

Critical Analysis of the Surrogacy Regulation Bill, 2016

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Abstract:- Surrogacy means to carry the baby of another intending couple till its delivery. A surrogate mother is one who carries the child till pregnancy with the help of assisted reproduction techniques.

The Surrogacy Regulation Bill, 2016 is to regulate the growing hub of commercial surrogacy in India. It has been passed in the Lok Sabha but is still pending in the Rajya Sabha. This Bill aims to prevent exploitation of poor women acting as surrogates and encourages the practice of adoption in the country by prohibiting many couples to undergo surrogacy. Although, this Bill is not free of flaws and has many loopholes. Banning Commercial Surrogacy, allowing only close relative to be the surrogate, not extending to homosexuals, live-in relationships and so on are a few loopholes of this Bill. Banning Commercial Surrogacy is not a solution to the problem being faced by India, regulating it and helping prevent a black market is.

I. INTRODUCTION

Surrogate means “substitute” which implies that the surrogate mother is the substitute if the intending mother cannot carry the baby due to some reasons. Surrogate mother is the biological mother of the surrogate child but she does not have any rights over the child after birth as the rights are then vested in the intending couple.

15% of the people are infertile in the country. Therefore, measures are required to combat the situation of infertility. Surrogacy is one of the measures¹.

Surrogacy can be seeked or undertaken by couples when either of them is infertile, when there is some medical or physical condition maybe any rare or unnatural pregnancy risks involved.

There are two types of surrogacy- Altruistic Surrogacy and Commercial Surrogacy².

Altruistic Surrogacy is where no monetary benefits are being given to the surrogate mother from the intending couple. Only the medical expenses of the surrogate mother are to be covered by the intending couple. Mostly in these cases, close relative people are taking the girls to boys.

Commercial Surrogacy is where monetary benefits have been pre-determined by the intending couple and the surrogate mother³.

II. RESEARCH QUESTIONS

- How did the surrogacy laws evolve in India?
- What are the regulations provided by the Surrogacy Regulation Bill, 2016?
- Is the bill able to curb all the problems related to surrogacy in India?

III. RESEARCH METHODOLOGY

Doctrinal method of research has been used for this research paper. I have referred to Secondary data, like books, articles, journals, newspaper articles, online databases (Manupatra, SCC online, and Jstor), online materials etc. and Primary sources such as case laws and the Surrogacy Regulation Bill, 2016.

IV. SCOPE OF STUDY

Surrogacy is one of the burning topics in India. I have selected to analyze this Bill to know the problems that can arise after the enactment of the Bill. I have critically analyzed it in respect to the problems that can be faced in India. Legalization of commercial surrogacy has made India a hub for foreigners which lead to exploitation of women. Therefore, this Bill prevents the ill-treatment of Indian Surrogates. So, I have chosen this topic to find the loopholes in the bill drafted by the Legislature.

V. SURROGACY IN INDIA

- *Evolution of Surrogacy laws:*

Surrogate arrangements were not quite spoken about, they were kept in a quiet setting and it did not have any legally binding document. It remained silent until 1976 when the first surrogacy agreement was put to place. Then, in 1980, contracts began to emerge for the purpose of surrogacy with an established compensation.

The history of surrogacy changed rapidly when the first successful IVF embryo transfer baby, Louis Brown was born in 1978⁴.

¹ (March 10, 2020, 5pm),<https://www.prsindia.org>

² Dev, Surrogacy in India, (March 11, 2020, 5pm),<https://www.legalservicesindia.com>

³ (March 10, 2020, 5pm),<https://www.prsindia.org>

⁴ Swaniti Initiative, The Surrogacy Regulation Bill, 2016, (March 12, 2020, 7pm), <https://www.swaniti.com>

➤ *Evolution in India:*

Commercial surrogacy was legalized in India in 2002. It landed a lot of commercial firms claiming to be specialized in surrogacy, assisting foreign tourists who came to search for cheaper wombs for the purpose of surrogacy which was fulfilled by the Indian woman. This exploited the Indian poor women who for a living sell their wombs. They were ill-treated and their dignity of their reproductive capacities was also hurt. The probability of more foreign countries coming for the purpose of surrogacy increased. India became a hub of commercial surrogacy⁵.

Anand village of Gujarat has become a hub of commercial surrogacy. Gujaratis staying in different parts of the world go to this village for the purpose of surrogacy. All the non-resident Gujaratis come to this place for medical visits making it a center for commercial surrogacy. At the Hope Maternity Clinic at Anand village, Gujarat, the proportion of foreigners clearly indicated the flood of tourists coming in for surrogacy⁶.

Therefore, it was necessary for laws to evolve considering surrogacy and preventing India from becoming a hub of commercial surrogacy. It was recommended by the 228th Law Commission report to prohibit commercial surrogacy and only allow altruistic surrogacy along with an enacting suitable legislation.

• *Baby Manji Yamada V Union of India, 2009*⁷:

An Indian lady became a surrogate mother for a Japanese couple. The couple separated before one month of the birth of the surrogate baby. Ikufumi Yamada who was the biological father of the surrogate baby wished to take the baby back with him to Japan but there were no provisions as such in law which could govern such a situation. Japanese government did not permit the baby to Japan as well. Therefore, when no conclusions could be drawn the Supreme Court of India intervened in the matter and finally the surrogate baby was sent to Japan with her grandmother, Emika Yamada. This case aroused the government to enact a law regulating surrogacy.

• *Jan Balaz V Anand Municipality*⁸:

An Indian surrogate mother gave birth to twin babies, Nikola and Leonardo, in the Akansha Fertility Clinic in January, 2008 for a German couple. She was the donor of egg for the twin babies. The question of nationality of the kids was raised as citizenship was not granted from Germany as the law prevailing there did not recognize surrogacy as a manner of parenthood. Jan Balaz filed a petition for the grant of Indian passports to the twins which

was rejected as they were not the citizens of this country. Considering the situation as an exceptional one where a certificate of identity can be granted, Court ordered for granting passports to the twins. However, since dual partnership is not valid in India, they were granted Overseas Indian Passports⁹.

All these incidents finally made an arousing situation to ban surrogacy allowed for the foreigners who came in search of cheap surrogate mothers to India.

VI. THE SURROGACY REGULATION BILL, 2016 PROVIDES FOR THE VARIOUS REGULATIONS

The Bill allows only altruistic surrogacy. No monetary benefits can be given to the surrogate mother of the child. Only the medical expenses of the surrogate mother during the pregnancy should be taken care by the intending couple.

Surrogacy is permitted for couples only when-

- They are proven infertile.
- They undergo altruistic surrogacy.
- Surrogacy is not for any commercial purposes.
- Children are not produced for prostitution rackets or exploitation.
- Couple is undergoing surrogacy because either of them suffers from any medical condition given in the regulations¹⁰.

➤ *Eligibility Criteria:*

- Eligibility Criteria for both the surrogate mother and the couple should be met.
- “Certificate of Essentiality” and a “Certificate of Eligibility” is required by the intending couple which is issued by an appropriate authority¹¹.
- A “Certificate of Eligibility” is also required by the surrogate mother.
- The intending couple is issued the “Certificate of Essentiality” only when the following conditions are met:
 - ✓ Either one or both of them are proven infertile.
 - ✓ They have an order from the Magistrate’s court regarding the parentage or custody of a child born out of surrogacy.
 - ✓ They will provide for insurance coverage of the surrogate mother.
- The “Certificate of Eligibility” is issued to the intending couple only when they fulfill the following conditions required:
 - ✓ Both should be Indian citizens.
 - ✓ They should have been married for at least 5 years.
 - ✓ They should not have any child of their own, but surrogacy is allowed in case their own child is suffering

⁵ PIB Delhi, Cabinet approves moving official amendment in the Surrogacy Regulation Bill, 2016, (March 14, 2020, 7 am), <https://pib.gov.in>

⁶ Amrita Pande, Surrogacy in India, Vol. 35, No.4, University of Chicago Press Journals, (March 11, 2020, 4am), <https://www.jstor.org/stable/10.1086/651043>

⁷ (2008), 13 SCC 518

⁸ Legalcrystal.com/747551

⁹ (March 11, 2020, 4am), <https://www.legalcrystal.com>

¹⁰ S.S Das, Commercialization of Surrogacy in India, (March 12, 2020, 9:30pm), <https://www.researchgate.net>

¹¹ (March 10, 2020, 5pm), <https://www.prsindia.org>

from some physical or mental impairment or some life-threatening disease or disorder or some other conditions which is or will be specified by the regulations.

- ✓ Women should be between 23-50 years of age.
- ✓ Men should be between 26-55 years of age.
- The surrogate mother is given a “Certificate of Eligibility” only when she fulfills the following conditions:
 - ✓ Surrogate mother should be between 25-35 years of age.
 - ✓ She should be a close relative of the intending couple.
 - ✓ She should be married and should have a child of her own.
 - ✓ She should not have been a surrogate mother before¹².

➤ *Abortion of the Surrogate Child:*

The abortion of the surrogate child needs the consent of the surrogate mother and the appropriate authorities’ authorization which will be in compliance with the Medical Termination of Pregnancy Act, 1971. The surrogate child is deemed to be the biological child of the intending couple¹³.

➤ *Appropriate Authorities in Surrogacy Regulation Bill, 2016:*

These appropriate authorities are established by the Central government and the State government. It comprises of the Joint Director of the state Health Department, medical practitioner, a State Law Department officer and an eminent women¹⁴.

The appropriate authorities will look into the complaints regarding the breach of any of the laws or regulations mentioned in the Bill. They will be responsible for granting, cancelling or suspending the licenses of the various surrogacy clinics. They are even responsible to set the standard of the surrogacy clinics in India¹⁵.

No surrogacy clinics will be allowed to perform surrogacy without license from the appropriate authorities. Surrogacy clinics will not be allowed to store human embryo or gametes in their clinics for future purposes.

As soon as the appropriate authorities are appointed, the various clinics performing surrogacy can send their applications for license within a period of 60 days and the application can be accepted or rejected within 90 days¹⁶.

➤ *Offences and Penalties for non-compliance:*

In case commercial surrogacy is performed by any licensed or unlicensed surrogacy clinic, commercial surrogacy is advertised by the clinics, clinics have storage of human embryo or gamete for future or are involved in

¹² (March 10,2020,5pm), <https://www.prsindia.org>

¹³ Prassanna Mohanty, The Surrogacy (Regulation) Bill,2016- A casual approach to a serious problem, (March 13, 2020, 6am), <https://www.businesstoday.in>

¹⁴ Department of Health Research, (March 13, 2020, 7pm), <https://dhr.gov.in>

¹⁵ (March 9, 2020, 6am), <https://www.boomlive.in>

¹⁶ S.S Das, Commercialization of Surrogacy in India, (March 12, 2020, 9:30pm), <https://www.researchgate.net>

selling of the embryo or gamete or the surrogate mother is exploited or ill-treated, fines and penalties can be imposed on the non-compliers.

The fine and penalty can be imprisonment for 10 years or a fine up to 10 lakh rupees¹⁷.

➤ *Surrogacy Boards:*

There are provisions for National and State Surrogacy Boards according to the Surrogacy Regulation Bill, 2016.

The Central government forms a part of the National Surrogacy Board. The State government forms a part of the State Surrogacy Board.

The National Surrogacy Board acts as a supervisor to the functions performed by the State Surrogacy Boards. It acts as an advisory body advising the Central Government regarding the various policies on surrogacy. It even sets a standard of the code of conduct of the surrogacy clinics¹⁸.

The State Surrogacy Boards are responsible for reviewing the performance of the appropriate authorities that are established at the State levels or in the various Union Territories.

They are even responsible to observe and implement the various provisions of the Surrogacy Regulation Bill, 2016¹⁹.

VII. IS THE BILL ABLE TO CURB THE PROBLEMS OF SURROGACY

The Surrogacy Regulation Bill, 2016 was to curb India from becoming the hub of commercial surrogacy. This Bill aims at improving the conditions of surrogate mothers. It prevents them from being exploited and ill-treated and also preventing them to sell their wombs. It puts a blanket ban on commercial surrogacy and therefore no surrogacy done for commercial or monetary purposes can be undertaken. It encourages adoption among the couples of India as it denies the right to surrogacy to many couples. The Surrogacy Regulation Bill, 2016, however, is not able to prove an absolute law for surrogacy in India because:

➤ *Complete Ban on Commercial Surrogacy:*

The Bill puts a complete ban on the commercial surrogacy. It is intended to put a stop to the exploitation and ill-treatment of the surrogate mothers. It is to prevent them from selling their wombs for money. It aims to prevent the foreigners to come to India for the purpose of surrogacy because of the availability of the cheap surrogate mothers. But a complete ban increases its risk to go to black market. It can lead to a situation where the surrogate mothers are not selling but giving away their wombs because of the poor and devastated condition. The Bill aims to encourage adoption among the couples but every couple

¹⁷ <https://www.legallyindia.com>

¹⁸ (March 10, 2020, 5pm), <https://www.prsindia.org>

¹⁹ (March 9, 2020, 7pm), <https://currentaffairs.gktoday.in>

has a right to choose their own mode of parenthood and therefore their rights cannot be violated. Even after putting a complete ban on the pre natal diagnostic test of babies inside wombs, still it is prevalent and has become a black market business. Similarly, putting a complete ban on commercial surrogacy does not lead to its invincibility but leads to the path of black marketing business. It would increase the risk of the surrogate mothers being exploited more and their conditions being taken more advantage of²⁰.

➤ *Surrogacy allowed only once:*

There are many women who earn money by selling their wombs. It is their source of income. Since every Indian citizen has a right to choose their own profession, trade, this should not be discouraged as there maybe woman who agree to become a surrogate mother by choice and that maybe their bread and butter. After the ban on commercial surrogacy, these practices will be done secretly in a private setting which will make women more vulnerable to exploitation and ill-treatment. Surrogate mothers are usually from the economically and financially weaker section of the society. Therefore, banning does not help their situation. The right to health of the women should be protected as well by ensuring that there is a gap of 3-5 years between each surrogacy as pregnancy leads to damaging various body parts and there should be a good gap between two pregnancies. Therefore, it should not be banned but effectively regulated²¹.

➤ *Violative of Article 14 and 21:*

The Surrogacy Regulation Bill violates the Article 14 of the Indian Constitution. Article 14 establishes equality before law. In this bill, there is discrimination in undertaking surrogacy based on age, nationality, marital status and the sexual orientation.

The age for the male and female have been specified in the Bill and therefore any other willing to have a surrogate baby but not within the prescribed age is not eligible for surrogacy. The female should be between 23-50 years of age and male should be within 26-55 years of age. Therefore, anybody outside this age limit cannot undergo surrogacy.

According to this bill, only Indian couples are eligible for surrogacy. No foreign couples can perform surrogacy in India. It is mentioned in the bill that only couples who are married for at least five years can go for surrogacy. This means that any couple in a live in relationship is not included. Therefore, it discriminates their rights guaranteed by Article 14²².

²⁰ Diksha Munjal, Journal of the Indian Law Institute, Vol 58, No.3, (March 10, 2020, 6am), <https://www.jstor.org/stable/45163396>

²¹ Prabhanjan Kumar Singh, Critical Evaluation of the Draft Surrogacy Regulation Bill, Jamia law journal, 2017, Pg 160-161

²² Saba, Emerging laws of Surrogacy,(March 8, 2020, 6pm), <https://www.sconline.com>

Every couple has a right to choose their own mode of parenthood and a right to procreate, and therefore by denying the right to surrogacy to these couples, Article 21 is violated²³.

➤ *Close Relative:*

The term “close relative” has not been clearly defined in the Surrogacy Regulation Bill, 2016. Therefore, there can be problems in establishing who a close relative can actually be. There is a lack of clarity in the Bill when it comes to understanding the term “close relative”. There are different definitions for close relative in different Acts. For example- Close relative can be a near relative(spouse, son, daughter and so on) according to the Transplantation of Human organs and tissues Act, 1994 but relative means the members of the Hindu Undivided Family or a husband and wife or any other relations as prescribed by the Companies Act, 2013.

The close relative can even be the egg donor of the surrogate baby. In case of any problems in the intending female, the close relative acting as the surrogate mother can donate her egg to the couple. It contradicts with the Indian Council of Medical Research guidelines of 2005 which prohibits the donation of egg. Only a close relative can be a surrogate mother and in case she is a close relative of the male in the couple, be it his sister, it can lead to rare genital congenital anomalies. WHO stated that when there is a blood relation between the parents, the possibility of genital congenital anomalies increases²⁴.

➤ *Not extended to Live-in relationships and Single parent:*

An essential for conducting surrogacy is that the couple should be married for at least five years which automatically bars the couples in a live-in relationship and also of any intending single parent.

The female in a live-in relationship has the same rights as that of a married women in Domestic Violence Act and in many other Acts, but she is not granted the right to surrogacy which is a discrimination. It is usually claimed that a live-in relationship is more prone to separation of the partners but this is witnessed even in the case of marriages²⁵. There are numerous number of divorces happening every single day which shows that marriage does not make the relationship stronger. Therefore, the live-in relationship couples cannot be denied their rights on account of vulnerability to separation. The test applied for the eligibility of a married couple can also be applied for a couple in a live-in relationship and then it can be decided accordingly. But outright denial to the live-in relationship couples is a violation of their rights and is not acceptable²⁶.

²³ Reena Devi Chandel, surrogacy for women in India, (March 12, 2020, 4pm), <https://www.researchtrend.net>

²⁴ (March 9th, 2020, 7am), <https://www.jstor.org>

²⁵ Radhika Nipadkar and Sailee Pansare, Exploring the Draft Surrogacy(Regulation) Bill 2016, Legal Education in Contemporary era, 2018, Pg 9-11

²⁶ (March 10th, 2020, 5pm), <https://blogs.lse.ac.uk>

Similarly, single parent also cannot undergo surrogacy. Many women raise their children without their father, they are as good as the other children having both the parents, therefore, surrogacy should not be denied on this ground. Single parent, be it a man or a woman, should have the right to surrogacy. Many women die after they deliver and those children are in many cases raised alone by their father which indeed shows that a father alone has the capability to raise a child²⁷.

➤ *Extends only to Heterosexual couples:*

Surrogacy is allowed only to a heterosexual couple which is a male and female and denies the right to surrogacy to all other couples. Homosexual couples and the transgender have been denied the right to surrogacy. Indian government has recognized the LGBT community and their rights but their rights are still silent when it comes to surrogacy. They are denied to have a baby through surrogacy. This community is not empowered to have a child by the natural manner and therefore one of the best options for them to have a child is surrogacy. Surrogacy rights should not be dependent on the sexual orientation of the intending couple²⁸. Sexual orientation does not define how good parents the couple can be. The Government is taking efforts to empower this community, therefore, the right to surrogacy should also be given for the betterment of this community. Every couple has the right to parenthood which should not be discriminated on the basis of the couple's sexual orientation. It is proven fact that homosexuals are equivalently good parents and are as effective as the heterosexual couples in raising a child. Therefore, homosexuals should have full right to surrogacy²⁹.

➤ *Intending Couple has no say in abortion of child:*

As per the Surrogacy Regulation Bill, 2016, for abortion of the surrogate child, a written consent of the surrogate mother carrying the child and the authorization of the appropriate authorities are required. The intending couple has no role to play in the abortion of the surrogate baby. It is a loophole in the bill because after the birth of the child, the intending couple will have all the rights over the child³⁰. No rights of the surrogate mother will prevail over the surrogate child. Therefore their consent is also required because at the end, the surrogate child will be the responsibility of the intending couple. If the child in the womb suffers from some disorder and the intending couple is not willing to have the baby but the surrogate mother refuses to abort the baby, it can lead the child's future in sheer darkness. The intending couple should be given a say in abortion of the surrogate baby because it is the responsibility of the intending couple to raise the child and

not the surrogate mother. It does not mean that there should be denial of a say to the surrogate mother, her consent should be important to prevent her from exploitation or any ill-treatment but the absolute rights should not be vested in³¹.

➤ *Storage of Gametes and Embryo is prohibited:*

Indian Council of Medical Research had given the guidelines that gametes and embryos can be stored in clinics for a period of five years. However, the Surrogacy Regulation Bill, 2016, denies the storage of gametes and embryos in clinics. This affects the health of the intending mother. Intending mother has to go through severe stimulation for the extraction of eggs for the transplantation. The rate of success of transplantation is 30%. Repeated stimulation can even lead to OOHs which is Ovarian Hyper stimulation Syndrome which can even lead to blood clots and kidney failure to the intending women. Therefore, gametes and embryos are stored in the clinics to help in transplantation in case the egg of the intending mother fail. Therefore, clinics should be allowed to store some amount of gametes and embryos for the betterment but it should be continuously regulated to prevent it from becoming a business of importing gametes and embryos outside India for monetary purposes³².

VIII. CONCLUSION AND SUGGESTION

Therefore, the Surrogacy Regulation Bill, 2016 helps prevent India from becoming a hub of commercial surrogacy. However, it is not absolute to remove all the difficulties faced during surrogacy. Commercial Surrogacy should not be completely banned in India but it should be effectively regulated for the welfare of the entire country³³. It should be ensured that the expenses incurred by the surrogate mother after the delivery of the baby should also be covered by the intending couple as the money earned by her through surrogacy goes in treating herself after the delivery. This is a violation of her rights. Homosexuals should be given the right to surrogacy. The right to surrogacy should not be denied to couples in a live-in relationship or a single parent. India guarantees right to equality under Article 14 and so it should be applied in surrogacy as well. The health of the surrogate mothers should be of paramount importance, there should be laws governing a gap of three to five years in consecutive pregnancies of the surrogate mothers. Therefore, effective regulation of the law is the only solution to the problems of surrogacy.

²⁷ S.S Das, Commercialization of Surrogacy in India, (March 12, 2020, 9:30pm), <https://www.researchgate.net>

²⁸ Prabhanjan Kumar Singh, Critical Evaluation of the Draft Surrogacy Regulation Bill, *Jamia Law Journal*, 2017, Pg 164-165

²⁹ Saba, Emerging laws of Surrogacy in India, (march 8, 2020, 6pm), <https://www.sconline.com>

³⁰ (March 14, 2020, 8am), <https://www.jstor.org>

³¹ (March 6, 2020, 7pm), <https://indianexpress.com>

³² (March 10, 2020, 5pm), <https://www.prsindia.com>

³³ Prabhanjan Kumar Singh, Critical Evaluation of the Draft Surrogacy Regulation Bill, *Jamia law journal*, 2017, Pg 159-160

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