
ADOPTION RIGHTS OF HOMOSEXUAL COUPLES IN INDIA: A STUDY IN GENDER RIGHTS PERSPECTIVE

Mohammad Imran, Galgotias University, Greater Noida, 203201

ABSTRACT

The shifting legal and societal dynamics in India have increasingly spotlighted issues surrounding identity and choice of gender within public policy debates. The Supreme Court's 2018 decision to decriminalize Section 377 represented a pivotal advancement in LGBTQ+ rights. However, the question of adoption rights for same-sex couples remains largely unresolved and legally ambiguous. This paper critically analyzes India's existing adoption framework, focusing on how it addresses—or fails to address—the rights of homosexual couples to adopt. Framed through a gender justice lens, the study delves into the interplay between statutory law and constitutional principles such as equality and non-discrimination. The Juvenile Justice (Care and Protection of Children) Act, 2015, regulates adoption laws in India and defines “couple” as a married heterosexual couple which means man and woman. This restrictive definition disallowing same-sex couples from adopting a child jointly. Whereas LGBTQ+ individuals may adopt as a single parent but this information hinders the formation of family of same-sex couple.

The Supreme Court's ruling affirms the right of homosexual couples to cohabit with dignity and privacy, recognizing consensual same-sex relationships as constitutionally protected under the right to life and personal liberty. However, this recognition is confined to companionship and does not extend to the legal institution of marriage. Such relationships must be based on mutual consent, devoid of coercion, fraud, or exploitation, and must not infringe upon the fundamental rights of either partner.

The present work uses a doctrinal legal analysis method to conduct a thorough examination of pertinent statutes, case laws and policy documents. The research delves into several key aspects: the existing legal framework governing adoption and its exclusion of same-sex couples and social implications for children raised by homosexual parents. It also evaluates the constitutional validity of such exclusions against the principles of equality and non-discrimination enshrined in Indian law. Drawing comparisons with international best practices, the paper identifies gaps in the Indian legal

system and proposes reforms to create an inclusive and equitable approach to adoption.

Keywords: Adoption, Same-sex, Homosexual couple, JJ act, LGBTQ+.

1. Introduction

1.1 Background of the Study

Adoption laws in India are predominantly framed within a heteronormative paradigm, where the traditional concept of family is understood as comprising a male and a female parent. The Juvenile Justice (Care and Protection of Children) Act, 2015 (JJ Act), which governs adoption across the country, does not extend legal recognition to same-sex couples as prospective adoptive parents. This exclusion persists even after the decriminalization of consensual same-sex relationships under Section 377 by the Supreme Court in 2018. The lack of acknowledgment for same-sex parenthood within adoption statutes stands in sharp contrast to the constitutional values of equality, dignity, and non-discrimination that underpin India's legal framework. While the judiciary has affirmed the right of LGBTQ+ individuals to live with autonomy and respect, the legal silence surrounding adoption rights for same-sex couples remains a pressing issue both legally and socially.

1.2 Significance of the Research

Recognizing the adoption rights of same-sex couples is not only a matter of equality but also crucial to safeguarding the best interests of children and upholding the dignity of LGBTQ+ families. As visibility and advocacy for LGBTQ+ rights continue to grow in India, there is a corresponding need to revisit and reform outdated legal frameworks that do not reflect contemporary understandings of family structures. This research seeks to bridge that gap by analyzing the implications of current adoption policies and highlighting the urgency for inclusive reforms. The study thereby contributes meaningfully to the broader dialogue on gender justice, constitutional interpretation, and the evolving landscape of LGBTQ+ rights in India.

1.3 Objectives of the Study

This research sets out to:

- Examine the legal impediments that prevent same-sex couples from adopting under existing Indian laws.
- Evaluate the constitutional implications of excluding same-sex couples from adoption rights, particularly in light of the principles of equality, liberty, and non-discrimination.
- Propose legislative and policy reforms aimed at establishing an equitable and inclusive adoption regime that recognizes diverse family forms.

1.4 Research Methodology

This study adopts a qualitative research framework grounded in doctrinal legal analysis. It includes a comprehensive review of statutory provisions, judicial pronouncements, and constitutional interpretations relevant to adoption and LGBTQ+ rights. The research also undertakes a comparative examination of legal models from jurisdictions that have successfully integrated same-sex adoption, drawing insights to inform Indian legal reform. Through this interdisciplinary and comparative approach, the study aims to offer robust legal and policy recommendations to address existing gaps in the adoption system.

2. The Legal Framework for Adoption in India

Overview of Adoption Laws in India-

In India, adoption is primarily governed by the **Hindu Adoptions and Maintenance Act (HAMA), 1956** and the **Juvenile Justice (Care and Protection of Children) Act, 2015 (JJ Act)**. While HAMA allows adoption by Hindu individuals, the JJ Act governs the process of adoption of children in need of care and protection, regardless of religion.

Adoption under **Hindu Adoptions and Maintenance Act, 1956**

For an adoption to be legally recognized under the law, certain essential conditions must be met. The individual intending to adopt must have both the legal right and mental capacity to do so, while the person surrendering the child must also be legally authorized to give the child in adoption. Additionally, the child must be eligible for adoption as per the legal guidelines, and the entire process must comply with all provisions set out in the Act. Specifically, Sections 7 and 8 outline the qualifications of Hindu males and females for adopting a child. Both must

be adults and mentally sound. In cases where the adopter is married, the consent of the spouse is mandatory; any adoption done without this consent is considered void. Furthermore, a Hindu man adopting a girl must be at least 21 years older than her, and likewise, a Hindu woman adopting a boy must be at least 21 years older than the child.

Eligibility Criteria for Adoptive Parents under Section 57 of the Juvenile Justice Act-

The Juvenile Justice (JJ) Act outlines clear eligibility standards for individuals wishing to adopt, prioritizing the welfare and safety of the child. It mandates that adoptive parents must be physically and mentally healthy and capable of providing a nurturing environment. Both single and married individuals are permitted to adopt; however, in the case of married couples, joint consent is required. While single and divorced persons may adopt, single men are typically not allowed to adopt female children to safeguard the child's best interests. Compliance with the adoption procedures and guidelines set by the Central Adoption Resource Authority (CARA) is also essential. Notably, the current legal framework does not specifically acknowledge same-sex couples as prospective adoptive parents, leaving a critical legal void unaddressed by existing laws or court rulings. Limitation in Existing Laws for Homosexual Couples.

Despite the progressive shift in the legal status of homosexuality in India, there are significant limitations in adoption laws for homosexual couples. The JJ Act defines a family in a heteronormative sense and restricts adoption to legally married couples or single individuals. Consequently, same-sex couples remain excluded from adopting children, even though they may meet the criteria of a stable and loving home.

The **non-legalization of same-sex marriage** in India has a direct and significant impact on the **adoption rights of same-sex couples**. While India has made some progress in recognizing the rights of LGBTQ+ individuals, such as the decriminalization of homosexuality through the **Navtej Singh Johar v. Union of India** judgment in 2018, the absence of legal recognition for same-sex marriages still creates substantial legal and social barriers for same-sex couples wishing to adopt children. Here's how the non-legalization of same-sex marriage affects their adoption rights:

1. Exclusion from Legal Definitions of Family

Under current adoption laws in India, especially the **Juvenile Justice (Care and**

Protection of Children) Act, 2015 (JJ Act), adoption is permitted to heterosexual married couples or single individuals. The definition of "family" under these laws does not explicitly recognize same-sex couples as legitimate family units, as they are not allowed to marry legally. Since adoption laws in India are traditionally based on the nuclear family model, the non-legalization of same-sex marriage effectively excludes same-sex couples from being considered adoptive parents, irrespective of their ability to provide a loving and stable home for a child.

2. Lack of Joint Legal Standing

In marriage, spouses typically acquire joint legal standing and rights. The absence of a legal marriage between same-sex couples means they do not have joint recognition as a family unit in the eyes of the law. This lack of legal standing prevents same-sex couples from jointly applying for adoption. For instance, if one partner applies for adoption as a single parent, the other partner may not be recognized as a parent in the legal sense, even if they plan to raise the child together. This complicates the adoption process and creates uncertainty regarding parental rights and responsibilities.

3. Challenges in Parental Rights and Responsibilities

In the absence of legal marriage, one partner in a same-sex relationship may face significant challenges in asserting parental rights over a child that the other partner has legally adopted. For example, the non-adoptive partner may not be automatically recognized as a legal parent in matters related to guardianship, medical decisions, or custody if the couple's relationship is not legally recognized. This creates a situation where the child may be deprived of a stable legal and emotional relationship with both parents, which undermines the principle of the child's best interests.

4. Social and Institutional Biases

The non-legalization of same-sex marriage perpetuates societal prejudices and biases against same-sex couples, particularly in the context of adoption. Adoption agencies and courts may be influenced by these biases and may be reluctant to place children with same-sex couples, even though such couples may be fully capable of providing a stable and loving environment for the child. The lack of legal recognition for same-sex marriages can

make same-sex couples appear "less legitimate" in the eyes of adoption authorities, despite the growing global recognition of diverse family structures.

Judicial Interpretations on LGBTQ+ Rights

In India, the legal framework for adoption has not directly addressed the issue of same-sex couples adopting children. However, several significant case laws related to the **LGBTQ+ rights** in India can provide indirect insights into the evolving legal understanding of same-sex relationships and their implications for adoption rights. Here are some key case laws:

I. Navtej Singh Johar v. Union of India (2018)¹

This landmark judgment decriminalized **Section 377** of the Indian Penal Code, which criminalized consensual same-sex relationships. The Supreme Court's judgment in this case upheld the rights of LGBTQ+ individuals to equality, dignity, and privacy under the **Indian Constitution**. Though this case did not address adoption rights directly, its ruling on fundamental rights and equality has been crucial in laying the groundwork for recognizing same-sex couples in other areas of law, including adoption.

This case underscores the importance of equality and non-discrimination, principles that are vital for any future legal challenges to adoption laws excluding same-sex couples.

II. Supriyo v. Union of India (2022)²

Key take away from the judgement on the adoption rights of queer couple-

In a closely split 3:2 verdict, the five-judge bench of the Supreme Court upheld the validity of adoption regulations that restrict unmarried and queer couples from adopting children. However, in dissenting opinions, Chief Justice D.Y. Chandrachud and Justice Kaul independently ruled that the Central Adoption Resource Authority (CARA) guideline barring adoption by such couples is unconstitutional and legally unsustainable. Regulation 5(3) of CARA says "no child shall be given in adoption to a couple unless they have at least two years

¹ (2018) 10 SCC 1.

² MANU/SC/1155/2023; 2023.

of stable marital relationship stable relationship except in the cases of relative or step parent adoption.”

“There was no material on record to prove that only a married heterosexual couple can provide stability to a child,” the CJI said while pronouncing the verdict.

“The regulation 5(3) indirectly discriminate against atypical union. A queer person can adopt only in an individual capacity. This has the effect of reinforcing the discriminate against queer community.”

“Law cannot assume that only heterosexual couple can be good parents. This would amount to discrimination. So, the adoption regulations are violative of the constitution for discrimination against queer couples” the CJI said.

4 Three judges—Justice Bhat, Justice Kohli, and Justice Narsimha—disagreed with the Chief Justice of India (CJI) and upheld the CARA (Central Adoption Resource Authority) regulations. Regarding civil unions, the bench criticized the government's argument that demands for legal recognition of same-sex marriage were limited to the "urban elite." The CJI emphasized that the right to form a union includes the freedom to choose a life partner and to have that union legally acknowledged. The Court observed that denying recognition to same-sex relationships leads to discriminatory treatment of queer couples and that such a failure by the State constitutes a violation of their fundamental rights.

5 NALSA V. UNION OF INDIA³

The **National Legal Services Authority (NALSA)** case was a significant judgment in which the Supreme Court recognized the rights of transgender persons in India, including their right to self-identify their gender. The judgment granted **transgender persons** the legal recognition as a third gender under the **Indian Constitution**.

Although the case did not specifically address adoption by transgender or same-sex couples, it acknowledged the rights of non-normative gender identities and could potentially be used as a legal precedent to argue for equal rights for same-sex couples in

³ (2014) 5 SCC 438.

adoption laws. It supports the broader idea of recognizing and respecting diverse family structures in Indian law.

III. The National Commission for Women v. Union of India (2020)⁴

In this case, the **Supreme Court** heard a petition regarding the legal recognition of **same-sex marriages**. While the court did not directly rule on adoption rights for same-sex couples, the arguments brought forward highlighted the need for legal recognition of same-sex relationships, including in the context of family laws.

This case suggests that the legal framework around family and marriage in India needs to evolve to recognize diverse family structures, which should include same-sex couples seeking to adopt children.

While Indian case law has made significant strides in the recognition of LGBTQ+ rights, adoption by same-sex couples remains an area not yet addressed directly by the courts. However, judgments like *Navtej Singh Johar* and *K.S. Puttaswamy* provide a foundation for future legal challenges aimed at including same-sex couples in the adoption framework. The rights of LGBTQ+ individuals, including the right to form families, could play a pivotal role in evolving India's legal stance on adoption.

3. Constitutional Perspective on Adoption Rights

The right to be treated equally under the law, without unfair discrimination or favoritism.

Article 14 ensures equal treatment under the law. Excluding same-sex couples from adoption rights may violate this guarantee by discriminating based on sexual orientation. In the *Navtej Singh Johar v. Union of India* (2018) verdict, the Supreme Court ruled that such discrimination is unconstitutional. This ruling strengthens the argument that barring same-sex couples from adopting is a breach of their right to equality.

The right to live with dignity and make personal choices about one's life and relationships.

⁴ (2020) 14 SCC 540.

Article 21 secures every individual's right to live with dignity, including the freedom to make intimate and family-related decisions. In *K.S. Puttaswamy v. Union of India* (2017), the Supreme Court confirmed that personal privacy encompasses the right to choose family arrangements. Denying adoption rights to same-sex couples undermines their dignity and infringes on their liberty to establish and nurture families of their choice. The *Navtej Singh Johar* ruling further supports the right of LGBTQ+ individuals to lead dignified lives with autonomy, reinforcing that adoption should be part of those freedoms.

The right to be treated equally, without bias or unfair treatment because of your gender or sexual orientation.

Although Article 15 explicitly prohibits discrimination on the basis of sex, the denial of adoption rights to same-sex couples can be interpreted as indirect discrimination rooted in sexual orientation. This calls for urgent legal reforms to bring adoption laws in line with constitutional guarantees of equality and non-discrimination.

Guidelines in the Constitution that direct the government to create fair and just laws for the well-being of all citizens.

The **Directive Principles of State Policy (DPSPs)** guide the state in promoting social justice, equality, and the welfare of its citizens.

Application to Adoption Rights:

- Article 39(e) and (f): These provisions emphasize that children should grow in a safe and healthy environment, free from exploitation, and that their best interests should be prioritized. Allowing adoption by same-sex couples aligns with this principle, as it ensures more children have access to stable and loving families.
- Article 44: Advocates for a **Uniform Civil Code (UCC)** that eliminates discriminatory personal laws. Reforming adoption laws to recognize same-sex couples would be a step toward achieving uniformity and inclusivity.

International Human Rights and Constitutional Interpretation

Indian constitutional rights are often interpreted in harmony with international human rights

instruments, even if these are not directly enforceable in domestic law. In the context of adoption rights, global frameworks such as the Universal Declaration of Human Rights (UDHR) support principles of equality and the right to form a family, reinforcing the case for inclusive adoption laws. The Convention on the Rights of the Child (CRC), which India has ratified, emphasizes the best interests of the child—suggesting that allowing same-sex couples to adopt would help more children find nurturing homes. Additionally, the Yogyakarta Principles, which outline international standards on sexual orientation and gender identity, advocate for non-discrimination in family and adoption laws. Notable principles affirm rights to equality, legal recognition, life, personal security, privacy, and the ability to form families. Together, these global standards strengthen the constitutional argument for extending adoption rights to same-sex couples in India.

Policy Recommendations and Legal Reforms for Adoption Rights of Same-Sex Couples in India-

1. Bridging Legal Gaps for Equal Adoption Rights

a. Legalising Same Sex Marriage

The absence of legal recognition for same-sex marriages in India poses a major obstacle to granting joint adoption rights to LGBTQ+ couples. To address this, it is recommended that the Special Marriage Act, 1954 be amended to explicitly include same-sex unions. Such a change would allow same-sex couples to access adoption rights under existing laws like the Hindu Adoption and Maintenance Act (HAMA), 1956, and the Juvenile Justice (Care and Protection of Children) Act, 2015, thereby ensuring equal parenting opportunities and legal protections for queer families.

b. Amending the Juvenile Justice Act

- The **JJ Act, 2015**, limits adoption to married couples and individuals, excluding same-sex couples.
- **Recommendation:**
 - Redefine "family" in the JJ Act to include diverse family structures, explicitly recognizing same-sex couples as eligible adoptive parents.

- Remove any clauses that implicitly discriminate against LGBTQ+ individuals or couples.

c. Strengthening Anti-Discrimination Laws

- There is no comprehensive anti-discrimination law in India to address biases in adoption agencies or government bodies.
- **Recommendation:**
 - Enact a comprehensive **Anti-Discrimination Act** that prohibits discrimination based on sexual orientation or gender identity in adoption processes and other public services.

2. Promoting Inclusivity Through Legal and Social Advocacy

a. Judicial Intervention

- The judiciary has played a pivotal role in advancing LGBTQ+ rights in India, as seen in **Navtej Singh Johar case** and **NALSA v. UOI (2014)**.
- **Recommendation:**
 - Encourage public interest litigation to challenge discriminatory adoption laws and seek judicial recognition of the rights of same-sex couples to adopt.
 - Advocate for judicial interpretation of **Articles 14, 15, and 21** to extend constitutional protections to LGBTQ+ families.

b. Inclusive Policy Drafting

- Adoption policies often overlook the unique challenges faced by same-sex couples.
- **Recommendation:**
 - Involve LGBTQ+ community representatives in the drafting and review of adoption-related laws and policies.

- Ensure policies explicitly promote diversity and inclusion in family structures.

c. Recognition of Non-Traditional Families

- The traditional definition of a family in Indian law excludes non-heteronormative relationships.
- **Recommendation:**
 - Update the legal definition of family in all adoption and family-related laws to include non-traditional families, including same-sex couples and single-parent households.

3. Legislative Reforms

a. Uniform Civil Code (UCC)

- Adoption laws are governed by religious personal laws, which often exclude LGBTQ+ individuals and couples.
- **Recommendation:**
 - Introduce a **Uniform Civil Code** that includes provisions for same-sex couples, ensuring equal rights in marriage, adoption, and family formation.

b. Removing Discriminatory Clauses in Existing Laws

- Existing laws like HAMA indirectly exclude same-sex couples by requiring a heterosexual marital relationship for adoption.
- **Recommendation:**
 - Amend such laws to focus on parenting capability and the child's welfare rather than marital or gender-based criteria.

1. Challenges and the Way Forward-

1. Legal Barriers

- **Absence of Marriage Equality:**

- Current adoption laws, such as the **Act of 1956** dealing with marital status for joint adoption and Act of 2015 empathizing child rights and their well-being which excludes same-sex couples.
- The lack of legal recognition for same-sex marriages restricts couples from adopting children jointly.

- **Definition of Family:**

- Indian laws adhere to traditional definitions of family, which do not encompass non-heteronormative relationships.

- **Judicial Gaps:**

- Despite progressive rulings in **2018 judgement**, courts have yet to explicitly address the adoption rights of LGBTQ+ couples.

2. Societal Resistance

- **Cultural Conservatism:**

- Deeply ingrained cultural and religious beliefs often view same-sex relationships as unnatural or immoral, creating societal resistance to recognizing same-sex families.

- **Stigma and Discrimination:**

- LGBTQ+ individuals face discrimination not only in the broader society but also within adoption agencies and government institutions.

- **Limited Public Awareness:**

- Many people lack awareness about the parenting potential of same-sex couples, perpetuating stereotypes that they are unfit to raise children.

3. Institutional Challenges

- **Bias in Adoption Agencies:**

- Adoption agencies and childcare institutions often lack training and sensitivity regarding LGBTQ+ rights, leading to biased evaluations of same-sex applicants.

- **Administrative Delays:**

- Even when LGBTQ+ individuals are eligible to adopt as singles, bureaucratic hurdles and scrutiny can delay the process.

4. Child Welfare Concerns

- **Myths About Parenting:**

- Misinformed perceptions suggest that children raised by same-sex couples may face developmental or social challenges, despite evidence to the contrary.

- **Potential Bullying or Stigma for Children:**

- Concerns about societal bullying or stigmatization of children adopted by same-sex couples further complicate acceptance.

5. Policy Inertia

- **Lack of Political Will:**

- The absence of LGBTQ+ representation in policymaking and hesitation among political leaders to address contentious social issues hinder progress.

- **Fragmented Advocacy:**

- While there are active LGBTQ+ rights movements, there is limited specific advocacy focused on adoption rights and family law reforms.

The Way Forward

1. Legal Reforms

- Allowing same-sex couples to legally marry and have their relationships officially recognized by law.
- The legalization of same-sex marriages is crucial for enabling joint adoption rights.
- Amend the legislation enacted in the year 1954 dealing with marriage rules applying at every religion, and related laws to recognize same-sex marriages.
- **Amending Adoption Laws:**
 - Redefine "family" in the **Juvenile Justice Act, 2015**, and **HAMA** to include same-sex couples.
 - Eliminate requirements that restrict joint adoption to heterosexual married couples.
- **Judicial Activism:**
 - Courts should expand the interpretation of **Articles 14, 15, and 21** to include adoption rights for same-sex couples as part of the right to equality and dignity.

2. Public Awareness and Advocacy

- **Education Campaigns:**
 - Nationwide campaigns should focus on normalizing same-sex parenting and addressing myths about their parenting abilities.
- **LGBTQ+ Visibility:**
 - Promote LGBTQ+ representation in media, literature, and public discourse to challenge stereotypes and foster acceptance.

- **Community Engagement:**

- Partner with religious leaders, NGOs, and cultural influencers to build bridges between traditional values and progressive reforms.

3. Institutional Changes

- **Training for Adoption Agencies:**

- Implement mandatory sensitivity and inclusivity training for adoption agency personnel to ensure fair treatment of LGBTQ+ applicants.

- **Regulatory Oversight:**

- Establish independent bodies to oversee adoption processes and address complaints of discrimination against same-sex couples.

- **Simplifying Adoption Procedures:**

- Streamline adoption procedures to minimize delays and ensure equitable access for LGBTQ+ individuals and couples.

4. International Collaboration

- **Learning from Global Practices:**

- Study successful models from countries like Canada, the Netherlands, and South Africa, where same-sex couples have equal adoption rights.

- **Adopting International Standards:**

- Align Indian adoption laws with the Yogyakarta Principles and the CRC to promote equality and inclusivity.

5. Advocacy and Policy Development

- **Research and Data Collection:**

- Conduct studies on the outcomes of children raised by same-sex couples to counter myths and provide evidence-based policymaking.
- **Grassroots Movements:**
 - Empower LGBTQ+ activists and allies to advocate for equal family rights through grassroots campaigns and public demonstrations.
- **Inclusive Policy Drafting:**
 - Involve LGBTQ+ community representatives in drafting policies to ensure their needs and perspectives are adequately addressed.

Further research is needed to assess the impact of legal reforms on children's welfare in same-sex adoptive families and the long-term benefits of legalizing same-sex adoption rights.

Conclusion

The denial of adoption rights to same-sex couples in India highlights the disparity between constitutional principles of equality and the existing legal framework. Adoption laws, rooted in traditional definitions of family, exclude LGBTQ+ individuals and couples, depriving both them and children in need of stable, loving homes. By learning from global practices and embracing inclusive reforms, India can bridge this gap and ensure that adoption laws align with the ideals of equality, dignity, and non-discrimination.

Globally, several progressive jurisdictions have recognized the rights of same-sex couples to adopt, demonstrating that such inclusivity does not harm societal values but instead strengthens them by promoting equality, love, and acceptance. India can draw valuable lessons from these international practices and align its adoption laws with global human rights standards, such as the Yogyakarta Principles and the CRC.

Recognizing the adoption rights of same-sex couples is not just about legal change—it is a step toward fostering an inclusive society that values love and family in all its forms. By addressing societal biases, reforming laws, and promoting awareness, India can uphold the best interests of children while ensuring justice and equality for all.

REFERENCES

- 1) Sudhir Krishnaswamy, "Same-Sex Relationships and the Indian Legal Framework: A Constitutional Analysis", *Indian Journal of Constitutional Law*, 2020.
- 2) Priyanka Thakur, "Adoption Rights of Same-Sex Couples: Challenges and Perspectives in India", *Asian Journal of Legal Studies*, 2022.
- 3) Gautam Bhatia, "The Navtej Johar Judgment: A Step Toward Equality", *Economic and Political Weekly*, 2018.
- 4) Shubhangi Gupta, "Legal Recognition of Same-Sex Families in India: A Way Forward", *National Law University Law Review*, 2021.
- 5) Arvind Narrain and Alok Gupta, "LGBT Rights in India: History and Activism", Sage Publications, 2016, pp-11-17.
- 6) Naisargi N. Dave, "Queer Activism in India: A Story in the Anthropology of Ethics", Duke University Press, 2012, pp-117-128.
- 7) "The Yogyakarta Principles: Principles on the Application of International Human Rights Law in Relation to Sexual Orientation and Gender Identity", *International Commission of Jurists*, 2007.
- 8) "UN Convention on the Rights of the Child (CRC)", United Nations, 1989.
- 9) "Navigating LGBTQ+ Rights in India: Advocacy and Policy Recommendations", *Human Rights Watch*, 2021.
- 10) "Equality for All Families: Addressing LGBTQ+ Adoption Discrimination", *International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA)*, 2018.