

## The Socio-Legal Exploitation of the Third Gender in India

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**Abstract:** *This paper is an attempt to shift the focus of the discourse of social justice, from distribution or redistribution to a dignified recognition, primarily with reference to the injustices associated with sexuality and gender, both of which are viewed by the author as socio-cultural and are seen to be rooted in social patterns of representation, interpretation, and communication.*

*The main objective has been to throw light on the status of transgenders in India, in the background of the courts having acknowledged the travesty of their being, and despite being sympathetic to them to the extent of even affording recognition, have been unable to ensure a dignified existence to them.*

**Key words:** *Gender, Sexual Orientation, Yogyakarta Principle, Transphobia*

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### I. INTRODUCTION

Any discussion on the Third Gender must begin with the distinction between the much ignored or may be deliberately under-played difference between the concepts of 'gender identity' and 'sexual orientation'. Gender identity refers to a person's deeply felt internal and individual experience of gender, which may or may not correspond with the sex assigned at birth. Sexual orientation, on the other hand, refers to the individual's enduring physical, romantic and/or emotional attraction to another person. Both of these are integral to one's personality and are aspects of self-determination, dignity and freedom. Unfortunately, by defining individual identity purely in biological terms, most of the literature before 1960s failed to distinguish sex from gender, and sexual differentiation from sex discrimination.

Author opines that the sexual orientation, which lies at the core of "private space", is expressed through sexual relations and ought to be viewed as a core part of individual identity and as an inalienable component of the Right to Life. Therefore the prohibition of certain private, consensual sexual relations under section 377 unreasonably abridges the right of privacy and dignity within the ambit of Right to Life and Liberty under Article 21 of the Indian constitution. In a similar wave of thought lies the observation of L'Heureux, who notes that at the root of dignity, lie the autonomy of the private will and a person's freedom of choice of action.<sup>i</sup> Justice V.R. Krishna Iyer, in *Prem Shankar Shukla v. Delhi Administration*,<sup>ii</sup> observed that human dignity is concerned with both physical and psychological integrity along with empowerment. He added that this dignity is enhanced by laws which are sensitive to the needs, capacities and merits of different individuals, taking into account, the context underlying their differences. In *Francis Coralie Mullin v. Administrator, Union Territory of Delhi*,<sup>iii</sup> the Supreme Court argued that the 'Right to dignity includes expressing oneself in diverse forms...all of which is essential for the complete development and evolution of persons'.

In this background, the current paper makes an attempt to highlight the exploitation which the victims of injustice with alternative identities have been subjected to, both socially as well as legally. Postulating a repressed and homogenized identity, efforts have been made to discover, acknowledge and represent their fundamentally concealed identity. But the author is conscious of the fact that by claiming an independent identity, we can reverse or struggle with an oppressive gaze though we cannot back out of it and replace our muted or distorted identities with a real and authentic one. Further, fixing an autonomous identity always presumes a fixation of the "interpellating other",<sup>iv</sup> a "respond to a request"<sup>v</sup>, in which the moment of subjection necessarily implies oppression. The person-as-subject in such a situation is defined by the other and the person recognizes themselves as an image or reflection of the 'other'.

### II. RESEARCH METHODOLOGY

The research methodology is primarily qualitative and draws from both primary and secondary sources. The author admits that it was extremely difficult to stand upright on the threshold of objectivity, for the victimized transgenders lacked voices, as the social stage has been quite unwelcoming for the majority of them. Some of the key informants included transgenders (primarily Male to Female), police officers, lawyers, media people, representatives from the civil society and the youth (primarily those between 18-20 years of age). The

analysis focused on comparing the data collected and assessing the degree of the compliance with the international human rights.

The focus has been framed through the (de)constructivist theories of sexual identity, taking its roots primarily from Judith Butler's works,<sup>vi</sup> which suggest that identity-based politics, instead of superseding marginalization, actually work for reinforcing it.

### **III. SOCIAL RECOGNITION: BIOLOGY VS. PSYCHOLOGY**

Yet, generally speaking, social recognition is distinct from the self-perception of one's identity, for social recognition is primarily how the wider society perceives an individual and this mental snapshot is usually framed within a stereotypical image. Any distinct images, beyond the hetero-normative duality of sexuality, which might fall in sync with one's self-perception, is seen as a category away from normalcy and conveniently slipped into the pool of covertures, deviants.

Since time immemorial, the injustices of sexuality have been caught in the web of the Corbett principle,<sup>vii</sup> which set forth a biological test and ignored the psychological test. A biological determinist view like that of Geddes and Thompson<sup>viii</sup> argues that the social, psychological and behavioural traits are caused by metabolic states. This dominant biological identity derives its power from the chromosomal make up. On the other hand, the dormant psychological existence tries hard to stagger through the narrow lanes of individualized sexual orientations, which seem to be too personalized to travel through public previews, (though interestingly, they still get caught up in coffee table books on public morality and the voluminous legal verdicts). More specifically, this biological determinism is used primarily as a tool to withhold the rights of the members of the society, other than those who fall within the binary category of males or females.

Until the 1960s, the term 'gender' was primarily used to refer to feminine and masculine references. In 1968, Robert Stoller,<sup>ix</sup> while writing on trans-sexuality began using the term 'sex' to refer specifically to the biological traits and the term 'gender' to refer specifically to the degree of femininity and masculinity exhibited by a person. In fact he was the first one to introduce the concept of "gender identity". Despite the intellectual understanding (which, in turn, originated from the parallel feminist movement), till the 1990s, transsexuals were deprived of a dignified social existence. It was for the first time, in 1992,<sup>x</sup> that the European Court of Human Rights concluded that there had been a violation of Article 8<sup>xi</sup> of the European Convention on Human Rights, in a case concerning the recognition of transsexuals. With specific reference to India, around 2008-09, the state of Tamil Nadu introduced a transgender welfare policy, enabling them to access free Sex Reassignment Surgery (SRS) in the government hospital, free housing programme, various citizenship documents, admission in government colleges with full scholarship for higher studies, alternative sources of livelihood through formation of self-help groups (for savings) and initiating income-generation programmes (IGP). To this effect, the then Minister of Finance, in the government of Tamil Nadu, while presenting the Budget for the session of 2008-09 in the Legislative Assembly, commented, "*Welfare of Transgenders - ... Viewing transgenders with compassion as in the case of disabled persons, this Government has been providing a helping hand to them by establishing a separate welfare board for them and issuing them family cards. Transgenders will be given vocational training and will be facilitated to take up vocation either individually or as Self Help Groups. In addition, as per the new Small Industries Policy, special incentives have been provided for industries started by transgenders. This Government will extend financial assistance to establish a transit home for transgenders in transition through NGOs.*"<sup>xii</sup>

In other parts of the world and in judicial systems of all jurisdictions, amongst the catena of legal judgements which relate to members of the 'third gender', the 1993 pronouncement by Justice Lockhart<sup>xiii</sup> stood out. Justice Lockhart was amongst the first few who socially engineered individual recognition, and argued that it should not be regarded merely as a matter of chromosomes but rather be treated as a purely psychological question, balancing upright partially on self-perception and partially on social perception. However, unfortunately, the binary notion of gender, from which is derived the Corbett Principle, reflects itself in the Indian Penal Code (IPC) and also in other Indian statutes related to marriage, adoption, divorce, succession, and even some welfare legislation. This is seen by the author as a complete violation of human rights because ignoring the psyche of the individuals, in this specific case, the transgenders, causes immense discomfort, distress and psychological trauma, which has a high probability of narrowing down to Gender Identity Disorders (GID) such as "gender dysphoria",<sup>xiv</sup> which could further lead to mental disorder.

### **IV. PLIGHT OF THE THIRD GENDER IN INDIA**

The dilemma of conformity and non-conformity has always been so patriarchal in India that one doesn't need to dwell any further to relate to the fact that as objects of desire, be that be through occasional empowerment because of the fear of being offensive to Goddess *Bahucharaji* (the giver of masculinity) or

merely to satisfy occasional sexual urges through explorations guided through the lanes of *Kamasutra*, the people with 'third nature' (*Tritiya Prakriti*), popularly known as the transgender have often been subjected to abuse, and have been mocked and ignored at. The term 'transgender', generally refers to people who transgress social gender norms. They are relegated to a status similar to the 'low-status ethnic group' in the Weberian paradigm, whom dominant cultural patterns of interpretation and valuation mark as different and less worthy, to the detriment of groups members' social standing and their chances of winning social esteem.<sup>xv</sup> Their sexuality is interpreted as deviant and devalued in the dominant culture. Be it be under the celebrated guise of Hindu mythological 'sacred' characters such as *Brihanalla* or *Shikhandani*, or the innumerable 'others' with desires on the margins of society and pleasures and bodies outside the assumed arenas of social reproduction, transgenders have always been portrayed with an abnormal differentness, which is in conflict with normal binary of social beings, the male and the female.

In fact this 'away from the normal category' of individuals, is not a homogeneous group. It has its own segments, making the group heterogeneous and this is very often overlooked. What enhances the heterogeneity is that the differences and contradictions exist not just between identities, but also within them<sup>xvi</sup>. With specific reference to India, this 'beyond binary category' is divided into *Hijras*,<sup>xvii</sup> *Kinnars*, *Eunuchs*,<sup>xviii</sup> *Aravanis/Thirunangi*,<sup>xix</sup> *Kothis*<sup>xx</sup> and *Shiv Shakthis*.<sup>xxi xxii</sup> Since this heterogeneity has no acceptance in the world of the 'biological normal' therefore there is an apparent invisibility of empathy towards them. This is apparent from the comparative study of the categories of the *hijras* and the *thirunambis* in India, both of whom are transgender but *hijras* are Male-to-Female (MTF), while *thirunambis* are Female-to-Male (FTM). The *Hijras* have self-organized themselves into a cultural and social space through a *Guru-Chela* system under seven main *gharanas* (clans) and have their own internal legal system called *Jamaats*, where senior *hijras* play the role of judges and solve disputes between themselves. Ignoring this heterogeneity, the SRS, as a part of the transgender welfare scheme in Tamil Nadu, is applicable only for the *Hijras* and not for the FTM category, popularly known as *thirunambis* (some of whom are categorized as lesbians), leaving the latter to struggle at the threshold. The prejudiced society at large and the myopic concerns of our parliamentarians and the judiciary have been to a great extent responsible for their social exclusion, compelling them to be enclosed in labels. Since it is the (op)position that creates a community, which is otherwise not homogeneous, the different sub-identities are often put aside and with globalized simplicity, clubbed into community of LGBTIQ (lesbian, gays, bisexual, transgender, intersex and queers) overlooking the fact that a definitive, easily-conceivable LGBTIQ identity does not exist. The specificities of this identity are formed with respect to the wider socio-political conditions with their persona been variously constructed – as deviant practice, as adverse ideology, and as a social indicator. While keeping the hetero-normativity of the alternative sexualities in mind, the fact remains they all, collectively suffer from heterosexism: the authoritative construction of norms that naturalize heterosexuality and stigmatize homosexuality. These heterosexist norms operate not only at the level of cultural attitudes but also skew entitlements and delimit understandings of personhood. As a result, they suffer sexually-specific status injuries. Research highlights how transphobia has permeated the different structures of the society, family and institutions, robbing them of their human dignity and marking their lives by dynamics of exclusion which begins when they are thrown out or decide to move out of their homes and are essentially excluded from the educational and health care systems. The gravity of the problem enhances when viewed through the lens of Mills' Sociological Imagination<sup>xxiii</sup> for this exclusion is not a personal trouble located at an individual platform but rather a public issue, wherein the entire social and cultural landscape is to be held accountable. The lack of education and access to job opportunities pushes a substantially large number of persons with alternative sexualities into prostitution, which makes them vulnerable to contracting HIV and other Sexually Transmitted Diseases (STDs). This is statistically notified by the 2013 data released by AVERT<sup>xxiv</sup> according to which the transgender people are emerging as a group at high risk of HIV transmission in India.

Denied the full rights and protections of citizenship, they endure shaming and assault; exclusion from the rights and privileges of marriage and parenthood; curbs on their rights of expression and association; the absence of sexual autonomy; demeaning stereotypical depictions in the media; harassment and disparagement in everyday life; and exclusion or marginalization in public spheres and deliberative bodies, all of which are injustices of recognition. After 2014, in India, they got caught into the politics of recognition, where in they have been labelled and herded into the category of 'the others' on the electoral rolls for the Lok Sabha polls rather than being acknowledged with dignity as the 'third gender', as done on the Aadhar card.<sup>xxv</sup> Interviews revealed that the term 'eunuch', used on the passports, was felt to be highly derogatory while the use of 'transgender' or 'third gender' would have been more empathetic in its tone. To add to the mounting victimization of being shelved, the 2011 census shows that there were a total of 4.9 lakh transgenders in India. However, the respondent community activists claimed that the actual number is very high and the discrepancy is primarily because the data collection methodologies which failed to capture the entire transgender population primarily due to, fears of prejudicial reactions, differing terminologies employed, and other factors in the data

collection process. Another important observation made by the census data was the low level of literacy in the community, i.e. forty six percent, compared to the seventy four percent in the general population. The respondents vehemently argued that this is primarily because of high dropout rate due to harassment and discrimination.<sup>xxvi</sup>

It was overwhelmingly felt that those with alternate sexualities were caught up in a viciously painful cycle wherein at the one end of the tangent, the various forms of violence, such as emotional, mental and even physical, experienced by the transgenders as a part of their everyday experience, mutes them into a culture of silence, while at the other end, the non-recognition of their identity makes them further vulnerable to harassment, violence and sexual assault. Some of the most common human rights violations reported by transgenders included extrajudicial executions, torture and other cruel, inhuman and degrading treatment, arbitrary detention, threats and extortion. But this is not an exhaustive list. Moreover, they are not addressed separately. It was reported that the authorities themselves help foster prejudice by describing such cases as “crimes of passion”, emphasizing aspects of the personal lives of the victims instead of their vulnerability as transgenders and human rights defenders. Witten and Eyler in their interactive text over viewing aging for sexual and gender minorities observed that:

*“Perpetrators often believe that a person who transgresses the norms of gendered sexuality, either by engaging in sexual relationships with members of the “non-opposite” gender, or by behaving “as” the other gender, is deviant or morally defective, and thus a deserving victim of violence and aggression. Xenophobic elements, such as the persecution of transgenders [sic] by neo-Nazis, have also been reported, as has a preference by assailants, in some cases, for attacking male-to-female transgenders [sic] or transsexuals who are members of racial minorities.”<sup>xxvii</sup>*

Ninety four percent of the respondents also reported of transphobia even in the justice system whereby they are subjected to taunts and aggression, when they tried to file a complaint. It was observed that this was primarily because laws against sexual violence, exploitation and trafficking do not adequately and explicitly differentiate between sex work that is carried out willingly and the illegal trafficking of people. This results in police authorities criminalizing sex work and has a consequent negative effect on transgenders, who are left at risk of abuse, unlawful detention and extortion. Further the association of deviance with differentness is seen as being repulsive to the existent social order and seems to involve anti-social behaviour, diminished empathy, and lack of inhibitions.

## **V. LAWS IN INDIA: VIOLATIVE OF HUMAN RIGHTS**

Given this background, the Ministry of Social Justice and Empowerment in its ‘2013 Expert Committee Report’, observed that a lack of recognition before the law is itself a human rights violation and this presents a major barrier to the transgenders in realizing other basic rights. The report noted, “Article 5 of the Constitution identifies the person who is entitled to be citizens of India. None of the conditions specified therein require a determinate sex or gender identity as a pre-condition of acquiring citizenship.”<sup>xxviii</sup> Though there is no articulate mention of transgenders in either the statutes of India or the legislation, leaving them invisible and dependent on how general clauses relating to their human rights protection are interpreted, yet there are some legal provisions which passively provide rights to them. Further, India has ratified most of the international treaties with specific reference to the broad purview of human rights, be it be with regard to children, women, disabled or the elderly but since long there has been a disconnect between the plight of the transgenders and the Yogyakarta Principles, which were developed by a coalition coordinated by the International Service for Human Rights and the International Commission of Jurists and were formally adopted by a panel of leading international law experts way back in November 2006. These provide authoritative guidance on the human rights of LGBTIQ and the obligations of states to promote and protect these rights, ensuring full equality and addressing discrimination. It is because of this disconnect that the perpetration of human rights violations, on grounds of sexual orientation and despite the ratification, on ground of gender identity, is a common practice and is entrenched in India, to the point of being systematic, while discrimination on the same ground is institutionalized.

With regard to the domestic laws, Article 51 of the constitution of India, strives to promote international peace and security and foster respect for international law and treaty obligations in the dealings for international law and treaty obligations, and is supplemented by Article 253, which necessitates the state to create legislations for giving effect to international agreement. While reading the two together, we understand that in the absence of a contrary legislation, municipal courts in India would respect the rules of international law. Therefore, any international convention not inconsistent with the Fundamental Rights and in harmony with its spirit must be read into these provisions, for example, articles 14, 15, 19 and 21 of the constitution. Article 14 states that the state shall not deny to “any person” equality before the law or equal protection of the law. The article does not limit the term “person” to just male or female. Article 15 prohibits discrimination by the state on ground of ‘sex’ with regard to access to shops, hotels or use of well, tanks and other public places; Article 16

guarantees equal opportunity for employment irrespective of sex, but unfortunately, despite these articles, India still has discriminatory laws that contravene international human rights law. Further, though the articles do address and attempt to redress sex discrimination, transgenders are still systematically denied rights under articles 15(2) and 15(4), with almost the entire onus on the state.

Under Article 19(1) (a) certain basic freedoms, which constitute as human rights, are granted as natural rights to all the citizens of India including, right to freedom of speech and expression of his self-identified gender and the right to choose one's personal appearance. Though the values of privacy, self-identity, autonomy and personal integrity are guaranteed to the members of the transgender community under it and the state is bound to protect and recognize these rights, but in many cases, there exists a disassociation between their gender, their social name and their identification documents which dehumanizes them and also denies them their civil and legal status. The greatest and most inclusive constitutional provision is Article 21 which states that no person shall be deprived of life or personal liberty except according to procedure established by law commonly understood as "Right to life", which includes within it self-determination of gender which is an integral part of personal autonomy. However, somehow we have failed in letting the people with alternate sexualities live a life with respect and dignity.

## VI. JUDICIAL ROADBLOCK

While the crowd in America is celebrating the decision of the US Supreme Court in *Obergefell v. Hodges*<sup>xxix</sup>, we, despite being world's largest constitutional democracy, are still grappling in the heteronormative caves of undermining alternative sexualities. In 2009, the fundamentals behind the Fundamental Rights seemed to accomplish a triumph for the alternate sexualities when the Delhi High Court held section 377 of IPC, which categorized any penile non-vaginal activity as an unnatural offence, in violation of the Fundamental Rights enshrined in the Constitution of India, insofar as criminalising consensual sexual acts of adults in private. It was further stated that, "Where society can display inclusiveness and understanding, such persons can be assured of a life of dignity and non-discrimination."<sup>xxx</sup> However this celebration was short lived as the Supreme Court in *Suresh Kumar vs. Naz Foundation*,<sup>xxxi</sup> in 2013, set aside the decision of the High Court declaring "that this Court has merely pronounced on the correctness of the view taken by the Delhi High Court on the constitutionality of Section 377 IPC and found that the said section does not suffer from any constitutional infirmity." It was further held that amending or repealing Section 377 should be a matter left to Parliament, not the judiciary and the Supreme Court subsequently dismissed the review petition against the verdict. This reinstatement of Section 377 resulted in deep unrest amongst the society with various debates being held across the country and influencing people of high offices such as a former Minister of foreign affairs, India, calling for the arrest of American diplomats in India having same sex companions. The US Supreme Court, in its above mentioned 2015 majority judgment had argued that the Fundamental Rights of a citizen are beyond the whims of the majority and the bondages of the Parliament, which empowered the members with alternate sexualities to directly invoke their right to constitutional protection before a court, when curtailed. Though in this case, it was specifically in the background of recognizing the marriages of the same-sex couples but by expansive interpretation, it should be seen as an essential component of a life with dignity.

In April, 2014, taking the aforementioned domestic laws into consideration along with various case laws, the Supreme Court in *NALSA vs. Union of India*<sup>xxxii</sup> did grant constitutional recognition to the transgenders as third gender stating that they did form a distinct group and any discrimination towards them was violative of their constitutional rights. However, the Court observed that, 'The modern definition of transgender', would include only the gay, lesbian and bisexual, further directing the government to treat them as a 'socially and educationally backward class', entitling them to quotas like those for the Other Backward Classes, in educational institutions and for public appointments. Though 2014 judgment does exhibit a remarkable empathy in describing the "trauma, agony and pain" experienced by the transgender community but it stopped from going any further by building a degree of disassociation with the wider meaning of the expression 'transgender'.

As a result, though 'transgenders' have been recognised, the other persons with alternative sexualities have not really been recognised, either by the society or by law. Further, though the members of the transgender community have been granted certain rights, they have been deprived of one of the essentially basic in nature right, that other people who fall within the heterosexual duality take for granted, and this right is the right to love with dignity. Love is a stream of emotions which may or may not get stereotyped in the institution of marriage. Further marriage must not be associated with procreation, for this would also question the status of single parents and those already suffering under the stigma of infertility. Thereafter, in February 2016, submitting to the plethora of protests and debates, the final hearing of the curative petition submitted by the *Naz Foundation and Others* came for hearing in the Supreme Court, in which the three-member bench headed by the

Chief Justice of India T. S. Thakur said that all the 8 curative petitions submitted would be reviewed afresh by a five-member constitutional bench.

## VII. CONCLUSION

The road to the legal recognition of the transgenders as a third gender has been, and continues to be a long and difficult one. It is very essential to invoke judicial activism, resulting in a shift in constitutional meaning rather than initiating an amendment, and also being cautious of not treating court as a majoritarian institution. With a history of reverence but a reality of discrimination it's almost unimaginable how it is taking the state and the society so long to legally recognize them as dignified alternate sexualities, so that they no longer have to resign to a life that forces them to identify themselves either as a male or female.

Appointments of people like Manabi Banerjee,<sup>xxxiii</sup> who strike at the walls of stereotypes and voyeuristic prying about alternative sexualities, will be hailed all triumph of broad-mindedness. She and many others<sup>xxxiv</sup> like her is a blow to the cloud of ignorant stereotypes, which see transgenders merely as beggars, hecklers and sex workers. Unfortunately, it is this mass rejection of their individuality that render so many of them unfit for any kind of employment, turning them to a life of abuse.

## Acknowledgement

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- [2] Prem Shankar Shukla v. Delhi Administration, 1980 AIR 1535
- [3] (1981) 1 SCC 608 (paras 7&8)
- [4] Althusser, Louis. (1989). Ideology and ideological state apparatuses. In *Lenin and Philosophy and other Essays*. London: New Left Books (pp. 170-86)
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- [8] \_\_\_\_\_. (1993). *Bodies that matter: On the Discursive Limits of "Sex"*. New York and London: Routledge
- [9] Corbett v. Corbett (1970) 2 All ER 33. The Court in England took the view that the law should adopt the chromosomal, gonadal and genital tests, and if all the three are congruent, that should determine a person's sex for the purpose of marriage. The Court further added that the biological sexual constitution of an individual is fixed at birth and any operative intervention should be ignored.
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- [14] <http://www.assembly.tn.gov.in/budget/Budgetspeech2008-2009.pdf>, Speech by Prof. K. Anbazhagan, Minister for Finance, State of Tamil Nadu, in the Legislative Assembly, dated 20<sup>th</sup> March, 2008. Last accessed on 1<sup>st</sup> April, 2016
- [15] Secretary, Department of Social Security v. "SRA" (1993) 43 FCR 299
- [16] Term coined by Norman Fisk in 1973 referring to a feeling of an incongruence between sex and gender
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- [19] Biological males who reject their masculine identity
- [20] Emasculated males
- [21] Biological males who self identify themselves as a woman trapped in a male's body
- [22] Biological males showing varying degrees of 'femininity', which may be situational
- [23] Males who are possessed by or particularly close to a goddess and have feminine gender expression
- [24] Socialjustice.nic.in/pdf/appendix2.pdf
- [25] Mills, C.W. (1959). *The Sociological Imagination*. Oxford University Press
- [26] An international HIV and AIDS charity, based in U.K., working to avert HIV and AIDS worldwide, through education, treatment and care
- [27] A 12 digit individual identification number issued by the Unique Identification Authority of India on behalf of the Government of India. This number will serve as a proof of identity and address, anywhere in India
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- [31] Obergefell v. Hodges, No. 14-556, (U.S. June 26, 2015)
- [32] Naz Foundation v. Government of NCT of Delhi, 160 Delhi Law Times 277, (2009)

- [32] Suresh Kumar Koushal and another v. NAZ Foundation, 1 SCC 1, (2014)
- [33] National Legal Service Authority vs. Union of India and others, 5 SCC 438, (2014)
- [34] Principal of Krishnanagar Women's College, West Bengal
- [35] Padmini Prakash became India's first transgender television anchor; Kamla Jaan became the world's first eunuch mayor but was asked by the HC to step down, as the post was reserved for a female candidate. She was the mayor of Katni district for two and a half years since January, 2000; Shabnam "Mausi" Bano was the first transgender Indian to be an elected member of the Madhya Pradesh State Legislative Assembly from 1998 to 2003; Kalki Subramaniam is India's first entrepreneur