination are faced by the transgender community everywhere.

The United Kingdom has several laws to protect and support the transgender community. Gender Recognition Act, 2004 was introduced in the UK to enable people to obtain a new birth certificate and enjoy all the legal rights allowed to their acquired gender, which also includes same sex marriage. In the UK, they

also restrict transsexual people from participating in certain sports events if it violates the right to fair competition to other participants or if the participation of transsexual people poses a threat to others. The Equality Act, 2010 in the UK states that people should not be discriminated based on their physiological reassignment of attributes of their sex.<sup>17</sup> UK's National Health Service also provides mental healthcare treatment to people suffering from Gender Dysphoria.

Canada has its own legislation for the transgender community. In June 2019, Canada declared that every citizen would have the right to live with their own identity. So, the people who identify themselves as neither men nor women can have an 'X' printed on their passport, travel documents, permanent resident certificates, and citizenship certificates.<sup>18</sup> So different countries have different ways of protecting discrimination and granting equal rights to transgender people, but still, the problem prevails in each and every country.

## CONCLUSION

In this modern era, when the world is excelling towards technology and greater progress, there exist communities still fighting for their basic rights. They are fighting for their thirst for recognition and protection against discrimination. The Transgender Persons (Protection of Rights) Act, 2019 aims towards the protection of the transgender community from discrimination and recognizing their legal rights and the right to live as equals as others. The Act should have included more suggestions from the community itself who know about their needs better, and more focused and clear provisions could have made. India should take suggestions, references, and examples from the laws being followed in other

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<sup>17</sup> Transgender Laws, GenderTrust, <http://www.gendertrust.org.uk/transgender-laws/>

<sup>18</sup>Government of Canada, *Canadians can now identify as gender "X" on their passports*, (Jun. 4, 2019) <https://www.canada.ca/en/immigration-refugees-citizenship/news/notices/gender-x-documents.html>



countries of the world. Despite the inclusion of such broad provisions, the Act failed at many stages, and the transgender people as a whole remain unsatisfied and deprived of their needs till date. Every citizen of a country should be given equal rights as others and also should be given recognition similar to others. The State has the duty to protect the citizens from discrimination as in this case based on gender recognition. Transgender persons should be treated as equal to other citizens and should be given more comprehensive and targeted laws. These points, when considered seriously, will lead the country towards a more progressive state, and the transgender community will be able to lead a happier and secure lifestyle.



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