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Global Fight for LGBTQ Rights – A Look at How Far We’ve Come and The Road Ahead

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ABSTRACT

A society, however, ‘developed’ or progressive it may seem has always endured and enabled layers of discrimination against marginalized communities. To understand the success and prosperity of a society one must always probe, analyze, and review the rights, standard of living, and laws governing those who have endured gross oppression and are considered vulnerable. One such section of the society which has suffered reprehensible, despicable discrimination is the LBGTQ community. Throughout the world, the community has been ostracized, victimized, and has been subject to heinous mental and physical torture. The author in this paper aims to put forth the laws governing LGBTQ rights which exist in the USA, UK, Canada, and India. The author has made a comparative analysis of existing conditions and the rights of this marginalized community in the above countries. The author has shed light on the history of these countries and the pre-existing conditions under which these countries formulated their laws, identified certain shortcomings in these laws, and has provided her suggestions. The article also aims to paint a picture of the current conditions of the LGBTQ community existing today and seeks to answer whether the so-called most modern civilization of man has managed to integrate this community into society and have upheld their basic rights. Are The USA, UK, Canada, and India who are epitomized as countries who value, preserve and protect human rights, setting the right example and paving the way for other developing countries to recognize, rehabilitate and empower the LGBTQ community? The author aims to answer this and more.

I. INTRODUCTION

Over the past century, gay rights have been disputed and fought over globally, with the aspiration to achieve equality for all people. While the LBGTQ community has been recognized years ago, the true fight and advocacy for their rights have seen a prominent increase since the beginning of the 20th Century.

At present, there is extensive awareness about this community throughout the world, while their legal protection has become a pressing issue across many countries. With time, various

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legislations have been passed and conventions have been held to grant and restore their fundamental rights.

Although an extensive improvement has been made, the journey has been anything but simple. Gays have been subject to human rights abuse in almost every region across the world. They face violations such as murder, imprisonment, torture, and abuse even today. These sexual minorities have been ridiculed and differentiated consistently, with even basic educational and medical assistance being denied to them.

In India, the judiciary's decision declaring Section 377 of the Indian Penal Code unconstitutional, and thus decriminalizing homosexuality has been a breakthrough for the country. While progress and advancement have been made, the recent Transgender Persons Bill, 2019 caused a wave of criticism and dismay throughout the country, leading to many activists questioning if any progress has been made at all.

This paper seeks to compare the journey of the LBGQT community in leading countries across the world, and their situation today, along with analyzing where India stands and where we may have gone wrong.

II. THE UNITED STATES OF AMERICA

The history of the LBGQT community in the United States of America includes a plethora of emotions, struggles, and success. Right from the time where "sodomy" was considered as a capital offense in some States, the pre-eminent Stonewall Rights, the "Don't ask, Don't Tell" policy, formation of the first civil unions, landmark judgments legalizing same-sex marriage, and the ongoing proposals for the Equality Act - the country's advancements have been endless.

During early June 1969, the New York City Police raided a gay club called Stonewall Inn. As the police hauled all the employees and patrons out of the bar, this raid sparked the Stonewall Riots which in turn acted as a catalyst, transforming the gay movement from a handful of activists into a widespread protest for gay rights in the United States and across the world.² During the next ten years, as activism increased, Harvey Milk became the first openly gay city commissioner, and the 'National March on Washington for Lesbian and Gay Rights' in Washington D.C towards the end of 1979 became the largest political gathering in support of LBGQT rights till date. Soon after, Wisconsin became the first State to outlaw discrimination based on sexual orientation, and the "Don't Ask, Don't Tell" policy instituted in the U.S.

² Martin Bauml Duberman, *Stonewall: The Definitive Story of the LBGQT Rights Uprising that Changed America*. Plume (2019).

Military in 1993. This policy, under the Clinton Administration, permitted lesbian, gay, and bisexual persons to serve in the military, however barring them from disclosing their sexual orientation.³

The 2000s were pervaded with landmark judicial decisions, right from the landmark case of *Lawrence v Texas*, whereby the U.S Supreme Court declared all American Laws prohibiting private homosexual activity between consenting adults as unconstitutional⁴, to the case of *Obergefell v. Hodges*, which guaranteed the fundamental right to marry to same-sex couples as well.⁵ Following this case, adoption by same-sex couples also became legal, however, the policies vary State to State.

The U.S. Constitution guarantees all people, including the LGBTQ community “Equal protection of the laws”. State Constitutions contain similar protections as well. With respect to educational protection and youth laws, public schools are hence prohibited by the Federal Constitution from discriminating and taking any matters such as bullying and harassment less seriously just because the targets are LGBTQ children. A federal law called Title IX, which bans discrimination based on sex, protects students at schools that receive federal funds.⁶ Private schools on the other hand offer no such protection and often deny admission LGBTQ students and parents along with teaching an anti-LGBTQ curriculum. The community, especially transgenders, face an overwhelming amount of discrimination from health care providers. During the Obama Era Rule, it became illegal for doctors, hospitals, and other health care workers to deny care to someone whose sexual orientation or gender identity they disapproved of, due to which majority of the States now prohibit health care discrimination and have banned the use of harmful transgender exclusions. Currently, The Trump Administration finalized a Department of Health and Human Services administrative rule which in turn has scrapped the Obama-era policy that protected LGBTQ patients from discrimination.⁷ As per this rule, the federal government no longer recognizes gender identity as an avenue for gender discrimination in healthcare. While some argue this rule is necessary to eradicate existing confusion on the legal definition of "Sexual discrimination", critics

³ Tobias Barrington Wolff, *Compelled Affirmations, Free Speech, and The US Militaries Don't Ask, Don't Tell Policy* *Brook. L. Rev.* 63, 1141 (1997).

⁴ *Lawrence v. Texas*, 539 U.S. 558 (2003).

⁵ *Obergefell v. Hodges*, 576 U.S. 644 (2015)

⁶ 20 U.S.C. & 1681 (2014) (“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance...”).

⁷ Margot Sanger-Katz & Noah Weiland, *Trump Administration Erases Transgender Civil Rights Protections in Health Care*, *N.Y. Times*, June 12, 2020.

believe it could also prove to be fatal, harming and putting the entire community at risk during the ongoing pandemic.

Significant improvements have been made in the area of Criminal Justice Laws and Policies, whereby States have starting banning defenses such as "gay panic" and "trans panic" in an attempt to excuse violent crimes. In these defenses, the attacker tries to blame the victim's sexual orientation or gender identity as a cause for their violence.⁸ While policy changes have also been made by a few States to provide options for identity documentation, religious exemption laws prove to be a set-back. As of this year, the number of States having such laws in place has increased. These laws permit medical professionals, adoption or foster agencies, and more to explicitly refuse to work with LGBTQ people and others if doing so would conflict with their religious beliefs. As of today, after reviewing the LGBTQ community's journey in the United States one can proudly say they've come a long way. While positive advancements have been made in multifarious areas of law, the increase in religious exemption laws, and current President Donald Trump's decision to alter the health care laws only prove their battle is still not over.

III. THE UNITED KINGDOM

Over the last two decades, The United Kingdom has been one of the most progressive European countries in the aspect of LGBTQ rights and protection, holding the 7th position out of 49 countries in the ILGA Europe Rainbow Map. However, the U.K.s approach towards sexual minorities hasn't always been this commendable. Homosexuality was often treated as an illness by doctors and psychiatrists, who believed they could 'heal' such people with their treatments. Lesbian, gays, bisexuals, and transgenders often hid their identities in trepidation of being harassed and abused. They also faced a sentence to life imprisonment if they broke any of the homosexuality laws in place. It was only in 1981 when consensual sexual acts between adult males were decriminalized in all parts of the country, along with the concept of 'equal-age of consent' being introduced only at the beginning of the 21st Century. Under Margaret Thatcher's premiership, Section 28 of the Local Government Act 1988 was enacted which prohibited local authorities from '*promoting and publishing material with the intention of promoting homosexuality*' along with '*promoting the teaching in any maintained school of the acceptability of homosexuality as a pretended family relationship*'.⁹ This was only

⁸ Cynthia Lee, *The gay panic defense*, UC Davis L. Rev. 42, 471 (2008).

⁹ Kelly Kollman & Matthew Waites, *United Kingdom: Changing Political Opportunity Structures, Policy Success and Continuing Challenges for Lesbian, Gay and Bisexual Movements*, In Tremblay, M., Paternotte, D. & Johnson, C. (eds.) *The Lesbian and Gay Movement and the State: Comparative Insights into a Transformed Relationship*. Ashgate, Farnham, 181, 192-193(2011).

repealed in 2003, along with an apology issued by the former Prime Minister, David Cameron five years later.

The 2000s proved to be a breakthrough, whereby numerous legislations protecting gay rights were passed. The Civil Partnership Act, 2004 enabled, for the first time, same-sex couples to formalize their relationship.¹⁰ Trans persons could be legally recognized in their psychological gender due to The Gender Recognition Act, 2004.¹¹ There was an extension of adoption rights to same-sex couples via The Adoption and Children Act, 2002 and same-sex couples have progressively been granted parenting rights on a par with opposite-sex couples.¹² In 2010, The Equality Act, 2010 was introduced which prohibits discrimination on, inter alia, the grounds of sexual orientation, and gender reassignment, in a number of areas such as employment. A duty is imposed on all public bodies via the Act to not only to prevent discrimination but to also advance equality of opportunity.¹³ Successively, marriage equality has also been achieved in the U.K., with England and Wales and Scotland opening marriage to same-sex couples in 2014, and Northern Ireland, eventually, following their lead this year.

On January 31, 2020, The United Kingdom left the European Union (Brexit) and is currently in a transition period which will continue until the end of the year. While this decision has had a consequential impact on various human right policies, a question concerning a lot of activists is how Brexit will impact the human rights and equality landscape for the LGBTQ community in the U.K. While the European Union has legislation to protect the LGBTQ rights, the advancements made by the U.K. prove to be greater as they have gone beyond the EU Law in order to protect sexual minorities. Hence, the chances of any direct or even negative impact on the LGBTQ community in the U.K. seem improbable. However, there are a few aspects that will impact the U.K. due to Brexit, the first being a loss of the right which LGBTQ persons and British Nationals have benefited from as Union citizens under the EU law.¹⁴ As per the Coman Ruling, same-sex couples were permitted in all member states despite whether they recognized same-sex marriages or not. Due to Brexit, this privilege will cease to exist.¹⁵ In addition to this, LGBTQ persons who are now residents in the U.K will no longer be able to

¹⁰ Nicolas Bamforth, *The Benefits of Marriage in All but Name-Same-Sex Couples and the Civil Partnership Act 2004*, Child & Fam. L. Q 19,133, (2007).

¹¹ A.N. Sharpe, *A critique of the Gender Recognition Act 2004*, Journal of Bioethical Inquiry, 4(1), 33, (2007).

¹² Caroline Ball, *The Adoption and Children Act 2002: A critical examination*, Adoption & Fostering 29(2), 6, (2005).

¹³ John Wadham, *Blackstone's guide to the Equality Act 2010*, Oxford University Press, USA, (2010).

¹⁴ Peter Dunne, *Brexit: The Likely Impact on Sexual Orientation and Gender Identity Rights in the United Kingdom*, In Gender and Queer Perspectives on Brexit, Palgrave Macmillan, Cham, 273, (2019).

¹⁵ K Boele Woelki, *The Legal Recognition of Same-Sex Relationships Within the European Union*, Tulane Law Review 80, 1949, (2008).

benefit from the EU Soft Law instruments, i.e. The EU Roadmap Against Homophobia and Discrimination on The Grounds of Sexual Orientation and Gender Identity, and The European Commission's List of Actions to Advance LGBTI Equality, are no longer applicable to the UK. The United Kingdom will also cease to be a part of any surveys conducted by EU's Fundamental Rights Agency and other EU Bodies, and U.K. NGOs and institutions will not be able to apply for EU funding's or work with other EU NGOs to promote any causes such as equality for the LGBTQ community. One can only hope they use this transition period with utmost efficacy and strive towards the protection of the LGBTQ community despite the lack of guidance from the EU.

IV. CANADA

Regarded as one of the most-gay friendly countries, LGBTQ rights in Canada are one of the most advanced in the world. Right from 1969 till today, Canada has shown unceasing advancements in its LGBTQ legislation and policies.¹⁶

Following Prime Minister Pierre Trudeau's leading statement that "*There is no place for the State in the bedrooms of the nation*", The Criminal Code (also known as Bill C-150) was amended, legalizing same-sex sexual activity in Canada in 1969.¹⁷ Homosexuals were permitted to immigrate to Canada after the Immigration Act was repealed, and the Canadian Charter of Rights and Freedoms was adopted in the Constitution. The Charter guaranteed equality and provided LGBTQ individuals with mechanisms to challenge any discriminatory law in 1985. As a result of the court challenge, in the case of *Douglas v. Canada*, the ban imposed on lesbians, gays, and bisexuals serving in the military was lifted.¹⁸ Action was taking with respect to the ongoing hate crimes towards such sexual minorities by imposing stricter penalties. *Egan v. Canada*, a landmark Supreme Court case established that sexual orientation constitutes a prohibited basis of discrimination under Section 15 of the *Canadian Charter of Rights and Freedoms*.¹⁹ Soon after, the Parliament passed Bill C-23 which granted same-sex couples the same social and tax benefits as heterosexuals in common-law relationships.

The enactment of the Civil Marriage Act in 2005 marked a milestone in sexual orientation equality rights, by authorizing same-sex couples to be married anywhere in Canada.²⁰ Anti-

¹⁶ John Fisher & Kristie McComb, *Outlaws & In-laws: Your guide to LGBT rights, same-sex relationships, and Canadian law*, Egale Canada, (2004).

¹⁷ Stuart Chambers, *Pierre Elliott Trudeau, and Bill C-150: A rational approach to homosexual acts, 1968-69*, Journal of Homosexuality, 57(2), 249, (2010).

¹⁸ Boston Globe, *Canadian armed forces lift the ban on homosexuals in the military*, The Baltimore Sun, October 28, 1992. <https://www.baltimoresun.com/news/bs-xpm-1992-10-28-1992302127-story.html>.

¹⁹ *Egan v. Canada*, 2 SCR 513 (1995).

²⁰ Heather Macintosh, Elke D. Reissing & Heather Andruff, *Same-sex marriage in Canada: The impact of legal*

bullying legislations were passed in many provinces, and the federal government passed Bill C-16 which amended the Canadian Human Rights Act to include gender identity and gender expression as prohibited grounds of discrimination in recent times.²¹ Adding to the list of Canada's unending advancements, this year, the Canadian federal government has introduced a legislation to criminalize LGBTQ conversion therapy. The proposed amendments to the Canadian Criminal Code seek to include advertising, profiting from, and forcing individuals to undergo conversion therapy as offenses. The proposed Bill also authorizes Courts to dispose of any advertisements and promotions with respect to the same.²² This country serves as a role model to those around the world, paving the pathway with their exemplary decisions for LGBTQ equality globally.

V. INDIA

Article 1 of the Universal Declaration of Human Rights (“the Declaration”) *inter alia*, provides, “*All human beings are born free and equal in dignity and rights.*” Article 6 of the Declaration read along with Article 16 of the International Covenant on Civil and Political Rights (“the Covenant”) confer on every individual, a right of recognition as a person before the law. Further, Article 17 of the Covenant, *inter alia*, provides, “*No one shall be subjected to arbitrary or unlawful interference with his privacy, family, home or correspondence, nor to unlawful attacks on his honour and reputation.*” The Yogyakarta Principles were formulated after a meeting with various human rights experts in Yogyakarta, Indonesia in the year 2006.²³ These principles recognize the right to universal enjoyment of human rights; rights to equality and non-discrimination; right to recognition before law; right to life; right to security of person; right to privacy; etc. to everyone, regardless of sexual orientation and gender identity and prescribed the role to be played by respective State/ State authorities to ensure a guarantee of such rights. In November 2017, these principles were updated by the adoption of “*Additional Principles and State Obligations on the Application of International Human Rights Law in relation to Sexual Orientation, Gender Identity, Gender Expression,*

marriage on the first cohort of gay and lesbian Canadians to wed, The Canadian Journal of Human Sexuality, Vol. 19(3), 79, (2010).

²¹ Brenda Cossman & Ido Katri, *Today, trans-Canadians celebrate Bill C16. Tomorrow, the work begins for us all*, The Globe and Mail, June 15, 2017.

https://www.academia.edu/download/53559431/Today__trans_Canadians_celebrate_Bill_C-16.pdf.

²² Reuters in Toronto, Canada moves to criminalize LGBTQ+ 'conversion therapy', The Guardian, March 9, 2020, 21:55 GMT. <https://www.theguardian.com/world/2020/mar/09/canada-lgbtq-conversion-therapy-criminalize>.

²³ David Brown, *Making room for sexual orientation and gender identity in international human rights law: An introduction to the Yogyakarta Principles*, Mich. J. Int'l L., 31, p.821(2009).

and sex characteristics to complement the Yogyakarta Principles".²⁴ Accordingly, additional rights and obligations, *inter alia*, in relation to State protection; legal recognition; right to sanitation; right to protection from poverty, etc. have also been prescribed.

The Indian Constitution mandates justice and provides for and protects all sections of society. Articles 14 and 21 of the Constitution guarantees the right to equality before law²⁵ and equal protection under the law²⁶. Articles 15 and 16 of the Constitution further prohibit discrimination, *inter alia*, on the ground of sex.²⁷ Art has also been a medium to portray the idea of homosexuality along with the inner lives of gay people in India. An ancient Hindu scripture, the Rigveda contains the phrase "*Vikriti Evam Prakriti*" which translates to "*What seems unnatural is also natural*" - which some scholars associate with homosexuality. Despite this, under British Rule India became puritanical on sexual matters. While the choice of "coming out" has been rampant in India only since the 1990s, poets, and writers such as Firaq Gorakhpuri, used their literary work to express their homosexuality. In 1942, acclaimed novelist Ismat Chughtai's Urdu short story titled *Lihaaf*, raised eyebrows and a lawsuit for featuring a homosexual character. While homosexuality remained a criminal offense even after independence, decades later, in 1992, the first protect for gay rights was held. Soon after the "Calcutta Rainbow Parade" took place, India's first gay pride parade.

With reference to the legal status of homosexuality at the time, Section 377 of the Indian Penal Code (1860) relates to Unnatural Offences and included homosexuality within its domain. Our country adopted this law from the British penal code dating to the 19th century. In 2009, a landmark decision by the Delhi High Court in the case of *Naz Foundation v. Govt. of NCT of Delhi* held that treating consensual homosexual sex between adults as a crime is a violation of fundamental rights under the Indian Constitution.²⁸ While gay activists thought their battle against Section 377 was coming to end, less than five years later, this judgment was overturned. In the case of *Suresh Kumar Koushal and another v. NAZ Foundation and others*, the Supreme Court reinstated Section 377 of the IPC.²⁹

While the country was filled with an air of despondency and the LGBTQ community was on the brink of giving up, the Supreme Court in *NALSA vs Union of India* held that the rights and freedoms of transgender people in India were protected under the Constitution.³⁰ This case

²⁴ *id.*

²⁵ INDIA CONST, art. 14.

²⁶ INDIA CONST, art 21.

²⁷ INDIA CONST, art 15 & art 16.

²⁸ *Naz Foundation v. Government of NCT of New Delhi and Others*, WP(C) No. 7455/2001.

²⁹ *Suresh Kumar Koushal and another v NAZ Foundation and others*, Civil Appeal No. 10972 of 2013.

³⁰ *NALSA v Union of India*, (2014) 5 SCC 438.

made India the first nation to legally identify the LGBTQ community's rights and also granted them the status of a 'Third Gender' citizen of India. Soon after, in a judicial review, the Supreme Court in 2018, held Section 377 as unconstitutional, thus decriminalizing consensual same-sex relationships. While this was a welcome victory, reversing the relic of the British Imperial Rule, the LGBTQ battle in India for equal rights is still ongoing.

The recent Transgender Persons' (Protection of Rights) Bill, 2019 aimed to provide proper legislative protection to the LGBTQ community, once passed, it was met with a lot of criticism based on numerous factors. The said Act of 2019, is the first statutory enactment meant for the amelioration of the conditions of the transgender community. While not one person from the transgender community was approached during the process of drafting and passing of the Bill, causing stereotypes to be the driving force behind what was lacking for the community, numerous aspects appeared as if they were discriminatory and not well reasoned. To elaborate, as per the Bill in order for transgenders to change their gender on any government-issued identity card, they have to undergo sex-reassignment surgery, which is not only a procedure more than half the community can't afford but also accounts for a violation of privacy. Other aspects include discriminatory provisions in the Act based on sexual abuse for transgenders and cis-genders, no provisions for reservations, a factor which would prove to be extremely beneficial as most of the transgenders come from economically disadvantaged backgrounds and face difficulty securing jobs or admission. While the Act provides provisions based on health and educational aspects, there is a lack of clarity with respect to government aid for the same. The definition of "transgenders" too, provided under Section 2(k) of the Act has been criticized as non-exhaustive. The dominating aspect, however, is there is no mention of marriage, inheritance, adoption provisions, or even social security thus depriving the LGBTQ community of some of their fundamental rights. While this Bill was much awaited in the country, it has caused activists to question if their battle over the years was ineffective and if India has made any progress at all.

VI. CONCLUSION

It is evident that all the above countries have taken the first step which is recognizing the existing discrimination and a lack of legislation to protect members of the LGBTQ community. Even though this community in each country has had to overcome different histories of inequality and prejudice, the end goal of the community in all countries is largely similar. They only hope for equal treatment before the law and in society, and to possess all rights that any other human is endowed with, for which they have been fighting through

decades for.

The situation today involves a lot more awareness along with a pertinent increase in the voices ready to question this inequality and take action against it collectively. At the same time, the Trump Administration's decision to alter health care laws, and the waves of dissatisfaction present in India after the Transgender Persons' (Protection of Rights) Bill, 2019 was passed, only proves the community's battle is still ongoing and there is a long way ahead. Despite the awareness present today, the questions that come to my mind are - How can we become more inclusive and tolerant as a society? What steps should we be taking to put the community's battle to an eternal end? Where along the way did we go wrong?

In my opinion, there are a few ways whereby we can collectively adopt a "right approach" towards the ongoing situation. The biggest problem at hand is unlearning the century-old stereotypes towards this community. I believe the best way to go about the same is through education. Not only for Generation X but also the upcoming generations today. This can be done by including curriculums in schools on "Gender and Sexuality" so that the youth gets a clearer picture and the chances of misunderstandings and being ignorant are significantly reduced. Apart from the youth, one of the biggest contributors to this cause are the teachers present today, as it is through them, we get most of our knowledge. Hence, there should be education for the educators as well, in order to address any ignorance they have, and abolish any misunderstandings present in their minds as well.

Secondly, we as a society need to work towards a "constructive approach" for the community. I believe basic factors such as provisions for reservations for jobs and in the educational system need to be present for them. Provisions to grant them inheritance rights and adoption rights as well are not present in our country either. Recently, the U.S. Supreme Court ruled that employers who fire their workers for being gay or transgender are breaking the country's civil laws. This is the first time the Court spoke directly about legal protection for transgender individuals. Other Courts around the world need to continue or begin voicing their opinion and stance towards this community as well, which will serve not only as inspiration to others, leading to a greater impact but also strongly establish certain basic provisions for the community.

In today's environment, there are multifarious ways to show our support, however, ultimately everything begins at home. Be it our family, friends, or even co-workers, one can start by trying to change their opinion if it's based on misunderstandings and lack of awareness. I've witnessed there is a lot more support present for the community online as well, as compared

to before. One can always volunteer, form groups to talk to the community in order to attain their perspective and understand what they feel they're lacking primarily, write about the struggles faced by them, as the on-going pandemic has clearly proved technology has its advantages now, more than ever. Apart from the above-mentioned options, the key is ACTION oriented projects. Setting a target and working towards attaining the same, collectively, is what I believe will help the situation today. Be it protesting against the reservation policies which are not present in India, or lack of adoption and inheritance rights in our country today, our goals should be coupled equally with action.

Even though we are far from an ideal utopian situation, the 21st century has been the start of many movements to include and integrate people of all genders and sexual orientation into one society. Even though some countries have abolished archaic laws regarding homosexuality the fight for equality is long and laborious. A country like India, rich in a mythology which glorifies transgenders and romanticizes same-sex relationships has caused waves of dismay yet again, after the passing of the Transgender Persons (Protection of Rights) Bill, 2019. I believe that only time can truly test its efficiency and effectiveness, along with implementation and judicial interpretation. This Act, however, marks the first step towards the enduring struggle being faced by the community. While our country has a long way to go, the ultimate key is prioritizing progress, where we as a society grow equally, and not at the cost of subjugation of one over another.

In my opinion, the first step towards this global fight and the long road ahead is compassion, recognition, and acceptance for this community, worldwide. As Barbara Gittings, an activist fighting for the LGBTQ community once stated, "*Equality means more than passing laws. The struggle is really won in the hearts and minds of the community, where it really counts.*" With adequate and substantial legislation and education of members of society, the crusade taken up by the LGBTQ community will get less difficult and gain more traction. While many members of the community are slowly entering the legislating bodies in countries, I believe and hope the future of the LGBTQ community to be bright and successful.
