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**Challenge of Transgender Involvement in Labor Force: A Comparative
Analysis between Hungary and Bangladesh**

M. M. Abdulla Al Mamun Sony

Dr. Sipka Péter



University of Debrecen
Marton Géza Doctoral School of Legal Studies

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**Challenge of Transgender Involvement in Labor Force: A
Comparative Analysis between Hungary and Bangladesh**

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Submitted by

M. M. Abdulla Al Mamun Sony
Doctoral Student
Season 2021-2022
Géza Marton Doctoral School of Legal Studies
University of Debrecen
Debrecen, Hungary

Supervised by

Dr. Sipka Péter
Assistant Professor
Department of Civil Law
University of Debrecen
Debrecen, Hungary

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M M Abdullah Al Mamun Sony

*Marton Géza Doctoral School of Legal Studies University
of Debrecen*

Subject: Recommendation letter

Dear Members of the Doctoral School Council,

I am pleased to provide my supervisor's recommendation regarding the doctoral dissertation of **M. M. Abdulla Al Mamun Sony**, titled "*Challenge of Transgender Involvement in the Labor Force: A Comparative Analysis between Hungary and Bangladesh*".

As the supervisor of the doctoral candidate, I confirm that the submitted dissertation represents independent, rigorous, and scientifically grounded research. The work addresses a complex both legally and socially relevant issue: the systemic obstacles transgender individuals face in entering and remaining in the labour market, examined through a cross-cultural comparison of Hungary and Bangladesh.

The dissertation integrates legal analysis with empirical qualitative research and provides a coherent socio-legal framework that reflects scholarly depth and methodological maturity. The candidate demonstrates the ability to work with international, European, and national legal sources, while also drawing on extensive field research, thus ensuring that the final text is balanced, well-founded, and academically robust.

The overall structure and argumentation of the dissertation reveal a clear central hypothesis. The candidate posits that despite the significant differences between Hungary and Bangladesh in terms of legal development, political context, and socio-economic conditions, transgender individuals in both countries face comparable forms of exclusion from the labour market. According to the hypothesis, legal recognition or the existence of statutory anti-discrimination rules alone does not guarantee substantive equality or meaningful participation in employment. Rather, the decisive factors are the societal attitudes, institutional practices, and the extent to which the law is actually implemented and enforced. The dissertation argues that the mere presence of legal frameworks—whether in the form of EU-level guarantees in Hungary or transgender recognition in Bangladesh—remains insufficient if not accompanied by structural support mechanisms, awareness-raising, and effective enforcement.

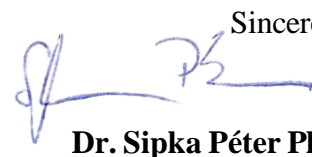
The empirical results strongly support this theoretical position. The interviews conducted with transgender individuals from both countries illustrate that exclusion from formal employment is not simply a legal issue but a multi-layered social reality. Respondents from both jurisdictions described significant barriers during job search, including the reluctance of employers to hire transgender individuals, persistent stereotypes, and the absence of inclusive workplace environments. Many interviewees detailed personal experiences of harassment, misunderstanding, or social isolation in the workplace, which often discouraged them from

maintaining formal employment relationships. Despite Hungary's more elaborate legal framework, respondents frequently reported that the law does not sufficiently protect them in practice, especially in light of recent political developments concerning gender recognition. Similarly, in Bangladesh, although the third-gender status has been legally recognised, its practical effects remain extremely limited; social stigma and institutional neglect continue to define the employment prospects of transgender individuals.

After the home defence, Mr. Sony added some relevant legal part to the paper. As a result of this, the dissertation demonstrates that international legal instruments play an important normative role but have little direct impact on everyday employment experiences. In both countries, the gap between legal commitments and lived realities remains wide. The comparative analysis shows that the structural causes of exclusion are deeply embedded in social perceptions, institutional routines, and long-standing cultural norms. Through its findings, the dissertation makes a significant scholarly contribution: it highlights that substantive labour market inclusion cannot be achieved by legal reforms alone but requires coordinated social, educational, and organisational changes as well.

I would also like to emphasize that following the successful home defence, the doctoral candidate carefully revised and improved the dissertation based on the opponents' comments. These revisions strengthened the theoretical and legal chapters, clarified several conceptual points, and provided more comprehensive analysis in the sections addressing international and national legal frameworks. The candidate also extended the legal discussion to improve coherence with the empirical findings, thereby raising the overall academic quality of the final text.

With these modifications now completed, I consider the dissertation to be scientifically sound, methodologically consistent, and fully compliant with the expectations of the doctoral programme. The submitted work is ready for public defence, and I recommend it to the Doctoral School with full confidence.

Sincerely,

Dr. Sipka Péter PhD.

Supervisor
University of Debrecen, Faculty of Law

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1 Introduction

1.1 Background of the Study

The struggle for transgender rights and inclusion in the labor market remains one of the most pressing issues in contemporary human rights discussions. Non-binary individuals worldwide face discrimination, marginalization, and systemic exclusion, especially in the workplace. These barriers arise from a combination of legal, social, and cultural factors that continue to hinder transgender people's ability to participate equally in society, particularly in employment (Aksoy et al., 2024; Akter & Saha, 2024; Al-Mamun et al., 2022; Hossain, 2017). The importance of understanding these challenges is underscored by the urgent need for policy reforms and social change that can ensure equal opportunities for transgender people (Al-Mamun et al., 2022). Based on such background, through the use of a comparative analysis between Hungary and Bangladesh, this study investigates the particular problems that transgender persons encounter while attempting to find employment. Both nations have diverse socio-political settings and take distinctive approaches to transgender rights. As a result, they are intriguing case studies for analyzing the ways in which national policies, legal frameworks, and cultural views influence the employment experiences of transgender persons.

For an extended period, Hungary, a member of the European Union, has been acknowledged for its progressive policies regarding non-binary gender rights. Nevertheless, the Hungarian government has adopted a more antagonistic stance toward transgender individuals in recent years (FRA, 2020a). The 2020 legal changes in Hungary, which prohibited the legal recognition of gender changes, have resulted in a substantial regressive impact on transgender rights (Barát, 2022; Gregor & Verebes, 2023). This legal change has resulted in a precarious situation for many transgender individuals in Hungary, as they are denied fundamental legal recognition and subjected to pervasive discrimination in the labor market. Transgender individuals continue to be marginalized in the labor market (Primecz & Pelyhe, 2023; Sándor, 2016), despite the legal protections against discrimination that are ubiquitous in Hungarian society, which have been further exacerbated by recent government policies (Sony, 2025). The already restricted job opportunities available to transgender individuals are further exacerbated by the discriminatory attitudes that are deeply ingrained in Hungarian society (Barát, 2022), resulting in a significant number of individuals turning to informal or precarious employment.

In contrast, Bangladesh, which has a longstanding tradition of acknowledging gender diversity through the *Hijra* community, has made significant progress in recent years in its

efforts to officially recognize the third gender (Ahmed, 2013). While transgender broadly refers to individuals whose gender identity differs from their assigned sex at birth, the third gender in South Asia—such as the Hijra community in Bangladesh—represents a distinct sociocultural category with unique historical, communal, and legal significance (Ahmed, 2013; Pinkey, 2019; Rahman et al., 2025). Nevertheless, transgender individuals in Bangladesh, particularly those who identify as third gender, continue to encounter substantial employment obstacles, despite this legal recognition (Aksoy et al., 2024; Akter & Saha, 2024). The formal labor market is characterized by a pervasive exclusion due to the deeply ingrained cultural and religious biases and the absence of targeted anti-discrimination laws (Akter & Saha, 2024). The majority of third gender individuals in Bangladesh are confined to low-wage, informal employment, such as soliciting or performing at social ceremonies, which provides no job security, benefits, or social mobility (Al-Mamun et al., 2022; Amanullah et al., 2022; Shah et al., 2024). The absence of access to education, vocational training, and healthcare further exacerbates these systemic barriers, further restricting transgender people’s ability to achieve financial independence and social inclusion.

The intersection of legal recognition, societal acceptance, and employment opportunities for transgender individuals is examined through the comparative analysis of Hungary and Bangladesh, which provides a valuable perspective. This study will examine the ways in which the public’s perceptions of transgender individuals and their participation in the labor force are influenced by the national legislative frameworks of both countries. Additionally, it will investigate the role of international legal instruments, including those established by the International Labor Organization (ILO), in the advancement of labor inclusion and transgender rights. The aim of this study is to enrich the broader discourse on transgender rights by examining the distinctive obstacles faced by these two countries. It will provide policy recommendations to improve their integration into the workforce.

In general, Hungary and Bangladesh acknowledge the existence of transgender individuals; however, the legal and social frameworks of each nation impose substantial impediments to their complete integration into the labor market. The objective of this investigation is to identify the deficiencies in the current legal frameworks, underscore the discrimination experienced by transgender individuals in both formal and informal employment sectors, and suggest practical solutions to foster a more inclusive and equitable society for transgender individuals in both countries. This research adopts a socio-legal framework that integrates legal-institutional context with qualitative empirical findings. It does not follow a doctrinal legal approach but instead seeks to examine how legal and policy

frameworks interact with transgender individuals' lived labor market experiences in Hungary and Bangladesh.

1.2 Understanding transgenders

Understanding or defining one's sex according to one's sex at birth is simple if the anatomical features follow the typical binary lines. The traditional binary lines or the binary sex opposition composed of two sexual traits are either male or female (Graves, 2019). In every culture and society, determining gender roles according to gender identity depends largely on this binary sexual presentation. Notwithstanding that, naturally, some people are born with two sexual organs or grow up not conforming to their sexual orientation. In such cases, these people are known as transgender. The American Psychological Association (APA) (2015) defines "Transgender and gender nonconforming (TGNC) people are those who have a gender identity that is not fully aligned with their sex assigned at birth" (p. 832).

Similarly, in the field of sociology, transgender has been considered an umbrella term and is used to indicate people whose gender identity does not correlate with the sex category to which they have given birth (Schilt & Lagos, 2017; Serano, 2013). At the same time, in some countries, by law, instead of using the term 'transgender', new terms such as 'indeterminate/unspecified gender' have been introduced in New Zealand and Germany, whereas 'other' and 'third gender' have been used in India, Bangladesh, and Pakistan to refer to the nonbinary or nonconforming gender, which holds a similar meaning as that of transgender individuals (Bochenek & Knight, 2012). Overall, in all academic spheres, "transgender" refers to people who psychologically or physically do not support their sex and gender identity, which are assigned at birth.

More recently, the term LGBTQ+ has gained popularity, but each of the alphabets represents a large group of people. For example, L indicates Lesbian, G for gay, B for bisexual, T for transgender, and Q for the queer community (Liu et al., 2019). In addition to being transgender, "LGB" depends on sexual orientation (Meier et al., 2013). APA (2015) defines sexual orientation as an "often enduring pattern of emotional, romantic and/or sexual attractions of men to women or women to men (heterosexual), of women to women or men to men (homosexual), or by men or women to both sexes (bisexual)". Simply put, "LGB" refers to an individual's sense of attraction to the same sex, which is purely psychological rather than biological. However, transgender people themselves fail to distinguish between those with a typical binary sexual orientation and those with a gendered identity. Unlike LGBTQs,

transgender individuals have relatively different gender norms in the social sphere; thus, their sexual orientation and gender identity are also distinct.

The complexity of gender identity extends beyond the binary concept of male and female, since transgender people frequently face barriers to public acceptance and legal acknowledgment. Gender identity is a very personal and diverse element of a person's existence that includes not just biological but also psychological, social, and cultural components. While some transgender persons opt to have medical operations to match their physical appearance to their gender identification, others do not, and their identities remain genuine regardless of whether they pursue such treatments.

Thus, it becomes essential to acknowledge that transgender persons may identify with a variety of gender expressions that do not adhere to standard masculine or feminine stereotypes. As a result, society's rigid classification of gender frequently leads to the marginalization of transgender persons, who face many levels of discrimination and exclusion in a variety of settings, including the labor market, healthcare, and education. Understanding and accepting transgender identities entails not just identifying a person's gender, but also acknowledging their right to live genuinely and free of discrimination or violence.

1.2.1 *Defining Transgender and Third Gender in Comparative Contexts*

Although the concept of *transgender* is widely recognized in global discourse to describe individuals whose gender identity differs from their sex assigned at birth, its meaning and social implications vary significantly across cultural and legal contexts. In South Asia, particularly in Bangladesh, the notion of gender diversity is embedded in the traditional and institutionalized identity of the *Hijra* community, which is officially recognized under the legal category of *third gender* (Arvind et al., 2022; Briere & Runtz, 2024; Chettiar, 2015). The term *Hijra* refers to a distinct sociocultural group in South Asia that exists outside the conventional male–female binary (Aziz & Azhar, 2019). Historically, *Hijras* have been identified as individuals assigned male at birth who adopt feminine gender expression and social roles, though the community also includes intersex and gender-nonconforming persons (Amanullah et al., 2022; Rahman et al., 2025). The *Hijra* identity is collective and institutionalized, characterized by communal living arrangements (*gharana*), ritual functions, and hierarchical kinship systems led by a *guru* (Hossain, 2017). Despite its official recognition as a *third gender* in Bangladesh, the *Hijra* community continues to experience social stigma, economic marginalization, and systemic exclusion from mainstream employment opportunities (Rahman et al., 2025).

In contrast, in European contexts such as Hungary, the term *transgender* is primarily understood within the frameworks of psychology, medicine, and human rights, emphasizing individual autonomy and self-defined gender identity (Trotter & Yates, 2024; Wargo, 2016). Despite these contextual and epistemological distinctions, *transgender* and *third gender* identities share an essential commonality: both challenge the conventional binary classification of male and female and represent diverse expressions of gender that exist beyond normative expectations. Both groups experience systematic marginalization, including social exclusion, stigmatization, and economic deprivation, particularly in the domain of formal employment (Akter & Saha, 2024). Therefore, in this study, the term *transgender* is employed as an overarching analytical category encompassing both *transgender* and *third gender* identities. This inclusive usage allows for a cross-cultural comparative analysis of gender nonconformity and labor force participation, while simultaneously acknowledging the unique cultural, historical, and legal dimensions that shape the lived experiences of each group.

1.3 Importance of transgender identity and study

Determining gender roles and identities thus has been a challenge since the prehistoric era (Arvind et al., 2022; Fausto-Sterling, 2018; Schilt & Lagos, 2017). In the modern era, the initial phase of gender studies involved changes in female rights as well. However, with the beginning of the postmodern era, transgender people, as a specific gender, have received increased priority not only for academics but also for those in the social sphere (Fausto-Sterling, 2018). The essence of the importance of gender identity in the social sphere is socialization, property ownership, procurement of family, community participation, education, employment, and so on (del Río-González et al., 2021; Nadler et al., 2021; Reverberi et al., 2021; Zinovyeva & Tverdstup, 2021). At large, they must conform to the responsibilities of national citizens.

However, since the beginning of the history of human civilization, these sexual minorities existed in every society and culture; before the postmodern era, these groups were unrecognized and excluded from mainstream society (Fausto-Sterling, 2018; Zimmerman & Haggerty, 2021). Nevertheless, being transgender is not a matter of welcome either in the family or in society. For instance, in a recent report from the European Union (EU), more than half of the respondents in 28 EU member states used avoid certain places or locations for fear of being assaulted, threatened or harassed because they were only transgender (FRA, 2020b). Similarly, in another study, 66% of Asian trans people who migrated to Australia did not receive proper support from their family because they were transgender (Tan et al., 2021).

Consequently, failing to gain proper gender status and identity through socialization is ignored since these people hold a specific norm (del Río-González et al., 2021).

A lack of proper socialization relatively isolates these people from the mainstream people of society (Khan et al., 2009a). These isolations can be produced and reproduced from various forms of harassment, such as hindrances to public movements. For example, the use of a public bathroom is a symbol of widespread confusion, misunderstanding, and discomfort with trans people (Arvind et al., 2022; Graves, 2019; Moretti, 2023). conducted a qualitative study Lubitow et al. (2017) and concluded that “gender minorities have unequal access to safe and accessible public transportation when harassment is widespread, normalized, and when policies prohibiting discrimination remain unenforced on urban public transit” (p.1398). According to the Survey of Safety in Public and Private Spaces (SSPPS) in Canada, these sexual minority people used to experience such violence at a very early age, and in turn, most of them have developed an addiction to using drugs and consuming alcohol (Jaffray, 2020). The results of such harassment for these groups of people produce and reproduce unequal relationships in society.

The most unequal relations between the binary sexual group and the nonbinary sexual groups usually remain to gain proper access to education, health care facilities, employment opportunities and so on. On this basis, Hatchel and Marx (2018) revealed that 72% of transgender students had been victimized in school by their peers, and the common feature of these was verbal bullying as well as emotional stress (Moran et al., 2018). In line with this view, another study Sundara (2019) reported that 56.7% of transgender students were not regular at school, although 45.8% of transgender children were not admitted to school in a state in India. A similar scenario also revealed access to health care services. For instance, in Argentina, 95% of transgender people have experienced discrimination not only from healthcare personnel but also from other patients (Socías et al., 2014). In addition, due to the lack of proper culturally competent health care providers, transgenders tend to avoid healthcare centers (Reddy, 2021). This can lead to various social and health risks, such as HIV infection (Poteat et al., 2020). Such deprivation usually leads them to be deprived of the employment sector.

An insufficient scope of involvement in employment sectors was another challenge for transgender people due to a lack of knowledge and other support. On these points, Barik and Sharma (2020) noted that lack of proper financial literacy, less provision of legal documents from the government, less spread of information, less awareness program, unfriendly staff and lack of formal employment were the basic reasons for deprivation. Even between 2012 and

2019, the discrimination faced by transgender people in the workplace increased by at least 14% (FRA, 2013, 2020b). A similar scenario has also been observed in the USA. For instance, in the workforce, according to a US transgender survey (2015), 30% of transgender professionals had been dismissed, refused a promotion, or faced some type of interpersonal discrimination (James et al., 2017). Subsequently, these people must choose begging, mugging, prostitution, and other non-prestigious activities that make them a powerless socially excluded group among society (Arvind et al., 2022; Khan et al., 2009a; Subhrajit, 2014). These situations not only isolate or exclude people from the mainstream community but also generate depression and anxiety.

Depression and anxiety are other consequences of this isolation that sometimes lead these people to commit suicide. For instance, Budge (2020) reported that approximately 40% of trans people have attempted to commit suicide once in their life. Even so, the trend of committing suicide among U.S. transgender military personnel is twice that among general personnel (Tucker, 2019). In another study, it was found that the intention to commit suicide was 7 times greater among individuals aged 18 to 45 years than among individuals in any other age group (Mak et al., 2020). The ideation of suicide was also greater among transmasculine people (4.8%) than among transfeminine people (3.0%) (Mak et al., 2020). Similarly, Puckett et al. (2019) reported fewer psychological challenges, such as depression and anxiety, among 47.1% of respondents who had high connectivity with family, friends and other community members. These findings suggest that proper social support can include these sexual minority people in mainstream society, which, to some extent, is related to their legal recognition. However, several countries over the past few decades ago have given legal recognition (Subhrajit, 2014). Nevertheless, at the same time, other countries, such as the USA and Hungary, also reduced legal rights. These situations subsequently became confused and became a subject of study.

On top of that, the discrimination against transgender individuals presents distinctive obstacles that cannot be entirely resolved by the current gender-based anti-discrimination legislation (Banik et al., 2023). Although these laws frequently emphasize the binary framework of “male” and “female,” they neglect to acknowledge the unique experiences of transgender and non-binary individuals, who suffer from exacerbated social, legal, and economic vulnerabilities (Aksoy et al., 2024). The absence of explicit provisions for gender identity in current legislation frequently leads to systemic inequalities, including unequal access to employment, healthcare, and legal protections, which exacerbates the marginalization of transgender individuals.

Consistent with this view, the purpose of this research was to show that there are two main reasons why it is essential to deal with transgender prejudice separately. First, transgender people need specific treatments because they are highly suspected to experience distinct types of bias and systemic impediments, such as harassment at work, restricted legal redress, and under recognition of their gender identity (Akter & Saha, 2024). Second, regulations could reflect modern views of diversity and inclusion by including non-binary gender-specific safeguards, which will help them progress beyond binary gender ideas (Sarah & Chellaswamy, 2025). This study, thereafter, design to address the urgent call of the literature to examine the problems with present regulations and suggests that transgender discrimination needs to be regulated as a distinct and pressing legal matter by examining the gaps in current frameworks.

1.4 Problem statement

Before the postmodern age, some unique sex groups, such as transgender individuals, which existed throughout the history of human civilization in all societies and cultures, were unidentified and were kept out of the mainstream Ferguson (2016). In the contemporary era, most countries have debated gender identity by adding the term “the third gender” to legislation. Nevertheless, unequal treatment of transgender individuals in terms of social rights and responsibilities has not yet occurred. For example, in Bangladesh and other South Asian countries, which are failing to take part in the mainstream employment sector, most transgender citizens choose begging, prostitution, and illegal activities as primary means of living (Arvind et al., 2022; Jebin, 2019).

In addition to other health crises, these communities are more likely to suffer from HIV/AIDS (Sema, 2019). Such deprivation from the labor market results in powerlessness and prestige lessness among the transgender community within society (Aksoy et al., 2024; Barát, 2022; Price et al., 2024; Primecz & Pelyhe, 2023). In addition, the lack of valid earning sources has prevented transgender people from gaining property ownership and family formation (Van Borm & Baert, 2018; Yasmeen et al., 2024). In the long run, a classless socially excluded and dependent group has arisen in Bangladesh as well as in the South Asian region; these individuals are considered to be a social burden by the mainstream community (Dutta, 2023; Khan et al., 2009b; Mount 2020; Sifat & Shafi, 2021). Consequently, the ultimate national development remains in vain, and poverty increases.

However, the central causes of this problem have vested between legal and social initiatives (Aksoy et al., 2024; Banik et al., 2023; Thiel et al., 2023). Proper legislation, such as strong nondiscriminatory labor law and its proper implication and change in social outlook,

can be a solution to this problem. For example, the legislation of the European Union allows same-sex sexual activity, recognition of same-sex unions, including same-sex marriage, adoption by same-sex couples, open military and anti-discrimination laws concerning sexual orientation, and laws concerning gender identity/expression (Barát, 2022).

Although some Central European countries, such as Hungary, constitutionally define marriage as a union between a man and a woman and restrict adoption to married heterosexual couples under Article L of the Fundamental Law (2011), and have introduced a statutory ban on legal gender recognition through Act XXX of 2020 (which amended Act I of 2010 on Civil Registry Procedures to prohibit changing the “sex at birth” on official documents), transgender individuals still face significant barriers to full participation in society, including challenges in accessing employment and equal opportunities in the labor force (Barát, 2022; Gregor & Verebes, 2023; Kollman, 2014; Oppenheim, 2018; Primecz & Pelyhe, 2023). In response to such challenges, Hungary—like many other European countries—has ratified several international human rights agreements aimed at promoting a fair and inclusive working environment. These agreements are intended to protect all individuals, including transgender people, by promoting equality and nondiscrimination in employment and broader social participation.

One of the key international instruments is the International Covenant on Economic, Social and Cultural Rights (ICESCR), which was adopted by the United Nations in 1966 and came into force in 1976. Article 6 of this covenant guarantees the right to work and emphasizes that everyone should have the opportunity to earn a living in conditions of freedom and dignity. Hungary has also adopted the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) (Huq & Rifat-Ur-Rahman, 2019). This treaty includes several articles relevant to employment and equality: Article 11 covers employment rights, Article 13 addresses economic and social rights, and Article 16(1)(h) guarantees equal rights in marriage and family life (Straube, 2020; Vida, 2019). These provisions aim to eliminate discrimination and promote equality across all aspects of life.

In addition, Hungary recognizes the Yogyakarta Principles on the Application of International Human Rights Law in Relation to Sexual Orientation and Gender Identity (2007), which are non-binding soft-law guidelines designed to inform the interpretation and implementation of international human rights standards (Nyúl, 2025). *Principle 12* of these Principles explicitly addresses the right to work, stating that everyone has the right to the opportunity to gain a living by work freely chosen or accepted, without discrimination based on sexual orientation, gender identity, or gender expression (Nyúl, 2025). Although not legally

binding, these Principles provide authoritative guidance for states and policymakers on protecting transgender and gender-diverse individuals in employment and ensuring inclusive workplaces. Together, these international commitments—ICESCR, CEDAW, and the Yogyakarta Principles—reflect Hungary’s normative responsibility to promote a nondiscriminatory working environment and to support the equal participation of transgender individuals in all areas of public and professional life.

In addition, to abolish discrimination among others based on sexual orientation or gender identity in employment, Hungary also enacted Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities and sanctioned the Labor Code (Barát, 2022; Vida, 2019). Subsequently, only 15% of transgender individuals, including LGB individuals, have been facing discrimination in the workplace according to a survey (Sándor, 2016). In 2019, another survey on LGBTQ+ issues in Hungary areas showed that approximately 23% of respondents discriminated against accessing LGBTQ+, such as through going to a café, restaurant, hospital, or shop (FRA, 2020a). Each ten-year European Union publishes a specific survey report to present the status of the LGBTQ+ community in Europe, whereas in Bangladesh and other South Asia, there is no official record published specifically presenting transgender people’s status.

Additionally, to the LGBTQ+ community, the transgender identity crisis has resolved in Bangladesh. However, the active involvement of transgender individuals in the labor force and employment sectors is not visible. Like Hungary, Bangladesh is also a CEWAD ratified country (Huq & Rifat-Ur-Rahman, 2019) and supports gender-based nondiscriminatory labor laws (Rahman, 2020). However, she cannot fulfill her mission to engage third-gender people in the active labor force. According to the latest research, 73%, 59%, 58.5%, 46.5%, 42.7%, and 34.4% of transgender people have experienced prejudice in the following areas: employment, healthcare, social/civil rights, education, and policing, respectively (Amanullah et al., 2022). According to Khan et al. (2009), this problem can be social. For instance, in contrast to the third gender view, the community people accuse them of being lazy guys of society. Moreover, from the mainstream point of view, these social groups do not want to work, so they are just a burden on society (Khan et al., 2009). Subsequently, the problem remains unsolved, and the transgender people’s suffering knows no bound (Al-Mamun et al., 2022; Sarah & Chellaswamy, 2025). Without systematic study, it is not easy to determine what type of gaps exist in policy and legislation to engage third gender in the labor force in Bangladesh.

Furthermore, research on transgender studies has gained popularity over the past few decades, and several scholars have focused on the improvement and advancement of this

community. Most of these earlier works (e.g., Ahmed (2013); Bhattacharya et al. (2022); Gressgård (2010); Sarah and Chellaswamy (2025); Sony (2024); Eliason and Schope (2007); Galupo et al. (2014); Morgan and Stevens (2012); Witten (2016); Seelman (2015); Al-Mamun et al. (2022); Dutta (2023); Mount (2020); Pinkey (2019)) both in subcontinents and Europe have tried to present the consequences of transgender people's identity crisis and how to solve it by law. In turn of their efforts today, most of the country legally recognizes transgender individuals as a particular sex. Several scholars, such as Khan et al. (2009b), have presented the discrimination scenario faced by transgender people in Bangladesh.

However, some studies (e.g., Cruikshank (2013), Ferguson (2016), Looper (2002), Nanda (1986), Arvind et al. (2022); Aziz and Azhar (2019); Dutta (2023) and so on.) have made a bridge between third gender, culture, and history and, from a historical point of view, have shown the deprivation of images of transgender individuals (Grant, Motter, et al., 2011). Some scholars (i.e., Anderson et al. (2001), Canner et al. (2018), and Maragh-Bass et al. (2017)) in the U.S. have also revealed gaps in legislation in terms of the increasing discrimination of transgender people toward proper health facilities, and another group of researchers (i.e., Burkhardt and Chambers (2003), Effrig et al. (2011) and so on) has found unequal education facilities based on sex identity. The third gender harassment scenario involving law enforcement agencies, aid givers, and the home environment has also been identified by some researchers, such as Chettiar (2015) and Seelman (2015).

In contrast, some research has shown that people with a lack of legal job opportunities for individuals of the third gender are involved in criminal activities (Sema, 2019). Similarly, Sema (2019) reported that transgender people with a lack of social engagement and employment were also engaging in prostitution, and those with a lack of formal education and proper sexual orientation were also involved in unsafe intercourse and were likely to suffer from HIV/AIDS. However, few scholars have also tried to address the discrimination against the third gender in the job sector and the laws and policies about these issues (Bender-Baird, 2011; Colvin, 2007; Koch & Bales, 2008; Lee, 2012; Mizock & Mueser, 2014; Oosterhoff & Hoang, 2018; Scott et al., 2011; Straube, 2020).

Notwithstanding the disparities in socio-cultural and legal frameworks between Hungary and Bangladesh, this study utilizes existing research to rectify notable deficiencies in the current academic literature. Prior research has extensively examined transgender issues from several viewpoints, encompassing job discrimination, societal marginalization, and the effects of policy. Nonetheless, these studies have not thoroughly investigated the employment situation of transgender individuals in Hungary and Bangladesh, nor have they adequately

addressed the deficiencies in Bangladesh's legislation and regulations that restrict transgender people's engagement in the labor market.

Despite Hungary's legal advancements in many domains (Gregor & Verebes, 2023), including anti-discrimination legislation, recent political developments and a rise in transphobic attitudes have fostered a hostile atmosphere for transgender employees. Conversely, Bangladesh's legal acknowledgment of the third gender has not been effectively converted into substantial social and economic integration (Akter & Saha, 2024). This study addresses significant gaps in scholarship by examining the job hurdles faced by transgender persons in both nations, as well as the legal and cultural obstacles hindering their full labor participation.

In Bangladesh, despite the government's recognition of transgender persons as a third gender in 2013, this admission has not been supported by enough legal or regulatory reforms to facilitate their active participation in the labor force (Aksoy et al., 2024). Transgender individuals in Bangladesh face pervasive discrimination and exclusion from official employment, compelling many to depend on low-wage, informal jobs or engage in stigmatized professions such as begging and prostitution (Akter & Saha, 2024). The situation is worsened by restricted access to education and vocational training, which further limits their capacity to get steady and decent work. Moreover, social perceptions of transgender individuals, entrenched in cultural and religious conventions, perpetuate their marginalization and obstruct their economic advancement. The deficiency of specific anti-discrimination legislation and the lack of institutional backing for transgender employees have fostered a milieu in which several transgender persons are ensnared in poverty, with no prospects for social or economic advancement.

In Hungary, although certain legal protections against discrimination exist, the recent legal and political climate has posed significant problems for transgender individuals in the labor market (Béres-Deák, 2022; FRA, 2020a; Kállai, 2020; Kováts, 2020; Sony, 2024). The 2020 legislative amendments, which prevent transgender persons from officially altering their gender on documents, have severely undermined transgender rights in Hungary (Barát, 2022). The aforementioned developments, along with the enduring cultural stigma and animosity directed at transgender individuals (Budapest Pride & Integrity Lab, 2016), especially in professional environments (Szlávi, 2022), have rendered many transgender persons susceptible to discrimination and marginalization.

Subsequently, despite the existence of national legislation ostensibly safeguarding against discrimination based on gender identity, inadequate enforcement and widespread

transphobic sentiments in both public and private sectors hinder transgender individuals from obtaining steady, official work (Barát, 2022; Béres-Deák, 2022; Gregor & Verebes, 2023; Primecz & Pelyhe, 2023; Szlávi, 2022). In this circumstance, this study will examine the intersection of legal frameworks, social attitudes, and workplace cultures that establish systemic barriers to employment for transgender individuals in Hungary and Bangladesh, with the objective of emphasizing the urgent necessity for comprehensive legal reforms and more inclusive labor policies.

Overall, this study seeks to enhance the existing research on transgender employment by examining these concerns within the unique settings of Hungary and Bangladesh to clarify the legal, cultural, and economic aspects influencing transgender individuals' access to the job market in these two nations. The research will include suggestions for potential organizational changes and social activities aimed at enhancing the integration of transgender individuals in the workforce, therefore diminishing their economic reliance and elevating their quality of life. This research will also enhance comprehension of the realities of transgender workers across various cultural contexts and contribute to the worldwide discourse on transgender rights and labor equity.

1.5 Aim and objectives of the study

This cross-cultural research project aims to explore the challenges of third-gender involvement in the labor force by comparing Hungary and Bangladesh. To achieve this broad aim, this study has structured around the following specific objectives:

- To understand the employment status of transgender people in Hungary and Bangladesh.
- To explore the influence of different national legislative movements on mainstream people's perceptions of transgender people's mainstream occupational involvement.
- To explore the consequences of different international and national legal initiatives on transgender labor status between Hungary and Bangladesh

1.6 Study Rationalities

Research on gender needs assessment in employment sectors is not new, especially in the EU. Nevertheless, like in the earlier part of the twentieth century, most related studies have also given priority to binary gender needs analysis in the employment sector. For instance, Tonoyan et al. (2020), through an empirical study, have explored gender gaps in labor market positions about the scope of women in entrepreneurship and the opportunity to establish industries in the

countries of the EU. Similarly, Alonso et al. (2017) and Boll et al. (2017) explored the significant gender-based wage gap in EU territories through comparisons between men and women. Supporting Boll et al. (2017), Beham et al. (2019) call upon policymakers' attention by presenting a serious wage gap between men and women concerning part-time jobs. Certainly, subscribing to binary sexual opposition needs these studies generally guide policymakers to overlook other genders, such as LGBTQ+, to improve legal labor architecture.

To address the abovementioned gaps, Lloren and Parini (2017) explored "how LGBT-supportive workplace policies shape the experience of lesbian, gay men, and bisexual employees". On the basis of this impressive body of literature, researchers have shown that existing policies do not support employees' psychological improvement in terms of equality between individuals of other genders and LGBTQ+ (Lloren & Parini, 2017; Szlávi, 2022; Thiel et al., 2023). Some scholars, such as Sansone (2019), have characterized these special genders as pink workers without showing how these workers' rights can be protected by law.

Similarly, most of these scholars have failed to present all of these gender needs together in one paper, which was found in the discussion of Bamforth (2016). Unlike other legal scholars, Bamforth (2016) have emphasized LGBT individuals and other genders to describe discrimination scenarios based on different sexual orientations and gender identities in Europe. To present the overall status of different genders, Bamforth (2016) partially portrayed a discrimination scenario involving individuals of different genders in the workplace; nonetheless, in this paper, hind sighted people about the weakness of anti-discrimination legislation has been highlighted.

Consequently, such studies generally raise questions such as how people's attitudes can be shaped through legal initiatives. No mistake, laws have the power to shape societal attitudes (Aksoy et al., 2020). From this point of view, Lloren and Parini (2017) showed that gender-specific supportive policies and laws can help reduce discrimination in the workplace and assist in improving the psychological health of employees. Nonetheless, giving priority to accessing equal job opportunities when individuals are experiencing a nondiscrimination environment toward each gender according to their sexual orientation largely depends on the legal structure, which remains untold in most of the literature.

Furthermore, it is quite common for each gender to have its own need to lead a successful professional life. Some of them can be found to have a common need, such as getting equal opportunity to get a job, and at the same time, some can be found to have a specific need, such as pregnancy leave. Unlike earlier studies (i.e., Alon et al. (2020a), Sunindijo and Kamardeen (2017), Chung and Van der Lippe (2018), and so on), which stress comparing men

and women in terms of gender equality in the labor force, this study figures up all-gender needs based on their sexual orientation associated with the labor force. However, for common needs, as in other studies (i.e., Inoue (2020), Green (2017), Buribayev and Khamzina (2019)), this study also highlights the status of equal opportunity to obtain a job and promotion, receiving vocational training, equal opportunity to be involved in an organization, equal opportunity to be involved in entrepreneurship, equal wages and pensions, and equal treatment of the same environment.

To understand specific gender needs, this study accounts for all kinds of discrimination that occurs based on sexual orientation toward transgender individuals in the workplace, such as harassment, deprivation in decision-making, parental leave, care responsibilities, physical or sexual attacks, psychological pressure to quit a job, and passing homophobic comments (Cannon, 2020; EC, 2022; Goñi-Legaz & Ollo-López, 2017; Hoel et al., 2021; Närvi & Salmi, 2019). Sometimes, an individual can face multiple grounds for discrimination (Aksoy et al., 2024; Banik et al., 2023; Cormack et al., 2018; EC, 2022; Moretti, 2023; Sansone, 2019). For instance, an individual may be discriminated against both as an ethnic minority and sexual minority or from religious and sexual grounds (Banik et al., 2023; Roots, 2022; Sándor, 2016; Sansone, 2019). A sense of helplessness can be a common circumstance in such a scenario that increases mistrust in public institutions and raises the question of justice in society. Therefore, studies such as “understanding the challenge of transgender involvement in the labor force” are important.

In light of these connections, the current study not only fills in the gaps in the research that has already been done, but it also broadens the discussion on the intersectionality of gender, sexual orientation, and legal systems in the labor market. This research sheds light on the fact that transgender people are not only subjected to prejudice on the basis of their gender, but also suffer additional problems that are amplified by factors such as ethnicity, socioeconomic status, and even geographical location. For instance, transgender persons who come from underrepresented ethnic groups or rural origins may be subjected to increased prejudice, which makes it even more challenging for them to have access to equitable job opportunities.

There have been a few studies that have investigated the legal hurdles that transgender persons face in particular nations, such as Hungary and Bangladesh; however, these studies frequently fail to take into consideration the cultural and socio-economic barriers that make these problems much more severe. The purpose of this research is to provide a more thorough knowledge of the job obstacles that transgender persons encounter in a variety of countries by concentrating on both the legal frameworks and the social realities of transgender individuals.

The purpose of this research is to provide not only an academic contribution but also practical policy suggestions for the purpose of creating a labor market that is more inclusive and equal for people of all genders. This will be accomplished by comparing the issues that are faced in Hungary and Bangladesh.

2 Methodology

2.1 Nature of the study

This study delves into the employment experiences of transgender individuals from Hungary and Bangladesh through a qualitative research manner. Interpretivism, the central tenet of this study, holds that humans are best able to understand reality through their own subjective interpretations because reality is constructed by society (Babbie, 2020; Goldkuhl, 2012). Using this philosophical paradigm, the author has been able to investigate the cultural, legal, and personal factors that impact the employment experiences of transgender people in these two distinct places (Goldkuhl, 2012). Moreover, it is especially appropriate for this study since it aims to reveal the complex, distinctive challenges encountered by transgender individuals in employment within their distinctive socio-cultural environments (Babbie, 2020). Interpretivism enables the author to examine how individuals interpret their experiences and deal the labor market, offering a more profound understanding of the intricacies of their participation in the workforce.

Although social phenomena are created by human interaction and influenced by both visible and invisible structures, the author has taken an ontologically critical realist posture, recognizing that these phenomena nonetheless exist independently and have observable effects (Fletcher, 2017). It aspires to comprehend the fundamental processes. In addition, critical realism recognizes that social phenomena are not solely driven by human perceptions and interactions, as interpretivism suggests (Babbie, 2020). Critical realism also acknowledges the existence of underlying structures and mechanisms that play a significant role in shaping these experiences (Babbie, 2020; Fletcher, 2017). Within the scope of this research, critical realism facilitates the acknowledgment that the difficulties encountered by transgender individuals in the workforce are not solely based on personal perspectives but are also influenced by wider structural elements such as legal systems, societal expectations, and economic circumstances in both Hungary and Bangladesh. Thereafter, the research design and analysis have been driven by this approach, which ensures a balance between subjective experiences and the objective structures that influence phenomena.

This study employs a comparative approach to enhance the analysis of transgender employment experiences in Hungary and Bangladesh, in addition to critical realism and interpretivism. The comparative framework enables a more comprehensive examination of the manner in which transgender individuals navigate the labor markets in two distinct socio-cultural and legal contexts. Although Hungary's legal framework purportedly safeguards against discrimination, recent political and legal reforms have fostered an increasingly hostile environment for transgender individuals. In contrast, Bangladesh has made strides in acknowledging transgender individuals; however, it continues to contend with societal stigma and systemic exclusion. The study endeavors to identify both country-specific factors and common challenges that influence the access of transgender individuals to employment opportunities by comparing these two countries. The comparative approach not only emphasizes the subtleties of each country's situation but also provides a more comprehensive understanding of the global fight for workplace equality and transgender rights.

2.2 Integrating Legal and Empirical Methodologies

This study adopts an interdisciplinary socio-legal approach that combines empirical qualitative research with legal-institutional analysis. Rather than employing a traditional doctrinal method, the legal component of this study is embedded within broader social inquiry and policy-oriented analysis. The motivation for this integrative approach stems from the recognition that transgender individuals' access to employment is shaped not only by legal texts or policies but also by how those frameworks are interpreted, applied, and experienced in lived realities.

The legal aspects of this study primarily concern the examination of national and international instruments that explicitly or implicitly shape the labor rights of transgender individuals. These include references to international legal frameworks—such as the International Labor Organization's conventions and recommendations, the Yogyakarta Principles, and CEDAW—as well as the formal recognition of third-gender status in Bangladesh and constitutional protections in Hungary (Straube, 2020; Vida, 2019). These legal references are not studied through doctrinal interpretation, but rather through the lens of how they are perceived and experienced by transgender individuals in their employment journey.

The empirical core of this study is based on in-depth interviews with transgender individuals in Hungary and Bangladesh. These narratives serve as the primary source for understanding how legal instruments are either enabling or failing to ensure inclusion in the labor market. The emphasis is placed on the disjuncture between legal recognition and actual

practice, illustrating how rights may exist in theory but remain unimplemented or misunderstood in the daily lives of the transgender population.

The integration between legal and empirical data occurs through interpretive analysis. Respondents' experiences of exclusion, discrimination, or limited access to formal employment are critically analyzed in relation to the broader legal and institutional landscape of each country. The study thus does not aim to evaluate legal texts in isolation, but instead assesses how effectively these frameworks function in social reality, as perceived by those most affected.

This interdisciplinary orientation also allows for the identification of gaps between policy intention and policy implementation. It provides insight into how national laws and international commitments may be insufficient when not supported by social acceptance, institutional accountability, or political will. By combining personal testimony with legal context, the study offers a grounded, people-centered understanding of the systemic challenges that transgender individuals face in accessing equitable labor opportunities.

2.3 Comparison Grounds

The subsequent table (Table 1) illustrates the numerous levels of comparison that are founded on the grounds of this study. The study contrasts national guidelines with international guidelines and policies that prioritize the rights of non-binary individuals, with a particular emphasis on transgender individuals in Hungary and third gender individuals in Bangladesh, at the broader or macro level. This level of comparison is instrumental in comprehending the extent to which national policies are consistent with or inconsistent with international standards, thereby providing a global perspective on the broader framework of non-binary rights. The research compares national policies and legal systems with the actual national practices at the second level, the micro level, thereby emphasizing the discrepancies between law and its implementation. This comparison is indispensable for comprehending the practical obstacles encountered by transgender individuals, as well as the constraints in legal protections or social provisions that impede their integration into the workforce.

In order to gain a more comprehensive understanding of the labor status of transgender individuals in society, a comparative discussion is conducted at the local or municipal level between the perceptions of non-binary individuals and those of mainstream individuals. This level concentrates on the public perceptions and societal attitudes that affect the opportunities available to transgender individuals in the workplace. This research emphasizes the contribution of social attitudes to the reinforcement or challenge of the obstacles that

transgender individuals encounter when seeking formal employment by contrasting their perceptions by the general public and mainstream populations.

Lastly, the study compares non-binary individuals who are engaged in any occupation with those who are not at the individual or *Nano* level. The objective of this comparison is to offer a more detailed comprehension of the personal obstacles encountered by non-binary individuals in the labor market, by investigating the factors that either facilitate or obstruct their participation in various categories of work. The research endeavors to identify the precise obstacles that impede non-binary individuals from entering or remaining in the workforce by comparing the experiences of employed and unemployed individuals.

Table 1 different level of comparison.

Levels	Opinion	Opinion
<i>International/Macro</i>	International Policy/Guideline	National Guideline
<i>National/Micro</i>	National Policy/legal system	National Practice
<i>Local/Meso</i>	Transgender	Mainstem people
<i>Individual/Nano</i>	Transgender who involved in any occupation	Transgender who are not involved in occupation

(Source: Author Produces, 2023)

The decision to conduct a multilayer comparison in this study was motivated by the intricacy of transgender inclusion in the labor market. The diverse array of factors—legal, societal, cultural, and personal—that affect the capacity of transgender individuals to engage in the workforce cannot be adequately captured by a single level of comparison. This study provides a more comprehensive perspective on the issue by utilizing multiple layers of comparison, which incorporate the societal and personal experiences that influence the employment status of transgender individuals, in addition to the legal and policy frameworks.

A comprehensive analysis of the factors at play, from international and national legal frameworks to individual experiences in the labor market, is facilitated by the macro, micro, meso, and nano levels. This stratified approach is especially crucial for the purpose of identifying voids in policy implementation and comprehending the ways in which transgender individuals navigate their employment challenges at various societal levels. The objective of this study is to contribute to broader discussions on the inclusion of marginalized groups in the labor market and to provide a more nuanced and comprehensive understanding of the barriers to transgender employment in Hungary and Bangladesh through the use of this multilayered comparison.

2.4 Justification of Comparative Case Selection

The selection of Hungary and Bangladesh as comparative cases is deliberate and methodologically grounded in a “most different systems” design introduced by Przeworski & Teune (1970) (as cited in (Pickel, 2007)), a classic comparative approach that seeks to uncover shared phenomena across otherwise dissimilar contexts. Although Hungary and Bangladesh differ significantly in geopolitical alignment, legal traditions, economic status, and development indicators, both countries display systemic exclusion of transgender individuals from formal labor markets, despite engaging with international legal frameworks and demonstrating legal recognition of gender diversity to varying extents.

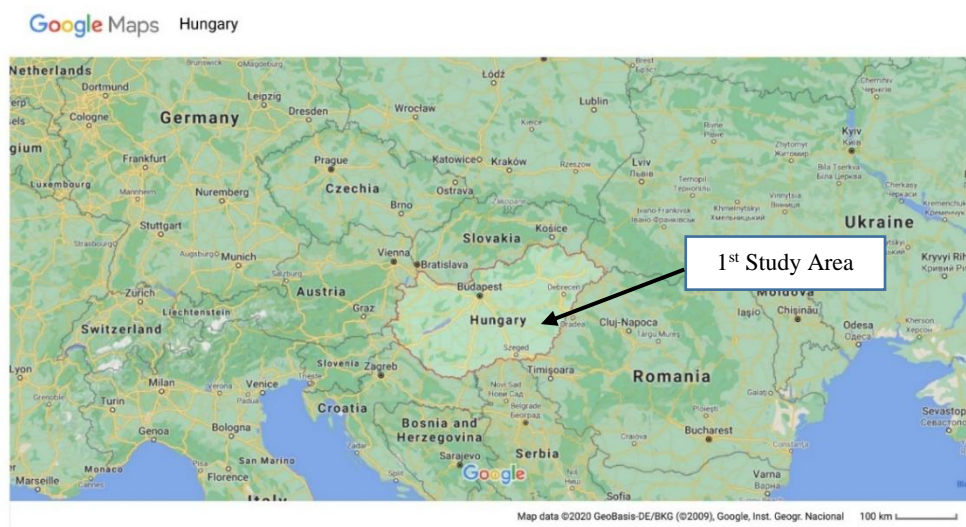
From a conceptual standpoint, Hungary represents a post-socialist EU member state with access to advanced legal mechanisms, including binding anti-discrimination directives, while Bangladesh reflects a postcolonial Global South context, where social recognition has outpaced formal legal protection. This contrast enables the study to explore how transgender labor exclusion transcends legal formality, suggesting that the roots of exclusion lie not only in the presence or absence of law but in how law is experienced, implemented, and mediated by institutions and culture. Furthermore, both countries have taken symbolic steps toward legal recognition of gender diversity: Hungary through past legal gender recognition mechanisms (since reversed) and Bangladesh via third-gender identification. Yet, both have failed to translate recognition into employment protection, making them valuable cases for assessing the disconnect between legal recognition and socio-economic inclusion.

This pairing also contributes to diversifying comparative legal and social research, which often overlooks non-Western jurisdictions or treats the Global South only as a singular category. By juxtaposing two highly distinct countries, the study challenges assumptions that stronger legal systems (e.g., those in the EU) necessarily ensure better outcomes for marginalized groups. It also provides an opportunity to decenter Western-centric legal narratives, showing that exclusion can persist in formally advanced legal settings while informal or hybrid responses may emerge in lower-income contexts. Thereafter, the choice of Hungary and Bangladesh is not accidental, but a strategic effort to interrogate how legal frameworks and labor exclusion intersect across contrasting legal, political, and socio-cultural terrains. This comparative lens deepens the explanatory power of the research and contributes to both socio-legal and gendered labor studies by identifying shared structural barriers within different legal-institutional environments.

2.5 Background of the Study Area

To understand how a developed country meets the challenge of third-gender engagement in the labor force and how a developing country can solve its challenge of third-gender employment, the selection of Hungary as a developed country and Bangladesh as the fastest developing country would be deemed suitable. However, the rationale for selecting these two countries was their homophobic and transphobic public attitude. In mid-December 2020, Hungarian legislators introduced a new law that imposed restrictions on LGBT rights, differing from approaches taken by other European countries.

Nevertheless, despite the existence of a discriminatory homophobic environment, Hungary still secures the involvement of LGBTQ+ people in the labor force through laws. However, due to transphobic public attitudes, the Bangladesh government is failing to involve transgender people in the labor force both institutionally and publicly. Therefore, having similar mainstream people's feelings toward third-gender people's rights has created an ideal space for these two countries to compare. The following discussion provides a general overview of these two study areas.



(Source: Google Maps, 2020)

Figure 1 the map of Hungary.

Hungary is a landlocked country in central Europe bordered by Slovakia and Austria to the north, Ukraine and Romania to the east, Slovenia to the west, and Croatia and Serbia to the south. In addition, several Hungarian or Magyar ethnic groups live in Hungary (Figure 1). The coordinates are 47°00' north and 20°00' east, with 93,030 km² areas. With respect to the 57th largest economic status, the OECD member state Hungary is also characterized by a very high human development index and a skilled labor force with the 13th lowest income inequality in

the world. By 2020, approximately ten million people lived in Hungary, and the nominal per capita income was \$15,372, with a 4.5% GDP growth rate (Eurostat, 2020). In 2016, a report showed that 1.5% of people identified themselves as LGBTQ+ people in Hungary, whereas overall, 6% of people in Europe identified themselves as LGBTQ+ people (Deveaux, 2016).

On the other hand, Bangladesh is a South Asian mostly low-lying riverine densely populated country with a 580 km coastal area. The latitude and longitude of Bangladesh are 23.6850° north and 90.3563° east, respectively. She borders India and Myanmar (Figure 2). Within the 147570 km² land area, she has approximately one hundred and sixty-five million people (Worldometer, 2020), of whom more than half a million people are characterized as transgender (Shovon, 2018). Since the legislation of Bangladesh does not allow the Lesbian, gay, or bisexual community to exist, there was no population record of these individuals. In addition, Bangladesh is the second-largest economic sector in South Asia. With a 6.8% GDP growth rate, her nominal per capita income was \$2,064 by the fiscal year 20/21 and a 4.15% unemployment rate (Plecher, 2020).



(Source: Google Maps, 2020)

Figure 2 the map of Bangladesh.

2.6 Data Collection Instrument

Table 2 describes the research objectives, supporting codes, interview questions, and supporting literature for a study on the employment situation and experiences of transgender people in Hungary and Bangladesh. The table was rigorously designed to link each study objective with particular interview questions and relevant literature, ensuring a thorough approach to data collecting. The study’s first purpose was to better understand transgender people’s job situation. Supporting codes included descriptions of occupations and work satisfaction, as well as job-acquisition processes and discriminatory observations. The

interview questions were aimed to gather thorough replies regarding the participants' job duties, attitudes toward their work, strategies of obtaining employment, and experiences or observations of prejudice. The literature supporting these queries gave a foundational grasp of the matter, citing sources such as Aksoy et al. (2024) and Dutta (2023), who had previously investigated comparable issues.

Objective 2 investigated the impact of national legislative changes on public perceptions of transgender occupational participation. The accompanying codes addressed contemporary issues, personal experiences with discrimination, and the impact of gender/sexual identity on discrimination. Interview questions were designed to go deeper into these topics, asking participants about their experiences with prejudice, the challenges they encounter, and their observations of others. Amanullah et al. (2022) and Collins et al. (2015), among others, provided a theoretical basis for our findings in the literature that was cited.

Objective 3 investigated the impact of legal actions on transgender work status in Hungary and Bangladesh. This goal was supported by codes relating to anti-discrimination measures, rights awareness, and legal protections. Interview questions focused on the efforts participants had taken to combat discrimination, their understanding of legal rights and protections, and their awareness of international organizations such as the ILO. Publications such as Price et al. (2024) and Walters et al. (2017) and so on, which comprise the supporting literature, offered valuable information regarding the legal frameworks and protections that transgender individuals can access. This systematic method meant that the data collection instrument was reliable and comprehensive, allowing for a more nuanced knowledge of the research themes.

Table 2 research objectives, supporting codes, corresponding interview questions, and supporting literature.

Research objective supporting codes	Interview questions	Supporting literature
<i>Objective 1: To understand the employment status of transgender people in Hungary and Bangladesh.</i>		
Descriptive Information	1.7 Occupation 1.8 Occupational position:	(Aksoy et al., 2024; Al-Mamun et al., 2022;
Introduction to Job	2.Please tell us something about your job.	Barát, 2022; Dutta, 2023; Gomes de Jesus et al., 2020; D. B. Hill & B. L. B. Willoughby, 2005;
Job Satisfaction	3.How do you feel in this working position? Do you like to work what you are doing now? Please explain.	McFadden, 2020;
Job Acquisition	4.How were you able to secure/get this job? Please explain.	Mount 2020; Primecz & Pelyhe, 2023; Reiman et

Observations of Discrimination	8.What are the common types of discrimination you have seen experienced by other transgender individuals?	al., 2023; Sifat & Shafi, 2021; Yasmeen et al., 2024)
<i>Objective 2: To explore the influence of different national legislative movements on mainstream people's perceptions of transgender people's mainstream occupational involvement.</i>		
Current Challenges	6. What kind of challenges are you facing now or after getting this job? Please explain.	
Personal Experience of Discrimination	7. What are the common types of discrimination you have experienced?	
Observations of Discrimination	8.What are the common types of discrimination you have seen experienced by other transgender individuals?	(Aksoy et al., 2024; Al-Mamun et al., 2022; Amanullah et al., 2022; Aziz & Azhar, 2019; Barát, 2022; Collins et al., 2015; Dicklitch-Nelson & Rahman, 2022; Dutta, 2023; Koch et al., 2020; McFadden, 2020; Mount 2020)
Impact of Gender/Sexual Identity on Discrimination	9. Do you think because of your gender/sexual identity you are facing discrimination in your personal and professional life? Please explain.	
Witnessing Discrimination	14. Have you witnessed others being discriminated against?	
Equality in Access	16. Do you think you are getting similar access to other binary people in your employment? If yes, then how? If no, then why? Please explain.	
<i>Objective 3 To explore the consequences of different international and national legal initiatives on transgender labor status between Hungary and Bangladesh.</i>		
Actions Against Discrimination	10.Did you take any steps against this discrimination? How? Was it legal or social? Please explain.	
Awareness of Rights	11. As a citizen of your nation, do you know what kind of rights you have? If yes, how do you know that? Please explain.	
Legal Protections	12. Can you please tell me what kind of laws [local, national, international] are there to protect your rights [labor and civil rights]? Do you know if there are any laws and policies to protect your labor rights and civil rights? Please explain.	(Al-Mamun et al., 2022; Aziz & Azhar, 2019; Fedorchenko, 2024; Mount 2020; Price et al., 2024; Primecz & Pelyhe, 2023; Roots, 2022; Sifat & Shafi, 2021; Ünsal et al., 2024; Walters et al., 2017; Wilson, 2020; Yasmeen et al., 2024)
Legal Aids	13. Do you know what kind of possible legal aids for harassment or discrimination are available in your country?	
Knowledge of International Organizations	15. Do you know about ILO? What do they do? What kind of steps have they taken for you to secure your employment? Please explain.	
Closing Thoughts	17.Tell me something more about it.	
Observatory note	Researchers own observatory report	

(Source: Author produces, 2022-2023)

The systematic data collection allowed for the development of rich and detailed insights into the experiences of transgender individuals as a result of the structured approach of coupling each research objective with specific interview questions and supporting literature. The research methodology underscored the significance of a comprehensive and focused approach, with each interview question meticulously crafted to elicit information that could be utilized to investigate the more general themes of discrimination, legal protections, and the

influence of societal attitudes. The study was able to capture the subjective experiences of transgender individuals and the objective structural factors that influence their employment outcomes by combining qualitative interviews with a rigorous literature review.

What is the rationale behind this novel methodology? The complex nature of transgender issues in the labor market is the reason for the decision to employ this particular data collection instrument. The challenges that transgender individuals encounter are numerous and cannot be comprehended through a single perspective. This study guarantees that all pertinent factors—social, legal, and personal—are comprehensively examined by associating each research objective with specific interview questions and supporting literature (Sony, 2025). The instrument was developed to motivate participants to contemplate their experiences and submit comprehensive, detailed responses that would be indispensable for comprehending the intricacies of transgender employment issues in Bangladesh and Hungary. Additionally, the interview process was guided by the integration of existing research in the form of supporting literature, which ensured that the data obtained was both pertinent and grounded in the existing body of knowledge.

The multilayered approach in the design of the interview questions also allowed for a deeper exploration of the intersections between legal protections, social perceptions, and personal experiences. The questions were constructed not only to capture the objective realities of transgender individuals' employment but also to explore the subjective aspects, such as their feelings of job satisfaction, experiences of discrimination, and the psychological impact of workplace prejudice. By addressing both macro (legal and policy) and micro (personal and social) levels of transgender employment experiences, the study ensured that it would capture the full complexity of the challenges faced by transgender individuals in different sociocultural contexts.

2.7 Unit of Analysis

In general, this study concentrated on transgender individuals who are nationals of Hungary or Bangladesh, have lived in their respective countries since infancy, and are over the age of 18. These individuals are born with two sex elements. The inclusion of these criteria guarantees that the participants develop a comprehensive comprehension of the socio-legal, cultural, and economic contexts of their respective countries at a young age. This comprehension is essential for the production of pertinent and insightful data regarding their professional experiences, as these individuals have been influenced by the economic conditions, legal frameworks, and societal norms of their respective countries. The study's objective is to provide a

comprehensive and accurate view of the obstacles that transgender individuals encounter in these specific labor markets by concentrating on adults who are legally recognized as capable of working and have had sufficient exposure to the workforce.

Ensuring that the study concentrates on individuals who are lawfully eligible to work and have encountered the professional and social obstacles of maturity, the decision to include only those over the age of 18 was made. These individuals are more likely to have encountered a variety of real-world barriers, including workplace discrimination, societal stigma, and legal limitations, which renders their experiences highly germane to the study's objectives. Furthermore, the study guarantees that the data collected accurately reflects the nuanced and intricate nature of transgender employment challenges in Hungary and Bangladesh by concentrating on a sample of transgender individuals with substantial personal and professional experience.

According to the criteria offered by the American Psychological Association (APA), the research particularly included those who self-identified as transgender or as a third-gender in the case of Bangladesh. This was done in accordance with the definition. Individuals who have a gender identification that is different from the sex that was assigned to them at birth, either psychologically, physically, or both, are included in this description. The inclusion of persons who identify as *Hijra*, which is a legally recognized third gender, greatly enhances the research in the instance of Bangladesh. This is because it captures the one-of-a-kind experiences of this group, which has historically inhabited a different socio-cultural space. The study is able to successfully incorporate a wide range of transgender experiences because it makes use of this all-encompassing criterion. This includes individuals who have transitioned physically or socially, as well as those who may identify as gender non-conforming but have not undergone any kind of medical or social transition.

A more sophisticated knowledge of the many challenges that transgender persons confront in the job market may be obtained by the inclusion of a wide variety of transgender identities and experiences in the research study. Not only does this encompass the difficulties associated with discrimination in the workplace, but it also encompasses other concerns, such as the availability of medical treatment, legal recognition, social acceptability, and the capacity to fully engage in societal activities. The research can provide insights that are not only useful for policymakers but also for organizations that are working to improve workplace diversity and inclusion for transgender populations. This is because the study focuses on transgender individuals who are fully integrated into the social, legal, and cultural fabric of Hungary and Bangladesh.

Furthermore, the study assures that it captures the long-term influence of cultural views and legal systems on the personal and professional development of transgender persons for the reason that it focuses on individuals who have resided in these nations since infancy. This approach acknowledges that the experiences of transgender people are formed throughout the course of their whole lives by having contacts with their families, peers, and institutions. Furthermore, it acknowledges that these early experiences have a significant impact on the interactions that transgender people have later on in their careers. The study contributes to a deeper understanding of the socio-cultural and legal dynamics that inform transgender people's workforce participation. It also highlights the ways in which their gender identity influences not only their professional lives but also their social and psychological well-being. This is accomplished by taking into consideration the entire life course.

2.8 Sampling Procedure and Sampling Techniques

2.8.1 *The sample technique*

The method of sampling that was utilized in this research endeavor was meticulously designed to guarantee the incorporation of a diverse variety of experiences from transgender people residing in both Hungary and Bangladesh simultaneously. Because of the delicate nature of the subject matter, which encompasses very personal experiences of prejudice and marginalization, it was absolutely necessary to employ a strategy that would both guarantee inclusion and portray the variety of experiences that transgender individuals have had. The researcher used a combination of purposive and snowball sampling procedures, which were aimed to generate a complete and diversified sample, in order to overcome the obstacles that were experienced in both nations and to guarantee that a broad spectrum of opinions was covered.

The first method that was used to strategically select participants who met specific criteria was called purposeful sampling. These criteria included being a transgender individual who was over the age of 18, having lived in Hungary or Bangladesh since childhood, and having first-hand experience with employment or issues related to work. A targeted inclusion of individuals who had a profound awareness of the socio-cultural, economic, and legal situations of their respective nations was made possible by the utilization of this strategy. The use of purposive sampling guaranteed that the research was founded on experiences that were not only pertinent but also enlightening. This was accomplished by concentrating on individuals who were able to provide insightful viewpoints.

At the same time, snowball sampling was utilized in order to further extend the pool of attendees. As a result of the stigma and marginalization that transgender people frequently

experience, this method was especially significant in terms of reaching out to members of the transgender community who might not be easily identifiable through more traditional ways. By utilizing initial contacts to introduce additional participants, snowball sampling allowed the researcher to engage with individuals who were either difficult to approach or hidden from view. This strategy not only increased the size of the sample, but it also made it possible to include individuals who may not have been included in the study otherwise. These individuals include transgender persons who live in rural regions, people from lower socioeconomic backgrounds, and members of the transgender community who are less exposed to the public eye.

The researcher was able to collect a wide variety of transgender experiences by utilizing a combination of purposive and snowball sampling. This allowed the researcher to ensure that the sample mirrored a variety of social and economic situations, such as varying degrees of legal recognition, employment success, and societal acceptability. Using this selection technique, we were able to strike a compromise between choosing individuals who were capable of providing in-depth information on the study objectives and allowing for the organic extension of the sample to include various viewpoints who may have been neglected in earlier studies. By doing so, the research was able to collect a wealth of diverse data that may offer a full understanding of the issues that transgender persons encounter in Hungary and Bangladesh. This study shed light on both the similarities and differences that exist within these two environments.

2.8.2 *Initial outreach and recruitment strategy*

In the first step of the process, the author made contact with two Hungarian groups, Hatter Society and Amnesty International, along with the assistance of a research supervisor who is informed about LGBTQ+ problems. Due to the fact that these organizations introduced this study to potential interviewees and allowed the author to utilize their social media channels, particularly Facebook groups, to spread the news about the study, the author was able to interact with participants. However, the author was able to establish links in Bangladesh with social welfare organizations that provide help to transgender individuals and *Hijra* persons. Additional personal connections within these networks in both countries were utilized by the author in order to locate potential volunteers.

When taking into consideration the transphobic movements that took place in Bangladesh during the month of December 2024 and the transphobic law that was just recently passed in Hungary, it was of the highest significance to ensure the safety and comfort of the

participants. Because of this, the process of hiring needed to be approached in a manner that was both subtle and flexible. Purposive sampling was utilized by the author in order to choose participants who met particular criteria that were related to the objectives of the study. These criteria included being transgender persons who were actively involved in the workforce.

In order to accomplish this goal, it was necessary to gather a wide range of experiences from a variety of different career fields. In addition to that, the author conducted snowball sampling, which entailed asking participants to offer referrals of other transgender persons who would be interested in participating in the study. A large amount of usefulness was proved by this strategy in circumstances when it was difficult to locate cooperative participants due to safety concerns and a reluctance to publicly address sensitive subjects.

2.8.3 *Data collection timeline, and sampling processes*

By utilizing a variety of approaches to recruit participants in both Hungary and Bangladesh, the author made an effort to include a degree of unpredictability into the study despite the constraints that were placed upon it. In Hungary, participants were chosen based on their reactions to posts made on social media platforms, and further suggestions were offered by groups like as Amnesty International and the Hatter Society. It was possible to discover individuals who felt comfortable sharing their stories with the assistance of these groups, who are well-known for their activism on LGBTQ+ rights. Through the use of this methodology, the research endeavor made certain that the sample comprised persons who were not just actively involved in the advocacy community but also those who might not have had any past experience with groups of this kind but were eager to take part in the study(see Table 3 demographic information of the respondents.). The fact that social media recruiting was open-ended made it possible to acquire participants from a more natural and possibly varied pool of individuals.

Personal networks and social welfare organizations were the primary targets of the recruiting process in Bangladesh, with the goal of reaching transgender persons. This strategy was especially pertinent in an environment where direct interaction with marginalized groups might be more difficult owing to the stigmas that are associated with society and the limits that are present in the legal system. In order to give participants with a secure environment in which they might feel comfortable coming out, social welfare groups that serve the *Hijra* community and personal networks within the transgender community were utilized. By taking this approach, it was possible to ensure that recruiting procedures were attentive to the socio-

political dynamics in Bangladesh, while also allowing for a more comprehensive representation of transgender persons, including those from less visible parts of the population.

The author made a concerted effort to recruit participants from a wide range of occupational sectors in order to guarantee that a comprehensive grasp of the difficulties encountered by transgender persons in the workforce was achieved. These individuals were employed in a variety of job situations, including both organized and unstructured settings. The purpose of the study was to provide a diverse depiction of the employment experiences of transgender individuals across a variety of socio-economic contexts. This was accomplished by including participants from a variety of industries, ranging from formal sectors, such as government offices or healthcare, to informal sectors, such as street vending or domestic work. This diversity in the types of jobs also helped to a greater understanding of how structural inequalities in the labor market affect transgender persons differently depending on the industry in which they are employed. This insight was made possible by the abundance of employment opportunities.

The technique of collecting data was designed to ensure the participants' comfort and safety throughout the entire procedure. When conducting in-depth, one-on-one interviews in Bangladesh, the author relied on Bengali as the primary language. This was done to ensure that the language of communication was easily accessible and comfortable for all of the participants. In order to maintain anonymity and provide a secure environment in which the participants could freely discuss sensitive themes including prejudice, legal hurdles, and personal experiences within the workforce, interviews were carried out in private settings. Following the completion of the interviews, the transcripts were transcribed into English for the purpose of additional study. This technique not only guaranteed that the replies were clear, but it also preserved the integrity of the comments by enabling an exact translation of complex language and personal tales.

The interviews that were performed in Hungary were conducted in person around sixty percent of the time. Nevertheless, in light of the challenges and risks that are connected with direct contact, particularly in light of the recent political upheavals and public attitudes against transgender persons in Hungary, the remaining interviews were carried out either online or through the use of Google Forms by the researchers. In order to give the participants' safety the highest priority and to respect their wishes regarding anonymity and privacy, this technique was deliberately selected. Face-to-face meetings, which might have caused significant safety issues for participants, were replaced with online interviews, which enabled flexibility and helped lessen the dangers those interactions posed.

Since English was the more frequent language for communication in Hungary, the bulk of the interviews were carried out in English. A volunteer aided with the translation of the replies into English for those participants who chose Hungarian. This was done to ensure that the contents were effectively expressed even though significant subtleties were ignored. Given the sensitive nature of the information included in the interview, this was of utmost importance, as it was required to ensure that the data acquired was translated accurately to retain its dependability.

The period of time during which data was collected took place from September 2023 to May 2024, which corresponds to two academic semesters. In spite of the sociopolitical problems that were encountered in both Hungary and Bangladesh, the researcher was able to carry out a data gathering procedure that was both comprehensive and carried out in an ethical manner because to the prolonged timetable. In Bangladesh, the collection of data took place between the months of September 2023 and January 2024, whilst in Hungary, it took place after February 2024 and continued until May 2024.

Because of the extended timeline of the study, there was sufficient time to reach out to a diverse group of participants, provide opportunities for them to participate in interviews, and make allowances for any delays that may have occurred due to logistical or ethical considerations. This was especially important when it came to navigating the challenges of conducting research within environments that were restrictive. This cautious and meticulous approach made it possible to collect a wealth of detailed information that contributed to a thorough knowledge of the experiences that transgender people have had in the job market in both nations.

2.8.4 *Reliability and Validity*

During the course of the research project, the author carried out a number of essential processes in order to guarantee the dependability and validity of the data that was gathered. The research project used a number of measures to ensure that the findings were trustworthy and reliable. This was done because the researchers were aware of how important it is to maintain high standards of data quality while doing qualitative research. The author took preventative efforts to guarantee that the study procedure followed to best standards in ethical and methodological rigor. This was done despite the fact that the Géza Marton Doctoral School of Legal Studies does not have an ethics committee that is explicitly committed to authorizing data collecting tools.

To begin, the author made sure to get clarification from the supervisor of the study regarding the interview rules. The supervisory supervision that was provided was absolutely important in order to guarantee that the interview process adhered to the required academic standards and was in accordance with the goals of the study. A preliminary level of validation was provided by the approval of the supervisor, which ensured that the technique utilized in the study was reliable.

Additionally, the author distributed the interview schedule to a number of academics who were experts in qualitative data collecting. This was done in addition to receiving clearance from the supervisor as well. The comments that these academics offered on the clarity, structure, and appropriateness of the questions was quite helpful. They have substantial expertise in doing research that is comparable to the one being discussed here. Through the use of this peer review procedure, face validation was made possible, which ensured that the interview questions were understandable, objective, and capable of eliciting replies that were both complete and pertinent. On the basis of this input, the questions were modified in order to eliminate any ambiguities and to make certain that they were able to capture the intricacies of the experiences that the participants had.

Furthermore, the research endeavored to ensure that the procedures used to gather data were consistent, which is an essential component in preserving the credibility of the findings. This uniformity was accomplished by standardizing the interview procedure to the greatest extent that was feasible. Interviews were carried out in the languages that were most chosen by the participants, which were Hungarian for those who were located in Hungary and Bengali for those who were located in Bangladesh. This was done to ensure that language barriers did not hamper the accuracy of the replies. In situations where the participants in the study did not have a strong command of the major languages used in the research, expert translators were utilized to guarantee that the interview questions and replies were conveyed in a correct manner. For the purpose of preserving the authenticity of the data and ensuring that the viewpoints of the participants were accurately reflected, this procedure was absolutely necessary.

In order to significantly improve the validity of the study, the researchers utilized methodological triangulation, which involved the utilization of a variety of data sources and approaches. By analyzing and cross-referencing data from a variety of sources, including interviews, literature, and secondary sources, this technique made it possible to get a more comprehensive knowledge of the challenges that were at hand. Therefore, the general validity of the research was improved as a result of the triangulation of these data, which allowed the study to validate the findings and lower the likelihood of any bias or mistake occurring.

Throughout the whole process of data collecting, the researcher also kept a reflective notebook in which they documented their personal biases, ideas, and any difficulties that arose during the interviews themselves. The author was able to critically assess how their personal viewpoints may impact the data collecting and analysis with the assistance of this journal, which served as a tool toward greater transparency in the study process.

The comprehensive documenting of the data collecting procedure, which included precise records of each interview as well as the actions taken to maintain participant anonymity and informed consent, was the last factor that contributed to the dependability of the findings. Through this transparency, the study could be replicated in the future or comparable research might be conducted in different settings, which ultimately led to an increase in the dependability of the study's procedures and conclusions. By adhering to these stringent processes, the author ensured that the study conformed to high levels of reliability and validity. As a result, the author was able to provide insights that are trustworthy and reliable regarding the experiences of transgender persons in the labor markets of Hungary and Bangladesh.

2.8.5 *Ethical Considerations*

All personal data collected in the course of this study were handled in accordance with the ethical standards outlined by my institution and in compliance with the European Union's General Data Protection Regulation (GDPR), particularly in relation to the processing of sensitive personal data under Article 9. Through all phases of the research process, the author made certain that the research was carried out with the utmost level of integrity and respect for the rights of the participants. This was accomplished by adhering to the ethical criteria that were set by the doctorate council of the University of Debrecen. In light of the sensitive and personal nature of the research, which focuses on the experiences of transgender persons, particularly with regard to discrimination and marginalization in the workplace, each and every stage of the study was conducted with a particular emphasis on preserving ethical standards.

The participants were assured of their total anonymity and secrecy under all circumstances. All of the participants were given pseudonyms, and any identifying information that was included in the data was erased. This allowed for the successful completion of the investigation. Additionally, the researcher employed safe data storage techniques, making certain that all interview recordings, transcripts, and other materials pertaining to the study were saved in encrypted files and that only the researcher had access to its contents. That the participants felt secure and comfortable sharing their experiences, knowing that their names

and personal information would be safeguarded, was a very important aspect of this strategy, which was particularly significant.

In accordance with the ethical norms specified for research involving humans, informed permission was acquired from each and every participant. Participants were given information that was both explicit and written describing the goal of the study, the fact that their participation was voluntary, and their opportunity to withdraw from the study at any time without incurring any adverse repercussions. In addition, they were told about the ways in which their data would be used, including the methods by which it would be anonymized and kept, as well as the safeguards that would be put in place to protect their privacy. Participants were able to make an educated decision to engage in the study, fully aware of their rights and the ramifications of their participation in the study, because to the transparency that was available to them.

In light of the fact that the author was aware of the intricacies of the socio-political contexts in both Hungary and Bangladesh, he took extra precautions in order to develop a sample strategy and a collection of data gathering procedures that were capable of navigating the complicated cultural and legal situations of each nation. In Hungary, where the legal and political climate has become increasingly hostile toward transgender rights, the researcher made sure that the methods of recruitment and data collection were sensitive to the risks that participants might face, particularly those who were conscious of the fact that they were not comfortable discussing their experiences in public.

Similar to the situation in Bangladesh, where transgender people, particularly those from the *Hijra* group, are subjected to considerable societal stigma and legal discrimination, the researcher took further precautions to ensure that the participants felt secure and comfortable throughout the interview process. The use of purposive and snowball sampling, in addition to a combination of online, in-person, and written data collection methods, assisted in reaching participants from a wide range of societal sectors. This ensured that the study provided a comprehensive and varied picture of the challenges that transgender individuals face when they are employed.

The decision to conduct interviews online in particular was a deliberate one that was made with the intention of protecting the identities of the participants and providing an additional degree of anonymity. This was especially important in Hungary, where the stigma that is associated with transgender persons is still prevalent in society. Through the use of this strategy, participants were able to take part in the research without the possibility of being recognized or being subjected to prejudice in person. The interviews that were carried out in

Bangladesh were carried out in private settings. This was done to ensure that the participants were in a safe and comfortable atmosphere, away from any external pressures or feelings of judgment. In addition, the utilization of translators, where it was deemed essential, guaranteed that the communication process was not impeded by language hurdles, while simultaneously protecting the authenticity and correctness of the replies.

Through the utilization of these ethical guidelines, the researcher was able to ensure that the study conformed to the highest possible standards of respect and care for the individuals who participated in the research. As a consequence of adopting these safeguards, the findings of the study are not only reliable but also robust. This is because they represent the experiences of transgender people in Hungary and Bangladesh in a manner that places a priority on their dignity, rights, and safety. In order to ensure that the data obtained can be regarded as a legitimate depiction of the lived experiences of transgender persons navigating the labor markets in these two nations, the researcher took a rigorous approach to ethical issues, which contributed to the dependability of the experiment.

2.9 Data Collection, Analysis, and Interpretation

A comprehensive method was applied in this investigation for the purpose of data collection, analysis, and interpretation. This method included the utilization of both secondary and empirical data sources. The literature study was meticulously created by making use of secondary material that was acquired from a broad variety of reliable sources. These sources included articles from scholarly journals, books, and chapters from books, which allowed for the establishment of a large foundation of previously acquired information.

Additionally, in order to enhance the basis for the policy review section, the research used a combination of directives from the European Union, rules from the ILO, and a variety of other international and state laws. The combination of these sources provided a comprehensive and in-depth analysis of the regulatory and policy environment that is relevant to the topic that was being investigated in this study. In addition, both scholarly writings and publications from recognized organizations such as the Fundamental Rights Agency (FRA) and Hatter Society were utilized in order to evaluate and contrast the various conditions that were being researched. The evaluation was able to be enhanced as a result of this since it provided a more comprehensive backdrop and increased the level of depth of the investigation.

The collection of empirical data, which consisted of conducting 46 in-depth interviews, was the primary method of data collection for the exploration. Twenty-three interviews were carried out in each of the two countries, Hungary and Bangladesh, where the distribution of

these interviews was evenly dispersed. For the purpose of maintaining stability and ensuring that the comparative research was conducted in an honest manner, the equal representation was absolutely necessary. The process of data collection was carried out until the data saturation point was achieved, which indicates that the interviews resulted in the absence of any new information or topics.

In spite of the fact that more data was collected from interviews that were conducted beyond the initial 46, it was not included in the final analysis since saturation had already been reached. For the sake of ensuring accuracy and cultural sensitivity, the author conducted interviews in Bengali, which is the native language of Bangladesh. These interviews were then translated into English. In Hungary, interviews were conducted in both English and Hungarian. After the interviews were completed, the transcripts of the Hungarian interviews were translated into English. These translations were examined by two Hungarian volunteers who were native speakers. They certified that the translations properly depicted the original text. This was done in order to assure that the translations were accurate.

Methods that were performed manually alongside with the NVivo 14 program were utilized in order to carry out the data analysis. The individual who was in charge of the research project was the one who paid for the subscription to NVivo 14, which is a software program that provides a full package for qualitative data analysis and places a focus on the relevance of accurate and rigorous analysis. The application of pre-determined codes to the interview transcripts was the first step in the process of data analysis. The use of these codes served as a foundation for categorizing the data in a logical fashion, providing an organized framework. When conducting the analysis of the qualitative data, the researcher made use of a framework matrix and a text search query implemented in NVivo 14. In the subsequent step, manual editing was carried out in order to eliminate redundant information and improve clarity. The data was analyzed in a manner that was both extensive and complicated because to the usage of both software-assisted and manual data collection methods.

In order to facilitate the investigation of correlations and network analysis, NVivo 14 was of utmost importance in the process of translating qualitative data into quantitative information. The ability to recognize patterns and correlations within the data, which would not have been obvious through human study alone, was vital for the purpose of finding these patterns and connections. The researcher was able to get more depth insights into the data by exploiting the extra functions of NVivo 14, which therefore enabled a more thorough interpretation of the results that were reached by the study. Due to the fact that the program

was able to successfully manage huge volumes of qualitative data, the analysis was assured to be exhaustive and methodologically rigorous.

Microsoft Word was used to construct and develop the complete document, which includes the formatting as well as the organization of the material. The processes of arranging and formatting the findings of the research were simplified by this program, which ensured that the communication would be logical and professional. For the purpose of managing references, providing assistance in the preparation of a reference list, and providing precise in-text citations in line with the structure of the APA 7th edition, the Endnote program was utilized throughout the process. The scholarly credibility of the investigation was brought to light by the meticulous attention paid to references.

Throughout the course of the study process, the researcher maintained consistent communication with the supervisor by means of prearranged meetings and updates. This ensured that the supervision and the researcher were in sync with one another. By carefully analyzing the transcripts, coding schemes, and analysis outputs, the supervisor ensured that the data and research were accurate, that there was no redundancy, and that the methodology was solid. In spite of this, the supervisor did not make any contributions to any part of the research, which enabled the researcher to produce work that was both creative and autonomous.

In addition, although the author did not use any artificial intelligence tools to write any text, Quillbot was applied in order to organize and improve the language of the manuscript. A careful analysis and correction of each text was performed by the researcher in order to ensure that it was clear and accurate. The sole purpose of Quillbot's employment was to serve as an editor; he was not involved in the writing process. This was done in order to enhance the document's readability and consistent structure. It is guaranteed that the results and conclusions of the study are robust, trustworthy, and firmly built on a good methodological foundation because of the meticulous and comprehensive methodology that was utilized in the process of gathering, evaluating, and interpreting the data. Both the use of modern digital tools and the careful application of manual approaches serve to highlight the all-encompassing and varied nature of the research process.

An additional method that was utilized to improve the process of data analysis was a cross-comparison strategy. This method involved carefully comparing the themes that were discovered in the interviews between Hungary and Bangladesh. The discovery of both similarities and contrasts in the lives of transgender people in these two separate sociopolitical situations was made possible as a result of this identification. Through the utilization of a comparative study, the researcher was able to shed light on the ways in which national

legislation, cultural norms, and social views influenced the experiences of transgender persons in the job market in both nations. This comparison helped to create a better understanding of the specific challenges that transgender persons confront in a variety of legislative and cultural contexts, as well as the larger implications for transgender rights and labor inclusion policies on a worldwide scale.

The research included member checking, in which a subset of the participants were requested to verify the correctness and interpretation of their interview replies. This was done in order to guarantee the reliability and openness of the findings. For the purpose of confirming the researcher's interpretations and ensuring that the viewpoints of the participants were adequately conveyed, this approach was absolutely necessary. In addition, the researcher kept a reflective notebook throughout the phases of data collection and analysis, in which they documented their own opinions, potential biases, and difficulties that they experienced. The researcher was able to critically evaluate their own effect on the research process through the use of this journal, which resulted in an increase in the validity of the study by ensuring that the analysis was as objective as possible.

A narrative analysis technique was utilized in order to synthesis the data of this study. This approach enabled the construction of detailed and context-rich descriptions of the experiences of transgender persons. The researcher was able to extract important themes and tales from the data by using the narrative technique, which provided a more in-depth understanding of the experiences that transgender workers in Hungary and Bangladesh actually go through in their daily lives. Not only did this technique of storytelling make it easier to arrive at a comprehensive interpretation of the facts, but it also offered a means of establishing a connection between individual experiences and wider socio-legal and cultural concerns. In order to create a comprehensive and multifaceted portrayal of the challenges and opportunities that transgender people face in the workforce, the researcher was able to analyze the data through this qualitative lens. As a result, the researcher was able to contribute valuable knowledge to the larger field of gender studies and employment research.

2.10 Characteristics of the respondents

2.10.1 *Case similarity index*

Figure 3 exhibits 46 examples, 23 of which come from Bangladesh and 23 of which come from Hungary. These cases are displayed in the dendrogram that illustrates a network analysis based on whether or not two words are related. This study demonstrated how transgender people in

both countries have been comparable in terms of their grasp of national legislative concerns and their ability to convey such concerns with their voices.

By analyzing the text responses from each case and categorizing them according to the lexical content of the responses, a clustering technique was utilized as a component of the strategy to categorize cases. Through the use of this method, the similarities and contrasts that exist between the narratives of the respondents regarding their experiences with the legislative system and their understanding of legal protections have been brought to light in a competent manner. Examples that have a greater degree of word similarity are clustered closer together in hierarchical clustering, which results in the formation of a tree-like structure that represents a higher degree of awareness and experience similarity.

The findings suggest that Hungarian instances are frequently grouped together, which suggests that there is a more uniform level of comprehension and expression of their concerns over national legislation across the country. For example, Hungarian Cases 2, 3, and 16 are closely connected to one another, which demonstrates that they have a common understanding of the legal rights they are entitled to and the challenges they face. The presence of this cluster suggests that respondents from Hungary may have a more well-organized knowledge of legal rights. This might be the consequence of improved access to information or increased levels of national involvement.

On the other hand, the samples from Bangladesh had a larger degree of distributed clumping, which indicates a broader range of knowledge and comprehension with the national legal system. There were significant discrepancies between Bangladesh Case 1 and Case 4, as well as several other cases from Bangladesh, which revealed that distinct understandings and interactions with legal safeguards were involved. The dispersion of this information is a consequence of the fragmented and sometimes rudimentary awareness of legal rights that transgender individuals in Bangladesh have.

Items clustered by word similarity

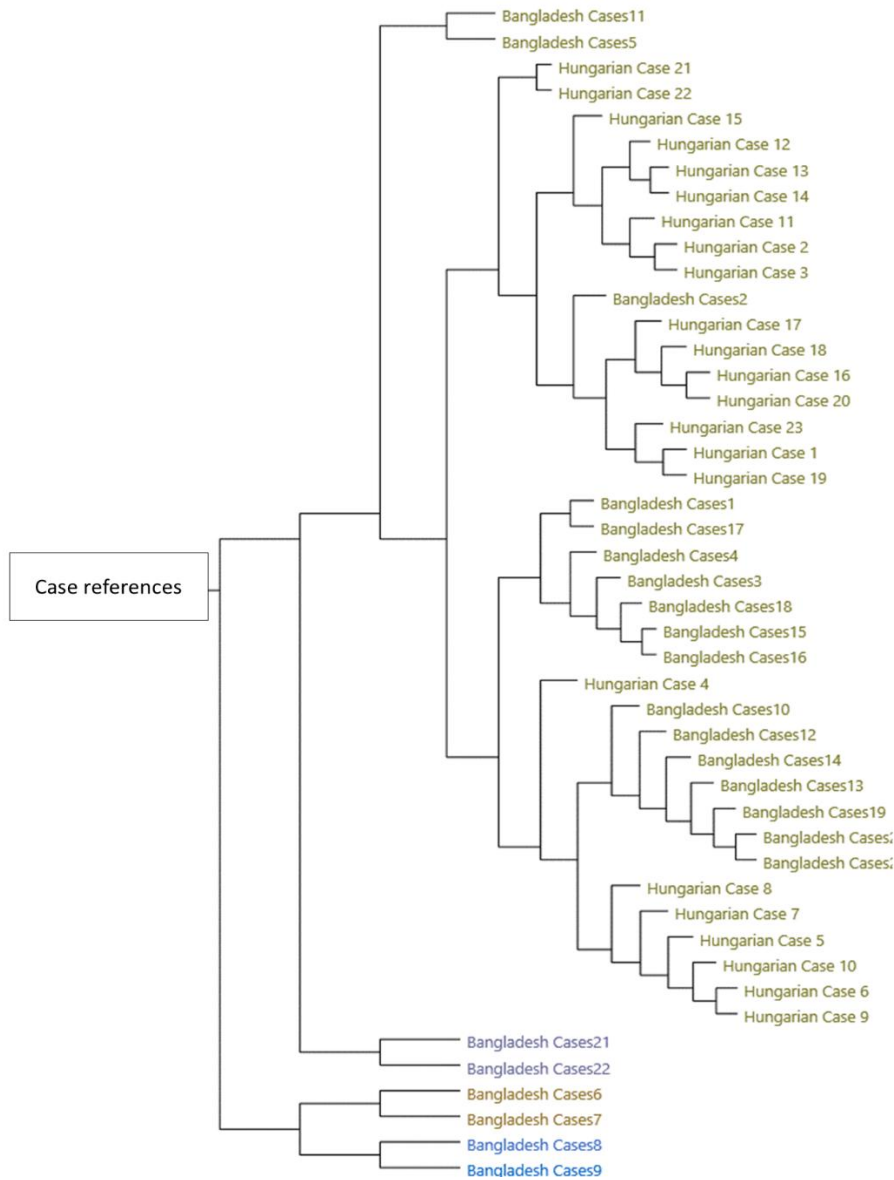


Figure 3 Case similarity index by word similarity.

Howsoever, although having distinct national settings, the mixed clusters—which include instances from Hungary and Bangladesh together—highlight areas of resemblance. For instance, the clustering of Bangladesh Case 11 and Hungarian Case 21 suggests that, despite their disparate locations and legal systems, they have comparable experiences or awareness levels. This kind of analysis, which employs hierarchical clustering based on word similarity, has significantly contributed to the improvement of the comparative legal knowledge of transgender individuals in Hungary and Bangladesh. The domains in which knowledge is consistent across the board and in which noticeable shortages exist have been defined as a result

Bangladeshis identify as third gender, 21.74% as transgender, 17.39% as transgender men, 8.70% as *Hijra*, and 13.04% as transgender women (Table 3). In comparison, the majority of respondents in Hungary identify as transgender men (30.43%) and transgender women (47.83%), with no representation of third gender or transgender women. This suggests that gender identities are more widely accepted in Bangladesh than they are in Hungary, where transgender and transgender male categories are the main focus.

Likewise, religious affiliation highlights significant differences. In Bangladesh, a significant majority of respondents (73.91%) identify as Muslims, indicating the predominant religious affiliation in the nation. A minority of respondents either choose not to divulge their religion (8.70%) or identify with alternative views, with 14.04% opting not to reveal their religious affiliation entirely. Significantly, quite a small fraction of respondents (4.35%) lack any religious conviction, underscoring the profoundly religious character of the populace in Bangladesh. The patterns of religious identification are intricately linked to cultural norms and values, with Islam significantly influencing society expectations, especially regarding gender roles and the treatment of transgender persons. In Bangladesh, the religious identification of transgender respondents may affect their experiences, as society perceptions of transgender individuals are frequently shaped by religious and cultural contexts. This may exacerbate their experiences of discrimination, marginalization, and social exclusion, since religious ideologies in several regions of the country continue to characterize non-conforming gender identities as forbidden or unnatural.

Conversely, Hungary's respondents predominantly identify as Christian (56.52%), although there is a significant disparity in the degree of religious commitment relative to Bangladesh. A notable percentage of respondents (26.09%) in Hungary classify themselves as non-believers, reflecting an elevated degree of secularism and a more diverse perspective on religious identity within Hungarian culture. A minority of Hungarian respondents (17.39%) opted not to reveal their religious affiliation, potentially indicating an increasing trend of religious disaffiliation and secularism in Hungary. Notably, none of the Hungarian respondents identified as Muslims or Hindus, underscoring the prevalence of Christianity in Hungary and the restricted religious variety relative to Bangladesh. The differing degrees of secularism in Hungary may affect the degree to which religious beliefs interact with society views towards transgender individuals. Although Christianity holds considerable influence in Hungary, secularism seems to provide a more permissive atmosphere for individuals to dissociate from religious ties, potentially resulting in a more accepting or neutral perspective on gender variance.

The theological disparities illustrate both the differing degrees of secularism in the two nations and the varied sociocultural frameworks that shape perspectives on gender and identity. In Bangladesh, religious connections may significantly influence society expectations and attitudes towards transgender persons, thereby intensifying stigmatization. In Hungary, the secular character of society and comparatively less religious affiliation may result in divergent perspectives on transgender matters, prioritizing individual rights and liberties. The interaction of religion, culture, and social policy in both nations offers crucial context for comprehending how transgender persons manage their identities and the obstacles they encounter in the job market.

Table 3 demographic information of the respondents.

Attribute values	Number of matching cases (N=46)			
	Bangladesh (N = 23)		Hungary (N = 23)	
	Cases	Percent	Cases	Percent
<i>Age of the respondents</i>				
Below 25	9	39.13	5	21.74
26-35	10	43.48	15	65.22
36-45	4	17.39	2	8.70
46 Above	0	0.00	1	4.35
<i>Sex of the respondents</i>				
Third Gender	9	39.13	0	0.00
Transgender	5	21.74	11	47.83
Transgender Men	4	17.39	7	30.43
<i>Hijra</i>	2	8.70	5	21.74
Transgender Women	3	13.04	0	0.00
Non-binary	0	0.00	0	0.00
None of the above	0	0.00	0	0.00
<i>Religion of the respondents</i>				
Muslim	17	73.91	0	0.00
Hindu	2	8.70	0	0.00
Christian	0	0.00	13	56.52
Not Prefer to say	3	13.04	4	17.39
Non-believer	1	4.35	6	26.09
Others	0	0.00	0	0.00
<i>Education status</i>				
Never went to school	2	8.70	0	0.00
Went primary School	2	8.70	0	0.00
Passed the secondary school	9	39.13	3	13.04
Received the Undergraduate Education	6	26.09	5	21.74
Received the Higher Education	3	13.04	8	34.78
Received the vocational training only	1	4.35	7	30.43
<i>Employment status</i>				
Formally employed – part time	1	4.35	2	8.70
Formally employed- full time	6	26.09	16	69.57
Don't involve any formal employment system	14	60.87	1	4.35
Unemployed	2	8.70	4	17.39

(Source: Author produces, 2024)

The results demonstrate a large disparity in educational levels between the two nations, mirroring the wider socio-economic and cultural factors that influence educational access and

opportunity. In Bangladesh, 26.09% of respondents possess an undergraduate degree, however a significant 39.13% have attained merely a secondary education. This indicates that although a significant segment of the Bangladeshi population has access to basic education, a lesser number advance to higher education.

Notably, 17.40% of respondents said that they had either never attended school or had achieved just the most rudimentary level of education, underscoring a persistent disparity in educational access, especially within underprivileged areas. Merely 13.04% of respondents sought more education beyond their original degrees, showing that chances for ongoing learning and advanced academic attainment are constrained for many. This educational disparity reflects wider systemic obstacles in Bangladesh, where economic limitations, restricted access to quality education, and gender-based inequities may disproportionately hinder transgender individuals' pursuit of higher education and formal employment opportunities.

Conversely, respondents from Hungary exhibit a markedly elevated degree of educational achievement. 34.78% have attained higher education, while 30.43% have finished vocational training. This indicates a more advanced educational infrastructure and a heightened focus on specialized training, frequently associated with increased employment prospects and economic mobility. Hungary's higher education system is more accessible, and vocational training programs appear to be essential in imparting practical skills pertinent to the job market.

Additionally, although 13.04 percent of respondents in Hungary did not complete secondary school, the overall educational levels in Hungary are higher than those recorded in Bangladesh. When compared to Bangladesh, the overall educational levels in Hungary are higher. This difference may be a result of larger social expenditures in education, such as governmental support for vocational programs and tertiary education, as well as a better realization on the part of society of the importance of formal education. In comparison, the educational environment in Bangladesh is still inhibited by problems such as socio-cultural hurdles, economic troubles, and restricted access to excellent educational institutions. These challenges are likely contributing factors to the lower educational achievement among transgender persons.

The two categories are further distinguished by their employment situations. In Bangladesh, only 26.09% of respondents reported obtaining full-time, official employment, while an alarming 60.87% denied participating in any formal employment system. Transgender individuals in Bangladesh face significant challenges due to societal humiliation, discrimination, and inadequate legal protections, which result in high rates of informal

employment and unemployment. This stark disparity underscores the significant challenges they face. The restricted access to official work for transgender individuals may compel many to enter low-wage, precarious, or informal labor markets, thereby hindering their ability to achieve financial stability and social mobility. The circumstances in Hungary appear to be significantly different.

A mere 4.35 percent of respondents in Hungary are without jobs, while a sizeable 69.57 percent of them are working full-time jobs. In light of this, it appears that Hungary's labor market, despite its challenges, offers transgender individuals a stronger potential to get formal and stable employment. The high percentage of full-time workers in Hungary may be an indication of more robust labor protections, more public tolerance, and more inclusive rules protecting the rights of transgender persons in the workplace. This is in sharp contrast to the limited opportunities that are available in Bangladesh.

Furthermore, the data on part-time employment indicates that both nations have very low rates of part-time work, with Bangladesh (4.35%) and Hungary (8.70%) presenting values that fall below the average of several industrialized countries. It is essential to recognize that part-time employment in both nations may be associated with overarching economic conditions and the accessibility of full-time positions. The comparatively low prevalence of part-time employment indicates that individuals in both nations, especially transgender individuals, are more inclined to seek full-time, permanent job or to remain outside the official labor market entirely. Ultimately, unemployment rates in Bangladesh (8.70%) are lower than those in Hungary (17.39%), suggesting the difficulties encountered by Hungary's transgender population in obtaining and retaining employment, despite the nation's superior educational system and increased job prospects.

Perhaps the demographic information shows notable distinctions between respondents from Hungary and Bangladesh in a number of different categories. Hungary has a larger concentration of people in the 26–35 age group than Bangladesh, but both nations' populations were younger overall. Bangladesh has greater diversity in terms of gender identification. Hungary has a higher percentage of non-believers than Bangladesh, where the majority religion was Christianity. More respondents in Hungary have completed higher education or vocational training, indicating a higher level of educational achievement in the country. There was a clear disparity in the employment situation of the respondents from Hungary and Bangladesh, with the former having a higher percentage of full-time workers and the latter having a larger percentage of casual workers. The distinct socio-cultural and economic backgrounds of the two nations were reflected in these discrepancies.

3 Review of international legal instruments that guide Hungary and Bangladesh

Legal frameworks—both international and regional—play a pivotal role in defining labor rights, anti-discrimination standards, and equality of opportunity in the workplace. This chapter reviews selected instruments from the ILO, the EU, and international human rights frameworks to assess their relevance, strengths, and limitations in promoting labor inclusion for transgender individuals in Hungary and Bangladesh. Rather than summarizing legal texts in isolation, the analysis focuses on how these instruments intersect with lived realities of transgender persons and the extent to which they are translated into meaningful protection in each context.

In this section, the researcher emphasizes a number of common international legal guidelines that Hungary and Bangladesh adhere to in order to gain a more comprehensive understanding of the transgender labor situation in both countries. The study underscores the significant impact of global conventions and agreements on the labor rights of transgender individuals in these two countries, underscoring the critical role that international legal frameworks play in influencing national policies. The ILO is one of the most influential international organizations in governing both nations, and it has played a critical role in the promotion of equal gender rights within the labor force.

In numerous countries, including Bangladesh and Hungary, the ILO's conventions, particularly those that pertain to non-discrimination in employment and occupation, serve as a basis for policy development. These global frameworks promote the protection of marginalized groups, such as transgender individuals, to guarantee that they are regarded equitably in the workplace. The initial section of this section delineates the primary ILO frameworks that have influenced labor laws and policies in both Hungary and Bangladesh, underscoring their significance in the development of inclusive work environments for transgender individuals.

Moreover, Hungary is substantially guided by the policies, regulations, and directives of the EU. Hungary's national policies, particularly those concerning employment and labor rights for transgender individuals, are significantly affected by the European Union's legal framework, which encompasses directives on gender equality and anti-discrimination. The legal landscape in Hungary has been significantly influenced by the EU's employment and anti-discrimination laws, which demonstrate its dedication to promoting inclusive workplaces. Consequently, this investigation also examines a number of critical legal scenarios within the European Union that are directly associated with transgender employment and protection instruments. These include the EU's directives on gender equality, the prohibition of

discrimination based on gender identity, and the right to labor in a secure and non-discriminatory environment. The study underscores the substantial influence that supranational organizations have on the formation of national policy and the safeguarding of transgender rights in the labor market by analyzing these EU legal frameworks.

3.1 International Labor Organization (ILO) and the Inclusion of Transgender Individuals in the Workforce

The ILO, founded in 1919 under the Treaty of Versailles and established as a specialized agency of the United Nations in 1946, has long been at the forefront of advancing social justice through labor rights. Its mandate is to promote decent work, eliminate exploitative labor practices, and secure equality of opportunity and treatment for all workers. Over the course of the twentieth and twenty-first centuries, the ILO has adopted a broad range of legal instruments—Conventions and Protocols, which become binding upon ratification, and Recommendations, which provide non-binding guidance. These instruments are complemented by the ILO’s supervisory mechanisms, most notably the Committee of Experts on the Application of Conventions and Recommendations (CEACR). While the ILO has played a central role in establishing equality norms, it has historically framed gender in binary terms and has been slower to integrate the realities of gender diversity and transgender inclusion into its normative system.

Recent developments, however, demonstrate a growing openness within the ILO to address discrimination based on sexual orientation and gender identity. The *2023 General Survey on the Discrimination (Employment and Occupation) Convention, 1958 (No. 111)*, together with related instruments on family responsibilities and maternity protection, provides explicit recognition of gender diversity. The Survey defines gender as encompassing “*each person’s deeply felt internal and individual experience of gender, which may or may not correspond with the sex assigned at birth or the gender attributed to them by society. This includes the personal sense of one’s body*” (Report III, Part B, 2023, p. 54). This formulation aligns the ILO’s interpretive practice with contemporary understandings of gender identity in international human rights law, marking a significant doctrinal shift away from strictly binary categories.

The Survey also acknowledges that “*measures to address discrimination based on sexual orientation and gender identity are also being taken in a number of jurisdictions, where non-discrimination protection has been introduced on the grounds of sexual orientation*” (Report III, Part B, 2023, p. 22, 24). While these observations do not amend the text of ILO

Conventions, they reflect the CEACR’s supervisory approach: encouraging states to extend equality protections to groups not expressly named in the treaty text. Importantly, the Committee emphasizes that effective equality policies often require implementation at the workplace level through “workplace policies and codes of conduct, to prohibit and address discrimination and promote gender equality,” citing examples from Belgium, France, Portugal, Spain, Sweden and Switzerland (Report III, Part B, 2023, p. 123). Such examples demonstrate the ILO’s reliance on both national law and enterprise-level initiatives to operationalize its equality mandate.

Despite these advances, the doctrinal limitations of the ILO framework remain. Convention No. 100 (Equal Remuneration, 1951) and Convention No. 111 (Discrimination in Employment and Occupation, 1958) remain foundational, but neither convention expressly includes gender identity or sexual orientation in their enumerated grounds. The supervisory practice of the CEACR—through observations and direct requests—provides persuasive authority and soft-law guidance, but cannot alter the binding treaty text. Thus, while the ILO has created interpretive space for transgender inclusion, the enforceability of such protections depends on their incorporation into national law or on the existence of stronger regional legal frameworks, such as European Union anti-discrimination directives and the Charter of Fundamental Rights.

In this respect, the ILO provides a minimum floor of protection, while progressive national and supranational legal regimes carry the burden of expanding and enforcing transgender inclusion. As the General Survey highlights, the last century has seen “*tremendous advances for women and men workers, who in many countries have come to enjoy more equal opportunities and treatment at work in a constantly changing world*” (Report III, Part B, 2023, p. 22). The challenge now lies in ensuring that such progress extends beyond binary conceptions of sex and encompasses the lived realities of transgender and non-binary workers.

3.1.1 *ILO Convention No. 100: Equal Remuneration (1951)*

Adopted in 1951, ILO Convention No. 100 on Equal Remuneration calls for equal pay for men and women for work of equal value. It was a landmark in promoting gender equality at a time when wage disparities were not only common but institutionally reinforced across both industrialized and developing economies (Nielsen, 1994). The Convention was a response to long-standing systemic discrimination against women in the labor market and played a vital role in establishing equal pay as a core international labor norm.

However, a key limitation of Convention No. 100 lies in its framing. The language of the Convention explicitly refers to “men” and “women,” omitting any recognition of individuals who identify outside the gender binary (Aeberhard-Hodges, 2019). This reflects the socio-political context of the early post-war era, where gender diversity was not part of mainstream discourse. Consequently, while the Convention remains an essential tool for advancing gender equality, its relevance to transgender and non-binary individuals is significantly constrained. In the absence of an explicit reference to gender identity or expression, states are not obligated under Convention No. 100 to ensure equal remuneration for individuals whose gender identities fall outside the male-female binary (Sony, 2023a).

The challenge is compounded by the fact that many national governments interpret and apply the Convention narrowly. Without proactive reinterpretation or supplementary legislation, transgender individuals may be excluded from protections against wage discrimination. Although some progressive jurisdictions have expanded their domestic understanding of “sex” or “gender” to include gender identity, this is far from universal. Thus, Convention No. 100 must be understood as a partial and outdated framework that requires either formal revision or reinterpretation to address present-day labor rights challenges.

Doctrinally, Convention No. 100 illustrates the limits of textualism in international labor law. Its binary terminology has not been revised since 1951, which means that the treaty cannot, as a matter of positive law, be read as expressly encompassing transgender or non-binary persons. While the CEACR has, in recent General Surveys, encouraged States to adopt gender-neutral approaches to remuneration policies, these comments remain non-binding supervisory interpretations. They guide state practice and provide persuasive authority, but they cannot amend the authentic text of the Convention. This distinction underscores the need to differentiate between binding treaty obligations and supervisory guidance when assessing the legal force of international labor standards.

In comparative perspective, the European Union has moved considerably beyond the binary framing of Convention No. 100. Article 157 of the Treaty on the Functioning of the European Union (TFEU) and Directive 2006/54/EC on equal treatment in matters of employment have established equal pay as a binding principle of EU law, and the recent Pay Transparency Directive (Directive (EU) 2023/970) further strengthens the enforcement of this principle through new reporting and compliance obligations. Moreover, the Court of Justice of the European Union (CJEU) has interpreted sex discrimination provisions to cover discrimination based on gender reassignment (*P v. S and Cornwall County Council*, Case C-13/94) (Council, 1998), thereby extending equal pay protections to transgender individuals.

This illustrates how supranational law can fill normative gaps left by older international conventions, highlighting the dynamic interaction between ILO standards, which set foundational baselines, and EU law, which provides enforceable and evolving protections.

3.1.2 *ILO Convention No. 111: Discrimination in Employment and Occupation (1958)*

Convention No. 111 concerning Discrimination in Respect of Employment and Occupation was adopted by the International Labor Conference on 25 June 1958 and entered into force on 15 June 1960 (Nielsen, 1994). It remains one of the central instruments in the ILO's normative framework on equality. Article 1(1)(a) of the Convention defines the term "discrimination" as:

...any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.

The Convention therefore provides an enumerated list of protected grounds: race, color, sex, religion, political opinion, national extraction and social origin. Notably, sexual orientation and gender identity are not expressly mentioned in the authentic treaty text. Unlike Convention No. 100 on Equal Remuneration, which is confined to wage parity, Convention No. 111 establishes a general obligation upon States Parties to "declare and pursue a national policy designed to promote equality of opportunity and treatment" (Article 2), covering recruitment, training, employment and the conditions of work.

Although the treaty text is silent on sexual orientation and gender identity, questions of inclusivity have been raised in the ILO's supervisory practice. The CEACR, in its General Surveys and in individual observations and direct requests to States Parties, has increasingly urged governments to combat discrimination on the basis of sexual orientation and gender identity. However, it is essential to underline the legal character of such comments.

- **CEACR Observations** are published in the Committee's annual report, submitted through the ILO Governing Body to the International Labor Conference. They contain legal analysis and recommendations, but they are non-binding.
- **CEACR Direct Requests** are communications sent to governments seeking further information or clarification on compliance with ratified instruments. They are not published in the annual report but are publicly accessible in the ILO's NORMLEX database. They do not create binding obligations, nor do they amend the text of the Convention.

Accordingly, while the CEACR has encouraged States Parties to read “sex” in Convention No. 111 in a broad and inclusive manner, such interpretations do not alter the Convention’s binding text. Only formal amendment or the adoption of a new convention by the International Labor Conference could expand the list of protected grounds in a legally binding way.

From a doctrinal standpoint, Convention No. 111 occupies a complex position in the hierarchy of international labor standards. Its provisions are binding upon States Parties once ratified, but its normative force is limited to the enumerated grounds expressly contained in Article 1. Unlike domestic constitutional guarantees or supranational frameworks such as EU law, there is no doctrine of *implied rights expansion* within ILO instruments; the principle of legality requires that treaty obligations be grounded in the authentic text as adopted by the International Labor Conference. This limitation generates several important implications:

1. Textual certainty versus interpretive dynamism.

The closed list of grounds under Convention No. 111 (race, color, sex, religion, political opinion, national extraction, social origin) provides textual certainty, but it simultaneously excludes categories such as sexual orientation and gender identity. The CEACR’s interpretive practice demonstrates a functional effort to bridge this gap by urging States to read “sex” inclusively. However, such interpretive recommendations cannot be equated with textual amendment. In doctrinal terms, they occupy the realm of *soft law*: persuasive, norm-shaping, but non-binding. This distinction is essential to prevent a mischaracterization of supervisory comments as new sources of obligation.

2. Supervisory authority versus law-making power.

The ILO supervisory system is grounded in Article 22 of the ILO Constitution, which requires Member States to report on the application of ratified conventions. The CEACR, in turn, issues observations and direct requests assessing compliance. Yet, these communications do not create obligations *erga omnes*; only conventions and protocols adopted by the International Labor Conference, and ratified by States, possess binding legal effect. Accordingly, doctrinal clarity requires recognizing the CEACR as an expert monitoring body, not a law-making institution. Confusion between supervision and legislation undermines the credibility of legal argumentation.

3. Fragmentation of protection at the domestic level.

Because Convention No. 111 does not explicitly protect against discrimination on the ground of gender identity, national courts and legislatures are left to determine whether transgender persons fall within existing categories, particularly “sex.” This leads to fragmentation: some jurisdictions adopt an expansive reading, while others refuse protection absent express legislative amendment. Thus, doctrinally, the Convention functions as a floor rather than a ceiling, permitting States to go beyond its terms but not compelling them to do so.

4. **Relationship with regional and supranational regimes.**

The limited textual reach of Convention No. 111 must also be situated within the broader normative landscape. In Europe, the binding effect of EU directives and the interpretive authority of the CJEU have already extended protection to transgender persons under the heading of “sex discrimination.” This demonstrates that supranational hard law can effectively fill gaps left by international soft law. The doctrinal implication is that, for EU Member States, Convention No. 111 is less significant as a direct source of transgender rights than as a baseline international obligation. In contrast, for non-EU countries such as Bangladesh, the Convention remains the principal international instrument on workplace discrimination, albeit with significant limitations.

5. **Normative legitimacy and advocacy.**

Finally, the reliance on CEACR observations for the protection of groups excluded from the Convention’s text raises questions of legitimacy. Doctrinally, the persuasive authority of these comments is grounded in the CEACR’s expertise and in the principle of effectiveness (*effet utile*). However, since they lack binding force, their legal weight depends on voluntary uptake by domestic authorities. This creates an advocacy space where civil society actors invoke CEACR interpretations as persuasive guidance, but courts are not legally compelled to follow them.

The doctrinal status, overall, of Convention No. 111 illustrates the tension between binding treaty text and non-binding supervisory practice. It demonstrates how international labor law sets minimum standards while relying on interpretive bodies and domestic incorporation for broader protection. For transgender persons, this means that Convention No. 111 offers recognition of the principle of equality but, without explicit amendment or authoritative interpretive consensus, leaves substantial gaps in enforceable protection.

Further from the Comparative perspective with EU law. The limitations of Convention No. 111 stand in contrast to the more expansive *acquis* of the EU. Article 21 of the Charter of Fundamental Rights of the EU prohibits “any discrimination based on any ground such as sex, race, color, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation.” The use of the open-ended clause “such as” has allowed the CJEU to interpret protection dynamically.

In particular, the landmark judgment in *P v. S and Cornwall County Council* (Case C-13/94) established that dismissal on the ground of gender reassignment constitutes sex discrimination under EU law (Council, 1998). This jurisprudence has been reinforced in subsequent cases, embedding transgender protection within the binding framework of EU directives, notably Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation. Thus, while Convention No. 111 remains foundational in international labor law, the evolution of EU anti-discrimination law demonstrates how supranational legal orders can extend protections more explicitly. The comparative lesson is that international supervisory comments, although normatively influential, do not carry the binding force that EU directives and CJEU case law exert within Member States.

Howsoever, convention No. 111 represents a cornerstone in the international legal architecture of non-discrimination in employment. Nevertheless, its limited textual scope necessitates reliance on interpretive practices and supplementary legal regimes to ensure adequate protection for transgender persons. The divergence between the ILO’s supervisory guidance and the binding legal framework of the European Union illustrates the broader tension between soft law and hard law in advancing equality. For countries such as Hungary, which are simultaneously bound by ILO conventions and by EU law, this creates a dual normative environment in which international standards set the baseline, while supranational law imposes enforceable obligations of broader scope.

3.1.3 *Challenges and Evolving Norms in the ILO Equality Framework*

The ILO’s supervisory system illustrates both the strengths and limitations of international labor law in advancing equality for transgender and non-binary workers. While the ILO has laid down foundational principles of non-discrimination, its mechanisms operate largely through persuasion and guidance rather than binding enforcement, and its conventions continue to reflect the binary categories of the mid-twentieth century rather than the realities of twenty-first-century workplaces.

Direct Requests issued by the CEACR are often misunderstood as legal reforms. In fact, they are non-binding communications directed to governments, intended to clarify ambiguities or encourage compliance with ratified conventions. Unlike Observations, which are published in the CEACR’s annual report to the International Labor Conference, Direct Requests are not printed in the report but are accessible through the NORMLEX database¹. Their authority lies in transparency and dialogue rather than coercion. They may stimulate national debate or even legislative change, but they do not amend the authentic text of conventions or create new binding obligations.

The effectiveness of the ILO’s supervisory process depends heavily on accurate reporting and political will. In Bangladesh, limited administrative capacity and entrenched stigma surrounding transgender identities weaken the translation of international commitments into national practice. In Hungary, recent constitutional amendments restricting legal gender recognition highlight the vulnerability of equality norms to political retrenchment, even within an EU Member State bound by stronger supranational obligations. The CEACR has often drawn attention to implementation gaps. For example, in its 112th Session (2024), it noted the absence of ex ante assessments of economic reforms on employment, equality, and social protection, observing that the most vulnerable groups are frequently left unprotected by such measures (ILC.112/III(A), 2024, p. 52). This underscores a recurring limitation: while the CEACR can expose deficiencies, it cannot compel states to remedy them.

Despite these limitations, the ILO continues to shape global norms. The adoption of Convention No. 190 on Violence and Harassment in the World of Work (2019) represents an important advance, with a comprehensive scope that—though not explicitly referencing gender identity—can be interpreted to shield transgender workers from hostile environments. The CEACR’s 2023 General Survey reflects an even clearer recognition of gender diversity, defining gender as “each person’s deeply felt internal and individual experience of gender, which may or may not correspond with the sex assigned at birth or the gender attributed to them by society” (Report III (Part B), 2023, p. 54). The Survey also documents how constitutions in states such as South Africa, Ecuador, and Fiji now expressly prohibit discrimination on the grounds of sexual orientation and gender identity (*ibid.*, p. 53).

The CEACR has further underscored the importance of addressing intersectional discrimination, noting that individuals belonging to multiple disadvantaged groups face

¹ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:1:0::NO::

compounded inequalities that demand particular consideration (ibid., p. 121). At the workplace level, it has recommended the adoption of inclusive codes of conduct, anti-discrimination training, affirmative action, and the collection of disaggregated data to promote substantive equality (ibid., p. 65, 121). These recommendations, while non-binding, provide a practical roadmap for states and employers seeking to advance diversity and inclusion.

More recent supervisory work demonstrates the breadth of issues now considered under the ILO's equality mandate (III, 2025). In its 113th Session (2025), the CEACR urged stakeholders in the shipping industry to strengthen gender equality through equitable hiring practices and data collection (ILC.113/III(A), 2025, p. 56). The same report expressed concern over weak protections for trafficking victims, referencing the absence of gender-sensitive protocols in some jurisdictions, and drew attention to grave abuses against LGBTQ+I+ persons in Afghanistan under Taliban rule, including arbitrary detention and violence (ibid., p. 636). Such observations highlight both the relevance of the CEACR's equality discourse to contemporary challenges and its reliance on soft-law influence in the absence of binding enforcement powers.

Taken together, these developments illustrate an equality framework that is both evolving and incomplete. Conventions No. 100 and 111 established crucial foundations, but their silence on sexual orientation and gender identity reflects the socio-political context of their adoption and leaves transgender workers without explicit protection. CEACR interpretations and recommendations fill some of these gaps, yet they remain soft law. This creates a patchwork of protection globally: while some states have constitutionalized inclusive equality norms, others criminalize transgender existence. The ILO therefore sets a minimum floor, but effective protection requires national or supranational frameworks willing to go further.

The comparative example of the European Union demonstrates how supranational hard law can provide stronger guarantees. Article 21 of the Charter of Fundamental Rights prohibits discrimination on grounds of sexual orientation, and the Court of Justice in *P v. S and Cornwall County Council* (Case C-13/94) extended protection explicitly to gender reassignment. The recent Pay Transparency Directive (2023/970) further reinforces equal pay principles in ways that directly address gender-based inequalities, including those affecting transgender workers. This binding framework contrasts with the ILO's reliance on supervisory persuasion, highlighting the need for reform at the international level.

For the ILO to realize its vision of "decent work for all," explicit recognition of gender identity and expression in its core conventions is required, alongside stronger mechanisms for

monitoring and technical support for implementation. Until such reforms are undertaken, transgender individuals will remain only partially protected by international labor standards. The ILO's equality framework, while influential, still reflects a transitional stage: from a system rooted in binary gender categories toward one capable of embracing the diversity of contemporary labor markets.

3.1.4 *The Legal Nature of CEACR Supervisory Comments*

A proper understanding, further, of the ILO's supervisory system is crucial for evaluating the extent to which international labor standards can address the challenges faced by transgender persons in employment. The CEACR, established in 1926, examines the reports submitted by Member States under Articles 19, 22, and 35 of the ILO Constitution. Its main outputs are *Observations*, published in its annual report, and *Direct Requests*, confidential communications to governments that are subsequently made publicly accessible through the NORMLEX database. While these comments are highly influential, they must be doctrinally distinguished from binding treaty obligations: CEACR remarks do not amend the authentic text of conventions nor create new legal obligations. Their authority is persuasive rather than legislative.

Recent supervisory practice illustrates both the normative potential and the doctrinal limitations of this system. The CEACR has, in recent General Surveys, advanced a more inclusive understanding of gender identity. In its 2023 General Survey on the Discrimination (Employment and Occupation) Convention, 1958 (No. 111), the Committee defined gender as encompassing “*each person's deeply felt internal and individual experience of gender, which may or may not correspond with the sex assigned at birth or the gender attributed to them by society. This includes the personal sense of one's body*” (Report III (Part B), 2023, p. 54). This articulation, though not legally binding, signals a shift toward recognition of transgender and non-binary workers within the ILO's supervisory discourse. The Survey further noted that several jurisdictions have now introduced non-discrimination protections on the grounds of sexual orientation and gender identity, with constitutional recognition in countries such as South Africa, Ecuador, and Fiji (*ibid.*, p. 53).

The CEACR has also highlighted the problem of intersectional discrimination, noting that “*some individuals or groups of individuals face discrimination on more than one of the prohibited grounds, for example women belonging to an ethnic or religious minority. Such cumulative discrimination has a unique and specific impact on individuals and merits particular consideration and remedying*” (Report III (Part B), 2023, p. 121). For transgender

persons, this is of particular relevance: the compounded disadvantage of gender identity, socio-economic status, and minority status often produces unique vulnerabilities in the workplace. This emphasis on intersectionality demonstrates how supervisory comments can broaden the interpretive horizon of international labor standards, even without altering their binding scope.

In its more recent reporting to the 113th Session of the International Labour Conference (2025), the Committee urged “*all stakeholders to step up efforts to advance gender equality and empowerment in the shipping industry by, among other things, capacity-building, collecting disaggregated data and promoting equitable hiring practices*” (ILC.113/III(A), 2025, p. 56). While the focus here is sector-specific, the principle is general: supervisory comments call on governments and employers to translate equality commitments into operational measures. The same report also addressed deficits in the protection of victims of trafficking, noting with concern the lack of gender-sensitive protocols and appropriate victim support in certain jurisdictions, as well as persistent violations against LGBTQ+I+ individuals, particularly in conflict and authoritarian contexts (ILC.113/III(A), 2025, p. 636). These observations underscore the breadth of issues to which the CEACR applies its equality mandate, ranging from structural workplace practices to grave human rights violations.

Furthermore, in its 112th Session (2024), the CEACR noted the absence of adequate *ex ante* assessment of economic reform policies on employment, gender discrimination, and social protection, urging governments to adopt preventive rather than merely reactive strategies (ILC.112/III(A), 2024, p. 52). This illustrates the supervisory system’s broader concern with how structural economic measures exacerbate inequalities, including gender and identity-based discrimination. The CEACR’s recommendations often extend beyond state policy to enterprise-level practice. The 2023 General Survey recalled that “*national policies on equality often require the adoption of measures at the workplace or enterprise level, such as workplace policies and codes of conduct, to prohibit and address discrimination and promote gender equality*” (Report III (Part B), 2023, p. 121). It further identified effective elements such as the explicit prohibition of indirect discrimination, the collection of sex-disaggregated data, the adoption of affirmative action, and the provision of dissuasive penalties for discriminatory practices (*ibid.*, p. 65). Although not binding, these detailed recommendations serve as practical guidance for states and employers seeking to operationalize equality obligations.

From a doctrinal perspective, then, CEACR comments represent a form of soft law: they lack binding force but exert normative influence by shaping interpretation, guiding domestic reforms, and providing civil society and courts with persuasive reference points. For transgender persons, this soft-law authority can be instrumental in advocacy, but it cannot be

relied upon to guarantee enforceable protections. The binding obligations remain those contained in the Conventions themselves, which, in the case of Convention No. 111, do not expressly include gender identity or sexual orientation. The supervisory mechanism therefore functions as a bridge between the static treaty text and evolving social realities, but it cannot substitute for legislative or treaty reform.

3.1.5 Ratification and Domestic Implementation of ILO Conventions in Hungary and Bangladesh: Implications for Transgender Labor Inclusion

The International Labor Organization's Conventions No. 100 and 111 provide the foundational international framework for promoting equality and non-discrimination in employment. While both Hungary and Bangladesh have ratified these conventions, their domestic incorporation and the scope of protections for transgender individuals differ significantly, reflecting broader structural and legal challenges in ensuring inclusive labor participation.

Bangladesh ratified ILO Convention No. 100 (Equal Remuneration, 1951) on 28 January 1998 and ILO Convention No. 111 (Discrimination in Employment and Occupation, 1958) on 22 June 1972. These conventions have been domesticated primarily through the Bangladesh Labour Act 2006 (as amended), which incorporates provisions on equality and non-discrimination in wages, recruitment, and employment conditions (Islam, 2021). While the Act establishes a general framework for equality, it does not explicitly reference gender identity or sexual orientation. As a result, transgender and non-binary individuals remain particularly vulnerable to workplace exclusion, wage disparities, and discriminatory practices (Al-Mamun et al., 2022; Shah et al., 2024), despite the nominal legal commitment to equality². Enforcement is further complicated by social stigma (Arvind et al., 2022; Aziz & Azhar, 2019), lack of awareness among employers (Islam, 2019), and limited capacity of regulatory authorities (Aksoy et al., 2024), making the practical realization of ILO standards uneven. Consequently, Bangladesh illustrates a scenario in which international conventions establish a minimum floor of protection, yet fail to fully translate into inclusive labor rights for transgender workers without targeted domestic interventions.

Hungary, in contrast, ratified Convention No. 100 on 20 June 1956 and Convention No. 111 on 20 June 1961 (Nyyssönen, 1999; Weichselbaumer & Winter-Ebmer, 2007). Domestic implementation occurs through Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities and the Labour Code (Act I of 2012), both of which prohibit

² https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:1:0::NO::

discrimination in employment on the basis of sex and gender and establish mechanisms for complaints and enforcement (Mink, 2018). These laws provide a stronger institutional framework than Bangladesh for promoting non-discriminatory workplaces. However, similar to Bangladesh, the ILO conventions and domestic legislation in Hungary do not explicitly include gender identity. Moreover, recent statutory and constitutional amendments—such as Act XXX of 2020, which prohibits changes to legal gender markers, and constitutional definitions restricting marriage and adoption to heterosexual couples—illustrate the precarious position of transgender rights within the Hungarian legal landscape (Barát, 2022; "Hungary v European Commission.," 2020). While EU directives and CJEU case law (e.g., *P v. S and Cornwall County Council*, Case C-13/94) provide additional protective mechanisms, the combination of statutory gaps, political retrenchment, and lack of explicit recognition in the ILO conventions exposes transgender workers to interpretative exclusion (Coca-Constantinescu, 2024; Primecz & Pelyhe, 2023), particularly at the intersection of employment and civil rights.

From a comparative perspective, this dual case study demonstrates that ratification alone is insufficient to ensure meaningful labor inclusion for transgender individuals. In both countries, the ILO conventions set a formal baseline, but their textual silence regarding gender identity and sexual orientation limits enforceability. Hungary benefits from supranational legal reinforcement through the EU, whereas Bangladesh relies primarily on domestic law, which lacks explicit coverage and may be constrained by social and cultural norms. These differences highlight the critical role of domestic implementation, interpretive practices, and complementary legal frameworks in translating international standards into protections that are responsive to the lived realities of transgender workers.

Furthermore, the experiences of both countries illustrate the interaction between soft law and hard law mechanisms. The ILO's supervisory comments, General Surveys, and CEACR observations provide normative guidance encouraging states to adopt inclusive practices. However, without explicit incorporation into national legislation, transgender workers remain at risk of exclusion. This emphasizes a central theme of the research: while international instruments like Conventions No. 100 and 111 establish universal principles of equality, the challenges of transgender labor inclusion are primarily shaped by domestic legal structures, social attitudes, and the interplay with regional or supranational frameworks.

In summary, an analysis of Hungary and Bangladesh reveals a structural gap between international labor standards and the effective realization of transgender rights in the workplace. While both countries are formally committed to equality through ILO ratification,

the absence of explicit recognition of gender identity, coupled with contextual legal and societal barriers, perpetuates obstacles to labor market participation. Addressing these gaps requires not only domestic legislative reform but also proactive interpretation of existing conventions, alignment with broader human rights instruments, and enforcement mechanisms capable of translating normative principles into tangible workplace protections. This comparative insight underscores the research objective of examining the challenges faced by transgender individuals in labor participation and the role of international legal instruments in shaping—but not guaranteeing—inclusive labor markets.

3.2 European legal structure and transgender people

Over the course of the last several years, transgender studies in Europe have gained a lot of popularity. During the same time period, there was also interest in a number of social, political, and legal concerns around equal rights. The European Union Agency for Fundamental Rights (FRA) was prompted by these objectives to conduct a thorough poll in 2019, which was released in 2020 and headlined “A long way to go for LGBTQ+ equality.” The survey was conducted across the 28 member states and included 140,000 participants in order to disclose the situation of LGBTQ+ individuals in Europe (FRA, 2020b). Prior to this survey (FRA, 2020b), the FRA also conducted another survey in 2012 in which the initial transgender status was assessed. Focusing on the subject matter of this study, a brief discussion on European transgender status and ignoring the status of other LGBQ people, referencing FRA’s survey report, were discussed to understand transgender status in Europe.

3.2.1 *EU Labor Laws giving priorities Gender Needs*

The EU has endeavored to develop an ideal legislative architecture in order to provide a working environment that is both advantageous and free of discrimination. The Treaty on the Functioning of the European Union (TFEU), EU labor regulations, the European Court of Justice (ECJ), and the European Union Charter of Fundamental Rights (EUCFR) are some of the other resources that are involved in the construction of these institutions. In contrast to the directives that are enacted inside the European Union (EU), which address specific labor and employment concerns, the EUCFR addresses labor issues in a more broad and abstract manner. To present the purpose and role of these legal structures, Monika and Zahra (2020) have provided the following statement in their manuscript titled “The Scope of EU Labor Law”:

EU labor law directives have been adopted over a long period of time (1997-2019), meaning that some of them were adopted under the previous Treaties, while the most recent ones

have the Treaty of Lisbon as their legal basis. Most of the directives adopted between 1997 and 2008 respond to the flexibilization of labor markets and are targeted at establishing minimum standards for equal treatment of workers on different types of contracts (part-time, fixed-term, temporary contracts). Other directives, including the most recent ones, focus on setting minimum standards for working conditions for all workers based on an agreed-upon definition of worker (Working Time Directive, Transparent and Predictable Working Conditions Directive, Work-Life Balance Directive). The role of the European Parliament in the adoption of labor law directives has gradually increased under successive treaties. The Treaty of Amsterdam, which entered into effect in 1999, increased the role of the European Parliament in terms of legislating with the Council, including on employment policy. Under the Treaty of Lisbon (in force since 2009), the role of the European Parliament was further recognized as a full legislator in the ordinary legislative procedure. (p.6)

In line with this view, the current EU labor laws are the product of the long-term modification of several treaties and directives. Seven EU directives have been found (Table 1), between 1997 and 2019, describing labor rights in part-time, fixed term, and temporary contracts. Except for two directives in 2019, the nature of the other directives was to ensure flexibilization of labor markets and minimum standards for equal treatment of workers. Nonetheless, a wider personal scope of the employment relationship can be found in the latest two directives, the Transparent and Predictable Working Conditions (TPWC) (Directive (EU) 2019/1152) and Work-Life Balance (WLB) Directives (Directive (EU) 2019/1158), in 2019, such as “who have an employment contract or employment relationship as defined by the law, collective agreements or practice in force in each Member State, taking into account the case-law of the Court of Justice” (Monika & Zahra, 2020; Risak & Dullinger, 2018). However, only the Employment Framework Directive (Directive 2000/78/EC) has been securing equal opportunity for employment based on different sexual orientations. Based on these discussions, a summarized feature of EU labor law directives is shorted below in Table 4.

Table 4 summary table of EU labor law directives

Directive	Personal scope	(Possible) exemptions
Part-Time Work Directive (1997)	Part-time workers as defined in law, collective agreements or practice of Member States	Part-time workers who work on a casual basis
Fixed-Term Work Directive (1999)	Fixed-term workers as defined in law, collective agreements or practice of Member States	Initial vocational training relationships and apprenticeship schemes, public or publicly supported training, integration and vocational retraining
Employment Framework Directive (2000)	Equal treatment in the European Union (EU) at the workplace regardless of their religion or belief, disability, age or sexual orientation	Ensure that persons of a particular religion or belief, disability, age or sexual orientation do not suffer from discrimination and instead enjoy equal treatment in the workplace.

Working Time Directive (2003)	All workers, private and public sectors of activity	Seafarers, mobile workers, workers onboard a seagoing fishing vessel. Derogations possible (opt outs) for certain sector or by collective agreement
Temporary Agency Workers Directive (2008)	Workers with a contract of employment or employment relationship with a temporary-work agency	Specific public or publicly supported vocational training, integration or retraining program
Transparent and Predictable Working Conditions Directive (2019)	Every worker in the Union with an employment contract or employment relationship - direct reference to European Court of Justice (ECJ) case law	Workers who work less than an average of three hours per week, certain groups of public sector workers, household workers, and seafarers or sea fishermen
Work-Life Balance Directive (2019)	Every worker in the Union with an employment contract or employment relationship – direct reference to ECJ case law	---

(Source: Sony (2023b))

Like the EU directives, the soul instrument of EU labor laws has also been laid in the EU Charter of Fundamental Rights (EUCFR) (Directive 2010/C 83/02). Featuring two major areas, these laws generally try to ensure strong social protection, social cohesion, and an improved standard of living. These include promoting quality working conditions, which include working hours, part-time and fixed-term work, posting, informing and consulting workers about collective redundancies, and transferring companies. To introduce EU labor laws in the book “European Labor Law and the EU Charter of Fundamental Rights” Bercusson et al. (2006),

...two important lessons should be remembered when considering the social and labor provisions in the EU Charter of Fundamental Rights adopted at Nice in December 2000... First, fundamental labor and social standards are determined by the economic and political context. The content of these projects changes with economic and political circumstances. Second, social and labor rights develop when linked to policies promoting European integration, when they find a place on the Community’s integration agenda. (p. 17)

A couple of clauses and articles of the EUCFR generally protect labor rights. Nevertheless, more specific indications of gender-specific priorities in the employment sector are found in Articles 21 and 23 of the EUCFR. The other articles generally act as a guiding principle of the overall nature of equality. Table 5 presents the article and clauses in the EUCFR that are considered a primary labor legal framework in the EU.

Table 5 list of labor laws enlisted in EU Charter of Fundamental Rights (2012/C 326/02)

Article Number	Article Theme	Clauses
12	The freedom of assembly and of association	<ol style="list-style-type: none"> 1. Everyone has the right to freedom of peaceful assembly and to freedom of association at all levels, in particular in political, trade union and civic matters, which implies the right of everyone to form and to join trade unions for the protection of his or her interests. 2. Political parties at Union level contribute to expressing the political will of the citizens of the Union.
15	The freedom to choose in an occupation and right to engage in work	<ol style="list-style-type: none"> 1. Everyone has the right to engage in work and to pursue a freely chosen or accepted occupation. 2. Every citizen of the Union has the freedom to seek employment, to work, to exercise the right of establishment and to provide services in any Member State. 3. Nationals of third countries who are authorized to work in the territories of the Member States are entitled to working conditions equivalent to those of citizens of the Union.
21	Nondiscrimination	<ol style="list-style-type: none"> 1. Any discrimination based on any ground such as sex, race, color, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited. 2. Within the scope of application of the Treaties and without prejudice to any of their specific provisions, any discrimination on grounds of nationality shall be prohibited.
23	Equality between men and women	Equality between women and men must be ensured in all areas, including employment, work and pay. The principle of equality shall not prevent the maintenance or adoption of measures providing for specific advantages in favor of the underrepresented sex.
27	Workers' right to information and consultation within the undertaking	Workers or their representatives must, at the appropriate levels, be guaranteed information and consultation in good time in the cases and under the conditions provided for by Union law and national laws and practices.
28	Right of collective bargaining and action	Workers and employers, or their respective organizations, have, in accordance with Union law and national laws and practices, the right to negotiate and conclude collective agreements at the appropriate levels and, in cases of conflicts of interest, to take collective action to defend their interests, including strike action
30	Protection against unjustified dismissal	Every worker has the right to protection against unjustified dismissal, in accordance with Union law and national laws and practices.
31	Fair and just working conditions	<ol style="list-style-type: none"> 1. Every worker has the right to working conditions which respect his or her health, safety and dignity. 2. Every worker has the right to limitation of maximum working hours, to daily and weekly rest periods and to an annual period of paid leave.
32	Prohibition of child labor and protection of young people at work	“Horizontal” provisions. The employment of children is prohibited. The minimum age of admission to employment may not be lower than the minimum school-leaving age, without prejudice to such rules as may be more favorable to young people and except for limited derogations. Young people admitted to work must have worked conditions appropriate to their age and be protected against economic exploitation and any work likely to harm their safety, health or physical, mental, moral or social development or to interfere with their education.

(Source: Sony (2023b))

However, considering the main argument of this study, gender priorities, along with LGBTQ+ issues, in EU labor laws have been found only in a few legislations. Except for the Employment Framework Directive (Directive 2000/78/EC), none of the EU directives have highlighted the term sexual orientation association with equal treatment in the labor sector. To

ensure equal treatment in employment and occupation irrespective of religion or belief, disability, age, or sexual orientation, both direct and indirect discrimination were included. For direct discrimination, the directive (Directive 2000/78/EC) meant differential treatment based on a specific characteristic, and for indirect discrimination, it meant any provision, criterion, or practice that is neutral but puts the people in the above categories at a disadvantage compared to others. In addition, this directive (Directive 2000/78/EC) characterized harassment as a form of discrimination that creates a hostile environment.

Specifically, these directives (Table 4) have penned down several employment discrimination criteria, such as recruitment conditions and promotions, vocational training, employment and working conditions, and involvement in the organization. Nevertheless, this instruction did not succeed in protecting persons from being denied employment owing to their sexual orientation or from being embarrassed by a coworker at work for a variety of reasons. Therefore, ILGA Europe, who works for LGBTQ+ people's equality in Europe, has critiqued the EU in several ways (Sony, 2023b). Regrettably, the legislation of the European Union does not yet include a provision that expressly prohibits discrimination on the basis of a person's gender identity or gender expression. The European Union is only authorized to take action to prevent "discrimination based on sex, racial or ethnic origin, religion or belief, disability, age, or sexual orientation" in accordance with the treaties that govern the EU. Transgender concerns are not included in any of these treaties. In addition, the European Union Charter of Fundamental Rights does not have a provision that prohibits discrimination against transgender individuals (ILGA-Europe, 2019).

In addition to abolishing gender discrimination, EU laws have introduced two additional directives (i.e., 2006/54 and 2004/113) ignoring transgender needs and placing only men's and women's needs, which also raises the question of priorities of gender in EU laws. For instance, Directive 2006/54/EC of the European Parliament and of the Council, while a significant step in addressing gender equality, focuses exclusively on the equal treatment of men and women. This binary approach fails to recognize the needs and challenges of transgender and non-binary individuals, thereby leaving a gap in its inclusivity. Such omissions raise critical questions about the EU's prioritization of gender issues and the extent to which its legislative framework accommodates diverse gender identities in labor rights.

In addition, when investigating for gender priorities, it was discovered that in 2008, the European Commission (EC) presented a proposal of directives to a Council Directive. This proposal was produced in order to provide priority to both genders. Nevertheless, the most recent two directives, the Transparent and Predictable Working Conditions Directive (2019)

and the Work-Life Balance Directive (2019), have addressed both men and women by referring to all workers in situations where LGBTQ+ priorities are not highlighted as specific genders who are addressing their labor rights. Unlike ILGA Europe or other scholars, the European Commission (EC) believed that there is sufficient legal basis for securing all gender needs in the employment sector in the EU. As a shred of evidence on the EC (2022) website, two legal bases can be found. First, the prohibition of discrimination based on sexual orientation was found in article 21 of the EUCFR. Second, Article 19 of the TFEU agreed to take action to combat any type of discrimination based on sex, race, and ethnic origin.

Apart from this, the EC has also mentioned directive 2000 as a legal instrument of protection for the workplace for all genders. However, ILGA Europe has criticized this directive since it fails to protect itself from job denial and harassment, such as bullying by fellow workers. However, at this point in our discussion, a question can call upon in mind whether these legal structures can give equal gender priorities in the employment sector. In a direction consistent with this view, this study tries to analyze some recent reports that have highlighted the different gender statuses in the employment sector.

3.2.2 Nature of different gender priorities addressed in the EU employment sector.

Unlike other development organizations, the EU generally works in better ways to ensure a nondiscriminatory place for all genders by law. Subsequently, through some of the latest reports in the EU highlighting the status of gender equality in helping policymakers tackle gender inequalities in Europe, it has been found that women are enjoying greater inclusion in the employment sector. For instance, according to Eurostat (2020a), in 2019, an 11.7 percent employment gap was found between men and women among the 27 countries of Europe. This gap slowed by 4.6 percent between 2019 and 2005.

Again, this report highlights that obtaining a job for rural women is more difficult than obtaining a job for women in cities. However, in this report, no data have shown a gender-based employment gap between LGBT individuals and individuals in the other binary gender groups. At the same time, FRA (2020b) found that in 2019, 11 percent of LGBTQ+ people faced difficulties accessing the labor market in the EU, and 21 percent of respondents in the same survey felt discriminated against at work. In particular, 36 percent of transgender individuals have reported that they have been discriminated against in the workplace (FRA, 2020). In addition, discrimination in the workplace based on sexual orientation increased 13% to 17% between 2012 and 2019 (FRA, 2020). This situation illustrates the practical limitations of legal endeavors.

Ironically, according to European Commission Directorate-General for Justice Consumers (2021), the EU and its Member States have targeted a milestone of a 75 percent employment rate for women and men under the Europe 2020 strategy, but they forget about integrating other sexual minority people into this strategy. Although, for a while if we ignore the LGBTQ+ issues from our discussion, it seems that the EU has a higher standard of legal basis to uphold women's employment, the score of the Gender Equality Index published by the European Institute for Gender Equality (2020) shows a slow improvement in women's situation in the labor market since the score increased from 70 in 2005 to 72.2 in 2020.

Parenting can be an essential determinant of understanding gender priorities in labor law. According to this EC, 14.3 percent of women who have a child under 6 years of age were employed, and the advantage of such a situation increases men's employment rate by approximately 9.6% (European Commission, 2020). In line with this view, one of a recent directives named "Work-Life Balance for Parents and Carers" (Directive (EU) 2019/1158), also found in the EU with a legal basis for the directive, is Article 153(2) TFEU, in conjunction with point (i) of Article 153(1) TFEU. Apart from that, the annual report on gender equality in the EU found the highest gender gap between married men and women with children and the lowest between men and women who are unmarried and have no children in the household (Grubanov-Boskovic et al., 2020).

Moreover, European Commission (2020) reported a greater sex difference in young people aged younger than 30 years than in those aged 30-40 years (p. 48). During the epidemic, surveys revealed that 29 percent of working women with young children found it difficult to focus on their jobs due to family obligations, whereas 16 percent of working men were in the same position (Eurofound, 2020). During the COVID-19 epidemic, women are more likely to pare corners on their job hours or quit entirely to care for their children (Alon et al., 2020b). To address such gender needs, no such legal structure has been found in the EU.

In a similar vein, following the Proposal for a Joint Employment Report 2021 from the Commission to the Council by the EC, it has become clear that existing laws and regulations of the EU cannot minimize the gender gaps in the employment of women with disabilities, women from migrant communities or other minority groups, women with children or mothers with dependent children, women in vulnerable situations or disadvantaged people such as young and older women. Like a shred of evidence, according to the Gender Equality Index by European Institute for Gender Equality (2020), in the EU, women with disability generally have a low probability of obtaining full-time equivalent employment, and in terms of the gender gap, the rate is 21 percent compared to 29 percent for men with disability.

Again, nonbinary sexually oriented individuals' needs in the labor market should be met. The EC believes that the prohibition of discrimination based on sexual orientation and ensuring equal job opportunity can be possible under the existing legal framework. However, reports showing the status of LGBTQ+ in Europe present a different scenario. For instance, in 2019, a comprehensive report showed that 58% of LGBTQ+ people had suffered in the workplace (FRA, 2020). In addition, 46 percent of transgender people, 60 percent of intersexual people, 29 percent of lesbian people, and 46 percent of bisexual people reported being harassed because of their specific sexual orientation. One-fourth of LGBTQ+ people usually hide their identity in the workplace. FRA highlighted the following statement of lesbians in Poland:

When my boss determined that I was gay, she didn't fire me (of course, she couldn't), but she just started to do everything, so I would quit myself. She needed a month to break me – I did actually quit, and she reached her goal. (p. 31)

Similarly, 35 percent of transgender people and 32 percent of intersex people used to face harassment in the workplace (FRA, 2020b). One of the most prevalent forms of harassment that occurred in the workplace was the use of homophobic insults. According to the European Union (EU), there are certain rules and regulations that have the potential to prevent the propagation of homophobic waves within the same building. In order to provide support for this viewpoint, the FRA presents another comment made by a young homosexual male from Sweden,

I hear about homophobic comments almost every day at work; if not every day, it is definitely every other day. It gets so hard, sometimes you feel very ostracized that you are not normal according to them. (p. 32)

The FRA report's findings, which concentrate on a variety of grounds of discrimination, demonstrate the intricate and multifarious nature of the discrimination experienced by LGBTQ+ individuals. LGBTQ+ individuals encounter discrimination on a variety of intersecting levels, similar to women and ethnic minorities. The report emphasizes that there are presently no comprehensive legal frameworks in place to adequately safeguard LGBTQ+ individuals from the multifaceted discrimination that they face. One of the most alarming discoveries is that 36% of LGBTQ+ individuals are not only subjected to discrimination based on their sexual orientation or gender identity, but they also encounter supplementary obstacles, such as disabilities.

This intersectionality demonstrates the compounded nature of discrimination, in which individuals are marginalized by their physical or mental health conditions and their LGBTQ+

status. The unique challenges that these overlapping sources of discrimination create cannot be completely addressed by laws or policies that concentrate merely on one form of prejudice. This serves to emphasize the necessity of more nuanced and inclusive legal protections that take into account the diverse identities and experiences of marginalized groups.

Similarly, 40% of ethnic minorities within the LGBTQ+ community experience discrimination due to their ethnic origin, which underscores an additional critical stratum of disadvantage. These individuals are not only marginalized due to their sexual orientation or gender identity, but they also encounter prejudice and ethnic bias. These individuals are at an even greater disadvantage in society, whether in the workplace, healthcare settings, or daily life, as a result of the dual or multiple forms of discrimination. This discovery underscores the intersectional and profoundly ingrained nature of discrimination, which necessitates marginalized individuals to navigate numerous systems of inequality. In order to guarantee the complete inclusion of all individuals, the FRA's report underscores the necessity of policies that not only safeguard against discrimination based on sexual orientation and gender identity, but also address the compounded effects of other forms of prejudice, including racism, ableism, and ageism.

Additionally, the report indicates that a substantial number of LGBTQ+ individuals (41%) are wary of reporting discrimination for fear of being misconstrued or further stigmatized. The cycle of discrimination and invisibility is perpetuated by the fear of retaliation or social rejection, which prevents many individuals from seeking legal recourse or support. The unwillingness to disclose such mistreatment emphasizes a critical deficiency in the enforcement of anti-discrimination laws and policies. The absence of a secure, supportive environment in which victims can report these incidents without fear of further marginalization or reprisal remains a substantial obstacle, despite the existence of laws that exist to safeguard individuals from discrimination. This emphasizes the necessity of more robust systems that not only safeguard LGBTQ+ individuals through legislation but also cultivate a culture of acceptance, in which individuals feel empowered to speak out against discrimination without the fear of further being marginalized.

Moreover, in terms of economic activity status, this study further revealed that there was unequal treatment as well as the participation of different genders in different sectors. In Europe, 34.4% of women are self-employed and women are start-up entrepreneurs, according to the report of WEGate (2020), despite having more than half of the European population been women. No official record has been found associating female entrepreneurship and participation in innovation.

However, to accelerate this process, the EC has adopted a new strategy under the platform of WEGate (2020), which emphasizes that digital skills are encouraged by women to be entrepreneurs and take part in innovation. No such quality improvement program or policy for LGBTQ+ people has been found in the EU. Similarly, understanding the unadjusted gender pay gap, only 2018 data have been found in Eurostat (Eurostat, 2020b). According to Eurostat (2020c), women in the EU earn an average of 86 cents for every euro a man earns. Likewise, by 2018, the pension gap between men and women was 29.5 percent throughout the EU (Eurostat, 2020c).

No official records of the LGBTQ+ people's wage gap or pension gap have been found in the EU, which reflects the lack of consciousness of policymakers. Nevertheless, through the report of FRA (2020b), it can be found that, in 2019, 41 percent respondents were involved in paid work, 7 percent of survey participants were self-employed, 1 percent respondents were engaged in unemployed as well as volunteer works, and the percentage of unemployed LGBTQ+ people were 5. In addition, in the survey of FRA (2020), only 1 percent of intersex respondents were involved in civilian service. Unlike in this scenario, the unemployment ratio in 2020 among women increased from 6.9 percent in April to 7.9 percent in September, whereas male unemployment increased from 6.5 percent to 7.1 percent in the same period (Eurostat, 2020d).

In this circumstance, two perspectives may emerge: either existing legal frameworks fail to define all gender demands or existing legal frameworks do not function well in practice. However, to draw a single conclusion, a lack of comprehensive material has limited this study. Instead of drawing a single conclusion, this study has opened the ground that may guide legislators and researchers to conduct a comprehensive survey on this framework.

Elimination of a discriminating working environment for everyone of all genders is a common goal of all national and international organizations. Consequently, several legislative initiatives in the form of different policy and legal measures are generally found in every organization that tries to ensure a healthy labor market through protecting labor rights. However, the effectiveness of these legal initiatives also remains a matter of assessment. From this point of view, this study aimed to understand how different genders' needs have been given priority in EU labor laws and practice.

Unlike most of the literature, to assess the existing labor laws, this study has tied to addressing gender needs based on individuals' sexual orientation. Serious wage gaps between males and females regarding parental leave, obtaining jobs, and receiving promotions have been found through reviewing some of the latest EU-funded reports. At the same time, it has

also been seen that none of the comprehensive surveys presenting LGBTQ+ people's employment status have found supporting the existing directives to call attention to LGBTQ+ labor right in the EU. Subsequently, more than half of the respondents in the latest FRA survey reports faced discrimination and harassment both from getting a job and from accessing the workplace. Increasing homophobic attitudes in the workplace was also another consequence of the weakness of the existing system.

There were no integrated and complete survey results that emphasized labor status based on diverse sexual orientations; this study was limited in its ability to provide a thorough comparison between legislation and practice. Hence, it is recommended that the EU adopt a comprehensive legislative manifesto by integrating men and women along with the LGBTQ+. In addition, by examining existing works, this study proposes that legislative steps be taken to protect women's and LGBTQ+ workers' labor rights in terms of minimize pay inequalities and pension discrepancies. To be here, further measures need to be taken to enhance the participation of women and LGBTQ+ persons in entrepreneurship and creative professions. More research on the multifaceted and diverse grounds of labor discrimination is needed.

3.3 The Yogyakarta Principles and Their Relevance to Transgender Labor Inclusion

The Yogyakarta Principles on the Application of International Human Rights Law in Relation to Sexual Orientation and Gender Identity (2007) are a set of non-binding soft-law guidelines intended to clarify how existing international human rights standards apply to issues of sexual orientation and gender identity (Carpenter, 2020). Although these Principles do not carry the legal force of treaties, they provide authoritative guidance for states, policymakers, and civil society organizations in promoting equality, combating discrimination, and ensuring the rights of LGBTQ+ individuals are respected and protected (Carpenter, 2020; O'Flaherty & Fisher, 2008).

Principle 12 of the Yogyakarta Principles is particularly relevant to this study, as it explicitly affirms the right to work. It states that everyone has the right to the opportunity to gain a living by work freely chosen or accepted, without discrimination based on sexual orientation, gender identity, or gender expression. The Principle further obliges states to implement measures to eliminate barriers that transgender and gender-diverse individuals may face in employment, including discriminatory recruitment practices, unequal pay, and hostile workplace environments. While the Principles are not legally enforceable, they serve as a normative framework that can influence legislation, policy, and workplace standards, providing a benchmark for evaluating state compliance with international human rights norms.

In the context of Hungary, the Yogyakarta Principles align with broader international and regional commitments (Nyúl, 2025), including the ICESCR, CEDAW, and EU anti-discrimination directives. However, despite recognizing the Principles as part of its normative human rights framework, Hungary has adopted statutory and constitutional measures that restrict transgender rights, such as Act XXX of 2020, which prohibits legal gender recognition, and constitutional definitions of marriage and adoption that exclude same-sex couples (Barát, 2022; Kaszás, 2020). These domestic restrictions illustrate a gap between soft-law guidance and national implementation: while Hungary is normatively committed to promoting inclusive labor practices, transgender individuals continue to face legal and structural barriers that limit full access to employment opportunities.

In Bangladesh, the Yogyakarta Principles provide an important reference point for advancing labor rights for transgender individuals, particularly in light of the country's ratification of ILO Conventions No. 100 and 111. However, as in Hungary, these soft-law guidelines have not yet been fully translated into domestic protections. The Bangladesh Labour Act 2006 (as amended) incorporates general equality and non-discrimination provisions, but it lacks explicit references to gender identity or sexual orientation. Social stigma, limited awareness, and the absence of targeted policy measures further constrain the practical impact of the Yogyakarta Principles, leaving transgender workers vulnerable to discrimination, marginalization, and unequal access to the labor market (Al-Mamun et al., 2022; Aziz & Azhar, 2019; Rahman et al., 2025).

Overall, the Yogyakarta Principles function as a normative benchmark for both countries, highlighting international expectations regarding transgender inclusion in the workforce. For this study, they provide a conceptual framework to analyze the challenges faced by transgender individuals in accessing employment, and to assess how Hungary and Bangladesh interpret, adapt, or fail to implement these soft-law obligations in practice. By comparing the two countries, the research illuminates the gap between international human rights guidance and domestic labor realities, and underscores the importance of integrating both legal and social measures to ensure effective protection for transgender workers.

3.4 The EU Anti-Discrimination Framework: Legal Obligations and Doctrinal Gaps

The European Union has developed a sophisticated body of anti-discrimination law, which complements and, in many respects, surpasses the standards established by the ILO. While the ILO relies on supervisory persuasion and soft-law interpretations, the EU possesses binding legislative and judicial mechanisms that require Member States to transpose and apply non-

discrimination guarantees within domestic legal systems. This section examines the doctrinal development of EU anti-discrimination law, with particular focus on Directive 2000/78/EC, the Charter of Fundamental Rights, the Court of Justice of the European Union (CJEU) jurisprudence, and the newly adopted Pay Transparency Directive (EU) 2023/970. The analysis highlights both the strengths of the EU legal framework in offering robust protection and its persistent doctrinal gaps with regard to transgender and non-binary individuals.

The Employment Equality Directive (Directive 2000/78/EC) remains the cornerstone of EU labor non-discrimination law. It prohibits direct and indirect discrimination on grounds of religion or belief, disability, age, and sexual orientation in employment and occupation. Article 21 of the Charter of Fundamental Rights of the European Union further expands this protection by prohibiting discrimination on a wide range of grounds, including sex and sexual orientation. Yet, despite these advances, the omission of explicit reference to “gender identity” or “gender expression” creates a doctrinal ambiguity (Križan, 2024). The Charter has been interpreted expansively, but its binding effect depends on the scope of EU law; it does not extend universally to Member States acting outside EU competences.

The CJEU has played an essential role in bridging some of these textual gaps. In *P v. S and Cornwall County Council* (Case C-13/94), the Court held that the dismissal of a transgender worker undergoing gender reassignment constituted direct discrimination on grounds of sex. This judgment was groundbreaking, as it extended the scope of EU sex equality law to include transgender persons, despite the absence of an explicit legislative provision. Subsequent cases, such as *MB v. Secretary of State for Work and Pensions* (Case C-451/16)³, reaffirmed this trajectory, confirming that gender reassignment is covered under the principle of equal treatment between men and women. However, this case-law approach remains piecemeal, reactive, and dependent on litigation, rather than establishing comprehensive legislative clarity.

A significant recent development is the adoption of Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023, aimed at strengthening the application of the principle of equal pay for equal work or work of equal value between men and women (OJ L 132, 17.5.2023, p. 21–47). The Directive obliges Member States, by 2026, to implement binding measures that increase pay transparency, including the right of workers

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62016CJ0451>

to obtain information on pay levels, obligations on employers to conduct pay reporting, and sanctions for non-compliance.

Article 5 of Directive 2023/970 mandates employers to ensure that “job evaluation and classification systems are gender-neutral,” while Article 9 requires employers with more than 250 employees to publish gender pay gap reports. Importantly, Article 11 introduces a joint pay assessment obligation where pay gaps exceeding 5% are not objectively justified. These provisions create a structural mechanism to address systemic wage disparities, moving beyond individual claims towards proactive employer obligations.

However, despite its progressiveness, the Directive retains a binary conception of gender, as its scope is framed around “men and women.” This mirrors the limitations of Convention No. 100 of the ILO. While the Directive could be interpreted in line with CJEU jurisprudence to cover transgender workers under “sex discrimination,” its text does not explicitly mention gender identity or expression. From a doctrinal standpoint, this omission represents a lost opportunity to bring EU law into alignment with contemporary understandings of gender diversity, as reflected in CEACR guidance and national constitutions in states such as Ecuador, Fiji, and South Africa.

The contrast between EU and ILO approaches is instructive. Whereas the ILO relies on Direct Requests and Observations as tools of soft persuasion, the EU creates binding directives that national governments must implement, under the supervision of the CJEU. This “hard law” approach offers significantly greater legal certainty and enforceability. Yet, the doctrinal content of EU law often lags behind ILO supervisory discourse. The ILO’s General Survey of 2023 explicitly defined gender as including “each person’s deeply felt internal and individual experience of gender, which may or may not correspond with the sex assigned at birth” (Report III (Part B), 2023, p. 54), whereas EU secondary legislation remains entrenched in binary formulations.

Thus, the paradox emerges: the EU framework is more enforceable but less conceptually inclusive, while the ILO framework is more progressive in interpretative scope but weaker in binding effect. Transgender workers therefore face uneven protection depending on whether their rights are framed within EU hard law (robust but textually narrow) or ILO soft law (inclusive but non-binding).

The Pay Transparency Directive is particularly relevant in the Hungarian context, where gender wage gaps remain persistent and recent constitutional amendments have restricted legal gender recognition. While Hungary will be legally obliged to transpose Directive 2023/970 into national law, the Directive’s silence on gender identity means that

transgender workers may still lack explicit protection. The compatibility of Hungary's restrictive measures with EU equality law remains an open legal question, especially in light of *P v. S*, which firmly established that transgender discrimination constitutes sex discrimination under EU law.

The EU's anti-discrimination framework represents a powerful counterbalance to the ILO's weaker supervisory system, but it suffers from doctrinal gaps that risk excluding transgender and non-binary individuals. While the Pay Transparency Directive strengthens enforcement of equal pay, its reliance on binary gender categories exemplifies the persistence of outdated legal assumptions. Unless future legislative reforms explicitly integrate gender identity and expression, EU law will continue to rely on judicial interpretation to fill the gap. This reliance is inherently uncertain and fails to provide the comprehensive and inclusive protection that international human rights standards now demand.

3.4.1 Overall Legal Transgender Rights in Hungary

Hungary presents a paradoxical case in the European landscape: while its constitutional and statutory framework acknowledges equality and anti-discrimination in general terms, recent legislative changes have curtailed the rights of transgender persons, particularly with regard to legal gender recognition. This tension highlights the fragility of equality guarantees in domestic labor law when measured against the standards of the European Union and international human rights law.

Article XV of the Fundamental Law of Hungary enshrines the principle of equality before the law and prohibits discrimination “on any ground,” including sex. In addition, Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities provides the general domestic anti-discrimination framework, prohibiting both direct and indirect discrimination in employment, education, and access to goods and services. However, the Act does not explicitly reference “gender identity” or “gender expression” as protected categories, relying instead on an interpretation of “sex” that, in practice, has not been extended to cover transgender individuals.

This gap was widened by the 2020 amendment to Article 33 of the Fundamental Law, which replaced the category of “sex” with “sex assigned at birth” in civil registry law. As Kállai (2020) observes, this legislative change effectively eliminated the possibility of legal gender recognition, making it impossible for transgender persons to amend official documents to reflect their lived gender identity. The consequences for labor law are direct and severe:

mismatched identity documents expose transgender employees to harassment, undermine their right to privacy, and impair their ability to secure employment consistent with their identity.

Moreover, from the Employment Relationship point of view, Hungarian labor law formally guarantees equal treatment in employment through the Labor Code (Act I of 2012). However, as Zaccaria (2022) notes in *The Concept of Employee in Hungarian Law in Light of Its Broad Interpretation in EU Law*, the Hungarian system conceptualizes the employment relationship narrowly, as a private law contract that exclusively generates employee status and the rights attached to it. This rigid construction of “employee” means that access to employment rights is entirely mediated by the formal employment contract, leaving little room for broader interpretations that might capture precarious work or discriminatory practices in access to employment.

Compared with EU law, where the CJEU has consistently adopted a broad and functional definition of “worker” (notably in *Lawrie-Blum* and subsequent judgments), Hungarian law is restrictive. For transgender persons, who already face significant barriers to entering formal employment, this restrictive concept exacerbates exclusion. The absence of recognition of gender identity within the framework of equal treatment compounds the problem, since employers are not legally obliged to respect the self-identified gender of employees.

At the supranational level, Hungary is bound by Directive 2000/78/EC, which prohibits discrimination in employment on the basis of, inter alia, sexual orientation. However, the Directive does not explicitly reference gender identity. The CJEU has partially closed this gap, beginning with *P v. S* and *Cornwall County Council* (Case C-13/94), where dismissal due to gender reassignment was found to constitute sex discrimination under the Equal Treatment Directive. Subsequent jurisprudence has cautiously extended protection for transgender persons, but the absence of an explicit reference to gender identity in EU directives leaves national discretion. Hungary has chosen a restrictive approach, limiting protection to cisgender categories of “male” and “female” as defined by birth registration.

Recent EU legislative developments highlight the growing gap between Hungary and European standards. Directive (EU) 2019/1152 on transparent and predictable working conditions embodies principles articulated in the European Pillar of Social Rights, aiming to ensure fairer and more inclusive labor markets. As Zaccaria (2022) demonstrates in *Connections between the European Pillar of Social Rights and Hungarian Labour Law*, Hungary’s transposition of Directive 2019/1152 has been formalistic and incomplete, reflecting a reluctance to fully embrace the expansive interpretation of worker rights envisaged

by the EU. For transgender employees, this transposition deficit is particularly stark: while the Directive promises predictability and fairness for all workers, in Hungary the exclusionary framework of legal gender recognition undermines its application in practice.

The Hungarian courts have offered limited guidance on the intersection of labor rights and transgender identity. Unlike other European jurisdictions, where constitutional courts or equality bodies have interpreted anti-discrimination norms to include gender identity (e.g., Germany, Spain, Malta), Hungary's judiciary has largely deferred to the restrictive constitutional amendment of 2020. The abolition of the Equal Treatment Authority in 2021 and its merger into the Commissioner for Fundamental Rights has further weakened independent oversight, limiting opportunities for transgender persons to challenge discrimination.

By contrast, the CJEU has continued to develop an expansive body of equality jurisprudence. As Zaccaria (2015) argues in *Equal Employment in Practice – Which Way Forward?*, the Court's case law demonstrates that equal employment cannot be reduced to a formal prohibition of discrimination; it requires an evolving interpretation that accounts for the lived experiences of marginalized groups. This interpretative dynamism is precisely what is lacking in Hungary, where both legislative and judicial developments have reinforced a binary and exclusionary framework.

The Hungarian framework therefore illustrates a profound disjunction between domestic labor law and European equality standards. On the one hand, Hungary formally maintains anti-discrimination provisions and has ratified ILO Convention No. 111. On the other hand, the refusal to recognize gender identity in civil status law undermines these protections in practice, creating structural barriers to equal employment. The combination of a narrow concept of "employee," a restrictive reading of "sex" under equality law, and the absence of judicial willingness to interpret domestic law in light of CJEU case law results in a framework that is formally aligned with EU law but substantively exclusionary.

In comparative perspective, Hungary exemplifies a regression model: it has moved from partial recognition of transgender rights to outright denial, contrary to broader European trends of inclusion. This regression not only undermines the principle of equal treatment in domestic labour law but also raises questions about Hungary's compliance with its EU obligations. The situation underscores the importance of adopting explicit legal protections for gender identity at both EU and national levels, without which the European promise of "decent work for all" remains hollow for transgender individuals in Hungary.

In recent years, the legal situation for transgender individuals has been marked by substantial setbacks, despite the fact that LGB individuals have acquired rights in some areas.

Hungary's legal framework had previously made progress in certain aspects of transgender rights; however, the situation underwent a significant transformation in 2020. A controversial amendment to Article 33 of the Fundamental Law was enacted by the Hungarian government. This amendment effectively prohibited transgender individuals from legally altering their gender on official documents. The law now requires that the designation of "sex" on official documents be substituted with "sex assigned at birth" as a result of the revision of Article 33.

Likewise, in addition to being transgender, LGB people can also serve in the military. The Hungarian government banned *de facto* debt in 2018, and by 2020, it banned *de jure*, which means prohibiting the right to change legal gender by revising Article 33 (Kállai, 2020). The change presented transgender individuals with substantial legal and social obstacles, rendering it significantly more challenging for them to navigate bureaucratic systems and access public services, healthcare, and employment opportunities that are consistent with their gender identity. The broader trend in Hungary toward restricting transgender rights is exemplified by this legal shift, despite the country's previous efforts to achieve gender equality for other groups, such as LGB individuals.

Beyond the issue of gender identity recognition, Hungary's legal framework for transgender rights has faced other challenges. In 2020, the government banned same-sex couples from adopting children, both for stepchild adoption and joint adoption, further entrenching the restrictions on LGBTQ+ rights in Hungary. While these changes primarily affect the family and adoption laws, they also reflect the Hungarian government's broader reluctance to embrace full equality for sexual and gender minorities. Despite these legal setbacks, Hungary still provides significant legal protections for LGB individuals, and the country's broader legal infrastructure, such as employment and anti-discrimination laws, remains in place.

Nevertheless, the specific challenges encountered by transgender individuals are not adequately addressed by these protections. A substantial lacuna in the legal framework of Hungary is underscored by the absence of explicit and detailed provisions regarding gender identity in Hungarian laws. The protection of transgender individuals is still not prioritized in the same manner as other LGB rights. The challenge that transgender individuals encounter in achieving equal rights and opportunities in the workforce is further exacerbated by the lack of legal recognition of gender identity in public documents.

Hungary's legal framework underscores the principal of equitable treatment, which is enshrined in its Constitution, which is referred to as the Fundamental Law, in addition to the national legislation. The Constitution upholds the right to equal treatment for all citizens and

prohibits discrimination on a variety of principles, including gender. Nevertheless, the nuanced issues that transgender individuals encounter in Hungary are not explicitly addressed by this generic provision. The Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities is another critical piece of national legislation that is designed to address discrimination, particularly in the realms of education, employment, and public services.

Although this act has been instrumental in advancing equality, it is insufficient to provide comprehensive protection for transgender individuals because it lacks specific provisions regarding gender identity. Although it establishes the groundwork for addressing discrimination, the absence of legal protections for transgender individuals underscores a more general reluctance within Hungarian legislation to acknowledge and address the distinctive obstacles encountered by this community. As a result, the efficacy of legal instruments for anti-discrimination is often restricted by their inability to provide the customized protections necessary to address the unique needs of transgender individuals, thereby impeding their ability to promote genuine equality for all.

The legal framework in Hungary, while offering some protections for LGB individuals, continues to fail to adequately address the needs of transgender individuals. Following the 2020 amendment to Article 33, the absence of explicit legal recognition of gender identity in official documents has resulted in a situation in which transgender individuals are unable to manifest their gender identity by legal means. This legal divide has significant implications for the access of transgender individuals to healthcare, employment, and public services, in addition to its impact on personal and social recognition. Transgender individuals are compelled to navigate bureaucratic systems with inconsistent gender identifiers on official records, which can result in discrimination, harassment, and a general sense of exclusion, as they are unable to update their legal gender.

As well, the legal ambiguity surrounding gender identity in Hungary has resulted in a lack of government action to address critical issues, including the right to family recognition, healthcare access for transgender individuals, and protection against workplace discrimination based on gender identity. In numerous instances, societal attitudes continue to regard transgender individuals as “other” or “non-normative,” which exacerbates these challenges and complicates their ability to achieve social and economic integration. The necessity for more comprehensive, robust legal protections that guarantee equality for all genders, particularly transgender individuals who continue to encounter substantial obstacles in both public and private spheres, is emphasized by the legislative reticence on transgender-specific issues.

3.5 Overall Legal Transgender Rights in Bangladesh

Unlike Hungary, where the legal framework for transgender rights has made significant progress, Bangladesh's history and legal treatment of LGBTQ+ individuals have been significantly different. Section 377 of the British colonial penal code in Bangladesh historically criminalized same-sex relationships, defining them as "against the order of nature." This legal framework has been a contributing factor to the long-standing stigmatization of LGB individuals. Nevertheless, a significant breakthrough was achieved on November 11, 2013, when the Bangladeshi government officially recognized the third gender, thereby legally recognizing transgender individuals as a distinct gender category. In 2019, this legal recognition was a significant step in the process of granting transgender individuals specific rights, such as the right to vote. Transgender individuals were able to legally identify as a different sex and participate in civic activities as a result of this change, which marked a significant milestone for transgender visibility and rights in the country. In spite of these advancements, the societal perception of transgender individuals, particularly *Hijra* individuals, remains primarily negative, and there is a lack of comprehensive legal protections.

At the constitutional level, Bangladesh guarantees equality before the law under Article 27 and prohibits discrimination under Article 28 of the Constitution. Yet, as many legal scholars note, these guarantees have not been extended in practice to protect gender identity or expression. Courts have yet to clarify whether "sex" in Article 28 includes transgender persons, and no authoritative interpretation has been provided by the Supreme Court to date. This leaves transgender individuals in a vulnerable position where their rights are theoretically guaranteed but remain legally ambiguous and under-enforced. The recognition of hijras as a third gender in 2013 has symbolic value, but without constitutional interpretation or enabling legislation, its practical effect in employment, education, and healthcare sectors is limited.

The Bangladesh Labour Act 2006 (amended 2018) further illustrates this tension between symbolic recognition and enforceable protection. While the Act prohibits discrimination in broad terms and includes important provisions on workplace safety and maternity rights, it contains no explicit mention of gender identity, sexual orientation, or third gender categories. This omission allows employers to continue discriminatory hiring and workplace practices against hijra and transgender individuals without fear of legal sanction. By contrast, countries such as India and Nepal have already begun amending labor frameworks to reflect third gender protections, signaling a regional divergence in how South Asia interprets equality obligations. Bangladesh's continued reliance on a gender-binary framework in its labor law risks rendering its constitutional promises hollow.

From the perspective of international obligations, Bangladesh has ratified ILO Convention No. 111 on Discrimination (Employment and Occupation), which requires the elimination of discrimination on the basis of “race, color, sex, religion, political opinion, national extraction or social origin.” Although the text of the Convention does not expressly list gender identity, the Committee of Experts on the Application of Conventions and Recommendations (CEACR) has clarified that “sex” may be interpreted to include gender identity and expression. In its 2023 General Survey, the Committee emphasized that gender equality frameworks must account for “each person’s deeply felt internal and individual experience of gender, which may or may not correspond with the sex assigned at birth” (ILO, 2023, p. 54). Bangladesh has yet to incorporate this interpretation into domestic law, creating a divergence between its international commitments and its national legal framework. Without such incorporation, the promise of Convention No. 111 remains aspirational rather than enforceable for transgender workers in Bangladesh.

Despite the legal recognition of the third gender, Bangladesh still lacks explicit provisions for transgender individuals to legally alter their sex on official documents. There is no well-defined procedure by which transgender individuals can modify their gender identifiers in their national identity documents, such as passports or birth certificates. This lack of clarity presents substantial obstacles for transgender individuals who aspire to have their gender identity legally acknowledged. The situation is further complicated by the absence of detailed legal guidelines regarding who qualifies as a third gender, which leaves transgender individuals vulnerable to discrimination, both socially and legally. In Bangladesh, transgender individuals are now able to officially identify as a third gender. However, their right to do so is not backed by a clear legal framework that guarantees protection or provides practical avenues for altering gender indicators on official records.

Nevertheless, the Constitution of Bangladesh establishes a basis for legal rights that can be applied to transgender individuals. For example, the Constitution’s Part II, Article 19 guarantees equal opportunity for all citizens, while Part III, Article 27 guarantees equality before the law for all citizens, which theoretically should incorporate transgender individuals. Furthermore, the Constitution ensures the freedom of the press and religion, although these rights are subject to limitations based on “decency or morality.” The legal framework’s absence of specific provisions that address transgender issues creates a lacuna that leaves transgender individuals vulnerable to discrimination in critical areas such as employment, education, and healthcare, despite these constitutional protections. For example, transgender individuals are not explicitly safeguarded by employment discrimination laws, and they encounter numerous

obstacles in obtaining high-quality healthcare and education services, which are essential for their social integration and overall health. Furthermore, the absence of anti-discrimination laws that specifically target transgender individuals in the workplace and other areas places them at a substantial disadvantage in comparison to their cisgender counterparts, despite the fact that they are able to vote and access certain social welfare benefits.

Public attitudes toward transgender individuals, particularly those who identify as *Hijra*, remain primarily hostile and derogatory, in addition to these legal ambiguities. *Hijra* individuals are still perceived by a significant number of members of society as “homosexual guests” or as occupying a marginal, non-normative position in society. The discrimination that transgender individuals endure is perpetuated by this pervasive societal prejudice, despite the progress that has been made toward legal equality. It also emphasizes the necessity of broader social and cultural changes to accompany legal reforms. Even though the 2013 recognition of the third gender was a significant milestone, the absence of supportive legal provisions and the persistently negative societal attitudes present significant obstacles to the full integration of transgender individuals into society. Transgender individuals encounter systemic challenges in their daily lives that the legal framework fails to adequately address, despite the fact that it guarantees them certain fundamental rights.

Bangladesh has made some initial strides toward recognizing transgender rights, such as granting voting rights and recognizing the third gender. However, its legal framework still lacks comprehensive safeguards that protect transgender individuals from discrimination in healthcare, education, and employment. Although constitutional protections against discrimination exist, the absence of specific anti-discrimination laws and explicit procedures for legal gender recognition leaves transgender individuals susceptible to societal and institutional inequities. The imperative for more robust legal reforms and societal change to guarantee that transgender individuals can reside and work in a society that fully acknowledges their rights and dignity is underscored by the persistent social stigma and the gaps in the legal system.

4 Literature review and conceptual framework

4.1 Transgender status: Hungary vs. Bangladesh

4.1.1 *Hungarian Chapter*

Transgender status in Hungary remains critical since, unlike in some Asian countries such as Bangladesh, which recognized transgender individuals legally as the third gender and socially recognized them as *Hijra* (see the following section of this chapter), whereas like in other European countries, the subject matter of transgender individuals deals with the umbrella term LGBTQ+. According to the literature, a growing homophobic or transphobic culture has been found over several decades. For example, a previous report Menzel et al. (2019) highlighted that 90% of LGBTQ+ respondents involved in Hungarian sports respond that in the Hungarian sports community, prejudice is a serious challenge, and a startlingly high proportion of athletes avoid participating in organized sports.

Similarly, 86% of the respondents supported homonegativity as an important discriminatory scenario in the Hungarian sports arena. For transgender people, the scenario is worse than for other LGBQ people. In line with this perception, Szlávi (2022) have seen that in the Hungarian sports area, due to their transphobic environment, transgender people were not feeling comfortable revealing their identity. Szlávi (2022) cited Atlasz, the largest LGBTQ+ social club in Hungary, as an example. Szlávi (2022) stated,

...Atlasz has been struggling with an internal imbalance since its foundation in 2004: gay men significantly outnumber lesbians and bisexual women, not to mention transgender people. Multiple attempts have been made to increase the diversity of the organization, which has recently proven to be successful, at least given the increasing involvement of women. There is still a significant imbalance in the sexual orientation and gender identity of athletes. (p. 100)

Although Szlávi (2022) emphasized the sports arena, this does not mean that in other areas, LGBTQ+ people used to have more opportunity. In recent years, the situation has worsened, and increasing genderism (see the theoretical framework) has also depicted the national legislative movement. For instance, the Hungarian government proposed a new modification to Article 33 regarding legal gender recognition in the public database and on the proof of identity by 31 March 2020 through an omnibus bill, replacing “sex” with “sex assigned at birth” (Hatter Society, 2020; ILGA-Europe, 2021a). The justification offered for this alteration was,

The sex entered into the civil registry is based on facts determined by doctors and declared by the registry. The registry certifies the facts and rights it includes until proven otherwise; therefore, it does not create rights. However, the sex declared by the registry could create rights or obligations; therefore, it is necessary to define the term “born sex”. Given that completely changing one’s biological sex is impossible, it is necessary to establish that it cannot be changed in the civil registry either (ILGA-Europe, 2021a).

Like Article 33, which headed back to the past ten years, several cases can be considered the worst legal support for Hungarian transgender people. For example, a transgender man who had been accepted as a refugee in Hungary in 2016 asked for the legal recognition of his sexual identity. The authorities turned down his plea on the grounds that he does not possess a Hungarian identity (Hatter Society, 2020). Similarly, 23 transgender people petitioned the Strasbourg court in 2017 and 2019 after the Hungarian government ignored their request for legal gender recognition (Hatter Society, 2020). A petition for legal gender recognition made by a transgender man in August 2019 was denied by the local registrar in June 2020 following Article 33 (Hatter Society, 2020). To discuss a similar case, Hatter Society (2020) presented another example in the following manner:

In March 2019, a transgender man applied for legal gender recognition, which was rejected by the local registrar in June 2020 with reference to Article 33. The applicant argues that legal gender recognition should be granted notwithstanding the entry into force of Article 33 or, alternatively, that the Debrecen Regional Court should suspend the case and request that the Constitutional Court review the constitutionality of Article 33. The Debrecen Regional Court annulled the order of the registrars and ordered us to conduct a new procedure. In the repeated procedure, the Government Office of the Capital City of Budapest rejected the application for gender and name changes; therefore, the decision was challenged at the Budapest-Capital Regional Court.

The court-initiated proceedings with the request that the Constitutional Court declare a prohibition on the use of Section 101/A (2) of Act I of 2010 on Civil Procedure for the current case and any ongoing proceedings concerning the same subject matter that are currently pending before a court. The Constitutional Court’s decision (11/2021. (IV. 7.) AB) declared this section unconstitutional and invalidated it, which was in effect from 29 May 2020 to 7 April 2021. The Constitutional Court effectively denied the judicial initiative to exclude the application of Article 101/A (2) of Act I of 2010 on Civil Procedure in its ruling. The provision in issue was rendered inapplicable in any related proceedings as the Court mandated that its decision (11/2021 (IV. 7.) AB) be applied universally to all cases. This was a significant

moment in the legal framework, as the decision clarified the constitutional validity of specific procedural rules and their application across pending cases (Barát, 2022; Primecz & Pelyhe, 2023).

The regional court annulled the previous decision made by the Government Office in response to the Constitutional Court's ruling. This annulment mandated that the appropriate authorities re-enact the procedural steps to guarantee that all actions were consistent with the revised constitutional interpretation (Primecz & Pelyhe, 2023). Nevertheless, the authorities suspended the process during the repeated procedure, citing the ongoing legal proceedings within the Curia, the highest judicial body in Hungary (Kövér et al., 2021). This delay was a necessary precaution to guarantee that all actions would be in full compliance with the most recent judicial findings, as the Curia had not yet completed its review of related legal questions. Upon the conclusion of these proceedings, the authorities notified the applicant, directing them to address any procedural deficiencies that were identified during the process (Primecz & Pelyhe, 2023).

The applicant was obligated to verify their consent to undergo an examination by a committee of forensic experts after they had taken the requisite measures to address the deficiencies. This step was essential for guaranteeing that the procedural process proceeded in a manner that honored the applicant's rights and the legal requirements. It was anticipated that the forensic specialists' examination would offer critical insights into the applicant's case, thereby facilitating a more informed and equitable outcome in the legal proceedings (Sony, 2024). This sequence of events underscores the intricacies of legal processes, which necessitate meticulous adherence to judicial principles and the intersection of procedural equity and constitutional judgments at each stage of the legal process (Primecz & Pelyhe, 2023; Roots, 2022).

As a result, Hungary has encountered a number of legal challenges and cases in recent years stemming from Article 33, which has become a focal point in ongoing debates about transgender and sexual minority rights in the country (Primecz & Pelyhe, 2023; Roots, 2022). This article, which relates to the legal recognition of gender, has sparked considerable legal scrutiny and controversy, particularly after 2020 when amendments to the law restricted transgender individuals' ability to change their gender on official documents. These legal disputes highlight the ongoing tensions between constitutional protections for individual rights and the broader political and social landscape in Hungary, where sexual minorities continue to face challenges in securing full legal recognition and protections. The legal landscape surrounding LGBTQ+ rights in Hungary has evolved significantly over the years, though many

of these developments have been incremental and, in some cases, marked by setbacks for transgender and sexual minority rights (Barát, 2022).

Turning to history, however, Hungary has made notable progress in protecting the rights of sexual minorities, particularly after 1961 when same-sex sexual activity was decriminalized. Following this decriminalization, sexual minorities in Hungary experienced a gradual shift in legal protections (Sándor, 2016; Vida, 2019). Over the years, Hungary's legal framework evolved to better address the rights of LGBTQ+ individuals, although these rights were still often limited or conditional. By 2009, same-sex couples were granted access to a range of legal advantages typically reserved for married couples, such as inheritance rights, joint property rights, and health care decision-making rights (Kováts, 2020). This represented a significant legal milestone, granting same-sex couples many of the same protections afforded to heterosexual couples. At the same time, Hungary implemented protections against discrimination based on sexual orientation, with specific legal provisions designed to protect LGBTQ+ individuals from hate crimes and other forms of discrimination in public and private life.

Despite these advancements, challenges remain, especially regarding the full legal recognition of gender identity and the extension of legal protections to transgender individuals. While same-sex couples have gained important legal rights, transgender individuals have encountered significant legal hurdles, particularly in terms of obtaining legal recognition for their gender identity. The legal changes in 2020, which effectively removed the ability of transgender individuals to alter their gender on official records, marked a sharp reversal in the progress made over previous decades. This highlights the tension between legal advancements in certain areas and the setbacks transgender people face, which underscores the need for continued advocacy and legal reform to ensure full equality and protection for all sexual and gender minorities in Hungary (Hatter Society, 2011; Szlávi, 2022).

Nonetheless, in recent decades, several legal movements, such as those mentioned above 33, have allowed heterosexual couples to adopt only children, which has posed a challenge for surviving nonbinary people (Gregor & Verebes, 2023; Kaszás, 2020; Primecz & Pelyhe, 2023). Consequently, Hungary ranks 27th out of 49 European nations in terms of the legal status of nonbinary individuals according to the latest rainbow mapping from ILGA-Europe (2021b), and compared to the previous year, Hungary lost 8.46% of points, the largest decline in Europe. Socially and politically, these people are sometimes considered “secondary citizens”. This perception has direct impacts on LGBTQ+ people living in urban areas and

those living in rural areas, as shown in previous studies Béres-Deák (2022). According to Béres-Deák (2022),

... the city–country dichotomy is strongly simplified and does not do justice to the variety of experiences, depending partly on settlement size and local characteristics. Additionally, rural LGBTQ+ people, far from living oppressed, closed lives as stereotypes sometimes suggest, carve out their own spaces and develop their own strategies to adapt to local circumstances and counter potential prejudices in their environment ... (p. 555).

Another study that supports this point of view showed that 75% of people claim they are unaware of any LGBTQ+ people living nearby, which is essential even though, according to the findings, getting to know an LGBTQ+ person personally significantly raises one's level of tolerance and appreciation of LGBTQ+ rights (Budapest Pride & Integrity Lab, 2016; Roots, 2022; Szlávi, 2022). Along with education, Szlávi (2022) believes that there is a close association between LGBTQ+ and gender studies. However, in Hungarian academia, gender-related studies have become unusual due to the political ideology of genderism. Several academic disciplines and scholarly works have been shut down. The first was the Center for Social Studies at the Hungarian Academy of Sciences, followed by Hungary's first gender studies major program at a state university within a year of its launch and, finally, the Center for Social Studies at Central European University, which offers majors on gender and sexuality as well as other minority issues (Oppenheim, 2018).

Subsequently, for gender relations and gender gaps, Hungary remains one of the worst situations among the other European countries. For instance, according to the Global Gender Gap Report (World Economic Forum, 2020), Hungary is one of the 10 nations with the worst political representation for women and one of the 50 nations with the widest gender gaps worldwide. The only other European nation scoring this poorly in these two categories is this one (Szlávi, 2022). The condition of nonbinary people in Hungary clearly presents serious difficulties.

While these social dynamics are revealing, they must be read against the backdrop of Hungary's obligations under European Union law and international human rights instruments. The Equal Treatment Act (Act CXXV of 2003) and the Hungarian Labor Code formally prohibit discrimination in employment, but the absence of an explicit reference to gender identity creates a serious lacuna in protection. As Zaccaria (2022) notes, the Hungarian framework of labor law is closely tied to the European model, particularly through the European Pillar of Social Rights and the incorporation of directives such as Directive (EU)

2019/1152 on Transparent and Predictable Working Conditions (Zaccaria, 2022). However, while EU law—especially through the jurisprudence of the CJEU beginning with *P. v. S.* and *Cornwall County Council* (C-13/94)—has established that discrimination against transgender persons falls within the prohibition of sex discrimination, Hungarian law has moved in the opposite direction. The amendment to Article 33 of the Fundamental Law effectively contravenes this interpretation, raising concerns about compatibility with both EU obligations under the Employment Equality Directive (2000/78/EC) and the broader guarantees of the EU Charter of Fundamental Rights (Articles 21 and 23).

From a comparative perspective, this regression places Hungary at odds not only with the EU but also with the broader European human rights framework, including the European Convention on Human Rights (ECHR). The European Court of Human Rights has long recognized that legal gender recognition is essential to the right to private life under Article 8 (e.g., *Goodwin v. United Kingdom*, 2002). By refusing to provide a legal pathway for gender recognition, Hungary risks violating its obligations under the ECHR, as well as undermining the principle of effective protection enshrined in EU law. As Zaccaria (2015) has argued, equal employment rights cannot be divorced from broader human rights protections, since the courts must interpret labor law in light of overlapping constitutional and supranational guarantees (Equal Employment in Practice – Which Way Forward?). In this respect, Hungary exemplifies a “dual deficit” model: despite having a relatively developed anti-discrimination framework on paper, restrictive constitutional amendments and the absence of gender identity recognition erode the enforceability of those rights in practice. This dual deficit explains Hungary’s sharp decline in ILGA-Europe’s Rainbow Index and highlights the urgent need for alignment between domestic law, EU directives, and binding human rights jurisprudence.

4.1.2 *Bangladeshi chapter*

Understanding transprejudice is a postmodern notion emphasized by Campbell et al. (2019a) to explain the interaction between society and sexual/gender minority groups such as transgender people, who are now recognized as the third gender by law in subcontinent areas. Locally referred to as *Hijra* and/or eunuch, transgender people are frequently seen as “sexless” in South Asia (Amanullah et al., 2022; Dutta, 2023; Islam, 2016; Sinha, 2016). However, according to the UNDP, the name “*Hijra*” refers to everyone else who is unlikely to have a binary gender identity (Sinha, 2016). The term “third gender” has been used to resolve public debates over identity crises in Bangladesh, a South Asian nation, and other locations (Islam, 2016). For instance, the Bangladeshi Prime Minister accepted *Hijra* as the third gender in the

national legislature on November 11, 2013, although the First Cycle of the Universal Periodic Review (UPR) of the Government of Bangladesh stated that LGBT issues were “out of context” in 2009. The government response was as follows:

.. on LGBTs, we concur with the NRHC that the laws of the land.. However, we recognize the need for protecting all vulnerable groups of our population, given their constitutional equal rights and freedoms. Moreover, we did not condone any discrimination or violence against any human being on any pretext. (April 2013)

The *Hijra* community of Bangladesh has been acknowledged by the government of Bangladesh as a *Hijra* sexer. This announcement was made in the gazette on January 26, 2014, and it came after several years. This memo was an important milestone in the process of gaining a variety of human rights for Bangladesh’s *Hijras*—those who, despite being given the term “male” at birth, later identified as feminine and chose to be labeled *Hijras* or a third gender. The Honorable Law Minister pledged to present this draft law to the legislature by 2015. Although there has been a rise in public awareness and legal action, attitudes about transgender persons remain unfavorable.

As a young nation, Bangladesh’s transgender integration issue is more likely to be cultural than legal or political. Research has demonstrated that these kinds of people are typically viewed by the majority of society as individuals who “violate values” (Campbell et al., 2019a). According to some studies, these minorities are also thought of as being cursed (Campbell et al., 2019a; Hossain, 2012; Reddy, 2005). These organizations are also referred to in society as homosexual organizations and are forbidden in the majority of Abrahamic religions (i.e., Jewish, Christian, and Muslim) (Campbell et al., 2019a; Hossain, 2012).

Similarly, some people also believe that “the male soul is in the female body” (Reddy, 2005; Reddy, 2021). Such bias typically leads to binary sexual groupings (i.e., men and women) to prevent this specific gender group from participating in rituals, work, education, and other social activities (Arvind et al., 2022). On such occasions, certain kinds of people are seen as unlucky and are not permitted on various family occasions (Hossain & Ferdous, 2020). Hossain and Ferdous (2020) provided the following viewpoint to further examine this phenomenon:

I do not stay with my family. My parents love me, but they cannot keep me at home. I usually go home to meet my parents at night and come back very early in the morning. Community people consider seeing or associating with me as a source of bad luck for them. I could not join in my sister’s wedding, although I paid for most of it. My siblings and other family members informed me that my presence at the wedding party might create dissatisfaction

among the bridal guests and that there was a very real possibility that the wedding could not continue if I were there. (p. 96)

Due to these social beliefs, these sexual minorities have formed a distinct subculture and acquired some unique characteristics within their society. For instance, in Bangladesh, anyone can spot some guys on the streets and in the markets who have a manly attitude, wear brightly colored clothing, mostly *Sharee* (traditional draping), and occasionally *Salwar Kameez* (a pair of light, loose, pleated trousers, usually tapering to a tight fit around the ankles, worn by women from South Asia). These patients also have unusual make-up styles, usually red lipstick, and frequently clap while speaking, usually in response (Arvind et al., 2022). Along with living in different locations, they also create a society with a single leader known as *Guruma* (mother or leader), with little access to ordinary people.

This sexual minority has been directed to stay from participating in mainstream employment sectors by identifying characteristics that have been developed or repeated through social interactions over an extended period of time. However, to make a livelihood, this group of people has engaged in various illegal acts, such as prostitution, mugging, smuggling, and begging (Arvind et al., 2022; Kalra, 2012; Sinha, 2016). An increasing body of research demonstrates that participation in such disrespectful acts is a sign that these populations also experience social exclusion and lack of authority within society (Arvind et al., 2022; Hossain & Ferdous, 2020). Hossain and Ferdous (2020) emphasized a citation from the neighborhood to describe these scenarios:

Since we are involved in sex work, people think that we are bad and that we are destroying the reputation of society. Nobody gives us work; everywhere, we are abused and neglected. Unfortunately, people do not want to understand why we are involved in sex work. We are forced to engage in these activities for our livelihood. However, people think that we are sexually deviant, which is heartbreaking for us (Hossain & Ferdous, 2020; p. 97).

Other issues that plagued the third gender were multifaceted dangers such as health concerns such as HIV/AIDS, economic fragility, and helplessness (Hossain & Ferdous, 2020). In light of this background, the purpose of this study was to provide fresh insight into the connection between transgender people and occupational exclusion in a sociopolitical context. To do this, the author critically investigates whether the legal system has been utilized to marginalize the third gender in society based on secondary literature, the majority of which is peer-reviewed published material. The authors also discuss the *Hijra* people's current employment situation to support their claim.

By studying the historical evidence, it has been found that these particular groups enjoy a high standing in pre-British society and actively participate in the employment sector. Agoramoorthy and Hsu (2015) revealed, for instance, that a number of gods, including Lord Krishna (an incarnation of Vishnu and the charioteer of the warrior King Arjuna in the Mahabharata epic), Lord Arjuna, and Lord Shiva, have had avatars (manifestations) in various circumstances. Therefore, transgender persons have unique respect in society on the historic Indian subcontinent. As a substantiation, a particular sacred artifact that looks like a half man and a half woman has been revered in numerous temples throughout India (Agoramoorthy & Hsu, 2015). According to this viewpoint, some academics contend that transgender people are regarded as acceptable and sexually pure in pre-British India (Kalra, 2012). As a result, they were asked to bless a new-born child. Most likely, this historical setting is where the *Hijra* culture of today started.

It was observed that transgender people gained more status later during the Mughal era (1504–1719), which was also known as the Muslim era in pre-British India, because some official positions, such as royal guards in the courtyards (Faruqui, 2012) and maintenance of the royal Harem (women’s quarters), were reserved for them (Agoramoorthy & Hsu, 2015). Despite the fact that Section 377 of the Indian Penal Code was introduced in 1860, transgender people were nonetheless viewed as criminal members of society during the British era (1757–1947) (Agoramoorthy & Hsu, 2015; Agoramoorthy & Minna, 2007; Sinha, 2016).

This developed because transgender people were viewed as homosexuals in Christian society, in contrast to Muslim and Hindu society, and because Section 377 treated homosexuality as a criminal (Agoramoorthy & Hsu, 2015; Campbell et al., 2019a). Several academics (e.g., Agoramoorthy and Hsu (2015); Kalra (2012); Sinha (2016)) contend that this marked the start of transgender people being marginalized in the subcontinent regions, which has persisted to the present day.

Despite the fact that Bangladesh’s *Hijra* community has surmounted some of its identity challenges since the formal legal recognition of the third gender in 2013, the fight for complete societal integration and social protection continues (Al-Mamun et al., 2022; Arvind et al., 2022). The recognition of *Hijra* as a distinct gender category was a significant accomplishment; however, there is still much to be done to guarantee that this community is thoroughly integrated into the social, economic, and political life of the nation. Although the legal recognition of the third gender has allowed *Hijra* individuals to exercise certain civic rights, including voting and identification, the lack of practical measures and targeted policies for social integration has resulted in a significant number of individuals remaining

marginalized (Al-Mamun et al., 2022; Amanullah et al., 2022; Arvind et al., 2022; Dutta, 2023). Social exclusion, discrimination, and a lack of access to essential services such as education, healthcare, and employment continue to be significant challenges for many *Hijra* individuals (Akter & Saha, 2024). This has resulted in a situation in which, despite legal recognition, the social integration of *Hijra* individuals is still inadequate, and they are still marginalized in numerous facets of public life.

There is a critical area in which integration is still limited: social protection. Social protection, which encompasses both social insurance and social assistance, is essential for the support of vulnerable populations (Akter & Saha, 2024; Al-Mamun et al., 2022). However, *Hijra* individuals are still widely excluded from the majority of these protections. Work status, which is a critical element of social protection, continues to pose a substantial obstacle for transgender individuals in Bangladesh (Aksoy et al., 2024). Due to widespread discrimination and societal stigma, numerous *Hijra* individuals are unable to secure formal employment. Their vulnerability is further exacerbated by the absence of stable income and employment security, which restricts their capacity to enhance their socio-economic circumstances. Consequently, a significant number of *Hijra* individuals continue to depend on informal and frequently precarious employment (Aksoy et al., 2024), such as soliciting or performing at weddings, which not only provide them with minimal financial stability but also exacerbate their marginalization.

Work status is a critical factor in determining an individual's overall quality of life and access to resources, in contrast to social insurance and social assistance, which are fundamental components of a country's social protection framework. *Hijra* individuals are unable to receive the same social protections as other citizens due to their lack of recognition and access to formal employment (Aksoy et al., 2024; Shah et al., 2024), which perpetuates cycles of poverty and social exclusion. Consequently, this section explores the present state of transgender labor status in Bangladesh, including the obstacles encountered by *Hijra* individuals in obtaining formal employment, the impediments to workplace inclusion, and the broader implications of these obstacles for their social protection (Reddy, 2021; Shah et al., 2024). The objective is to gain a more comprehensive understanding of the systemic issues that impede the economic and social integration of transgender individuals in Bangladesh and to identify the areas in which legal and policy reforms are urgently required to promote equality and inclusion in the labor market.

To date, most of the related literature has emphasized how transgender people face discrimination in Bangladeshi employment sectors. Bangladesh's third gender primarily

involved dancers at wedding receptions, baby shower celebrants, prostitutes, or extortionists in neighborhood markets (Barik and Sharma (2020); Khan et al. (2009a); Mamun et al. (2016)). The majority (67%) of transgender people, according to research, earn between 5000 and 12000 Bangladeshi Taka (BDT) per month (Islam, 2019). Eighty-nine percent of *Hijra* persons have experienced difficulties entering the mainstream labor field because of their particular gender status (Islam, 2019). In addition, 77% of *Hijra* claimed to M. Islam (2019) that they lacked the freedom to attend educational institutions; hence, they lacked the credentials to acquire a prestigious career in society.

In light of this situation, it is critical to comprehend why these individuals choose to engage in actions that neither elevate them to a higher social status nor provide them with the income necessary to support their lifestyle. Mamun et al. (2016) provided the following response to this query: "...transgender individuals are frequently fired once it is disclosed that they are transgender" (p. 173). This result reveals the workplace's transphobic culture. According to Khan et al. (2009a), a transgender person said the following, which supports these perceptions:

I have worked in a garment factory for about a year. I could not even go to the toilet, as I was scared that the boys would go there to see me. They always tried to have sex with me. When there was a night shift, the threat was greater. Once my supervisor forced me to have sex with him, and I had no choice but to do it. However, when it became public, I was dismissed from my job, as if it was my fault. (p. 445)

Hossain and Ferdous (2020) provides another illustration:

Nearly two years ago, I started working as a security guard in a house. When the houseowner appointed me, he did not know that I was transgender. After a few days, they identified me as *Hijra* by observing how I move. Then, the house owner fired me, saying that he could not keep any transgender individuals in his house. (p.100)

In addition to this gender stereotype, Hossain and Ferdous (2020) discovered that "mistrust" was a significant factor in why mainstream individuals choose not to employ *Hijra* in popular work sectors. However, this evidence is insufficient for comprehending the overall discriminatory scenario of transgender individuals since the previous literature (e.g., Mamun et al. (2016); Khan et al. (2009a); Hossain and Ferdous (2020)) has emphasized an overall discriminatory scenario through a comparative study. There are now obvious gaps in the literature regarding this topic, which could be filled by continued study.

Although Bangladesh made a symbolic breakthrough in 2013 by legally recognizing hijras as a third gender, the absence of explicit labor protections for transgender individuals demonstrates a gap between recognition and enforceable rights. The Bangladesh Labour Act 2006 (as amended in 2018) prohibits discrimination in broad terms, but it does not list gender identity or expression as protected categories. As a result, transgender workers often find themselves excluded from both formal employment opportunities and remedies against workplace discrimination. This lacuna contradicts Bangladesh's obligations under ILO Convention No. 111, which it ratified in 1972, requiring states to eliminate discrimination in employment and occupation. The ILO Committee of Experts has emphasized that "each person's deeply felt internal and individual experience of gender, which may or may not correspond with the sex assigned at birth" should be considered within the scope of non-discrimination (ILO, General Survey 2023, p. 54). Yet, Bangladesh has not translated this interpretative guidance into domestic law, leaving transgender workers vulnerable to systemic exclusion.

From a comparative perspective, Bangladesh presents a "symbolic recognition without enforcement" model, which contrasts sharply with Hungary's "rollback within a developed legal system." While Hungary faces criticism for directly contravening EU and ECHR standards through restrictive constitutional amendments, Bangladesh's challenge lies in its failure to operationalize international commitments in domestic law. The Constitution of Bangladesh, particularly Articles 27 and 28, enshrines equality before the law and prohibits discrimination on the ground of sex, but courts have not extended these protections to cover gender identity. Without proactive legislative reform or judicial interpretation, the third-gender recognition risks remaining a hollow category. As in Hungary, the result is a duality where rights exist in principle but are undermined in practice—whether through constitutional restriction (Hungary) or legislative omission (Bangladesh). Both jurisdictions illustrate different pathways to the same outcome: transgender individuals continue to face legal invisibility in the labor market despite the existence of formal equality guarantees.

4.2 Conceptual Framework: Different types of discrimination faced by transgender individuals in the employment sector.

In this section, the researcher has addressed a number of significant conceptual frameworks that are directly relevant to the study's objective of elucidating the obstacles that transgender individuals encounter when engaging in the workforce. These frameworks are indispensable instruments for comprehending the various forms of discrimination that transgender

individuals may encounter in the workplace, thereby contextualizing and elucidating the multifaceted nature of exclusion in the labor market. It is essential to recognize that discrimination against transgender individuals can take on a variety of forms, and it is important to recognize that these individuals may be subjected to discrimination not only based on their gender identity but also on other intersecting aspects of their identity, such as ethnicity, sex, religion, or socio-economic background. The pervasive nature of inequality is underscored by the fact that discrimination can occur at any time and in any context, whether in formal or informal settings.

The transgender community, a subgroup of the broader LGBTQ+ spectrum, has long been the target of legal, social, and economic discrimination based on their gender identity and sexual orientation. Throughout history, transgender individuals have been denied or severely restricted from participating in conventional social, political, and economic spheres. This includes their rights to education, employment, and healthcare. This societal marginalization has resulted in substantial obstacles for transgender individuals who are seeking employment. As a result, a significant number of them have been compelled to resort to informal sectors or occupations that do not provide legal protections or financial security. Access to equal employment opportunities remains a significant challenge for many transgender individuals, despite the progress that has been made in certain regions.

Regarding the subject matter of this study, the comprehension of transgender discrimination in the labor market is particularly pertinent to the investigation of two dominant theoretical paradigms. The initial model, the contextual model, emphasizes the fact that discrimination against transgender individuals can differ based on the specific context in which it occurred. The significance of comprehending the social, cultural, and legal environment in which transgender individuals are situated and the ways in which these external factors affect their experiences of discrimination in the workplace is underscored by this model. Discrimination, as per this model, can be influenced by regional, cultural, or institutional contexts. Transgender individuals may experience varying degrees of inclusion or exclusion based on the specific societal norms, values, and legal protections that are available.

The classical model of discrimination, the second framework, offers a more economic-based explanation of the manner in which discrimination in the labor force manifests for transgender individuals. In accordance with this paradigm, economic factors are the primary determinant of who is discriminated against and the reasons for it. This model posits that the socio-economic status of transgender individuals, which encompasses factors such as education, employment history, and access to resources, can have a substantial impact on their

likelihood of encountering discrimination in the workplace. For instance, in labor markets that prioritize qualifications or economic success, transgender individuals with lower levels of education or those from marginalized economic backgrounds may experience increased discrimination. This model elucidates the systematic exclusion of transgender individuals from high-paying positions or formal sectors of employment, where discrimination is frequently subtler but still prevalent.

The subsequent section (Figure 5) will provide a more comprehensive overview of the main components and categories of both models. The researcher will offer a thorough comprehension of the unique challenges encountered by transgender individuals in the workforce as a result of this discussion, including the ways in which each model contributes to this explanation. The models will also assist in the organization of the data acquired for this study, thereby elucidating the diverse aspects of transgender discrimination in the labor market. In addition to the legal and social aspects, the analysis will also explore the economic factors that exacerbate the employment situation for transgender individuals. In the end, both models will offer valuable insights into the structural barriers that impede the complete participation of transgender individuals in the workforce, thereby establishing a more defined course for future research and policy recommendations.

4.2.1 *Contextual Discrimination*

Both formal and informal discrimination against transgender people occur in the workplace (Figure 5). These two types of discrimination are known as contextual discrimination. “Formal discrimination” refers to prejudice that occurs in institutionalized workplace settings, such as the hiring process and the workplace itself, such as discrimination in promotions, performance appraisal, investing in the employee’s development and training and supervising and terminating them. To explain such a discriminatory scenario McFadden (2020),

There is some Catch-22 for transgender people seeking work; if they have not transitioned before the beginning of their career, they can provide their relevant qualifications, references, and experience under their desired name, and risking hirers following up on this experience finding out their transgender identity anyway; they can provide their former name, in which case the hirer becomes immediately aware that the candidate is transgender and can discriminate; or they can, ... “start over,” if they don’t want to out themselves as transgender but must suffer career-related consequences in doing so, because their experience cannot be shared directly. (p. 4)

It is evident from the foregoing discussion that transgender people typically struggle in their early careers to obtain employment due to their status. Numerous studies have demonstrated that respondents believe that they were just passed over for a job because they identify as transgender; nevertheless, it is unclear how much discrimination they have experienced. For instance, James et al. (2016) and McNeil et al. (2013) found that transgender candidates experience discrimination when they are applying for jobs and are being interviewed.

Similarly, Grant, Mottet, et al. (2011) found that 44% of transgender respondents in a nationwide U.S. study felt that their lack of employment was a result of their gender identity. In the same report Grant, Mottet, et al. (2011), 23% of transgender people faced discrimination via promotions, which is another form of formal discrimination. Even after the identity exposé, 26% of transgender individuals have lost their job in the U.S. (Grant, Mottet, et al., 2011). Wage discrimination is an additional form of formal discrimination experienced by trans-males and trans-females. As a result of such discrimination, one group of transgender individuals becomes marginalized within a society.

Whereas stereotyping and verbal or physical abuse by clients or coworkers can occur in nonformalized situations and be considered informal discrimination, they can include all forms of discrimination that occur in informal as well as casual settings; in some contexts, they can also occur in formal settings. According to Grant, Mottet, et al. (2011), 90% of transgender respondents have experienced informal discrimination several times in their life in the U.S. labor market. Scholars further examine the various forms of informal discrimination that transgender workers frequently encounter at work.

McFadden (2020) classified this kind of discrimination into two types: stereotyping and harassment. Stereotyping refers to a variety of widespread myths regarding transgender individuals, including the ideas that they are sexual predators or sex workers, that they wear outlandish make-up to “pass” as cisgender people, that they have more mental health problems than do cisgender people, and that they have mental health difficulties (Lester, 2015; McFadden, 2020). In a study Van Borm and Baert (2018), it was found that some employers believe that, compared to cisgender women, transgender women are considered more physically weak and unlikely to hire them.

In line with this view Collins et al. (2015), gender stereotypes and expectations that are ingrained in society might provide ambiguity over how to approach transgender individuals in the workplace, which can marginalize and exclude them. In support of this view, Beauregard et al. (2018) believe that transgender workers may have more issues and stress when the

workplace itself is highly gendered, such as when it includes gender-specific restrooms and uniforms.

Like in stereotyping, harassment typically occurs through workplace maltreatment through informal discrimination based on gender identity. Approximately 78% of the respondents in the Grant, Mottet, et al. (2011) have reported harassment due to having a transgender identity. According to Rudin et al. (2014), transphobic insults, intrusive questions about genitalia or one's sex life, outing one as transgender to others, and being prevented from using the restroom that corresponds to one's gender are all examples of harassment that specifically affects the transgender community. In response to harassment, both orally like bullying and physically, individuals who identify as transgender may face pressure to leave their jobs, change careers, or both, which causes them to feel stressed (Mattheis et al., 2022; McKendy et al., 2021).

Understanding harassment as a form of nonformal discrimination, McFadden (2020) further introduced another concept, "microaggression". Sue (2010) defines microaggression as "brief, everyday exchanges that send denigrating messages to certain individuals because of their group membership" (p. xvi). According to McFadden (2020),

Microaggressions directed at transgender people differ from those experienced by other minority group members because they misunderstand or intentionally ignore transgender issues and stereotypically assume a transgender community and gender identity in general.
(p. 8)

Unlike verbal harassment, such soft harassment also creates a bitter situation for any transgender individual in their workplace. An example of such microaggression could be in the workplace if any transgender individual is asked to dress according to their gender identity, which they have been "taught", while others are asked to dress according to their "legal" identity (Dispenza et al., 2012). Another form of microaggression toward a transgender individual at work could be asking with a "deadname"—the name the person used before their transition—and purposefully misgendering a transperson by referring to transwomen as "he" (Morris et al., 2020).

For transgender individuals, it is very difficult to express such informal discrimination toward an HR manager. McFadden (2020) suggested that a lack of proper education is the key driving factor for microaggression as well as all other types of discrimination against transgender people in the working environment; additionally, they recommended three specific

interventions: “education and awareness”, “transgender-specific policies”, and “staff focus, not individual focus” (suggesting reading, McFadden (2020)).

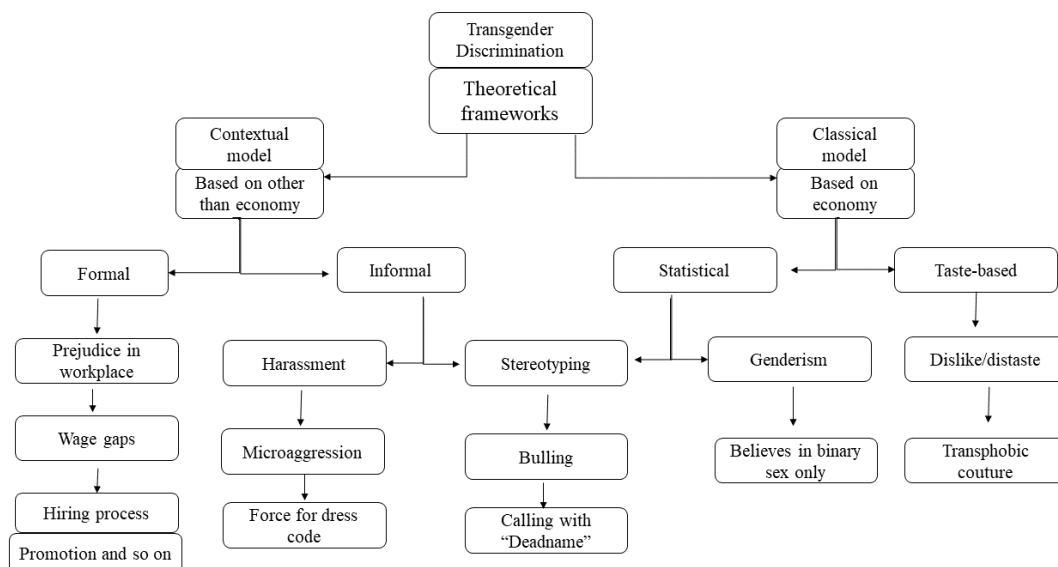
4.2.2 *Classical form of discrimination*

Apart from contextual discrimination, in practice, there are two dominant classical models of discrimination, taste-based discrimination and statistical discrimination (Figure 5), which are also found in labor issues for nonbinary sexual people. Taste-base discrimination was first coined by economists Becker (1957). According to Becker (1957), discrimination that results from bias or distaste on the part of the decision maker, such as a hirer or employer, is referred to as “taste-based discrimination.” Since then, to explain the economic dimension of transgender employment discrimination McFadden (2020), scholars have browsed this idea. To elaborate, McFadden (2020) stated that,

...the decision-maker may or may not know that discriminating against a particular candidate or employee may leave themselves financially worse off, but, in any case, they would not care; it is bigotry that supplies the primary motive. The result is that transgender people may have to work for less money or be much more productive than cisgender colleagues are to, in the employer/hirer’s eyes, “make up for” the penalty that their being transgender imposes. (pp. 3-4)

Therefore, taste-based discrimination is an unconscious and/or conscious action of organizational policy makers that minimizes the scope of work and access to resources for a transgender individual due to having a particular gender identity. In other words, if hirers dislike transgender people and do not want to hire them, then such discrimination could occur. McFadden (2020) suggested that transphobic culture, which is the subject matter of sociology and psychology rather than economics, is the driving wheel of this taste-based discrimination. According to D. B. Hill and B. L. Willoughby (2005), transphobia is,

...an emotional disgust toward individuals who do not conform to society’s gender expectations. Like in homophobia, fear or aversion to homosexuals or transphobia involves the feeling of revulsion toward masculine women, feminine men, cross-dressers, transgender individuals, and/or transsexuals. (p. 533)



(Source: Author produces, 2023)

Figure 5 Summary of the theoretical framework.

Unlike taste-based discrimination, statistical discrimination, acknowledged by Arrow (1971) and Phelps (1972), is more widely practiced in the labor market. Consequently, statistical discrimination occurs when one individual uses someone else’s reasonable expectation as a stand-in for another’s unobserved heterogeneity traits that are significant to the judgment being made (Arrow, 1971; Phelps, 1972). In practice, statistical discrimination might take place, for instance, if an employer decides not to hire a transgender person because they believe that transgender persons are typically less competent or productive in the position.

The driving wheel of this kind of discrimination is knowledge gaps and imperfect information, which are produced and reproduced from a number of gender stereotypes associated with health, productivity, and morality, as well as prejudice. To shed insight, Van Borm and Baert (2018) concluded that there is a chance that transgender job candidates will face statistical discrimination because the majority of their student representatives thought the transgender applicant was less qualified than the cisgender applicant was.

While taste-based discrimination affects transgender individuals, where the hirer may choose to underplay his or her own prejudice or personal taste in favor of emphasizing that of his or her coworkers, statistical discrimination affects the group as a whole, and the hirer’s personal feelings and perception play a significant role in this. McFadden (2020) suggested that in addition to gender stereotyping, genderism, which implies cultural ideology and differs

from the transphobic nature that depends on personal disgust or fear, also provokes statistical discrimination. D. B. Hill and B. L. Willoughby (2005) defines genderism as

...an ideology that reinforces the negative evaluation of gender nonconformity or an incongruence between sex and gender... a cultural belief that perpetuates negative judgments of people who do not present as a stereotypical man or woman...those who are genderists believe that people who do not conform to sociocultural expectations of gender are pathological. (p. 534)

Genderism, thus, is a societal belief that people would not like to accept any nonbinary gender or that there are only two sexes, male and female. Due to genderist beliefs, a potential employer may decide against hiring a transgender person if they believe that the applicant is physically or mentally ill. Correspondingly, an employer may decide against promoting or providing training for a transgender person if they anticipate sickness absence or resignation because of health issues. The aforementioned discussion has made it evident that in the labor market, prejudice against transgender persons can be founded on both statistical and taste-based grounds.

5 Findings

5.1 Employment Status of Transgender People in Hungary and Bangladesh

This part has emphasized the first study objective, which is to look at the employment scenario for transgender people in Hungary and Bangladesh. The discussion promises a range of insights, including a word tree analysis to help readers comprehend the diversity of ideas about respondents' own gender identities. To provide a comparative perspective on the occupational landscapes in both countries, they will also look at job statuses unique to each country. A case-specific network mapping regarding employment statuses is going to be included in this section, illuminating the interrelated variables affecting transgender people's working experiences. Comprehensive framework matrices that provide an in-depth understanding of employment trends and obstacles will define occupational categories in Hungary and Bangladesh. To provide readers with a deeper comprehension of respondents' experiences at work, readers will finally delve into qualitative insights from a word tree analysis on their thoughts about their professional situations. When taken as a whole, these studies hope to clarify the nuances of transgender job dynamics in various socio-legal and cultural situations.

5.1.1 *Gender identity from respondent point of view*

Before understanding the employment status of the transgender people in Hungary and Bangladesh we need to know how each of the respondent have expressed themselves apart from their legal gender identity. The word tree illustrates (Figure 6) the respondents' gender identity self-expressions, highlighting the richness and variety of their experiences. A key phrase in the word tree is "transgender," which has sub-words that correspond to different niche identities and expressions. For example, the tree contains conventional gender categories like "male" and "female," suggesting that even within a wider transgender range, some respondents continue to identify with these binary labels. Nevertheless, it also draws attention to more complex identities, such as the South Asian concept of "Hijra," and transitional idioms like "born as female but feels like male" or "born as male but identifies as female." These subcategories showcase individual experiences and the manner in which participants negotiate and express their own gender expression apart from their legal gender identity.

Additionally, the word tree integrates the junction of gender identification with other personal characteristics such as religion and educational level. As an example, a few respondents discuss how their religious beliefs—Hinduism, Islam, or Christianity, for example—intersect with their gender identity. For example, they discuss how someone who was "born male but identifies as female" falls under this category. They also describe having

degrees ranging from advanced to high school, indicating that their educational experiences may have an impact on or overlap with their gender identification. The extremely personal and even contradictory aspect of gender identity was demonstrated by the word tree, which also expresses sentiments and individual statements like unease with labels or a want to avoid particular terminology. The graphical representation emphasizes the complexities of gender identity as it was perceived and expressed by individuals in different cultural, religious, and educational situations.

The fluid and highly individualized nature of gender is underscored by the diverse expression of gender identity in the word tree, which illustrates that it cannot be fully captured by binary categories alone. Gender identity is frequently a multifaceted, developing experience for transgender individuals, influenced by a blend of personal emotions, societal norms, and cultural norms. The inclusion of religious and educational intersections further enhances the comprehension of the interconnectedness of gender identity with broader social contexts, as it is not isolated.

The diversity within the transgender community is exemplified by the variation in the ways respondents expressed their gender, from traditional binary identities to more nuanced, non-binary concepts like “*Hijra*.” Individuals navigate their identity in ways that are profoundly personal and influenced by a variety of external factors, and it is essential to recognize that gender identity is not static. This comprehension of gender expression not only challenges the conventional societal understanding of gender but also emphasizes the significance of establishing inclusive frameworks that respect and validate each individual’s self-identified gender, irrespective of legal or cultural norms.

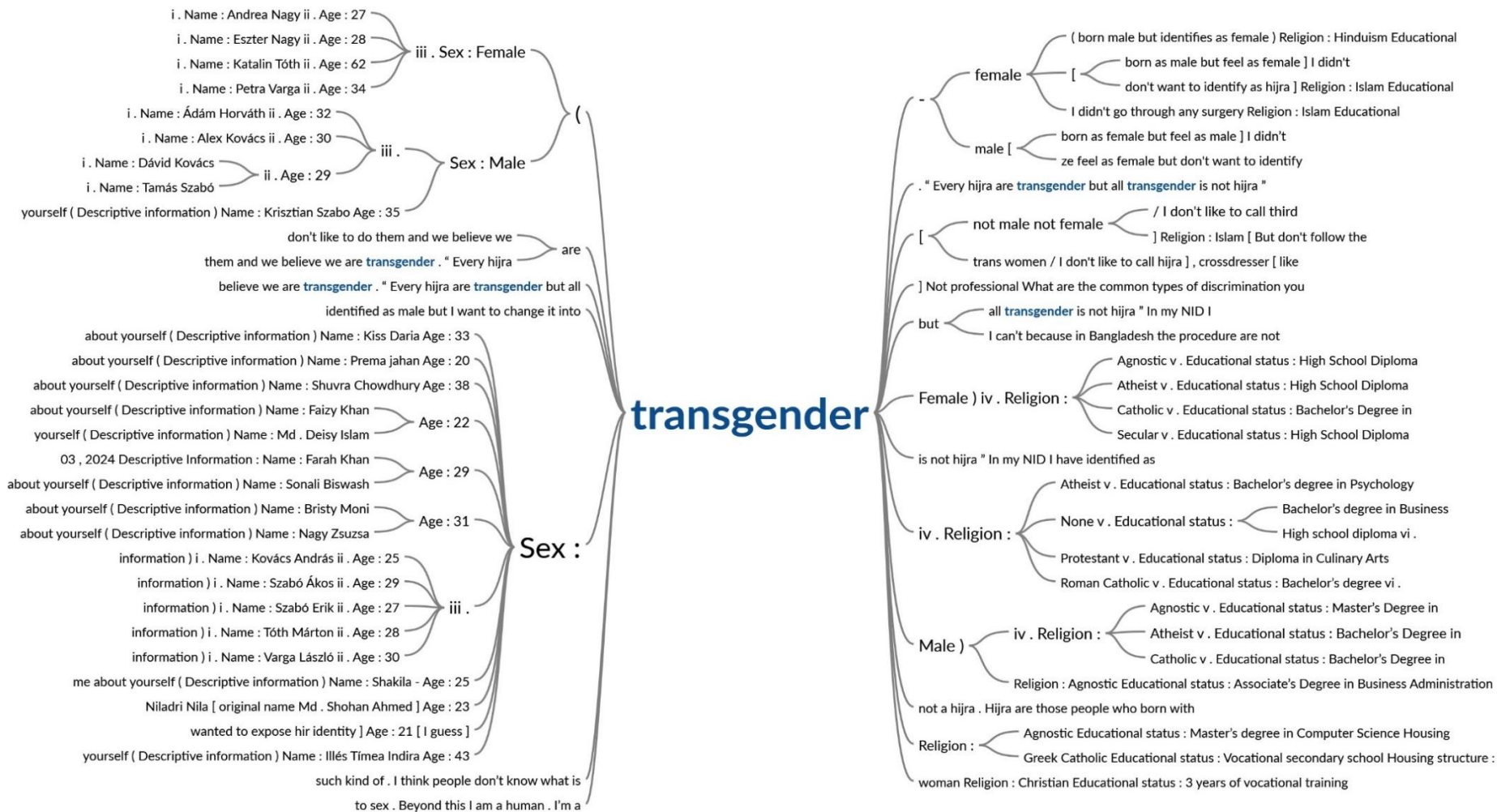


Figure 6 word tree on the opinion on overall respondents own gender identity.

5.1.2 *Employment status*

An overview of transgender respondents’ job statuses in Hungary and Bangladesh is given in the accompanying Table 6, which also shows significant disparities in respondents’ official and informal employment and unemployment rates. Compared to Bangladesh, where 21.74% of respondents, Hungary has a higher percentage of respondents in formal work (46.15%). In particular, 9.62% of respondents in Hungary were part-timers and 36.54% of respondents in Hungary were full-timers, whereas all respondents in Bangladesh who have official employment are full-timers and do not have any part-timers. This suggests that transgender people in Hungary have easier access to official job prospects.

Table 6 country specific employment status of the respondents.

Employment Status	Number of supporting cases from Hungary	Number of supporting cases from Bangladesh
Formally employed	18 (46.15%)	6 (21.74%)
Full-time	15 (36.54%)	6 (21.74%)
Part-time	3 (9.62%)	0 (0%)
Informally employed	2 (2.88%)	11 (54.35%)
Unemployed	4 (4.81%)	1 (2.17%)

(Source: Author Produces, 2024)

In contrast, transgender respondents in Bangladesh reported a far higher prevalence of informal employment than respondents in Hungary (2.88% vs. 54.35%). This implies that a higher percentage of transgender people in Bangladesh make their living through unofficial or unregulated labor. Both nations have comparatively low rates of unemployment; nevertheless, Hungary’s rate (4.81%) was a little higher than Bangladesh’s (2.17%). These discrepancies point to variations in the two nations’ official career prospects and levels of economic integration for transgender people, indicating the need for enhanced employment support and inclusion initiatives, especially in Bangladesh.

Additionally, the information above is also shown in the following figure. Several job statuses and the case studies that go along with them can be seen in the network tree diagram designated “Figure 7 case specific network mapping of the employment status“ The node “Employment status” is at the heart of the diagram, and it branches out into three primary categories: “Unemployed,” “Informally employed,” and “Formally employed.” Subcategories of each of these categories further subdivide into more focused nodes linked to different case studies designated as “Hungary cases” or “Bangladesh cases.” The nodes for the examples of Hungary and Bangladesh have been displayed as document-like icons. In general, this network

mapping highlights the richness and diversity within occupational categorizations and offers insights into employment trends and socioeconomic study.

Not only are the legal and socio-economic contexts of each country a factor in the disparities in employment statuses between transgender individuals in Hungary and Bangladesh, but they also reflect the broader societal attitudes toward transgender individuals. The significantly higher percentage of formally employed respondents (46.15%) in Hungary than in Bangladesh (21.74%) may be attributed to the country's relatively more developed legal infrastructure and greater societal recognition of transgender rights. Hungary's formal labor market integration of transgender individuals is anticipated to be bolstered by more accessible legal frameworks, stronger anti-discrimination laws, and a heightened awareness of LGBTQ+ rights. In addition, the establishment of advocacy groups and support organizations in Hungary may also facilitate the development of more accessible job opportunities and workplace accommodations. Despite this relative advantage, the data also indicates that transgender individuals in Hungary continue to face challenges in securing part-time employment. The fact that only 9.62% of respondents are currently employed part-time suggests that transgender individuals may be discriminated against or biased within the formal labor market.

In contrast, the employment landscape for transgender individuals in Bangladesh is significantly different, with 54.35% of respondents engaging in informal employment, as opposed to only 2.88% in Hungary. The high rate of informal employment in Bangladesh indicates that transgender individuals frequently have restricted access to formal job markets, which is why many of them rely on unofficial or unregulated labor to support themselves. Transgender individuals are frequently placed in precarious economic circumstances due to the absence of social protections, employment security, and reduced wages that are typical of informal work. The absence of targeted policies and legal frameworks that could facilitate transgender inclusion in formal sectors further exacerbates this situation. The relatively low unemployment rate in Bangladesh (2.17%) implies that some transgender individuals may still be able to secure employment. However, the prevalence of informal work underscores the systemic barriers that prevent them from accessing stable, regulated jobs. These results emphasize the necessity for both countries to improve employment support initiatives, with a particular focus on establishing formal employment pathways for transgender individuals in Bangladesh. Both nations can strive to enhance the economic integration and social mobility of transgender individuals by addressing these obstacles.

5.1.3 *Occupation Type, Job Position, Employment History- Hungarian chapter*

Similar to Table 8 a comprehensive comprehension of the respondents' varied experiences in the formal and informal occupations can be obtained by the framework matrix for the occupational status of respondents in Hungary (Table 7). The research highlights the noteworthy impact of their transgender identity on their careers, exposing a range of obstacles and prospects. This research explores the many tales that the participants told, focusing on their occupations, job descriptions, work experiences, and perspectives on their individual roles.

The matrix's occupational statuses not only serve to illustrate the diversity of positions that transgender individuals occupy in the labor market, but also offer a broader perspective on the cultural and structural challenges they encounter. Starting with informal employment, notably in industries such as sex work, Cases 21 and 22 illuminate the distinctive advantages and obstacles that are associated with this sector. The allure of sex work for transgender individuals is significantly influenced by the ability to manage one's schedule and income, as demonstrated by both respondents who work as in-person escorts (Case 21, 22).

Case 21 recognizes the autonomy of his position, but it also emphasizes the substantial obstacles that are commonly linked to his gender identity, including stigma, harassment, and increased personal risk. The vulnerability that transgender individuals in informal sectors frequently encounter is underscored by this experience of prejudice, as legal protections and access to healthcare or support services may be severely restricted. Nevertheless, Case 22, despite the fact that it faces comparable obstacles, derives more personal satisfaction and resilience from this profession. Case 22 experiences a sense of control and independence that mitigates some of the social and economic constraints encountered in other industries, despite the similar risks. The complexity of transgender individuals' experiences in informal sectors is exemplified by both narratives, which trade off personal autonomy and flexibility for societal stigma and the potential for physical and emotional damage.

The experiences that formal employment sectors offer, however, are significantly different from those of informal labor. For example, a social media manager (Case 16) at a marketing firm expresses satisfaction with the creative autonomy and digital engagement that their position provides, indicating a work environment that encourages creativity and autonomy. In specific professional environments, the positive aspects of employment for transgender individuals are reflected in the ability to express oneself freely, which is significantly enhanced by the individual's credentials and prior experience. Contrastingly, sales and retail associates (Cases 17, 3, and 18) offer a more complex perspective on transgender experiences in the formal labor market. For instance, Case 17 portrays the monotony and

inadequate compensation they endure in their role, despite their strong desire to pursue employment.

The difficulties of securing stable, gratifying employment are further exacerbated by discrimination based on gender identity, which leads to a dearth of promotional opportunities. In contrast, Case 3 derives pleasure from engaging with consumers; however, they are frequently beset by intermittent negative responses regarding their gender identity, which results in a work environment that is both rewarding and stressful. The necessity of inclusive workplace policies that not only address legal rights but also cultivate a supportive environment for transgender employees is underscored by this. Upon the occurrence of a traumatic event, Case 18 illustrates the significant impact of the work environment's emotional climate on the well-being of a transgender individual and the role of workplace culture in influencing the mental health outcomes of transgender employees. This case reflects a significant shift in job satisfaction.

The intersection of advocacy, personal fulfillment, and career challenges for transgender individuals is further illustrated by specialized positions, such as those held by NGO workers (Cases 1, 19) and freelancer graphic designers (Case 15). Case 1, a program coordinator for an NGO that advocates for LGBTQ+ rights, finds pleasure and purpose in her work, despite the systematic prejudice she endures. This underscores the significance of employment that facilitate activism and positive societal change. Despite the external obstacles imposed by gender identity, these roles offer a sense of accomplishment and congruence with one's personal values. In the same vein, Case 15, a freelance graphic designer, appreciates the creative freedom and independence that freelancing provides, but she also recognizes the stress and instability that are linked to irregular employment opportunities. Financial stability and career advancement are complicated by the unpredictability of freelance work, which is further exacerbated by concerns regarding gender recognition. The tension between autonomy and job security is underscored by these examples, which require transgender individuals to negotiate the trade-offs between pursuing careers that are in alignment with their inclinations and confronting systemic barriers that impede long-term financial success and professional development.

On the other hand, technical occupations at a higher level offer a more thorough comprehension of the complexities of the workplace for transgender individuals. As a consequence of their colleagues' inadequate understanding of the importance of gender identity, software developers, such as Case 11, frequently experience isolation. Nevertheless, they possess a high level of technical proficiency. Lack of peer support and comprehension can

result in feelings of exclusion and alienation, despite professional competence. On the other hand, administrative assistants (Case 2) have expressed feelings of underappreciation in their professional lives, despite finding satisfaction in their organizational roles, as they are frequently overlooked or dismissed as a result of their gender identity. This encounter with marginalization in the workplace, despite the fulfilled and essential responsibilities, underscores the persistent societal biases that transgender individuals face, even in positions that do not require technical skills. The two examples illustrate that transgender individuals are capable of achieving success in their professional positions; however, they frequently face significant emotional and social challenges that impede their career advancement and overall job satisfaction.

The discussion of uneven workplace acceptance and internal difficulties over transgender visibility has been offered by Software QA Managers (Case 4), illustrating different perspectives that can arise even in managerial roles. People in trade and civil organizations, on the other hand (Case 7) express how happy they have become in their jobs, but they also say that they feel unappreciated in them. Part-time employees like Case 8, who were jobless at the moment, yet convey optimism and contentment with past work experiences, highlighting the perseverance and resolve in pursuing acceptable job prospects throughout difficulties. More importantly, Employers' prejudices and ignorance about transgender identities have reflected in the experiences of the unemployed (Cases 12, 13, 14), which reveal systemic obstacles and difficulties in finding work. After a gender transformation, retired professionals like Case 23, a former high school teacher, talk about the difficulties with pension concerns, highlighting the financial and administrative obstacles that persist even after they leave employment.

Table 7 framework Matrix of the occupational status of the respondents of Hungary.

Occupation						
Type	Category	Occupational position	Case References	Job description	Occupation history	Opinion on their job
Informal	Sex Worker	In-person	21, 22	<i>I work as an escort, providing companionship and intimate services to clients. It's a job that allows me to control my own schedule and finances.</i>	<i>I entered the escort industry out of necessity and choice. I found clients through online platforms and referrals from other sex workers.</i>	Opinion of case 21, <i>I enjoy aspects of the work, but the stigma and discrimination I face because of my gender identity make it challenging and sometimes dangerous.</i>
						Opinion of case 22, <i>Despite the challenges, I find fulfillment in my work. However, the discrimination and stigma I face due to my transgender identity can be overwhelming at times.</i>
Formal	Full time	Social Media Manager	16	<i>I work as a social media manager for a marketing agency. My job involves creating content, managing social media accounts, and analyzing engagement metrics.</i>	<i>I applied for this job online and went through several rounds of interviews... My qualifications and previous experience helped me secure the position.</i>	<i>Overall, I enjoy my work. It allows me to be creative and I like the digital aspect of it.</i>
		Sales/retail Associate	17	<i>I work as a retail associate in a local store. My job involves stocking shelves, assisting customers, and operating the cash register.</i>	<i>I applied to several places and this was the only one that offered me a position. I suspect my transgender identity may have been a factor in other places rejecting my application.</i>	<i>It's a job, but I wouldn't say I enjoy it. The pay was low, and the work can be monotonous. However, it's difficult to find other employment opportunities, especially as a transgender woman in a conservative community.</i>
			3	<i>I work as a sales associate at a retail clothing store. My responsibilities include assisting customers, managing inventory, and handling sales transactions.</i>	<i>I got this job through a friend's recommendation and after going through a standard interview process. The store management seemed relatively open-minded during the hiring process.</i>	<i>I enjoy interacting with customers and helping them find what they need. However, the job can be stressful due to occasional negative reactions from customers or colleagues regarding my gender identity.</i>
			18	<i>I used to work as a sales representative for a pharmaceutical company. My job involved meeting with healthcare professionals to promote our products and generate sales.</i>	<i>Initially, I enjoyed the challenge of sales, but that changed after a traumatic incident... I applied for the position online and went through multiple rounds of interviews. My experience and qualifications helped me secure the job.</i>	<i>Initially, I enjoyed the challenge of sales, but that changed after a traumatic incident.</i>
			10	<i>I work on the assembly line.</i>	<i>I don't know.</i>	<i>I like doing it... I am fortunate to have found a more accepting group, but mostly I have worked in places where this was not acceptable.</i>

Freelancer Graphic designer	15	<i>I work as a freelance graphic designer. I take on various projects from clients both locally and internationally, but finding consistent work in a company was challenging without proper gender recognition.</i>	<i>I started freelancing because it was impossible to secure a traditional job. Freelancing allows me to work without the need for constant in-person interactions, where my gender identity often leads to discrimination.</i>	<i>I enjoy the creativity and flexibility of freelance work, but the instability and lack of formal employment benefits were stressful.</i>
NGO Worker	1	<i>I work for a non-governmental organization (NGO) that focuses on LGBTQ+ rights and advocacy. As a program coordinator, I'm responsible for developing and implementing initiatives to support transgender individuals and address issues of discrimination and inequality...</i>	<i>I applied for the position through a job posting and went through a rigorous interview process. My background in social work and my passion for LGBTQ+ advocacy helped me secure the position.</i>	<i>I find immense satisfaction in my work. It's fulfilling to be able to contribute to positive change and support the transgender community. However, I also face challenges in navigating systemic discrimination and limited resources.</i>
	19	<i>...As an outreach coordinator, I manage programs that provide support and resources to marginalized communities, including the transgender population.</i>	<i>I found this job through a network of friends and colleagues involved in social work. My experience in community organizing and my dedication to social justice were key factors in securing this position.</i>	<i>I am passionate about my job because it allows me to make a tangible difference in people's lives. However, it's also emotionally taxing due to the constant exposure to discrimination and social injustices.</i>
Customer Service Representative	20	<i>I work as a customer service representative for a telecommunications company. My job involves handling customer inquiries, resolving complaints, and processing service requests.</i>	<i>My qualifications and previous customer service experience helped me secure the position.</i>	<i>I enjoy the work itself, but the conditions and treatment I face were challenging and often unfair.</i>
Software Developer	11	<i>I work as a junior software developer at a tech startup. My duties include coding, testing software, and collaborating with the development team on various projects.</i>	<i>I got this job through a combination of applying online and networking at industry events... My skills and experience were strong selling points, but I had to address concerns about my gender identity during the interview process.</i>	<i>I enjoy the technical challenges and the innovative environment... However, I sometimes feel isolated due to the lack of understanding and acceptance of my gender identity among some colleagues.</i>
Administrative Assistant	2	<i>I work as an administrative assistant in a mid-sized company. My role involves managing office tasks, coordinating schedules, and assisting with communications and documentation.</i>	<i>I secured this job through a combination of networking and a strong recommendation from a previous employer. I also had to undergo a rigorous interview process.</i>	<i>I enjoy my job because it allows me to utilize my organizational skills and interact with different departments. However, I sometimes feel undervalued due to my gender identity.</i>
Software QA Manager	4	<i>Mainly the testing process and organizing the work, communicating between clients and my team, and helping the team were my main tasks.</i>	<i>I started at the company before my transition, around the time it was founded, several years ago.</i>	<i>It's not my dream, and I hope to change in the near future, but I don't hate it or anything. ... There's no problem with the job itself, and my colleagues were mixed; some were accepting and supportive, and others do not think trans people should exist, but they mostly just hate internally.</i>

	Warehouse worker	5	[didn't answer properly]	[didn't answer properly]	Mainly due to not looking like a woman as stated in my ID. Unfortunately, after the 2020 paragraph 33, I can no longer change my gender. Employers find it uncomfortable and say that trans people require a lot of attention to detail.
	Restaurant worker	6	Full-time job holder	It was easy, I just had to apply.	Yes, I love it. Everyone was accepting.
	Medical secretary	9	medical secretary ... Full-time job holder	[didn't answer properly]	Yes Yes. There were... I don't applaud them either, but I don't hurt them.
Part-time	Trade, creative work, civil organization	7	[no comments]	Through an interview. I already had it before my transition. For other jobs, my gender identity was not important.	I like some of the physical work or order preparation. My colleagues see it similarly. However, I do not like my job in trade; I don't feel valued.
	Junior manager	8	As I am currently unemployed, I do not have a job to discuss. I am actively seeking employment opportunities in various fields...	Through personal contacts.	I really like my job; I can definitely say I love it, even though it's only part-time next to the university.... Sometimes it's exhausting, but I'm really pleased with it.
Unemployed	Unemployed	12, 13, 14	Being unemployed was challenging and often leaves me feeling anxious and uncertain about the future. I am eager to find suitable employment where I can utilize my skills and contribute to society.	Many employers may harbor biases or lack understanding about transgender individuals, making it difficult to secure job opportunities.	I have applied to numerous positions but have not been successful in securing a job.... It's frustrating and disheartening to be unable to find work. I want to contribute and be financially independent, but the constant rejections were very discouraging.
	Retired	Former Senior High School Teacher	23	I worked as a high school literature teacher for over 35 years. I retired a few years ago but have faced significant issues with my pension due to my gender transition.	I started teaching right after university. I had to keep my gender identity a secret for most of my career due to the conservative environment in education.

(Sources: Author produces, 2024)

The present study's comparative examination of case examples from several professional sectors in Hungary (Table 7) highlights the intricate relationship between transgender persons' experiences of personal fulfillment and the systemic obstacles they encounter. For everyone, regardless of gender identity, it has emphasized the value of supporting legislation, inclusive workplace practices, and public awareness to improve professional possibilities and well-being. The research, in summary, shows that although a small percentage of transgender people are happy and fulfilled in their jobs, many still encounter major obstacles, such as prejudice, a lack of awareness, and difficulties finding steady work. To enhance the professional standing and general well-being of transgender people in Hungary, working settings that were more welcoming and encouraging are crucial. These experiences varied greatly between kinds of employment.

5.1.4 *Occupation Type, Job Position, Employment History- Bangladesh chapter*

The Table 8 displays a comprehensive framework matrix that classifies transgender respondents' experiences and employment status in Bangladesh, emphasizing their responsibilities in both the formal and informal job sectors. The work experiences of those surveyed in Bangladesh show how social acceptance, official and informal employment, and individual identity interact in a complicated way. Despite their lack of official acknowledgment and social status, these deeply ingrained traditional roles provide a sense of identity and belonging. Traditional *Hijra* Giri practices including begging, dancing at rituals, and prostitution are widely practiced in the unofficial sector. These positions are filled by leaders, or gurus, and their followers.

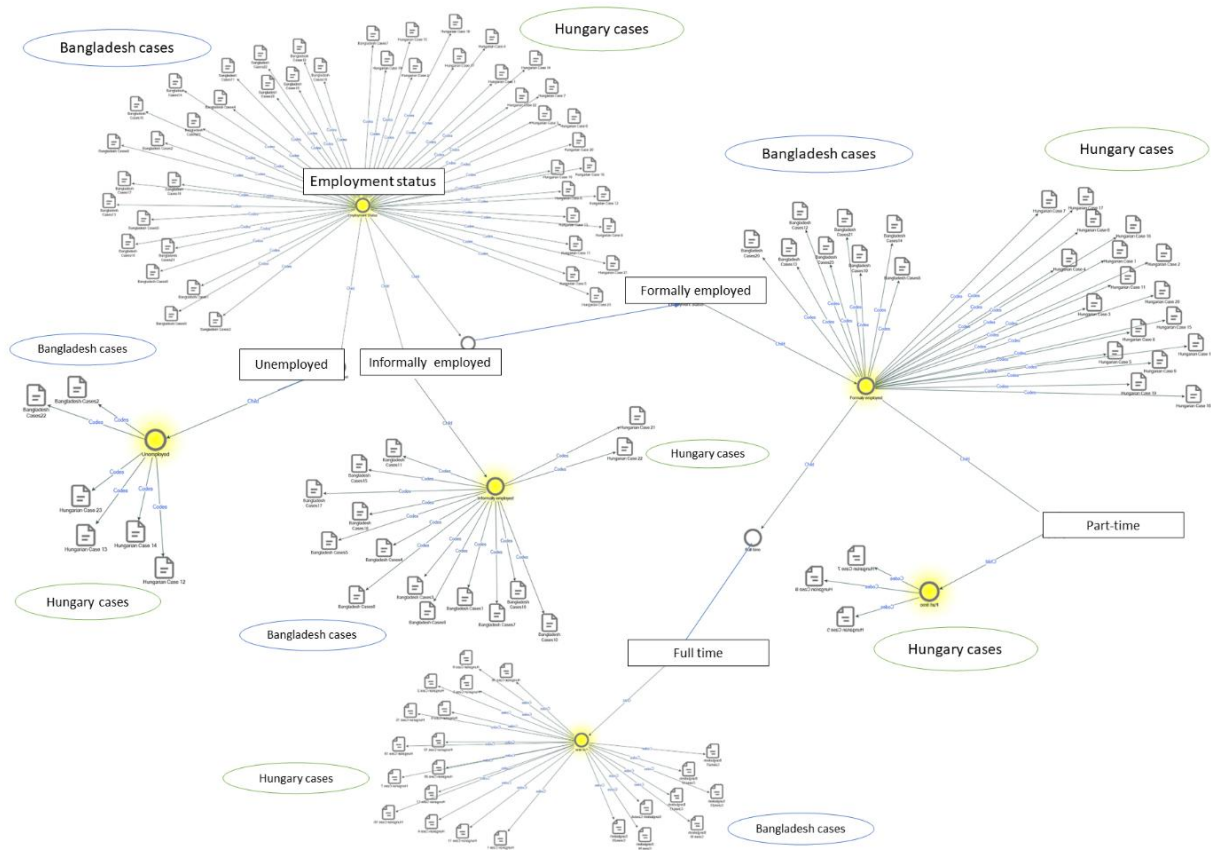


Figure 7 case specific network mapping of the employment status.

Leaders, sometimes called *Guru Ma*, a Bengali word *Guru ma* means “Mater of mother”, supervise communal matters, engage with more senior members, and assist fellow *Hijras*. Cases 1, 6, and 17 show how leaders come into their positions by default; they frequently begin as disciples and get training at an early age. Despite social obstacles, these leaders exhibit a sense of responsibility and acceptance of their roles. Typically, gurus have been in charge of overseeing neighborhood problems and upholding connections with outside parties. Typically, disciples engage in activities like as dancing, begging, and occasionally prostitution.

The primary activities of disciples, or *Chela*, in the *Hijra* culture are based on a combination of traditional and frequently stigmatized occupations. These activities typically involve begging, performing at cultural or religious ceremonies, and, in certain instances, engaging in sex labor. The *Hijra* community’s diverse labor histories and job descriptions are illustrated in Cases 3, 4, 5, 7, 9, 15, 16, and 18. Many disciples enter the community at a young age, either because of personal choice or familial rejection, indicating the intersection of gender identity and social exclusion. The experiences of these disciples are not uniform; some individuals express dissatisfaction with the traditional roles of the community, while others

embrace them. For instance, Case 9 illustrates a sense of dissatisfaction with begging, which is frequently perceived as a socially unacceptable occupation in spite of its necessity for the survival of numerous members of the community. Case 5, on the other hand, emphasizes a more pragmatic viewpoint, as certain disciples, despite the societal stigma, prefer sex work because of the increased income it delivers. The social stigma associated with such work is in stark contrast to the financial autonomy it provides, illustrating the conflict between social acceptance and survival. Furthermore, Case 7 offers a glimpse into the emotional and physical toll of participating in ceremonies, such as dancing, a task that is culturally significant but is often devalued by society, despite its physical demanding nature. The difficulties encountered by *Hijra* individuals in these positions are exacerbated by the physical nature of the work and the societal perception of dancers' occupations as less legitimate.

The *Hijra* community's involvement in sex work is further complicated by the presence of those who indulge in virtual sex work. In Cases 10 and 11, respondents describe engaging in prostitution with the intention of utilizing the income to transition to more socially acceptable, high-profile positions after graduation. These individuals exhibit a practical, goal-oriented approach to their work, recognizing it as a means to access more substantial economic opportunities. These respondents appreciate the financial incentives that sex work offers, which allows them to pursue education or training for future employment, despite the societal criticism that surrounds it. The respondent's specific interest in teaching dance, which is a combination of personal passion and financial necessity, is particularly noteworthy in Case 11. This aspiration is indicative of the respondent's aspiration to transition from a stigmatized profession to a more respectable role, which indicates a desire for both professional fulfillment and societal respect. This illustrates the intricacies of navigating gender identity and career aspirations within the *Hijra* community.

Conversely, the degree of social acceptability that transgender individuals encounter in formal sectors is contingent upon their work environments. In Case 12, a Chela is employed at a private company's contact center, where they are responsible for the management of orders and communications. The respondent acknowledges the social respect and stability they receive at work, despite feeling conflicted about the loss of the freedom of gender expression that was once cherished within the *Hijra* community. The tension that transgender individuals frequently encounter in formal employment is underscored by the experience: they may acquire societal respect in the workplace, but at the expense of their personal sense of autonomy and gender expression. This dichotomy underscores the more extensive obstacles associated with reconciling personal identity with professional expectations. In contrast, Case 21 reports a

significantly simpler transition into formal employment through event management, where they serve as a senior executive responsible for the supervision of programming and events, including those for children. This respondent reports that they were hired through conventional application processes, and they encountered no substantial obstacles during the recruiting process. Transgender individuals may encounter fewer obstacles and experience a more positive and tolerant work environment in specific formal sectors, such as event management, as this example illustrates. The experience of Case 21 demonstrates how certain industries can offer a more inclusive and supportive professional experience by facilitating simpler transitions and reducing stigmatization in comparison to other more conservative sectors.

Freelance work, as illustrated in Cases 13 and 19, is a unique employment opportunity for transgender individuals, as gender identity is less of a hindrance. Both respondents began their professional careers during the COVID-19 pandemic and currently work in the fields of online graphic design and YouTube video development. Traditional employment may not offer them the same level of independence as these freelance professions, and they have expressed satisfaction with their work. The digital sector appears to be a more adaptable and tolerant industry, where skills and creativity are prioritized over gender identity. In these positions, transgender individuals are able to concentrate on their professional development and abilities without the constant scrutiny or bias that is frequently encountered in conventional work environments. Many transgender individuals who are seeking an escape from societal prejudices in more rigorous, formal work structures find refuge in the flexibility and autonomy that these disciplines offer. Freelance work provides an alternative to the discrimination and exclusion experienced in more traditional sectors, providing a platform for financial stability, creativity, and self-expression.

Table 8 framework Matrix of the occupational status of the respondents of Bangladesh.

Occupation		Occupational position	Case references ⁴	Job description [quotes]	Job History [quotes]	Opinion on their job [quotes]
Type	Category					
Informal	Hijra Giri ⁵	Leader [Guru ma ⁶]	1	<i>I used to take care of these [that place have community and about 10 to 15 Hijra people leave there] Hijras and communicate with our seniors and tackle the local problems...</i>	<i>At the age of 11, when my parents [ze used a slang for their parents] kick me out of their home, I came to my guru-ma [previous leader of this community] and ze have trained me to do this job.</i>	<i>Ze were used to do begging and mugging activity before becoming the leader of this community, ze have been in these community from hir early childhood and have trained for these Hijra Giri...</i>
			17	<i>I used to look after these [there was a community there, and roughly eight to ten Hijra individuals left there] Hijras, interact with our elders, and handle neighborhood issues.</i>	<i>From my childhood I am here, and this was my acquired status. I have shown my capability to protect this community and after my Guruma I get this responsibility</i>	<i>Since there isn't anything else to do, I'm feeling alright. .. we have been raised in this manner since we were young... it's a historical position ...</i>
			6	<i>.... My prime responsibility was to make a bridge between all people like the Bazar committee, Government office and my Hijra community. We follow this central southern part.</i>	<i>From my childhood I have been working in this community. Before the death of my Guru ma [previous leader] ... I have received dikkha⁷ [some kind of coronation] as a next Guru ma and I have traveled in other communities to see their activities and leaned the Hijra Giri.</i>	<i>As there was no other chose to do so there was no reason of expressing any feeling but continuing the traditional jobs/means of leaving... I respect this job and love to do it.</i>
		Disciple [Chela ⁸]	3, 4	<i>...primarily begging and dancing in the marriage ceremony... I used to collect money from the market and marriage ceremony</i>	<i>From my childhood, I am here.</i>	

⁴ Case reference represents each case ID.

⁵ Hijra Giri is a term for a certain type of vocation, and it refers to those who like mugging and begging while identifying as hijra.

⁶ The Bengali word *Guru ma* means “Mater of mother.”

⁷ *Dikkha* is a Bengali word which rooted from ancient Indian word “diksha” which means “the rite performed prior to the Vedic sacrifice in order to consecrate its patron, or sacrifice” Britannica, T. E. o. E. (2015). diksha. In *Encyclopedia Britannica*.

⁸ The Bengali word *Chela* means “the working person for Guru ma”.

5, 9	<i>Hijra Giri [begging and prostitution]</i>	<p>Story of <i>Hijra Giri</i> [Case 5] <i>One day, I hear about this place and left [voluntary] from my family and start living with this people. This was not my village [ze didn't mention hir parental resident]. I used to belong a well-off family. However, my leader has taught me lots of study and from my age 16 I used to earn money by this job....</i></p>	<p><i>Opinion of case 5</i> <i>I love to do prostitution not collecting...I used to earn more in prostitution rather market collection[begging] ... But I can't say loud in public about my profession which make me sad ... People do worse excrement... No recognition ... No social status [even in the community]</i></p>
		<p>Story of being prostitute <i>... During class six one of my friends fucked me and I was enjoying it and one day I caught by my neighbor, but ze blackmailed me and have intercourse with me couple of time.</i></p>	<p><i>Opinion of case 9,</i> <i>I don't like this job. Because asking money to people don't bring me any prestige. If I have a grocery, then I would enjoy my profession.</i></p>
		<p><i>From my childhood, I am here. I have to prove that I am a Hijra. I have learned to dance and talk, clapping. [Case 9]</i></p>	
	<p><i>I used to collect money from different programs, especially in marriage ceremony. ...we performed dance [which was not formally invited and not so accepted by the local people, but the respondents used to forcefully do it and then demand of money] and get money. ... sometimes I used to do stage performance in different occasion....</i></p>	<p><i>From my childhood I have been working in this community. [some kind ascribe status] ... I used to dance well so my guru ma used to send me for doing it.</i></p>	<p><i>I feel good since I am not doing any criminal activity like a thief. I am earning money by hard work. Our dance style was very hard. You can't do it easily. We must learn it from childhood.... used to higher me in their function to see my dance in different cultural program.</i></p>
15, 16	<p><i>I used to collect money by presenting dance with newborn baby</i></p>	<p><i>After my age of 16 I have joined with this community and learned how to dance and talk...My guru ma has taught me all these activities</i></p>	<p><i>Opinion of case 15,</i> <i>Its good. ... But not every time when people afraid of us and treat as an alien ...</i></p> <p><i>Opinion of case 16</i> <i>People don't want to give us money and we have to force them to get our money. It was our right ...</i></p>
18	<p><i>I used to collect money from local market and dancing in newborn baby's home.</i></p>	<p><i>From 2017, I have talked with our Guruma [leader of that Hijra community] and ze help me to do this work.</i></p>	<p><i>Not so good.</i> <i>I feel sad when I ask people for money.</i></p>

	Sex worker	Virtual	10, 11	<i>I earn money by doing sex. But after my graduation I will join in other prestigious work.</i>	<i>We [showing hir roommate] have been friend from childhood and from 2019 we were doing this job.</i>	Opinion of case 10, <i>I'm feeling good. [laugh] easy to earn money...But I can't tell anyone, even my family.... Nothing specific...I'm earning enough ... I love it. Though sometimes I feel sad but it's okaymy teacher has fucked me, my cuisines have fucked me, since I have enjoyed it so what's wrong</i>
						Opinion of Case 11, <i>easy to earn money ... virtual Sex worker [but wanted to be a dance teacher and from childhood Zee have been learning dance as male person but love to wear female cloth and dance life female]</i>
Formal	Call center job	Private organization	12	<i>My organization was an international organization ... In this organization I used to receive the call and products' order and let know our seals department.</i>	<i>... for few months I was with the Hijra community, but I don't feel good to be with them. It seems to me that you know like classless people. On the contrary I have a freedom of expression in those days when I wanted to make over then I can do, when I wanted to wear dress like female, I can do which was not possible now...</i>	<i>I am getting social respect through this job but I can't expose myself...</i>
	Event management	Senior executive	21	<i>I design different program, color selection, venue management, and hosting a program... We specifically organize program for children.</i>	<i>From my childhood I was desire ... General way like giving interview ...</i>	<i>I like this job...I didn't get any challenge ... My recruitment happens in normal ways</i>
	Freelancer	Self employed	13	<i>I used to do freelancing, online graphic designing</i>	<i>I have taken some online courses about freelancing and after Covid-19 I have begun fulltime worker...</i>	<i>Its good. I work for me... Actually, my job was online based so, I don't face any challenge because of my gender identity... My clients want result not my identity.</i>
			19	<i>I used to work online. YouTube content creator...</i>	<i>I have had online training, and some point I have learned from my friends.</i>	<i>It's okay. But after my graduation I would like to join in a government job.</i>
	Small Business/ Entrepreneur	Owner	8	<i>Entrepreneur [have a Beauty parlor/ makeup artist] & activist [Pothchola Foundation] ... Now I am working as a make artist, and I have a beauty parlor [in Savar, Dhaka, Bangladesh] from 2022, you can call me an entrepreneur. Besides I also work as a Activist to Pothochola Foundation. [https://www.youtube.com/watch?v=_GD83E1SZ28]</i>	<i>I have had a training on makeover and get some fund from UNDP. They have helped me to set up this beauty parlor where I work now.</i>	<i>I'm feeling good. I love to do makeover ... Besides, I love to work for transgenders like me. I used to try to help them and to date our organization have helped over three thousand transgenders to get employed. I enjoy my work....</i>

			20	Poultry seller		<i>I just open this business.</i>	<i>I have to do this job. Since I don't have any higher education so won't be able to get any job... It's okay. But after saving more money I will expand my business.</i>
			23	<i>I used to sell cosmetics product...</i>		<i>My father helped me to manage the investment ...</i>	<i>I used to sell cosmetics product ... It's good. I am having my own business and freedom but not freedom of my sexual expression due to social reason.</i>
	NGO worker	Area manager	14			<i>After a public circular, I have applied and gone through several process.</i>	<i>It's okay... Though my voice was [you can see] relatively fishy but I didn't face any challenge.</i>
	Par-time	--	--	--	--	--	--
Unemployed	Actively seeking job		2,	<i>As I am currently unemployed, I do not have a job to discuss.</i>		<i>I am eager to find suitable employment where I can utilize my skills and contribute to society.</i>	<i>Opinion of case 2</i>
		22					<i>...Being unemployed was challenging and often leaves me feeling anxious and uncertain about the future.</i>
							<i>Opinion of case 22</i> <i>Securing employment as a transgender individual poses unique challenges. Many employers may harbor biases or lack understanding about transgender individuals, making it difficult to secure job opportunities.</i>

(Source: Author produces, 2024)

Entrepreneurship and small company ownership, however, can provide possibilities and difficulties for those surveyed. Various business endeavors, such as operating a beauty salon and selling chicken and cosmetics, have been shown in Cases 8, 20, and 23. To start their enterprises, these respondents got financial support, training, or family support. As seen in Case 23, they also draw attention to issues around gender presentation in social contexts, even though they typically express happiness with their business endeavors and the flexibility they offer. Additionally, Case 8, in which the respondent simultaneously assumes the roles of entrepreneur and activist, serves as an example of entrepreneurship. Maintaining a beauty salon and collaborating with the *Pothochola Foundation*, a local NGO which role was to work for transgender people's development, they highlight the assistance they have received and the positive influence they have on the transgender world. To enable transgender people to build sustainable livelihoods and support their communities, this instance emphasizes the beneficial effects of outside assistance and training.

Transgender people's unemployment, as seen in Cases 2 and 22, highlights the ongoing obstacles they have while trying to find acceptable career possibilities. Despite their active job search, some respondents worry about the future and exhibit anxiousness. Biases in society and a lack of knowledge about transgender individuals have been frequently the cause of this difficulty in finding employment, which makes it hard for transgender people to find roles where they can use their abilities and make a significant contribution.

Notwithstanding, the information shows that transgender people in Bangladesh have a remarkably diverse range of professional experiences (Table 8). While official employment offers varied degrees of social esteem and obstacles, informal occupations frequently bind respondents to conventional community roles. There has been less discrimination based on gender identification and greater liberty in the freelancing and entrepreneurial sectors. The need for more inclusive work practices and public acceptability is highlighted by the fact that finding suitable employment is still a key issue.

5.1.5 Respondents' feelings on working position

The word tree (Figure 8) visualization derived from the text search query "feeling about your occupational position" offers a thorough examination of the opinions held by Bangladeshi respondents about their employment situation. There can be definite parallels and divergences between these emotions and those of transgender people in Hungary, underscoring the difficulties that transgender groups in both nations confront.

Regarding their professional roles, referencing situations from the Hungarian context, such as cases 21 and 22 (involving sex workers), have demonstrated that, despite having control over their income and schedules, individuals have been subjected to prejudice and stigma because of their gender identification. Like this, people in formal industries like example 16 (social media manager) and case 11 (junior software engineer) have appreciated and liked their work despite feeling marginalized because of their gender identification. They have also enjoyed the creative and technical components of their occupations. These incidents show how discrimination at work has a long-lasting negative emotional impact and how difficult it can be to be accepted and acknowledged.

Similar emotional difficulties in their professional roles have also been encountered by *Hijra* people in Bangladesh. Bangladeshi respondents have voiced a wide range of challenging feelings. Feelings of sadness, disapproval, occasional pain, and depression were typical emotions. These emotions have been caused by the fact that, despite being born male, the individual identifies as transgender, posing serious social and financial obstacles. Many have expressed dissatisfaction with their work, which is indicative of a larger problem of marginalization and exclusion in society. Their major responsibilities, which include begging and unpaid labor, have not offered them the security or respect that comes with regular employment, which has added to their sentiments of unhappiness and unfulfillment.

In comparison, there have been significant differences in the type of employment and the scope of official career prospects, even if Hungary and Bangladesh have both demonstrated that transgender persons experience substantial emotional issues surrounding their occupational situations. Though they continued to encounter conflicting attitudes and institutionalized discrimination, transgender people in Hungary have become increasingly successful in obtaining formal jobs. In contrast, there were fewer formal work options accessible in Bangladesh, where more informal occupations have predominated. Bangladeshi respondents, who frequently feel resigned to their conditions, have felt more dissatisfied and marginalized as a result of this imbalance.

All things considered, the word tree and case examples highlight the continuous difficulty transgender people have in Hungary and Bangladesh to get respectable and meaningful jobs. Although there are some distinctions in the kind of jobs that are accessible, both situations demonstrate the significant influence that structural restrictions and social perceptions have on transgender people's feelings about their careers.

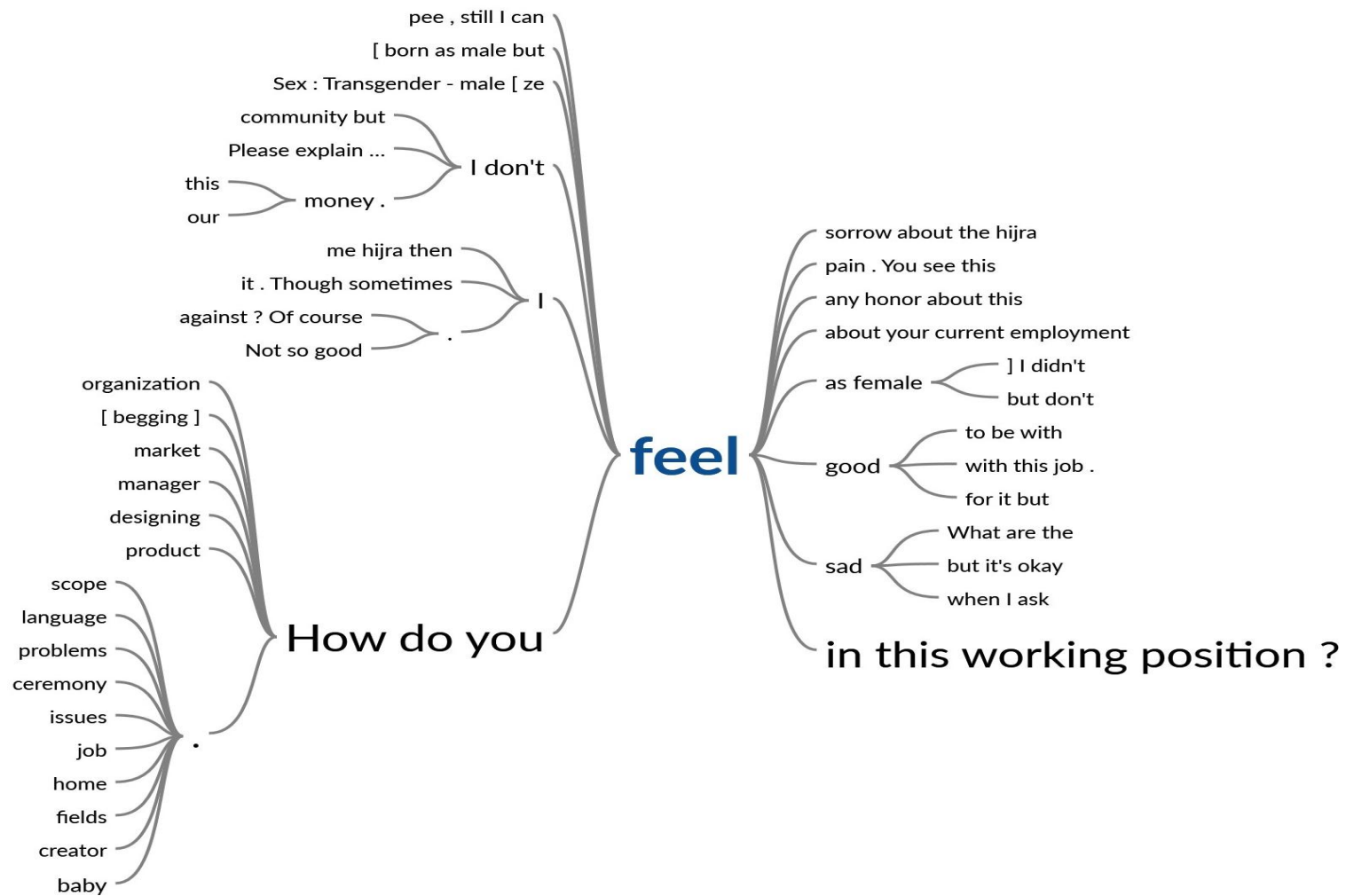


Figure 8 word tree on the overall respondents answers on “How do you feel in this working position?”.

5.2 Exploring the Influence of National Legislative Movements on Mainstream Perceptions of Transgender People's Occupational Involvement

In this sub-section, readers are going to examine study objective 2, with a particular emphasis on the effects of various national legislative initiatives on the public's perception of transgender people working in mainstream fields. Specifically, attention will be paid to the effects of these initiatives. An intricate framework matrix was used to collect responses from respondents in Hungary and Bangladesh. The primary focus of the investigation is on the perspectives that were obtained from those respondents. According to these matrices, the public's perceptions of transgender people and the implications of those perceptions are explained.

Following that, the section advances to the next step, which is to evaluate the opinions of respondents concerning the more far-reaching implications of national legislative systems. In order to gain a better understanding of the ways in which legal frameworks influence social attitudes regarding the inclusion of transgender individuals in a variety of occupational settings, this is done. To gain a comprehensive understanding of the intricate relationship that exists between legislative changes and public perceptions of the roles that transgender people play in mainstream workplaces, it is possible to provide a comparison of the perspectives and legal implications of the two countries. Consequently, this comparative analysis sheds light not only on the differences in perceptions and legal implications, but also on the cultural differences that are present throughout the world.

5.2.1 Public perception about transgender and its consequences- Hungary chapter

Following the research objective 2, the information shown in Table 9 demonstrates how respondents from Hungary perceived the public's views on transgender people and the laws that influence them, especially in the workplace and in wider social interactions. Transgender individuals have been the subject of public disdain in Hungary for an extended period, which has bred pervasive prejudice and discrimination. This societal bias has been particularly pronounced for transgender sex workers, as evidenced by Cases 21 and 22, who have reported experiencing substantial stigma and harassment from both law enforcement and the general public.

Transgender sex workers frequently encounter disproportionately high rates of targeting, which includes social exclusion from fundamental services, limited access to legal representation, and frequent arrests. They are ensnared in precarious circumstances that endanger their safety and rights as a result of legal and societal marginalization. The magnitude

of the hostility that transgender individuals experience is emphasized by the verbal and physical assaults they endure from both clients and police officers. These workers are frequently denied access to support services, which exacerbates their vulnerability by excluding them from safe working environments. These results underscore the pressing necessity for legislative reforms that not only safeguard transgender sex workers but also establish secure environments in which they can work with dignity and access the requisite legal and social resources to protect them from abuse.

In the same vein, workplace discrimination in Hungary is indicative of more general societal attitudes and prejudices toward transgender individuals. In contrast to the informal sector, transgender employees are more formally acknowledged in the workplace; however, they continue to encounter systemic discrimination, as demonstrated by the experiences of social media administrators from Case 16. These employees have reported instances of insensitivity and microaggressions from their colleagues, such as the inappropriate use of pronouns and insensitive remarks regarding their gender identification. This conduct not only erodes their professional credibility but also fosters an environment of workplace tension and social marginalization. The profound psychological effects of the inability to receive appropriate recognition or advancement as a result of these biases frequently lead to a diminished sense of personal fulfillment and job satisfaction. These attitudes are indicative of profoundly ingrained cultural and societal biases that persist in shaping the way transgender individuals are perceived and treated in the professional sphere, thereby exacerbating the emotional burden that comes with social and professional exclusion.

The discrimination experienced by transgender individuals in more visible sectors, such as sales and retail, serves as an additional indicator of the broader societal biases against their gender identity. The persistent and ubiquitous nature of discrimination that transgender workers encounter, from both consumers and employers, is underscored by Cases 3, 17, and 18. Transgender employees have reported encounters with misgendering, physical threats, and offensive remarks, all of which have exacerbated their feelings of insecurity and alienation in the workplace. This societal hostility presents a challenge for transgender workers in achieving professional and personal satisfaction, as the negative attitudes and discriminatory behaviors they encounter are obstacles to job advancement and equal treatment. Their marginalization is further perpetuated by the absence of respect and recognition for their contributions, which necessitates them to navigate systemic prejudice in their daily work interactions.

Additionally, transgender individuals employed in a variety of sectors, such as independent contractors (Case 15) and assembly line laborers (Case 10) have continued to be

negatively impacted by public attitudes. Assembly line workers reported instances of intimidation and ridiculing, which is indicative of a workplace culture that condones discriminatory behavior. In contrast, freelancers have encountered job rejections and social alienation in professional environments, as their gender identity is used as a basis for bias rather than their qualifications or abilities. These prejudices have impeded the ability of transgender individuals to establish professional networks and establish credibility in their respective disciplines, as they are frequently denied the respect and recognition that are essential for establishing long-term career prospects. This demonstrates the extensive influence of societal discrimination on the professional aspirations and career sustainability of transgender individuals, extending from traditional employment to independent work.

The experiences of NGO workers (Cases 1 and 19) also demonstrated the emotional toll of confronting racism and systemic prejudices, as they reported challenges despite possessing the requisite qualifications. The barriers they confront in the workforce are further entrenched by the pervasive societal preconceptions they face, which make it difficult for them to secure financial stability or obtain meaningful employment. Furthermore, software developers (Case 11) and customer service agents (Case 20) frequently experienced microaggressions and social exclusion from work-related social events. This underscores the extent to which the broader societal prejudice that affects transgender individuals in their personal lives also affects their professional lives. These exclusionary practices exacerbate transgender employees' social isolation and impede their career advancement by preventing them from completely engaging in work-related social networks and professional opportunities.

Furthermore, administrative assistants (Case 2) and software quality assurance supervisors (Case 4) have encountered substantial obstacles as a result of the stereotypes and suspicions that surround transgender individuals. These individuals have reported being misgendered, excluded from professional opportunities, and the recipient of disparaging remarks from their colleagues. Significant obstacles to the professional success and recognition of transgender individuals are posed by these prejudices, which are frequently exacerbated by institutional and legal barriers, particularly in areas such as marriage and name-change regulations.

Table 9 framework matrix of Hungarian respondents' opinion on perception of common people and consequences of such perception.

Occupation		Occupational position	Case ID	Public Perceptions	Perception leading to action	Type of hate crimes	Getting equal access	Overall experience		Additional relevant opinion
Type	Category							Negative	Positive	
Informal	Sex Worker	In-person	21	<i>Legal aid for sex workers facing harassment or discrimination was limited, and many were hesitant to seek help from law enforcement due to fear of further discrimination or arrest...Law enforcement also targets transgender sex workers disproportionately, leading to harassment and arrests.</i>	<i>transgender sex workers face significant barriers to access, and opportunities compared to cisgender individuals.</i>	<i>harassment & arrests.</i>	No	<i>...transgender sex workers face significant barriers to access, and opportunities compared to cisgender individuals ...</i>	---	<i>...transgender sex workers face similar discrimination, including verbal and physical abuse from clients and law enforcement.</i>
			22	<i>enforcement due to fear of further discrimination or arrest...Law enforcement also targets transgender sex workers disproportionately, leading to harassment and arrests.</i>	<i>Discrimination and stigma make it difficult for transgender sex workers to access support services, earn a fair income, and work safely.</i>	<i>...verbal and physical abuse...</i>	No	<i>...situation that requires urgent action to address the systemic inequalities faced by marginalized workers. balancing advocacy work with self-care and managing societal discrimination</i>	---	<i>...situation that requires urgent action to address the systemic inequalities faced by marginalized workers. balancing advocacy work with self-care and managing societal discrimination</i>
Formal	Full time	Social Media Manager	16	<i>...occasionally face microaggressions and insensitivity from coworkers. For example, some use incorrect pronouns or make inappropriate comments about my gender identity.</i>	<i>... being excluded from social activities or not being taken seriously in meetings. There's also the fear of being passed over for promotions due to prejudice.</i>	<i>Microaggression</i>	No	<i>It's disheartening to experience prejudice in various aspects of life.</i>	---	---
		Sales/retail Associate	17	<i>It's a constant reminder that I'm not accepted in this community. ... The discrimination I face was deeply ingrained in this community's attitudes towards transgender individuals.</i>	<i>Some employers made derogatory comments about my gender identity, while others simply ignored my applications after learning I was transgender... I've been called slurs, denied service, and even physically threatened.</i>	<i>Unfair treatment, verbal and physical assault</i>	No	<i>Equal participation I face daily harassment from coworkers and customers... face creates barriers to advancement and fair treatment.</i>	---	<i>It's a constant struggle just to exist and make a living.</i>

	3	<i>...misgendering by customers and colleagues...</i>	<i>bias in hiring, limited promotion opportunities, and exclusion from professional networks.</i>	<i>Microaggression</i>	<i>No</i>	<i>occasionally hearing derogatory remarks.</i>	<i>The store management seemed relatively open-minded during the hiring process.</i>	<i>The experience of a transgender person in Hungary's labor market was challenging due to systemic biases and restrictive laws.</i>
	18	<i>The lack of support and justice after experiencing harassment forced me to leave my job and affected my mental health.</i>	<i>I had to leave my job due to a traumatic experience...It's a stark reminder of the challenges transgender individuals face in the workplace.</i>	<i>Harassment</i>	<i>No</i>	<i>...experienced sexual harassment and discrimination based on my transgender identity.</i>	<i>---</i>	<i>...witnessed discrimination against other transgender individuals in various settings, including the workplace.</i>
<i>Assembly line worker</i>	10	<i>They call me a fag... They laughed at them, mocked them, or even physically abused them.</i>	<i>I can't know fully because I am constantly restricted due to my gender identity. There was always someone who was bothered by it.</i>	<i>Bullying and teasing</i>	<i>No</i>	<i>Unfair treatment I was not hired for a job, not served in a shop, etc.</i>	<i>---</i>	<i>---</i>
<i>Freelancer Graphic designer</i>	15	<i>It was difficult to find long-term clients who respect my gender identity...There was also a lack of respect and recognition for my professional skills.</i>	<i>...job refusals, workplace harassment, lack of career progression, and social exclusion in professional settings...</i>	<i>Mistrust</i>	<i>No</i>	<i>... the lack of proper gender recognition impacts my ability to build professional relationships and credibility.</i>	<i>--</i>	<i>I've been refused work, underpaid, and sometimes outright ignored by clients who learn about my gender identity.</i>
	1	<i>Transgenders were not natural...</i>	<i>...high rates of violence and harassment, both in public spaces and within their own communities...</i>	<i>Harassment</i>	<i>No</i>	<i>Freedom of participation ...discrimination against transgender individuals in various settings, including healthcare facilities, workplaces, and educational institutions.</i>	<i>--</i>	<i>... my qualifications and dedication to the cause ultimately helped me overcome these challenges</i>
<i>NGO Worker</i>	19	<i>Some organizations were hesitant to hire a transgender person due to concerns about public perception and internal biases.</i>	<i>... the personal emotional toll of working in a field that was constantly confronting injustice.</i>	<i>Systemic biases</i>	<i>No</i>	<i>Prejudices and systemic biases create barriers that make it harder for us to achieve the same level of professional success and recognition.</i>	<i>Legal aids include human rights organizations that offer legal advice and representation</i>	<i>I face ongoing challenges such as securing funding for our programs and dealing with societal prejudices.</i>

Customer Service Representative	20	<i>There's also a general lack of respect and understanding from some coworkers and management.</i>	<i>... feel unsafe due to the lack of security measures.</i>	<i>Bias & prejudice</i>	<i>No</i>	<i>... challenges, including being relegated to undesirable shifts or tasks and feeling unsafe in the workplace.</i>	<i>---</i>	<i>... I don't believe I have the same access or opportunities as cisgender individuals.</i>
Software Developer	11	<i>... misgendering, exclusion from social events, and inappropriate questions about my gender transition....</i>	<i>...face overt job refusals, lack of career advancement opportunities, and sometimes even bullying at the workplace.</i>	<i>Bias and microaggression</i>	<i>No</i>	<i>I deal with occasional microaggressions and a lack of respect from certain team members.</i>		<i>I do not have the same access. Bias in hiring, limited promotion opportunities, and exclusion from professional networks due to my gender identity were significant barriers.</i>
Administrative Assistant	2	<i>I've experienced misgendering, exclusion from team-building activities, and occasional derogatory remarks about my gender identity... There's also a lack of understanding and support for transgender issues among my colleagues...</i>	<i>...employers were hesitant to hire a transgender person, questioning my capabilities and fit for their company culture.</i>	<i>Mistrust & misbehave</i>	<i>No</i>	<i>At my current job, I occasionally face subtle discrimination and exclusion from social activities.</i>		<i>...have faced blatant refusal of job opportunities, lack of promotions despite qualifications, and hostile work environments</i>
Software QA Manager	4	<i>Such people were generally not the most empathetic, and they won't change their stance... others do not think trans people should exist, ...</i>	<i>Discrimination faces, ...Mainly the daily frictions, small comments, deadnaming, etc., not from the management... in shops, on the street, in other social situations, condescending treatment, staring, etc.</i>	<i>Stereotyping</i>	<i>No</i>	<i>...during the interview phase, it's less likely that trans and non-binary people get hired.</i>		<i>Discrimination mostly appears when searching for a new job and naturally in marriage and name change laws.</i>
Warehouse worker	5	<i>Employers find it uncomfortable and say that trans people require a lot of attention to detail.</i>	<i>Many do not even call me for job interviews because I do not look like a woman as stated in my ID</i>	<i>Prejudice & bias</i>		<i>I have only been working part-time so far.</i>		<i>Mainly due to not looking like a woman as stated in my ID. Unfortunately, after the 2020 paragraph 33, I can no longer change my gender.</i>

	Restaurant worker	6	<i>I feel that everyone was accepting.</i>	<i>I just simply do my job.</i>	---	Yes	---	<i>I don't notice any discrimination;</i>	<i>Where I work, it doesn't matter.</i>
	Medical secretary	9	---	---	Harassment	Yes	Sexual identity	---	---
	Part-time Trade, creative work, civil organization	7	<i>Misgendering, invalidation, humiliation, and discrimination along these lines.</i>	---	Microaggression	No	<i>Indirectly. During private conversations</i>	<i>I have always had a job.</i>	---
	Junior manager	8	<i>Not much at this one, but some people can distance themselves from you after getting "the news" about it.</i>	<i>I've experienced verbal and physical aggression, exclusion, discrimination, and bullying.</i>	Microaggression	No	<i>it's sometimes quite uncomfortable to hear all the gay jokes.</i>	<i>...the music industry was quite open about this shape of human beings...</i>	<i>...my employer was really flexible with it, so I'm all good.</i>
Unemployed Unemployed		12	<i>Personally, it affects my relationships and social interactions as people often do not understand or accept my identity.</i>	<i>The stigma and bias against transgender individuals make it extremely difficult to even get a foot in the door.</i>	Stigma and Bias	No	<i>I've experienced being dismissed outright in interviews, receiving fewer callbacks, and facing intrusive and inappropriate questions about my personal life.</i>	<i>Other transgender people I know have faced similar issues: outright job refusals, harassment in the workplace, and being passed over for promotions.</i>	

		13, 14	<p><i>My gender identity creates significant barriers that cisgender individuals do not face, impacting my chances of being hired and accepted in the workplace.</i></p>	<p><i>Most employers seem to lose interest or become uncomfortable once they find out about my gender identity during the interview process.</i></p> <p><i>For example...during interviews and being asked invasive personal questions that were not relevant to my professional abilities.</i> [Case 13]</p>	<p><i>Stigma and Bias</i></p>	<p><i>No</i></p>	<p><i>The main challenge was securing a job. I face significant bias and a lack of understanding from potential employers, which makes the job search process very difficult.</i></p>	<p><i>---</i></p>	<p><i>Yes, I have seen friends and acquaintances being discriminated against in similar ways, including job rejections, workplace harassment, and social exclusion.</i></p>
Retired	Former Senior High School Teacher	23	<p><i>I faced workplace discrimination in the form of exclusion from certain activities and promotions. Now, I face systemic discrimination in the pension system and public services...It has impacted my relationships, career advancement, and now my financial stability in retirement.</i></p>	<p><i>The pension system and employment opportunities for transgender individuals were fraught with barriers and inequities compared to those for cisgender individuals.</i></p>	<p><i>Social ostracism</i></p>	<p><i>No</i></p>	<p><i>The pension system and employment opportunities for transgender individuals were fraught with barriers and inequities compared to those for cisgender individuals.</i></p>	<p><i>---</i></p>	<p><i>Yes, my gender identity has been a significant factor in the discrimination I've faced both personally and professionally.</i></p>

(Source: Author produces, 2024)

The need for comprehensive legal protections and institutional reforms to ensure that transgender employees are recognized and respected for their talents, regardless of their gender identity, is further demonstrated by the institutionalized discrimination in these areas, which reinforces the societal biases that transgender individuals face in all aspects of their lives, including their professional lives.

In a similar vein, warehouse laborers (Case 5) have been subjected to blatant discrimination due to their gender identity, with a significant number of them being denied employment interviews. This situation is indicative of the broader distress and prejudice that the general population harbors toward transgender individuals. The rejection of interviews solely on the basis of gender identity underscores the profound influence of ingrained biases on even the most fundamental employment processes, rendering it exceedingly challenging for transgender individuals to enter specific sectors, despite their qualifications. This form of indirect discrimination and exclusion is not restricted to particular industries; rather, it is prevalent in a variety of sectors. For example, medical secretaries (Case 9) and employees in commerce, the arts, or civil society organizations (Case 7) have reported encountering harassment and discrimination in their respective positions. Transgender employees are further marginalized by this nuanced, yet persistent, prejudice, which frequently goes undetected or unchecked in everyday interactions.

While certain industries, such as the music industry, have become relatively more tolerant of transgender individuals, other disciplines, such as management, continue to present significant barriers. This is an intriguing phenomenon. For instance, junior managers (Case 8) have encountered physical antagonism, exclusion from significant workplace activities, intimidation, and verbal hostility in addition to verbal hostility. Transgender employees are unable to thrive and advance in their careers as a result of the constant dread and stress that these workplace harassment experiences generate. The workplace is still influenced by profoundly ingrained societal attitudes, as evidenced by the hostility they encounter, despite legal safeguards against such behavior. The daily struggle for transgender individuals to secure employment without fear of harassment persists, particularly when their gender identity is scrutinized and stigmatized by both colleagues and clients.

An even more grievous set of challenges is encountered by transgender individuals who lack formal employment (Cases 12, 13, and 14). The additional humiliation and hostility that individuals who are already marginalized from the workforce experience while endeavoring to secure employment substantially complicates their ability to secure stable employment. Many respondents in this category reported that they were subjected to intrusive personal questions

during interviews, such as inquiries into their gender identity or private life. These questions are not only inappropriate but also further degrade their dignity. In addition, these individuals have frequently been rejected for employment without any explanation, resulting in a cycle of exclusion. The social acceptability challenges that transgender individuals encounter are further exacerbated by this persistent discrimination, which makes it more difficult for them to secure meaningful employment or reintegrate into the workforce. The persistent prejudice that these individuals face is a significant impediment to their ability to overcome economic hardship and establish a sense of stability or career advancement.

In a parallel circulation, transgender individuals who are either in the process of retiring or have already retired (Case 23) have faced distinctive obstacles, including substantial impediments to job advancement, financial security, and retirement-related benefits. The systemic discrimination that retired transgender individuals encounter in the public sector and pension systems is a clear reflection of societal prejudice that extends throughout an individual's career. The lack of adequate legal protection or inclusive policies in place to safeguard their rights has exacerbated the economic insecurity that many have experienced in retirement as a result of their lifetime of discrimination. This illustrates that discrimination against transgender individuals is not limited to their working years; it also has enduring repercussions for their post-retirement years, rendering them vulnerable in their later years. The necessity of legal and policy reforms that transcend workplace concerns to address the broader societal inequalities that impact transgender individuals throughout their lives is underscored by the inequities experienced by retired transgender individuals.

In summary, the data unequivocally demonstrates the widespread nature of discrimination against transgender individuals in Hungary, which is profoundly entrenched in cultural prejudices and unfavorable public attitudes. These discriminatory practices not only impede the employment opportunities of transgender individuals but also restrict their access to social services, healthcare, and financial security. The results underscore the pressing necessity for more robust legal action to resolve these pervasive issues, thereby guaranteeing that transgender individuals are not discriminated against in any aspect of their lives. To cultivate a more inclusive and equitable society, it is imperative to broaden the legal frameworks that safeguard the rights of transgender individuals, more effectively enforce these protections, and encourage a cultural transformation toward greater acceptance and equality.

5.2.2 *Public perception about transgender and its consequences- Bangladesh chapter*

The information in Table 10 sheds insight on respondents' opinions on how transgender people are treated, particularly when it comes to interactions with the workplace and society at large. According to the interviewees, there have been serious unfavorable opinions and discriminatory acts in the informal sector. For example, common people have compared *Hijra* leaders like Guru Ma (Case 1 and Case 17) to animals and have subjected them to severe taunting and torment. This notion has resulted in violent conduct from the general population, including harassment by youngsters. Hate crimes including sexual assault and serious physical abuse were examples of how discrimination has evolved to its form, with victims facing poor medical care and little legal protection. Due to their lack of acknowledgment and equitable treatment in society, *Hijra* people have often been characterized by social isolation and a lack of professional prospects.

Disciples in the *Hijra* community have reported similar experiences of being regarded as beggars and encountering anxiety and wrath from the public (Cases 3, 4, 5, 7, 9). The profoundly ingrained structural and sociocultural obstacles that these individuals face are exposed by the consistent sharing of stories of physical abuse, degradation, and the lack of accessible social assistance. For example, one disciple (Case 5) described the inadequate treatment they endured at a government hospital, which included the constant apprehension of additional maltreatment and the disregard of medical personnel. The pervasive lack of legal protection and support was underscored by their anxiety, which was further exacerbated by their apprehensions regarding their safety if they reported the assault to authorities. This apprehension of retribution is a prevalent theme among *Hijra* individuals, who frequently endure severe repercussions—including assaults and inadequate medical care—as a result of their gender identity. The physical and emotional toll that discrimination in Bangladesh inflicts on transgender individuals is underscored by these testimonies, underscoring the pressing necessity for comprehensive policy reforms and legal frameworks that provide robust protection from abuse.

Particularly among transgender sex workers, verbal harassment and objectification have been prevalent. These people have been subjected to severe treatment, not only from the public but also in their capacity to participate in social activities. Discriminatory remarks and exclusion from social spaces have been reported in Cases 10 and 11, which have restricted their ability to completely participate in societal and professional opportunities and restricted their freedom of movement. For instance, because of their gender identification, one respondent (Case 11) was denied the opportunity to serve as a main dancer for an event, despite having

completed a week-long practice. The pervasive societal stigma and prejudice that continue to prevent transgender individuals from accessing the same opportunities as others are underscored by this denial, which is based on their transgender status. This exclusion is not limited to professional environments; it also impacts personal affairs and public visibility, thereby perpetuating the cycle of social and economic marginalization.

Conversely, transgender individuals employed in formal industries, including event planning and contact centers, have generally reported more favorable experiences. In Case 12, for example, the recruiting process was described as standard, with equal pay and job stability. However, even in these relatively supportive work environments, transgender employees still experience underlying dread and insecurity. The precariousness of their acceptance within their workplaces is underscored by the fear of coming out and potentially losing their jobs, despite their generally positive work experiences.

As the case of the “half-ladies” in Case 12 illustrates, there is an ongoing struggle with the threat of job loss due to societal biases that may emerge once their gender identity is known. Transgender employees are often aware that their inclusion is temporary, as the dynamic nature of workplace acceptance means that one wrong step or lack of understanding can jeopardize their professional standing. This creates an environment of anxiety and uncertainty about their long-term position in the workforce, despite legal protections or formal inclusion. Transgender employees in these sectors, while not facing the overt hostility seen in other industries, still live under a cloud of uncertainty regarding their ability to continue in their roles without fear of backlash.

In contrast, freelancers and small business proprietors have experienced a more mixed experience of acceptance and prejudice. In Cases 13, 19, and 20, some transgender individuals report familial support and equal access to opportunities, while others face public abuse and discrimination, particularly in their professional lives. The experiences of freelancers, as shown in Case 19, underscore the significant role that family support plays in shaping the professional lives of transgender individuals. While some family members are supportive and nurturing, providing a foundation for success, others are unable to shield them from the prejudice they face in society, including bullying and public ridicule.

This is especially evident in the experiences of transgender freelancers who navigate a society rife with negative perceptions about their identity. They face not only social exclusion but also difficulties accessing common spaces such as shopping malls or public areas without enduring ridicule and harassment, as seen in the case of the small business owner in Case 20. These contrasting experiences highlight the impact of personal circumstances, including family

dynamics, in determining the degree of professional success and societal acceptance that transgender individuals can expect. The discrimination they face often varies dramatically depending on their personal support systems and the societal attitudes in their immediate environment, making their experiences in the professional world highly inconsistent.

Moreover, transgender individuals seeking employment in the non-profit sector, as confirmed by NGO employees and job seekers, have encountered significant challenges. Case 14 illustrates this clearly: despite identifying as male, the individual was subjected to discrimination and abuse by colleagues, a reflection of the societal biases that permeate even seemingly progressive industries. The challenges encountered by transgender individuals, regardless of their qualifications or the nature of their work, point to more pervasive societal obstacles that extend beyond the workplace. In many instances, such as in Case 14, discrimination occurs even when the transgender individual's professional experience and abilities are not in question. The focus on gender identity can overshadow the qualifications that would otherwise make them a strong candidate.

Additionally, transgender individuals often report being denied access to social services or experiencing inferior treatment, as seen in the experiences of individuals in informal occupations, such as those in *Hijra* communities (Cases 1, 3, and 17). The general lack of respect for transgender individuals and the limited access they have to essential services exacerbates their marginalization. Table 10 illustrates that transgender individuals in Bangladesh face considerable obstacles in accessing both social services and equal opportunities across various sectors. The consistent reports of prejudice, abuse, and unequal treatment highlight the need for systemic change—one that includes a comprehensive legal framework, improved societal education, and cultural awareness. Only through these efforts can society begin to foster a truly inclusive environment where transgender individuals are granted the same opportunities and privileges as their cisgender peers.

As shown in the data, the experiences of transgender individuals in Bangladesh are shaped by a range of complex factors, including occupation, societal attitudes, and personal circumstances. For instance, transgender individuals working in the informal sector, like the *Hijra* community (Cases 1, 3, 17), face extreme prejudice, bullying, and a lack of professional opportunities, making it difficult for them to secure stable livelihoods. The discrimination they face is often so severe that it results in physical assault and exclusion from public spaces, highlighting the dangers transgender individuals face daily. Many *Hijras* report living in isolation, cut off from both their communities and society at large. Similarly, those working in small businesses or self-employment, like freelancers and entrepreneurs (Cases 13, 19, 20),

often report discrimination based on their gender identity but also note the support they receive from family members, which helps mitigate some of the challenges they face. However, these individuals are not immune to the societal biases that permeate public spaces, as evidenced by cases of bullying and teasing when they engage with the public or attend social events.

For transgender individuals seeking employment in the formal sector, including those in roles like call centers (Case 12), the experience is more complex. They report being treated with relative respect and even receiving equal pay, but underlying anxieties persist. Many individuals fear that their gender identity, once revealed, will result in exclusion or job loss, as seen in the “half-ladies” report from Case 12. Despite legal protections, the persistent threat of social rejection and discrimination makes it difficult for transgender individuals to feel truly secure in their professional lives. The constant tension between maintaining their job and being true to their gender identity underscores the fragile nature of inclusion in formal work environments.

In conclusion, the experiences of transgender individuals in the workforce, whether in informal, formal, or freelance sectors, highlight a critical need for structural change. While some transgender individuals report more positive experiences in certain industries, the overarching theme is one of fear, insecurity, and inequality. There is an urgent need for a more inclusive society where transgender individuals are not only accepted in their workplaces but also have access to the same opportunities, respect, and protections as their cisgender counterparts. Only by addressing these deep-seated biases can we hope to create a world where transgender individuals can live and work freely without fear of discrimination, prejudice, or violence.

Table 10 framework matrix of Bangladesh respondents' opinion on perception of common people and consequences of such perception.

Type	Category	Occupation	Occupational position	Case references	Public Perceptions	Perception leading to action	Type of hate crimes	Getting equal access	Overall experience		Additional relevant opinion
									Negative	Positive	
Informal	Hijra Giri		Leader [Guru ma]	1, 17	For common people Hijra's were like an animal... People don't like us.	We should not exist in this world..	Bulling, teasing on the road	No	Now people were becoming so aggressive to us. Even a child used to tease us when we used to walk. Nobody likes us.	---	There was no professional life for us...
				6	...people afraid of us and treat as an alien	---	---	No	live alone	---	If I were not a Hijra then I can live like you
				3, 4, 7, 9	People don't like us	People don't like to give us money...They treated us as a beggar...People afraid us	Hate us	No	We don't have any access of social services.	---	One day I was coming from the Sadar [the nearby city] and saw "Suchona" were bitten by some people near the school. I have informed our Guruma and went to search for the boys and it was a big clash between the bazar committee.
			Disciple [Chela]	5	Vaia [brother] no one want to hear about me and my suffering. Everyone think I am enjoying my work. What else I can do?	In the government hospital, I was not treated well. I thought about compelling to the police but what can I tell them, there was not law can protect a prostitute. And my guru ma also didn't allow me to do that. Ze were right if I go to police and make a case against of that guy then there were a life threatening for me.	Sexual assault	---	Equal treatment No recognition No social status [even in the community]	---	One local political chairman's son has broken my hand and burn my ass with candle. ze wanted to cut my penis, I was screaming, crying and become unconscious ze though I have died and through me in a paddy field. Some farmers have found me and informed our community, and they took me to the government hospital. In the government hospital, I was not treated well. Then my Guru ma took me to private hospital. This happens during the Covid-19 pandemic...Though after few days later the political leader has given us some money and repaired our residence. I was instructed not to go outside. During pee, still I can feel pain.

		15	<i>...People don't show us any respect and afraid of us.</i>	<i>every time when people saw us, they afraid of us and treat as an alien</i>	<i>We generally live alone</i>	<i>No</i>	<i>not to let us enter in public gathering or celebration</i>	---	---
		16	<i>No comment</i>	<i>No comments</i>	---	---	<i>No idea</i>	---	---
		18	<i>We live like an insect</i>	<i>No social life</i>	<i>No one want to spend time with us</i>	<i>No</i>	<i>Dishonor and disrespect</i>	---	<i>If I were not a Hijra then I can have a family like others and live a normal life.</i>
		10,	<i>...not boy not girl...</i>	<i>People look weirdly. Don't like to engage us in their common activities ...</i>	<i>Maximum verbal like- "chya", "chokka"</i>	<i>I don't think so...</i>	<i>Freedom of movement</i> <i>I was going to shopping- when I was passing that building some boys said that see hir ass were so big, I think we will get so fun by fucking hir ...</i>	---	<i>People pass comments about my body language ...</i>
		11	<i>...common people don't want to allow...</i>	<i>Viewed as kidnapper.</i> <i>When I was a kid, my mother used to tell me if I don't eat then ze will call a Hijra and Hijra will take me with them [like kidnap]. See this was how the children being socialized in our country.</i>	<i>Because I have a makeover like female. They didn't allow me as a female dancer.</i>	<i>No</i>	<i>Equal participation</i>	---	<i>I suppose to be lead dancer and I have done a week-long rehearsal and made my team strong dancer but during the day, they allowed all the team member except me.</i>
Formal	Call center job	12	<i>half-ladies</i>	<i>I don't think if my boss knows about my identity then they will through me out...Since my body language looks like female so some notice and some don't notice...</i>	<i>Bulling</i>	<i>Yes,</i>	<i>Job security</i>	<i>...now our salary was same.</i>	<i>I am having all kind of facility and leading a prestigious position in this society.</i>

Event management	Senior executive	21	---	<i>My recruitment happens in normal ways...</i>	---	No	No idea	---	---
Freelancer	Self employed	13	<i>My parents were good and caring.</i>	---	No idea	Yes	No idea	<i>My family take care of me.</i>	<i>Actually, I barely meet with other transgenders so, I have no idea.</i>
		19	<i>people have lot of negative perception and prejudices about Hijras</i>	<i>...so I think due to sexual identity Hijra's were facing discrimination</i>	<i>Bulling and teasing</i>	<i>Yes.</i> <i>[Only in TV and YouTube]</i>	<i>Discrimination</i>	<i>Now I am getting similar access to other binary people.</i>	<i>My parents treat me as a female, and they accepted my gender transformation.</i>
Small Business/ Entrepreneur	Owner	8	<i>They mixed up us with Hijra and used to believed that I also going to their mall to beg money.</i>	<i>Sometimes, some supermalls were not welcoming to us.</i>	---	---	<i>Unfair & Unequal treatment</i>	---	---
		20	---	<i>Due to my body language I use to suffer from bulling on road, shopping mall and all other public places</i>	<i>Bulling & teasing</i>	No	<i>Freedom of expression was the common thing that I am feeling everyday...</i>	<i>Since my family help me so I don't get any challenge but...</i>	
		23	---	<i>...not to take part in common activities.</i>	<i>Bullyng & Teasing</i>	Yes	<i>...freedom of movement was challenging...</i>		
NGO worker	area manager	14	<i>As I am holding male identity, so I don't have much problem...</i>	---	<i>Bullyng</i>	Yes	---	<i>...my salary was nondiscriminatory...</i>	---
Part-time	--	--							

Unemployed	Actively seeking job	2	<i>Many people hold misconceptions about transgender individuals, leading to discrimination and marginalization.</i>	<i>Discrimination and societal biases often limit the opportunities available to transgender individuals, making it more challenging to secure employment</i>	<i>societal biases</i>	<i>No</i>	<i>... facing limited opportunities compared to cisgender individuals</i>	<i>---</i>	<i>I have witnessed discrimination against other transgender individuals, both personally and in professional settings.</i>
		22	No comments	No comments			<i>This discrimination often manifests in the form of exclusion, harassment, and unequal treatment...</i>	<i>---</i>	<i>This includes being treated differently based on my gender identity and facing limited opportunities compared to cisgender individuals.</i>

(Source: Author produces, 2024)

5.2.3 Perception of transgender people of the legislative movements

Understanding the perception of transgender people’s opinion on different legislative occasion, Table 11 presents the respondents’ perspectives from Hungary and Bangladesh about the influence of national legislative systems on transgender workers in the workplace. The employment sector in both Hungary and Bangladesh has seen notable obstacles, as reported by 33.67% of respondents from Hungary and 49.71% from Bangladesh, respectively. According to this, transgender people have had a significant amount of difficulty finding and keeping jobs in both countries, with Bangladesh having a little higher rate. These difficulties point to a perhaps less accepting and friendly work climate for transgender employees in Bangladesh as opposed to Hungary.

Table 11 respondents’ perceptions on different consequences of the national legislative system.

Codes	Code supporting texts counts from Hungary	Code supporting texts counts from Bangladesh
Challenges face in employment sector	40 (33.67%)	41 (49.71%)
Awareness of Legislative Movements	11 (8.77%)	7 (8%)
Discrimination based on sexual identity	44 (29.88%)	30 (23.71%)
Witnessing others being discriminated	39 (27.68%)	32 (18.57%)

(Source: Author Produces, 2024)

Subsequently, a low level of knowledge has been reported on legislative developments in both nations, including 8.77% of respondents from Hungary and 8% from Bangladesh indicating awareness. This poor knowledge level indicates that the public may not have been aware of or comprehended legislative actions targeted at advancing transgender rights. Insufficient knowledge may affect how well these initiatives promote an inclusive work environment.

In addition, prejudice based on sexual identity has been an actual concern, as reported by 29.88% of respondents from Hungary and 23.71% from Bangladesh. In both nations, transgender people have experienced significant levels of prejudice despite whatever legislation or protections may be in place. They are viewed and treated differently in the workplace because of this ongoing prejudice. Besides, 18.57% of respondents from Bangladesh and 27.68% from Hungary reported having witnessed instances of discrimination against others. The prevalence of prejudice has fueled a climate of fear and shame, which has further impacted how transgender people perceive and are treated in the workplace.

In light of all that has been said, the data suggests that the legal frameworks in Hungary and Bangladesh have a significant impact on the way transgender persons are perceived and

treated in the workplace. Given the large number of reported instances of discrimination and challenges in the workplace, it is possible that the policies that are now in place have not been enough in protecting non-binary individuals or fostering an inclusive culture. As a result, it has demonstrated the requirement for more effective legislative measures and awareness campaigns in order to improve the situation in both countries.

The results also emphasize the significance of both legal and cultural factors in the development of transgender individuals' workplace experiences. Despite the importance of legal protections, their effectiveness is substantially determined by the broader societal attitudes and the willingness of employers to fully implement them. Hungary and Bangladesh's relatively low levels of awareness regarding legislative movements indicate that public education and awareness campaigns are required to educate both the general public and employers regarding the legal rights of transgender individuals. Even the most well-intentioned legislative reforms may not achieve their intended outcomes in the absence of increased visibility and comprehension of these laws.

Furthermore, the persistent prevalence of prejudice and discrimination suggests that these laws are not always effectively enforced or internalized by society, despite the fact that both countries have established frameworks to address discrimination. This underscores the necessity of a multifaceted strategy that integrates legal reform, education, advocacy, and active engagement from both governmental and non-governmental sectors to establish a workforce that is genuinely inclusive of transgender individuals.

5.2.4 Comparative Crosstabulation Analysis: Legal System's Impact on Occupation Involvement

According to the comparative crosstabulation (Table 12), there have been notable disparities between transgender people's experiences in Hungary and Bangladesh when comparing the effects of the legal systems on their engagement in the workforce. 74% of the patients in Bangladesh mentioned having difficulties finding work, while a noteworthy 56% thought they had equal access to jobs. Only 61% of the instances, meanwhile, showed evidence of discrimination against others. This suggests that although most transgender people in Bangladesh experienced difficulties finding work, a smaller proportion believed they had equal access or saw prejudice against others. Particular examples, such as Bangladesh case examples 1 and 3, have continuously documented obstacles, equal access, and discriminatory incidents, highlighting the widespread problems in the Bangladeshi setting. In contrast, cases like

Bangladesh Cases 6 and 7 revealed no challenges, discrimination, or equal access, exposing disparities in transgender people’s experiences in various national contexts.

Table 12 Crosstabulation of the comparative presentation of opinion of legal system on occupation involvement.

Case references	Challenges face in employment sector	Opinion on getting equal access in employment sector	Witnessing others being discriminated	Total	Case references	Challenges face in employment sector	Opinion on getting equal access in employment sector	Witnessing others being discriminated	Total
Hungarian Case 1	Yes	No	Yes	2/3 (67%)	Bangladesh Cases1	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 2	Yes	No	Yes	2/3 (67%)	Bangladesh Cases2	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 3	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases3	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 4	Yes	No	Yes	2/3 (67%)	Bangladesh Cases4	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 5	Yes	No	No	1/3 (33%)	Bangladesh Cases5	Yes	No	No	1/3 (33%)
Hungarian Case 6	No	Yes	No	1/3 (33%)	Bangladesh Cases6	No	No	No	0/3 (0%)
Hungarian Case 7	No	Yes	Yes	2/3 (67%)	Bangladesh Cases7	No	No	No	0/3 (0%)
Hungarian Case 8	Yes	No	Yes	2/3 (67%)	Bangladesh Cases8	No	No	No	0/3 (0%)
Hungarian Case 9	No	No	Yes	1/3 (33%)	Bangladesh Cases9	No	No	No	0/3 (0%)
Hungarian Case 10	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases10	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 11	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases11	Yes	No	No	1/3 (33%)
Hungarian Case 12	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases12	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 13	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases13	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 14	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases14	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 15	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases15	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 16	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases16	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 17	Yes	No	Yes	2/3 (67%)	Bangladesh Cases17	Yes	No	Yes	2/3 (67%)
Hungarian Case 18	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases18	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 19	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases19	Yes	Yes	Yes	3/3 (100%)
Hungarian Case 20	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases20	Yes	No	Yes	2/3 (67%)
Hungarian Case 21	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases21	No	No	No	0/3 (0%)
Hungarian Case 22	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases22	No	No	No	0/3 (0%)
Hungarian Case 23	Yes	Yes	Yes	3/3 (100%)	Bangladesh Cases23	Yes	Yes	No	2/3 (67%)
Total	20/23 (87%)	16/23 (70%)	21/23 (91%)	57/69 (83%)	Total	17/23 (74%)	13/23 (56%)	14/23 (61%)	44/69 (64%)

(Source: Author produces, 2024)

Relatively, the situation has been a little bit more stable and encouraging in Hungary. Seventy percent of the patients indicated they had equal access to work possibilities, although a greater number of cases (87%) experienced difficulties in the employment field (Table 12). Remarkably, 91% of Hungarian cases included reports of seeing prejudice against other people. This implies that, in contrast to Bangladesh, transgender people in Hungary perceived more equitable access and discrimination, even if they still encountered significant obstacles. A wider understanding and recognition of the problems experienced by the transgender population can be observed in the persistent reports of difficulties encountered, equal access, and prejudice witnessed by Hungarian Case 3, Case 10, and Case 12. The higher percentages in Hungary, despite these difficulties, suggest a slightly stronger acknowledgment of concerns related to discrimination and equal access, maybe because of a more active legal and social campaigning environment than in Bangladesh.

The critical necessity of interventions that are specifically designed for each country is underscored by these findings. Despite the fact that Hungary's legal framework and social awareness may facilitate the access of transgender individuals to formal employment, the high levels of witnessed prejudice suggest that cultural change is still indispensable. The primary objectives should be to enhance the enforcement of anti-discrimination laws, ensure that transgender individuals feel at ease and secure in reporting instances of harassment or discrimination, and promote inclusive workplace environments. Organizations may also implement public education campaigns and sensitization programs to mitigate residual biases and establish a more encouraging environment for transgender employees.

The circumstance in Bangladesh necessitates a more fundamental approach. Legal recognition of the third gender has granted certain rights; however, the pervasive social stigma and the lack of awareness regarding legal rights present substantial obstacles to full labor market inclusion. Comprehensive legal reforms are required, with a particular emphasis on the enhancement of the enforcement of rights and the eradication of discrimination in the workplace. In addition, there should be a greater allocation of resources to social programs that equip transgender individuals with the necessary skills and resources to pursue formal employment opportunities. To cultivate a more inclusive labor market for transgender individuals in both countries, it is essential to address the cultural and societal factors that contribute to discrimination.

Moreover, developing a friendly atmosphere for transgender persons necessitates a comprehensive strategy that transcends legal measures. Hungary and Bangladesh must promote community involvement and grassroots activity to effectuate genuine, enduring

change. In Hungary, despite increased knowledge and some legal protections, the prevalence of observed discrimination suggests that societal acceptability remains behind legal progress. The transgender community in Hungary would gain from enhanced public advocacy initiatives designed to dismantle misconceptions, promote understanding, and establish safe environments for transgender persons to articulate their experiences.

In Bangladesh, where social stigma is prevalent, treatments should prioritize education and awareness from a young age to confront entrenched preconceptions. Cooperation among governmental entities, non-governmental groups, and the transgender community is crucial to guarantee that policies both safeguard the rights of transgender persons and strive to alter society perceptions. In both Hungary and Bangladesh, fostering an inclusive workforce necessitates ongoing endeavors at legislative and societal levels, emphasizing the recognition of transgender persons as significant contributions across all sectors. True equality for transgender individuals in both nations can only be achieved by confronting both institutional and cultural impediments to inclusion.

5.3 Exploring the Consequences of Different International and National Legal Initiatives on Transgender Labor Status Between Hungary and Bangladesh

In the subsequent section, the reader will glance at the effects of different international and national legislation measures on the work situation of transgender people in Hungary and Bangladesh. This discourse revolves around the viewpoints of participants from each nation concerning the efficacy of the existing legislative movement and their experiences in the workforce. This section explores how legal and policy structures shape the employment experiences of transgender individuals in Bangladesh and Hungary. While this research does not conduct doctrinal legal analysis, it draws from national and international legal frameworks to assess how respondents perceive, interpret, and are affected by these laws in practice. A comparative study will draw attention to the parallels and discrepancies in legal understanding, discriminatory situations encountered, and the proactive steps transgender people have taken against discrimination at work. These insights are intended to provide a comprehensive understanding of the potential and obstacles to achieving transgender rights in various legal and cultural contexts by shedding light on the intricacies of legal frameworks and their practical ramifications.

5.3.1 *Perception on Legal Protections and Employment Experiences- Hungary chapter*

In accordance with the study's objective 3, categorized by their occupation and occupational position, the framework matrix (Table 13) provides an analytical examination of the opinions expressed by Hungarian respondents regarding legal safeguards and their employment experiences. The study presented here illustrates the diverse range of perspectives, experiences, and information that transgender people in Hungary have toward the legal system.

The unlawful nature of sex work and the widespread prejudice against transgender people have brought to light serious issues for sex workers. Case 21 pertains to a sex worker who has expressed a desire to seek help from advocacy groups. However, the worker was unaware of the precise measures the ILO took to tackle their concerns. In addition to facing significant obstacles to justice, this respondent encountered stigma and prejudice while attempting to get banking, housing, and healthcare services. While they were aware of their rights, another sex worker (Case 22) stated that they felt they were mainly ineffectual in the setting of sex work, where legal safeguards frequently exclude or insufficiently meet their needs.

Individuals who are employed have exhibited an unequal understanding of their legal rights and protections, which is indicative of both systemic barriers to effective enforcement and gaps in societal understanding. While there are legal protections against discrimination based on gender identity, their practical application continues to be a challenge. For instance, a social media manager (Case 16) disclosed that, despite their awareness of their rights, they encountered substantial challenges in regards to equality in the workplace. They encountered challenges associated with gender identity in the workplace, which prompted them to seek assistance from advocacy organizations and the Directorate-General for Equal Treatment⁹. This response emphasizes the discrepancy between the legal frameworks intended to safeguard transgender individuals and the lived experiences of discrimination that endure as a result of inconsistent application of the law and feeble enforcement.

Similar concerns were expressed by a sales/retail associate (Case 17), who observed that the conservative neighborhood in which they worked generated an environment in which social support and legal aid were challenging to obtain, thereby eroding their confidence in the judicial system. The absence of support within their community serves as a reminder of the

⁹ The Equal Treatment Authority (ETA) was dissolved in 2021. Its functions are now carried out by the Directorate-General for Equal Treatment under the Office of the Commissioner for Fundamental Rights, in line with Act CXXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities.

way in which legal deficiencies and deeply ingrained cultural attitudes frequently combine to create obstacles for transgender individuals. One respondent (Case 3) observed that the increasing influence of global activism has served as a significant source of hope and solidarity, despite the presence of systemic prejudices and a lack of accessible legal resources. Nevertheless, progress is still impeded by restrictive national laws, particularly in the context of legal gender transitions, which adds an extra layer of complexity for transgender individuals in Hungary.

Freelancers and other professionals have also expressed concerns that are similar to those of their formally employed counterparts. For instance, a graphic designer (Case 15) comprehended the fundamentals of their legal rights; however, they encountered difficulty in obtaining precise information regarding how to address workplace obstacles associated with their gender identity. The challenges they encountered, particularly in terms of accessing essential services and starting a family, were further exacerbated by this dearth of information. The broader issue of insufficient resources for transgender individuals is reflected in their struggles, despite the existence of anti-discrimination laws. An NGO worker (Case 1) who worked in the sector that advocates for transgender rights identified the significant voids in legal protection, identifying budgetary constraints and a lack of resources as the primary obstacles to enforcing existing laws. Although global activism for transgender rights has made progress, the respondent noted that these international movements had minimal influence on their immediate circumstances. This further emphasizes the disconnect between global advocacy and local realities, where entrenched systems of discrimination frequently resist change despite international pressure for reform.

In spite of their increased awareness of their rights, individuals employed in sectors such as software development and customer service continue to encounter persistent challenges. Despite being cognizant of the legal safeguards in place, a customer care agent (Case 20) expressed frustration regarding the absence of genuine protection. They encountered substantial obstacles in the workplace, including unequal treatment and adverse duty assignments, which resulted in job disenchantment and feelings of isolation. This highlights the widespread problem of workplace cultures that fail to provide meaningful inclusivity, despite the existence of legal frameworks. In the same vein, a software engineer (Case 11) expressed concern regarding Hungary's stringent regulations, which substantially limit personal freedoms by prohibiting legal gender identification. The daily work experiences of transgender employees are impacted by these stringent regulations, which not only impede their ability to legally transition but also create uncertainties about their professional

capabilities, social isolation, and discomfort. Their struggles are further exacerbated by the absence of government support, as these workers perceive that the systems that are intended to safeguard them are not providing them with any assistance.

Respondents in the administrative sector have provided comprehensive accounts of the intersection between workplace discrimination and legal recognition. For instance, an administrative assistant (Case 2) was cognizant of their rights and the availability of legal assistance; however, they encountered substantial obstacles when applying for employment. Discrimination based on gender identity was an ongoing impediment, and despite their awareness of their legal rights, they observed no progress in the pursuit of workplace equality. This is notably apparent in the case of a software quality assurance manager (Case 4), who encountered the challenge of using a deceased name on official documents as a result of Hungary's stringent name change laws. This legal documentation issue is a critical juncture at which discrimination can become institutionalized, thereby restricting the ability of transgender individuals to completely engage in society and access employment. In the same vein, a warehouse worker (Case 5) disclosed that they encountered challenges in obtaining interviews, frequently being disregarded as a result of perceived disparities in physical appearance and gender identity. Transgender individuals face significant challenges in obtaining and maintaining employment due to pervasive legal barriers that are further exacerbated by workplace discrimination. These examples serve as a reminder of this situation.

Similar obstacles have been encountered by individuals who are either unemployed or employed part-time, which have been further exacerbated by political propaganda and the inconsistent enforcement of protective regulations. A part-time worker in commerce and creative labor (Case 7) articulated a sense of second-class citizenship that was exacerbated by the disregard for transgender rights in both the public and private sectors. They noted that political narratives frequently perpetuate societal biases, which further complicates the process of navigating the workforce as a transgender individual. A jobless respondent (Case 12) emphasized the challenge of locating information about their rights that was both accessible and comprehensible. They also mentioned that they were subjected to inappropriate interview questions and blatant rejections based solely on their gender identity. The broader trends in employment discrimination are reflected in this, as transgender individuals are frequently denied opportunities despite their qualifications or abilities.

Lastly, pensioners are also affected by these structural issues. Despite being cognizant of their legal rights, a former senior high school teacher (Case 23) perceived them as more theoretical than practical. They encountered challenges in obtaining pension benefits as a result

of inadequately documented gender transformation details. The process of accessing legal assistance was described as time-consuming and burdensome, despite the fact that it was available. This case illustrates the impact of inadequate legal recognition of gender transitions on the ability of individuals to access essential services, such as pensions, even after they have contributed to society through formal work for years.

Thereafter, the systemic failings that exist at the intersection of gender identity and access to social services are indicative of the profound issues that persist in impeding the full societal participation of transgender individuals. Transgender people in Hungary routinely experience severe discrimination, institutional prejudices, and gaps in legal safeguards, the matrix shows, despite differing degrees of knowledge about rights and protections (Table 13). Their stories highlight the need for more cultural acceptance, stronger anti-discrimination legislation, and inclusive policies in order to provide truly egalitarian opportunities for all.

Table 13 framework matrix on Hungarian respondents' opinion on legal protections and employment experiences.

Occupation	Type Category	Occupational position	Case References	Knowledge of Rights	Legal Protection: International & National	Overall experience	Impact of Legal Initiatives	Opinion on legal system
Informal	Sex Worker	In-person	21	<i>The criminalization of sex work and discrimination against transgender individuals create significant barriers to justice...</i>	<i>I've sought support from advocacy groups...I'm familiar with the International Labor Organization, but I'm not aware of any specific steps they've taken to address discrimination against transgender sex workers.</i>	<i>...my gender identity was a significant factor in the discrimination and stigma...</i>	<i>Legal aid for sex workers facing harassment or discrimination was limited,</i>	<i>... transgender individuals face additional challenges due to discrimination and stigma.</i>
			22	<i>I'm aware of some of my rights, but they often feel meaningless in the context of sex work.</i>			<i>I face discrimination from...Accessing healthcare, banking, and housing services was difficult due to discrimination.</i>	<i>Many laws intended to protect labor and civil rights exclude or fail to adequately address the needs of sex workers.</i>
Formal	Full time	Social Media Manager	16	<i>I'm aware of some of my rights as a citizen, including protections against discrimination based on gender identity.</i>	<i>Yes, I'm familiar with the International Labor Organization. While I'm not aware of specific steps they've taken for transgender individuals in Hungary...</i>	<i>In Hungary, ...[law]enforcement can be challenging, and there's still work to be done to ensure full equality.</i>	<i>...there were challenges related to being transgender in the workplace that sometimes make me feel uncomfortable.</i>	<i>There were legal avenues for addressing harassment or discrimination, including filing complaints with the Equal Treatment Authority¹⁰ or seeking assistance from advocacy organizations.</i>
		Sales/retail Associate	17	<i>I'm vaguely aware of some rights, but I don't have much faith in the system to protect me...</i>	<i>Legal aid feels inaccessible to someone in my position, and I don't have the resources to pursue legal action... I'm not familiar with ILO or any steps they may have taken.</i>	<i>I'm not sure what options were available ... social support was limited in this conservative community.</i>	<i>I faced discrimination during the application process.</i>	<i>There's a gap between legal protections and actual enforcement.</i>
			3	<i>...In Hungary, recent laws have made it difficult for transgender individuals to change their legal gender...</i>	<i>International organizations like the UN and European Court of Human Rights advocate for transgender rights and non-discrimination, but national laws were currently restrictive...</i>	<i>...transgender person in Hungary's labor market was challenging due to systemic biases and restrictive laws.</i>	<i>...occasionally hearing derogatory remarks... additional ... barriers such as bias in hiring, limited promotion opportunities, and exclusion from professional networks.</i>	<i>...Legal aids include support from NGOs and LGBTQ+ advocacy groups, although they were often limited in resources and reach. Advocacy and support from international bodies were crucial...</i>

¹⁰ Since 2021, the responsibilities of the former Equal Treatment Authority have been transferred to the Directorate-General for Equal Treatment, operating within the Office of the Commissioner for Fundamental Rights. This unit is now responsible for monitoring and enforcing compliance with Hungary's anti-discrimination framework.

	18	<i>I'm aware of my rights, but it's disheartening to see them violated with no recourse for justice.</i>	<i>I'm familiar with the International Labor Organization ... but I'm not aware of any specific steps they've taken ...</i>	<i>I reported the harassment to HR, ... The company failed to address the harassment, and I felt isolated and unsupported.</i>	<i>I didn't pursue legal action due to fear of retaliation and lack of support.</i>	<i>The system failed to protect me.</i>
Assembly worker	10	<i>I didn't know such rights existed...</i>	<i>I can't know fully because I am constantly restricted due to my gender identity.</i>	<i>They laugh at me, humiliate me, and there have been physical assaults as well.</i>	<i>They don't even give me a chance to show that I have good professional experience because I am transgender.</i>	---
Freelancer Graphic designer	15	<i>I have a basic understanding ...However, accessing detailed and practical information was challenging.</i>	<i>I am aware that some NGOs and advocacy groups..., but accessing specific legal aids ... remains difficult...I am not familiar with ILO...</i>	<i>Due to the lack of proper gender recognition, I cannot access necessary facilities...also affects my ability to form a family...,</i>	<i>.... finding consistent work in a company was challenging without proper gender recognition.</i>	<i>Our laws were not so helpful for us...I am considering moving abroad ...</i>
NGO Worker	1	<i>There were laws and policies at both the national and international levels...including anti-discrimination laws and policies related to gender identity and expression.</i>	<i>I'm familiar with the International Labor Organization (ILO) and their work on labor rights and employment issues. While they haven't taken specific steps...</i>	<i>...my gender identity has undoubtedly influenced the discrimination I've faced,</i>	---	<i>...accessing these resources can be challenging for many transgender individuals due to financial constraints and other barriers...there were still significant gaps in protection.</i>
	19	<i>There were anti-discrimination laws in Hungary and international human rights conventions that aim to protect transgender individuals.</i>	<i>I often attend workshops and seminars to stay informed about legal protections and rights.</i>	<i>The biggest challenge was overcoming bias during the hiring process...</i>	<i>Some organizations were hesitant to hire a transgender person due to concerns about public perception and internal biases...</i>	<i>...We need stronger legal protections and broader societal acceptance to create truly equitable opportunities for everyone.</i>
Customer Service Representative	20	<i>It's frustrating to know I have rights on paper but little practical protection.</i>	<i>I'm familiar with the International Labor Organization, but I'm not aware of any specific steps they've taken to address discrimination against transgender individuals in my country.</i>	<i>I'm often assigned undesirable tasks, like night shifts or heavy workloads, and feel unsafe due to the lack of security measures.</i>	<i>face significant barriers to equality and fair treatment.</i>	<i>Legal recourse feels daunting and inaccessible.</i>
Software Developer	11	<i>.... Hungary's current laws were restrictive and do not allow for legal gender recognition, which limits many rights for transgender individuals.</i>	<i>Internationally, bodies like the European Court of Human Rights provide some protection, but enforcement at the national level remains weak. ...The ILO works for workers development.</i>	<i>...uncomfortable questions about my personal life ...job refusals, lack of career advancement opportunities, and sometimes even bullying at the workplace...</i>	<i>...faced skepticism about my abilities linked to my transgender identity.</i>	<i>Government support was minimal due to current restrictive policies.</i>
Administrative Assistant	2	<i>Yes, I am aware of my rights as a citizen.</i>	<i>...legal aids include filing complaints with the Equal Treatment Authority and seeking assistance from non-governmental organizations that provide legal support for LGBTQ+ issues.</i>	<i>One significant challenge was the bias I faced during interviews.</i>	<i>...improving workplace equality...on transgender employment in Hungary seems limited.</i>	<i>In Hungary, labor laws prohibit discrimination based on gender identity, though enforcement was inconsistent.</i>

	Software QA Manager	4	<i>...I am aware of my worker's rights...</i>	<i>Only about the Hungarian state organizations...I don't know about ILO and their work.</i>	<i>Besides, since official name change was currently not possible, those who use another name must use their deadname on all official documents, contracts, etc.</i>	<i>Discrimination mostly appears when searching for a new job and naturally in marriage and name change laws.</i>	<i>Anti-discrimination laws exist in Hungary too, but companies can often circumvent them with other excuses, and courts usually side with the companies. The high costs, stress, and time expenditure prevent many victims from taking these cases to court.</i>
	Warehouse worker	5	<i>Unfortunately, after the 2020 paragraph 33, I can no longer change my gender.</i>	<i>I didn't know.</i>	<i>Employers find it uncomfortable and say that trans people require a lot of attention to detail.</i>	<i>Many do not even call me for job interviews because I do not look like a woman as stated in my ID.</i>	<i>---</i>
	Restaurant worker	6	<i>...possible legal aids for harassment or discrimination were available...</i>	<i>Know only about "Háttér Society"</i>	<i>I haven't experienced any discrimination.</i>		<i>..., I have not tried to learn about my rights...</i>
	Medical secretary	9	<i>No idea</i>	<i>No idea</i>	<i>No idea</i>	<i>The patient and work environment test me every day.</i>	<i>No idea</i>
Part-time	Trade, creative work, civil organization	7	<i>The basic, universal human rights officially apply to me, but ...</i>	<i>Yes. This was the International Labor Organization, which protects workers' rights from a social and labor perspective.</i>	<i>...the ruling power unlawfully takes these away and treats me as a second-class citizen.</i>	<i>If your papers don't reflect your true identity, your status gets revealed, and because of political propaganda, it becomes difficult to employ a transgender person.</i>	<i>...so even though there were laws that protect us, they were not adhered to or were modified in ways that conflict with the constitution or the rule of law.</i>
	Junior manager	8	<i>Yes, as a law student and ex-student leader, I think I quite know them.</i>	<i>Some of them, yes.</i>	<i>Because of being an LGBTQ+ person, I've experienced verbal and physical aggression, exclusion, discrimination, and bullying.</i>	<i>...there were not many such things as forbidding conversion camps or standing up against hate crimes, even though there's a law act against the previous situation.</i>	
Unemployed	Unemployed	12	<i>I am aware that there were some protections, but the details were unclear to me...</i>	<i>I am aware that there were some NGOs and advocacy groups that offer support, ...No, I do not know about the ILO or their work...</i>	<i>Interviewers often ask inappropriate questions about my gender identity, and some outright reject my applications after learning that I am transgender.</i>	<i>Many employers seem hesitant to hire me once they learn about my gender identity.</i>	<i>I am not fully aware of my rights...I have tried to find information online, but it was often confusing and not very accessible...</i>
		13	<i>In Hungary, laws were restrictive and do not support legal gender recognition ...</i>		<i>... discriminatory attitudes during interviews ... asked invasive personal questions...</i>	<i>...constant rejections based on my gender identity were very discouraging.</i>	<i>It was incredibly frustrating and stressful to be unable to find employment.</i>

		14	<i>On a national level, recent legislative changes have further restricted rights.</i>		<i>...job refusals... lack of career progression, and social exclusion in professional settings</i>	<i>There needs to be more inclusive policies, better enforcement of anti-discrimination laws, ...</i>	
Retired	Former Senior High School Teacher	23	<i>I am aware of my rights...but they often feel theoretical rather than practical....</i>	<i>internationally, organizations like the European Union advocate for better protections, ...but local adherence was spotty...but their influence on my personal situation has been indirect.</i>	<i>After retiring, I faced issues with my pension.</i>	<i>My gender transition was not properly documented in all legal and financial systems, causing delays and reductions in my pension benefits.</i>	<i>There were legal aids and human rights organizations that offer support, but accessing these services can be difficult and often involves lengthy processes.</i>

(Source: Author produces, 2024)

5.3.2 *Perception on Legal Protections and Employment Experiences- Bangladesh chapter*

Following the study objective 3, the framework matrix (Table 14), categorized by occupational position and profession, provides a thorough summary of the perspectives of Bangladeshi respondents about work circumstances and legal safeguards. It draws attention to the many experiences and degrees of consciousness that transgender people have, with an emphasis on how they have been treated by society as a whole, how they engage with the legal system, and their understanding of their rights.

According to *Hijra* leaders (Guru ma), they have expressed a growing sense of disillusionment and ignorance regarding their legal rights and protections, both domestically and internationally. In Case 1, a leader stated that the Social Welfare Ministry had provided training, but it was ultimately ineffective and did not meet their requirements. But the practical realities they encounter remain unaltered, despite the training. A notable concern is the persistent extortion by police officers, who demand payment in exchange for protection, thereby leaving these individuals susceptible to additional maltreatment without recourse.

However, the leaders also observed that society has been hesitant to provide substantial financial assistance, which has exacerbated their difficulties. Case 17 and Case 6 were among the cases in which numerous members of the community conveyed skepticism regarding the likelihood of any legal action resulting in tangible changes. These individuals' skepticism is a result of their extensive experience with systemic neglect and a widespread absence of protective laws. They are of the opinion that the legal system is not intended to genuinely serve their interests, and it has been found to be largely ineffective in resolving the unique requirements of transgender individuals in their community, despite an existing framework. Reinforcing the profound disparity between legal provisions and real-world outcomes for *Hijra* Giri leaders, the conviction that no laws can effectively protect their rights continues to undermine any hope for change.

Disciples (Chela) in the *Hijra* community have expressed comparable sentiments, as they have become increasingly cautious of government assurances of assistance and have not received any tangible legal support. As one respondent (Case 4) observed, they had been informed of prospective government funding for the community, but they had never received any. The state's failure to provide support has further undermined public confidence in government initiatives.

Another disciple (Case 3) disclosed that they had been subjected to harassment by police officers, despite receiving informal support from their Guru Ma. This continuous pattern

of harassment, rather than protection, underscores the ongoing obstacles encountered by transgender individuals, particularly those who are marginalized within their own communities. The pervasive prejudice and the absence of substantive legislation that addresses the lived realities of transgender individuals are poignantly illustrated by the experiences of the disciples (Case 9, Case 7). They remain vulnerable to exploitation and violence as they navigate a hostile environment that disregards their fundamental rights, without legal standing or sufficient support from law enforcement.

Furthermore, transgender sex workers have expressed widespread ignorance regarding their legal rights and civil liberties, which has further exacerbated their precarious status in society. According to a respondent (Case 10), they discontinued their education as a result of the obstacles they encountered in their profession and the discrimination they encountered from society. They expressed their dissatisfaction with the establishment of a third-gender category that fails to properly represent the experiences of transgender individuals, resulting in a significant number of individuals feeling excluded.

Despite its intentions to safeguard transgender individuals, this category frequently fails to consider the complete range of gender identities and experiences, leading to feelings of marginalization within the system that is intended to protect them. An additional respondent (Case 11) acknowledged that they were aware of NGOs that serve their community. However, they expressed doubts about the likelihood of legal protections being enforced, given the broader societal reluctance to comply with the law. The skepticism toward the legal system is indicative of a more general sentiment that, despite the existence of laws, transgender individuals frequently experience a lack of support due to the inconsistent enforcement and the persisting influence of prejudice on both legal and social outcomes.

Those in formal employment, such as call center employees and senior administrators, who encounter a distinct set of challenges, are also inadequately informed about the legal rights which are specific to transgender individuals. Case 12 involves a call center employee who acknowledged the existence of labor tribunals but expressed significant skepticism regarding their efficacy. He observed that these legal avenues were rarely effective in resolving the issues he encountered, particularly abuse and discrimination at work based on gender identity. This sentiment is indicative of a more generalized apprehension among transgender individuals in the workplace: although written legal protections may exist, their implementation is frequently ineffective, delayed, or nonexistent. Although a senior event management executive (Case 21) is cognizant of fundamental rights, they acknowledged that they were not granted any preferential treatment at work as a result of their gender identity. Despite the fact that

transgender individuals are legally protected, the workplace culture has not yet developed to support or accommodate them, resulting in a disadvantage in comparison to their cisgender colleagues.

The challenges that small business proprietors and freelancers have encountered are distinct, particularly in public contexts where their gender identity is more apparent. Case 13's freelancer observed the broader societal challenges that transgender individuals encounter, including social exclusion and prejudice. Conversely, Case 19's freelancer emphasized the critical importance of rights such as "freedom of gender choice and expression." While these rights are essential for transgender individuals to live authentically, they are frequently denied the legal recognition or societal acknowledgment that is necessary for them to succeed professionally.

Significant obstacles, including legal documentation issues and daily abuse, also confront small business proprietors. In Case 8, a small business owner described how their gender expression was in conflict with their National ID, which resulted in complications when they attempted to access services or pursue educational opportunities. The inconsistency between their gender identity and official documents frequently results in additional obstacles in the acquisition of services or the navigation of bureaucratic systems. They are compelled to adhere to outmoded and inaccurate records that do not accurately reflect their true identity. The broader necessity for legal reforms that address both the documentation process and the broader societal biases that continue to impede the success and well-being of transgender business owners and freelancers is demonstrated by these issues.

Additionally, the challenges faced by transgender individuals are further exacerbated by the reluctance of both governmental and societal systems to completely embrace them, particularly in areas such as healthcare and education. The systemic denial of access to essential services is a substantial obstacle, which is the result of outmoded policies, bureaucratic impediments, and societal prejudices. As an illustration, transgender individuals frequently encounter the challenge of having their gender identity acknowledged in official documents. This is illustrated by the challenges faced by small business proprietors (Case 8) whose National IDs do not correspond to their gender identity.

This problem not only restricts their access to essential services but also restricts their opportunities for professional and educational advancement. Despite the legal right to receive healthcare and education, transgender individuals in a variety of sectors report that they are subjected to discrimination in medical settings and educational institutions. For example, the challenges that transgender individuals encounter may be further exacerbated by the fact that

healthcare professionals may not have the necessary training to provide competent care. In the same vein, educational institutions frequently neglect to provide a secure and inclusive atmosphere, which serves to undermine the well-being of transgender students and discourages them from pursuing their objectives. The urgent necessity for comprehensive reforms that acknowledge the diverse requirements of transgender individuals, guaranteeing equal access to healthcare, education, and social services, is underscored by these compounded barriers.

The pervasive social stigma and discrimination that transgender individuals encounter in their daily lives, particularly in public spaces, is another significant concern. Whether in retail settings, public transportation, or social gatherings, transgender individuals are frequently the victims of verbal and physical assault. Many individuals are unable to completely engage in society as a result of the pervasive discrimination that fosters an environment of dread, isolation, and insecurity. The public's dearth of comprehension or education regarding gender diversity is a significant factor contributing to this. The perpetuation of detrimental stereotypes and stigmatization of transgender individuals is further exacerbated by the absence of positive representation and education in mainstream media.

Table 14 framework matrix on Bangladeshi respondents' opinion on legal protections and employment experiences.

Occupation		Occupational position	Case references ¹¹	Knowledge of Rights	Legal Protection: International & National	Overall experience	Impact of Legal Initiatives	Opinion on legal system
Type	Category							
Informal	Leader [Guru ma ¹³]	1	No idea	No idea for international system but said, ...received a training from shomajseba "Social welfare" ministry for 40 days but there was no outcome of it.	The police do support us. We have to give a share to them and if they get any scope then they force us to give money. They call it protection money.	There was no professional life for us. ...unwanted experience ... people were not willing give my Hijra's money.	There was no law to save us.	
		17	I don't think we have any right.				I don't think we have any right... I don't think law can do any change, in this country who obeys the law!	
		6	I don't think we have any specific laws for us...	I know about UNICEF by name but don't know what they do... Informal support We get support from another guru ma.	Being a minority, we don't have any voice at any social platform.	I don't think we have any specific laws for us...but it could be better if there were some laws for us. It was very confusing that how do we get a property ownership. Those among us who were buying any property they buying this property showing their gender identity either as male or female nor a third gender...	I don't remember that we have received any legal support rather if we have been accused by any criminal activities then before the judgement each of people perceive that we were the criminal.	
	Disciple [Chela ¹⁴]	4		No idea but said, I heard that government would give us some money, but I didn't receive any.	We rarely receive legal support	---	No government can change our life.	
		3	No idea	No idea for international system but said about national system, But get some informal support like Guru Ma	There was no one who can support us. No law or police help us. Rather they harass us if they get any scope.	Though I am doing well. But due to being Hijra I am not getting a good opportunity to take part in different national cultural program.	There was no one who can support us.	
		9					No law or police help us. Rather they harass us if they get any scope.	
		7		No idea about any system		About getting payment, I used to get less payment compared to other common people.	I don't think there was any law that can help me.	

¹¹ Case reference represents each case ID.

¹² Hijra Giri is a term for a certain type of vocation, and it refers to those who like mugging and begging while identifying as hijra.

¹³ The Bengali word *Guru ma* means "Mater of mother."

¹⁴ The Bengali word *Chela* means "the working person for Guru ma".

			16	No idea	No idea	---	People don't show us any respect and afraid of us...Our earning were not fixed so that's our key challenge... Lack of family support and family affection was their primary challenge...	I don't think any government care about us...
			15	No idea	No idea	I don't think any government care about us...	...not to let us enter in public gathering or celebration...	
			5	No idea	No idea for international system but said, ...Few months ago some NGO workers have come to us and teach about HIV/AIDS and teaches us about safe sex	---	...physical torture...One local political chairman's son has broken my hand and burn my ass with candle...He wanted to cut my penis, I was screaming, crying and become unconscious...	If I don't work, then how do I live. Training will not bring any food for me.
			18	Food, cloth, education, shelter, medicine...	We don't get enough support from government offices and other....	We don't have any social SafetyNet support	We were like untouchable ... We don't able to join any social activities. No body invite us	No comments
Sex worker	Virtual	10	I don't know what my civil right is! ...	No idea for national and international system but passed comment on, My doctors use to take care as a common people	It was hard to complete my study, I have already dropped one semester and I think another semester will be dropped...	Nothing specific ... Not in this job but in social life...	For sex worker who cwere. . there was no law...But as you know we were there were third gender have introduced but not transgender, but I don't agree with it...	
		11	I have a desire to admit in Dhaka University, I have heard that there was a quota for third gender...	UNICEF used to work for us... I know there were lots of NGOs in Dhaka working for us.	I think laws can protect our right but if the common people don't want to follow then how can you ensure.	In this job we don't face any challenge...But as a dancer I have faced a lot of challenge that I never able to do any stage show and I have been discriminated several times...	Though I don't believe in third gender, but I am thinking to use this identity... I think gender inclusiveness was just a myth.	
Formal	Call center job	Private organization	12	I don't know if there were any legal aid for transgender person.	Yes. I know that this were labor court. If we have any problem with our company only then we can go, there...They protect the labor right. Nothing else. No idea for national system	Because I have been abused by my friends but where can I mention it. You can see the females were not able to get legal support after a rap then who care about us.	...my colleagues [some of them who were abnormal] used to bull me and call me with deadnames like -half-ladies, Hijra...	I don't think if my boss knows about my identity then they will through me out.
	Event manage	Senior executive	21	I know about basic right but not specific right for us.	I know but I don't know that ILO work for us. No idea for national one [but passed some positive comment about police]	---	I don't receive any special treatment due to my gender identity in my job were...	---
	Freelancer	Self employed	13	No, I know only about female right	---	--	...my job was online based so, I don't face any challenge because of my gender identity.	No. and I don't care about it.
			19	Food, cloth, education, shelter and treatment...	International labor Organization who works for labor right.	No, I don't know. In my school we never discuss about it.	Bulling at school was most...participating in common activities...	I think we need another right like "freedom of gender choice and expression" ... I don't think law can do any change.

Small Business/ Entrepreneur	Owner	8	<i>...know that in 2013 there have a third gender identity...</i>	<i>I know about UNDP; I have gotten training from them. UNDP works for those people who left behind. [no idea for international]</i>	<i>See my NID says I am a male, but you can find me as a female. It makes me challenging to go to school and other services.</i>	Freedom of Movement <i>Bulling on the road was the common discrimination I am facing every day</i>	<i>I don't think we have the appropriate right here. I want to go abroad if possible...I think we need some special law that can help us to protect our right. Like if someone bulling us we can call police and get fine or other punishment...</i>
		20	<i>No idea</i>	<i>I don't know</i>	---	<i>Due to my body language I use to suffer from bulling on road, shopping mall and all other public places...</i>	<i>I don't think law can do any change.</i>
		23	<i>Food, cloth, shelter, education, medicine</i>	<i>No idea</i>	---	<i>...freedom of movement was challenging...</i>	--
NGO worker	area manager	14	<i>Know about male right, not as transgender</i>	<i>Yes. International organization who works for labor rights...but no idea for national one</i>	<i>I think as a male I am getting all rights. But if I become a transgender then I don't know what will happen...</i>	<i>It not specific. But sometimes due to my body language and fishy voice, my colleagues used to do backtalks, but they were not able to talk inform of me.</i>	<i>As I am holding male identity, so I don't have much problem...Bullying. Freedom of expression</i>
Par-time	--	--	---	---	---	---	---
Unemployed	Actively seeking job	2	<i>Equal opportunities and fair treatment were fundamental rights that should be extended to all individuals, regardless of gender identity...</i>	<i>While I have heard of the International Labor Organization (ILO)....</i>	<i>I am not knowledgeable about specific laws and policies aimed at protecting the rights of transgender individuals, particularly in terms of labor rights and civil rights.</i>	<i>...treated differently based on my gender identity...</i>	<i>Legal aid for harassment or discrimination may be available through human rights organizations or legal aid clinics.</i>
		22	<i>I am aware of basic human rights... but I am not well-informed about specific rights afforded to transgender individuals in my country</i>	<i>I am not familiar with their specific initiatives aimed at assisting transgender individuals in securing employment.</i>	<i>Legal aid for harassment or discrimination may be available through human rights organizations or legal aid clinics.</i>	<i>Many people hold misconceptions about transgender individuals, leading to discrimination and marginalization exclusion, harassment, and unequal treatment.</i>	<i>I am not knowledgeable about specific laws and policies aimed at protecting the rights of transgender individuals, particularly in terms of labor rights and civil rights.</i>

(Source: Author produces, 2024)

Consequently, a significant number of transgender individuals are compelled to conceal their identities or modify their behavior in public in order to prevent confrontation or violence. Transgender individuals are also discouraged from pursuing employment opportunities or advancing their careers due to the frequent occurrence of harassment in public spaces and the lack of social acceptance. These societal challenges are profoundly rooted and necessitate significant cultural and educational endeavors to dismantle detrimental stereotypes and establish a more inclusive environment. In order to mitigate stigma and advance equality, it is imperative to implement initiatives that prioritize the promotion of positive representation, education, and visibility of transgender individuals in the media, institutions, and workplaces.

Further, people looking for jobs and those working for NGOs have voiced differing opinions on their rights. For instance, an area manager (Case 14) was apprehensive about the ramifications of adopting a transsexual identity but felt comfortable in his masculine identity. Candidates for jobs have stated that they have been aware of their basic rights, but they did not know about the safeguards afforded to transgender people, who have been subject to marginalization and discrimination in the workplace (Case 2, Case 22). The respondents have, on the whole, shown a serious lack of comprehension of their legal rights and safeguards, which has been rendered worse by unfavorable interactions with law enforcement and widespread prejudice in society. Based on a deep-seated skepticism of the legal system's capacity to bring about significant change for Bangladesh's transgender population, their attitudes reflect this.

5.3.3 Case similarity of national legislative movement awareness

Figure 9 shows how respondents from Hungary and Bangladesh were informed about legislative developments. This comparative study reveals a crucial difference in legal knowledge that has a substantial influence on transgender people's capacity to seek and get justice and legal protection in both nations.

Hungarian respondents typically showed a greater degree of awareness compared to their Bangladeshi counterparts, according to an analysis of the respondents' knowledge of national legislative concerns comparing Hungarian and Bangladeshi respondents. For instance, the respondents from Hungary were aware of their legal rights under Hungarian national law, which included particular anti-discrimination laws and organizations like the Directorate-General for Equal Treatment. These respondents also pointed out the discrepancies between the existence of these rules and their actual application, demonstrating a sophisticated awareness of the advantages and disadvantages of national legal safeguards.

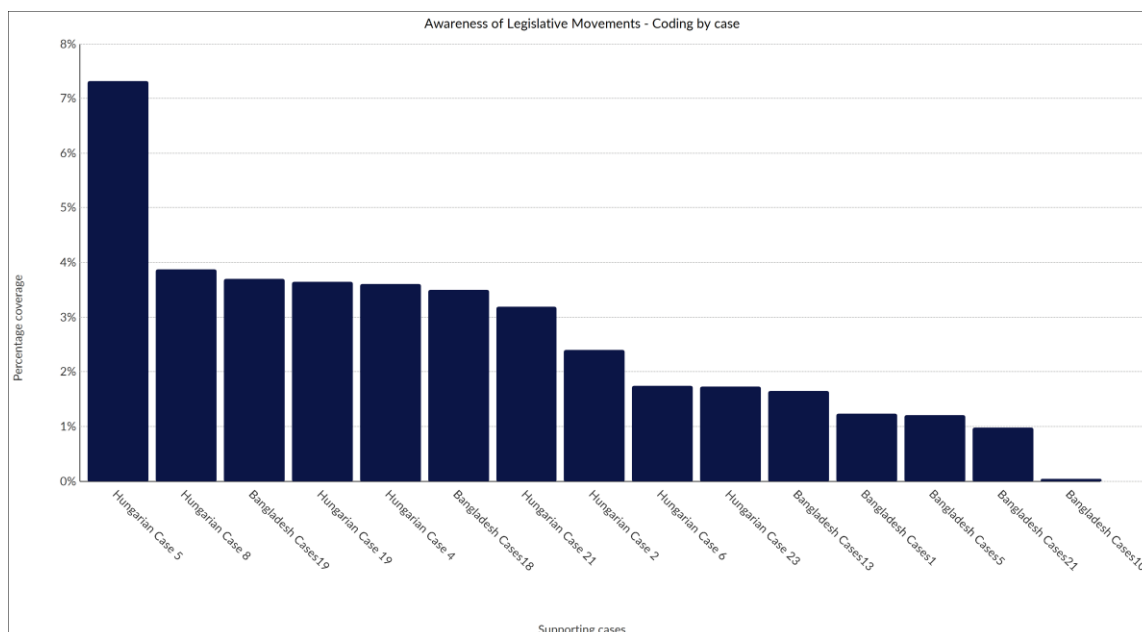


Figure 9 case similarity of legislative awareness word count percentage.

However, respondents from Bangladesh, especially those working in the unorganized sector, have often shown a lack of knowledge about national legislative concerns. Many times, they claimed to be unaware of their legal rights and the safeguards afforded by national law. Even in situations where there was some awareness, such as the few training sessions offered by the Social Welfare Ministry, these efforts were judged to be ineffectual and not very useful. Due to their extreme lack of legal knowledge, transgender people in Bangladesh are mostly dependent on unofficial support systems and have a strong suspicion of the judicial system, which they view as being dishonest and ineffective.

The critical role that access to information and legal education plays in empowering marginalized groups to pursue justice and protection is underscored by the disparity in legislative cognizance between Hungary and Bangladesh. The broader availability of resources and public education on LGBTQ+ rights is reflected in the higher level of awareness among transgender respondents in Hungary regarding national legal frameworks, including the existence of anti-discrimination laws and the role of organizations such as the Directorate-General for Equal Treatment. This awareness allows transgender individuals in Hungary to advocate for their rights and traverse legal systems; however, the study also emphasizes the discrepancy between legal frameworks and their practical enforcement more effectively.

In contrast, the insufficient legal knowledge exhibited by respondents in Bangladesh, particularly those in informal sectors, suggests a substantial disparity in both education and information access. In addition to perpetuating a sense of disillusionment with the legal system, the lack of awareness regarding legal rights and protections leaves transgender individuals

vulnerable to discrimination and exploitation. This reinforces societal exclusion, as transgender individuals are more likely to tolerate mistreatment when they lack a clear understanding of their rights. These issues are further exacerbated by the general absence of effective training programs and accessible legal resources in Bangladesh. Consequently, it is essential for both governmental and non-governmental organizations to enhance legal literacy and support services for transgender individuals in order to bridge this gap and promote greater empowerment.

5.3.4 *Discrimination experienced by the respondents.*

The following table (Table 15), which is divided into economic and non-economic (contextual) models, shows a matrix coding inquiry of the case categorization and discriminatory scenarios seen by transgender respondents in Hungary and Bangladesh. According to the traditional economic model, 14.68% of respondents in Hungary and 16.23% in Bangladesh claimed statistical discrimination. In both countries, test-based discrimination—discriminatory actions based on assessments or tests—affects a larger percentage of respondents (42.27% in Hungary and 32.79% in Bangladesh). This suggests that test-based discrimination, especially economic discrimination, was a major problem for transgender people in both nations, with a larger frequency in Hungary.

Table 15 matrix coding query of the case classification and the discrimination scenario of the respondent.

Type of discrimination	Number of cases	
	Hungary	Bangladesh
<i>Classical model- based on economy</i>		
Statistical	7 (14.68%)	3 (16.23%)
Test-based	12 (42.27%)	6 (32.79%)
<i>Contextual model – other than economy</i>		
Formal	7 (18.59%)	4 (13.31%)
Informal	4 (05.68%)	12 (30.19%)
Don't face any discrimination	5 (18.79%)	1 (7.47%)

(Source: Author produces, 2024)

According to the contextual model (Table 15), which accounts for discrimination other than economic ones, formal discrimination affects 18.59% of respondents from Hungary and 13.31% of respondents from Bangladesh. In Bangladesh, 30.19% of cases of informal discrimination—which may involve social and cultural biases—are reported, whereas in Hungary, the rate is 5.68%. It's interesting to note that a larger percentage of respondents in Hungary (18.79%) than in Bangladesh (7.47%), say they have never experienced

discrimination. According to these results, non-economic discrimination is more important in Bangladesh even if economic prejudice is pervasive in both nations. Furthermore, a greater proportion of Hungarian respondents reported not experiencing any form of prejudice, suggesting that Hungary may have stronger societal acceptability or more effective protection measures.

These results underscore the intricate nature of discrimination that transgender individuals encounter in both Hungary and Bangladesh. The data also emphasizes the significant role of non-economic (contextual) discrimination, despite the fact that economic discrimination, particularly test-based discrimination, continues to be a significant challenge in both countries. Informal discrimination is significantly more prevalent in Bangladesh than in Hungary, where formal discrimination appears to be more prevalent, as a result of social and cultural biases. The increased prevalence of informal discrimination in Bangladesh suggests that, in addition to legal and economic constraints, deeply ingrained societal attitudes and prejudices continue to influence the daily lives of transgender individuals. This underscores the necessity of comprehensive societal and cultural changes in both countries to reduce stigma and foster inclusion.

5.3.5 Comparative Crosstabulation Analysis: step against the existing discrimination

The cross-tabulation (Table 16) revealed that Hungarian respondents were more proactive than their Bangladeshi counterparts, with 78% (18 out of 23 cases) taking part in social acts. It may be inferred from this that transgender individuals in Hungary may have a sense of encouragement or empowerment to engage in social action against discrimination. The lower engagement in legal or political activities (35% in Hungary compared to 43% in Bangladesh) implies that there may be difficulties or a lack of faith in the legal system in Hungary. This is despite the fact that the average participation in anti-discrimination initiatives has grown.

Nevertheless, the comparative analysis of respondents' perspectives on the methods they employ to safeguard themselves from preexisting prejudice in Hungary and Bangladesh demonstrates substantial discrepancies in the frequency and mode of actions that transgender individuals take in each country. In Bangladesh, thirteen out of twenty-three respondents, or 56%, reported that they had taken action against prejudice in some capacity, whether it be legal, administrative, or social. The diversity of actions performed is noteworthy, as numerous respondents, including those in cases 4, 10, 12, 13, 14, 16, 18, 19, 20, and 23, consistently reported engaging in all three kinds of actions. This suggests that transgender individuals in Bangladesh are actively pursuing avenues to defend themselves and assert their rights, despite

the systemic barriers they face, as evidenced by their strong level of participation in official, social, and legal channels. Nevertheless, it is evident that a significant number of the respondents are compelled to navigate a complex and frequently antagonistic environment in order to complete these actions, despite the fact that they are commendable. The legal measures in Bangladesh are significant, but they are not always sufficiently protective, and the social and administrative channels are frequently insufficient to address the discrimination that transgender individuals suffer. As a result, transgender individuals in Bangladesh are compelled to employ a variety of strategies to secure their rights, which suggests both a systemic deficit in the provision of sufficient protections and resilience.

In contrast, a significantly higher percentage of respondents in Hungary (91%, or 21 out of 23) reported taking action against prejudice. Hungary's more developed legal infrastructure and stronger support networks may offer transgender individuals improved opportunities to assert their rights and confront discrimination, as indicated by this stark contrast. It is important to note that Hungarian cases 3, 5, 9, 18, and 22 have participated in all three categories of actions—legal, official, and social—which illustrates a comprehensive approach to addressing prejudice. In addition to engaging with governmental bodies or advocacy groups, these respondents have also participated in official actions (e.g., attending protests or participating in awareness campaigns) and social initiatives (e.g., lodging complaints with the Directorate-General for Equal Treatment; taking advantage of legal recourse). This multifaceted approach is indicative of a more organized and accessible system for addressing discrimination, as well as a broader societal willingness to address transgender rights concerns. Hungary's more accessible judicial system, which facilitates easier engagement with legal frameworks, as well as a more comprehensive network of advocacy and support organizations that transgender individuals can rely on, may be one potential explanation for this increased level of involvement.

Additionally, the increased involvement of Hungarian respondents in social and official activities, such as organizing or participating in advocacy events or engaging with non-governmental organizations, suggests a robust community-based strategy for addressing prejudice. This suggests that transgender individuals in Hungary frequently reach beyond the formal legal system to cultivate solidarity and support among their peers. Nevertheless, the results also indicate that, despite the high level of engagement, transgender individuals in Hungary continue to encounter substantial obstacles in confronting prejudice, particularly in the context of employer discrimination, public bias, and gender recognition concerns.

The significance of a more nuanced approach to addressing transgender discrimination is underscored by the disparity in the categories of actions taken between the two countries. Although legal action is essential in both Hungary and Bangladesh, the differences in the levels of community-based and institutional support indicate that transgender individuals in each country encounter distinct systemic obstacles to achieving equality and protection from discrimination. The necessity of further developing community support networks, resources, and more inclusive policies that not only provide legal recourse but also foster a culture of acceptance and respect for transgender individuals is emphasized by the high level of involvement of Hungarian respondents in social and official channels. In Bangladesh, respondents demonstrate a strong dedication to confronting prejudice; however, the absence of adequate institutional support and legal clarity suggests that there is still much to be done to guarantee that transgender individuals have access to comprehensive protection and opportunities in the labor market and related areas.

Consequently, Hungarians have exhibited a higher level of overall involvement, particularly in social and official actions, despite the fact that respondents from both Hungary and Bangladesh have exhibited varying degrees of engagement in the struggle against discrimination. The strengthened legal frameworks in existence and the growing societal awareness of transgender rights are likely the reasons for the increased level of engagement in Hungary. Hungary's proactive approach to addressing transgender discrimination may have been influenced by its membership in the European Union and its adherence to EU anti-discrimination policies. Additionally, Hungarian respondents seem to have greater access to formal support options, such as legal recourse through the Directorate-General for Equal Treatment and other advocacy organizations that advocate for transgender rights. Hungary's increased level of participation in formal actions, such as submitting complaints or engaging with organizations that advocate for transgender issues, is likely due to this increased awareness and access to resources.

In contrast, respondents from Bangladesh have demonstrated a more varied level of engagement in all forms of action, despite the fact that their aggregate participation remains relatively low. This is indicative of the more difficult circumstances in Bangladesh, where systemic discrimination and social stigma continue to significantly impede the capacity of transgender individuals to participate in formal and informal actions against discrimination. The significant obstacles that transgender individuals encounter in obtaining legal, social, and institutional support are reflected in the lower level of involvement in Bangladesh. In Bangladesh, transgender individuals continue to experience a lack of comprehensive

protections in numerous aspects of their lives, such as the workplace, healthcare, and public services, despite the legal recognition of the third gender. In addition, the widespread societal prejudices and the frequently hostile environment for transgender individuals deter a significant number of individuals from taking action, as they are apprehensive about the possibility of retaliation, social exclusion, or a lack of confidence in the legal system's capacity to provide meaningful remedy.

This comparative analysis underscores the importance of specialized approaches to enhance the social and legal support networks in both countries. Although Hungary has a more sophisticated legal framework and a greater degree of public awareness, obstacles persist in the enforcement of anti-discrimination laws and the establishment of inclusive work environments. After achieving legal recognition in Bangladesh, the emphasis must now be on the enforcement and reinforcement of these laws, as well as the modification of public attitudes to alleviate the stigma associated with transgender individuals. Hungary necessitates improved public education campaigns and more consistent legal enforcement, while Bangladesh necessitates more robust anti-discrimination laws, improved access to support services, and pervasive efforts to combat social stigma. Both countries necessitate tailored interventions. In the end, the enhancement of these networks will contribute to the development of a more tolerant and supportive environment for transgender individuals, enabling them to engage in all facets of society, including the workforce, on an equal basis.

Table 16 crosstabulation of the respondents' opinion on their step against existing discrimination.

Case references	Step against existing discrimination	Official	Legal or political	Social	Total	Case references	Step against existing discrimination	Legal or political	Official	Social	Total
Hungarian Case 1	Yes	No	Yes	Yes	3/4 (75%)	Bangladesh Cases1	Yes	No	No	Yes	2/4 (50%)
Hungarian Case 2	Yes	No	No	Yes	2/4 (50%)	Bangladesh Cases2	Yes	No	No	Yes	2/4 (50%)
Hungarian Case 3	Yes	Yes	Yes	Yes	4/4 (100%)	Bangladesh Cases3	Yes	No	No	Yes	2/4 (50%)
Hungarian Case 4	No	No	No	No	0/4 (0%)	Bangladesh Cases4	Yes	Yes	Yes	Yes	4/4 (100%)
Hungarian Case 5	Yes	Yes	Yes	Yes	4/4 (100%)	Bangladesh Cases5	No	No	No	No	0/4 (0%)
Hungarian Case 6	No	No	No	No	0/4 (0%)	Bangladesh Cases6	No	No	No	No	0/4 (0%)
Hungarian Case 7	Yes	No	Yes	Yes	3/4 (75%)	Bangladesh Cases7	No	No	No	No	0/4 (0%)
Hungarian Case 8	Yes	No	No	Yes	2/4 (50%)	Bangladesh Cases8	No	No	No	No	0/4 (0%)
Hungarian Case 9	Yes	Yes	Yes	Yes	4/4 (100%)	Bangladesh Cases9	No	No	No	No	0/4 (0%)
Hungarian Case 10	Yes	No	No	Yes	2/4 (50%)	Bangladesh Cases10	Yes	Yes	Yes	Yes	4/4 (100%)
Hungarian Case 11	Yes	No	Yes	Yes	3/4 (75%)	Bangladesh Cases11	No	No	No	No	0/4 (0%)
Hungarian Case 12	Yes	No	Yes	Yes	3/4 (75%)	Bangladesh Cases12	Yes	Yes	Yes	Yes	4/4 (100%)
Hungarian Case 13	Yes	No	Yes	Yes	3/4 (75%)	Bangladesh Cases13	Yes	Yes	Yes	Yes	4/4 (100%)
Hungarian Case 14	Yes	No	Yes	Yes	3/4 (75%)	Bangladesh Cases14	Yes	Yes	Yes	Yes	4/4 (100%)
Hungarian Case 15	Yes	No	Yes	Yes	3/4 (75%)	Bangladesh Cases15	No	No	No	No	0/4 (0%)
Hungarian Case 16	Yes	No	No	Yes	2/4 (50%)	Bangladesh Cases16	Yes	Yes	Yes	Yes	4/4 (100%)
Hungarian Case 17	Yes	No	Yes	Yes	3/4 (75%)	Bangladesh Cases17	No	No	No	No	0/4 (0%)
Hungarian Case 18	Yes	Yes	Yes	Yes	4/4 (100%)	Bangladesh Cases18	Yes	Yes	Yes	Yes	4/4 (100%)
Hungarian Case 19	Yes	Yes	Yes	No	3/4 (75%)	Bangladesh Cases19	Yes	Yes	Yes	Yes	4/4 (100%)
Hungarian Case 20	Yes	Yes	Yes	No	3/4 (75%)	Bangladesh Cases20	Yes	Yes	Yes	Yes	4/4 (100%)
Hungarian Case 21	Yes	Yes	Yes	No	3/4 (75%)	Bangladesh Cases21	No	No	No	No	0/4 (0%)
Hungarian Case 22	Yes	Yes	Yes	Yes	4/4 (100%)	Bangladesh Cases22	No	No	No	No	0/4 (0%)
Hungarian Case 23	Yes	No	Yes	Yes	3/4 (75%)	Bangladesh Cases23	Yes	Yes	Yes	Yes	4/4 (100%)
Total	21/23 (91%)	8/23 (35%)	17/23 (74%)	18/23 (78%)	64/92 (70%)	Total	13/23 (56%)	10/23 (43%)	10/23 (43%)	13/23 (56%)	46/92 (50%)

(Source: Author Produces, 2024)

6 Discussion

The author in this section compares and contrasts the labor market experiences of transgender individuals in Hungary and Bangladesh, emphasizing the significant differences that are influenced by cultural, legal, and societal factors. Although Hungary has improved its constitutional protections and increased awareness of transgender individuals, the actual enforcement of these protections is complicated by recent restrictive legislation and persistent cultural prejudices. This results in a paradoxical situation in which transgender individuals continue to encounter discrimination and inequality in practice, despite the existence of legal rights on paper.

The significance of not only enacting robust laws but also guaranteeing their effective implementation in the presence of societal opposition has underscored by the challenges associated with enforcing these protections. The intricacy of the intersection of cultural and legal factors that influence the employment opportunities and experiences of transgender individuals has illustrated by these findings. Legal frameworks have insufficient to effect meaningful change for transgender workers in the absence of pervasive social acceptance and effective enforcement mechanisms. Conversely, in Bangladesh, numerous *Hijra* individuals have been compelled to enter the informal sector, where they are subjected to even greater marginalization as a result of the absence of robust legal protections, pervasive social stigma, and discrimination. This exclusion from formal employment not only limits their access to economic opportunities but also exacerbates their social isolation and susceptibility to exploitation, further entrenching the cycle of poverty and marginalization they endure.

Nevertheless, the discussion section has organized around three primary objectives, each of which is accompanied by a distinct subheading, in order to further explore the intricacies of transgender labor market participation in both countries. The initial objective has to investigate the impact of various legal frameworks on the labor market participation of transgender individuals. In Hungary, progress in this field has been impeded by persistent societal biases and recent legislative setbacks.

Although there have been some legal advancements, such as anti-discrimination laws, their implementation is still inconsistent and frequently undermined by societal resistance, resulting in a limited real-world impact. Transgender individuals continue to experience discrimination in the workplace, and the absence of supportive policies or organizational commitment to diversity exacerbates this issue. In contrast, transgender individuals in

Bangladesh are subjected to systemic exclusion from the formal labor market, a situation that has been significantly influenced by societal prejudice and a lack of legal protections. In Bangladesh, transgender individuals are trapped in the informal sector, where they are more susceptible to exploitation and have fewer opportunities for upward mobility, due to the profoundly entrenched cultural stigma and the absence of robust anti-discrimination laws. The legal environment in both countries underscores the substantial impediment that transgender individuals face in achieving equality in the workforce due to the absence of a distinct, enforceable framework.

The second objective delves into the critical role that legal reforms and public awareness initiatives play in shaping societal attitudes toward transgender individuals in the workforce, examining the influence of national legislative changes on public attitudes. In Hungary, societal attitudes are largely entrenched, and public awareness campaigns are insufficient to alter the deep-rooted biases against transgender people, despite the existence of some legal protections. This societal resistance to transgender inclusion is a significant impediment to the promotion of equitable employment practices and the transformation of workplace cultures.

Conversely, the public's perceptions of transgender individuals have not significantly changed as a consequence of Bangladesh's inadequate legal framework and inadequate enforcement of existing protections. The absence of effective public education and awareness programs exacerbates societal biases and perpetuates detrimental stereotypes, thereby complicating the process of transgender individuals gaining acceptance in the labor market. Even the most well-intentioned legal changes will fail to achieve their intended impact in the absence of a corresponding effort to alter public attitudes through education and awareness. The significance of legal reforms is evident in both contexts.

Bangladesh shows limited progress, while Hungary struggles despite international support, as the third objective evaluates the results of both global and domestic legislative measures. Although global advocacy and international organizations have contributed to the increase in awareness and the development of pressure for reform in both countries, the local implementation of these measures remains inconsistent. International support has facilitated certain legal reforms in Hungary; however, the political environment, which is further exacerbated by the emergence of nationalism and conservatism, has impeded further advancement. Hungary has made progress in certain sectors, such as the recognition of gender identity and the provision of health care access, despite the obstacles it faces.

In contrast, Bangladesh has experienced minimal effects from global legislative measures due to the country's greater obstacles regarding the legal recognition of transgender identities and a lack of political will to enforce protections. The situation for transgender individuals remains severe, with limited access to formal employment opportunities and persistent societal exclusion, despite minor improvements, such as the recognition of the third gender in official documents. The comparative analysis emphasizes the critical role of both domestic legal frameworks and global advocacy in determining the outcomes for transgender individuals. However, it also emphasizes that international support cannot be sufficient in the absence of local political will and effective implementation.

Critical insights from the scholastic findings have provided through the inclusion of a theoretical contribution and policy implications in distinct subheadings. The text underscores the necessity of more robust legal protections that are both enforceable and consistent with international human rights standards. It has imperative to guarantee that transgender individuals have access to formal employment opportunities that offer economic stability and social inclusion in order to cultivate a more inclusive labor market. Furthermore, in order to challenge profoundly ingrained stereotypes and foster an understanding of gender diversity, public education campaigns are required. Global cooperation is essential; however, it must be accompanied by a robust domestic dedication to reform and implementation. The transition from legal recognition to practical inclusion has a substantial obstacle in both Hungary and Bangladesh, necessitating both legal and cultural transformations to establish a labor market that is truly equitable for transgender individuals.

6.1 Employment status of transgender individuals

The significance of studying the well-being of transgender individuals has been emphasized in numerous studies over the past few years (Aziz and Azhar, 2019; Koch et al., 2020; Akter and Saha, 2024; Gomes de Jesus et al., 2020; Mount, 2020; Primecz and Pelyhe, 2023; Ünsal et al., 2024). However, there are a limited number of studies that have specifically addressed the employment status of transgender individuals and provided a cross-cultural comparative analysis. The initial objective of this study was to comprehend the employment status of transgender individuals in both Hungary and Bangladesh, with a particular emphasis on the substantial differences and obstacles encountered in these countries, in order to address this disparity.

It has been noted that the employment situation of transgender individuals in Hungary has been inconsistent, with some individuals securing official employment positions. Similar

to previous research conducted by Kövér et al. (2021) and Gregor and Verebes (2023), transgender individuals in Hungary have discovered employment opportunities in a variety of sectors, such as software development, NGOs, and administrative positions.

However, they have frequently encountered prejudice and social marginalization in these roles, despite the fact that these opportunities have been made available to them, with Moretti (2023) on their side. For instance, an NGO's transgender program coordinator has reported that they have encountered institutional bias, despite finding employment fulfillment. In the same vein, administrative assistants and software developers have experienced feelings of isolation and undervaluation as a result of their gender identity. This suggests that, despite the existence of formal employment opportunities, the working environment has not always been inclusive or supportive of transgender individuals (Thiel et al., 2023). This situation is further exacerbated for retired transgender professionals, such as former high school teachers, who have encountered difficulty in obtaining equitable pension systems and public services, thereby exacerbating their marginalization in their post-professional lives.

Transgender individuals in Bangladesh have been predominantly employed in informal sectors, which is in striking contrast to their experiences in Hungary (Amanullah et al., 2022; Aziz & Azhar, 2019). This study also discovered that social stigma and discrimination against transgender individuals in Bangladesh have significantly restricted their access to formal employment, in accordance with Al-Mamun et al. (2022). Many transgender individuals, particularly those identified as *Hijras*, have been compelled to engage in informal occupations, including begging and sex work, as a result of systemic violence and widespread societal disdain (Al-Mamun et al., 2022; Sifat & Shafi, 2021). This situation underscores the severe lack of formal employment opportunities and the substantial obstacles to economic stability that transgender individuals face in Bangladesh, a concern that has been previously addressed in previous studies (Al-Mamun et al., 2022; Aziz & Azhar, 2019; Banik et al., 2023; Sifat & Shafi, 2021). Many transgender individuals have been compelled to engage in low-income and precarious work due to their inability to secure stable, formal employment, which has further entrenched them in cycles of poverty and marginalization.

Unique to this study is its comparison of the employment status in Hungary and Bangladesh, which reveals both similarities and differences. Transgender individuals continue to experience severe prejudice and a lack of comprehension, which adversely affects their professional lives, despite the existence of more formal career opportunities in Hungary. Despite holding official positions, numerous respondents from Hungary reported encountering obstacles to workplace inclusion, including isolation, microaggressions, and feelings of

undervaluation. Despite the fact that these experiences are less overtly hostile than those in Bangladesh, they still contribute to the sense of exclusion and create significant barriers to career advancement. Conversely, this investigation demonstrated that Bangladesh's professional environment is primarily informal, with transgender individuals encountering severe social stigma and marginalization, particularly in the unorganized sectors. They are more susceptible to being utterly excluded from the formal job market, which is a significant factor in the prevalent dissatisfaction with their career prospects. Consequently, Bangladesh's employment environment is characterized by heightened vulnerability to exploitation, fewer opportunities for career advancement, and reduced socioeconomic mobility.

The employment status of transgender individuals in the labor market is significantly influenced by societal perceptions and structural constraints in both countries (Yasmeen et al., 2024). Although Hungary offers more formal employment opportunities, the career potential of transgender individuals is restricted by the ongoing prejudice and institutional discrimination. In contrast, Bangladesh provides a limited number of formal employment opportunities, with transgender individuals being primarily restricted to informal and stigmatized sectors. The significance of inclusive policies, public awareness campaigns, and supportive workplace practices in enhancing the career prospects and overall well-being of transgender individuals in Hungary and Bangladesh is emphasized by the results of this study (Aksoy et al., 2024; Price et al., 2024). In the absence of such measures, the disparity between the legal rights of transgender individuals and their actual employment prospects will persist, thereby exacerbating their marginalization in the workforce.

Additionally, the results of this investigation underscore the influence of societal attitudes on the employment experiences of transgender individuals in both Hungary and Bangladesh. Although legal reforms in Hungary have offered some protection to transgender individuals, societal attitudes continue to serve as a substantial impediment to their complete integration into the workforce. Despite the legal framework in place, the persistence of stereotypes, ignorance, and negative perceptions about transgender people often manifests in workplace dynamics, creating an environment in which transgender employees feel marginalized, isolated, or undervalued. The societal attitudes toward transgender individuals, particularly *Hijras*, are even more profoundly ingrained in Bangladesh, as evidenced by the pervasive discrimination and exclusion from mainstream employment. This widespread stigma frequently compels transgender individuals to engage in low-paying, hazardous employment, which further solidifies their status as second-class citizens. These cultural barriers are not readily surmounted, and legislative initiatives alone have been insufficient in transforming

deeply ingrained biases. This emphasizes the necessity of complementary strategies, including public awareness campaigns, education reform, and positive media representation, to challenge these harmful societal norms and establish an environment in which transgender individuals can flourish professionally, irrespective of their legal rights.

6.2 Public perception on transgender employment

This study, in accordance with prior research (Campbell et al., 2019b; Reiman et al., 2023; Verbeek et al., 2020; Walters et al., 2017), investigates the experiences of transgender individuals in Hungary and Bangladesh to ascertain the impact of national legislative developments on the public's perception of transgender individuals serving in traditionally binary gender-dominated fields. The results demonstrate the intricate and multifarious influence of national legislation on the integration of transgender individuals into the workforce, as well as the ways in which their visibility and treatment in public spaces affect their professional prospects.

The results of this study indicate that the public's perceptions and interactions with transgender individuals in the workplace have been significantly influenced by the legislative environment in Hungary. Biases of various types, as well as instances of systemic prejudices and discriminatory acts, have been documented, as in Barát (2022). In comparison to numerous other European nations, Hungary has made substantial progress in enhancing legal protections for transgender individuals (Fedorchenko, 2024; Wilson, 2020).

However, these legislative modifications have not entirely eliminated social prejudice. Microaggressions, mis-gendering, and social marginalization persist for transgender individuals in Hungary, particularly those employed in customer service, sales, and social media management. Although less overt than the violent acts observed in Bangladesh, these forms of discrimination continue to have a profound impact on the psychological and professional well-being of the transgender community. In Hungary, the legal framework provides transgender individuals with somewhat enhanced rights to challenge discrimination and pursue remedies, despite these effects. In contrast, Bangladesh's medical and legal support systems are largely underdeveloped and inaccessible.

Conversely, despite some degree of legal recognition, prejudice and social stigma against transgender individuals, particularly those in the *Hijra* community, continue to be widespread in Bangladesh, as evidenced by existing scholarship (Aksoy et al., 2024; Al-Mamun et al., 2022; Amanullah et al., 2022). The respondents of the study frequently reported encountering discriminatory actions and hostile attitudes from the public, with a significant

number of them expressing negative opinions about transgender individuals. For example, *Hijra* leaders and their followers disclosed that they were denied access to fundamental social services and employment opportunities, subjected to abuse, and regarded as second-class citizens.

This study documented instances of severe harassment, physical assault, and the absence of police protection for transgender individuals, in contrast to the findings of Aziz and Azhar (2019). These experiences emphasize the substantial discrepancy between the legal recognition and the public's inclination to embrace transgender individuals as equal members of society. The ineffectiveness of legislative efforts in transforming public attitudes and ensuring equitable treatment for transgender individuals in Bangladesh is underscored by the failure to provide effective legal protections or ensure their enforcement (Al-Mamun et al., 2022).

The employment of transgender individuals in mainstream sectors continues to be significantly impeded in both Hungary and Bangladesh. In Bangladesh, transgender individuals are subjected to severe social exclusion and the perpetual prospect of physical injury, particularly in the informal economy. Many transgender individuals are compelled to resort to prostitution or begging as a means of survival due to the absence of professional opportunities and recognition. These individuals frequently encounter difficulties in obtaining consistent employment or accessing educational opportunities as a result of systemic discrimination, which often forces them to engage in informal labor. Although some legislative measures have been implemented to address the rights of transgender individuals, these laws have had limited success in enhancing their socio-economic circumstances, thereby emphasizing a significant disparity between the existence of legal protections and the realities of practice. Consequently, a cycle of poverty and marginalization is perpetuated, leaving many transgender individuals in Bangladesh with limited opportunities for upward mobility.

In Hungary, transgender individuals confront persistent challenges, including social exclusion, microaggressions, and systemic inequalities, particularly in industries such as sales and customer service, despite some evidence of inclusion in professional contexts. The anxiety of job loss or professional stagnation as a result of their gender identity continues to be widespread. In the aftermath of 2020, legislative modifications have implemented more stringent regulations regarding gender recognition, which have exacerbated the challenges faced by transgender individuals in obtaining professional and social acceptability (Barát, 2022; Sony, 2023). Transgender individuals in Hungary continue to face a hostile or indifferent

societal environment, despite the existence of legal rights. Public attitudes and workplace cultures have been sluggish to adjust to the changing legal framework.

This study is one of the first exhaustive comparisons between Hungary and Bangladesh in terms of the treatment of transgender individuals. The experiences of transgender individuals in these two countries are characterized by both significant differences and similarities, which are influenced by the unique cultural backgrounds and legal contexts of each country. The *Hijra* community in Bangladesh experiences severe physical and social alienation, which further exacerbates their marginalization, in contrast to the comparatively subdued, yet still significant, social exclusion and professional barriers that transgender individuals in Hungary encounter.

However, legislative measures in both countries have failed to establish an environment that is truly inclusive and equitable for transgender individuals. It is evident in this comparative analysis that national legislative movements have a multifaceted impact on the perceptions and occupational involvement of transgender individuals in the workforce. The results underscore the necessity of more robust, effective legislative frameworks and societal awareness initiatives to bridge the gap between policy and actual social integration. Meaningful progress can only be achieved by ensuring that both legal systems and social attitudes evolve in tandem in order to achieve greater workplace inclusivity for transgender individuals in both countries.

The study also emphasizes the urgent necessity of more comprehensive public education campaigns to combat the persistent social stigma experienced by transgender individuals in both Hungary and Bangladesh. While legal frameworks may provide protections on paper, societal attitudes are frequently profoundly ingrained, making it challenging for transgender individuals to fully engage in the workforce.

Although public awareness campaigns have increased in Hungary, they have not been sufficient to substantially alter the public's perception, particularly in professional settings where gender non-conformity is still viewed with suspicion or discomfort. In Bangladesh, where cultural biases are even more deeply ingrained, it is imperative to provide education on gender diversity and inclusion in order to mitigate discrimination and violence against transgender individuals. Transgender individuals will continue to encounter obstacles in both formal and informal employment sectors unless proactive measures are taken to alter public perceptions, whether through media, community outreach, or school curricula. A coordinated effort from governments, civil society, and advocacy groups is essential to create a more inclusive and supportive environment for transgender individuals in the workplace and beyond, as it is crucial to bridge the divide between legal recognition and social acceptance.

6.3 The impact of international and national legal actions on transgender workers in Hungary and Bangladesh

The third objective of this study was to analyze the effects of various national and international legal initiatives on the employment status of transgender people in Hungary and Bangladesh. Like previous studies (i.e., Campbell et al. (2019b); Dicklitch-Nelson and Rahman (2022); Koch et al. (2020); Moretti (2023); Mount (2020); Price et al. (2024); Primecz and Pelyhe (2023); Verbeek et al. (2020); Walters et al. (2017)), this analysis have demonstrated that these countries' unique legislative and cultural settings have formed their transgender people's experiences in different ways.

while the situation in Hungary is equally problematic, this study presents a distinct mix of legal and social factors. Unlike other studies (e.g., Barát (2022); Gregor and Verebes (2023); Kováts (2020); Kövér et al. (2021); Roots (2022)), the author have found that transgender people in Hungary have a significantly higher understanding of their rights, which is backed up by both national anti-discrimination laws and international human rights conventions. Having said that, really putting these rights into practice has found challenging (Kováts, 2020). For example, recent stringent legislation has made it difficult for transgender people to change their legal gender, reducing their ability to find permanent employment (Barát, 2022; Primecz & Pelyhe, 2023; Roots, 2022). Despite the existence of legal alternatives for addressing harassment and discrimination, such as filing complaints with the Directorate-General for Equal Treatment or seeking assistance from advocacy groups, the effectiveness of these measures has found sometimes hampered by cultural biases and insufficient enforcement which also evident by hand.

In contrast, in Bangladesh, transgender people, particularly those who identify as *Hijra*, have found consistently facing considerable impediments to legal rights and career possibilities. Despite certain training endeavors by the Social Welfare Ministry (Dutta, 2023), many transgender persons, including *Hijra* Giri leaders, consider these efforts unsuccessful. The police's repeated demand for protection money worsens their situation, continuing a cycle of exploitation and marginalization (Al-Mamun et al., 2022; Aziz & Azhar, 2019; Sifat & Shafi, 2021). Such findings have reflected in their general skepticism about the legal system's potential to generate significant change (Akter & Saha, 2024), with respondents questioning the existence of particular laws protecting their rights as well as the possibility of society obedience to such laws.

When comparing the employment sector experiences of transgender individuals in both nations, it becomes evident that there are structural concerns at work. Informal employment

has become common in Bangladesh, particularly among *Hijra* individuals who depend on traditional occupations (Al-Mamun et al., 2022) but also endure persistent mistreatment and prejudice (Aziz & Azhar, 2019). There has a significant scarcity of official job prospects, and individuals often mention experiencing police and societal mistreatment. In contrast, in Hungary, although certain transgender people have been able to obtain formal employment, they frequently face workplace discrimination, a lack of support (Kováts, 2020), and restricted chances for career advancement. Instances of employers improperly addressing workplace harassment have prevalent, resulting in transgender employees experiencing feelings of isolation and vulnerability.

A further significant difference has been found in the function of international organizations. In Hungarian respondents possess a greater level of knowledge on the functions and significance of international organizations such as the ILO and the European Court of Human Rights. Nevertheless, the influence attributed to these organizations has been constrained by legal limitations imposed by national legislation and societal beliefs. On the other hand, in Bangladesh, there has been a widespread lack of awareness of the assistance provided by international organizations such as UNICEF and UNDP. The respondents have shown a need for stronger legal safeguards and more explicit regulations around property ownership in order to improve their financial security.

In essence, Hungary and Bangladesh both face considerable difficulties in safeguarding and advancing the legal rights of transgender individuals, while the nature and consequences of these difficulties vary. Transgender individuals in Hungary encounter legal barriers and gaps in enforcement, despite having comparatively stronger institutional rights. On the contrary, the *Hijra* population in Bangladesh faces challenges due to the absence of legal acknowledgment and widespread societal and police persecution. Both situations emphasize the urgent need for extensive legal overhauls and societal instruction to close the divide between the intended purpose of laws and their actual implementation, guaranteeing fair and encouraging employment opportunities for transgender individuals.

In spite of the fact that Hungary and Bangladesh have made significant progress in recognizing transgender rights, the implementation of these legal safeguards continues to be uneven. The gap between legal recognition and real implementation continues to be a considerable obstacle in Hungary, despite the fact that the country has legislation that are rather progressive, such as anti-discrimination measures and international human rights agreements. The legal obstacles that transgender people in Hungary must overcome, particularly in light of

the adjustment that will be made to gender recognition legislation in 2020, highlight the challenges that are involved in putting rights into effect.

On the other hand, the transgender community in Bangladesh, particularly those who identify as *Hijra*, have long faced systemic exclusion and a lack of formal legal recognition, which has led to socioeconomic marginalization and pervasive economic instability. The cultural stigmas that persist, in conjunction with the inadequacies of national legislation to effectively address discrimination in the workforce, continue to exacerbate the socio-economic vulnerabilities that transgender individuals encounter in both countries. The conclusion that can be derived from this comparison is that, despite the critical role of legal frameworks and international organizations, their efficacy is substantially influenced by societal attitudes, enforcement mechanisms, and national policies. In order to encourage an inclusive labor market and enhance the quality of life for transgender individuals, it is imperative that Hungary and Bangladesh prioritize comprehensive legal reforms, raise public awareness, and guarantee the consistent enforcement of anti-discrimination laws that are truly inclusive of transgender individuals.

6.4 Integration of Recent Legal Developments and Pathways for Reform

One of the principal legal contributions of this dissertation is its integration of recent international and regional legal developments into the comparative analysis of transgender labor rights. The EU Pay Transparency Directive (Directive (EU) 2023/970 of 10 May 2023) represents a significant normative advance in European labor law. Its primary purpose is to close the gender pay gap through binding obligations on pay transparency, including the right of workers to access information on pay levels and the imposition of reporting duties on employers with more than 100 employees. Although drafted in binary terms of “men” and “women,” the Directive indirectly opens an avenue for contesting discrimination against transgender and non-binary workers, insofar as pay transparency tools can expose differential treatment that correlates with gender identity or expression. Nevertheless, the absence of explicit reference to gender identity limits its transformative potential. As such, the Directive exemplifies a broader trend in EU law: progressive in scope yet tethered to binary conceptions of gender. This analysis underscores the need for future directives to extend their reach beyond sexual orientation, which is covered by Directive 2000/78/EC, to encompass the full spectrum of gender diversity.

At the global level, the International Labor Conference (ILC) 2025 reports reflect an increasing sensitivity to gendered and intersectional inequalities in the labor market. For

instance, the Committee of Experts urged stakeholders to promote equitable hiring practices, capacity-building, and the collection of disaggregated data in male-dominated industries such as shipping (ILC, 113th Session, Report III(A), 2025, p. 56). The same report drew attention to persistent deficiencies in states' capacity to identify and protect victims of trafficking, noting the lack of gender-sensitive procedures and the vulnerability of women and LGBTQ+I+ communities (*ibid.*, pp. 636–637). Similarly, the 2023 General Survey on Convention No. 111 emphasized that “each person’s deeply felt internal and individual experience of gender” must be respected in anti-discrimination law (ILC, 2023, p. 54). Together, these developments highlight the doctrinal and institutional shift towards recognizing sexual orientation and gender identity as integral to equality at work. However, as the comparative chapters of this study demonstrate, both Hungary and Bangladesh fall short of these evolving standards: Hungary by restricting gender recognition through Article 33 of the Fundamental Law, and Bangladesh by maintaining a framework of symbolic recognition (third gender status) without embedding enforceable workplace protections in the Labour Act 2006.

Against this backdrop, the dissertation makes a normative contribution by outlining concrete legal reforms at international, regional, and national levels. At the international level, ILO Convention No. 111 requires amendment to explicitly include gender identity and expression among the prohibited grounds of discrimination, thereby closing the gap between supervisory interpretations and treaty text. At the EU level, directives should evolve beyond the current focus on sexual orientation and adopt explicit references to gender identity and expression, ensuring that transgender workers are recognized not merely through indirect interpretation but through unequivocal statutory protection. At the national level, Hungary must repeal or substantially revise Article 33 to restore legal gender recognition and align with obligations under EU law, the European Convention on Human Rights, and the jurisprudence of the Court of Justice of the European Union. Conversely, Bangladesh should amend its Labor Act 2006 to incorporate sexual orientation and gender identity as protected categories and ensure that constitutional guarantees of equality are operationalized in practice. Such reforms would not only close normative gaps but also bridge the persistent disjuncture between symbolic recognition and substantive equality.

By weaving together international instruments, regional directives, and national frameworks, this dissertation contributes to legal scholarship by situating transgender labor rights at the intersection of hard law (binding treaties and directives), soft law (supervisory comments and recommendations), and domestic implementation. The findings demonstrate that while global and regional norms are moving toward inclusivity, their impact is mediated—

and often diluted—by domestic legal and political contexts. This highlights the necessity of both doctrinal reform and context-sensitive implementation strategies if the ideal of “decent work for all” is to extend meaningfully to transgender individuals.

7 Legal, theoretical, and policy contribution of the study

7.1 Legal Contribution of the Study

This section outlines the legal contribution of the dissertation by analyzing how the findings intersect with international legal instruments, national labor frameworks, and broader socio-legal dynamics affecting transgender labor inclusion. Rather than offering a doctrinal interpretation of legal texts, the study provides an empirically grounded, comparative, and context-sensitive perspective on how legal rights are experienced, interpreted, and, in many cases, rendered ineffective for marginalized populations. The following subsections illustrate this contribution in detail.

7.1.1 *Bridging the Gap Between Legal Text and Social Reality*

A key legal insight emerging from this study is the disjunction between legal recognition and substantive protection. In both Hungary and Bangladesh, formal legal frameworks recognize some aspects of gender equality or non-discrimination. However, these provisions rarely translate into tangible outcomes for transgender individuals in the labor market. For instance, Bangladesh’s formal recognition of a “third gender” status has not been followed by corresponding inclusion of gender identity in labor law, anti-discrimination statutes, or equal opportunity policies. Similarly, in Hungary, despite EU-mandated anti-discrimination directives, the effective rollback of gender recognition rights since 2020 has limited access to employment and public services for many transgender individuals.

By centering lived experiences, the study contributes to the legal literature by illustrating how formal legal commitments often remain symbolic when not supported by enforcement, implementation mechanisms, and institutional responsiveness. This offers a practical critique of the “law in books vs. law in action” divide and invites reflection on how legal frameworks must be evaluated through the lens of those they are intended to serve.

7.1.2 *Interrogating the Limitations of International Legal Instruments*

The study also contributes to legal scholarship by identifying structural limitations within foundational international labor instruments. While ILO Conventions No. 100 and 111 articulate important principles of equality and non-discrimination, they fail to explicitly include

gender identity or expression. As a result, these conventions allow national-level actors to interpret “sex” or “gender” in binary, exclusionary terms. This has particularly serious implications in Bangladesh, where gender-diverse persons lack any enforceable protection under labor law despite international ratifications.

Likewise, although the Yogyakarta Principles provide progressive interpretations of international human rights in relation to sexual orientation and gender identity, they lack binding legal authority. Consequently, the study underscores the need for international legal reform that moves beyond symbolic or aspirational frameworks to instruments that are legally enforceable and normatively clear on the inclusion of transgender persons in labor protections.

7.1.3 A Comparative Legal Perspective from the Global South and EU

By comparing Bangladesh and Hungary—two countries with divergent legal systems, governance cultures, and geopolitical affiliations—the study offers a unique comparative legal insight. Hungary, despite being part of the EU’s sophisticated human rights regime, exhibits legal regression in gender recognition and growing institutional hostility. Bangladesh, by contrast, demonstrates symbolic progress without structural change, where transgender individuals receive third-gender recognition in documentation but lack access to legal protections or employment entitlements.

This comparative approach challenges the assumption that legal progress is linear or geographically uniform. It also broadens the scope of transgender legal studies, which are often focused on either Global North or Global South contexts in isolation. The legal contribution here lies in showing how different legal cultures produce similar outcomes of exclusion, albeit through different institutional logics.

7.1.4 Grounded Legal Recommendations Informed by Empirical Evidence

Another critical contribution of this dissertation is the formulation of legal and policy recommendations grounded in empirical fieldwork, rather than abstract legal theory. These include:

- The explicit inclusion of gender identity and expression as protected categories under national labor and anti-discrimination laws.
- Legal mandates for employers and public institutions to implement gender-inclusive hiring, documentation, and complaint procedures.

- State-sponsored legal education and sensitization programs targeting labor officers, HR managers, and judicial actors to promote awareness of transgender rights.
- Development of institutional mechanisms that allow transgender persons to seek remedies without risk of harassment or secondary victimization.

These recommendations are modest but actionable, and they highlight the importance of localizing international legal norms in culturally and institutionally appropriate ways.

7.1.5 *Advancing a Socio-Legal Understanding of Transgender Labor Rights*

A central contribution of this thesis lies in its advancement of a socio-legal perspective on transgender labor rights, shifting the analytical focus from the formal structures of law to the lived experiences of those whom the law purportedly protects. In doing so, the study underscores that law is not merely a body of written texts, judicial decisions, or codified principles, but a social institution that functions within complex webs of meaning, perception, and power. The law's relevance for transgender individuals in Hungary and Bangladesh is not determined solely by what is written in legal instruments, but by how these instruments are interpreted, accessed, and operationalized in everyday life.

This approach builds upon and contributes to the socio-legal tradition which critiques legal formalism for its inability to account for how law is enacted on the ground—particularly among structurally marginalized populations. For many transgender individuals in this study, the law has been experienced not as a source of empowerment, but as a distant, abstract, or even hostile force, shaped more by exclusion and silence than by protection. For instance, in Bangladesh, participants repeatedly emphasized that while third-gender identity has recognized on paper, this recognition has not translated into meaningful labor rights, workplace protections, or access to public employment schemes. In Hungary, despite the existence of EU-based anti-discrimination laws, the rollback of legal gender recognition and political hostility toward LGBTQ+ populations have rendered those laws inaccessible or ineffective in practice.

In this light, the thesis argues that understanding transgender labor exclusion requires a methodological shift: *from law as a prescriptive framework to law as a socially constructed, lived reality*. This reconceptualization of law foregrounds the relational, contested, and experiential dimensions of legal engagement. It views the law as something people navigate, interpret, resist, and survive—not merely something that exists in codes or judicial rulings. As such, the law becomes a site of negotiation, where dignity, visibility, and justice are pursued by individuals often without institutional support or formal recognition.

Moreover, this perspective reveals the hidden costs of legal exclusion—not only in material terms (such as unemployment or poverty), but also in psychological and emotional terms. Participants expressed feelings of invisibility, fear, and abandonment in relation to legal and administrative structures. These insights expose the emotive and symbolic functions of law, as well as the trauma produced when individuals are denied the sense of legal personhood. In many cases, transgender individuals reported avoiding legal institutions altogether due to anticipated discrimination or bureaucratic confusion, which further entrenched their social and economic marginalization.

This people-centered understanding of law also challenges dominant models of legal reform that focus solely on changing statutes or issuing policy directives. The findings suggest that legal reform, in isolation, is insufficient. Without parallel shifts in administrative culture, public awareness, and social attitudes, legal changes often remain inert or are co-opted by exclusionary practices. This resonates with broader socio-legal scholarship which cautions against assuming that legal change naturally leads to social transformation, especially in contexts marked by entrenched inequality.

Finally, the thesis contributes to socio-legal theory by highlighting the interdependence between law and social trust (see section 6.5). When the law fails to deliver justice or when legal institutions are perceived as unwelcoming or punitive, marginalized communities disengage from formal mechanisms of redress. This erosion of trust limits the transformative potential of law, reducing it to a performative exercise that bears little consequence for those most in need of protection. Conversely, building inclusive legal systems requires not only policy and legislative shifts, but also sustained efforts to restore faith in legal institutions through accessibility, empathy, and accountability.

In sum, this study expands socio-legal understanding by reframing transgender labor exclusion as not merely a legal or economic issue, but as a legal experience deeply intertwined with identity, recognition, and power. It advocates for a jurisprudence that listens to the margins and constructs legal meaning not from statutes alone, but from the voices and struggles of those who live with and through the law every day.

7.2 Theoretical Contribution

This dissertation, “Challenge of Transgender Involvement in the Labor Force: A Comparative Study Between Hungary and Bangladesh,” has made substantial theoretical progress in the understanding of transgender discrimination in employment contexts by utilizing and expanding existing models of discrimination. This study has expanded beyond conventional

frameworks by providing a more comprehensive and nuanced analytical approach, in recognition of the multifaceted and intricate nature of transgender discrimination.

The study has created a comprehensive framework that enables a more in-depth analysis of the factors that influence the experiences of transgender individuals in the workforce by incorporating both the Classical and Contextual models of prejudice. The classical model of discrimination, which emphasizes economic and structural factors, underscores the extent to which transgender individuals are frequently excluded from the labor market due to their socio-economic status, education, and gender identification. Furthermore, the Contextual model underscores the significance of socio-cultural and institutional contexts, demonstrating how the unique cultural, legal, and historical environments of Hungary and Bangladesh influence the nature and severity of discrimination that transgender individuals encounter in their respective countries.

This dissertation offers a more comprehensive comprehension of transgender discrimination by combining these two models, which recognizes the structural and contextual factors that contribute to marginalization in the labor market. Through the integration of these models, a valuable theoretical lens is provided to examine the diverse ways in which transgender individuals experience exclusion, including legal barriers, social stigmatization, and economic inequalities.

Not only does the framework presented in this study contribute to the theoretical understanding of transgender discrimination, but it also offers actionable insights for policymakers and advocates who are striving to implement more inclusive employment practices. Figure 5 illustrates the key components of these models and how they interact to create a multifaceted view of transgender discrimination in employment. The study's theoretical contributions expand the scope of previous research, offering a more integrated and dynamic model that can be applied to future studies on the labor force participation of transgender individuals across different cultural and legal contexts.

7.2.1 *Classical Model-Based on Economy*

The Classical model of discrimination has been validated by the analysis, with a particular emphasis on the dimensions of statistical and taste-based discrimination. The labor market experiences of transgender individuals in Hungary and Bangladesh are still being influenced by these two forms of discrimination, which are profoundly entrenched in economic theories. The tendency of employers to rely on stereotypes and assumptions when making employment

decisions about transgender individuals is underscored by statistical discrimination, which accounted for 14.68% of cases in Hungary and 16.23% in Bangladesh.

Employers engage in this form of discrimination when they generalize the characteristics of a specific group, such as transgender individuals, and presume that all members of that group share the same traits, irrespective of their actual qualifications or abilities. Consequently, employers may unjustly evaluate transgender applicants based on their group identity rather than their specific qualifications, which can result in biased decision-making and further marginalization in the workforce. The significance of this discovery is that discrimination is frequently motivated by an excessive reliance on group-based assumptions and a lack of individual assessment.

Conversely, taste-based discrimination, which is more prevalent, was responsible for 42.27% of incidents in Hungary and 32.79% in Bangladesh. This form of discrimination is founded on personal prejudices and biases, as employers demonstrate a profound aversion or disdain for transgender individuals, which has a direct impact on their employment prospects. It implies that for a significant number of employers, their unease with transgender individuals or their gender nonconformity can trump rational decision-making processes. This results in the exclusion of transgender individuals from job opportunities, regardless of their qualifications or experience. Becker (1957) proposed a theory that discrimination is a result of employers' prejudicial attitudes toward specific categories of individuals. Taste-based discrimination is in close alignment with this theory. Employers' employment decisions are influenced by their personal preferences and prejudices, even if they are economically irrational. This form of discrimination is frequently more challenging to combat, as it is rooted in deeply ingrained social attitudes and prejudices that can endure despite the implementation of anti-discrimination laws or policies.

Statistical discrimination, as proposed by Phelps (1972), can also be observed in the employment practices that affect transgender individuals in both Hungary and Bangladesh, further consolidating the classical economic theory of discrimination. Employers employ group characteristics as a substitute for individual productivity when they lack sufficient information regarding individual job applicants, as per Phelps. In the context of transgender individuals, employers may rely on stereotypes regarding their reliability, professionalism, or stability, which are based on preconceived notions about their gender identity rather than their actual work performance or qualifications. Employers may be more inclined to hire cisgender individuals as they believe they will be more "predictable" or "conform" to traditional gender roles, regardless of the actual skillset or potential a transgender individual may bring to the

workplace. This discriminatory practice places transgender individuals at a disadvantage. This form of statistical discrimination perpetuates labor market inequalities and denies transgender individuals equal access to employment opportunities, irrespective of their competence or employment suitability.

These forms of discrimination—statistical and taste-based—combine to demonstrate the continued influence of economic theories of discrimination on the labor market experiences of transgender individuals in Bangladesh and Hungary. The persistent challenges that transgender individuals encounter when pursuing formal employment are underscored by their assertion that their access to equal opportunities in the workforce is frequently restricted by personal prejudices and biased assumptions. In order to resolve these concerns, it is necessary to implement not only legal reforms that safeguard transgender individuals from discrimination, but also cultural and societal transformations that challenge these profoundly entrenched biases and encourage fair, individualized evaluations of job applicants, irrespective of their gender identity.

7.2.2 Contextual Model-Other Than Economy

The study advances the comprehension of discrimination by using the Contextual model, which accounts for non-economic variables that influence discriminatory practices in the workplace. This method has uncovered considerable bias faced by transgender persons in both official and informal contexts. In contrast to the Classical model, which emphasizes economic issues such as job opportunities, salaries, and recruitment methods, the Contextual model expands its focus to encompass the social and cultural aspects of prejudice. The study's findings reveal that prejudice extends beyond explicit economic obstacles to encompass interpersonal and environmental variables inside the workplace.

In Hungary, 18.59% of participants indicated encountering formal discrimination, encompassing compensation disparities, prejudiced recruitment procedures, and restricted prospects for professional progress. This figure underscores the structural obstacles transgender persons encounter in obtaining equitable treatment in formal employment environments. In Hungary, the existence of formal legislative frameworks intended to combat discrimination frequently falls short of its promise due to uneven enforcement and persistent cultural biases against transgender persons. The findings indicate that, despite Hungary's robust legal framework for workplace anti-discrimination, transgender individuals continue to face challenges in obtaining equal opportunities for promotions, salary increases, and equitable treatment, thereby impacting their overall professional development and financial stability.

On the other hand, Bangladesh demonstrated a contrasting dynamic in the lives of those who identify as transgender. The percentage of respondents who experienced informal discrimination, which includes bullying, harassment, and microaggressions, was significantly higher than the percentage of respondents who reported formal discrimination, which was just 13.31%. Within the context of traditional legal frameworks, these informal forms of discrimination, which are frequently ignored, play a significant part in the obstacles that transgender persons encounter on a daily basis in the workplace. Exclusion from workplace activities, insulting remarks, and subtle forms of abuse are all examples of actions that might be considered examples of informal discrimination.

These behaviors all contribute to a climate at work that is unpleasant and unwelcoming. The increased frequency of informal discrimination in Bangladesh highlights the necessity of tackling not just the legal impediments that perpetuate discrimination against transgender persons, but also the cultural and interpersonal aspects that contribute to this prejudice. This finding is consistent with the findings of previous studies (for example, Collins et al. (2015); D. B. Hill and B. L. B. Willoughby (2005); Hoel et al. (2021b); Mattheis et al. (2022); McFadden (2020)), which have highlighted the fact that discrimination against binary and non-binary individuals extends beyond formal economic structures and into the social fabric of workplaces, thereby affecting day-to-day interactions, self-esteem, and mental health.

Apart from that, this study broadens the scope of the investigation by drawing attention to the fact that informal discrimination is a key area of concern. In many cases, informal discrimination is less obvious and more difficult to remedy through legal channels. However, the impact of this type of discrimination may be significant since it has the ability to alter the culture of the workplace and the psychological well-being of transgender persons. Informal discrimination, on the other hand, is frequently characterized by subtle, cumulative behaviors such as exclusion, gossip, or improper comments that contribute to the creation of a poisonous work environment. Formal discrimination, on the other hand, is generally based on situations that are easily recognized, such as salary inequalities or the refusal to promote an employee.

Due to the fact that they have an impact on the transgender person's feeling of belonging and professional identity, these daily experiences of prejudice can be just as detrimental, if not more so, than official discrimination. According to the findings of the study, informal prejudice frequently goes undetected in both Hungary and Bangladesh, where there are few systems in place to report or remedy such actions with regard to discrimination. Not only does this highlight the need for employment regulations that prohibit formal

discrimination, but it also shows the necessity for friendly settings that actively encourage inclusion and respect for transgender persons in all forms.

The significance of analyzing discrimination from a comprehensive perspective is emphasized by the integration of the Contextual model into this investigation. Although formal economic structures and laws are crucial in the prevention of discrimination, it is also necessary to consider the social and cultural dynamics of the workplace. The results indicate that in order to cultivate environments in which transgender individuals are not only legally safeguarded, but also socially and psychologically supported, policymakers and organizations must take into account both formal and informal aspects of workplace discrimination. This model broadens the scope of conventional discrimination research by incorporating the lived experiences of transgender individuals and emphasizing the intricacies of attaining complete inclusion in the workforce.

7.2.3 Differential Impact of Discrimination Models

The identification of distinct impacts of transgender discrimination models between Hungary and Bangladesh is the critical and novel theoretical contribution of this research. The data demonstrate a remarkable disparity in the type of discrimination that transgender individuals encounter in both countries. In Hungary, formal and taste-based discrimination are more prevalent, whereas informal discrimination is significantly more prevalent in Bangladesh. These variations can be ascribed to the distinctive socio-cultural and legislative contexts of each country, which influence the manner in which discrimination is demonstrated in the workplace and beyond. The study underscores the intricacy of transgender discrimination, positing that the obstacles encountered by transgender individuals in each society are significantly influenced by both legal frameworks and cultural attitudes.

Substantial institutional discrimination is experienced by the transgender population in Hungary, primarily as a result of the country's restrictive legislative frameworks. Despite the existence of anti-discrimination laws on paper, the legal environment has become increasingly hostile to transgender individuals, particularly in light of recent modifications to gender recognition laws. The practical barriers to accessing healthcare, housing, and, most notably, employment have been exacerbated by these legal changes, which have made it more challenging for transgender individuals to have their gender identity legally recognized.

Despite the existence of laws that prohibit discrimination, taste-based discrimination, which is motivated by personal biases and societal preconceptions, continues to be prevalent. This form of discrimination, in which employers harbor prejudices or unease toward

transgender individuals, affects the employment process, wage determination, and promotion process. In Hungary, the legal protections that are intended to protect the rights of transgender individuals in the labor market are being undermined by the profoundly engrained societal attitudes and biases against gender non-conformity, which are reflected in the prevalence of taste-based discrimination. This paradox emphasizes the necessity of a more rigorous enforcement of anti-discrimination laws and ongoing endeavors to combat societal attitudes that perpetuate prejudice.

In contrast, Bangladesh presents a distinct yet equally alarming image, in which informal discrimination is significantly more prevalent. In Bangladesh, informal discrimination is defined by behaviors such as harassment, microaggressions, and intimidation, which are present in the daily interactions and social interactions that transgender individuals encounter in the workplace. This form of discrimination is particularly detrimental due to its tendency to be covert, unreported, and largely unregulated. Cultural and religious norms are the foundation of the social stigma and marginalization that transgender individuals, particularly those who identify as *Hijra*, experience.

In the Bangladeshi context, societal prejudices against transgender individuals are evident in daily interactions, where transgender individuals frequently endure exclusion and maltreatment in informal settings, such as public spaces or the workplace. The profound impact of cultural attitudes and social stigmas on the lived experiences of transgender individuals is underscored by the prevalence of informal discrimination in Bangladesh. This often results in psychological distress and a lack of opportunities for personal and professional development. Although legal reforms, including the recognition of the third gender and voting rights, have made some progress in improving the status of transgender individuals, this study indicates that societal attitudes and informal discrimination continue to be significant obstacles to attaining complete social inclusion and equality.

This disparity in impact between the two nations serves as evidence that legal reforms alone are inadequate to eradicate discrimination. The incorporation of transgender individuals in the labor market in Hungary remains impeded by the persistence of prejudices, which are present at both the institutional and individual levels, despite the relatively advanced legal framework. Conversely, Bangladesh's challenge is more prevalent in the social realm, where it is necessary to alter profoundly ingrained cultural norms in order to establish a more inclusive environment. This implies that, in addition to legal frameworks, it is equally important to implement broader social changes, including public education, awareness campaigns, and community-building initiatives, in order to address the systemic discrimination that

transgender individuals encounter. The results of this study indicate the necessity of a multifaceted strategy that integrates legal reforms with cultural and societal changes to establish an environment in which transgender individuals can completely engage in the workforce without fear of discrimination.

7.2.4 *Intersection of Models*

In addition, this dissertation has provided valuable insights into the intersection and overlap of the Classical and Contextual models, indicating that discrimination against transgender individuals is not readily delineated into distinct economic and non-economic categories. The results suggest that the two models frequently intersect in intricate ways, and this reveals the multifaceted nature of discrimination in the workplace. For instance, Hungary and Bangladesh have both encountered discriminatory practices, including intimidation and stereotyping, which can be classified as either informal (social) or statistical (economic) discrimination. Nevertheless, the prevalence and impact of these issues are inconsistent between the two countries, which serves as an illustration of the interconnected and fluid nature of these forms of prejudice. The intersectionality of these approaches underscores the fact that transgender individuals frequently encounter concurrent strata of discrimination that are not easily distinguished into solely economic or social categories.

Statistical discrimination has been frequently observed in Hungary's employment procedures, where employers implicitly perpetuate stereotypes and prejudice regarding transgender individuals. These biases, which are based on preconceived notions about the reliability, professionalism, or capabilities of transgender individuals, contribute to economic disadvantages by causing transgender candidates to be unjustly neglected or underpaid in comparison to their cisgender counterparts. This form of discrimination, which is frequently discreet, can lead to transgender individuals experiencing long-term career stagnation. Additionally, this economic bias is exacerbated by informal harassment in the workplace, which may result in intimidation, exclusion, or negative remarks from colleagues or supervisors. The duality of informal harassment and statistical discrimination in Hungary implies that transgender individuals are not only economically marginalized but also socially marginalized in the workplace. This reinforces the necessity of both structural and cultural changes to address these prejudices.

The intersection of informal discrimination and economic discrimination is particularly pronounced in Bangladesh. The economic opportunities and career advancement of transgender individuals are directly impacted by workplace harassment, microaggressions, and

bullying in Bangladesh, which are not merely isolated forms of social maltreatment. For instance, transgender employees may be denied professional development opportunities, denied access to promotions, or excluded from significant professional networks as a result of persistent social prejudices. The barriers that transgender individuals encounter in procuring stable, formal employment are further exacerbated by the confluence of economic and informal discrimination, which results in their being confined to low-paying or informal work.

The intricate relationship between these two forms of discrimination demonstrates that the cultural and social context in which transgender individuals reside and operate is essential for a comprehensive understanding of economic challenges. In Bangladesh, informal discrimination has substantial economic repercussions for transgender individuals, resulting in a cycle of exclusion that is challenging to break, as cultural stigma and legal ambiguity continue to restrict their rights.

The results of this study underscore the necessity of a multifaceted approach to the prevention of discrimination, which considers both economic and contextual factors. Addressing overt economic discrimination, such as biases in employment and compensation, is essential; however, it is equally important to address the subtler, more pervasive forms of informal discrimination that transgender individuals encounter on a daily basis. Policies and interventions must be developed to address the broader societal biases that contribute to informal discrimination, including workplace bullying, microaggressions, and the stigmatization of transgender individuals in professional environments. In addition, it is imperative to cultivate an inclusive workplace culture that not only acknowledges but also actively promotes gender diversity to guarantee that transgender individuals are not only legally safeguarded but also socially accepted in the workplace. In order to establish an environment in which transgender individuals can engage completely in the labor market without fear of discrimination or exclusion, a comprehensive strategy would necessitate both legal reforms and cultural adjustments.

In general, the complexity of transgender discrimination and the necessity of a comprehensive approach are emphasized by the intersection of economic and contextual discrimination models. In order to guarantee that transgender individuals have equal access to opportunities, protection from harassment, and the capacity to flourish in all facets of their professional lives, legal frameworks must be complemented by cultural and societal transformations. This research elucidates a more direct path for future policies and interventions that are designed to promote inclusive labor markets globally by addressing both the structural and social dimensions of discrimination.

7.2.5 *Non-Discrimination Cases*

A unique and somewhat unexpected finding from this study is that a significant number of individuals in Hungary (18.79%) reported not encountering any form of discrimination, in striking contrast to Bangladesh's relatively low rate of 7.47%. This discrepancy implies that, in certain circumstances, transgender individuals in Hungary may have a slightly more favorable experience in terms of being regarded equally or without bias in the workplace. The prospective impact of Hungary's legal framework is one of the many interpretations of these findings.

Hungary's anti-discrimination laws are relatively more robust than those of Bangladesh, particularly in the realms of public services and employment, despite recent setbacks. Hungary's legal congruence with EU anti-discrimination policies, in conjunction with its membership in the European Union, may have contributed to a broader societal awareness of LGBTQ+ rights, potentially resulting in lower levels of overt discrimination and greater acceptance. A more protective environment for transgender individuals in Hungary may have been established as a result of the combination of legal safeguards, international human rights commitments, and a growing public awareness of gender identity and diversity.

It is important to exercise caution when interpreting this finding, as the percentage of individuals who report no discrimination is higher in Hungary. The persistence of other forms of discrimination, including informal harassment, implicit biases, and unequal opportunities for career advancement, indicates that non-discrimination in Hungary is not necessarily experienced equally across all aspects of employment. Despite the existence of laws that are intended to promote equality, transgender individuals may still encounter challenges related to workplace culture, microaggressions, or issues with gender recognition on official documents. Consequently, Hungary exhibits some encouraging developments; however, there is still much space for improvement, particularly in the area of overcoming the systemic and cultural impediments to full inclusion.

Conversely, the ongoing obstacles that transgender individuals encounter in Bangladesh are underscored by the substantially lower percentage of individuals who report no discrimination (7.47%). The data clearly indicates that Bangladesh must increase its efforts to enhance the overall conditions for transgender individuals. Despite the significant progress made in the legal recognition of the third gender, transgender individuals—particularly those who identify as *Hijra*—continue to face significant social and institutional challenges. The

marginalization of transgender individuals is exacerbated by the persistence of social stigma and the absence of robust anti-discrimination protections in both personal and professional environments. The necessity of enacting legal reforms that not only acknowledge the rights of transgender individuals but also guarantee their meaningful protection and enforcement is underscored by the low percentage of individuals who report receiving no discrimination in Bangladesh. In particular, Bangladesh must concentrate on the development of more robust legal mechanisms to prevent workplace discrimination, provide social services, and cultivate an inclusive and respectful public environment for transgender individuals.

However, the substantial disparity in the reported experiences of discrimination between Hungary and Bangladesh ultimately reveals critical areas for development in both countries. Although Hungary has made some strides in fostering a more tolerant environment for transgender individuals, there are still voids in legal protections and social attitudes that require attention. In the interim, Bangladesh's challenge is to guarantee that legal recognition is followed by significant policy changes, such as the implementation of anti-discrimination laws and a concerted effort to challenge the cultural stigmas that impede transgender individuals' ability to fully participate in the workforce. The results necessitate customized interventions in both countries. Hungary should prioritize the development of stronger legal protections and public education, while Bangladesh should prioritize the combat of deep-seated social prejudices and the enhancement of enforcement mechanisms.

7.2.6 Practical Implications and Future Researcher guideline

The theoretical framework employed in the current thesis has not only addressed the current state of transgender discrimination in the labor markets of Hungary and Bangladesh, but it has also established a critical foundation for future research in this field. Through the application of both the Classical and Contextual models of discrimination, the investigation offers a thorough comprehension of the multifaceted obstacles encountered by transgender individuals. This understanding can be further investigated through longitudinal studies and surveys.

These research methods would enable a more comprehensive analysis of the evolving dynamics of transgender discrimination over time, particularly as societal attitudes and legal reforms evolve. The long-term impact of legal and policy changes could be monitored through longitudinal studies, while surveys could provide more detailed information on the specific experiences of transgender individuals in various industries and sectors. Identifying which areas of discrimination persist despite legal protections and which factors (such as workplace

culture, education, and socio-economic background) continue to influence transgender individuals' ability to succeed in the labor market would be essential.

Additionally, comparative studies that involve additional countries would substantially improve comprehension of the ways in which the labor market experiences of transgender individuals are influenced by a variety of legislative, cultural, and socio-economic contexts. Future research could offer a more comprehensive understanding of the global variations and similarities in transgender discrimination by broadening the scope of the study to encompass countries with varying legal frameworks, cultural attitudes, and economic development. This comparative research would be crucial in the identification of successful policies and strategies from various regions that could be adapted or implemented by other countries that are confronting comparable challenges. This would also facilitate cross-national dialogues on best practices for promoting equality in the workforce and enhance the global understanding of transgender inclusion.

In general, this research has significantly enhanced the theoretical comprehension of transgender discrimination in labor markets. This paper has provided a nuanced perspective on the diverse forms of discrimination that transgender individuals encounter in Hungary and Bangladesh by incorporating the Classical and Contextual models. This analysis provides policymakers, researchers, and advocates with valuable insights that can be used to establish more inclusive and equitable labor markets. It emphasizes the necessity of comprehensive legal protections, social programs, and public awareness campaigns to resolve the distinctive challenges encountered by transgender individuals in both countries.

As well, the research highlights the significance of bridging the gaps between the laws that are supposed to be implemented and the laws that are actually implemented in practice. Legal frameworks may, on paper, provide safeguards; nevertheless, the actual execution of these laws and the cultural acceptance of these laws frequently remain restricted. In the future, research may concentrate on determining whether or not the present legal frameworks are successful in ensuring that transgender people are included in the workforce and investigating the obstacles that hinder these laws from being fully implemented.

Even when legal safeguards are in place, there is still a compelling need to address the larger social attitudes and prejudices that continue to impede the ability of transgender persons to thrive in the job market. Therefore, it is imperative that this issue be addressed. By conducting this research, a crucial foundation has been formed for future investigations into the work rights of transgender individuals and the design of policies that encourage their complete integration into all aspects of economic and social life. Future researchers and

policymakers have the ability to contribute to the development of a labor market that is more welcoming, equitable, and supportive of transgender persons all around the world if they continue to build on this body of work.

7.3 Policy Implications

The analysis of the job experiences of transgender persons in Hungary and Bangladesh has resulted in the discovery of several significant policy implications. There are major obstacles that transgender persons in both countries must overcome in order to improve their quality of life and get respectable employment opportunities. Therefore, it is necessary to understand these effects in order to develop policies and programs that are more inclusive.

Firstly, identifying enhanced legal safeguards and enforcement tools as necessary. There is a strong demand in Bangladesh for comprehensive legislative safeguards that are expressly designed to protect transgender individuals. The inclusion of comprehensive anti-discrimination laws, explicit legal acknowledgment of transgender identities, and robust enforcement measures to safeguard against police and societal harassment should have been part of this. Mandatory training programs should have been implemented to ensure the effective enforcement of transgender rights and promote sensitivity among law enforcement officials. In Hungary, although legal safeguards have been in place, there has been a notable deficiency in their implementation. Enhancing the capabilities of organizations such as the Directorate-General for Equal Treatment and establishing unambiguous channels for legal action against discrimination have been of utmost importance. Furthermore, it is necessary to reevaluate the current laws that impose restrictions on gender recognition to conform to international human rights norms.

Secondly, important policy consequence has been the encouragement of formal employment prospects. For instance, Bangladesh's policy should have concentrated on establishing inclusive employment possibilities in the formal sector. This should have included rewarding both public and private organizations to hire transgender people while also maintaining workplace discrimination protections. Vocational training initiatives customized to transgender people could have helped close the skill gap and promote economic inclusion. In Hungary, efforts could have been made to develop an inclusive workplace culture by mandating diversity and inclusion training for all workers. Employers should have been urged to create and execute comprehensive nondiscrimination policies, as well as to give transgender employees with support systems such as counseling and peer support groups.

Thirdly, the elimination of social stigma and prejudice against transgender persons has led to the implementation of awareness and sensitization initiatives, which have been extremely important. Humanizing transgender people, highlighting the contributions they make to society, and advocating respect for their rights should have been the primary focus of public awareness campaigns in both nations. These efforts may have been bolstered and a more welcoming social atmosphere might have been established if they had been carried out in conjunction with the media, educational institutions, and civil society groups.

Fourthly, international organizations have had major policy consequence. In Bangladesh, there was a need to raise knowledge about international organizations such as UNICEF and UNDP. These groups would have played a critical role in providing technical assistance, money, and campaigning to support legal reforms and social inclusion measures for trans people. In Hungary, using the influence of international institutions such as the ILO and the European Court of Human Rights may have helped hold the national government accountable and advocate for the enforcement of existing rights. These organizations could have also served as platforms for exchanging best practices and encouraging cross-border collaboration.

Finally, research and data collection have been critical for informed policymaking. In both nations, consistent data collecting on transgender people's employment statuses and experiences has been essential. Governments should have worked with academic institutions and non-governmental organizations to conduct thorough investigations and surveys. This information might have helped determine gaps, examine the impact of policies, and ensure that transgender people's needs are taken care of adequately. Overall, transgender people in Hungary and Bangladesh may have achieved great advances toward a more equal and supportive workplace if these policy consequences had been addressed. To guarantee that transgender people are fully included in all parts of society and the economy, it has been crucial to implement thorough legal reforms, educate the public, and work together on a global scale.

8 Conclusion

This dissertation has undertaken a rigorous, interdisciplinary, and empirically grounded socio-legal inquiry into the structural exclusion of transgender individuals from the labor markets of two markedly different national contexts: Hungary and Bangladesh. The study sought to interrogate the interplay between legal frameworks, policy environments, and the lived realities of transgender individuals, with the objective of evaluating the capacity— or lack thereof—of

legal systems to function as instruments of labor inclusion. Through a comparative methodological approach, qualitative fieldwork, and engagement with both international and domestic legal instruments, the research endeavored to illuminate persistent patterns of marginalization and critically assess the efficacy and limitations of existing legal regimes.

The research was motivated by a growing recognition that prevailing legal architectures often inadequately reflect or respond to the complexities of gender diversity, particularly within employment contexts. By selecting Hungary and Bangladesh—jurisdictions that diverge significantly in legal tradition, political systems, and economic conditions—the study employed a “most different systems” comparative framework to expose structural commonalities in the exclusion of transgender individuals. This methodological choice enabled both a contextualized understanding of localized legal-political dynamics and the identification of broader, transnational patterns of labor market exclusion.

A principal finding of this inquiry is that legal recognition of transgender identities in both jurisdictions—whether through prior gender recognition laws in Hungary or administrative third-gender classification in Bangladesh—has remained largely symbolic. These measures, while seemingly progressive, have not been accompanied by comprehensive legal protections, inclusive employment policies, or robust institutional accountability mechanisms. Consequently, the formal recognition of gender diversity has failed to disrupt entrenched structures of economic marginalization, social stigma, and bureaucratic invisibility.

Empirical evidence, based on 46 interviews with transgender individuals and relevant stakeholders, consistently pointed to experiences of discrimination in hiring processes, workplace harassment, and difficulties in accessing gender-affirming documentation. Such barriers create a self-perpetuating cycle of exclusion, pushing individuals into informal or precarious labor markets and disincentivizing engagement with formal legal mechanisms. Rather than serving as a source of protection, legal and administrative institutions were often perceived as instruments of surveillance, control, or exclusion.

In Hungary, the revocation of legal gender recognition rights has contributed to an institutionalization of transphobia, while in Bangladesh, the operationalization of third-gender recognition remains inconsistent, stigmatized, and administratively opaque. In both contexts, legal ambiguity, inconsistent implementation, and systemic hostility have reinforced patterns of exclusion and undermined trust in public institutions.

This dissertation also offers a critical appraisal of international labor law instruments, specifically ILO Conventions No. 100 and 111. While these conventions have established foundational norms against workplace discrimination, their efficacy in protecting transgender

and non-binary individuals remains limited. The reliance on binary understandings of sex and the absence of explicit references to gender identity constrain their interpretive reach. Although the CEACR has encouraged inclusive interpretations of “sex,” such recommendations lack binding force and are inconsistently implemented across jurisdictions.

This limitation underscores a broader issue within international legal frameworks: the gap between normative aspiration and enforceable specificity. Convention No. 100’s emphasis on equal remuneration for “men and women” fails to capture the wage disparities and access barriers encountered by individuals outside the gender binary. Similarly, Convention No. 111’s general prohibition against discrimination is insufficiently precise to guarantee protection for gender-diverse workers in practice.

A notable contribution of this research lies in its methodological orientation. By centering the lived experiences of transgender individuals and embedding legal analysis within those narratives, the study adopts a socio-legal perspective that reveals the disjunction between law as codified and law as experienced. This approach aligns with scholarly traditions that critique the formalism of legal systems and advocate for people-centered jurisprudence—one that is attentive to how marginalized communities interpret, navigate, and contest legal regimes.

While the dissertation provides a rich qualitative account, it acknowledges certain limitations. It does not offer an exhaustive doctrinal analysis of all relevant statutes, nor does it engage in an extended philosophical examination of the human rights dimensions of transgender labor inclusion. These exclusions were deliberate, allowing the research to remain grounded in fieldwork and empirical observation. Nevertheless, the findings point to the need for future scholarship to explore the ontological and normative debates surrounding legal personhood, the universality of human rights, and the theoretical foundations of transgender rights.

In light of the empirical and theoretical insights generated, the dissertation proposes a series of legal and policy recommendations aimed at mitigating transgender labor market exclusion:

- *Legal Reform:* Amend anti-discrimination and labor legislation to explicitly include gender identity and gender expression as protected categories.
- *Administrative Inclusion:* Revise identity documentation systems to ensure accessibility, clarity, and alignment with self-identified gender markers.

- *Institutional Accountability*: Establish specialized and adequately resourced complaints mechanisms within labor and human rights bodies to address transgender-specific grievances.
- *Capacity Building*: Implement targeted legal and human rights training for employers, labor inspectors, and public service providers to foster inclusive institutional practices.
- *International Norm Development*: Advocate for the revision and expansion of international legal instruments, particularly ILO conventions, to explicitly incorporate protections for gender-diverse individuals.

These recommendations are not merely aspirational; they are grounded in the lived realities articulated by research participants and aligned with established human rights principles. They also represent a shift from diagnostic critique toward prescriptive intervention, with the aim of informing future policy, advocacy, and legal reform.

In its comparative dimension, the study challenges deterministic assumptions about legal progress. Hungary, despite its status as a European Union member state with relatively advanced legal infrastructure, illustrates how rights can be eroded under regressive political ideologies. Conversely, Bangladesh, often characterized as legally underdeveloped, demonstrates symbolic openness to gender diversity. Yet in both jurisdictions, the absence of enforceable rights and institutional commitment results in parallel outcomes of exclusion. This finding underscores the necessity of moving beyond legal formalism to consider the practical operation of legal norms and institutions.

Theoretically, the dissertation advances critical legal scholarship by conceptualizing law as a lived and mediated institution—shaped by access, institutional culture, and individual experience. It contributes to feminist legal theory, queer theory, and postcolonial legal studies by providing a grounded case study of how legal regimes may simultaneously offer the promise of inclusion while perpetuating marginalization.

A central insight of this research is that labor inclusion must be recognized as a human rights imperative, rather than a secondary concern of economic development or administrative efficiency. Employment is not merely a vehicle for income generation; it is a conduit for dignity, societal recognition, and political participation. For transgender individuals, exclusion from formal labor markets entrenches broader patterns of social and legal disenfranchisement. Ensuring equitable access to decent work is, therefore, integral to the realization of fundamental human rights.

In sum, this dissertation contends that the exclusion of transgender individuals from labor markets is not incidental but structurally embedded within legal, institutional, and cultural systems that fail to recognize gender diversity as a legitimate and protected category of identity. Addressing this exclusion requires more than piecemeal legal amendments; it demands a paradigmatic shift in how law, identity, and justice are conceptualized and operationalized.

The contributions of this research are threefold: it offers an empirically substantiated critique of current labor and legal systems; it enriches socio-legal theory by prioritizing lived experience; and it sets forth actionable recommendations for policy and legal reform. By integrating comparative legal analysis with qualitative inquiry, the dissertation exemplifies a model of interdisciplinary scholarship that is both critical in its analysis and constructive in its vision.

In light of these discoveries, future research should concentrate on longitudinal studies that monitor the employment outcomes of transgender individuals in response to legal reforms and social programs. Researchers can gain a more comprehensive understanding of the long-term effects of legislative and societal changes, as well as the specific requirements and challenges encountered by transgender individuals in the workplace, by accumulating more detailed quantitative and qualitative data.

It would also be advantageous to investigate the intersectionality of transgender experiences, which involves the examination of how factors such as age, ethnicity, and socio-economic status intersect with gender identity to influence employment outcomes. Furthermore, comparative studies conducted in various cultural contexts would offer valuable insights into the global successes and challenges associated with the promotion of transgender rights and labor market inclusion. In the end, policymakers, scholars, and activists can collaborate to establish more inclusive, equitable labor markets that acknowledge and maintain the rights and dignity of transgender individuals worldwide by continuing to expand upon this research.

Overall, this study affirms that transgender individuals are not merely passive subjects of legal vulnerability, but active agents of legal and social transformation. Their experiences and demands must inform the evolution of labor law, human rights discourse, and institutional practice. Until transgender persons are fully recognized and protected as equal participants in the labor force, the global commitment to “decent work for all” will remain an aspirational ideal rather than a realized right. This dissertation represents one contribution toward realizing that commitment.

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Appendix I- Interview guidelines

A non-structured interview guideline on
**Challenge of transgender involvement in labor force: a comparative study between
Hungary and Bangladesh**

[This interview is completely confidential; no one will ever know your identity. Your answers will be used solely for academic purpose. It is hoped that the knowledge could be used to increase understanding of the transgender challenges in labor economy in Bangladesh.]

Serial Number: /...../..... Date

1. Tell me about yourself (Descriptive information)
 - i. Name:
 - ii. Age:
 - iii. Sex:
 - iv. Religion:
 - v. Educational status:
 - vi. Housing structure:
 - vii. Occupation:
 - viii. Occupational position
2. Please tell us something about your job.
3. How do you feel in this working position? [Do you like to work what you are doing now?] Please explain...
4. How you able to secure/get this job? Please explain...
5. What kind of challenges you have faced to get this position? Please explain...
6. What kind of challenges you are facing now or after getting this job? Please explain...
7. What are the common types of discrimination you have experienced?
8. What are the common types of discrimination you have seen experiencing by other transgender?
9. Do you think because of your gender/sexual identity you are facing discrimination in your personal and professional life? Please explain...
10. Did you have taken any steps against this discrimination? How? Was it legal or social? What was that? Please explain...
11. As a citizen of your nation do you know what kind of rights you have? If no, did you ever try? If yes, how you know that? Please explain...

12. Can you please tell me what kind of laws [local, national, international] are there to protect your rights [labor and civil rights]? Do you know, if there are any law and policy to protect your labor right and civil right? Please explain...
13. Do you know what kind of possible legal aids for harassment or discrimination are available in your country?
14. Do they have experience in witnessing others being discriminated against?
15. Do you know about ILO? What they do? And what kind of steps they have taken for you to secure your employment? Please explain...
16. Do you think you are getting similar access to other binary people in your employment? If yes then how or if no then why? Please explain...
17. Tell me something more about it...