



## RIGHT TO HOUSING OF TRANSGENDER PERSONS, STILL AN EQUALITY CONCERN IN THE STATE OF WEST BENGAL

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Transgender activism in India achieved its legal recognition after the landmark ‘NALSA’ judgment delivered by the Apex court.<sup>1</sup> The fundamental freedom of choosing one’s gender identity and the resultant fundamental rights denied for long to the members of this community under Art 14, 15, 16, 19 & 21 was now made ‘gender-neutral.’<sup>2</sup> The same further received an impetus with the decriminalization of sec 377<sup>3</sup> and with the introduction of the Transgender Persons (Protection of Rights) Act, 2019 (Trans Act, 2019).<sup>4</sup> NALSA gave guidelines on the social inclusion of these communities in all walks of life and both the state and central government were asked to play proactive roles in achieving the same. The directives ranged from providing them access to quality livelihood to considering them socially and educationally (SEB) backward classes citizens, to receive benefits under various government schemes. While

many states have effectively implemented the NALSA directives, many like Mizoram, Madhya Pradesh, and Tripura are still lagging.<sup>5</sup> The state of West Bengal in this regard was the third state in India, to set up a transgender welfare Board.<sup>6</sup> While Bengal has proactively formulated a ‘board’, yet policy reforms in crucial arenas of providing access to ‘quality livelihood’ with ‘housing’ being the most important tenant is missing. The focus of this paper will thus be on analyzing the initiatives of the state government of West Bengal, in providing basic ‘housing facilities’ to the Transgender (Trans) population of the state and the extent to which reforms are necessary.

### Right to Housing of Transgender Persons

Affordable Housing is one of the most basic tenants of ‘quality livelihood’.<sup>7</sup> The same is a facet protected under Art 21 and 19 (1) (e) of the constitution of India.<sup>8</sup> It is not mere animal existence but a ‘right to reasonable accommodation’.<sup>9</sup> Concerning recognition of this right of the Transgender Community (Trans Community), The Transgender Persons (Protection of Rights) Act, 2019<sup>10</sup> is the first legislative step towards recognizing

<sup>1</sup> National Legal Services Authority v. Union of India and Others, [2014] 3 MLJ 595

<sup>2</sup> *Id.*

<sup>3</sup> Navtej Singh Johar v. Union of India, (2018) 10 SCC 1

<sup>4</sup> The Transgender Persons (Protection of Rights) Act, 2019, No. 40, Acts of Parliament, 2019 (India)

<sup>5</sup> Dipika Jain et al., *Bureaucratization of Transgender Rights: Perspective from the Ground*, 14 Socio-Leg. Rev. 99, 141-142 (2018)

<sup>6</sup> Shiv Sahay Singh, *Bengal to set up Transgender Welfare Board*, THE HINDU, (Jul 16, 2014), <https://www.thehindu.com/news/cities/kolkata/bengal>

-to-set-up-transgender-welfare-board/article6216502.ece (last visited Aug 27, 2021).

<sup>7</sup> *Id. at 1.*

<sup>8</sup> U P Avas Evam Vikas Parishad & Another Versus Friends Coop Housing Society Ltd & Another, LNIND 1995 Sc 566 ; see Francis Coralie v. Union Territory of Delhi AIR 1981 SC 746, LNIND 1981 SC 27

<sup>9</sup> M/s Shantistar Builders v. Narayan Khimalal T, AIR 1990 SC 630

<sup>10</sup> The Transgender Persons (Protection of Rights) Act, 2019, No. 40, Acts of Parliament, 2019 (India)



the same. Section 3 (g)<sup>11</sup> and sec 12<sup>12</sup> prohibits any form of discrimination and upholds the right of residence and sec 18 (c)<sup>13</sup> prescribes penalties in violation of these provisions with imprisonment for a term not less than six months extendable up to two years with a fine.<sup>14</sup>

#### Minoritization and Stigma the cause behind “Housing Discrimination”

The legal recognition of the Trans community is indeed a great leap forward in acknowledging their rights. However, in terms of social recognition challenges are yet to be mitigated. As per the report of the National Human Rights Commission, 2017 only two percent of the transgender population lives with their parents.<sup>15</sup> The data is glaring in terms of the suffering this community suffers at the instance of their family members. Adding to this is the lack of social acceptance due to their difference in bodily attributes and their inability to reproduce. They are termed as ‘Hijra’ which is often used in an abusive sense.<sup>16</sup> However, the only instance of ‘respect’ accorded to them is that their blessings are considered holy in any event of life.

The ‘social stigma’ attached to the gender identity of this community prevents them from having access to the bare minimum

facilities necessary for a sustainable livelihood. As a resultant effect, the most common form of discrimination suffered is Housing discrimination.<sup>17</sup> They often then, live in crowded slum areas with a fear of frequent eviction, in places referred to as ‘Grahamas’ under the guidance of their ‘Hijra Guru’ and ‘Chelas’ (subordinates).<sup>18</sup>

#### Inclusion of Transgender Persons in the welfare policies of the State

Seven years after NALSA, very little has been achieved in terms of inclusion of the Trans community in the welfare policies both at the central and state level. There is no National Policy on transgender persons yet, neither is there any reservation for the community declared, despite specific NALSA directives.<sup>19</sup> However recently, The Ministry of Social Justice and Empowerment, under its Social Defence arena have formulated welcome initiatives, which indeed are reformative. Some of these<sup>20</sup> include:

- Setting up National Council for Transgender Persons on, 21<sup>st</sup> August 2020 for addressing grievances of Transgender persons.
- They were given Covid-19 subsistence allowance under the Ministry’s grant.

<sup>11</sup> The Transgender Persons (Protection of Rights) Act, 2019, § 3 (g), No. 40, Acts of Parliament, 2019 (India)

<sup>12</sup> The Transgender Persons (Protection of Rights) Act, 2019, § 12, No. 40, Acts of Parliament, 2019 (India)

<sup>13</sup> The Transgender Persons (Protection of Rights) Act, 2019, § 18 (c), No. 40, Acts of Parliament, 2019 (India)

<sup>14</sup> *Id.*

<sup>15</sup> NHRC., STUDY ON HUMAN RIGHTS OF TRANSGENDER AS A THIRD GENDER, 1-135, 1<sup>st</sup> Sess., at 104 (2017)

<sup>16</sup>Shamayeta Bhattacharya & Debarchana Ghosh, *Studying physical and mental health status among*

*hijra, kothi and transgender community in Kolkata, India*, 265 SOC. SCI. MED. 1–11 (2020).

<sup>17</sup>Sibsankar Mal, *The hijras of India: A marginal community with paradox sexual identity*, 34 Indian J Soc Psychiatry. 10, 1-79 (2018).

<sup>18</sup> Bhattacharya & Ghosh., *supra* note 16

<sup>19</sup> STUDY ON HUMAN RIGHTS OF TRANSGENDER AS A THIRD GENDER., *supra* note 15.

<sup>20</sup> MSJE., ANNUAL REPORT OF THE SOCIAL DEFENCE PROGRAM, 1-340, 1<sup>st</sup> Sess., at 138 (2020-2021)



- National Portal for Transgender Persons launched on 25<sup>th</sup> November 2020 for facilitating the process of obtaining a gender identity Certificate.

Apart from the aforementioned, for the first time, an exclusive ‘transgender’ centric housing initiative has been launched at the central level, known as the ‘Garima Grih’ scheme (shelter homes for Transgender persons). For the implementation of the same, 13 community-based organization has been selected to implement the scheme across various states. The first pilot was inaugurated in Gujarat.<sup>21</sup> The scheme has been implemented in West Bengal by an NGO.<sup>22</sup> Thus, at the central level, the long need for a housing scheme is in its implementation.

Concerning West Bengal, the 5<sup>th</sup> largest state in terms of the Transgender population,<sup>23</sup> it has shown progress in catering to the needs of its Transgender population. The third state in setting up a Transgender Welfare Board,<sup>24</sup>

effective in reserving seats for Transgenders in Buses,<sup>25</sup> constructing separate public toilets,<sup>26</sup> recommending recruitment of members of Trans community as the civic police volunteers,<sup>27</sup> dedicating beds in state-run hospitals,<sup>28</sup> facilitating the Sex Reassignment Surgery (SRS)<sup>29</sup> and further having India’s first Transgender college principle from West Bengal. While these reforms are applauding, in terms of necessities such as housing, the schemes are absent in place.

#### State’s Failure in fulfilling its Fundamental Duties

The notion and standards of equality are based on principles of non-discrimination and reasonable classification. Both standalone in their implementation will not amount to equitable treatment. Thus, “Equality not only implies preventing discrimination but goes beyond in remedying discrimination against groups suffering systematic discrimination in society.”<sup>30</sup> Henceforth, the negative language of Art 21

<sup>21</sup> Sumit Arora, *GoI to set up Garima Grihas for transgender persons to provide safe shelter*, ADDA247 (Jul 29, 2021), <https://currentaffairs.adda247.com/goi-to-set-up-garima-grihas-for-transgender-persons-to-provide-safe-shelter/> (last visited Aug 27, 2021).

<sup>22</sup> *The hijras of India: A marginal community with paradox sexual identity*, *supra* note 17.

<sup>23</sup> Chaitali Mandal et al., ‘Other’ gender in India: An Analysis of 2011 Census Data, SocArXiv (Jun.2, 2020), [osf.io/preprints/socarxiv/j48qy](https://osf.io/preprints/socarxiv/j48qy)

<sup>24</sup> Singh., *supra* note 6.

<sup>25</sup> PTI, *Reserved seats for transgenders in Bengal buses*, THE HINDU, (Aug 17, 2020, 11:34 IST), <https://www.thehindu.com/news/cities/kolkata/reserved-seats-for-transgenders-in-bengal-buses/article32372112.ece> (last visited Aug 27, 2021).

<sup>26</sup> Sonam Joshi, *Indian state asks colleges to build separate toilets for transgender students*, MASHABLE (Jul 8, 2016), <https://mashable.com/article/west-bengal-colleges-transgender-toilets> (last visited Aug 27, 2021).

<sup>27</sup> Aniruddha Ghosal, *West Bengal govt plans to enroll transgenders in civic police volunteer force*, THE INDIAN EXPRESS (Oct 1, 2015, 9:07 AM), <https://indianexpress.com/article/cities/kolkata/kolkata-a-govt-mulls-to-enroll-transgenders-in-civic-police-volunteer-force/> (last visited Aug 27, 2021).

<sup>28</sup> Shamayita Chakraborty, *Amid COVID-19 crisis, beds for transgenders allotted at Bangur*, THE TIMES OF INDIA, (April 26, 2020, 21:00 IST), <https://timesofindia.indiatimes.com/city/kolkata/amid-covid-19-crisis-beds-for-transgenders-allotted-at-bangur/articleshow/75393791.cms> (last visited Aug 27, 2021).

<sup>29</sup> TNN, *Sex-change surgery in govt hospitals soon*, THE TIMES OF INDIA, (July 11, 2015, 6:26 IST), <https://timesofindia.indiatimes.com/city/kolkata/sex-change-surgery-in-govt-hospitals-soon/articleshow/48027540.cms> (last visited Aug 27, 2021).

<sup>30</sup> National Legal Services Authority v. Union of India and Others, [2014] 3 MLJ 595



not only prevents the ‘State’ from interfering with the personal liberty of individuals but also casts a “positive obligation upon the State to take steps for ensuring a better enjoyment of his life and dignity.”<sup>31</sup>

Housing being one of the crucial needs for a sustainable livelihood, the State government is obligated to provide the same. The West Bengal government has been quite proactive since the past few years in implementing such welfare-centric housing schemes, which include schemes like, ‘Geetanjali & Amar Thikana’(Now merged under one name ‘Geetanjali’),<sup>32</sup> ‘Nijo Griha Nijo Bhumi’,<sup>33</sup> ‘Snehalaya’,<sup>34</sup> ‘Nijashree’,<sup>35</sup> ‘Chaa Sundari Housing Scheme’<sup>36</sup> and ‘Bangla Awas Yojana’<sup>37</sup>. However, whether such schemes have addressed the ‘housing needs’ of its Trans community? The answer to the same is unaddressed as no data is available in the public domain as to the actual class of beneficiaries under the scheme.

Further, some existing lacunas in the implementation of the scheme can be identified as one of the reasons why transgender beneficiaries may not be able to access the benefits of these schemes. ‘Geetanjali’ scheme introduced in 2011, whose objective specifies its intention to provide fully subsidized residential houses not only to the ‘economically weaker sections but also to the ‘Minority communities’.<sup>38</sup> Six departments including the Backward classes welfare Department (BCWD) are collaborating in its implementation,<sup>39</sup> however, the West Bengal Transgender Development Board’s (WBTDB) involvement in such minority specific housing scheme is absent. Although BCWD is also a part of the State coordination committee of the WBTWB, no ‘Trans community-specific implementation Plan’ is in deliberation. Thus, although the Board for Transgender Welfare is established, and its state coordination committees are ranging from various departments, but it is not inclusive of the representatives from the

<sup>31</sup> Vincent Panikurlangara v. Union of India, (1987)2 S.C.C. 165

<sup>32</sup> Geetanjali - Egiye Bangla, WEST BENGAL STATE PORTAL, (May 1, 2021), <https://wb.gov.in/government-schemes-details-geetanjali.aspx> (last visited Aug 28, 2021).

<sup>33</sup> Nijogriha - Egiye Bangla, WEST BENGAL STATE PORTAL, (May 1, 2021), <https://wb.gov.in/government-schemes-details-nijogriha.aspx> (last visited Aug 29, 2021).

<sup>34</sup> Subhro Maitra, *After ‘Banglar Abas Yojana’, Didi unveils ‘Snehalaya’ housing plan*, THE TIMES OF INDIA, (March 4, 2020, 6:00 IST), <https://timesofindia.indiatimes.com/city/kolkata/after-banglar-abas-yojana-didi-unveils-snehalaya-housing-plan/articleshow/74466785.cms> (last visited Aug 28, 2021).

<sup>35</sup> Karan Chhabra, *WB Nijashree Housing Scheme Apply Online Form 2021 at wbhousing.gov.in, SARKARIYOJANA.COM*, (May 8, 2021), <https://sarkariyojana.com/wb-nijashree-housing->

[scheme-online-application-form-wbhousing/](https://wbhousing.gov.in/scheme-online-application-form-wbhousing/) (last visited Aug 29, 2021).

<sup>36</sup> Admin, *WB Chaa Sundari Scheme 2021: Housing Scheme for Tea Workers, Apply Online*, INDIA SCHEME (Jul 22, 2021), <https://indiascheme.com/chaa-sundari-scheme/> (last visited Aug 29, 2021).

<sup>37</sup> Express News Service, *Bangla Awas Yojana: CM Mamata Banerjee inaugurates scheme to help fund ‘5 lakh houses’ in rural areas*, THE INDIAN EXPRESS, (Jan 30, 2018, 8:43 Am) <https://indianexpress.com/article/cities/kolkata/bangla-awas-yojana-cm-mamata-banerjee-inaugurates-scheme-to-help-fund-5-lakh-houses-in-rural-areas-5044439/> (last visited Aug 28, 2021).

<sup>38</sup> Geetanjali - Egiye Bangla, WEST BENGAL STATE PORTAL, (May 1, 2021), <https://wb.gov.in/government-schemes-details-geetanjali.aspx> (last visited Aug 28, 2021).

<sup>39</sup> *Id*



housing department. Further, schemes like ‘Nijo-Griha Nijo-Bhumi’, is implemented to provide ‘five’ decimals of land to all “landless and homestead less’ agricultural laborers, fisherman, village artisans, and marginal people from different self-help groups.<sup>40</sup> However, there is no Self-help group of Transgender people in West Bengal. Neither the state government has taken any initiatives to promote the same. Unlike the situation is in Tamil Nadu<sup>41</sup> and Bihar<sup>42</sup>, where the government provides ‘Seed money’ to these Transgender Self-Help Groups to grow. Thus, they are denied benefits of these schemes despite being the rightful stakeholders. Thereafter, with schemes like ‘Bangla Awas Yajona’ & ‘Senahalaya’, while the prospects are promising and under the later 25,000 beneficiaries<sup>43</sup> have been identified and the implementation is in process, many Transgenders may not be benefitted due to lack of fixed monthly income or documentation like the bank account details, which is the quintessential requirement for available these schemes.<sup>44</sup> Further, most schemes are implemented on ‘beneficiary owned land’ and many within the community

have no connection with their families to own any property.

Henceforth from the perusal of the aforementioned, it is evident, that it becomes difficult for the ‘Trans community’ to avail benefits of the general housing schemes due to their difference in ‘status quo’ as compared to the general marginalized population of the state. Thus, a Transgender centric housing scheme properly channelized on the understanding of their problems and availabilities is the need of the hour. While several such ‘community specific’ housing schemes like ‘Chaa Sundari Housing Scheme’ addressing the Tea Garden workers,<sup>45</sup> Shelter homes for elderly persons,<sup>46</sup> ‘Night Shelter for patient parties’, ‘Pathasathi’ for women travelers, are in place, why the state government is overlooking the need for such community-specific housing scheme for transgender persons, is not known.

#### Why are the Present Laws failing to prevent ‘Housing discrimination’?

<sup>40</sup> Nijogriha - Egiye Bangla, WEST BENGAL STATE PORTAL, (May 1, 2021), <https://wb.gov.in/government-schemes-details-nijogriha.aspx> (last visited Aug 29, 2021).

<sup>41</sup> Staff Reporter, *SHG for transgenders formed*, THE HINDU, (December 22, 2017, 22: 32 PM), <https://www.thehindu.com/news/national/tamil-nadu/shg-for-transgenders-formed/article22261456.ece> (last visited Aug 29, 2021).

<sup>42</sup> Reena Sopam, *Bihar govt to facilitate self-help groups for transgender persons*, HINDUSTAN TIMES, (Jul 23, 2021, 6:24 PM), <https://www.hindustantimes.com/cities/patna-news/bihar-govt-to-facilitate-self-help-groups-for-transgender-persons-101627044847739.html> (last visited Aug 29, 2021).

<sup>43</sup> *After ‘Banglar Abas Yojana’, Didi unveils ‘Snehalaya’ housing plan*, supra note 34.

<sup>44</sup> Shreya Raman, *Transgenders can’t get state benefits as most official data ignores “other,”* BUSINESS STANDARD INDIA, (June 11, 2021, 8:53 IST), [https://www.business-standard.com/article/economy-policy/denied-visibility-in-official-data-transgenders-can-t-access-benefits-121061100148\\_1.html](https://www.business-standard.com/article/economy-policy/denied-visibility-in-official-data-transgenders-can-t-access-benefits-121061100148_1.html) (last visited Aug 28, 2021).

<sup>45</sup> *WB Chaa Sundari Scheme 2021: Housing Scheme for Tea Workers*, Apply Online, supra note 36.

<sup>46</sup> Mohan Chandra Dolai, *Housing for the Aged: Old-age Homes in Rural West Bengal*, ECONOMIC & POLITICAL WEEKLY, (Aug 22, 2015), <https://www.epw.in/journal/2015/34/reports-states-web-exclusives/housing-aged.html> (last visited Aug 29, 2021).



The Transgender Persons (Protection of Rights) Act, 2019 was a much-needed legislative reform for the community. However, the stakeholders are themselves not satisfied with the law.<sup>47</sup> Right to Residence is protected under sec 12 even against family members, however, no corresponding penalty is provided under the section in case of violation.<sup>48</sup> Henceforth, in such cases, they have to seek the remedy under sec 317 of the Indian Penal Code. Sec 18 provides for penalties for offenses. However, the trans community has criticized the said 'quantum of penalties and imprisonment' as being disproportionate with the offense when compared to the penalties of their Binary gender.<sup>49</sup>

As per a study conducted by the Ministry of Women and Child development as of September 2018, out of 370,227 in need of Care and Protection across 9589 Child Care Homes (CCI) homes covered under the study, 92 are transgender children.<sup>50</sup> There are a total of 327 CCI homes in West Bengal, out

of which none of them have Trans children (TGC) in them as compared to other states like Telangana (36 TGC), Karnataka (16), Andhra Pradesh (15), and Maharashtra (14).<sup>51</sup> This can be due to the lacuna in the WB JJ Rules, 2017 which still operates on the binary male and Female,<sup>52</sup> strictly violating the NALSA mandate of recognition of the identity of Hijras/Transgenders in the various legislations.<sup>53</sup> Thus, trans children are left with no option of rehabilitation which is much needed for their mental wellbeing and social inclusion. Further NGOs are finding it difficult to implement the 'Garima Grih' scheme due to prevalent housing discrimination and thus this needs urgent government attention.<sup>54</sup>

Harassment in terms of non-registration of cases at the hands of Police officials is not new for this community.<sup>55</sup> Concerning WB incidents like 'Ranjita Sinha leading Transgender activist and a former member of the WBTDB, been harassed by a policeman,<sup>56</sup> murder of Transgender in

<sup>47</sup> Utkarsh Kumar, *Why transgender community considers trans persons Act negation of gender justice*, COUNTERVIEW, (Dec 14, 2020), <https://www.counterview.net/2020/12/why-transgender-community-considers.html> (last visited Aug 28, 2021).

<sup>48</sup> Aastha Khanna & Divesh Sawhney, *Legislative Review of the Transgender Persons (Protection of Rights) Act, 2019*, 24 HUM. RTS. BRIEF 155 (2020).

<sup>49</sup> *WB Chaa Sundari Scheme 2021: Housing Scheme for Tea Workers*, *Apply Online*, *supra* note 36.

<sup>50</sup> MWCD, *The REPORT OF THE COMMITTEE For Analysing Data of Mapping and Review Exercise of Child Care Institutions under the Juvenile Justice (Care & protection of Children) Act, 2015 and Other Homes Volume-I*, 1-250, 1<sup>st</sup> Sess., at 33 (2018)

<sup>51</sup> MWCD, *The REPORT OF THE COMMITTEE For Analysing Data of Mapping and Review Exercise of Child Care Institutions under the Juvenile Justice (Care & protection of Children) Act, 2015 and Other Homes Volume-I*, 1-250, 1<sup>st</sup> Sess., at 77 (2018)

<sup>52</sup> Namrata Mukherjee, *Which way home for transgender minors?* VARTA, (AUG 29, 2020), <https://vartagensex.org/insight/2020/08/which-way-home-for-transgender-minors/> (last visited Aug 29, 2021).

<sup>53</sup> *National Legal Services Authority v. Union of India and Others*, [2014] 3 MLJ 595

<sup>54</sup> Ajanta Chakraborty, *Many refusals later, finally a safe home for trans people*, THE TIMES OF INDIA, (Apr 24, 2021, 4:31 IST), <https://timesofindia.indiatimes.com/city/kolkata/many-refusals-later-finally-a-safe-home-for-trans-people/articleshow/82221970.cms> (last visited Aug 27, 2021).

<sup>55</sup> *India: Enforce Ruling Protecting Transgender People*, HUMAN RIGHTS WATCH (5 Feb, 2015), <https://www.hrw.org/news/2015/02/05/india-enforce-ruling-protecting-transgender-people> (last visited Aug 28, 2021).

<sup>56</sup> Puja Bhattacharjee, *Kolkata Trans Woman's Harassment by Cop Raises Questions on Whether*



Burdwan district of West Bengal,<sup>57</sup> is a proof of the existence of such brutality. Further, the Supreme Court's mandate of establishing a Police complaint committee (PCW) both at the state level and district level is yet not fulfilled in West Bengal.<sup>58</sup> Though at the state level it exists, however, it is non-compliant with the directives in terms of its independent composition.<sup>59</sup>

### The Way Forward

The Trans community of our country is long marginalized and despite 'NALSA', states like West Bengal, are yet to formulate Trans Community specific schemes in many arenas specially for housing. There is a need for amendment in the state laws to make legislation gender-neutral and schemes solely dedicated to their welfare. The greater proactiveness of WBTDB<sup>60</sup> will be beneficial in mitigating these challenges. Initiatives like 'Duare Sarker (government at doorstep)' of the state government is welcoming<sup>61</sup> and must be ensured to not be lost in bureaucratization.

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*Rules Are Enough*, THE WIRE (30<sup>th</sup> Sep,2020), <https://thewire.in/lgbtqia/kolkata-ranjita-sinha-transgender-woman-police-harassment> (last visited Aug 28, 2021).

<sup>57</sup> Prema Rajaram, *Protest held in West Bengal's Barrackpore over murder of transgender*, INDIA TODAY (2021), <https://www.indiatoday.in/india/story/protest-held-in-west-bengal-s-barrackpore-over-murder-of-transgender-1838219-2021-08-08> (last visited Aug 28, 2021).

<sup>58</sup> CHRI, GOVERNMENT COMPLIANCE WITH SUPREME COURT DIRECTIVES ON POLICE REFORMS: AN ASSEMENT, 1-41., at 29 (2020)

<sup>59</sup> CHRI, GOVERNMENT COMPLIANCE WITH SUPREME COURT DIRECTIVES ON POLICE REFORMS: AN ASSEMENT, 1-41., at 30 (2020)

<sup>60</sup> The Transgender Welfare Development Board, West Bengal – A Wasted Potential, CENTRE FOR LAW & POLICY RESEARCH (13<sup>th</sup> April, 2017), <https://clpr.org.in/blog/the-transgender-welfare-development-board-west-bengal-a-wasted-potential-2/> (last visited Aug 27, 2021).

<sup>61</sup> Snehamoy Chakraborty, *Govt at homes of transgenders*, The Telegraph Online (Aug 28, 2021, 3:58 AM), <https://www.telegraphindia.com/west-bengal/bengal-govt-at-homes-of-transgenders/cid/1800094> (last visited Aug 29, 2021).