Applied Human Factors and Ergonomics (AHFE2025), Vol. 199, 2025, 271–278
https://doi.org/10.54941/ahfe1006839

Identifying Approaches to an Accessible Society for Persons With Disabilities Through an Eight-Country Comparison

Yoshito Dobashi

Kanazawa Institute of Technology, Department of Environmental Design and Innovation, College of Information Design, Nonoichi, Ishikawa 921-8501, Japan

ABSTRACT

Japan's 1993 New Long-Term Programme introduced four accessibility barriers—physical, system, information/culture, and psychological—which have guided policy for more than three decades. This paper reassesses this framework through an international comparison with seven countries (U.K., Finland, Australia, U.S., Thailand, India, and Vietnam), focusing on mobility and daily movement. Information obtained from semi-structured interviews with resource persons in each country and insights from Japanese experts were integrated to identify common themes and differences. Findings indicate that while no other government has a classification like Japan's, common themes exist across several contexts, notably human rights, implementation/enforcement, and finance/affordability. Japan's strongest advances lie in physical accessibility, but the rights perspective and practical implementation still need to be strengthened. This paper recommends retaining the four-barrier framework while adding human rights as a foundational lens and incorporating implementation/execution and finance/affordability as cross-cutting indices for measurable improvement.

Keywords: Accessibility, Physical, System, Information, Emotional

INTRODUCTION

Since 1993, the Japanese government has focused on accessibility for persons with disabilities (PWDs) in the context of four barriers: physical, system, information/culture, and psychological. This framework provided a common language for public and private actors and has supported policy development (Cabinet Office, n.d.) (Cabinet Office, 2002). Since then, social, technological, and legal aspects of accessibility have evolved markedly through new building codes, improved transport, and the spread of ICT and AI, and the government ratified the Convention of the Rights for Persons with Disabilities (CRPD). However, no comprehensive review has been conducted of this four-barrier framework.

This paper re-examines the four barriers based on an international comparison focusing on mobility. By integrating the views of knowledgeable stakeholders in seven countries and Japanese experts regarding whether the framework should be modified in light of current practice, common themes were identified that might help develop Japan's approach.

This paper is based on a previous study by Dobashi (Dobashi, 2024), with revisions and additions.

REVIEW OF PREVIOUS STUDIES

Previous studies in Japan tended to emphasize awareness and practice and not theory-building. Mori and Goto (2005) highlighted difficulties in recognizing barriers. Ariga (2004) argued for stepwise institutional progress and noted that emotional barriers cut across other categories. Yajima and Muraoka (2010) documented student attitudes but paid limited attention to structural barriers. Overseas literature (AKEA, n.d.) (Australian Federation of Disability Organizations (afdo), n.d.) frequently references attitudinal, institutional, and communication barriers and challenges in compliance and enforcement. As far as is known, no study has comprehensively re-examined Japan's four-barrier framework through a structured international comparison focusing on mobility.

REVIEW OF THE PROGRESS IN ADDRESSING THE FOUR BARRIERS IN JAPAN

Physical: Legal instruments progressed from the 1994 Heartful Building Act to the 2000 Transportation Accessibility Improvement Law and their 2006 consolidation as the Barrier-Free Act. The Ministry of Land Infrastructure, and Tourism (MLIT) (Ministry of Land Infrastructure and Transport (MLIT), various years) repeatedly revised its targets for trains, buses, taxis, airports, public buildings, roads, and parks, addressing level differences, wayfinding, and accessible toilets.

System: Despite the increase in accessibility initiatives since 1993, the Citizens' Committee to Eliminate Disqualifying Clauses on Disability (CCEDCD, 2020) has reported a rise in disqualifying clauses, particularly in relation to mental/psychological disabilities, while government-led changes in white papers and justice reforms have been incremental.

Information/culture: In the process of ratifying the UNCRPD, Japan formally recognized sign language as a language. In 2022, the Act on Measures to Promote Information Accessibility and Communication was enacted, such that ICT and AI have begun to play a growing role in providing access to information and services.

Psychological/emotional: The Universal Design 2020 Action Plan, formulated in conjunction with the Tokyo Olympic and Paralympic Games, embedded 'barrier-free mind' education across compulsory schooling. However, public opinion surveys consistently show concern about discrimination, suggesting that attitudes change slowly and require sustained effort.

PURPOSE AND METHODOLOGY OF THE RESEARCH

Purpose: This study assesses whether the four-barrier framework should be modified or extended after three decades of practice, based on the assumption that additional cross-cutting themes would better address current needs.

Methodology: In addition to a review of previous studies, semi-structured interviews were held with PWDs, academics, and civil-society/industry experts in Japan and seven other countries. Interviewees were selected for their expertise and availability, and they each provided a written summary after their interview.

The above literature review and interviews were conducted in compliance with the code of ethics of the university to which the author is affiliated ("Ethics review of research involving human subjects" approval nos. 2301004 & 2311002).

SOURCES OF INFORMATION

Knowledgeable resource persons in seven countries provided definitions and reported on commonly discussed barriers, as well as policies and practices in transport accessibility, in their respective countries. In some cases, their names and affiliations have been withheld for political reasons; nevertheless, their evidence-based observations provide grounded insight into the situation in their countries.

INTERVIEWEES AND THEIR COMMENTS ABOUT THEIR COUNTRIES

U.K. (Dr. Roger Mackett, Emeritus Professor, Transport Studies, University College of London): There is no formal list of 'barriers', but policy measures address a range of challenges relevant to PWD mobility. Low-floor buses, audio-visual displays, and disability-awareness training for drivers support accessibility. Many operators offer travel-assistance cards and discounted rail cards, and a mobile app coordinates station navigation and assistance (ramps, luggage help, visual support). The 2018 Inclusive Transport Strategy (Department for Transport, 2018) foregrounds rights awareness and enforcement, staff training, better information, inclusive infrastructure, and new technology. Investment has been significant, yet full coverage and consistency remain to be achieved (Mackett, 2017).

Finland (Dr. Hisayo Katsui, Associate Professor, Disability Studies, University of Helsinki): A human rights-based approach forms the basis of disability policy and accessibility. The Non-Discrimination Act (1325/2014) prohibits discrimination, and an ombudsman oversees its compliance. Accessibility is classified into *esteettömyys* (physical access) and *saavutettavuus* (non-material access to information and services). Door-to-door mobility services are available for persons with severe disabilities, but support for persons with sensory disabilities remain insufficient. Forthcoming legal consolidation aims to base services on individual needs, including expanding personal assistance, rather than on a medical model, and to reduce regional inequalities.

Australia (Dr. Jane Bringolf, Chair, Centre for Universal Design Australia): National and state-level frameworks exist, but enforcement power and funding vary. Housing is a major accessibility challenge, though a new code is expected to expand supply. Employment discrimination remains a frequent complaint. Public transport offers ramps and level-entry train cars but only

to a limited extent in conventional trains and stations, especially outside major cities. Disability Transport Standards prohibit discrimination across modes. Attitudinal barriers, including media and journalism language, shape public understanding. There is potential to develop accessible tourism as an economic opportunity.

U.S. (Mr. Thomas Rickert, Retired Founder & Executive Director, Access Exchange International (AEI), former World Bank consultant): The ADA prescribes detailed technical standards for fixed-route transit—including ramps, slopes, handrails, doorway dimensions, priority seating, and destination signage—and establishes capability-based eligibility for paratransit. After three decades, most buses have become accessible, and programs have also been launched that fund accessible vehicles and provide technical assistance. However, auto dependence and low-density settlement patterns mean that substantial populations lack viable public transport, so approaches necessarily vary by metropolitan context. Moreover, the accessibility policy does not apply to areas where adequate public transport is available to non-disabled people.

Thailand (Resource person T., Manager, CSO working with DPOs in Thailand (name withheld by request)): The UN has praised the progressiveness of Thai disability laws, but implementation remains inconsistent (Committee on the Rights of Persons with Disabilities, 2016). Commonly cited barriers include the physical environment, laws and regulations, policy capacity, communication, and public attitudes/understanding. Information-access standards are limited, and rural areas lag behind urban settings. The UN committee recommends accessible communication formats and investment in human resources to support persons with visual and hearing disabilities. Stronger enforcement and deeper engagement of PWDs in policymaking are recurring needs. While there is a good framework, practice remains limited.

India (Dr. Anjlee Agarwal, Founder & Executive Director, Accessibility, Mobility & WASH Specialist, Samarthyam, India): Political will and administrative mindset are critical to transport accessibility. Beyond physical and infrastructural barriers, attitudinal and institutional barriers persist, and installation does not guarantee proper use and maintenance. Since the 2010 Commonwealth Games and especially the movement from 2015, the country has issued new codes, guidelines, and manuals for universal accessibility across modes. However, policy should more strongly emphasize first/last-mile connectivity and SARA (safety, accessibility, reliability, affordability) while extending coverage beyond urban areas, given that most PWDs live in rural areas.

Vietnam (Resource person V., Director, CSO supporting accessibility improvement in Vietnam (name withheld by request)): Physical, ICT, and societal/attitudinal barriers are widely recognized. Laws set timelines for renovating existing facilities and standards for new buildings, but enforcement is weak and attention tends to focus on physical disability. Transport policies need to comply with national codes and provide discounts or free services primarily for wheelchair users, but concrete targets and timelines are scarce. Progress since the 1990s includes numerous decrees and

standards, but unmet targets point to issues in public awareness, resources, governance, and DPO advocacy.

ANALYSIS AND DISCUSSION

Overview of interviews and cross-country patterns: No country mirrors Japan's four-barrier framework, but there are many comparable policies and practices. Physical and information barriers are widely addressed; psychological/attitudinal barriers persist; and system/institutional barriers affect feasibility. Table 1 shows a summary of all keywords. Several areas not covered by the four-barrier approach, namely human rights, implementation/enforcement, and finance/affordability, appear consistently as cross-cutting perspectives for improving transport accessibility.

The information obtained from the resource persons was discussed with learned experts in Japan. They included Mr. Satoshi Sato (Secretary General, DPI Japan), Dr. Satoshi Kose (Emeritus Professor, Shizuoka University of Art and Culture), Mr. Katsunori Fujii (President, Japan Council on Disability (JCOD)), and Dr. Akihiro Mihoshi (Emeritus Professor, Kinki University).

Views of Japanese experts: Stakeholders from DPI Japan, academia, and JCOD suggest reviewing the four barriers from the perspective of rights and building an evaluation tool that integrates rights, implementation, and finance. Emotional barrier is best treated as a cross-cutting element related to all other categories, shaping perceptions, behavior, and the incorporation of accessible design.

Implications for Japan: The largest advances have been made in physical and information accessibility, represented by widespread infrastructure upgrades and legal recognition of communication needs. To accelerate progress, Japan should focus on human rights as a foundational concept, strengthen implementation (usage of priority facilities, maintenance, enforcement, and monitoring) (MLIT, 2021), and reinforce financing such as by adopting a shared-cost transport model that increases resources earmarked for accessibility while maintaining affordability (MLIT, 2021) (Railway Policy Section of Railway Bureau, 2021). The rights of PWDs have long been disregarded (Hayashi and Okuhira, 2001) (Bookman, 2020). This was criticized in the UN Concluding Observations in 2022 (UN Committee on the Rights of Persons with Disabilities (UNCRPWD), 2022). Realizing accessibility in transport would provide measurable outcomes and a model for other domains.

In addition to the aforementioned keywords, future studies should also focus on disaster prevention management to support PWDs, as a lesson from the 2024 Noto Peninsula Earthquake, which severely impacted the lives of older adults and PWDs comprising almost half the population.

Table 1. Re-examining the Four Barriers: Comparison of Eight Countries (Source: Information collected by the author through interviews).

Main Category	Physical		System/ Policy			Information/ Knowledge/ Communication		Attitude/ Social/ Structural	Rights	Implementation	Finance	Others
Sub-category	Physical	Houses	System	Regional differences	Employment/ Education	Information	Communication	Emotional	—	—	—	—
Country/ Japan	Physical		System	—	—	Culture and information		Psychological	—	—	—	—
U.K.	Physical					Information	Communication	Psychological/ Social	Rights		Financial	Physiological
Australia	Public transport/ Tourism	Houses/ Buildings	Policy	Local government/ Community transport	Employment			Attitude	Disability rights	Implementation		Media and journalism
Finland	Physical/ Public transport	Houses	Non-material/ Structural/ Service		Education/ Employment	Information		Attitude	Human rights	Implementation		
Thailand	Physical environment		Policy / Data	Differences between metropolitan and rural areas	Education/ Employment	Information	Communication	Attitude and understanding	Human rights	Constitution / Legal compliance		Digital and communication Platform
India	Physical buildings / Transport		Policy / Plan	Focus on urban areas	Comprehensive approach			Understanding	Rights	Enforcement / Implementation / Maintenance	Finance / Affordability	Design / Reliability/ Safety
U.S.	Physical		Paratransit transport	Differences between rural and urban areas		Cultural and information		Attitudinal / Psychological	Civil rights		Finance / Affordability	Measurable results
Vietnam	Physical		Social services			Information / ICT		Societal / Social attitude	Disability rights	Legal constraint / Auditing	Combining social and economic activities	

CONCLUSION: NEXT ACTION AND EXPECTED RESULTS

A pragmatic path forward is to retain the four barriers while explicitly adding the perspectives of human rights, implementation/execution, and finance/affordability and treating emotional barriers as a cross-cutting element. There is much that Japan can learn from other countries in creating an inclusive society. A multi-stakeholder review—including PWDs, DPOs, academics, public administrators, and transport operators—should define metrics, targets, and reporting cycles to track progress. Doing so would bring domestic practice in line with international experience and support a more inclusive mobility system in Japan.

ACKNOWLEDGEMENT

This work was supported by JSPS KAKENHI Grant Number JP21K14259.

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