

# Disability Rights in South Asia: A Comparative study of Legal and policy frameworks in India, Pakistan, and Bangladesh

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## Abstract

The present study, "Disability Rights in South Asia: A Comparative Study of Legal and Policy Frameworks in India, Pakistan, and Bangladesh," examines how disability laws and policies have changed in India, Pakistan, and Bangladesh. It dwells on the transition from welfare and medical models to rights-based models based on the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

**Research methodology:** The present paper uses a descriptive qualitative research design and looks at qualitative content analysis. It is mainly based on secondary sources such as government reports, scholarly articles, and legal documents. The study compares and contrasts the Indian, Pakistani, and Bangladesh laws. It also considers how international organizations, such as the South Asian Development Forum (SADF), the ASEAN Disability Forum (ADF), and the Asia-Pacific Disability Forum (APDF), influence policies for inclusion.

**Comparative analysis:** The analysis reveals that the laws on the rights of persons with disabilities in India, Pakistan, and Bangladesh are significant steps towards equality and inclusion. Nevertheless, there are still implementation, access, and social acceptance challenges. The paper highlights the importance of stronger institutions, improved collaboration, and attitude shifts to empower people with disabilities in South Asia.

**Keywords:** Disability discourse, legislation, Acts, and policies.

## INTRODUCTION

South Asian nations are a culturally rich and diverse region, home to one-quarter of the world's population and a large share of the world's poor. Socioeconomic, cultural and health factors play a complex role in disability in South Asia. The region comprises Afghanistan, Bangladesh, Bhutan, India, the Maldives, Nepal, Pakistan and Sri Lanka, which collectively have a significant population of people with disabilities. Health inequalities, lack of access to health services, lack of rehabilitation services, cultural attitudes and stigma are some of the factors affecting the lives of people with disabilities in the region. (Akram et al., 2025) In terms of policy, the "medical model" of disability has been replaced by the "social model" which seeks to address disability issues not at the level of the individual but at the level of society, and the necessary interventions in the fields of social policy and institutional practices. The medical model emphasises rehabilitation and is based on a sense of tragedy. As a result, many activists and academics engaged in disability studies in the Global North have rejected the "medical model" arguing that the

"medicalised" view locates problems in the "disabled body" that need to be repaired and cured through medical intervention. Surprisingly, the "medical model" rejected by some scholars in the Global North may still be relevant in the Global South, particularly in South Asia. (KC Hari.,2016) People with disabilities constitute almost 15% of the world's population, 80% of whom live in developing countries and are often poor. They have historically been stigmatised and discriminated against, facing barriers at systemic (no inclusive policies), physical (no accessible buildings) and informational (no sign language or interpreters) levels. Stigma leads to loss of opportunities in relationships, sexuality, marriage and family. (Roush and Sharby, 2011). Disability is typically defined as a disadvantage or impairment. It has multiple components, including impairments that can take the form of physical disabilities such as paralysis or blindness. It also includes activity limitations that may affect mobility. Finally, disabilities also involve participation restrictions that are caused by social factors, such as discrimination and prejudice against people with impairments or barriers to participating in everyday activities. (ICF, World report on disability,2011). Disability is a form of social oppression that includes the imposition of activity restrictions on people with impairments, and the socially constructed degradation of their psychological and emotional well-being. (Thomas 1999: 60). Disability is a result of social factors that arise from violence, such as war and economic inequalities. She uses a historical materialist approach to disability. She argues that impairments in the developing world are largely due to poverty and "imperialist violence". Overall, she considers disability to be a product of capitalism. (Erevelles2011) Disability studies is a new field that has advanced more in the Global North than in the Global South, with differences in the conceptualisation of disability. In the Global North, the transition from the "medical model" to different versions of the "social model" highlights that disabilities are caused by social barriers. This paper examines the legal provisions for people with disabilities in India, Pakistan and Bangladesh, and the shift in terminology, laws and policies. Disabilities affect around 15% of the world's population, with the majority living in developing nations, where they are often discriminated against and excluded. Although disability is a part of human diversity, it is important to consider the practical issues faced by people with disabilities, which can be obscured by romanticised notions of disability. In South Asia, the medical model still lingers, which may hinder the human rights discourse espoused by activists. The medical and social models of disability highlight the socio-cultural and economic barriers that limit social inclusion. Thomas argues that disability is a form of social oppression based on attitudes, whereas Erevelles argues that disability is a socially constructed outcome of violence and inequality. Therefore, a detailed analysis of the legal and policy frameworks in these countries is crucial to creating a more inclusive society for people with disabilities. The South Asian Development Forum (SADF), ASEAN Disability Forum (ADF) and Asia-Pacific Disability Forum (APDF) are instrumental in championing disability rights and inclusion in South and Southeast Asia. The SADF covers eight nations: Afghanistan, Bangladesh, Nepal, Bhutan, Maldives, Pakistan, and Iran, which together account for 25% of the world's population. It aims to empower people with disabilities and promote their equal involvement in development. The ADF, founded in 2011 in Bangkok, is a network of organisations promoting disability-inclusive policies in the ASEAN region. It promotes cooperation, exchange of information, and participatory policy development, adhering to the Bangkok Declaration. The APDF, a successor to the 1992 Osaka Forum and in line with the UNESCAP's Asia and Pacific Decade of Disabled Persons, focuses on raising awareness and ensuring the inclusion of persons with disabilities in society. These bodies work together to build a platform for policy and advocacy, which has led to the improvement of national laws in countries like India, Pakistan and Bangladesh.

## 1.2 objectives

1. To know the legal framework for persons with disabilities in South Asian countries.
2. To compare the legal framework for persons with disabilities in South Asian countries like India, Pakistan and Bangladesh.

## 1.3 Significance of the study

This paper reviews the legal framework and policies regarding persons with disabilities in South Asian countries, namely India, Pakistan and Bangladesh. It offers a glimpse of the national policies, acts and laws on disability from a historical and current point of view. The paper highlights the rights, opportunities and choices for persons with disabilities in different areas, such as social, medical, education and employment. This national and legal policy framework is designed to assist and guide persons with disabilities, and raise awareness about policies and acts

## 2. Research methodology

This study adopts a descriptive qualitative research design utilizing secondary resources such as official reports of these countries, research articles, policies, acts, and books on these countries, etc. The research critically and comparatively examines the disability legislation in India, Pakistan, and Bangladesh in light of similarities and differences in different sectors like education, employment, inclusion, accessibility, social security, and participation in every aspect, and policies of equality and non-discrimination towards them. Adopting a critical theory paradigm, the study delves into the legal texts of each nation. Diverse approaches have been applied to translate the document. The study is a rigorous framework for the comparative analysis of the policies and their implications across the South Asian countries. Furthermore, to know about the internal meaning of the policies and acts of the South Asian countries, qualitative content analysis has been employed because this research method exclusively deals with exploring the multiple meanings a text carries within itself.

## 3. Comparative Analysis and Discussion

### 3.1 National legislations for persons with disability in India.

Persons with Disabilities Act in India South Asia's legislative history of rights and inclusion of persons with disabilities (PWDs) is a remarkable and transformative one, moving from a welfare-based approach to a more comprehensive rights-based and inclusive policy approach. In India, this legal journey began with the Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995 (PWD Act, 1995). This landmark act was a crucial step towards the social integration of persons with disabilities, prioritizing key provisions, including free education for children with disabilities until the age of 18, 3% reservation in government employment, and crucial modifications for accessibility in public works (Government of India, 1995). Despite such noble initiatives, empirical realities painted a different story: almost 90% of children with disabilities were not in school in this period, highlighting a gap between the intentions of the act and its implementation (Kumar & Jha, 2017). The passing of the Rehabilitation Council of India Act in 1992 and the National Trust Act in 1999, further entrenched the framework for professional rehabilitation and guardianship systems, particularly in relation to persons with developmental and intellectual disabilities. But these initial policies largely favoured a medical model of disability, treating persons with disabilities as clients of welfare rather than as rights holders. The advent of the Rights of Persons with Disabilities Act (RPWD Act) in 2016, which replaced the 1995 Act, and aligned the Indian law to the United Nations Convention on the Rights of Persons with Disabilities

(UNCRPD) marked a shift in the paradigm. This landmark Act broadened the list of disabilities from seven to a visionary 21, now including autism spectrum disorder and cerebral palsy. This Act introduced critical concepts such as limited guardianship and reasonable accommodation and enshrined equality, dignity and accessibility as legal rights for people with disabilities (Government of India, 2016). Similarly, the Mental Healthcare Act of 2017 also took this recognition of mental health as a human right further, by mandating access to government-funded mental health care, banning discrimination, and decriminalising suicide. This act exhibits a more empathetic and human-rights-oriented approach to mental health (Ministry of Health & Family Welfare, 2017). However, despite such advancements, there are many challenges in enforcing accessibility orders, monitoring institutional compliance and ensuring representation of individuals with disabilities in education and employment (Indian Express, 2023). Primary Issues with national policies and acts reveal a disconnect between law and enforcement, with variations between states due to poor monitoring, lack of awareness among administrators, and lack of coordination. Public infrastructure, transportation and technology platforms lack accessibility, with many institutions not adhering to the RPWD Act (Indian Express, 2023). In the education sector, despite free and inclusive education until 18, low enrolment and retention of children with disabilities is attributed to a shortage of trained teachers and resources (UNESCO, 2019). To address these concerns, enforcement, periodic accessibility audits, teacher training and community mental health programs are needed. Better data gathering and coordination between agencies are crucial to turning India's disability rights policies into practice (Government of India, 2016; Indian Express, 2023).

### **3.2 Pakistan's National Legislation for Persons with Disabilities**

Pakistan's legislation in the field of disability has seen progressive development since the enactment of the Disabled Persons (Employment and Rehabilitation) Ordinance in 1981. This ordinance was significant in setting up the country's first employment quota system, which marked the first time during the International Year of Disabled Persons when the state recognised its role in the rehabilitation and placement of persons with disabilities. The employment quota was initially set at 1% and then raised to 2%, reflecting an increased inclusion. The creation of the National Council for Rehabilitation of Disabled Persons through this ordinance, was reflective of a systematised approach to support and advocacy (Government of Pakistan, 1981). In 2002, the National Policy for Persons with Disabilities further built on this, emphasising the need for prevention, early intervention and skill development as the building blocks for an inclusive society, to be achieved by 2025. But like India in its early legislative years, Pakistan's efforts tended to focus on charity and social welfare rather than empowerment, which was not always able to meet the transformative needs of the disabled (Malik, 2018). The National Plan of Action in 2006 marked a key milestone in providing a road map for 17 key intervention areas, including inclusive education, rehabilitation and public awareness-raising programs. It stressed the need for a concerted effort from multiple sectors to execute these strategies (UNESCAP, 2006). Later legislation, such as the Special Citizens Act (2008) and the Disabled Persons (Employment and Rehabilitation) Amendment Act (2015), aimed to enhance accessibility of transportation and building infrastructure, and also provide rebates in education, public transport fares, and small businesses. While these legislative changes have been progressive, the path to full implementation of the rights of the disabled is still being hampered. Inept bureaucratic frameworks and weak enforcement measures continue to pose obstacles to the implementation of these rights (World Bank, 2019). But, Pakistan's ratification of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) in 2011 was a historic moment. This international ratification laid the groundwork for the enactment of the Rights of Persons with Disabilities

Act in 2020, a landmark legislation that highlights essential themes such as non-discrimination, political participation and access to justice, employment and education. This is a significant step from a welfare-based approach to a more effective rights-based governance approach (Government of Pakistan, 2020). Legislation for persons with disabilities (PWDs) in Pakistan has progressed from the 1981 Disabled Persons Ordinance to the 2020 Rights of Persons with Disabilities Act, but remains under-implemented. Challenges such as limited institutional capacity, coordination and monitoring have impacted the implementation of quotas and accessibility guidelines (World Bank, 2019). Previous legislation was rehabilitation-centred (Malik, 2018) and recent programs suffered from lack of funding and cooperation (UNESCAP, 2006). Public spaces and education are not accessible, and employment discrimination continues despite quotas. Social stigma, particularly for women PWDs and those living in rural areas, also restrains their social inclusion (World Bank, 2019). To overcome these challenges, Pakistan must boost institutional accountability, conduct accessibility audits, incentivise inclusive employment, and scale up vocational training and awareness programs to implement the rights-based framework of the 2020 Act.

### **3.3 National Policy for People with Disabilities in Bangladesh**

The trajectory of disability laws in Bangladesh has paralleled a shift from welfare-based to inclusive and equal rights-based policies and legislation. The groundbreaking National Disability Policy in 1995 marked Bangladesh's first formal recognition of disability matters and was inspired by the UN Declaration on the Rights of Disabled Persons (1975) and the UN Standard Rules (1993). But this policy primarily took a medical model, framing disability as an individual tragedy needing rehabilitation, rather than emphasising the societal changes needed for inclusion (Hossain, 2016). The Disability Welfare Act of 2001 was a landmark in defining disability rights. This law called for critical areas of support, including inclusive education, health care and skills training, and also mandated job quotas to facilitate employment for people with disabilities. However, the implementation of these measures encountered significant challenges, including the lack of interdepartmental collaboration, data collection and community-based rehabilitation programs (Jahan & Rahman, 2018). A critical shift in policy came with the Rights and Protection of Persons with Disabilities Act in 2013. The Act took a progressive stance, incorporating the principles of the UN Convention on the Rights of Persons with Disabilities (UNCRPD), and embracing a rights-based approach, which seeks to promote equality under the law. It underscores crucial elements such as education and employment, and ensures that persons with disabilities are not exploited or discriminated against (Government of Bangladesh, 2013). Similarly, the Protection of Persons with Neurodevelopmental Disability Trust Act was introduced in 2013 to establish a trust that would protect the rights and well-being of people with autism, Down syndrome and cerebral palsy. These changes reflect Bangladesh's efforts to promote inclusive development. They support language inclusion through the recognition of sign language and respect civil rights, such as the right to vote and privacy. Despite these remarkable achievements, there is still a disconnect between the good intentions of policies and their implementation, especially in rural areas where inclusion and accessibility issues are most evident (UNDP, 2020). While Bangladesh has achieved some progress in disability law, from the National Disability Policy (1995) and the Disability Welfare Act (2001) to the Rights and Protection of Persons with Disabilities Act (2013), its implementation is deficient due to coordination, funding and capacity issues (Jahan & Rahman, 2018). Accessibility remains a problem, especially in rural areas, as does stigma and the dominance of the medical model which treats disability as a welfare concern (Hossain, 2016; UNDP, 2020). Inconsistent application of employment quotas and provisions for inclusive education limit the opportunities for people with disabilities (Government of Bangladesh, 2013). To address these challenges, Bangladesh should

strengthen monitoring and enforcement mechanisms, foster inter-ministerial coordination and provide adequate funding for accessibility and education. Bangladesh should also scale up community-based rehabilitation, conduct national disability surveys, and implement awareness-raising programs to further promote inclusion and rights (Government of Bangladesh, 2013; Jahan & Rahman, 2018; UNDP, 2020).

**3.4 Comparative analysis of national legislation for person with disability in south Asian countries with special reference to India, Pakistan and Bangladesh**

**Table 1**

Aspect	India	Pakistan	Bangladesh
<b>Initial legislation</b>	Person with disability Act (1995)	Disabled person (employment, and rehabilitation ordinance) 1981	National disability policy (1995) disability welfare Act (2001)
<b>Current legislation</b>	Right of person with disability act (2016)	Right of person with disability act (2020)	Right and protection of person with disability Act (2013)
<b>UNCRPD Ratification year</b>	2007	2011	2007
<b>Types of disabilities recognized</b>	21	19	Broad: includes neurodevelopmental disabilities
<b>Employment quota</b>	4% in government job and education	2% in public and private sectors	(1-2%) varies by institution
<b>Key institutions</b>	Rehabilitation council of India (1992),	National council for rehabilitation of disabled persons (1981), National policy (2002)	National coordination committee on disability, neurodevelopmental trust (2013)
<b>Policy approach</b>	Comprehensive right-based framework aligned with UNCRPD	Gradual shift from right-based to welfare-based approach	Right-based with focus on neurodevelopmental inclusion
<b>Major challenges</b>	Implementation and accessibility gaps	Weak enforcement and monitoring	Data limitation and inclusion barriers

As shown in table1, The legislative frameworks for people with disabilities (PWDs) in India, Pakistan and Bangladesh, as outlined in Table 1, demonstrate a common historical evolution from welfare-focused policies to more inclusive, rights-based approaches that draw inspiration from the UN Convention on the Rights of Persons with Disabilities (UNCRPD). India has the most advanced and institutionalised journey, from the Persons with Disabilities Act (1995) to the Rights of Persons with Disabilities Act (2016). The 2016 Act broadened the definition of disability from seven broad categories to twenty-one, introduced principles of reasonable accommodation and limited guardianship and provided for legal protection against discrimination in education, employment, and public spaces. It also enhanced institutional mechanisms through the Rehabilitation Council of India and the National Trust, providing a solid

framework for implementation and capacity building. Meanwhile, Pakistan's legislative progress has been slower but steadily evolved from its initial welfare focus in the Disabled Persons (Employment and Rehabilitation) Ordinance (1981) to the more inclusive Rights of Persons with Disabilities Act (2020). This more recent legislation, reflecting the impact of Pakistan's ratification of the UNCRPD in 2011, prioritises equality, non-discrimination and political engagement, and includes a 2% quota for employment of PWDs. However, this is limited by inadequate institutional capacity, awareness, and uneven provincial implementation. Conversely, Bangladesh has achieved considerable progress in recent years with its Rights and Protection of Persons with Disabilities Act (2013) that demonstrates a human-rights and inclusive approach. This Act, complemented by the Neurodevelopmental Disability Trust Act (2013), not only mirrors the UNCRPD principles but also includes provisions for the needs of people with autism, Down syndrome and cerebral palsy, which has been neglected in previous legislations. Bangladesh's emphasis on language inclusion, accessibility and safeguards against exploitation indicates a shift towards a human-rights approach.

Despite such progress, all three countries continue to encounter challenges, particularly, inadequate funding, monitoring, data collection, and rural accessibility. While India is ahead in terms of legislative and institutional mechanisms, Pakistan and Bangladesh are steadily evolving towards stronger protection of rights and integration of policies. Together, their changing legal frameworks reflect a common South Asian commitment to dignity, equality and inclusion for people with disabilities, and signal a step towards their full social inclusion and empowerment in the region.

### **3.5 Paper's discussion:**

This paper explores the national laws in South Asian nations, focusing in particular on the comparative study of national and legal perspectives on persons with disabilities in the past and in the present. The focus is on three nations: India, Pakistan and Bangladesh. In India, before independence, persons with disabilities were mostly seen through the lens of medical pathology, with the ensuing care usually being characterised as charitable. Post-independence, the concerns of persons with disabilities have often been ignored, creating a need for barrier-free spaces and to eliminate the stigma and discrimination associated with disabilities. Over the years, several laws and policies have been introduced, with key national acts having a profound impact on the disability landscape for both society and persons with disabilities. The Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995 (PWD Act) is considered to be the first major act in India on the rights of persons with disabilities. This act sought to enable access, opportunity and support, and to eliminate discrimination in life. The act explains disability and lists the seven main types of disabilities. This was followed by other important laws such as The National Trust for Welfare of Persons with Autism, Cerebral Palsy, Mental Retardation and Multiple Disabilities Act, 1999; The Rehabilitation Council of India Act, 1992; and The Rights of Persons with Disabilities Act, 2016 (RPWD Act), which repeals the 1995 act and explains 21 types of disabilities. India's national legislations, policies, and acts are comprehensive, covering multiple life aspects for persons with disabilities including social, political, economic, education and employment and encouraging inclusivity. Pakistan and Bangladesh have difficulties providing for their citizens. They have made progress in their legislative frameworks, with an emphasis on terms and provisions for persons with disabilities. Pakistan's Disabled Persons (Employment and Rehabilitation) Ordinance, 1981, started the process of formulating inclusive policies and services for persons with disabilities. The Rights of Persons with Disabilities Act, 2002, provided further provisions to address various needs of persons with disabilities, including family support and medical counselling. Similarly, independent Bangladesh (since

1972) has also taken steps with its disability policy in 1995, supported by the ratification of the UN Convention on the Rights of Persons with Disabilities (UNCRPD). This policy began the process of defining disability, gathering evidence-based data, promoting inclusive education, offering skills training and employment quotas, providing affordable health care and nutrition, and enhancing transportation and rehabilitation services. Yet, much of the legislation in Pakistan and Bangladesh has followed a medical or charity model, largely viewing disability as a medical/mental health issue in need of treatment or welfare.

#### 4. Conclusion

The present study observes that policies and acts for people with disabilities in the three countries (India, Pakistan and Bangladesh) are moving from a welfare-approach to a rights-based approach. Previously viewed as a charity issue, disability is now being recognised globally and the ratification of the UN Convention on the Rights of Persons with Disabilities (UNCRPD) has resulted in legal reforms. India's Rights of Persons with Disabilities Act (2016) and Pakistan's Act (2020) emphasise equality and non-discrimination, while Bangladesh's act emphasises social protection. However, there are gaps in implementation due to barriers such as access and stigma. Improving institutional capacity building and community-based rehabilitation are crucial to translate policies into practice. In conclusion, although there have been advances, inclusion demands cultural change and the empowerment of persons with disabilities as change agents for equality and social justice in South Asia.

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