

The Impact of Differing Welfare Models on the Theoretical Framing and Implementation of Physical Accessibility: A Comparative Study of Japan and Indonesia

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Abstract

Despite the global shift toward a social model of disability that emphasizes removing environmental barriers, many countries still struggle to translate legal rights into accessibility. This study examines how different national welfare systems, such as the productivist model in Japan and the rights-based model in Indonesia, impact the actual implementation of disability infrastructure. Using a qualitative comparative case study and a Most Different Systems Design (MDSD), this research analyzed primary legal documents and official reports from the 2024-2025 period. The findings reveal a significant social policy paradox in both nations. In Japan, productivist focus on economic utility has created adequate physical infrastructure, yet has resulted in social isolation in individuals. Conversely, Indonesia's rights-based approach provides strong humanistic rhetoric but suffers from policy decoupling, where progressive laws are not matched by material reality, and further sustained by deep-rooted familism. Therefore, the study concludes that both countries must move beyond purely economic or symbolic goals toward Implementation Engineering. By adopting an interactional understanding of disability, policymakers can bridge the gap between legal rhetoric and physical actuality to create a genuine architecture of belonging.

Keywords: Physical Accessibility, Welfare Models, Policy Implementation, Japan, Indonesia

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INTRODUCTION

The 21st-century society with disability policy is characterized by the global paradigm shift between the medical model, in which disability is viewed as an individual impairment that should be fixed, and a differing social model, in which exclusion is considered to be the result of systemic and environmental barriers (Oliver, 2013). This theoretical development is reflected in Indonesia's ratification of the UN Convention on the Rights of Persons with Disabilities (CRPD) through Law No. 19/2011, followed by the adoption of Law No. 8/2016 (Government of Indonesia, 2011, 2016; Setiawan, 2026). These legislative achievements indicate a formal understanding of substantive equality and a shift from charity-based aid to a rights-based approach grounded in non-discrimination and equal participation (Setiawan, 2026). Recent publications in the 2020-2025 timeframe have, additionally, emphasized the narrative that Indonesia has made a substantial normative

foundation, creating a progressive legal framework that requires reasonable accommodation and the elimination of structural barriers (Setiawan, 2026).

Findings by Setiawan (2026) also show that Indonesia has progressed into an integrated governance architecture with the help of regulatory tools, including Government Regulation No. 70/2019 to organize policy planning and Presidential Regulation No. 68/2020 to create the National Disability Commission (KND). Nevertheless, studies by Tsaputra and Giuntoli (2024) point out that, as progressive as these reforms are under the Jokowi administration, inclusion is often half-hearted due to weak administrative incentives. Likewise, the local implementation in Kudus Regency by Dewi et al. (2025) demonstrates that, despite the existence of regional regulations, these often do not lead to available infrastructure or enforceable practices.

In a broader context, researchers observe that the Asian Welfare Model is becoming increasingly susceptible to demographic strains. On the one hand, Japan, in particular, has shifted towards a Productivist Welfare Model, in which social policies are imperative for economic sustainability amid a growing elderly population and a shrinking workforce (Holliday, 2000; Miura, 2021). This economic logic, therefore, explains the 2024 Amended Act on Eliminating Discrimination against Persons with Disabilities, which obligates the private sector to offer reasonable accommodation (Cabinet Office, Government of Japan, 2024). On the other hand, Indonesia has put an effort to institutionalize the fulfillment of rights through regulatory mechanisms, such as Government Regulation No. 70/2019 and the creation of the National Disability Commission (KND) using Presidential Regulation No. 68/2020 (Government of Indonesia, 2019, 2020; Setiawan, 2026).

In spite of such legal architecture, it is crucial to note a long-standing Social Policy Paradox in which legal acknowledgment does not always translate into inclusive practice (Setiawan, 2026). The literature recognizes an extreme *de jure-de facto* gap that, despite having rights on paper, administrative frameworks, technical capabilities, and budgeting practices to actualize them are, arguably, disproportionately underdeveloped. This gap in implementation is especially noticeable in the physical non-presence of available infrastructure; as of late 2025, 2% of 10,000 community health centers (Puskesmas) in Indonesia are officially disability-friendly, which is in stark contrast to the governmental target of 35% (Ministry of Health, 2025; Setiawan, 2026).

Scholars have also indicated that this tension is an outcome of Policy Decoupling, in which states follow progressive global norms to remain legitimate while internal implementation frameworks have stagnated (Meyer & Rowan, 1977; Tsaputra & Pollard, 2024). As Japan's policy changes to corporate compliance and economic utility, social isolation within rigid institutional frameworks continues; and Indonesian movement, on the other hand, stagnates at the stage of symbolic legalism and lacks physical access to the means of production (Tsaputra & Pollard, 2024). The current body of research is widely scattered across fields, with an emphasis on either legal analysis or service-specific results, creating a gap in comparative analysis of the welfare models (Productivist vs. Rights-based) that underlie these implementation failures (Setiawan, 2026). In addition, the current 2024/2025 policy changes have been reported, yet existing literature has not examined these changes from a comparative Social Architecture perspective to understand how accessibility serves as a barrier to health, education, and employment (Setiawan, 2026).

It is worth considering how academic and national institutions serve as structural elements in different welfare models. In Japan, there is a lot of institutionalization surrounding the operationalization of accessibility, with the national anchor, serving as the minimum standard for public and private compliance. A system of model institutions tends towards a top-down enforcement system that focuses on a uniform standard across the system. On the contrary, the Indonesian landscape is not yet embracing these institutional blueprints from central locations, while progressive mandates are only deciphered by local centers and regional apparatuses, without a national reference point. It is therefore necessary that such analysis of these welfare systems takes into consideration not only the provisions of the law but also the institutions responsible for translating legal jargon into physical reality. The comparative gap highlights the significant difference between the effects of institutional anchors and their absence on the success of policy implementation.

This study, therefore, aims to provide a qualitative comparative analysis of the frameworks for disability accessibility policy in Japan and Indonesia, with a particular focus on the policy changes that have occurred between 2024 and 2025. In order to fulfill these goals, the paper uses a multidimensional sociological approach to explain the disconnection between disability laws and their physical implementation. On the structural level, the research makes use of the Institutional Theory, namely, the idea of Policy Decoupling (Meyer & Rowan, 1977) to explain how states can implement progressive global norms as a ceremonial strategy to acquire international legitimacy when internal implementation is stagnated. This structural analysis is further localized within the Asian Welfare Model where the state implicitly is drawing on informal family

networks as the means to manage social risks (Holliday, 2000). To assess the built environment, in itself, the work applies The Body as Social Theory (Siebers, 2011) which suggests that infrastructure is materialized ideology that favors a archetypal body which is economically productive. In summary, the analysis incorporates Interactional Nature of Disability (Shakespeare, 2014) as a synthesis to understand disability as dynamic friction between impairment in an individual and an unaccommodating environment, beyond the symbolic legalism to the actual social citizenship.

METHOD

This research uses a qualitative, macro-level, comparative case study design. Based on the Most Different Systems Design (MDSD), the study compares the developed Productivist model of welfare in Japan and the developing Rights-based model in Indonesia. The design is chosen to determine how universal accessibility criteria, such as those outlined in the UN CRPD, are translated across countries with respect to their socio-economic and political architecture.

The main data set for this study was compiled through purposive sampling of open-source legal sources and official reports. Sources were filtered based on four a priori eligibility criteria: 1) Population with focus on disabled individuals and national infrastructures; 2) Exposure by means of significant involvement with 2024/2025 changes in policy; 3) Context of national-level governance in Japan and Indonesia; and 4) Outcome through discovery of gaps in implementation.

To fully realize these a priori eligibility criteria, each potential source has been subjected to a thorough three-tiered screening matrix in order to ensure that each potential source has a structural match to the macro-level comparative framework. In terms of population focus, documents were carefully examined to ensure they reported empirical baselines and/or legislative requirements for spatial accessibility for people with physical and mobility-related impairments, rather than broader healthcare policies. The second criterion, pertaining to temporal exposure, specified that administrative adjustments, structural changes, and legislative enforcement mechanisms that were either adopted or litigated heavily during the 2024-2025 window be explicitly included in any legal text or annual report. It was deliberately chosen to test the relevance of the policy frameworks amid significant restructuring in both East and Southeast Asian economies in the wake of the pandemic. The third criterion for national-level governance and regional/municipal guidelines was not collected during the initial data collection process and only came into play if it was explicitly referenced in federal reports as an example of national-level governance failure. Third, the outcome criterion required that the selected texts include qualitative or quantitative evaluation metrics (e.g., enforcement percentages, institutional audits, or compliance rates) that enable a direct structural comparison between policy decoupling and productivist utility measures. The following filtering process was necessary to create a tightly controlled, qualitative dataset to support macro-level institutional abstractions without introducing confounding socio-political variables from an unrelated legislative sector.

According to these criteria, the main legal texts to be examined are the Barrier-Free Act (2020) of Japan and the 2024 Amended Act to Eliminate Discrimination against Persons with Disabilities, as well as Law No. 8/2016 and Government Regulation (PP) No. 42/2020 of Indonesia. These were complemented by assessable evidence of the White Paper on Persons with Disabilities 2024 (Japan) and the Annual Health Facility Accessibility Report 2024/2025 (Indonesia).

The data search and Collection Technique used two strategies to extract materials to base the analysis on formal requirements and scholarly commentary. To obtain the official regulations, first, the official websites of the Japanese Cabinet Office and the Indonesian Ministry of National Development Planning (Bappenas) were searched manually. Second, a purposive search was conducted in academic databases, including Google Scholar, to find peer-reviewed policy analyses and literature reviews on the 2020-2025 period in each country.

The data analysis technique employed in this research is Qualitative Content Analysis (QCA) which generalise the results overlaid on a "Comparative Matrix" to identify examples of Policy Decoupling, where there is progressive legal rhetoric with no physical implementation of the laws. The analysis is operationalized by two pointers. First, theoretical framing, the frequency of the keywords that corresponded to either Economic Utility or Social Citizenship; and second, Implementation Strength, classifying legal requirements as either Binding/Sanction-based or Advisory/Guideline-based. The primary documents were then structurally text-skinned to extract specific text referring to spatial changes and administrative sanctions. Second, a semantic mapping was performed to classify the semantic use of "responsibility" in the context, distinguishing between "received" responsibilities (from the state) and "expected" responsibilities (from the community). The analysis places the qualitative material within a precise comparative framework, enabling the structured identification

of the operational gaps in each country's infrastructure development system. This systematic cross-examination allows the conceptual abstractions of Policy Decoupling and Productivist Capitalism to be directly anchored in the material text of the current legislation, thereby removing any analytical bias and providing a verifiable audit trail of the comparative results.

RESULTS AND DISCUSSION

Findings

In qualitative content analysis of 2024/2025 disability policy documents in Japan and Indonesia, it was found that there is a clear difference in the framing and operationalization of accessibility. These results are placed in a Comparative Policy Matrix (see Table 1) using two main indicators: Theoretical Framing and Strength of Implementation.

Table 1. Comparative Policy Matrix of Disability Accessibility in Japan and Indonesia

Indicator	Analytical Category	Japan (Productivist Utility Model)		Indonesia (Rights-Based Citizenship Model)	
		Finding Summary	Quote	Finding Summary	Quote
Indicator 1: Theoretical Framing	Philosophical Basis	Focused on equality to realize a society of coexistence where no people are set apart.	"...all persons with disabilities are equal to persons without disabilities, are entitled to dignity as individuals enjoying fundamental human rights".	Framed as an "integral part" of citizenship and a "trust and grace of Almighty God".	"...guarantees the survival of every citizen... including persons with disabilities who have the legal standing and have equal human rights".
	Social Narrative	Aiming for mutual respect of personality and individuality without segregation.	"...contribute to the realization of a society of coexistence in which no people are set apart on the basis of disability".	Explicitly acknowledges that the population lives in "underdeveloped and/or poor conditions".	"...most persons with disabilities in Indonesia live in vulnerable, underdeveloped, and/or poor conditions".
	Definition of Disability	Broadly categorizes physical, intellectual, mental, and developmental disabilities.	"physical disability... intellectual disability... mental disability (including developmental disabilities), and other persons with disabilities".	Defined by the limitations experienced when "interacting with the environment" and systemic barriers.	"...limitations who may, in interacting with the environment, experience any barriers and difficulties to fully and effectively participate".
Indicator 2: Implementation Strength	Legal Mandate	Strictly mandates the "elimination	"...shall not violate the rights and	Recognizes that older laws (1997) are no	"Law Number 4 of 1997... is no longer appropriate

		of social barriers".	interests of persons with disabilities by discriminating... on the basis of disability".	longer appropriate for modern needs.	to the paradigm of the needs of persons with disabilities".
	State/Private Responsibility	Clearly defines the duties of the government and "Public and Private Entities" in formulating policies.	"State and local governments shall have the responsibility to formulate and implement policies for the prevention of discrimination".	The state "respects, protects, and fulfills" rights through a systemic national development paradigm.	"...respects, protects, and fulfills the Rights of Persons with Disabilities... which constitutes an integral part of Indonesian citizens".
	Governance Mechanism	Focuses on corporate compliance to maintain labor productivity.	"Public and private entities... shall provide reasonable accommodation for the purpose of eliminating social barriers".	A focus on "protection and empowerment" within the vision of Golden Indonesia 2045.	"...implementation and evaluation of the Respect, Protection, and Fulfillment of the Rights of Persons with Disabilities".

The 2024/2025 disability policy documents in Japan and Indonesia were analysed, yielding three main findings on the social architecture of accessibility. To begin with, there is an inherent difference in the philosophical foundation of the provision of rights. The concept of accessibility in Japan is based on the notion of Social Coexistence, which holds that no one should be singled out as disabled. This implies that Japan perceives accessibility as a means of functional integration to establish a unified society. Conversely, the Indonesian model conceptualizes disability rights in the form of a "*Trust and Grace of Almighty God*" and a subset of equal human rights of all citizens. This observation means that Indonesia employs the normative-spiritual legitimacy strategy to legitimize its policy reforms.

Second, the meaning of disability determines the scope of state intervention. Japan uses an inclusive yet categorical definition (physical, intellectual, mental, and developmental) to provide Reasonable Accommodation and eliminate social barriers. Indonesian law, on the other hand, clearly outlines disability in terms of how a person interacts with an environment that is rife with barriers and challenges. This recognizes that disability is not merely a medical condition but is a consequence of environmental failures that tend to leave persons with disabilities in vulnerable, underdeveloped, and/or poor conditions.

Third, the mechanisms of responsibility for implementation differ sharply. Japan is highly rigorous in ensuring that social barriers are eliminated by reasonable accommodation by public and private entities, as an expression of a Productivist Utility model that enables all citizens to engage in the economy. In the meantime, Indonesia emphasises a paradigm shift from outdated laws (1997) to a state-led system of protection and empowerment. Yet, such attention to the administrative fulfilment of rights tends to lead to Policy Decoupling, where top-level discourse of equality is not matched by the physical infrastructure below.

A clear difference is observed between the two countries regarding the mobilization of institutional actors to ensure spatial compliance when examining the ways in which the operational mechanisms of responsibility mentioned in the comparative content analysis achieve that. The coding architecture (CA) shows that Japan's approach is based on a system of decentralized execution strongly constrained by centralized accountability systems. By law, "Public and Private Entities" are obliged to implement spatial changes, making corporate offices, commercial centers and transport hubs actors that are active in welfare delivery. This structural integration makes compliance not only an administrative decision but a legal requirement for economic participation, and corporate governance is thus merged with national productivist survival. Unlike this, the Indonesian governance system is extremely centralized and bureaucratic with no horizontal enforcement mechanism at the local level. The rhetoric of the legislative discourse is strong on the system of

"protection and empowerment" that is being institutionalized with the vision of Golden Indonesia 2045, however, the tools of the administration are focused at the top level of the ministries as well as the National Disability Commission (KND). This institutional set-up entails a rather extreme administrative bottleneck, where the national government draws up very progressive and normative institutional structures, but the local government bodies at the regional level are weak in terms of resources and legal authority to apply these to private developers and regional infrastructure projects. The strength of implementation in Indonesia is then significantly weakened as it moves down the bureaucracy, and the constitutional right becomes a discursive guideline or a statement of goodwill.

Nonetheless, there are also clear connections between these three findings. In Japan, the value of coexistence promotes high physical accessibility but poses a risk of establishing harmonious segregation when social interaction is not necessarily organic. The legal acknowledgment of the environmental barriers in Indonesia generates an ethical sense of urgency for physical change, but the dependence on a state-led paradigm of protection tends to slow down the real engineering of inclusive and accessible infrastructure at the local level.

Discussion

This qualitative analysis finds that there is a Social Policy Paradox that characterizes the 2024/2025 disability situation in East and Southeast Asia. The Japanese system of physical infrastructure, grounded in the principles of Social Coexistence and Reasonable Accommodation, has successfully produced world-class physical infrastructure; however, this achievement needs to be scrutinised through the lens of Body as Social Theory (Siebers, 2011). According to Siebers, the built environment is never neutral; it is a materialized ideology geared towards an archetypal body, that is, one that is fast, has stamina, and is economically productive. In Japan, data coding shows that the concept of accessibility is presented as a compulsory State Responsibility to remove obstacles, but the ultimate aim is the effective flow of this prototypical, productive citizen. This, consequently, leads to what this study identifies as Harmonious Segregation: a sociological situation in which individuals with disabilities are physically accommodated within their social environment and workplaces to fulfil functional needs, yet remain secluded in the social context. Noting that the social architecture is designed to support the high-speed usefulness of Society 5.0, but not to accommodate the actual diversity of humans, people tend to be physically present but socially segregated, entangled in forced institutional roles that emphasise economic utility over natural belongingness.

Compared with Indonesia's institutional framework, Harmonious Segregation in Japan is a phenomenon that exemplifies how various welfare models use academic and state apparatuses to conceptualise disability inclusion. However, the institutional centers play a key role in the structural implementation of accessibility in Japan, as is the case of the University of Tsukuba, which serves as a national centre of reference on disability and accessibility (University of Tsukuba, 2024). In the Productivist Welfare Model, institutions such as Tsukuba become highly sophisticated engineering and knowledge centers where the built space is optimized in a systematic way to help seamlessly integrate disabled persons with higher education and into the corporate labour market. This bottom-up technical approach is in contrast with the institutional setup in Indonesia, however. The Indonesian context does not merely focus on the mechanical compliance, instead, it brings the Disability Innovation Centers (DICs) run by universities to promote a more comprehensive and humanistic approach to social citizenship (Ministry of Education, Culture, Research, and Technology, 2024). These local centers are vital structural links, converting academic research into community based advocacy and legal empowerment systems. It thus becomes clear that a vast comparative understanding emerges: on the one hand, the Japanese model of institutional giants, such as Tsukuba, brings technical perfection of accessibility, but at the cost of isolation; on the other hand, in Indonesia the heavily-localized focus of such specialized centers becomes the psychological and social engine of the rights-based model. They make sure that, in the face of policy-driven decoupling of physical infrastructure, the emphasis remains on human dignity, social awareness, and co-creation from the bottom up of an inclusive social fabric.

This tension within the Japanese built environment, where high technical integration ended up concealing a broad social division, thus requires a deeper engagement with the foundational premises of the theory. Hence, it is not the ideology of absolute social citizenship, but minimising dependant population ratios that is the economic force behind the physical accessibility seen in major Japanese transit hubs and business facilities. The contrast to this is a dramatic sociological paradox in which a person with a physical disability is granted seamless mobility across the best of world-class infrastructure, while consistently missing the deepest

organic life of the social world. While the built environment works well as an economic unit, it is not able to read the disabled body as a place of multiple human experiences, and thus results in systemic isolation, that is, the physical presence of the person with a disability within a defined institutional space, but the social presence within a limited institutional role.

Framed in sharp contrast, the Indonesian version of the concept of the equality of human rights as an inseparable component of citizenship and a *Grace of Almighty God* provides a more humanistic rhetoric that seemingly places the soul in the center of the frame and not the working body. Nonetheless, this framework is now plagued by an underlying lack of physical infrastructure that is deeply physical in nature, with only 2% of community health centers being accessible. This disjuncture is also a transparent instance of the *Policy Decoupling* (Meyer & Rowan, 1977) in which the state espouses the myth and ceremony of the international rights-based language to receive international legitimacy, but does not change the internal structures, including the built environment. This detachment is reinforced by the deep-rooted *Familialism*, a central characteristic of Asian welfare models where state uses the family units as a means to administer the vulnerable conditions (as stated in the coding) instead of constructing a social structure of accountability.

The dichotomy between these two countries can be best understood using Interactional Nature of Disability (Shakespeare, 2014). One of the assumptions made by Shakespeare is that disability consists of the conflict between an impairment and an unaccommodating environment. When Japan is addressing the Productivist Welfare Model (Holliday, 2000) that aims at adjusting the environment to the productive body, the rights model of Indonesia addresses the adjustment of the law to the status of the citizen. Nevertheless, through the legal definition of disability as an interaction with barriers, without the infrastructure it creates, the Indonesian state is literally creating the disability that it ostensibly alleviates. In order to turn the notion of Golden Indonesia 2045 and Society 5.0 a reality, neither of the two countries can help but shift their levels of normative endorsement or economic utility to implementation engineering, where the physical environment is normalised to meet the human dignity embodied in their respective legislations.

Such a radical difference in the results of implementation between Japan and Indonesia can be traced back to the welfare models, which are the invisible blueprints to their social architecture. Productivist Welfare Capitalism provides the best explanation of the high rate of physical compliance in Japan (Holliday, 2000). According to this model, social policy is considered to be a subsidiary branch of economic policy; the state is interested in social investments, which directly contribute to economic growth and work efficiency. This logic is reflected in the coding outcomes of Japan that focus on the concept of Reasonable Accommodation and State and Local Responsibility. Japan, unable to afford to leave any part of the population idly in the light of an aging society and a dwindling labor pool, not only require accessibility as a moral right, but as a means towards economic survival. Japan thus achieved this by applying accommodation in the private sector by making sure that the disabled citizen is converted into a useful piece of work, making the difference between the law and the physical infrastructure to keep the nation productive.

On the contrary, the implementation gap in Indonesia is an exemplary demonstration of *Policy Decoupling* (Meyer & Rowan, 1977). According to this sociological theory, organizations and states tend to embrace myth and ceremony, which is highly progressive, internationalized language, as a way to acquire global legitimacy without making any changes to their day-to-day activities. Such ceremonial adoption of the UN CRPD standards is reflected in the coding of Indonesia, where the language is highly normative, including the terms *Equal Human Rights* and the *Grace of Almighty God*. Although Law No. 8/2016 has changed the state to a strong legal presence on the international arena, the real internal arrangements are not necessarily linked with this rhetoric.

This disconnection is also reinforced by the fact that *Familialism* as a social structure still exists, whereby the state implicitly depends on the family unit and not the public infrastructure to take care of the vulnerable conditions of its citizens. This constitutes to why, with a transformative legal framework, stagnation of physical actuality is still prevalent, a reality evidenced by the severe deficit in health center accessibility. Families in the Indonesian setting serve as a cushion to state non-action; state is able to keep the *myth* of rights alive due to the social expectation of family care, which ensures the implementation gap does not result in a systemic crisis. As a result, the *Social Architecture* of civic responsibility is still at the stage of rhetoric and consequently, a landscape of symbolic inclusion is established without such material base.

This deep-rooted Familialism is, essentially, the institutionalization of the policy decoupling at the state level. The use of highly progressive language in international human rights conventions in the Indonesian legislation with Law number 8/2016 gives the illusion of a transformation from the State. In contrast, the severely inadequate physical infrastructure, including the overwhelming lack of disability-friendly Puskesmas,

reveals that the state actually transfers many of its material obligations to the private home sphere. The family unit becomes an informal, unpaid infrastructure as it carries out the built environment's systemic failures and physically moves and cares for the disabled person. This dependency makes necessary local implementation engineering less urgent: since families are continually building their own resilience to the challenge of exclusion, the cost to state actors of policy decoupling is low. Thus, the symbolic luxury of the normative rhetoric "Protection and Empowerment" persists, while the physical environment continues to deny basic social citizenship to those it is supposed to protect.

In order to overcome the present paralysis of symbolic inclusion, both countries need to think critically toward the *Interactional Nature of Disability* (Shakespeare, 2014), assuming that disability is not a personal characteristic or a defect that can be identified by a physician, but rather a dynamic interaction or friction between the impairment and the unaccommodating environment of a person. This outlook, hence, plays a crucial role, since it removes the burden of change from the individual and frames it as an issue of infrastructure within the state.

To the extent that Indonesia has already incorporated this model in its laws and language, the coding of the *Disability Interaction Definition* in Indonesia confirms the formalization of this model. Indonesian government has therefore made an autonomous obligation by establishing a definition of disability as an outcome of engagement with the environment and its impediments. However, existing statistics are indicative of a deeper inadequacy in meeting this requirement: when the legislature is aware that the disability is caused by the environment, the persistent lack of disability-friendly facilities is not only a logistical slowdown, but also a systematic infringement of the right to live without artificial impediments. Thus, it is necessary for the state to go beyond normative endorsement or merely declaring the existence of rights, to Implementation Engineering in order to realize the Golden Indonesia 2045 vision. This involves institutionalization of measurable, audited standards of the built environment, so that the social Architecture becomes finally equalized with the legal rhetoric.

In the case of Japan, to be immersed in the interactional model, a shift from Productivist Utility to Social Citizenship is necessary. While Japan has been exceptional on the technical side of implementation, such physical solutions are mostly regarded as instruments of work rather than as means of belonging. Within the framework of Society 5.0, its future trajectory entails breaking down such persistent social barriers identified in its own coding, namely, the ideas and practices that retain people with disabilities in the state of Harmonious Segregation. Inclusion is only possible when the interaction of the individual with the environment is not only physical, but also social. By aligning physical infrastructure with a more sociological understanding of interaction, both countries can be free of the *Social Policy Paradox* and proceed to a true architecture of belonging.

Analysing the design and implementation of these systems through the lens of the Most Different Systems Design (MDSD), this comparative study demonstrates how both countries, despite their vast differences in socio-economic, historical and institutional backgrounds, end up in the same systemic crisis, defined as the Social Policy Paradox. Japan, with a highly industrialised and ageing society, utilises a dogmatic Productivist Welfare Model that promotes high physical compliance but leads to significant social isolation. In Indonesia, the rights-based model is implemented to foster deep normative discourse, while the infrastructural record is relatively sluggish. Given that two distinct socio-political architectures suffer from a systemic failure in realizing disability rights as real inclusion, the international disability rights paradigm, which has been largely shaped by Western legal frameworks, has severe structural tensions when transplanted into Asian variants of welfare. The economic function approach of East Asia and the highly symbolic, spiritually law-bound approach of Southeast Asia are unable to resolve the dynamic friction between an individual's impairment and an unaccommodating environment. A paradigm shift is needed to resolve the deadlock; it is about changing the notion of technical expertise from Japan, which has been characterized by rigid economic utility, and shifting the humanistic rhetoric of Indonesia into physical, measurable and auditable architecture.

CONCLUSION

This study concludes that the Social Policy Paradox in Japan and Indonesia is a direct outcome of their underlying welfare architectures. In Japan, the Productivist Welfare Model has successfully driven world-class physical accessibility as a means of economic utility, ensuring that persons with disabilities can participate in the workforce. This functional success, however, often leads to Harmonious Segregation, where physical inclusion does not necessarily translate into organic social belonging. Conversely, Indonesia's Rights-based

Model provides a strong humanistic and normative foundation, yet it remains hindered by Policy Decoupling. The Indonesian state relies on deep-rooted Familialism to manage care, leading to a severe stagnation in physical infrastructure. To bridge the aforementioned gaps, both nations must move beyond normative endorsement or functional utility toward Implementation Engineering and Social Citizenship. Inclusion, thus, can only be realized when the physical environment is equalized with legal rhetoric, transforming the built environment into a true Architecture of Belonging.

While this paper offers a critical analysis of the 2024/2025 disability policy environment in Japan and Indonesia, several limitations should be noted. Firstly, this study will be based mainly on the primary legal documents and official government reports. Although they provide a clear blueprint of the intention of the state, they do not always reflect the lived experience and the daily life of people with disabilities in such spaces. Second, the discussion is based on national-level policy structures. With decentralization, especially in Indonesia, local-district implementation and such can differ in practice compared to the national requirement, which is a subtlety that cannot be fully reflected in a macro-level study. Lastly, given that the research paper examines the 2024/2025 policy window, the long-term effects of recent legislative changes, including the 2024 policy mandating the private sector in Japan, are yet to be realized. This paper, therefore, encourages further research in the following areas.

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AUTHOR CONTRIBUTIONS

Shanon Wangner Santoso: Conceptualization, Methodology, Writing, Review & Editing, and Visualization.
Silfia Asning Tias: Conceptualization, Validation, Resources, Writing, Review & Editing.

DECLARATION OF COMPETING INTEREST

The authors declare no known financial conflicts of interest or personal relationships that could have influenced the work reported in this manuscript.

DECLARATION OF ETHICS

The authors declare that the research and writing of this manuscript adhere to ethical standards of research and publication, in accordance with scientific principles, and are free from plagiarism.

DECLARATION OF ASSISTIVE TECHNOLOGIES IN THE WRITING PROCCSS

The authors declare that Generative Artificial Intelligence and other assistive technologies were not excessively utilized in the research and writing processes of this manuscript.

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