



Legal Rights and Recognition of Transgender Lives in India

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ABSTRACT

The social history of transgender individuals in India is characterized by a rich heritage dating back to Ancient times, where they were recognized and respected. However, the British colonial period brought about a shift in attitudes, leading to discrimination and degradation, after enacted the Criminal Tribes Act, 1871. The criminalization of transgender individuals under colonial rule has lasting effects on their quality of life, persisting even after India's independence. Stigma and discrimination associated with "criminal tribes" continue to marginalize the transgender community. Explore the legal rights of transgender in India. The methodology used in this study is a mixed method by utilizing both qualitative and quantitative secondary sources to comprehensively address the research objective. The enactment of the Transgender Persons (Protection of Rights) Act in 2019 and subsequent rules introduced in 2020, makes a significant phase in the context of transgender history of struggle for equality and recognition. These legislative measures represent a formal acknowledgement of the rights of transgender persons, in line with the constitutional principles of equality and non-discrimination expressed in Articles 14, 15 and 21. However, this act faced many criticisms for its implementation and inherent limitations. The degree of acceptance and understanding in society will determine how effective these rules are, in addition to the actions taken. Though progressive in recognizing transgender rights, the Transgender



Persons (Protection of Rights) Act, 2019, and the rules of 2020 remain incomplete because of an incomplete practical application. To increase change, the shortcomings need to be addressed through vigorous implementation strategies, public sensitization, and an all-comprehensive legal protection which truly reflects the dignity and autonomy of all transgender persons.

Introduction

According to Ancient and Vedic literature the sex or gender of the human being is clearly divided into three separate categories according to nature or prakriti and they were acknowledged as a part of society: first one is *pums or purusha prakriti* or male, *stri-prakriti* or female, and *tritiya-prakriti* or third sex or gender (Wilhelm, 2003). People of the Third sex or gender are broken down into several categories, it generally referred to as Gay, Lesbians, Intersex and Transgender people. Gay and lesbian are basically homosexual. Gay refers to a man who sexually attracted to the same sex person. On the other hand; Lesbian refers to woman who sexually attracted to other woman. The term Intersex refers to that person who born with ambiguous genitalia (Wilhelm, 2003). They also known as Hermaphrodite. Basically they are homosexual, heterosexual, or sexually undefined by nature, and their degree of impotence can significantly differ.

Transgender the definition of the term is still under construction, but the term refer to people who move away from the gender they were assigned at birth, people who cross over the boundaries constructed by their culture to define and contain that gender (Stryker, 2017).

According to WHO (World Health Organization) “Transgender is an umbrella term for people whose gender identity and expression does not conform to the norms and expectations traditionally associated with the sex assigned to them at birth; it includes people who are transsexual, transgender or otherwise gender non-conforming.”

This community has a long history in Indian mythology. In ancient literature we saw that transgender enjoyed complete freedom and respect till British period. Since Britishers were come in 18th century, transgender’s situation has radically changed (NALSA vs. Union of India ors. 2014). Accounts of early European travelers showed that they were repulsed by the sight of Transgender and could not understand why they were given so much respect in the royal courts and other institutions. In the second half of the 19th century, the British colonial administration actively sought to criminalize this community and to



deny them the civil rights. Transgender were considered to be distinct caste or tribe in different parts of India by the colonial administration. Their social mores and gender roles were considered “deviant”. This was most evident in the enactment of the Criminal Tribes Act, 1871, which deemed the entire community of Transgender persons as innately “criminal” and “addicted to the systematic commission of non-bailable offences”.

The western concept of hating and marginalizing anybody who was not straight took hold in Indian society. The Transgender community was forced from a well-respected role as pillars of religious and governmental society to being social outcasts. This social exile is responsible for the socioeconomic and medical difficulties that transgender face. Transgenders are prone to being economically challenged because of the stigmas that they face. They are denied educational opportunities, jobs, and discriminated against in every area of their lives.

In the category of LGBTQ this paper attempts to focus only on “T” i.e., Transgender group of people.

Objective

This paper tries to explore the legal rights of transgender in India.

Research Methodology

The methodology used in this study is a mixed method by utilizing both qualitative and quantitative secondary sources to comprehensively address the research objective. Secondary sources, which include books, academic journals, newspaper, government reports and documents, census etc.

Population of Transgender

Indian Census has never recognized third gender i.e. Transgender while collecting census data for years. But in 2011, data of Transgender's were collected with details related to their employment, Literacy and Caste. In India, total population of transgender is around 4.88 Lakh as per 2011 census. The data of Transgender has been cubbed inside "Males" in the primary data released by Census Department. For educational purpose, separate data of Transgender has been curved out from that.

State-wise Population Share of Transgender People in India as per Census, 2011

| Sl. No. | State | Transgenders | Child (0-6) | Sc | St | Literacy |
|---------|-------|--------------|-------------|----|----|----------|
| | | | | | | |



| | India | 487,803 | 54,854 | 78,811 | 33,293 | 56.07% |
|----|-------------------|---------|--------|--------|--------|--------|
| 1 | Uttar Pradesh | 137,465 | 18,734 | 26,404 | 639 | 55.80% |
| 2 | Andhra Pradesh | 43,769 | 4,082 | 6,226 | 3,225 | 53.33% |
| 3 | Maharashtra | 40,891 | 4,101 | 4,691 | 3,225 | 67.57% |
| 4 | Bihar | 40,827 | 5,971 | 6,295 | 3,529 | 44.35% |
| 5 | West Bengal | 30,349 | 2,376 | 6,474 | 506 | 58.83% |
| 6 | Madhya Pradesh | 29,597 | 3,409 | 4,361 | 1,474 | 53.01% |
| 7 | Tamil Nadu | 22,364 | 1,289 | 4,203 | 5,260 | 57.78% |
| 8 | Orissa | 20,332 | 2,125 | 3,236 | 180 | 54.35% |
| 9 | Karnataka | 20,266 | 1,771 | 3,275 | 4,553 | 58.82% |
| 10 | Rajasthan | 16,517 | 2,012 | 2,961 | 1,324 | 48.34% |
| 11 | Jharkhand | 13,463 | 1,593 | 1,499 | 1,805 | 47.58% |
| 12 | Gujarat | 11,544 | 1,028 | 664 | 3,735 | 62.82% |
| 13 | Assam | 11,374 | 1,348 | 744 | 1,238 | 53.69% |
| 14 | Punjab | 10,243 | 813 | 3,055 | 1,223 | 59.75% |
| 15 | Haryana | 8,422 | 1,107 | 1,456 | 0 | 62.11% |
| 16 | Chhattisgarh | 6,591 | 706 | 742 | 0 | 51.35% |
| 17 | Uttarakhand | 4,555 | 512 | 731 | 1,963 | 62.65% |
| 18 | Delhi | 4,213 | 311 | 490 | 95 | 62.99% |
| 19 | Jammu and Kashmir | 4,137 | 487 | 207 | 0 | 49.29% |
| 20 | Kerala | 3,902 | 295 | 337 | 385 | 84.61% |
| 21 | Himachal Pradesh | 2,051 | 154 | 433 | 51 | 62.10% |
| 22 | Manipur | 1,343 | 177 | 40 | 118 | 67.50% |
| 23 | Tripura | 833 | 66 | 172 | 378 | 71.19% |
| 24 | Meghalaya | 627 | 134 | 3 | 181 | 57.40% |
| 25 | Arunachal Pradesh | 495 | 64 | 0 | 540 | 52.20% |
| 26 | Goa | 398 | 34 | 9 | 311 | 73.90% |
| 27 | Nagaland | 398 | 63 | 0 | 33 | 70.75% |
| 28 | Puducherry | 252 | 16 | 40 | 335 | 60.59% |
| 29 | Mizoram | 166 | 26 | 1 | 0 | 87.14% |
| 30 | Chandigarh | 142 | 16 | 22 | 146 | 72.22% |



| | | | | | | |
|----|-----------------------------|-----|----|---|----|--------|
| 31 | Sikkim | 126 | 14 | 9 | 37 | 75.18% |
| 32 | Daman and Diu | 59 | 10 | 1 | 2 | 75.51% |
| 33 | Andaman and Nicobar Islands | 47 | 5 | 0 | 3 | 73.81% |
| 34 | Dadra and Nagar Haveli | 43 | 5 | 0 | 22 | 73.68% |
| 35 | Lakshadweep | 2 | 0 | 0 | 2 | 50.00% |

Source: Census of India, 2011

According to the census of 2011, India has 4,87,803 people who identify themselves as the third gender. There are 54,854 transgender children (0–6 years) in this country, 78,811 from the scheduled caste (SC), and 33,293 from the scheduled tribe (ST).

The highest proportion of the third gender population, about 28%, was identified in Uttar Pradesh followed by 9% in Andhra Pradesh, 8% each in Maharashtra and Bihar, over 6% in both Madhya Pradesh and West Bengal and well over 4% in Tamil Nadu, Karnataka and Odisha. Rajasthan accounted for over 3% of the total transgender population and Punjab for 2%.

Constitution of India

Transgender individuals in India are afforded several legal protections under the Constitution, primarily through landmark judicial rulings and specific legislation aimed at safeguarding their rights. The Constitution of India incorporated a liberal-democratic framework and included three basic principles of social justice – liberty, equality and fraternity – in the Preamble. It provides basic guarantees like the Fundamental Rights.

Article 14

Article 14. Equality before law.—The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India. This article guarantees that every individual is equal before the law and prohibits discrimination. The Supreme Court has interpreted this to include transgender persons, affirming that they are entitled to legal recognition and protection.

Article 15

Article 15. Prohibition of discrimination on grounds of religion, race, caste, sex or place of birth.—(1) The State shall not discriminate against any citizen on grounds only of religion, race, caste, sex, place of birth or any of them. (2) No citizen shall, on grounds only of religion, race, caste, sex, place of birth or



any of them, be subject to any disability, liability, restriction or condition with regard to— (a) access to shops, public restaurants, hotels and places of public entertainment; or (b) the use of wells, tanks, bathing ghats, roads and places of public resort maintained wholly or partly out of State funds or dedicated to the use of the general public.

Article 15 of the Indian Constitution prohibits discrimination by the state on the basis of religion, race, caste, sex, place of birth, or any of them. While the term "sex" is mentioned in this article, it is not explicitly defined. Traditionally, it has been assumed that all individuals fall into the binary categories of male and female. However, it is crucial to understand the concept and nature of gender identity and sexual orientation before accepting the conventional definitions of "sex" as per the court.

An individual's sex is typically assigned or defined at birth based on their external genitalia. However, some people are born with both or ambiguous physiology characteristics of male and female. In certain cases, it may be challenging to determine the individual's sex as male or female based solely on their genital anatomy. Moreover, the innate perception or feeling of such persons about their own gender may not align with the sex assigned to them at birth.

Article 21

Article 21. Protection of life and personal liberty.—No person shall be deprived of his life or personal liberty except according to procedure established by law. Article 21 ensures the right to life and personal liberty, which has been interpreted to encompass the right to live with dignity and to express one's gender identity freely. The Supreme Court emphasized this in its judgments, recognizing the importance of dignity in the lives of transgender individuals.

Judicial Intervention

It is ironic to note that although the Constitution of India provides provisions for social justice it took almost six decades to decriminalize Section 377 of the Indian Penal Code.

Indian Penal Code, 1860 was drafted by Lord Macaulay and was introduced in 1861 in British India. Chapter XVI of the IPC is 'Of Offences Affecting the Human body'. Within this chapter, section 377 is there as sub-category titled "Of Unnatural Offences" and reads as: Whoever voluntarily has carnal intercourse against the order of nature with any man, woman or animal, shall be punished with the imprisonment for life, or with imprisonment of either description for a term which may extend to ten



years, and shall also be liable to fine. Explanation.—Penetration is sufficient to constitute the carnal intercourse necessary to the offence described in this section.

Such suppressive tactics of the state along with oppressive thinking of the society have often led to incidents of 'lesbian suicides' across the country (Srivastava, 2014).

Nivedita Menon has outlined the contours of 'political assertions of counter-heteronormative' which emerged in 1990s:

Such assertions are seen around the demand for the repeal of Section 377 of the Indian Penal Code, which penalizes sexual acts against the order of nature, and various kinds of political action around issues related to the lives and civil liberties of hijras, kothis (a traditional identity assumed by men who perform femininity with male lovers but may also be married to women and have children), gay, lesbian, bisexual and trans people and sex workers.

However, the AIDS Bhedbhav Virodhi Andolan (ABVA), a Delhi-based NGO, filed the first-ever petition in the Delhi Court against 377. it was the first ever organized effort towards 'demand for freedom and equality of gays and lesbian. In April 1994, ABVA filed a public interest litigation (PIL) case calling for the repeal of Section 377 on the grounds that it violated the constitutional right to privacy. Mean while, it organized a meeting wherein it was argued that Section 377 be scrapped as it 'is now antiquated, discriminatory and is a violation of the individual's right to privacy' and asked for 'the support of all progressive groups, particularly those involved in civil rights'. However, due to the unseen circumstances and lack of support by the people in general, it could not reach its desired conclusion.

In 1998 Director Deepa Mehta brought a movie named 'Fire' starring Nandita Das and Shabana Azmi. The film depicted a lesbian relationship which became controversial after release, and some organizations and private entities staged a protest against the movie's release. It can be seen as a milestone in the LGBT discourse in India where, on the one hand, 'The very expression of same-sex desire between women was deemed to be against Indian culture and generated organized and violent protests by the Hindu Right' and, on the other, 'It was the first time lesbians openly came out onto the streets of Delhi to contest the claim that homosexuality was alien to Indian culture, and challenge stark declarations that lesbians simply did not exist in India by asserting their presence in a public space'. Following the protests against Fire, 'a number of otherwise lesbian groups scattered throughout India organized themselves into a coalition called "Campaign for Lesbian Rights"' and another group CALERI (Campaign for Lesbian Rights) was formed in December 1998 in Delhi.



The next major attempt to get Section 377 of IPC repealed began in 2001 by Anjali Gopalan's Naz Foundation India Trust, Delhi which addresses issues of sexual health and spreads awareness among MSM (men who sex with men). In 2001, it filed a PIL suit with the Delhi High Court in its campaign to legalize homosexuality. It was the sustained battle by Naz, 'Voices Against 377' (a coalition of twelve NGOs and 'progressive groups'), and other like-minded organizations against the criminalization of homosexual activities that on 2 July 2009 Chief Justice A.P. Shah and Justice S. Muralidhar of Delhi High Court declared ' that Section 377 [of] IPC, insofar it criminalizes consensual sexual acts of adults in private, is violative of Articles 21, 14, and 15 of the Constitution'. However, the euphoria was short lived as the Supreme Court on 11th December 2013 once again upheld the constitutional validity of Section 377 of IPC and thereby criminalizing homosexuality.

Delhi high court judgment, 2009

In 2009 the Delhi based high court decriminalized section 377 which criminalized homosexuality based on consent and adulthood but in 2013 Supreme Court overturned the Delhi high court's decision and again recriminalized it.

NALSA Judgment, 2014

One of the major turning point in the history of transgender was occur on April 15th, 2014, after years of discrimination and hostility, the transgender persons could finally wear the legal costume of a separate identity, after Supreme Court, in the landmark judgment of National Legal Services Authority v. Union of India, recognized the third gender category in the eyes of law (Mishra, 2016). In a historic ruling on 15 April 2014, the apex court of India, in the case of National Legal Services Authority v. Union of India (NALSA 2014) declared that hijras, or eunuchs, apart from the binary gender, are to be treated as 'third gender' for the purpose of safeguarding their rights, and these persons have their right to decide their self-identified gender. After the reversal of the Delhi High Court judgement of 2009 by the Supreme Court in 2013, the NALSA judgement provided some respite to the community.

The rights of Transgender Persons Bill, 2014

Based on the judgment of NALSA, the Rajya Sabha passed the Rights of Transgender Bill, 2014 (Sawant, 2017). The Rights of Transgender Persons Bill, 2014 was introduced by Shri Tiruchi Siva, member of parliament and was discussed in the upper house of the parliament on December 10, 2014. The proposed bill offered a number of solutions to the transgender community's discriminatory problems.



It also provide rights related to education, health skill development and employment. social security, rehabilitation and recreation (The rights of transgender persons bill, 2014).

The Rights of Transgender Persons Bill, 2014 was introduced in the Rajya Sabha on 10 December 2014 followed by enthusiastic discussions on 27 February 2015 and 8 March 2015. However, the bill was not discussed in the subsequent monsoon and winter session of 2015 in Lok Sabha, and on 26 December 2015 the website of the Ministry of Social Justice and Empowerment displayed a draft bill titled 'The Transgender Persons (Protection of Rights) Bill, 2016', which according to some members did not rightly uphold all the demands of the transgender community (Sengupta, 2023).

In this bill Government shall take steps to secure full and effective participation of transgender persons and their inclusion in society, protect the rights and interests of the transgender person, formulate welfare schemes and programs which are transgender sensitive, non-stigmatizing and non-discriminatory, protection and rehabilitation of transgender persons to address the needs of such person and measures to promote and protect the right of transgender persons to participate in cultural and recreational activities. Every transgender person have a right to reside in the house-hold where parent or immed iate family members reside or a right not to be excluded from such house-hold or any part or a right to enjoy and use the facilities of such house-hold in a nondiscriminatory manner, and procedure for rehabilitation. Giving transgender people Vocational training and self employment.

In 2016 bill, Government imposed that no one compels transgender person to indulge in the act of begging or other similar forms of forced or bonded labour other than any compulsory service for public purposes, force to leave house-hold, village or other place of residence, and harms or injures or endangers the life, safety, health, or well-being, whether mental or physical, of a transgender person or tends to do acts including causing physical abuse, sexual abuse, verbal and emotional abuse and economic abuse. The punishment is not less than 6 six months but which may extent 2 years with fine. In the article 'Gatekeeping Transgender', Aniruddha Dutta points out that the Government of India's proposed Transgender Persons (Protection of Rights) Bill, 2016 sets a dangerous precedent by giving a lot of power to the district screening committees to decide who can be considered transgender and receive benefits accordingly. The bill further prevents an intersectional understanding of identity and oppression by constructing divisive frameworks of identity like the LGB versus T divide (Dutta 2013).



Decriminalization of section 377 of the Indian Penal Code

In 2016, the Naz foundation filed a petition against the 2013 Supreme Court's decision. On 6th September 2018, the Supreme Court of India with its five Constitutional Judge give the historic Judgments against Section 377 and declared consensual adult homosexual act is not an offence. (TOI, 2018)

National Council for Transgender persons

A notable development following the Supreme Court ruling to continue the upliftment and protection of transgender persons was the establishment of the National Council for Transgender Persons, a statutory body established in 2020 under the Ministry of Social Justice and Empowerment that seeks to advise the government on all policy matters regarding transgender persons under the provisions of the Transgender Persons (Protection of Rights) Act, 2019.

The Transgender Persons (Protection of Rights) Act, 2019

This act allows self perception of gender identity. But it mandates that each person would have to be recognized as 'transgender' on the basis of a certificate of identity issued by a district magistrate. The committee would comprise a medical officer, a psychologist or psychiatrist, a district welfare officer, a government official, and a transgender person. This act purposes educational, social, economic, and cultural empowerment of the transgender community in India.

The Transgender Persons (Protection of Rights) Act, 2020

The Transgender Persons (Protection of Rights) Rules, 2020 were formulated and published in the Gazette of India on September 29, 2020. The rules seek to recognize the identity of transgenders and prohibit discrimination in the fields of education, employment, healthcare, holding or disposing of property, holding public or private office, and access to and use of public services and benefits (Ministry of social justice and empowerment).

Critically analysis the Transgender Persons (Protection of rights) Act, 2019 & 2020

- Self-declaration of gender identity is issued with a certificate from the District Magistrate and evidence of having undergone sex reassignment surgery, which infringes the rights to dignity and bodily autonomy.
- Transferring a lot of emphasis on transgender women and hijras and, however, insignificant importance to others like intersex, gender queer, or transgender men.



- The decision to issue the identification certificate is entirely at the discretion of the District Magistrate, and there is no satisfactory redressal if they deny so.
- Makes no reservations for transgender persons in education and employment, despite the NALSA judgment being pronounced
- The language of the draft rules does not understand the suffering and humiliation that they cause and would be seen as regulating transgender people's bodies rather than protecting their rights.
- Provides only 13 days were given for public feedback on the draft rules, depriving the community of proper representation.
- The Act has been criticized for overlooking the demand of transgender community for reservations in the matter of appointment which was recommended in NALSA judgment (2014) by The Supreme Court of India. The Act also provides for punishment of up to two years for sexual abuse of transgender persons which is significantly less than the permission for sexual assault of women.

The Transgender Persons Act 2019 had been a step in the right direction to understand the rights of transgenders in India, but there has been considerable criticism from the community and activists that it did not address very basic issues and did not follow the principles of self-determination and equality that the NALSA judgment had spelled out. The 2020 draft rules have further exacerbated these concerns.

Conclusion

The enactment of the Transgender Persons (Protection of Rights) Act in 2019 and subsequent rules introduced in 2020, makes a significant phase in the context of transgender history of struggle for equality and recognition. These legislative measures represent a formal acknowledgement of the rights of transgender persons, in line with the constitutional principles of equality and non-discrimination expressed in Articles 14, 15 and 21.

However, this act faced many criticism for its implementation and inherent limitations. Some significant apprehensions are raised over the requirement of certificate of identity issued by a District Magistrate, which appears to defeat the very idea of self identification and may go for bureaucratic red tape. It has also been criticized as it does not ensure appropriate and complete support for all those diverse identities within the transgender community, including intersex and non-binary individuals.

Lack of awareness and sensitization and societal stigma further exacerbates their problems. They still experience discrimination and harassment in public settings, in addition to being shut out of public



services, even after laws have been changed. The degree of acceptance and understanding in society will determine how effective these rules are, in addition to the actions taken.

Though progressive in recognizing transgender rights, the Transgender Persons (Protection of Rights) Act, 2019, and the rules of 2020 remain incomplete because of an incomplete practical application. To increase change, the shortcomings need to be addressed through vigorous implementation strategies, public sensitization, and an all-comprehensive legal protection which truly reflects the dignity and autonomy of all transgender persons.

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