

MAKING PUBLIC INFRASTRUCTURE ACCESSIBLE FOR PERSONS WITH DISABILITIES



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An inclusive and accessible public infrastructure including, both physical and digital, is a key prerequisite for realizing constitutional and international obligations of enabling full civic, political, and economic participation of persons with disabilities. With a constitutional emphasis through Article 38(d) on the provision of basic necessities to all citizens including those unable to earn a livelihood due to infirmity or sickness, Pakistan's commitment to ensuring universal accessibility in physical environments, transportation, information and communication systems, and public services for Persons with Disabilities predates its ratification of [Convention on the Rights of Persons with Disabilities \(UNCRPD\)](#)¹ in 2011. It enacted Disabled Persons (Employment and Rehabilitation) Ordinance in 1981, which instituted measures for providing education, employment and healthcare services to persons with disabilities, primarily focusing on their social and financial

emancipation. In 2006, the country adopted [Accessibility Code of Pakistan](#) and [Design Manual and Guidelines for Accessibility](#), which established minimum standards for accessible design in physical infrastructure, including government buildings, transport systems, and other facilities. It mandates features such as ramps, widened doors, tactile paving, and accessible restrooms to eliminate physical barriers.

Despite an expressed commitment to the interest and priorities of persons with disabilities, Pakistan's enforcement of its legal and codal requirements remain inconsistent. Since the devolution of the subject of social development to provinces under the Eighteenth Constitutional Amendment in 2010, the federal and provincial legislatures have revised the legislative measures for enhancing the rights and entitlements of persons with disabilities with added provisions for their improved accessibility to public places and services as well as digital

What is Accessibility?

"To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas."

Article 9 of the UNCRPD

infrastructure but the legal promise is not truly reflected in the enforcement as revealed by a recent assessment of 316 government buildings conducted by the Coalition for Inclusive Pakistan (CIP) in 19 districts² across the country.

¹ The Convention is a legally binding document and provides a framework to promote, protect and ensure the full and equal enjoyment of all human rights, fundamental freedoms and dignity by all persons with disabilities.

² The public buildings assessed were spread over 19 districts including six each in Khyber Pakhtunkhwa (Bannu, Buner, Malakand, Mardan, Peshawar and Swat) and Sindh (Ghotki, Hyderabad Jacobabad, Karachi, Khairpur and Matiari), three in Punjab (Bahawalpur, Gujranwala and Sialkot), and two each in Balochistan (Loralai and Quetta) and Gilgit Baltistan (Gilgit and Nagar)

The CIP’s assessment of public buildings, including National Database and Registration Authority’s registration centers, government hospitals, and local offices of the Provincial Social

Welfare Departments, showed a discouragingly low rates of adherence to the Accessibility Code’s requirements as well as exposed stark disparities in public building’s accessibility, particularly

between urban and rural areas. The public buildings in urban areas demonstrated a 30 percent higher prevalence of accessibility features compared to rural areas.

Figure 1: Availability of Accessibility Features in Key Public Buildings Frequently Visited by Persons with Disabilities

<p>Designated Parking Space for persons with disabilities is available</p> <p>20 percent</p>	<p>Walkway is 48-inch wide, smooth and levelled with a gradient no steeper than 1:12</p> <p>28 percent</p>	<p>A ramp is available in case of stairs or uneven height</p> <p>48 percent</p>
<p>Maximum slope of the ramp is 1:21</p> <p>38 percent</p>	<p>Ramp has handrails on both sides</p> <p>23 percent</p>	<p>Entrance door has a minimum clear width of 900 mm</p> <p>83 percent</p>
<p>Doors have handles that are positioned between 850 mm and 1100 mm from the floor</p> <p>38 percent</p>	<p>Doors are automatic or power-assisted</p> <p>Six percent</p>	<p>Features including tactile paving, Braille signage, visual alarms, and audio cues to enable visitors with audiovisual impairments</p> <p>Zero percent</p>

Such inconsistencies not only violate the legal mandates but also perpetuate exclusion, particularly for those in underserved rural communities. Against this backdrop, this policy brief leverages CIP’s evidence-based assessment to propose actionable

recommendations by examining the challenges to enforcement of legal and codal requirements for accessible infrastructure. These hurdles include, among others, the jurisdictional ambiguities that followed the 18th Constitutional Amendment, limited awareness

among building regulatory agencies and inadequate monitoring mechanisms. Without addressing these barriers, Pakistan risks failing both its moral and legal obligations to persons with disabilities.

Key Requirements for Accessible Physical infrastructure	
A.	Accessible entrance and pathways including wheelchair-friendly main entrance, 36-inches wide non-slipper pathways and ramps having slop not more than 1:12 along with handrails on both sides
B.	Designated parking spots with at least two percent of total parking space and with drop-off area close to entrance along with proper signage
C.	Accessible internal environment with 32-inches wide doorways, 36-inches wide corridors and non-slippery floors free from abrupt level-changes.

Key Requirements for Accessible Physical infrastructure

D.	Usable restrooms on each floor with grab bars and a minimum turning space of 5 feet diameter for wheelchairs and appropriate sinks with height not more than 34-inches and clearance of wheelchairs
E.	Braille signage and high-contrast large font across building particularly guiding on emergency exits for people with visual impairments.
F.	Mandatory elevators in buildings with multiple floors with audio announcements, braille buttons, and a minimum door width of 36 inches.
G.	Stairs having handrails on both sides and tactile markings for visually impaired individuals.

Pakistan Accessibility Code 2006

EXISTING CHALLENGES TO ENSURING ACCESSIBILITY

This paper identifies three main challenges to ensuring an accessible public service infrastructure including legal inconsistencies and gaps, weak enforcement and oversight mechanisms and limited scope of existing accessibility requirements and guidelines.

A. Inconsistent Applicability of Accessibility Requirements

The existing legal framework for accessible public infrastructure is fragmented and inconsistent. The subjects of social welfare and building control fall under provincial jurisdiction, whereas the Accessibility Code is a federal instrument. Its implementation at the provincial level requires binding legal provisions. However, only the disability rights laws of Sindh and Punjab mandate compliance with the Accessibility Code of Pakistan 2006. In contrast, the updated laws on rights and empowerment of Persons with Disabilities in Balochistan, Gilgit Baltistan and the

Islamabad Capital Territory do not reference the code at all, creating a regulatory gap that hinders uniform application. Moreover, the enforcement of Accessibility Code in Khyber Pakhtunkhwa may also face enforcement challenges as the province is yet to enact an updated legislation for Persons with Disabilities.

B. Limited Scope of Legal and Regulatory Provisions on Accessibility

The Accessibility Code of Pakistan 2006 and legislation on the rights of persons with disabilities primarily address physical infrastructure but provide little clarity on digital accessibility. A recent assessment by the Free and Fair Election Network (FAFEN) revealed that parliamentary websites lack accessibility features, except for the National Assembly and Punjab Assembly websites, which have incorporated some. In an era where essential public services, including banking, government registrations,

taxation, and public communication, are increasingly digitized, the absence of minimum standards for digital accessibility creates significant barriers. Moreover, while existing guidelines outline general requirements for physical infrastructure, they fail to provide sector-specific standards. Educational institutions, healthcare facilities, recreational spaces, and transportation hubs each require tailored accessibility provisions to meet diverse needs.

C. Weak Enforcement and Oversight Mechanisms on Existing Requirements and Guidelines

The Accessibility Code of Pakistan and other relevant statutes lack legally binding enforcement provisions. These frameworks do not define the offences and lack any penalties for non-compliance. The existing requirements of building plan approvals and the issuance of completion certificates also lack checks concerning

adherence to accessibility standards. Moreover, the absence of on-site verification and post-construction audits allows many buildings to operate without

meeting the required criteria. Furthermore, there is no structured grievance redressal mechanism for complaints related to non-compliant buildings, leaving

persons with disabilities without an effective means to seek enforcement.

RECOMMENDATIONS FOR ENHANCING ACCESSIBILITY IN PUBLIC INFRASTRUCTURE

A. Harmonize and Expand Legal Frameworks on Accessibility

The federal and provincial legislatures as well as governments should focus on strengthening the legal frameworks on accessibility by:

- i. **Uniformly applying accessibility standards across regions:** For a universal applicability of infrastructure accessibility standards, the federal and provincial statutes should either mandate the adherence to Accessibility Code of Pakistan in their respective jurisdictions or require adoption of a locally-developed standards on the subject. Moreover, Khyber Pakhtunkhwa should update the primary legislation on the subject that include UNCRPD-compliant provisions on accessibility and mobility.
- ii. **Broadening the scope of accessibility framework:** As discussed in the challenges, the current scope of accessibility framework is generally focused on physical infrastructures alone with cursory mentions of digital infrastructures. The federal and provincial authorities should

consider mandating the adherence with [Web Content Accessibility Guidelines](#) for all government websites and applications including those providing public services.

- iii. **Instituting mechanisms for overseeing the implementation of accessibility requirements:** For enhancing the compliance rate with the accessibility requirements, the legislatures should empower the existing institutional organizations created under the federal and provincial statutes on rights and empowerment of persons with disabilities to enforce the accessibility requirements by requiring mandatory compliance reports from the building control authorities in their respective jurisdictions. The Council on Rights of Persons with Disabilities constituted under the Islamabad Capital Territory Rights of Persons with Disability Act 2020; Provincial Advisory Council on Disability constituted under the Sindh Empowerment of Persons with Disabilities Act 2018; Provincial Council for the Rehabilitation of Disabled Persons constituted under the Balochistan Persons with

Disabilities Act 2017; Council on Rights of Persons with Disabilities constituted under the Punjab Empowerment of Persons with Disabilities Act 2022; and Provincial Council for the Rehabilitation of Disabled Persons constituted under the Gilgit Baltistan Persons with Disabilities Act, 2019 should be legally mandated to monitor compliance, conduct inspections, and recommend penalties for violations.

B. Improve Coordination among Relevant Government Institutions

The federal and provincial institutions with the authority to protect the rights and entitlements of the persons with disabilities should enhance their collaboration with the municipal authorities and regulatory agencies for improved enforcement of the accessibility requirements for public infrastructure. The federal and provincial councils enforcing the rights of persons with disabilities should actively collaborate with the Pakistan Engineering Council (PEC) and Council of Architects and Town Planners (CATP) to oversee the inclusion of the international best



practices on infrastructural accessibility in the guidelines and building codes prepared by these organizations. Additionally, they should work closely with Pakistan Railways, National Highway Authority (NHA), and Provincial Planning & Development and Works & Services Departments to oversee road infrastructure accessibility. Additionally, these organizations should work with the mass transit authorities in their respective provinces for an accessibility public transport infrastructure in the cities. Similarly, the State Bank of Pakistan (SBP), Securities and Exchange Commission of Pakistan (SECP) and other relevant government departments should be reached out for emphasizing the

accessibility in banking and business services.

C. Strengthen Implementation Mechanisms at Local Levels

While the DGSE in ICT and provincial departments with the mandate of empowerment of persons with disabilities oversee accessibility policies, there is no standardized implementation mechanism across provinces. To address this, these authorities should develop provincial-level Accessibility Action Plans with specific timelines and monitoring frameworks. Similarly, the local governments and urban development authorities such as Karachi Metropolitan Corporation or Capital Development Authority

should have designated accessibility officers responsible for ensuring compliance in parks, marketplaces, and public spaces.

D. Capacity Building for Professionals and Institutions

To ensure proper implementation, key institutions must be trained in universal design principles. The Pakistan Engineering Council (PEC), Institute of Architects Pakistan (IAP), and universities offering architecture and civil engineering degrees must include accessibility training as part of the curriculum. Likewise, the town planners, urban developers, and consultants should undergo mandatory workshops on accessibility standards.



ABOUT CIP

Coalition for Inclusive Pakistan brings together more than 150 citizens groups mostly led by persons with disabilities, women, and transgender persons, working across Pakistan for their social, economic, political, and electoral emancipation. This unique collaboration seeks to overcome the systematic marginalization confronting these marginalized groups and solidify their position as a formidable network that can work to amplify their voice and advocate for effective action, to specifically increase their political and electoral participation.

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