



THE RIGHTS AND STATUS OF LGBTQ+ PEOPLE IN INDIA

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ABSTRACT:

LGBTQ+ has become a widely accepted designation for minorities based on sexual and gender orientation. LGBTQ+ groups are suffering from socio-economic, and cultural injustice. lack of social recognition prevents them from fully accessing and enjoying their rights as a citizen. LGBTQ+ groups experience intolerance, harassment, the threat of violence, and discrimination due to their sexual orientation. this group suffered a lot from society and family. Still, LGBTQ+ people are deprived of Legal and social status. The social structure in India didn't contribute to facilitating this vulnerable section. The problem they face needs a proper solution and awareness about them is very important because, like each other gender, they also have the right to equality and honour. They are not different from males and females, so treating them differently needs to stop. This paper aims to present the challenges and the problems they face to fit in this society. This paper also focuses on analysing the effectiveness of legal and constitutional provisions on various issues and challenges faced by the LGBTQ+ in India. The focus shall also be on the judicial perspective and the contribution of the Supreme Court in analysing and providing a liberal interpretation to protect the interests of LGBTQ+ groups. This paper also makes suggestions for the implementation of laws and the protection of LGBTQ+ groups.

Key Words: LGBTQ+, Social acceptance, Discrimination, harassment, Challenges.

1. INTRODUCTION:

The word "LGBTQ" encompasses a broad range of individuals who do not fit inside the heteronormative definitions of sex and gender. Since the term lacks a definitive definition, the abbreviation is frequently used with a plus symbol (+) to indicate that the collective is not all-inclusive. However, lesbian, gay, bisexual, transgender, and queer is what the phrase stands for. It speaks to aspects of gender and sexuality simultaneously. Gay, lesbian, and bisexual are terms used to describe a person's sexual preferences; transgender people do not identify with the binary distinction between male and female genders. The collective's "queerness" is commonly

denoted by the term "queer." The phrase encompasses other categories such as intersex, asexual, and so on. This is a complicated concept that calls for knowledge of gender and sexuality as facets of the human experience. This group questions the heteronormative standard that has been the norm and seeks to establish their own identities within the range of gender and sexuality.

Social acceptance of the LGBTQ community has advanced significantly on a global scale. In India, the community has long been saved by the judiciary throughout a protracted struggle. Section 377 of the Indian Penal Code, which has since been repealed, was one among the laws that persecuted sexual minorities under the English-based Indian legal system¹. The section that classified unnatural offences included the LGBTQ community and led to an atmosphere of violence, oppression, and terror from both the police and the broader public. The Supreme Court's ruling gave the community a legal basis and marked a major advancement in the normalisation of the concept of sexual minorities in India. Despite strong criticism directed towards the legal enactment created for them, transgender individuals have a more favourable status as a result of their acknowledgement as members of the third gender. Sexual minorities are compelled to live in secrecy and have experienced systemic oppression. there is an obvious lack of awareness, and discrimination can be seen in many different ways. For example, transgender people are excluded from social organisations and are not allowed to work. They are also denied the rights to marriage, reproduction, and adoption/maintenance for same-sex couples. Nonetheless, social rights continue to be denied even after decriminalisation; one such right is the marriage rights of same-sex couples, which is currently being challenged in Indian courts. The community has to take this clear next step to guarantee everyday living, but it is very difficult because of the government's persistent opposition.

LGBTQIA+:

L- Lesbian means a woman who is sexually attracted to women.

G- Gay means a man who is sexually or romantically attracted to men.

B- A person who identifies as bisexual is drawn to both men and women sexually.

T- Transgender refers to people whose gender identity, expression or behaviour is different from those often connected to their birth and assigned sex.

Q- Queer, this is an umbrella term for those who wish not to categorise sex, sexuality or gender.

I-Intersex refers to a person who is born with reproductive or sexual anatomy that does not fit the typical male or female anatomy.

A-Asexual refers to a person who does not feel any sexual attraction.

+ - everyone else who doesn't fit into one of the aforementioned groups.

¹ Indian penal code 1860 I.P.C. § 377 (lexis nexis 2012).

1.1.OBJECTIVE OF THE STUDY:

- To analyse Legal provisions.
- To discuss Constitutional protection for LGBTQ minorities in India.
- To highlight some significant problems and challenges faced by LGBTQ within society.
- To provide suggestions to improve their status in India.

1.2.RESEARCH QUESTION:

1. What is the role of the Judiciary with regard to decriminalizing section 377?
2. What is the present scenario of LGBTQ+ people in Indian society?
3. Various issues and challenges faced by the LGBTQ+ community?
4. Recommendation for better implementation of laws and protection of LGBTQ+ groups.

1.3.RESEARCH METHODOLOGY:

The methodology adopted by the researcher for conducting research is the doctrinal research method, the data has been collected from various articles, a review of literature, a history of homosexual etc.

1.4.HYPOTHESIS:

There is a need for separate laws for LGBT minorities in India so as to deal with various challenges and issues faced by them in various aspects of their legal and social life.

2. HISTORY OF LGBTQ:

The LGBT community in the Republic of India has a long history, but in recent years, a lot of study and opinions have been conducted on the subject thanks to the legalisation of homosexuality and the promotion of LGBT rights. In Indian history, no one has been put to death for engaging in sexual behaviour. Despite the fact that anti-homosexuality legislation has resulted in arrests, no one is known to have committed homosexuality in India after independence.

Prior to colonisation Numerous Historical Indian writings have implications for current LGBT issues. A wide range of nonvaginal sexual practices—whether or whether they were carried out with a man or a woman—are mentioned in the Arthasastra, an ancient Indian text on diplomacy that was intended to result in a low grade of fine. While heterosexual relationships were penalised more harshly than homosexual relationships, homosexual relationships were regarded as relatively minor offences. Girls who were not virgins paid a pitiful fine for having sex, while men who engaged in gay activity were ordered to shower wearing only one piece of clothing and do a one-night fast as a penance.” - the penance being the substitution of the conventional model of homosexual sex that results in caste loss. Male homosexuality "is not solely universal in practise among them, however extends to a beastly communication with brutes, and above all with sheep," according to a Dutch traveller who lived during the Mughal era.

Colonial Times Section 377 of the Indian Penal Code, which went into effect in 1861, forbade homosexual relations in India during the British colonial era. The majority of the British Empire was uniformly implemented because to the Christian spiritual convictions of the colonial administrations of Britain.

Current India Shakuntala Devi published the first study on sex in India in 1977. Human Rights Watch has reported that the law was used to harass HIV/AIDS prevention activists, sex workers, men who have sex with men, and various LGBT groups. Although convictions under Section 377 were uncommon—there were not even any convictions for homosexual intercourse in the twenty years leading up to 2009—the organisation nonetheless notes that the law was used to harass these groups. The collection of records reveals that four persons were arrested in Lucknow in 2006 and four more in 2001. Up until 2009³⁸, homosexual relations were illegal under Section 377 of the Indian Penal Code, 1860. Additionally, this said that engaging in "carnal intercourse against the order of nature voluntarily" was illegal.

From 2009 to 2013 The 2009 Delhi High Court ruling in Naz Foundation v. Govt. of NCT of Delhi² overturned the statute, concluding that Section 377³ and other legal restrictions against same-sex conduct were a clear infringement of the rights guaranteed by Part III of the Indian Constitution. High Court rulings regarding the constitutionality of laws (judicial review) are applicable across the Republic of India and are not limited to the portion of the state that the court has jurisdiction over³⁹. However, there are (rare) instances of harassment of homosexual teams even after the ruling has been announced. The Supreme Court found that sex should be seen in the context of a dynamic society on February 16, 2012, when considering a number of appeals filed against legislation decriminalising gay sex. Over time, some acts that were formerly considered unpleasant have become accepted.

The two-judge bench, which included Justices G.S. Singhvi and S.J. Mukhopadhyaya, held that sex should be viewed in the context of changing times, in which live-in relationships, single parenting, and artificial fertilisation have become commonplace. They also noted that a number of practises that were deemed immoral twenty years ago have now gained social acceptance. Political, social, and non-secular groups, as well as anti-gay rights campaigners, filed petitions with the Apex Court challenging the Delhi High Court's decision to decriminalise homosexual activity. But on February 23, 2012, in response to a Supreme Court observation, the Union Home Ministry of the United Progressive Alliance (UPA) informed the court that it was categorically opposed to the decriminalisation of homosexuality. "This goes against social order and is incredibly immoral," the Home Ministry informed the supreme court. It stated that India's social and ethical norms should not be influenced by those of other nations since they are entirely unique.

On February 28, 2012, the Supreme Court changed its position and declared that decriminalising homosexual sex was the right decision. As a result, the Apex Court decided to tell the Government, "Don't create a mockery of the system and don't waste the courts time." The SC pulled up the Centre for repeatedly shifting its position on the issue. Section 377, a legislation from the 153rd year of colonialism, has been interpreted historically in India to condemn same-sex partnerships as a "unnatural offence" and to carry a ten-year jail

² Naz Foundation v. Govt. of NCT of Delhi, Delhi Law Times 277 (Delhi High Ct. 2009).

³ Indian penal code, 1860, sec. 377, the parliamentary law, 1980

sentence. Following the 2009 court decision, political, social, and non-secular religious groups petitioned the Supreme Court to have the law reinstated.

Since 2013 Across India, there were protests against the reinstatement of Section 377, which sparked political activism from various political parties endorsing the legislation' repeal. At least three major political parties—the Aam Aadami Party, the Congress, and the Communist Party of India (Marxist)—had included support for decriminalising homosexual relations in their election manifestos by April 2014, the month of the impending election, while the leadership of the BJP was in favour of the legislation. At the Sixth Hindu Religious Service Foundations Sixth Service Fair in Chennai in the sixth month of 2014, BJP state general secretary Vanathi Srinivasan released the first Tamil book on LGBTQIA issues and a book on gender queer issues written by Srishti Madural. Amour Queer Dating, a dating app for LGBTQIA people looking for a partner, was introduced in India in the fifth month of 2016.

2.1.THE CHALLENGES FACED BY LGBTQ:

It is quite improbable that someone who identifies as LGBT will be welcomed into society with open arms. They typically face discrimination because of their sexual orientation. As a result, individuals encounter several issues such as:

Marginalisation: One of the biggest issues facing homosexuals is marginalisation. Treating someone as peripheral is known as marginalisation. Occasionally, people experience social rejection, making it challenging for them to lead independent lives. They receive bad sentiments from society and are stigmatised. They wish to be involved in all aspects of society, but because they are marginalised, they are not able to do so equitably. We can refer to it as homosexuals' societal marginalisation. The marginalisation of LGBT individuals frequently originates with their birth family. Research indicates that in the United States of America, 8% of transgender individuals reported being homeless at some point in the previous year. Housing instability affected 6% of sexual minorities who were African Americans. Twenty percent of sexual minorities were homeless before the age of eighteen, and seventy-one percent became homeless for the first time as adults.

Harassment and Torture: It is rare to find an adolescent identified as homosexual who has not experienced harassment or torture at school from peers. The LGBT community faces difficulties everywhere; it's not just in schools. Members of the community also encounter harassment on the streets. Lesbians, homosexual men, transgender women, and bisexuals endure sexual violence more frequently than do heterosexual persons. In the National Intimate Partner and Sexual Violence Survey, the Centres for Disease Control and Prevention (CDC) discovered that:

Compared to 35% of straight women, 44% of lesbians and 61% of bisexual women report being raped, physically abused, or stalked by an intimate relationship.

Compared to 29% of straight males, 26% of homosexual men and 37% of bisexual men report being raped, physically abused, or stalked by an intimate partner.

Compared to 21% of straight males, 40% of homosexual men and 47% of bisexual men have suffered sexual violence other than rape.

Rejection: There are two main sorts of rejection that LGBT persons encounter: rejection from the family and rejection from society. A gay or lesbian person is always shunned by society if they identify as such. Even when family members are aware that a child is homosexual or lesbian, they still choose to ignore or marginalise that child.

Homelessness: One of the largest issues LGBT people confront is homelessness. Forty percent of LGBT individuals in New York live on the streets as homeless. For being gay, they are only kicked out of their houses. They are also turned away from even domestic violence shelters. As a result of their homelessness, these individuals develop drug addictions or occasionally turn to prostitution. They also need to handle their financial issues.

Mental Weakness: One common outcome that occurs in the minds of LGBT individuals is mental weakness. They are typically shunned by friends, family, and society at large when they need company or assistance. They begin to experience mental health problems, such as depression, as a result of this kind of rejection. They sometimes make attempts at suicide or self-harm. This suicidal attempt is frequently witnessed in the minds of LGBT individuals.

2.2.REASONS FOR THE VARIOUS PROBLEMS FACED BY LGBTQ:

Appropriate sex education is lacking. Sex education is essential to our maturation process even if the concept of sex is still highly taboo in our culture. That being said, we have made significant progress, with teens in today's culture having a far higher knowledge of the importance of bees and birds. But things are not looking good for LGBTQ people growing up in Indian society. Until we really start conducting some useful "research," the majority of us have no idea how to go about becoming dirty.

Health problems are ultimately disregarded When I was younger, I thought that the only risks that come with having sex were unintentional pregnancy and STDs. However, there is a plethora of unspoken health issues associated with homosexuality. There are many sexually transmitted diseases (STDs) in the world, and due to a lack of knowledge, we frequently overlook health risks that could endanger us.

Apart from the far too often physical attacks that members of the LGBT community endure, there is no end to the derogatory labels and homophobic epithets that they must endure on a daily basis. It is simply not cool when the labels "gay" and "faggot" are used carelessly and possess a blatantly negative meaning. The term "gay" is not derogatory.

The majority of people still reject being gay as a mental disease. The shocking lack of understanding persists even in this era of information. And not just among the millennial generation, but also among the elder generation that struggles to accept the existence of alternative sexualities. Finding young, presumably intelligent people spreading uninformed beliefs is quite depressing.

Every time they meet someone new, they have to go through the experience of coming out. One of the most turbulent and painful experiences a person may have in life is coming out to loved ones about their sexuality. Even though they survived the experience unharmed, it is not a very inviting possibility for them to share their sexuality with everyone they encounter. Apart from the frequent passing of hasty judgements, there's a chance of being attacked and shunned for being authentically themselves.

Sexual assault against LGBTQ+ people does occur. The group that shuns victims of same-sex sexual assault accuses them of ruining their wonderful vision with the thought of inconvenient victimhood, while specialists trained to handle male-on-female rape are blind to the existence of these victims. Many people still find it hard to accept that a woman might actually rape someone. While acknowledging the truth draws comparisons to a predatory, nasty lesbian, doing so will not stop the pandemic of assaults against LGBT people.

Uncomfortable, intrusive questions all the time Although people are more than welcome to inquire about and get any doubts about other sexualities cleared up, it is impolite to demand to know specifics about someone's private sexual life.

There are underlying issues in the neighbourhood. This one instance of a very clear classist attitude was displayed at Jantar Mantar, where community members and allies gathered to protest the recriminalization of Sec 377. Even if the working class and lower middle class are also part of this "minuscule minority," the national campaign for LGBT rights is fundamentally elitist. It has been really upsetting to witness folks on stage discussing how they were made fun of by apparently intelligent friends for having poor pronunciation. Gay men are still perceived by the public as sculpted slabs of muscle cake, and there is a lot of pressure to live up to this image in order to be taken seriously by the community and when looking for a mate.

2.3. IMPORTANCE OF LGBTQ+ RIGHTS:

1. Everyone ought to be pleased with who they are and who they care about.
2. It will save lives to eradicate homophobia and transphobia.
3. We may learn how to eliminate many of the restrictions imposed by gender norms by accepting and comprehending the identities of LGBTQ+ persons.
4. Members of the LGBTQ+ community, particularly those who identify as transgender or gender non-conforming, frequently face social and economic marginalisation.

3. LEGAL PROVISIONS AND CONSTITUTIONAL PROTECTION:

LGBTQ+ Minority People's Right to Privacy The right to privacy is a part of the rights to life and private liberty. Although the right to privacy is not expressly stated in the Indian Constitution as one of the essential rights, it is still regarded as such since the Supreme Court has emphasised it on occasion and in some instances. Therefore, the state cannot, under any circumstances, restrict someone's right to privacy.

Right to equality provided under Article 14, declares that no one living on Indian territory may be denied equality before the law or equal protection under the law by the state.

Non-discrimination is provided under article 15 The state is forbidden by Articles 15(1) and 20 from treating any citizen unfairly on the basis of their religion, caste, race, sex, place of birth, or any combination of these.

Section 377 of the Indian Penal Code in 1860, it made it illegal for any man, woman, or animal to voluntarily engage in sexual relations with another person or animal "against the order of nature." The maximum penalty for this offence is ten years in prison and a fine. Given that it criminalises a few sexual activities and their identities, the section seems neutral. It has, however, been used against homosexuals and has never been used against consensual heterosexuals. The first problem with the law is that it doesn't consider consent or age. Consequently, it makes consenting adult same-sex acts illegal. It all began with the Naz Foundation's appeal before the Delhi High Court.

4. ROLE OF JUDICIARY:

Decriminalising section 377 of the Indian Penal Code was made possible in large part thanks to the Indian judiciary. However, it is important to remember that section 377 is not completely decriminalised. Numerous High Courts and the Supreme Court have rendered significant rulings that have unambiguously affirmed gay conduct as a natural state rather than a crime. The so-called "sodomy law," or section 377, which imposes a life sentence for having sex, has finally been overturned. The legal precedents listed below will aid in understanding the Indian judiciary's contribution to the decriminalisation of section 377.

The Delhi High Court heard a challenge to the legality of section 377 of the IPC in the Naz Foundation case⁴ (I). The petitioner argued that section 377 manifestly violates Articles 14, 15, and 21 of the Indian Constitution. According to Article 14, everyone has equal status and is equal in the eyes of the law. Article 15, which forbids discrimination based on caste, sex, or any other factor. Article 21 addresses the right to privacy and life. LGBT individuals continued to face discrimination and harassment in spite of constitutional mandates. As a result, section 377 continued to have an impact on LGBT people's human and fundamental rights. Additionally, the petitioner argued that the contested part discriminates based on sexual orientation, which is a personal decision made by each individual. According to the Delhi High Court, it is not illegal for two people of the same sex to engage in sexual behaviour with each other's agreement. If it qualifies as a crime, it violates a fundamental right that the Constitution safeguards.

Case II: Naz Foundation⁵: In the first Naz Foundation case, the Delhi High Court ruled in favour of the Naz Foundation, citing section 377 as illegal due to its violation of fundamental rights under the Constitution. But in this particular instance, the Supreme Court reversed the Delhi High Court's ruling and reinstated section 377 of the Indian Penal Code as a crime.

⁴ Naz Foundation v. Govt. of NCT of Delhi, 160 Delhi Law Times 277

⁵ Suresh Kumar Kaushal v. Naz Foundation, Civil Appeal No. 10972 OF 2013

Union of India v. National Legal Service Authority⁶: In this case, the Supreme Court ruled that individuals of the third gender had an equal right to protection under the Indian Constitution. The Court further said that psychological sex, not biological sex, should be the basis for gender identification.

Puttaswamy case⁷: Also referred to as the Aadhar ruling, the court determined that the right to privacy is a fundamental component of the Indian Constitution and stems from Article 21. In this instance, it was determined that everyone has the right to privacy, regardless of their sex or gender. LGBT individuals should have state protection when they select their partners. Additionally, LGBT individuals have the freedom to choose whoever they want under the right to privacy.

Navtej Singh Johar Case⁸: In this case, a writ petition was filed contesting the constitutionality of section 377 of the Indian Penal Code, which makes it illegal for two adults of the same sex to have consensual sexual relations. The petitioner argued that Article 21 of the Indian Constitution guarantees the right to life and the right to privacy, which include the right to sexuality and the right to select a sexual partner. He further argued that because section 377 breaches Articles 14, 15, and 19, it is unconstitutional. The respondents argued that as section 377 merely specifies an offence and its penalty, Article 14 is not violated. Furthermore, it was argued that whereas Article 15 forbids discrimination on the basis of sexual orientation, it does not prevent discrimination based on gender, race, caste, sex, or place of birth.

The five-judge panel decided unanimously that the Indian Penal Code's section 377 is unconstitutional when it comes to regulating intercourse between two adults who are of the same sex. Furthermore, the Honourable Court ruled that this section of the IPC violates Articles 14 and 15 of the Constitution by discriminating against LGBT people based only on their sexual orientation. In addition, the court ruled that Article 19 (1) (a) of the Constitution is violated by section 377 of the IPC, which prevents LGBT persons from realising who they are. As a result, the supreme court declared that Section 377 of the Indian Penal Code was unconstitutional and removed the criminalization of consenting to sexual relations between two adults of the same sex.

Madhu Bala v. State of Uttarakhand & Ors⁹: Meenakshi and Madhu Bala, the two women involved in this case, had been dating since 2016. As adults, they freely chose to live together. Meenakshi's mother and brother wrongfully placed her in confinement. Madhu Bala as a result submitted a habeas corpus petition. It has been made clear by the Uttarakhand High Court that a couple of the same sex is allowed to remain together. Despite the fact that same-sex couples are currently not permitted to marry, living together is not illegal for them. The court further declared that the freedom to select a spouse and live together are essential components of the right to liberty. The court also stressed that once an individual reaches the age of majority, their freedom cannot be restricted because by law, they are able to make their own decisions. Ultimately, the court reaffirmed that there is no legal prohibition on two adults of the same sex having a consensual relationship.

⁶ NALSA v. Union of India & Others, Writ Petition (civil) No. 604 of 2013

⁷ Justice K.S. Puttaswamy v. Union of India, AIR 2017 SC 4161

⁸ Navtej Singh Johar v. Union of India, AIR 2018 SC 4321

⁹ Habeas Corpus Petition No. 8 of 2020

5.CONCLUSION AND SUGGESTION:

It is evident that LGBTQ+ people, who essentially have a different sexual orientation, frequently encounter barriers to meeting their requirements since they are subject to discrimination and social marginalisation. This ostracism and exclusion can range from straightforward interpersonal interactions to widespread social ignorance, ostracism, working together concurrently, and even violating someone's right to life. People who identify as lesbian, gay, bisexual, or transgender have long supported racial and economic justice. LGBTQ+ activists and organisations are highlighting the parallel experiences of oppression and privilege that people with multiple, layered identities and multiple community memberships have, and drawing links between the LGBTQ+ rights movement and the movements for economic and racial justice. The issues that many LGBTQ+ individuals face worldwide cannot be solved quickly or easily. As a result of the foregoing discussion, the advice that follows can be formed to recognise the role that both individuals and institutions can effectively play:

1. Show support for the most marginalised members of the LGBTQ+ community, including transgender, young, old, low-income, and people of colour.
2. Form partnerships for work on intersectional issues involving LGBTQ+ concerns that impact low-income and people of colour groups.
3. Involve foundation employees in educating the public about challenges impacting LGBTQ+ individuals from low-income backgrounds and LGBTQ+ individuals of colour, particularly in relation to transgender concerns.
5. Keep LGBTQ+ problems at the forefront of all racial and economic justice efforts.
6. Promote LGBTQ+ racial and economic justice efforts with your peers in the philanthropy community.
7. The media must take responsibility for changing society perceptions by covering LGBTQ+ topics and encouraging a climate of tolerance and freedom for minorities.
8. It is necessary to establish legal funds capable of handling public interest litigation concerning LGBTQ+ matters.
9. Health professionals should have more training so they can better grasp LGBTQ+ identification as a potential risk factor for depression, suicidal thoughts and behaviours, and self-harm. Respective authorities should make sure that LGBTQ+ persons may access and be appropriately served by health, mental health, and social care services.
10. Both the federal and state governments ought to provide programmes to assist employers in creating an environment and culture that are more accepting and inclusive of LGBTQ+ individuals.
11. The domestic violence law needs to be extended to cover non-spousal and parental abuse in order to curb violence that is committed both in the house and in public.
12. All levels of the police force should be made aware of LGBTQ+ concerns and the broad guidelines for basic human rights.

13. Phrases like "sexual deviate" and "sexual invert" that stigmatise or pathologize gay men, lesbians, and bisexual people should be avoided.

14. There is a need for increased education among local authorities, policy makers, schools, and families regarding the acceptance of gender-variant children, treating individuals of diverse sexual orientations and gender identities equally, and implementing policies and programmes in a friendly rather than hostile manner.

15. As seasoned leaders start handing the baton to younger ones, the LGBTQ+ movement is going through a leadership change. Baby boomers make up a large number of important LGBTQ+ organisation leaders. They will need to leave a lasting legacy so that future leaders can build on their ground-breaking efforts.

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