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DISAGGREGATION OF GENDER AND SEX

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INTRODUCTION

Sex discrimination refers to unequal or unfair treatment based on a person's sex or gender identity. It involves behaviors and attitudes that negatively impact an individual due to their sex or gender nonconformity. Historically, discrimination against women has been the most prevalent form of sex discrimination.

Natural law² philosophy provides a theoretical framework to understand and evaluate issues of sex discrimination. Natural law is based on the idea that there are objective moral truths knowable through human reason³. Classical natural law theorists like Aquinas⁴ argued there is a "natural order" to the world that reason can discern. This order includes the inherent dignity and equal worth of all human beings. Therefore, discrimination of any kind that violates human equality and dignity could be seen as contravening natural law.

Contemporary scholars have applied natural law principles to debates around sex discrimination in diverse ways. Some argue that since women are equally human as men, natural law supports women's fundamental rights to equality. However, others claim biology and tradition justify

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² Wolfe, C. (2003). Understanding Natural Law. *The Good Society*, [online] 12(3), pp.38–42. Available at: https://www.jstor.org/stable/20711143?searchText=Understanding+natural+law&searchUri=%2Faction%2FdoBasicSearch%3FQuery%3DUnderstanding%2Bnatural%2Blaw%26so%3Drel&ab_segments=0%2Fbasic_search_gsv2%2Fcontrol&refreqid=fastly-default%3Accb4dde8c64fdf9f0869288c73993311 [Accessed 16 Apr. 2024].

³ Chloros, A.G. (1958). What Is Natural Law? *The Modern Law Review*, [online] 21(6), pp.609–622. Available at: https://www.jstor.org/stable/1091025?searchText=&searchUri=%2Faction%2FdoBasicSearch%3FQuery%3DUnderstanding%2Bnatural%2Blaw%26so%3Drel&ab_segments=0%2Fbasic_search_gsv2%2Fcontrol&searchKey=&refreqid=fastly-default%3A869c2a834ef8ebf15c1619c2da322661 [Accessed 03 Apr. 2024].

⁴ Dimmock, M. and Fisher, A. (2017). *Aquinas's Natural Law Theory*. 1st ed. [online] JSTOR. Available at: https://www.jstor.org/stable/j.ctt1wc7r6j.8?searchText=&searchUri=%2Faction%2FdoBasicSearch%3FQuery%3DUnderstanding%2Bnatural%2Blaw%26so%3Drel&ab_segments=0%2Fbasic_search_gsv2%2Fcontrol&searchKey=&refreqid=fastly-default%3Af406d2ac5b76e494491347bc74cbdae2 [Accessed 19 Apr. 2024].

different social roles for women. Natural law is invoked both to challenge discriminatory policies as well as to argue that gender is biologically immutable.

It is also important to consider the intersectional nature of discrimination. Women of color, for example, often face compounded discrimination due to the intersection of their sex and race. From a natural law perspective, such intersectional discrimination is especially appalling as it denies the full humanity and dignity of individuals on multiple immutable grounds.

Natural law provides a robust framework to both understand and critique the moral implications of sex discrimination, including how it manifests and compounds across different identities. This research aims to apply this theoretical lens on discrimination challenges confronting women

CHAPTER I: NATURAL LAW AND TEXTUALIST INTERPRETATION OF SEX

“Sex”⁵ in the context of discrimination is itself a regression to natural law, enforced by textualist interpretation. A plain meaning reading requires that jurists to form ancient definitions of “male,” “female,” and “sex”⁶ rather than develop their own constructive Liberal interpretation and understanding of these words based upon Sociological- historical perspectives of ever-changing societies. The natural law history forces those words into traditional hetero-cis normativity of biological frames. Within these frames, “sex” is defined as anatomical structure. “Male” is defined as a person whose anatomical structure at birth is composed of external testes and a penis alone. “Female” is defined as a person whose anatomical structure at birth is composed of internal ovaries, a vagina, and uterus. There is no frame at all for individuals whose biology or identity does not form to those standards, which has resulted in exclusion and discrimination of women and individuals who does not appear to embody these so-called nature traits of femininity and Masculinity characteristic employed by Victorian era ideologies of the binary sex theory.

⁵ Kylie Byron, Natural Law and Bona Fide Discrimination: The Evolving Understanding of Sex, Gender, and Transgender Identity in Employment, 6 WASH. U. JUR. REV. 343 (2014).

⁶ Franke, K. (1995). The Central Mistake of Sex Discrimination Law: The Disaggregation of Sex from Gender. U. Pa. L. Rev., [online] 144, p.1. Available at: https://scholarship.law.columbia.edu/faculty_scholarship/3640/ [Accessed 03 Mar. 2024].

Jurisprudence has sailed away from natural law definitions of gender and sexual orientation. This model of gender theory developed as a legal institution in the nineteenth century: sex meant gender, and gender, in turn, meant biology.

The influence of Darwin's theory of evolution and "The Descent of Man" further justified the subordination and naturalized injustice perpetuated toward Women, on-binary and POC. The book "The Descent of Man" contains a section titled "Mental Powers of Men and Women" where he stated that men attain "a higher eminence, in whatever he takes up, than can women whether requiring deep thought, reason, or imagination, or merely the use of the senses and hands."⁷ He further claimed that "Man is more courageous, pugnacious and energetic than woman, and has a more inventive genius. His brain is absolutely larger".

This ancient model links gender roles and traditions to sex, and out of those roles and traditions grows a social order. Gendered values—Man as breadwinner, Woman as housewife; Man, as aggressive, Woman as passive—were enshrined in law, with the purpose of discouraging or eliminating non-Cis Hetero behavior⁸. These values do not grow out of any rational purpose but a will to cleave to the status quo.

For the in-power group—white, heterosexual, cisgendered-normative men—it became important to preserve a power structure centered around the political and moral dominance of white, heterosexual, cisgendered-normative. As time passed, however, in the century between 1861 and 1961⁹, and in response to increasingly visible deviations from natural law gender and sex standards, "Governing classes responded by modernizing and medicalizing the morals-based natural law model, and mobilizing state administrative structures to give legal force to the traditionalist norm." Voting rights, marriage rights, and property rights grew out of this adjustment, but prescriptions remained at the core.

Gender and sex still both meant biology, and to stray too far from those norms was to risk being labeled as "unnatural" or "perverted." These natural law values underpin our basic modern sex

⁷Darwin, Charles. 1871. *The Descent of Man, and Selection in Relation to Sex*. Vol. 2. London: John Murray.

⁸ Blankschaen, K. (2023). Including Transgender Identities in Natural Law. *Ergo: An Open Access Journal of Philosophy*, [online] 10(n/a). doi: <https://doi.org/10.3998/ergo.4648>.

⁹ Cynthia Eagle Russett (1989). *Sexual science: the Victorian construction of womanhood*. Cambridge, Mass.: Harvard University Press.

discrimination practices as a result. Sex discrimination laws are built upon the essentialist concept that “masculine” and “feminine” are packages in which all gendered behaviors are packed up and bundled together with a physical sex organ. However, it causes the assumed structure to crumble. Almost all sex discrimination is itself gender stereotyping.

¹⁰When an employer wishes to limit job applicants to men or women, that employer is not doing so because it requires particular sexual organs to do the job in question. Instead, the employer desires the normative values, abilities, and securities that are generally thought to arise from biological sex. This internalized biases that continue to perpetuate these normative values include CIS heterosexuality; an attraction to Cis-women is entangled within an assumption of Masculinity, and vice versa. By connecting sex to gender, linking both to sexual orientation, and then manufacturing a purpose for doing so, jurists continue to uphold the essentialist order of natural law.

While a constructionist view draws from the understandings set forth by queer and feminist theorists such as Franke and Butler. Specifically, the construction view asserts that the performative aspects of gender and sex necessitate acknowledging each individual's unique identity and performance before, or as opposed to, categorizing them for legal definition and assessment. Adoption of this model, pertains the believe that it is possible to create a more organized, flexible body of law than one that must torment itself by aligning with outdated and inaccurate understandings of sex and gender.

CHAPTER II: QUESTION OF SEX DISCRIMINATION THROUGH NATURAL LAW

Throughout decades philosopher defied and justified the discrimination of individual under the veil of natural law as inherent and intrinsic traits leading to causation of subordination and naturalized injustice using biological determinism. The author would like to argue that gender as a product of culture and sex as not definite as it is proven through scientific compilation, the nature of which determines one's sex is not just a simple variable of “X” and “Y” chromosomes ending

¹⁰ Ilona M. Turner, Sex Stereotyping Per Se: Transgender Employees and Title VII, 95 CALIF. L. REV. 561, 565 (2007).

in the outcome of only two possible combination of “XY” or “XX” but, various combination that may or may not result in display of external anatomical abnormalities .

The author would go on to elaborate on how the view of ancient and medieval classical natural law theorists like Aristotle and Thomas Aquinas whose views have gone on to influence modern societies in multitudes, the author would like to lay groundwork by discussing the views of each philosopher.

ARISTOTLE’S VIEWS ON WOMEN

In his work Politics, Aristotle suggests that the subjugation of women is part of a natural social and political structure. ¹¹He begins Chapter Two by identifying the two fundamental associations from which the household emerges. Aristotle explains the origin of the ruler-ruled relationship as the mutual benefit gained from the governance of intelligence over physical strength. He differentiates the association between male and female from the relationship between ruler and ruled. The latter could be described as a union of "brains" and "brawn," whereas the former is based on the drive to procreate.

Aristotle's portrayal of the male-female relationship is a generalization about the sexes¹²; it does not delve into the complexity of the dynamics between men and women. Specifically, it does not clarify why men have authority over women in addition to engaging in procreation with them. Aristotle begins to explore this question by referencing male dominance among "barbarians" or non-Greeks.

*“By nature, the female has been distinguished from the
slave. For nature makes nothing in the manner that the*

¹¹ Stauffer, D.J. (2008). Aristotle’s Account of the Subjection of Women. The Journal of Politics, 70(4), pp.929–941. doi: <https://doi.org/10.1017/s0022381608080973>.

¹² to, C. (2009). Aristotle’s view that women are subject to men, impulsive, compassionate, complaining and deceptive, and that women’s happiness should matter for society. [online] Wikipedia.org. Available at: https://en.m.wikipedia.org/wiki/Aristotle%27s_views_on_women#:~:text=In%20Politics%201.1254b%2C%20Aristotle [Accessed 10 Apr. 2024].

coppersmiths make the Delphic knife—that is, frugally—
but, rather, it makes each thing for one purpose. For
each thing would do its work most nobly if it had one
task rather than many. Among the barbarians the
female and the slave have the same status. This is
because there are no natural rulers among them but,
rather, the association among them is between male and
female slave. On account of this, the poets say that “it is
fitting that Greeks rule barbarians,” as the barbarian
and the slave are by nature the same.”

One might well use this reasoning to justify the place of women in the household. One might conclude that women are born to a role and a purpose different from that of men.¹³ And, given the importance he has just assigned to the procreative impulse in bringing men and women together, one might expect Aristotle to identify procreation as the task, or purpose, to which women are naturally directed if each type of human being has been created with a view to one purpose, he reasons, then the common practice of using women as slaves is unnatural.

Aristotle shifts our attention away from the naturalness of women's subjugation and instead highlights that among non-Greeks, the status of women is abnormally low. This aspect of non-Greeks' lives, which reveals their lack of civilization and justifies their subjugation, contrasts with the Greek approach. Greek men's authority over their women, in contrast, is not based on sheer force. Aristotle implies that the very fact that in Greece, relationships between the sexes are governed by principles higher than "might makes right" attests to the Greeks' superior civility.

¹³ Lange, L. (2005). *Woman is Not a Rational Animal: On Aristotle's Biology of Reproduction*. Kluwer Academic Publishers eBooks, pp.1–15. doi: https://doi.org/10.1007/0-306-48017-4_1.

THOMAS AQUINAS'S VIEW ON WOMEN

Thomas Aquinas¹⁴ drew heavily from Aristotelian perspectives of women, shaping his own views on the subject. The most common reference to the views of Aquinas on women are from his *Summa Theologiae*. The question under consideration there is whether the female, because of her inherent imperfection, should not have been part of the original creation. Aquinas replies that “woman should have been produced in the Eden, since she is necessary for the generation of the species.” He then goes on to cite with approval Aristotle’s infamous affirmation that “the female is a misbegotten male.” Aquinas himself declares that women are “*deficiens et occasionatus*” – defective and misbegotten.

In the question of whether the female should be subject to the male, Aquinas asserts that females are inherently subordinate to males and that this “subjection existed even before sin.” Female subordination, for Aquinas, is not a result of the fall, but part of the created order. Such female subordination, he argues, is actually “for their own benefit and good.”

For Aquinas, women are merely a means to an end. That the female is described as “misbegotten” is a pejorative term probably referring to Eve’s eating of the fruit in the garden of Eden. To be “misbegotten” carries the connotation of contempt and disgust. *Second*, the female was an inherently subordinate and inferior being (inferior in intellect and reason). It is quite clear that Aquinas did not believe females were made in the image of God in the same way as males.

Aristotle viewed women as inferior versions of men, with their purpose being childbearing. This binary view of the sexes influenced later theorists and social norms. However, we now know gender exists on a spectrum, and one's worth isn't defined by biology alone. Aquinas emphasized reason as humanizing, but still endorsed separate gender roles based on tradition rather than equality. His focus on procreation and "natural" social order have been cited to argue

¹⁴ Dimmock, M. and Fisher, A. (2017). Aquinas’s Natural Law Theory. 1st ed. [online] JSTOR. Available at: https://www.jstor.org/stable/j.ctt1wc7r6j.8?searchText=&searchUri=%2Faction%2FdoBasicSearch%3FQuery%3DUnderstanding%2Bnatural%2Blaw%26so%3Drel&ab_segments=0%2Fbasic_search_gsv2%2Fcontrol&searchKey=&refreqid=fastly-default%3Af406d2ac5b76e494491347bc74cbdae2 [Accessed 19 Apr. 2024].

discrimination aligns with natural law. But his distinction between primary/secondary precepts suggests room for progress.

Both philosophers lacked our modern understandings of psychology, sociology and human rights and as they were products of their times. We must be careful not to present their views as absolute or infallible. While appreciating their contributions, we must also acknowledge how binary interpretations have been used to deny rights throughout history. In contemporary jurisprudence, natural law is still invoked both to challenge and justify discrimination. But by re-examining classical theories with an intersectional, multidimensional lens we can trace back to the origin of sex discrimination jurisprudence in natural law perspective in modern day and recognizes diversity in human nature, the author believes that we must interpret natural law as an evolving concept that prioritizes human dignity for all.

CHAPTER III: ANALYSING CASE UNDER INTERCONNECTIVE LENS EXAMINING SEX DISCRIMINATION AND NATURAL LAW

This chapter delves into the interplay between sex discrimination and natural law principles, utilizing landmark legal cases to illuminate the nature of this relationship. Here, we will discuss pivotal Court decisions – *Roe v. Wade* (1973) and *Price Waterhouse v. Hopkins* (1989) – through an "interconnective lens," examining their implications for individual autonomy, social justice, and the inherent dignity of all persons.

Roe v. Wade, a cornerstone case in the abortion rights debate, established a woman's right to choose under the Fourteenth Amendment's Due Process Clause. While seemingly a victory for bodily autonomy, the chapter argues for a more meticulous understanding. It explores how restrictions on abortion disproportionately burden women facing socioeconomic disadvantage and those navigating intersecting forms of discrimination. Through the lens of natural law, the chapter contends that such limitations infringe upon fundamental principles of equality and justice.

Moving beyond *Roe v. Wade*, the chapter explores *Price Waterhouse v. Hopkins*, a case that broke new ground by explicitly linking sex discrimination to natural law concepts. The case involved Ann Hopkins; a woman denied a partnership despite stellar performance due to her failure to conform to stereotypical feminine behavior. The chapter analyzes the court's recognition of gender

stereotyping as a form of sex discrimination, highlighting its embrace of a social constructionist perspective on gender identity.

By examining these cases together, the chapter aims to demonstrate the critical role of legal frameworks in upholding the natural right to self-determination, particularly when it intersects with issues of sex and reproduction. It underscores the ongoing struggle to fully realize the potential of these landmark decisions and argues for the necessity of comprehensive policies that ensure equitable access to the rights and opportunities they champion.

ROE VS WADE 410 U.S. 113 (1973)

The ruling in *Roe v. Wade* that the Due Process Clause safeguards a woman's right to abortion has significant implications for sex equality and self-determination under natural law. Superficially, the decision endorsed a woman's autonomy over her own body and reproductive choices. However, an intersectional examination offers a different perspective:

Restrictions on abortion disproportionately impact those already experiencing intersecting forms of discrimination. For low-income women and women of color, limited access to safe abortion perpetuates systemic inequalities across healthcare, education, and financial stability. From a natural law standpoint, such laws infringe upon principles of equal dignity and justice.

Pregnancy and motherhood intersect with other identity factors such as age, marital status, disability, and gender identity or expression. For minors, single women, transgender and non-binary individuals, and persons with disabilities, compelled pregnancy due to limited choices can severely constrain life opportunities and undermine the natural right to participate freely in society.

Utilizing natural law concepts of human flourishing, individuals of all backgrounds possess an equal right to make intimate decisions aligned with their unique circumstances and aspirations. Denying abortion based solely on gender contradicts this fundamental right to self-determination.

Roe v. Wade set a critical precedent in terms of natural law, emphasizing that governments must respect individual autonomy over inherently private matters of reproductive health and identity. Nonetheless, its potential remains unfulfilled without comprehensive policy measures ensuring equitable access to these rights and opportunities for all individuals.

PRICE WATERHOUSE V. HOPKINS 490 U.S. 228 (1989)

The Supreme Court of US first addressed the intersection of sex discrimination and natural law in *Price Waterhouse v. Hopkins*. The case involved Ann Hopkins, a senior manager at Price Waterhouse, who was denied a partnership despite her excellent job performance because her behavior, dress, and appearance were deemed excessively masculine. Hopkins was the only female candidate proposed for partnership that year, and the justifications given showcased clearly the gender centric statements of the other partners show a clear use of gender stereotyping in the rationalization of her deferral.

Partners at the firm criticized her demeanor, with one calling her "macho" and another suggesting she overcompensated for being a woman. Criticisms included her use of profanity, which one partner noted was problematic because she was a woman using foul language. In contrast, one supporter stated that Hopkins had transitioned from a tough-talking, masculine manager to a more appealing candidate for partnership. Ultimately, the deciding partner advised her to enhance her femininity as quoted "walk more femininely, talk more femininely, dress more femininely, wear make-up, have her hair styled, and wear jewelry."

The Court ruled that the reasons given for Hopkins' deferral amounted to unacceptable sex discrimination under Title VII. It reasoned that sex discrimination includes discrimination against individuals who do not conform to gender norms and stereotypes. The Court stated that employers can no longer judge employees based on stereotypes associated with their group.

Though *Price Waterhouse* established a foundation for recognizing that gender stereotyping equates to sex stereotyping. This decision signaled the Court's acceptance of the social constructionist theory, acknowledging that biological configuration does not dictate a particular gendered behavior. The ruling suggested that gender and sex are distinct concepts that need not align for the purposes of employment discrimination based on sex.

CONCLUSION

While concluding, the concept of natural law provides a complex and evolving framework for comprehending sex discrimination. Classical theorists such as Aristotle and Aquinas laid the foundation for discriminatory practices that were based on the idea of biological determinism.

However, in light of our modern understanding of gender as a social construct and the recognition of sex existing on a spectrum, their views can be challenged.

Through the lens of intersectionality, we gain insight into how sex discrimination disproportionately impacts marginalized groups. Landmark cases like *Roe v. Wade* and *Price Waterhouse v. Hopkins* exemplify the courts' shift towards acknowledging the inherent human dignity of individuals and rejecting gender stereotypes.

Looking ahead, natural law can be interpreted as a tool for advancing equal rights and opportunities for all individuals. This forward-looking perspective encourages the promotion of equality and justice in society. By embracing a comprehensive understanding of sex discrimination and incorporating the principles of natural law, we can towards creating a more inclusive and equitable world.

REFERENCES

- Wolfe, C. (2003). Understanding Natural Law. *The Good Society*, [online] 12(3), pp.38–42. Available at: https://www.jstor.org/stable/20711143?searchText=Understanding+natural+law&searchUri=%2Faction%2FdoBasicSearch%3FQuery%3DUnderstanding%2Bnatural%2Blaw%26so%3Drel&ab_segments=0%2Fbasic_search_gsv2%2Fcontrol&refreqid=fastly-default%3Accb4dde8c64fdf9f0869288c73993311 [Accessed 16 Apr. 2024].
- Chloros, A.G. (1958). What Is Natural Law? *The Modern Law Review*, [online] 21(6), pp.609–622. Available at: https://www.jstor.org/stable/1091025?searchText=&searchUri=%2Faction%2FdoBasicSearch%3FQuery%3DUnderstanding%2Bnatural%2Blaw%26so%3Drel&ab_segments=0%2Fbasic_search_gsv2%2Fcontrol&searchKey=&refreqid=fastly-default%3A869c2a834ef8ebf15c1619c2da322661 [Accessed 03 Apr. 2024].
- Dimmock, M. and Fisher, A. (2017). *Aquinas's Natural Law Theory*. 1st ed. [online] JSTOR. Available at: https://www.jstor.org/stable/j.ctt1wc7r6j.8?searchText=&searchUri=%2Faction%2FdoBasicSearch%3FQuery%3DUnderstanding%2Bnatural%2Blaw%26so%3Drel&ab_segments=0%2Fbasic_search_gsv2%2Fcontrol&searchKey=&refreqid=fastly-default%3Af406d2ac5b76e494491347bc74cbdae2 [Accessed 19 Apr. 2024].

- Kylie Byron, Natural Law and Bona Fide Discrimination: The Evolving Understanding of Sex, Gender, and Transgender Identity in Employment, 6 WASH. U. JUR. REV. 343 (2014).
- Franke, K. (1995). The Central Mistake of Sex Discrimination Law: The Disaggregation of Sex from Gender. U. Pa. L. Rev., [online] 144, p.1. Available at: https://scholarship.law.columbia.edu/faculty_scholarship/3640/ [Accessed 03 Mar. 2024].
- Darwin, Charles. 1871. The Descent of Man, and Selection in Relation to Sex. Vol. 2. London: John Murray.
- Blankschaen, K. (2023). Including Transgender Identities in Natural Law. Ergo: An Open Access Journal of Philosophy, [online] 10(n/a). doi: <https://doi.org/10.3998/ergo.4648>.
- Cynthia Eagle Russett (1989). Sexual science: the Victorian construction of womanhood. Cambridge, Mass.: Harvard University Press.
- Ilona M. Turner, Sex Stereotyping Per Se: Transgender Employees and Title VII, 95 CALIF. L. REV. 561, 565 (2007).
- Stauffer, D.J. (2008). Aristotle's Account of the Subjection of Women. The Journal of Politics, 70(4), pp.929–941. doi: <https://doi.org/10.1017/s0022381608080973>.
- Lange, L. (2005). Woman is Not a Rational Animal: On Aristotle's Biology of Reproduction. Kluwer Academic Publishers eBooks, pp.1–15. doi: https://doi.org/10.1007/0-306-48017-4_1.
- Rhode, D.L. (1989). Justice and Gender: Sex Discrimination and the Law. [online] JSTOR. Harvard University Press. Available at: <https://www.jstor.org/stable/j.ctvjhzs67> [Accessed 20 Apr. 2024].
- Smith, N.D. (1983). Plato and Aristotle on the Nature of Women. Journal of the History of Philosophy, [online] 21(4), pp.467–478. Available at: <https://muse.jhu.edu/article/226997/summary> [Accessed 19 Apr. 2024].
- Burns, T. (1998). Aristotle and Natural Law. *History of Political Thought*, [online] 19(2), pp.142–166. Available at: https://www.jstor.org/stable/26217500?searchText=&searchUri=%2Faction%2FdoBasicSearch%3FQuery%3DUnderstanding%2Bnatural%2Blaw%26so%3Drel&ab_segments=0%2Fbasic_search_gsv2%2Fcontrol&searchKey=&refreqid=fastly-default%3A503c01e3c1921da38708271ec0c7f484 [Accessed 14 Apr. 2024].

- Huber, K. (2015). Everybody's a Little Bit Sexist: A Re-evaluation of Aristotle's and Plato's Philosophies on Women. [online] www.lakeforest.edu. Available at: <https://www.lakeforest.edu/news/everybodys-a-little-bit-sexist-a-re-evaluation-of-aristotles-and-platos-philosophies-on-women#:~:text=Aristotle%20threw%20women%20a%20bone>.
- DiMauro, A. (2020). How Aristotle Viewed Women: An Exposition of His Sexism and Teleology. [online] Medium. Available at: <https://anthonydimauro.medium.com/how-aristotle-viewed-women-an-exposition-of-his-sexism-and-teleology-ec698f25ffe2>.
- Answers in Genesis. (n.d.). Darwin's Views of Women & Effect on Society. [online] Available at: <https://answersresearchjournal.org/darwins-view-of-women/#:~:text=Darwin%27s%20View%20of%20Women> [Accessed 09 Apr. 2024].
- Roughgarden, J. (2013). *Evolution's rainbow: diversity, gender, and sexuality in nature and people*. Berkeley, Calif.: University of California Press.
- who /cares), D.P. (pronouns: (2022). What is sex/gender, according to St Thomas Aquinas? [online] Medium. Available at: <https://danapham-au.medium.com/what-is-sex-gender-according-to-st-thomas-aquinas-778699ac0ad9> [Accessed 16 Apr. 2024].
- Women's Ordination Worldwide. (n.d.). Thomas Aquinas and Women's Ordination. [online] Available at: <https://womensordinationcampaign.org/thomas-aquinas-and-womens-ordination>.
- Carolyncustisjames (2013). Thomas Aquinas on Women. [online] Carolyn Custis James. Available at: <https://carolyncustisjames.com/2013/08/06/thomas-aquinas-on-women/>.
- Blankschaen, K. (2023). Including Transgender Identities in Natural Law. *Ergo: An Open Access Journal of Philosophy*, [online] 10(n/a). doi: <https://doi.org/10.3998/ergo.4648>.