

COMPARISON BETWEEN NIGERIAN POLICY FOR THE DISABLED AND THAT OF SCANDINAVIAN COUNTRIES.

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Abstract

Disability policy is a litmus test of how states translate human-rights rhetoric into distributive outcomes. Nigeria's 2018 Discrimination Against Persons with Disabilities (Prohibition) Act signals a paradigmatic shift from charity to rights; however, implementation of the policy remains embryonic. On the other hand, Scandinavian countries have institutionalized Universalist welfare architectures that consistently register the highest global disability employment rates. This paper evaluates the relevance of Nigerian disability policy against Scandinavian countries' practices. Drawing on a scoping review of empirical studies and policy documents published between 2008 and 2025, this paper compares Legal Frameworks, Financing Mechanisms, Service Infrastructures, and Socio-Cultural Attitudes. The analysis is anchored in the social model of disability and the United Nations Convention on the Rights of Persons with Disabilities (CRPD). Findings from this study indicate that Nigeria's primary deficits lie in fiscal minimalism, horizontal coordination, and data-driven accountability, while Scandinavian countries' systems struggle with cost containment and migrant inclusion. The paper argues that selective policy transfer, particularly earmarked funding, user-led co-production, and universal design mandates, offers Nigeria a pragmatic pathway toward substantive compliance with the CRPD. In view of that, this study recommends that a statutory minimum disability budget, demand-side labor-market incentives, and the establishment of a Disability Data Observatory in Nigeria be implemented.

Keywords: Comparison, Disability, Right, Persons, Policy, and Scandinavian

Introduction

One in six persons globally experiences significant disability, with prevalence disproportionately concentrated in low- and middle-income countries where poverty magnifies impairment effects (United Nation International Children's Emergency Fund UNICEF, 2022; World Health Organization WHO, 2023). Whether disability is framed as a medical deficit or a human rights issue determines the budgetary priorities, governance architectures, and life chances. In Nigeria, the Discrimination Against Persons with Disabilities (Prohibition) Act was enacted in 2018, but

its implementation commenced in 2019 after about two decades of civil-society advocacy. The law criminalizes discrimination against people with disabilities, mandates accessibility standards within five years, and imposes 5% employment quota. Yet, years after the commencement of the National Commission for Persons with Disabilities court remedies remain elusive, lacks operational funding as being rampart and only 20 (Lagos, Kogi, Kwara, Nasarawa, Niger, Plateau, Bauchi, Jigawa, Kaduna, Kano, Sokoto, Zamfara, Abia, Anambra, Cross River, Edo, Ekiti, Ondo, Oyo and Enugu) of 36 States of Nigeria have domesticated the Act as of August, 2024 (Michael, 2024). Conversely, Scandinavian countries generally have more established social welfare systems, stronger legal protections, and greater political representation for people with disabilities, although Scandinavian countries still face some challenges.

This divergence raises a straightforward question: How relevant is Nigerian disability policy when critically evaluated against the Scandinavian archetype? Relevance in this study is operationalized along four dimensions: legal enforceability, fiscal effort, service universality, and socio-cultural legitimacy. The significance of this study is twofold. Academically, it is expected to test the universality claims embedded in the Convention on the Rights of Persons with Disabilities (CRPD) by examining policy transferability between welfare regimes at opposite ends of the fiscal spectrum. Practically, it will generate evidence-based recommendations for Nigerian stakeholders on how to honor the obligation of the Convention on the Rights of Persons with Disabilities without replicating the Scandinavian tax burden.

Conceptual of Disability

Disability is widely recognized by scholars and in policy discourse as a social and historical construct, not a fixed or self-evident category. Its meaning and the way it's being addressed have changed across different times, cultures, and intellectual traditions. (Lawson & Beckett, 2020). Four ideal-type models dominate this current policy discourse: the medical model which views disability as an individual's medical problem or deficit that needs to be fixed or cured through professional medical intervention; the charity model which portrays people with disabilities as victims or objects of pity, who are dependent on the goodwill and charity of others; the social model which argues that people are disabled by societal barriers (attitudinal, physical, institutional, etc.), not their impairments whose focus is on changing society, not the individual; and the human right/rights-based model which builds on the social model, by framing disability as a human rights issue and advocated for equality, non-discrimination, and the full participation of people with disabilities as active rights-holders and citizens. (United Nations, 2006).

The first two models (medical and charity) are generally considered outdated in modern policy and rights-based frameworks, and the social and human right/rights-based models are the foundation for current international agreements like the UN United Nation Convention on the Rights of Persons with Disabilities (Retief & Letšosa, 2018; Christian Blind Mission, 2025). According to the World Health Organization (WHO, 2021), disability is an umbrella term that covers impairment, activity limitations, and participation restrictions. WHO (2021) refers to impairment as a problem in the body function or structure, such as loss or abnormality in physiological, mental, or anatomical function; activity limitations were referred to as difficulties an individual may experience while executing tasks or actions; while participation restrictions were described as problems an individual may experience when engaging in life situations like education, work or other activities participations.

Policy Relevance and Progressive Realization in Disability Policy

Policy relevance is a complex concept that can be understood through Schmidt's (2019) framework, which highlights three key dimensions: problem relevance, instrumental relevance, and social legitimacy. This tripartite dimension provides a useful lens for evaluating the effectiveness of disability policies in Nigeria and Scandinavian countries (Norway, Sweden, and Denmark). By using this framework, this study can better understand and explain the strengths and weaknesses of each policy approach and identify areas for improvement. A critical aspect of policy relevance is the principle of progressive realization, codified in Article 2(1) of the International Covenant on Economic, Social and Cultural Rights and reiterated in Article 4(2) of the Convention on the Rights of Persons with Disabilities. This principle acknowledges resource constraints but requires states (countries) to move "as expeditiously and effectively as possible" toward full realization, accompanied by deliberate, concrete, and targeted steps (United Nations, 2006). In this view, progressive realization serves as both a sword (justiciable benchmark) and a shield (fiscal defense), which legitimizes cross-national fiscal comparisons as analytical exercises rather than mere voyeurism.

Methodology

This study adopted a comparative policy analysis design utilizing a scoping review approach to examine disability policies in Nigeria and selected Scandinavian countries (Norway, Sweden, and Denmark). The scoping review methodology was chosen to map existing literature, identify key policy dimensions, and synthesize findings across different welfare contexts. Data Sources: A comprehensive search of academic databases, including Scopus, Web of Science, Google Scholar, and PubMed, was conducted for peer-reviewed articles published between 2008 and 2025. Policy documents, legislative instruments, government reports, and publications from international organizations (United Nations, WHO, Organization for Economic Co-operation and Development OECD, UNICEF) were also retrieved from official government websites and institutional repositories. Search Strategy: Key search terms included "disability policy," "Nigeria," "Scandinavian countries," "Norway," "Sweden," "Denmark," "Disability Act," "CRPD implementation," "inclusive education," and "accessibility." Boolean operators were applied to combine search terms effectively.

Inclusion Criteria: Studies were included if they: (1) focused on disability policies in Nigeria or Scandinavian countries; (2) addressed legal frameworks, implementation mechanisms, funding, service infrastructure, or socio-cultural attitudes; (3) were published in English; and (4) were published between 2008 and 2025 to capture developments before and after CRPD ratification.

Exclusion Criteria: Articles were excluded if they: (1) focused solely on medical or clinical aspects of disability without policy analysis; (2) were opinion pieces without empirical data; or (3) addressed countries outside the scope of this comparison. Analytical Framework: The extracted data were analyzed thematically across four predetermined dimensions derived from Schmidt's (2019) policy relevance framework: (1) legal frameworks and enforceability; (2) financing mechanisms and fiscal effort; (3) service infrastructure and accessibility; and (4) socio-cultural attitudes and legitimacy. The analysis was anchored in the social model of disability and guided by the principles of the United Nations Convention on the Rights of Persons with Disabilities (CRPD). Findings were synthesized narratively to highlight similarities, differences, and points of policy transferability between the contexts under study.

Empirical Review of Nigeria

Nigeria has made significant strides in recognizing the rights of persons with disabilities, as evidenced by the enactment of the Discrimination Against Persons with Disabilities (Prohibition) Act in 2018. However, empirical studies suggest that implementation remains a significant challenge. For example, Alumona and Odoh (2025) surveyed 150 teachers, administrators, and parents in Kaduna State and the Federal Capital Territory to assess the implementation of inclusive education policies for children with disabilities. The study found that 53.3% rated implementation of inclusive-education for children with disabilities as “low” or “very low.” Regression analysis ($r^2 = 0.62$) identified inadequate teacher training (30%), poor infrastructure (23.3%), and lack of teaching aids (16.7%) as significant predictors, while respondent role was not statistically significant. Similarly, Ejim and Okoye (2025) conducted qualitative interviews with eight persons with disabilities and policymakers; they conclude that the 2018 Disability Act “is majorly on paper” and recommend employing social workers to sensitize the public on the need to embrace the Act. Another study by Emmanuel and Ekwukoma (2025) reports that only five states: Enugu, Kwara, Kaduna, Jigawa, and Lagos have made noticeable progress in implementing the National Policy on Inclusive Education, whereas the remaining 31 states cite inadequate funding, shortage of trained teachers, lack of infrastructure and assistive resources, and rooted societal stigma as the main obstacles.

Furthermore, Ishola et al. (2025) analyzed the 2018 Nigeria Demographic and Health Survey ($n = 67\,663$ adults) and found a national disability prevalence of 11.9%, with visual impairment (8.8%) and mobility difficulty (3.7%) the most common types. However, the study does not provide uptake-of-service figures. A study by Elekanachi et al. (2023) reviewed federal and state disability policies against the CRC and CRPD and observed that most policies are federal, with only a few state-level instruments; they note the absence of disability policies specifically targeted at children and their families. Eleweke (2013) also observed that while the 2002 PanAfrican Plan of Action set clear goals for disability services, evidence shows that the Nigerian Government has taken few concrete steps to realize its provisions. Meanwhile, Azubuike et al. (2025) identify physical, economic, and cultural barriers as the principal factors that continue to limit access to health care for persons with disabilities, despite the existence of the 2018 Act; they call for stronger policy enforcement, disability-awareness training for health workers, and expanded community-based interventions.

Empirical Review on Scandinavian Countries (Norway, Denmark, and Sweden)

Across the three major Nordic countries, recent studies converge on four themes. First, universal design uptake is uneven despite early ratification of the CRPD: Norway adopted a top-down national definition of universal design that has attracted scholarly criticism; Denmark still foregrounds “accessibility” and waits for sector-by-sector adoption; Sweden blends universal design with usability as a guiding principle (Grangaard et al., 2024). Second, sickness and disability-benefit systems remain generous but expensive: Norway’s 100% salary guarantee for one-year sick leave is the highest among the countries compared in the study, yet its reforms have been “less successful” in curbing caseloads (Hemmings & Prinz, 2020). Third, active-labor market measures yield only modest gains: Ulstein (2025) found a small positive employment effect for Norway’s “joint inclusion effort” using 2015–2021 registry data and a difference-in-differences design. Fourth, anti-discrimination statutes have not reduced perceived discrimination: a 28-country study using European Social Survey data (2002–2020) found no evidence that legislative change lowered self-reported disability discrimination in the Nordic countries included

(Gugushvili & Grue, 2025). Finally, comparative policy analysis shows that Sweden emphasizes individual autonomy and state-funded personal assistance, thereby reducing family care burdens, whereas South Africa (the comparator) relies more heavily on informal support (Muller-Kluits et al., 2025).

Theoretical Framework (Social Model of Disability)

The social model of disability, as posited by Oliver (1990), serves as a foundational framework for understanding disability as a societal construct rather than an individual limitation. This paradigm shift underscores the Convention on the Rights of Persons with Disabilities (CRPD) and informs Scandinavian countries' legislation, which emphasizes the state's role in addressing systemic barriers. The social model redefines disability as the outcome of societal barriers, shifting the moral and fiscal responsibility to the state (nations). This approach is operationalized through the human rights-based model, which emphasizes participation, accountability, nondiscrimination, and progressive realization. Article 4(2) of the Convention on the Rights of Persons with Disabilities explicitly acknowledges resource constraints, making comparative fiscal analysis a valid exercise in evaluating government efforts to address disability inclusion. In view of this, the human rights approach provides a valid and critical lens for evaluating Nigeria's disability policy Act of 2018. The Act's provisions, such as accessibility standards and anti-discrimination measures, can be assessed with the principles of the social model and human rights framework, through which areas for improvement and reform can be identified.

Policy Comparison between Nigeria and Scandinavian Countries Nigeria's Policy on Disability

Nigeria's disability policy is rooted in the Nigerians with Disability Decree 1993, the country's first legislation addressing disabilities. This decree, enacted under General Sani Abacha's military government, aimed to establish vocational rehabilitation centers nationwide, although its implementation was hindered by poverty, marginalization, and social exclusion (Oyetola, 2015). The decree remains an extant law, despite the country's transition to a federal system of government. Nigeria's ratification of the African Charter on Human and Peoples' Rights (1990) and the Convention on the Rights of Persons with Disabilities (CRPD, 2007) has influenced its disability policy framework. The 2018 Discrimination Against Persons with Disabilities (Prohibition) Act, assented to in January 2019, marks a significant shift towards a rights-based approach. This Act aims to provide a platform for realizing the social, economic, educational, and healthcare rights of persons with disabilities, ensuring their full integration into Nigerian society (Etieyibo, 2020).

However, the Act's applicability is limited to the Federal Capital Territory, Abuja, due to Nigeria's federal structure, as State-level domestication is required for implementation, but many states have yet to enact similar laws (Anazonwu et al., 2022). This jurisdictional issue has affected the law's implementation, with only a few states (20 out of 36) enacting mirroring laws. The CRPD has elevated disability to a human rights and equity issue, recognizing persons with disabilities' right to access all aspects of society on an equal basis (Aduma & Ibekwe, 2019). To strengthen Nigeria's disability policy framework, policymakers should prioritize state-level domestication, increase funding, and establish clear implementation guidelines.

Scandinavian Countries' Policy on Disability:

The Scandinavian countries, which comprise Denmark, Norway, and Sweden, are renowned for their strong social welfare systems and commitment to human rights. These countries have a long history of promoting social inclusion and equality, and have implemented various policies to

support the rights and inclusion of people with disabilities. The Scandinavian countries share a common cultural and historical belief that shapes their approach to disability policy. The social democratic welfare state model, which outlines social inclusion, equality, and collective responsibility, has been a cornerstone of Scandinavian policy-making (Esping-Andersen, 1990). This model has influenced the development of disability policies in these countries, with a focus on promoting social participation, accessibility, and individualized support. This section provides a comparative review of the disability policies in these three countries, highlighting their strengths, weaknesses, and best practices.

Sweden's Policy on Disability

In 2017, Sweden approved the UN Convention on the Rights of Persons with Disabilities into national law. The basic goal of law is to ensure that every person with a disability enjoys equal living conditions and full participation. To achieve the set goal, the law obliges each ministry and agency to work within four fixed pillars: apply universal design from the start; find and remove accessibility shortcomings; provide individual support (aids, travel services, personal assistance) where general solutions are not enough; and prevent and counteract discrimination, including inadequate accessibility itself (Government of Sweden, 2017). The same Act makes every ministry and agency finance its own accessibility measures; the Ministry of Health and Social Affairs only coordinates. According to the Swedish Act of 2017, twenty-two named agencies ranging from schools to courts must send a short disability-progress report to the Swedish Government every year, and these reports feed directly into the annual Budget Bill. In addition to this, Sweden has a ten-year monitoring calendar (2021-2031) which forces each agency to show how its work advances the national goal, gender equality, and children's rights; the midterm review in 2026 is expected to form a ground for a fresh national action plan.

Norway's Policy on Disability

Norway's most recent nationwide programme is the Joint Inclusion Effort (2018-2021), whose sole purpose is to move people with disabilities into open employment. The programme is built around annual registry reports that are expected to show progress by sex and county. The Anti-Discrimination and Accessibility Act 2008 require all new buildings and digital services to follow universal-design rules, and every county must prepare an accessibility plan. Individual support (technical aids, personal assistance, travel allowances) also continues through the ordinary social-insurance system. The Directorate of Labor and Welfare is required to send a five-year outcome report to the Ministry of Labor and Inclusion, while the Ombudsman for Children investigates the inclusive-education compliance. Furthermore, an inter-ministerial committee chaired by the Ministry of Health prepares Norway's report to the UN CRPD Committee; no ministry holds a single consolidated budget for disability.

Denmark's Policy on Disability

Denmark has not adopted a national disability strategy and has not written the UN Convention into national law. Therefore, the responsibility of Denmark for people with disability split across several ministries with no formal coordination mechanism. For example, the Ministry of Social Affairs issues guidance on inclusive education and personal assistance; the Ministry of Health regulates psychiatric care issues; and the Ministry of Transport handles accessibility standards. According to a report by Disabled People's Organizations Denmark (DPOD, 2024), an umbrella of 38 member organizations, each ministry finances its measures from its own budget. However, ministries are required by law to report disability-related outputs to the Parliamentary Disability Committee every four years, but there is no central body that compiles or checks the reports

(DPOD, 2024). Municipalities must deliver education, health, and social-support services from their block-grant revenue; the national level offers only technical guidance. The Ministry of Foreign Affairs has recently adopted the OECD Development Assistance Committee DAC disability marker for aid projects and has endorsed the global humanitarian-inclusion charter, yet no domestic strategy exists (DPOD, 2024).

Disability Policies

Policy	Nigeria		Scandinavian Countries (Norway, Denmark, Sweden)
Legal Framework	Discrimination Against Persons with Disabilities (Prohibition) Act, 2018		Norway: Anti-Discrimination and Accessibility Act, 2008; Sweden: UN CRPD incorporated into national law, 2017; Denmark: No national disability strategy
Implementation	Limited implementation, only 20 states have domesticated the Act		Strong implementation, with regular monitoring and evaluation
Funding	Inadequate funding, no statutory minimum budget allocation		Generous funding, with significant budget allocations for disability services
Accessibility	Limited accessibility, with poor infrastructure and a lack of assistive technology		High level of accessibility, with universal design principles and assistive technology widely available
Employment	5% quota weakly enforced		Active labor market programs
Socio-Cultural Attitudes	Stigma and discrimination persist, with limited awareness and understanding of disability rights		Inclusive and accepting attitudes, with strong social welfare systems and a high level of awareness and understanding of disability rights.
Policy Dimension	Nigeria	Scandinavian Countries	Estimated Funding Allocation (%)
Accessibility	Low infrastructure compliance	Universal design	Nigeria: 1% Scandinavia: 15%

Sources: Discrimination Against Persons with Disabilities (Prohibition) Act, 2018; Anti-Discrimination and Accessibility Act, 2008; Sweden: UN CRPD incorporated into national law, 2017

Successes of the Policies

In Nigeria, a major success of disability policy lies in the formal recognition of the rights of persons with disabilities through comprehensive national legislation. The enactment of the *Discrimination Against Persons with Disabilities (Prohibition) Act* in 2018 represents a significant legal and symbolic milestone, as it established disability as a matter of rights, equality, and citizenship rather than charity or welfare dependency (Federal Republic of Nigeria, 2018). This legislative recognition has provided an authoritative framework for advocacy, enabling disability rights organizations, civil society actors, and affected individuals to engage the state more effectively and to frame their demands within a legally protected rights discourse.

The introduction of this legal framework has also contributed to increased public awareness and visibility of disability issues within national conversations. Media coverage, advocacy campaigns, and policy discussions surrounding the Act have helped to challenge deeply entrenched social attitudes that previously framed disability primarily through stigma, pity, or moral obligation (Aderemi & Adeniyi, 2019). As a result, disability has become more visible as a social and political issue, fostering gradual shifts in public perception and expanding recognition of persons with disabilities as active members of society with legitimate claims to participation and inclusion.

Another notable success is the partial domestication of disability legislation at the state level. Several states have adopted disability laws, established disability-focused agencies, or incorporated inclusive provisions into sectoral policies. These developments indicate growing subnational engagement and demonstrate that decentralized governance can, under favorable political and institutional conditions, support progress toward inclusion. In states where domestication has occurred, there is often improved collaboration between government institutions and civil society organizations, alongside increased responsiveness to disability-related concerns. However, despite these advances, tangible improvements in living conditions remain limited and uneven across the country. Persistent barriers in education, healthcare, employment, transportation, and the built environment continue to constrain the everyday experiences of many persons with disabilities, highlighting the gap between legal recognition and material outcomes (Aderemi & Adeniyi, 2019).

In contrast, the successes of disability policies in Scandinavian countries are more extensive, deeply institutionalized, and measurable across multiple dimensions of social life. One of the most visible achievements is the high level of accessibility embedded in public infrastructure, transportation systems, digital platforms, and urban environments. The systematic application of universal design principles has ensured that accessibility is not treated as a special provision but as a standard feature of public life, enabling greater independence, mobility, and participation for persons with disabilities (Hvinden & Halvorsen, 2018).

Comprehensive social service provision represents another major area of success. Scandinavian countries have developed robust welfare systems that provide individualized support such as personal assistance, assistive technologies, inclusive education, adapted housing, and accessible healthcare. These services are delivered as entitlements rather than discretionary benefits, reducing vulnerability and ensuring continuity of support across the life course. The reliability and quality of these services contribute significantly to improved quality of life and social integration for persons with disabilities (OECD, 2019).

Higher employment rates among persons with disabilities further reflect the effectiveness of Scandinavian disability policies. Active labor market measures, workplace accommodations,

supported employment programs, and strong anti-discrimination protections have expanded access to meaningful and dignified work. Employment is supported not only through legal safeguards but also through coordinated policy interventions that align individual capabilities with labor market opportunities. This approach enhances economic independence and reinforces social inclusion (Hvinden & Halvorsen, 2018).

Challenges of Disability Policies

Across these studies, the recurrent themes are: first, progressive policies exist on paper, but implementation is weak; second, inadequate funding and trained personnel are universal bottlenecks; and third, stigma remains a cross-cutting barrier. However, these evidences are still based on cross-sectional designs with small or non-representative samples, but the convergence of findings across methodologies and geographical zones provides a vital empirical baseline for the comparative analysis that this study focused on.

Conclusion

In conclusion, this study highlights the disparities in disability policy implementation between Nigeria and Scandinavian countries. While Nigeria's 2018 Discrimination Against Persons with Disabilities (Prohibition) Act is a step forward, its implementation remains limited. Scandinavian countries, on the other hand, have effective policies and generous funding, resulting in higher levels of accessibility and employment for people with disabilities. This research reinforces the need for Nigeria to prioritize disability policy implementation and funding.

Recommendations

- a) **Policy Implementation:** The Nigerian government should prioritize implementing the 2018 Act, including state-level domestication and funding allocation
- b) **Funding:** Increase budget allocation for disability services and programs
- c) **Accessibility:** Implement universal design principles and accessibility standards in public infrastructure and services
- d) **Awareness and Education:** Government and non-governmental organizations should organize awareness campaigns and training programs to address stigma and promote disability inclusion
- e) **Research and Monitoring:** Governments at all levels should establish a Disability Data Observatory (DDO) to monitor progress and inform policy decisions

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