
AN OVERVIEW OF THE TRANSGENDER RIGHTS IN INDIA

Aarthi Shankar, BA LLB(Hons), Saveetha School of Law , Saveetha Institute of Medical and Technical Sciences (SIMATS) Saveetha University, Chennai-77

ABSTRACT

People who has gender identity or gender expression which differs the sex that they were assigned at birth are knows as transgenders. These people face lots of challenges and problems in society and rights are not granted to them equally. Every person in this world deserves to be respected despite any religion, caste or gender. Transgender people should also be treated equally and they should deserve all the right in the constitution as normal human rights. Transgender people are still struggling for their survival and also experiencing discrimination in many fields including employment, health, sports, devotional places, public places etc and at times many faces harassment also. Transgenders have no access to bathrooms and public spaces, similar difficulties are being faced by them in prisons, hospitals and educational institutions. The Transgender Persons (Protection of Rights) Act 2019 was passed and several provisions were made in order to protect the rights of the transgender people. Moreover, The Supreme Court has directed the Centre and State government to grant legal recognition of gender identity whether it be Male, female or third gender. An empirical study was carried out among the 520 respondents, the results shows that both the male and female respondents are aware about the transgender persons protection act 2019, the problems faced by the transgenders are homelessness, lack to access of bathroom, and unemployment and in most of devotional places and in educational institutions they still face discrimination and it was found there is significant association between the transgender being discriminated at workplace and gender of the respondents. It shows that that there is no gender based discrimination at workplace. It is suggested that more public awareness and legal measures should be initiated further by the government in order to improve the situation and standards of transgender people.

Keywords: Discrimination, Homelessness, Harassment, Equality and Constitutional rights.

INTRODUCTION:

People who have gender identity or gender expression which differs the sex that they were assigned at birth are known as transgenders. These people face lots of challenges and problems in society and rights are not granted to them equally. Every person in this world deserves to be respected despite any religion, caste or gender. Transgender people should also be treated equally and they should deserve all the rights in the constitution as normal human rights. Transgender people are still struggling for their survival and also experiencing discrimination in many fields including employment, health, sports, devotional places, public places etc and at times many face harassment also. The challenges faced by transgender are health issues where they don't get treatment equally unlike other human beings and they face other health issues like gender dysphoria etc. The major challenge faced by transgender's are inhuman activities. Activities like rejection in entering the public places and religious places, most of the parents of transgender force them to leave the house, abusing them in public, insulting them, though these people were transgenders they face lots of rape instigation verbal and physical violence by the men of the society. Another major challenge faced by these people is poverty, this is due to lack of education and lack of employment opportunities. Transgenders have no access to bathrooms and public spaces, similar difficulties are being faced by them in prisons, hospitals and educational institutions. In 2014 access to the education institutions was opened for these people as a third gender community. Transgender protection of rights act came into force on 2019. The Act has a provision under section 16 for the formation of a National council for transgender, which is supposed to work for the welfare of transgender community, provisions have been made for rescuing and rehabilitation of transgender people as well. The Constitutional rights of transgender people is that they deserve right to equality under Article 14. Prohibition of discrimination on the ground of religion, race, caste, sex or place of birth under Article 15. Article 21 ensures the right to privacy and personal dignity to all the citizens. Article 23 prohibits trafficking in human beings as beggars and other similar forms of forced labor and any contravention of these provisions shall be an offence punishable in accordance with law. The Constitution also guarantees political rights and other benefits to every citizen. But the third community (transgenders) are being excluded from it. Comparing the transgender rights in Pakistan, the Pakistan parliament has passed a landmark bill, which gives the country's transgender citizens fundamental rights. The Transgender Persons Act allows the people of Pakistan to choose their gender to have that identity recognized on official

documents, including national IDs, passports and driver's licenses. The bill also prohibits discrimination in schools, at work, on public modes of transit and while receiving medical care. The measure also says that transgender people cannot be deprived of the right to vote or run for office. In India, The Transgender Persons (Protection of Rights) Act 2019 was passed and several provisions were made in order to protect the rights of transgender people . Moreover, The Supreme Court has directed the Centre and State government to grant legal recognition of gender identity whether it be Male , female or third gender. In recognizing the third gender category, the Court ruled that fundamental rights are available to the third gender in the same manner as they are to males and females. Further, non-recognition of third gender in both criminal and civil statutes such as those relating to marriage, adoption, divorce, etc is discriminatory to the third gender. Centre and State Governments have been directed to take proper measures to provide medical care to Transgender people in the hospitals and also provide them separate public toilets and other facilities. Centre and State Governments have been asked to provide the community various social welfare schemes and to treat the community as socially and economically backward classes. They have also been asked to extend reservation in educational institutions and for public appointments. Public Awareness and legal measures should be initiated further by the government in order to improve the situation and standards of transgender people . The main aim of this study is to determine the problem and challenges faced by the transgender's and also to analyse the rights guaranteed by the government to the transgender people.

OBJECTIVES :

- To determine the the problem and challenges faced by the transgender's .
- To analyse the rights guaranteed by the government to the transgender people.
- To find out the awareness about Transgender Persons Protection of Rights Act , 2019 among the general public.
- To examine at which field the transgender's are being more discriminated.
- To find out the ways to improve the situation of the transgender's.

REVIEW OF LITERATURE:

(Sethi 2018)¹ has discussed about transgender health and their rights in India , Futher the author stated that transgender experiences discriminatory treatment by healthcare providers and also other barriers related to health care. **Jennifer zing Loh (2018)**² has explored the identity of transgender and also revealed about the LGBT communities and stated that the currently the transgender identity are being conceptualised as legitimate has analysed the transgender persons protection of rights Bill , 2016 and stated that the act provides special provisions are made for registration,surveillance ,control of certain criminal tribes , right to education etc are granted to the transgender's . **Sourav Agarwal (2017)** ³ has explored the civil and political rights of transgender in Indian constitution and has also analysed the statutory provisions that have not been sufficient to protect the rights of the transgender which would end in violation of their basic fundamental rights . **Akanksha Mishra (2016)**⁴ has examined the third gender rights as battle for equality and stated that the various rights granted to the community and the authors has also stated about the suffering and discrimination faced by them. **Swarupa Deb (2016)** ⁴ This article has described about the distress and discrimination of Indian Transgender communities and stated that despite of many attempts and initiatives taken by the state , international human rights law still the transgender community has been experiencing discrimination in health care service. This article provides an overview of the current situation of transgender community and also focuses on Transgender Person Bill and stated that the bill provides a mechanism for gender recognition .Further it was stated that the transgender people face harassment , discrimination and violence by the police on a daily basis . **Jeyaseelan .M (2015)**⁵ has determined the level of knowledge of transgender on right to education and privileges and concluded that there was limited knowledge on state government policies and privileges among the respondents has explored the socio legal exploitation of the third gender in India and also focused on the disclosure of social justice, from distribution to a dignified recognition. **Aneesh (2016)** ⁷ has explored the social exclusion of physically disabled transgender in Kerala and stated the areas in which the third gender are excluded such as

¹ Sethi, Sujita. 2018. "Transgender Health and Their Rights in India." *Social Inclusion-Policies and Practices*, October. <http://dx.doi.org/>.

² Jennifer zing Loh (2018)"SAGE Journals: Your Gateway to World-Class Research Journals." n.d. Accessed March 22, 2021. <https://journals.sagepub.com/action/cookieAbsent>.

³ Sourav,Agarwal(2017)<http://journals.christuniversity.in/index.php/culj/article/download/995/755/2062>.

⁴AkankshaMishra(2016)[https://www.worldwidejournals.com/indian-journal-of-applied-research-\(IJAR\)/recent_issues_pdf/2015/September/September_2015_1492523553__40.pdf](https://www.worldwidejournals.com/indian-journal-of-applied-research-(IJAR)/recent_issues_pdf/2015/September/September_2015_1492523553__40.pdf).

⁴ Swarupa Deb (2016)http://www.journalijar.com/uploads/425_aneesh.pdf.

⁵ Jeyaseelan.M(2015)http://www.shanlaxjournals.in/pdf/ASH/V4N1/Ash_V4_N1_007.pdf.

⁷ Aneesh(2016)<https://www.tandfonline.com/doi/abs/10.1080/01634370802609056>.

education, medical ,employment etc and further the researcher stated that the transgender are not benefited from any disabilities rehabilitation services of government and NGOS have examined about the transgender health in India and Pakistan and stated that the there is reduced engagement in health promotion and disease prevention activities to the transgender's and Futher the researchers stated that because of social discrimination and stigma most transgender people in India and Pakistan have no opportunity for schooling's or access to higher education has revealed the status and challenges faced by the transgender's in education sector and also focused on the participation of them in main streams like higher education, professional education and employment. **Dr.A.Balu (2020)**⁶ has discussed about the confront issues on education of transgender's in India and stated that transgender community is a part of the social order and has equal rights in everything which is applicable to all the others in the world .Further the author has revealed about the problems faced by the transgender's in society . **Kimberly Tower (2016)**⁷ has examined the social and legal acceptance of the transgender community in developing countries and stated that the rights of LGBT have been increasing and they have given equal status of marriage , anti discrimination legislation etc has explored the unique challenges of transgender aging and stated the challenges of adequate healthcare , social support and legal obstacles have been faced by many elderly individuals , the terminology of transgender is presented, and the issues facing aging transgender individuals are identified. has revealed about Hijra in India and stated that transgender people in India is commonly known as the hijars and they may be male or female are socially excluded in Indian society and the author has also focused on the sociocultural exclusion of Hijra depending on their gender identity disorder has revealed about the Pakistan transgender persons act of 2018 and its impact on the law of gender in Pakistan and suggested that areas where the 2018 Act will have to be amended to address key rights issues that remain outstanding in Pakistan. **Dr.Kalpana V Jawale (2016)** ⁸ has revealed the issues and challenges of LGBT minority people in India and also the author has focused on legal definition and its scope , lacunas issues and challenges before LGBT minority people in India and the author has also analysed the legal provisions and consequences of discrimination in the society. **P.Vimala S.Vanaja Kumari (2016)** ⁹ has revealed he stigmatisation and distress among the transgender individuals and

⁶ Dr.A.Balu (2020)<https://core.ac.uk/download/pdf/233615349.pdf>.

⁷ KimberlyTower(2016)<http://euroasiapub.org/wp-content/uploads/2016/12/2ESSNov-4296.pdf>.

⁸ Dr.KalpanaV,Jawale(2016)<https://www.allresearchjournal.com/archives/2016/vol2issue6/PartG/2-4-128-110.pdf>.

⁹ P.Vimala,S.VanajaKumari(2016)<https://www.ijcmph.com/index.php/ijcmph/article/viewFile/2490/186>

stated that in the present scenario they face innumerable stigma and discrimination in the society which often results in psychological distress has revealed the assessment of quality of life of transgender adults in an urban area of Burdwan district and stated that transgender people are stigmatised in the society and also discussed about the problems and challenges faced by the transgender.

METHODOLOGY:

This study is based on primary data collection by the researcher and the secondary data from books , journals, and online sources. The present study used a simple random sampling method for selection of samples. A Total number of 520 sample respondents in the age group 18-50 years are collected .By using graphical representation the dependent variables are the problems and challenges faced by the transgenders , Awareness regarding the Transgenders person protection of Rights Act , 2019 and independent variables are age , gender and educational qualifications and occupation. Statistics are represented by graphical representation

Hypothesis:

Alternative hypothesis: There is a significant association between problems faced by transgender's in India.(Homelessness) and (unemployment).

Null hypothesis: There is no significant association between There is a significant association between problems faced by transgender's in India.(Homelessness) and (unemployment).

ANALYSIS:

FIGURE: 1

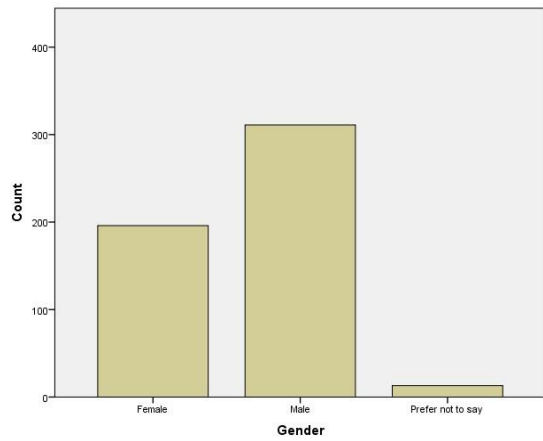
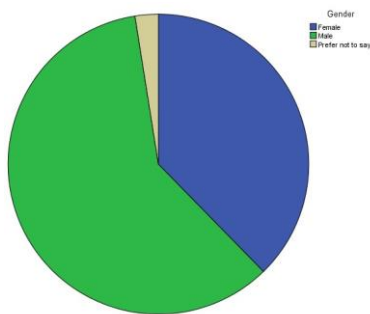


FIGURE 2 :



LEGEND:

Out of 520 respondents 200 belong to females , 300 are male and others belong to prefer not to say

FIGURE: 3

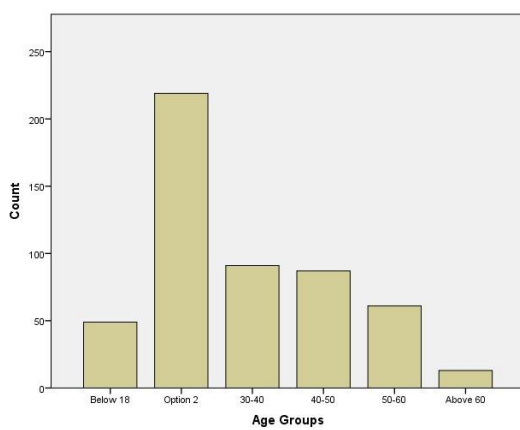
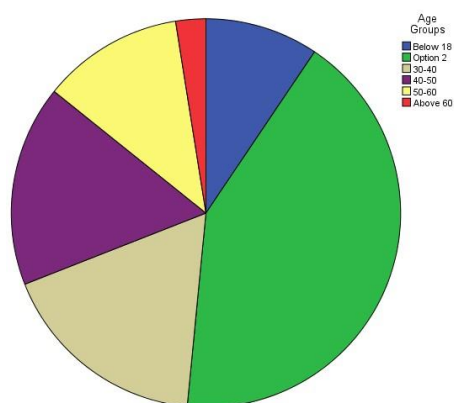
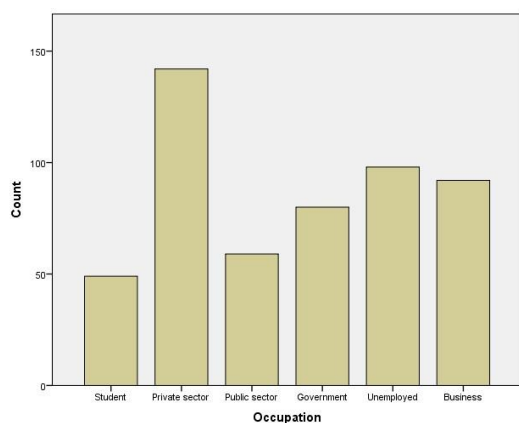
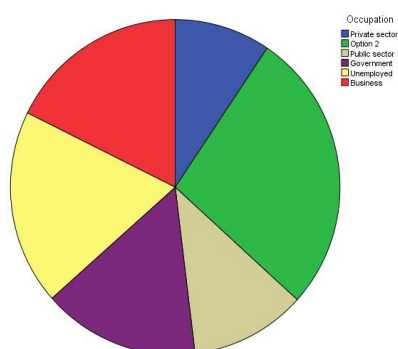


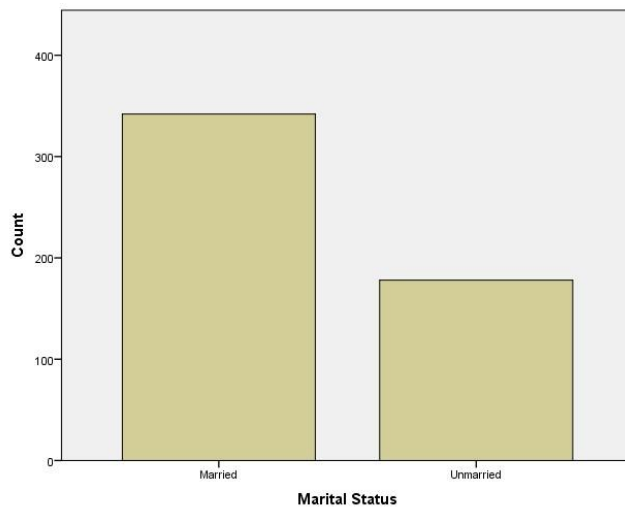
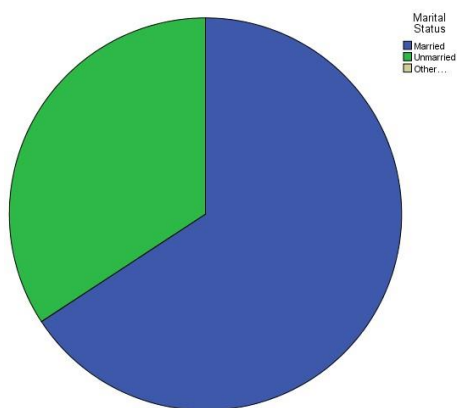
FIGURE 4:**LEGEND :**

Out of 520 respondents , 50 are below 18 , 200 belong to the age groups of 18-30 , 100 belong to the age groups of 30-40 and 40-50 and 50 respondents between the age groups of 50-60 and remaining are above 60.

FIGURE 5:**FIGURE 6:**

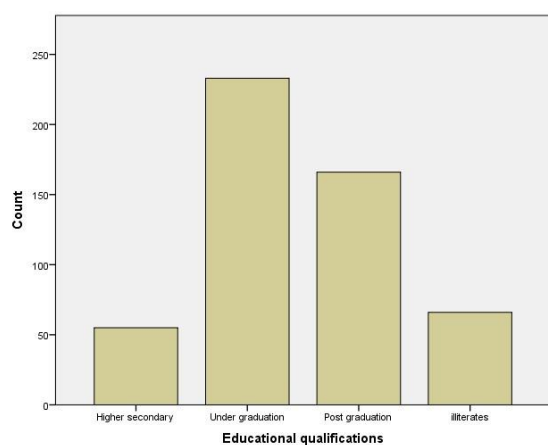
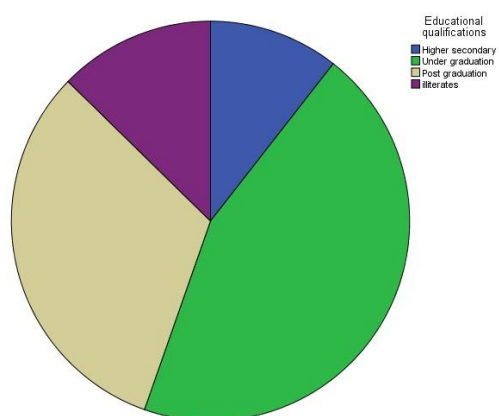
LEGEND:

Out of 520 respondents ,50 respondents are students, 150 respondents are under the private sector, 50 respondents are under the public sector ,75 respondents and the government 90 respondents are unemployed and the remaining are doing business.

FIGURE: 7**FIGURE 8:****LEGEND:**

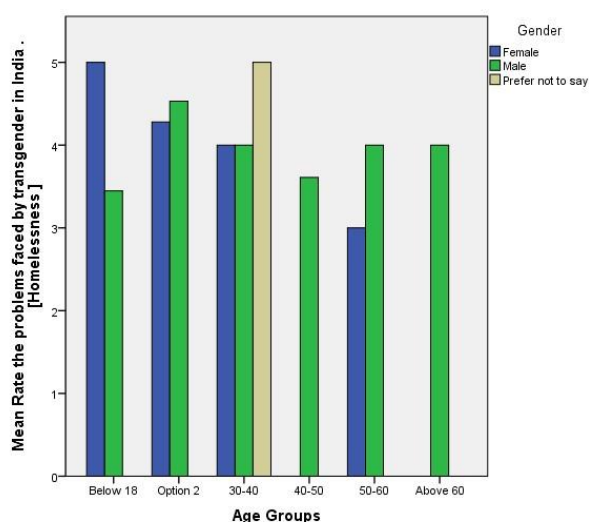
Out of 520 respondents 320 respondents are married and remaining respondents are unmarried.

FIGURE 9 :

**FIGURE 10:****LEGEND:**

Out of 520 respondents, 243 respondents are undergraduates, 167 respondents are post graduates, 50 respondents have completed their higher secondary and 60 respondents are illiterates.

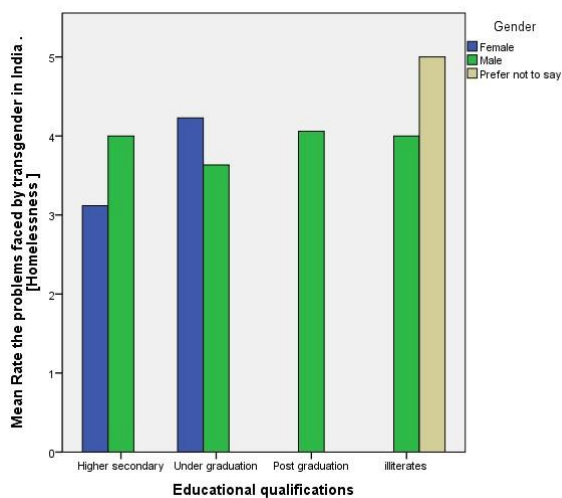
FIGURE 11:



LEGEND:

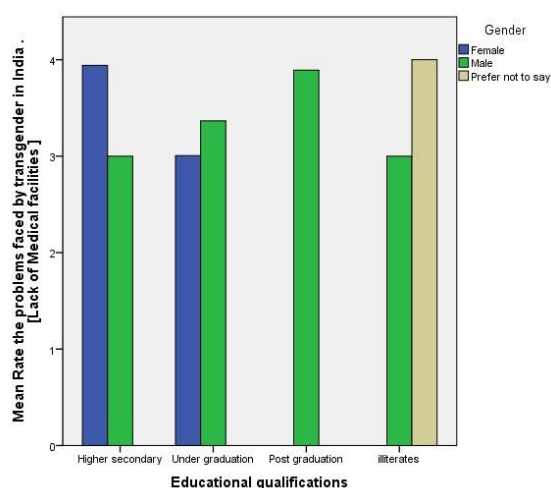
The various age groups of people pertaining to their gender and their preferences towards the problems faced by transgender's in India . (Homelessness).

FIGURE : 12

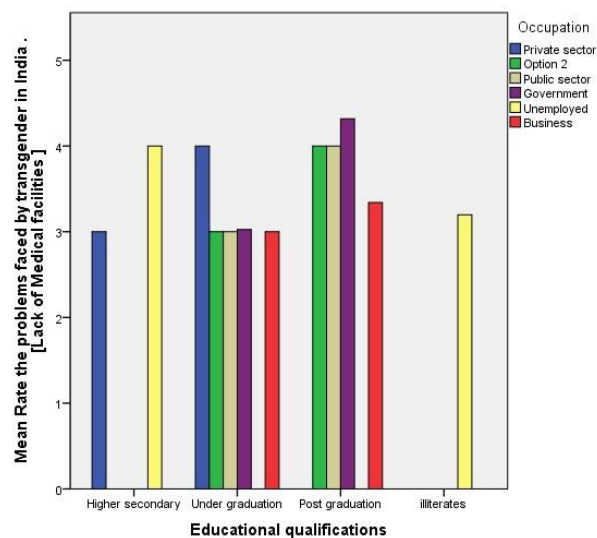


LEGEND :

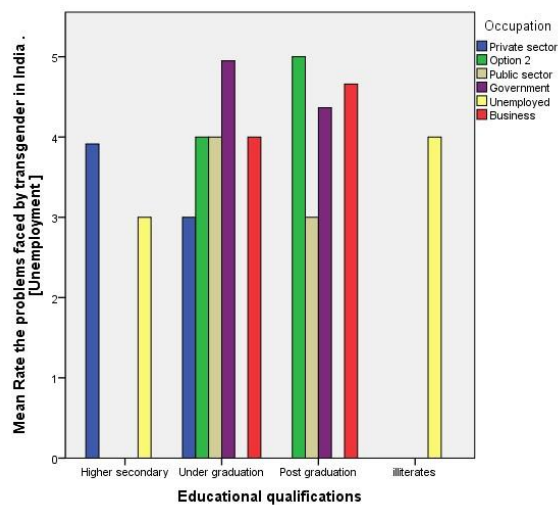
The various educational qualifications of the respondents pertaining to their gender and their preferences towards the problems faced by transgender's in India . (Homelessness).

FIGURE : 13**LEGEND:**

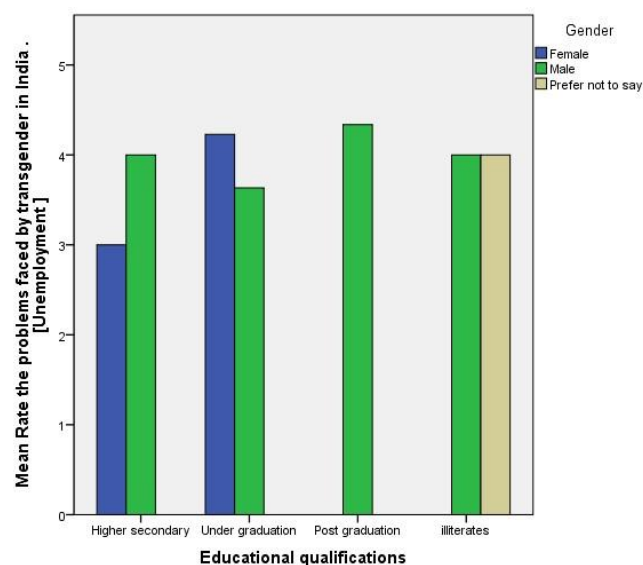
The gender of the respondents pertaining to their educational qualifications and their preferences towards the problems faced by transgender's in India .(Lack of Medical facilities).

FIGURE: 14**LEGEND:**

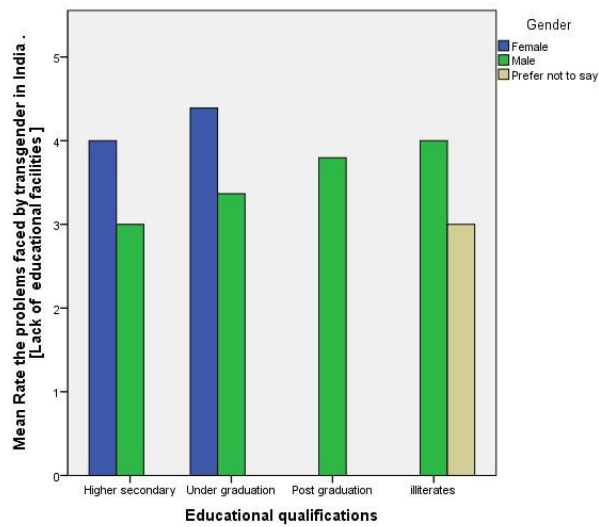
The various occupation of the respondents pertaining to their educational qualifications and their preferences towards the problems faced by transgender's in India .(Lack of medical facilities) .

FIGURE 15:**LEGEND:**

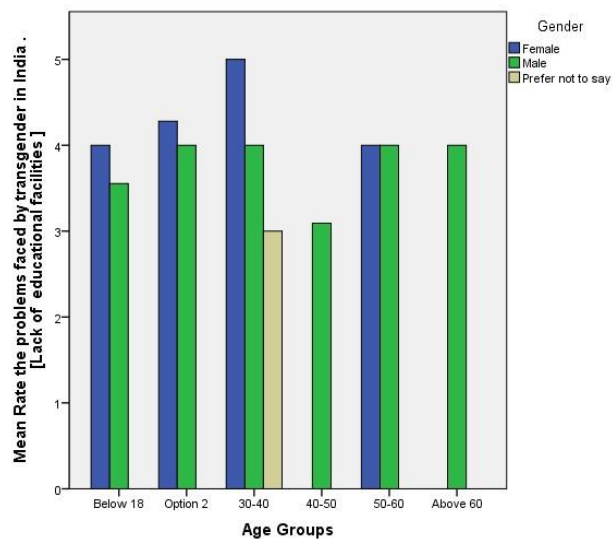
The occupation of the respondents pertaining to their educational qualifications and their preferences towards the problems faced by transgender's in India (unemployment) .

FIGURE 16:**LEGEND:**

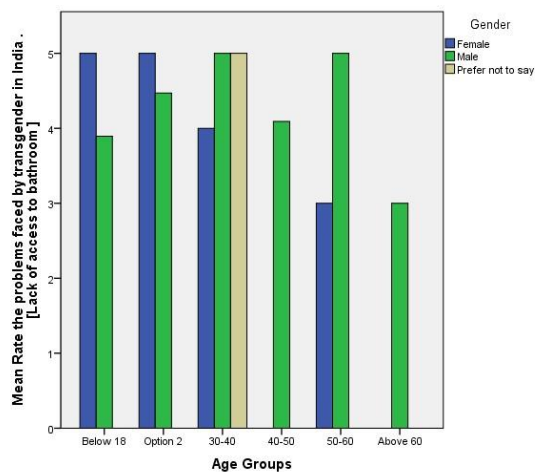
The various educational qualifications groups of the respondents pertaining to their gender and their preferences towards problems faced by transgender in India (Unemployment)

FIGURE 17:**LEGEND:**

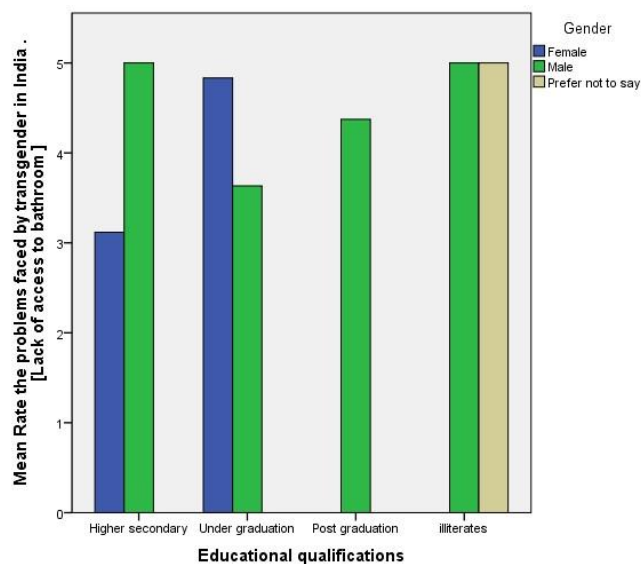
The gender of the respondents pertaining to their educational qualifications and their preferences towards the problems faced by transgender's in India(Lack of educational facilities).

FIGURE 18:**LEGEND:**

The various age groups of the respondents pertaining to their gender and their preferences towards the problems faced by transgender's in India.(Lack of educational facilities).

FIGURE 19:**LEGEND:**

The age groups of the respondents pertaining to their gender and their preferences towards the problems faced by transgender's in India.(Lack of access to bathroom)

FIGURE 20:

LEGEND: The gender of the respondents pertaining to their educational qualifications and their preferences towards preferences towards the problems faced by transgender's in India. (Lack of access to the bathroom) .

RESULTS:

(FIGURE 1&2) Out of 520 respondents 200 belong to females , 300 are male and others belong to prefer not to say.(FIGURE 3&4) Out of 520 respondents , 50 are below 18 , 200 belong to the age groups of 18-30, 100 belong to the age groups of 30-40 and 40-50 and 50 respondents between the age groups of 50-60 and remaining are above 60.(FIGURE 5&6) Out of 520 respondents ,50 respondents are students, 150 respondents are under the private sector, 50 respondents are under the public sector ,75 respondents and the government 90 respondents are unemployed and the remaining are doing business.(FIGURE 7&8) Out of 520 respondents 320 respondents are married and the remaining respondents are unmarried.(FIGURE 9&10) Out of 520 respondents, 243 respondents are undergraduates, 167 respondents are post graduates, 50 respondents have completed their higher secondary and 60 respondents are illiterates.(FIGURE 11) Respondents belonging to the prefer not to say category , Female respondents between the age groups of 18-30 and male respondents between the age groups of 30-40 have rated 5 which shows that homelessness is one of the major problems faced by the transgenders in India. (FIGURE :12) Female respondents who have completed their higher secondary and male respondents who have completed undergraduate and postgraduate have rated 5 which shows that homelessness is the major problem faced by the transgenders.(FIGURE 13) Female respondents who have completed their higher secondary and male respondents who have completed their post graduates have rated 4 which indicates that lack of medical facilities doesn't create major problems upon the transgender.(FIGURE 14) Respondents who have completed their undergraduate and working in public sectors, respondents who are working in public sector and business having completed their post graduation have rated 4 which indicates that the lack of medical facilities doesn't create major problems upon the transgender.(FIGURE 15) Respondents working under government sectors and completed their undergraduate and respondents who have completed their post graduates and working in public sectors have rated 5 which indicates that most of the transgender faces unemployment, still in major areas people are not preferred to employ a transgender which creates a major problem to the transgenders.(FIGURE 16) Male respondents who are postgraduate and female respondents who have completed their undergraduate have rated 4 which indicates that that most of the transgender faces unemployment, still in major areas people are not preferred to employ a transgender which creates a major problem to the transgenders.(FIGURE 17) Female

respondents who have completed their undergraduate and higher secondary education and respondents belonging to the category of prefer no to say have rated 3 which indicates that lack of education facilities is one of the major problems faced by the transgenders.(FIGURE 18)Female respondents under the age groups of 30-40 have rated 5 which shows that lack of educational facilities is one of the major problems faced by transgender people in India.(FIGURE 19)Female respondents between the age groups of 18-30 and male respondents and respondents belonging to the category of prefer not to say between the age groups of 30-40 have rated 5 which indicates that most of the respondents face this issue which is lack of access to bathrooms is the most essential problem faced by them .(FIGURE 20)Both the female respondents and respondents belonging to the prefer not to say category who are illiterates have rated 5 which indicates that most of the respondents face this issue which is lack of access to bathrooms is the most essential problem faced by them .The pearson chi square value is 0.004 which is apparently is less than 0.05 respondents who are male agree that of problems faced by the transgender's in India . (Homelessness).

DISCUSSION:

(FIGURE 1&2)Out of 520 respondents 200 belong to females , 300 are male and others belong to prefer not to say.(FIGURE 3&4)Out of 520 respondents , 50 are below 18 , 200 belong to the age groups of 18-30, 100 belong to the age groups of 30-40 and 40-50 and 50 respondents between the age groups of 50-60 and remaining are above 60.(FIGURE 5&6)Out of 520 respondents ,50 respondents are students, 150 respondents are under the private sector, 50 respondents are under the public sector ,75 respondents and the government 90 respondents are unemployed and the remaining are doing business.(FIGURE 7&8)Out of 520 respondents 320 respondents are married and the remaining respondents are unmarried.(FIGURE 9&10)Out of 520 respondents, 243 respondents are undergraduates, 167 respondents are post graduates, 50 respondents have completed their higher secondary and 60 respondents are illiterates. In figure 11, female respondents between the age groups of 18-30 and male respondents between the age groups of 30-40 have rated 5 which shows that homelessness is one of the major problems faced by the transgenders in India.In figure 12, female respondents who have completed their higher secondary and male respondents who have completed undergraduate and postgraduate have rated 5 which shows that homelessness is the major problem faced by the transgenders.In figure 13, female respondents who have completed their higher secondary and male

respondents who have completed their post graduates have rated 4 which indicates that lack of medical facilities doesn't create major problems upon the transgender. In figure 14, respondents who have completed their undergraduate and working in public sectors, respondents who are working in public sector and business having completed their post graduation have rated 4 which indicates that the lack of medical facilities doesn't create major problems upon the transgender. In figure 15, respondents working under government sectors and completed their undergraduate and respondents who have completed their post graduates and working in public sectors have rated 5 which indicates that most of the transgender faces unemployment, still in major areas people are not preferred to employ a transgender which creates a major problem to the transgenders. In figure 16, Male respondents who are postgraduate and female respondents who have completed their undergraduate have rated 4 which indicates that that most of the transgender faces unemployment, still in major areas people are not preferred to employ a transgender which creates a major problem to the transgenders. In figure 17, female respondents who have completed their undergraduate and higher secondary education and respondents belonging to the category of prefer no to say have rated 3 which indicates that lack of education facilities is one of the major problems faced by the transgenders. In figure 18, female respondents under the age groups of 30-40 have rated 5 which shows that lack of educational facilities is one of the major problems faced by transgender people in India. In figure 19, female respondents between the age groups of 18-30 and male respondents and respondents belonging to the category of prefer not to say between the age groups of 30-40 have rated 5 which indicates that most of the respondents face this issue which is lack of access to bathroom is the most essential problem faced by them. In figure 20, the results show that female respondents and respondents belonging to the prefer not to say category who are illiterates have rated 5 which indicates that most of the respondents face this issue which is lack of access to bathrooms is the most essential problem faced by them.

LIMITATIONS:

The major limitation of my study would be in collecting samples. Since it's a first hand study and the COVID 19 is in effect, it wasn't suitable for doing a direct survey in interview or open-ended questions to understand their view of the problems and challenges faced by the transgenders in India. Another limitation of the study is the sample size. The sample size is only 520. The sample size is not sufficient to know the opinion of the people. The age group

of above 50 opinions are very low which may affect the completeness of the survey. Most of the respondents are undergraduates and postgraduates So the majority of the opinions of the undergraduates and postgraduates are reflected in this study.

SUGGESTION:

Ambisexual people in India have been protesting against a new law that claims to cover their rights while taking away their fundamental right of equal citizenship under the constitution. I spoke to transgender people in Mumbai, asking what they stress and what could be the result. The Transgender Persons (Protection of Rights) Bill was passed in the Upper House of Indian Parliament last month and signed into an law by the chairman of India. As per the legislation, the District Magistrate and the screening- commission at the quarter position will assign a gender instrument to an existent who has experienced a coitus reassignmentsurgery. However, one can only be linked as transgender, not as manly or womanish, If one has not experienced coitus reassignment surgery. Ambisexual people believe this is pressing them into surgery whereas the demand for free or low- cost coitus reassignment surgery has also not been met. In addition to that, the provision for discipline for serious crimes committed against ambisexual people is mainly less severe than for the same crimes committed against cisgendered people. The new bill also denies reservation to transgender, intersex and gender non-conforming people, and requires them to be living with their birth families which are the point of physical and psychological violence in utmost cases.

CONCLUSION:

People who has gender identity or gender expression which differs the sex that they were assigned at birth are knows as transgenders . These people face lots of challenges and problems in society and rights are not granted to them equally . Every person in this world deserves to be respected despite any religion , caste or gender .Transgender people should also be treated equally and they should deserve all the right in the constitution as normal human rights .The Transgender Persons (Protection of Rights) Act 2019 was passed and several provisions were made in order to protect the rights of transgender people . Moreover, The Supreme Court has directed the Centre and State government to grant legal recognition of gender identity whether it be Male , female or third gender. An empirical study was carried out among the 520 respondents, the results shows that both the male and female respondents are aware about the

transgender persons protection act 2019 , the problems faced by the transgenders are homelessness, lack to access of bathroom, and unemployment and in most of devotional places and in educational institutions they still face discrimination and by using chi square analysis it was found there is significant association between the transgender being discriminated at workplace and gender of the respondents. It shows that that there is no gender based discrimination at workplace . It is suggested that more public awareness and legal measures should be initiated further by the government in order to to improve the situation and standards of transgender people.

REFERENCES:

1. .Sourav,Agarwal(2017)<http://journals.christuniversity.in/index.php/culj/article/download/995/755/2062>.
2. AkankshaMishra(2016)[https://www.worldwidejournals.com/indian-journal-of-applied-research-\(IJAR\)/recent_issues_pdf/2015/September/September_2015_1492523553__40.pdf](https://www.worldwidejournals.com/indian-journal-of-applied-research-(IJAR)/recent_issues_pdf/2015/September/September_2015_1492523553__40.pdf).
3. Swarupa Deb (2016)http://www.journalijar.com/uploads/425_aneesh.pdf.
4. KimberlyTower(2016)<http://euroasiapub.org/wp-content/uploads/2016/12/2ESSNov-4296.pdf>.
5. Dr.A.Balu (2020)<https://core.ac.uk/download/pdf/233615349.pdf>.
6. Aneesh(2016)<https://www.tandfonline.com/doi/abs/10.1080/01634370802609056>.
7. Dr.KalpanaV,Jawale(2016)<https://www.allresearchjournal.com/archives/2016/vol2issue6/PartG/2-4-128-110.pdf>.
8. Jeyaseelan.M(2015)http://www.shanlaxjournals.in/pdf/ASH/V4N1/Ash_V4_N1_007.pdf.
9. P.Vimala,S.VanajaKumari(2016)<https://www.ijcmph.com/index.php/ijcmph/article/viewFile/2490/1867>.
10. Redding, Jeffrey A. 2019. “The Pakistan Transgender Persons (Protection of Rights) Act of 2018 and Its Impact on the Law of Gender in Pakistan,” November. <https://papers.ssrn.com/abstract=3490418>.
11. Jennifer zing Loh (2018)“SAGE Journals: Your Gateway to World-Class Research Journals.” n.d. Accessed March 22, 2021. <https://journals.sagepub.com/action/cookieAbsent>.