

Article

A comparative study of disability welfare policies in Nordic countries and Indonesia

by

Saharuddin Daming
Law Lecturer
Ibn Khaldun University
Indonesia
E-mail: daming@uika-bogor.ac.id

Prihatini Purwaningsih
Law Lecturer
Ibn Khaldun University
Indonesia
E-Mail: prihatinipurwaningsih@yahoo.co.id

Mufidatul Husna
Bachelor of Law
Tazkia University
Indonesia
E-mail: mufidatulhusnadaming@gmail.com

Denisa Aulia
Bachelor of Law
Ibn Khaldun University
Indonesia
E-Mail: 308denisa@gmail.com

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Abstract

The implementation of disability welfare policies demonstrates how welfare state principles are operationalized in practice. This study focuses on examining the structural and institutional foundations of disability welfare governance, with particular focus on labor market inclusion as a central operational dimension in Nordic countries and Indonesia. Using a qualitative, comparative socio-legal approach grounded in welfare state theory, the research analyzes anti-discrimination legislation, social security systems, accessibility policies, and monitoring mechanisms in Norway, Sweden, Finland, and Indonesia, based on statutory frameworks, policy documents, and secondary statistical data.

The findings indicate that Nordic disability governance is characterized by long-term institutional consolidation, integrated monitoring systems, and embedded enforcement mechanisms within welfare systems that are characterized by comparatively high levels of social protection expenditure. Indonesia demonstrates formal normative convergence through comprehensive legislation, yet implementation operates within a decentralized administrative structure that is marked by evolving coordination mechanisms and differentiated subnational capacity.

The comparative analysis recommends that Indonesia undertake structural reforms by strengthening inter-agency policy coordination, improving enforcement mechanisms, institutionalizing systematic disability data collection, and embedding disability welfare within a coherent rights-based governance framework. These lessons highlight that effective disability welfare requires not only formal legal recognition but also integrated institutional design and sustained political commitment.

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Introduction

The evolution of the legal state has engendered the modern welfare state in which government is assigned a much wider role than ensuring order and security to one that actively fosters social and economic well-being (Stahl, 2009). Unlike the *laissez-faire* minimalism of the *Nachtwächterstaat* model, social rights are institutionalized through transfer commitments, universal service provision, and codified arrangements of social protection (Esping-Andersen, 1991). In comparative research, the Nordic countries—Norway, Sweden, and Finland, in particular—have often been identified as having social democratic welfare regimes that are characterized by universality, high levels of decommodification, and high public responsibility for mitigating social risks (Ferragina & Seeleib-Kaiser, 2011).

Disability labor market inclusion constitutes a central dimension of contemporary welfare governance. Globally, approximately 16% of the population lives with some form of disability (World Health Organization, 2022), yet labor market exclusion remains disproportionately high (OECD, 2022). Although Nordic welfare systems are often referenced as advanced in promoting social inclusion, significant structural differences exist between these countries (Esping-Andersen, 1991) and Indonesia in terms of fiscal capacity, administrative coordination, and social protection coverage (OECD, 2019). Such variation raises important questions regarding how disability welfare is institutionally designed, enforced, and operationalized across different welfare configurations (Tschanz, 2022).

Existing scholarship has extensively examined Nordic welfare regimes (Fritzell et al., 2001) and, separately, disability governance in Indonesia (International Labour Organization, 2026). However, only limited research has systematically compared the structural governance of disability labor inclusion between Nordic countries and Indonesia within a socio-legal framework (Béland and Petersen, 2014). Much of the discussion on policy transfer risks either idealizing the Nordic model or portraying Global South systems in deficit terms, without sufficiently examining the institutional conditions that shape implementation outcomes (Pojani, 2020).

This paper adopts a comparative institutional perspective to analyze how disability welfare is governed in Norway, Sweden, Finland, and Indonesia (Esping-Andersen, 1991). Rather than assessing policy success in normative terms, the study examines institutional architecture, legal enforceability, fiscal commitment, and administrative coordination as determinants of disability labor inclusion (Allott, 1980). By integrating welfare state institutionalism, socio-legal implementation gap analysis, and governance and enforcement capacity perspectives, the paper seeks to explain how differences in institutional design and state capacity shape disability labor inclusion across differently configured welfare systems (Enriquez & Centeno, 2013).

Theoretical Framework

This study is grounded in welfare state institutionalism—particularly, the social democratic welfare regime identified by Gøsta Esping-Andersen in *The Three Worlds of Welfare Capitalism*. Esping-Andersen conceptualizes welfare systems not as isolated policy choices but as historically embedded institutional arrangements that structure the relationship between state, market, and society. His typology distinguishes between liberal, conservative-corporatist, and social democratic regimes. The latter—commonly associated with Finland, Norway, and Sweden—is characterized by universal social provision, strong state responsibility, and a normative commitment to equality and social citizenship. Rather than classifying Indonesia within this typology, this study employs the Nordic social democratic model as a comparative institutional reference point. The objective is not hierarchical evaluation but analytical contrast in order to understand how different institutional traditions shape welfare governance.

Beyond regime typology, this research incorporates governance and state capacity perspectives as complementary analytical lenses. Drawing on governance scholarship such as that of R. A. W. Rhodes (Rhodes, 1997), governance is understood as the coordination of public policy across institutional networks rather than solely through hierarchical state command. Welfare institutions operate within complex inter-organizational environments, where policy outcomes depend on administrative coordination, regulatory design, and enforcement mechanisms. In this sense, the governance perspective allows examination of how disability employment

policy is structured, implemented, and monitored across different institutional settings.

In addition, the study integrates insights from state capacity literature, as developed in comparative political sociology by scholars such as Peter B. Evans and Theda Skocpol. State capacity refers to the institutional ability of the state to design, implement, and enforce public policy effectively. Variations in administrative capability, fiscal infrastructure, and regulatory enforcement influence how welfare commitments translate into practical outcomes. By combining welfare regime theory with governance and state capacity perspectives, this study analyzes both the structural foundations and the operational dynamics of disability employment policy across different institutional contexts.

Writing method

A qualitative comparative socio-legal design (Millns, 1999) based on welfare state institutionalism is used in this study (Esping-Andersen, 1991). The institutional framework that oversees disability employment inclusion in Norway, Sweden, Finland, and Indonesia serves as the analytical unit (Mahoney & Thelen, 2009). The structure of legal norms, administrative structures, and enforcement methods within each national context is the main focus of the analysis.

There is no primary empirical fieldwork involved in the study; instead, it uses secondary statistical data and documentary analysis (Bowen, 2009). Three main data sources are used. First, primary legal materials, such as laws, rules, and frameworks for policies pertaining to social protection, employment inclusion, and disability rights (Chynoweth, 2008). Second, institutional reports and statistical publications from organizations such as the World Bank, the OECD, and the WHO (Bowen, 2009), which provide macro-level indicators concerning disability prevalence, labor market participation, and social protection expenditure. These data are used descriptively to illustrate structural and fiscal variation rather than for econometric analysis (Creswell, 2007). The third source of data comprises academic scholarship on welfare state regimes (Esping-Andersen, 1991), disability governance (OECD, 2008), and socio-legal implementation theory (Selznick, 1969).

A structured literature review was conducted to situate the study within existing research (Snyder, 2019). Relevant publications were identified through academic databases using defined keyword combinations (Petticrew & Roberts, 2006). Inclusion criteria focused on studies addressing welfare state institutional design, disability-related governance, or comparative social protection systems. Studies limited to clinical or medical dimensions of disability without governance analysis were excluded (Tranfield et al., 2003).

Comparative analysis is conducted at the structural level, operationalizing the theoretical framework through five analytical dimensions (Hall & Soskice, 2001): (1) legal enforceability, (2) institutional coordination, (3) fiscal commitment, (4) monitoring and accountability mechanisms, and (5) labor market activation strategies. This approach enables examination of the implementation gap between formal rights recognition and institutional practice across different welfare configurations (Selznick, 1969).

The objective is not to advocate policy transplantation but to identify structural elements that may inform context-sensitive reform within Indonesia's distinct socio-legal and administrative setting.

Analysis

Norway

Norwegian Equality and Anti-Discrimination Act

The official policy of the Norwegian government is to protect people with disabilities from discriminatory practices and to promote an inclusive system across national, regional, and community life. The legal framework—particularly the Equality and Anti-Discrimination Act—prohibits discrimination against persons with disabilities in areas such as education, employment, transportation, and public services (Prinz, 2003). This regulation provides a clear legal safeguard and establishes institutional obligations for both public authorities and private actors.

Norway is frequently recognized within comparative welfare scholarship as having developed relatively comprehensive equality mechanisms, supported by administrative oversight and accessible complaint procedures. Institutions such as the Equality and Anti-Discrimination Ombud contribute to monitoring compliance and reviewing cases of alleged discrimination (Bauge & Løvdal, 2022). When cases arise, they are processed through established legal and administrative channels, allowing individuals to seek formal remedies (Halliday et al., 2007).

Norway's relative strength lies in the institutional consistency with which legal norms are integrated into administrative practice. The enforcement architecture reflects a high level of regulatory consolidation, supported by accessible complaint mechanisms and established legal review procedures. This configuration reflects a high degree of institutional coordination and fiscal embedding within Norway's welfare state model.

Social Security and Health System

The Norwegian government maintains a comprehensive social security and healthcare framework that provides integrated support for persons with disabilities (Jacobsen, 2024). Access to medical treatment, rehabilitation, and long-term care is institutionalized within a universal welfare system. Rehabilitation programs typically involve multidisciplinary teams—including doctors, physiotherapists, occupational therapists, and psychologists—with associated costs covered by the public system. Such arrangements are designed not only to maintain health but also to facilitate sustained participation in education, employment, and community life (Morris, 2006).

In terms of income security, Norway provides disability-related benefits intended to secure stable living standards (Kildal & Kuhnle, 2005). Individuals who are unable to work are entitled to disability pensions, while those temporarily outside the labor market may access unemployment benefits within the national social insurance framework. These provisions operate within an administrative system characterized by continuity, monitoring, and long-term fiscal commitment (Greve, 2012).

From an institutional perspective, this integrated welfare architecture reflects a high degree of coordination between healthcare provision, income protection, and labor

market measures (Lægreid & Christensen, 2007). The system is structured to minimize fragmentation and to ensure continuity of support across the life course (Askim et al., 2011).

Accessibility and Decent Accommodation Policy

The Norwegian government has developed what is frequently regarded as one of the most advanced accessibility and accommodation frameworks for persons with disabilities. Beyond allocating substantial financial resources within the national budget, Norway has undertaken a systemic transformation of both public and private infrastructure to ensure inclusive and barrier-free services (Disability Federation of Ireland, 2016). Since the early 2000s, railway stations, terminals, public roads, government buildings, commercial centers, restaurants, recreational facilities, and multimodal transportation systems—covering land, sea, and air—have been progressively redesigned in accordance with universal design principles (Øksenholt & Aarhaug, 2016).

This transformation is reinforced through active monitoring and responsive local governance. When infrastructure is reported to be inaccessible, municipal authorities dispatch technical teams to assess and rectify the issue in order to maintain conformity with universal design standards (Grangaard, 2024). Such administrative responsiveness reflects the integration of accessibility obligations into routine governance practices rather than treating them as exceptional accommodations (Setijaningrum et al., 2024).

‘Living Conditions Survey’ Program

The Norwegian government implements the Living Conditions Survey program as a systematic instrument for monitoring and evaluating policies related to the welfare and empowerment of persons with disabilities (Halvorsen et al., 2017). Conducted regularly by Statistics Norway, the survey collects comprehensive data on income, housing, employment, health, education, and social participation. The program functions not merely as a statistical exercise but as a governance tool: findings are used to identify policy gaps, assess the effectiveness of existing measures, and design corrective interventions (Statistics Norway, 2025).

Through this evidence-based approach, disability policy in Norway is embedded within a continuous cycle of assessment and policy refinement. The existence of a unified and reliable national database enables domicile mapping, targeted service delivery, and the development of tailored empowerment programs (Bonoli & Natali, 2012). In this sense, data collection is institutionally integrated into the broader welfare state architecture, thereby reinforcing the principles of inclusion and equal citizenship.

Finland

Finnish Disability Equality Act (Equality Act)

The Finnish government demonstrates a sustained institutional commitment to the empowerment and welfare of persons with disabilities. One of the most significant manifestations of this commitment is the Non-Discrimination Act, which establishes a comprehensive legal framework aimed at preventing discrimination on the grounds of disability (United Nations, 2025). Through this policy, the Finnish government promotes inclusion across various spheres of life, seeking to foster a society in which persons with disabilities are protected from stigma, stereotypes, and prejudice. Finnish citizens with disabilities are legally entitled to equal respect, protection, and rights without discrimination or harassment. Media institutions in Finland have also contributed to public discussions on disability-related issues, helping to maintain societal awareness and sensitivity (Hästbacka & Nygård, 2013).

The effectiveness of equality provisions is supported by relatively coherent administrative structures and established enforcement mechanisms (Nousiainen, 2022). Equality norms are embedded within Finland's broader social democratic welfare configuration, in which regulatory oversight and complaint procedures are institutionalized within the governance framework (OECD, 2021). This configuration reflects a consolidated approach to disability governance, where legal recognition is accompanied by administrative follow-through.

Disability Policy

Another notable and progressive initiative is Finland's national disability policy framework, developed and implemented under the coordination of the Ministry of Social Affairs and Health (Ministry of Social Affairs and Health, 2026). This policy framework promotes the full participation of persons with disabilities in all areas of social life and affirms the recognition and protection of their rights. It emphasizes equality, accessibility, and non-discrimination, ensuring that individuals with disabilities are able to express themselves, participate in decision-making processes, and engage in education, employment, and community life without stigma, stereotypes, or prejudice (Ministry For Foreign Affairs Of Finland, 2023).

The Finnish disability policy operates within a strong legal and institutional structure, including the Non-Discrimination Act and other equality regulations (Katsui, 2025). Acts of discrimination—whether committed by public officials or private individuals—may lead to administrative or legal sanctions, such as formal warnings or corrective measures. The Finnish government prioritizes preventive strategies, public awareness campaigns, and institutional training to strengthen respect for disability rights (Ministry of Social Affairs and Health, 2023). This approach reflects a broader commitment to building an inclusive society in which persons with disabilities can live independently and with dignity.

From an institutional perspective, Finland's disability policy illustrates how legal guarantees, enforcement structures, and sustained awareness-building efforts are integrated within a coordinated welfare governance model.

'Assistive Technology' and Education Program

The Finnish government provides extensive technological support for persons with disabilities. A wide range of technologically advanced facilities is made available, either through imports or developed domestically through national technological expertise, engineering, and the advancement of appropriate technologies. These tools are designed to help people with disabilities to overcome daily life challenges and include mobility aids for those with physical disabilities, sensory aids for individuals who are blind or speech-impaired, and sophisticated therapeutic and

occupational tools. All of these facilities are provided entirely free of charge by the government (Krangnes, 2016).

There are four major categories of technology utilized for children with disabilities in Finland:

- a. Assistive technologies, which are designed to increase the independence and self-initiative of children with special needs.
- b. Communication devices, which are divided into traditional and technological devices. Traditional devices include augmentative and alternative communication tools and simple communication boards, whilst technological devices comprise electronic speech equipment and computer-based communication programs.
- c. Learning software, which is widely used by children with specific learning difficulties.
- d. Educational robotics as a concretizing tool, which helps children to better understand abstract concepts by assembling physical models. The robotics resemble LEGO-type models in various forms, such as vehicles, buildings, and more (Jormanainen et al., 2007).

In addition, the Finnish government pays particular attention to meeting the educational needs of children with more severe disabilities. They are provided with specialized education programs tailored to support their individual needs and development (Department for Developmental Policy, 2018).

The Finnish model illustrates governance through institutional mainstreaming rather than quota-based enforcement.

Sweden

Swedish Disability Equality Act (Discrimination Act)

Through the Discrimination Act (Diskrimineringslagen), the Swedish government establishes a comprehensive legal framework prohibiting discrimination on the grounds of disability. The implementation and monitoring of this regulation are

overseen by the Equality Ombudsman, which is mandated to supervise compliance, handle complaints, and promote equal rights. The Act covers multiple sectors, including employment, education, healthcare, social services, and access to goods and services. It also requires reasonable accommodation to ensure that persons with disabilities are not disadvantaged in public or private settings.

Rather than positioning this framework as inherently superior, it is analytically appropriate to understand it as part of Sweden's broader institutional architecture, where anti-discrimination norms are embedded within administrative practice and supported by established enforcement mechanisms. Studies, including those reported by the Organisation for Economic Co-operation and Development (OECD, 2016), indicate that Sweden's regulatory approach has contributed to gradual shifts in public awareness and institutional responsiveness toward disability inclusion. Within Sweden's consolidated welfare governance structure, equality norms are institutionally integrated into policy implementation processes (OECD, 2016).

Disability Policy

Sweden places strong emphasis on the empowerment and active participation of persons with disabilities across key areas such as education, employment, and accessibility (Szczupał & Mazurek, 2025). This policy framework is embedded within Sweden's universal welfare state model, which provides extensive public support in sectors such as education and healthcare (Fredriksson, 2024). Services are publicly funded and structured to ensure broad access, including for individuals with varying levels of functional capacity.

In the field of employment, comprehensive anti-discrimination regulations require both public and private institutions to ensure equal opportunities for persons with disabilities, including flexible working arrangements and equitable access to career advancement and income benefits comparable to those of other citizens (International Labour Organization, 2013). Employers are legally obligated to provide accessible environments and reasonable accommodations that enable employees with disabilities to perform their duties effectively.

Sweden also maintains a robust social security system that provides disability-related allowances and supplementary benefits tailored to individual circumstances. These benefits are designed to prevent economic vulnerability and to support independent living (Hemmings & Prinz, 2020).

In addition, the Swedish government promotes entrepreneurship through the 'Support to Start a Business' program (Stöd till start av egen näringsverksamhet), administered by the Swedish Public Employment Service (Norstedt & Germundsson, 2023). This initiative provides financial assistance and professional training to individuals seeking to establish their own businesses. Persons with disabilities with reduced work capacity are eligible to receive start-up grants to cover essential operational needs during the initial phase of business development (Swedish Public Employment Service, 2023). This program reflects Sweden's broader commitment to labor market activation and inclusive economic participation.

Accessibility

The Swedish government has developed comprehensive accessibility policies aimed at ensuring the effective realization of disability rights through inclusive and user-friendly environments. Municipal authorities across Sweden are mandated to remove barriers in public services and infrastructure in order to facilitate the participation of persons with disabilities in social, economic, and civic life (Lemaire & Kerr, 2017). Accessibility measures implemented by both public and private actors are grounded in universal design principles, ensuring that buildings, transportation systems, workplaces, and public facilities are usable by all individuals regardless of ability (Müller, 2023).

This commitment extends beyond physical infrastructure to include non-physical accessibility, such as reasonable accommodation in employment, education, and service provision. Universal design has been progressively integrated into planning standards and administrative practice, contributing to high levels of accessibility across many sectors. National objectives and policy benchmarks guide municipal authorities and regulatory bodies toward continuous improvement in transportation, workplaces, and public spaces (Zhao et al., 2021).

Accessibility obligations in Sweden are therefore institutionally embedded within the country's broader equality framework, supported by regulatory oversight and administrative implementation mechanisms (OECD, 2025).

Indonesia

Legal Framework and Institutional Architecture

Indonesia adopts a rights-based approach to disability through Law No. 8 of 2016 concerning Persons with Disabilities. This legislation represents a paradigmatic shift from a charity-based perspective toward a human rights framework aligned with the principles of the United Nations Convention on the Rights of Persons with Disabilities (CRPD) and its Optional Protocol (A/RES/61/106), which was adopted on 13 December 2006 at the United Nations Headquarters in New York, and was opened for signature on 30 March 2007. The law guarantees equality before the law, non-discrimination, accessibility, reasonable accommodation, and full participation in social, economic, and political life (Agave et al., 2023).

Institutionally, disability governance involves multiple ministries, including the Ministry of Social Affairs, Ministry of Education, Ministry of Manpower, and other sectoral bodies at national and subnational levels. To strengthen monitoring and oversight, the government established the National Commission for Disability (KND), which was mandated to evaluate and monitor the fulfillment of the rights of persons with disabilities. The presence of this supervisory institution indicates an effort to embed disability rights within the formal administrative architecture of the state (Simbolon, 2024).

From a normative standpoint, Indonesia's legal framework reflects convergence with international disability rights standards. The effectiveness of these guarantees, however, is shaped by broader governance dynamics, which will be addressed in subsequent sections.

Education and Affirmative Inclusion

In the field of higher education, the Indonesian government has introduced affirmative measures to expand access for students with disabilities. One of the

principal initiatives is the Beasiswa ADik (Afirmasi Pendidikan Tinggi) Disabilitas scholarship program, administered by the Ministry of Higher Education. This scheme provides tuition fee coverage and living allowances to students with disabilities pursuing tertiary education (Nugroho et al., 2024).

The program demonstrates the integration of disability inclusion into national higher education policy, particularly through financial accessibility mechanisms. By reducing economic barriers, the policy seeks to expand participation in formal education pathways (Wabes & Rahaju, 2026).

Beyond policy instruments, representation of persons with disabilities in strategic public positions also reflects evolving institutional openness. Individuals with disabilities have held public office, including positions within national human rights institutions (Yulianto et al., 2023), indicating that formal barriers to political and administrative participation have been progressively reduced. These developments illustrate expanding opportunity structures within Indonesia's governance system.

Social Protection and Labor Policy

Disability inclusion in Indonesia is also embedded within broader social protection and labor policy frameworks. Social assistance programs administered by the Ministry of Social Affairs provide targeted support to persons with disabilities, particularly those experiencing economic vulnerability (Daulay, 2025). Employment quota regulations require public institutions and private enterprises to allocate a specified proportion of positions to persons with disabilities (Fatria & Sardi, 2021).

In addition to quota mechanisms, vocational training and entrepreneurship programs aim to enhance economic participation. These instruments reflect an attempt to integrate disability inclusion within national labor and welfare strategies.

From a policy design perspective, Indonesia has established regulatory and programmatic tools to promote socio-economic inclusion. Their implementation, however, interacts with broader labor market characteristics and administrative coordination structures, which influence practical outcomes (Singgir et al., 2025).

Accessibility and Inclusive Development

Accessibility standards in Indonesia are formally regulated through national legislation and sectoral policies covering public infrastructure, transportation, education facilities, and public services. Regulatory provisions mandate barrier-free design and reasonable accommodation in public spaces and institutions (Setiawan, 2026).

In recent years, inclusive development discourse has gained increasing attention within urban planning and public service reform initiatives. Several municipalities have introduced accessible public facilities and disability-friendly service centers, reflecting incremental progress in infrastructure adaptation (Maimaiti et al., 2025). Accessibility governance in Indonesia operates within a decentralized administrative system. As such, implementation is shaped by regional planning capacity, fiscal allocation, and institutional prioritization at provincial and municipal levels (Sutrisno et al., 2024).

Results

This section brings together findings from policy analysis in Norway, Sweden, Finland, and Indonesia by evaluating how welfare state principles are operationalized through four main dimensions: legal framework, institutional coordination, labor market activation, and accessibility.

Legal Framework and Enforcement of Rights: Between Integration and Specialization

The analysis reveals fundamental differences in legal architecture. The Nordic countries have shifted from fragmented disability laws toward integrated codification under a universal equality framework (e.g., the Equality and Anti-Discrimination Act in Norway and the Non-Discrimination Act in Finland) (Tøssebro, 2016). This reflects the Institutional Welfare model, where disability rights are embedded in general citizenship rights (Strand, 2014).

In contrast, Indonesia uses a *lex specialis* approach through Law No. 8/2016. Although normatively comprehensive and aligned with the CRPD (Rahmadhani et al.,

2025), Indonesia faces challenges in enforcement. In the Nordic countries, disability rights are enforced through mature administrative mechanisms and strong ombudsman systems (Gugushvili et al., 2025), whilst in Indonesia, their effectiveness still depends heavily on capacity and political will at the sub-national level, post-decentralization (Setiawan, 2026).

Institutional Coordination

This study found that the success of the Nordic model is supported by very close cross-sectoral coordination (Kjellberg, 2023). NAV in Norway, for example, functions as a single entry point that integrates social services, health, and employment assistance (Duell et al., 2009). This institutional coordination ensures that policies do not just remain on paper.

In Indonesia, the establishment of the National Commission on Disability (KND) is an important milestone, but inter-agency coordination is still in its infancy (Mulyawan, 2025). Data fragmentation between ministries often results in overlapping or unsynchronized services (Virgy & Mikail, 2025). This comparison shows that bureaucratic maturity and data integration are key differentiators between established and developing welfare models.

Labor Market Participation: Activation Strategy vs. Quota System

Table 1 Labor Market Participation

Country	Employment Rate of Persons with Disabilities	Source	Reporting Year
Norway	Above 40%	Statistics Norway	2020
Finland	Above 40%	Washington Group	2025
Sweden	Above 50%	Statistics Sweden	2024
Indonesia	18.7%	ILO	2025 (refers to 2023 data)

Note: Figures represent the most recent officially available national statistics. Differences in reporting years reflect national publication cycles. Cross-country comparisons should be interpreted with caution due to variations in measurement definitions and survey methodologies.

Table 1 presents the most recent officially available data on the employment rate of persons with disabilities across four countries. Reporting years differ due to variations in national statistical release cycles; however, all figures fall within the 2020–2025 period, ensuring reasonable temporal comparability.

Available data indicate that the employment rate of persons with disabilities exceeds 40% in Norway (Statistics Norway, 2020) and Finland (Washington Group, 2025), and surpasses 50% in Sweden (Statistics Sweden, 2024) depending on measurement definitions and working-age criteria. Although national survey instruments are not perfectly identical, they consistently reflect comparatively high levels of labor market participation within Nordic welfare systems.

Indonesia records a significantly lower employment rate of persons with disabilities at 18.7%, based on the latest statistics published by the International Labour Organization (2025). Despite the existence of a legally mandated employment quota system (2% for the public sector and 1% for the private sector) under Law No. 8/2016, implementation and enforcement challenges continue to constrain labor market inclusion (Republik Indonesia, 2016). However, this discussion notes that without fiscal incentives and a strict monitoring system like Finland's, quotas in Indonesia are often seen as an administrative burden (Manuaba et al., 2022). The transformation from a passive protection model (social assistance) to an active model (work empowerment) requires stronger technological and educational infrastructure support.

Synthesis of Structural Barriers and Implementation Gaps

Despite differences in fiscal capacity, there are similar structural barriers in the four countries, which are synthesized as follows:

1. **Productivity Norms and Stigma:** In the Nordic countries (particularly Norway, Sweden, and Finland), very high productivity standards in a competitive labor market are a major barrier for persons with disabilities (Halvorsen et al., 2016). A similar situation exists in Indonesia's formal sector, where employers tend to avoid the costs of reasonable

accommodation because it is considered to reduce efficiency (Abrianto & Tinambunan, 2025).

2. The Decentralization Paradox: In Sweden and Indonesia, decentralization gives regions autonomy to manage disability services (Mulyadi et al., 2024). However, this creates a 'geographical lottery,' where service quality and accessibility are highly dependent on the financial conditions and commitment of local governments.
3. The Social Security Dilemma (Disability Trap): There is a challenge where stable benefit systems in the Nordic countries sometimes inadvertently discourage individuals from working for fear of losing social benefits (European Progressive Studies, 2014). In Indonesia, the challenge is the opposite: social security that does not cover the entire population forces persons with disabilities to remain in the unprotected informal sector (Rhesa Adisty et al., 2023).

Data Gap: All four countries acknowledge that the lack of real-time, integrated data hinders the evaluation of the long-term impact of work activation policies (Overbye, 2019). Indonesia, in particular, is still struggling to develop a Disability Information System capable of accurately mapping the needs of individuals across the country (United Nations, 2022).

Conclusion

This study has examined disability labor inclusion through a comparative institutional lens, focusing on Norway, Sweden, Finland, and Indonesia. The analysis demonstrates that although all four countries formally recognize disability rights within their legal systems, variation emerges in the degree of institutional consolidation, enforcement routinization, fiscal embedding, and coordination density.

The Nordic cases illustrate how disability inclusion becomes structurally embedded when legal enforceability, monitoring systems, labor activation strategies, and welfare financing are integrated within mature administrative frameworks. At the same time, persistent employment gaps in these countries indicate that even comprehensive

welfare systems do not fully overcome structural labor market barriers. Welfare generosity alone does not automatically ensure labor market parity.

Indonesia presents a different institutional configuration. The adoption of Law No. 8 of 2016 and the establishment of supervisory institutions reflect significant normative and legislative progress. Quota-based employment obligations and targeted social assistance programs demonstrate formal commitment to disability inclusion.

However, implementation operates within a decentralized administrative structure characterized by uneven subnational capacity, fiscal constraints, and labor market informality. These structural conditions shape the translation of rights into employment outcomes.

Rather than framing the comparison in hierarchical terms, this study highlights how disability labor inclusion is mediated by institutional architecture and state capacity.

Differences across cases reflect variation in governance configuration, fiscal depth, and administrative routinization, rather than divergence in normative recognition.

The findings suggest that strengthening disability inclusion requires attention not only to legal reform but also to coordination mechanisms, monitoring infrastructure, and sustained institutional embedding within broader welfare and labor market systems.

Future research may further explore how institutional layering and subnational capacity influence disability employment outcomes in diverse welfare contexts.

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