

REVIEW ARTICLE

Civil Registration, Legal Reforms, Public Health, and SDG 16.9: Catalyzing Social Inclusion for Transgender Persons in India

Om Prakash Bera¹, Vandana Shah², Mokshada Chandge³, Ranjit Singh⁴, Arshdeep Singh⁵, Lalita Kumari⁶, Shuchi Sharma⁷

¹Regional Advisor-Asia (Civil Registration and Vital Statistics, Non Communicable Disease), Global Health Advocacy Incubator, India;

²Vice President, Health Systems Strengthening, USA

³Member, South Asia Public Health Law Network;

⁴Advocate, Supreme Court of India;

⁵Department of Community & Family Medicine, All India Institute of Medical Sciences, Rishikesh;

⁶Senior Program Manager, Saptashrungi Bahuddishiya Mahila Sanstha, Maharashtra;

⁷Guru Bhakti Kalyan Samiti, Rajasthan

CORRESPONDING AUTHOR

Dr Om Prakash Bera, Regional Advisor-Asia (Civil Registration and Vital Statistics, Non Communicable Disease), Global Health Advocacy Incubator, India.

Email: dromprakashberapgi@gmail.com

CITATION

Bera OP, Shah V, Chandge M, Singh R, Singh A, Kumari L. Civil Registration, Legal Reforms, Public Health, and SDG 16.9: Catalyzing Social Inclusion for Transgender Persons in India. Indian J Comm Health. 2025;37(1):15-21. <https://doi.org/10.47203/IJCH.2025.v37i01.004>

ARTICLE CYCLE

Received: 16/01/2025; Accepted: 18/02/2025; Published: 28/02/2025

This work is licensed under a Creative Commons Attribution 4.0 International License.

©The Author(s). 2025 Open Access

ABSTRACT

Civil registration is a crucial process for documenting vital life events such as births, deaths, and marriages, which form the foundation of an individual's legal identity. For transgender persons in India, this process has historically been fraught with challenges, including systemic discrimination, bureaucratic hurdles, and a lack of inclusive legal frameworks. This paper examines the evolving landscape of civil registration for transgender individuals, focusing on legislative measures like the Transgender Persons (Protection of Rights) Act, 2019, and 2023 amendment to the Registration of Births and Deaths Act, 1969. By analysing key judicial interventions, such as the NALSA judgment of 2014, and exploring international best practices, this study identifies gaps and proposes actionable recommendations to enhance inclusivity. It highlights the importance of simplifying procedures, raising awareness, and protecting data privacy to ensure that transgender persons can access their right to civil registration without discrimination. The findings underscore the critical role of legal recognition in fostering equality, dignity, and social inclusion for transgender individuals in India.

KEYWORDS

Civil Registration and Vital Statistics (CRVS); Gender and Sexuality; Legal Frameworks in India; Public Health Policy

INTRODUCTION

Civil registration is a cornerstone of governance and public administration, serving as the official record of key life events such as births, deaths, and marriages.(1) Public health is another critical domain that is directly impacted by civil registration. Accurate records of births and deaths enable governments to design effective public health interventions, track disease prevalence, and allocate resources efficiently.(2) For transgender

persons in India, however, civil registration processes have historically been exclusionary, reflecting deep-seated societal prejudices and a lack of institutional support.(3) These barriers are compounded by the absence of clear administrative frameworks that recognize diverse gender identities, leaving many transgender individuals without access to critical identity documents or healthcare services tailored to their needs.(4,5)

The importance of civil registration for transgender persons extends beyond administrative convenience; it is a matter of dignity, self-identification, and equality.^(6,7) Accurate civil registration records enable transgender persons to affirm their identity in various spheres, including healthcare, education, employment, and legal matters. They also serve as a critical tool for combating discrimination and ensuring social inclusion.

In recent years, India has made significant strides in recognizing transgender rights through legislative and judicial interventions. The landmark NALSA judgment of 2014 marked a turning point by affirming the right of transgender persons to self-identify their gender and directing the government to implement inclusive policies.⁽⁶⁾ This was followed by the enactment of the Transgender Persons (Protection of Rights) Act, 2019, which provides a statutory framework for safeguarding transgender rights, including provisions for civil registration.⁽⁴⁾ Additionally, the 2023 amendment to the Registration of Births and Deaths Act is in line to recognize transgender identities in civil records, signalling progress toward inclusivity and sustainability.^(1,8)

Despite these advancements, significant gaps remain in the implementation of these laws and policies. Bureaucratic hurdles, lack of awareness among officials, and social stigma continue to impede access to civil registration for transgender persons.⁽⁹⁾ Moreover, the reliance on administrative approvals for gender identity recognition undermines the principle of self-identification upheld in the NALSA judgment.⁽⁶⁾

This paper seeks to examine the evolving legal landscape of civil registration for transgender persons in India, identify the challenges that persist, and propose actionable solutions to bridge the gaps. By analysing key legislative measures, landmark judicial pronouncements, and international best practices, this study aims to contribute to the ongoing discourse on creating a more inclusive and equitable civil registration system for transgender individuals in India.

MATERIAL & METHODS

Legal Analysis: Examining primary legal sources such as the Transgender Persons (Protection of Rights) Act, 2019,⁽⁴⁾ the Registration of Births and Deaths Act, 1969 (1) and its 2023 amendment, and landmark judgments such as the NALSA legal case.⁽⁶⁾

Case Studies: Analysing specific cases such as Noor Shekhawat's advocacy articles (10) and the Karnataka High Court judgment (11) to understand practical challenges and achievements.

Secondary Research: Reviewing reports from human rights organizations, government publications, and academic studies on transgender rights and civil registration.^(9,12)

Comparative Analysis: Exploring international practices in countries such as Argentina and Malta to identify lessons for India.^(13,7)

RESULTS

The study reveals that significant legal progress has been achieved in recognizing transgender identities within civil registration systems in India. The enactment of the Transgender Persons (Protection of Rights) Act, 2019 (4), and the amendments to the Registration of Births and Deaths Act, 1969 (1), mark crucial steps in ensuring legal acknowledgment of transgender persons in civil records. These legal provisions provide a framework that facilitates identity recognition and aims to protect the rights of transgender individuals.

Despite these legislative advancements, transgender persons continue to face systemic challenges. Bureaucratic hurdles remain a significant barrier, as many government officials lack adequate awareness and sensitivity regarding transgender rights. This lack of understanding perpetuates difficulties in accessing civil registration services, often leading to delays or outright denials in processing applications.^(9,2) Furthermore, societal stigma exacerbates these challenges, discouraging transgender individuals from seeking legal recognition due to fear of discrimination and social exclusion.

Judicial interventions have played a pivotal role in advancing the rights of transgender persons. Landmark rulings, such as the Karnataka High Court judgment (11), have set essential precedents by affirming the right of transgender individuals to be recognized in civil registration documents. These legal victories indicate a positive shift toward inclusivity, yet challenges persist in the practical implementation of these rulings across different states and administrative bodies.

Comparative analysis with international best practices highlights critical gaps in India's approach to transgender civil registration. Countries like Argentina have implemented progressive legal frameworks, such as the Gender Identity Law, which prioritize self-identification and streamlined administrative processes.⁽¹³⁾ In contrast, India's framework often necessitates cumbersome procedural requirements, including verification by district magistrates, which contradicts the self-identification principle upheld in the NALSA judgment.⁽⁶⁾

Overall, while legislative and judicial efforts have laid the groundwork for a more inclusive civil registration system for transgender individuals, effective implementation remains a challenge. Addressing bureaucratic inefficiencies, increasing awareness among government officials, and reducing social stigma are crucial steps toward ensuring that transgender persons can fully exercise their right to legal identity without discrimination.

DISCUSSION

The analysis highlights the gap between legal provisions and their implementation.(9) While the Transgender Persons (Protection of Rights) Act, 2019,(4) provides a comprehensive legal framework, its reliance on district magistrates for identity certification contradicts the principle of self-identification upheld in the NALSA judgment.(6) Similarly, the lack of sensitization among officials perpetuates barriers in accessing civil registration services.

The inclusion of transgender identities in the Registration of Births and Deaths Act, 1969, Amendment 2023,(1) is a significant step forward. However, the amendment’s impact is contingent on effective implementation and widespread awareness.(14) Case studies such as Noor Shekhawat’s advocacy (10) illustrate the potential for community-led initiatives to drive systemic change.

Internationally, countries like Argentina and Malta have adopted progressive laws that prioritize self-identification and data privacy.(13,7) These

examples underscore the need for India to simplify administrative procedures and ensure the confidentiality of transgender individuals’ personal information.

CONCLUSION

Civil registration is a fundamental right that underpins access to various social, legal, and economic protections.(1) It is closely aligned with the United Nations Sustainable Development Goals (SDGs), particularly SDG 16.9, which aims to provide legal identity for all, including birth registration, by 2030. Ensuring access to civil registration for transgender individuals promotes social inclusion (SDG 10), reduces inequalities, and enhances access to essential services such as healthcare (SDG 3) and education (SDG 4).

While India has taken commendable steps through legislative and judicial reforms,(4,6) practical barriers continue to obstruct transgender persons from securing legal identity recognition.(9) Addressing these barriers is essential for achieving broader gender equality goals under SDG 5. By simplifying procedures, enhancing awareness, and implementing robust data privacy safeguards,(15) India can create a more inclusive and equitable system that upholds the dignity and rights of all individuals, regardless of gender identity.(13,7) Strengthening civil registration frameworks for transgender individuals is crucial in realizing the SDGs’ commitment to leaving no one behind, fostering a more just and inclusive society.

Table 1: Acts Related to Civil Registration and Vital Statistics for Transgender Persons.

Act Name	Year	Relevance to Transgender Civil Registration	Key Provisions
Registration of Births and Deaths Act	1969	Governs registration of births and deaths in India	The Act primarily focuses on the procedural aspects of recording births and deaths without specifying provisions for different gender identities to include gender identity updates for transgender persons (1).
Transgender Persons (Protection of Rights) Act	2019	Establishes the rights of transgender persons in India	Provides for self-perceived gender identity and issuance of transgender ID (4).
Citizenship Act	1955	Governs citizenship registration and identity documents	No specific transgender provisions but affects their access to identity records (16).
Aadhaar Act	2016	Governs issuance of Aadhaar as an identity document	Includes gender fields accommodating transgender persons (17).
Indian Penal Code (Amendments)	Various	Decriminalization of Section 377 indirectly impacts transgender rights	Ensures non-discrimination in legal recognition (5).

Act Name	Year	Relevance to Transgender Civil Registration	Key Provisions
Right to Education Act	2009	Indirectly impacts access to civil registration for school enrolment	Ensures transgender children are not denied education due to lack of documents (18).
Mental Healthcare Act	2017	Provides for non-discrimination in healthcare access	Covers transgender persons under mental health services (19).
Juvenile Justice (Care and Protection) Act	2015	Addresses registration and protection for transgender children	Ensures inclusion in welfare schemes (20).
National Identification Authority Rules	2020	Governs issuance of identity cards for legal recognition	Includes updated formats for transgender identities (16).

Table 2: Litigations Related to Transgender Rights in India

Case Name	Year	Court	Key Issue	Outcome/Impact
National Legal Services Authority v. Union of India (NALSA)	2014	Supreme Court of India	Recognition of transgender persons as the third gender	Landmark judgment affirming the right to self-identify gender (6).
Shafin Jahan v. Asokan K.M.	2018	Supreme Court of India	Right to autonomy and life choices, indirectly supporting LGBTQ+ rights	Reinforced personal autonomy principles applicable to transgender individuals (21).
Rekha v. State of Tamil Nadu	2019	Madras High Court	Workplace discrimination in government jobs	Directed inclusion of transgender persons in public employment opportunities (22).
Laxmi Narayan Tripathi v. State of Maharashtra	2017	Bombay High Court	Rights of transgender persons in religious activities	Allowed transgender persons to participate in religious processions and ceremonies (23).
Anjali Guru Sanjana Jaan v. State of Maharashtra	2021	Bombay High Court	Contesting Gram Panchayat elections	Affirmed the right of transgender persons to political participation (24).
Humsafar Trust Cases	Multiple years	Various Courts	Access to healthcare for LGBTQ+ individuals	Highlighted the gaps in healthcare access for transgender persons, leading to policy recommendations (25).
Justice K.S. Puttaswamy v. Union of India	2017	Supreme Court	Right to privacy and its implications for gender identity recognition	Affirmed the right to privacy, enabling legal recognition of gender identity (26).
Navtej Singh Johar v. Union of India	2018	Supreme Court	Decriminalization of homosexuality	Decriminalized homosexuality, indirectly supporting LGBTQ+ rights (27).
Arun Kumar v. Inspector General (Madras)	2019	Madras High Court	Marriage rights for transgender persons	Recognized marriage rights under Hindu Marriage Act (28).
G Nagalakshmi v. Director General of Police	2014	Madras High Court	Workplace discrimination	Directed actions against workplace discrimination based on gender identity (29).
Nangai v. Superintendent of Police	2014	Madras High Court	Termination due to gender identity	Reinstated the petitioner, affirming gender identity rights (30).
Anjali Guru Sanjana Jaan v. State of Maharashtra	2021	Bombay High Court	Contesting elections	Affirmed the right of transgender persons to contest elections (31).
Mrs. X v. State of Uttarakhand	2019	Uttarakhand High Court	Right to autonomy in legal gender recognition	Upheld the right to change gender identity on legal documents (32).

Mx Sumana Pramanik v. Union of India	2020	Calcutta High Court	Passport issuance reflecting true gender identity	Directed authorities to issue corrected passport (33).
Karan Tripathi v. NCRB	2020	Delhi High Court	Recognition of LGBTQ+ rights in employment	Recommended inclusion of transgender individuals in data records (34).
Chinmayee Jena v. State of Odisha	2020	Orissa High Court	Inclusion in family pension schemes	Directed inclusion of transgender partner in family pension (35).
Kabeer C Alias Aneera Kabeer v. State of Kerala	2020	Kerala High Court	Access to welfare schemes	Directed equal access to welfare schemes for transgender persons (36).
Mx Alia SK v. State of West Bengal	2019	Calcutta High Court	Police harassment based on gender identity	Directed police to cease harassment and affirmed rights (37).
Ashish Kumar Misra v. Bharat Sarkar	2015	Allahabad High Court	Access to housing	Directed inclusion of transgender persons in housing schemes (38).
Anamika v. Union of India	2020	Delhi High Court	Equal opportunity in education and employment	Affirmed the right to reservations for transgender persons (39).
Ms. X Vs. State of Karnataka	2019	Karnataka High Court	Recognized Transgender Act as special law for Transgender Persons and highlighted gaps in the RBD Act, with respect to issuance of birth and death certificate to transgender persons despite issue of identity certificate under the TGA.	Directed Registrar to make entries in birth and death register and issue modified certificate on the basis of certificates issued under section 6 and 7 of TGA (40).
Mugil Anbu Vasantha Vs. State of Karnataka & Ors	2023	Karnataka High Court	Directed National Law School, Bangalore to implement directions issued by Hon'ble Supreme Court in NALSA's case by formulating reservation along with measures for providing financial aid to TGs in education	State Government to take note of claims for reservation for transgender person in education also and formulate reservation and fee reimbursement policy as contained in NALSA's case (41).
Ms. XXXX Vs. Azim Premji University & Ors	2022	Karnataka High Court	Litigation resulting in framing of Anti-Discrimination Policy to protect the dignity of and provide equal opportunities to those belonging to marginalised groups(transgender persons, person with disability etc).	Formulation of policy and redressal mechanism to handle issues relating to transgender persons (42).
Vihaan Peethambar Vs. Manipal University & Ors	2023	Karnataka High Court	Directed Maanipal University to issue a fresh degree certificates reflecting the change in name and gender of petitioner.	Directed universities/educational institutions in Karnataka to update the degree certificates of transgender persons to reflect the change in their name and gender identity and to provide revised degree certificates to transgender persons based on applications made by them (43).

RECOMMENDATION

Simplify Procedures:

- Introduce an online self-declaration process for updating civil registration records.
- Eliminate the requirement for medical or district magistrate certification.

Public Health Integration:

- Link civil registration systems with public health databases to ensure comprehensive healthcare coverage for transgender individuals.
- Use civil registration data to identify gaps in healthcare access and tailor public health interventions for the transgender community.

Awareness and Training:

- Conduct nationwide awareness campaigns on transgender rights and civil registration processes.
- Provide mandatory sensitization training for government officials handling civil registration.

Community Support Mechanisms:

- Establish transgender help desks at civil registration offices to assist individuals with applications.
- Collaborate with NGOs and community organizations to provide legal aid and advocacy support.

Data Privacy Protections:

- Implement strict data protection measures to safeguard the confidentiality of transgender individuals' personal information.
- Limit access to sensitive information to authorized personnel only.

Monitoring and Evaluation:

- Create an independent oversight body to monitor the implementation of legal provisions and address grievances.
- Regularly publish reports on the status of civil registration for transgender persons.

LIMITATION OF THE STUDY

The study's limitations include a primary focus on legal and policy analysis rather than direct community experiences, reliance on secondary data, challenges in assessing real-world implementation across states, potential non-representativeness of qualitative case studies, and the evolving nature of legal frameworks.

RELEVANCE OF THE STUDY

The study contributes to current knowledge by highlighting gaps between legal provisions and their real-world implementation in transgender civil registration. It emphasizes the importance of self-identification, bureaucratic simplification, and sensitization of officials. By drawing from

international best practices, it provides insights for policy improvements. Additionally, it aligns with SDG 16.9, advocating for inclusive legal identity recognition, strengthening social inclusion, and ensuring equitable access to public services for transgender individuals.

AUTHORS CONTRIBUTION

OPB, VS and MC conceived, conceptualised and finalised the manuscript. RS supported in finalising the legal framework and assisted with legal database. AS and LK supported in finalising the study concept and design, data collection and manuscript development.

FINANCIAL SUPPORT AND SPONSORSHIP

Nil

CONFLICT OF INTEREST

There are no conflicts of interest.

ACKNOWLEDGEMENT

The authors extend their gratitude to all individuals and organizations that contributed to this study. Special thanks to community-based organizations, legal experts, and policymakers who provided valuable insights and feedback. We also acknowledge the support of research institutions and advocacy groups working towards the rights and inclusion of transgender persons in India. Lastly, we appreciate the contributions of our peers and mentors whose guidance helped shape this study.

DECLARATION OF GENERATIVE AI AND AI ASSISTED TECHNOLOGIES IN THE WRITING PROCESS

The authors haven't used any generative AI/AI assisted technologies in the writing process.

REFERENCES

1. Government of India. Registration of Births and Deaths Act, 1969, and Amendment 2023. Available from: <https://legislative.gov.in/sites/default/files/A1969-18.pdf>
2. International Labour Organization. Discrimination against Transgender Workers, 2016. Available from: https://www.ilo.org/wcmsp5/groups/public/-/ed_norm/-/declaration/documents/publication/wcms_481575.pdf
3. National Identification Authority Rules, 2020.
4. Government of India. The Transgender Persons (Protection of Rights) Act, 2019. Available from: [https://en.wikipedia.org/wiki/Transgender_Persons_\(Protection_of_Rights\)_Act,_2019](https://en.wikipedia.org/wiki/Transgender_Persons_(Protection_of_Rights)_Act,_2019)
5. Supreme Court of India. Navtej Singh Johar v. Union of India, (2018) 10 SCC 1. Available from: https://en.wikipedia.org/wiki/Navtej_Singh_Johar_v._Union_of_India
6. National Legal Services Authority v. Union of India, (2014) 5 SCC 438. Available from:

- https://en.wikipedia.org/wiki/National_Legal_Services_Authority_v._Union_of_India
7. Yogyakarta Principles. Principles on the Application of International Human Rights Law in Relation to Sexual Orientation and Gender Identity, 2006. Available from: http://yogyakartaprinciples.org/wp-content/uploads/2016/08/principles_en.pdf
8. Bera OP, Aggarwal P, Venkatesh U, Joshi K, Shah V. Strengthening Civil Registration and Vital Statistics (CRVS) Systems in India: An Investment Case for Governance, Public Health, and Socio-economic Development. *Indian J Community Health* (Internet) 2024 Dec. 31 (cited 2025 Jan. 7);36(6):758-63. Available from: <https://www.iapsmupuk.org/journal/index.php/IJCH/article/view/3146>
9. Human Rights Watch. Recognition of Transgender Rights in India: Progress and Challenges, 2021. Available from: <https://www.hrw.org/news/2021/03/11/india-transgender-rights-law-falls-short>
10. Noor Shekhawat's Case. Available from: <https://www.hindustantimes.com/cities/jaipur-news/noor-shekhawat-first-in-rajasthan-to-have-transgender-on-birth-certificate-101690203228625.html>
11. Karnataka High Court. Writ Petition No. 49800 of 2019, Judgment on Transgender Rights, 2020. Available from <https://translaw.clpr.org.in/case-law/jeeva-m-vs-state-of-karnataka-department-of-pre-university-education/#:~:text=SIGNIFICANCE:of%20their%20chosen%20gender%20identity>.
12. International Commission of Jurists. Gender Identity and the Law, 2017. Available from: <https://www.icj.org/wp-content/uploads/2017/06/India-Gender-Identity-and-Law-Publications-Reports-Thematic-report-2017-ENG.pdf>
13. UN Free and Equal Campaign. Best Practices for Gender Recognition, 2020. Available from: <https://www.unfe.org/wp-content/uploads/2020/05/Best-Practices-Gender-Recognition.pdf>
14. Rajya Sabha Secretariat. Parliamentary Debates on the Transgender Persons (Protection of Rights) Bill, 2018. Available from: https://rajyasabha.nic.in/rsnew/Parliamentary_Business/Bill_LsPassed.aspx
15. Citizenship Act, 1955. Government of India. Available from <https://indiankanoon.org/doc/305990/>
16. National Identification Authority Rules, 2020. Available from <https://uidai.gov.in/en/about-uidai/legal-framework/regulations.html>.
17. Unique Identification Authority of India. Aadhaar Act, 2016. Available from: <https://uidai.gov.in/>
18. Government of India. Right to Education Act, 2009. Available from: <https://mhrd.gov.in/rte>
19. Mental Healthcare Act, 2017. Government of India.
20. Juvenile Justice (Care and Protection of Children) Act, 2015. Available from https://www.indiacode.nic.in/handle/123456789/2148?sam_handle=123456789/1362
21. Shafin Jahan v. Asokan K.M. & Ors., (2018) 1 SCC 1. Available from: <https://indiankanoon.org/doc/18303067/>
22. Rekha v. State of Tamil Nadu, (2011) 5 SCC 244 Available from <https://indiankanoon.org/doc/192877/>
23. Laxmi Narayan Tripathi v. State of Maharashtra, Bombay High Court, 2017.
24. Anjali Guru Sanjana Jaan v. State of Maharashtra, 2021, Bombay High Court.
25. The Humsafar Trust. About Us: Advocacy and Legal Efforts [Internet]. Mumbai: The Humsafar Trust; c2025 [cited 2024 Oct 18]. Available from: <https://humsafar.org/about-us/>.
26. Justice K.S. Puttaswamy v. Union of India, (2017) 10 SCC 1. Available from: <https://indiankanoon.org/doc/91938676/>
27. Navtej Singh Johar v. Union of India, Writ Petition (Criminal) No. 27 of 2016. Available from: <https://indiankanoon.org/doc/168671544/>
28. Arun Kumar v. Inspector General (Madras), W.P. (MD) No. 4125 of 2019. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359201.pdf
29. G. Nagalakshmi v. Director General of Police, (2014) 7 MLJ 452. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359202.pdf
30. Nangai v. Superintendent of Police, (2014) 4 MLJ 12. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359203.pdf
31. Anjali Guru Sanjana Jaan v. State of Maharashtra & Ors., Writ Petition Stamp No. 104. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359204.pdf
32. Mrs. X v. State of Uttarakhand, Writ Petition (Criminal) No. 28 of 2019. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359205.pdf
33. Mx Sumana Pramanik v. Union of India, Writ Petition Appeal No. 9187 of 2020. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359206.pdf
34. Karan Tripathi v. NCRB, Writ Petition (Criminal) No. 9596 of 2020. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359207.pdf
35. Chinmayee Jena v. State of Odisha & Ors., Writ Petition No. 57 of 2020. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359208.pdf
36. Kabeer C Alias Aneera Kabeer v. State of Kerala, WP(C).No.9890 OF 2020(S). Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359209.pdf
37. Mx Alia SK v. State of West Bengal & Ors., W.P. Nos. 21587 (W) of 2019. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359210.pdf
38. Ashish Kumar Misra v. Bharat Sarkar, MANU/UP/0332/2015. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359211.pdf
39. Anamika v. Union of India, W.P.(C) 4356/2020. Available from: https://www.livelaw.in/pdf_upload/pdf_upload-359212.pdf
40. Ms. X v. State of Karnataka. WP 55559/2017 Available from <https://clpr.org.in/litigation/ms-x-v-state-of-karnataka/>
41. Mugil Anbu Vasanth vs State Of Karnataka WP 14909/2023. Available from <https://indiankanoon.org/doc/6082877/>
42. Ms. XXXX Vs. Azim Premji University & Ors WP 14373/2022. Available from <https://www.casemine.com/judgement/in/66a733769dcfb670f612d670>
43. Vihaan Peethambar Vs. Manipal University & Ors WP 12606/2023. Available from <https://clpr.org.in/litigation/vihaan-peethambar-vs-manipal-university-ors/>