



INTERNATIONAL JOURNAL FOR LEGAL RESEARCH AND ANALYSIS

Open Access, Refereed Journal Multi Disciplinary
Peer Reviewed Edition :

www.ijlra.com

DISCLAIMER

No part of this publication may be reproduced or copied in any form by any means without prior written permission of Managing Editor of IJLRA. The views expressed in this publication are purely personal opinions of the authors and do not reflect the views of the Editorial Team of IJLRA.

Though every effort has been made to ensure that the information in Volume 2 Issue 7 is accurate and appropriately cited/referenced, neither the Editorial Board nor IJLRA shall be held liable or responsible in any manner whatsoever for any consequences for any action taken by anyone on the basis of information in the Journal.

Copyright © International Journal for Legal Research & Analysis

IJLRA

EDITORIAL TEAM

EDITORS



Megha Middha

Megha Middha, Assistant Professor of Law in Mody University of Science and Technology, Lakshmangarh, Sikar

Megha Middha, is working as an Assistant Professor of Law in Mody University of Science and Technology, Lakshmangarh, Sikar (Rajasthan). She has an experience in the teaching of almost 3 years. She has completed her graduation in BBA LL.B (H) from Amity University, Rajasthan (Gold Medalist) and did her post-graduation (LL.M in Business Laws) from NLSIU, Bengaluru. Currently, she is enrolled in a Ph.D. course in the Department of Law at Mohanlal Sukhadia University, Udaipur (Rajasthan). She wishes to excel in academics and research and contribute as much as she can to society. Through her interactions with the students, she tries to inculcate a sense of deep thinking power in her students and enlighten and guide them to the fact how they can bring a change to the society

Dr. Samrat Datta

Dr. Samrat Datta Seedling School of Law and Governance, Jaipur National University, Jaipur. Dr. Samrat Datta is currently associated with Seedling School of Law and Governance, Jaipur National University, Jaipur. Dr. Datta has completed his graduation i.e., B.A.LL.B. from Law College Dehradun, Hemvati Nandan Bahuguna Garhwal University, Srinagar, Uttarakhand. He is an alumnus of KIIT University, Bhubaneswar where he pursued his post-graduation (LL.M.) in Criminal Law and subsequently completed his Ph.D. in Police Law and Information Technology from the Pacific Academy of Higher Education and Research University, Udaipur in 2020. His area of interest and research is Criminal and Police Law. Dr. Datta has a teaching experience of 7 years in various law schools across North India and has held administrative positions like Academic Coordinator, Centre Superintendent for Examinations, Deputy Controller of Examinations, Member of the Proctorial Board



Dr. Namita Jain



Head & Associate Professor

School of Law, JECRC University, Jaipur Ph.D. (Commercial Law) LL.M., UGC -NET Post Graduation Diploma in Taxation law and Practice, Bachelor of Commerce.

Teaching Experience: 12 years, AWARDS AND RECOGNITION of Dr. Namita Jain are - ICF Global Excellence Award 2020 in the category of educationalist by I Can Foundation, India. India Women Empowerment Award in the category of "Emerging Excellence in Academics by Prime Time & Utkrisht Bharat Foundation, New Delhi.(2020). Conferred in FL Book of Top 21 Record Holders in the category of education by Fashion Lifestyle Magazine, New Delhi. (2020). Certificate of Appreciation for organizing and managing the Professional Development Training Program on IPR in Collaboration with Trade Innovations Services, Jaipur on March 14th, 2019

Mrs.S.Kalpana

Assistant professor of Law

Mrs.S.Kalpana, presently Assistant professor of Law, VelTech Rangarajan Dr. Sagunthala R & D Institute of Science and Technology, Avadi. Formerly Assistant professor of Law, Vels University in the year 2019 to 2020, Worked as Guest Faculty, Chennai Dr.Ambedkar Law College, Pudupakkam. Published one book. Published 8 Articles in various reputed Law Journals. Conducted 1 Moot court competition and participated in nearly 80 National and International seminars and webinars conducted on various subjects of Law. Did ML in Criminal Law and Criminal Justice Administration. 10 paper presentations in various National and International seminars. Attended more than 10 FDP programs. Ph.D. in Law pursuing.



Avinash Kumar



Avinash Kumar has completed his Ph.D. in International Investment Law from the Dept. of Law & Governance, Central University of South Bihar. His research work is on "International Investment Agreement and State's right to regulate Foreign Investment." He qualified UGC-NET and has been selected for the prestigious ICSSR Doctoral Fellowship. He is an alumnus of the Faculty of Law, University of Delhi. Formerly he has been elected as Students Union President of Law Centre-1, University of Delhi. Moreover, he completed his LL.M. from the University of Delhi (2014-16), dissertation on "Cross-border Merger & Acquisition"; LL.B. from the University of Delhi (2011-14), and B.A. (Hons.) from Maharaja Agrasen College, University of Delhi. He has also obtained P.G. Diploma in IPR from the Indian Society of International Law, New Delhi. He has qualified UGC - NET examination and has been awarded ICSSR - Doctoral Fellowship. He has published six-plus articles and presented 9 plus papers in national and international seminars/conferences. He participated in several workshops on research methodology and teaching and learning.

ABOUT US

INTERNATIONAL JOURNAL FOR LEGAL RESEARCH & ANALYSIS
ISSN

2582-6433 is an Online Journal is Monthly, Peer Review, Academic Journal, Published online, that seeks to provide an interactive platform for the publication of Short Articles, Long Articles, Book Review, Case Comments, Research Papers, Essay in the field of Law & Multidisciplinary issue. Our aim is to upgrade the level of interaction and discourse about contemporary issues of law. We are eager to become a highly cited academic publication, through quality contributions from students, academics, professionals from the industry, the bar and the bench. INTERNATIONAL JOURNAL FOR LEGAL RESEARCH & ANALYSIS ISSN 2582-6433 welcomes contributions from all legal branches, as long as the work is original, unpublished and is in consonance with the submission guidelines.

EVALUATION OF THE EVOLUTION OF HINDU ADOPTION LAWS IN INDIA: ADDRESSING SOCIETAL CHALLENGES FACED BY THE LGBTQIA+ COMMUNITY

AUTHORED BY - SHWETA SABUJI

ABSTRACT

Adoption in India has taken a radical turn, reflecting changes in child welfare policies and the evolution of social values against the backdrop of a world experiencing rapid change. The goal of this study is to clarify the complexities surrounding adoption laws in India by painstakingly charting their historical development and highlighting current issues. This study aims to fill in the gaps in the literature on adoption legislation in India and highlights the ongoing relationship between social and economic injustices and the adoption process. It focuses on incidents involving members of the LGBTQIA+ community in particular, exposing persistent discriminatory behaviors in spite of legislative advancements acknowledging LGBTQIA+ relationships. Moreover, by conducting a thorough evaluation of research papers, surveys, journals, and articles, this study aims to resolve these difficulties. The study envisions a shift in societal perspectives and other consequential changes that could potentially redefine adoption practices and norms. Researchers, students, and instructors stand to gain from the insights produced, which will also be of great use to legislators, attorneys, and advocates working in the adoption law sector. By means of this comprehensive analysis, the research endeavors to develop a sophisticated comprehension of adoption procedures in India, establishing the foundation for knowledgeable discussions and possible modifications in the adoption domain.

KEYWORDS: *Adoption, Best Interest, LGBTQIA+, Legislations*

I. INTRODUCTION

Hindu mythology states that an only male can be adopted to uphold the family line and perform funeral ceremonies. Not even the Dharmasastras address the conditions for adopting infants who are male. In the past, adoption was done mostly for temporal and spiritual reasons, but it is now also done to satisfy the emotional and parental needs of the adopters. In ancient India, family members were seen as the most important witnesses to the adoption, hence it was imperative that they be invited to the ritual (Dattahoma). As per Smrtikaras, in the event that a person adopts a kid, the child would be the heir or the authority over all inherited property, even if a male child is born after the adoption.

Hindus have always developed adoption because of the emphasis they place on a male child. Hindu scriptures state that each person should have their own natural child; if not, they are permitted to have another child. It was considered that the sole representation of a male in historical events was a natural-born child, and accepting a secondary son through adoption was completely wrong. Hindu scriptures, therefore, never acknowledged as genuine any son who was not also a man's natural son. Adoption of women was not accepted in early Hindu thinking. Proof of this can be found in the scriptures, which prohibit a woman or a daughter from reading passages from sacred books or officiating at a man's burial. It was believed that a female newborn could neither save the dead from hell nor deliver them from the agony of the afterlife.

II. LITERATURE REVIEW EVOLUTION OF ADOPTION RIGHTS IN INDIA

The historical and evolutionary process produced the adoption laws in India that exist now. It has lived in three different historical periods: the Ancient, British, and Post-Independence periods. Adoption regulations are influenced greatly by historical periods. Ancient Hindu texts such as the Mahabharata and the Ramayana have references to adoption, where saints and royals made the adoption. Adoption served two purposes in ancient India: it was used to carry on the father's lineage and to carry out funeral customs.¹ Hindu scriptures hold that a son's performance of the funeral rites is the sole way for a father who has passed away to find redemption.² Because of the significance placed on the son, it was customary in the past to adopt a son in the event that a natural

¹ Niraj Meena, "Adoption Laws in India: Challenging Existing Law", 2020

² Akshita Prasad & Kunal Nema, "Child Adoption in India: A Comprehensive Study", September 25, 2019

child could not be born.³

Scriptures ruled adoptions in ancient India; there were no codified rules governing adoptions. The Privy Council was asked to interpret authoritative Hindu texts during the British rule. The adoption rules of today are clearly influenced by many Privy Council rulings, which also formed the framework for Hindu adoption regulations.⁴ The Hindu Adoption and Maintenance Act, 1956 was one of the four sections of the Hindu Code Bill that the Sir B.N. Rao Committee presented to Parliament during the post-independence era. Consequently, the Hindu Codified Adoption rules are established. Families and willing individuals have been dissatisfied due to the lack of general adoption rules. The Adoption of Children's Bill, the first effort at a secular law, was introduced in 1972 and was met with resistance by the Rajya Sabha Muslim committee.

A different measure that had a section declaring that it did not apply to Muslims was introduced in the Lok Sabha in 1980, but it was eventually abandoned. The landmark case of Lakshi Kant Pandey⁵ laid the groundwork for secular adoption legislation and resulted in the departure of adoption from religious principles in order to safeguard the child's best interests. The fact that LGBTQ individuals and couples are not mentioned in relation to adoption rights in India is clear from the foregoing.⁶ The criminalization of homosexuality under Section 377 of the Indian Penal Code may have been the cause of this exclusion both before and after independence.

A family is the fundamental unit of society. Children bring the family line forward. If the couple is childless after a longer delay, they would choose adoption. Therefore, adopting a child is the procedure by which someone takes on the role of parent. Adoption is a global phenomenon that has taken different forms in India throughout history and continues to do so now. Adoption's primary motivation is to carry on the gene pool. Hindu jurisprudence states that adoption has been accepted in one way or another from the Vedic era until the present. Adoption was formerly viewed as a sacramental act. However, with the passage of the Hindu Maintenance and Adoption Act, 1956, all religious and sacramental overtones were eliminated, leaving adoption as a secular

³ Saras Bhaskar & R.A.C. Hoksbergen & Anneloes Van Baar & Subhasini Motiram, "Adoption in India- The Past, Present and Future Trends", December, 2012

⁴ Karuna Devi, "Adoption in India _ a critical study with special reference to abandoned children in the state of Punjab Haryana and Himachal Pradesh", 2007

⁵ 1984(2) SCC 244

⁶ Law Commission of India, Reforms on Family Law, 2018

institution and act. Adoption is among the legal fictions that have been utilized to further personal interests. In general, heterosexual couples are thought of when we think about adoption; but, as society advances and people learn more about one another and about the nature of themselves, they are growing increasingly self-aware and no longer fearful of society. Family ties don't always have to be with our biological relatives. Even though it is still illegal for same-sex couples to marry in many states across the nation, the majority of them continue to live together and create bonds akin to marriage. The next stage of marriage is to share their love with their offspring.

III. ANALYSIS

THE LEGAL IMPEDIMENTS IN LGBTQ ADOPTION RIGHTS

1. HINDU ADOPTION AND MAINTENANCE ACT 1956

The only codified personal law in India that addresses the ability to adopt, the ability to give adoption, and the consequences of adoption is the Hindu Adoption and Maintenance Act, 1956 (HAMA). The HAMA's Sections 7⁷, 8⁸, and 11⁹, when read together, address the eligibility and terms of adoption for Hindu men and women. The terms "husband" and "wife," as used explicitly in Sections 7 and 8 of the HAMA, suggest that adoption of children is restricted to heterosexual couples. The act says nothing about "third gender" adoption rights. A cursory reading of the Act makes it clear that it is based on a binary conception of gender. HAMA permits LGBTQ adoptions from single parents.

Adoption by a single parent has distinct legal implications, nevertheless. Adopting a child from abroad could, in a sense, legally require a single parent to provide for the needs of the adopted child. Additionally, one of the spouses of a same-sex couple would have to give up their adoption rights in a single-parent adoption. Additionally, HAMA is ill-equipped to deal with the complications that arise from transgender patients' sex-reassignment surgery. Consider a scenario in which a woman adopts a girl, and the adopted child and the prospective parent are not 21 years apart in age. Should this woman undergo sex-reassignment surgery and transform into a boy. Therefore, it violates HAMA's Section 11, which stipulates that there must be a minimum of 21 years of separation between the father and the adopted daughter. Additionally, Section 5 (1), which specifies that

⁷ The Hindu Adoption and Maintenance Act, 1956, s. 7

⁸ The Hindu Adoption and Maintenance Act, 1956, s. 8

⁹ The Hindu Adoption and Maintenance Act, 1956, s. 11

"any adoption made in contravention of the said provisions shall be void," declares that the adoption is null and void. The explanation above makes it clear that the adoption provisions of the HAMA are discriminatory and cause various legal barriers for LGBTQ individuals and couples seeking to adopt.

2. JUVENILE JUSTICE CARE AND PROTECTION ACT 2000

The first secular law addressing adoption was the Juvenile Justice (Care and Protection of Children) Act of 2000. It acknowledges adoption as a means of assisting in the child's rehabilitation. The Juvenile Justice (Care and Protection of Children) Act, 2015 (JJ Act, 2015) eliminated the previous Act. The JJ Act of 2015 established a comprehensive framework for adoption. It describes adoption as the legal procedure by which an adopted child becomes the lawful child of his adoptive parents, with all the rights, obligations, and privileges associated with a biological child, and is permanently separated from his biological parents.¹⁰

This statute established the Central Adoption Resource Authority (CARA), which serves as the supreme authority for all secular intra- and inter-national adoption. The Guidelines Governing Adoption of Children, 2015 have been superseded by the Adoption Regulations 2017, which are formulated under section 68(c) of the JJ Act 2015. The Adoption Regulation 2017's Section 5 outlines the requirements for potential adoptive parents to be eligible. Adoption is permitted under Section 5(2) regardless of marital status, meaning that single parents may adopt, but married couples must obtain the consent of both spouses in order to adopt.

Since same-sex weddings are not recognized in India, same-sex couples would essentially be classified as unmarried couples. Recently, CARA has regulated the possibility of live-in partners becoming potential adoptive parents on an individual basis.¹¹

It is safe to assume that the authorities would reject the request of same-sex couples, nevertheless, as there is no explicit directive about whether or not they can profit from this circular. Additionally, many documents under the 2017 Adoption Regulations employ the terms "prospective adoptive mother" and "prospective adoptive father" in the case of a "couple," indicating that homosexual

¹⁰ The Juvenile Justice (Care and Protection of Children) Act, 2015, § 2 (2)

¹¹ Central Adoption Resource Authority, Circular, "Reconsideration of decision to allow single PAPs in live-in relationship", CARA-ICA012/3/2017

couples are not permitted to adopt together. There is ambiguity surrounding third gender adoption rights because the online Registration form for prospective parents under Schedule VI only includes sections for male and female applicants, and neither the form nor the adoption regulations address the third gender. Complexities akin to those found in the HAMA may potentially emerge in the JJ Act from a prospective parent's sex-reassignment operation. The Law Commission of India has strongly recommended in their consultation paper that the term "parents" be used in place of "mother and father" in adoption provisions under the JJ Act and adoption regulations in order to enable individuals of all gender identities to benefit from the Act and overcome its discriminatory nature.

According to the Apex Court, constitutional morality encompasses a wide range of values, such as fostering an open and pluralistic society, and goes beyond simply adhering to the fundamental tenets of constitutionalism or reading the constitution literally. The Court also issued a warning to other Indian courts, warning them against conflating popular mood at a certain period of time with constitutional morality. It is important to keep in mind that the Indian constitution is a living, breathing document that can change to meet the demands of the times and reflect social advancements.

The historic cases of Navtej Singh Johar (Supra) and NALSA (Supra) demonstrate how society has evolved to embrace homosexuality. Equal adoption rights must not be denied to the LGBTQ community under the guise of societal morality. The constitutional court owes it to the LGBTQ community to defend their right to adoption given the discriminatory nature of India's adoption regulations.

INVOCATION ARTICLE 14 OF THE INDIAN CONSTITUTION

"The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India," reads Article 14 of the Indian Constitution. In India, equality entails that each individual should have equal access to all freedoms and rights. The Supreme Court's erudite judges ruled in NALSA v. Union of India³⁶ that the term "*person*" in Article 14 of the Constitution includes Hijaras and transgender people, and as such, they are entitled to the same civil and citizenship rights as other citizens of this nation.¹² As a result, the LGBTQ community

¹² (2014) 5 SCC 438

is entitled to equal civil rights, such as the ability to adopt children and be married. *"The primary task of the Court to achieve substantive equality is to determine whether the provision contributes to the subordination of a disadvantaged group of individuals,"* the Apex Court declared in Joseph Shine Supra. It is clear from examining India's adoption laws that there is no substantive equality and that certain regulations further marginalize LGBTQ individuals and couples.

The adoption laws do not clearly distinguish between heterosexual and homosexual couples when it comes to adoption rights; that is, heterosexual couples are granted joint adoption rights while homosexual couples are not. This is evident when we examine the adoption laws from the perspective of the test of reasonable classification³. Furthermore, the state's intentions behind this designation are not at all clear. One could argue that this designation is appropriate before 2018 because homosexuality was illegal. Nonetheless, this line of reasoning is inappropriate in the current situation. Studies have also demonstrated that homosexuality is just as natural as heterosexuality and that homosexual parents can raise their children to be just like heterosexual parents without having any negative effects on gender norms, sexual orientation, or other aspects of life.¹³ Therefore, there is no justification for the LGBTQ community's exclusion, and doing so would be against the fundamental right to equality guaranteed by Article 14 of the Constitution. Thus, LGBTQ persons and couples should have equal rights to adoption.

"The State shall not discriminate against any citizen on grounds only of religion, race, caste, sex, place of birth, or any of them," reads Article 15 (1) of the Indian Constitution. In NALSA Supra, the Supreme Court ruled that discrimination based on sexual orientation and gender identity must be included in the larger definition of "sex." Adoption laws in India discriminate against the LGBTQ people on the basis of their sexual orientation and gender identity. Due to the fact that this discrimination is based on and reinforces negative preconceptions about the LGBTQ community, which is defined by the category of "sex" that is prohibited by Article 15(1), it will not withstand constitutional scrutiny.

Thus, Article 15 of the Constitution has been clearly violated. It's important to remember that Article 15's goal is to provide protection to individuals who have historically faced disadvantages in their political, social, or economic lives. There is ample evidence to demonstrate the extent of

¹³ Charlotte J. Patterson, "Lesbian & Gay Parenting, American Psychological Association", 2005

prejudice experienced by members of the LGBTQ community. In light of this, adoption laws in India need to be changed to guarantee equitable adoption rights for people of all gender identities.

"No person shall be deprived of his life or personal liberty except according to the procedure established by law," reads Article 21 of the Indian Constitution. The Indian constitution's core is found in Article 21, which forbids the State from removing any rights guaranteed by it.

the Supreme Court ruled in the NALSA case. Article 21 safeguards individual liberty, privacy rights, and the dignity of human life. Family is seen as the fundamental social unit and an essential part of an individual's existence, and everyone has the right to reside with the family of their choosing.

The State has a duty to defend its citizens' rights to a family. It is arguable that having children is one of the things that gives a person's life purpose and that children are an essential component of the family. Adoption is one of the techniques used by individuals and couples who are unable to produce children of their own. In another ruling, the Bombay High Court maintained that the ability to adopt is a component of the right to life guaranteed by Article 21.

In *M/S Shabnam Hashmi v. Union of India & Ors*¹⁴, the Supreme Court acknowledged that the right to adopt could be elevated to a basic right at the appropriate moment in the future, but it declined to do so and instead highlighted the circumstances that existed at the time. Given the current situation and the fact that Indian courts are moving toward a more right-based interpretation of the law, one could argue that the time has come to recognize adoption rights as fundamental rights. The right to privacy is considered a basic right by the Apex Court in the case of *Justice Puttuswamy*¹⁵. The Court goes on to say that maintaining intimate relationships, the sanctity of marriage, family life, procreation, the home, and sexual orientation are all included in the definition of privacy. Because the right to adopt is strongly related to the purity of the LGBTQ community's family life, denying the LGBTQ community this right would amount to interfering with their right to private. As the explanation above makes clear, the "right to adopt" is a crucial component of the right to life, and denying the LGBTQ community this right would be against Article 21 of the Constitution.

¹⁴ *M/S Shabnam Hashmi vs Union of India & Ors*, (2014) 4 SCC 1

¹⁵ (2018) 1 SCC 791

BEST INTEREST OF THE CHILD

In order to ensure that a child's basic needs, identity, social well-being, and physical, emotional, and intellectual development are met, Section 2(9) of the JJ Act, 2015 states that any decision made regarding the child must be made with the child's best interests in mind. It is crucial for a child's harmonious development to grow up in a family setting where there is joy, love, and understanding. The child's initial socialization is the responsibility of the family. Given the significance of family, UNICEF declares that "*An appropriate alternative family environment should be sought in preference to institutional care, which should be used only as a last resort and as a temporary measure for children who cannot be raised by their own families.*" Therefore, before placing orphaned, abandoned, and surrendered children in a child care facility, every avenue for securing a home must be investigated in the kid's best interest. Research has additionally demonstrated that homosexual parents are just as capable of raising a child as their heterosexual counterparts. Joint adoption rights are also crucial since they allow both parents to be held accountable for a child's upbringing and safety. Preventing members of the LGBTQ community from being eligible to adopt children will therefore deprive them of possible adoptive parents, and this cannot be justified on the grounds of the child's best interests. Allowing the LGBTQ community to adopt children will undoubtedly have a favorable impact on the annual adoption rate.

IV. CONCLUSION

Article 14, Article 15, and Article 21 of the Indian Constitution are violated by the discriminatory adoption laws in India. As Indian citizens, LGBTQ couples and individuals should have equal rights in the social, political, and economic spheres. We can therefore contend that the moment has come to recognize the right to adopt as a basic right, as evidenced by the Supreme Court's decision to adopt a more right-based approach to interpreting statutes. The right to live is inextricably linked to the right to procreate. If anyone is capable of caring for children, they should all have equal rights when it comes to adoption. Equal adoption rights would encourage adoption and provide more orphans with a secure environment in which to grow; as a result, they would be in the best interests of the kid. It is imperative that the Indian parliament take action to guarantee the LGBTQ community's equal adoption rights, just like the parliament of the United Kingdom, or that the judiciary guarantee the LGBTQ community's equal adoption rights, just like the judiciaries of the United States and South Africa.

Encouraging LGBTQ individuals and couples to adopt will advance the values entrenched in the Indian Constitution.

V. REFERENCES

1. Ananthalakshmi. Child Adoption and Thereafter: A Psycho-Analytical Study, 2001.
2. Bajpai, Asha. Child Rights in India: Law, Policy, and Practice. Oxford University Press, 2018.
3. Bhargava, Vinita. Adoption in India: Policies and Experiences. SAGE, 2005.
4. Biswas-Diener, Robert. Positive Psychology as Social Change. Springer Science & Business Media, 2011.
5. Dudley, William. Issues in Adoption. Greenhaven Pr, 2004.
6. Friesendorf, Cornelius. Strategies Against Human Trafficking: The Role of the Security Sector. 2009.
7. Mayne, John Dawson. A Treatise on Hindu Law and Usage, 1878.
8. National Academies of Sciences, Engineering, and Medicine, et al. Parenting Matters: Supporting Parents of Children Ages 0-8. National Academies Press, 2016.
9. "Parental Contact with Children Fostered and in Residential Care after the Children Act 1989." British Journal of Social Work, 1995. doi:10.1093/oxfordjournals.bjsw.a056185.
10. "Prevention Is Still the Best Medicine: „Child Health Day“ Finds Utah Kids Healthy, But Could Be Better." Psyc EXTRA Dataset, 2007. doi:10.1037/e548012009-001.
11. Stoll, Jane. Surrogacy Arrangements and Legal Parenthood: Swedish Law in a Comparative Context, 2013.
12. Thukral, Enakshi Ganguly, Bharti Ali. Status of Children in India Inc. HAQ Centre for Child Rights, 2005.
13. Tolfree, David. Roofs and Roots: The Care of Separated Children in the Developing World, 1995.
14. Dr. d Lakshmi T, Rajeshkumar S. "In Vitro Evaluation of Anticariogenic Activity of Acacia Catechu against Selected Microbes", International Research Journal of Multidisciplinary Science & Technology, 2018:3:3:20- 25

15. Trishala A, Lakshmi T, Rajeshkumar S. “Physicochemical profile of Acacia catechu bark extract -An In vitro study”, International Research Journal of Multidisciplinary Science & Technology,2018:3:4:26-30.

