THE IMPACT OF ECONOMIC EXCLUSION ON THE CONSTITUTIONALLY GUARANTEED ENTITLEMENTS OF ECONOMIC JUSTICE, EQUALITY OF OPPORTUNITY AND RIGHT TO LIVE WITH HUMAN DIGNITY OF THE TRANSGENDERS

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ABSTRACT

Objective: The objective of the paper is to examine and explain how the constitutionally guaranteed entitlements notably the various facets of right to equality, right to life and preambular assurance of justice: social, economic and political will remain unachievable and meaningless for the transgenders till their economic exclusion and marginalisation continues. The present paper shall examine the important aspects of legal provisions and economic policy which can ensure that the constitutional mandates enshrined under Articles 14, 15, 16 and 21 become a reality for transgender through their economic empowerment.

Theoretical Framework: The Constitution of India recognises and rests firmly on the fundamental principles of liberty, equality, fraternity and justice. Transgender people have always been the part of every society, nation and culture since ages but unfortunately their very existence has been negated at every level of society. This marginalised section and highly disadvantaged group has consistently and continuously been subjected to social stigma, discrimination and exclusion from all kinds of socio-economic and political undertakings. The insensitivity and the apathy of the public at large are still the biggest challenges in mainstreaming the transgenders and eliminating all forms of socio-economic exclusion against them. The extreme discrimination and exclusionary practices against the transgender people at every level in the workplace, from job rejection to privacy violation and even sexual harassment, disproportionately affects their physical and mental wellbeing. The socio-economic marginalisation and denial of any gainful employment opportunity puts them in depression, pessimism and forces them to engage in unlawful activities and become drug suppliers, sex workers and even low-income entertainers.

Method: The present paper focuses on the constitutionally guaranteed entitlements namely “economic justice” and “equality of opportunity” of the transgender people while taking up the issue of their economic exclusion and marginalisation and intends to explore how the economic exclusion has adverse and severe implications on transgender rights.

Results and Discussion: The cost of economic exclusion of transgender people in India cannot be undermined. Such discrimination and unaccepting environments are capable of psychologically depressing transgender people and adversely affecting their incentive to get training and education. This turns into a vicious circle that translates into low investment in human capital and suboptimal opportunities for them resulting in lower productivity of overall economy.

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Conclusion: With very limited employment opportunities, transgender’s education, health and living standard are abysmally low and therefore, in order to achieve the constitutional mandate enshrined under Articles 14, 15, 16 and 21 of the Constitution of India, the objectives of the government should be to allow reasonable participation of most of the transgender population in the national economy.

Keywords: right to equality, equality of opportunity, economic justice, socio-economic inclusion.

O IMPACTO DA EXCLUSÃO ECONÔMICA NOS DIREITOS CONSTITUCIONALMENTE GARANTIDOS DE JUSTIÇA ECONÔMICA, IGUALDADE DE OPORTUNIDADES E DIREITO DE VIVER COM A DIGNIDADE HUMANA DOS TRANSGÊNEROS

RESUMO

Objetivo: O objetivo do documento é examinar e explicar como os direitos constitucionalmente garantidos, notadamente as várias facetas do direito à igualdade, direito à vida e garantia preambular da justiça: vontade social, econômica e política permanecem inatingíveis e sem sentido para os transgêneros até que sua exclusão econômica e marginalização continuem. O presente documento examina os aspectos importantes das disposições legais e da política econômica que podem garantir que os mandatos constitucionais consagrados nos artigos 14, 15, 16 e 21 se tornem uma realidade para os transgêneros através de sua capacitação econômica.

Estrutura teórica: A Constituição da Índia reconhece e se apoia firmemente nos princípios fundamentais da liberdade, igualdade, fraternidade e justiça. As pessoas transgêneras sempre fizeram parte de todas as sociedades, nações e culturas desde os tempos, mas infelizmente sua própria existência foi negada em todos os níveis da sociedade. Este setor marginalizado e este grupo altamente desfavorecido tem sido constante e continuamente sujeito ao estigma social, à discriminação e à exclusão de todos os tipos de empreendimentos socioeconômicos e políticos. A insensibilidade e a apatia do público em geral continuam a ser os maiores desafios na integração dos transgêneros e na eliminação de todas as formas de exclusão socioeconômica contra eles. A discriminação extrema e as práticas de exclusão contra as pessoas transgêneras em todos os níveis do local de trabalho, desde a rejeição do emprego à violação da privacidade e até mesmo ao assédio sexual, afetam desproporcionalmente o seu bem-estar físico e mental. A marginalização socioeconômica e a negação de qualquer oportunidade de emprego remunerado coloca-os em depressão, pessimismo e força-os a participar em atividades ilegais e a tornarem-se fornecedores de droga, profissionais do sexo e até artistas de baixa renda.

Método: O presente documento concentra-se nos direitos constitucionalmente garantidos, a saber, “justiça econômica” e “igualdade de oportunidades” dos transexuais, ao mesmo tempo que aborda a questão de sua exclusão econômica e marginalização e pretende explorar como a exclusão econômica tem implicações adversas e graves sobre os direitos dos transexuais.

Resultados e Discussão: O custo da exclusão econômica de pessoas trans na Índia não pode ser minado. Essa discriminação e ambientes inaceitáveis são capazes de deprimir psicologicamente as pessoas transgêneras e afetar negativamente o seu incentivo para obter formação e educação. Isto transforma-se num círculo vicioso que se traduz em baixo investimento em capital humano e em oportunidades aquém do ideal para o mesmo, resultando numa menor produtividade da economia global.
1 INTRODUCTION

The term “discrimination” can be defined as failure to treat all persons equally when no reasonable distinction can be made between those favoured and those not favoured. Gender, which is a socially or culturally constructed term has always highlighted strong stereotypes, societal norms and expectations attached to it and therefore social institutions have been perpetuating discrimination on the basis of gender since ages. In fact, gender discrimination is one of the most pervading forms of institutionalised deprivation. Therefore, the quest for gender justice and gender equality is not the recent discovery of the world. It is only recently that transgender people started to assert their rights and the concept of transgender rights emerged. From time immemorial transgender people have been victims of violence and various forms of exploitations. The social sanctions, traditions and bias of the society have always placed them at various disadvantages such as social, economic, physical and most importantly psychological disadvantages.

In the case of India, with the enactment of the Constitution of India, the concept of gender equality and gender justice became important. The Constitution of India recognises and rests firmly on the fundamental principles of liberty, equality, fraternity and justice. The preamble of the Constitution of India clearly lays down that the supreme law of the land, seeks to secure to all its citizen justice- social, economic and political; liberties of thought, expression, belief, faith and worship; equality of status and opportunity and to promote fraternity assuring the dignity of the individual. Ironically, it took almost 62 years when finally, section 377 of the Indian Penal Code which branded transgender persons as innately criminal, was declared to be unconstitutional by the Supreme Court. The then Chief Justice of India, Mr. Dipak Mishra, while pronouncing

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the verdict and taking the historic decision of striking down Sec 377, accepted sexual orientation as an innate and natural aspect of an individual's life. In *Navtej Singh Johar* case the then CJI quoted German philosopher Johann Wolfgang von Goethe and said “I am what I am, so take me as I am”. In fact, it was the first move when the Supreme Court recognised individuality as the essence of life and a natural trait. Transgender people have always been the part of every society, nation and culture since ages but unfortunately their very existence has been negated at every level of society. The marginalised and highly disadvantaged group of transgenders have continuously been subjected to social stigma, discrimination and exclusion from all kinds of socio-economic and political undertakings. The Supreme Court’s verdict has undoubtedly provided them legal recognition as the ‘third gender’ but the insensitivity and the apathy of the public at large remain the major challenges in eliminating various forms of socio-economic exclusion against the transgender community.

2 THEORETICAL FRAMEWORK

It is said that social and economic rights are interlinked to civil and political rights as there is a causal connection between them (See. Brown, 2016). Social and economic rights cannot be secured in the absence of civil and political rights. In the modern, inclusive and sustainable world it is expected that all people, irrespective of sex, gender, ethnicity, race, religion, disability should be able to share the economic prosperity. In the case of transgender persons, social and economic discriminations have caused great misery in their lives and as a consequence till date they live a vulnerable life. The Yogyakarta Principles on the application of international human rights law in relation to sexual orientation and gender identity says that

“All human beings are born free and equal in dignity and rights. All human rights are universal, interdependent, indivisible and interrelated. Sexual orientation and gender identity are integral to every person’s dignity and humanity and must not be the basis for discrimination or abuse.

Human rights violations targeted toward persons because of their actual or perceived sexual orientation or gender identity constitute a global and entrenched pattern of serious concern. They include extra-judicial killings, torture and ill-treatment, sexual assault and rape, invasions of privacy, arbitrary detention, denial of employment and education opportunities, and serious discrimination in relation to the enjoyment of other human rights. These violations are often
compounded by experiences of other forms of violence, hatred, discrimination and exclusion, such as those based on race, age, religion, disability, or economic, social or other status."

The Principle 12 of the Yogyakarta Principles affirm that

"Everyone has the right to decent and productive work, to just and favourable conditions of work and to protection against unemployment, without discrimination on the basis of sexual orientation or gender identity"

The principles require all the states to take all forms of necessary actions, legislative and administrative measures to eradicate and prohibit discrimination on the basis of sexual and gender identity in all public and private employment in relation to vocational training, recruitment, promotion, dismissal, conditions of employment and remuneration. Furthermore, it also calls for elimination of any discrimination on the basis of sexual orientation or gender identity and in all areas of public service, government service and employment in public functions, including police, military and provide awareness-raising programmes to counter discriminatory attitudes.

The present study analyses the impact of economic exclusion on the transgender rights. Many empirical (See Badgett, Nezhad, Waaldijk, & Rodgers, 2014) and theoretical studies have confirmed that there is positive and linear relationship between economic inclusion of transgender person, economic growth and stronger economy. It is a matter of equal treatment, education and efficiency which can decide individual’s capacity and ability to work. The insight is important to understand and have an altogether new perspective to recognise the existing relationship between transgender people and economic development of a country. In this regard, any step taken by the country in the form of anti-discrimination laws covering transgender people and ensuring their economic rights will definitely have positive economic impact.

3 METHODOLOGY

The present research focuses on the secondary data available from Census of India 2011, and the study conducted by Kerala Development Society and submitted to the NHRC in the year 2017. The Census of India, 2011, for the first-time recognise transgender people in the category of other gender. It uses both qualitative and quantitative analysis and descriptive methods to understand how economic policy and
legal provisions which can ensure economic empowerment of transgender people and encourage their economic contributions in the country.

4 DISCUSSION

In the recent landmark decision, the supreme Court after hearing the petition filed by the National Legal Services Authority, on transgender rights said

“Recognition of one’s gender identity lies at the heart of the fundamental right to dignity. Gender, as already indicated, constitutes the core of one’s sense of being as well as an integral part of a person’s identity. Legal recognition of gender identity is, therefore, part of the right to dignity and freedom guaranteed under our Constitution.”

The apex court was of the opinion that the binary notion of gender as recognised by the Constitution of India, promotes discrimination against transgender people and denies them equal protection of laws in all spheres of the society. Furthermore, in NALSA v. Union of India, the Supreme Court accepted that

“Discrimination on the ground of sexual orientation or gender identity, therefore, impairs equality before law and equal protection of laws and violates Articles 14 of the Constitution of India.”

Undeniably, recognising transgender people as a third gender will enable them to enjoy “human rights” which include right to life, liberty, dignity, privacy, freedom of expression, right to education, empowerment, right against violence, right against exploitation and discrimination. The historic judgement, while ensuring justice to the transgender persons accepted that the time has come when equality before law should not be confined in papers, rather it should translate the very spirit of the Constitution of India as enshrined in the preamble, Part III and Part IV of it. The NALSA judgement granted them legal recognition as the third gender and declared

“Moreover, human rights exist irrespective of the question whether they are granted or recognised by the legal and social system within which we live. They are devices to evaluate these existing arrangements: ideally, these arrangements should not violate human rights. In other words, human rights are moral, pre legal rights. They are not granted by people nor can they be taken away by them.”

NALSA vs. Union of India, AIR 2014 SC 1863.
It is in this regard the apex court has directed the Central and the State Governments to take necessary steps regarding their social and economic upliftment and to treat them as socio-economically backward classes of citizens and to extend them all kinds of reservations in educational institutions and for public appointments.

Subsequently, the Transgender Persons (Protection of Rights) Act, 2019 came into existence and the National Council for Transgender Persons was also set up under this law for the redressal of grievances of such persons. Later in 2020, the Transgender Persons (Protection of Rights) Rules, 2020 came vide notification of the government of India. Rule 12 provides for equal opportunities in employment and requires every establishment to implement all measures for providing a safe working environment in order to ensure that transgender persons are not discriminated in matters relating to working environment, however, it remains silent on the issue of reservation policy for them.

Recently, the Supreme Court while dealing with a petition demanding reservation in employment and education of the transgender persons asked the centre, state governments and union territories to extend the reservation policy to them. The petition was filed by a transgender from Kerala, Subi KC who cited the 2014 Supreme Courts’s NALSA judgement. The landmark judgment had already paved the way for recognising the rights of transgender people. The Supreme Court bench was headed by the Chief Justice of India D.Y. Chandrachud who asserted that under Article 16 of the constitution of India along with Arts 14, 19 and 21, the transgender people are entitled to reservation in public employment.

4.1 IMPACT OF ECONOMIC EXCLUSION ON TRANSGENDER RIGHTS

The socio-economic and political foundations of any society largely decide the distributions of benefits and burdens among its members. These foundations are the result of human evolution and processes which constantly change over time and are capable of affecting human lives. The principles of ‘distributive justice’ are a kind of moral guidance which affects the distribution of benefits and burdens in the society. The four fundamental principles of distributive justice i.e., equity, equality, need and entitlement are very important in allocating and distributing the benefits and burdens in the society. For a fairer and egalitarian society it is important to ensure non-discrimination and equitable distribution of the burden and benefits among the members of society. While human
rights principles can undergird equality and non-discrimination on one hand, appropriate state socio-economic policies and enforcement measures can ensure equality and fair distribution of the benefits and burdens on the other hand. Unfortunately, despite getting legal protection in India, transgender community still lack recourse against socio-economic discrimination, stigma and pervasive inequality.

Figure 1: Transpopulation in India, 2011

The world Bank in its 2014 report argues that the cost of economic exclusion of transgender people in India cannot be undermined. The report confirms that employment discrimination has to a very great extent adversely affected the productivity and output of Indian economy (see Badgett, 2014). The workplace discrimination and healthcare disparities are the two domains that are very much closely related and are potentially capable of reinforcing the impact of exclusion on transgender people (see Badgett, 2014). In fact, many studies have even confirmed that such kinds of discrimination and unaccepting environments are capable of psychologically depressing transgender people that they find very difficult to overcome, which in turn adversely affects their incentive to get training and education. This vicious circle translates into low investment in human capital and suboptimal opportunities for them resulting in lower productivity of overall economy. As per the census of 2011 only 46% of the other gender people are literate. The
literacy rate is extremely low when compared with the other population having 74% of literacy rate in the year 2011.

Economic exclusion of transgender people may have several negative socio-economic implications:

- Lower investment in human capital and lower wages leads to further impoverishment of the transgender community.
- Absence of opportunities, unemployment and underemployment among the transgender people reduces their productivity and contribution in economic development.
- Workplace discrimination and social stigma causes underutilisation of ability of transgender workers who are easily replaced by other unskilled or favoured workers.
- Underutilisation of the potential of transgender people may result in economic inefficiency.
- This inefficiency will adversely affect the overall output of the economy.

Therefore, at this juncture it is very important to realise and accept that the equity, equality, need and entitlements of the transgender people should not go unaddressed. Undeniably the socio-economic inclusion of the transgender people can always be linked to economic development of the country as there is a direct and positive relationship between socio-economic wellbeing of an individual and individual’s productivity and ability to do work. The two are mutually reinforcing.

4.2 ECONOMIC EMPOWERMENT THROUGH “ECONOMIC JUSTICE” AND “EQUALITY OF OPPORTUNITIES”

The objective of safeguarding human rights and ensuring respect for diverse cultural norms needs sophisticated approach which inter alia must include endeavour to establish global norm of upholding human rights. The USAID in one of its research projects concluded that economic development and LGBT rights are very closely related (see Badgett et. al., 2014). In fact, economic inclusion of such a community may lead to greater social acceptance. Some of the immediate measures required for their greater social acceptance can be:

• Identifying the economic needs of the transgender people
• Increasing both public and private opportunities to address such needs
• Inclusion of transgender people in various social assistance programmes like direct benefit schemes, cash transfers etc.
• Imparting skill enhancement trainings and coaching to strengthen poor transgender community
• Facilitating various start-ups to support transgender people to own business.
• Increase trans-inclusive employment opportunities

In this regard it would be worth mentioning, the macro-level analysis and the positive correlation established between per capita income, GDP and the legal rights of the transgender people. In a study done by the Global Index on Legal Recognition of Homosexual Orientation (GILRHO) and Transgender Rights Index (TRI) it was found that both GDP per capita income and HDI are higher in countries where more rights are given to the transgender people. This simple correlation can be explained as one additional right is related to the increase of $1400 more in per capita GDP with high HDI value (see Badgett et. al., 2014). In other words, countries granting more rights to the transgender people achieved high per capita income with increase in the living standard. A high level of HDI always signifies that the quality of human life is measured beyond pure economic considerations and even outcomes.

Dignified and equal cohabitation of people have been recognised as something very significant and therefore, the human rights regime in the country must contain the necessary rules in this regard. For a country like India, many empirical studies have confirmed that discrimination against transgender people exists at workplace. A survey conducted in 2013 on educated, transgender workers in India found that 56% of them had faced discrimination on the basis of sexual orientation at their workplace (see Badgett, 2014). The 2011 Census of the Indian population revealed that a total of 490,000 individuals reported their gender as third gender. However, the experts are of the opinion that the figure is underreported by the transgender people due to their stigmatized status. Nevertheless, given the data of the transgender people, they need more accepting environment and a more comprehensive plan by the government to bring them in the mainstream. Socio-economic discrimination is adversely affecting their prospects of

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better education and employment which in turn translates into low productivity, decreased output and inefficiency. It is obvious that failure to remove the widespread discrimination and exclusionary practices against the transgender people will keep them under impoverished condition and they will remain compelled to make their living through begging, sex work and other illegal activities.

Undoubtedly, transgender people in India are blatantly denied employment opportunities and even if they are given employment, social stigma and discrimination makes them earn insignificant and way lesser than their co-workers. A field survey conducted by NHRC (Study on Human Rights of Transgender as a Third Gender) in Delhi and UP confirmed that 96% of the transgender people are denied jobs and are forced to work as low paying jobs like badhais, sex work and begging.

<table>
<thead>
<tr>
<th>Employment/Livelihood</th>
<th>Transgender in Delhi</th>
<th>Transgender in UP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Badhai/Blessings/Singing/Dance</td>
<td>99</td>
<td>121</td>
</tr>
<tr>
<td>Begging</td>
<td>54</td>
<td>18</td>
</tr>
<tr>
<td>Sex work</td>
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<td>18</td>
</tr>
<tr>
<td>Beautician</td>
<td>20</td>
<td>9</td>
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<tr>
<td>Tailoring</td>
<td>13</td>
<td>18</td>
</tr>
<tr>
<td>Sales of food items/fruit/veg</td>
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<td>68</td>
</tr>
<tr>
<td>Miscellaneous work domestic help</td>
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<td>32</td>
</tr>
<tr>
<td>Miscellaneous work in private sector</td>
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<tr>
<td>Social work/NGO</td>
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<td>76</td>
</tr>
<tr>
<td>No Response</td>
<td>42</td>
<td>50</td>
</tr>
</tbody>
</table>

Source: Study on Human Rights of Transgender as a Third Gender (February, 2017), submitted to NHRC by Kerala Development Society.
Majority of the transgender people in Delhi and UP somehow manage their living through informal sector. Unfortunately, no one is employed in any of the government sectors. Under these circumstances the economic misery of the transgender people is never going to be resolved.

So far as current state of trans employment in India is concern, some positive steps have been taken by the private firms, governments and civil society organisations.

- Kerala’s Kochi Metro Rail Limited employed 23 transpersons in 2017 but they could not retain their jobs due to refusal by landlords to provide them accommodation.
- Likewise in 2019, a transgender person in Gorakhpur (UP), was offered the job of a train driver/technician along with other male and female shortlisted candidate.
- Noida Rail Corporation in 2020 dedicated one of its railway stations to the trans community and recruited them on contract.
- Karnataka became the first state government in India to allocate 1% reservation for the trans person in public jobs.
Bihar has decided to recruit transgender person in the state police force and other departments and would also give them reservation benefits by clubbing them with other backward class (OBC).  

A menstrual cups manufacturing unit will be operated in Bihar exclusively by the transgender person.

5 RESULTS

However, the above help seems to be of very little and insignificant one in front of enormity of the issue which can be resolved to a great extent if there is horizontal reservation in education and fair employment opportunities in most of the sectors of the economy. Unfortunately, the Transgender Persons (Protection of Rights) Act, 2019 is silent on reservation for employment and education of transgender people. The Hon’ble Supreme Court in its historic judgement has directed the centre as well as state governments to extend “all kinds of reservations” in admission to educational institutions as well as employment opportunities.

The absence of uniformity in implementation of reservation for the transgender community and reservation related guidelines in the NALSA judgement has resulted in different states applying different schemes like:

- Kerela, Karnataka, Bihar have recognised horizontal scheme
- Tamil Nadu vertical scheme of reservation
- Other states yet to come with the reservation policy

On the issue of horizontal and vertical reservation of transgender persons, there exist a lot of considerations (social, educational. Economic, legal) that need deliberation and consideration from an intersectional lens before coming up with a solution or a model. However, if transgender people are given horizontal reservation with a consideration of their respective caste or class in which they fall then it will result in overlooking other aspect of their disadvantaged life. For them socio-economic disadvantage is far more than the issue of caste and related status. Interestingly, most of the transgender people form their own class irrespective of their caste. In a deep-rooted caste-based society like India, it is very likely that gender identity and related bias worsen the position of transgender people. In fact, such bias dwarfs the caste status and for a transgender person it becomes


meaningless. Vertical method reservation can secure or peg the transgender persons in category of the backword classes but will undoubtedly ignore their caste status. Transgender people will have to face a trade-off between caste or gender identity in the case of reservation policy. Nonetheless, horizontal reservation will enable the disadvantaged group to apply in each vertical category like SC/ST/OBC and General.

6 CONCLUSION

In order to have a just society and gender justice for all, social behaviour and outlook of the society has to undergo a sea change. Transgender people need to be given their legitimate place in society. They are not inferior to men and women and are equally entitled to enjoy economic, social, cultural, political rights without any discrimination. The exclusionary and discriminatory practices against them have severe economic implications like inefficient allocation of resources, low productivity, under investments in human capital, poverty and overall low output in economy. The short analysis done by the author is clear in its finding that there exists a direct relationship between the realization of the constitutionally guaranteed rights for the transgenders and their economic inclusion. With desired, coordinated socio-economic policy on full inclusion of transgender people, their contribution in the economy can increase many folds. The Central Government has constituted its first National Council for Transgender Persons in the year 2020, with the Union Minister of Social Justice & Empowerment as its chairperson, with a purpose to increase awareness about rights of transgender people by way of evolving a comprehensive legal protection regime for them, but extensive work is required to address the issues of trans-community and their livelihood concerns. Some immediate and significant efforts have to be taken to formulate socio-economic policies for the transgender people such as:

- Address the problem of inequality and discrimination against the transgender people through a national policy;
- Formulate adequate socio-economic framework to acknowledge gender diversity and their inclusion in the society beyond the conventional dichotomy of male and female.
- Gender sensitive approach at every level and in every sector of the economy by the policy planners and civil society, government and non-government organisations.
Government run several awareness programmes related to homophobic, biphobic and transphobic behaviour in schools, colleges, universities and even workplaces.

Action against hate crimes against transgender people by increasing police response

Government as well as non-government organisations run outreach health services programmed for transgender people who are unable to avail the existing services due to socio-economic discrimination.

In fact, the findings would be incomplete if the United Nations Millennium Declaration and related Development Goals (MDGs) which were adopted by member states are not brought into discussion. The landmark blueprint was prepared for the member states to effectively promote gender equality in most efficient ways to combat poverty, disease, hunger and other socio-economic parameters required for their sustainable development. Furthermore, the UN has also recognized and ensured the inclusion of the LGBTI people in formulating the national policy and has endorsed the principle of “leave no one behind” in their 2030 Agenda of sustainable development goals (see Park & Mendos 2019). At this juncture, therefore, it is utmost important to acknowledge the specific needs and requirements of this community and reduce inequality within the economy and promote inclusion of all for a safe, resilient and sustainable economy.
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