

Beyond the Certificate: Social Inclusion and the Inadequacy of Legal Recognition Under the Transgender Persons (Protection of Rights) Amendment Bill, 2026

Authors Details

Shriya Awasthi^{1*}

Himachal Pradesh National Law University
BA.LLB 2nd Semester

ABSTRACT: The current assignment seeks to critically examine the Transgender Persons (Protection of Rights) Amendment Bill, 2026 and argues that legal recognition is important to ensure the social inclusion of transgender persons in India but is not the only requirement. Whereas NALSA case judgement delivered by the Indian Supreme Court in 2014 has recognized self-identity as a fundamental right, the amendment of 2026 has taken steps backward and replaced this foundational aspect of constitutional protection by making medical board verification mandatory. Moreover, the new Amendment has arbitrarily limited the meaning of transgender by introducing rigid criteria of identification. Citing constitutional provisions, judicial precedents, international instruments of human rights such as the Yogyakarta Principles, and scholarly literature on structural exclusion, the present assignment seeks to argue that the Amendment not only fails the community of transgender people, it also contributes further to the marginalization of this oppressed group. Social inclusion requires the adoption of rights-based approach towards administration rather than the latter. This includes non-discrimination laws, affirmative action measures in education and employment, gender transition services, and dismantling the caste-gender hierarchy.

Keywords: *2026 amendment, social inclusion, transgender, dignity, NALSA, Yogyakarta Principles.*

INTRODUCTION

One of the contested decisions was taken by the Indian parliament on 30th March 2026 when the president of India gave assent to the transgender persons protection of rights amendment bill 2026. It was introduced in the Lok Sabha on 13th March 2026 by union the Minister Virendra Kumar and the bill got cleared from both the houses in 12 days without any meaningful consultation with the stakeholders it claims to protect and despite multiple objections from activist's legal experts constitutional scholars and several members of statutory National Council for Transgender Persons the bill was callously passed overlooking the concerns. Under the disguise of administrative decisions government stripped the transgender people from basic human rights as officials argued that the wide ambit of the transgender persons protection of rights act 2019 allowed unintended people to take leverage of welfare benefits that were framed for people who genuinely needed it and among many policies, under the SMILE scheme, the government reported 21 operational Garima Greh shelter homes across 17 states and according to statistics of 2025, only about 429 persons were residing in Garima Greh shelters supported by the government which shows a different reality hence framing this amendment as a corrective measure giving ostensible rationale for tightening the legal definition to ensure that the affirmative action reached to its intended beneficiaries and according to the government this was the pragmatic approach towards good governance.

This article tries to argue that the framing of this amendment bill is outrightly misguided and the true intentions of the said amendment bill must be debunked to protect the marginalised community and their rights. The hard-won dignity acquired through multiple judicial developments and activist movements is now being attacked by this insensitive amendment bill that gatekeeps access to a certificate that is far more than a procedural formality but rather it is the document through which transgender individuals lay claim to their social existence, their dignity and their place in public life.

The analysis proceeds in 5 parts first a legal background preceding this amendment second Objective evaluation of the amendments key provisions 3rd an analysis of gap between legal recognition and material inclusion and Fourth engagement with amendments constitutional infirmities and 5th a conclusion advocating a rights based structure that will ensure genuine inclusion.

Evolution of Transgender Rights in India: Mapping the Legal Architecture of Dignity

Any discussion about the 2026 Amendment will have to take into account the judgment passed by the Supreme Court of India in the case of *National Legal Services Authority v. Union of India* (2014), which is the pinnacle point reached regarding transgender rights in India. It was observed by the court, in its two-judge bench headed by Justice K.S. Radhakrishnan and Justice A.K. Sikri, that gender identity is an inherent part of human dignity and is covered under Article 21 of the Indian constitution. The court rightly held that no person should be compelled to go sex reassignment surgery sterilization or hormonal therapy as a prerequisite for legal recognition of their gender identity. The NALSA judgement accentuated the psychological self-identification over anatomical criteria conforming to the Yogyakarta Principles which is a set of international legal principles on sexual orientation and gender identity adopted in 2006 that is also consistent with the fundamental rights and enshrined in the Indian constitution. The Supreme Court bench comprising Justice K.S. Radhakrishnan and justice A.K. Sikri recognised transgender persons as a “third gender” directing governments to develop welfare programs addressing their unique needs and classified them as socially and educationally backward classes which are entitled to reservations in education and public employment.

The NALSA ruling established that the right to self-identification is grounded in articles 14 equality before law, 15 and 16 non-discrimination, 19 (1) (a) freedom of expression and 21 right to life with dignity. The constitutional provisions were no less significant rather, they provided a strong doctrinal background that transformed self-identification from being a statutory provision to becoming a fundamental right. This is further reflected in other judgments, such as the landmark judgment by a nine-judge bench in *K.S. Puttaswamy v. Union of India* (2017), which recognised privacy as a fundamental right and further stated that gender identity is an integral part of individual autonomy. The Transgender Persons (Protection of Rights) Act, 2019 endeavoured to codify the constitutional provision into statute. The Act defined the term "transgender person" very broadly to mean "a person whose gender does not match with the gender assigned at birth" to include trans men, trans women, non-binary persons, intersex people, as well as socio-cultural identities of hijra, kinner, aravani, and jogta. Under Section 4(1), the 2019 Act specifically recognized the "right to self-perceived gender identity." Further, the Act prohibited discrimination in

respect of education, employment, healthcare services, and property rights, and provided certain welfare measures for transgender persons.

Even before the 2026 amendment many scholars and activists sensitizing about the shortcomings of the 2019 framework as the India development review highlighted the anti-discrimination provisions under the act did not specify penalties for non-compliance rendering the provision largely unenforceable. The Act established the National Council for transgender persons and a complaint officer devoid of adjudicatory power leaving transgender persons without effective grievance redressal mechanisms. Although these laws formally decriminalised transgender identities yet true social decriminalisation remains far from achieved. Moreover, instead of addressing existing structural inequalities, the 2026 amendment further exacerbates the harsh lived realities of transgender individuals.

Critical Analysis of 2026 Amendment

Of all the changes brought about by the 2026 Amendment, the most significant one in terms of structure is that of replacing the identity-based, inclusive definition of “transgender person” in the Act with a restrictive list of categories. While the definition of transgender persons under the 2019 Act was that of “those whose gender does not match with the gender assigned at birth” a definition quite close to the NALSA definition, the Amendment takes away this definition completely and replaces it with the following categories of persons: (i) those having certain socio-cultural identities (hijra, kinner, aravani, jogta, and the rather derogatory term “eunuch”); (ii) those having certain five intersex variations; and (iii) persons who have been "forced" or “compelled” to become transgender through mutilation, castration, emasculation, surgery, hormonal therapy, or chemical procedures.

Such a definition has serious exclusionary implications. As Centre for Law and Policy Research (CLPR) notes, trans men (persons assigned female at birth and identifying as male) will be excluded from the ambit of this definition, since they will not fall within any of the three categories above. Non-binary and gender-fluid persons will also be excluded. Trans women, who do not fall within the specific categories of hijras or kinnars, including those who have taken hormone therapy or undergone gender-affirmation surgeries and whose identities are expressed beyond the traditional socio-cultural paradigms, too,

become invisible under the new definition. Human Rights Watch has pointed out that the Bill "removes legal recognition for those who self-identify as trans men, trans women, or gender non-binary people. The definition itself, however, is internally inconsistent. Thirdly, the persons who are "forced" to be identified as transgender are, indeed, a contradictory category, as the lawyer and trans activist, Kanmani Ray, has argued. "A person forced to assume an identity," she writes, "does not identify as transgender. This makes the inclusion of such a category under the definition of "transgender person" all the more problematic, as it reifies just the kind of stigma-laden tropes that the condition of being transgender is imposed or abnormal, that the NALSA Court sought to refute.

Another contentious provision of this bill is its explicit statement that the definition will not include or will never have included persons with different sexual orientation and self-perceived sexual identities. The phrase self-perceived sexual or identities appears to be a direct repudiation of the NALSA right to self-identification. There is an explicit constitutional incongruity that this statutory text in the amendment reflects as it contradicts with the ruling of constitution bench of the Supreme Court.

The bill unmindfully groups intersex and gender communities under a single umbrella without recognising their distinct identity and needs. As stated by Daniella Mendonca, co-founder of Intersex Human Rights India, "intersex and transgender lived experiences are different and they should not be treated as interchangeable". Sex characteristics and gender identity are distinct phenomenon and treating them as same is both medically and politically insensitive.

Medical Boards and Pathologisation of Identity

Another debatable structural change that this Amendment introduced is the mandatory interposition of a Medical Board between the transgender applicant and the District Magistrate. Previously under the 2019 Act a transgender person could obtain a certificate of identity on the basis of self- declaration through an affidavit submitted to the District Magistrate. According to the amendment District Magistrate will now examine the recommendation of a "designated medical board" which will be headed by a Chief Medical Officer or Deputy Chief Medical Officer before issuing the certificate with authority to take assistance from "other medical experts", a medical term left undefined creating a legal ambiguity. By adding more bureaucratic hurdles, the law regressed leading to legal

exclusion of many transgender individuals who fight for their identity not just legally but also socially. The implementation of medical gatekeeping goes beyond mere process-related difficulties. It represents a theoretical retreat of the highest order. The World Health Assembly, in May 2019, made a decision to delist gender identity disorder from the chapter on mental and behavioural disorders in the ICD-11, transferring "gender incongruence" to a chapter on sexual health, precisely because it acknowledged that "transgender and gender diverse people's identities do not represent mental illness conditions," and because "classifying them as such causes enormous stigma . When a government mandates the certification of someone's gender identity by a medical board before it can be legally recognized, it essentially re-pathologizes what decades of global medicine have worked to de-pathologize.

As critically observed by the Outlook India that the Amendment “reinstates a biologically deterministic understanding of gender, undermining the very premise of NALSA which gave more importance to psychological self-identification over anatomical criteria. The Government frame this amendment as a safeguard against misuse but in reality it’s a structural transfer of power where government decides on the identity of an individual stripping them of their basic human right without any sound justification. The other requirement of the Amendment is that the medical institutions in which the gender-affirming surgeries take place have to provide details of such surgeries to the District Magistrate. Such an infringement on doctor-patient confidentiality is indeed a significant, perhaps even unconstitutional, one. According to CLPR, the mandatory reporting requirement in the Amendment is a “gross breach of the right to privacy” upheld in *Puttaswamy v. Union of India*.” The chilling effect of this mandate on the availability of gender-affirming care from medical practitioners cannot be underestimated. As Amnesty International India has pointed out, the criminal provisions relating to coercing or alluring persons into adopting a transgender identity used against medical professionals providing gender-affirming care.

Criminal Provisions

The Amendment introduced enhanced punishments for crimes against transgender, crimes such as kidnapping and causing grievous hurt through forced mutilation, castration or hormonal procedures to compel a person to assume a transgender identity will now attract

imprisonment of ten years to life and minimum of two lakh rupees for adult victim and mandatory life imprisonment with a fine of five lakh rupees in case of a child as victim.

Well on surface the penalisation of forced physical mutilation appears to be protective by several critics has identified it a dangerous ambiguity. While the criminalization of forced physical mutilation might seem like an obvious protection measure, scholars have pointed out an inherent danger. The vague notion of compelling or alluring a person into “outwardly appearing as a transgender” person, when combined with the limited definition of transgender identity offered by the Amendment, presents the danger of criminalizing the very networks, family structures, and social organizations that make transgender communities possible. The traditional hijra jamaat, or the guru-chela kinship network which provides a sense of community, livelihood, and identity for the hijra community in the absence of state support, is made vulnerable to criminalization through this definition. As the People's Union for Civil Liberties has cautioned, such laws recall the Criminal Tribes Act, which was used in colonial times to criminalize transgender people based on their gender nonconformity.

In the landmark judgment of the Telangana High Court in *Vyjayanti Vasanta Mogli v. State of Telangana*, it was held that similar laws of criminalization have a “chilling effect on the freedom of expression and right to privacy” and reinforce “derogatory stereotypes about the transgender community. The 2026 Amendment is likely to repeat this problem at a national level.

Social Recognition beyond the Certificate

For a moment if we set aside the infirmities of 2026 Amendment and create a utopic imagination of existence of a inclusive legal framework that is fully consistent with NALSA which acknowledges self-identified gender, issues certificate with minimal bureaucratic bottlenecks and provide formal guarantees against discrimination yet the issue of social inclusion remains unresolved. This sections argues that while legal inclusion is a indispensable part but without structural social inclusion, the efforts to eliminate discriminations against transgender persons remains inefficient. The gap is evident in the stark difference which is highlighted by the statistics as India’s 2011 census recorded approximately 487,803 persons in the “other” gender category yet as of time of the

Amendment's passage only around 32,500 transgender persons has obtained identity cards under the existing framework. The gap reflects the chilling effect of social stigma, bureaucratic hostility, family rejection and fear of violence that make the engagement with state institutions an act of considerable courage not just a mere legal procedure for most of the transgender persons in India.

Sociology Compass published a study in 2025 examining the survival economies of transgender individuals in the Delhi-NCR region with crucial findings of how true social inclusion cannot be achieved without addressing economic exclusion and advocated for policies that go beyond legal identity recognition to ensure dignified employment, inclusive education and healthcare access. One more critical finding of the study is the participation of transgender persons in sex work and begging but this is not a lifestyle choices rather imposed constraints arising from cascading exclusions from family, school, formal employment which gets compounded by absence of enforceable anti-discrimination protections.

The education sector that should be alleviating the discrimination has inadvertently become the platform for structured exclusion of transgender persons. While the NALSA judgment and the 2019 Act forbid discrimination in educational institutions, little has been done by the education boards to include issues regarding transgender people or gender diversity within the curriculum. The issuing of notice by the Supreme Court to the Central Government and NCERT due to public interest litigation regarding comprehensive sexuality education inclusive of transgender children shows the stark difference between law and reality. It is within schools where children recognize themselves as transgender that they are either rendered invisible or subject to discrimination and hostility. As families reject transgender people universally, schools become the first institutions where exclusion occurs.

The cultural sphere is not less important when it comes to exclusion and sometimes tentative advancement. Popular media in India has, traditionally perpetuated the stigma that the law tries to dismantle, with transgender characters in mainstream Hindi films being stereotypically cast in villainous roles or as sources of mockery or humour a characterization that has, according to researchers, a greater effect on public perception than any statutory language can ever have. PSI Mangal Mukhi, a 2026 OTT web series

featuring Ella D'Verma, a transgender woman herself played the role of a transgender sub-inspector of Uttar Pradesh, who faces resistance in the form of ridicule and marginalization within the police force, represents a rare example of a mainstream Hindi film with a trans protagonist that does not rely on stereotyping for its plot. There is a dialogue in the series wherein a fellow inspector tells her “Tum to aurat aur admi dono ho” not as a compliment but an insult indirectly calling her a abomination. It depicts in dramatic terms the conflict between formal integration, which involves having a state position, and real integration, which is hindered by constant ridicule, marginalization.

In the domain of employment, where Identity documents are indispensable prerequisite for accessing all civil rights and economic opportunities including the right to vote, educational enrolment, inheritance, banking, healthcare, and formal employment. The medical gatekeeping introduced by the 2026 Amendment makes it more difficult for transgender persons to access employment opportunities who already navigate bureaucratic systems with inadequate support. The ORF has documented that transgender persons consistently face “significant barriers in accessing healthcare, education, housing, and employment,” and that “daily lives are marred by the pervasive influence of stigma, discrimination, and violence.

The healthcare sector highlights possibly the deepest form of structural contradiction. Hormone replacement and sex reassignment surgery are essential parts of the process of gender affirmation for transgender people, without which the risk of developing depression, anxiety, and suicidal thoughts heightens. The requirement imposed by the 2026 Amendment for hospitals to inform the District Magistrates of any sex reassignment surgeries performed is tantamount to a surveillance state in the decision-making process about one of the most personal choices related to an individual's body. According to Thesquirrel.in, this measure implies a violation of confidentiality between the doctor and patient, thus discouraging medical practitioners from performing procedures aimed at helping transgender individuals affirm themselves, thus entrapping disadvantaged people into a constitutional bureaucratic straitjacket.

India's obligations under international human rights law also demand attention. The Supreme Court in NALSA affirmed Yogyakarta providing that all people are entitled to legal recognition and that legal recognition cannot be based on or require that persons

disclose their sex, gender, sexual orientation, gender identity, gender expression, or sex characteristics. The Yogyakarta Principles Plus 10 (2017) further mandated that legal gender recognition must be a quick, accessible and transparent administrative process based on a person's self-determination and should not be marred by excessive bureaucratic hurdles but the 2026 Amendment doing exactly that defeating its purpose. As Aakar Patel of Amnesty International India has noted, instead of simplifying processes, this amendment adds more bureaucratic and medical layers, approvals, and verifications which pave the way for prejudice.

Constitutional Infirmities

The 2026 Amendment, according to assessment of a wide range of constitutional scholars and human rights organisations is likely unconstitutional on multiple grounds.

First, it violates Article 21 (right to life with dignity), the NALSA Court held that gender identity is integral to personal dignity and is constitutionally protected. The Amendment's substitution of medical board verification for self-identification directly subordinates this constitutionally recognised element of dignity to administrative convenience.

Second, it violates Article 14 (right to equality), the Amendment draws an arbitrary and irrational distinction between “recognised” transgender identities (those falling within its narrow definitional categories) and those who are excluded including trans men, non-binary persons and trans women outside traditional socio-cultural communities. The NALSA Court's recognition of transgender persons as entitled to all fundamental rights under Part III of the constitution cannot be selectively revoked without any intelligible differentia to justify such distinction.

Third, it is an infringement of Article 19 (1)(a) (right to freedom of expression) as has been clearly established by the case law of CLPR and also the decision of the Telangana High Court in the case of Vyjayanthi Vasanta Mogli, whereby criminalisation of gender identity through criminal provisions has a constitutionally impermissible “chilling effect” on freedom of expression. The vagueness of penalisation of “conduct which compels or allures another person outwardly to appear as a transgender person” falls squarely within this category.

Fourth, it infringes upon the fundamental right to privacy under Puttaswamy, in terms of the provision for mandatory notification of gender-reassignment surgery to the concerned government authority. This is an act of state surveillance over the most intimate decisions concerning one's own body which the nine-judge bench in the case of Puttaswamy has made clear was non-intrusive territory of privacy.

Framework towards Genuine Inclusion

The criticism of 2026 Amendment is futile without accompanying it with real affirmative vision to ensure genuine inclusion. Genuine inclusion begins with creating constitutional imperative by allowing self-identification as the basis of legal. Legal recognition processes must be streamlined, de-medicalised, and brought into conformity with the Yogyakarta Principles also ensuring that they be quick, accessible and transparent. The NALSA mandate for reservations in education and public employment must be materialised and not just keep it in books. Anti-discrimination provisions must be made enforceable. The absence of penal consequences for violation of Section 3 of the 2019 Act which prohibits discrimination in education, employment and housing brings no substantial change in the ordeal of transgender persons. As IDR has argued, the law must not only prohibit discrimination but must devise affirmative measures for their inclusion and one such progressive measure state can take is to designate special courts or tribunals with the power to adjudicate complaints, award damages, and enforce compliance.

Rather than making health-care a domain of surveillance, health care needs to be re-imagined as a site of dignity. In order for the taboo surrounding gender transition procedures such as hormone treatments, therapy, and surgery to be dispelled, health care will need to incorporate gender transition procedures into routine offerings, not an exceptional case. The decision by the World Health Organisation to move gender identity disorder out of the category of mental disorders reflects a global consensus and sensitization demanding national conformity.

Similarly educational inclusion requires a mindful overhaul incorporating transgender-inclusive curricula, sensitisation training for teachers and administrators, safe reporting mechanisms for harassment, and explicit scholarship programmes that address the economic barriers to continued enrolment. Schools are the primary site where a child

navigates her/his identity and absence of transgender inclusive curricula pave way for more confusion leading to myriad consequences including identity dysmorphia, internalized shame, loss of friendships, dropout risk, misgendering and deadnaming, delayed self-identification.

Lastly, there must be genuine democratic participation as well. It is noteworthy that the 2026 Amendment was adopted without consultation from the NCTP, and in only twelve days; further, the adoption of the amendment led to the resignations of two members of the NCTP. This indicates an institutional failure which is no less serious than the theological flaw. Though there are some commendable actions taken by political parties including All India Trinamool Congress nominating Menaka Guruswamy as India first openly queer Member of Parliament ensuring their participation and Indian National Congress appointing Apsara Reddy as the national general secretary of its women wing (All India Mahila Congress) making her first transgender to be an office-bearer of a major political party.

CONCLUSION

To begin with, the Transgender Persons (Protection of Rights) Amendment Bill, 2026, being a legislative measure, falls short on two counts. Firstly, it represents a total rollback of developments made within the last decade of constitutional history in the form of rejection of the right to self-identification, narrow interpretation of the term 'transgender', and criminal provisions that jeopardize support networks available to transgender persons. Secondly, it establishes an inadequate framework for addressing the structural exclusion of transgender persons with regard to access to education, healthcare, and other basic necessities of life.

Sure that 2026 amendment should be mindfully criticised and exposed however it must not be overlooked that only legal measures can ensure true inclusion of transgender persons in Indian society. The NALSA case stands as a landmark judgment of the Indian Supreme Court, yet at the same time, it did nothing about implementing reservation policies, providing adequate funding for social welfare programs, and prohibiting discriminatory practices against transgender individuals. Thus, in effect, the fact remained that the Indian society had an estimated transgender population of 487,803 people who still seek a

certificate when every system stands against them and denies them the dignity that is the basic human right. As activist Laxmi Narayan Tripathi has said of this moment “I want this black day for the transgender movement in India to end quickly” . The path forward lies not in administrative gatekeeping but in genuine constitutional and social inclusion honouring the promise that every person, regardless of gender identity, is entitled to live with dignity, equality and freedom.

REFERENCES

1. Amnesty Int'l, India: Presidential Approval of Regressive Transgender Bill a Major Step Backward for Human Rights, Amnesty Int'l (Mar. 31, 2026), <https://www.amnesty.org/en/latest/news/2026/03/india-presidential-approval-of-regressive-transgender-bill-a-major-step-backward-for-human-rights/>.
2. National Legal Services Authority v. Union of India, (2014) 5 S.C.C. 438 (India).
3. Yogyakarta Principles on the Application of International Human Rights Law in Relation to Sexual Orientation and Gender Identity (2006).
4. Legal Sch., NALSA vs Union of India: Landmark Judgment for Transgender Rights in India, Legal Sch., <https://thelegalschool.in/blog/nalsa-vs-union-of-india> (last visited June 5, 2026).
5. IDR, Do India's Laws Protect Queer People from Discrimination?, IDR (Aug. 29, 2025), <https://idronline.org/article/rights/do-indias-laws-protect-queer-people-from-discrimination/>.
6. Ctr. for L. & Pol'y Rsch., The 2026 Transgender Amendment Bill and Its Roll-Back of Constitutional Rights, CLPR (Mar. 26, 2026), <https://clpr.org.in/blog/the-2026-transgender-amendment-bill-and-its-roll-back-of-constitutional-rights/>.
7. Thought Co., What the 2026 Transgender Bill Is Really Saying, Thought Co. (Mar. 27, 2026), <https://www.thethoughtco.in/blogs/news/what-the-2026-transgender-bill-is-really-saying-and-who-its-saying-it-to>.
8. Carr-Ryan Ctr., Harvard Kennedy Sch., Protection to Prosecution: The Criminalization of Transgender Existence, Harv. Kennedy Sch. (Apr. 2, 2026),

<https://www.hks.harvard.edu/centers/carr-ryan/our-work/carr-ryan-commentary/protection-prosecution-criminalization-transgender>.

9. Rameez Raja & Mohd Azam Khan, Beyond Identity: How Survival Economies Shape the Social Inclusion of Transgender Individuals in Urban India, Soc. Compass (2025).
10. One Future, The Challenges Faced by Transpersons in India, Medium, <https://medium.com/one-future/the-challenges-faced-by-transpersons-in-india-fa46575ca14d> (last visited June 5, 2026).
11. PSI Mangal Mukhi (Hungama OTT Apr. 9, 2026); Trans Woman Actor Ella D'Verma Leads Hungama OTT's Mangal Mukhi as a Trans Cop, CityAir News (Apr. 7, 2026) (quoting Ella D'Verma). See Sagar Suresh Gawande & Sanjay C. Bhagat, The Portrayal of Transgender in Bollywood Films, Int'l J. Sci. Dev. & Rsch. (2024).
12. Observer Rsch. Found., Leaving No One Behind: Transgender Inclusion in India's Sustainable Development, ORF (Nov. 28, 2023), <https://www.orfonline.org/expert-speak/leaving-no-one-behind>.
13. Squirrels, 2026 Transgender Amendment Bill: How India Dismantles Autonomy, Squirrels (Mar. 26, 2026), <https://thesquirrels.in/policy/india-2026-transgender-amendment-bill-nalsa-11311473>.
14. Yogyakarta Principles Plus 10, princ. 31 (2017).
15. Yogyakarta Principles, *supra* note 3.
16. Carr-Ryan Ctr., Harvard Kennedy Sch., *supra* note 8 (quoting Laxmi Narayan Tripathi).